

O-12 Hidden Meadows Community Sponsor Group

- O-12-1** The comment states that the Hidden Meadows Community Sponsor Group has reviewed the Draft EIR and that there are effects or conditions that would affect the Hidden Meadows community. 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.
- O-12-2** The comment states that the proposed project does not comply with the San Diego County General Plan. The comment restates information from the General Plan, including Guiding Principle #2—“Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development”—and information from the discussion of Guiding Principle #1. The comment states that the proposed project is contrary to the overall intent and specific statements that are the basis of the General Plan, and that the existing infrastructure is inadequate. The comment concludes that the Draft EIR indicates that this will continue after completion of the improvements specified in the Draft EIR. The County does not concur with this comment.

Relative to the general comment about the proposed project’s overall compliance with the General Plan, refer to **Topical Response LU-1**, which addresses how the proposed project would comply with the General Plan. Regarding the more specific comment concerning the proposed project’s compliance with Guiding Principles #1 and #2, refer to Draft EIR Appendix DD, Land Use Consistency Analysis, which discusses the reasons for the determination that the project is consistent with the General Plan and these principles, and Chapter 3.3, Land Use and Planning, of the Draft EIR, which concludes that the proposed project would have a less-than-significant impact relative to consistency with the General Plan.

Relative to the statement regarding existing infrastructure, the County acknowledges that the existing circulation network serving the project Site, specifically Deer Springs Road, is currently operating at a failing level of service (LOS), as indicated in Section 2.13, Transportation and Traffic, of the Draft EIR. However, the County notes that the proposed project includes two options for improving Deer Springs Road, including Option B, which would widen Deer Springs Road to a four-lane road and would result in an acceptable LOS. Section 2.13 concludes that all impacts to street segments and intersections within the County of San Diego’s jurisdiction would be mitigated to less than significant with implementation of recommended mitigation measures; however, impacts to road segments and intersections under the jurisdiction of the City of San Marcos and the California Department of Transportation (Caltrans)

Comment Letter Responses

were conservatively found to be significant and unavoidable because the improvements to mitigate these impacts are within another jurisdiction.

Further, as determined in Section 2.14, Utilities and Service Systems, impacts to infrastructure systems concerning water supply, wastewater/sewer service, and solid waste would be less than significant. The County does not concur, nor does the Draft EIR conclude, that infrastructure would be inadequate with approval of the proposed project.

Since the comment is general and does not raise any specific issue regarding the Draft EIR's analysis, no more specific response can be provided or is required.

O-12-3 The comment states that the General Plan Update reduced the allowable dwelling units from 300 to 99, and that the intent of the General Plan was “to keep the area rural.” The comment states that the proposed project is “not a minor correction,” but a “radical and complete change to the character of the I-15 corridor,” which would be a “total abrogation of the County’s responsibility to follow its own detailed long-term plan.” The comment concludes by stating that the Hidden Meadows Community Sponsor Group believes the Draft EIR should be rejected because it does not comply with the General Plan.

The County does not concur with this comment. Refer to **Topical Response LU-1**; Appendix DD, Land Use Consistency Analysis; and Section 3.3, Land Use and Planning, for a discussion on the proposed project’s compliance with the County General Plan. In addition, as discussed in Draft EIR Section 4.5, Existing General Plan Alternative, and as explained in the responses to **Comment Letter O-1.9**, although the existing General Plan land use designation at the site allows 99 dwelling units, it also allows more than 2 million square feet of general commercial and professional office space. The County directs the commenter to Section 4.5, Existing General Plan Alternative, of the Draft EIR, which compares the Existing General Plan Alternative to the proposed project. Section 4.5.5 of the Draft EIR states the following:

The Existing General Plan Alternative would result in greater significant impacts compared to the proposed project in the following areas:

- Aesthetics
- Biological Resources
- Cultural Resources
- Mineral Resources
- Transportation and Traffic

Comment Letter Responses

The County acknowledges that the comment expresses opposition to the project. 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.

