

O-2 JAMUL-DULZURA COMMUNITY PLANNING GROUP

- O-2-1** The comment provides introductory statements regarding the Jamul Dulzura Community Planning Group (JDCPG) and its review of the Draft EIR and process. The comment states the JDCPG voted to withhold their final recommendation on a chosen alternative pending completion of the Final EIR. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.
- O-2-2** The comment states JDCPG and the sub-committee reviewed the Draft EIR and identified seven areas of concern. The comment provides an introduction to comments that follow. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, further response is required or provided.
- O-2-3** The comment states it appears the Draft EIR relied upon outdated growth projections and did not analyze the growth inducing effects of the Proposed Project on the Jamul Dulzura planning area.

The County disagrees with this comment and notes that the comment does not provide any evidence to support the claim that the growth inducing projections used in the Draft EIR are outdated. Population projections in the Draft EIR are based on recent census statistics of population/household from the Department of Finance (2014). However, the County could interpret the comment to mean that the Draft EIR relies upon the 1993 Otay Ranch General Development Plan/Otay Subregional Plan, Volume II (Otay Ranch GDP/SRP) and Otay Ranch Final Program EIR (Otay Ranch PEIR). Note that the Draft EIR “tiers” from the Otay Ranch PEIR, as authorized under CEQA. The Draft EIR explains this fact in the context of growth-inducing effects (Draft EIR, Section 1.8, Growth Inducing Impacts, pages 1-40 through 1-41):

The growth-inducing impacts of the overall development of Otay Ranch, which includes the Project Area, were analyzed in the previously certified Otay Ranch PEIR (City of Chula Vista and County of San Diego 1993c). As noted previously, this EIR tiers from the previously certified Otay Ranch PEIR prepared for the Otay Ranch GDP/SRP. The certified Otay Ranch PEIR concluded that development of Otay Ranch would result in direct and indirect (cumulative) impacts related to growth inducement because it would increase the population, housing, and employment opportunities within the Otay Ranch GDP/SRP area in excess of the growth already occurring or projected for the area. Additionally, infrastructure would be provided in areas that did not previously have such infrastructure.

The Draft EIR goes on to explain that the Proposed Project would not remove obstacles to growth, as most of these obstacles were eliminated through the Otay Ranch GDP/SRP, Otay Ranch Facilities Implementation Plan, and the Otay Ranch PEIR. Moreover, the Proposed Project would not add population or growth-inducing infrastructure beyond that already anticipated in the Otay Ranch PEIR. Section 1.8.5, Growth Inducing Impacts - Conclusion of the Draft EIR states,

[T]he Proposed Project (1) would not propose more homes in Village 14 or Planning Areas 16/19 than approved in the Otay Ranch GDP/SRP as analyzed in the Otay Ranch PEIR, (2) would not develop the golf course suggested for the site, (3) would reduce the size of Proctor Valley Road from four lanes to two lanes, (4) would eliminate Proctor Valley Road easterly toward SR-94 [State Route (SR) 94] through Planning Area 16, and (5) is adjacent to MSCP Preserve lands to the west, north and east, and Lower Otay Reservoir to the south that physically constrain any additional growth. For these reasons, the Proposed Project, while accommodating growth already planned, would not significantly induce growth.

For additional discussion of the Proposed Project's growth inducing impacts, please refer to **Thematic Response –Inducements to Growth** and **Thematic Response – Septic/Sewer**.

O-2-4 The comment states due to the size of the Proposed Project and the extension of water, sewer, natural gas, and electricity into undeveloped areas, the Proposed Project would induce growth in the community.

The Draft EIR, Section 3.1.6 Public Services, and Section 3.1.8 Utilities and Services Systems, provide detailed descriptions of the proposed services and impacts. Although the Proposed Project includes plans to extend public services and utilities to the Project Area, various utility service providers e.g. SDG&E, Otay Water District; Chula Vista Salt Creek Interceptor (sewer), etc. have anticipated serving the Proposed Project at intensities greater than or commensurate with the Proposed Project. Further, these utilities would only be sized to accommodate the Proposed Project. Growth in this area was anticipated and analyzed in the Otay Ranch GDP/SRP and Facilities Implementation Plan and the 1994 Salt Creek Interceptor Study. For additional discussion of the Proposed Project's expansion of public facilities and its effect on growth inducement, please refer to **Thematic Response – Inducements to Growth** and **Thematic Response – Sewer / Septic**.

O-2-5 The comment restates facts about the Proposed Project and the location of the Project Area and its proximity to the Jamul Village Core and Jamul Community Planning Area. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-2-6 The comment questions how urban infrastructure can be extended into undeveloped areas without inducing growth. Please refer to **Response to Comments O-2-3, O-2-4** and **Thematic Response –Inducements to Growth**.

O-2-7 The comment asks what mechanism/assurances exist to prevent sewer services from being extended into Jamul village core which would result in significant adverse “community character” effects. The Draft EIR Section 3.1.5.3, Cumulative Impacts Analysis states (page 3.1.5-12):

[S]ewer service that would be extended to the Proposed Project has been anticipated and assumed into the regional system since the Otay Ranch GDP/SRP was originally approved in 1993. In July 2016, the City of Chula Vista and the County of San Diego entered into a sewer transportation agreement that only allows units approved in Otay Ranch to use the sewer that would be extended to the Proposed Project.

Accordingly, the sewer service to the Proposed Project would be sized only to accommodate development approved in the Otay Ranch GDP/SRP. Since the Jamul village core is not within the boundaries of Otay Ranch, the County has no mechanism to extend sewer services, nor has the overall system been designed to handle any additional sewerage flow from the Jamul village core. Please also refer to the **Thematic Response – Sewer / Septic**.

