Letter C1d

RDEIR Public Comment to the Proposed Accretive Lilac Hills Ranch [LHR] General Plan Amendment and Specific Plan PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP)

Valley Center Community Planning Group Comments:

2.1 Visual Resources

RDEIR Subchapter 2.1 Visual Resources the County of San Diego factually understates Significant Impacts to Visual Resources in the following instances.

Comment 2.1.2.1- Issue 1: THE COUNTY HAS NOT FOLLOWED ITS OWN GUIDELINES FOR DETERMINING SIGNIFICANCE OF SCENIC VISTAS IN AN UNBIASED MANNER
The County's guidelines are below:

"According to the County's Guidelines for Determining Significance – Visual Resources (County of San Diego 2007a), a significant impact would occur if the project would **substantially obstruct, interrupt, or detract** from a valued focal and/or panoramic vista **from a public road**, a trail within an adopted County or State trail system, a scenic vista or highway, or a recreational area."

The County asserts that the I-15 view-scape will not change. This is true and irrelevant.

West Lilac Road and Circle R Drive are Public Roads.
The current view-scape of the West Lilac/Circle R Drive loop to Highway 395 is very similar to the noted Scenic State Highways. The Project will forever obstruct, interrupt and detract from the panoramic vista viewed from West Lilac Public Road. There will be significant impact to the West Lilac view-scape for which there is no Mitigation feasible.
There is Significant Impact for Issue 1 – Scenic Vista that is Unavoidable.

C1d-1

Comment 2.1.2.3 – Issue 3 Visual Character or Quality - THE COUNTY HAS NOT FOLLOWED ITS OWN GUIDELINES FOR DETERMINING SIGNIFICANCE OF VISUAL CHARACTER IN AN UNBIASED MANNER

The County's guidelines for Visual Character or Quality are below:
"*According to the County's Guidelines for Determining Significance – Visual Resources (County of San Diego 2007a), a significant impact would also occur if the project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with* ***important visual elements or the quality*** *of the area (such as theme, style, setbacks,* ***density****, size, massing, coverage, scale, color, architecture, building materials, etc.).*"

The County asserts that the I-15 view-scape will not change. This is true and irrelevant.
The dense urban features of the Project in stark contrast to the rural lands that surround the Project is a Significant Impact to West Lilac and Circle R Drive Public Road views.
There is Significant Impact for Issue 3 – Visual Character or Quality that is Unavoidable.

C1d-2

C1d-1 This comment pertains to the significance criteria utilized in the visual analysis of the project. To clarify, the 2007 visual resources County guidelines state:

The following significance guidelines should guide the evaluation of whether a significant impact to visual resources will occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect:

…

3. The project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:

- *a public road,*
- *a trail within an adopted County or State trail system,*
- *a scenic vista or highway, or*
- *a recreational area.*

As indicated in FEIR subchapter 2.1, I-15 is a County Scenic Highway and, therefore, it is important to address the project's impacts to views from I-15.

As detailed in FEIR subchapter 2.1, a viewshed analysis (FEIR Figure 2.1 2) was completed to determine the impacts of the project upon the visual aesthetics from existing roadways. As shown, the site is not visible from Circle R Drive but is visible from West Lilac Road where it is adjacent to the site only for approximately 0.5 mile. This portion of West Lilac Road is not a designated scenic route or panoramic vista. The views from this short segment of West Lilac Road adjacent to the site are generally limited to the local area, and consist of the roadway and immediate adjacent landscaping, orchards, disturbed native vegetation, driveways, and structures. As stated in the FEIR subchapter 2.1.2.1, the project impact to scenic vistas would be less than significant and no mitigation would be required.

C1d-2 To clarify, the 2007 visual resources County guidelines state:

"The following significance guidelines should guide the evaluation of whether a significant impact to visual resources will occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect:

1. The project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines."

Subchapter 2.1.2.3 analyzes key viewpoints considered in the FEIR analysis related to the project viewshed. I-15 is a County Scenic Highway, and as such was considered a key viewpoint and addressed accordingly in the FEIR subchapter 2.1.2.3.

As previously discussed in response to comment I51c-3, the site is not significantly visible from Circle R drive and views of the site from West Lilac Road are limited to the approximately 0.5 mile segment along the northern project boundary. The FEIR subchapter 2.1.2.3 identifies that the project would result in a significant visual character impact along that portion of West Lilac Road due to the changes brought about to the visual environment related to dominance, scale, diversity, and continuity. As this comment suggests, this impact is identified as significant and unavoidable in FEIR subchapter 2.1.6 in part because Fire Code regulations prevent more effective use of mature foliage to mitigate the visual impact in this location.

LETTER

RESPONSE

2.3 Transportation/Traffic

Subject: RDEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), RDEIR Chapter 2.3 Traffic; Traffic Impact Study of the proposed Lilac Hills Ranch (LHR) Project

We find the RDEIR Chapter 2.3 text to read as if it is an advocacy document for the Applicant. There are many general statements that are unsupported by facts and indicate to the Community that the County has not performed adequate independent critical review of Traffic and Traffic related Safety Issues. C1d-3

General Comments

Overview
Traffic - Chapter 2.3 of the RDEIR and the Traffic Impact Study have failed to disclose significant impacts and have failed to mitigate previously identified impacts. C1d-4

This project requires in excess of 30 acts of taking of Private Land to construct off-site road improvements. The County has not provided disclosure of these Impacts. C1d-5

Additionally, the County has identified significant cumulative impacts and has claimed that mitigation is infeasible. For nine impacts, CALTRANS does not agree with the County's Infeasibility assessment. We request the County to provide comprehensive and complete justification for the County's "Infeasibility" assessment as is enumerated below. C1d-6

Project Baseline

The County has not presented a Project for review. The County has presented a listing of incomplete Alternatives that cannot be reasonably assessed for Environmental Impact and Mitigations. C1d-7

The County of San Diego's Baseline condition for the Traffic Study should be in full compliance with the General Plan, all applicable Road Standards, and in consonance with current Agreements with other Governmental Agencies.

The Traffic Impact study should be base-lined as follows: C1d-8

- In compliance with the General Plan
- No Exceptions to Road Design Standards
- Without an additional on-site School, which is the agreement with the Bonsall and Valley Center/Pauma School Districts.

The County has used the as the baseline the Applicant's Specific Plan proposal (requiring 10 exceptions to Road Standards), with incremental partial compliance with laws and regulations analyzed as **Alternatives**. The Alternatives lack depth, linkage and integration with the Project's Impacts. The Alternatives do not fully capture even most of the possible cumulative impacts of the likely permutations of Phase implementation. C1d-9

C1d-3 The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

C1d-4 The comment is an introduction to comments that follow and addresses general subject areas, which received extensive analysis in the FEIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. FEIR Table 2.3-23 and Table 2.3-24, as well as Table 10.5 of the Lilac Hills Ranch Traffic Impact Study (June 3, 2014) [FEIR Appendix E] (TIS) disclose all applicable significant traffic-related impacts, as identified per the County of San Diego - Guidelines for Determining Significance and Report Format and Content Requirements - Transportation and Traffic; June 20, 2012. The comment will be included as part of the record and made available to the decision makers prior to a decision on the proposed project.

C1d-5 The comment is an introduction to specific comments that follow and are responded to in detail in responses C1d-10 and C1d-11, below.

C1d-6 The comment is an introduction to specific comments that follow. Please see the response to comment C1d-21, below.

C1d-7 The comment addresses general subject areas that received extensive analysis in the FEIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the project. However, the FEIR addresses the potential impacts of the proposed project, as described in FEIR Chapter 1.0, Project Description, Location and Environmental Setting. Analysis of alternatives to the proposed project is provided in FEIR Chapter 4.0, Project Alternatives.

C1d-8 The baseline condition utilized in the TIS to assess project impacts is existing, on the ground conditions, consistent with County and CEQA requirements. Please see TIS Section 5.0, Existing Plus Project Conditions, and Section 6.0, Cumulative Traffic Conditions.

C1d-9 The comment is a continuation of comment C1d-8 and is incorrect. As noted in response to comment C1d-8, project impacts were assessed against existing conditions.

Specific Comments

1). The need to take land for Off-Site Improvements The Project needs in excess of 30 acts of Eminent Domain to construct the Project's proposed road improvements to the Reduced Standards that the Project requires. Further taking of private land is necessary to build the Project in compliance with County of San Diego Road Standards. C1d-10

The County needs to disclose the following information so that impacts are identified and required Mitigation can be implemented.

Please provide evidence that there are adequate Project rights for construction of these improvements, including temporary encroachment permissions for construction that enable continued use of the road by Residents during construction.

A). Required Disclosure of Relevant Information regarding legal rights for construction of Off Site Improvements as well as how the Applicant intends to gain legal rights

In the RDEIR, the County has not provided adequate disclosure regarding off-site impacts of the Project and its Alternatives to surrounding property owners.

This information is necessary to demonstrate Project Feasibility that the Project can ever be legally built.

For the Project and each of its Alternatives, provide the following information regarding off-site improvements for which Accretive Investments currently holds less than full legal right of way. For each impacted parcel, indicate what the Applicant has done to attempt to secure legal rights. Disclose how the Applicant or the County intends to secure the necessary legal rights for these parcels: C1d-11

Parcel Number	Property Owner	Sq. ft. Right of Way required	sq.ft.Slope Easement	Total sq. ft. Encroachment

i) West Lilac Road

Scenario 1 – Construction of West Lilac Road from Old Hwy 395 to proposed new Road 3b to 2.2 C Road Standards as is the General Plan Baseline. The County for the full route of this Alternative has provided no information on offsite improvements, which is the present General Plan Mobility Element baseline. C1d-12

Scenario 2 a – As per "Right of Way Analysis W. Lilac Rd Alt 1 2.2C/2.2F dated Oct 31, 2013 **with additional land necessary to incorporate Reid Middleton Roundabout design modification recommendations identified.** The Oct 31, 2013 study found that 22 parcels were impacted for a total of 4.3 acres. The Study did not quantify the additional parcels impacted by Roundabout redesigns recommended by Reid Middleton. Please include a current and accurate disclosure of the parcels as impacted by Roundabout redesign. C1d-13

Scenario 2 b – As per "Right of Way Analysis W. Lilac Rd Alt 1 2.2 C dated Oct 31, 2013 **with additional land necessary to incorporate Reid Middleton Roundabout design modification recommendations identified.** The Oct 31, 2013 study found that 22 parcels were impacted for a total of 5.6 acres. The Study did not quantify the additional parcels C1d-14

C1d-10 The project does not propose reduced standards as the comment states, but rather the project proposes modifications to design standards as allowed under the County's adopted Public Road Standards. To the extent additional property is required to implement the County's standards, such property will be acquired consistent with applicable law.

C1d-11 The FEIR adequately analyzes the potential environmental impacts associated with construction of the off-site physical improvements as required under CEQA. With respect to related property rights, please see Global Response: Off-Site Improvements – Environmental and Easement Analysis Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties. Please also see Global Responses, Easements (Mountain Ridge Road and Covey Lane) and Off-Site Improvements – Environmental Analysis and Easement Summary Table for additional information responsive to this comment.

C1d-12 Proposed improvements to West Lilac Road are discussed in their entirety in Chapter 1.0 of the FEIR. Specifically, the project proposes improvements to West Lilac Road from Old Highway 395 to Road 3. Details of the proposed roads are included in the table referenced above.

Impacts associated with these improvements have been considered throughout the FEIR, primarily under off-site improvements, and included in the cumulative impacts section of each subject as well. A figurative illustration of the improvements is included on Table 2.5-2a of the FEIR. Please also see response to comment C1d-11 above and related reference materials for additional information responsive to this comment.

C1d-13 The commenter accurately represents that a redesign of the roundabouts resulted from the Reid Middleton Roundabout Study. This is the design reflected in the project's current description. All impacts are located within the original footprints of the roundabouts. The roundabouts do impact off-site areas; however, these are within existing IODs with both slope and drainage rights. No new impacts have occurred based on the roundabout redesign. Please also see response to comment C1d-11 above and related reference materials for additional information responsive to this comment.

impacted by Roundabout redesigns recommended by Reid Middleton. Please include a current and accurate disclosure of the parcels as impacted by Roundabout redesign. C1d-14, cont.

