FINAL ENVIRONMENTAL IMPACT REPORT

San Diego County General Plan Update
DPLU Environmental Log No. 02-ZA-001
State Clearinghouse (SCH) #2002111067

COMMENT LETTERS AND RESPONSES TO COMMENTS ON THE DRAFT EIR

LOCAL AGENCIES

Lead Agency:

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123
Contact: Devon Muto, Chief of Advanced Planning

October 2010

List of Commenters – Local Agencies

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L 10	Sweetwater Authority
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Comment Letter L 1, Helix Water District

Helix Water District

of excellence in public service

7811 University Avenue
La Mesa, CA 91942-0427
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SEP 2 '09 PM 2

August 31, 2009

Devon Muto, County of San Diego
DPLU, 5201 Ruffin Road, Suite B
San Diego, California 92123

Sent by email to: gpupdate.DPLU@sdcounty.ca.gov

RE: **COMMENTS ON THE GENERAL PLAN UPDATE DRAFT EIR**

L1-1. Helix Water District (District) staff has reviewed the General Plan Update Draft EIR proposed by the County of San Diego and has the following comments.

L1-2. 1. The District requests that the District owned land be amended in the Environmentally Superior Alternative (and other sections) from: the "*Agricultural area along El Monte Road and the San Diego River was SR10 and shifted to RL40 to reflect San Diego River floodplain, reduce development pressure for agricultural area, and reflect biological sensitivity*", to reflect that the District owned land is subject to refinements for proposed uses such as a Golf Course or a water recharge/sand mining/habitat restoration project and should reflect "Area Subject to Further Refinements" and "Public Semi-Public Facilities".

L1-3. 2. District owned Lake Jennings Water Treatment, Campground, and Reservoir properties in Lakeside are included within the additional land use designations in the General Plan Update as open Space-Conservation, and Open Space-Recreation but should reflect: "Area Subject to Further Refinements" and "Public Semi-Public Facilities" to be consistent with the actual permits being currently processed or in place. The District has designed facilities for this land and although not subject to county or city building or zoning codes for implementation of service-related facilities, the District must comply with numerous federal and state regulations, including the federal Endangered Species Act (ESA) and the Natural Community Conservation Planning Act (NCCPA). The JWA NCCP/HCP will serve as a multiple species HCP pursuant to Section 10(a) of the ESA and an NCCP pursuant to Section 2800 et seq. of the California Fish and Game Code, known as the NCCPA.

Comment Letter L 1, Helix Water District (cont.)

L1-4. 3. District owned Lake Cuyamaca Reservoir and the old Fletcher Dam (APNs 288-120-03, 04, 06 and 16; 331-060-05; and 331-050-08) properties in Ramona are included within the additional land use designations in the General Plan Update as Open Space-Conservation, and Open Space-Recreation should reflect: "Area Subject to Further Refinements" and "Public Semi-Public Facilities" .

If you have any questions, please contact me at 619-667-6275.

Sincerely,

Lucy Galvin, MAI, SRWA
Senior Right of Way Agent / Environmental Analyst
Helix Water District
7811 University Avenue
La Mesa, CA 91941-4927

Cc: Carlos Lugo, Tim Smith, and Steve Geitz, HWD

Responses to Letter L 1, Helix Water District

L1-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L1-2 The County appreciates the District's request. The County will accommodate the District's request by changing the designation of the reference area to “Federal, State, and Local Agency Lands” on the land use map that is recommended to the Board of Supervisors. A revision to the EIR is not necessary because the land owned by the commenter does not fall under the jurisdiction of the County of San Diego; therefore, any actions taken on the land by the commenter would require a separate CEQA review.

L1-3 The County appreciates the District's request and will accommodate it by changing the designation of the referenced area to “Federal, State, and Local Agency Lands” on the map that is recommended to the Board of Supervisors.

L1-4 Refer to response to comment L1-3 above.

Comment Letter L 2, Local Agency Formation Commission (LAFCO)

LAFCO
San Diego Local Agency Formation Commission
1600 Pacific Highway • Room 452 • San Diego, CA 92101
(619) 531-5400 • FAX (619) 557-4190
Website: www.sdlafco.org

August 31, 2009

Devon Muto
County of San Diego
Department of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123-1666

SUBJECT: Notice of Availability of a Draft Environmental Impact Report for the San Diego County General Plan Update (Log No. 02-ZA-001; SCH No. 2002111067)

Dear Mr. Muto:

L2-1. Thank you for allowing the San Diego Local Agency Formation Commission (LAFCO) to provide comments on the above referenced project. LAFCO is empowered by the California State Legislature with discretionary authority over proposed changes to local government organization, extension of municipal services, and any associated sphere of influence actions. LAFCO is directed to exercise its discretionary authority in a manner that encourages orderly development and growth while fulfilling many regional priorities, such as accommodating additional growth within, or through the expansion of local agency boundaries. LAFCO is also required to consider the impact that proposed jurisdictional changes may have on providing necessary governmental services and housing for persons of all incomes. We offer the following comments:

Section 2.16 *Utilities and Service Systems*

Groundwater Dependent Water Districts (pages 2.16-10 to -11)

L2-2. This section should be revised to reflect that the Borrego Springs Park Community Services District was consolidated with the Borrego Water District by LAFCO in December 2008.

Section 2.9.1.3 *Spheres of Influence*

L2-3. This section (page 2.9-20) should be corrected to state that "SOI are required to be ***reviewed and*** updated, ***as necessary***, every five years...." The Government Code Section for this statement is 56425(g) and should be cited as a footnote.

Spheres within San Diego County (page 2.9-21)

L2-4. This section should be clarified to reflect the correct nomenclature regarding spheres of influence:

- A ***larger-than-agency*** sphere indicates territory outside of the current jurisdictional boundary that is projected to receive services from the subject agency within the next 10-15 years;

Comment Letter L 2, Local Agency Formation Commission (LAFCO) (cont.)

Mr. Muto
Page 2
August 31, 2009

L2-4. cont.

- A ***zero*** sphere is a transitional designation that indicates the subject agency's services will ultimately be provided by another agency;
- A ***coterminous*** sphere indicates that there is no anticipated need for the subject agency's services outside of its existing boundaries, or there is insufficient information to support inclusion of areas outside the agency's boundaries at the time of the sphere establishment or update;
- If more than one agency appears equally qualified to serve an area, and if fiscal considerations and community input do not clearly favor a specific agency, an ***overlapping*** sphere may be designated; and
- If territory within an agency's service area does not need all of the services of the subject agency, a ***service-specific*** sphere may be designated.

Local Agency Formation Commission (LAFCO) (page 2.9-22)

L2-5. This section should be corrected to state that Government Code Section 56000 (et seq.) is titled the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

L2-6. This section should also be revised to reflect the additional Municipal Service Review and Sphere of Influence Updates that have occurred since the referenced North County Inland MSR was completed in September 2003.

Sphere of Influence (SOI) (page 2.9-33)

L2-7. It should be noted that a prerequisite for inclusion in a city sphere is that the subject territory is within the General Plan of the affected city. With this prerequisite in mind, the statement that *"...Lemon Grove did not establish land uses for its SOI..."* should be corrected.

L2-8. While this section includes a discussion of the differences between the existing City land use designations for their respective sphere areas and the proposed County land use designations for the same territory, the cited policies for the County Land Use Element would indicate that these land use differences should be addressed through the County's General Plan Update process. In many cases, the Cities have based the land use planning designations within their respective sphere areas on existing infrastructure capacities and capabilities that are not considered by the County's planning efforts. Using the General Plan Update to establish transitional areas in concert with the existing land use designations of the adjacent cities will reduce potential jurisdictional controversies and enable the efficient extension of government services in the future.

Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409.

Sincerely,

ROBERT BARRY, AICP
Local Governmental Analyst

RB:trl

Responses to Letter L 2, Local Agency Formation Commission (LAFCO)

L2-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L2-2 The County appreciates and acknowledges this updated information that the Borrego Springs Park Community Services District was consolidated with the Borrego Water District in December 2008. However, existing conditions provided in the DEIR describe conditions on or around April 2008, which is when the Notice of Preparation was circulated. As such, no revisions were made to the DEIR in response to this comment.

L2-3 The last sentence of DEIR Section 2.9.1.3 Spheres of Influence has been revised as recommended.

L2-4 The County appreciates the clarifying information to DEIR Section 2.9.1.3 Spheres of Influence. The section has been revised to replace the last paragraph with the following, as recommended in the comment:

"There are several designations associated with SOI, which include:

- A ***larger-than-agency*** sphere indicates territory outside of the current jurisdictional boundary that is projected to receive services from the subject agency within the next 10-15 years;
- A ***zero*** sphere is a transitional designation that indicates the subject agency's services will ultimately be provided by another agency;
- A ***coterminous*** sphere indicates that there is no anticipated need for the subject agency's services outside of its existing boundaries, or there is insufficient information to support inclusion of areas outside the agency's boundaries at the time of the sphere establishment or update;
- If more than one agency appears equally qualified to serve an area, and if fiscal considerations and community input do not clearly favor a specific agency, and ***overlapping*** sphere may be designated; and
- If territory within an agency's service area does not need all of the services of the subject agency, a ***service-specific*** sphere may be designated."

L2-5 As recommended, the following has been added to the first sentence of the Local Agency Formation Commission subsection of DEIR Section 2.9.2.1 State after "California Government Code Section 56000":

"(et seq.), titled the Cortese-Knox-Hertberg Local Government Reorganization Act of 2000"

L2-6 DEIR Section 2.9.2.1, under the LAFCO heading, was amended as recommended with the following Municipal Service Reviews and Sphere of Influence Updates completed since 2003: Borrego, County Sanitation Districts, Southern San Diego County Water and Sewer Service, and Agencies Providing Floodwater and Sewage

Responses to Letter L 2, Local Agency Formation Commission (LAFCO) (cont.)

Control, Waterworks Construction, and Groundwater Management, Protection, and Exploration in the Tijuana Watershed.

L2-7 The second paragraph under the Sphere of Influence heading in DEIR Section 2.9.3.2 Issue 2: Conflicts with Land Use Plans, Policies, and Regulations has been revised to indicate that the SOI for Lemon Grove does not extend beyond the city boundaries.

L2-8 The County appreciates this comment and concurs. While no changes were made to the DEIR, draft General Plan Land Use Element Policy LU-1.7, Relationship of County Land Use Designations with Adjoining Jurisdictions, has been amended to include the following:

"Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities."

Comment Letter L 3, Ramona Municipal Water District

AUG 20 '09 PM

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, California 92065-1599
Telephone:
(760) 789-1330

August 17, 2009

File No. 120.01

Mr. Gibson
Director
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

SUBJECT: SAN DIEGO COUNTY GENERAL PLAN UPDATE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) – RAMONA MUNICIPAL WATER DISTRICT COMMENTS

Dear Mr. Gibson,

L3-1. The Ramona Municipal Water District (RMWD) has completed its review of the San Diego County's General Plan Update Draft Environmental Impact Report (DEIR) and believes there are significant impacts of the San Diego County's General Plan Update to the RMWD water, sewer and fire protection services that are not sufficiently addressed or mitigated. The attached document provides RMWD's detailed comments on the DEIR regarding water and sewer services. Fire protection will be addressed in a separate letter to you.

The following paragraphs highlight a few of the more significant impacts to water and sewer service.

L3-2. 1. The Santa Maria Sewer Service Area (SMSSA) can only support 1,400 more housing units. The SMSSA, which will apparently absorb the bulk of the projected growth in the community planning area, does not have adequate capacity for the number of housing units connected today (4087 housing units). Expansion of the SMSSA facilities is limited to adding 1,400 housing units compared to the approximately 7,000 additional housing units determined from the projections in the General Plan Update. The reason for this limitation is because of the lack of land for effluent disposal due to the County acquiring land committed to open space, park lands and the MSCP. Without more land for spray fields and wet weather storage the number of housing units in the General Plan should be reduced to 1,400. The General Plan and DEIR do not address how this impact on the SMSSA will be mitigated.

Comment Letter L 3, Ramona Municipal Water District (cont.)

L3-3. 2. The potable water system can only import approximately 20 million gallons a day (MGD) which would represent an increase of approximately 6,700 housing units whereas the General Plan growth projection is approximately 8,600 housing units. The additional 1,900 housing units would require construct of new water treatment plants, pump stations, pipelines, and potentially significant modifications to the County Water Authority supply pipelines. The RMWD does not believe the land for all these facilities is available and if it is the financing may not be feasible. The General Plan and DEIR need to address how this impact will be mitigated.

L3-4. 3. The DEIR mentions that impact to the regions wastewater facilities would cause a significant impact and that specific implementation programs are identified as mitigation, but does not address any mitigation for RMWD. As such, the DEIR should be revised from "Less than Significant Impact" to "Significant Impact" or identify what the mitigation is for RMWD. One possible option for mitigation would be to allow a dual use of the County's property or developer dedicated open space to allow the RMWD to use it for wet weather storage and as spray fields.

L3-5. 4. The groundwater analysis completed in the DEIR and the Ramona Community Plan assumes that development within the San Diego County Water Authority (SDCWA) service area will be supplied with imported water and groundwater impacts will be minimized. Of the approximately 3,300 well permits issued in the Ramona Community Planning Area since 1974, the majority have been within the RMWD boundary. As the cost of imported water increases the trend is for developments in RMWD to use groundwater has also been on the rise. Without a County Policy restricting or quantifying future well permits, the groundwater analysis is incomplete for groundwater basins that are located in rural areas also served by an SDCWA member agency. This should be considered a significant impact and specific mitigation discussed.

L3-6. RMWD requests that the DEIR not be accepted by the County of San Diego until all issues raised by RMWD are addressed.

If you have any questions or comments about the issues we have addressed please feel free to contact me at: 760-788-2249 or via email at tstanton@rmwd.org.

Sincerely,

Timothy N Stanton, P.E.
District Engineer

Cc: Dianne Jacob
Devon Muto
Attachments

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-7.	1	1	1	The proposed General Plan Update would: 2. Promote sustainability by locating new development near existing infrastructure, services, and jobs.	The General Plan Update may locate new development near existing infrastructure, has not confirmed that the infrastructure has capacity to serve the additional development. In rural communities, such as Ramona, in many cases the infrastructure was never sized to accommodate the water and sewer demands projected by the General Plan Update. There is a large disparity between what the infrastructure will support and what the County assumes it will support.
L3-8.	2	1	2	Minimize public costs of infrastructure and services and correlate their timing with new development.	The costs to developers to build in areas with inadequate infrastructure may be substantial. Even without the densities proposed by the County, existing developers are walking away from projects after finding out the cost for improvements to water, sewer, and roads. This may increase the demand for wells, septic tanks, and package wastewater treatment plants within the Ramona CPA.
L3-9.	3	1	7	In order to reduce competing interests for land, the General Plan Update shifts development densities to the northwest and southwest areas of the County, where water and public services can be made available to support the population.	See response to comment #1.
L3-10.	4	1	22	Some of the factors considered during the mapping process included the following: • Proximity to existing infrastructure and services	See response to comment #1.
L3-11.	5	1	29	Between 2008 and build-out, the following western communities would experience large increases in housing units as indicated: Alpine (56.3 percent), Bonsall (54.2 percent), Fallbrook (35.4 percent), North County Metro (86.2 percent), Otay (44,851.2 percent), Rainbow (90.2 percent), Ramona (52.5 percent), and Valley Center (108.5 percent).	The infrastructure in Ramona cannot handle a 52.5 percent increase in growth without significant replacement and upsizing of facilities. The pattern of growth has historically been a few parcels at a time with no one large developer with enough resources to construct the infrastructure necessary. Developers may find themselves without the ability to meet fire flow requirements, purchase capacity in wastewater treatment systems, or meet traffic requirements without a substantial investment that may exceed their project's net worth. This may increase the demand for wells, septic tanks, and package wastewater treatment Plants within the Ramona CPA.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-12.	6	1	36	Major use permits are not directly implemented by the existing General Plan although they must comply with its goals and policies.	While MUPs are site specific, compliance with goals and policies alone is inadequate. MUPs shall not be approved without complete analysis of existing infrastructure capacity and ability to serve the demands of the project.
L3-13.	7	1	43	Ramona forecasted housing units 18,205 (Existing 11,997).	The sewer treatment and disposal system in the Santa Maria Sewer Service Area (SMSSA) can only accommodate another 1,400 equivalent dwelling units (EDUs). The RMWD does not have the ability to accommodate any higher capacities due to a lack of available land for spray fields to meet regulatory requirements for guaranteed disposal sites. Recycled water customers are not considered guaranteed disposal since at any time they may cease to exist and stop taking recycled water. Also see response in comment # 23.
L3-14.	8	1	44	Ramona forecasted population 55,500 (Existing 36,753).	See response to comment #7
L3-15.	9	1	Figure 1-3	Proposed Land Use Map	See response in comment #7
L3-16.	10	2.4	20	Table 2.4-1, Total Habitat Impacts by CPA and Sub region, provides the total acreage of habitat that would be impacted as a result of development accommodated by the General Plan Update. Table C-3, Impacts to Vegetation Communities by CPA and Sub region, located in Appendix C of this EIR, presents the estimated acreage of each habitat in each planning area that would be potentially impacted. As shown in these tables, the areas with the greatest total acreage impact are ... Ramona CPA (15,289 acres) . . . proposed for substantial growth under the General Plan Update; therefore, these areas would result in large acres of impacts to habitat from planned future development.	The RMWD requires approximately 1 acre of land as a guaranteed disposal site for every four EDUs that connect to sewer. Based on the growth planned for under the draft 2020 General Plan, this may result in **SIGNIFICANT IMPACTS** and the need for substantially increased amount of land for disposal of wastewater effluent. These facts are not identified or addressed in the General Plan Update.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-17.	11	2.4	Figure 2.4-2	ADOPTED AND DRAFT MSCP CORE AND LINKAGE AREAS	The Core Resources Area for Ramona appears to extend through wastewater spray fields owned and operated by the RMWD on Rangeland Road north of Highland Valley Road. The RMWD property shouldn't be considered to be a part of the County's MSCP as it is the only area capable of meeting the RMWD's requirement for guaranteed disposal of wastewater effluent.
L3-18.	12	2.4	Figure 2.4-3	ESTIMATED VEGETATION IMPACT	The estimated vegetation impact map shows the RMWD spray fields on the west side of Rangeland Road (APN 277-050-22) as a 100% impact, but spray fields on the east side (APN 277-050-25,26) are listed as 5 acres/dwelling unit. The map should correctly show 100% impact for the east side of Rangeland Road as well.
L3-19.	13	2.7	11	Ramona Airport: The airport is located approximately two miles west of the Ramona Town Center area, about 27 miles northeast of downtown San Diego in the Santa Maria Valley.	Please add to the description that the Ramona Municipal Water District's evaporation terraces and spray fields are located directly to the west of the runway.
L3-20.	14	2.8	37	Unincorporated areas excluded from the General Plan Update Groundwater Study include the western region of the County within the SDCWA service area, which is largely supplied with imported water from member agencies of the SDCWA	The groundwater study assumes that all development within the SDCWA boundary will receive water service from a SDCWA member agency. It doesn't address the fact that many customers already within the RMWD boundary use well water as their primary supply and many residents have wells to supplement their domestic water service. With costs for water connections increasing within the region, many developers have found it more cost effective to dig wells in lieu of constructing water pipelines and paying capital improvement fees for public water. Unless the County declares a moratorium to issuing well permits, that trend is likely to continue. Also see "demand offset programs" in response to comment on page 2.16-6 below.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-21.	15	2.8	Fig 2.8-9	Gower, Ramona, and Lower Hatfield basins stop at RMWD boundary.	The hydrologic basins on the map stop at the RMWD boundary, but realistically many basins extend into the SDCWA boundaries where demands also occur. Are those demands accounted for in the percentage of groundwater remaining in storage at build out? Likewise, is the amount of groundwater in storage basin-wide or just for the areas outside of the SDCWA boundary? (ie if 78% remains in storage at build out, is that just the water stored outside of the SDCWA boundary?).
L3-22.	16	2.9	16	Ramona CPA was represented by the Ramona Planning Group during the General Plan Update planning process.	The RMWD would point out that the planning process does not appear to include our agency's ability to provide services to the population projected in the County's General Plan Update.
L3-23.	17	2.9	16	Development of the southern and eastern portions of the planning area is constrained due to steep slopes.	It should be noted that large portions of Ramona have development constraints due to biological open space easements acquired by the County of San Diego.
L3-24.	18	2.9	21	The California Aeronautics Act, established by the California Department of Transportation – Division of Aeronautics, requires the preparation of airport land use compatibility plans (ALUCPs).	*No comment*
L3-25.	19	2.9	21	The legal framework in which California cities and counties exercise local planning and land use functions is provided in the California Planning and Zoning Law Sections 65000 through 66499.58.	*No comment*
L3-26.	20	2.9	31	ALUCPs are plans that guide property owners and local jurisdictions in determining what types of proposed new land uses are appropriate around airports.	*No comment*
L3-27.	21	2.9	31	However, the Safety Element of the General Plan Update includes Policy S-15.1 that would require land uses surrounding airports to be compatible with the operation of each airport.	*This should be clarified that it refers to new land use not existing land use.*
L3-28.	22	2.9	34	California Planning and Zoning Law Section 65067 mandates coordination of local efforts within a region to help prevent conflicts among land use plans, policies and regulations.	The RMWD would point out that the planning process did not include our agency or address our ability to provide services to the population projected in the County's General Plan Update.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-29.	23	2.12	23	SANDAG Population Forecast: Ramona forecasted population 55,024 (Year 2000 was 33,940).	The RMWD's Santa Maria Sewer Service area can only serve approximately 1.47 MGD at build out based on spray field areas currently available. Current customers require 1.14 MGD. Only 1,400 additional EDUs (or housing units) can be accommodated. The RMWD's water system is currently deficient in water storage and pipeline capacity. Additional storage tanks and pipelines will need to be constructed by developers prior to meeting the projected population forecast. With the recent SANDAG revised population forecat, the projections shown in the GP are significantly understated. SANDAG now forecasts a 39.7% increase in the County population by 2050 with incremental increases in intervening years. Adding the accompanying "density shifts" from the eastern part of the County to the western communities. This creates **SIGNIFICANT IMPACTs** on communities such as Ramona. The GP population/housing forecast contain large disparities and significant inconsistencies. Given the impact of the new SANDAG forecasts and the more accurate current existing numbers, Tables 2.16.-1 and 2.16-4 appear to be more accurate forecasts and strongly support the growth impact on infrastructure as a **SIGNIFICANT IMPACT**.
L3-30.	24	2.13	3	The Ramona Municipal Water District, located near the geographical center of the San Diego County, was formed on August 15, 1956, as a publicly owned special district. The District provides water, sewer, fire protection, emergency medical services and park services to the public. The District's boundaries extend approximately 75 square miles. The Fire Department was managed by the District until July 1, 1993, when the Board entered into a cooperative fire protection agreement with CAL FIRE to provide the fire and paramedic services. They operate out of three stations and provide EMT/ paramedic level service.	The Fire Department is still managed by the RMWD. RMWD has a year to year contract with CAL FIRE to operate the RMWD fire department under the direction of the RMWD General Manager.
L3-31.	25	2.13	29	Policy S-6.1: Water Supply. Ensure that water supply systems for development are adequate to combat structural and wild land fires.	The existing water system in Ramona was not designed to meet current Fire Code. The water supply systems are currently deficient in water storage, pipeline capacity, and the ability to meet fire flow requirements under the current Code.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-32.	26	2.13	29	Policy S-6.3: Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.	No comment. The fire department staff will be addressing the fire protection component of the General Plan Update in a separate response.
L3-33.	27	2.13	28	Policy LU-1.6: Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met: ... Public facilities and services can support the expansion without a reduction of services to other County residents; and	The existing infrastructure in Ramona in many cases cannot support planned Village Expansion without impacting existing customers. Prior to a development being allowed to connect to water and sewer, facilities they may be required to be significantly upsized or extended prior to a connection to public utilities being allowed.
L3-34.	28	2.13	38	Ramona MWD 2004 Housing = 7,768, Existing population = 21,947, Proposed housing= 13,052, Proposed population =36,759	This is inconsistent with other projections. Assuming Ramona CPA boundary is different from Ramona MWD, but numbers appear to be significantly different.
L3-35.	29	2.13	42	Ramona SDSD Beat 2004 Housing = 11,528, Existing population = 35,383, Proposed housing= 17,561, Proposed population =53,854.	This is inconsistent with other projections. Assuming Ramona CPA boundary is different from Ramona MWD, but numbers appear to be significantly different.
L3-36.	30	2.14	15	As shown in this table, the CPAs most likely to experience substantial population growth under the proposed project include North County Metro (population increase of 39,441 persons); Valley Center (population increase of 21,051 persons); Ramona (population increase of 18,747 persons); . . .	See response to comment #23
L3-37.	31	2.14	15	The following CPAs have an existing acreage deficiency in local park and recreation needs: Fallbrook (384 acre deficiency); Ramona (170 acre deficiency) . . .	No comment.
L3-38.	32	2.14	29	Ramona Wellfield Park operator is stated to be County DPR	The Ramona Municipal Water District owns and operates the Ramona Wellfield Park.
L3-39.	33	2.14	32	Ramona Grasslands and Santa Maria Creek listed as County Owned Preserve	The County's acquisition of this property has severely restricted the RMWD's ability to expand sewer service beyond 1.47 MGD or more than 1,400 EDUs. Without additional sewer spray field and wet weather capacity the RMWD cannot meet the County's projected 2020- 2050 population, thus having a **SIGNIFICANT IMPACT.**
L3-40.	34	2.16	2.16	Issues 1 and 2: Less than significant impact	Should be changed to **SIGNIFICANT IMPACT**
L3-41.	35	2.16	2	MWD provides approximately 71 percent of the total water supply for the entire San Diego County, including incorporated areas.	The San Diego County Water Authority's has historically, imported 75 to 95 percent of the region's water supply. Prior to the IID transfer Metropolitan was the only supplier to the SDCWA.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-42.	36	2.16	6	To help achieve the required reduction in regional water use, the SDCWA Board also immediately declared a Level 2 "Drought Alert" condition	. No comment.
L3-43.	37	2.16	8	Ramona MWD covers 45,796 acres and has approximately 8,839 connections.	The RMWD has 9,477 connections.
L3-44.	38	2.16	8	Ramona MWD operates 250 miles of pipeline, 13 lift stations, and the Lake Ramona Reservoir, which has a storage capacity of 12,000 AF.	There are 272 miles of pipeline and Lake Ramona has a storage capacity of 13,400 AF. The RMWD operates 13 water "pump stations". The term "lift station" refers to sewer pumps.
L3-45.	39	2.16	8	RMWD also has one treatment facility, the John C. Bargar Water Treatment Plant. This plant has a treatment capacity of 5.3 mgd.	The Water Treatment plant is currently not in operation and although rated at 5.3 mgd has been unable to operate above 3 MGD as a result of recent changes in drinking water standards.
L3-46.	40	2.16	23	Ramona MWD is an independent sanitation district authorized to provide sewer service to two areas: 1) San Diego Country Estates, which utilizes the San Vicente Wastewater Treatment Plant; and 2) the Ramona Town Center area, which utilizes the Santa Maria Wastewater Treatment Plant.	The term "sanitation district" is not accurate. Revise to read "The Ramona MWD is authorized to operate two sewer service areas:"
L3-47.	41	2.16	23	It operates 100 miles of sewer pipelines, six pump stations and conveys wastewater locally to the Santa Maria and San Vicente Wastewater Treatment Facilities.	It operates 78 miles of sewer pipelines, five lift stations that convey wastewater locally to the Santa Maria and San Vicente Wastewater Treatment Facilities.
L3-48.	42	2.16	23	The pass-through capacity for each facility is 1.75 mgd with an average flow of 1.45 mgd.	The rated plant capacity for Santa Maria is 1.00 MGD and 0.8 MGD for San Vicente. The annual moving average flow rate is 0.81 MGD for Santa Maria and 0.61 for San Vicente. However Santa Maria WWTP exceeded it rated capacity on several occasions during the last 10 years and in 2005 experiences 30-day moving average flow of 1.14 mgd.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-49.	43	2.16	23	Groundwater Dependent Water Districts	The section does not address the water districts that have a large number of well users within the basins. Growth in these areas appear to have higher density zoning proposed since they are adjacent to existing water facilities. It does not account for a number of those parcels subdividing and pursuing well water in lieu of a public water supply since it may be a much more cost effective option for water service in the future. The General Plan Update should address groundwater resources in areas served by a SDCWA member agency or adopt a policy defining limits to new wells constructed within SDCWA boundaries and analyze hydrologic capacities based on those policies.
L3-50.	44	2.16	54	Based on Appendix G of the CEQA Guidelines, the proposed County General Plan Update would have a significant impact if it would result in a determination by the wastewater provider which serves or may serve the project area that it has inadequate capacity to service the project's projected demand in addition to the provider's existing commitments.	The RMWD has inadequate wastewater disposal capacity in the Santa Maria Sewer Service Area to serve the Project's projected demand and as such the County's General Plan Update should be considered to have a **SIGNIFICANT IMPACT** as it pertains to the Ramona CPA.
L3-51.	45	2.16	54	Twenty-five wastewater districts service the unincorporated County . . . As required by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, the San Diego LAFCO conducted multiple Municipal Service Reviews (MSRs) of wastewater districts that service the unincorporated area, including the 2007 MSR of County Sanitation Districts and the 2004 Southern San Diego County Water and Sewer MSR. The MSRs evaluated the future wastewater service capabilities of the following wastewater service providers: SVSD, Lakeside Sanitation District, ASD, JSD, PVSD, PDMWD, OWD, HWD, and SA/SB.	Of the twenty-five wastewater service providers, it appears that MSRs were completed only on the County Sanitation Districts and nine other agencies. The RMWD Santa Maria Sewer Service Area cannot meet current population demands let alone the 2020 and beyond population and housing projections based on the wet weather storage capacity and remaining spray field areas required to meet the Regional Water Quality Control Board's requirement for guaranteed disposal sites.
L3-52.	46	2.16	55	Wastewater districts that would serve the largest populations and increases in housing units under implementation of the General Plan Update include OWD (79,539 housing units and 236,309 persons); PDMWD (74,422 housing units and 211,348 persons); SVSD (28,199 housing units and 86,999 persons); and Ramona MWD (27,273 housing units and 83,719 persons).	The RMWD's Santa Maria Sewer Service area can only serve approximately 1.47 MGD at build out based on spray field areas currently available. Current customers require 1.14 MGD. Only 1,400 additional EDUs (or housing units) can be accommodated.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-53.	47	2.16	55	It should be noted that although these wastewater districts would service the greatest population and housing units under implementation of the General Plan Update, they generally would not experience substantial percentage growth when compared to existing conditions.	This statement is not representative of RMWD. As of June 30, 2005 it is estimated that the RMWD's Santa Maria Sewer Service Area (SMSSA) contained approximately 4,087 equivalent dwelling units and the San Vicente Sewer Service Area is near build out at 3,773 EDUs at the end of fiscal year 2008-09. Assuming the additional 27,273 EDUs that the County is projecting to require sewer service will be in our SMSSA, it represents a 575% ((27,273-3773)/4087) increase in our service area. This is a substantial percentage growth and a **SIGNIFICANT IMPACT**
L3-54.	48	2.16	55	As discussed in Section 2.16.1.2, the following wastewater districts have a greater number of allocated EDUs than available EDUs, indicating insufficient facilities to service the community at build out: ASD; Lakeside Sanitation District, PDMWD, SVSD, WGSMD, BWD, BSD, CWSMD, FPUD, and JSD. Wastewater districts that have larger available EDUs than allocated EDUs, indicating sufficient growth for build out of the community and beyond, include OWD, Cardiff, FRCSD, RSFCSD, VWD, and WPCSD.	The RMWD should be added to this list.
L3-55.	49	2.16	56	The General Plan Update would designate land uses that would increase population and housing in areas where wastewater districts do have adequate service systems in place to serve the projected growth of the community	The County of San Diego has not designated proposed land uses in Ramona compatible with disposing of wastewater effluent. In fact, all available land around existing spray fields has been acquired by the County and set aside for County Parks as shown in the draft EIR Section 2.14.
L3-56.	50	2.16	56	The General Plan Update contains one goal and supporting policy within the Land Use Element to assist in providing adequate wastewater facilities throughout the unincorporated County. In the Land Use Element, Goal LU-4 would require coordination with the plans and activities of other agencies that relate to issues such as land use, safety, community character, transportation, energy, and other infrastructure in the unincorporated County and the natural resources of the region.	This goal has not been met with the current planand is not met in the General Plan Update (for Ramona).

