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February 12, 2018

County Board of Supervisors
C/O Kevin Johnston, Land Use / Environmental Planner
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Property Specific Requests GPA DSEIR SCH No. 2015121012

Dear Mr. Johnston:

06-1 We represent Golden Door Properties, LLC ("Golden Door"), a world-class resort and agricultural operation in the rural Twin Oaks Valley area of San Diego County. The Golden Door is an industry leader in sustainability efforts, and has restored farming and beekeeping on its property—sharing its bounty at a community Farm Stand and through retail operations. As a local land owner, farmer, and employer, Golden Door honors its responsibility to our community by extending its support to local and regional organizations and well beyond. As such, the Golden Door is very interested in the environmental impacts of projects in the I-15 corridor and, we have been pro-actively communicating with the County of San Diego ("County") staff on these issues for several years.

06-2 We have reviewed portions of the Draft Subsequent Environmental Impact Report ("DSEIR") for the Property Specific Requests ("PSRs") General Plan Amendment and Rezone with particular attention to the cumulative impacts of the PSRs on traffic along the I-15 corridor, and throughout inland North County. Although we are not taking position on any of the PSRs at this time, we are concerned that the County is moving forward with a large number of General Plan Amendments in the I-15 corridor without providing the public a clear understanding of the cumulative impacts on traffic, greenhouse gases ("GHG"), and vehicle miles traveled ("VMT") for all of these proposals.

06-3 As you are aware, the proposed Newland Sierra Project's cumulative impacts analysis shows Level of Service ("LOS") F on over 25 miles of the I-15 freeway from Escondido to the Riverside County line at that project's build out. Therefore, it is important that data for additional traffic from the PSRs – most of which are located near the I-15 corridor in North County – be available to the public for review. As noted in the attached memorandum from STC Traffic, Inc., the DSEIR does not provide any information on the impacts of the PSRs on the I-15 freeway and other major thoroughfares in the region. (See Attachment A.) Further, the DSEIR

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does not provide sufficient information to evaluate the traffic patterns and regional distribution of trips associated with the PSRs.

06-4
06-5
Although the PSR projects considered individually may not have a significant impact on State and regional thoroughfares, the cumulative impact of the 35,557 trips being generated by the PSRs must be taken into consideration as the County considers multiple proposals for significant unplanned development along the I-15 corridor. Full disclosure of these cumulative impacts—for traffic, GHG emissions, and VMT—is especially pressing when taken together with the other large General Plan Amendment proposals, like Newland Sierra, that are currently in process. Moreover, understanding the full scope of impacts from unplanned development proposals is extremely important given that SANDAG does not plan for any transportation infrastructure improvements to the I-15 corridor north of Escondido until at least 2050. Given SANDAG's current funding projection shortfalls, even such far distant future improvements may be in jeopardy.

06-6
In addition, the PSRs' GHG mitigation plan incorporates the flaws from Mitigation Measure GHG-1 from County's proposed Climate Action Plan that allows General Plan Amendment projects to rely solely on the purchase of carbon offset credits rather than reducing local VMT. This approach to GHG mitigation allows sprawl development projects to clog our local roadways while paying to offset GHG emissions on other continents. Based on the extensive unplanned development the County is currently processing along rural portions of the I-15 corridor in inland North County, drivers relying on I-15 and surrounding thoroughfares will likely be the first to feel the effects of the County's sprawl-facilitating policy changes. It is imperative, therefore, that the County provided full data about the scope of the traffic impacts in this region, including on I-15.

06-7
We ask that you provide the missing information noted in the attached memorandum from STC Traffic, Inc., so that the cumulative impacts to the I-15 and region can be fully understood. Thank you for your attention to this matter

Sincerely,

Andrew D. Yancey

Andrew D. Yancey
of LATHAM & WATKINS LLP

cc (email):

County Board of Supervisors
County Planning Commission
Kathy Van Ness, Golden Door
Twin Oaks Valley Community Planning Group
Bonsall Community Planning Group
Hidden Meadows Community Planning Group

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Valley Center Community Planning Group
Darin Neufeld, County of San Diego
Mark Slovick, County of San Diego
Ashley Smith, County of San Diego
William Witt, County Counsel
Claudia Silva, County Counsel
Dan Silver, Endangered Habitats League
Stephanie Saathoff, Clay Company
Denise Price, Clay Company
Christopher W. Garrett, Latham & Watkins

Attachment A

February 8, 2018



Latham & Watkins

Attention: Andrew Yancey
12670 High Bluff Drive
San Diego, CA 92130

Subject: Traffic and Transportation Comments
County of San Diego Property Specific Requests (PSR) General Plan Amendment & Rezone SEIR

