

I-15 BILL FAIR

I-15-1 The comment expresses concerns that traffic cannot be handled on roadways in the vicinity of the Proposed Project. The commenter does not provide evidence to support that the increased traffic as a result of the Proposed Project cannot be handled on any roads or streets.

The County refers the commenter to Section 2.9, Transportation and Traffic, of the Draft EIR for a description and analysis of the Proposed Project's impacts to roadway segments and intersections. Table 2.9-49 of the Draft EIR provides a summary of significant impacts and mitigation measures. Mitigation measures are provided in Section 2.9.6 of the Draft EIR.

In regard to mitigation measures that identify improvements located within the jurisdiction and control of the California Department of Transportation (Caltrans) or the City of Chula Vista, the County cannot ensure that Caltrans or the City of Chula Vista will permit the improvements to be made. Therefore, the impacts for roadway segments and intersections not under the control of the County are considered significant and unavoidable for purposes of this analysis, as disclosed in the Draft EIR. The County also refers the commenter to **Thematic Response – SR-94 Improvements**.

If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations that reflects a balance of competing public objectives (i.e., environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations has been prepared for consideration by the decision-makers with the Final EIR.

I-15-2 This comment generally refers to infrastructure and needed improvements to highways and streets before this Proposed Project is started. The County refers the commenter to Section 2.9, Transportation and Traffic of the Draft EIR, which analyzes the Proposed Project's impacts to streets and highways. Section 2.9.1, Existing Conditions, provides an assessment of existing traffic facilities within the Proposed Project study area, and Tables 2.9-1 and 2.9-2 show existing average daily traffic (ADT) volumes for the Proposed Project study area roadway segments and the AM/PM peak hour traffic volumes for the study area intersections, respectively. Section 2.9.6 of the Draft EIR identifies mitigation measures for the Proposed Project's significant impacts to traffic. This comment does not raise a specific issue regarding the adequacy of the Draft EIR, therefore, no further response is required or provided.

- I-15-3** This comment raises concern regarding Proposed Project traffic flows to the southwest. The County refers the commenter to Section 2.9, Transportation and Traffic, of the Draft EIR for analyzes of the Proposed Project’s traffic impacts to local and regional roadways, including highway segments. Mitigation measures for transportation and traffic impacts are identified in Section 2.9.6 of the Draft EIR. The comment does not raise a specific issue regarding adequacy of the analysis in the Draft EIR, therefore, no further response is required or provided. Nonetheless, the County refers the commenter to Section 4.4 and Appendix D of Appendix 2.9-1, Transportation Impact Study (TIS), which describes the existing roadway network and roadway segments. As described in Section 4.4 of the TIS, the Proposed Project trip distribution and assignment were developed based on the SANDAG Series 11 Regional Transportation Model Select Zone analysis and adjusted to reflect existing traffic patterns. Trip distribution and assignment for the Proposed Project are shown in Figure 5-1 and Figure 5-2 for Existing Plus Project conditions, Figure 6-2 and Figure 6-2 for Year 2025 Cumulative Conditions, and Figure 7-1 and Figure 7-2 for Year 2030 Cumulative Conditions. The traffic analysis contained in Section 2.9 of the Draft EIR was based up these distributions derived from the regional traffic model.
- I-15-4** The comment generally addresses traffic hazards and safety issues. The County refers the commenter to **Response to Comment O-2-15** through **O-2-18**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I-15-5** The comment expresses the opinions on land use and the allowed extension of sewer service. The County refers the commenter to Section 3.1.8.2.2, Wastewater Treatment, of the Draft EIR. In addition, construction and operational impacts associated with proposed sewer facilities as a result of the Proposed Project are adequately analyzed in the Draft EIR. To further clarify the use and extension of sewer facilities within the Proposed Project, “only” properties within the Otay Ranch boundaries are allowed to pursue sewer facilities vs. septic. Any property outside of Otay Ranch area is “prohibited” from accessing these sewer facilities. The County refers the commenter to **Thematic Response – Sewer/Septic**. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I-15-6** This comment raises concerns regarding egress from Planning Areas 16/19. The County refers the commenter to Section 2.9, Transportation and Traffic, of the Draft EIR for an analyses of the Proposed Project’s traffic impacts, including traffic generated from Planning Areas 16/19. Traffic impacts associated with Planning Areas 16/19 accessing the Jamul area were determined not to be significant in the Draft

EIR. Please refer to pages 2.9-21 and 2.9-22 regarding traffic generated from Planning Areas 16/19. This commenter does not raise an issue regarding adequacy of the Draft EIR; therefore, no further response is required or provided.

I-15-7 This comment expresses concerns regarding the Proposed Project's traffic impacts to State Route (SR) 94. The County refers the commenter to Section 2.9, Transportation and Traffic, of the Draft EIR for the analysis of the Proposed Project's traffic impacts, including impacts to SR-94. Specifically, the only potentially significant impacts to SR-94 would occur at the intersection of SR-94 and Lyons Valley Road. (Impacts TR-9, TR-11, TR-13, and TR-15 would occur under the Existing Plus Project, 2025 Cumulative, 2030 Cumulative, and 2030 with Hypothetical Development of State Preserve Property scenarios, respectively.) The traffic impact to the intersection of SR-94 and Lyons Valley Road would be mitigated by implementing Mitigation Measure M-TR-2, which includes coordinating with Caltrans to signalize the intersection of SR-94 and Lyons Valley Road, as described on page 2.9-74 in Section 2.9, Transportation and Traffic, of the Draft EIR.

