

### I-91 Tom Curriden

**I-91-1** The comment is regarding Mitigation Measure **M-TR-1** and states that failing to require the applicant to design and implement the interchange improvements causes the mitigation and applicant to fail to meet its obligation under CEQA and the County, which both require detailed and enforceable mitigation. The County does not concur with the comment. Mitigation measure M-TR-1, which has been revised in response to comments, complies fully with CEQA and County requirements by appropriately recognizing Caltrans' role in the process. See Topical Response to Comment (**TR-TR-2 Interchange Phasing**) and revised mitigation measure **M-TR-1**.

**I-91-2** The comment is regarding MM-TR-6 (Buena Creek Road/Monte Vista Intersection). The comment states the Draft EIR provides two options for mitigation at this intersection: 1) a traffic signal with additional EB left pocket; or, 2) a roundabout. Preliminarily, the commenter incorrectly references Option 1, which, as stated in Section 2.13, Transportation and Traffic, on page 2.13-107 of the Draft EIR, would add one southbound shared left/right turn lane; one westbound through lane, and one right-turn lane with right-turn-overlap; and one eastbound left-turn lane, and one through lane.

The comment states that the Twin Oaks Valley Sponsor Group designated a roundabout at this intersection as a top priority and that it should be considered superior (or the only) mitigation. The County acknowledges the comment and notes it expresses the opinions of the commentator, 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-91-3** The comment is regarding Table 2.13-27 of the Draft EIR. The comment states that the second road segment under Buena Creek in Table 2.13-27 should be Monte Vista Drive to Twin Oaks Valley Road, not Monte Vista Drive to Deer Springs Road.

The County agrees with the comment. The Final EIR has been revised in response to the comment.

**I-91-4** The comment states that the project's peak hour contribution to the Monte Vista Drive/Foothill Drive intersection should have been included in the traffic study, with consideration given to mitigation working in tandem with improvements to the Monte Vista Drive/Buena Creek Road intersection.

The Monte Vista Drive/Foothill Drive intersection was not specifically included in the Draft EIR analysis since it is an unsignalized intersection that does not carry high traffic volumes in the existing condition and that presently functions at an acceptable

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- level of service. While the intersection was not included, the segment of Monte Vista Dr. between Foothill and Buena Creek Rd., which connects to the Monte Vista Drive./Foothill Drive. intersection, was included and analyzed in the Draft EIR. The analysis identified a significant cumulative impact to that segment and recommends intersection improvements to the Buena Creek Road/Monte Vista Drive intersection that would reduce the project's cumulative impacts to less than significant (refer to **Impact TR-37** and Mitigation Measure **M-TR-6** in Section 2.13.12 of the EIR). Notwithstanding, in response to the comment, an analysis of the Monte Vista Drive/Foothill Drive intersection was conducted for the AM and PM peak periods to evaluate whether the project would result in a significant direct or cumulative impact at the intersection (refer to the *Sierra—Monte Vista Drive/Foothill Drive Intersection Operations* memo prepared by LLG, Appendix JJ-22 to the Final EIR). The analysis found that the intersection would operate at an acceptable LOS C with project traffic included, and an acceptable LOS C with project and cumulative projects traffic included. Therefore, the project would not result in a significant impact at this intersection and no additional mitigation is required.
- I-91-5** The comment states that the Buena Creek Road./S. Santa Fe Avenue intersection is presently operating beyond the point of failure. The comment provides 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-91-6** The comment restates information contained in Appendix R1 (Traffic Impact Analysis) to the Draft EIR and asks why Appendix R1 does not quantify the intersection delay when it exceeds 100 seconds. . The specific amount of delay calculated at an intersection is not considered reliable to the nearest second when the delay exceeds 100 seconds. Therefore, it would be inaccurate and misleading to attempt to report delays in this range to the nearest second. Nevertheless, the Draft EIR identifies significant direct and cumulative impacts at the intersection and provides mitigation in the form of a dedicated southbound right turn lane that would reduce the project's direct and cumulative impacts to less than significant (refer to Impacts **TR-7** and **TR-27**, and Mitigation Measure **M-TR-7**). The Draft EIR identifies significant impacts at all intersections where the delay exceeds 100 seconds, so even if specific delays were provided, no revisions to the DEIR conclusions would be required.
- I-91-7** The comment states that **M-TR-7** is not detailed enough as it does not discuss feasibility of adding these lanes given proximity to Sprinter Station and that a "Rail Trail" is currently being implemented by the County. The County has previously

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prepared draft construction-level improvement plans (refer to “Plans for the Construction of South Santa Fe Avenue Improvements, R.S. 1874-2”, 90% Submittal, June 2011, aka “S. Santa Fe Avenue CIP Project”) for the feasible widening and realignment of S. Santa Fe Avenue and the related intersection improvements to directly connect Buena Creek Road and Sycamore Avenue as part of its Capital Improvement Program (CIP). S. Santa Fe Avenue is also a Traffic Impact Fee (TIF) Program Eligible Facility. The improvements identified in Mitigation Measure **M-TR-7** in the Draft EIR are consistent with the County’s planned improvements to the Buena Creek Road/S. Santa Fe Avenue intersection (as shown in the Draft S. Santa Fe Avenue CIP improvement plans) and, therefore, the identified mitigation improvements are feasible. As it relates to the Inland Rail Trail improvements, these improvements are also consistent with the draft S. Santa Fe Avenue CIP improvement plans and the trail improvements are currently underway and will be completed in advance of any improvements to the intersection in the form of mitigation performed by the project.

**I-91-8** The comment states that the Draft EIR fails to address the efficacy of **M-TR-7** given the Sprinter Station, plans for NCTD to install a double-track in this location, and the lack of pedestrian and disabled access. The County does not agree with this comment. Please see **Response to Comment I-91-7**, above, for information responsive to this comment. Intersection and roadway improvements as shown on the improvement plans for the planned but currently unfunded S. Santa Fe Avenue CIP Project, including improvements to the Buena Creek Road/S. Santa Fe Avenue intersection and related improvements along Buena Creek Road, have been designed in compliance with applicable Americans with Disabilities Act (ADA) and pedestrian access requirements. As the project would be conditioned to implement **M-TR-7** in a manner that is consistent with the future S. Santa Fe Avenue CIP Project, the project’s improvements would likewise be in compliance with applicable ADA and pedestrian access requirements.