Dear Andrew:

STC Traffic, Inc. has reviewed the following documents related to the County of San Diego Property Specific Requests (PSR) General Plan Amendment & Rezone:

- Chapter 1.0 Project Description, Location & Environmental Setting (County of San Diego, SEIR)
- Section 2.15 Transportation & Traffic (County of San Diego, SEIR)
- Transportation Impact Assessment, Final Report (Chen Ryan, September 2016)

In reviewing these documents, it is clear that collectively the proposed land use changes in the PSR will add 35,557 new vehicular trips to the roadway network. The Transportation Impact Assessment states that the trips associated with the PSR were distributed on the roadway network using the SANDAG Series 12 model, since the General Plan Model (Series 10) cannot be used for analysis. To determine the future forecast volumes for the Horizon Year condition, the net increase in trips associated with the proposed project in addition to trips associated with the 2014 General Plan Amendment and the County of San Diego General Plan Amendments in process were added to the Series 10 model volumes. This was done by calculating the net change in trips between the baseline Series 12 Model and each of the three following scenarios:

- Series 12 with GPA 2014
- Series 12 with GPA In Process
- Series 12 with PSR

The net increase in daily traffic volume for each of these scenarios was added to the Series 10 model volumes to determine both the future roadway segment volume and the net increase in daily traffic volume on each roadway segment related to the PSR project.

STC determined that the Transportation Impact Assessment does not provide figures illustrating the distribution and assignment of PSR related trips on the roadway network. STC then aimed to calculate the daily volumes using data provided in the technical appendix for the report. However, the following information is not provided in the Technical Appendix to the Transportation Impact Assessment (Chen Ryan, 2016) that would have allowed STC to conduct this independent assessment:

- Baseline Series 10 volumes in a format consistent with the model data
- Baseline Series 12 volumes (without GPA 2014, GPA in Process or PSR)

As a result, STC was unable to isolate the trips for each of these scenarios to evaluate the total new volumes added to roadways within the County. Therefore, the SEIR does not provide sufficient information to evaluate the traffic patterns and regional distribution of trips associated with the PSRs.

06-14
Although the individual PSR areas may generate low to moderate traffic when considered individually, collectively the regional impact of 35,557 new trips to non-County roadways is not evaluated or clearly described in the Transportation Impact Assessment. The rural nature of the locations where the proposed density increases are considered results in a significant portion of the new trips heading toward the I-15, SR-76, SR-78 and other regional facilities. At minimum, to adequately understand regional traffic volumes for the state and regional routes serving rural north San Diego County, trips to these non-county roadways and daily traffic volume information should be reported and evaluated.

06-15
This information was not disclosed in the Transportation Impact Assessment or clearly provided and easily accessible in the supporting documentation for the Transportation Impact Assessment. Such information is necessary to understand the cumulative traffic impacts in the rural north San Diego County region.

CLOSURE

Should you have any questions regarding the information provided herein, please contact me at (760) 585-4494.

Sincerely,
STC Traffic, Inc.


Dawn L. Wilson, PE TE
Principal Manager

Responses to Letter O6, Golden Door Properties, LLC

- O6-1 This comment provides background about Golden Door Properties, LLC (Golden Door) as a world-class resort, local landowner, farmer, and employer. The comment states that they are interested in impacts of projects in the I-15 corridor and have worked with the County on these issues for several years.

The comment provides introductory remarks and does not comment specifically on the adequacy of the Draft SEIR. No further response is required or necessary.

- O6-2 This comment states that Golden Door has reviewed the Draft SEIR and paid particular attention to the cumulative impacts of the PSR GPA on traffic along I-15 and throughout inland North County. The commenter states that they are not taking a position on any of the PSRs. They are concerned that the County is moving forward with a large number of GPAs in the I-15 corridor without providing a clear understanding of the cumulative impacts on traffic, GHGs, and VMTs for all the PSRs.

This comment does not specifically reference any analyses in the Draft SEIR, but generally suggests that the County has not fully considered the cumulative analyses of traffic and GHG related to the proposed project in the I-15 corridor. Cumulative impacts of GHGs are provided in Section 2.17, Global Climate Change of the Draft SEIR. As discussed in that section, the issue of global climate change is inherently a cumulative issue, and the analysis demonstrates that approval of the PSR GPAs would result in potentially significant impacts that would require mitigation to reduce to levels below significance. In addition, cumulative traffic impacts are considered in Section 2.15.4, and impacts on area roadways related to level of service standards were determined to be significant and unavoidable.