- O-12-4** The comment states that there would be “extreme” traffic impacts due to the proposed project’s proximity to Interstate (I) 15, a major north/south freeway, and Deer Springs Road, a planned, six-lane General Plan Mobility Element roadway, and the I-15/Deer Springs Road intersection, combined with other planned and projected cumulative projects. The comment restates the number of such cumulative projects from the Draft EIR, and notes that the total number of potential units would be at least 12,500 dwelling units.

The comment generally restates information and analysis contained in the Draft EIR concerning potential traffic impacts of the proposed project and cumulative projects. Refer to Section 2.13, Transportation and Traffic, of the Draft EIR for a full evaluation of these impacts, and for the mitigation measures that would be incorporated to reduce these impacts to the greatest feasible extent. Nonetheless, the Draft EIR acknowledges that no feasible mitigation exists for certain traffic impacts, including impacts to certain segments of I-15 and Deer Springs Road, and discloses that such impacts would be significant and unavoidable (Draft EIR pages 2.13-120 to 2.13-126). 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.

- O-12-5** The comment states that the existing I-15/Deer Springs Road interchange is inadequate, that “any approval of the Newland Sierra project should be contingent on approval ... for the interchange,” and that no portion of the proposed project should be occupied until the affected road and interchange improvements are ready to be used. The County concurs with the comment regarding the existing condition of the I-15/Deer Springs Road interchange. The County directs the reader to the Final EIR, which has been revised to clarify that improvements to this interchange would be required prior to the issuance of the 370th and the 640th equivalent dwelling unit certificates of occupancy to mitigate impacts to less than significant. However, as noted in the Draft EIR and the comment, improvements to the interchange are under the discretion of Caltrans, and, thus, such improvements are not under the control of the County of San Diego. Accordingly, as required by CEQA, the Draft EIR concluded that impacts to the interchange would remain significant and unavoidable because implementation of improvements to the interchange are not enforceable by the County.

Comment Letter Responses

With respect to other road improvements, see **Response to Comment O-11-8**, which discusses the timing for certain improvements to Deer Springs Road and Twin Oaks Valley Road.

- O-12-6** The comment expresses concerns about fire evacuation and states that under existing conditions, the community of Hidden Meadows is “essentially [a] single available exit community” that relies on roadways that experience LOS F performance under normal daily operations. The comment requests an evaluation of the cumulative impacts of development along the I-15 and Deer Springs Road corridors during an emergency evacuation of the area.

The County acknowledges the comment and refers the commenter to Section 2.13, Transportation and Traffic, of the Draft EIR, which identifies post-project LOS with implementation of required mitigation. Widening and improving many of the roadways and intersections identified in the comment would improve the LOS of these facilities. Further, the Draft EIR analyzed impacts to emergency evacuation in Section 2.8.3.1, Wildfire Hazards; Section 2.8.3.3, Emergency Response Plans; and Section 2.8.4, Cumulative Impact Analysis (Emergency Response Plans), of the Draft EIR and found that the proposed project would result in a less-than-significant impact to emergency evacuation. The analysis contained in the Draft EIR is supported by Appendix N-2, Wildland Fire Evacuation Plan, of the Draft EIR, which conservatively estimated that “the community can be completely evacuated within 1.5 to 2 hours once notification has been provided.”

In addition, the County refers the commenter to **Topical Response HAZ-1** for a thorough response to the concern regarding cumulative evacuation. As stated in **Topical Response HAZ-1**, although prior evacuations within the project vicinity have experienced traffic congestion, the project would include improvements to Deer Springs Road, which would increase capacity of the main evacuation route compared to the existing condition. Further, when compared to the existing condition, improvements to North Twin Oaks Valley Road and Buena Creek Road would expand the traffic network capacity to assist evacuation efforts for the surrounding communities.

Finally, the County refers the commenter to the responses to **Comment Letter O-1.13**, which address evacuation planning.

