

I-58 Aimee Bullock

I-58-1 The County acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.

I-58-2 The comment states that the change in land use would have an adverse impact not only to the community, but to every person and every way of life that has existed here for decades. The County disagrees with this comment. See Section 3.3, Land Use and Planning. Impacts due to changes in land use were determined to be less than significant. The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-3 The comment states that they welcome development and understand this project was rejected twice by the County Board of Supervisors. This comment also states that they couldn't be angry when their property was zoned from 1 du per 8 ac to 1 du per 20 ac. The previous project denial has no bearing on the current project or its environmental analysis because: (a) the prior project was considered and rejected more than seven years ago under different factual and legal circumstances, (b) the prior project was subject to different environmental analyses, and (c) the prior project involved different features, plans, and amenities. The Draft EIR for the proposed project has been prepared in compliance with CEQA, and represents a substantial size reduction when compared to the prior project, as it would develop approximately 20% fewer homes, preserve an additional 17 acres of open space onsite plus an additional 218 acres off-site, and generate approximately 7,000 fewer daily trips overall. Nonetheless, the County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue requiring any further response under CEQA.

Regarding the rezoning of the commenters property, The County notes the comment provides factual background information and does not raise an environmental issue within the meaning of CEQA. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.

I-58-4 The County acknowledges the comment letter, and notes it expresses general opposition for the project, but does not raise any issue concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.

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The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-5 The comment states that there are 7,000 homes proposed for Fallbrook, Valley Center, Escondido and San Marcos, and that 1,878 homes are already approved for Fallbrook by the County. The comment asks if the Draft EIR included future growth into the report. As stated in Section 2.12, Population and Housing, on page 2.12-14, “The proposed project would directly, indirectly, and cumulatively induce substantial population growth in the area (Impacts PH-1 and PH-2). Such impacts cannot be feasibly mitigated, absent a feasible alternative to the project or the County’s adoption of the applicant’s requested General Plan Amendment. Therefore, the potentially significant direct, indirect, and cumulative impacts (Impacts PH-1 and PH-2) would remain significant and unavoidable.” The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-6 The comment is concerned that the project will force rattle snakes, scorpions, coyotes, and tarantulas into urban communities where they will perish. The comment states that the EIR should fully study the impacts of human contact and residents using the open space inappropriately. As stated in Section 2.4, Biological Resources, on page 2.4-77, “An important aspect of preserve principles is to protect preserves from encroachment. Ideally, preserves would establish blocks of habitat without road access and be inaccessible to human disturbance. Much of the area is encompassed by dense chaparral. In such habitat, unmaintained dirt roads on Site may serve as important wildlife corridors for large mammals, including mule deer, coyote, gray fox, and bobcat. These species may be sensitive to human disturbance and/or presence. Currently the habitat sees much human use, particularly in the southeast and northwest portions of the Site.

Designated public access trails are planned and will use signage and designated trail routes to protect the biological open space and control human encroachment. It is also important to protect large patches of habitat that do not currently contain trails. The proposed trails, as shown in Figure 2.4-10, Proposed Uses, would be located along pre-existing dirt roads and trails. The use of these trails would be monitored and reinforced by a preserve manager who would visit the area on a semi-weekly basis to document and reinforce these efforts.

Management of the biological open space areas would help keep current trespassers from dumping trash, camping, using off-road vehicles, boulder graffiti/tagging, and participating in other illegal activities. In many areas, the portion of FMZ directly adjacent to buildings would consist of vineyards. These would provide a sense of ownership that could deter trespassing. The County will include the comment as part

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of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-7 The comment states that they have concerns with farmland in the area and how blasting, rock crushing, silica dust and pollution of air and water will affect nearby orchards and other vegetation. See Section 2.2 Agricultural Resources page 2.2-12 for a discussion of construction impacts to agricultural resources. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-8 The comment states that the destruction of orchards and other flora/fauna will affect aesthetics, reduce property values, and potentially crop production. The comment also states that the loss of habitat should be mitigated for locally and not off-site in Ramona where land is cheaper. Regarding the comment that the project would result in the destruction of orchards leading to reduced property values, the County acknowledges the comment and notes it raises economic issues that do not appear to relate to any physical effect on the environment.

