A-6  SANDAG

A-6-1 The County acknowledges that this comment letter replaces San Diego Association of Governments’ (SANDAG) April 16, 2018, comment letter. Further, the County notes that the April 16, 2018, comment letter is included as Comment O-6-15. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-2 The comment states that statements in the April 16, 2018, comment letter regarding the Otay Ranch Village 14 and Planning Areas 16/19 (Proposed Project), SANDAG’s Series 13 and Preliminary Series 14 SANDAG Regional Growth Forecasts were incorrect. The County acknowledges the comment and appreciates the correction. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-3 The comment states that the statements in the April 16, 2018, letter are “retracted and replaced by the comments below.” The County acknowledges the comment and appreciates the correction. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required.

A-6-4 The comment states “[i]mplementing the project will not conflict with the implementation of San Diego Forward: The Regional Plan (Regional Plan) or attainment of its greenhouse gas reduction targets.” The comment is consistent with the conclusions reached in the Draft EIR, Section 2.7, Greenhouse Gas Emissions. No further response is required or provided.

A-6-5 The comment requests the County continue to take into consideration consistency with guiding plans for the region and further states that, in 2011, SANDAG supported the vision and goals of the County’s General Plan Update, which shifted 20% of the future growth from eastern backcountry areas to western communities. The Draft EIR, Section 3.1.3, Land Use and Planning, and Appendix 3.1.3-1, General Plan Amendment Report provide an analysis and determined the Proposed Project would be consistent with the County’s General Plan. The Draft EIR also discusses that the Proposed Project is part of the Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP), which was jointly adopted by the County of San Diego and City of Chula Vista in 1993 for the establishment of an integrated but diverse master-planned community.\(^2\) The Otay Ranch GDP/SRP has been implemented over the previous 25 years, and the Proposed Project is consistent

\(^2\) For more information on Otay Ranch, please see https://www.sandiegocounty.gov/pds/mscp/or.html.
with the development pattern envisioned and approved by the County and City of Chula Vista. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-6 The comment states that SANDAG supports the goals and objectives that are currently laid out in the 2011 County’s General Plan, as it encourages smart, sustainable growth and reinforces the principles set forth in the Regional Plan. The County acknowledges the comment and notes that the Proposed Project is consistent with the County General Plan, as analyzed in the Draft EIR, Appendix 3.1.3-1, General Plan Amendment Report and Section 3.1.3, Land Use and Planning. Further, as also described in Section 3.1.3, Land Use and Planning, of the Draft EIR, the Proposed Project is consistent with the approved Otay Ranch GDP/SRP, which establishes a series of urban and rural villages and estate planning areas, connected by transit and transportation systems. The Otay Ranch GDP/SRP was designed to provide the most density in the more western Otay Valley Parcel while providing a wide range of housing options within the overall 23,000-acre community, which includes over 11,000 acres of Otay Ranch RMP Preserve/Open Space. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-7 The comment states that other County planning documents, such as the Climate Action Plan (CAP), reinforce the vision and goals of the County General Plan. The County agrees that the CAP, adopted in February 2018, reinforces the vision of the County General Plan. The County also notes that the Proposed Project, while it does not rely on or tier from the CAP, would not conflict with implementation of the CAP. (See Thematic Response – CAP Consistency.) As discussed therein, the Proposed Project would not conflict with the County’s CAP because it would implement applicable emissions reduction measures identified in the County’s CAP Consistency Review Checklist and because it would result in net zero greenhouse gas emissions following implementation of the mitigation framework recommended in the EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-8 The comment states that SANDAG realizes that general plans are meant to be dynamic and updated to reflect market forces, population growth, and trends. The comment further states that SANDAG supports land use principles that preserve natural resources and limit urban sprawl. The County acknowledges the comment and notes that it expresses the opinions of the commenter regarding the preservation of natural resources and limitations on urban sprawl. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
A-6-9 The comment states that the SANDAG Smart Growth Toolbox and Smart Growth Design Guidelines provide planning, visualizing and financing tools showing how smart growth principles can be put into practice and used when the goals outlined in the County General Plan are implemented. The County acknowledges the comment provides background information on the SANDAG Smart Growth Toolbox and Smart Growth Design Guidelines. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-10 The comment requests that the County consider whether the Proposed Project is consistent with the land use and transportation goals of San Diego County General Plan, CAP, and the Regional Plan. The County acknowledges the comment and refers the commenter to Responses to Comments A-6-5, A-6-6, and A-6-7 regarding the Proposed Project’s consistency with the County’s General Plan and CAP. As discussed therein, the Proposed Project would be consistent with both the General Plan and CAP. As to SANDAG’s Regional Plan, please refer to Response to Comment O-6-4. No further response is required or provided.

A-6-11 The comment requests the proposed bike path provide separate spaces for people biking and walking to encourage higher levels of use. The Otay Ranch Village 14 and Planning Areas 16/19 Specific Plan provides design features, surface materials, and placement throughout the Proposed Project to promote hiking and walking, and the roadway cross sections indicate that pedestrians and bicyclists would have access to separated travel pathways (refer to Specific Plan Exhibits 22, 40, and 77). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-12 The comment states that SANDAG has other resources that can be used for additional information or clarification on smart growth and active transportation, and provides a list of these resources on its website. The County acknowledges the comment. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

A-6-13 The County notes the comment provides concluding remarks requesting that SANDAG is included on all environmental documents related to the Proposed Project and provides concluding remarks and contact information. The comment does not raise an issue regarding the adequacy of the Draft EIR. For that reason, the County provides no further response to this comment, but notes that SANDAG is on the Proposed Project’s noticing list.