- O-12-7** The comment states that the Hidden Meadows Community Sponsor Group prefers Deer Springs Road Option B because of concerns regarding evacuations during Santa Ana-driven wildland fires. The County acknowledges the comment and notes that it expresses support for a component of the project, but does not raise any issue concerning the adequacy of the Draft EIR. The County will include the comment as

Comment Letter Responses

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

- O-12-8** The comment states that previous experience with another project resulted in dust, noise, and incidental property damage as a result of development. The comment states that noise from blasting and rock crushing will have a significant effect during the 10-year buildout. The comment notes that the I-15 and Deer Springs Road corridors are “essentially closed valleys” that trap and prolong these effects and are downwind of the proposed project. The comment notes that no mitigation is provided for these conditions, and concludes by requesting a comprehensive health risk assessment for at-risk older adults and young families as part of the EIR.

The County acknowledges the comment and refers the commenter to **Topical Responses AQ-1, AQ-2, AQ-3, and Noise-1**, which address the duration and schedule of blasting and rock crushing, and associated air quality and noise impacts. As detailed in these responses, the Draft EIR has adequately analyzed the impacts noted in the comment, and no further analysis or mitigation is required under CEQA. Specifically, the Draft EIR considered health risks associated with project construction in Draft EIR Section 2.3.5.3, pages 2.3-44 through 2.3-50, and determined that such impacts would be less than significant. The Draft EIR explains that the modeling assumptions for construction impacts related to diesel particulate matter (DPM) emissions accounted for age sensitivity and other concerns mentioned in the comment (Draft EIR pages 2.3-48 to 2.3-49):

Cancer risk calculations were performed using the HARP 2 RAST by inputting the predicted annual DPM concentrations from AERMOD for the nearest potential on-site residence, which would be the Maximally Exposed Individual Resident, as well as for the nearest off-site resident. Cancer risk parameters, such as age sensitivity factors, daily breathing rates, fraction of time at home, and cancer potency factors were based on the values and data recommended by OEHHA (2015) as implemented in HARP 2. In addition to the potential cancer risk, DPM has chronic (i.e., long-term) noncarcinogenic health impacts. The chronic non-carcinogenic inhalation hazard index for construction activities was also calculated using the HARP 2 RAST. The results of the AERMOD and HARP modeling are provided in Appendix D of the Air Quality Technical Report (Appendix G). The modeled maximum annual concentrations at the maximally exposed future on-site resident (located about 10 meters from the volume sources) and existing off-site resident (located about 30 meters from the volumes sources) are shown in Table 2.3-16, Summary of DPM Concentrations.

Comment Letter Responses

Appendix G, Air Quality Technical Report, of the Draft EIR adds the following: “For the purposes of this assessment, given the less-than-lifetime exposure period [to construction emissions], and the higher breathing rates and sensitivity of children to TACs [toxic air contaminants], the cancer risk calculation assumes that the exposure would affect children early in their lives. For the derived cancer risk calculation under the worst-case scenario, the 10-year (off-site) and 7-year (on-site) exposure durations were assumed to start during the third trimester of pregnancy” (Draft EIR, Appendix G, page 65). Even with these conservative assumptions, construction impacts related to cancer risk were found to be just 0.2 in 1 million to off-site receptors, well below the County’s significance threshold of 10 in 1 million; therefore, this impact would be less than significant (Draft EIR page 2.3-49 and Table 2.3-17).

Likewise, as shown in Table 2.3-18 of Section 2.3, Air Quality, of the Draft EIR, the chronic hazard indices at nearby sensitive receptors would not exceed the County significance threshold of 1.0 for non-carcinogenic health impacts during construction; therefore, the Draft EIR concludes that these impacts would be less than significant. Concerning crystalline silica, Appendix F to Appendix G of the Draft EIR is a Crystalline Silica Analysis that analyzes the potential for silica crystalline that is smaller than 4 microns to be inhaled, and determined that the health risk from crystalline silica is less than significant. See also, Draft EIR pages 2.3-49 through 2.3-50.

Although health risk impacts would be less than significant during construction, the Draft EIR nonetheless recommends mitigation measures M-AQ-2, M-AQ-3, and M-AQ-4 to reduce the project’s construction air quality impacts to the extent feasible; M-AQ-10 to reduce impacts related to construction activity near sensitive receptors; and M-AQ-11 and M-AQ-12 to control fugitive dust emissions generated during blasting activities.

- O-12-9** The County acknowledges the comment and notes that it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment.