

O-13 Pechanga Indian Reservation

- O-13-1** The comment states the letter is written on behalf of the Pechanga Band of Luiseño Indians (Tribe). The comment notes that the Tribe continues to express concerns about the Newland Sierra Project (project or proposed project), including environmental and cultural resource impacts. The comment briefly summarizes the proposed project land uses and improvements, including off-site improvements to Deer Springs Road and the Deer Springs Road and Interstate 15 interchange, “which will have substantial impacts on Luiseno cultural resources, including a Luiseno Traditional Cultural Property (“TCP”) known as *Pávxin*, Native American human remains, and scared area.” The comment addresses general subject areas, which are more specifically and thoroughly addressed below, and which received extensive analysis in the Draft Environmental Impact Report (EIR). The County of San Diego (County) acknowledges the comment as an introduction to the 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-13-2** The comment requests the letter be incorporated into the California Environmental Quality Act (CEQA) record and requests the County notify the Tribe of documents issued and actions related to the project. This comment states that a previous comment letter provided by the Tribe to the County, dated March 16, 2015, was included in the Draft EIR. The County directs the commenter to Appendix A, which includes the comment letters received during the Notice of Preparation (NOP) comment period, including the Tribe’s previously submitted letter. However, the May 26, 2016, letter was not included, since it was not received as part of the standard CEQA NOP comment period. The County notes that both letters are included in the Final EIR for review and consideration by the decision makers prior to a final decision on the project.
- O-13-3** The comment states that *Pávxin* is the name of a Luiseño TCP within and adjacent to the area of potential effect for the project Site and within the area of potential effect for the off-site Deer Springs Road improvements. The comment restates information contained in the Draft EIR 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 or necessary.
- O-13-4** The comment states that the *Pávxin* is an historical resource under state law. The comment restates information contained in the Draft EIR. The comment also states that *Pávxin* is “a Tribal Cultural Resource as defined in CEQA.” The County notes that tribal cultural resources, as a legal category under CEQA, was established

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- through the enactment of Assembly Bill 52, which took effect on July 1, 2015. As the NOP for the project was filed prior to July 1, 2015, Assembly Bill 52 does not apply to this project, and therefore, consideration of tribal cultural resources is not required for the project.
- O-13-5** The comment states that *Pávxin* is significant because it is an ethnographic landscape that is thousands of years old. The comment also indicates that *Pávxin* is an area where ceremonial traditions, healings, and religious gatherings were conducted. The comment further states that *Pávxin* contains cultural value elements and resources that are part of current traditions, ceremonies, and value systems essential to the identity and sovereignty of the Tribe. The comment concludes that *Pávxin* was a major regional hub for Luiseño ceremonies and a central meeting point and is the largest, most extensive, and unique inland commercial area connected to the coast. The County acknowledges the comments and notes that it restates information contained in the Draft EIR 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 or necessary.
- O-13-6** The comment states that *Pávxin* is listed in the Sacred Lands File with the California Native American Heritage Commission. The comment does not provide any new information regarding resources or other issues regarding 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. No further response is required or necessary.
- O-13-7** The comment states that thousands of cultural and sacred items have previously been unearthed through non-tribally sanctioned archaeological excavations in the vicinity of the project while thousands of items still remain on the project Site. The County acknowledges the comment and notes that it restates information contained in the Draft EIR 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 or necessary.
- O-13-8** This comment states that there have not been thorough archaeological investigations performed to date for the entire project Site, and therefore, it is unknown how many additional resources may still be present. The County does not concur with this comment. As discussed in the Draft EIR and in supporting technical documents, the entire project Site was subject to intensive inventory using standard archaeological methods in accordance with the County and Secretary of the Interior guidelines.