Potential impacts related to aesthetics and crop production are analyzed in Section 2.1 Aesthetics and Section 2.2 Agricultural Resources, respectively.

Regarding the comment that the loss of habitat should be mitigated for locally and not in Ramona, the County acknowledges that the off-site mitigation area is located approximately 20 miles east of the project Site and with some elevation and topographical differences compared to the project Site. However, the County allows for off-site mitigation areas that provide similar vegetation communities and habitat types. The proposed off-site mitigation area is located entirely within the PAMA and conservation of this site contributes to the overall preserved lands within the PAMA and provides an important block of habitat for that region.

As described in the Newland Sierra Off-Site Mitigation Memorandum (Appendix K to Appendix H of the Draft EIR), the mitigation site is comparable to or better than the habitat that is being impacted on the Newland Sierra site. The mitigation site includes a variety of topographic relief, a comparable suite of vegetation communities, and rock resources. Therefore, it contributes to the vegetation community mitigation requirements described in Table 2.4-27, pgs. 2.4-172 and 2.4-173 of the Draft EIR.

The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-9 The comment states that the Draft EIR does not state what impact toxic run off from wider roads, parking lots and other paved surfaces would cause. The comment

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addresses general subject areas, which received extensive analysis in the Draft EIR; specifically in Section 3.2.3.2 Water Quality – Analysis, Construction. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I-58-10** The comment states that “the Draft EIR does not discuss encounter of ground water contamination during mining and blasting.” As stated in Section 3.2, Hydrology and Water Quality on page 3.2-24, impacts to groundwater resources as a result of construction would be less than significant. As addressed in Appendix J-4 to the EIR, the project Site does not support significant groundwater recharge. As stated in Appendix J-4:

the Cretaceous-aged Granitic Rock unit that underlies the majority of the site is very hard, moderately weathered, slightly fractured and exhibits steep topographic relief. In addition, our seismic refractions indicate accelerations averaging over 11,000 feet per second at a depth of 15 to 25 feet below the exiting ground surface within the Granitic Rock unit.

Granitic Rock unit which underlies the majority of the site serving as an area where a significant amount of groundwater recharge occurs is very low. Instead, given these geologic conditions on the site, the majority of rainfall that occurs on the site would be expected to drain to the lowest elevations of the site and to valley areas off site before entering the groundwater table. In addition, if groundwater were to exist within fractures of the Granitic Rock unit, it is our opinion that potential recharge rates would be very low.

Accordingly, the grading and blasting activities during the construction are not likely to encounter significant groundwater resources. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I-58-11** The comment states that the EIR does not include how new roads and mass development would burden property owners and their land. The comment also states that any planned eminent domain should appear in the EIR. The County acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. As it relates to the depiction of Right-of-Way acquisition required for the project’s off-site road improvements, please see ROW Exhibits—Deer Springs Road and ROW Exhibits—Twin Oaks Valley Road, including as Additional Items to the Public Review Draft

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EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-12 The comment states that the surrounding highways are impacted and not adequately mitigated, because a commitment to pay fees without any evidence that mitigation will actually occur is not an adequate mitigation. The comment also provides background information on Highway 78 and the increase in home purchases in Menifee, Murrieta, or Temecula, causing increases in traffic. As stated in Section 2.13 Transportation and Traffic, on page 2.13-112, “As explained in Section 2.13.3, the County has adopted and is implementing a Traffic Impact Fee (TIF) Program to collect impact fees from new development and construct new or expanded road, highway, interchange, and intersection facilities in the unincorporated County necessary to accommodate new development planned under the County’s General Plan. In so doing, the TIF Program is an impact fee program designed to facilitate compliance with CEQA by providing a funding mechanism for these new facilities which serve to mitigate the indirect, cumulative traffic impacts created by new development. Accordingly, where the project would result in cumulative impacts to TIF Eligible Facilities, compliance with the County’s TIF Program would serve as mitigation for those impacts.” The County also refers the commenter to **Topical Responses TR-1 through TR-3**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-13 The comment states that the EIR did not measure the effects bike lanes would have on traffic and if it would cause more congestion. The County does not concur with the comment. As stated in Section 2.13, Transportation and Traffic, on page 2.13-82, “The project’s proposed improvements to Deer Springs Road and Twin Oaks Valley Road include a ten-foot-wide multi-use pathway and dedicated bicycle lanes that would connect directly to the project’s internal network of pathways and trails, and the bicycle lanes on Sarver Lane and Mesa Rock Road as well as to the existing multi-use pathway and bicycle path along Twin Oaks Valley Road heading into the City of San Marcos. Compared to existing conditions where facilities do not exist or only partially exist, these pedestrian and bicycle improvements would create safer conditions for these two alternative forms of travel along the project’s off-Site road improvements.”

Relative to the impact of bike lanes on traffic, CEQA does not require such an analysis occur. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

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- I-58-14** The comment states that the traffic analysis did not state which study area was used to determine impacts. See Section 2.13.2.1 Project Study Area in Section 2.13 Transportation and Traffic. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-58-15** The comment states that there is no indication when the developer plans to widen Deer Springs Road. The comment also expresses concern over evacuation during a wildfire and gridlock on Deer Springs Road. As stated in Section 2.13 Transportation and Traffic on page 2.13-109, prior to the issuance of the certificate of occupancy for the 58th EDU, the Project applicant, or its designee, shall widen Deer Springs Road. Regarding evacuation, see **Topical Response HAZ-1**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-58-16** The comment states that Warner Ranch Project would impact MRZ-2 land with an estimated value of 43 million dollars and that the Newland Sierra project would create a loss of 63 million dollars due to the loss of MRZ-2 land. The comment asks if the EIR accounted for future mineral resource loss from proposed developments. As stated in Section 2.9 Mineral Resources, on page 2.9-10,

“As growth in the region continues, mining and extraction activities are likely to be directly and indirectly impacted by new development. Mineral resources, particularly sand, gravel, and rock, are a regional resource (see Figure 2.9-2, County-Wide Quarries, Mines, and Gem Deposits). The proposed project, in combination with the cumulative projects, could potentially impact mineral resources within the MRZ-2 zone. Only a small portion of planned development is proposed within the MRZ-2 zone located in the northern portion of the development, and potential future extraction from the Quarry parcel would not be precluded.

On a region-wide cumulative scale, the eastern portion of San Diego County would not be economically feasible for mining activities due to haul distances and lack of infrastructure. Because the majority of resources would be available for extraction, a significant cumulative impact would not occur. As such, cumulative projects would result in a less-than-significant impact, and the proposed project would not result in a cumulatively considerable impact on mineral resources.”

The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

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I-58-17 The comment asks what the affects will be on resident's homes from vibration due to blasting and rock crushing. See Section 2.10.3.3 Groundborne Vibration in Section 2.10, Noise. As stated therein on page 2.10-24, "The nearest sensitive receptors to on-site construction that could produce high vibration levels would be at the mobile home park south of Deer Springs Road, which is located approximately 150 feet from the nearest construction area associated with the proposed project. Therefore, vibration levels may exceed 0.004 inch per second RMS or 0.1 inch per second PPV from general grading and pile driving activities on Site and off Site at the nearest residence. This impact would be potentially significant (Impact N-8)."

Also stated on page 2.10-24,

"The explosive charges used in mining and mass grading are typically wholly contained in the ground. However, because the blasting locations, necessary geotechnical data, and blasting and materials handling plans are not known at this time, it is not possible to conduct a noise analysis assessing the proposed blasting and materials handling associated with the proposed project. Therefore, for purposes of this analysis, impacts would be potentially significant (Impact N-9)."

Please also see **Topical Response AQ-1 through AQ-3**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-58-18 The comment asks how the proposed commercial space will affect local small businesses. The County acknowledges the comment and notes it raises economic, social, or political issues that do not appear to relate to any physical effect on the environment. The County also notes that the existing General Plan land use designations would allow up to 140,000 square feet of commercial whereas the project is proposing only 81,000 square feet of neighborhood-serving retail in an area that generally lacks those uses today. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.

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