

Letter RO-3 – Southwest Regional Council of Carpenters

RO-3-1 This comment is introductory in nature and provides a summary of the proposed Project. The comment also provides a summary of the issues raised in the remainder of the comment letter, which are addressed in the following responses. Therefore, no further response is provided for this comment.

RO-3-2 The comment states “the DEIR does not include a stable project description.” The commenter states that a “an accurate, stable and finite project description” is necessary for an adequate CEQA analysis. The commenter also states that “the Project description [for this project] is anything but finite or stable.” In response, the comment appears to primarily address the Project Description. The detailed Project Description can be found in Chapter 1 in the 2015 DEIR. The 2015 DEIR Project Description clearly describes and illustrates the nature and intent of each land use for the proposed Project. The 2019 Recirculation Package includes an additional alternative (Alternative H). The project description –is clearly described in the recirculated Chapter 4, Project Alternatives. Both the proposed Project and Alternative H have Tentative Maps and Specific Plan development guidelines which regulate the density, intensity, height, setback, and other development requirements.

RO-3-3 The comment states that Section 2.10, Global Climate Change, of the 2019 Recirculation Package “incorrectly relies on federal and statewide plans and regulations which were not designed to be applied at the project-level.” The comment cites the following as examples: requirements for vehicle manufacturers and oil & gas producers; general statewide GHG reduction goals; and the Cap-and-Trade Program. The comment characterizes this information as “confusing and extraneous.”

In response, Section 2.10.1.2, Regulatory Setting, of Section 2.10 sets forth the federal, state, and local framework of statutes, regulations, policies, plans, and goals of relevance to the EIR’s evaluation of the proposed Project’s GHG emissions and impacts on global climate change. The information is provided to give the County’s decision-making body, and other reviewing agencies and interested individuals, the foundation necessary to understand the regulation of GHG emissions. As for the commenter’s specific examples:

- Discussion of the requirements imposed on vehicle manufacturers and oil and gas producers is relevant because those requirements influence the vehicle emission factors included in CalEEMod, the modeling platform used statewide to estimate GHG emissions from land use development;
- Discussion of general statewide GHG reduction goals is relevant because the issue of global climate change is necessarily a cumulative one, and consideration of statewide goals is important and appropriate when considering the significance of an individual project’s GHG emissions (see CEQA Guidelines Section 15064.4); and
- Discussion of the Cap-and-Trade Program is relevant because the Program is a key component of CARB’s framework to achieve the statewide GHG reduction targets; ~~and because the Program authorizes the use of carbon offsets, which are one component of the Project’s multi-faceted mitigation framework.~~

Of note, the proposed Project’s mitigation framework for the reduction of GHG emissions is independent of the components of the EIR’s regulatory framework discussion referenced in this comment. More specifically, while the regulatory requirements imposed on vehicle manufacturers and oil and gas producers, as well as the Cap-and-Trade Program, are designed to assist California in achieving its statewide GHG reduction targets, the Project’s mitigation framework is tailored to the proposed Project’s land uses, setting and purpose, and incorporates reduction strategies within the jurisdictional control of the County and capabilities of the applicant.

RO-3-4 The comment states that the “recirculated DEIR’s analysis of Project impacts without mitigation is not supported by the evidence and does not meet CEQA’s disclosure requirements.” The comment includes various references to Section 2.10, Global Climate Change, of the 2019 Recirculation Package. The commenter then states the EIR “fails to disclose the threshold it used to determine the significance of Project-related GHG impacts,” and states that the EIR “does not clearly disclose that the Project would have significant impacts prior to mitigation, or the severity of these impacts.” The comment further requests that the County do “everything it can to ensure all significant Project GHG impacts are reduced to the greatest extent feasible.”

In response, the thresholds used by the EIR to evaluate the significance of the Project’s GHG emissions were disclosed: “The significance criteria used in this section to evaluate the proposed Project’s GHG emissions are taken from Section VIII, Greenhouse Gas Emissions, of Appendix G of the CEQA Guidelines.” (See 2019 Recirculation Package, page 2.10-1; see also *id.* at page 2.10-19.) Additionally, the significance of the Project’s GHG emissions—both with and without mitigation—was disclosed in the EIR. For example, as provided on pages 2.10-1 and 2.10-2 of the EIR:

“Without mitigation, the proposed Project’s GHG emissions would result in a potentially significant impact due to the Project’s incremental contribution to the cumulative issues of global climate change. ... However, with implementation of the eight mitigation measures recommended in this section, the proposed Project’s GHG emissions would be reduced to net zero, thereby supporting a determination that the Project would not change the existing environmental setting. Because the proposed Project, with mitigation, would result in no net increase in GHG emissions, the proposed Project would not result in a significant impact to global climate change and would not make a cumulatively considerable contribution to global climate change.”