Regarding the Proposed Project’s impacts on community character, please refer to **Thematic Response – Community Character and Plan Consistency**.

O-2-8 The comment requests an analysis of traffic control measures to offset the growth induced by the Proposed Project within the rural residential areas of Jamul between the northern limits of the proposed development and SR-94 and the Jamul village core.

The County does not agree with the commenter’s request for new analysis of traffic control measures. The Draft EIR analyzed traffic impacts in Section 2.9 Transportation and Traffic, including potential impacts between the northern limits of the proposed development and SR 94 and the Jamul village core. The Draft EIR concluded that there are no significant impacts in that area other than the intersection of SR 94 and Lyons Valley Road. Mitigation measure M-TR-1 would reduce the physical impact at SR-94

and Lyons Valley Road to less than significant; however, the impact is considered significant and unavoidable because the improvement is within Caltrans jurisdiction and the County cannot ensure it would be implemented. The County refers the commenter to **Response to Comment I-1-2** and **Thematic Response – SR-94 Improvements**.

In addition, Section 3.1.5.2.1, Inducement of Substantial Population Growth, analyzes and determines that the Proposed Project would result in similar or less development (Section 3.1.5.2.1, page 3.1.5-9) than anticipated in the Otay Ranch GDP/SRP and Otay Ranch PEIR and County's 2011 General Plan Update. The Draft EIR determines the Proposed Project would not contribute to any new cumulative impacts or growth inducement beyond what was previously analyzed in the Otay Ranch PEIR. Specific to the comment's traffic concerns in this regard, the Draft EIR notes that the Proposed Project would reduce the classification of Proctor Valley Road in the Otay Ranch GDP/SRP from four lanes to two lanes, to be consistent with the County Mobility Element, and would eliminate Proctor Valley Road easterly toward SR-94 through Planning Area 16. For these reasons, the Proposed Project, while accommodating growth already planned for, would not significantly induce growth.

Please also refer to **Thematic Response – Inducements to Growth**.

O-2-9 The comment states that a clear path must be established for motorists, pedestrians, equestrians, bicycles, and off-road vehicles to follow so pass-through traffic headed north from the Project Area does not wander through rural residential areas and increase traffic hazards.

The comment does not raise any issue as to the adequacy of the Draft EIR. Nevertheless, the County notes that the Draft EIR, in Section 2.9, Transportation and Traffic analyzed traffic hazards specifically in Section 2.9.3.6, Hazards Due to an Existing Transportation Design Feature, and Section 2.9.3.7, Hazards to Pedestrians or Bicyclists. As analyzed,

[C]irculation improvements would be reviewed and approved by County transportation engineers (and Caltrans transportation engineers, as applicable, to improvements affecting SR-94) to ensure that the design conforms with the County Code of Regulatory Ordinances and applicable roadway/highway design manuals as they apply to the safety of motorists, pedestrians, and bicyclists. Such safety issues include travel speed along internal roadways, line of sight at Project Area entrances, width and setback of pedestrian facilities, buffering of bicycle facilities, and queueing of cars at intersections.

With conformance to applicable safety design standards as set forth by the County and Caltrans, the Proposed Project would adequately facilitate pedestrian and bicyclist travel, and impacts would be less than significant.

The Draft EIR analyzed the proposed improvements for the Proposed Project (including the 4.5-mile pedestrian Community Pathway and the separate bicycle lanes along Proctor Valley Road) as well as the required improvements north of the Project Area and traffic hazards. No further response is required or provided.

- O-2-10** The comment states that the Proposed Project excludes the State of California's ownership in Village 14 and Planning Area 16 which is approved for development per the County's General Plan and the Otay Ranch GDP/SRP and requests the potential for this future development in both cumulative and growth inducement analysis be analyzed.

The County does not agree with the comment. The cumulative and growth inducing impacts of development of Otay Ranch, including the Proposed Project and the state's ownership, were analyzed in the Otay Ranch Program EIR. The Proposed Project is consistent with the Otay Ranch GDP/SRP. Any proposal to develop the state's ownership would be required to either be consistent with the Otay Ranch GDP/SRP or to process a General Plan Amendment and analyze such changes. Further, while the state's ownership remains approved for development, there is no pending application for development nor any reasonably foreseeable project. Please refer to **Response to Comment O-2-12** and **Thematic Response – Inducements to Growth**.

- O-2-11** The comment requests clarification as to whether the growth inducement analysis accounts for the fact that the original planning documents proposed septic in Planning Areas 16/19, not sewer. The comment also states that the community of Jamul does not support the extension of sewer within their planning boundaries.

To clarify, the original planning documents for Otay Ranch did not propose septic in Planning Areas 16/19. Since adoption of the Otay Ranch GDP/SRP in 1993, the Otay Ranch GDP/SRP has stated that "[t]he provision of sewer service is not precluded in Planning Areas 16 and 19." Thus, the Otay Ranch PEIR accounted for possible sewer extension into Planning Areas 16/19 when it conducted its growth inducement analysis. As discussed in **Response to Comment O-2-3**, the Otay Ranch PEIR concluded that the Otay Ranch GDP/SRP would have significant growth inducing impacts. Moreover, the Otay Ranch Resource Management Plan (RMP), also part of the original 1993 Otay Ranch planning documents, includes Figure 15 which allows for, and depicts the conceptual location of, the sewer facilities in Planning Areas 16

and 19. Because the original Otay Ranch planning documents assumed that sewer, not septic, would be provided in Planning Areas 16/19, the Otay Ranch PEIR – and, by virtue of CEQA tiering, this Draft EIR – both account for the growth-inducing impacts of sewer.