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-57.	51	2.16	56	While existing County policies and regulations and proposed General Plan Update goals and policies are intended to assist in providing adequate wastewater facilities, specific measures that implement these policies and regulations are proposed to ensure that the intended protections are achieved. Therefore, the proposed project would result in a potentially significant impact related to adequate wastewater facilities and specific implementation programs are identified as mitigation.	Since the General Plan Update inhibits the RMWD from providing adequate wastewater facilities for the projected growth, the mitigation proposed for other sewer agencies does not alleviate the **SIGNIFICANT IMPACT** proposed for Ramona. Without mitigation in Ramona, the EIR should state that there is a **SIGNIFICANT IMPACT**.
L3-58.	52	2.16	79	Ramona Municipal Water District - 65% Growth	The growth projections do not quantify the number of housing units that will be allowed to connect to wells versus a connection to public water. Without this quantification, the environmental impact and impact to rural utilities such as the RMWD is at best inconclusive.
L3-59.	53	2.16	81	Ramona Municipal Water District - 65% Growth	The growth projections do not quantify the number of housing units that will be allowed to connect to septic versus a connection to public sewer. Without this quantification, the environmental impact and impact to rural utilities such as the RMWD is at best inconclusive.
L3-60.	54	7	12	Policy S-15.3: Hazardous Obstructions within Airport Approach and Departure. Restrict potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet Federal or State aviation standards. Specific concerns include heights of structures near airports and activities which can cause electronic or visual impairments to air navigation or which attract large numbers of birds (such as landfills, wetlands, water features, and cereal grain fields).	*This should clarify that itaddresses future planned uses not currently approved uses*
L3-61.	55	7	14	Policy LU-14.1: Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.	RMWD supports this objective but does not think this policy has been met by the County's land use plans. In fact land being purchased by the County and set aside for parks and grasslands is restricting the ability of RMWD to assure consistency with the County's General Plan Update.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-62.	56	7	14	Policy LU-14.3: Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.	A large portion of the growth anticipated within the RMWD sphere of influence is outside of our Santa Maria Sewer Service Area. There have been numerous reports from developers that the County has denied septic permits due to high groundwater or failure to percolate. With limited spray field and wet weather storage capacity, the RMWD may be forced to develop a policy to restrict sewer service to parcels outside of the current sewer service boundary. Developers may find themselves without any public agency with the ability to provide sewer service to their subdivisions.
L3-63.	57	7	14	Policy LU-14.4: Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond Village boundaries (or extant Urban Limit Lines) except when necessary for public health, safety, or welfare.	The existing RMWD sewer system already extends well past the proposed Village Boundary in certain areas. The Ramona Airport also falls outside of the Village Boundary as do several planned large developments.
L3-64.	58	7	15	Policy LU-13.1: Adequacy of Water Supply. Coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply. Ensure that new development includes both indoor and outdoor water conservation measures to reduce demand.	Historically the County has not approached the RMWD to coordinate water or wastewater infrastructure planning with land use planning. The closest form of coordination that typically occurs is when a project comes close to having their map approved, a commitment form is provided to the developer with instructions to have the utility agency sign the form. In many circumstances, the developer is very upset when they approach the serving utility to find out that no water or sewer service has been identified for their project and that the planning evaluation required in the project availability form is required that will delay their map by 6-8 weeks. We applaud this policy, but based on historical circumstances are skeptical of its implementation.
L3-65.	59	7	15	Policy LU-13.2: Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.	Base on the new state wide planning of global warming and droughts it may be appropriate to have a sunset clause on water resource studies for specific projects.
L3-66.	60	7	16	Policy COS-4.1: Water Conservation. Reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.	RMWD support this policy.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-67.	61	7	29	Policy S-6.1: Water Supply. Ensure that water supply systems for development are adequate to combat structural and wild land fires.	See response to Comment #25
L3-68.	62	7	31	Policy LU-1.6: Village Expansion...Public facilities and services can support the expansion without a reduction of services to other County residents; and	Public facilities and services in Ramona cannot support expansion without a reduction of services to other residents.
L3-69.	63	7	42	Policy LU-9.4: Infrastructure Serving Villages and Community Cores. Prioritize infrastructure improvements and the provision of public facilities for villages and community cores and sized for the intensity of development allowed by the Land Use Map.	See response to Comment #27.
L3-70.	64	7	42	Policy LU-12.1: Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing. In addition to utilities, roads, bicycle and pedestrian facilities, and education, police, and fire services, transit oriented infrastructure, such as bus stops, bus benches, turnouts, etc, should be provided, where appropriate.	Policy lists infrastructure related to transportation facilities, but is listed under "Wastewater Treatment Requirements".
L3-71.	65	7	42	Policy LU-12.2: Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve a higher LOS but do not achieve a LOS of D or better	Policy lists infrastructure related to transportation facilities, but is listed under "Wastewater Treatment Requirements".
L3-72.	66	7	43	Policy LU-14.1: Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.	See response to comment #58.
L3-73.	67	7	43	Policy LU-14.2: Wastewater Disposal. Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.	This policy needs to be taken into consideration when the County is requiring land to be dedicated to open space and therefore limiting the available land needed to manage effluent disposal.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-74.	68	7	43	Policy LU-14.3: Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.	See response to comment #56.
L3-75.	69	7	43	Policy LU-14.4: Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond Village boundaries (or extant Urban Limit Lines) except when necessary for public health, safety, or welfare.	The existing RMWD sewer system already extends well past the proposed Village Boundary in certain areas. The Ramona Airport also falls outside of the Village Boundary.
L3-76.	70	7	43	Policy LU-1.4: Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model and Community Plans. For purposes of this policy, leapfrog development is defined as village densities located away from established Villages or outside established water and sewer service boundaries.	No comment
L3-77.	71	7	43	Policy LU-4.3: Relationship of Plans in Adjoining Jurisdictions. Consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and invite comments and coordination when appropriate.	No comment
L3-78.	72	7	43	Policy H-1.3: Housing near Public Services. Encourage the development of housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.	See response to comment #1.
L3-79.	73	7	45	Policy LU-4.3: Relationship of Plans in Adjoining Jurisdictions. Consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and invite comments and coordination when appropriate.	No comment.
L3-80.	74	7	58	Impacts associated with conflicts with waste water disposal systems would be less than significant; therefore, mitigation is not required.	In RMWD **the IMPACTS ARE SIGNIFICANT AND MITIGATION IS REQUIRED.**
L3-81.	75	7	75	USS-1.1 Participate in interjurisdictional reviews to gather information on and review and provide comments on plans of incorporated jurisdictions and public agencies in the region.	No comment

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-82.	76	7	75	USS-1.2 Implement and revise as necessary Board Policy I-84 to ensure adequate availability of sewer /sanitation service for development projects that require it. Also revise Board Policy I-78 to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities.	The revision to Policy I-78 should provide for the wastewater purveyor to be included in the overall process and the conditions of the agreement. The revision should include compliance with LU-4 and the Community Plan (Ramona Community Plan strongly discourages package treatment plants). These requirements shall be met prior to siting or permitting small wwtps.
L3-83.	77	7	75	USS-1.3 Ensure County planning staff participation in the review of wastewater facility long range and capital improvement plans.	This has not historically occurred prior to land use planning being implemented.
L3-84.	78	7	75	USS-2.2 Perform CEQA review on privately-initiated water and wastewater facilities and review and comment on water and wastewater projects undertaken by other public agencies to ensure that impacts are minimized and that projects are in conformance with County plans.	No comment
L3-85.	79	7	76	USS-4.3 Implement Policy I-84 requiring discretionary projects obtain water district commitment that water services are available. Also Implement and revise as necessary Board Policy G-15 to conserve water at County facilities.	Discretionary projects have historically gone through the County's CEQA and review process prior to ever approaching water agencies to determine if water service is feasible. Our policy is not to deny service to any proposed development, but conditions and offsite improvement required to obtain water service are rarely identified prior to the environmental documents being prepared. Our desire is to have the County revise policy USS-4.3 to read, "Implement Policy I-84 requiring discretionary projects obtain water district commitment that water services are available prior to CEQA documents being prepared" Water and sewer studies should be a part of the CEQA package required by the County similar to how traffic studies are completed.
L3-86.	80	7	77	The mitigation measures identified above in Section 7.2.16.1, Issue 1: Wastewater Treatment Requirements, would also apply to the issue of adequate wastewater facilities.	No comment

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-87.	81	Appendix D	3	The GP Update Groundwater Study area to evaluate long-term groundwater availability comprises approximately 1,885 square miles (roughly the size of the state of Delaware) which is entirely groundwater dependent.	Study does not address the water districts that have a large number of well users within their basins. Growth in these areas appears to have higher density zoning proposed since they are adjacent to existing water facilities. It does not account for a number of those parcels subdividing and pursuing well water in lieu of a public water supply since it may be a much more cost effective option for water service in the future. The General Plan Update should address groundwater resources in areas served by a SDCWA member agency or adopt a policy defining limits to new wells constructed within SDCWA boundaries and analyze hydrologic capacities based on those policies.
L3-88.	82	Appendix D	3	Unincorporated areas excluded from this study include the western region of the County within the CWA, which is largely supplied with imported water from member agencies of the CWA.	This may be true in some areas, but out of the 3,300 well permits issued in the Ramona CPA since 1974, the majority have been within the RMWD boundary.
L3-89.	83	Appendix J-9	Tables 8-1 to 8-7	RMWD UWMP - Normal Water Year Supply & Demand	*Supply and demands may need to be updated to reflect the recent drought and the state direction to plan for global warming. .*
L3-90.	84	General Plan, Chapter 3, Landuse Element	3-42	LU-14.1 Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.	See response to comment #58.
L3-91.	85	General Plan, Chapter 3, Landuse Element	3-42	LU-14.3 Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.	See response to comment #56.
L3-92.	86	General Plan, Chapter 3, Landuse Element	3-42	LU-14.4 Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond Village boundaries (or extant Urban Limit Lines) except when necessary for public health, safety, or welfares.	See comment 69.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-93.	87	General Plan, Chapter 3, Landuse Element	3-42	LU-14.5 Alternate Sewage Disposal Systems. Support the use of alternative on-site sewage disposal systems when conventional systems are not feasible and in conformance with State guidelines and regulations.	No comment
L3-94.	88	General Plan, Chapter 5, Conservation & Open Space Element	Figure C-1	Most of the land surrounding RMWD spray fields is dedicated as MSCP Preserve Areas	The remaining land available to the RMWD's severely restricts our ability to provide sewer service to any more than 1,400 additional EDUs. This condition results in a **SIGNIFICANT IMPACT** in RMWD's meeting the General Plan Update projected population and housing needs.
L3-95.	89	General Plan, Chapter 5, Conservation & Open Space Element	5-41	The dual purpose primary objective of open space within the MSCP preserve system is biological conservation. Open space may also be dedicated / preserved to meet other objectives such as preservation of cultural resources or avoidance of steep slopes. However, open space in general allows for the overall vision of this General Plan, along with the achievement of the County's strategic initiatives, to be met. Other land uses, such as passive recreational opportunities, may be appropriate within open space areas depending on the sensitivity of the resources being protected.	The RMWD desires to have a dual purpose on MSCP land for wet weather storage and the disposal of sewage effluent via evaporative spray fields.
L3-96.	90	General Plan, Chapter 6, Housing Element	6-2	To meet housing demands, the General Plan accommodates 80 percent of the unincorporated County's future population in communities located within the County Water Authority (CWA) boundary, where water and other public services are more readily available.	See response to comment #1 and #14
L3-97.	91	General Plan, Chapter 6, Housing Element	6-7	Communities located within the County Water Authority (CWA) boundary will accommodate most of the County's future population and most of its housing.	This statement is based on the assumption that capacity exists in RMWD and CWA pipelines and that most within the CWA boundary will connect to public water in lieu of digging a well.
L3-98.	92	General Plan, Chapter 6, Housing Element	6-7	Infrastructure and Services: Providing roads, sewer, and other infrastructure to support urban or suburban development is a challenge in many communities, particularly in the County's outlying communities. Additionally, in many of the rural villages Higher multi-family residential densities cannot be supported due to equipment limitations in many fire districts.	This statement is correct, but with the inadequate infrastructure that exists in the County's outlying communities, the Draft EIR still, **incorrectly**, claims that there is a less than significant impact.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-99.	93	General Plan, Chapter 9 Implementation General Plan		Overall comment	Does not address how water and sewer agencies are to provide services when available land needed by the agencies has been tied up as open space or set aside for parks & recreation.
L3-100.	94	Land Use Maps		Referral Map	Referral map shows APN 277-050-26 that RMWD uses for spray fields as Rural Lands 1 DU/40 acres. The parcel is restricted from ever being developed to have a dwelling unit constructed on it. It should be "Public/Semi-Public Facilities"
L3-101.	95	Draft Implementation Plan	7	2.4.1.B Infrastructure Concurrent with Need. Implement Board Policy I-84, Project Facility Availability and Commitment for Public Sewer, Water, School, and Fire Services, concerning the phasing of infrastructure with new development to ensure that adequate infrastructure and facilities are available concurrent with need before giving final approval to projects requiring discretionary approval	The RMWD's policy is that water and sewer facilities are available if a developer builds them. RMWD conditions attached to Project Facility Availability forms will indicate this, but historically the developer will be allowed to go through the CEQA process without identifying the water and sewer improvements required for the development.
L3-102.	96	Draft Implementation Plan	7	2.4.1.C Interjurisdictional Reviews. Review and comment on water and wastewater projects undertaken by other public agencies to ensure that impacts are minimized and that projects are in conformance with County plans.	*RMWD (and other similar agencies) as a state chartered independent agency does not alwayshave to conform to County plans. It is our policy , however, to co-operate with other jurisdictions where ever possible while at the same time retaining our right to independent decisions.*
L3-103.	97	Draft Implementation Plan	7	2.4.2.A Land Use Mapping. Review GPAs and implement the General Plan Land Use Map for consistency with the goals and policies of the General Plan to locate commercial, office, civic, and industrial development in villages, town centers or at transit nodes; and to ensue that adequate water supply is available for development projects that rely on imported water.	See response to Comment #1
L3-104.	98	Draft Implementation Plan	7	2.4.2.B Interjurisdictional Review. Coordinate with the San Diego County Water Authority and other water agencies to coordinate land use planning with water supply planning and support implementation and enhancement of water conservation programs.	This should include direct contact and discussion with local water district.
L3-105.	99	Draft Implementation Plan	8	2.4.3.A Long Range Facility Plans. Ensure County planning staff participation in the review of wastewater facility long range and capital improvement plans.	Wastewater planning and coordination typically has not occurred between the County and the RMWD.

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-106.	100	Draft Implementation Plan	8	2.4.3.B Wastewater Facilities for New Development. Revise Board Policy I-78, Small Wastewater Treatment Facilities, to include additional criteria and regulatory requirements restricting the location of small wastewater treatment facilities.	See comment on item 76
L3-107.	101	Draft Implementation Plan	8	2.4.3.C Wastewater Facility Permitting. Implement the Zoning Ordinance requirement for a Major Use Permit to construct a wastewater facility to ensure facilities are adequately sized.	*The exception to this is if a wastewater facility is already sited.*
L3-108.	102	Draft Implementation Plan	26	5.2.1.A Land Use Mapping. Review GPAs and implement the General Plan Land Use Map for consistency with the goals and policies of the General Plan to designate groundwater dependent areas with land use density/intensity that is consistent with the long-term sustainability of groundwater supplies.	Without investigating the long term sustainability of groundwater supplies within the CWA boundaries or a policy restricting groundwater consumption within CWA boundaries, the draft EIR only assumes that groundwater capacity will exist for future developments within the CWA.
L3-109.	103	Draft Implementation Plan	32	5.6.1.A Open Space Preserves. Acquire open space through Multiple Species Conservation Program (MSCP) regulatory requirements.	This needs to consider other uses for the land that include waste water effluent storage and spray fields for the benefit of public health and safety and in order to provide services consistent with the General Plan Update.
L3-110.	104	Ramona Community Plan	14	Development within the service area of the Water District will be supplied with imported water. Thus, groundwater impacts will be minimized.	This doesn't appear to be stated within the County's General Plan Update. If the County adopts a policy of not issuing additional well permits within the CWA boundary, this statement is correct.
L3-111.	105	Ramona Community Plan	20	The treated water Poway pump station capacity is 20,842 AFY (18 mgd) and the 2007 annual demand is 7,573 AFY and is projected to be approximately 8,873 AFY in 2020. As these numbers indicate the RMWD has sufficient capacity in both the treated and untreated water supply system to meet demands based on the GP 2020.	The Poway Pump Station is rated for 18 MGD, but the capacity of the SDCWA pipeline to the pump station is limited to 20 MGD. The Max. Day Demand for the growth projected in the General Plan exceeds 22.5 MGD. In addition the RMWD is deficient in operational and terminal water storage and cannot meet the SDCWA's recommendation for a 10 day outage.
L3-112.	106	Ramona Community Plan	21	However, Bargar Water Treatment Plant has been out of service for over a year and is not expected to be returned to service in the foreseeable future.	No comment
L3-113.	107	Ramona Community Plan	21	Based on land restrictions in Ramona, the RMWD projects are able to provide sewer service in the SMSSA for only approximately 46% of the projected population capacity of the County General Plan Land Use Map.	Should be revised to read that the "the RMWD projects are able to provide sewer service in the SMSSA for only 1,400 additional EDUs out of the 27,273 housing units planned for Ramona".

Comment Letter L 3, Ramona Municipal Water District (cont.)

	RMWD Comment No.	Chapter	Page	General Plan Update Draft EIR	RMWD Comment
L3-114.	108	Ramona Community Plan	22	The development allowed in the current version of General Plan 2020 translates to 7,118 EDU's based on RMWD assuming only 70% of the General Plan 2020 development will occur and that parcels currently on septic will not require sewer in the future.	In Chapter 2.16, page 55 of the draft EIR, it says "Ramona MWD (27,273 housing units and 83,719 persons)." We are assuming that the County believes that 27,273 housing units will be connected to the RMWD which is significantly higher than the 7,118 EDUs listed in this section of the Community Plan. The 7,118 value is only parcels within the Santa Maria Sewer Service Area (SMSSA) and does not include parcels outside of the SMSSA.
L3-115.	109	Ramona Community Plan	34	Policy LU 5.1.4 Coordinate with the Ramona Municipal Water District to provide an adequate balance of water resources for both agricultural, as well as residential/commercial/industrial land uses.	RMWD fully supports this policy and encourages implementation.
L3-116.	110	Ramona Community Plan	35	Policy LU5.1.10 Sewers, in and of themselves, are not growth inducing.	No comment

Responses to Letter L 3, Ramona Municipal Water District

L3-1 These introductory comments regarding impacts are more fully developed later in this comment letter and therefore more detailed responses are presented below for each topic.

L3-2 The County does not agree with the recommendation to change land use designations for the Ramona Community Planning area to ensure that potential future housing units do not exceed 1,400. The proposed project is substantially reducing density in Ramona when compared to the existing General Plan. The commenter notes that the Ramona Municipal Water District (RMWD) does not have the ability to accommodate more than 1,400 equivalent dwelling units (EDUs) to support future development. While the County understands that the RMWD has the ultimate determination for whether or not sewer services can be provided, the County will work with RMWD to explore opportunities to increase its capacity for providing sewer services within its service area. Additionally, the County notes that alternatives to RMWD service may exist, such as the use of other districts, the use of septic systems, or the construction of package wastewater treatment plants. The County disagrees that the current capacity of RMWD facilities and infrastructure should be the primary factor that determines the land use designations for the General Plan Update land use map.

The County also notes that significant growth has been projected for Ramona for several years and RMWD has been aware of this information and based its planning on those projections. For example, in 1997, SANDAG was projecting a 2020 population for Ramona of 65,472. This data was the primary growth assumption available when RMWD prepared its 1999 Water and Wastewater Master Plan. RMWD's most recent Urban Water Management Plan, prepared in 2005, was based on SANDAG growth projections of 55,024 people in 2020 and 57,545 in 2030. SANDAG is now projecting that Ramona will not see 50,000 people until 2050. For 2020, the population is projected to be approximately 39,100 and for 2030 the projection is 44,600 people.

L3-3 The County agrees that new or expanded facilities would be needed to accommodate future growth under the proposed project. General Plan Update policies and mitigation measures that address this issue are provided in DEIR Section 2.16.6.2. The County does not agree that expansion of facilities is not feasible.

L3-4 The County does not agree with this comment. The DEIR evaluates impacts and provides mitigation at a programmatic level. Mitigation specific to RMWD is not necessary or appropriate. The County will work closely with RMWD regarding future disposal options and expansion, not only on a project-by-project basis but also as a matter of policy and regional planning overall. The County does not agree that it should take the lead on planning for such facilities or provide for spray fields on County-owned preserve lands.

L3-5 The comment correctly states that the groundwater analysis (General Plan Update Groundwater Study) omitted areas served by a San Diego County Water Authority (SDCWA) member agency such as the RMWD. The vast majority of the population

Responses to Letter L 3, Ramona Municipal Water District (cont.)

located within the SDCWA service area is served by imported water as their primary source of water. To evaluate impacts to groundwater resources in areas served by SDCWA member agencies is exceedingly difficult on a regional scale. The General Plan Update Groundwater Study provided as an appendix to the DEIR is unique in that it goes into detail and specificity beyond what is typically done for a program EIR and General Plan. The analysis requested in the comment would need to factor in artificial recharge from septic systems/irrigation return flows, quantifying those who use groundwater only, those who use imported water only, and those who use a combination of imported water and groundwater. These complexities made such an analysis infeasible for the large area covered by imported water service. Without some substantial evidence that groundwater usage within the RMWD boundary has potentially significant adverse environmental effects, the County does not agree that a new policy is warranted.

It should be noted that discretionary permits which would rely upon groundwater resources as their primary source of water within an area served by a SDCWA member agency would be subject to the San Diego County Groundwater Ordinance. A site-specific groundwater investigation would be required to evaluate potential impacts to groundwater resources and whether the project has a long-term potable supply of groundwater. Moreover, policies and mitigation measures to address impacts related to groundwater supply and adequate water supply are provided in DEIR Sections 2.8.6.2 and 2.16.6.4 respectively. Therefore, an additional policy to restrict or quantify well permits is unwarranted

L3-6 The County acknowledges this comment and has made every effort to address all of RMWD's comments and concerns.

L3-7 The comment pertains to the second project objective listed in Chapter 1. The County agrees that current capacity for water and sewer service in some areas would not support the full build-out of the General Plan Update. Discussion of utility and service expansions is provided in Section 2.16 of the DEIR. This comment, and the DEIR analysis as provided, does not affect the validity of the second project objective.

L3-8 The comment pertains to the ninth project objective listed in DEIR Chapter 1. Discussion of environmental impacts related to utilities and service systems is provided in DEIR Section 2.16. This comment, and the DEIR analysis as provided, does not affect the validity of the ninth project objective.

L3-9 The comment refers the reader back to comment L3-7. No further response is provided.

L3-10 The comment refers the reader back to comment L3-7. No further response is provided.

L3-11 The County acknowledges that new or expanded facilities will be required to accommodate housing in Ramona. Impacts associated with this issue are discussed in Section 2.16.3.2 of the DEIR and found to be potentially significant.

Responses to Letter L 3, Ramona Municipal Water District (cont.)

L3-12 The County agrees that Major Use Permits (MUPs) should not be approved if there is inadequate infrastructure and capacity of services. The County requires facility availability and commitment prior to approval of MUPs pursuant to Board Policy I-84. The issue raised in this comment is not at variance with the content of the DEIR

L3-13 The County acknowledges that, under the project alternative, 6,208 future housing units are forecast for the Ramona Community Planning Area (CPA). However, the boundary for the Ramona CPA is not the same as the Ramona MWD boundary. In addition, DEIR Table 2.16-1, SDCWA Member Water Districts - Existing and Future Housing and Population, has been revised to reflect that a total of 14,174 homes are forecast for the Ramona Municipal Water District service area, rather than 27,273. This revision reflects that 5,837 additional homes are actually forecast for the service area, as compared to the 10,771 previously reported in the DEIR. See also response to comment L3-2 above.

L3-14 The comment refers the reader back to comment L3-13. No further response is provided.

L3-15 The comment refers the reader back to comment L3-13. No further response is provided.

L3-16 The County does not agree that the DEIR fails to identify significant impacts to habitat as a result of development under the General Plan Update (including the given information regarding the necessary land required for every four EDUs). The DEIR is a programmatic document that looks at impacts over the County unincorporated area as a whole and not specifically for a given service area. Nevertheless, a conservative approach was used and the DEIR identified significant impacts to special status species and their habitats resulting from the proposed project.

L3-17 The core and linkage resource areas shown in Figure 2.4-2 are for analysis purposes to identify potential impacts to wildlife movement paths that may result from the proposed project. The General Plan Update does not propose any MSCP designations as part of the project.

L3-18 The Geographic Information Systems model used to estimate impacts to vegetation cannot account for individual parcels on a case-by-case basis. While some areas may have greater impacts, others will likely have fewer impacts in the build out of the General Plan Update. It should be noted that the parcels identified in this comment are owned by RMWD, which is a separate jurisdiction in which vegetation was already considered impacted per the district's capital improvement plans. As such, direct impacts to vegetation on these parcels should not be included in the County's General Plan Update DEIR impact analysis at all. However, as stated above, the GIS model estimated impacts over a very large area and the County used a conservative approach in quantifying potential direct, indirect, and cumulative effects to biological resources.

Responses to Letter L 3, Ramona Municipal Water District (cont.)

L3-19 The location of the Ramona Airport is provided in DEIR Section 2.7 as context to the issue of public airport locations creating a hazard for people residing or working nearby. The information provided in this comment is not relevant to this issue.

L3-20 Please refer back to response to comment L3-5 for a discussion regarding the exclusion of lands within the SDCWA from analysis within the groundwater study. The County disagrees that a well permit moratorium is an appropriate course of action.

L3-21 As identified within the General Plan Update Groundwater Study, the basins that were analyzed were east of the SDCWA boundary. This is discussed as a limitation in Section 5.2 of the study. The groundwater demand, storage, artificial recharge from imported water, and other parameters within the RMWD are not considered in the evaluation of long-term groundwater availability within the study.

L3-22 The County acknowledges the comment that the RMWD may not be able to provide services to the population projected by the General Plan Update. As discussed in responses to comments L3-2 and L3-13 above, the General Plan Update is forecasting a significant reduction in growth potential when compared to the existing General Plan and SANDAG is projecting less growth for Ramona in the near future. The possible inability to provide services to future development potential is not new to the General Plan Update; however, the Update will lessen the disparity in some cases, as will the efforts by SANDAG, the County, and the cities of the region to better plan for the future growth.

The need for expanded public services to support growth under the General Plan Update is not unique to the RMWD. Chapter 2.16 of the DEIR acknowledges that additional public infrastructure expansion and improvements will be needed and considers the environmental consequences of such projects. Should RMWD's capabilities to serve new development be limited, other options may exist such as use of package treatment plans and service by other agencies. Additionally, the County's policies and development review process includes safeguards to ensure that RMWD is not committed to serving development beyond its capacity. A Service Availability Form completed by the RMWD is required prior to approval of a development project within district boundaries. Prior to authorization of building permits, an applicant must demonstrate a commitment by RMWD to serve the project.

L3-23 This comment does not raise a significant environmental issue for which a response is required.

L3-24 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-25 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

Responses to Letter L 3, Ramona Municipal Water District (cont.)

L3-26 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-27 The County does not agree that this clarification is needed. While the proposed General Plan Update policies will generally apply only to new land use and new development, they may also apply to various other permits, projects, and applications to modify existing development or uses. As such, it would not be accurate to state that the policy only applies to "new" land use.

L3-28 The County does not agree that the County's planning process did not include the RMWD. County staff sought input from the RMWD many times during the preparation process. The RMWD was noticed of numerous hearings related to the project and most recently of the April 2008 Notice of Preparation for the DEIR and the November 2008 initial draft of the General Plan. The land use maps and policies have been developed over multiple years through a very public process, including numerous Ramona Community Planning Group meetings, public workshops, and Planning Commission and Board of Supervisors' hearings.

In addition, the County does not agree that this planning process did not address the RMWD's ability to provide services to the projected population. As discussed under response to comment L3-22, the County is aware of RMWD's current capacity and has accounted for it in the DEIR.

L3-29 The SANDAG population forecasts are based on the General Plan Update land use maps; therefore, the two forecasts are consistent when determining the number of future dwelling units. These are the numbers that are most important when planning sewer infrastructure needs. The County acknowledges that there are differences in methodology when converting the future dwelling units to future population; as the County and SANDAG use slightly different factors for vacancy rates and persons per household. DEIR section 2.16 identifies a "Potentially Significant" impact to providing additional services and facilities. Therefore, the DEIR has not been changed as a result of this comment.

L3-30 The County appreciates the comment and has revised DEIR Section 2.13.1.1 Fire Protection under the Ramona Municipal Water District heading by replacing this text "was managed by the District until July 1, 1993, when the Board entered into a cooperative fire protection agreement with CAL FIRE to provide the fire and paramedic services" with the following:

"<u>is managed by the RMWD. RMWD has a year-to-year contract with CAL FIRE to operate the RMWD fire department under the direction of the RMWD General Manager</u>."

L3-31 The intention of General Plan Update policy S-6.1 Water Supply is to require new development to coordinate with fire and water service providers to ensure infrastructure and supply are adequate and available prior to approving new development projects. Fire and water service providers have the right refuse service to the planned development that cannot be adequately supported.

Responses to Letter L 3, Ramona Municipal Water District (cont.)

L3-32 This section did not include a comment; therefore, no further response is provided.

L3-33 The comment pertains to proposed Policy LU-1.6. The County acknowledges that water and sewer facilities will need to be “upsized or extended” to support any future expansion of the Ramona Village. This comment is not at variance with the DEIR.

L3-34 The Ramona Community Planning Area boundary is significantly different that the Ramona Municipal Water District boundary, as shown on General Plan Update Land Use Element figure LU-2 Water Districts; therefore, the difference in population forecasts is appropriate. However, the numbers reported in DEIR Table 2.13-2 Fire Protection Agencies Existing and Future (Proposed Project Build-out) Housing and Population Forecast were found to be in error and have been corrected to show 16,502 housing units in 2004 with a population of 50,656 and 22,446 proposed housing units with a population of 68,897.

L3-35 The Ramona Community Planning Area boundary is significantly different that the Ramona San Diego County Sheriff's Department Beat boundary. No changes were made to Table 2.13-6 in response to this comment.

L3-36 The comment refers the reader back to comment L3-29. No further response is provided.

L3-37 This section did not include a comment; therefore, no further response is provided.

L3-38 DEIR Table 2.14-1, Existing Local Parks and Recreational Facilities, has been corrected to show that the Ramona Municipal Water District is the owner of Ramona Wellfield Park, rather than the County Department of Parks and Recreation.

L3-39 Separate CEQA documents were prepared to analyze impacts for the acquisition of Ramona Grassland and Santa Maria Creek preserves. These preserves were noted in the DEIR for the purpose of establishing the existing conditions, but are not part of the proposed project.

L3-40 This comment pertains to Issues 1 and 2 within DEIR Section 2.16 and suggests that the determinations for these issues should be “Significant Impact.” The County concluded within the DEIR that there would be a significant impact associated with these issues (Wastewater Treatment Requirements and New Water or Wastewater Treatment Facilities). The DEIR further concluded that these impacts would be mitigated to below significant. The comment does not provide evidence or reasoning to support any changes to these sections of the DEIR.

L3-41 This comment does not raise a significant environmental issue for which a response is required.

L3-42 This section did not include a comment; therefore, no further response is provided.

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L3-43 The second sentence of the DEIR Section 2.16.1.1, Potable Water Supply and Distribution, under the Ramona Municipal Water District heading has been revised to reflect that the Ramona MWD has 9,477 connections rather than 8,839 connections.

L3-44 The third sentence of the DEIR Section 2.16.1.1, Potable Water Supply and Distribution, under the Ramona Municipal Water District heading has been revised to reflect the corrections provided in this comment.

L3-45 The fourth sentence of the DEIR Section 2.16.1.1, Potable Water Supply and Distribution, under the Ramona Municipal Water District heading has been amended with the following text, as recommended:

"however, the plant is currently not in operation and although rated at 5.3 mgd has been unable to operate above 3.0 mgd as a result of recent changes in drinking water standards."

L3-46 The first sentence of the DEIR Section 2.16.1.2, Wastewater Collection, Transmission and Disposal, under the Ramona Municipal Water District heading has been revised as recommended by the comment.

L3-47 The second sentence of the DEIR Section 2.16.1.2, Wastewater Collection, Transmission and Disposal, under the Ramona Municipal Water District heading has been revised as recommended by the comment.

L3-48 The third sentence of the DEIR Section 2.16.1.2, Wastewater Collection, Transmission and Disposal, under the Ramona Municipal Water District heading has been deleted and replaced with the following:

"The rated plant capacity for Santa Maria is 1.00 mgd and for San Vicente is 0.8 mgd. The annual moving average flow rate is 0.81 mgd for Santa Maria and 0.61 for San Vicente. However, the Santa Maria Wastewater Treatment Plant exceeded its rated capacity on several occasions during the last ten years and in 2005 experienced 30-day moving average flow of 1.14 mgd."

L3-49 Please refer back to response to comment L3-5 for a discussion regarding the exclusion of lands within the SDCWA from analysis within the groundwater study. The County disagrees that a well permit moratorium is an appropriate course of action.

L3-50 This comment pertains to Issue 5 within DEIR Section 2.16.3.5 and suggests that the determination for this issue should be "Significant Impact." The County concluded within the DEIR that there would be a significant impact associated with this issue (Adequate Wastewater Facilities). The DEIR further concluded that significant impacts would be mitigated to below significant. The comment does not provide evidence or reasoning to support any changes to this section of the DEIR.

L3-51 This comment makes an observation about the LAFCO information provided in DEIR Section 2.16.3.5, to which a response is not required. Regarding RMWD's capacity

Responses to Letter L 3, Ramona Municipal Water District (cont.)

to meet future growth, the comment is not at variance with the DEIR. See also responses to comments L3-2 and L3-13 above.

L3-52 Please refer to responses to comments L3-2 and L3-13 above.

L3-53 The concerns in this comment partially stem from an error in the DEIR. The estimated number of housing units for RMWD is actually 14,174 rather than 27,273. The estimated percentage growth for this district under the project is 41 percent. The corrected numbers have been updated in DEIR Section 2.16.3.5 and Table 2.16-4. See also responses to comments L3-2 and L3-13 above. This 41 percent increase is still considered to be a significant impact, as was concluded in the summary at the end of Section 2.16.3.5.

L3-54 The County agrees with this comment. The sixth paragraph under the "Impact Analysis" heading of DEIR Section 2.16.3.5, Issue 5: Adequate Wastewater Facilities has been revised to include Ramona MWD in the list of wastewater districts that have a greater number of allocated Equivalent Dwelling Units (EDUs) than available EDUs.

L3-55 This comment mis-quotes the given sentence within the seventh paragraph of DEIR Section 2.16.3.5. The sentence actually reads as follows:

"The General Plan Update would designate land uses that would increase population and housing in areas where wastewater districts do not have adequate service systems in place to serve the projected growth of the community."

As such, the comment fails to raise an issue to which a response can be provided.

L3-56 The County disagrees that Land Use Element Goal LU-4 Inter-Jurisdictional Coordination has not been met in the General Plan Update for Ramona as discussed in response to comment L3-28 above. In addition, the County is committed to establishing a process of continued coordination with the RMWD throughout implementation of the General Plan Update.

L3-57 The request in this comment that DEIR identify a significant impact with regard to adequate wastewater facilities is not at variance with the content of the DEIR. As cited within the comment itself, the County has identified that the "project would result in a potentially significant impact." The County does not agree that the mitigation provided in the DEIR is for other sewer agencies and does not alleviate impacts within Ramona. For example, mitigation measure USS-1.2 would prevent development that is dependent on sewer unless capacity and services are available. Therefore, potential impacts within Ramona and other sewer-dependent areas would be mitigated. It is not clear how the project "inhibits RMWD from providing adequate wastewater facilities for the projected growth."

L3-58 This comment pertains to DEIR Table 2.16-1. Please see responses to comments L3-13 and L3-53 above regarding changes to this table. The County acknowledges that the DEIR does not specifically quantify the number of future housing

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connections that require a connection to public water as opposed to those that would use groundwater from wells. This level of detail is not appropriate for the programmatic EIR for the General Plan Update. (see also response to comment L3-5 above).

L3-59 This comment pertains to DEIR Table 2.16-4. Please see response to comment L3-53 above regarding changes to this table. The County acknowledges that the DEIR does not specifically quantify the number of future housing connections that would utilize sewer as opposed to those that would use septic systems. This type of analysis would be speculative and, moreover, the level of detail would not be appropriate for the programmatic EIR for the General Plan Update.

L3-60 General Plan Update Safety Element policy S-15.3 Hazardous Obstructions within Airport Approach and Departure has been revised by adding "development of" prior to "potentially hazardous obstructions," as recommended.

L3-61 Please refer to responses to comments L3-28 and L3-56 above.

L3-62 The County appreciates this information. This comment does not raise a significant environmental issue for which a response is required.

L3-63 The County acknowledges appreciates and acknowledges this information. The intent of Policy LU-14.4 Sewer Facilities is to limit future expansions beyond Village boundaries.

L3-64 The County acknowledges that past practices may have not been accomplished in accordance with this policy; however, the policy will require development review procedures to be revised to improve coordination of land use and water infrastructure planning.

L3-65 The County appreciates the comment; however, it is not clear what "water resources studies" the comment is referring to. The County typically does not perform studies for water resources. All water districts, including the RMWD, are required to update their Urban Water Management Plan every 5 years. These plans typically project out at least 20 years; therefore, the frequency of their updates should accommodate for changes in circumstances. Individual development projects may require Water Supply Assessments, but these are prepared by the serving water district at the County's request and are done so when the County is processing the project using up-to-date information. Lastly, the County's service availability forms which are completed by the serving district include the following statement: "This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, <u>unless a shorter expiration date is otherwise noted</u>" (emphasis added). Therefore, should RMWD wish to restrict the applicability of an availability form for a project due to possible future changes that could affect that availability, it has the ability to specify an expiration date on its form.

Responses to Letter L 3, Ramona Municipal Water District (cont.)

L3-66 The County appreciates the support shown for General Plan Update policy COS-4.1 Water Conservation. This comment does not raise a significant environmental issue for which a response is required.

L3-67 The comment refers the reader back to comment L3-31. No further response is provided.

L3-68 This comment pertains to proposed Policy LU-1.6. Please refer to response to comment L3-33 above.

L3-69 The comment refers the reader back to comment L3-33. No further response is provided.

L3-70 Policy LU-12.1 is intended to be all inclusive and include wastewater as well as transportation infrastructure.

L3-71 Policy LU-12.2 is intended to be all inclusive and include wastewater as well as transportation infrastructure.

L3-72 The comment refers the reader back to comment L3-64. No further response is provided.

L3-73 The County does not agree with this comment. The comment suggests that the County's acquisition of land for open space conflicts with proposed Policy LU-14.2 for wastewater disposal. The County strives to preserve lands for open space and still accommodate future development and infrastructure under the General Plan Update. Based on the County's assessment of the unincorporated area, including Ramona, these goals are achievable.

L3-74 The comment refers the reader back to comment L3-62. No further response is provided.

L3-75 This comment pertains to proposed Policy LU-14.4. Please refer to response to comment L3-63 above.

L3-76 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-77 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-78 The comment refers the reader back to comment L3-7. No further response is provided.

L3-79 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

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L3-80 The comment pertains to DEIR Section 7.2.6.5, which correctly concludes that impacts would be less than significant. See DEIR Section 2.6.3.5 in the Geology and Soils subchapter for full discussion of this issue. Since the comment fails to provide any substantial evidence or reasoning for a conclusion of "significant impact," no changes were made to the DEIR.

L3-81 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-82 The County concurs that wastewater purveyors should be included in the overall process to update Board Policy I-78. The County is committed to making this update an open and inclusive process.

L3-83 The County acknowledges that past practices may have included County staff review of wastewater facility long range and capital improvement plans; however, the inclusion of this mitigation measure indicates the County's commitment to improving the process.

L3-84 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-85 The County disagrees that projects have historically gone through the County's CEQA review process prior to water agency determination that water service is feasible. Previous and current project processing procedures require a "Will Serve" letter from water districts with the project application. The project application is required prior to the CEQA review. The County recommends that water and sewer studies, when necessary, should be completed prior to water districts providing any letter to the County discussing the availability of water and sewer services.

L3-86 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-87 Please refer back to response to comment L3-5 for a discussion regarding the exclusion of lands within the SDCWA from analysis within the groundwater study. The County disagrees that a well permit moratorium is an appropriate course of action.

L3-88 The County appreciates this information but does not find that it is at variance with the content of the DEIR. See also response to comment L3-5.

L3-89 The County appreciates and acknowledges this updated information. However, existing conditions provided in the DEIR describe conditions on or around April 2008, which is when the notice of preparation was circulated for public review and is therefore the date established for the data baseline. This is consistent with Section 15125 of the CEQA Guidelines, which states, "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published." Therefore, no revisions were made to the DEIR in response to this comment.

Responses to Letter L 3, Ramona Municipal Water District (cont.)

L3-90 The comment refers the reader back to comment L3-64. No further response is provided.

L3-91 The comment refers the reader back to comment L3-62. No further response is provided.

L3-92 The comment refers the reader back to comment L3-75. No further response is provided.

L3-93 This section of the letter includes a citation from the DEIR but states "no comment." Therefore, no further response is provided.

L3-94 It is not clear from this comment which part of the DEIR is being criticized as having a significant impact. Regarding the RMWD capacity in relation to the proposed project, please refer to responses to comments L3-2 and L3-13 above.

L3-95 The County does not agree with this request. The proposed dual-purpose use would not be consistent with the County's Multiple Species Conservation Program (MSCP) Subarea Plan Section 1.9, Land Uses Allowed Within the Preserve.

L3-96 The comment refers the reader back to comments L3-7 and L3-20. No further response is provided.

L3-97 The County does not agree that the cited statement from the draft Housing Element is related to any assumptions regarding imported water facilities.

L3-98 It is not clear what section of the DEIR this comment refers to as being "incorrect."

L3-99 The County disagrees that the General Plan Update Implementation Plan should address how water and sewer agencies are to provide services. This needs to be addressed within the plans developed by those agencies. However, the draft Implementation Plan includes measures that require the County to coordinate land use planning with water and sewer agencies, such as 2.4.2B Water Agency Coordination and 2.4.3.A Long Range Wastewater Facility Plans.

L3-100 The County appreciates the comment and has revised the land use map to show parcel APN 277-050-26-00 as "Public/Semi-Public." See Planning Commission Tentative Recommendation Land Use Maps at www.sdcounty.ca.gov/dplu/gpupdate/pc_nov09.html

L3-101 Please refer to response to comment L3-85 above.

L3-102 The County acknowledges that state-chartered independent agencies do not have to always conform to County plans. Implementation Plan measure 2.4.1.C Interjurisdictional Reviews is intended to facilitate review and coordination between the County and other jurisdictions, including water districts.

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L3-103 The comment refers the reader back to comments L3-7. No further response is provided.

L3-104 The County acknowledges that there should be direct contact and discussion with the local water district to coordinate land use and water supply planning. Implementation Plan measure 2.4.2.B has been renamed from "Interjurisdictional Review" to "Water Agency Coordination" to better demonstrate this.

L3-105 The County acknowledges that previously wastewater planning and coordination has not always occurred at the necessary level; however, this Implementation Plan measure shows the County's commitment to improving the coordination.

L3-106 The comment refers the reader back to comments L3-82. No further response is provided.

L3-107 This comment lacks sufficient detail to which a more thorough response can be provided.

L3-108 The County does not agree with this comment. The DEIR assumes that the vast majority of development within the SDCWA boundary will be served by SDCWA member agencies. Most development relying upon groundwater resources as its primary source of water within an area served by a SDCWA member agency would be subject to the San Diego County Groundwater Ordinance and the County of San Diego CEQA Guidelines for Determining Significance - Groundwater Resources. A site-specific groundwater investigation would be required to evaluate potential impacts to groundwater resources and whether the project has a long-term potable supply of groundwater.

L3-109 The County disagrees that draft Implementation Plan measure 5.6.1.A Open Space Preserves needs to consider other uses for the land, such as wastewater effluent storage and spray fields. Other potential uses for the land would be speculative and would not be pertinent to this implementation measure. MSCP land acquisitions undergo detailed environmental and financial review at the time they are taken to the Board of Supervisors for consideration.

L3-110 The County does not agree with this comment. Because Board Policy I-84 and building permit requirements necessitate that development within the district's boundaries obtain water service from RMWD, the County finds that the cited statement regarding minimization of groundwater usage is true. The County acknowledges that some water users may still obtain well permits which would result in some groundwater usage. See also response to comment L3-5 above.

L3-111 The County concurs with this comment. The Existing Community Facilities and Infrastructure section of the draft Ramona Community Plan, under the "Water" heading has been revised by deleting the statement "As these numbers indicate the Ramona Municipal Water District (RMWD) has sufficient capacity in both the treated and untreated water supply system to meet demands based on the GP 2020" and adding text that describes the limitations of the San Diego County Water Authority

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(SDCWA) pipeline, the growth projections of the General Plan Land Use Map exceeding 22.5 million gallons per day (mgd), and the RMWD deficiencies in operational and terminal water storage and inability to meet SDCWA's recommendation for a 10-day outage.

L3-112 This section of the letter includes a citation from the draft Ramona Community Plan but states "no comment." Therefore, no further response is provided.

L3-113 The County disagrees that the proposed changes are necessary. The text as currently written clearly identifies the issue that due to deficiencies in the wastewater treatment facility infrastructure, the forecasted growth in Ramona cannot be accommodated. See also response to comment L3-13 regarding revisions to the projected housing within the RMWD's boundaries.

L3-114 DEIR Section 2.16 has been revised to reflect that the housing and population that the RMWD would serve is 14,174 housing units and 43,510 persons, rather than the previously reported 27,273 housing units and 83,719 persons (refer to response to comment L3-13). The paragraph of the Ramona Community Plan that the commenter is referring to is intended to identify only parcels within the Santa Maria Sewer Service Area. Therefore, the document does not require revision.

L3-115 The County appreciates the comment. No response is necessary.

L3-116 This section of the letter includes a citation from the draft Ramona Community Plan but states "no comment." Therefore, no further response is provided.

Comment Letter L 4, San Diego Association of Governments (SANDAG)

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August 31, 2009

File Number 3330300

Devon Muto
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

SUBJECT: Draft Environmental Impact Report and Draft General Plan for the County Of San Diego

Dear Mr. Muto:

L4-1. Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the San Diego County General Plan Update, and for addressing a majority of the comments contained in SANDAG's January 16, 2009, letter on the Draft General Plan Update.

Our comments, which are based on policies included in the Regional Comprehensive Plan (RCP), and the Regional Transportation Plan (RTP) are submitted from a regional perspective emphasizing the need for land use and transportation coordination and implementation of smart growth principles.

Draft EIR General Comments

L4-2. 1. The San Diego region has elected to be exempt from the state CMP program. The County Board of Supervisors adopted a resolution on July 22, 2009 electing to be exempt from the state CMP. Existing CMP monitoring, threshold levels, guidelines and mitigation strategies will be incorporated into other SANDAG plans and/or programs as a result. All CMP language and references within the Draft General Plan and Appendices should be revised to consider these events.

L4-3. 2. The County's Mobility Element includes additional improvements to segments of Interstate 8 and State Routes 67, 76, 78, 94, and 188 that are inconsistent with projects that are included in the 2030 RTP. Please revise to ensure consistency with the 2030 RTP.

L4-4. 3. Page 4-19 Public Transit. Please clarify that the High Speed Rail alignment from "San Diego would be connected to this proposed system via the Interstate 15 corridor, from downtown San Diego to Escondido, Riverside County, and Los Angeles." The high speed rail alignment would originate in Downtown San Diego linking University City, Escondido, Riverside County and Los Angeles via the LOSSAN, Miramar Rd/Carroll Canyon Rd, and I-15 corridors.

Comment Letter L 4, San Diego Association of Governments (SANDAG) (cont.)

L4-5. 4. Page 4-19 Airport. In the Airport section, the San Diego International Airport is sometimes called Lindbergh Field; the airport should be referenced consistently throughout the document.

L4-6. 5. Page 4-24 Policy Goal M-8. Coordinate with SANDAG, NCTD, and MTS to maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit only lanes.

L4-7. 6. Tables that are referenced in sections and paragraphs of the Draft EIR would be better served directly following the text rather than appearing at the end of the document.

L4-8. 7. There are portions within the Draft EIR, where the County references MOBIILITY 2030, amendments to MOBILITY 2030, and the 2006 RTIP. The most recent RTP is the 2030 RTP: Pathways for the Future (2030 RTP), adopted in November 2007. The most recent RTIP is the 2008 RTIP. All references should be made to the latest RTP and RTIP documents.

Draft EIR Specific Comments

L4-9. 1. **Page 2.15-4 Existing Roadway Network Performance.** Last paragraph and last sentence LOS should read as F not as E.

L4-10. 2. **Page 2.15-7 Bus Service – Paratransit.** Have any of the listed community planning areas lost paratransit coverage?

L4-11. 3. **Page 2.15-8 Rail Service.** The "San Diego-Los Angeles-San Luis Obispo Corridor" should be referred to as the Los Angeles-San Diego-San Luis Obispo rail corridor and abbreviated as the LOSSAN Corridor.

L4-12. 4. **Page 2.15-8 Rail Service.** The SPRINTER does not operate on the LOSSAN Corridor. The SPRINTER operates between Oceanside and Escondido. Change Sprinter references to SPRINTER.

L4-13. 5. **Page 2.15-9 Rail Service.** COASTER rail service needs a section title. Change Coaster to COASTER

L4-14. 6. **Page 2.15-9 Rail Service.** Change MetroLink to Metrolink.

L4-15. 7. **Page 2.15-16 Regional Transportation Plans & Programs.** Please refer to DEIR general comment #7 above.

L4-16. 8. **Page 2.15-22 Regional Roadway Facilities.** Second paragraph, last sentence, these were not the only evaluation impact assessments used. A number of performance measures were used to evaluate regional facilities. This should be clarified.

L4-17. 9. **Page 2.15-96: Table 2.15-28 Criteria for Accepting LOS E/F Roads.** A previous comment was submitted January 16, 2009 suggesting the addition of walkability to the "Criteria"

Comment Letter L 4, San Diego Association of Governments (SANDAG) (cont.)

L4-17. cont. column. The County's response to this comment was that it was added. The table does not appear to have incorporated a walkability criterion.

Conclusion

L4-18. We appreciate the opportunity to comment on the Draft EIR for the San Diego County General Plan Update project. SANDAG will be submitting a separate letter of comment on the Draft General Plan text and alternative land use maps in mid-September.

If you have any questions or concerns regarding SANDAG's comments on the DEIR, please contact me at 619-699-1943 or sba@sandag.org.

Sincerely,

Susan Baldwin

SUSAN BALDWIN
Senior Regional Planner

RSA/SBA/vpe

Responses to Letter L 4, San Diego Association of Governments (SANDAG)

L4-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L4-2 In the Congestion Management Program (CMP) section under DEIR Section 2.15.2.3 Local, the following text has been added to replace references to the County's participation in the CMP:

"The San Diego region has elected to be exempt from the State CMP and, as a result, the County Board of Supervisors adopted a resolution electing to be exempt from the State CMP. Existing CMP monitoring, threshold levels, guidelines and mitigation strategies will be incorporated into other SANDAG plans and/or programs as a result."

Mitigation measure TRA-1.6 has been revised to replace "SANDAG CMP" with "Congestion Management Strategies identified in the Regional Transportation Plan (RTP)."

The Level of Service (LOS) section under the Background Material section of the Mobility Element has also been modified to reflect that SANDAG and County have elected to be exempt from the State CMP program.

L4-3 In response to this comment concerning consistency with the 2030 SANDAG RTP, the County has reevaluated the draft General Plan Mobility Element Road Network and has made preliminary revisions to the classifications as follows to be consistent with the 2030 SANDAG RTP Unconstrained Revenue scenario. Ultimately the Board of Supervisors will determine which network is adopted. Preliminary recommendations to the board of Supervisors are provided below.

- SR-67 [Scripps Poway Parkway to Mapleview Street] - classification has changed from 6.2 Prime Arterial to 4.1A Major Road with Raised Median
- SR-78 [Ash Street to Main Street] - classification has changed from 4.2 Boulevard to 2.2D Light Collector with Improvement Options
- SR-94 [Jamacha Road to Jamul Subregion boundary] - classification has changed from 6.2 Prime Arterial to 4.1A Major Road with Raised Median

The County does not concur that the classification for SR-188 should change due to the planned development in the Tecate Sponsor Group area and the forecast volume on SR-188.

After a subsequent telephone conversation with SANDAG (Heather Werdick), the County has confirmed that the Mobility Element classifications for SR-76 are consistent with the 2030 RTP Unconstrained Revenue scenario.

L4-4 This comment focuses on the wording of the draft General Plan and does not address the adequacy of the EIR.

Responses to Letter L 4, San Diego Association of Governments (SANDAG) (cont.)

The following text has been added to the Rail Facilities section of the draft Mobility Element:

"The High Speed Rail alignment would originate in Downtown San Diego linking University City, Escondido, Riverside County, and Los Angeles via the San Diego-Los Angeles-San Luis Obispo Rail Corridor Agency (LOSSAN), Miramar Road/ Carroll Canyon Road, and Interstate 15 corridors."

L4-5 This comment focuses on the wording of the draft General Plan and does not address the adequacy of the EIR.

"Lindbergh Field" has been replaced with "San Diego International Airport" where it appears throughout the draft Mobility Element.

L4-6 Per the recommendation in the comment, the draft Mobility Element Policy M-8.1, Transit Service for Transit-Dependent Populations, has been amended with an additional bullet, which reads:

"Maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit only lanes."

L4-7 The County appreciates this comment but does not agree and has opted to include all the tables at the end of each section of the EIR.

L4-8 The County appreciates and acknowledges this updated information. All references to MOBILITY 2030 will be changed to 2030 RTP: Pathways for the Future" since the plan was adopted November 2007. However, references to the 2006 RTIP will remain in the DEIR since the 2008 RTIP was not adopted until July 2008, which is after April 2008, which is the when the Notice of Preparation (NOP) was circulated and established as the baseline for the EIR.

L4-9 In DEIR Section 2.15-4 Existing Roadway Network Performance in the last sentence of the last paragraph, the text was changed as recommended to reflect a "LOS F," rather than "LOS E."

L4-10 The County does not concur that it is necessary to identify current losses in paratransit since the baseline existing conditions identified in the DEIR describe conditions on or around April 2008, which is the when the NOP was circulated for public review. This is consistent with Section 15125 of the CEQA Guidelines, which states, "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published."

L4-11 DEIR Section 2.15.1.1 Unincorporated County, under the subheading "Rail Service" was revised from "San Diego-Los Angeles-San Luis Obispo corridor" to "Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor," as recommended.

Responses to Letter L 4, San Diego Association of Governments (SANDAG) (cont.)

L4-12 DEIR Section 2.15.1.1 Unincorporated County, under the subheading "Rail Service" was revised to reflect SPRNTER operates "between Oceanside and Escondido," rather than on the "Los-Angeles-San Diego-San Luis Obispo" corridor. All references to "Sprinter" changed to "SPRINTER" throughout document.

L4-13 A "COASTER Rail Service" heading has been added to DEIR Section 2.15.1.1 Unincorporated County, under the subheading "Rail Service," as recommended. In addition, all references to "Coaster" have been changed to "COASTER" throughout document.

