

**OTAY RANCH VILLAGE 14 AND PLANNING AREAS 16/19
PROPOSED PROJECT AMENDMENT**

RESPONSES TO COMMENTS AND TESTIMONY

APRIL 3, 2020 PLANNING COMMISSION HEARING

MAY 2020

Responses to Testimony and Correspondence to the Planning Commission

Planning Commission Hearing of April 3, 2020

The Planning Commission received public testimony and correspondence covering the following issues related to the Otay Ranch Village 14 and Planning Areas 16/19 Proposed Project Amendment:

- Traffic
- Jamul/Dulzura Community Planning Group Recommendation
- Wildfire Evacuation
- Biological Resources
- Greenhouse Gas Emissions
- MSCP Conformance

This document supplements the oral testimony provided by County Staff in response to issues raised during the Planning Commission's April 3, 2020 public hearing on the Proposed Project Amendment to the Approved Otay Ranch Village 14 and Planning Area 16/19 Project. Where references have been made to a response, the response can be found at the County's website: <https://www.sandiegocounty.gov/pds/ceqa/OtayRanchVillage14.html>

1. Planning Commissioner Beck requested clarification on the Proposed Project Amendment's increase in average daily trips (ADT). The ADT figures for the Proposed Project Amendment are calculated in Table 4 of Appendix S to the Final EIR Addendum Checklist. As Staff explained during the public hearing, the Proposed Project Amendment, while increasing residential units by 147 units compared to the Approved Project, would increase traffic by only 195 ADT. This relatively low increase in ADT is attributable to the following differences between the Approved Project and the Proposed Project Amendment:

- The Approved Project included 112 rural estate residential lots in Planning Area 16, each of which would generate 12 trips per day. The Proposed Project Amendment does not include estate residential lots in Planning Area 16. Rather, all units in the Proposed Project Amendment (with the exception of 13 units in Planning Area 19) would be considered traditional single family detached units, which would generate 10 trips per day. This would result in a decrease of 224 ADT under the Proposed Project Amendment.
- The Proposed Project Amendment would include 150 multi-family units within Village 14, each of which would generate 8 trips per day. This represents a reduction compared to the Approved Project, which only included single-family units in Village 14 which generate 10 trips per day.
- Due to the more compact nature and mix of uses under the Proposed Project Amendment, a 12% internal trip capture rate was applied to the gross ADT to account for vehicle trips that would not be anticipated to leave the Project Site. These internal trips would include trips to the proposed parks, school, and commercial village core. This would reduce external trips by 1,767 ADT.

This is consistent with the methodology utilized in the Final EIR to analyze the Land Exchange Alternative (Appendix 4.1-9) and is in accordance with SANDAG's trip reduction for mixed use projects. Note that although the Proposed Project Amendment does result in 195 more ADT,

this increase in daily trips does not cause any new significant impacts or a substantially more severe significant impact beyond those of the Approved Project.

2. Jamul/Dulzura Community Planning Group (JDCPG) made no formal recommendation on the Proposed Project Amendment. However, at the Planning Commission hearing, JDCPG restated its prior recommendation that two conditions be added to the Approved Project: (i) the elimination of sanitary sewer connections in Planning Areas 16 and 19, and (ii) a condition that the project applicant implement off-site road improvements in Jamul. The Board of Supervisors considered JDCPG's recommendation during the June 26, 2019 hearing where the Approved Project was adopted. At that hearing, the Board of Supervisors considered the recommended conditions requested by JDCPG and took no action regarding the conditions. As part of Proposed Project Amendment, Planning Area 16 would be conserved by an open space easement. Accordingly, Planning Area 16 would not be served by sewer, leaving only 13 units in Planning Area 19 with sewer connections. Please refer to Response to Comment Letter O-2, Jamul/Dulzura Community Planning Group in the Final EIR, which addressed JDCPG's specific comments on the Approved Project.
3. Public Comments were received regarding wildfire and the wildfire evacuation plan. Appendix X, Fire Safety Memorandum to the Final EIR Addendum, addresses these issues and clarifies certain points regarding fire ignition, subdivision-specific evacuation planning and execution, the defensibility of modern subdivisions, and temporary refuge strategies. Please refer to Appendix X, including Attachment 1, Proposed Project Amendment Wildland Fire Evacuation Plan, and Appendix J (Fire Protection Plan Technical Memorandum) of the Final EIR Addendum Checklist, as well as the Preserve Edge Plan for the Proposed Project Amendment (Appendix 1 to the Otay Ranch Village 14 and Planning Area 16/19 Specific Plan Amendment), and Section 8.4.9, Wildfire Protection and Evacuation, of the Final EIR and Final EIR - Volume II, Response to Comments.
4. Public Comments were received regarding the Proposed Project Amendment's design and impacts to Quino checkerspot butterfly, golden eagle, and other biological resources, including sensitive plant species. The Proposed Project Amendment would mitigate for potential impacts to Quino checkerspot butterfly, golden eagle, and sensitive plant species. Please refer to Appendix D to the Final EIR Addendum Checklist (Biological Resources Technical Memorandum), Appendix W to the Final EIR Addendum Checklist (Quino Checkerspot Butterfly Conservation Strategy), Attachment 4 – Biological Resources Response Memo, as well as Appendix 2.4-1 of the Final EIR (Otay Ranch Village 14 and Planning Area 16/19 Biological Resources Technical Report), Appendix 4.1-4 of the Final EIR (EIR Land Exchange Alternative Biological Resources Technical Report), Sections 8.4.2 (Golden Eagle) and 8.4.3 (Quino Checkerspot Butterfly) of the Final EIR, as well as Final EIR - Volume II, Response to Comments and the Additional Information on the Otay Ranch Village 14 and Planning Area 16/19 Proposed Project Amendment.
5. Public Comments were received suggesting that the Proposed Project Amendment should have prepared a Supplemental EIR. Please refer to Attachment 1 to the Additional Information on the Proposed Project Amendment. As substantiated therein, an Addendum to the previously certified EIR for Village 14 and Planning Areas 16/19 is the appropriate CEQA compliance document for the Proposed Project Amendment based on the County's review and application of the relevant CEQA provisions.
6. Public Comments were received suggesting that the Proposed Project Amendment is not sufficiently reducing GHG emissions. Please refer to the Additional Information on the