As discussed in Section 3.1.5, Population and Housing, page 3.1.5-12, of the Draft EIR:

[T]he sewer service that would be extended to the Proposed Project has been anticipated and assumed into the regional system since the Otay Ranch GDP/SRP was originally approved in 1993. In July 2016, the City of Chula Vista and the County of San Diego entered into a sewer transportation agreement that only allows units approved in Otay Ranch to use the sewer that would be extended to the Proposed Project.

As noted above in **Response to Comment O-2-7**, because the Jamul village core is not within the boundaries of Otay Ranch, the referenced sewer transportation agreement precludes extension of the sewer to the Jamul village core. Thus, the County does not agree with the comment that sewer could be extended into the Jamul village core.

Please refer to the **Thematic Response – Inducements to Growth** and **Thematic Response – Sewer/Septic**.

O-2-12 The comment questions why the traffic impact analysis accounts for the hypothetical development of the state preserve property, while the growth inducement and cumulative analyses do not.

The County notes that traffic impact assessments and growth inducement assessments measure different kinds of impacts that require different sets of assumptions. A traffic impact analysis typically assumes that all properties within a given study area will be developed consistent with their underlying land use designations. This allows the traffic analyst to place the project's estimated traffic within a "worst case" traffic context (i.e., one in which the "ambient" traffic is at its highest anticipated level). In this case, the state-owned property in question, despite being managed as the Jamul Ecological Reserve, is nevertheless approved for development within the County's General Plan. For this reason, the County determined that the Transportation Impact Study (Appendix 2.9-1 of the Draft EIR) should assess the potential traffic generated by the underlying land uses. Thus, Appendix 2.9-1 assumes that the state-owned lands could be developed and generate traffic.

A growth inducement analysis, by contrast, focuses on the *project's* ability to stimulate growth or remove existing obstacles to growth. In such an analysis, it is largely irrelevant whether land beyond the project boundary will or will not be developed, as the only issue under consideration is whether the project – not some other development – will induce growth.

For additional information on growth inducement, please refer to **Thematic Response – Inducements to Growth**.

O-2-13 The comment notes that Proctor Valley Road will provide the main access to the Proposed Project, while Whispering Meadows Lane will provide secondary access through Planning Area 16. The comment correctly describes the access discussed in 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.

O-2-14 The commenter states that the Proposed Project does not include sufficient traffic, pedestrian, equestrian, cyclist, or off-road vehicle improvements in the rural residential areas of Jamul. The comment also states the proposed roadway and pathway linkage between the Urban Otay Ranch Villages and eastern territories of Chula Vista will abruptly end at the northern end of the Proposed Project boundaries, in a rural community that the comment describes as “plagued by hazardous roadways.”

First, off-road vehicles are not permitted within the Project Area and off-road vehicle improvements are not proposed within the Proposed Project.

As to the comment that the Proposed Project does not include sufficient transportation related improvements in the rural residential areas of Jamul, the Draft EIR Section 2.9, Transportation and Traffic, analyzes potential impacts relative to all transportation modes. Where significant impacts are identified, mitigation is proposed. No significant impacts were identified in the rural residential areas of Jamul with the exception of the intersection SR-94 and Lyons Valley Road, for which mitigation is proposed. As to SR-94 and Lyons Valley Road, please refer to **Response to Comment I-1-2** and **Thematic Response – SR-94 Improvements**.

The Proposed Project is constructing the Community Pathway along Proctor Valley Road as a project design feature. The proposed Community Pathway is consistent with the County of San Diego General Plan. The Proposed Project Applicant does not, however, control the right-of-way outside of the Proposed Project boundary to the north. There is no impact nexus to require the Proposed Project Applicant to

construct the Community Pathway beyond the Proposed Project. It will be the responsibility of the County to extend, connect, coordinate and implement the off-site Trails Master Plan recommendations. Trail connections to off-site facilities will be provided within the Proposed Project.

Please refer to the Draft EIR Section 3.1.7, Recreation, regarding the proposed trails and implementation.

With respect to whether Jamul is currently plagued with hazardous roadways, as alleged in the comment, the Draft EIR assessed project-related traffic and determined it would not significantly affect existing roadways in Jamul, with the exception of the intersection at SR-94 and Lyons Valley Road (see **Thematic Response – SR-94 Improvements**). For additional information on this topic, see **Responses to Comments O-2-15 and O-2-16**.

O-2-15 The comment requests that the existing roadway hazards in the rural residential areas of Jamul located within the traffic study radius be analyzed.

The Draft EIR Section 2.9 Transportation and Traffic, specifically, Section 2.9.3.6, Hazards Due to an Existing Transportation Design Feature, addresses the potential impacts and mitigation associated with existing roads. As described therein (Draft EIR, page 2.9-51):

[T]he existing unimproved northern portion of Proctor Valley Road ... would be paved substantially in its existing width and alignment to provide public access and secondary emergency access to Chula Vista and Jamul. The northern portion of Proctor Valley Road alignment is approximately 1 mile in length and is located outside of the Development Area but within the Project Area, and is considered an off-site improvement.

As analyzed in Section 2.9, Transportation and Traffic, the Proposed Project would add a maximum of approximately 900 ADT to the portion of Proctor Valley Road, north of the Project Area, and would improve Proctor Valley Road as described above. Further, the Draft EIR explains on page 2.9-51 that:

Proposed circulation improvements would be reviewed and approved by County transportation engineers (and Caltrans, as applicable) to ensure that the design conforms with the County Code of Regulatory Ordinances and applicable roadway/highway design manuals as they apply to the safety of motorists, pedestrian, and bicyclists. Such safety issues include travel speed

along internal roadways, line of sight, width and setback of pedestrian facilities, buffering of bicycle facilities, and queuing of cars at intersections.

In addition, the Proposed Project will be required to participate in the County of San Diego's Transportation Impact Fee (TIF) Program, which provides funding for roadway improvements (existing/future) throughout the County, including within the Jamul Community.

Further, the comment expresses the commenter's opinion that the existing condition is a hazard. As analyzed in Section 2.9, Transportation and Traffic, the Proposed Project would only result in one significant impact north of the Project Area, within the community of Jamul, at the intersection of SR-94 and Lyons Valley Road. There are no other significant off-site impacts or improvements proposed or required by the Proposed Project and, therefore, no nexus to require such improvements to an existing condition. No further response is required or provided.

- O-2-16** The comment expresses the commenter's opinions regarding eleven intersections and roadway segments identified in the comment. The comment states the roadway segments and intersections have existing hazardous geometry, pavement, shoulder conditions, and lack of sight distance such that these roadways cannot safely transport vehicles due to their curves, and the traffic from the Proposed Project will increase the problem. Finally, the comment requests that the identified roadways and intersections be further analyzed relative to hazards to motorists, pedestrians, bicyclists, equestrians, and off-road vehicles.

The County does not agree that the intersections and road segments identified in the comment require further analysis. As discussed in **Response to Comment O-2-15**, Draft EIR Section 2.9.3.6, Hazards Due to an Existing Transportation Design Feature, addresses the potential impacts associated with existing roads. The County refers the commenter to **Response to Comment O-2-15**.

Furthermore, as to the amount of traffic that would be added to the subject roads, the Proposed Project would add a relatively small amount of traffic. For example, only 4% to 7% of the Proposed Project traffic is anticipated to access the Jamul community, as shown in Figure 7-1 of the Proposed Project TIS. As shown in Figure 7-3 of the Proposed Project TIS, the Proposed Project would add the following amount of traffic to the intersections and roadway segments listed in the comment:

1. Melody & SR-94 – the Proposed Project would add 10 AM and 13 PM peak hour trips. No significant impacts were identified at this intersection; therefore, no improvements are required.
2. Proctor Valley Road & Coyote Road – Coyote Road is a private road to which the Proposed Project is not anticipated to contribute any additional traffic.
3. Melody Road & Proctor Valley Road – the Proposed Project would add 38 AM and 50 PM peak hour trips. No significant impacts were identified at this intersection; therefore, no improvements are required.
4. Schlee Canyon Road & Proctor Valley Road – the Proposed Project would add 19 AM and 25 PM peak hour trips. No significant impacts were identified at this intersection; therefore, no improvements are required.
5. SR-94 & Maxfield Road – the Proposed Project is not anticipated to add any additional traffic to this intersection.
6. Pioneer Way & Proctor Valley Road – Pioneer Way is a private road to which the Proposed Project is not anticipated to contribute additional traffic.
7. Maxfield Road & Proctor Valley Road – the Proposed Project would add 19 AM and 25 PM peak hour trips. No significant impacts were identified at this intersection; therefore, no improvements are required.
8. Lyons Valley Road & Jefferson Road – the Proposed Project would add 7 AM and 9 PM peak hour trips to Lyons Valley Road, and no trips to Jefferson Road (north of SR-94).
9. Whispering Meadows & Valley Knolls Road – the Proposed Project would add 7 AM peak hour trips and 9 PM peak hour trips to Whispering Meadows Lane and Valley Knolls Road.
10. Vista Diego & SR-94 – the Proposed Project would add 7 AM and 9 PM peak hour trips to SR-94 at this location, and no trips to Vista Diego Road.
11. Vista Sage & SR-94 – the Proposed Project would add 7 AM and 9 PM peak hour trips to SR-94 at this location, and no trips to Vista Sage Lane.

Please also refer to **Response to Comment O-2-15**.

O-2-17 The comment states that the Jamul area roadways consist of two narrow lanes that do not meet current traffic standards, lack shoulders, have no walkways, often contain 90 degree turns and contain no clear signage directing individuals to SR-94. The

comment contends the Proposed Project's increase in traffic will result in a significant safety hazard by exacerbating the existing problem.

The Draft EIR Section 2.9.3.1 Roadway Segments analyzed and describes that only 4% to 7% of the Proposed Project traffic is anticipated to access the Jamul community. Due to the low volume of Proposed Project traffic that is anticipated to access the Jamul Community, no significant transportation related impacts were identified on County of San Diego controlled facilities within the Jamul community.

As previously noted, the Proposed Project will be required to participate in the County of San Diego's Transportation Impact Fee (TIF) Program, which provides funding for roadway improvements throughout the County, including within the Jamul Community. Please also refer to **Responses to Comments O-2-15 and O-2-16**.

- O-2-18** The comment states that there are at least eight school bus stops in the area of Jamul, where children have no safe pedestrian walkway under existing conditions and will be put at greater risk due to the Proposed Project's anticipated increase in traffic.

While the comment does not identify the location of the existing bus stops within Jamul, the existing conditions of the area of Jamul are nevertheless outside the Proposed Project boundaries and proposed improvements. There are no significant off-site impacts or improvements proposed or required by the Proposed Project and therefore no nexus to require such improvements to an existing condition. No further response is required or provided.

- O-2-19** The comment states a lack of bike lanes and shoulders creates conflicts between motorists, pedestrians and cyclists, and refers to an accident in which a child was moving trash cans to the end of the driveway and was struck by a car. Please refer to **Response to Comment O-2-15**.

- O-2-20** The comment states that many horseback riders, mountain bikers, and hikers regularly cross or travel Proctor Valley Road in order to get to one of the few entrances to the Preserve.

The comment is referring to MSCP Preserve entrances that are located outside the scope of the Proposed Project boundaries and proposed improvements outside of the Proposed Project. Please refer to **Response to Comment O-2-15**. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- O-2-21** The comment asks how the Proposed Project will ensure that horseback riders, mountain bikers, and hikers that regularly cross or travel Proctor Valley Road in order to get to one of the few entrances to the Preserve will not be harmed.

The existing conditions of the Preserve entrances are outside the scope of the Proposed Project boundaries and proposed improvements. Please refer to **Response to Comment O-2-15**.

- O-2-22** The comment restates the Proposed Project includes the construction of an approximately 4.5-mile Community Pathway along Proctor Valley Road from Chula Vista to Jamul, and a 1.5-mile park-to-park pedestrian connection.

For clarification, the Proposed Project's park-to-park pedestrian connection is 3.5 miles. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- O-2-23** The comment requests that the proposed Community Pathway along Proctor Valley Road and the DG walkway along Whispering Meadows Lane be extended to SR-94. The County acknowledges this request.

The Proposed Project Applicant does not control the right-of-way outside of the Proposed Project boundary and there is no impact nexus to require the applicant to construct the facilities out to SR 94. It will be the responsibility of the County to extend, connect, coordinate and implement the off-site Trails Master Plan recommendations. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- O-2-24** The comment requests mitigation measure M-TR-2 be revised to require installation of a traffic signal at the intersection of SR-94 and Lyons Valley Road prior to the issuance of a building permit for the first EDU, rather than the 741st EDU as proposed.

As stated in the Draft EIR Section 2.9, Transportation and Traffic, signalization by the 741st equivalent dwelling unit would fully mitigate the impact at the intersection of SR-94 and Lyons Valley Road. Therefore, the Proposed Project would not be required to implement the improvement until that time. The County notes that the traffic signal improvements are currently being implemented as of September 2018. Please refer to **Response to Comment I-1-2** and **Thematic Response – SR-94 Improvements**.

- O-2-25** The comment states that the rural residential road Whispering Meadows Lane needs to be improved off site, along with Valley Knolls Road to Proctor Valley Road, all the way to SR-94. The County does not agree with the comment.

As noted in Draft EIR Section 2.9, Transportation and Traffic and Section 4.5 of the Transportation Impact Study (Appendix 2.9-1 to the Draft EIR), the Proposed Project is anticipated to add only 7 AM peak hour trips and 9 PM peak hour trips to Whispering Meadows Lane and Valley Knolls Road. Therefore, the Proposed Project would not have a significant impact to these roadways per the County's Threshold for Determining Significance, and thus would not be required to improve Whispering Meadows Lane or Valley Knolls Road. It should be noted that a portion of the southerly end of Whispering Meadows Lane would need to be improved to provide the required transition from existing to new roadway connection.

- O-2-26** The comment expresses the commenter's opinions that the sewer/septic feasibility study (Draft EIR, Appendix 3.1.8-3, Septic Feasibility Study) contains incomplete assumptions not supported by factual data. The comment further expresses that the Septic Feasibility Study relies on "two principles reasons" for finding the on-site wastewater treatment not feasible.

The Draft EIR Section 3.1.8, Utilities and Service Systems; Appendix 3.1.8-1, Sewer Service Plan; and Appendix 3.1.8-3, Septic Feasibility Study, analyzed the provisions and implementation of the various wastewater treatment options. The Draft EIR determined that the final design criteria and specifications for sewage facilities would comply with applicable County requirements and policies, and would be subject to review and approval by the Director of Public Works and appropriate regulatory agencies. Please refer to **Thematic Response – Sewer/Septic** and **Response to Comment O-2-28**.

- O-2-27** The comment suggests that the Proposed Project could be designed with open space lots abutting the public roads rather than homes, thus circumventing the County policy requiring that homes adjacent to a public sewer be allowed to connect to the sewer.

The comment recommends that the County consider a project alternative that would place open space lots rather than homes next to public roads, thereby eliminating the need to connect the new homes to sewer service. Such an alternative is not required. The Draft EIR already includes a reasonable range of alternatives as explained in **Thematic Response – Alternatives**, which, as CEQA requires, were designed to address one or more of the Proposed Project's significant impacts. The alternative

suggested by the comment does not seek to reduce an identified significant effect of the Proposed Project; instead, it merely serves the commenter's preference that sewer service be precluded in Jamul, which is already precluded by the existing agreement by the City of Chula Vista and the County.

Please also refer to **Thematic Response – Sewer/Septic**.

- O-2-28** The comment claims that none of the test sites in the Eastern area of Planning Area 16 investigated sufficient open areas in each lot to justify a not feasible finding. The comment also asserts that an alternative on-site wastewater treatment system that does not rely on “permeability” was not sufficiently investigated in all areas of the proposed parcels in Planning Areas 16/19. The comment further states that the Septic Feasibility Study's conclusion that the tested areas were “not generally” conducive to on-site wastewater treatment (Appendix 3.1.8-3, page 1 of AGS Report No. 1312-02-B-8R) is not proof of a prohibited soil condition on any proposed parcel.

The County notes that the study was a feasibility level analysis and was not intended to be a lot-by-lot specific design level study. The County Department of Environmental Health reviewed the Septic Feasibility Study along with additional septic and geologic studies in the Project Area and concluded that “the majority of the site is not suitable for the use of onsite wastewater treatment systems” (see Appendix 8-2, Letter from County Department of Environmental Health Land and Water Quality Division, dated June 20, 2017).