(See also *id.* at pages 2.10-23, 2.10-27, 2.10-28, 2.10-34, 2.10-35, 2.10-39 [Table 2.10-4, Summary of Project GHG Emissions].) Finally, if adopted by the County Board of Supervisors, the EIR’s mitigation measures and design features would require the proposed Project to reduce GHG emissions to the greatest extent feasible. With implementation of the mitigation measures and Environmental Design Considerations, the proposed Project would reduce, avoid, and offset its GHG emissions to a net zero level.

RO-3-5 The comment states “the Recirculated DEIR’s discussion of the Project’s consistency with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions is incorrect and incomplete,” referring specifically to the proposed Project’s consistency with SB

32 and Executive Order S-3-05. The comment also states that, while the EIR claims that purchase of carbon offsets would result in a “net” balance in Project-related GHG emissions, the Project would contribute to a large increase in GHG emissions in San Diego County. The comment then provides that, in order to be consistent with the statewide GHG reduction goals for 2030 (under SB 32) and 2050 (under Executive Order S-3-05), Project-related GHG reductions must occur within the State of California’s jurisdictional boundaries.

In response, as explained in Section 2.10.3, Cumulative Impact Analysis, of the EIR, “in the context of CEQA, ‘GHG impacts are exclusively cumulative impacts’” (2019 Recirculation Package, page 2.10-27). Neither CEQA Guidelines Section 15126.4(c) nor CARB imposed geographic limits on the use of carbon offsets; see Appendix C-26 (Survey of Locational Performance Standards Used by AB 900 Projects) of the 2019 Recirculation Package, as well as pages 101 through 102 of CARB’s 2017 Scoping Plan and Appendix B thereto (available at <https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>). Please also see Global Response R1: Carbon Offsets, which explains why the use of carbon offsets as a form of mitigation for the reduction of GHG emissions is recognized by CEQA and other expert agencies, according to the state of climate science, and is consistent with the County’s General Plan. With implementation of the proposed Project’s mitigation framework (which incorporates a suite of GHG emissions onsite reduction strategies in conjunction with offsite offsets), the proposed Project would achieve a net zero GHG emissions level and ensure that the proposed Project would not conflict with the State’s attainment of its 2030 and 2050 reduction targets, which themselves do not establish net zero benchmarks or otherwise impose geographic restrictions on emission reduction strategies.

RO-3-6 The comment states that the “EIR’s analysis of Project consistency with applicable plans, policies, and regulations does not clearly explain or provide the plan, policy, or regulatory standards it is analyzing.”²² As an example, the comment refers to General Plan Goals COS-1, COS-17, and COS-19, as well as SANDAG’s RTP/SCS. In response, the titles of the cited General Plan goals are provided on page 2.10-14 of the 2019 Recirculation Package. The consistency of the proposed Project with the General Plan’s GHG-related goals then is addressed on pages 2.10-23 through 2.10-24 of the 2019 Recirculation Package, with more detail and information provided in Appendix E-1 (General Plan Amendment Report) of the 2019 Recirculation Package. Additionally, general introductory information regarding SB 375 and SANDAG’s RTP/SCS is provided on pages 2.10-10 and 2.10-11, and 2.10-13. The consistency of the proposed Project with the RTP/SCS is evaluated on page 2.10-25. The analysis provides sufficient detail to allow for careful consideration of the proposed Project’s impacts.

RO-3-7 The comment states that the “Recirculated DEIR’s GHG cumulative impacts analysis is not supported by the evidence nor does it clearly explain how the County reached its conclusion.” In response, as explained in the 2019 Recirculation Package, Section 2.10, Global Climate Change, global climate change— by definition— is a cumulative issue. This science is recognized by CARB (see the 2017 Scoping Plan), and by OPR and the California Natural Resources Agency (which are responsible for updates to the CEQA Guidelines). For example, CEQA Guidelines Section 15064.4(b) directs lead agencies to focus on a project’s “incremental contribution,” which it notes may be “cumulatively considerable.” While the proposed Project would generate

GHG emissions not currently generated by the existing land use, mitigation measures provided in the 2019 Recirculation Package would reduce potential impacts and would achieve a net zero increase in emissions as a result of the proposed Project; because the proposed Project would not result in a change in the existing environmental condition with implementation of its mitigation framework, the proposed Project would not have a significant environmental impact (2019 Recirculation Package, page 2.10-23). This is because, with mitigation, the proposed Project would not result in a positive, additive incremental increase to the global inventory of GHG emissions. To the extent feasible, mitigation will occur locally or within California.

