

I-23 PRESTON BROWN

I-23-1 The comment expresses the opinion that the Draft EIR is incomplete and that it does not show how the housing layout and configuration meets the goals of the Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP). The County does not agree.

The Proposed Project's consistency with the Otay Ranch GDP/SRP was analyzed in Section 3.1.3.2.2 of the Draft EIR. The Draft EIR determined that the Proposed Project would be consistent with the Otay Ranch GDP/SRP. As discussed on page 3.1.3-24 of the Draft EIR, and detailed in Appendix 3.1.3-1, General Plan Amendment Report, of the Draft EIR, the Proposed Project would include minor amendments to the Otay Ranch GDP/SRP to align the County's version of the Otay Ranch GDP/SRP with the City of Chula Vista's version of the Otay Ranch GDP/SRP. These minor amendments would include refinements to more accurately describe the Proposed Project and would not result in any inconsistencies with policies or goals of the Otay Ranch GDP/SRP. The Proposed Project also would amend the Otay Ranch GDP/SRP to be consistent with the County General Plan Mobility Element, which designates Proctor Valley Road as a two-lane light collector, compared to a four-lane road in the Otay Ranch GDP/SRP. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

I-23-2 The comment states that the Baldwin Letter "eliminates the development entitlements" for PV1, PV2, and PV3 and that the Agreement was not mentioned in the Draft EIR. The County understands that this comment refers to the Baldwin Letter; however, the County does not agree that the letter constitutes an agreement. The County further does not agree that PV1, PV2, and PV3 have been set aside as preserved lands under an agreement or any other document. Please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. See also **Responses to Comments A-3-5 through A-3-58**.

I-23-3 The comment asserts that no graphics and mapping identifying PV1 through PV3 as Preserve, or other Preserve lands, are included in the Draft EIR. Please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. The County also refers the commenter to Figure 2.4-18, County of San Diego Multiple Species Conservation Program (MSCP) South County Sub-Area, and Figure 2.4-17, Regional Planning Context, of the Draft EIR.

I-23-4 The comment states specific mapping should be included showing the location of vernal pools, wildlife corridors, MSCP preserved lands, and endangered habitat

- relative to the proposed development. Section 2.4, Biological Resources, of the Draft EIR, and the Biological Resources Technical Report, Appendix 2.4-1 to the Draft EIR, include mapping of biological resources and the proposed development. Please refer to Figures 2.4-19a through 2.4-19cc, which show the locations of biological resources relative to the proposed development, as well as Figure 2.14-16, Wildlife Corridors and Habitat Linkages.
- I-23-5** The comment expresses opinions regarding the ecological importance of the Proctor Valley parcels. The comment also refers to the intent of the Preserve lands in Village 14. The Draft EIR, Section 2.4, Biological Resources, addresses the Proposed Project's impacts to biological resources, and determined that, with implementation of Mitigation Measure M-BI-1 through Mitigation Measure M-BI-21, the Proposed Project's impacts to biological resources would be reduced to less than significant. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I-23-6** This comment expresses the commenter's opinion regarding the proposal's conflict with the MSCP County Subarea Plan. The County does not agree that the Proposed Project conflicts with the MSCP County Subarea Plan. Please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**.
- I-23-7** The comment recommends including an overlay showing the MSCP lands. Refer to Figure 2.4-16 of the Draft EIR, which depicts the Project Area, Project Applicant-owned Otay Ranch Resource Management Plan (RMP)/MSCP Preserve lands, and public lands identified by ownership (California Department of Fish and Wildlife, Bureau of Land Management, U.S. Fish and Wildlife Service, and Department of Defense). The County further refers the commenter to Section 2.4.4, Cumulative Impacts, of the Draft EIR, which determined that the Proposed Project would have a less than cumulatively considerable impact to biological resources. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I-23-8** The comment provides background information regarding the Otay Ranch Phase 2 RMP and the Otay Ranch GDP/SRP. Regarding the comment about transition areas, the comment restates information contained in the Draft EIR. As discussed in Section 3.1.3.2.2 of the Draft EIR, the Otay Ranch GDP/SRP identified Village 14 as “a transition from the more urban uses of the west to the more rural areas of Jamul. Because it is relatively isolated, the village functions as a self-contained service area.” The Proposed Project also includes Preserve Edge Plan as part of the Specific Plan, which established a 100-foot buffer area adjacent to the Otay Ranch RMP Preserve,

- in compliance with the Otay Ranch GDP/SRP. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I-23-9** The comment states that the Draft EIR fails to explain how the landscaping and housing fit together. CEQA does not require detailed site landscape plans, which is why the Draft EIR does not include them. Nevertheless, Figures 1-8a and 1-8b of the Draft EIR illustrate how internal slopes, parks, basins, and open space areas are integrated into the development areas. In addition, Section 2.1, Aesthetics, of the Draft EIR analyzes the Proposed Project's impacts and provides photo simulations of the proposed landscaping concepts and housing. Further, Figure 2.1-3 through Figure 2.1-14 of the Draft EIR show proposed conditions with implementation of the Proposed Project at 12 viewpoint locations.
- I-23-10** The comment expresses the commenter's opinions regarding design strategies. The Proposed Project's impacts on aesthetics were analyzed throughout Section 2.1, Aesthetics, of the Draft EIR. A discussion of the Proposed Project's design was also included in Section 2.1.2 of the Draft EIR. Please also refer to Figures 2.1-3 through 2.1-14 of the Draft EIR. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- I-23-11** The comment expresses concern regarding the viewpoints analyzed in the Draft EIR. As discussed in Section 2.1.2 of the Draft EIR, the visual assessment in the Draft EIR identifies "Key Views," which are locations within the Project Area where viewers would likely notice changes in the visual environment associated with the Proposed Project. Although there are many locations where the Proposed Project may be seen, Key Views are those that represent the greatest number of viewers, the viewers who are most sensitive to change, views from public viewing locations with important viewing scenes, and views from a location where the Proposed Project may block an important viewing scene. The Draft EIR provides an adequate analysis of impacts to aesthetics and visual resources.
- I-23-12** The comment provides recommendations for view corridors to be included in the Draft EIR. Figures 2.1-3 through Figure 2.1-14 of the Draft EIR show proposed conditions with implementation of the Proposed Project at 12 different viewpoint locations. As discussed in Section 2.1.2 of the Draft EIR, these locations were chosen because they represent the greatest number of viewers, the viewers who are most sensitive to change, views from public viewing locations with important viewing scenes, and views from a location where the Proposed Project may block an important viewing scene. The Draft EIR provides an adequate analysis of impacts to aesthetics

and resources; therefore, further study of the view corridors recommended in the comment is not necessary.

- I-23-13** The comment expresses concern about the alternatives analyzed in the Draft EIR. Please refer to **Thematic Response – Alternatives**. Further, as discussed in Section 4.2.2 of the Draft EIR, CEQA Guidelines, Section 15126.6(f)(1), identifies the factors to be taken into account to determine the feasibility of alternatives. The factors are site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site. None of these factors establish a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained, and if implementation of such an alternative is remote or speculative. The alternatives analysis in the Draft EIR is adequate under CEQA.
- I-23-14** The comment states that Figures 4-7a through 4-7g in Chapter 4, Alternatives, are difficult to understand. These figures depict alternatives that were previously considered in the Otay Ranch Program EIR (City of Chula Vista and County of San Diego 1993); thus, the figures were not prepared as alternatives to comply with CEQA requirements for this Draft EIR but are included for background information regarding other alternatives that were previously analyzed for the Project Area.
- I-23-15** Regarding the commenter’s concern that the Draft EIR is “cherry picking” information from the MSCP Plan, the County acknowledges the comment and notes that it expresses the opinions of the commenter. The Proposed Project’s consistency with the MSCP County Subarea Plan is analyzed in Section 2.4.3.5 of the Draft EIR. Regarding the Baldwin Letter, please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**.
- I-23-16** This comment provides concluding remarks that express the opinions of the commenter. The County does not agree. This comment does not raise an issue regarding the adequacy of the analysis in the Draft EIR; therefore, no further response is required or provided.