- O6-3 This comment references the Newland Sierra Project, which is a project in process with Planning & Development Services, and its cumulative effect on traffic, which would contribute to a LOS F on over 25 miles of the I-15 freeway from Escondido to the Riverside County line at buildout. The comment states that it is important that data for additional traffic from the PSRs be available for public review. The comment references a memorandum, provided as an attachment, from STC Traffic, Inc. (STC). The memorandum states that the Draft SEIR did not provide any information on the impacts of the PSRs on the I-15 freeway and other major thoroughfares in the regions and that the Draft SEIR does not provide sufficient information to evaluate traffic patterns and regional distribution of trips associated with the PSRs. The County does not agree with the comment for the reasons below.

This PSR GPA/Rezone proposes changes to the existing General Plan land use designations (and zoning when necessary for consistency) that establish allowable land uses and intensities of development. The purpose of the Draft SEIR is to inform decision makers about the potential impacts that may be associated with the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations assigned. Therefore, the Draft SEIR does not analyze building-specific impacts or efficiencies associated with construction, maintenance, or operation activities because they are still unknown at this time, and analysis of unknown activities would be speculative. The purpose of the program Draft SEIR is to identify potential impacts that could occur during development

project-specific actions within the PSR Analysis Areas. The Draft SEIR intent is to identify where and to what extent impacts would be likely to occur. All subsequent development project-specific proposals would undergo development project-level CEQA analyses where specific impacts associated with proposed development and additional mitigation measures could be identified.

Traffic from the projects listed in the Draft SEIR were evaluated using the same methodology as those utilized in the County of San Diego 2011 General Plan PEIR, and this SEIR tiers off of that PEIR. As there are no development applications or proposals associated with the PSRs GPA/Rezone, it would not be possible to evaluate development project-specific impacts, development project-specific mitigation measures, or TDM measures at this time. Therefore, conservatively under CEQA, significant impacts that require roadway widening, or the construction of new roadways, beyond those identified in the County of San Diego Mobility Element are considered to be significant and unavoidable.

In regards to the GPAs that are currently in process, such as the Lilac Hills Ranch and the Newland Sierra projects, as these projects have not been approved by the County they were not incorporated into the PSRs' project conditions because it is not known if these GPAs will be changed or if they will eventually be approved. However, for informational purposes, an analysis of the current General Plan Buildout Plus PSRs projects plus GPAs in process was conducted. This analysis was provided in Chapter 5 of the proposed project's TIA (see Appendix E of the Draft SEIR) and Section 2.15.4 of the Draft SEIR. The Draft SEIR concluded that the proposed project would result in a significant and unavoidable cumulative impact associated with traffic in excess of adopted County LOS standards. The Draft SEIR identified adopted General Plan policies (LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2), as well as adopted General Plan Program EIR mitigation measures (Tra-1.12, Tra-1.3, Tra-1.4, Tra-1.5, Tra-1.6, and Tra-1.7) to reduce impacts; however, the Draft SEIR concluded impacts would remain significant and unavoidable.

All County of San Diego Mobility Element roadway segments were analyzed as part of this study. A list of all County Mobility Element roadways and the anticipated traffic that the PSR is anticipated to contribute to the roadway is included in Appendices D and E of the proposed project's TIA (see Appendix E of the Draft SEIR).

In regards to freeway analysis, note that this is a Programmatic SEIR, and, as such, it does not review impacts at a project level. Therefore, the individual projects developed within the PSR areas will still be required to complete a development project-level CEQA analysis. Based on each project's size and location, a freeway analysis may be required at the project level. This approach is consistent with the methods and analysis conducted in the County's General Plan PEIR, from which this SEIR tiers. The General Plan PEIR analyzed the SANDAG Regional Transportation Plan (RTP) and found that implementation of the proposed RTP, which is based off the growth projections of population, housing, employment, income and land use would not result in a significant impact to freeway facilities. The RTP identifies long term improvements to the regional freeway network including additional managed lanes to I-15 from Riverside County by 2050. Based on each project's size and location, a freeway analysis

may be required at the project level, and the timing to the improvements included in the RTP will be evaluated for relevancy.

The Draft TIA did not identify impacts to freeway segments and therefore, it did not need to include further analysis. However, in response to this and other comments a Memorandum dated April 9, 2018 describing Freeway Mainline Analysis dated April 9, 2018 has been added to the Draft TIA to document the projected future year freeway mainline operations with implementation of the Proposed Project as Appendix E4. This Memorandum provides additional explanation as to why there would be no significant impacts to the freeway segments.