The comment also states that the EIR has not substantiated how the proposed Project would result in no net increase in GHG emissions. In response, the commenter does not identify any specific deficiencies or flaws in the methodological parameters of the proposed Project's unmitigated and mitigated GHG emissions inventories. However, the commenter is referred to Appendix C-2 of the 2019 Recirculation Package, which contains technical information and evidence regarding the proposed Project's emissions inventory estimates both with and without mitigation. The results of detailed analysis provided in Appendix C-2 are summarized in Table 2.10-4 of the 2019 Recirculation Package.

- RO-3-8** The comment states that the EIR's mitigation measures for the reduction of GHG emissions do not contain "specific, tangible, enforceable requirements."²² The comment offers several examples of mitigation parameters that the commenter believes are not sufficiently defined. The responses are provided below.

Failure to specify what types of traffic calming features must be implemented, and related details.

The utilization of traffic calming is required by mitigation measure M-GCC-1. A description of the required traffic calming parameters is provided on page 5 of Chen Ryan Associates' technical memorandum for the proposed Project's TDM Program, a copy of which is located in Appendix A to Appendix C-2 of the 2019 Recirculation Package. As provided therein:

"Implementation of traffic calming features throughout the project site, as well as along Otay Lakes Road. The measures will be designed to reduce motor vehicle speeds and encourage walking and biking within the project site. Traffic calming features may include, but are not limited to: curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others."

The EIR states that the proposed Project shall be required to demonstrate compliance with this measure through implementation of the CEQA-mandated MMRP; additional details regarding its implementation are provided therein. It also is noted that the proposed Project's Revised Tentative Map illustrates traffic calming features associated with the street sections and intersection improvements that are consistent with and implement the requirements of this component of mitigation measure M-GCC-1. For example, Sheet 4 of the Revised Tentative Map includes the design for a "Typical Intersection Neckdown," which has been identified for 34 possible locations. These intersections include tighter corner radii, curb extensions, and distinctive paving/stripping for crosswalks. Sheet 5 of the Revised Tentative Map identifies the

location of 11 roundabouts at intersections within the site. The Revised Tentative Map also requires the installation of four roundabouts at the Project entries from Otay Lakes Road. In addition, the Specific Plan— Development Plan/Section E— Traffic Calming includes additional measures to be considered in the final design of the internal circulation system. Development is required to proceed in substantial conformance with the Revised Tentative Map under provisions of the Subdivision Map Act. For ease of reference, the Project’s Tentative Map is available on the County’s website (<https://www.sandiegocounty.gov/content/sdc/pds/ceqa/OtayRanchVillage13.html>).

Provision of information to residents regarding transit options.

The comment states that the EIR does not clearly explain how this component of the Project’s TDM Program (see mitigation measure M-GCC-1) will serve to reduce proposed Project emissions. Chen Ryan Associates’ technical memorandum for the proposed Project’s TDM Program, a copy of which is located in Appendix A to Appendix C-2 of the 2019 Recirculation Package , addresses community transit opportunities. Table 1 therein presents the quantification of expected VMT reductions based on technical guidance presented in CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* report. See Response to Comment RO-1-8 for additional information on public transit.

Criteria Identifying the Type of High-Efficiency Lighting

The comment states that high-efficiency lighting is proposed for the proposed Project, but states that the EIR but does not provide any quantifiable criteria of use. In response, mitigation measure M-GCC-2 has been supplemented as follows in the Final EIR (additions shown in underline):

“... the Project shall utilize high-efficiency (light emitting diode [LED] or equivalent) interior lighting in the multi-family residences and non-residential buildings that utilizes 15 percent less energy than otherwise permitted by the 2019 Building Energy Efficiency Standards.”

This mitigation measure is intended to apply to all multi-family residences and non-residential buildings, as it does not provide for any exceptions to the lighting requirement.

