

### **O-10 Escondido Chamber of Citizens (ECOC)**

- O-10-1** The comment states that the Escondido Chamber of Citizens is in full agreement with the positions taken by the Sierra Club, the Endangered Habitats League, the Golden Door, and the San Diego Chapter of the Native Plant Society.

The County acknowledges the comment as an introduction to comments that follow. The County notes that the comment expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. 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-10-2** The comment states that the Escondido Chamber of Citizens stands firmly against the “exemptions” to the General Plan. The comment states that the County spent millions of dollars on the General Plan and down-zoned the property to 99 units from 200 units. The comment states that the project would include 2,135 units plus a commercial zone.

The County acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Further, the comment addresses general subject areas that received extensive analysis in the Draft EIR, which is summarized in this response. As described in Section 1.6.1, General Plan and Zoning Amendment, and shown in the Draft EIR Table 1-11, the existing General Plan land use designations would allow approximately 99 residential dwelling units and 2,008,116 square feet of commercial space on the project Site. The project proposes to instead develop 2,135 single-family and multi-family residences, a Town Center (consisting of a maximum of 81,000 square feet of neighborhood-serving commercial uses), a 6-acre school site, and more than 35 acres of park uses, while preserving approximately 1,209 acres on Site and 212 acres off Site as open space (for a total Preserve of 1,421 acres, or 72 percent of the project Site) (Draft EIR pages 1-2 and 1-3). The Draft EIR thus acknowledges that the project would develop more residences than permitted by the existing General Plan land use designations, but would develop substantially less commercial space and retain more open space than allowed under existing General Plan designations.

The Draft EIR details that project development would require amendments to the General Plan, including a General Plan Amendment to amend the North County Metropolitan Subregional Plan Map from existing General Commercial, Office Professional, Semi-Rural 10, and Rural Land 20 designations to Village Core Mixed Use, Semi-Rural 1, and Open Space Conservation (Draft EIR Section 1.6, Project

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Inconsistencies with Applicable Regional and General Plans, pages 1-29 through 1-32).

With these General Plan Amendments, the Draft EIR finds that the project would be consistent with the General Plan. The Draft EIR evaluates the project's consistency with the General Plan in detail in Section 3.3, Land Use and Planning (see Section 3.3.3.2, Conflict with Plans, Policies, and Regulations, page 3.3-21) and Appendix DD, Consistency Analysis. In undertaking this consistency evaluation, the Draft EIR analyzes whether the project is consistent with each of the "Guiding Principles" and policies of the County of San Diego General Plan (2011) and North County Metropolitan Subregional Plan. Based on this detailed review, the Draft EIR concluded that the project is consistent with the General Plan, and potential impacts from conflicts with the General Plan would be less than significant (Draft EIR, pages 3.3-21 through 3.3-36 and 3.3-38).

In addition to evaluating the project's consistency with the Guiding Principles and policies of the General Plan, the Draft EIR directly compares the proposed project land uses to the existing General Plan land uses in Section 4.5, Existing General Plan Alternative (Draft EIR page 4-16). Although the Existing General Plan Alternative would reduce some impacts compared to the project, Section 4.5.5 of the Draft EIR determined that the Existing General Plan Alternative would actually result in greater significant impacts to transportation and traffic, biological resources, cultural resources, aesthetics, and mineral resources (Draft EIR page 4-24).

Specific to transportation and traffic, although the Existing General Plan Alternative would generate 1,240 fewer average daily trips compared to the project, the Existing General Plan Alternative "would result in greater impacts to Deer Springs Road from Mesa Rock Road to Twin Oaks Valley Road, greater impacts to Buena Creek Road between Twin Oaks Valley Road and Monte Vista Drive, and greater impacts to North Twin Oaks Valley Road. Additionally, under this alternative, Sarver Lane would need to be improved to the County's Rural Residential Road standards with a 48-foot-wide right-of-way" (Draft EIR page 4-22). Further, "this alternative would require a new interchange at the I-15/Deer Springs Road interchange, and improvements to Camino Mayor," and "impacts to Caltrans and San Marcos facilities (the I-15 interchange, freeway mainline, and Twin Oaks Valley Road), impacts to the intersection of Robelini Dr./S. Santa Fe Ave., and impacts to the segment of S. Santa Fe Ave. between Robelini Dr. and Buena Creek Rd. would remain significant and unavoidable" (Draft EIR page 4-22). The Existing General Plan Alternative would, thus, result in greater significant transportation and traffic impacts compared to the proposed project.