Scenario 3 – Impact of improvement from non-compliant 2.2F to 2.2E configuration to improve horizontal curves and provide bicycle lanes in each direction and 8-foot shoulders for West Lilac Road from Easterly boundary of Subdivision (currently near existing Lilac Walk private road intersection) to Covey Lane. This scenario is discussed further in section 2). Direct Impacts to West Lilac Road section of this section. C1d-15

ii). Covey Lane/West Lilac Intersection

Scenario 1 – Impact of construction to Applicant's proposed design **including Sight Distance Clearance and turn tapers. Please carefully analyze the need for Additional Slope Easements beyond those granted in IODs. How is the Project going to construct the improvements without further encroachment beyond easement boundaries? How is the road going to remain in service during construction for existing residents?** C1d-16

iii). Mountain Ridge Private Road including Mountain Ridge/Circle R Intersection

Scenario 1 – Impact of improvement to Applicant's proposed design **including Sight Distance Clearance and turn tapers. . How is the Project going to construct the improvements without further encroachment beyond easement boundaries? How is the road going to remain in service during construction for existing residents?**

Scenario 2 – Impact of improvement of Mountain Ridge Private Road to 30 Mph Private Road Design Speed Standards **including Sight Distance Clearance and turn tapers. . How is the Project going to construct the improvements without further encroachment beyond easement boundaries? How is the road going to remain in service during construction for existing residents?**

Scenario 3 – Impact of construction of Mountain Ridge Private Road to Public Road Design Standards **including Sight Distance Clearance and turn tapers. . How is the Project going to construct the improvements without further encroachment beyond easement boundaries? How is the road going to remain in service during construction for existing residents?** C1d-17

iv). Rodriguez private road. Please further enumerate the all improvements proposed for Rodriguez Road as represented in Master Preliminary Grading Plan TM 5571 RPL 4 Sheet 7 of 12. Provide the legal basis of rights to construct the improvements to Rodriguez Road. Provide a copy for Public Review of document 2013-0021800 Rec. 1-11-2013. . **How is the Project going to construct the improvements without further encroachment beyond easement boundaries? How is the road going to remain in service during construction for existing residents?** C1d-18

2). Cumulative Significant Impact Mitigation summarily dismissed as "Infeasible" when in fact Mitigation is Feasible.

The County has identified the following Cumulative Significant Impacts and Mitigation: C1d-19

C1d-14 The commenter is referencing a second alignment study associated with the Reid Middleton Roundabout Study. This design was not selected to be included in the project and is not relevant for inclusion in the project's CEQA analysis. See response to comment C1d-13. Please also see response to comment C1d-11 above and related reference materials for additional information responsive to this comment.

C1d-15 Please see response to comment C1d-14, above.

C1d-16 Please see Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and Off-site Improvements - Environmental Analysis and Easement Summary Table, for additional information responsive to this comment. With respect to the roads remaining available to residents during construction, as detailed in FEIR subchapter 2.3, and Table 1-3, a traffic control plan would be completed implemented to manage construction traffic and ensure impacts are less than significant.

C1d-17 Mountain Ridge Road is currently a two-lane private road that provides limited access from the project site to the County's public road system via Circle R Drive. Mountain Ridge Road is not improved to its designated road design standard and is actually substandard with respect to its current ability to support actual road speeds of its users. As described in Chapter 1.0 of the FEIR and shown in Table 1-2, the project proposes to design Mountain Ridge Road as a wider, slower roadway. As proposed, the project would reduce dangerous vertical curves along the roadway. Additionally, the project proposes to remove the taper requirement at the intersection of Circle R Drive in order to provide a smoother and less impactive transition onto this road. As shown on FEIR Table 2.5-2 and illustrated in Figure 2.5-2b, no off-site impacts would occur to existing biology as a result of the road design, Additionally, no sight distance issue exists as the County recently cleared vegetation at this location. With respect to the widening of Mountain Ridge Road to Public Road standards, all impacts are discussed in subchapter 4.9 of the FEIR. Additional biological resources affected by the road widening are identified and mitigation is proposed (see subchapter 4.9.2.5). Please also see response to comment C1d-11 above and

TABLE 2.3-24
CUMULATIVE TRAFFIC IMPACTS AND MITIGATION SUMMARY

Impact	Mitigation
Impact TR-10: W. Lilac Road, Old Highway 395 and Main Street	**M-TR-4** and **M-TR-6** (see above)
Impact TR-11: Camino Del Rey, Old River Road and West Lilac Road	**M-TR-8:** Prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant, or its designee, shall pay all applicable fees to the TIF Program, which the County should be updates to include the changes to the Land Use and Mobility Elements proposed by the project.
Impact TR-12: Gopher Canyon Road, E. Vista Way to Little Gopher Canyon Road	While improvement of this segment to a 4.1B classification would mitigate the project impact, such mitigation is infeasible.
Impact TR-13: Gopher Canyon Road, Little Gopher Canyon Road to I-15 SB Ramps	**M-TR-8** (see above)
Impact TR-14: E. Vista Way between SR-76 and Gopher Canyon Road	**M-TR-8** (see above)
Impact TR-15: E. Vista Way between Gopher Canyon Road and Osborne Street	**M-TR-8** (see above)
Impact TR-16: Pankey Road between Pala Mesa Drive and SR-76	While improvement of this segment to a 4.2B classification would mitigate the project impact, such mitigation is infeasible.
Impact TR-17: Lilac Road between Old Castle Road and Anthony Road	**M-TR-9**: Prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee shall construct intermittent turn lanes at all major access locations along Lilac Road from Old Castle Road to Anthony Road, including the segment between Robles Lane and Cumbres Road, and the intersection of Sierra Rojo Road and Lilac Road.

2.3-68

C1d-19, cont.

C1d-17 (cont.)

related reference materials for additional information responsive to this comment. With respect to the roads remaining available to residents during construction, as detailed in FEIR subchapter 2.3, and Table 1-3, a traffic control plan would be completed implemented to manage construction traffic and ensure impacts are less than significant.

C1d-18 Rodriquez Road is an existing 40-foot-wide private easement road that would require surface improvements necessary to accommodate the secondary emergency access requirement for the Phases 4 and 5. Specifically, Rodriguez Road would be improved from its current state to a 28-foot graded/24-foot paved roadway. The improvements needed by the project have been previously approved under the Sukup TM. Please also see response to comment C1d-11 above and related reference materials for additional information responsive to this comment. With respect to the roads remaining available to residents during construction, ss detailed in FEIR subchapter 2.3, and Table 1-3, a traffic control plan would be completed implemented to manage construction traffic and ensure impacts are less than significant.

C1d-19 The comment is an introduction to comments that follow. No further response is required.

TABLE 2.3-24
CUMULATIVE TRAFFIC IMPACTS AND MITIGATION SUMMARY
(continued)

Impact	Mitigation
Impact TR-18: Cole Grade Road, between Fruitvale Road and Valley Center Road	M-TR-8 (see above)
Impact TR-19: E. Vista Way/Gopher Canyon Road	M-TR-8 (see above)
Impact TR-20: SR-76/Old Highway 395 (Caltrans)	While intersection improvements would reduce these project impacts to below a level of significance, such mitigation is infeasible because these intersections are under Caltrans jurisdiction.-
Impact TR-21: SR-76/Pankey Road (Caltrans)	
Impact TR-22: Old Highway 395/E. Dulin Road	M-TR-10: Prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee shall construct a traffic signal at the Old Highway 395/East Dulin Road intersection.
Impact TR-23: Old Highway 395/West Lilac Road	M-TR-8 (see above)
Impact TR-24: I-15 SB Ramps/Old Highway 395 (Caltrans)	M-TR-8 (see above)
Impact TR-25: I-15 SB Ramps/Old Highway 395 (Caltrans)	M-TR-8 (see above)
Impact TR-26: Old Highway 395/Circle R Drive	M-TR-5 (see above)
Impact TR-27: I-15 SB Ramps/Gopher Canyon Road (Caltrans)	M-TR-8 (see above)
Impact TR-28: I-15 NB Ramps/Gopher Canyon Road (Caltrans)	M-TR-8 (see above)
Impact TR-29: Miller Road/Valley Center Road	M-TR-11: Prior to issuance of any building permit for new structures within the Lilac Hills Ranch Specific Plan, the applicant or its designee shall construct a traffic signal at the Miller Road/Valley Center Road intersection.
Impact TR-30: I-15 between Riverside County Boundary and Old Highway 395	While there are plans to widen I-15 between Riverside County and SR-78 that would mitigate cumulative I-15 impacts, there is no secured funding for the improvement and there is no mechanism in place to provide contributions to the improvement. Ultimately, mitigation is infeasible because the I-15 is under Caltrans jurisdiction.
Impact TR-31: I-15 between Old Highway 395 and SR-76	
Impact TR-32: I-15 between SR-76 and Old Highway 395	
Impact TR-33: I-15 between Old Highway 395 and Gopher Canyon Road	
Impact TR-34: I-15 between Gopher Canyon Road and Deer Springs Road	
Impact TR-35: I-15 between Deer Springs Road and Centre City Parkway	
Impact TR-36: I-15 between Centre City Parkway and El Norte Parkway	
Impact TR-37: I-15 between El Norte Parkway and SR-78	

C1d-19, cont.

The County has stated that two impacts to County Jurisdiction Roads, TR-12 and TR-16 are infeasible to mitigate. Please discuss at length the County's rationale on why it is not possible for the Applicant to contribute to mitigation of these two impacts. Include complete citation reference to all applicable County, SANDAG, and State (if applicable) regulations and Public Laws that support the County's "Infeasibility" statement. If a Fair Share Payment is proposed as mitigation, provide the calculation methodology and result and cite references to procedure and Public Law the Fair Share methodology is enumerated in.

C1d-20

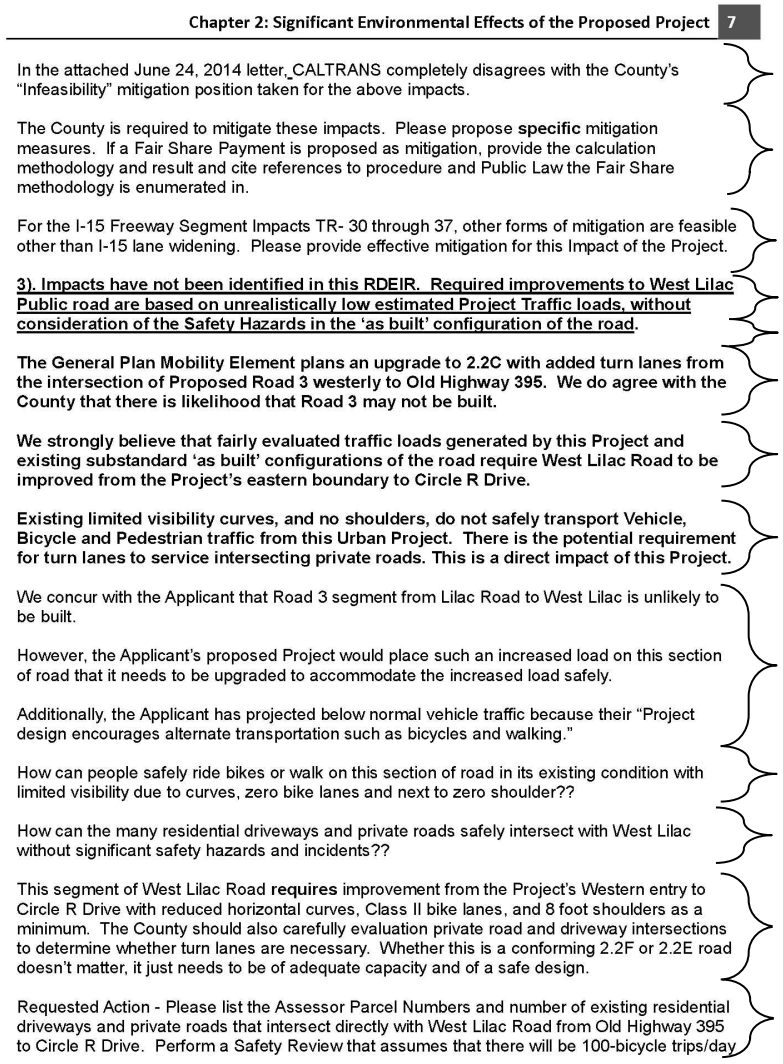
The County has stated that impacts, TR-2, 3, 4, 20, 21, 24, 25, 27, and 28 are infeasible to mitigate, because the Intersection is under CALTRANS jurisdiction.

C1d-21

C1d-20 The comment questions the FEIR determination that significant cumulative impacts to two roads within the jurisdiction of the County (TR-12 and TR-16) are infeasible to mitigate. The referenced cumulative impacts are to Gopher Canyon Road between E. Vista Way and Little Gopher Canyon Road (TR-12), and Pankey Road between Pala Mesa Drive and SR-76 (TR-16). (FEIR, subchapter 2.3.) Both the FEIR and TIS explain the basis for the infeasibility determination. (FEIR, subchapter 2.3; TIS Section 6.4.)