**I-91-9** The comment states that there is an impact at the intersection of Robelini Drive and S. Santa Fe Avenue and that the Draft EIR excuses the applicant from mitigating by saying that such an improvement is not “proportional” given the 8% increase to volume and the 5 mile distance to the project site. The County does not concur with the comment. While it is correct that the project would add a relatively small amount of traffic to the intersection given the distance from the project site, as further explained below, these are just two of the factors to consider when assessing the feasibility of mitigation in this case. The addition of lanes on each side of S. Santa Fe Avenue necessary to fully mitigate the impact would require the acquisition of additional right-of-way owned by private parties. However, any such property acquisition and related widening would be inconsistent with the County’s long-term

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plans for the intersection, which is to realign Sycamore Avenue to connect directly to Buena Creek Road, thereby rerouting traffic from Robelini through a new intersection connecting Buena Creek Road and S. Santa Fe Avenue traffic directly to Sycamore Avenue. Accordingly, implementation of the short-term (i.e., temporary) mitigation to reduce the project's impacts would require the acquisition of private property and be inconsistent with the County's long-term plans for improving the intersection and, therefore, is infeasible. However, the project would partially mitigate its impacts to the Robelini Drive/S. Santa Fe Avenue Intersection by improving the nearby Buena Creek Road / S. Santa Fe intersection (Mitigation Measure **M-TR-7**), which would improve traffic flow along the entire corridor, and also participate in the County's Transportation Impact Fee (TIF) program, which will provide funding for the ultimate improvements at the intersection.

The Draft EIR identified significant direct and cumulative impacts to the Robelini Dr./S. Santa Fe Ave. intersection (Impacts **TR-8** and **TR-28**), to the short segment of S. Santa Fe Avenue between Robelini Drive and Buena Creek Road (Impacts **TR-16** and **TR-38**), and, as addressed in **Response to Comment I-91-7** above, to the intersection of Buena Creek Road and S. Santa Fe Avenue (Impacts **TR-7** and **TR-27**).

The project proposes Mitigation Measures **M-TR-7** as mitigation for the impacts to the Buena Creek Road/S. Santa Fe Avenue intersection (Impact **TR-7**) and as partial mitigation for the impacts to the Robelini Drive/S. Santa Fe Avenue intersection and the short segment of S. Santa Fe Avenue between Robelini Drive and Buena Creek Road (Impacts **TR-8** and **TR-16**). As it pertains to Impacts **TR-8** and **TR-16**, Draft EIR Section 2.13.12.1, Direct Impacts, states the following (*emphasis added*):

### **Impact TR-8:** Robelini Drive/S. Santa Fe Avenue Intersection

The impact to this intersection would be mitigated by adding receiving lanes on each side of S. Santa Fe Avenue. A detailed review of the constraints to provide additional lanes at the intersection was conducted. *These improvements would require widening S. Santa Fe Avenue where right-of-way does not exist and significant impacts to private property would result to acquire the necessary right-of-way.* The increase in volume at this intersection due to the project is approximately eight percent (8%). Therefore, the required improvements would not be proportional to the level of impact the project has at this intersection, which is located over 5 miles from the Project site. Based on these factors, improvements at the Robelini Drive/S. Santa Fe Avenue intersection are considered infeasible.

It should be noted that the S. Santa Fe Avenue intersections with Buena Creek Road and Robelini Drive operate under a single traffic controller. The

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improvements at the Buena Creek Road/S. Santa Fe Avenue intersection identified above in Mitigation Measure **M-TR-7** would partially mitigate the project's impacts to the Robelini Drive/S. Santa Fe Avenue intersection, however, **M-TR-7** would not fully mitigate the impact identified herein. Therefore, this impact to the Robelini Drive/S. Santa Fe Avenue intersection is considered significant and unavoidable.

### **Impact TR-16:** S. Santa Fe Avenue: Robelini Drive to Buena Creek Road

Mitigation of this impact to less than significant would require adding a second lane along each side of S. Santa Fe Avenue (refer to **Impact TR-8**). As stated above, *a review of the right-of-way constraints along this section of S. Santa Fe Avenue indicates widening the road to add lanes would result in significant impacts to private property.* In addition, the increase in volume on S. Santa Fe Avenue due to the project is less than 13%. Therefore, the widening of S. Santa Fe Avenue, which is over 5 miles from the project Site, is not proportional to the project's impact.

It should be noted that the S. Santa Fe Avenue intersections with Buena Creek Road and Robelini Drive operate under a single traffic controller. The improvements at the Buena Creek Road/Santa Fe Avenue intersection (refer to Mitigation Measure **M-TR-7**) would partially mitigate the project's impacts to this segment of S. Santa Fe Avenue. However, Mitigation Measure **M-TR-7** would not fully mitigate the impact. Therefore, this impact is considered significant and unavoidable.

As it pertains to the project's cumulative impacts to these two intersections and the short segment of S. Santa Fe Avenue in between (Impacts **TR-27**, **TR-28**, and **TR-38**), as stated in **Response to Comment I-91-7** above, S. Santa Fe Avenue is a County TIF Eligible Facility. Section 2.13.12.2, Cumulative Impacts, states the following (*emphasis added*):

### **Impact TR-27:** Buena Creek Road/S. Santa Fe Avenue Intersection

Mitigation measure **M-TR-7** also would mitigate the identified significant cumulative impact to this intersection to less than significant.

### **Impact TR-28:** Robelini Drive/S. Santa Fe Avenue Intersection

As explained previously, there are no feasible improvements that fully mitigate the project's direct impact to this intersection. *However, with the future implementation of the S. Santa Fe Avenue CIP Project, this impact*

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*will be eliminated with the realignment of Sycamore Avenue to connect directly to Buena Creek Road, thereby rerouting traffic off of Robelini Drive and through this new intersection connecting Buena Creek Road and S. Santa Fe Avenue traffic directly to Sycamore Avenue.* S. Santa Fe Avenue and the new intersection connecting Sycamore Avenue directly to Buena Creek Road are County TIF Program Eligible Facilities and part of the Regional Arterial System (RAS). Therefore, the following mitigation measure would mitigate this cumulative impact to less than significant:

**M-TR-14** The Project applicant, or its designee, shall participate in the County TIF Program.

**Impact TR-38:** S. Santa Fe Avenue from Robelini Drive to Buena Creek Road

This segment of S. Santa Fe Avenue is a County TIF Program Eligible Facility and part of the Regional Arterial System (RAS). Therefore, Mitigation Measure **M-TR-14** would mitigate this cumulative impact to less than significant.