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For biological resources, when compared to the project, the Existing General Plan Alternative would result in a decrease of open space Preserve area by approximately 273 acres, and a related increase in disturbed area by the same acreage (Draft EIR pages 4-16 and 4-18). Furthermore, only 2.4 acres of private parks would be provided under the Existing General Plan Alternative compared to more than 30 acres proposed by the project (Draft EIR page 4-16). The Existing General Plan Alternative would also impact wildlife through development of a commercial area on the southern portion of the project Site (Draft EIR page 4-18).

The Draft EIR also found that impacts to cultural resources would be greater with the Existing General Plan Alternative, since cultural resources sites that would be avoided by the proposed project would be “fully impacted by commercial land uses” (Draft EIR page 4-18).

The Draft EIR also notes that, although the Existing General Plan Alternative would be consistent with General Plan land use designations, it would “not provide for the same share of projected population growth (99 residential units compared to 2,135 residential units); create a range of housing types; promote health and sustainability through a mixed-use development pattern; or provide and support a multi-modal transportation network” (Draft EIR page 4-20). The Existing General Plan Alternative would result in similar land use and planning impacts as the proposed project (Draft EIR page 4-20).

In summary, Draft EIR Chapter 1, Project Description; Section 3.3, Land Use and Planning; and Chapter 4, Alternatives, consider and disclose amendments to the General Plan required by the project, and evaluate the potential impacts of the changes when compared to maintaining existing General Plan land use designations. The Draft EIR concludes that the project would result in less-than-significant impacts 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 that the project would 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. Since the comment does not raise any specific issue regarding the Draft EIR’s analysis, no more specific response can be provided or is required.

- O-10-3** The comment states that the proposed project disregards the General Plan and corrections need to be made and then the Draft EIR should be recirculated. The County does not concur with this comment. The County acknowledges that the comment expresses the opinions of the commenter and is an introduction to

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comments that follow. Please see **Responses to Comments O-10-4** through **O-10-12**. 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-10-4** Citing CDFW/USFWS Land Planning Alternative A and CDFW Land Planning Alternative C, the comment states that the Draft EIR fails to consider acceptable environmental alternatives that would preserve substantial open space and enhance habitat conservation through the permanent dedication and management of open space. The comment states that the proposed project would result in over 30 acres of required preserved habitat per the General Plan.

CEQA does not require that a lead agency explore all possible alternatives. Rather, Section 15126.6 of the CEQA Guidelines states the following:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to the project.

Therefore, the Draft EIR is only required to consider a reasonable range of alternatives that would avoid or lessen significant impacts associated with a project. Table 4-1 in Chapter 4 compares the impacts of the alternatives to those of the proposed project, and demonstrates that six of the nine alternatives would reduce or lessen an impact compared to the proposed project.

Five of the alternatives considered in the Draft EIR (Chapter 4) would result in a greater amount of open space when compared to the proposed project: the Multi-Family Town Center Alternative, the No Project (No Build) Alternative, CDFW/USFWS Land Planning Alternative A, CDFW Land Planning Alternative B, and CDFW Land Planning Alternative C. The County further notes that the three California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) alternatives were evaluated because they were recommended by those agencies, consistent with CEQA's directive that responsible or trustee agency should provide a response on the Notice of Preparation that identifies significant environmental issues and reasonable alternatives (CEQA Guidelines 15082(b)(1)(A)).

Specifically concerning the CDFW/USFWS alternatives, CDFW/USFWS Land Planning Alternative A would increase open space by approximately 237 acres, CDFW Land Planning Alternative B would increase open space by approximately

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214 acres, and CDFW Land Planning Alternative C would increase open space by approximately 223 acres. The disturbed area with each alternative would respectively decrease (Draft EIR Sections 4.10 through 4.12). Therefore, the County disagrees with the comment's implication that the Draft EIR did not consider alternatives that would preserve substantial open space and enhance habitat conservation.

**O-10-5** The comment states that the planning agreement with the natural resource agencies is violated in the Draft EIR and is not consistent with the Draft North County Multiple Species Conservation Program (MSCP). The County does not concur with this comment for the following reasons.

As summarized in the Draft EIR, “the proposed project would not preclude or prevent the preparation of the subregional NCCP [Natural Communities Conservation Program] because the project has been planned in accordance with the planning principles of the draft North County [MSCP] Plan” (Draft EIR page 2.4-82). As detailed in the Draft EIR, the project has been identified as a proposed hardline area in the Draft North County MSCP Plan, which means that the project's development areas and biological open space areas have been incorporated into the overall conservation strategy of the Draft North County MSCP Plan (Draft EIR pages 2.4-6 and 2.4-82). The Draft EIR states that, based on the proposed hardline area shown for the Draft North County MSCP, the project's proposed biological open space would assemble approximately 1,209 acres of on-site habitat into three cohesive, contiguous blocks and an additional off-site block of habitat totaling 212 acres (providing habitat value for proposed MSCP Covered Species), and would protect the biological open space from future encroachment through habitat management and land stewardship in perpetuity. The project has been designed in accordance with this proposed hardline area (see Draft EIR Figure 2.4-4, and Draft EIR page 2.4-82).

In addition, the project has been designed in accordance with objectives, principles, and conservation goals established in the Draft North County MSCP Plan (Draft EIR page 2.4-82). The Draft EIR evaluates the project's consistency with the eight preliminary conservation objectives from the Draft North County MSCP Plan. The Draft EIR finds that the project would be consistent with these preliminary conservation objectives (Draft EIR page 2.4-83, Table 2.4-26).

The Draft EIR also evaluates the project against, and finds the project consistent with, “preserve design principles” established for interim project review while the Draft North County MSCP Plan is being prepared (Draft EIR pages 2.4-83 through 2.4-87). These principles include providing long-term biological benefit through on-site open space preservation, protecting on-site open space habitat of equal or greater value as that habitat being impacted, contributing on-site open space to regional conservation

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efforts, maintaining biological diversity through open space design, maintaining habitat connectivity between areas of high-quality habitat through open space design, protecting the most sensitive resources to maximize long-term viability, and minimizing edge effects and habitat fragmentation. Consistency with each Preserve design principle is addressed in the Draft EIR on pages 2.4-83 through 2.4-87.

The project was also evaluated for consistency with the Draft North County MSCP Plan's proposed conservation goals for the area that are applicable to the project Site (the San Marcos–Merriam Mountains Core Area) (Draft EIR pages 2.4-88 through 2.4-89). Conservation goals for this area include the following (Draft EIR pages 2.4-88 through 2.4-90):

- a) Conserve oak woodlands, coastal sage scrub (particularly in Twin Oaks) to maintain populations and connectivity of coastal California gnatcatcher and other coastal sage scrub-dependent species, and chaparral on mafic or gabbro soils that support sensitive plant species, such as chaparral beargrass and Parry's tetradymium, San Diego thornmint (particularly in San Marcos Mountains), or California adolphia;
  - b) Ensure that a core community of coastal California gnatcatcher and other coastal sage scrub-dependent species remains in the coastal sage scrub block in Twin Oaks;
  - c) Conserve the north-south connectivity of coastal California gnatcatcher habitat along I-15 between the Riverside County line and the City of Escondido. Maintain the east-west connectivity of natural habitats on either side of I-15 for dispersal of coastal sage scrub community birds;
  - d) Conserve the riparian and upland habitats of Gopher Canyon Creek for water quality and sensitive species, such as southwestern pond turtle and least Bell's vireo; and
  - e) Ensure the San Diego thornmint population in the Palisades open space preserve is maintained and enhanced, if practicable.

The Draft EIR found that the project would be consistent with each of these draft conservation goals (Draft EIR page 2.4-90). Finally, the Draft North County MSCP Plan is not an approved, adopted plan. Instead, it is a draft document, and CEQA does not require an agency to speculate on the future environmental consequences of a project where an environmental plan is still in draft form and is not yet adopted. In *Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1144, the Court of Appeal considered whether the City of Chula Vista had erred in failing to

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include in its Program EIR an analysis of the project's impact on a draft conservation plan in south San Diego County. The court held that draft plans did not need to be included in CEQA analysis since "there is no express legislative or regulatory requirement under CEQA that a public agency speculate as to or rely on proposed or draft regional plans in evaluating a project." Rather, CEQA only requires applicants and public agencies to "engage in analysis of the impacts of the proposed project on the environment" (see page 1,145 of the ruling).