The Septic Feasibility Study describes in detail the methodology used and the reasons that not all lots were analyzed. The tested areas were culled from the overall area through a series of preliminary evaluations for suitability. For example, preliminary investigations eliminated lots with slope gradient in excess of 40% and those with exposed hard rock, as on-site wastewater treatment systems (OWTS) are infeasible under such conditions. Based on the feasibility evaluation, the study concluded that it was highly unlikely that suitable conditions would exist across the large areas that would be needed on individual lots. Additional reasons for eliminating certain lots from the study are described in Appendix 3.1.8-3, Septic Feasibility Study.

With regard to the alternative OWTS referred to in the comment, the Septic Feasibility Study did, in fact, review the feasibility of the alternative system. The alternative, referred to as a Supplemental Treatment System (STS) with a drip dispersal system, is the only viable option where there are shallow soil or groundwater conditions. However, the commenter's statement that these systems do not rely on ‘permeability’ is incorrect. Use of STS with a dispersal system does not

preclude the need for ‘permeable’ soil, it just reduces the thickness of the permeable soils. The Septic Feasibility Study evaluated the suitability of a STS with drip dispersal system as no other OWTS could meet current permitting requirements and concluded that the system was not feasible.

Please also refer to the **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.

- O-2-29** The comment states that Volume 2 of the Otay Ranch Master Plan (the Otay Ranch GDP/SRP) does not mandate or guarantee the use of sewer. The comment states that a complete, detailed investigation of all residential parcels in Planning Areas 16/19 is necessary.

The County disagrees that a detailed investigation of all parcels in Planning Areas 16/19 is required. Please refer to **Responses to Comments O-2-26 and O-2-28** and **Thematic Response – Sewer/Septic**.

- O-2-30** The comment states that without a detailed suitability study, the Jamul/Dulzura Community Plan’s prohibition of sewer cannot be ignored or overridden.

While the comment references the Jamul/Dulzura Community Plan’s prohibition on sewer use, Land Use Policy 15 of the Jamul/Dulzura Community Plan indicates that the provisions of the Otay Ranch GDP/SRP (i.e., Otay Subregional Plan Volume 2) take precedence in the event of any conflict between the Otay Subregional Plan Volume 2 and the Jamul Dulzura Community Plan. In this case, the provisions of Otay Subregional Plan Volume 2 allow for, and assume the provision of, sewer service in Planning Areas 16/19. Per Policy 15, these provisions take precedence. Please refer to **Responses to Comments O-2-26 and 28** and **Thematic Response – Sewer/Septic**.

- O-2-31** The comment expresses a general concern over the adequacy of fire protection from wildfires and emergency response times and the adequacy of the evacuation routes on the existing roadways to the north.

Please refer to Section 3.1.1.2.4 Wildfire Hazards; Section 3.1.1.2.5 Emergency Response Plans; Section 3.1.6.2.1, Fire Protection; and Appendix 3.1.1-3, Wildland Fire Evacuation Plan, in the Draft EIR. The Draft EIR adequately analyzed the Proposed Project’s impacts under CEQA. Please also refer to **Thematic Response – Wildfire Protection and Evacuation**.

O-2-32 The comment quotes information from the Draft EIR regarding Northern Park (P-4). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-2-33 The comment questions what ratio was utilized to select 1.4 acres for the park closest to Jamul and offers an opinion that the park is too small to accommodate internal and external generated use of a “Public Park” in their planning area.

The Draft EIR, Section 3.1.7 Recreation and the proposed Specific Plan, addresses the function, use and location of public and private park facilities of the Proposed Project. Consistent with the County General Plan and the County Park Land Dedication Ordinance, and in satisfaction of the Jamul Local Park Planning Area, the Proposed Project would be required to provide 1.1 acres of improved park land to serve the 125 dwelling units within Planning Areas 16/19. However, the Proposed Project provides 1.4 acres of improved park land in the P-4 Northern Park located within Planning Area 16. As stated in the Draft EIR, the proposed on-site park facilities are sufficient to accommodate the Proposed Project population pursuant to requirements of the County’s Park Land Dedication Ordinance. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided

O-2-34 The commenter expresses an opinion that Jamul currently does not have any public parks that the residents can frequent. The comment also states the Proposed Project should analyze that Jamul residents will travel to the new park and this park should be sized appropriately.

The comment addresses an existing condition regarding the availability of parks in Jamul and expresses the commenter’s opinion regarding the sizing of parks for off-site residents. The existing conditions of parks in Jamul is not an issue caused by implementation of the Proposed Project and, thus, not subject to CEQA analysis or required to be analyzed in the Project EIR. The County notes that the Draft EIR does analyze traffic and associated impacts to parks. As shown in Table 2.9-11, Project Trip Generation – Build Out, of the Draft EIR, the traffic analysis (and accordingly the operational air quality, greenhouse gas and noise analysis) assumed five ADT per acre of parkland. Thus, traffic to the project parks was included in the analysis. Sewer and water usage was included as demonstrated in Tables 3.1.8-1, Otay Ranch Village 14 and Planning Areas 16/19 Projected Potable Water Demands and 3.1.8-7, Village 14 and Planning Areas 16/19 Projected Sewage Flows. Further, the physical impacts of construction of park uses were included throughout the Draft EIR.

The Draft EIR, Section 3.1.7 Recreation and the proposed Specific Plan, addresses the function, use and location of public and private park facilities of the Proposed Project. As noted on page 3.1.7-13 of the Draft EIR, “the Project Area is located in the Jamul community planning area, which requires 390.73 square feet dedicated per dwelling unit or lot.” Based on 1,119 dwelling units, the Proposed Project would require a total of 10.04 acres of parkland (see Draft EIR at 3.1.7-14). The Proposed Project includes four public parks totaling 15.2 acres and 9.5 acres of private parks, for a total of 24.7 acres of park land. Of this amount, 11.1 acres would be eligible for credit under the County’s Park Land Dedication Ordinance; thus, the Proposed Project exceeds the requirement for parks (see Draft EIR at 3.1.7-14). The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-2-35 The comment asks whether the Northern Park (P-4) includes a staging area. The comment also expresses the commenter’s opinion that a staging area should be provided in the northern portion of the Project Area for the safety of pedestrians, equestrians, and off-road vehicle users. For clarification, off-road vehicle use is not permitted or proposed within parks or open space in the Proposed Project. The Draft EIR and Specific Plan describe the function, intent and use of P-4 within Planning Area 16 (see Draft EIR, pages 1-11 and 3.1.7-14, and Otay Ranch Village 14 and Planning Areas 16/19 Specific Plan, page 44). The proposed Northern Park does include a parking lot. The County further notes there is a staging area in the Village Core at the Village Green Park (P-2). Further, the proposed 4.5-mile Community Pathway provides a spur of the multi-use trail segment into P-4. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-2-36 The comment requests that the source of maintenance fees be clearly identified. Please refer to Otay Ranch Village 14 and Planning Areas 16/19 Specific Plan, Table 8: Construction and Responsibilities for Facilities and Infrastructure and the Design Guidelines for Planning Area 16 for information on function, use and funding resource for maintenance fees. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

O-2-37 The comment asks if single-family lots adjacent to Proctor Valley Road in Jamul were analyzed and whether these residents would get noise barriers.

The Draft EIR, Section 2.8, Noise, analyzes the Proposed Project’s noise impacts. Specifically, Section 2.8.3.1 Noise-Sensitive Land Uses and Section 2.8.3.3

Groundborne Vibrations, analyzed existing conditions and impacts to off-site traffic noise. Section 2.8.7.1, Conclusion, states:

Proposed Project traffic noise impacts at existing off-site Noise Sensitive Land Uses would be less than significant, with the exception of residences located along Proctor Valley Road north of the Project Area and west of Melody Road (Impact N-3). Compared to existing traffic noise levels, a significant increase in traffic noise along this roadway segment would occur because Proctor Valley Road currently experiences very low traffic volumes, and although the resulting noise level of 51 dBA CNEL is considered acceptable per the County's criteria, the Proposed Project would increase noise above existing ambient levels by greater than 10 dBA. Moreover, because there is no feasible mitigation, this impact would be **significant and unavoidable**.

Proposed mitigation measures include “noise barriers, road surface improvements, regulatory measures (such as lower speed limits), and traffic-calming devices (such as speed bumps).” However, the Draft EIR determined the following (Section 2.8, Noise, page 2.8-31):

[N]one of these measures are considered feasible for this impact. For example, constructing noise barriers (e.g., sound walls) on private property would require permission of the property owner and would raise potential liability and maintenance concerns. Additionally, to be most effective, noise barriers would need to be continuous, but due to the need for driveways and other access points, the continuity of the barrier and its effectiveness would be limited. For these reasons, mitigation for off-site impacts from noise level increases along Proctor Valley Road north of the Project Area and west of Melody Road is considered infeasible.

Therefore, impacts to residences on Proctor Valley Road, between Echo Valley Road and Shadow Valley, as shown on Figure 2.8-5, are considered significant and unavoidable for purposes of the analysis.

Regarding vibration impacts, the Draft EIR analyzed such impacts in Section 2.8.3.3, Groundborne Vibrations, and Section 2.8.5, Significance of Impacts Prior to Mitigation. The Proposed Project has the potential to result in significant off-site impacts:

Construction activities that could produce high vibration levels ... at the same residences to the north and west of off-site Proctor Valley Road improvements in Jamul and the City of Chula Vista, identified as part of the construction noise impact assessment, above, located approximately 60 feet and 140 feet away. At a distance of 60 feet and greater, vibration levels from grading activities are anticipated to exceed 0.004 inches per second RMS or 0.1 inches per second PPV at the nearest off-site residences. This would be a **potentially significant impact (Impact N-11)**.

The Draft EIR also identified a potentially significant impact (Impact N-13) related to blasting, “because the exact blasting locations, necessary geotechnical data, and blasting and materials handling plans are not known at this time, it is not possible to conduct a groundborne vibration analysis assessing the proposed blasting and materials handling associated with the Proposed Project.”

As described in the Draft EIR, Section 2.8.7.3, blasting impacts would be reduced to less than significant with implementation of mitigation measure M-N-8 preparation of a blasting and monitoring plan. Mitigation measure M-N-10, a Vibration Plan, would reduce potential groundborne vibration impacts from construction to less than significant.

- O-2-38** The comment requests that wording be added to noise mitigation measures to provide direct project contacts in the event that local residents are experiencing unacceptable nuisance noise and need to make the Proposed Project and County aware of the issue.

Under CEQA, mitigation does not include contact information for project applicants or county personnel. The County provides resources on the SanDiegoCounty.gov website regarding noise complaints under Planning and Development Services Department. Any individual may file a complaint to County Code Enforcement regarding nuisance noise, which is regulated by County Ordinance and with which the Proposed Project is statutorily required to comply.

- O-2-39** The comment requests an analysis regarding how the Proposed Project adheres to the JDCPG “Dark Skies Policy.” The commenter expresses the opinion that the Proposed Project has “significant higher density in Village 14 and smaller lot sizes than presently exists in Jamul.”

The Draft EIR Section 2.1.2.3, Light and Glare, and the Specific Plan Appendix’s Preserve Edge Plan, Village Design Plan, and Design Guidelines offer specifics on reducing or eliminating light issues. The Draft EIR Section 2.1, Aesthetics, analyzes

how the Proposed Project would conform to the County's Dark Sky Ordinance. As stated in the Draft EIR:

[T]he Proposed Project would conform to applicable local regulations (i.e., the County's Light Pollution Code) related to dark skies. The Preserve Edge Plan further restricts lighting adjacent to the Preserve to reduce indirect lighting impacts and comply with the Dark Sky Ordinance... Although development of the Proposed Project would contribute new sources of light to the surrounding area ... lighting for the Proposed Project would be designed to adhere to the regulations of the County Light Pollution Code (the Dark Sky Ordinance).

Further, as discussed in Table 2.1-1, Consistency Analysis – Visual Resources Policies, the Proposed Project would be consistent with the Astronomical Dark Skies Policy of the Otay Ranch GDP/SRP by designing and placing lighting fixtures to adhere to regulations of the County Light Pollution Code (Dark Sky Ordinance). Impacts from light and glare were fully analyzed in the Draft EIR and were determined to result in less than significant impacts. Please refer to **Responses to Comments O-6-409 through O-6-414**.

O-2-40 The comment states the environmental analysis should include the impacts of the design on the MSCP areas in the Proposed Project as previously agreed upon in the Baldwin Letter signed in November 10, 1995. Please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**.

O-2-41 The comment states the Draft EIR needs to analyze impacts related to the Proposed Project's consistency with the MSCP County Subarea Plan and "how the project integrates [the MSCP's] strategies with the rest of future Village developments."

Figure 2.4-16 of the Draft EIR depicts the Project Area, Project Applicant-owned Otay Ranch 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 U.S. Department of Defense). As analyzed in the Draft EIR, Sections 2.4.3.5 and 3.1.3.2.3, the Proposed Project is consistent with the MSCP County Subarea Plan. Further, as explained in **Response to Comment A-3-17**, the Proposed Project will mitigate its biological resource impacts for development within PV1, PV2, and PV3 at the levels required under the BMO, which are greater than those required under the Otay Ranch RMP. Accordingly, the County has incorporated a BMO analysis and findings for PV1, PV2, and PV3 into the Draft EIR as Appendix A to the Biological Resources Technical Report (Appendix 2.4-1 to the Draft EIR),

thereby, using both CEQA and the BMO, in concert, to achieve the MSCP County Subarea Plan's conservation goals and the Implementing Agreement to determine MSCP Subarea Plan consistency. In addition, the Draft EIR, Section 2.4.4, Cumulative Impact Analysis, determined "The Proposed Project would be consistent with the applicable planning documents, and no cumulative impacts would result under this guideline." Please refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.

- O-2-42** The comment expresses the commenter's opinion that the Proposed Project is converting a significant portion of potential grazing land into a master planned community and should provide meaningful preservation of the rural agricultural community character. The comment requests clarification for how the Otay Ranch Agricultural Plan establishes a path for ensuring that local agricultural resources are not lost.

Agricultural uses have not occurred in the Project Area since 1996. The Draft EIR Section 2.2, Agricultural and Forestry Resources, provides a history of the Otay Ranch GDP/SRP and describes the past actions taken to remove grazing from open space areas back in 1996 (including the Proposed Project), as well as analyzing impacts to agricultural resources. The Draft EIR states:

The Proposed Project would result in loss of an agricultural resource for the potential production of coastal-dependent crops, due to its location in a coast area climate zone and because the Project Area contains soils designated to have local importance. Because no mitigation measures are available to reduce the Proposed Project's impacts to agricultural resources to below a level of significance, these impacts would remain **significant and unavoidable**.

Please refer to Specific Plan Appendix 8, Agricultural Plan, which provides for interim uses of the Project Area prior to development of the Proposed Project.

- O-2-43** The comment suggests that the Agricultural Plan for the Proposed Project should support youth agricultural activities, such as 4H and/or FFA Chapter facilities to local schools and leasing activities to local farmers for active agriculture. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- O-2-44** The commenter asks about what type of uses will be incorporated into the agricultural mitigation lands. The Draft EIR, Section 2.2.5, Agricultural and Forestry Resources – Mitigation, states:

M-AG-1: As required by the Otay Ranch General Development Plan/Otay Subregional Plan (Otay Ranch GDP/SRP), an Agricultural Plan shall be prepared by the Proposed Project applicant, or its designee, prior to approval of any Specific Plan affecting on-site agricultural resources and will be required for each subsequent development proposal (i.e., villages, Town Center, the Eastern Town Center, the University, and Rural Estate Planned Community). The Agricultural Plan shall indicate the type of agricultural activity allowed as an interim use.

The County appreciates the commenter's opinions and suggestion of possible interim agricultural uses and programs. The County notes that there have been no interim agricultural uses on the Proposed Project. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- O-2-45** The comment provides concluding remarks. The comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further is response required or provided.

- O-2-46** The comment express the opinion that the Proposed Project would have immediate and long-term impacts to the rural community and possible adverse, serious changes to the Jamul community character and impacting quality of life.

The County acknowledges the comments and suggested revisions, and refers the commenter to **Thematic Response – Community Character and Plan Consistency**. This comment does not raise an issue regarding the adequacy of the Draft EIR; therefore, no further response is required or provided.

- O-2-47** The exhibit is the Proposed Project Tentative Subdivision Map overlaid on Figures 2-1 and 2-2 of the MSCP Draft EIR. The County has reviewed the exhibit and refers the commenter to **Response to Comment O-6-51, O-6-82, and O-6-94** and **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.