Information Regarding the Types of Energy Star Appliances

The commenter is concerned that the EIR does not specify which Energy Star Appliances are to be installed. Mitigation measure M-GCC-3 provides that the “required EnergyStar appliances include clothes washers, dishwashers, fans and refrigerators.”

Preparation of a Zero Net Energy Confirmation Report

The commenter states that the EIR does not include specific criteria or requirement for a Zero Net Energy (ZNE) Report. However, the preparation of a ZNE Report pursuant to mitigation measure M-GCC-4 does not constitute impermissible deferral under CEQA because a defined performance standard is provided. Specifically, the “ZNE Report shall demonstrate that the single-family residential development within the Project site has been designed and shall be

constructed to achieve ZNE, as defined by the CEC, or otherwise achieve an equivalent level of energy efficiency, renewable energy generation, or GHG emissions savings.”²² As reflected by the quoted mitigation text, the ZNE Report is required to comply with the CEC’s definitional parameters for ZNE, which generally require buildings to generate on-site energy that is equal to the amount of energy consumed, or otherwise achieve equivalent metrics.

- RO-3-9** The comment requests that the EIR contain additional mitigation measures for the reduction of construction-related GHG emissions. In response, please see Section 2.2, Air Quality, of the Final EIR, which contains numerous construction-related mitigation measures that are expected to reduce criteria air pollutant, toxic air contaminant, and greenhouse gas emissions. While the benefits of these Air Quality mitigation measures were not quantified in Section 2.10, Global Climate Change, of the 2019 Recirculation Package leading to a more conservative estimate, their implementation is expected to result in GHG reduction co-benefits. As for the comment’s specific recommendations, each is evaluated, in turn, below.

Vehicle Idling Times

CARB has adopted regulations that impose idling limits on in-use, off-road diesel vehicles; see California Code of Regulations, Title 13, Section 2449 et seq. As this is a matter of regulatory compliance, no further action is required.

Energy-Efficient Vehicles and Tools Not Powered by Gas or Diesel

Mitigation measure M-AQ-1a requires the use of electric construction equipment, where feasible. Additionally, M-AQ-1a requires that when gas-powered equipment is used, at a minimum, all off-road, diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 3 emission standards for nonroad diesel engines promulgated by the U.S. Environmental Protection Agency, if such equipment is available in the San Diego region. Construction equipment that meets the Tier 4 emission standards will be integrated into the construction fleet during the later stages of the proposed Project’s construction period (post 2020), if such equipment becomes available in the San Diego region. Further, this mitigation measure requires that all construction equipment shall be outfitted with best available control technology (BACT) devices certified by CARB. A copy of each unit’s BACT documentation shall be provided at the time of mobilization of each applicable unit of equipment.

Use of Carbon-Neutral Materials

The use of carbon-neutral materials has not been recommended as a mitigation measure because the definitional parameters of such materials are not well defined or established, and because the availability of such materials is unknown. The United States Green Building Council (USGBC) is a national leader in promoting sustainable development and construction. USGBC has not identified the specific use of carbon-neutral building materials, rather, they promote sustainable construction and resource efficiency that fits into the larger context of a life-cycle approach to embodied impact reduction. USGBC has established a rating system for new home construction - *LEED v4 – Homes* – which encourages the use of environmentally preferred products.

However, there is no quantification of the benefit to reducing greenhouse gas reductions which may be offset by higher manufacturing and transportation costs.

The County acknowledges, as a matter of standard industry practice, that the embodied GHG emissions in building materials are not estimated for purposes of CEQA analysis. This is because accounting for the embodied emissions would invoke concepts of lifecycle analysis, which is not required by CEQA. (See California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97* (December 2009), pages 71–72 [recognizing that no regulatory definition of “lifecycle” exists and noting that “materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be ‘caused by’ the project under consideration.”].)

Construction Workforce Geographies

The County has determined that, for purposes of CEQA, there is no basis to require that the proposed Project hire a specific percentage of construction workers that live within a specific radius of the Project site. The South County demographic area has an established pool of individuals in the construction trade that both live and work in the region.

With implementation of the mitigation measures recommended in the 2019 Recirculation Package, the proposed Project would not result in a significant impact to global climate change. Therefore, no further mitigation for the reduction of GHG emissions is required.

