

Ldn Consulting, Inc.

42428 Chisolm Trail, Murrieta CA 92562
www.ldnconsulting.net

phone 760-473-1253
fax 760-689-4943

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Lilac Hills Ranch
Attn: Jon Rilling
11452 El Camino Real, Ste. 120
San Diego CA, 92130

**RE: MEMORANDUM – Lilac Hills Ranch Development (General Plan Amendment – 12-001;
Specific Plan – 12-001), County of San Diego, CA**

This letter serves to augment the EIR's evaluation of potential environmental impacts associated with the proposed Project's emissions of greenhouse gases (GHG) in response to the recently updated existing traffic volume counts completed by LLG, 2018 (TIS Addendum, 2018). This letter explains how the updated traffic counts relate to the information provided in the GHG analysis prepared by Ldn Consulting, 2018 ("Global Climate Change Analysis").

The Global Climate Change Analysis uses the California Emissions Estimator Model (CalEEMod), Version 2016.3.1, to estimate project emissions. Of relevance to this letter, CalEEMod calculates the GHG emissions associated with on-road mobile sources, such as the light-duty vehicles and trucks that would be driven by the project's residents, workers, and customers, as well as delivery vehicles visiting the land use types in the project. The emissions associated with on-road mobile sources calculated in CalEEMod are based upon a combination of default model parameters (e.g., fleet mix) and project-specific information, such as the mix of proposed land uses and the trip generation rates and trip lengths associated with such land uses. Project-specific GHG emissions are estimated based on an increase in mobile source activity from baseline conditions. In this case, the project's analysis does not account for existing, on-site uses (which consist of several homes and agricultural activities) to be conservative. Instead, project-related GHG emissions are treated as an increase from zero.

Because the project-related GHG emissions are not based on existing traffic counts, the information regarding existing traffic counts presented in the 2018 TIS Addendum is not relevant to the assessment of the significance of the project's GHG emissions. Therefore, changes in the existing traffic volumes reported by LLG have no effect on the modeling or the project's related GHG emissions.

In conclusion, LLG's updates to the existing traffic volume counts do not change the findings in the Global Climate Change Analysis.

Sincerely,



Jeremy Loudon, Principal