HGV SOUTH PROJECT RESPONSES TO COMMENTS INFORMATION FOR THE READER

Following the Planning Commission Hearing of May 25, 2018, several substantive items in the responses provided on this website were updated. Please note that individual responses have not been modified to reflect these changes. Because they may relate to more than one response, or be of interest to commenters who did not specifically previously focus a comment on the topic, these changes are presented here so that that are available to all readers.

1. The DEIR RTCs addressed traffic level of service (LOS) on area streets relative to Project direct effects (Project traffic added to existing traffic) as well as the contribution of Project traffic added to existing traffic and cumulative traffic. Cumulative traffic is the total of existing traffic loading combined with contributions from future projects (or future phases of projects) that are projected to put traffic on area roads, but are in planning stages, or approved but still not built.

No changes occur to Project traffic effects on existing traffic loading. For one segment of Country Club Drive, it is noted that at the time of the finalization of the HGV South cumulative scenario, the Valiano project proposed access at Hill Valley Drive, not Eden Valley Lane. This resulted in HGV South cumulative totals of 2,067 ADT from Valiano assuming the Hill Valley Drive access. Assuming access at Eden Valley Lane if the Valiano project is approved, this would add another 644 ADT (2,711 – 2,067) to this segment of Country Club between Hill Valley Drive and Kauana Loa. With these additional trips, the existing + cumulative projects condition is projected to change from 8,260 ADT (LOS D) to 8,904 ADT (LOS E). The further addition of 1,125 Project ADT results in a change from 9,385 ADT (LOS E) to 10,029 ADT (LOS F). This would constitute a cumulative impact. It is noted, however, that a cumulatively significant impact is already called out for this segment in the TIA and in the EIR on Table 2.2-6. Because the cumulative impact is already identified as significant, the addition of 644 ADT does not result in changes to CEQA conclusions of significance.

Similarly, the mitigation to (construct a northbound left-turn lane) proposed to alleviate cumulative LOS E conditions also would address LOS F cumulative conditions. This is because any disruption of flow to through traffic can cause queuing and excessive delay to the free-flow movement of traffic along a thoroughfare route, but alternatively, construction of a northbound left-turn lane would remove left-turning vehicles from the through traffic lane into the turn lane, and improve through flow. The County allows for the implementation of "spot improvements" to be used where deficient segment operations occur, particularly on roadways where there are no planned widening improvements, as is the case with Country Club Drive; and County staff consistently support and accept the practice of utilizing additional turn lanes, medians, etc. as capacity enhancing measures for roadway segments. The removal of turning vehicles from through-traffic lanes has been identified in literature published by the Transportation Research Board (TRB) as one of several principles that improve "the safety and operations of an arterial roadway" (TRB Report S2-C05-RW 2014). Moving turning vehicles from the through lane and clearing that lane for through traffic would sufficiently mitigate Country Club Drive operations.

As a matter of information, it is also noted that, ultimately, the future construction of Citracado Parkway as a four-lane Major Road alleviates the temporary near-term impacts along Country Club Drive, as shown in Table 10-2 of the HGV South TIA. Level of service C is indicated in the future according to the County General Plan with the inclusion of the General Plan Amendment projects in the area.

- 2. Also since Planning Commission, an element of the Greenhouse Gas (GHG) emissions mitigation measures follow-up has been deleted. This element was related to GHG offset credits purchased for operational impacts. The circulated Subchapter 2.7, *Greenhouse Gas Emissions*, text allowed for potential reductions in the amount of credits purchased if improvements in technology resulted in fewer Project-related emissions that required mitigation (offset). The Applicant has committed to purchase of the full number of credits identified in the current EIR, with no opportunity to reduce their purchase obligation.
- 3. In general, it is noted that responses to comments were authored following circulation of the Draft EIR (DEIR), and then again following circulation of the Revised Draft EIR (RDEIR), focused on greenhouse gas emissions (GHGs). As a result, additional GHG Project Design Features have been provided, and incorporated into the FEIR. The EIR provides the final source for such Project elements and controls in case of variation between responses.
- 4. It is also noted that although the RDEIR focused on GHGs analysis, and it was requested that comments address that topic, members of the public also provided comments on fire issues. Although not required, responses also were provided to those comments. Additionally, as described in DEIR responses to comments, an Evacuation Plan (AREPP) would be provided for the Project. This was prepared prior to Planning Commission and is available on the County website, as alluded to in responses to comments on the RDEIR.

For each of these modifications to substantive issues, the reader is hereby informed to assume global changes to affected Responses to Comments in these files.

In addition to the changes enumerated above, some other clarifying changes also were made. Non-editorial textual changes are provided in a "track changes" format, for ease of reader review.