As explained in the FEIR, the improvements necessary to mitigate the identified significant cumulative impacts are to construct the segment of Gopher Canyon Road to Mobility Element 4.1B classification, and the segment of Pankey Road to Mobility Element 4.2B classification. In each case, while the project would add a small amount of traffic (3.5 percent and 5.2 percent, respectively), it would be necessary for the project to fund the full cost of the necessary improvement because these improvements are not currently included in the County's traffic impact fee (TIF) program. Based on the County of San Diego Transportation Impact Fee Program (TIF) Update Facility Cost Analysis (AECOM, August 2012), the cost of improving the 1.2-mile segment of Gopher Canyon road would be $8.5 million (equivalent to $7,097,000/mile for a roadway consistent with the requirements of a 4.1B classified roadway). The cost of improving the 0.7-mile segment of Pankey Road segment would be $5.0 million (equivalent to $7,165,000/ mile for a roadway consistent with the requirements of a 4.2B classified roadway). (see also, County of San Diego General Plan, Mobility Element Tables M-1a, M-1b and M-2). As such, the cost of the improvement is disproportionate to (i.e., not roughly proportional to) the identified impact and, therefore, conditioning the project to construct the improvements is not feasible under CEQA. There are no other feasible improvements to mitigate the identified cumulative impacts because the projected daily traffic volume along each segment would far exceed the threshold for a 2-lane roadway, thereby requiring widening to 4 lanes; thus, the impact would remain significant and unavoidable.

C1d-21 The comment refers to significant intersection impacts that the comment contends the FEIR determined were infeasible to mitigate as the intersections are outside the County's jurisdiction and within the jurisdiction of Caltrans. (FEIR, subchapter 2.3.) Preliminarily, the comment incorrectly refers to impact TR-2, which is not a



Chapter 2: Significant Environmental Effects of the Proposed Project 7

In the attached June 24, 2014 letter, CALTRANS completely disagrees with the County's "Infeasibility" mitigation position taken for the above impacts. C1d-21 (cont.)

The County is required to mitigate these impacts. Please propose **specific** mitigation measures. If a Fair Share Payment is proposed as mitigation, provide the calculation methodology and result and cite references to procedure and Public Law the Fair Share methodology is enumerated in. C1d-22

For the I-15 Freeway Segment Impacts TR- 30 through 37, other forms of mitigation are feasible other than I-15 lane widening. Please provide effective mitigation for this Impact of the Project. C1d-23

3). Impacts have not been identified in this RDEIR. Required improvements to West Lilac Public road are based on unrealistically low estimated Project Traffic loads, without consideration of the Safety Hazards in the 'as built' configuration of the road. C1d-24

C1d-25

The General Plan Mobility Element plans an upgrade to 2.2C with added turn lanes from the intersection of Proposed Road 3 westerly to Old Highway 395. We do agree with the County that there is likelihood that Road 3 may not be built. C1d-26

We strongly believe that fairly evaluated traffic loads generated by this Project and existing substandard 'as built' configurations of the road require West Lilac Road to be improved from the Project's eastern boundary to Circle R Drive. C1d-27

Existing limited visibility curves, and no shoulders, do not safely transport Vehicle, Bicycle and Pedestrian traffic from this Urban Project. There is the potential requirement for turn lanes to service intersecting private roads. This is a direct impact of this Project. C1d-28

We concur with the Applicant that Road 3 segment from Lilac Road to West Lilac is unlikely to be built.

However, the Applicant's proposed Project would place such an increased load on this section of road that it needs to be upgraded to accommodate the increased load safely. C1d-29

Additionally, the Applicant has projected below normal vehicle traffic because their "Project design encourages alternate transportation such as bicycles and walking."

How can people safely ride bikes or walk on this section of road in its existing condition with limited visibility due to curves, zero bike lanes and next to zero shoulder?? C1d-30

How can the many residential driveways and private roads safely intersect with West Lilac without significant safety hazards and incidents?? C1d-31

This segment of West Lilac Road **requires** improvement from the Project's Western entry to Circle R Drive with reduced horizontal curves, Class II bike lanes, and 8 foot shoulders as a minimum. The County should also carefully evaluation private road and driveway intersections to determine whether turn lanes are necessary. Whether this is a conforming 2.2F or 2.2E road doesn't matter, it just needs to be of adequate capacity and of a safe design. C1d-32

Requested Action - Please list the Assessor Parcel Numbers and number of existing residential driveways and private roads that intersect directly with West Lilac Road from Old Highway 395 to Circle R Drive. Perform a Safety Review that assumes that there will be 100-bicycle trips/day C1d-33

C1d-21 (cont.)

Caltrans facility and, in any event, would be mitigated to less than significant, see FEIR, subchapter 2.3.

As to impacts TR-3 and TR-4 [I-15 SB and NB Ramps/Gopher Canyon Road], the FEIR includes mitigation requiring that the applicant either install traffic signals at the intersection, or provide funding for the signalization. (FEIR, subchapter 2.3.) However, because the improvements are not under the County's jurisdiction, there was no assurance the improvements could be implemented and, therefore, impacts were considered significant and unavoidable. (FEIR, subchapter 2.3.) Since circulation of the FEIR for public review, Caltrans has submitted a letter informing the County that it is not opposed to the installation of traffic signals at the I-15 Gopher Canyon Road intersection. (Letter, Armstrong to Slovick, September 4, 2014.) As such, the project applicant will work with Caltrans to obtain the necessary encroachment permit in order to install the recommended traffic signals. (See County responses to letter A2, Caltrans dated June 24, 2014.)

As to impacts TR-20 [SR-76/Old Highway 395] and TR-21 [SR-76/Pankey Road], County staff coordinated with Caltrans and Caltrans confirmed that it has no project, funding, or program to make the necessary improvements to which the applicant can pay a fair-share contribution. (FEIR, subchapter 2.3.) Therefore, because the necessary improvements are outside the County's jurisdiction and there is no plan or program in place to assure construction of the necessary improvements, mitigation is infeasible and the impacts are significant and unavoidable. See discussion below regarding impacts to I-15.

As to impacts TR-24 [I-15 SB Ramps/Old Hwy 395], TR-25 [I-15 NB Ramps/Old Hwy 395], TR-27 [I-15 SB Ramps/Gopher Canyon Road], and TR-28 [I-15 NB Ramps/Gopher Canyon Road], each of the identified intersections is included within the County's transportation impact fee (TIF) program. (FEIR, subchapter 2.3; TIS p. 281.) The TIF program includes the improvements to these roadways required to provide adequate circulation through Year 2030. (FEIR, subchapter 2.3.) Mitigation measure M-TR-8 requires that the applicant pay all applicable TIF fees prior to issuance of any building permit. (FEIR, subchapter 2.3.) With payment of the TIF

C1d-21 (cont.)

fees, impacts would be reduced to less than significant. (FEIR, subchapter 2.3.)

Lastly, the comment refers to the June 24, 2014 comment letter submitted by Caltrans regarding the significant and unavoidable cumulative impacts to Interstate 15, and states that the County is required to mitigate these impacts. As explained in the responses to the Caltrans comments, the FEIR determined that the proposed project, in combination with other cumulative traffic, would result in significant cumulative impacts on I-15 from SR-78 north to the Riverside County boundary. (FEIR, subchapter 2.3; TIS, pp. 267-272, 356-357.) To mitigate the identified impacts it would be necessary to add additional I-15 travel lanes to provide increased capacity. However, there are no plans with a corresponding funding program in place to provide the additional lanes within the timeframe necessary to mitigate the identified impacts. Under CEQA, in circumstances as these in which the necessary improvements are outside of the jurisdiction and control of the lead agency (i.e., County), and the party with jurisdiction and control (i.e., Caltrans) has no plan or program in place to fund and construct the necessary improvements within the necessary timeframe, mitigation is infeasible and the impact is deemed significant and unavoidable. (FEIR, subchapter 2.3; TIS, p. 284.) Please see Global Response: Significant and Unavoidable Impacts to I-15 for additional information responsive to the comment.

As discussed in Global Response: Significant and Unavoidable Impacts to I-15, in order to mitigate the identified impacts to below a level of significance and achieve acceptable level of service (LOS) D or better, freeway mainline capacity would need to be increased by widening the freeway from the current 4 lanes in each direction to 5 or more lanes in each direction. Nonetheless, in an effort to reduce project vehicle trips, as part of the project an interim private on-demand transit service would be established to facilitate resident access to I-15 transit services until the necessary transit linkage is available. (Lilac Hills Ranch Specific Plan [June 2014] (Specific Plan), Section III, Development Standards and Regulations, pp. III-11 to III-12; see also FEIR, Table 1-3, Additional Project Considerations.) In addition, the project includes a requirement that a Transportation Demand Management program be implemented to

C1d-21 (cont.)

foster alternative modes of transportation. (Specific Plan, pp. III-11 to III-12; FEIR Table 1-3, Additional Project Design Considerations.) Please see Global Response: Significant and Unavoidable Impacts to I-15, for additional information regarding these project features and other information responsive to the comment.

C1d-22 Please see response to comment C1d-21 above.

C1d-23 Please see response to comment C1d-21 above and Global Response: Significant and Unavoidable Impacts to I-15.

C1d-24 and C1d-25

FEIR Tables 2.3-23 and Table 2.3-24, as well as Table 10.5 of the Revised TIS, disclose all applicable significant traffic-related impacts, as identified per the County of San Diego - Guidelines for Determining Significance and Report Format and Content Requirements - Transportation and Traffic; June 20, 2012. As documented in both the FEIR and the Revised TIS, the project trip generation was determined using SANDAG's Guide to Vehicular Traffic Generation Rates for the San Diego Region (SANDAG, April 2002) and the distribution of the external project trips was determined based upon three computer-generated "Select Zone" assignments utilizing the Series 12 Year 2050 SANDAG Transportation Model, including 2008 base year, 2050 with Road 3, and without Road 3, in combination with identified project access control (i.e., gates) within the project site. The "Select Zone" assignments are included in Appendix K of the Revised TIS.

The methodology outlined above is the regionally accepted industry standard for determining project trips along on the transportation network. Thus, the number of project trips along W. Lilac Road, which was determined using standard regional practice, is reasonable.

The current substandard conditions of select local roadways within the project study area, including W. Lilac Road, were taken into consideration. As a result, the roadway capacity of these substandard roadway segments was reduced 10 percent to provide a conservative analysis of the project impact under existing conditions. Please see page 41 of the Revised TIS for more detail.

C1d-24 and C1d-25 (cont.)

Since W. Lilac Road between Old Highway 395 and Circle R Drive is a 4-mile-long roadway with different roadway characteristics, please see response to individual roadway segments below:

W. Lilac Road between Old Highway 395 and Circle R Drive: The project proposes to construct this roadway segment to its General Plan classification of 2.2C, this mitigation measure would improve the current facility conditions, as well as provide turn lanes, thus improving the safety condition of this roadway segment.

W. Lilac Road, between Main Street and Street "F": The project is forecast to increase the ADT on this section of W. Lilac Road from the current 1,150 ADT to 2,960 ADT. While this is a significant percentage increase, an ADT of 2,960 is only about 3 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway.

W. Lilac Road between Street "F" and Covey Lane: The project is forecasted to increase the ADT on this section of W. Lilac Road from the current 1,150 ADT to 1,810 ADT. An ADT of 1,810 ADT is only about 2 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway.

W. Lilac Road between Covey Lane and Circle R Drive: The project is forecast to increase the ADT on this section of W. Lilac Road from the current 480 ADT to 2,470 ADT. While this is a significant percentage increase, an ADT of 2,470 ADT is only about 3 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway

C1d-26 The comment is noted. No further response is required.

C1d-27 As noted in the responses to comments C1d-24 through C1d-26 above, the project trip distribution and trip assignment were determined using the Series 12 Year 2050 SANDAG Transportation Model for all studied scenarios. Thus, the project trips were loaded correctly onto W. Lilac Road between Old Highway 395 and Circle R Drive.

As shown in TIS Figure 4-3 through Figure 4-9, the majority of project trips is projected to load onto W. Lilac Road between Old Highway 395 and Main Street.

C1d-27 (cont.)

It should be noted that the project proposes to improve W. Lilac Road between Old Highway 395 and Main Street to the General Plan Mobility Element classification of 2.2C; please see TIS page 162 for more detail. This improvement likely would encourage project trips to use Lilac Hills Ranch Road/Main Street to travel to W. Lilac Road (between Old Highway 395 and Main Street) instead of using the segment of W. Lilac Road between Main Street and Circle R Drive. However, in order to provide a conservative analysis of W. Lilac Road (between Main Street and Circle R Drive), a small portion of the project trips were assigned to this segment; please see TIS Chapter 4 for additional information.

C1d-28 Preliminarily, please see responses to comments C1d-24/25 above regarding traffic loads on West Lilac Road, the subject of the comment. Additionally, specific to safe bicycle and pedestrian travel, the project includes an extensive and thoroughly integrated, 16+ mile Trail Network, including community pedestrian and bike paths, linking together the major project components, including the Town Center and Neighborhood Centers, Neighborhoods, the K-8 school, and the 13.5-acre central park. The trails include a staging area in the Town Center, and three trail connections at the north and south ends of the project to trails defined in the County Trails Master Plan (CTMP).

See FEIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) showing the integration of the project as a whole with the Trail Network. As to West Lilac Road, the project proposes to dedicate and install the designated CTMP segment along the entire length of the south side of West Lilac Road; this public trail would be built as a Type D pathway. (FEIR, subchapter 2.3.) The trails would be designed to County standards as set forth in the Specific Plan to ensure the safety of pedestrians and bicyclists. (TIS, subchapter 2.3.) The project is not expected to generate a large amount of off-site bicycle and pedestrian travel.

The TIS took into account the presence of horizontal curves and narrow shoulders by lowering the capacity of substandard road segments within the study area, including West Lilac Road. (TIS Section 3.3, pp. 37-42.) As shown in TIS Table 5.34, W. Lilac Road between Street "F" (eastern project boundary) and Circle R Drive is projected to operate at acceptable LOS A under project buildout conditions. Additionally, the project would add virtually no traffic to private roads near the project site and, therefore, turn lanes are not warranted.

C1d-29 The comment is noted with respect to the Road 3 segment. With respect to traffic loads on West Lilac Road, as noted in the response to comment C1d-28 above, W. Lilac Road between Street "F" (eastern project boundary) and Circle R Drive was analyzed with a reduced capacity due to horizontal curves and narrow shoulders. As shown in TIS Table 5.34, W. Lilac Road between Street "F" and Circle R Drive is projected to operate at acceptable LOS A under project buildout conditions. Thus, the project would not create a significant impact to this roadway segment; therefore, no additional mitigation measures are necessary.

C1d-30 The comment is believed to address existing West Lilac Road between proposed Road 3 to Old Hwy 395. As noted in the response to comment C1d-28, the project includes an extensive and thoroughly integrated, 16+ mile Trail Network, including community pedestrian and bike paths, linking together the major project components, including the Town Center and Neighborhood Centers, Neighborhoods, the K-8 school, and the 13.5-acre central park. The trails include a staging area in the Town Center, and three trail connections at the north and south ends of the project to trails defined in the County Trails Master Plan (CTMP). See FEIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) showing the integration of the project as a whole with the Trail Network. The trails would be designed to County standards as set forth in the Specific Plan to ensure the safety of pedestrians and bicyclists. (TIS, p. 297.) The project also includes the addition of a multi-purpose pathway along the northern project boundary with W Lilac Road. Pedestrians and bike riders using existing W Lilac Road will have the option of following Main Street within the project and using the sidewalks or designated bike lanes instead of existing W Lilac Road. In addition, existing W Lilac Road will be improved with the multi purpose pathway to accommodate pedestrians and bikes. As such, the project will provide an alternative route for those who would have walked or rode a bicycle along West Lilac Road. In addition, the project is not expected to generate a large amount of off-site bicycle and pedestrian travel.

C1d-31 Please see the response to comment number C1d-24/25 above.

C1d-32 As shown in TIS Table 5.34, W. Lilac Road between Main Street (project's western entry) and Circle R Drive, is projected to operate at acceptable LOS A under project build-out conditions. Thus, the project would not cause an impact to this roadway segment. Therefore, no additional mitigation measures would be necessary. Please see responses to comments C1d-24/25 for additional information responsive to this comment.

C1d-33 The proposed project would improve W. Lilac Road between Old Highway 395 and Main Street to the General Plan Mobility Element classification of 2.2C; please see TIS page 162 for additional information. This improvement likely would result in project trips utilizing Lilac Hills Ranch Road/Main Street to travel to W. Lilac Road (between Old Highway 395 and Main Street) instead of using the substandard segment of W. Lilac Road between Main Street and Circle R Drive. Additionally, as addressed in the TIS, the addition of project traffic to W. Lilac Road between Main Street and Circle R Drive (including the portion listed by the commenter as between Lilac Walk private road and Circle R Drive) would not result in a significant impact. Additionally, the assumption of 100 bicycle trips per day and 50 pedestrian trips per day on the shoulders of West Lilac Road is not supported by evidence. In light of the information presented here, a "safety review" is not warranted.

and 50 pedestrian trips/day on the shoulders of this road. Discuss safety hazards associated with weekly trash collection pick up on West Lilac and daily School Bus pick-up/drop off. Propose Road redesign to safely mitigate all hazards. Disclose all off site improvements required.

C1d-33 cont.

4). Impacts have not been identified in this RDEIR. Required improvements to Circle R Drive Public road are based on unrealistically low estimated Project Traffic loads, without consideration of the Safety Hazards in the 'as built' configuration of the road.

C1d-34

We strongly believe that fairly evaluated traffic loads generated by this Project and existing substandard 'as built' configurations of the road require Circle R Drive to be improved from West Lilac Road to Old Highway 395.

C1d-35

Existing limited visibility curves and zero shoulders do not safely transport Bicycle and Pedestrian traffic from this Urban Project. There is the potential requirement for turn lanes to service intersecting private roads. This is a direct impact of this Project.

C1d-36/37

This segment of Circle R Drive requires improvement reduced horizontal and vertical curves, sight lines, Class II bike lanes, and 8 foot shoulders as a minimum. The County should also carefully evaluation private road and driveway intersections to determine whether turn lanes are necessary. Whether this is a conforming 2.2F or 2.2E road doesn't matter, it just needs to be of adequate capacity and of a safe design.

C1d-38

Requested Action - Please list the Assessor Parcel Numbers and number of existing residential driveways and private roads that intersect directly with Circle R Drive from West Lilac Road to Old Highway 395. Perform a Safety Review that assumes that there will be 100-bicycle trips/day and 50 pedestrian trips/day on the shoulders of this road. Discuss safety hazards associated with weekly trash collection pick up on Circle R Drive and daily School Bus pick up/drop off. Propose Road redesign to safely mitigate all hazards.

C1d-39

5) Safety of Intersection Design – Covey Lane/Rodriguez Private Road and West Lilac Road

The intersection is not designed to County standards (not within 10 degrees of perpendicular), no turn taper is provided, and the sight distance is inadequate. There are intersection spacing requirements that are not met by the County's proposed design configuration

C1d-40

Additionally, a Two Way Stop control is inadequate at this intersection for the Project's traffic volumes. At this intersection, Rodriguez Road shares in a nonstandard 5-way intersection and there is a proposed 15X increase in vehicle, bicycle and pedestrian traffic for the Project.

C1d-41

Staff has explained that Rodriguez Road is an existing roadway and is not proposed as access for the project and would only be used for emergencies. Even if Rodriguez Road is only used for Emergencies and an injury accident attributable to intersection design occurs, **does the County really NOT want to review this intersection for hazards??** Please have County Counsel refer to *West v County of San Diego 37-2008-00058195-CU-PO-NC.*

C1d-42

Requested Action – Based upon fair and unbiased Traffic projections that include Project vehicle, bicycle and pedestrian traffic, perform a Safety evaluation of the design of this intersection. If there are any improvements required, provide a plan that indicates construction details, including details of off-site improvements required. Process (yet another) Exception Request if necessary.

C1d-43

C1d-34 The project trip distribution and assignment (i.e., project traffic loads) was derived using a SANDAG Series 12 Select Zone Assignment; use of the SANDAG model is accepted practice throughout San Diego County. As shown on Figure 4-7 of the project TIS (Project Trip Distribution – Phase E, Buildout), the project is anticipated to contribute a maximum of 7.8 percent of its total daily traffic (or 1,180 ADT) to Circle R Drive between Old Highway 395 and W. Lilac Road. See SANDAG Series 12 Select Zone Assignment, which is provided in Appendix K of the TIS.

As documented on Page 50 of the TIS, project access to Circle R Drive via Mountain Ridge Road will be gated (code access only) with only the senior community and assisted living facilities south of Covey Lane having access to the gate. Please refer to Figure 7-1 of the TIS for the proposed locations of the gates.

Phase 5 of the project, which is projected to generate a maximum of 1,594 ADT (please refer to Figure 4-2D of the TIS for Phase 5 geographical location) will be the only area within the project that will directly access Mountain Ridge Road (which provides a direct connection to Circle R Drive). As shown in Appendix L of the TIS, 65 percent of Phase 5 of the project will access Circle R Drive via Mountain Ridge Road, resulting in 1,036 trips from Phase 5 traveling directly to Circle R Drive. The remaining 144 trips (which when added to 1,036 = 1,180 as stated above) are traffic from Phases 1-4 of the project that choose to use Circle R Drive via Covey Lane and W. Lilac Road (south of Covey Lane) to access the regional network.

C1d-35 Please see response to comment C1d-34 above in regards to the project trip distribution and assignment to Circle R Drive. As shown in Table 10.1 of the TIS (page 315 of the TIS), Circle R Drive would operate at level of service (LOS) D) or better under all scenarios, which does not exceed County LOS standards. Since Circle R Drive is projected to operate at acceptable LOS under all scenarios, the proposed project would not have a significant impact on Circle R Drive and, thus, the project is not required to improve this road.

Additionally, the project is proposing to signalize the intersection of Old Highway 395/Circle R Drive, which will improve both the safety and operations at this intersection and the adjoining roadway segments

	C1d-36/37 Preliminarily, please see Responses to Comments Nos. C1d-34 and C1d-35 above regarding traffic loads on Circle R Drive, the subject of the comment. Additionally, specific to safe bicycle and pedestrian travel, as noted in prior responses, the project includes an extensive and thoroughly integrated, 16 plus mile Trail Network, including community pedestrian and bike paths, linking together the major project components, including the Town Center and Neighborhood Centers, Neighborhoods, the K-8 school, and the 13.5 acre central park. The trails include a staging area in the Town Center, and three trail connections at the north and south ends of the project to trails defined in the County Trails Master Plan (CTMP). The project will provide an alternative route for those who would have walked or rode a bicycle along West Lilac Road to Circle R Road. As such, pedestrians and bike riders will be able to choose an alternative route that is more safe than the existing route of W Lilac Road to Circle R Road by following the new trails that would connect at multiple locations to exsiting W Lilac Road and to Circle R Road via Mountain Ridge Road. See FEIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) showing the integration of the project as a whole with the Trail Network. The trails would be designed to County standards as set forth in the Specific Plan to ensure the safety of pedestrians and bicyclists. (TIS, p. 297.). The TIS took into account the presence of horizontal curves and narrow shoulders in reducing the capacity of roads within the study area, including Circle R Drive. (TIS, pp. 37-42.) The project would add minimal traffic to private roads near the project site and, therefore, turn lanes are not warranted. C1d-38 As shown in TIS Table 3.1, Circle R Drive, as well as other existing substandard built roadways, were conservatively analyzed assuming a reduced roadway capacity threshold under Existing Conditions (Circle R Drive was analyzed with a reduced LOS D threshold of 9,800 ADT as compared to 10,900 ADT, which is standard for a 2.2E roadway).

C1d-38 (cont.)

At a worst case scenario, Circle R Drive is projected to carry 8,050 ADT under the Horizon Year Base Plus Project conditions (with Road 3). This is within the County 2.2E roadway LOS D capacity threshold (10,900 ADT) and the assumed reduced Existing Conditions LOS D capacity threshold (9,800 ADT). Thus, Circle R Drive would be able to accommodate the anticipated future demand. Additionally, the project adds minimal traffic to private roads near the project site and therefore turn lanes are not warranted.

C1d-39 The assumption of 100 bicycle trips per day and 50 pedestrian trips per day on the shoulders of Circle R Drive is not supported by evidence. Additionally, as identified in the FEIR and TIS, the addition of project traffic to Circle R Drive would not result in a significant traffic impact requiring road improvements. Therefore, the "safety review" is not warranted.

C1d-40 Please see Global Response: Easements (Covey Lane and Mountain Ridge Roads), which addresses intersection design relative to sight distance at the intersection of Covey Lane and West Lilac Road

C1d-41 The two-way stop control analysis for the intersection of W. Lilac Road/Covey Lane was conducted based on the methodologies contained in the Highway Capacity Manual 2010 (HCM 2010), which is standard practice for the County of San Diego, as well as the national standard for all traffic engineering. The analysis results were calculated using SYNCHRO 8 traffic analysis software, which is the standard analysis software used throughout the industry.

