

CHAPTER 8.0 LETTERS OF COMMENT AND RESPONSES

8.1 Introduction

A Draft Environmental Impact Report (Draft EIR) for the proposed Project was prepared and circulated for public review from April 3, 2015 to May 22, 2015. During that time, the County received two Tribal comment letters (T-1 and T-2), six Agency comment letters (A-1 through A-4, A-5 and A-6), 17 Organization comment letters (O-1 through O-17), and two Individual comment letters (I-1 and I-2). The County subsequently received late comment letters from two Agency (A-3 and A-7).

In response to comments received from the circulation of the Draft EIR, recent court decisions on greenhouse gases, and a lack of concurrence from the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (letter to the County dated March 30, 2017), revisions and additions have been made to the environmental analysis, including global climate change (greenhouse gas emissions), and project alternatives. The new Alternative H was introduced to be consistent with the South County MSCP hardline project footprint. Due to these changes, the County recirculated the Global Climate Change Section (previously Section 3.8, now Section 2.10) and Chapter 4.0, Project Alternatives. In addition to these Draft EIR sections, the County also circulated new technical appendices for Alternative H. Public comment on this 2019 Recirculation Package was open between April 11, 2019 through May 28, 2019. During that time, the County received four Agency comment letters (RA-1 through RA-4) and nine Organization comment letters (RO-1 through RO-9). The County subsequently received a late comment letter from one Agency (RA-5).

Due to the volume of comments received, a separate volume has been added to the Final EIR. Within that Volume are “Comment Letters” and “Comment Letter Responses”. A Table of Contents has been included in this Volume to direct the reader to the appropriate comment and/or response. The comments have each been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A-1 contains 32 comments that are numbered A-1-1 through A-1-32.

The County’s responses to each comment on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the State CEQA Guidelines, the County is not required to respond to all comments on the Draft EIR, but only those comments that raise environmental issues regarding the adequacy of the Draft EIR. In accordance with CEQA Guidelines 15088 and 15204, the County has independently evaluated the comments and prepared the attached written responses describing the disposition of any significant environmental issues raised. CEQA does not require the County to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

Rather, CEQA requires the County to provide a good faith, reasoned analysis supported by factual information. To fulfill these requirements, the County’s experts in planning and environmental sciences consulted with and independently reviewed analysis responding to the Draft EIR comments prepared by AECOM and other experts, which include experts in aesthetics, agriculture, air quality, biology, cultural resources, geology and soils, greenhouse gas emissions, hazards and

hazardous materials, hydrology and water quality, land use planning, noise, public services, transportation and traffic, utilities and service systems, energy, and environmental studies, each of whom has years of educational and field experience in these categories of environmental sciences; is familiar with the project and the environmental conditions in the County; and is familiar with the federal, state, and local rules and regulations (including CEQA) applicable to the proposed project. Accordingly, the County staff's final analysis provided in the responses to comments are backed by substantial evidence. Likewise, the County Counsel's Office prepared and/or independently reviewed legal analysis supplementing the responses to the Draft EIR comments.

In the case of specific comments, the County has responded with specific analysis; in the case of a general comment, or a recurring comment, the reader is referred to a series of "Global Responses" where applicable (discussed in Section 8.4). The absence of a specific response to every comment does not violate CEQA if the response would merely repeat other responses. Several of the comment letters repeat issues the County addressed in Global Responses and other written responses as part of the Final EIR. Due to the repetition, the County relies on those other responses addressing the same or similar issues, even if an individual response does not reference other applicable response(s). This is justified by the voluminous comments provided, and by the same or similar issues raised in such comments. For this reason, each reviewer is encouraged to review the Thematic Responses and the other written responses for further responsive information.

8.2 List of Agencies, Organizations, Individuals, and Tribes that Commented on the Draft EIR and 2019 Recirculation Package

Please refer to the Final EIR, Volume X for a comprehensive list of all written comments received during the public comment period.

8.3 Summary of Changes to the Draft EIR and Appendices

In some cases, comments received on the Draft EIR and 2019 Recirculation Package prompted changes to the final version of the document – i.e., the Final EIR. These are shown in strikeout/underline format. The Final EIR also includes informational updates and clarifications. These, too, are shown in strikeout/underline format. Consistent with CEQA Guidelines Section 15088.5(b), these revisions have been made to clarify text for consistency or revise punctuation as appropriate throughout the document, and these revisions do not result in what constitutes new significant information that would require recirculation of the document. In addition to the EIR changes, some of the EIR appendices were revised based on comments received during public review. The EIR sections and Appendices that were changed include:

- Summary
- Section 1.0, Introduction
- Section 2.1, Aesthetics and Visual Resources
- Section 2.2, Air Quality
- Section 2.3, Biology

- [Section 2.4, Cultural Resources](#)
- [Section 2.5, Geology and Soils](#)
- [Section 2.6 Hazards and Hazardous Materials](#)
- [Section 2.7, Noise](#)
- [Section 2.8, Solid Waste](#)
- [Section 2.9, Transportation and Traffic](#)
- [Section 2.10, Global Climate Change](#)
- [Section 3.2, Hydrology and Water Quality](#)
- [Section 3.3, Land Use and Planning](#)
- [Section 3.4, Mineral Resources](#)
- [Section 3.5, Population and Housing](#)
- [Section 3.6, Public Services](#)
- [Section 3.7, Utilities and Service Systems](#)
- [Section 3.8, Energy Use and Conservation](#)
- [Chapter 4.0, Project Alternatives](#)
- [Chapter 5.0, References](#)
- [Chapter 6.0, List of Preparers](#)
- [Chapter 7.0, List of Mitigation Measures and Environmental Considerations](#)
- [Appendix D-3, Biological Resources Technical Report Supplemental Analysis Otay Ranch Resort Village 13 – Alternative H](#)
- [Appendix D-19, Service Availability Letters Supplemental Analysis Otay Ranch Resort Village 13 – Alternative H](#)
- [Appendix D-21, Fire Protection Plan Otay Ranch Resort Village 13 - Alternative H](#)
- [Appendix D-23, Preserve Edge Plan Otay Ranch Resort Village 13 – Alternative H](#)
- [Appendix D-24, Otay Ranch Resort Village 13 Alternative H 1993 Otay Ranch GDP/SRP Program EIR Mitigation Monitoring Program Compliance](#)

8.4 Global Responses to Comments

[Similar comments were received on several topics. In response, Global Responses were prepared to comprehensively address these comments for both the 2015 Response to Comments and 2019](#)

Response to Comments from Recirculation. The individual responses refer to the following Global Responses, which include:

- Global Response 1: RMP Phase 2
- Global Response 2: Golden Eagle
- Global Response 3: Travel Time and Standard Methodology
- Global Response 4: Fire Service Provision
- Global Response 5: Determining Adequacy of Response/NFPA 1710
- Global Response R1: Carbon Offsets
- Global Response R2: County of San Diego Climate Action Plan
- Global Response R3: Structure Vulnerability and Ignition
- Global Response R4: Quino Checkerspot Butterfly

These Global Responses are included in the Volume of individual Response to Comments for easy referral by the reader when reviewing the Response to Comments.