RO-3-10 The comment states that the proposed Project’s actual (not estimated/projected) GHG emissions must be reduced to net zero, and states that use of a 30-year period in mitigation measure M-GCC-8 is not supported with substantial evidence. The comment requests that the County require the proposed Project purchase offsets within California, and purchase offsets for the projected emissions “with calculations for reasonably foreseeable increases in emissions for the projected life of the Project.”²² In response, it is standard industry practice to evaluate a project’s impacts by reference to its estimated emissions, as the actual emissions are not known at the time of CEQA review. Further, CalEEMod, the modeling platform used statewide to estimate GHG emissions from land use development, is designed to provide reasonably conservative and representative estimates of project emissions. Additionally, please see Global Response R1: Carbon Offsets. As explained therein, substantial evidence: (i) supports mitigation measure M-GCC-8’s use of the 30-year period; (ii) confirms that no absolute geographic mandates are required to effectively reduce GHG emissions; and (iii) shows that Project-related emissions are reasonably expected to decrease (not increase) with time as the regulatory framework and technological advancements progress.

RO-3-11 The comment states that “the Recirculated DEIR alternatives analysis does not sufficiently examine alternatives that would mitigate Project impacts and is not based on accurate data.” The comment further states the proposed Project alternatives analysis does not adequately assess whether alternatives would avoid or substantially lessen significant proposed Project effects because it is based on incorrect or incomplete data. The commenter specifically refers to sensitive

vegetation communities, federally endangered species (San Diego thornmint, San Diego ambrosia, and Otay tarplant), California gnatcatcher, and wildlife habitat. The commenter further states the DEIR fails to properly identify significant impacts and, as a result, fails to properly mitigate significant impacts, which renders the alternatives analysis insufficient.

In response, the proposed Project's impacts on vegetation are considered significant, and mitigation measures are recommended per County requirements as outlined in the Otay Ranch RMP. The impacts to which the commenter refers are either to habitat that is disturbed or developed or is for take authorized areas or for road improvements within Otay Ranch for which no mitigation is required. The impacts to the federally endangered plants (San Diego thornmint, San Diego ambrosia, and Otay tarplant), of which only San Diego thornmint was determined to be present onsite, and mitigation is required in accordance with the RMP2. A Resource Salvage and Restoration Plan is required for impacts to San Diego thornmint and relocation is required. Mitigation is required for impacts to California gnatcatcher if construction activities occur during the breeding season and otherwise take of the gnatcatcher is provided under the MSCP since Alternative H conforms with the boundary of approved development within the MSCP. A portion of the site was identified (Ogden 1992; *Baldwin Otay Ranch Wildlife Corridors Studies: Phase 1 Report*) as a wildlife corridor. This linkage is situated north-south through the eastern portion of the Project site and is identified as the R2 linkage. Alternative H is consistent with the approved Preserve boundary for Village 13 per the MSCP County Subarea Plan, and is therefore consistent with the previous wildlife movement study. While other land use changes have occurred within Otay Ranch, within the vicinity of the Otay Ranch Resort site and the corridors outlined for the Proctor Valley Parcel, no changes in wildlife corridors have occurred. Although landscapes in San Diego County have changed significantly in recent decades, the corridors identified in the Ogden Wildlife Corridor Study (1992) are still viable and currently traverse between large areas of open lands. In addition, to provide additional wildlife movement and reduce roadkill, a mitigation measure is included to provide a wildlife culvert at Otay Lakes Road. All potentially significant impacts are identified in the 2015 DEIR, which include:

- BI-1a–k Potential permanent and temporary impacts to sensitive vegetation communities on-site
- BI-2 Potential permanent impacts to sensitive vegetation communities on City of San Diego Cornerstone Lands
- BI-3 Potential permanent impacts to sensitive vegetation communities on City of Chula Vista lands
- BI-4 Potential permanent and temporary impacts to jurisdictional waters and wetlands on-site
- BI-5 Potential permanent impacts to jurisdictional vernal pools on-site
- BI-6 Potential indirect impacts to jurisdictional waters and vernal pools
- BI-7 Potential permanent impacts to jurisdictional waters and wetlands on Cornerstone Lands
- BI-8 Potential permanent impacts to jurisdictional waters and wetlands on County of San Diego lands
- BI-9 Potential indirect impacts to vegetation communities
- BI-10 Potential permanent impacts to San Diego fairy shrimp
- BI-11 Potential permanent impacts to Quino checkerspot butterfly

- BI-12 Potential permanent impacts to California adolphia
- BI-13 Potential indirect impacts to sensitive plant species
- BI-14 Potential indirect impacts to sensitive wildlife species
- BI-15 Potential direct and indirect impacts to nesting migratory birds
- BI-16 Potential direct and indirect impacts to wildlife movement

While these impacts have been identified as potentially significant, the 2015 EIR also identified appropriate mitigation for each that would reduce impacts to a less than significant level.

