

I-2 JEAN STOUF 1

I-2-1 This comment refers to the attached Comment Sheet (**Comments I-2-4 through I-2-9**). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

I-2-2 The County acknowledges the commenter's opposition to the Land Exchange Alternative. The County does not agree that the Land Exchange alternative is not acceptable because area roads will not handle traffic from the Proposed Project or the 1,530 dwelling units analyzed under the Land Exchange Alternative (Section 4.8 of the Draft EIR). The commenter does not provide evidence to support this claim.

Transportation and traffic impacts from the Land Exchange Alternative were analyzed on pages 4-74 and 4-75, of Section 4.8.2, Comparison of the Effects of the Land Exchange Alternative to the Proposed Project, of the Draft EIR. The following is provided therein:

[T]he Land Exchange Alternative would increase ADT by approximately 3,000 ADT due to the increase in residential units from 1,119 to 1,530. However, because the Land Exchange Alternative would amend the Otay Ranch GDP/SRP and the County General Plan (through the Otay Subregional Plan) to reduce the total number of units in the Land Exchange Area from 2,132 to 1,530, the Land Exchange Alternative would reduce cumulative traffic from the Land Exchange Area by approximately 5,830 ADT compared to planned conditions ... Overall, compared to the Proposed Project, the Land Exchange Alternative would result in reduced impacts to traffic and transportation.

The analysis contained in Section 4.8.2 of the Draft EIR is supported by Appendix 4.1-9, Land Exchange Alternative Traffic Impact Analysis. Appendix 4.1-9 fully analyzes the potential traffic impacts of the Land Exchange Alternative at the project level.

I-2-3 The County acknowledges the comment and notes that it expresses the opinions of the commenter regarding widening State Route (SR) 94 from the Jamacha junction to Otay Lakes Road. The comment does not raise an issue related to the adequacy of the Draft EIR. Section 2.9, Transportation and Traffic of the Draft EIR does not indicate that the Proposed Project would require the widening of SR-94; rather, the only significant project impact to SR-94 is at the intersection of SR-94 and Lyons Valley Road. For additional information regarding the Proposed Project's impact to SR-94

and Lyons Valley Road, please refer to **Response to Comment I-1-2** and **Thematic Response – SR-94 Improvements**.

I-2-4 The County acknowledges the comment as an introduction to comments that follow. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

I-2-5 The commenter recommends deleting Planning Area 16 unless a couple larger lots “perk for septic.” 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 the Draft EIR; therefore, no further response is required or provided.

However, it should be noted that the Draft EIR included the analysis of a reasonable range of alternatives to the Proposed Project. The Land Exchange Alternative analyzed in the Draft EIR includes the removal of development in Planning Areas 16/19. Please refer to Chapter 4, Project Alternatives, specifically Section 4.8, Land Exchange Alternative, and Figure 4-6, Land Exchange Alternative, for further details. All alternatives will be considered by the decision makers.

Regarding the sewer/septic comment, the Proposed Project’s on-site and off-site sewer facilities were fully analyzed on pages 3.1.8-38 through 3.1.8-42 in Section 3.1.8, Utilities and Service Systems, of the Draft EIR. The County refers the commenter to **Thematic Response – Sewer/Septic**. Further, Appendix 3.1.8-3, On-Site Wastewater Treatment Feasibility Study, was prepared to address the feasibility of septic on site. As summarized in the Draft EIR on page 3.1.8-9:

The Project Area does not possess suitable soil or ground water conditions to support conventional or alternative on-site wastewater treatment systems on each proposed lot (Appendix 3.1.8-3). Because the Septic Study concluded that the lots in the eastern portion of Planning Area 16 would need to be served by sewer, it became unnecessary to evaluate the remainder of the Planning Area 16 lots since the sewer line to the eastern lots would necessarily be installed adjacent to nearly all of the remaining lots in Planning Area 16. County policy requires that any lot adjacent to a sewer line in a public right of way be provided access to that sewer line (County of San Diego Ordinance No. 10136; San Diego County Code of Regulatory Ordinances, Section 1: Title 6, Division 8, Chapter 3, Article 2, Section 68.310). For these reasons, the on-site septic option is not discussed further in this section.

The comment does not raise a specific issue regarding the adequacy of the Draft EIR; therefore, no further response related to sewer or septic is required or provided.

I-2-6 The County acknowledges the comment and notes that it expresses the opinions of the commenter regarding septic-only in Planning Area 19. The County also refers the commenter to **Response to Comment I-2-5**. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

I-2-7 The County acknowledges the comment and notes that it expresses the opinions of the commenter regarding school district boundaries. The Proposed Project's impacts related to schools were fully analyzed on pages 3.1.6-24 through 3.1.6-30 in Section 3.1.6, Public Services, of the Draft EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

I-2-8 The County acknowledges the comment and notes that it expresses the opinions of the commenter regarding the Land Exchange Alternative. The comment does not raise an issue related to the adequacy of the Draft EIR; therefore, no further response is required or provided.

I-2-9 The County acknowledges the comment and notes that it expresses a request for more information regarding the Alternate Site Location Alternative. The Alternate Site Location Alternative was fully analyzed in Section 4.6, pages 4-36 through 4-50, of the Draft EIR. As described in Section 4.6.4, "the Alternate Site Location Alternative is not feasible, largely because the applicant neither owns nor controls the land in question, and has no reasonable means of acquiring it."

Moreover, this alternative would not comply with a majority of the Project Objectives because it would require a County General Plan Amendment, an Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP) Amendment, an Otay Ranch Resource Management Plan (RMP) amendment, a Multiple Species Conservation Program (MSCP) County of San Diego Subarea Plan boundary adjustment, and a City of San Diego MSCP boundary adjustment for impacts to Cornerstone Lands (Objective 2). Further, it would "not provide for efficient use of the Project Area or provide a level of private development adequate to ensure the economically feasible provision of public facilities and services required to serve the community's needs" (Objective 8). This alternative would also not assist in meeting the regional housing needs identified in the County's General Plan Housing Element because it would only provide 468 units compared to the 1,119 proposed by

the Proposed Project. It would not achieve Objective 4 because it would not include a Village Core with sufficient intensity at the heart of Village 14 that provides a sense of place for residents and establishes the activity and social center of the Village, including an elementary school site. Correspondingly, without a Village Core, this alternative would not “combine appropriate land uses with current local and state conservation technologies and strategies to meet local, state, and federal goals for reducing greenhouse gas emissions” (Objective 7). The Draft EIR includes sufficient information to adequately analyze this alternative as required under CEQA Guidelines Section 15126.6.