Proposed Project Amendment, pages 1 through 5 for responsive information regarding the suite of on-site strategies developed to reduce emissions, as well as perspective on the relationship of the proposed development to the County's established land use planning framework for the Project Site. Further, with respect to the comment that an alternative that reduced GHG emissions should have been analyzed, the Final EIR determined that impacts to greenhouse gas emissions would be reduced to less than significant, and no significant, unavoidable GHG impact would result; therefore, there is no requirement to analyze an alternative that would reduce GHG emissions. See also Appendix H to the Final EIR Addendum Checklist (GHG Emissions Technical Memorandum), Appendix 2.7-1 of the Final EIR, Appendix 4.1-7 of the Final EIR, as well as Final EIR - Volume II, Response to Comments and the Additional Information on the Otay Ranch Village 14 and Planning Area 16/19 Proposed Project Amendment.

7. Public Comments were received suggesting that the Proposed Project Amendment would exchange MSCP Preserve lands for non-MSCP lands, allowing development on the former. This characterization of the exchange is incorrect. All lands subject to the proposed land exchange fall within the MSCP boundary in areas where Take has been authorized, and none of those lands is designated as Preserve. Specifically, the proposed exchange would provide for development on land currently owned by CDFW that is approved for development in the 2011 County General Plan and designated as hardline development under the County MSCP Subarea Plan. The same is true of the land currently owned by the Applicant. For this reason, the Proposed Project Amendment does not require, and does not seek, a General Plan Amendment for a change in land use. To the contrary, the proposed land exchange would conserve lands currently owned by the Applicant that the MSCP anticipated would be developed. Thus, the proposed land exchange would result in a net increase of over 300 acres to the MSCP Preserve. See Appendix 2.4-1 of the Final EIR (Otay Ranch Village 14 and Planning Area 16/19 Biological Resources Technical Report), Appendix 4.1-4 of the Final EIR (EIR Land Exchange Alternative Biological Resources Technical Report), Sections 8.4.2 (Golden Eagle) and 8.4.3 (Quino Checkerspot Butterfly) of the Final EIR, the Final EIR - Volume II, Response to Comments, as well as the Additional Information on the Otay Ranch Village 14 and Planning Area 16/19 Proposed Project Amendment.
8. Public Comments were received stating that the Proposed Project Amendment would result in worsening traffic impacts on SR-94. As stated in Appendix S to the Final EIR Addendum (Traffic Technical Memorandum), "the Final EIR determined that both the Approved Project and the EIR Land Exchange Alternative would result in a direct significant impact to the Lyons Valley Road & SR-94 intersection," and that "[s]ubsequent to the Final EIR analysis, the intersection was signalized ...and, as such, any impacts to the intersection by the Proposed Project Amendment would be less than significant." The Proposed Project Amendment would not contribute to any other significant impacts on SR-94. See also Final EIR Section 2.9, Transportation, Section 8.4.8, SR-94 Improvements, Appendix 2.9-1 and 4.1-9 of the Final EIR, the Final EIR - Volume II, Response to Comments, as well as the Additional Information on the Otay Ranch Village 14 and Planning Area 16/19 Proposed Project Amendment.