However, because the improvements are under the jurisdiction and control of Caltrans and therefore, the County does not have the authority to permit or implement the improvements, the implementation of improvements cannot be assured. Therefore, for purposes of the Draft EIR, Impacts TR-9, TR-11, TR-13 and TR-15 are considered significant and unavoidable. No other significant impacts to SR-94 are identified as a result of the Proposed Project.

Also refer to **Response to Comment I-1-2**.

I-15-8 The comment expresses concern regarding traffic on Whispering Meadows Lane and Valley Knolls Road. The County refers the commenter to Section 2.9, Transportation and Traffic, of the Draft EIR for the analysis of the Proposed Project's traffic impacts, including impacts on Whispering Meadows Lane. Specifically, pages 2.9-21 and 2.9-22 of the Draft EIR address Whispering Meadows Lane. It is anticipated that this connection would be utilized primarily by the 112 estate homes in Planning Area 16 and only those accessing the Jamul area (6% of total traffic generated from Planning Areas 16/19). The 112 estate homes would generate a total of 120 AM peak hour trips, thus a total of 7 trips in the AM peak hour (120 total peak hour trips x 6%) and 9 trips in the PM peak hour (150 total peak hour trips x 6%) would use the Whispering Meadows connection on a typical day (see Table 4.1 of Appendix 2.9-1 of the Draft EIR for detailed Proposed Project trip generation calculations).

The County's traffic study guidelines require analysis of all local roadway segments, including all state surface routes, intersections, and mainline freeway locations, where the Proposed Project would add 20 or more peak-hour trips in either direction to the existing roadway traffic. The 20 peak-hour trips threshold is used because it is reasonable to conclude that projects that would generate less than 20 peak-hour trips at a particular location would not result in significant impacts at that location. Based on the calculations provided above and the minimal number of peak-hour trips that potentially would use the subject access point, traffic added to Whispering Meadows Lane by the Proposed Project would be less than the 20-trip minimum. Therefore, no further analysis is required, since the Proposed Project would not result in significant impacts along Whispering Meadows Lane/Valley Knolls Road.

- I-15-9** The comment expresses an opinion that a traffic safety device should be put at the entrance to Proctor Valley Road from the Valley Knolls Road and Whispering Meadows Lane subdivision. The County refers the commenter to Section 2.9, Transportation and Traffic for the analysis of the Proposed Project's traffic impacts. The Proposed Project would not result in significant traffic impacts to Whispering Meadows Lane/Valley Knolls Road, as discussed on pages 2.9-21 and 2.9-22 of the Draft EIR. Please refer to **Response to Comment I-15-8**. The Proposed Project would not result in a significant impact at the entrance to Proctor Valley Road from Valley Knolls Road.
- I-15-10** This comment expresses concerns regarding safety and hazards on Proctor Valley Road and State Route 94. Section 2.9, Transportation and Traffic, analyzes the Proposed Project's impacts to Proctor Valley Road and SR-94. Please refer to **Response to Comment I-15-7** regarding SR-94 and **Thematic Response – SR-94 Improvements**.
- I-15-11** The comment expresses opinions regarding Proctor Valley as a "treasure" and concerns regarding development within state-owned Preserve areas. The Proposed Project would not develop state-owned lands beyond those impacts anticipated in the MSCP County Subarea Plan and for planned facilities as further described in **Response to Comment A-3-64** and to **Thematic Response – Off-Site Roads**. The County refers the commenter to Section 2.4, Biological Resources, of the Draft EIR for analyzes of the Proposed Project's impacts to biological resources.

The County notes that The Land Exchange Alternative would include a land exchange with the State (Planning Areas 16/19 for Proctor Valley lands). The Land Exchange Alternative is analyzed in Section 4.8 of the Draft EIR and Appendices 4.1-1A through 4.1-15 to the Draft EIR. The comment does not raise any specific issue

- regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required or provided.
- I-15-12** The comment expresses concerns water supply issues. The County refers the comment to **Response to Comment I-16-4**. The Proposed Project's impacts to water supply were analyzed in Section 3.1.8.2.1, Water Supply, of the Draft EIR. As discussed therein, in the event that drought conditions become so severe that the Otay Water District (OWD) declares a Drought Level 3 emergency, the Water Conservation Plan recommends that the Proposed Project offset its projected water use by contributing to the cost of or actually constructing off-site improvements. These off-site improvements would be designed to reduce existing potable water use, and typically consist of retrofitting older buildings with newer fixtures that are more water efficient. Further, as discussed in Section 3.1.8.3, Cumulative Impact Analysis, future growth within the OWD boundaries could result in a cumulative increase in demand on water supply. However, the Proposed Project, along with any other cumulative projects within OWD's jurisdictional boundaries, would be required to provide availability and commitment letters demonstrating sufficient water resources and access to available water facilities prior to building permit issuance. Appendix 6 – Water Conservation Plan, also addresses the use and reduction of water resources for both public and private facilities being contemplated by the applicant. Regarding water rationing, the Proposed Project would have a less-than-significant impact on water supply and, therefore, no water rationing would result from the Proposed Project.
- I-15-13** The comment expresses general opposition to the Proposed Project. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

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