

I-96 Beverly L and C Wayne Dauber (1)

- I-96-1** 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-96-2** The expresses concern over wildfire and evacuation. The comment addresses general subject areas, which received extensive analysis in the Draft EIR, specifically in Section 2.8 Hazards and Hazardous Materials. In addition, an evacuation plan was prepared as part of the Draft EIR, Appendix N-2. Also, refer to **Topical Response** to Comment (Evacuation). 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-96-3** The comment expresses concern over Deer Springs Road Option A and a bottle neck occurring during an evacuation and speculates that widening the road to four lanes under Option B would not provide much improvement. The comment asks if there is any mitigation for this scenario. The commenter is referred to Topical Response HAZ-1. Further, Appendix N-2 Evacuation Plan, Section 4.2 Roadway Capacities and Maximum Evacuation Time Estimates analyzed both Option A and Option B configurations for determining evacuation times. The County notes that, as shown in Section 2.13, Transportation and Traffic, while Deer Springs Road currently operates at a failing level of service, improvements under Option B would improve the level of service to an acceptable level and reduce impacts on Deer Springs Road to less than significant. 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-96-4** The comment expresses concern over dust and toxic atmospheric content being released due to construction. The comment asks if a health impact analysis has been conducted for the project. A study was included as Appendix F to Health Effects of Respirable Crystalline Silica in Blasting Dust (Appendix G in the Draft EIR),. Analyzing the project's potential impacts attributable to crystalline silica exposure, the Draft EIR determined that “[m]aterials that would be blasted at the proposed project are granitic and similar to those blasted at hard rock quarries. The SCAQMD monitored respirable crystalline silica concentrations near the Azusa Rock Quarry and found that average concentrations were 0.5 µg/m³ or six times less than the reference exposure level (REL). This concentration included emissions from blasting and other construction emission sources on-site. Accordingly, concentrations that nearby receptors would be exposed to [with this project] would be considered acceptable.” (Draft EIR, p. 2.3-50.)

Comment Letter Responses

Further, “because the vast majority of deposited material is too large to be respirable,” “[d]ust that is deposited near sensitive receptors is unlikely to result in exposure to respirable crystalline silica.” (Draft EIR, p. 2.3-49.) In addition, “there are no existing processes taking place or future processes that would take place as part of the proposed project at nearby receptor locations that would reduce the size of particles deposited making them smaller, respirable particles.” (*Ibid.*) Finally, “the small amount of respirable dust that may be deposited would need to be re-entrained into the air in order to be hazardous,” which is unlikely to occur in concentrations sufficient to cause a significant impact. (*Ibid.*)

The Draft EIR determined, on the basis of this evidence, that “deposited crystalline silica is not considered to be a source of significant health risk and impacts would be less than significant.” (Draft EIR, p. 2.3-50.) Even though impacts would be less than significant, the Draft EIR provides mitigation measures M-AQ-11 and M-AQ-12 to further control fugitive dust emissions generated during blasting activities and thereby further minimize crystalline silica exposure. 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-96-5 The comment states that wildlife disappeared during the time new home construction was occurring in Hidden Meadows and asks if a study has been done on the disruption to wildlife. Potential impacts to biological resources, including wildlife, received extensive analysis in the Draft EIR, specifically in Section 2.4 Biological Resources. As described therein, the proposed project would result in potential temporary impacts related to construction, including the following:

Impact W-9 Significant short-term direct impacts to tree-nesting raptors as a result of project construction.

Impacts CWA-1 Significant impacts to an existing core wildlife area from construction-related activities that would result from short-term direct impacts.

Impacts CWA-3 Significant impacts to an existing core wildlife area from construction-related activities that would result from short-term indirect impacts.

Mitigation measures are provided which would reduce these impacts to less than significant, including “**M-BIO-5**, which would provide for avoidance of impacts through setbacks, preconstruction surveys for nesting birds and implementation of nest buffers should nests be found,” and

Comment Letter Responses

“**M-BIO-1, M-BIO-2, M-BIO-3, M-BIO-6, and M-BIO-7.** These mitigation measures require biological monitoring during construction, temporary construction fencing, preparation of a biological monitoring report, revegetation of temporary impacts, and minimization of night and outdoor lighting. Biological monitoring and reporting and temporary fencing would ensure that additional habitat is not impacted during construction, and that the BMPs outlined in the SWPPP are adhered to. Revegetation of temporary impacts would ensure that native vegetation would be restored, thus reducing the potential for invasive species to encroach upon existing native habitat. Minimizing night and outdoor lighting during construction would reduce disruption of nocturnal wildlife movement.”

I-96-6 The comment states that the project site is the first area when traveling on I-15 that appears unspoiled by the effects of civilization, and says the project site is rugged land requiring an enormous amount of excavation to make it usable. 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. No further response is required or necessary.

I-96-7 The comment states that there is and will continue to be inadequate infrastructure to support the development and that there are no public transportation facilities nearby or planned to be nearby. As stated in Section 1.0 Project Description on page 1-20, build out of the Community is anticipated to occur in two phases over approximately 10 years in response to market demands and in accordance with a logical and orderly expansion of roadways, public utilities, and infrastructure. Figure 1-32, Phasing Plan, illustrates the anticipated sequence of planning area development, although sub-areas may not develop in that order. Backbone infrastructure and roadway improvements would be constructed in phases, as needed, to ensure that improvements are in place at the time of need.

Regarding public transportation, as stated in Section 1.0 Project Description on page 1-24, three Sprinter stations are within 6 miles of the project Site: the San Marcos Civic Center Sprinter Station, the Buena Creek Station, and the Palomar College Station. 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-96-8 The comment expresses concern about the project being in a high fire risk area. The comment addresses general subject areas, which received extensive analysis in the Draft EIR, specifically in Section 2.8 Hazards and Hazardous Materials. The

Comment Letter Responses

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-96-9** The comment states that there is no industry or commercial center nearby to provide jobs and that there are no shopping centers, grocery stores, or restaurants nearby, which would add to external vehicle trips. As stated in Section 1.0 Project Description on page 1-24, the project is 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. The Site is also located near Cal State San Marcos and Palomar College, and three Sprinter stations are within 6 miles of the project Site: the San Marcos Civic Center Sprinter Station, the Buena Creek Station, and the Palomar College Station, as shown in Figure 1-34, Proximity to Major Employment Centers.

Regarding the lack of nearby shopping centers, grocery stores, and restaurants, the project includes a Town Center. As stated in Section 1.0 Project Description on page 1-6 the Town Center would be compact and walkable, include commercial retail space, townhomes, and a school site, and provide employment opportunities for future residents and the surrounding area. The Town Center would include 95 residential dwelling units, 81,000 square feet of commercial space, a 6-acre school site, and 5.73 gross acres of parks. 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-96-10** The comment states that there are no schools nearby and none are being provided by the developer. The County disagrees with this comment. As stated in Section 1.0 Project Description on page 1-23, the project has reserved a 6-acre site for a school, which could serve students from the San Marcos Unified School District and Escondido Union School District. If students do not attend a school within the project Site, the project's future students who live in the San Marcos Unified School District boundary are expected to attend Twin Oaks Elementary School, San Marcos Middle School, or Woodland Park Middle School. The project's future students living within Escondido Union School District are expected to attend North Broadway School, Rock Springs Elementary School, or Rincon Middle School. The project's future high school students are expected to attend Mission Hills High School, San Marcos High School, or Escondido High School. The school districts ultimately decide student attendance at the various schools. 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.

Comment Letter Responses

I-96-11 The comment states that there are other locations within the County that the project could go. The comment also states that the project doesn't follow the General Plan and that the County has specific responsibility to follow it. The Draft EIR's Project Description, Land Use and Planning, and Alternatives chapters considers and discloses amendments to the General Plan required by the project, and evaluates the potential impacts of the changes when compared to maintaining existing General Plan land use designations. Based on that analyses, the Draft EIR concludes the project will result in a less-than-significant impact to land use and planning. The Draft EIR also provides a detailed comparison of the project's impacts compared to development under existing General Plan land use designations, finding the project will result in fewer impacts to Transportation and Traffic, Biological Resources, Cultural Resources, Aesthetics and Mineral Resources compared to existing General Plan land use designations. These detailed evaluations are sufficient disclosures under 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.

INTENTIONALLY LEFT BLANK