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Areas that were not accessible by foot were surveyed using high-resolution aerial imagery; these images were provided to consulting tribes so they could point out areas of interest, which were then targeted through additional survey efforts. Moreover, survey crews from Dudek accompanied tribal monitors supplied by the Tribe and the San Luis Rey Band of Luiseños, with tribal monitors agreeing that pedestrian surveys were not possible in the densely vegetated areas. Evaluation excavations have been performed for resources that were not previously assessed for significance under the CEQA Guidelines and County guidelines. Cultural resource identification (i.e., survey) and evaluation efforts cannot always (and rarely ever) identify all resources, since these efforts are only performed with the aim of sampling the resources. The County determined that the archaeological investigations performed for the project Site satisfy CEQA and constitute a good-faith effort to identify and evaluate cultural resources on the Site in order to determine significant effects on the environment. Because additional resources and artifact may remain on site, the project has been conditioned with mitigation measures to identify, evaluate, recover, and protect unidentified resources that may be present.

O-13-9 The comment states that more detailed information containing the Tribe’s expertise on these culturally affiliated resources has been included in confidential submittals to the County and that a general summary has been included in the Draft EIR. The County acknowledges the comment; however, it restates information contained in the Draft EIR 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 or necessary.

O-13-10 The comment states that the proposed project would result in damage to unique archaeological resources and would cause a substantial adverse change in the significance of historical resources. The comment notes these effects have been demonstrated in the Cultural Resources Report, the Tribe’s previously submitted comments, ethnographic information, maps, and in-person tribal consultations and through comments and consultations between other culturally affiliated tribes and the County. The comment states that the Tribe and the project archaeologist have “demonstrated the identity, location, nature, traditional use, and continued cultural use and value of the archaeological resources and the historical resources affected by the proposed Project through their respective reports.” The comment identifies three impacted locations from the Draft EIR (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822), which were determined to be “unique archaeological resources” under CEQA and subject to treatment and mitigation. The County acknowledges the comment, and notes that it restates information contained in the Draft EIR regarding the significance of known cultural resources and does not raise a new environmental issue within the

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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 or necessary.

- O-13-11** The comment provides a summary of CEQA mitigation preferences for “unique archaeological resources” and describes why such treatment preferences are important. The comment notes that avoidance and preservation in place, if feasible, is the preferred form of treatment and that other examples of treatment include (1) planning construction to avoid archaeological sites; (2) deeding archaeological sites into permanent conservation easements; (3) capping or covering archaeological sites with a layer of soil before building; or (4) planning parks, green spaces, or other open space to incorporate archaeological sites. This information is consistent with CEQA Guidelines, Section 15126.4(c). The comment further explains that preservation in place and avoidance are the preferred treatment options, primarily because of the unique nature of such resources. The County notes that the mitigation measures recommended in the Draft EIR are consistent with the CEQA Guidelines, including the preference for preservation and place and avoidance where feasible. The County would also like to point out that the mitigation measures recommended in the Draft EIR were developed through extensive consultation, dialogue, and negotiation with the affected tribes, including the Tribe. The comment restates that these sites include “items of significant tribal cultural value.” The comment does not provide any new information regarding resources or the project. The comment is introductory in nature to establish context for discussions in subsequent comments.
- O-13-12** The comment states that the Tribe agrees with the determination in the Draft EIR that the resource *Pávxin* is eligible for listing in the state historic register and is significant under CEQA. No further response is necessary or required.
- O-13-13** The comment notes that pursuant to CEQA, if a project would cause a substantial adverse change in a significant historic resource, like the TCP known as *Pávxin*, then public agencies shall seek to avoid damaging effects whenever feasible. The County acknowledges the comment and notes that it restates a CEQA requirement that public agencies should seek to avoid impacts to significant archaeological resources whenever feasible. As demonstrated by design changes, avoidance of significant archaeological deposits was achieved in full or in part by the proposed project, as required. However, as noted in **Response to Comment O-13-11**, avoidance and preservation in place are not the only treatment options for archaeological sites. Accordingly, Section 2.5, Cultural Resources, includes several mitigation measures to ensure impacts to cultural resources are mitigated to less-than-significant levels. In addition, as noted in **Response to Comment O-13-11**, the mitigation measures recommended in the Draft EIR, including those intended to address impacts to

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Pávxin, were developed through extensive consultation, dialogue, and negotiation with the affected tribes, including the Tribe.