RO-3-12 The commenter also states that the DEIR does not provide appropriate, enforceable mitigation for impacts to traffic and transportation impacts, and to cultural resources. The comment further states that the County fails to provide enforceable mitigation for significant and unavoidable impact to traffic and transportation. While the commenter is correct that the mitigation relies upon an agreement with the City of Chula Vista, this agreement was reached as of December 2019, making the mitigation enforceable and therefore reducing the impact to a less than significant level. Refer to RO-3-13 below regarding impacts to cultural resources.

RO-3-13 The commenter asserts that the County does not provide clear, enforceable mitigation for discovery of human remains, nor does it provide enforceable mechanisms to ensure that local Native American tribes dictate the procedure for preservation of human remains that are identified as Native American. In response, mitigation measure M-CR-3 states that if any human burials are encountered, the County will not only consult with Native American representatives to determine the best course of action, but it will also adhere to California Public Resources Code Section 5097.98. This mitigation measure is enforceable and would reduce impacts to a less than significant level. The County has determined that the cultural analysis provided within the 2015 Draft EIR, and the 2019 Recirculation Package, Chapter 4.0, Alternatives, accurately provide a comparison between the alternatives and the proposed Project.

RO-3-14 The commenter states that the 2019 Recirculation Package alternatives analysis does not adequately identify feasible alternatives that lessen adverse impacts, nor does it sufficiently examine whether the alternatives listed would mitigate or avoid proposed Project impacts. The alternatives in the 2019 Recirculation Package would each lessen one or more impacts compared to the proposed Project (with the exception of Alternative B). As shown in Table 4.0-2 of the 2019 Recirculation Package, Chapter 4.0, Alternatives, and identified throughout the chapter, the DEIR adequately analyzes whether each alternative would mitigate or avoid potential impacts in comparison to the proposed Project.

RO-3-15 The comment states that “the Recirculated DEIR does not adopt feasible alternatives that would lessen the Project’s environmental impacts.” The comment then cites case law regarding alternatives. The comment further states that alternatives C, G, and E would have fewer impacts than the Project but no alternative was selected in place of the proposed Project. In response, CEQA requires that consideration and discussion of alternatives to the proposed Project be included in the EIR. The decision-making body shall review and consider the information contained in the final EIR prior to approving the project. The decision-making body is responsible for selecting the proposed Project or an alternative. However, the decision-making body is not required to select the least impactful project, but to evaluate the potential impacts, mitigation,

and Project Objectives to make their determination. The County Board of Supervisors is the decision-making body for the proposed Project.

- RO-3-16** The comment states that the 2019 Recirculation Package fails to adequately examine an alternative site for the Project. The commenter requests the 2019 Recirculation Package be revised to analyze at least one additional project site, so that the public and decision makers have an opportunity to evaluate a sufficient array of alternatives. The commenter quotes a sentence from the 2019 Recirculation Package, Chapter 4.0, Alternatives, that states that “impacts to biological resources, cultural resources, and geology and soils, which are specific to this location” could be lessened if an alternative site was selected. In response, the remainder of this sentence quoted points out that “these impacts were found to be less than significant with mitigation” for the proposed Project. Additionally, as stated in the 2019 Recirculation Package, Chapter 4.0, Alternatives, the proposed Project was created with the vision of the overall Otay SRP in mind, and an alternative location that would meet the Project Objectives of being located within Otay Ranch would not be likely to substantially lessen impacts. As required by CEQA Section 15126.6, the EIR “need not consider every conceivable alternative to a project. Rather... a reasonable range of potentially feasible alternatives.” Section 4.1.2.1 of the 2019 Recirculation Package Chapter 4.0 includes discussion of an alternative location. The 2019 Recirculation Package, Chapter 4.0, Alternatives, includes a reasonable range of alternatives.
- RO-3-17** The comment provides conclusionary statements. The comment requests that the Southwest Carpenters be notified of all CEQA actions and notices of any public hearings concerning the proposed Project. In response, the Southwest Carpenters will be notified of upcoming public hearings, will receive a copy of any notices filed in relation with the proposed Project, and will be added to the project mailing list.