Thus, the Draft EIR has fully complied with CEQA in evaluating and disclosing the project's potential impacts relative to the Draft North County MSCP Plan. The project also has incorporated the Draft North County MSCP Plan into the project's design. The open space Preserve system created by the project would, thus, be consistent with the Draft North County MSCP Plan, serve as open space for the future establishment of a regional North County habitat preserve, and comply with regional open space planning.

Draft EIR Section 2.4, Biological Resources, demonstrates that the project has been planned consistent with the Draft North County MSCP Plan and with regional conservation goals in mind. Based on the analysis contained in the Section 2.4, Biological Resources, the project would result in less-than-significant impacts, since the project would not preclude or prevent completion of the North County MSCP.

**O-10-6** The comment states that the Draft EIR fails to adequately cover all impacts to wildlife. The County does not concur with this comment. The comment raises a general subject area, biological resources, that received extensive analysis in the Draft EIR, specifically in Section 2.4, Biological Resources, and Appendix H, Biological Resources Technical Report. The County notes that the comment expresses the opinions of the commenter, and does not specifically state which impacts to wildlife were not addressed in the Draft EIR. Since the comment does not raise any specific issue regarding that analysis, 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-10-7** The comment states that habitat mitigation in areas that are not proximate to the project Site cannot be justified. The County acknowledges the comment and notes that it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

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Nonetheless, the County does not concur with this comment. The County allows for off-site mitigation areas that provide similar vegetation communities and habitat types. The proposed off-site mitigation area is located entirely within the Draft North County MSCP Plan's pre-approved mitigation area (PAMA), and conservation of this area would contribute to the overall preserved lands within the PAMA and provide an important block of habitat for that region.

- O-10-8** The comment states that the locations of the school and multi-family units are a threat to human health. The comment states that the California Air Resources Board recommends a minimum distance of 500 feet from a freeway. The comment states that the school and homes should not be included as part of the project.

In response, an operational health risk assessment was prepared as part of the Draft EIR to analyze the health risks associated with operation of Interstate (I) 15, Deer Springs Road, and the ARCO gas station to new residents and schools introduced to the project Site as part of the project (see Appendix C, Health Risk Assessment, of Appendix G, Air Quality Technical Report). As stated in the Air Quality Technical Report (pages 138–139):

Regarding operational health risk, students attending the school on Site would be exposed to a maximum cancer risk of approximately 4.2 in 1 million. Project residents located in the north-east corner of the Town Center residential area would be exposed to a maximum cancer risk of approximately 9.1 in 1 million following implementation of mitigation measures M-HR-1, M-HR-2, M-HR-3, M-HR-4, and M-HR-5. The cancer risks on the project Site would not exceed the SDAPCD threshold of 10 in 1 million for cancer impacts after mitigation. The project residents would be exposed to a maximum chronic hazard index of approximately 0.02. The project residents would be exposed to a maximum acute hazard index of approximately 0.1. Therefore, the resulting maximum chronic and acute hazard indices are less than the SDAPCD threshold of 1.0 for chronic and acute noncancer health impacts. With implementation of mitigation measures, the health impacts to residents and students attending the school on Site would be less than significant.

In sum, the County considered potential health risks to new residents and students attending the school at the project Site, and found that such impacts would be less than significant.

- O-10-9** The comment states that noise associated with blasting activities were not adequately analyzed. Please refer to **Topical Response NOI-1**, which summarizes the discussion of noise impacts from blasting that is incorporated in the Draft EIR in Section 2.10,



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Noise, and Appendix Q, Noise Report. As discussed therein, the Draft EIR discusses the potential impacts of blasting activities and incorporates appropriate mitigation measures to reduce potential noise and vibration impacts from blasting to less than significant.

- O-10-10** The comment states that the conclusion in the Draft EIR Section 2.14, Utilities and Service Systems, that the Water Authority has the water necessary to meet the needs of the San Diego region is “questionable” and “false” because the Vallecitos Water District (VWD) is “the only District in the entire State showed it has NO Water for new development.” The comment references the VWD 2015 Urban Water Management Plan. The comment states, “[t]here are no water mitigations to support this project.”

The Twin Oaks Valley Property Owner’s Association made a similar comment in a newspaper ad, claiming that “36% cuts to resident’s water supply” would be required for VWD to serve the proposed project because of VWD’s alleged lack of water. VWD responded by posting on its website on August 1, 2017 (<http://www.vwd.org/Home/Components/News/News/2358/18>) a “Correction of Misinformation” to this “false” statement [emphasis added]:

Recently, the Twin Oaks Valley Property Owner’s Association published a newspaper ad noting ‘36% cuts to resident’s water supply’ in relation to a proposed Newland Sierra housing project. *This statement is false.* The Vallecitos Water District is not in a drought emergency and therefore is not imposing any mandatory water-use cuts (reductions). In addition, the District would never impose water-use reductions to any customers to allow for any proposed development, including the Newland Sierra project.

To continue to provide reliable water service to our customers, Vallecitos is guided by its Master Plan, which analyzes existing and future land uses, as well as current water demands and trends, to evaluate the existing and future water needs for District customers well into the future. *Even with the 1,624 acre-feet [asterisk omitted] of annual water demand projected for the proposed Newland Sierra development, the District has already anticipated greater water use (1,825 acre-feet per year) identified for this property during the 2017 Master Plan process without the development. In other words, even if this development moves forward, the District will have sufficient water supplies for all new and existing customers.*

During the recent drought, the cutbacks to our customers were not due to a supply shortage, as Vallecitos had sufficient water supplies. The cutbacks were mandated by an Executive Order from Governor Brown. Even during

the depth of the drought, Vallecitos' water provider - the San Diego County Water Authority (SDCWA), projected 85,196 acre-feet of water in storage after assuming an additional three consecutive years of drought. *Since the drought has ended, SDCWA now has 171,000 acre-feet of water in storage, and no restrictions on deliveries to the Vallecitos Water District, or any agency. This is in addition to the drought-resilient water available from the Pacific Ocean from the District's direct connection to the Claude "Bud" Lewis – Carlsbad Desalination Plant.*

The availability of adequate water supply from VWD is made clear in the Draft EIR, Section 2.14, and Appendix S, Water Supply Assessment. Specifically, The Water Supply Assessment (WSA) provides states the following (Draft EIR, Appendix S pages 42–43):

This WSA Report demonstrates that, with development of the resources identified, there will be sufficient water supplies over a 20-year planning horizon to meet the projected demand of the proposed Project and the existing and other planned development projects within the District's service area.

Our Findings include the following:

### **Projected Demands for District and Newland Sierra Study Area**

1. The District's 2014 Draft Master Plan and 2015 UWMP forecast an increase in demand for the District from 13,300 acre feet per year (AFY) in 2015 to 21,219 AFY in 2020 and 28,229 AFY in 2035, under normal year conditions.
2. A projected demand of 1,825 AFY for a No Project Alternative was included in the District's 2014 Draft Master Plan future demand forecast for the Project study area. The No Project Alternative refers to the 2011 General Plan land use for the property, given that the proposed Newland Sierra Specific Plan is not yet adopted.
3. The projected water demand of 1,825 AFY for the No Project Alternative for the study area was accounted for in projecting future supply requirements in the 2015 UWMPs for the District, the Water Authority and Metropolitan.
4. Under rezoning and densification of portions of the Project study area, defined in the Newland Sierra Draft Specific Plan, the proposed Project is estimated to have an annual average demand of 1,624 AFY. This represents an 11% decrease in water demand compared to the 1,825 AFY demand that the District has planned for in its Draft 2014 Master Plan and 2015 UWMP.

5. The Newland Sierra Water Conservation Demand Study (GSI, 2016) estimates that the incorporation of Cal Green Building Code standards and Water Efficient Landscaping will reduce the estimated water demand of 1,624 AFY by at least 26% to 1,196 AFY. This is 35% [36%] less than the No Project Alternative demand (1,825 AFY) that is currently planned for in the local and regional water supply planning documents.

### **Projected Reliable Supply for District and Newland Sierra Study Area**

1. The District's 2015 UWMP demonstrates that if Metropolitan, Water Authority and District supplies are developed as planned, along with achievement of conservation targets, then no shortages are anticipated within the District's service area in a normal, single dry or multiple dry-year through 2035.
2. Conservation is an important component of the District's water supply plan to meet future demands, fulfilling as much as 13,080 AF (approximately 36% of the demand requirements) to meet 2020 demands under multi-dry year conditions, but lessening over time to 11,114 AFY (approximately 26% of the demand requirements) in 2025 through 2035.
3. If the study area were to share equally in the conservation requirement, the previously projected No Project Alternative demand of 1,825 AFY would need to be reduced by 26% to 36%, to between 1,402 and 1,168 AFY.
4. The Newland Sierra Project is projected to have a demand of 1,624 AFY, without conservation measures, and 1,196 AFY with intended water conservation savings. This Project demand, with conservation measures, represents a 35% reduction from the No Project Alternative that is currently planned for and incorporated into the District's planning documents.
5. With the implementation of water conservation measures, Newland Sierra Project will sufficiently contribute toward the District's intent to use water conservation to meet 26% to 36% of its future demand projections under multi-dry year conditions through 2035.

### **Conclusions**

1. The No Project Alternative water demands (1,825 AFY) are accounted for in the District's 2014 Draft Master Plan and 2015 UWMP documents.
2. The Newland Sierra Project estimated water demands (1,624 AFY) are less than the No Project Alternative projected demands that the District has planned for in its 2014 Draft Master Plan and 2015 UWMP.

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3. With water conservation measures, the Newland Sierra Project will reduce the estimated water demand of 1,624 AFY by at least 26%, to 1,196 AFY. This Project demand represents a 35% reduction from the No Project Alternative that is currently planned for (1,825 AFY). As such, the Project's demand projection incorporates water conservation savings that fall within the 26 to 36% range needed to help the District achieve its water conservation target to meet future demands.
4. The planning documents referenced herein indicate that there is sufficient supply over a 20-year planning horizon to meet the projected demand and associated water conservation measures of the proposed Project and the existing and planned development projects within the District's service area.

**O-10-11** The comment includes a header that states, "traffic and I-15 expansion not adequately addressed." The County notes that the comment expresses the opinions of the commenter, and does not specifically state what about the I-15 expansion was not adequately addressed in the Draft EIR. Traffic and the I-15/Deer Springs Road interchange (which is identified in the Draft EIR as mitigation measure M-TR-1) received extensive analysis in the Draft EIR; refer to Section 2.13, Transportation and Traffic, and Appendix R, Traffic Impact Analysis. Also see **Topical Response TR-2**, which addresses the I-15/Deer Springs Road interchange. Where relevant, other sections of the Draft EIR also discuss the effects of traffic improvements and the I-15/Deer Springs Road interchange. Given that the comment is general, no further or more specific response can be provided or is required (*Paulek v. California Dept. Water Resources* (2014) 231 Cal.App.4th 35, 47-52). This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

**O-10-12** The comment states that the project should be delayed until the General Plan is updated. The comment states that the County should postpone decisions employing greenhouse gas thresholds as specified in the adopted General Plan, including release of EIRs that use unapproved thresholds, and should postpone approval of lands that are currently "greenfields" and that would require an amendment to the General Plan, until a legally adequate Climate Action Plan (CAP) and thresholds are approved.

The County acknowledges the comment and notes that it expresses the opinions of the commenter and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

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Nonetheless, the County's CAP (which included thresholds) was approved by the Board of Supervisors on February 14, 2018. As stated in the County's CAP, the County is on track with existing state and local measures to achieve the state-mandated requirements for 2020 that are established in Assembly Bill 32. In fact, the County will achieve this legislative requirement for 2020 without the measures adopted in the CAP. The CAP provides substantial evidence that the County will achieve the legislative target for 2030 that are established in Senate Bill 32.

The County agrees that any inconsistency with the CAP or General Plan that has environmental consequences would be an impact under CEQA Appendix G. However, the Draft EIR's analysis indicates that the project would not conflict with applicable General Plan policies for the reduction of GHG emissions. It is noted that the CAP was not discussed in detail in the project's Draft EIR because the draft version of the CAP was published after release of the Draft EIR. CEQA does not require evaluation of a project's consistency with un-adopted, draft plans.

Nonetheless, although the proposed project is not accounted for in the 2018 CAP's emissions inventories, the CAP does not preclude General Plan amendments. Further, because the project proposes to reduce its greenhouse gas emissions to net zero, the project would not impair the CAP's ability to achieve its anticipated emissions reductions.

Please see **Topical Response GHG-1** and **Responses to Comments O-1-142** and **O-1-143**, which explain that the proposed project would result in net zero greenhouse emissions, and, thus, would not affect implementation of the County's CAP.

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