L4-14 In DEIR Section 2.15 Transportation and Traffic, all references to "MetroLink" have been changed to "Metrolink" throughout document.

L4-15 The comment refers the reader back to comment L4-8. No further response is provided.

L4-16 In DEIR Section 2.15.3.1 Issue 1: Unincorporated County Traffic and LOS Standards under the "Regional Roadway Facilities" subheading, the last sentence has been revised to include "In addition to other performance measures..." at the beginning of the sentence.

L4-17 DEIR Table 2.15-28 has been revised under the Town Centers section to include "impede bicycle and pedestrian circulation" as a criteria for accepting LOS E/F roads, as recommended and the format of the table has been changed to be consistent with draft General Plan Mobility Element Policy M-2.1, Level of Service Criteria.

L4-18 This is a concluding comment and does not raise a significant environmental issue for which a response is required.

Comment Letter L 5, San Diego County Regional Airport Authority

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

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August 31, 2009

Mr Devon Muto
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: SDCRAA comments on County of San Diego Draft Environmental Impact Report for Draft General Plan Update and Draft General Plan Update

Dear Mr Muto:

L5-1. As the Airport Land Use Commission (ALUC) for San Diego County, the San Diego County Regional Airport Authority (SDCRAA) appreciates the opportunity to provide comments on the draft Environmental Impact Report (EIR) for the draft County of San Diego General Plan Update and acknowledge County staff responses to previous SDCRAA comments on the draft General Plan Update.

Previous Draft General Plan Comments

L5-2. Based upon previous SDCRAA comments (in a letter to Bob Citrano dated January 13, 2009), we appreciate the text changes that have been made to the draft General Plan which recognize the SDCRAA's statutory role as the ALUC in the County's land use authority.

L5-3. The County response to our previous comments directed our review to Implementation Plan sections 4.1.5 Airports and 6.7.1 Airport Land Use Compatibility, which we assumed to be within Chapter 9 (Implementation Plan) of the draft General Plan. We discovered the Implementation Plan matrix sections referenced in a separate document, and thus highly advise that that entire Implementation Plan matrix be integrated into the actual General Plan text, presumably as part of Chapter 9. This would facilitate review and implementation by all interested parties.

L5-4. While our requested changes were largely made, we do reiterate that the General Plan itself, including the ultimately adopted Land Use Maps appendix, must be referred to the SDCRAA, acting as the ALUC, for a consistency determination with all applicable, adopted Airport Land Use Compatibility Plans (ALUCPs).

Content Issues within EIR

L5-5. The discussion of McClellan-Palomar Airport in Section 2.7.1.2, Airport Hazards, Airport Transportation, McClellan-Palomar Airport makes reference to it having two regularly scheduled airlines and two service destinations. At present, only one

Comment Letter L 5, San Diego County Regional Airport Authority (cont.)

L5-5. cont. commercial airline serves this airport, with Los Angeles as the sole service destination. Historically, Las Vegas, Laughlin, and Phoenix have been other destinations served by commercial carriers from McClellan-Palomar Airport.

L5-6. In addition to the six public airports located within the unincorporated County, additional land use impacts to County jurisdiction lands may result from existing and planned ALUCPs. While located within and operated by the City of San Diego, Brown Field Municipal Airport has an existing ALUCP whose compatibility requirements affect

L5-7. lands under County jurisdiction. Adequate discussion and analysis of this ALUCP's impacts must be considered in the applicable EIR chapters.

L5-8. Moreover, the SDCRAA is currently proposing new ALUCPs for Brown Field and Gillespie Field, and each of these ALUCPs would have land use compatibility impacts upon lands within County jurisdiction. These impacts would exceed the current EIR reference to the existing Gillespie Field ALUCP having noise contour impacts within the Lakeside Community Plan Area. It is likely that both noise contour and safety zone impacts would extend into County jurisdiction lands from both the new Gillespie Field and Brown Field ALUCPs as well. Therefore, should these new ALUCPs be adopted prior to the prospective certification of the County General Plan EIR (and ALUCP adoption is tentatively anticipated in late 2009), it shall be incumbent upon the County General Plan EIR to include discussion and analysis of the new ALUCPs in fair disclosure of prospective impacts.

L5-9. Tables 2.7-7 and 2.7-8 are not appropriate and should be omitted from the EIR, with all EIR text references to the same modified accordingly. The Public Airport Safety Zone Compatibility Requirements is too generic to be referenced in an EIR. Each ALUCP contains unique, airport-specific compatibility requirements such that the generic figures cited in Table 2.7-7 would be misleading. A prospective user of Table 2.7-7 would infer much different compatibility requirements and impacts than are actually provided for within the ALUCPs. It is our recommendation to eliminate the entire table and instead note that specific compatibility requirements are provided for within each ALUCP. The Safety Zone descriptions of that table are already provided for in Table 2.7-6, so no important information would be lost by eliminating Table 2.7-7.

Similarly, Table 2.7-8 is derived from a previous ALUCP for MCAS Miramar, for which a new ALUCP was adopted in 2008. Thus, the information in Table 2.7-8 is outdated and would be misleading to prospective users given the much greater complexity in the compatibility requirements of the new ALUCP. Additionally, an ALUCP for MCAS Camp Pendleton was also adopted in 2008, and it has its own unique compatibility requirements, rendering Table 2.7-8 inaccurate.

L5-10. Given that ALUCPs for the two U.S. Marine Corps facilities, Miramar and Camp Pendleton, were adopted in 2008, the EIR should make proper reference to the ALUCPs as planning guidance documents to supplement the text in Section 2.7.1.2 Airport Hazards, Military Airports Hazard Prevention, and in Section 2.7.3.6 Issue 6: Private Airports, Impact Analysis and Federal, State and Local Regulations and Existing

Comment Letter L 5, San Diego County Regional Airport Authority (cont.)

L5-11. Regulatory Processes. It should be noted that the military airport ALUCPs are based upon Air Installations Compatible Use Zones (AICUZ) pursuant to State requirements, and thus, land use compatibility with the ALUCPs ensures consistency with the AICUZ from which they are derived.

L5-12. In at least three instances, the EIR text definitively states that the County requires projects to comply with ALUCPs (Section 2.7.3.5, Issue 5: Public Airports, Federal, State and Local Regulations and Existing Regulatory Processes; Summary; and Section 2.7.7.5, Issue 5: Public Airports). Until such time as the ALUC has made the determination that the General Plan is consistent with applicable ALUCPs and the County has implemented zoning requirements to effectuate such compliance, it is somewhat premature to make and repeat such a declarative statement in the EIR. The Implementation Plan (6.7.1.C) more conservatively refers to policy actions the County would undertake to implement the ALUCPs, including referral of legislative actions to the SDCRAA, acting as the ALUC, and Zoning Ordinance regulations of property within Airport Influence Areas (AIAs). It is recommended that the referenced EIR text be aligned more with the text of the Implementation Plan so that the process is accurately described in the context of component policy actions by the County.

L5-13. With the addition of Goal LU-4.7 to the draft General Plan, acknowledging the ALUC's role in land use planning, it would be appropriate to include reference to Goal LU-4.7 with the other General Plan Goals and Policies cited in Section 2.7.3.5, Issue 5: Public Airports, Proposed General Plan Update Goals and Policies. Likewise, it would be appropriate to include in the same section the phrase about ensuring consistency with

L5-14. ALUCPs which was added to Goal M-7.1 of the draft General Plan.

L5-15. The final statement at the end of Section 2.11.2.2, State, California Airport Land Use Planning Handbook, should be modified at a minimum, if retained. The assertion that 'the handbook recommends an annual CNEL standard of 60 dBA to be used for new residential development' is a generalization not so definitively declared in the California Airport Land Use Planning Handbook. While this inference can be made from a chart within the handbook, replicated as Table 2.11-7 in the EIR, this does not extrapolate to broad application, particularly when this sound level threshold frequently requires attenuation or is even considered incompatible with some residential and other land uses per the ALUCPs.

L5-16. Similarly, the final sentence which concludes Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, Guidelines for Determination of Significance, can be misleading. This asserts that the level of acceptable noise for new development within the vicinity of existing or proposed civilian airports or military airports proposed for conversion to civilian use is an annual CNEL of 60 dBA. There are numerous land uses considered acceptable by the ALUCPs within noise contours exceeding 60 dB CNEL, with or without attenuation as indicated within the ALUCPs.

L5-17. Section 2.11.6.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, Mitigation Measures, Noi-5.1 (as well as Section 6.8.2.J of the

Comment Letter L 5, San Diego County Regional Airport Authority (cont.)

L5-17. cont. Implementation Plan) should be reworded to ensure coordination with the ALUC in the review of development projects located within the AIAs of the ALUCPs. The ALUC has statutory purview to review *all* projects, whether considered incompatible or not with the ALUCPs, until such time as the County General Plan and implementing Zoning Ordinance has been deemed consistent with all applicable ALUCPs, and the ALUC retains review responsibility even thereafter of legislative actions.

L5-18. As indicated in our previous comment letter on the draft General Plan, we find the Table 2.11-9 in the EIR (Table N-1 in the draft General Plan) to be too generic and in conflict with several of the ALUCP sound level standards. Further, we again strongly recommend that the EIR Table 2.11-10 (Table N-2 in the draft General Plan) be integrated by text or footnotes into a single table with the larger land use categories in order to ease facility of use by prospective reviewers. Otherwise, one might infer that the noise compatibility guidelines alone are sufficient for determining acceptability of noise levels. At a minimum, the same caveat regarding ALUCP noise standards which has been appended to the table in the draft General Plan should also be added to the same within the EIR.

L5-19.

L5-20.

Spelling/Name, Grammar, or Reference Errors in EIR

L5-21. The following errors in spelling, names, grammar, or references should be corrected as noted within the EIR text:

- Correct to '**Lindbergh**' (not Lindberg) Field in Section 2.7.1.2, Airport Hazards, Airport Transportation
- L5-22. Change the final sentence in Section 2.7.1.2, Airport Hazards, Airport Transportation to indicate that the airports named and discussed thereafter are all the **County-owned** airports, not all of the airports in the county.
- L5-23. Omit 'Hot Springs' from Agua Caliente County Park (this is redundant and not part of its official name): 2 times in Section 2.7.1.2, Airport Hazards, Airport Transportation, Agua Caliente Airstrip
- L5-24. Correct to '**Naval**' (not Navel) airports: 2 times in Section 2.7.1.2, Airport Hazards, Airport Types, Military Airports and 2 times in Section 2.7.7.6, Issue 6: Private Airports, Impact Analysis
- L5-25. In Section 2.7.1.2, Airport Hazards, Airport Types, Military Airports, add the word 'airport' to the sentence: 'A portion of the MCAS Miramar **airport** influence area…'
- L5-26. Correct to Fallbrook Community '**Airpark**' (not Airport): 2 times in Section 2.7.3.5, Issue 5: Public Airports, Impact Analysis and Summary and once in Section 2.7.7.5, Issue 5: Public Airports
- L5-27. In Section 2.7.3.5, Issue 5: Public Airports, Impact Analysis, correct the airport location map to be Figure **2.7-3** (not 2.7-4)
- L5-28. In Section 2.7.6.5, Issue 5: Public Airports, Mitigation Measures, Haz-1.3, change the term 'influence area' to '**study** area', which is the term used by the AICUZ (airport influence area is a term used by the ALUCPs)

Comment Letter L 5, San Diego County Regional Airport Authority (cont.)

L5-29. • In Section 2.11.2.3, Local, Airport Land Use Compatibility Plans (ALUCPs), make 'AIA' plural in the sentence: 'ALUCPs include policies that address noise compatibility issues associated with airports and their respective **AIAs**.'

L5-30. • In Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, Impact Analysis, add the phrase '**or greater**' to all references to a 60 dBA noise contour so that is understood that the discussion and analysis refers to all noise level contours of 60 dBA or greater, rather than merely a 60 dBA noise level contour alone

L5-31. • Change the word 'with' to 'within' in the sentence beginning 'Within the Desert Subregion,…are located **within** the 60 dBA…Airport' in Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, Impact Analysis

L5-32. • In the next sentence after the preceding one, change 'that' to 'than': 'A very small area, less **than** one acre….' and eliminate 'Airport' from the name of Gillespie Field in Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, Impact Analysis

L5-33. The preceding comments in this letter represent our considered reading of the draft County General Plan and its draft EIR. These may not necessarily be inclusive of all potential concerns, as continued coordination between SDCRAA and County staff will be important to ultimately address General Plan consistency with the adopted ALUCPs. Of particular note, the comments within this letter should not be construed to take the place of a formal consistency determination by the SDCAA, acting as the ALUC.

Please contact me at (619) 400-2464 or ssawa@san.org should you have any additional questions.

Sincerely,

Sandi Sawa

Sandi Sawa
Manager, Airport Planning
San Diego County Regional Airport Authority

cc: Amy Gonzalez, SDCRAA, Director, Counsel Services

Responses to Letter L 5, San Diego County Regional Airport Authority

L5-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L5-2 This comment acknowledges the incorporation of prior San Diego County Regional Airport Authority (SDCRAA) comments into the draft General Plan Update. The County appreciates this comment and no further response is required.

L5-3 The County appreciates this comment but does not concur that the draft Implementation Plan should be part of the General Plan Regional Elements. The Implementation Plan is meant to be a fluid document that serves as an action plan where changes can be made as needed.

L5-4 The County agrees that the General Plan Update, including the Land Use Map, must be referred to the SDCRAA for consistency determination with all applicable, adopted Airport Land Use Compatibility Plans (ALUCPs), as addressed by draft Implementation Plan Measure 6.7.1.C, Airport Land Use Compatibility Plans.

L5-5 The County agrees with this comment and has revised DEIR Section 2.7.1.2, Airport Hazards, to read as follows:

"McClellan-Palomar Airport primarily serves general aviation users, but also serves corporate aircraft. One commercial airline serves this airport, with Los Angeles as the sole service destination. Historically, Las Vegas, Laughlin, and Phoenix have been other destinations served by commercial carriers from McClellan-Palomar Airport. ~~, and two regularly scheduled airlines (America West and United Express), which provide non-stop service to Phoenix and Los Angeles.~~"

L5-6 The DEIR does not consider draft plans, including Airport Land Use Compatibility Plans (ALUCPs) that are not adopted. Based upon the SDCRAA website, the following airports are in the process of updating, or recently adopted, their ALUCPs: Brown Field, Gillespie Field, Montgomery Field, McClellan-Palomar Airport, and Oceanside Municipal Airport. These updated ALUCPs are in draft form and were not released for public review and comment until May 8, 2009. However, existing conditions provided in the DEIR describe conditions on or around April 2008, which is the when the Notice of Preparation was circulated for public review and therefore is the date established for the data baseline. This is consistent with Section 15125 of the CEQA Guidelines, which states, "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published." Therefore, no revisions were made to the DEIR in response to this comment. The DEIR does consider adopted ALUCPs for the six public airports located in the unincorporated County in Section 2.7.3.5, Issue 5: Public Airports, under the heading, Impact Analysis. (See also response to comment L5-8 below.)

L5-7 This County agrees with this comment and has added a sentence to DEIR Section 2.7.3.5, Issue 5: Public Airports, that acknowledges an existing ALUCP (October 2004) for Brown Field Municipal Airport, which has compatibility requirements that affect land under the County's jurisdiction. See DEIR text changes below.

Responses to Letter L 5, San Diego County Regional Airport Authority (cont.)

"Within the unincorporated County of San Diego, there are six public airports, including Fallbrook Community Airport, Borrego Valley Airport, Ocotillo Airport, Ramona Airport, Agua Caliente Airstrip, and Jacumba Airport. Figure 2.7-4 identifies the location of airports throughout the County. Each of these airports have adopted ALUCPs that guide nearby property owners and local jurisdictions in determining what types of proposed new land uses are appropriate around airports. Brown Field Municipal Airport, located within and operated by the City of San Diego, also has an existing ALUCP whose compatibility requirements affect lands within County jurisdiction. These ALUCPs are largely based ….".

L5-8 This comment contends that the new ALUCPs for Brown Field and Gillespie Field would have land use compatibility impacts upon lands within County jurisdiction. Draft General Plan Policies S-15.1, Land Use Compatibility, and N-4.9, Airport Compatibility, recognize the need for a development project to comply with adopted ALUCPs because it requires that land uses surrounding airports be compatible with airport operations. In addition draft Implementation Plan Measure 6.7.1.C, Airport Land Use Compatibility Plans, requires the County update the General Plan, as applicable, to be consistent with ALUCPs within 180 days of ALUCP adoption.

Additionally County staff has been involved in the drafting and identification of possible impacts to County lands throughout the ALUCP adoption process. This has resulted in procedures that require that projects submitted to the County be reviewed to assure compliance with adopted ALUCPs when applicable. The review procedures will continue for the County lands within the Airport Influence Areas (AIA) of the Gillespie Field and Brown Field. Therefore, the General Plan EIR does not need to be updated since prospective impacts (safety and noise) associated with land uses within the Gillespie and Brown Field AIAs are currently being reviewed and analyzed by County staff to ensure they are compatible.

L5-9 The County agrees with this comment and has deleted Tables 2.7-7 and 2.7-8 from DEIR Section 2.7, Hazards and Hazardous Materials. The deletion of these tables does not result in any new significant environmental impacts, an increase in the severity of previously identified project impacts, or new feasible project alternatives or mitigation measures.

L5-10 The County disagrees that this information should be included in the DEIR. As discussed in response to comment L10-6, the existing conditions provided in the DEIR describe conditions on or around April of 2008, which is the when the Notice of Preparation was circulated for public review and therefore is the date established for the data baseline. The two new ALUCPs for MCAS Miramar and MCAS Camp Pendleton were adopted in October 2008 and June 2008, respectively, after the Notice of Preparation was issued and the baseline was established. Therefore, no revisions were made to the DEIR in response to this comment.