- O-13-14** The first part of the comment restates that preservation in place is the preferred mitigation of impacts to significant resources, and explains why preservation in place is preferred, notably to maintain the relationship between artifacts and the archaeological context and to avoid conflicts with religious or cultural values of groups associated with the Site. The second part of the comment discusses the important elements of the resource *Pávxin*, which the comment notes includes the specific physical location and context of this geographical place that was used for ceremonial and sacred activities. The County acknowledges the comments and cultural elements and landscapes of *Pávxin*, which are discussed in the Draft EIR and supporting technical documents. No further response is necessary or required.
- O-13-15** The comment states that significant impacts would occur to *Pávxin* as a result of improvements along Deer Springs Road, and that any impacts would materially impair the TCP because they would demolish and materially alter the essential characteristics of the Site. These impacts are discussed in the Draft EIR and supporting technical documents. Moreover, after extensive consultation and negotiations with the applicant and the affected tribes, including the Tribe, the County has developed mitigation measures that adequately reduce impacts to *Pávxin* to less-than-significant levels. These mitigation measures are set forth in the Draft EIR. No further response is necessary or required.
- O-13-16** The comment states that the proposed project would have significant, direct impacts to *Pávxin* by unearthing the physical resources that compose the TCP, taking them out of provenience and context, and destroying them through ground-disturbing activities. These impacts are discussed in the Draft EIR and supporting technical documents. Moreover, after extensive consultation and negotiations with the applicant and the affected tribes, including the Tribe, the County has developed mitigation measures that adequately reduce impacts to *Pávxin* to less-than-significant levels. These mitigation measures are set forth in 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.
- O-13-17** The comment describes the non-tangible aspects of *Pávxin* as holding special values relating to tribal identity. The comment also indicates that implementation of the project would inhibit the Tribe's ability to pass on cultural knowledge through the experience of time and place. The comment states that the area holds great spiritual and cultural significance because the Tribe's traditional practices and ceremonies

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- were carried out here and “continue to live here because of their ties to contemporary Luiseno identity.” The comment further states that tribal cultural identity is intrinsically tied to the land and that it is imperative that the County assess “the impacts to the cultural values of the resources, including the loss of knowledge that our people will experience as a result of this project and associated improvements.” The County will include the comment as part of the Final EIR; however, these impacts are discussed in the Draft EIR and supporting technical documents. The County, after extensive consultation with the tribes (including the Tribe) and the applicant, has developed mitigation measures, including the establishment of a reburial area, that address concerns identified in this comment.
- O-13-18** The comment begins by describing and summarizing CEQA considerations for cumulative impacts. The comment notes that cumulatively considerable means whether an incremental effect of an individual project would be significant when viewed in connection with the effects of other projects. The comment notes the increased population in the project vicinity as a result of the proposed project and discusses the cumulative effects of the project on cultural resources, including *Pávxin* as a TCP, and concludes that the project and improvements to Deer Springs Road contribute to the total loss of the physical resources and the Tribe’s sense of place on the landscape. The comment concludes that it is “also the cumulative impacts over time to these connected, finite, and irreplaceable resources” that must be considered in addition to direct and indirect impacts. The County will include the comment as part of the Final EIR; however, the Draft EIR discusses cumulative impacts on cultural resources within the cumulative study area and analyzes whether the project’s contribution to such impacts, both before and after mitigation, is cumulatively considerable. As a result, the Draft EIR complies with CEQA’s analytical requirements regarding cumulative impacts. In addition, the Tribe’s ethnography was included as a confidential attachment to the Draft EIR for the purpose of providing additional mitigation to lessen cumulative impacts to a level below significance.
- O-13-19** The comment notes that the Tribe’s preference is for the proposed project not to be approved but then describes the Tribe’s negotiations with the applicant and County to address impacts to cultural resources. The County acknowledges the comment letter and notes it expresses general opposition for the project but does not raise an issue concerning the adequacy of the Draft EIR. The County would add that the negotiations described in the comment were critical to the development of the mitigation measures recommended in the Draft EIR and that the mitigation measures reflect the agreements reached during those negotiations.
- O-13-20** The comment indicates that the Draft EIR must state that project would cause a substantial adverse change to a historic resource and have a significant effect on the

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environment. The comment addresses general subject areas that received extensive analysis in the Draft EIR. 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.

Nonetheless, the County does not concur with this comment. As stated in the Draft EIR, the proposed project would result in potentially significant impacts to cultural resources. Section 2.5 identifies feasible mitigation measures which would reduce impacts to cultural resources to less than significant with implementation. No further comment or response is needed.

- O-13-21** The comment states that the social effects of destroying significant tribal places would impact the resources themselves and also affect the Tribe's lifeways, practices, religion, identity, and sovereignty. The comment notes that such considerations should be taken into account, and an EIR should analyze the physical effects of a project and how they may directly lead to a cause-and-effect reaction that would result in social effects. The comment provides an example for the project, stating that it would cause the loss of the tribal government's ability to sustain their connectivity with their aboriginal lands and knowledge. The comment concludes that this is a significant impact that prevents the Tribe from practicing its value systems, religion, lifeways, and essential components of self-determination and identify. The comment requests these effects be included, assessed, and considered. In response, generally speaking, CEQA does not require that EIRs analyze social or economic impacts of a project, except to the extent that those impacts result from physical changes caused by the project in question. In this case, the Draft EIR considered and analyzed the proposed project's physical impacts on cultural resources, as well as the social effects resulting from those physical impacts. Specifically, the Draft EIR acknowledged that the proposed project's impacts on the three significant archaeological sites (CA-SDI-4558, CA-SDI-5951, and CA-SDI-9822), as well as the impacts on *Pávxin*, would have potentially significant effects on tribal history and cultural practices. One of the primary purposes and functions of the reburial area is to address these social effects.
- O-13-22** The comment states that the mitigation measures reduce the impacts but do not avoid impacts. The County acknowledges this to be true and holds the position that the negotiated and required mitigation reduces impacts to a level below significance.
- O-13-23** The comment states that while the impacts are lessened by the proposed mitigation, the impacts remain significant. The County's position is that the proposed mitigation adequately reduces project impacts to a level below significance. Some of the mitigation measures represent good-faith agreements among the County, the tribes,

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and the applicant. These mitigation measures, while non-standard, reflect a collective and coordinated effort to address the tribes' concerns.

- O-13-24** The comment states that *Pávxin* would be destroyed forever and that agreed upon mitigation was a “submission under protest” by the Tribe. The comment concludes that the proposed project would not only “desecrate a religious and ceremonial site, but the proposed mitigation simply will never fulfill culturally appropriate treatment with apt dignity and will . . . irreversibly and significantly impact tribal identity, sovereignty, and self-determination.” The County does not concur that the proposed project would “irreversibly” damage and “destroy forever” the historical resource known as *Pávxin* because more than 60 percent of CA-SDI-9822 and CA-SDI-5951 have been avoided through redesign by incorporating a soldier pier retaining wall in those areas, and by complete avoidance of the significance-bearing portions of CA-SDI-4558. Moreover, the character of the drainage that holds these resources is largely preserved as biological conservation areas. Therefore, the County disagrees that *Pávxin* would be impacted as described in this comment. The County also disagrees that the Tribe’s agreement to the mitigation measures was a “submission under protest.” During the extensive consultation and negotiation process that resulted in the agreed upon mitigation measures, the Tribe’s representatives never stated they were submitting to the agreement under protest.
- O-13-25** The comment states that impacts to *Pávxin* require a statement of overriding considerations in the Draft EIR “which reflects the ultimate balancing of competing public objectives.” The comment notes the County “already requires an override analysis and documentation” for other impact areas (including aesthetics, air quality, mineral resources, noise, population and housing, transportation and traffic) and asserts that “cultural and archaeological resource impacts cannot be brought to a level below significance for this Project, even with the proposed mitigation measure.” The County disagrees because proposed mitigation has been designed to reduce impacts to cultural resources to a level below significance. Therefore, there is no requirement under CEQA to include a statement of overriding considerations for project impacts on cultural or tribal resources.
- O-13-26** The comment provides factual background on the County’s Resource Protection Ordinance (RPO) and states that the identified cultural resource, *Pávxin*, is protected under the County RPO. The comment notes that previous archaeological work on the Site has “produced a significant volume and range of materials.” The comment concludes that the County RPO prohibits “development, trenching, grading, clearing and grubbing, or any other activity or use damaging to significant prehistoric or historic site lands.” The County acknowledges that the resource would ordinarily qualify for RPO protection. However, impacts to *Pávxin* occur as a result of

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improvements to Deer Springs Road, which are considered an essential public project. Essential public projects are exempt from the County RPO.

- O-13-27** The comment states that the Tribe is aware that under the County RPO, essential projects may be exempt. The comment adds that “a housing development of this nature is not an essential project” and that “lack of housing or a need for more housing in north county San Diego does not directly correlate to this particular project in this particular place.” The comment concludes that the Tribe “has yet to be shown the County’s analysis and reasoning as to how they arrived at the conclusion that this is an essential project triggering an exemption under the RPO.” The County acknowledges that the project is not an essential project. However, the reason impacts to *Pávxin* are exempt from the County RPO is because the impacts result from long-planned improvements to Deer Springs Road. These improvements were identified as a component of the Mobility Element of the County’s 2011 General Plan Update and are considered an essential public project. In short, it is the widening of Deer Springs Road that meets the definition of an essential project and that provides for an exemption to the County RPO.
- O-13-28** The comment describes the Tribe’s opinion that the County failed to provide an exemption to the Mobility Element for prior developments on the west side of Interstate 15 on Deer Springs Road. The comment does not raise any issue as to the adequacy of the Draft EIR. Therefore, no further response is required.
- O-13-29** The comment states that it appears that the County is “picking and choosing” which rules, ordinances, and regulations to follow “at the expense of unfairly impacting tribal cultural resources and tribal governments.” The comment further notes that because the proposed project includes a General Plan Amendment, the treatment of the project Site from a policy planning perspective is a ripe issue that was not addressed with the approval of the General Plan. The comment concludes that there is an obligation and opportunity to protect tribal cultural resources under the County RPO and the General Plan; however, for reasons the Tribe does not understand, “the County is not upholding these local policies.” The comment expresses the opinions of the commenter regarding County policies and practices. It does not raise any issue as to the adequacy of the environmental analysis set forth in the Draft EIR. Therefore, no further response is required.
- O-13-30** The comment states that there have been two arguments made in similar situations invoking environmental justice issues pursuant to state and federal law. The comment then references Attachment B, California Attorney General Kamala Harris’s Environmental Justice Fact Sheet. The comment states that that “environmental justice” means “the fair treatment of people of all races, cultures, and incomes with

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- respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” The comment does not raise any issue as to the environmental analysis set forth in the Draft EIR. Further, the comment provides no evidence that the Proposed Project or the County’s assessment of its environmental impacts violates any law, regulation, or policy regarding environmental justice as defined in the Environmental Justice Fact Sheet or any other related document. Thus, no further response is required.
- O-13-31** The comment states the proposed project includes a geographical area that is culturally affiliated with California tribal governments and that previous proposals have been denied twice. The comment suggests that these denials send “an overwhelming message that planning policy for this area should reflect the citizen and stakeholder desires to maintain low density, the rural nature of the area, and no major road expansions.” The comment further states that the County “insists on spending public money and resources” to allow for the review of projects in conflict with the citizen’s democratic input and the County’s obligations to the environment and citizen groups and stakeholders. The comment concludes that it is the County’s obligation to protect the significant resources in its jurisdiction. The comment expresses the opinions and policy preferences of the commenter. It does not raise any issue as to the adequacy of the environmental analysis set forth in the Draft EIR. Therefore, no further response is required.
- O-13-32** The comment states that the County should uphold its regulations of the “RPO’s prohibition on impacts to significant prehistoric and historic sites, rather than creating exemptions that are not based in equitable policy.” The comment expresses the opinions and policy preferences of the commenter. It does not raise any issue as to the adequacy of the environmental analysis set forth in the Draft EIR. Therefore, no further response is required.
- O-13-33** The comment states that the “project will cause a substantial adverse change to a Historic Resource and, therefore will have a significant effect on the environment.” The County agrees that the project would cause such a change; however, the project has been conditioned with mitigation measures that reduce those impacts to a less-than-significant level, in addition to various other forms of mitigation that were not required under CEQA or County guidelines.
- O-13-34** The comment states that the Tribe does not believe the proposed project is appropriate for the geographic area and that the County “is remiss in its obligations to protect significant cultural resources pursuant to State law and their own RPO Ordinance.” The comment restates positions described earlier in the comment letter.

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- The comment does not raise any new CEQA issue not already addressed in an earlier response. Therefore, no further response is required.
- O-13-35** The comment states that the Tribe is “of the position that a Statement of Overriding Considerations must be done for historic resources, especially given the social effects of this Project on culturally affiliated tribal governments.” The County does not concur with this comment because the proposed project has incorporated mitigation measures to reduce impacts to cultural resources to less than significant, as concluded in Section 2.5 of the Draft EIR.
- O-13-36** The comment notes the Tribe’s participation in the project through consultation in order to protect resources through drafting mitigation measures in the Draft EIR, and requests that consultation continue between the Tribe, County, and applicant. The County recognizes the Tribe’s valuable contribution regarding the identification and evaluation of cultural resources, impacts to those resources, and identification of mitigation measures to limit impacts to those resources if the project is approved. The County agrees to continue consultation during the Draft EIR review process with the Tribe.
- O-13-37** The comment provides contact information for the commenter. The County acknowledges the comment and notes it provides concluding remarks that do not raise new or additional environmental issues concerning the adequacy of the Draft EIR. For this reason, the County provides no further response to this comment.
- O-13-38** The comment is the Tribe’s May 26, 2016, comment letter on the NOP for the proposed project. First, CEQA does not require responses to comments on the NOP (see CEQA Guidelines, Sections 15082 and 15083). CEQA only requires that a lead agency evaluate and provide written responses to comments on the Draft EIR (California Public Resources Code, Section 21091(d); CEQA Guidelines, Sections 15088(a), 15132). However, early consultation with the public is recommended by the CEQA Guidelines to help promptly resolve disputes over the scope and content of the Draft EIR to be prepared. Accordingly, the County sought public and agency input, and NOP comment letters were reviewed and considered during preparation of the Draft EIR. The NOP comment letters also were made part of the publicly circulated Draft EIR and can be found in Appendix A of the Draft EIR.

Second, each section of the Draft EIR summarizes the concerns raised in response to the NOP, and these concerns were addressed throughout the Draft EIR. These are generally referred to on the first page of each section of the Draft EIR, including on the following pages: 2.1-2 (Aesthetics), 2.2-1 (Agricultural Resources), 2.3-1 (Air Quality), 2.4-1 (Biological Resources), 2.5-1 (Cultural Resources), 2.6-1 (Geology and Soils), 2.7-1 (Greenhouse Gas Emissions), 2.8-1 (Hazards and Hazardous

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Materials), 2.9-1 (Mineral Resources), 2.10-1 (Noise), 2.11-1 (Paleontological Resources), 2.12-1 (Population and Housing), 2.13-1 (Transportation and Traffic), 2.14-1 (Utilities and Service Systems), 3.1-2 (Energy), 3.2-1 (Hydrology and Water Quality), 3.3-1 (Land Use and Planning), 3.4-1 (Parks and Recreation), 3.5-1 (Public Services), and 4-4 through 4-6 (Alternatives).

Third, at the time the NOP comments were submitted, the Draft EIR had not yet been prepared; therefore, the NOP comments could not and did not raise concerns regarding the adequacy of the information presented in the Draft EIR. Accordingly, no further response is required or necessary.

- O-13-39** The comment is an Environmental Justice Fact Sheet from former California Attorney General Kamala Harris. The County has reviewed and considered the comment and the cited document and determined the documents do not raise a specific issue with the adequacy of the analysis contained with the Draft EIR. See **Response to Comment O-13-30**.