Therefore, the project would mitigate its direct impacts to the Buena Creek Road/S. Santa Fe Avenue intersection, provide partial mitigation for its direct impacts to the Robelini Drive/S. Santa Fe Avenue Intersection and the segment of S. Santa Fe Avenue between Buena Creek Road and Robelini Drive, and fully mitigate its cumulative impacts to all three of these facilities, which as noted above operate under a single traffic controller (i.e., more like a single intersection), through a combination of Mitigation Measure **M-TR-7** and participation in the County's TIF Program.

Finally, as addressed in **Impact TR-28** above, "with the future implementation of the S. Santa Fe Avenue CIP Project, this impact will be eliminated with the realignment of Sycamore Avenue to connect directly to Buena Creek Road, thereby rerouting traffic off of Robelini Drive and through this new intersection connecting Buena Creek Road and S. Santa Fe Avenue traffic directly to Sycamore Avenue". Accordingly, the improvement to add additional lanes to S. Santa Fe Avenue and Robelini Drive to mitigate the project's direct impacts would be temporary only as it would not be consistent with the County's long-term plans for improvements to the intersection that are part of the future S. Santa Fe Avenue CIP Project, thereby resulting in temporary, "throw away" improvements with substantial implications to private property, thereby making these improvements infeasible.

**I-91-10** The comment states that the 8% increase attributable to project traffic at the Robelini Drive/S. Santa Fe Avenue intersection, and the 5 mile distance from the project site

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lacks relevance and should be removed. The County does not agree with the comment. Please see **Response to Comment I-91-9** above.

**I-91-11** The comment states that improvements to the Robelini Drive/S. Santa Fe Avenue intersection are technically, physically, and economically feasible, and that if the County determines otherwise, the County should require a Statement of Overriding Considerations pursuant to CEQA Section 21081(a) that includes technical, physical, or economic reasons as to why the improvements are infeasible. As explained in **Response to Comment I-91-9** above, the project would provide partial mitigation for its direct impacts to this intersection, the project's cumulative impacts to this intersection would be fully mitigated, and the County has determined that the improvements necessary to fully mitigate the project's direct impacts are infeasible. County agrees that a Statement of Overriding Considerations is required.

**I-91-12** The comment states that the TIS does not evaluate AM and PM peak hour operations for roadway segments, giving only an LOS based on a 24-hour count of total ADT. The comment also states that the TIS fails to recognize the surrounding roadway network that is typically impacted by cut-through commuters. The County does not concur with the comment as the most reliable indicator of traffic conditions is a peak hour intersection analysis, coupled with a 24-hour segment LOS.

The County of San Diego Guidelines for determining significance require AM / PM peak hour analysis for intersections, and ADT analysis for segments. Table 1 of the referenced Guidelines illustrates the thresholds of significance for roadway segments, which are expressed in terms of ADT rather than peak hour volumes. This is because intersection analysis provides a more accurate indication of traffic operations as compared to segment analysis since intersections control traffic flow along a segment corridor and are the only locations where traffic along a segment needs to potentially stop. As to segment analysis, a 24-hour ADT analysis provides the necessary data along a segment and a peak hour segment analysis does not provide any additional information not already contained in the peak hour intersection analysis.

As to "cut through" traffic, the traffic study does account for this occurrence since the existing baseline traffic volumes contain those vehicles that currently use Deer Springs Road, Buena Creek Road, and Twin Oaks Valley Road as alternate routes to SR-78 and I-15 on a daily basis. In addition, future cumulative traffic was assigned to the street system consistent with existing travel patterns recognizing that some drivers from these cumulative projects will use the Deer Springs Road "cut through route" due to future congestion on I-15 and SR-78.

**I-91-13** The comment states that County staff indicated that 90% of the commuter hour traffic on surrounding roads is from cut-through traffic and that the TIS analysis should be

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required to address this existing condition. As described in the **Response to Comment I-91-12**, the traffic study accounts for the cut through traffic since the existing baseline traffic volumes include those vehicles that currently choose to use Deer Springs Road, Buena Creek Road, and Twin Oaks Valley Road as alternative routes to SR-78 / I-15 on a daily basis.

**I-91-14** The comment regards the segment of Buena Creek Road between Monte Vista Drive and Twin Oaks Valley Road (**Impact TR-15**), and states although there is an impact to this road *segment*, mitigation is only provided for the *intersection* (**M-TR-6**). The comment is incorrect in stating that the Draft EIR includes only Mitigation Measure **M-TR-6** to mitigate the project's significant segment impacts to Buena Creek Road. As stated in Section 2.13, Transportation and Traffic, an intersection improvement at the Twin Oaks Valley Road / Buena Creek Road intersection was also recommended (see mitigation measure **M-TR-5**). Therefore, the two intersections on either end of the impacted segment would be improved, which would mitigate the segment impacts as well by improving traffic flow along the segment (these are the only two intersections along this stretch of Buena Creek Road where traffic on Buena Creek Road ever needs to stop). Table 16-4 of the Draft EIR traffic study contains an analysis showing how the intersection improvements would mitigate the Buena Creek Road segment impact to less than significant.

**I-91-15** The comment expresses general concern regarding traffic impacts on Buena Creek Road (including the segment from Monte Vista Drive west to Santa Fe),, and states that barring substantial improvements to the roadway, access to Buena Creek Road from side streets will become “problematic at best” and already present hazards for pedestrian and bicyclists will be exacerbated. The County does not concur with the comment.

As explained in **Response to Comment I-91-14**, the Draft EIR includes mitigation to improve the two intersections along Buena Creek Road between Monte Vista Drive and Twin Oaks Valley Road and those improvements would mitigate the traffic impacts along Buena Creek Road to less than significant. These intersection improvements would improve traffic flow along the segment, thereby addressing the commenter's concerns. Table 16-4 of the Draft EIR traffic study contains an analysis showing how the intersection improvements would improve operations along Buena Creek Road. See **Response to Comment I-91-19** for information regarding mitigation for the portion of Buena Creek Road between Monte Vista Drive and South Santa Fe Avenue. As to the comment regarding hazards to pedestrians and bicyclists, please refer to **Response to Comments I-91-23** through **I-91-27** below for information responsive to the comment.

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**I-91-16** The comment identifies a number of issues related to the potential widening of Buena Creek Road. The County notes the comment provides background information and does not raise an environmental issue within the meaning of CEQA as the proposed project does not include or propose widening of Buena Creek Road. Moreover, the traffic impact analysis presented in the Draft EIR did not assume Buena Creek Road would be widened to 4 lanes when conducting the analysis of potential impacts. Both the direct project and cumulative impact analyses are based on the existing on-the-ground two lane configuration of Buena Creek Road. **I-91-17** The comment states that the Twin Oaks Valley Sponsor Group voted to request reclassification of Buena Creek Road, and states that the County is currently processing it as a 2-lane local collector as part of the Community Plan Update. The comment also states that no evaluation of long term cumulative impacts should be performed based on Buena Creek Road ever being improved to a 4-lane Major, and that the project should consider roundabouts and other measures to keep traffic moving steadily through the area and providing for safe pedestrian and bicycle travel.

To begin, the County has not formally initiated a process to reclassify Buena Creek Road from a four-lane major to a two-lane collector. Such a change may be part of a future Community Plan Update. As noted in **Response to Comment I-91-16**, the traffic impact analysis presented in the Draft EIR did not assume Buena Creek Road would be widened to 4 lanes when conducting the analysis of potential impacts. Both the direct project and cumulative impact analyses are based on the existing on-the-ground two lane configuration of Buena Creek Road.

Furthermore, the cumulative impact analysis performed for the project (refer to Draft EIR Sections 2.13.1.4 through 2.13.1.6) was based on the existing classifications of the road network (e.g., Buena Creek Road as a two-lane road), with only one exception -- a second cumulative scenario was analyzed that included the Mountain Meadow Road connection, a scenario that assumed Mountain Meadow Road connected to Mirar De Valley Road into Valley Center. However, even for this scenario, Buena Creek Road was analyzed as a two lane roadway.

The County General Plan Mobility Element classifies Buena Creek Road as a 4.1B Major Road with intermittent turn lanes, as necessary to accommodate General Plan buildout traffic volumes.

Regarding the comment's concern that traffic move steadily through the area, as explained in Response to Comment I-91-15, the Draft EIR includes mitigation improvements that would improve traffic flow on Buena Creek Road. As to bicycle and pedestrian travel, please see Section 2.13.9.6 of the Draft EIR, and **Responses to Comments I-91-23 through I-91-26** below.

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Finally, as to the comment that the project should consider roundabouts or other measures, Mitigation Measure **M-TR-6** proposes two options for the intersection improvements at this intersection: either traditional traffic signal and lane configuration improvements or a roundabout to replace the current all-way stop intersection.

**I-91-18** The comment states that in the alternative, no General Plan Amendment allowing for a project approaching this scale and generating these impacts should be considered. The comment expresses the opinions of the commenter and does not raise an issue relating to the adequacy of the analysis presented in the Draft EIR. Moreover, the Draft EIR analyzed a range of alternatives in Chapter 4, Alternatives. 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-91-19** The comment states that the Buena Creek Road segment from Monte Vista Drive to S. Santa Fe Avenue is impacted by the project and degrades it from an LOS D to an LOS E. The comment also refers to prior comments contained in **Comment I-91-17** regarding pedestrian and bicycle safety and related road hazards, as well as prior comments contained in **Comment I-91-7** regarding the feasibility of improvements to the Buena Creek Road / S. Santa Fe Avenue intersection.

As to operations on Buena Creek Road, as explained in **Response to Comment I-91-14**, the Draft EIR includes mitigation in the form of intersection improvements at the two intersections on either end of the referenced segment that would fully mitigate the project's identified significant impacts.

As to pedestrian and bicycle safety, please see Responses to Comments I-91-23 to I-91-26 for information responsive to the comment.

Lastly, as to the comment regarding the feasibility of improvements to the Buena Creek Road / S. Santa Fe Avenue intersection, please see **Response to Comment I-91-7** for information responsive to the comment.

**I-91-20** The comment states the function of Buena Creek Road from Monte Vista to S. Santa Fe is highly dependent on the intersection of Buena Creek Road and S. Santa Fe intersection and stacking therefrom. The comment restates concerns expressed in **Comment I-91-5 through I-91-8**. Please see the **Responses to Comments I-91-5 through I-91-8, and I-91-9**, above for information responsive to the comment.

**I-91-21** The comment states that the intersection improvements proposed for Robellini Drive/S. Santa Fe Avenue are proportionate and appropriate for mitigation and the project should be required to include as mitigation. The County does not agree with this comment. As explained in **Response to Comment I-91-9** above, there are several reasons why it is

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infeasible to implement the recommended improvement to add additional lanes on each side of S. Santa Fe Avenue. Please see **Responses to Comments I-91-7 and I-91-9** above for additional information responsive to this comment.

**I-91-22** The comment states that the County has an approved but unfunded CIP project involving the realignment of Sycamore to directly connect to Buena Creek (S. Santa Fe Avenue CIP Project), that as an approved CIP project, this CIP Project would be eligible for fair-share contributions as mitigation for long term impacts, and that the proposed Newland Sierra project should contribute to this CIP Project. The County acknowledges the comment and refers the commenter to **Responses to Comments I-91-7 and I-91-9** above, and Mitigation Measure M-TR-14, which requires that the Project applicant, or its designee, shall participate in the County TIF Program.

**I-91-23** The comment states that the County’s CEQA Guidelines require traffic impact studies to identify all pedestrian and bicycle facilities in the study area, and includes language that roads built prior to current standards may have conditions that may pose an increased risk to pedestrians and bicyclists if traffic volumes or pedestrian and bicycle volumes substantially increase along the roadway as a result of the proposed project. The comment then references the first of 4 factors addressed in these comments to consider when addressing potential impacts -- “the percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety.” The comment then states that the project significantly impacts roadways within the study area, refers to the project’s traffic contribution to Buena Creek Road, states the project’s traffic would have an adverse effect on a roadway lacking bicycle and pedestrian facilities, and concludes that the Draft EIR should have assessed this impact. As explained below and in **Responses to Comments I-91-24 to I-91-26**, the EIR adequately analyzes the project’s potential impacts to bicycle and pedestrian safety and no further analysis is required.

Section 2.13.2.2 of the Draft EIR describes the existing roadway, pedestrian, and bicycle facilities in the project study area. Section 2.13.9.6, Traffic Hazards Analysis, of the Draft EIR evaluated the factors outlined in the County’s Guidelines for assessing traffic hazards, including pedestrian and bicycle facilities impacted by the project, and concluded that the project and cumulative projects would result in less than significant impacts related to traffic hazards as the project would comply with all applicable road improvement standards:

Compliance with the applicable Public Road Standards, the County’s Mobility Element safety-related policies, and other applicable engineering

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requirements, and incorporation of the project's TDM measures and transportation-related project design features would ensure that the project results in less than significant impacts related to traffic hazards. Additionally, as each cumulative project would reasonably be expected to comply with established road and engineering standards, cumulative impacts relating to traffic hazards would be less than significant.

Specific to Buena Creek Road, with the exception of a short segment between Olive Street and Sunny Vista Lane, Buena Creek Road does not presently support pedestrian or bicycle facilities and, as a result, the road is little used by pedestrians and bicyclists. See **Response to Comment I-91-26** for information in this regard.

Additionally, in response to the comment, transportation engineers LLG analyzed accident data provided by the County from the period January 2013 through December 2017 (5-year period) for Buena Creek Road between S. Santa Fe Avenue and Twin Oaks Valley Road (refer the *Sierra—Accident Analysis and Pedestrian/Bicycle Activity* memo prepared by LLG, Appendix JJ-8 to the Final EIR). Based on the accident data and using the California Department of Transportation's methodology, LLG calculated the roadway's accident rate based and compared the rate to an expected accident rate based on statewide averages. The data disclosed that a total of 97 accidents were reported during the five-year period. Recent traffic counts indicate 10,400 ADT travel along this segment on a typical day. Based on the applicable formula, the accident rate for this segment of Buena Creek Road is 1.31. In comparison, the expected accident rate for this segment based on statewide averages is 1.32. Therefore, the actual accident rate is consistent with the expected rate and, accordingly, from a statistical standpoint, the accident rate does not indicate an increased or abnormally high risk of accidents associated with the existing road conditions. The County further notes that the majority of accidents occur at intersections and the project is proposing to improve three intersections along Buena Creek Road: the Buena Creek Road/Twin Oaks Valley Road intersection, the Buena Creek Road/Monte Vista Drive intersection, and the Buena Creek Road/S. Santa Fe Avenue intersection.

As to the percentage or magnitude of increased traffic on the road due to the proposed project that may adversely affect pedestrian and bicycle safety, while the project along with cumulative projects would result in an increase in traffic along Buena Creek Road, the comment does not present any evidence that the percentage or magnitude of increased traffic would create or contribute to a significant traffic

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hazard. Buena Creek Road currently operates at an acceptable Level of Service (LOS) D, and, with implementation of the project's mitigation measures, the road would continue to operate at an acceptable LOS with project and cumulative project traffic. Therefore, the addition of project traffic would not result in a degradation in LOS that potentially could impact pedestrians and bicyclists. Further, as addressed in **Response to Comment I-91-26** below, the use of Buena Creek Road by pedestrians and bicyclists is minimal. Finally, it is important to note that the project's improvements to the Buena Creek Road/S. Santa Fe intersection adjacent to the Sprinter Station would incorporate pedestrian facilities where such facilities are currently either deficient or lacking; and improve pedestrian safety in the area by improving access to the Sprinter Station for residents of the Buena Vista Mobile Home Park and residents along Hartwright Road.

As to Deer Springs Road and the unimproved portion of Twin Oaks Valley Road, there currently are either no pedestrian and bicycle facilities along these roads today, or the facilities are substandard. However, the project would incorporate 2.7 miles of new bicycle and pedestrian facilities along these roads, including 8-foot-wide dedicated Class II bicycle lanes along both sides of Deer Springs Road, Class I and Class II bicycle facilities along Twin Oaks Valley Road, and a 10-foot-wide multi-use pathway along Twin Oaks Valley Road and Deer Springs Road. These pedestrian and bicycle facilities would connect to the existing pedestrian and bicycle facilities along the improved portion of Twin Oaks Valley Road and substantially improve safety for pedestrians and bicyclists using these roads.

**I-91-24** Related to **Comment I-91-23**, this comment addresses the second factor to consider in assessing potential hazard-related impacts to pedestrians and bicyclists – “the physical conditions of the project site and surrounding area such as curves, slopes, walls, landscaping or other barriers that may result in vehicle/pedestrian, vehicle/bicycle conflicts.” The comment expresses concern regarding the section of Buena Creek Road south/west of Monte Vista and the lack of travel lanes for pedestrians and bicyclists, referring to prior **Comment I-91-19**.

As noted in Draft EIR Section 2.13.9.6, within the project site, all internal roadways, bicycle lanes, trails, and other portions of the proposed project's internal circulation network would comply with the County Public Road Standards, including any design exceptions granted as part of the approval, to ensure adequate safety of travel and use by motorists, cyclists and pedestrians.

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Additionally, all off-site roadway and intersection improvements to Deer Springs Road, Twin Oaks Valley Road, Sarver Lane, Mesa Rock Road, Camino Mayor, Buena Creek Road, and the I-15 / Deer Springs Road interchange would comply with the applicable public road standards to ensure adequate safety of travel and use by motorists, cyclists, and pedestrians. Please also see **Responses to Comments I-91-23, I-91-25, and I-91-26** for additional information responsive to this comment.

**I-91-25** Related to Comment I-91-23, this comment addresses the third factor to consider in assessing potential hazard-related impacts to pedestrians and bicyclists – “conformance of existing and proposed roads to the requirements of the private or public road standards as applicable.” The comment outlines design issues related to Buena Creek Road that the commenter states adversely affect pedestrian and bicycle safety. Please see the **Responses to Comments I-91-23, I-91-24, and I-91-26** for information regarding existing and proposed road conditions responsive to the comment.

**I-91-26** Related to **Comment I-91-23**, this comment addresses the fourth factor to consider in assessing potential hazard-related impacts to pedestrians and bicyclists – “the potential for a substantial increase in pedestrian or bicycle activity without the presence of adequate facilities.” The comment states that it is reasonable to expect that the project would result in an increase in bicycle traffic on Buena Creek Road given that the road provides access to the Sprinter Station. The County does not concur with the comment.

Field observations conducted as part of the EIR traffic study revealed very little pedestrian and bicycle activity in the Project vicinity, including along Deer Springs Road, Buena Creek Road, and Twin Oaks Valley Road. To supplement these observations, AM and PM peak hour bicycle and pedestrian counts were conducted on Thursday, April 26, 2018, at the following three intersections located along the three corridors:

- Deer Springs Road / Mesa Rock Road
- Deer Springs Road / Twin Oaks Valley Road

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- Buena Creek Road / Monte Vista Drive

The table below illustrates the results of the counts and shows there is very little pedestrian / bicycle activity at these locations. This is likely due in large part to the fact that there are no destinations in the nearby area that would attract pedestrians and bicyclists on a regular basis.

| Pedestrian / Bicyclist Activity – April 2018 |           |                       |                      |
|--|-----------|-----------------------|----------------------|
| Intersection                                 | Peak Hour | Number of Pedestrians | Number of Bicyclists |
| 1. Deer Springs Road / Mesa Rock Road        | AM        | 0                     | 0                    |
|  | PM        | 0                     | 1                    |
| 2. Deer Springs Road / Twin Oaks Valley Road | AM        | 0                     | 3                    |
|  | PM        | 0                     | 3                    |
| 3. Buena Creek Road / Monte Vista Drive      | AM        | 0                     | 3                    |
|  | PM        | 0                     | 3                    |

As to the potential for increases in pedestrian and bicyclist traffic due to the location of the Buena Creek Sprinter Station, the commenter provides no evidence in support of the claim, which is speculative. In its present condition, the segment of Buena Creek Road adjacent to the Sprinter Station and just north of its intersection with S. Santa Fe Avenue does not include any pedestrian or bicycle facilities, however, as addressed in **Response to Comment I-91-8** above, the project would make improvements to the intersection of Buena Creek Road and S. Santa Fe Avenue consistent with the County's future S. Santa Fe Ave. CIP Project, including ADA-complaint pedestrian access improvements on both sides of Buena Creek Road, across the intersection, and to the Sprinter Station. Therefore, the project's proposed mitigation would improve pedestrian access and safety to the Buena Creek Sprinter Station.

The County also notes that the project proposes a community-sponsored shuttle service that would provide pick-up and drop-off at either Escondido Transit Center or the San Marcos Civic Center, both of which support Sprinter Stations. Further, the San Marcos Civic Center is significantly closer to the project Site than the Buena Creek Sprinter Station and is accessible by way of Twin Oaks Valley Road, which, as addressed in **Response to Comment I-91-23** above, with incorporation of the project's proposed bicycle and pedestrian facilities, would provide continuous dedicated bicycle and pedestrian facilities along Twin Oaks Valley Road from the project to the San Marcos Sprinter Station. Therefore, in light of this safer and shorter route to the Sprinter Station at the San Marcos Civic Center, it is unlikely that the

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- project's residents would choose to bike or walk to the Buena Creek Sprinter Station. Accordingly, the project would not be expected to result in a significant increase in pedestrian or bicycle use of Buena Creek Road.
- I-91-27** The comment states that there is no substantive analysis of hazards to pedestrians or bicyclists, or any assessment of increased hazards or potential mitigation relative thereto. The County does not agree with this comment. Please refer to **Responses to Comments I-91-23 through I-91-26** above for information responsive to this comment. 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-91-28** The comment states that the Existing General Plan Alternative fails to take into account significant development constraints on the project site, which results in incorrect impact calculations related to traffic generation and biological impacts. The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.
- I-91-29** The comment states that the commercially zoned sites are subject to substantial topographical constraints that would significantly lessen development potential under the County's RPO. The County does not agree with this comment. Please see **Responses to Comments O-1.9-1 through O-1.9-7**.
- I-91-30** The comment restates information provided in the DELANE Engineering Letter dated August 4, 2017 regarding the developable area in the C-30 zone, and then provides ADT estimates based on square-footages presented in the DELANE letter that were adjusted for steep slopes and other constraints. The County does not agree with this comment. Please see **Responses to Comments O-1.9-1 through O-1.9-7**.
- I-91-31** The comment restates information provided in the DELANE Engineering Letter dated August 4, 2017 regarding the developable area in the C-36 zone, and then provides ADT estimates based on square-footages presented in the DELANE letter that were adjusted for steep slopes and other constraints. The County does not agree with this comment. Please see **Responses to Comments O-1.9-1 through O-1.9-7**.
- The comment totals the estimated ADT for the C-30 and C-36 zones combined, based on square-footages presented in the DELANE letter that were adjusted for steep slopes and other constraints. The County does not agree with this comment. Please see **Responses to Comments O-1.9-1 through O-1.9-7**.
- I-91-33** The comment incorporates the Twin Oaks Valley Community Sponsor Group letter by reference, which states that the CSO requires 75% avoidance of resources on lands

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- zoned SR-10, and 80% avoidance on lands zoning RL 20. Based on these percentages, the comment states the avoidance criteria for the Existing General Plan Alternative would result in an approximately 386-acre increase compared to the proposed Project. The comment states based on this understanding, the Existing General Plan alternative is incorrect. The County does not concur with this comment. Please refer to **Response to Comment O-1-398**.
- I-91-34** The comment states that impacts to biological resources and traffic from the Existing General Plan Alternative, which grossly overstated for biological resources and traffic and that it results in a false conclusion that the proposed project is the environmentally superior alternative. The County disagrees with this comment. The Existing General Plan Alternative was adequately analyzed in the Draft EIR in Chapter 4, Alternatives. 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 or necessary.
- I-91-35** The comment states that based on the ADT calculations provided above in comment I-91-30 and I-91-31, which were derived using DELANE Engineering's methodology for determining developable area, that the existing General Plan Alternative would generate 51% fewer ADTs, compared to the 6% reduction identified in the Draft EIR. The County does not agree with this comment. Please see **Responses to Comments O-1.9-1 through O-1.9-7**.
- I-91-36** The comment states that if the Existing General Plan Alternative was processed as a Conservation Subdivision Plan and adhered to the 80% and 75% preservation minimums of the R-20 and SR-10 zones, respectively, than only 386.3 acres would be impacted compared to the 777 acres proposed by the project. See **Response to Comment I-91-33**.
- I-91-37** The comment states that the Draft EIR Existing General Plan Alternative should be revised to reflect a design eligible for, and compatible with, the Conservation Subdivision Plan requirements. See **Response to Comment I-91-33**.
- I-91-38** This comment encompasses the DELANE Engineering letter dated August 4, 2017 that is referenced in the comments above. For responses to the comment letter, please see **Responses to Comments O-1.9-1 through O-1.9-7**.
- I-91-39** The comment states that the project is leapfrog development as defined in the Community Development Model because the project proposes to create a Village Regional Category designation that is not currently designated onsite. The County does not agree with this comment. As shown in Draft EIR on Figure 1-38, Existing Regional Categories, the southeastern portion of the site is currently designated as

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Village. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I-91-40** The comment states that the project is clearly not located contiguous to any existing or planned village, therefore, the project is inconsistent with Guiding Principle 1.2. As shown in Draft EIR on Figure 1-38, Existing Regional Categories, the southeastern portion of the site is currently designated as Village. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-91-41** The comment states that the County should not approve the project until the Climate Action Plan (CAP) has been completed. The comment also states that the Golden Door and Sierra Club recently won a trial court decision invalidating the County’s threshold for measuring greenhouse gas impacts. The San Diego County Superior Court recently rejected arguments from the Sierra Club et al. to enjoin San Diego County from processing and approving projects (including the Newland Sierra project) prior to the adoption of a lawful CAP and corresponding CEQA significance thresholds. The Superior Court held that an injunction prohibiting the “County from undertaking its planning process is too broad.” (See *Sierra Club v. County of San Diego* (Case No. 2012-0101054) and *Golden Door Properties LLV v. County of San Diego* (Case No. 2016-0037402). See also the August 10, 2016 letter from the County of San Diego Office of County Counsel to Jan Chatten-Brown of Chatten-Brown & Carstens LLP regarding “Request to Postpone Projects.” Relevant documents from these judicial proceedings, as well as the referenced letter, are included in Appendix “X” of the Final EIR.) As such, there is no legal prohibition on the County’s planning and processing activities in the absence of an adopted CAP. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-91-42** The comment states that the project is inconsistent with General Plan policies relating to housing affordability. **Refer to Response to Comment I-91-43** below.
- I-91-43** The comment states that the project is inconsistent with County General Plan Housing Element Policy H-1.9 which requires, “developers to provide an affordable housing component when requesting a General Plan amendment for a large scale residential project when this is legally permissible.” The comment states that project includes a General Plan amendment yet, includes no affordable housing.

The County does not concur with the comment that the proposed project is inconsistent with Policy H-1.9. See **Response to Comment O-1-235** and **Response to Comment I-91-44** below.

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**I-91-44** The comment states that the project is in clear violation of Goal H-3. The County does not agree with the comment. Please refer to the project conformance analysis to Policy H-1.9 and to this Goal H-3 in Appendix DD to the EIR, which states the following:

| Guiding Principle, Goal, Or Policy   | Project Conformance   | Conformance Conclusion |
|--|---|------------------------|
| <p><b>H-1.9 Affordable Housing through General Plan Amendments.</b> Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project when this is legally permissible.</p> | <p>The County does not presently have or enforce a requirement that projects include an affordable housing component when proposing a General Plan Amendment, however, the project's various neighborhoods have been planned to accommodate the housing needs of a wide range of consumer life stages and income levels. For example, the project would include 325 age-qualified housing units, 15% of the total housing proposed in the project, in its Sierra Mesa neighborhood. In addition to these age-qualified units, the project would include 762 multi-family townhome and row townhome-style units in its Town Center, Terraces, and Valley neighborhoods and 173 units in family clusters in its Valley, Knolls, and Summit neighborhoods. Finally, the project's Hillside neighborhood will include age-targeted housing units, including single-story units and units with the master living space on the ground floor. In combination, these housing types constitute over 60% of the project's proposed units, providing an important housing type for young professionals, first-time homebuyers, growing families, empty-nesters, retirees, and seniors. The balance of the project's housing would be in the form of more traditional single-family homes and accommodate many of these same demographic groups. Collectively, the project's mix of housing types includes sufficient housing options for a wide range of consumer life stages and income levels.</p> <p>In conjunction with providing a diversity of housing options, the project would include 35.9 acres of parks, a school site, and a neighborhood shopping center in conjunction with mobility alternatives including shuttle services and electric bikes for its residents to use to access these project amenities. In so doing, the project would provide both a wide range of housing options and affordable mobility alternatives to fit with its approach to housing needs.</p> | <p>Consistent.</p>     |
| <p><b>H-3 Housing Affordability for All Economic Segments.</b> Affordable and suitable housing for all economic segments, with emphasis on the housing needs of lower income households and households with special needs.</p>                         | <p>Please see the response to Goal/Policy/Objective H-1.9 above. The project's mix of housing types includes sufficient housing options for a wide range of consumer life stages and income levels, including entry-level buyers, young professionals, growing families, and seniors, often times with limited ability to afford housing in the San Diego Region. In conjunction with providing a diversity of housing options, including age-qualified and age-targeted units to accommodate the special needs of buyers such as empty-nesters and seniors, the project would include 35.9 acres of parks, a school site, and a neighborhood shopping center in conjunction with mobility alternatives including shuttle services and electric bikes for its residents to use to access these project amenities and off-site North County transit centers. In so doing, the project would provide both a wide range of housing options and affordable mobility alternatives to fit with its approach to housing needs.</p>   | <p>Consistent.</p>     |

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- I-91-45** The comment states that the project is inconsistent with Policy H-1 because it does not set aside housing for very low, low, or moderate income households. See **Responses to Comments I-91-43 and I-91-44**, above.
- I-91-46** The comment states that the project is inconsistent with Policy H-1.1 regarding sites inventory for RHNA. As stated in Appendix DD, Land Use Consistency Table, “The amount and type of housing and lot sizes was assessed in the context of the County’s Regional Housing Needs Assessment, housing sites inventory, and other housing projects within the County’s jurisdiction. The proposed project provides a range of housing types and 2,135 housing units that would help the County meet required regional housing needs for projected population growth.”
- I-91-47** The comment states that the project is inconsistent with Policy H-2 regarding well designed residential neighborhoods that respect unique local and natural environments. As stated in Appendix DD, Land Use Consistency Table, “The proposed project provides well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing. Relatedly, the neighborhoods would be crafted to include diverse housing types and styles, with homes that incorporate natural materials and building forms respecting the traditional ranch style homes and rural character of the project area. Development would be clustered in a series of neighborhoods in a manner to conserve natural resources.”
- I-91-48** The comment states that the project is inconsistent with Policy H-1.3 regarding housing near public services. As stated in Appendix DD, Land Use Consistency Table, “The proposed project would be located at the Deer Springs Road interchange with direct access to I-15, providing regional access to existing job centers in San Marcos, Vista, Rancho Bernardo, Escondido, and Poway. Additionally, commuting options for project residents would be enhanced with proximity to four Sprinter stations within 8 miles of the project: the San Marcos Civic Center Sprinter Station, the Buena Creek Station, Escondido Transit Center, and the Palomar College Station. The project would provide shuttle services to its residents between these transit stations and the project’s neighborhoods.” This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.
- I-91-49** The comment states that project is not consistent with Goals and Policies H-1, H-1.1, H-1.3, H-1.9 and H-3. See **Response to Comments I-91-43 through I-91-48** above.
- I-91-50** The comment states that the project is inconsistent with Polices H-2, H-2.1 and H-2.2. Regarding consistency with H-2, see **Response to Comment I-91-47**. Regarding H-2.1, as stated in Appendix DD, Land Use Consistency Analysis, to the EIR: “The

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proposed project requires that development be designed so as not to degrade or detract from the character of the surrounding development. To that end, natural open space would buffer the development from existing residential development. Existing surrounding residential development includes large-lot single-family homes, agricultural uses, and higher-density master-planned communities along the I-15 corridor. The project's land use plan balances development of a range of housing types and densities with conservation of open space and natural resources. In addition, the architectural character would incorporate natural, rusting materials and fundamental building forms that respect the traditional ranch style homes and rural character of the area, including farmhouse, ranch house and mountain themes.”

Regarding Policy H-2.2, as stated in Appendix DD, Land Use Consistency Analysis, to the EIR: “The project would require its multi-family housing units to be well-designed and include amenities and common open space areas that enhance overall quality of life. For example, the Specific Plan provides private open space for multi-family units in addition to the public open space provided in the Village. Within the planning areas, Sierra Town Center would include approximately 5 acres of parks. Oak Grove Park would highlight the existing oak and boulder landscape found along Deer Springs Road. Suggested offerings include picnic areas, trails, and fitness nodes, and preservation of large oak trees. Village Green would be located in the heart of the Town Center commercial area. The park would be accessible from the adjacent businesses and provide a gathering space for Community events. More “refined” in character, this park may include game tables, flexible turf, an electric bike station, and plaza seating. The Joint Use Park would be located adjacent to the school site to allow for joint uses. Proposed amenities include turf for active and passive play, a backstop for T-ball and little league practice and games, bike racks, and a children's play area.” This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I-91-51** The comment correctly states the conclusions of Section 2.12 Population and Housing, indicating that the project would directly, indirectly, and cumulatively induce substantial population growth in the area. The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. The comment also states that although the project would improve traffic capacity at certain locations, it also degrades service to many roadway segments and intersections. The County does not agree with this characterization of the project's impacts and mitigation. The project's proposed road and intersection mitigation would improve the capacity and performance of the majority of the road segments and intersections impacted by the project, even with the addition of cumulative project traffic. For example, compared to the performance under existing conditions, after project mitigation is implemented, the project would improve the

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Level of Service (LOS) at five out of the eight County and San Marcos intersections shown in Table 16-5 (refer to Existing + Project + Cumulative Projects: Mitigated Operations—Intersections, Appendix R1 to the EIR), would maintain or improve the LOS along all five of the roads (eight road segments) shown in Table 16-6 (refer to Existing + Project + Cumulative Projects: Mitigated Operations—Segments, Appendix R1 to the EIR), and would improve or maintain an acceptable LOS for all four of the road segments shown in Table 16-7 (refer to Existing + Project + Cumulative Projects: Mitigated Arterial Operations, Appendix R1 to the EIR).

**I-91-52** The comment states that while cumulative population growth impacts would be significant and unavoidable that should not be interpreted as lessening the importance of the projects substantial contribution to those impacts. The County acknowledges the comment and notes it expresses the opinions of the commentator, 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-91-53** The comment states that Impact PH-1 could be reduced to a level below significance by developing the project consistent with the General Plan. The County agrees with this comment. As stated in Chapter 4, Project Alternatives, under Section 4.5, Existing General Plan Alternative, “This alternative would be consistent with the existing General Plan land use designations applicable to the project Site. Therefore, the population induced both directly and indirectly by on-site land uses would not exceed planned growth as contemplated by the County General Plan. Although this alternative would not exceed planned growth, it would still result in approximately 2 million square feet of commercial/office professional land uses that could result in additional indirect growth. This alternative would expand transportation infrastructure that would increase accessibility to the area (i.e., Deer Springs Road would be widened as described further below), resulting in growth-inducing potential. Additionally, this alternative would generate 1,240 fewer Average Daily Trips (ADT) than the proposed project, and would require mitigation to improve the I-15/Deer Springs Road interchange. This alternative would not exceed planned growth for the project. Therefore, this alternative would result in reduced impacts compared to the proposed project.”

**I-91-54** The comment states that the project is inconsistent with the Housing Policies of the General Plan by failing to provide affordable housing, for producing unmitigated population growth impacts, by not providing enforceable mitigation under CEQA, and for contributing to cumulative unmitigated impacts. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no

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more specific response can be provided or is required. As to the project's consistency with the specific General Plan Housing Element Goals and Policies cited in previous comments, please see **Responses to Comments I-91-43** through **I-91-50** above and **Response to Comment O-1-235**. 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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