L5-11 This comment does not raise a significant environmental issue for which a response is required.

Responses to Letter L 5, San Diego County Regional Airport Authority (cont.)

L5-12 The County disagrees that the wording used in draft Implementation Plan Measure 6.7.1.C, Airport Land Use Compatibility Plans, should replace the more definitive wording in the DEIR that states that the County requires projects to comply with ALUCPs. The wording concerning ALUCPs used in the draft Implementation Plan Measure 6.7.1.C and the DEIR (Section 2.7.3.5, Issue 5: Public Airports) refer to different processes. The wording used in the DEIR describes a component of the unincorporated County development permitting process, which requires that proposed development projects comply with ALUCPs prior to approval. The wording used in the draft Implementation Plan refers to a process to be implemented upon adoption of the General Plan Update that would promote coordination between the Airport Land Use Commission (ALUC) and the County during the preparation of ALUCPs and future revisions to ALUCPs. Therefore, no revisions were made to the DEIR in response to this comment.

L5-13 The County agrees that a reference to draft General Plan Update Goal LU-4, Inter-jurisdictional Coordination, and Policy LU-4.7, Airport Land Use Compatibility Plans, should be made in the DEIR under Section 2.7.3.5, Issue 5: Public Airports, under the heading Proposed General Plan Update Goals and Policies. Therefore, this section has been revised to include a reference this goal and policy.

L5-14 The County does not agree with this comment. The descriptions in DEIR Section 2.7.3.5, Issue 5: Public Airports, under the subheading "Proposed General Plan Update Goals and Policies", of draft General Plan Goal M-7, Airport Facilities, and Policy M-7.1, Meeting Airport Needs, provide a summary of the proposed General Plan Update goals and policies, rather than a verbatim description. As such, the revision to Policy M-7.1 in the General Plan Update does not require a revision to this section of the DEIR because the general content of the policy did not change. Therefore, no changes were made to the DEIR in response to this comment.

L5-15 The County agrees with this comment and has revised DEIR Section 2.11.2.2, State Regulations, under the heading California Airport Land Use Planning Handbook, as follows:

"The California Airport Land Use Planning Handbook provides guidance for the assessment of noise compatibility of land uses near airports. Guidance is based on existing federal and State regulations and policies. The handbook states that 65 dBA is the basic limit of acceptable noise exposure for residential and other noise sensitive land uses <u>and recommends an annual CNEL standard of 60 dBA to be used for new residential development;</u> however, this standard has been set with respect to relatively noisy urban areas and <u>may</u> ~~would~~ be too high of a noise level to be appropriate as a standard for land use compatibility planning. The level of noise deemed acceptable in one community is not necessarily the same in another. <u>A noise level above 60 dBA CNEL may be considered incompatible with some residential uses.</u> According to the handbook, noise compatibility standards typically place primary emphasis on residential areas because residential development is one of the most noise sensitive land uses and usually covers the greatest proportion of urban land. Three CNELs are commonly used as the limit for acceptable residential noise exposure: CNEL 65 dBA, 60 dBA, or 55 dBA. The conditions in which each

Responses to Letter L 5, San Diego County Regional Airport Authority (cont.)

CNEL would be the suggested noise standard are listed in Table 2.11-7. The handbook also includes normalization factors as a method for adjusting aircraft noise levels used for determining and predicting community reactions. These factors are listed in Table 2.11-8. The handbook recommends an annual CNEL standard of 60 dBA to be used for new residential development. Because the acceptable residential noise level standard may vary between communities, noise compatibility issues are addressed in the Airport Land Use Compatibility Plans (ALUCPs) prepared for individual airports."

L5-16 The County disagrees that the DEIR requires revision because DEIR Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, identifies that some land uses are considered acceptable in ALUCPs within the 60 dBA CNEL noise contour. As stated in the Impact Analysis for this section, use of the 60 dBA CNEL noise contour assumes that the entire acreage would be developed with noise sensitive land uses, which is unlikely to occur. It is possible that the entire acreage within the contour would be developed with land uses that would be compatible with noise levels above 60 dBA according the Noise Compatibility Guidelines identified in DEIR Table 2.11-9. However, for the purposes of the programmatic EIR, a threshold of 60 dBA CNEL represents a conservative analysis of impacts. As shown in DEIR Table 2.11-9, Noise Compatibility Guidelines, 60 dBA is the highest noise level acceptable to all land uses. Therefore, 60 dBA is an acceptable threshold to use for the DEIR. No changes were made to the DEIR in response to this comment.

L5-17 The County agrees that mitigation measure Noi-5.1 in Section 2.11.6.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, should be revised to require ALUC review of all projects within the Airport Influence Area (AIA) of an ALUCP. As a result of this comment, mitigation measure Noi-5.1 has been revised as follows:

Noi-5.1 Use the applicable Airport Land Use Compatibility Plan's (ALUCP) as guidance/reference during development review of projects that are planned within an Airport Influence Area (AIA). Any projects that are within the AIA ~~found incompatible with the Airport Land Use Compatibility Plan noise criteria should~~shall be submitted to the SDCAA for review by the SDCAA.

L5-18 The County disagrees that DEIR Table 2.11-9, Noise Compatibility Guidelines, is too generic and conflicts with ALUCP standards. Table 2.11-9 is intended to provide a general reference table for noise levels that would normally be acceptable for broadly defined land uses. This table includes all noise sources and is not intended to implement the noise standards of any ALUCP. As stated in DEIR Section 2.11.2.3, Local [regulations pertaining to noise], the proposed Noise Compatibility Guidelines identified in Table 2.11-9 indicate ranges of compatibility and are intended to be flexible enough to apply to a variety of projects and environments. The General Plan Update requires consistency with ALUCPs in General Plan Update Policy N-4.9, Airport Compatibility, which requires that the noise compatibility of any development projects that may be affected by noise from public or private airports and helipads be assured with appropriate agencies such as the SDCRAA, and draft General Plan

Responses to Letter L 5, San Diego County Regional Airport Authority (cont.)

Policy S-15.1, Land Use Compatibility, from the draft Safety Element, which requires land uses surrounding airports to be compatible with the operation of each airport. Therefore, DEIR Table 2.11-9 does not conflict with ALUCP standards. No changes were made to the DEIR in response to this comment.

L5-19 The County agrees with this comment and has modified DEIR Table 2.11-10, Noise Standards (Table N-2 in the General Plan Update), to include the following footnote:

"Note: Exterior Noise Level compatibility guidelines for Land Use Categories A-H are identified in Table 2.11-9, Noise Compatibility Guidelines"

This footnote provides further clarification so that readers will not infer that the noise compatibility guidelines alone are sufficient for determining the acceptability of noise levels.

L5-20 The County agrees with this comment and has revised Table 2.11-9, Noise Compatibility Guidelines, to include the following footnote:

"Note: For projects located within an Airport Influence Area of an adopted Airport Land Use Compatibility Plan (ALUCP), additional Noise Compatibility Criteria restrictions may apply as specified in the ALUCP."

L5-21 The County agrees with this comment and the suggested spelling change has been made in DEIR Section 2.7, Hazards and Hazardous Materials.

L5-22 The County agrees with this comment and the wording in the final sentence under the subheading "Airport Transportation" in DEIR Section 2.7.1.2, Airport Hazards, has been modified.

L5-23 The County agrees with this comment and has omitted "Hot Springs" from the name of Agua Caliente County Park in DEIR Section 2.7.1.2, Airport Hazards, under the subheading "Airport Transportation."

L5-24 The County agrees with this comment and the suggested spelling change has been made throughout DEIR Section 2.7, Hazards and Hazardous Materials.

L5-25 The County agrees with this comment and the wording in Section 2.7.1.2, Airport Hazards, under the subheading "Military Airports" has been revised to include the word "airport."

L5-26 The County agrees with this comment and "Fallbrook Community Airport" has been changed to "Fallbrook Community Airpark" in several places in DEIR Section 2.7, Hazards and Hazardous Materials.

L5-27 The County agrees with this comment and the reference to DEIR Figure 2.7-4 in Section 2.7.3.5, Issue 5: Public Airports under the subheading "Impact Analysis" has been changed to Figure 2.7-3.

Responses to Letter L 5, San Diego County Regional Airport Authority (cont.)

L5-28 The County agrees with this comment and the wording “influence area” has been changed to “study area” in mitigation measure Haz-1.3 in DEIR Sections 2.7.6.5 and 7.2.7.5 and to Implementation Plan Measure 6.7.1.D Military Air Facilities.

L5-29 The County agrees with this comment and the suggested change has been made to DEIR Section 2.11.2.3, Local [noise regulations].

L5-30 This comment requests that the Impact Analysis discussion in DEIR Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport, be revised so that all references to the 60 dBA noise contour state “60 dBA noise contour or greater.” This suggested revision would not be accurate; therefore, it was not implemented. The impact analysis considered all sensitive land uses within the 60 dBA noise contour. This noise contour includes all noise contours for higher noise levels, but the analysis did not determine what specific land uses would be within a higher noise level contour as well as within the 60 dBA noise contour. The impact analysis takes a more conservative approach than the suggested revisions would imply because it assumes that all sensitive land uses would be sensitive to noise levels as low as 60 dBA, even though some land uses considered sensitive would be compatible with noise levels in excess of 60 dBA.

L5-31 The County agrees with this comment and has made the suggested revision to the Impact Analysis discussion in DEIR Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport.

L5-32 The County agrees with this comment and has made the suggested revision to the Impact Analysis discussion in DEIR Section 2.11.3.5, Issues 5 and 6: Excessive Noise Exposure from a Public or Private Airport.

L5-33 The County acknowledges that the comments provided in the SDCRAA letter may not be inclusive of all potential concerns and that a formal consistency determination by the SDCAA, acting as the ALUC, will still be required.

Comment Letter L 6, San Diego County Water Authority

San Diego County Water Authority
4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

August 27, 2009

Mr. Devon Muto
County of San Diego DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: Comments on the County of San Diego General Plan Update Draft Environmental Impact Report

Dear Mr. Muto:

L6-1. Thank you for providing the San Diego County Water Authority (Water Authority) with a copy of the above-referenced document. The Water Authority has reviewed the relevant portions of the document and offers the following comments.

- **Section 2.8 Hydrology and Water Quality:**

L6-2.
  - **Pg. 2.8**; Comment: Mitigation Measure Hyd-2.4 should be removed as a mitigation measure. This statement is already included under Policy LU-13.1 and Policy COS-4.1 directly above in the "General Plan Update Policies" section. Coordination is not considered to be mitigation.

- **Section 2.16 Utilities and Service Systems:**

L6-3.
  - **Pg. 2.16-2**; Comment: First paragraph under the heading "MWD, SDCWA, and SDCWA Member Water Districts", the first sentence should be modified to read: "In 2008, MWD provided approximately 71 percent of the total water supply…". The percent of imported water supply to the region varies from year to year, and the qualifier should be made that 71 percent number was for calendar year 2008.

L6-4.
  - **Pg.2.16-3**; Comment: At top of page, the sentence directly above the heading "Imported Water Supply Issues", should be modified to read: "…areas under normal water year, single dry water year, and multiple dry water year conditions through the year 2030, if Water Authority and member agency supplies are developed as planned, along with implementation of MWD's IRP."

Comment Letter L 6, San Diego County Water Authority (cont.)

- **Section 2.16 Utilities and Service Systems (cont.):**

L6-5. ○ **Pg. 2.16-3**; Comment: First paragraph, second sentence under "Imported Water Supply Issues", this sentence in inaccurate. The 2005 UWMPs ***did*** account for drought (i.e., multiple dry water year conditions) in the supply and demand projections. However, the sentence is accurate in that the current regulatory restrictions (i.e., cutbacks) on pumping from the State Water Project were not planned for in the 2005 UWMPs. Please revise this statement.

L6-6. ○ **Pg. 2.16-3**; Comment: Second paragraph, last sentence, should include both voluntary conservation and mandatory restrictions as ways to lessen the impacts on water availability to customers due to supply restrictions. Please revise this sentence to include these two factors.

L6-7. ○ **Pg. 2.16-3**; Comment: Fourth paragraph, last sentence should be modified to read: "In preparing 2010 UWMPs, MWD, SDCWA, and SDCWA member water districts ~~will need to~~ are going to account for these issues and will likely place more emphasis on conservation, water recycling, and expanding local supplies through methods such as seawater desalin~~i~~zation."

L6-8. ○ **Pg. 2.16-4**; Comment: Second paragraph, to clarify, MWD's IRP is ***not*** an IRWMP, and language regarding Prop 50 and Prop 84 funding should be stricken from this discussion of the MWD IRP. However, additional language should be added in the EIR discussing San Diego regional IRWMP efforts.

L6-9.

L6-10. ○ **Pg. 2.16-5**; Comment: Second paragraph under heading "San Diego County Water Authority (SDCWA)", the second sentence includes the statement that SDCWA is "importing from a single supplier". To clarify, SDCWA imports water from MWD, as well as through a transfer agreement with the Imperial Irrigation District (IID) and agreements for the lining of the All American and Coachella Canals, via the Quantification Settlement Agreement of October 2003. Please revise this statement.

L6-11. ○ **Pg. 2.16-5;** Comment: Third paragraph, first sentence, please revise the dates to "2002" for the Regional Water Facilities Master Plan, with an update to occur in "2012". Also, the last sentence of this paragraph should be changed to read: " This project ~~is in the process of receiving~~ has received final approvals from the required regulatory and permitting agencies…".

Comment Letter L 6, San Diego County Water Authority (cont.)

- **Section 2.16 Utilities and Service Systems (cont.):**

L6-12. ○ **Pg. 2.16-6**; Comment: First paragraph, at the end of the first sentence, modify to read: "…sufficient through 2030, if Water Authority and member agency supplies are developed as planned, along with implementation of MWD's IRP."

L6-13. ○ **Pg. 2.16-46**; Comment: First paragraph under the heading "*Urban Water Management Plans*", modify end of first sentence to read: "…areas under normal water year, single dry water year, and multiple dry water year conditions through the year 2030, if Water Authority and member agency supplies are developed as planned, along with implementation of MWD's IRP."

L6-14. ○ **Pg. 2.16-47**; Comment: First paragraph, fifth sentence, "Circumstances such as these have resulted in conditions that were not accounted for in 2005 UWMPs supply and demand projections." Again, it should be clarified here that the 2005 UWMPs ***did*** account for drought (i.e., multiple dry water year conditions) in the supply and demand projections, but they did not account for the current regulatory restrictions (i.e., cutbacks) on pumping from the State Water Project. Please revise the sentence to clarify this point.

L6-15. ○ **Pg. 2.16-48;** Comment: Second paragraph, last sentence, please revise this sentence to include as one of the 'unexpected factors' the regulatory constraints (i.e., cutbacks) on pumping of MWD supplies from the State Water Project.

L6-16. ○ **Pg. 2.16-49**; Comment: First paragraph, the last sentence describes short-term shortage restriction activities that are currently in place due to drought conditions, which are not related to long-range planning. This section should discuss the long-term conservation efforts, such as the Governor's 20x2020 Plan and other measures being considered.

L6-17. ○ **Pg. 2.16-53**; Comment: Last paragraph, under "Summary", second sentence should be revised to clarify that the planning documents did account for drought years, but did not account for regulatory restrictions (i.e. cutbacks).

L6-18. ○ **Pg. 2.16-70**; Comment: Modify **Policy COS-4.1: Water Conservation** to read: "Require new development to ~~R~~reduce the waste of potable water through use of efficient technologies and conservation efforts…".

Comment Letter L 6, San Diego County Water Authority (cont.)

- **Section 2.16 Utilities and Service Systems (cont.):**

L6-19. ○ **Pg. 2.16-71**; Comment: Modify mitigation measure **USS-4.2** to read: "Implement, and revise as necessary, the Count Green Building Program ~~with incentives for~~ to mandate development that is energy efficient and conserves resources, including both groundwater and imported water."

L6-20. The Water Authority appreciates the opportunity to comment. Please keep the Water Authority on the mailing list for future documents on this important project. If you have any questions, please contact me at (858) 522-6749, or Kelley Gage at (858) 522-6763.

Sincerely,

Dana Friehauf
Principal Water Resources Specialist

Cc: Ken Weinberg, SDCWA
Paul Lanspery, SDCWA

kg

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Responses to Letter L 6, San Diego County Water Authority

L6-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L6-2 The County appreciates this comment but does not agree with it. The County agrees that coordination alone is not mitigation but the second part of this measure is to "coordinate land use planning with water supply planning and implementation and enhancement of water conservation programs." The County acknowledges the overlap between the mitigation measure and reference policies. The reason that the mitigation measure remains relevant is that it contains an action that will implement the policies.

L6-3 The County agrees with this comment and the DEIR has been revised as suggested.

L6-4 The County agrees with this comment and the DEIR has been revised as suggested.

L6-5 The County agrees with this comment. The first paragraph under "Imported Water Supply Issues" has been revised in response to this comment by removing "and the statewide drought" from the first paragraph, second sentence of the DEIR Section 2.16.1.1 Potable Water Supply and Distribution under the heading Planning for Future Water Supply.

L6-6 The County agrees with this comment. In DEIR Section 2.16.1.1, under "Imported Water Supply Issues, the last sentence of the second paragraph has been revised as follows: "As a result, local water agencies have had to rely on contingency and emergency sources of water, including local groundwater and storage supplies, as well as voluntary and mandatory restrictions to lessen direct impacts on water availability for their customers."

L6-7 The County agrees with this comment and the EIR has been revised as suggested.

L6-8 The County agrees with this comment and the second sentence in the second paragraph in DEIR Section 2.16.1.1, Potable Water Supply and Distribution, under the heading "Metropolitan Water District" referring to the Integrated Water Resources Management Plan (IWRMP) has been deleted from the EIR.

L6-9 The County agrees with this comment and the following paragraph has been added to DEIR Section 2.16.1.1 Potable Water Supply and Distribution, under the heading "San Diego County Water Authority" to make reference to the San Diego IRWMP:

"In addition to the 2004 Regional Water Facilities Master Plan, the SDCWA, County of San Diego and City of San Diego collaboratively maintain an Integrated Regional Water Management Plan (IRWMP) for the San Diego region. The Final San Diego IRWMP, adopted in 2007, reflects a comprehensive approach to water resources planning that integrates ongoing local planning efforts in order to maximize regional water management benefits and resolve any existing or potential conflicts. The San Diego IRWMP identifies programs and projects that best achieve the region's goals to optimize water supply reliability, and protect and enhance water quality, while providing stewardship of natural resources. The 2007 San Diego IRWMP includes a

Responses to Letter L 6, San Diego County Water Authority (cont.)

description of the region and participants, regional objectives and priorities, water management strategies, implementation, impacts and benefits, data management, financing, stakeholder involvement, relationship to local planning, and State and federal coordination. IRWM planning was derived from California Proposition 50, approved by the voters in 2002, which set aside $380 million for IRWMP-related grants (SDIRWM 2010)."

In addition, the following reference has been added to DEIR Section 5.0 References:
San Diego Integrated Regional Water Management (SDIRWM 2010). Final Integrated Regional Water Management Plan. Accessed January 27, 2010. Online URL: http://www.rmcwater.com/clients/sdirwmp/plan.html

L6-10 The County agrees with this comment. DEIR Section 2.16.1.1 Potable Water Supply and Distribution, under the heading "San Diego County Water Authority" has been revised as follows:

"Because of the County's semi-arid climate and limited local water supplies, SDCWA provides up to 90 percent of the water used in the San Diego region~~, importing from a single supplier, MWD~~ by way of imported water from MWD, a transfer agreement with Imperial Irrigation District (IID) and agreements for the lining of the All American and Coachella Canals, via the Quantification Settlement Agreement of October 2003."

L6-11 The County agrees with this comment and the DEIR has been revised as suggested.

L6-12 The County agrees with this comment and the DEIR has been revised as suggested.

L6-13 The County agrees with this comment and the DEIR has been revised as suggested.

L6-14 The County agrees with this comment and the DEIR has been revised as suggested.

L6-15 The County agrees with this comment and the DEIR has been revised as suggested.

L6-16 The County agrees with this comment and DEIR Section 2.16.3.4 Issue 4: Adequate Water Supplies has been revised, under the heading "Alternative Water Supplies", to discuss the long-term conservation efforts, such as the Governor's 20x2020 Plan and other measures being considered. In addition, the appropriate reference has been cited in DEIR Section 5.0 References.

L6-17 The County agrees with this comment and the DEIR has been revised as suggested.

L6-18 The County agrees with this comment and the DEIR has been revised as suggested.

L6-19 The County does not agree with this comment. The County's Green Building Program is a voluntary incentive based program and therefore "mandating" requirements is not appropriate for this program. However, it should be noted that

Responses to Letter L 6, San Diego County Water Authority (cont.)

the County contains mandates related to water conservation in other programs such as its landscape regulations and County facilities policies.

L6-20 This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required.

Comment Letter L 7, San Diego County Water Authority (Comments on Draft General Plan Update)

San Diego County Water Authority
4677 Overland Avenue • San Diego, California 92123-1233
(858) 522-6600 FAX (858) 522-6568 www.sdcwa.org

August 27, 2009

Mr. Devon Muto
County of San Diego DPLU
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: Comments on the County of San Diego Draft General Plan Update

Dear Mr. Muto:

L7-1. Please find attached the Water Authority's comments on the County of San Diego's draft General Plan Update. The comments were previously submitted on January 16, 2009, via email correspondence. However, we noticed that there may have been an error in transmission and the County never received our comments. Please review the enclosed document and consider the comments when revising the draft Plan.

The Water Authority appreciates the opportunity to comment. Please don't hesitate to contact either Dana Friehauf at (858) 522-6749, or me at (858) 522-6763, if you have any questions.

Sincerely,

Kelley Gage

Kelley Gage
Senior Water Resources Specialist

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Comment Letter L 7, San Diego County Water Authority (Comments on Draft General Plan Update) (cont.)

San Diego County Water Authority
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January 16, 2009

Mr. Devon Muto
Chief, Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Comments on San Diego County Draft General Plan

Dear Mr. Muto:

L7-2. Thank you for the opportunity to comment on the County of San Diego's Draft General Plan. Coordination and communication on land-use and water supply planning is critical to ensure a reliable and sustainable water supply for San Diego County.

L7-3. Chapter 3, Land Use Element, of the Draft General Plan accurately summarizes the long-term water supply planning and strategies in place to provide adequate water supplies to meet future growth. In addition to the Water Authority's Urban Water Management Plan, which deals with long-term planning, the Water Authority's Board of Directors approved a Drought Management Plan (DMP) in 2006. The DMP provides potential actions that the Water Authority can take to minimize or avoid the impacts associated with supply shortage conditions due primarily to droughts. The DMP also contains a water supply allocation methodology to be used if the Water Authority is required to allocate supplies to its member agencies. Reference to the DMP in the General Plan Update would demonstrate that the region also has a plan to address short-term supply shortage situations. A copy of the DMP can be found on the Water Authority's website: http://www.sdcwa.org/manage/pdf/DroughtManagementPlanFinal.pdf

L7-4. Chapter 5, Conservation and Open Space Element, contains Goal COS-4.1 regarding water conservation. We would suggest that this goal be strengthened with the following language: "Require new development to reduce the waste of potable water through use of efficient technologies…" In order for the region to maintain a sustainable supply for future generations, we must grow in a manner that is most water efficient.

Comment Letter L 7, San Diego County Water Authority (Comments on Draft General Plan Update) (cont.)

Mr. Devon Muto
January 16, 2009
Page 2 of 2

L7-5. Thank you again for the opportunity to comment on the County's Draft General Plan. Please don't hesitate to contact me if you have any questions or comments, 858-522-6749, dfriehauf@sdcwa.org. I look forward to continuing coordination on the important linkage between land-use and water supply planning.

Sincerely,

Dana Friehauf

Dana Friehauf
Principal Water Resources Specialist

Responses to Letter L 7, San Diego County Water Authority (Comments on Draft General Plan Update)

L7-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required. The County appreciates the Water Authority's resubmittal of these comments.

L7-2 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L7-3 The following paragraph has been added to the Draft General Plan Land Use Element Community Services and Infrastructure context section under the Water Supply section:

"In addition to the UWMP, which deals with long term planning, SDCWA's Board of Directors approved a Drought Management Plan (DMP) in 2006. The DMP provides potential actions that the SDCWA can take to minimize or avoid the impacts associated with supply shortage conditions due primarily to droughts. The DMP also contains a water supply allocation methodology to be used if the SDCWA is required to allocate supplies to its member agencies."

L7-4 Draft General Plan Conservation and Open Space Element policy COS-4.1 has been amended to add, "Require development to" at the beginning of the policy, as recommended.

L7-5 This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required.

Comment Letter L 8, City of San Diego

THE CITY OF SAN DIEGO

August 31, 2009

County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: **CITY OF SAN DIEGO COMMENTS ON THE COUNTY OF SAN DIEGO GENERAL PLAN UPDATE DRAFT ENVIRONMENTAL IMPACT REPORT (SCH. 22002111067; EIR # 02-ZA-001)**

The City of San Diego ("City") has received and reviewed the Draft Environmental Impact Report ("DEIR") for the County of San Diego General Plan Update and appreciates this opportunity to provide comments to the County of San Diego. In response to the DEIR, the City has identified potential environmental issues that may result in a significant impact to the environment. Continued coordinated planning between the City, the County, and other local, regional, state, and federal agencies will be essential.

L8-1. Staff from the Development Services Department ("DSD"), the Public Utilities Department, and the Engineering and Capital Improvements Department (ECP) have reviewed the DEIR and have the following comments regarding the content of the DEIR:

DEVELOPMENT SERVICES DEPARTMENT: LABIB QASEM (619) 446-5358, LQASEM@SANDIEGO.GOV OR VICTORIA HUFFMAN AT (619) 446-5396 VHUFFMAN@SANDIEGO.GOV

GENERAL:

L8-2. 1. The document identifies significant traffic impacts to City of San Diego roadway segments because of future development projects in the County. These traffic impacts require mitigation through conditioning of future development projects within the County to contribute appropriate fair share funds to improve the roadway segments in the City of San Diego. Also, development projects in the County should be phased in order to minimize any potential traffic impacts on these roadway

L8-3. segments to correspond with actual improvements to the roadway segments.

2. The significance thresholds listed on Page 70 -71 of the *City of San Diego's Significance Determination Thresholds, January 2007* should be used to evaluate significant traffic impacts in the

L8-4. City of San Diego. The City of San Diego's current thresholds identify a significant traffic impact when the V/C of a roadway segment operating at LOS F increases by more than 0.01 and also when the delay at an intersection operating at LOS F increases by more than 1.0 second.

Comment Letter L 8, City of San Diego (cont.)

Page 2 of 7
County of San Diego
Department of Planning and Land Use
August 31, 2009

L8-5. **3.** Please clarify whether peak hour intersection operations have been evaluated, or when and whether they will be evaluated and through what process (e.g. Community Planning Area and Subregional Planning Area Updates, etc.). Intersections should be evaluated, and significant traffic impacts to
L8-6. intersections within the City of San Diego should be mitigated.

L8-7. **4.** The County should coordinate with the City of San Diego and other affected agencies for the development and financing of transportation infrastructure improvements such as the La Media Road Bridge and Via de la Valle from I-5 to east of El Camino Real. In addition, private County
L8-8. developments shall mitigate significant traffic impacts to the City's roadway network. The General
L8-9. Plan should address these potential infrastructure needs and identify funding for them.

L8-10. **5.** The County should coordinate with the City of San Diego and other affected agencies regarding the alignment and construction of SR-905 and SR-11 to provide freeway connection to the planned third border crossing. The General Plan Update should address this issue.

L8-11. **6.** The County should coordinate with the City of San Diego and other affected agencies regarding the construction of the future SR-125/Lonestar Road interchange which will provide freeway access to the County portion of eastern Otay Mesa. The General Plan Update should address this future infrastructure need.

L8-12. **7.** We appreciate the County's concern regarding traffic impacts to other agencies facilities. However, please use the word "mitigate" instead of "alleviate" in all locations in the General Plan Update with regard to addressing significant impacts to other agencies transportation facilities.

SPECIFIC:

L8-13. **Page 2.15-26, Issue 2: Adjacent Cities Traffic and LOS Standards,** the City of San Diego uses the thresholds identified in *City of San Diego's Significance Determination Thresholds, January 2007* (even thought they have only slight revisions from the Santec/ITE Guidelines for Traffic Impact Studies). Please note that Page 71 – 72 of the *City of San Diego's Significance Determination*
L8-14. *Thresholds, January 2007* contains significance thresholds for parking.

L8-15. **Page 2.14-47, Issue 2: Adjacent Cities Traffic and LOS Standards,** the sentence stating mitigation measures to improve adjacent jurisdictions' roadways would be infeasible because such improvements are outside the jurisdiction of the County should be removed from the DEIR. Jurisdiction does not automatically equal infeasibility. However, it is appropriately stated later in the same paragraph
L8-16. County development projects will be required to provide mitigation to impacted City roadways.

L8-17. **Page 2.15-48, Issue 2: Adjacent Cities Traffic and LOS Standards,** the word "alleviate" within the second sentence of Mitigation Measure Tra.-2.1 should be replaced with the word "mitigate" so that this sentence reads, "When available, use the applicable jurisdiction's significance thresholds and recommended mitigation measures to evaluate and mitigate impacts."

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L8-18. **Page 2.15-90,** provide a Measures of Significant Project Traffic Impacts table (similar to Table 2.15-23) for the City of San Diego.

L8-19. **Page 2.15-72, Table 2.15-16,** Airway Road between Michael Faraday Drive to SR-905 has fronting property on its south side rather than no fronting property; therefore, its LOS E capacity should be no more than 9,000 ADT.

L8-20. **Page 2.15-72, Table 2.15-16,** the segments of Siempre Viva Road evaluated are those between La Media Road to SR-905 and SR-905 to Enrico Fermi Dr. Please revise this table and other pertinent tables accordingly.

L8-21. **Page 2.15-72, Table 2.15-16,** Siempre Viva Road between La Media Road and SR-905 is not currently constructed as a 6-lane major arterial along this entire segment; therefore, assuming it has a LOS E capacity of 50,000 ADT for the entire segment is not appropriate. The segment of Siempre Viva Road from La Media Road east to Avenida Costa Brava/Melksee Street should have a LOS E capacity no greater than 22,500 ADT.

L8-22. **Page 2.15-72, Table 2.15-16,** Siempre Viva Road between SR-905 and Enrico Fermi Drive is not currently constructed as a 6-lane major arterial along this entire segment. It more closely resembles a 4-lane major roadway with LOS E capacity of 40,000 ADT.

L8-23. **Page 1, Appendix H, Traffic Impacts to Adjacent City Jurisdiction Report,** clarify on what basis the project study area was determined. La Media Road from Siempre Viva Road north to the City of

L8-24. San Diego/County border and Otay Mesa Road from the City of San Diego/County border west to I-805 should be included.

L8-25. **Appendix H, Traffic Impacts to Adjacent City Jurisdiction Report,** existing roadway ADTs should be based on actual traffic count data rather than derived from the SANDAG traffic model.

E&CP - TRANSPORTATION SYSTEMS & PROGRAMMING, FARAH MAHZARI,
(619) 533-3836 OR fmahzari@sandiego.gov

L8-26. We have reviewed the completed County of San Diego General Plan Update Traffic and Circulation Assessment study prepared by Wilson and Company dated July 1, 2009; and have the following comments:

L8-27. 1. Table 2.15-24, Page 2.15-90; indicates seven segments within the City of San Diego with significant traffic impacts. Please identify mitigations to these segments.

L8-28. 2. Table 2.15-7, Page 2.15-64; shows an increase of 357,401 ADT just within the Otay Mesa area of the County of San Diego. Within the Otay East Area, SANDAG's Model indicates a County development increase of approximately 160,000 ADT. There are only five ways in and out of the Otay East Area; La Media Rd., Otay Mesa Rd., SR-125, Siempre Viva Rd., and I-905/SR-

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L8-28. cont. 11. With this significant ADT increase, we would expect significant impacts to these roadway segments. The EIR should analyze each of these segments, identify the impacts and recommend mitigations.

L8-29. 3. SANDAG's Model assumes La Media Rd. is part of the Circulation Element in the Year 2030. As the County of San Diego, City of San Diego, and City of Chula Vista have discussed many times, the funding and timing of the La Media Rd. connection is unidentified. Therefore, a scenario without this connection should be studied to evaluate the impacts to surrounding roadways and identify recommended mitigations.

L8-30. **PUBLIC UTILITIES DEPARTMENT - JEFF PASEK, WATERSHED MANAGER, WATERSHED & RESOURCE PROTECTION (619) 533-7599 OR JPASEK@SANDIEGO.GOV**

GENERAL COMMENTS
All figures and maps: change Lakes to Reservoirs.

CHAPTER 3
LAND USE ELEMENT

L8-31. **Page 3.6** Land Use Framework
- Include Public Utilities lands in group of lands that are outside the jurisdiction of the County, e.g. tribal lands, military installations, State parks, etcetera…

L8-32. **Page 3-27, LU- 8.2, Aquifer and Groundwater Conservation.** Some of the study area covers the San Diego River Watershed; there is no mention of City's Pueblo Water Rights in this portion of the region nor does there seem to be any discussion on water rights in general. Include a discussion of water rights and how this basin has not been adjudicated.

L8-33. **Page 3-28**
- Add additional Policy LU- 8.5 Restrict Development in Prime Recharge Locations

L8-34. **Page 3.35**, Water Supply: The City of San Diego owns and maintains seven drinking source water reservoirs in the County. While these reservoirs do not provide potable water for residents outside the city they are used by County residents for recreation and provide valuable habitat.

L8-35. **Page 3-41** GOAL LU – 13
- Add 'and Protection' to goal title to read Adequate Water Quality, Supply, and Protection

L8-36.
- Add a third goal LU – 13.3 Source Water Protection. Protecting reservoir water quality requires that the quality of the water entering the reservoirs is maintained or improved. Pollutants of high concern are nutrients and related algae, total organic carbon, and total dissolved solids.

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L8-37. **CHAPTER 4**
MOBILITY
Page 4 – 12 Road Network, Road design, operation, and maintenance…

- Add and minimize runoff and pollutants entering county watersheds at end of paragraph.

L8-38. **CHAPTER 5**
CONSERVATION AND OPENSPACE ELEMENT
Page 5 – 2 Purpose and Scope

- Add groundwater under second bullet discussing *Water Resources*

Page 5 – 5 HABITATS & SPECIES

L8-39.
- Third paragraph discusses riparian habitat value and neglects to quantify the real loss of the regions wetlands and riparian habitat. What percent of the County's wetlands and natural riparian corridors remain?

Page 5 – 9 Water Resources, Context

L8-40.
- It is worth mentioning that the City of San Diego's MSCP lands provide the county with crucial protected habitat at seven source water reservoirs: Barrett, El Capitan, Hodges, Morena, Otay, San Vicente, and Sutherland. In addition four city owned sites are deemed Cornerstone Lands including Marron Valley, San Pasqual Valley, portions of lands surrounding Upper and Lower Otay Reservoir, and lands surrounding San Vicente.

L8-41.

Page 5 – 13 GOAL COS – 4

L8-42.
- Add a fifth goal COS – 4.5 Source Water Protection. Protecting reservoir water quality requires that the quality of the water entering the reservoirs is maintained or improved. Pollutants of high concern are nutrients and related algae, total organic carbon, and total dissolved solids

L8-43. **Page 5 – 14 Agricultural Resources CONTEXT**

- