

**O-6.6 TO O-6.39 EHL ATTACHMENT LIST**

**O-6.6** The exhibit is a letter from the Wildlife Agencies to the County of San Diego dated April 14, 1995, regarding the Otay Ranch General Development Plan (Otay Ranch GDP/SRP) and the Multiple Species Conservation Program (MSCP). The County notes that the letter was written during the iterative MSCP Subarea Plan process and prior to execution of the March 1998 Implementing Agreement. Recital 1.1 of the Implementing Agreement states: “the MSCP is a product of lengthy study and negotiation by the Parties and other interested persons and entities, and represents coordination of private development and conservation interests with federal, state and local governments.”

The County has considered the exhibit and notes that it was prepared in 1995 and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-37** and **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.

**O-6.7** The exhibit is a letter from the Wildlife Agencies to the Baldwin Company dated February 22, 1996, regarding the Wildlife Agencies’ “comments on the Baldwin Company’s *proposed* Otay Ranch MSCP Plan Agreement, date November 10, 1995.” The County has considered the exhibit and notes that it was prepared in 1996 and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-42** and **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.

**O-6.8** The exhibit is a copy of the County of San Diego’s 2001 General Plan Amendment report regarding amendments to the Otay Ranch GDP/SRP to eliminate certain areas designated for residential development in Village 13 and Village 15, dated April 5, 2001. The County has considered the exhibit and notes that it was prepared in 2001 and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Responses to Comments O-6-48, O-6-49, and O-6-54**, and **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.

**O-6.9-1** The exhibit is the 2002 County of San Diego Board of Supervisors consideration of the Otay Ranch Conveyance Plan Revisions, General Plan Amendment 00-01(2) regarding the elimination of the Conveyance Schedule. The County has considered the exhibit and notes that it was prepared in 2002 and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Responses**

- to Comments O-6-50 and O-6-51, and Thematic Response – Baldwin Letter and PV1, PV2, and PV3.** No further response is required or provided.
- O-6.10** The exhibit is an email from Glen Laube (City of Chula Vista) to Eric Porter (USFWS) dated September 5, 2014, regarding components of the Baldwin Letter that were implemented in the City of Chula Vista. The County has considered the exhibit and notes that it was prepared in 2014 and that it was prepared by a separate jurisdiction (City of Chula Vista), which has a separate MSCP Subarea Plan and issued separate Interim Habitat Loss Permits to which the County was not a party. Therefore, the exhibit does not address an issue on the adequacy of the analysis contained in the Draft EIR. Please refer to **Response to Comment O-6-53 and Thematic Response – Baldwin Letter and PV1, PV2, and PV3.** No further response is required or provided.
- O-6.11** The exhibit is a report prepared by Bloom Biological dated January 19, 2018, on golden eagles in Rancho San Diego that provides background information on golden eagles. The County has considered the exhibit and notes that it was prepared in January 2018, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County further notes that golden eagle is a Covered Species under the MSCP County Subarea Plan. Please refer to **Response to Comment O-6-134 and Thematic Response – Golden Eagle.** No further response is required or provided.
- O-6.12-1** The exhibit is a copy of a June 6, 2013, letter from USFWS to the City of Chula Vista and County of San Diego regarding the potential transfer of Otay Ranch Preserve lands to the USFWS, CDFW, and BLM. The County has considered the exhibit and notes that it was prepared in 2013, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. As of the date of the Draft EIR, the land transfer discussed in the letter has not occurred. The County refers the commenter to **Response to Comment O-6-57 and Thematic Response – Baldwin Letter and PV1, PV2, and PV3.** No further response is required or provided.
- O-6.13-1** The exhibit is excerpted text and figures from the 1996 Recirculated Draft Joint EIR/EIS Issuance of Take Authorizations for Threatened and Endangered Species due to Urban Growth within the Multiple Species Conservation Program (MSCP) Planning Area (LDR No. 93-02897; SCH No. 93121073, City of San Diego). The County has considered the exhibit and notes that it was prepared in 1996, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to

- Responses to Comments O-6-67, O-6-68, and O-6-94, and Thematic Response – Baldwin Letter and PV1, PV2, and PV3.** No further response is required or provided.
- O-6.14** 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 **Responses to Comments 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.
- O-6.15** The exhibit is a May 2010 USGS article titled “The Response and Recovery of Animals and Plans to the 2003 and 2007 San Diego County Wildfires.” The County has considered the exhibit and notes that it was prepared in 2010, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County has reviewed the exhibit and refers the commenter to **Responses to Comments O-6-109 and O-6-110.** No further response is required or provided.
- O-6.16** The exhibit is a March 19, 2018, article from the San Diego Union Tribune regarding a lawsuit challenging the County’s Climate Action Plan. The County has considered the exhibit and notes that the Draft EIR does not rely upon, use or tier from the County’s Climate Action Plan; rather, the Proposed Project would mitigate GHG emissions to net zero with implementation of mitigation measures M-GHG-1 through M-GHG-4. Therefore, the exhibit does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to Comment O-6-188 and Thematic Response – CAP Consistency.** No further response is required or provided.
- O-6.17** The exhibit is a March 2016 report prepared by OKG Institute V. Berlin et al. on carbon offset credits. The County has considered the exhibit and notes that it was prepared in 2016, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to Comment O-6-191 and Thematic Response – GHG (Carbon Offsets).** No further response is required or provided.
- O-6.18** The exhibit is an April 2017 article by Nicholas Kusnetz supporting the opinions of **Comment Letter O-6-16** regarding carbon offset credits. The County has considered the exhibit and notes that it was prepared in 2017, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to**

**Comment O-6-191 and Thematic Response – GHG (Carbon Offsets).** No further response is required or provided.

- O-6.19** The exhibit is the GHG Section from the SANDAG Regional Plan EIR. The County has considered the exhibit and notes that it was prepared prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Responses to Comments O-6-230 and O-6-231**. No further response is required or provided.
- O-6.20** The exhibit is a copy of comments prepared by BEAR for Endangered Habitats League on the Safari Highlands Ranch EIR. The County has considered the exhibit and notes that it was prepared in December 2017 for another project located in the City of Escondido, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Responses to Comments O-6-259, O-6-265, O-6-285, O-6-286, and O-6-298**. No further response is required or provided.
- O-6.21** The comment is a Voice of San Diego article titled “County Officials Set to Consider Allowing Nearly 6,000 New Homes in High Wildfire Risk Areas.” The County has considered the exhibit and notes that it discusses other projects located primarily in North San Diego County unrelated to the Proposed Project. The article was published in December 2017, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to Comment O-6-259**. No further response is required or provided.
- O-6.22-1** The exhibit is an article entitled “Fire history of the San Francisco East Bay region and implications for landscape patterns.” The County has considered the exhibit and notes that it was prepared for another area (East Bay region), and was published in 2005, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to Comment O-6-262**. No further response is required or provided.
- O-6.23** The exhibit is an article entitled “Land Use Planning and Wildfire: Development Policies Influence Future Probability of Housing Loss.” The County has considered the exhibit and notes that it was prepared in 2013, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to Comment O-6-262**. No further response is required or provided.

- O-6.24** The exhibit is an article entitled “Human Influence on California Fire Regimes.” The County has considered the exhibit and notes that it was published in July 2007, prior to the release of the Draft EIR, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. The County refers the commenter to **Response to Comment O-6-262**. No further response is required or provided.
- O-6.25** The exhibit is a letter from the Conservation Biology Institute to Ed Pert (CDFW), dated May 21, 2016, regarding the “Proposed land swap in Proctor Valley in the context of unfulfilled MSCP conservation obligations and failure to document net benefit.” The County has considered the exhibit and notes that it was prepared in 2016, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-451** and Appendix 4.1-4, Land Exchange Alternative Biological Resources Technical Report. No further response is required or provided.
- O-6.26** The exhibit is a Los Angeles Times article titled “Alarming failures left many in path of California wildfires vulnerable and without warning,” dated December 29, 2017, regarding the 2017 Northern California wildfires. The County has considered the exhibit and notes that it was prepared in 2017, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Responses to Comments O-6-305 through O-6-307**, and **Thematic Response – Wildfire Protection and Evacuation**. No further response is required or provided.
- O-6.27** The exhibit is a report titled “California’s Most Significant Droughts: Comparing Historical and Recent Conditions” prepared by the California Department of Water Resources. The County notes that the study is also relied on by OWD in its 2015 UWMP, page 8-1 (referencing the article titled “California’s Most Significant Droughts: Comparing Historical and Recent Conditions, DWR 2015”). The County has considered the exhibit and notes that it was prepared in February 2015, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-335** and **Thematic Response – Water Shortage/Drought**. No further response is required or provided.
- O-6.28** The exhibit is an article titled “California Water Year 2014 Among Driest Years on Record” prepared by the Association of California Water Agencies. The County has considered the exhibit and notes that it was prepared in September 2014, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-335** and **Thematic Response – Water Shortage/Drought**. No further response is required or provided.

- O-6.29-1** The exhibit is a study from the Journal of Climate titled “Assessing the Risk of Persistent Drought Using Climate Model Simulations and Paleoclimate Data.” The County has considered the exhibit and notes that it was prepared in October 2014, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-335** and **Thematic Response – Water Shortage/Drought**. No further response is required or provided.
- O-6.30** The exhibit is a study titled “Anthropogenic Warming Has Increased Drought Risk in California.” The County has considered the exhibit and notes that it was prepared in January 2015, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-335** and **Thematic Response – Water Shortage/Drought**. No further response is required or provided.
- O-6.31** The exhibit is a study titled “Contribution of Anthropogenic Warming to California Drought.” The County has considered the exhibit and notes that it was prepared in August 2015, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-335** and **Thematic Response – Water Shortage/Drought**. No further response is required or provided.
- O-6.32** The exhibit is a report titled “SDCWA Report on Carlsbad Desalination Plant Operations for Fiscal Year 2017” prepared by the San Diego County Water Authority. The report notes that “Many of these corrective actions have already produced positive results and Poseidon anticipates *the plant to be back at full capacity by next month*” [emphasis added]. The County has considered the exhibit and notes that it was prepared in August 2017, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-346** and **Thematic Response – Water Shortage/Drought**. No further response is required or provided.
- O-6.33** The exhibit is the San Diego County Water Authority 2015 Urban Water Management Plan. The County has considered the exhibit and notes that it does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Responses to Comments O-6-353 and O-6-357**. No further response is required or provided.
- O-6.34** The exhibit is an excerpt from the Newland Sierra Draft EIR. The County has considered the exhibit and notes that it does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Responses to Comments O-6-353 and O-6-357**. No further response is required or provided.

- O-6.35** The exhibit is information from the FlagstaffDarkSkies.org website (<http://www.flagstaffdarkskies.org/dark-matters-2/>). The County has considered the exhibit and notes that it does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Response to Comment O-6-474**. No further response is required or provided.
- O-6.36** The exhibit is report from USGS, which provides a habitat selection model for golden eagles. The exhibit provides information regarding modeled golden eagle habitat. The County has considered the exhibit and notes that it does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Thematic Response – Golden Eagle**. No further response is required or provided.
- O-6.37** The exhibit is a copy of the County of San Diego’s 2001 General Plan Amendment Minute Order, General Plan Amendment Resolution, and revisions to the Otay Ranch GDP/SRP to Village 13 and Village 15. The County has considered the exhibit and notes that it was prepared in 2001, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Responses to Comments O-6-48, O-6-49, and O-6-54, and Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.
- O-6.38** The exhibit is excerpts from a copy of the Draft San Diego County MSCP Subarea Plan. The County has reviewed the exhibit and notes that it is from the Draft MSCP County Subarea Plan that was prepared in June 1996, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.
- O-6.39** The exhibit is excerpts from a copy of the Draft City of Chula Vista MSCP Subarea Plan. The County has reviewed the exhibit and notes that it was from the Draft Chula Vista MSCP and was prepared in August 1996, and therefore does not address an issue on the adequacy of the analysis contained in the Draft EIR. Refer to **Thematic Response – Baldwin Letter and PV1, PV2, and PV3**. No further response is required or provided.

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