- O6-4 This comment states that although the PSR projects may not have significant impacts on State and regional thoroughfares when considered individually, the cumulative impacts of 35,557 trips must be taken into consideration as the County considers multiple proposals for significant unplanned development along the I-15 corridor. Full disclosure of cumulative impacts for traffic, GHG, and VMTs is especially important when taken together with the other large GPA proposals, like Newland Sierra, that are currently being processed.

See response to comment O6-2 regarding GHG analyses, and response to comment O6-3 regarding GPAs that are currently in progress.

In regards to a Vehicle Miles Traveled (VMT) analysis, draft amendments to the State CEQA Guidelines that would implement Senate Bill (SB) 743 are currently being reviewed by the State of California Natural Resources Agency, and the County of San Diego has not yet adopted VMT-based CEQA guidelines or thresholds. Thus, from a transportation evaluation perspective, no VMT analysis is required, nor could significant impacts be determined based on this metric at this time.

- O6-5 This comment states that understanding the full scope of impacts from unplanned developments is particularly important because SANDAG does not plan for any transportation infrastructure improvements to the I-15 corridor north of Escondido until 2050.

The County acknowledges this comment and acknowledges that freeway improvements are not in the San Diego Association of Governments (SANDAG) Regional Transportation Plan (RTP) until the Year 2050. However, note that the proposed project would only change the General Plan land use designations and zoning within the Analysis Areas. Future individual projects developed within the PSR areas will still be required to complete a development project-level CEQA analysis prior to their development. The Draft TIA did not identify impacts to freeway segments and therefore, it did not need to include further analysis. Please see the response to comment O6-3 above regarding the addition of Appendix E4 to the SEIR, which provides additional information why there would be no significant impacts to the freeway segments.

- O6-6 This comment states that the GHG mitigation plan incorporates the flaws from Mitigation Measure GHG-1 from the County's proposed CAP, which allows GPA projects to rely solely on the purchase of carbon offset credits rather than reducing local VMTs. The commenter claims that this approach would allow sprawl development to clog local roadways while paying to

offset GHG emissions on other continents. Drivers relying on I-15 and surrounding thoroughfares will be the first to feel the effects of the County's sprawl-facilitating policy changes; therefore, it is imperative for the County to provide full data about the scope of the traffic impacts on the region, including on I-15.

As discussed in Section 2.17.5 of the Draft SEIR, Mitigation Measure M-GHG-1 from the CAP's Draft SEIR constitutes only a small portion of the mitigation identified to reduce GHG impacts. The Draft SEIR outlines 18 more mitigation measures as well as several General Plan policies that include measures to reduce VMTs (specifically Mitigation Measure CC-1.15). Please refer to response to comment O3-113, O3-125, and O3-130.

As noted in response to comment O6-3, the PSR GPA proposes changes to the existing General Plan land use designations (and zoning when necessary for consistency) that establish allowable land uses and intensities of development. The purpose of the Draft SEIR is to inform decision makers about the potential impacts that may be associated with the maximum potential development on a programmatic scale according to the intensities allowed by the land use designations proposed. Therefore, the Draft SEIR does not analyze building-specific impacts or efficiencies associated with construction, maintenance, or operation activities because they are still unknown at this time, and analysis of unknown activities would be speculative. The Draft SEIR's intent is to identify where and to what extent impacts would be likely to occur. All subsequent project-specific proposals would undergo project-level CEQA analyses where specific impacts and mitigation measures could be identified.

The TIA (provided as Appendix E of the Draft SEIR) evaluated the project's effects from the PSR Analysis Areas on all County of San Diego Mobility Element roadways and State Highway facilities.

The Draft TIA did not identify impacts to freeway segments and therefore, it did not need to include further analysis. Please see the response to comment O6-3 above regarding the addition of Appendix E4 to the SEIR, which provides additional information why there would be no significant impacts to the freeway segments.

- O6-7 This comment asks that the County provide the missing information noted in the attached memorandum from STC so that cumulative impacts on the I-15 region can be fully understood.

The Draft TIA did not identify impacts to freeway segments and therefore, it did not need to include further analysis. Please see the response to comment O6-3 above regarding the addition of Appendix E4 to the SEIR, which provides additional information why there would be no significant impacts to the freeway segments. Please also see response to comments O6-8 through O6-15 below.

- O6-8 This comment states that STC has reviewed the following sections of the Draft SEIR: Chapter 1, Project Description, Location, and Environmental Setting; Section 2.15, Transportation and Traffic; and Transportation Impact Analysis (TIA), Final Report, prepared by Chen Ryan, September 2016.