Details regarding the analysis methodology are provided in Chapter 2 of the TIS. As shown in TIS Table 6.3, the intersection of W. Lilac Road/Covey Lane is projected to operate at acceptable Level of Service B under the Existing Plus Cumulative Projects Plus Project condition. LOS B is an acceptable condition based on County standards and, therefore, two way stop control is sufficient.

Additionally, based on the projected volume under Horizon Year Base Plus Project Conditions without Road 3, the intersection of W. Lilac Road / Covey Lane would not meet a signal warrant, meaning that a signal is not needed at the intersection. Please see Attachment A for the signal warrant.

C1d-42 The comment references the sight distance at the intersection of Covey and West Lilac, which also intersects with Rodriguez Road. As discussed in Shapter 1.0 of the FEIR, per the County sight distance requirements, the minimum corner intersection sight distance is 480 feet for a prevailing speed of 48 miles per hour, and 400 feet for a prevailing speed of 40 miles per hour. The existing maximum line of sight at the intersection of Covey Lane and West Lilac Road is 330 feet. A line-of-sight distance of 480 feet would be achieved by grading and clearing on property APN 129-190-44. This area is comprised of ornamental trees and a number of coast live oaks. The bank would be lowered and a number of trees removed. Please refer to subchapter 2.5 for a discussion of biological impacts. Standard County conditions of approval for a Tentative Map require all street intersections to conform to the intersectional sight distance criteria of the Public Road Standards of the Department of Public Works. The project proponent would therefore, request an off-site Clear Space Easement from the property owners. Should an easement not be granted, the County would acquire the sight distance by condemnation through funds provided by the project applicant.

C1d-43 The underlying premise of the comment is incorrect; the traffic projections were determined based on standard methodology utilized throughout San Diego County. The anticipated project trip generation was derived based on the rates and methodologies contained in the SANDAG Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002, which is the standard for estimating project trip generation within the County of San Diego and the region as a whole. Project trip distribution was based on a SANDAG Series 12 Transportation Forecast Select Zone Assignment, which is the standard methodology (for projects generating over 2,400 daily trips) within the County of San Diego, as documented in the County of San Diego - Guidelines for Determining Significance and Report Format and Content Requirements - Transportation and Traffic; August 24, 2011.

As shown in TIS Table 6.3, the intersection of W. Lilac Road/Covey Lane is projected to operate at acceptable Level of Service B under the Existing Plus Cumulative Projects Plus Project conditions. Based on the projected operations, the intersection would not require any additional improvements to accommodate project traffic.

6) Safety of Intersection Design – Covey Lane (proposed to be Public) and existing Covey Lane Private Road

The proposed intersection of the two roadways is not designed to Standard. No exception request has been processed.

Requested Action – Analyze the intersection and either propose construction to standard or prepare (yet another) Exception Request.

C1d-44

7) Safety of Intersection Design – existing Covey Lane Private Road and Lilac Hills Ranch Road (LHRR) (LHRR route across APNs 128-290-78 and 129-010-69)

We requested a review of the limited sight line of this intersection, and to include intersection design details in August 2013 for compliance with standards.

This information, its related Impacts and Mitigation potential has not been assessed in the EIR.

Information has been provided about a different intersection of Lilac Hills Ranch Road and a new proposed and not yet built Covey Lane Private Road all within the boundaries of the proposed subdivision within the boundaries of current APN 129-010-69. We have no questions about this intersection.

Requested actions – Provide off-site grading plan details of Lilac Hills Ranch Road across APN 128-290-78 to 129-010-69. Provide intersection details of the intersection of 'as built' existing Covey Lane private road and Lilac Hills Ranch Road. Analyze the intersection for conformance to design standards and process (yet another) Exception Request if necessary.

C1d-45

8) Safety of Intersection Design – Mountain Ridge Private Road and Circle R Public Road
The Applicant's March 8, 2011 instrumentation of Circle R Drive at Mountain Ridge recorded an 85th percentile speed of 49 Mph Eastbound and a 47 Mph Westbound. This intersection likely needs additional intersection control beyond a Stop Sign on Mountain Ridge at the levels of increased traffic the Project proposes.

Requested Action – Perform intersection Traffic Safety analysis and recommend compliant intersection designs in conformance Public Road Design Standards. If this has been done, perform a Critical Review of the analysis and share it with the Public.

C1d-46

9) Estimate of Student Population and its impact on Traffic – The Project has arbitrarily used non-standard estimating factors to project the number of Students, and therefore has understated the Student population and directly related Trip Generation.

The table below recaps how the Applicant has excluded the 468 Senior Dwelling Units from a Student Population Factor.

C1d-47

C1d-44 There are no issues with either of these intersections. All intersections associated with the development have been analyzed in FEIR subchapter 2.3. There are no issues, line of sight, or otherwise with these two intersections in question

C1d-45 There are no issues with either of these intersections. All intersections associated with the development have been analyzed in FEIR subchapter 2.3. There are no issues, line of sight, or otherwise with these two intersections in question.

C1d-46 An analysis of the Mountain Ridge Road / Circle R Drive intersection performed in the TIS determined that a stop sign control on Mountain Ridge Road is adequate to accommodate build-out project traffic. Please also see Global Response: Easements (Covey Lane and Mountain Ridge Road), for additional information responsive to the comment

C1d-47 The FEIR did not use arbitrary factors to project the number of students and has not underestimated student population, as detailed below.

Student Generation Factors:

Subchapter 3.1.5.2 of the FEIR discusses the projects potential demand on schools. Specifcally, FEIR Table 3.1.5 provides an estimate of new student generation based on Student Generation Rates (SGR) associated with type of dwelling units as applied by the assiciated Valley Center and Bonsall school districts. Table 3.1.5 estimates that the project could generate a total of 1,038 new students.

In order to assure the adequacy of the FEIR analysis, the most recent School Fee Justifcation Reports for the relevant school districts were referenced and the calculation revised based on these SGR. The following table reflects the updated calculations:

C1d-47 (cont.)

School District	Grades	Student Generation Rate (student/DU)	Proposed Residential Units Within District	Project Student Generation[2]
VCPUSD[1]	K-6	SFD = 0.1658 SFA = 0.1165	SFD = 173 SFA = 105	SFD = 29 SFA = 12
	7-8	SFD= 0.0868 SFA = 0.0767		SFD = 15 SFA = 8
	9-12	SFD = 0.1383 SFA = 0.0952		SFD = 23 SFA = 10
				Total: 97
BUSD[3]	K-8	SFD = 0.369 SFA = 0.379	SFD = 730 SFA = 270	SFD = 269 SFA = 102
	9-12[4]	SFD = 0.1383 SFA = 0.0952		SFD = 101 SFA = 26
				Total: 498

As shown, using the 2012 SGR, the project would generate a total of approximately 595 students. These factors result in the project's current SGR to be lower than that included in the FEIR. Notwithstanding, the FEIR analysis remains unchanged. Even using the higher SGR impacts associated with the increases in school aged students, impacts would be less than significant.

With respect to the comment that the FEIR should include of the 468 Senior Dwelling Units in the SGR calculations, the School Fee Justification Reports do not support the claim. While these homes would be required to pay school fees, there is no indication that they would be utilized in the factors to determine the number of students generated from the project site.

Project Student ADT Generation

As shown in Table 12.2 of the Lilac Ranch Traffic Impact Study (FEIR Appendix E), the project would generate 1,354 daily trips based on a total of 895 students. The calculation of ADT is based on a higher SGR than shown above, and is therefore based on a greater number of students than would be generated based on the

C1d-47 (cont.)

2012 School Fee Justification Reports. Table 12.2 does not take Senior Dwelling Units into account because these units do not account for the generation of students. However, as shown in the table below, even assuming the senior homes are added to this scenario, no additional significant impacts would occur as LOS D or better operations would be maintained at the subject study area intersections.

Table 12.2 included in TIS Section 12.0, provides a supplemental analysis of a no school alternative; that is, if no school were built on the project site, how would this alternative affect study area traffic. The comment points out that in calculating the number of students that would be generated by the proposed project, the analysis excluded senior housing. However, as shown in the table below, even assuming the senior housing, no additional significant impacts would occur as LOS D or better operations would be maintained at the subject study area intersections.

TABLE A
AM PEAK HOUR INTERSECTION LEVEL OF SERVICE RESULTS
EXISTING PLUS PROJECT BUILDOUT WITHOUT ON-SITE SCHOOL CONDITIONS

Intersection	Traffic Control	With Project Buildout no On-Site School		Existing		Change in Delay (sec.)	Direct Impact?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS		
18. W. Lilac Road / Covey Lane	TWSC	23.8	C	8.8	B	15.0	No
20. W. Lilac Road / Circle R Drive	OWSC	33.6	D	9.3	A	24.3	No
21. Lilac Road / W. Lilac Road	OWSC	25.8	D	9.6	A	16.2	No
22. Lilac Road / Old Castle Road	OWSC	33.1	D	11.8	B	21.3	No
23. Valley Center Rd / Lilac Road	Signal	15.2	B	10.5	B	4.7	No
24. Miller Road / Valley Center Road	OWSC	24.1	C	16.9	C	7.2	No
25. Cole Grade Road / Valley Center Road	Signal	37.2	D	31.1	C	6.1	No

Synchro analysis worksheets are included as Attachment to the response to comments.

APPLICANT'S		K-8 Students		High School Students		ADT/Student		Total Student		Total
CALCULATION		Students/		Students/		Factor		ADT Generation		ADT
Dwelling Units (DU)		DU	Students	DU	Students	K-8	9-12	K-8	9-12	
Non- Senior	1278	0.5	639	0.2	256	1.6	1.3	1022	332	
Senior	468	0	0	0	0	1.6	1.3	0	0	
Total	1746		639		256			1022	332	1355
SCHOOL DISTRICT		K-8 Students		High School Students		ADT/Student		Total Student		Total
CALCULATION		Students/		Students/		Factor		ADT Generation		ADT
Dwelling Units (DU)		DU	Students	DU	Students	K-8	9-12	K-8	9-12	
Non- Senior	1278	0.5	639	0.2	256	1.6	1.3	1022	332	
Senior	468	0.5	234	0.2	94	1.6	1.3	374	122	
Total	1746		873		349			1397	454	1851
							UNDERSTATEMENT OF ADT			496

The San Diego County Office of Education has explained that the ratio of Students/Dwelling Unit is based on current San Diego County total Housing demographics, including Senior Housing. ALL Dwelling Units need to be multiplied by the Student/DU factor.

Requested actions- The Project has understated its ADT generation by 496. Increase the Trip Generation by 496. Increase the Student Count and rerun the Traffic simulation.

C1d-47, cont.

10) Traffic Impact of On Site v. Off Site Schools – The Project TIS baseline was run with the assumption that there would be an on-site K-8 school. There is no agreement from either Bonsall or Valley Center Pauma School Districts to place a School on site.

The on-site school assumption yielded a total Project ADT of 19.408 total trips, 15,151 external.

The offsite Alternate School TIS analysis represents a revised total Project ADT of 18,334 total trips, 14,932 external.

This analysis does not appear to be correct.

The on-site School likely would have been attracting some trips from outside the Project, but the on-site school was a major part of the Project's argument for lower than standard external trip distribution.

The off-site school scenario with car trips to Bonsall and bus and car trips to Valley Center should produce HIGHER external trips.
Requested action- Please provide a comprehensive explanation of the why external trips did not increase for the "No School" Alternative Chapter 12 in the TIS.

C1d-48

11) Project Trip Generation - Trip Generation was challenged in Aug 13 at 19,428 as being 12% low. Accretive's response after comments is 19,406 ADT. Respond in detail to each question raised in the attached August 2013 comments on the Traffic Impact Study by an independent certified Traffic Engineer.

The County has accepted on THE APPLICANT"S UNILATERAL assessment of the trip generation of the commercial land uses, even though a licensed Professional Traffic Engineer

C1d-49

C1d-48 The traffic analysis with the on-site schools option was conducted under the assumption that the on-site school would attract additional external trips to/from the project site, including students from outside of the project area, delivery vehicles, and school staff trips. Students from within the project site are assumed to bike, walk, or be dropped-off by a parent. These trips would not leave the project site.

As shown in TIS Table 4.8, the project would generate 19,408 total trips with 15,151 external trips, resulting in a 22% internal capture. Under the off-site school alternative, the project would generate 18,334 total trips (due to the removal of the on-site school) with 14,932 external trips, resulting in a 19% internal capture. (TIS pp. 366-371.) As shown in the calculation above, without the on-site school, the project would have a lower internal capture rate, but overall trips would be reduced since the on-site school would attract trips from outside the area as well, which would no longer be generated under the off-site school scenario. Traffic impacts associated with the school use (should the school not be built) are accounted for in the projects Traffic Impact Study (FEIR Appendix E).

C1d-49 The trip generation comments contained in the referenced August 2013 comment letter addressed the commercial trip generation rates utilized in the originally circulated Draft EIR and corresponding traffic study, primarily the rate for a market to be included in the Town Center. In response, both the FEIR and corresponding TIS addressed the subject. (See FEIR, subchapter 2.3; TIS, pp.67-73.) In addition, responses to the August 2013 comment letter have been prepared and are included in these responses to comments. Please see responses to Letter I51L. As explained in the responses that follow, the trip generation rates utilized in the FEIR and corresponding TIS for the proposed market are correct.

found that the Trip Generation should be 21,744 ADT, nearly 12% higher.

C1d-49, cont.

The Applicant's top level qualitative argument "because the project does not propose the type of high traffic generating, high turnover type land uses that in part characterize the commercial uses utilized by SANDAG in calculating the 40/1,000 SF SC/SR rate, the proposed project land uses are expected to generate less traffic than what the SANDAG defined commercial uses would generate (as described above) and therefore the SR/SC rate is the most appropriate for this analysis."

This argument is nothing other than arm waving without substance.

C1d-50

Figure 1.4a in Chapter 1 identifies the same store as "Anchor Grocery." The appropriate trip generation metrics for this use should be "Grocery Supermarket." The Project argues that "their pedestrian-friendly" design will facilitate people walking to the "General Store. The Project's Trip Generation argument is unsupported by facts.

C1d-51

Requested Action – At the Applicant's expense, have an independent licensed Traffic Engineer selected by a DPW selection team that is "firewalled" from contact with any representative of the Applicant or any County of San Diego employee involved with the Project. Allow the 3d party Traffic Engineer to analyze the disparity in Trip Generation and fairly and equitably adjudicate the difference.

C1d-52

12). Internal Capture – was challenged as being high at 22% in August 2013 and without support. AM peak has climbed to 30% with even less substantiation.

Requested Action – At the Applicant's expense, have an independent licensed Traffic Engineer selected by a DPW selection team that is "firewalled" from contact with any representative of the Applicant or any County of San Diego employee involved with the Project. Allow the 3d party Traffic Engineer to analyze the disparity in Internal Capture and fairly and equitably adjudicate the difference.

C1d-53

13) Mountain Ridge, Covey Lane, and Rodriguez Road traffic (Where did 780 trips go?)- The table below analyzes the difference in TIS Project Traffic ADT at Covey Lane and Mountain Ridge. Rodriguez Road information is not provided, and the TIS insists that Rodriguez is only used for Emergency Access.

PROJECT + EXISTING ADT ESTIMATES
BUILDOUT (from Table 7.2 TIS)

	Jun-13 TIS	Jun-14 TIS	Increase/ (Decrease)
Mountain Ridge Pvt Road	2260	1190	(1070)
Covey Lane Pvt Road	1100	1390	290
Total ADT			(780)

So, where did the 780 trips go? The only other way out other than Rodriguez Road is Lilac Hills Ranch Road to Main Street, and the Traffic did not increase correspondingly at those locations. And the Applicant insists Rodriguez is only used for Emergency Access.

C1d-54

C1d-50 The FEIR and TIS contain quantitative support for the trip generation rates utilized in the traffic analysis. See FEIR, p. pp. 2.3-18 to 2.3-20; TIS, pp.61-73.

Specific to the commercial uses, the proposed project would include a neighborhood-serving general store located within the Town Center. (Lilac Hills Ranch Specific Plan (June 2014), p. III-67.) As described in TIS Section 4.3, p. 68, the town center would include a general store of up to 25,000 square feet of leasable area, designed as a rural general merchandise store that carries a broad selection of merchandise, staple food items, household goods and specialty items. The store would be intended as the place where people from the town and surrounding rural areas come to purchase general goods. The difference from a convenience store or grocery store is that the proposed store would be community-serving rather than a regional grocery store that typically exceeds 50,000 square feet of leasable area.

The trip generation rates utilized in the FEIR traffic analysis were developed utilizing SANDAG's Guide to Vehicular Traffic Generation Rates for the San Diego Region. (TIS, pp. 68-73.) Specific to the neighborhood serving commercial uses, including the general store, the analysis utilized the SANDAG "Specialty Retail/Strip Commercial" (SR/SC) of 40 vehicle trips per thousand square feet (ADT/1,000 SF). The shopping areas provided as examples of this category of use in the SANDAG Guide (e.g, Flower Hill Mall, Del Mar Plaza) include within the shopping area high traffic generating land uses such as sit down high turnover restaurants that independently would generate 160 ADT/1,000SF, fast food restaurants and convenience stores that independently would generate 700 ADT/1,000 SF, and a small general market. Thus, despite the presence of a number of high traffic generating land uses,SANDAG has assigned a trip rate of 40 ADT/1,000 SF to these areas, which accounts for the fact that each use is located within walking distance of the other uses – one vehicle trip to Flower Hill, for example, would potentially enable the driver to visit a half dozen different businesses without generating additional vehicle trips, thereby substantially reducing the number of trips that otherwise would be generated if these uses were situated in different locations requiring a separate trip to each location. Similarly, Lilac Hills Ranch is to be developed into a pedestrian-oriented self-sustainable community in which all of the residential units would be located within one-half mile of the

C1d-50 (cont.)

community serving commercial areas, and the commercial areas would include multiple businesses. Overall, because the project does not propose the type of high traffic-generating, high turnover type land uses that in part characterize the commercial uses utilized by SANDAG in calculating the SC/SR rate, the proposed project land uses are expected to generate less traffic than what the SANDAG-defined commercial uses would generate and, therefore, the SR/SC rate is the most appropriate for the analysis.

To illustrate the propriety of use of the 40/1,000 SF trip generation rate for the Lilac Hills Ranch commercial/retail uses, the project traffic engineer worked with SANDAG to conduct a new select zone assignment that replaced 25,000 SF of space analyzed in the TIS at the SR/SC rate of 40/1,000 SF with a "supermarket" trip rate of 150/1,000 SF, which is the rate typically applied to high traffic, large-scale grocery stores such as Von's or Ralph's. And, in response to comments submitted on the originally circulated Draft EIR, the new select zone assignment also replaced 28,500 SF of single-tenant office space analyzed in the TIS at a rate of 14/1,000 SF with 28,500 SF of space analyzed at the "standard commercial office" trip rate of 20/1,000 SF. All other land uses, amounts and trip rates utilized were unchanged from those in the TIS. The purpose of the analysis was to determine whether use of these higher trip generation rates for these two use types would alter the results of the analysis presented in the TIS.

The results of the analysis showed that the two alternative land uses would result in a higher internal capture rate and lower external rate than resulted in the TIS, which reflects the higher attraction rate attributable to a "supermarket" use than "specialty retail/strip commercial" uses. This increased internal capture, in turn, resulted in the number of external trips being almost identical to the number that would be generated under the land uses and corresponding trip rates utilized in the TIS. Therefore, the conclusions reached in the TIS would not change even if different trip rates had been utilized for the proposed uses

C1d-51 Please see Response to Comment C1d-40 for information responsive to the comment.

	C1d-52 Please see Responses to Comment C1d-47.No further analysis of the trip generation rates utilized in the TIS is warranted. C1d-53 The comment is incorrect; overall internal trip capture is unchanged at 22%. As explained in the TIS at pp. 66-67, the proposed Lilac Hills Ranch project includes residential, commercial, office, school, and recreational uses and not all trips generated would leave the project site given the nature of the project land uses. Estimates for internal versus external trip generation percdentages were developed based upon likely origins/destinations of each land use type. JProject trips were disaggregated into those that would remain within the project site (internally captured), and those that would leave the project site (external trips). Only external trips were distributed and assigned to the study area roadways at project buildout. As shown on TIS Table 4.8, 22% of daily trips, 30% of AM peak hour trips, and 22% of PM peak hour trips were considered as internal trip capture rates for the TIS. The higher AM peak hour internal capture rate is attributable to the proposed on-site K-8 school; according to SANDAG's trip generation guide, approximately one-third of school trip generation occurs during the AM peak hour. Therefore, a higher AM peak hour internal capture rate was utilized. For comparison purposes, and to validate the internal capture rates utilized in the TIS, a SANDAG Select Zone Assignment was conducted with all land uses modeled in one Traffic Analysis Zone (TAZ). The model output identified a 28.8% overall daily internal capture rate (as noted above, the TIS utilized a 22% daily rate). An ITE Multi-Use Trip Generation Calculation also was performed and it resulted in internal capture rates of 22.2% (daily), 35.8% (AM peak), and 22.3% (PM peak). (TIS, pp. 66-67.) C1d-54 The 2013 traffic study assumed Phases 4 and 5 of the project would utilize Mountain Ridge Road. The current site plan limits the use of Mountain Ridge Road to only Phase 5, which is the reason for the decrease in Mountain Ridge Road traffic and the increase in Covey Lane traffic when comparing the two reports. Under this scenario, the balance of the Mountain Ridge road trips would use the project access points to Main Street.

C1d-54 (cont.)

In addition, the two 7.2 Tables, (in the 2013 and 2014 reports) are not comparable since the 2014 table includes cumulative project traffic as well. However, a comparison of the traffic in Table 7.2 of the 2013 report to Figure 4.14A in the 2014 report shows the total volumes are almost identical, with the only difference being due to rounding.

	June 2013 TIS (Table 7.2)	June 2014 TIS* (Table 7.2)	June 2014 TIS (Figure 4-14A)
Mountain Ridge Road	2,260	1,190	840
Covey Lane	920	1,390	1,190
Main Street (West)	8,430	9,300	9,300
Main Street (East)	1,040	1,340	1,340
Total	12,650	13,220	12,670
Different (2014 vs. 2013)		-570	-20

*Includes project and cumulative traffic

Requested Action – Answer this question. Also please detail the **precise** conditions under which Rodriguez Road would be used for "Emergency Access" and by whom.

C1d-54, cont.

14) Mountain Ridge Project Grading and Environmental Impacts

Another interesting "oh, by the way" disclosure in Table 7.2 of the TIS is the fact that the Project proposes grading improvements on Parcels 129-300-31 and 129-300-36 to lengthen vertical curves.

Please provide evidence that there are adequate Project rights for construction of these improvements, including temporary encroachment permissions for construction that enable continued use of the road by Residents during construction.

C1d-55

Please also discuss where in the RDEIR the Environmental Impacts of these proposed off site improvements are analyzed. We have yet to locate any of the Impacts related to Construction disruption, noise, and other encroachment impacts.

C1d-56

2.4 Agricultural Resources

2.4.1.1 Regulatory Framework

DEIR: Subchapter 2.4 Agricultural Resources

- Prime Farmland has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to Natural Resources Conservation Service (NRCS) mapping. **The project site does not contain any land designated as prime farmland**.
- Farmland of Statewide Importance possesses minor shortcomings when compared to Prime Farmland, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping.

C1d-57

Comment: *It would be wise to update the definition of "prime farmland" in this area of San Diego County. It is clear that many farm operations are now employing greenhouse and nursery operations, which require a much lower amount of irrigation as well as existing on-property soil quality. Imported soil amendments and tents are frequently used. A year-round growing season, characteristic of San Diego County, brings this land much closer to "prime farmland" as compared to farmlands in more inhospitable climates.*

Comment: *In addition, this project will not be build for several-to-many years, particularly in its later phases. The nature of agriculture in America in general and San Diego County in particular will have changed and evolved by that time and so will the classification of the land. The usefulness of all lands in and near the LHR project will have "improved." It would be wise for the developer and those involved in this project to provide a wide-reaching study—regional, State, National & International—to demonstrate how others rate and use their farmlands.*

C1d-58

Comment: *Does "prime farmland" have a relative definition? The flatness of the mid-west and San Joaquin Valley obviously adds to the number of acres of "prime." So does the drainage aspect of the San Joaquin. However, San Diego County is rolling and hilly, leaving it a poor comparison to US "breadbasket" areas. I would like to see a more detailed report that would redefine "prime farmland" relative to San Diego County. Please include how other entities--regional, State, National & International—view and*

C1d-59

C1d-55 Please see the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties.

C1d-56 The potential noise impacts associated with construction of the proposed project are addressed in FEIR subsection 2.8. Project grading is addressed in FEIR Chapter 1.0. With respect to the net import or export of fill, project construction would be a balanced cut/fill operation, as shown on FEIR Table 1-4. During construction phasing, however, there would be some areas with a net cut and others with a net import. Those sites with net cut would be used as borrow sites. For example, there would be nearly one-half million cubic yards of net cut in Phase 3A, which is located directly adjacent to Phase 1. This area would be used for stockpiling, as needed through the subsequent phases.

C1d-57 Whether the definition of soil ought to be revised in County guidance is beyond the scope of the EIR analysis. Please see Global Response: Agricultural Resources, Indirect Effects for information relevant to this comment based on existing resources.

C1d-58 To attempt to predict the evolution of agriculture during the timeframe corresponding to the build-out of this project would be speculative. Regardless, the Agricultural Resources Report (FEIR Apendix F, subchapter 3.2) and the Global Response: Agricultural Resources, Indirect Effects discusses the mitigation measures and project design considerations (and their effectiveness) which would be in effect along the boundaries of the project regardless of the types of agriculture that may or may not be occurring in the future.

C1d-59 See response to comment C1d-57.

define their "prime" farmland.

C1d-59, cont.

DEIR: Subchapter 2.4 Agricultural Resources

- Unique Farmland is of lesser quality soils used for the production of the state's leading agricultural crops. Unique Farmland includes areas that do not meet the above stated criteria for Prime Farmland or Farmland of Statewide Importance, but that have been used for the production of specific high economic value crops during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods.

Comments: *Under the current trends towards nursery and greenhouse crops, all of the lands in this area would likely qualify as "Unique Farmland." The LHR project could dilute the effect and hamper the production of neighboring farmlands. In addition, since these types of productions are fairly new, it would be unwise and unproductive to consider past use alone, if at all. This area has the potential to continue to grow into a large and thriving industry of locally grown products. Please provide modern and wide-reaching studies—regional, State, National & International--of the characteristics of such operations nationally and internationally as well as the effect of dilution/disruption in urban and suburban proximate areas.*

C1d-60

Comment: *Rather than rating along the lines of history of having irrigated crops, would not it be more relevant to rate these lands in terms of proximity to other farmlands? Please expand your study to include other agricultural areas, nationally and internationally, and how they rate their multi-use farmlands, particularly in proximity to urban and suburban areas as well as the effect of having farmland uses grouped together vs. atomized.*

C1d-61

Comment: *Various reports and documents rate Valley Center's agricultural resources as important to the local economy. Please provide a further broad-reaching study depicting the potential disruptive and dampening effect this project will have economically on the VC area and SD County. Please give detailed justification for the likelihood that support of the LHR project contradicts the SD County Board of Supervisor's assertion that VC agriculture is important for the County economy.*

C1d-62

Comment: *It is difficult to know what future agricultural operations could begin in areas that surround this project. Limitations and restrictions of pesticide use could make many agricultural operations more costly or impossible. Considering current and future uphill agricultural battles such as the importation of overseas infestations and foreign competition, the existence of LHR in this area could severely inhibit this area economically. A much more detailed study must be done that encompasses any reasonable restrictive scenario, its instrumental and economic impact upon all potential agricultural operations and, in turn, its impact upon the broader area. Please include regional, national and international scenarios.*

C1d-63

Comment: *Are effects of the project considered generally for surrounding areas: immediately, community & regionally? Please provide a study regarding this topic.*

C1d-64

DEIR: Subchapter 2.4 Agricultural Resources

The County has completed a contract with American Farmland Trust to help develop the Farming Program. The Farming Program is intended to create the framework for an economically and environmentally sustainable farming industry for San Diego County.

The program, when adopted, **will include land use policies and programs to keep land available and affordable for farming** on a voluntary basis. It will also include economic development tools to help improve farm profitability.

Comment: *What is the AFT's evaluation of this project and its effects upon the viability and continuance of this area for profitable farming into the future? Are there implications in this document of the potential effects of the LHR project?*

C1d-65

Comment: *With a dense residential and multi-use project, restrictions on pesticide use will undoubtedly become more stringent, possibly crippling agriculture in the surrounding area. A detailed study*

C1d-66

C1d-60 See Global Response: Agricultural Resources, Indirect Effects for information relevant to whether the poject would impact adjacent active agriculutral operations. Relative to the request for a study to be performed at the state, national, and international level, the need to perform these studies is an opinion of the commenter and is not supported by the County or CEQA Guidelines.

C1d-61 See Global Response: Agricultural Resources, Direct Effects for information relevant on the various rating systems used to evaluate agricultural resources within the project site. The global response also provides information supporting the appropriateness of the evaluation relative to San Diego County agricultural types. The need to perform studies at the state, national, and international level is an opinion of the commenter and is not supported by the County or CEQA Guidelines.

C1d-62 See Global Response: Agricultural Resources, Indirect Effects for information relevant to the economic viability of agriculture within Valley Center as well as other indirect and “edge” effects that have the potential to impact the ongoing viability of agriculture adjacent to the project site.

C1d-63 See Global Response: Agricultural Resources, Indirect Effects as well as the FEIR Appendix K, Section 3.2 which provide information about indirect impacts relative to the agricultural operations surrounding the project site. Three mitigation measures and three project design considerations would be implemented. These measures would reduce the impacts associated with limitations and restrictions to below a level of significance. The analysis focuses on immediately adjacent land uses and those within one mile. The need to analyze impacts at a regional, national, or international level is an opinion of the commenter and is not supported by the County or CEQA Guidelines.

C1d-64 As discussed above, the analysis focuses on immediately adjacent land uses and those within one mile. The need to analyze impacts at a regional, national or international level beyond the scope of the FEIR is not supported by the County or CEQA Guidelines.

documenting the likely restrictions on pesticide use for surrounding agricultural operations would be wise.

C1d-66, cont.

2.4.1.2 Existing Agricultural Resources
State pesticide regulations prohibit discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. There are also regulations and label requirements that prevent or minimize "drift" during aerial applications. Drift is the airborne transportation of residual pesticides, during or after pesticide application, via aerial or ground spraying, onto adjoining properties or onto roadways, trails or other routes traveled, by the general public.

C1d-67

Comment: This new addition to the REIR underscores the inherent incompatibility of such a large residential project and the conduct of viable agricultural operations. Please demonstrate how State pesticide regulations will not hamstring agriculture in this region.

2.4.2.2 Issue 2: Land Use Conflicts
Guidelines for the Determination of Significance
Based on the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the project would have a significant impact if it:

Note: The following passage was struck from the original DEIR. If the same proposal for the LHR project still includes a school, the same concern stands. Proposes a school, church, day care, or other use that involves a concentration of people at certain times within ***one mile of an agricultural operation*** or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the project would likely occur and could result in conversion of agricultural resources to a non-agricultural use;

The report later goes on to deem the impact of the proposed LHR school as insignificant: "Because the project design locates the school site away from the project boundary (325-feet), and state regulations prevent aerial pesticide "drift" onto neighboring properties; indirect impacts associated with the proposed school would be **less than significant**. In addition, the future school site would include fencing and security gates to prevent unauthorized ingress or egress and eliminating associated trespass/vandalism conflicts."

C1d-68

Comment: *Regulations require schools to be further than 1 mile from agricultural operations. This school site is 325 feet from an existing operation. Avocado & Citrus are vulnerable to known and unknown (future) infestations. Inhibiting the freedom to spray pesticides, herbicides and fungicides could doom their operation or endanger the vulnerable population using the school site. Please provide more detailed studies concerning the proximity of "vulnerable" sites such as schools and agricultural operations from regional to international examples and the effects upon the surrounding agricultural operations and vice versa.*

Group residential or (GR) would include "Group Care" land uses with units for independent living, assisted living, and dementia care. With approximately 200 units within a 6.5-acre site, this land use type would be considered a sensitive receptor. The GR area borders off-site estate residential land uses to the east. The remaining three sides are internal to the project site: biological open space lies to the south; and SFS (age restricted single-family detached) is to the north and west. The nearest active agricultural operation to the GR would be approximately 2,400 feet to the southeast or 2,900 feet to the east. As shown on Figure 2.4-4, neither of these agricultural operations is subject to aerial spraying. Because of the distance between these land uses and the fact that no aerial spraying has historically occurred; **no significant impacts** are anticipated.

C1d-69

Comment: *Still, within 1 mile. This would inhibit aerial spraying if a future such agricultural operation were proposed for this area. As requested above, please justify why the County is not requiring LHR to consider possible future uses as well as past.*

Hazardous Materials Storage, p. 2.4-20 Such regulations would include an on-site ban on aerial pesticide spraying, restrictions on the types of fertilizers that could be used, and limitations on the types of equipment and hours of operation of maintenance activities. All pesticide and hazardous materials

C1d-70

C1d-65 The County does not contract with AFT to evaluate private project applications. The AFT did not provide a comment letter within the 45-day public review period for this project. Thus, this comment does not raise an environmental issue within the meaning of CEQA. Further, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

C1d-66 See Global Response: Agricultural Resources, Indirect Effects as well as the FEIR Appendix K, Section 3.2 which provide information about pesticide use relative to the proposed on-site land uses and the surrounding off-site agricultural operations.

C1d-67 See Global Response: Agricultural Resources, Indirect Effects for information relavnt to state pesticide regulations, aerial applications, "drift", the potential to cause indirect impacts through restrictions, and the mitigation measures and project design considerations proposed by the project.

C1d-68 The commenter's statement that regulations require schools to be further than one mile from agricultural operations is not accurate. As discussed in subchapter 2.7 of the FEIR, the California Education Code (CEC) establishes the law for California public education. The CEC requires that the DTSC be involved in the environmental review process for the proposed acquisition and/or construction of school properties that will use state funding. The CEC requires a Phase I ESA be completed prior to acquiring a school site or engaging in a construction project. Depending on the outcome of the Phase I ESA, a Preliminary Environmental Assessment and remediation may be required. The FEIR goes on to state "Moreover, prior to the siting of a school, the local education agency is required to consult with local officials to identify facilities within one quarter mile of the proposed site that might reasonably be anticipated to emit hazardous air emissions or handle hazardous materials, substances, or wastes. Where such facilities are present within one-quarter mile of a proposed school site, the local education agency is required to make a finding either that no such facilities were identified; or that they do exist, but the health risks do not or will not constitute an actual or potential endangerment of public health at the site or that corrective measures will be taken that will result in emissions mitigation to

C1d-68 (cont.)

levels that will not constitute endangerment. Therefore, based on conformance with the described requirements for hazardous materials, the project would result in less than significant impacts related to the location of the proposed school site." Lastly, FEIR Appendix K (bottom of page 72) discusses the agricultural uses within one-mile of the school; and discusses potential health concerns, the applicable regulations, and the features of the project design used to preclude significant impacts in Section 3.2.2.1.

C1d-69 As discussed in FEIR Appendix K Section 3.2.2, aerial applicators are required by law to use all precautions to prevent pesticide "drift" into a neighboring property; these are required regardless of the type of land use occurring on the adjacent parcel. As with schools, there are no existing regulations in place which would prevent group residential being placed within one-mile of active agriculture. As discussed in FEIR Appendix K Section 3.2.2.5, there are no records of aerial spraying occurring nearer than 2,900 feet; however, in the event that the nearest agricultural operation to the group residential site makes the decision to utilize aerial spraying in the future, the spraying would occur 600 feet from the boundary of the group residential site. Any other changes in land use beyond the decision to utilize aerial spraying (or not) would be speculative and analysis is not required.

C1d-70 The on-site retained agriculture would be maintained by the HOA as detailed in Part III of the Specific Plan.. Because of the nature of the on-site agricultural uses being located within a primarily residential neighborhood; the groves and other retained agriculture would be managed using organic principles and no aerial spraying would occur. Therefore, with respect to on-site agriculture, no impacts would result from the storage or use of hazardous materials or with "drift." Off-site hazardous materials use is addressed through regulatory compliance (see FEIR subchapter 2.4). See also, Global Response: Agricultural Resources, Indirect Effects.

storage, on- or off-site would be required to comply with the state requirements and the applicable regulations enforced by the County Agriculture Weights and Measures. Notwithstanding storage protection measures and regulatory compliance, **significant impacts** could occur along the AAs identified above (**Impact AG-12**).
Comment: *The restrictions upon proper cultural practices for grove management would endanger the viability of these LHR on-site agricultural operations. If these operations would cease (i.e. kill or damage the trees) because of these onerous restrictions, wouldn't the usefulness of these zones as barriers for this and other use conflicts be removed? Please study this possibility carefully and provide a respectful answer that this important matter deserves.*

C1d-70, cont.

Pathogens/Diseases, p. 2.4-20
Comment: *The shot-hole borer is currently moving towards San Diego County from the north. It is lethal to citrus trees and has no cure, only careful agricultural cultural practices to prevent and manage its spread. The general public knows little about its spread or prevention. This makes management of these and any potential future pests nearly impossible. Please provide a study, which compares its spread to agricultural operations from adjacent urban vs. rural and agricultural areas.*

C1d-71

Nighttime Lighting p. 2.4-20
Comment: *How could future possible agricultural lighting practices be affected by LHR? Please provide studies demonstrating various scenarios: effects of lighting incompatibilities from both directions.*
2.**4.3.1 Issue 1: Direct Conversion of Agricultural Resources, p. 2.4-23**
As discussed in the General Plan EIR, agricultural acreage within the County has been in decline since at least 1984 due to pressures on agriculture, such as high land values, urban/agricultural interface conflicts, and high economic costs (water costs). While the types of farming occurring in San Diego (small acreage - high value crops) allow San Diego farmers to continue economically viable operations; agriculture is a vital part of the San Diego County economy. Further, the cumulative loss of farmland is a concern to both the state and nation.

C1d-72

2.4.3.3 Issue 3: Indirect Conversion of Agricultural Resources, p.2.4-26
Cumulative impacts related to farmland conversion could also result from edge effects, including trespassing, pilfering of crops, and damaged farm equipment. The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming infeasible or, at least, heighten the attractiveness of selling other farms for development.

Comment: *The economic engine for this region has great potential, but is fragile. Dilution of actual land uses could further endanger the feasibility of the potency of this engine. Wouldn't it be wiser to encourage other uses that are compatible with agriculture instead of inhibitory ones such as the LHR project? Compatible uses could be: agriculture, solar wind generation, breweries and wineries, and other food-processing and production operations.*

C1d-73

Comment: *Considering the importance of agriculture to the entire region, could a study of agricultural vitality comparing the saturation of agricultural-compatible vs. agricultural-conflicting actual and potential land uses be undertaken?*

C1d-74

2.5 Biological Resources

RDEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP): Biological Resources

2.5.1.2 Vegetation Communities
The Biological Resources Report [the Report] identifies three sensitive plant species

C1d-75

C1d-71 By the commenter's admission, "little is known about its spread or prevention . . . makes management of these and any potential future pests nearly impossible." The agricultural components which would continue on the site after build-out would be managed by professionals hired by the HOA who would implement industry standard practices to prevent the spread of pests. Because of the unknown nature of this particular pest, the necessity of further studies at this juncture would be speculative, and further are not required pursuant to CEQA.

C1d-72 See Global Response: Agricultural Resources, Indirect Effects for information relevant to nighttime lighting and potential incompatibility impacts to adjacent agricultural operations. With regard to impacts on future residential uses, the combination of agricultural buffers, LBZs, fencing, and the two rows of trees (M-AG-2, 3, and 4) along the project boundaries that border an agricultural operation would serve to mitigate any potentially significant impacts to below a level of significance.

C1d-73 The first part of this comment restates a portion of the FEIR but does not raise an environmental issue within the meaning of CEQA. See Global Response: Agricultural Resources, Indirect Effects for information relevant to the edge effects mentioned in the first part of this comment. With regard to the statement about "wiser" uses than those proposed expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

C1d-74 See Global Response: Agricultural Resources, Indirect Effects for information relevant to a broad spectrum of agricultural compatibility-related issues as well as proposed mitigation measures and project design considerations. Given the depth and breadth of information provided in the FEIR, FEIR Appendix K, and the Global Response: Agricultural Resources, Indirect Effects, further studies comparing saturation of uses is not warranted and no further response is required pursuant to CEQA. However, this comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

present on-site: Engelmann oak, prostrate spine flower, and southwestern spiny rush. All three are on the County's List D of sensitive plant species and all three are reported as relatively small numbers of individuals. Do listed plants have to be represented on-site in large numbers to gain significance? Does not the incremental elimination of small numbers of individuals of a species, already judged to be very limited in number, amount to a significant loss?

C1d-75, cont.

The County's standard for significance of D list species is that on-site populations are significant if the project would impact the local long-term survival of a County List D plant [local in this case being defined as north San Diego County].

Is there quantitative data available to the County to know whether the population sizes found on-site are significant within the north San Diego County region? Such information would be crucial for determining long-term survivability.

If not, how is it determined that a local population is insignificant?

Aren't rare, threatened or species of concern logically less numerous in most plant formations?

C1d-76

The Report references a work by Reiser (2001) to justify the determination that the three species cited above are not populations that are regionally significant. Investigation of that reference reveals that Reiser's treatment of these species does not include population data for any of these species within the North San Diego County 'region'. Reiser's information lists 'known sites' where these species have been found in the past, but does not quantify the populations at each site, nor does Reiser offer any judgment about which, if any, of the known site populations are significant and which are not. Further, the Report seems to confuse species range with population size, suggesting that species with "broad" ranges are abundant and do not have locally significant populations. Is that the County's conclusion? Did the County compare the losses of such species on other project sites within north San Diego County to arrive at this conclusion? Or, does the County agree that a broad species range has no bearing on local population sizes within that range? And, does the County agree that a species' range is merely the geographical area within which 'local' populations of a species are generally found in a particular part of the year? And does the County agree that even species with broad ranges can have total populations that are small and so fragmented and dispersed [particularly by human habitation and transportation corridors] within that range, that the local populations may seem small but retain their significance?

C1d-77

The Report claims these three species are "abundant" without any data to support that claim. Reiser also does not offer an opinion, or any data, on what the parameters of a "significant regional population" are. Please explain how the Report came to the conclusion that these three species have insignificant, on-site populations based on the work of Reiser (2001). What other references were used to confirm a lack of significance? Were population size studies conducted on-site outside of the brief, and ill timed, surveys referenced in Table 1 of the Report?

C1d-78

From Table 1 of the Report, it appears that about 50 man-hours of effort were expended in search of rare plants on the 608-acre site. However, that total is diluted by the fact that, except in one instance on 11 June 2011 where no time interval was recorded, all the rare plant surveys also involved other survey efforts such as general biology, least Bell's vireo,

C1d-79

C1d-75 and C1d-76

Plant species on the County's List D are considered plants of limited distribution and are uncommon, but not presently rare or endangered. Therefore, significance of impacts is based on the estimated population size found on-site compared to the estimated regional population (the entire range of the particular species). A larger population in relation to the regional population would generally indicate a greater significance. While there is not quantitative data available on the population sizes of these species within the region, the FEIR relies on the best available scientific literature available that defines the species range and occurrence. The County agrees that "rare, threatened or species of concern are less numerous in most plant formations." The three subject plant species are not considered rare or threatened, and the current concern for these species is not at a level that warrants significance for the project's impact to these species.

More specifically, development of the project would not directly impact any on-site Engelmann oak or southwest spiny rush because the on-site species would be protected within the project's biological open space. The project would result in impacts to prostrate spineflower. These impacts were evaluated and were determined to be less than significant because (1) the number of individuals being affected is low, and (2) available data indicate this plant is relatively abundant in its range. In addition, the prostrate spineflower observed on-site was located within southern mixed chaparral habitat and 26 acres of this appropriate habitat for the species would be preserved on-site within biological open space easements, with another 24.5 acres of off-site habitat preservation required as a condition of the project.

C1d-77 The determination of a significant population for a particular sensitive plant species was made using the best available information which included the Reiser publication, draft North County MSCP, species ranges, estimated population observed on the property, and other factors. The use of a species range along with specific habitat requirements for a species is useful in the determination of a signficant population, but not necessarily the only factor. While there is agreement with the points made by the commentor regarding a species range, the range of a particular species is more than a geographical area it is also the distribution of suitable habitat within that area and known occurrences of the species. In addition, the sensitivity level for the species in question helps in the determination of a significant population, for example, all populations of a listed endangered and/or threatened species would be considered significant.

C1d-78 Please see Response to Comment C1d-77 for information responsive to the comment Population sizes on the site were estimated based on observations made during field surveys. No additional population size studies were conducted or are known for this area.

C1d-79 The calculation of survey effort cannot be made by simply dividing the numbers of survey hours by the total acreage of the site. Surveys for rare plants were concentrated in those areas containing suitable habitat for the plant species. Significantly less survey time was spent in active agricultural areas, which make up a large acreage of the site, as these areas have been disturbed (i.e., no native habitat, native soils are disturbed, etc.) for decades and have an extrememly low probability of supporting any native species. Additionally, field efforts can cover mutiple tasks because some surveys take up a small portion of the day, after which the biologist is free to shift to other survey tasks.

and burrowing owl surveys. One can reasonably conclude that far fewer man-hours than 50 were actually devoted to looking for the anticipated rare plants. Were all portions of the site surveyed or just those areas expected to have rare plant populations? Allowing that all 50 man-hours listed in Table 1 were completely devoted to rare plant surveys, can the County explain what level of confidence they have in the results of surveys that were conducted over 608-acres that spread approximately 2-miles north to south and a mile east to west by so few man-hours? [50 man-hours / 608-acres = less than 5-minutes per acre]. C1d-79, cont.

Also, of the five dates listed for rare plant surveys in Table 1 of the Report, the earliest in the critical spring growth season was May 27, 2011 with the others conducted on June 2, 3, 8, & 11, 2011. For *Chorizanthe procumbens*, June is the end of the flowering season during years with average rainfall [P.A. Munz, *A Flora of Southern California*, 1974]. The years 2011 and 2012 were drier than normal and likely would have cut short the flowering period and life cycle for prostrate spinyflower and other annual plants. Can the County explain what level of certainty they have in rare plant surveys of annual plants that are conducted at a time of year when most annual plants have already shriveled and died or remained dormant rather than germinate under poor rainfall conditions? Surveys that expect to find rare annual plants would more likely be successful in the period February to April in years with average rainfall, but, especially in very dry, drought years like the past several. In fact, according to Table 1 of the Report, only 114 man-hours of the total of 304 man-hours recorded for all field surveys were conducted in that February to April time frame. How can the County have confidence in fieldwork done at a time that is at the extreme margin of the life cycle of target annual plants and have certainty that the surveys dependably represent the presence, density and significance of target populations? C1d-80

2.5.2 Analysis of Project Impacts and Determination of Significance
2.5.2.1 – Special Status Species
The Biological Resources Report [the Report] of the RDEIR lists 13 federal/state species of special concern or Group 1 species of animals that would be impacted by the development of the Lilac Hills Ranch project [the Project] ranging from orange-throated whiptail lizards to southern mule deer. Reptiles and small mammals are judged to be at greatest risk for direct impact because they move more slowly and likely would suffer greater losses during construction activities, while larger mammals and birds are more mobile and could possibly escape to somewhere else more easily. Is the RDEIR saying that reptiles, amphibians and small mammals would likely be sacrificed for this Project given their relative immobility? C1d-81

What are the population densities of amphibians, reptiles and small mammals that are likely to be extirpated by construction operations? C1d-82

To where would birds and larger mammals be dispersed? C1d-83

What are the territorial ramifications and chances of survival for individuals of these displaced or relocated species? C1d-84

For some of the anticipated species that were not observed during the directed surveys, e.g. the coastal California gnatcatcher, it appears that the timing of the directed surveys took place during the less than optimum periods of July and August, the extreme end of the season. Although still within the survey guidelines, the surveys were conducted during a very dry year, which minimizes the chance of sighting such species on-site at that time of C1d-85

C1d-80 Surveys for rare plants were part of every field visit. Plant species observed were documented over the entire survey period starting in February and ending in July 2011 so that the entire blooming season for sensitive plant species was covered. The entries in Table 1 that refer to a rare plant survey came later in the season because at this point suitable habitat areas were being revisited to catch the species that bloom in late spring-early summer. Although 2011 was drier than normal, the plant species observed that season did not appear to show the effects of a prolonged drought as the list of plant species observed, including senisitive plant species, was comprehensive.

C1d-81 and C1d-82
Due to the mobility of reptiles, amphibians, and small mammals, the FEIR discloses that these lower mobility species have a greater chance of being impacted by construction activities. The population densities of amphibians, reptiles, and small mammals that may be impacted by construction operations are not known, but based on population estimates for these species, founded on observations made during numerous site surveys, and the potential for animals to escape impact, losses are anticipated to be relatively low numbers.

C1d-83 Birds and larger mammals would disperse to adjacent undisturbed areas. The chances for survival of birds, reptiles, amphibians, and small mammals displaced by the construction activities is anticipated to be high as they are mobile enough to find habitat to support them. The chances for survival of larger mammals (e.g., deer, coyote, etc.) displaced by construction activities depends on their ability to find suitable areas adjacent to the project site large enough to support them. Currently, there is enough undisturbed area adjacent to the project site that survivorship of larger mammals displaced would be considered moderate to high.

C1d-84 Please see response to comment C1d-83 above.

C1d-85 The coastal California gnatcatcher is a resident species and detectable at any time of the year.