This comment provides introductory remarks and does not provide a comment specific to any of the analyses in the Draft SEIR. No further response is required.

- O6-9 This comment states that the proposed PSR GPA would add 35,557 new vehicular trips to the roadway network and that the TIA states that trips associated with the PSR were distributed on the roadway network using the SANDAG Series 12 model, since the General Plan Model (Series 10) cannot be used for the analysis.

This comment correctly cites Table 2.15-4 of the Draft SEIR, which provides trip generation estimates for the proposed PSR Analysis Areas. In addition, as discussed in Sections 2.15.2 and 2.15.3, a hybrid of the Series 10 General Plan models and the Series 12 model was used in order to be consistent with the General Plan.

- O6-10 The comment summarizes the approach used to determine future forecast volumes for the Horizon Year condition.

This comment correctly summarizes the approach used to determine future forecast volumes. The comment does not provide a specific comment on the analyses of the Draft SEIR. No further response is required.

- O6-11 The comment notes that the net increase in daily traffic volumes for each of the scenarios described in comment O6-10 was added to the Series 10 model volumes to determine both the future roadway segment volume and net increase in daily traffic volume on each roadway segment related to the PSR project.

This comment correctly summarizes the approach used to determine roadway segment volumes and net increase in daily traffic. The comment does not provide a specific comment on the analyses of the Draft SEIR. No further response is required.

- O6-12 The comment states that STC determined that the TIA does not provide figures illustrating the distribution of PSR-related trips on the roadway network and that STC attempted to calculate the daily volumes using data provided in the technical appendix for the report. However, the information, that would have allowed STC to conduct an independent assessment, is not provided in the technical appendix to the TIA: Baseline Series 10 volumes in a format consistent with the model data, and Baseline Series 12 volumes (without GPA 2014, GPA in Process or PSR).

The volume calculation sheets, which include the Countywide traffic volumes by roadway segment for the following model runs have been provided as an appendix in the Final TIA:

- Series 10 base mode (from the 2011 General Plan PEIR)
- Series 12 baseline (existing/adopted land uses)
- Series 12 with proposed PSR land uses
- Series 12 with proposed PSR GPA and other GPAs in process

- O6-13 This comment states that, as a result of the missing data (see response to comment O6-12), STC was unable to isolate the trips for each of these scenarios to evaluate the total new volumes added to roadways within the County. Therefore, the Draft SEIR does not provide

sufficient information to evaluate the traffic patterns and regional distribution of trips associated with the PSRs.

Please see the response to comment O-12 above.

- O6-14 This comment states that although individual PSR areas may generate low to moderate traffic when considered individually, collectively, the regional impact of 35,557 new trips on non-County roadways is not evaluated or clearly described in the TIA. The rural nature of the locations where the proposed density increases are considered would result in a significant portion of the new trips heading toward I-15, SR-76, SR-78 and other regional facilities. The comment states that in order to understand regional traffic volumes for the state and regional routes serving rural north San Diego County, trips to these non-County roadways and daily traffic volume information should be reported and evaluated.

As noted in response to comment O6-3, the TIA and Draft SEIR evaluate the project and cumulative effects on all County of San Diego Mobility Element roadways and rely on SANDAG's RTP for mitigation of the freeway.

This approach is consistent with the methods and analysis conducted in the County's 2011 General Plan PEIR, from which this programmatic SEIR tiers. The 2011 PEIR relies on the RTP to address regional freeways. Furthermore, the proposed PSR Analysis Areas either do not generate enough vehicle trips or are not located in the vicinity of each other to cumulatively warrant enough vehicle trips to require a freeway analysis. The Draft TIA did not identify impacts to freeway segments and therefore, it did not need to include further analysis. However, in response to this and other comments additional information has been added to the Draft TIA to provide additional explanation as to why there would be no significant impacts to the freeway segments. Therefore, the programmatic analysis provided in the Draft SEIR remains appropriate and adequate, and no additional analysis is required.

In addition, please note that the Analysis Areas are found in the Village, Semi-Rural, and Rural Lands Regional Categories, with some of the Semi-Rural areas covered in the project exhibiting a more suburban character, with relatively close proximity to jobs and service. The suggestion that all Analysis Areas are in rural areas is not accurate.

- O6-15 The comment states that the above-summarized information (see comment O6-14) was not disclosed in the TIA or clearly provided and easily accessible in supporting documentation for the TIA. Such information is necessary to understand the cumulative traffic impacts in the rural north San Diego County region.

Please see response to O-14 above.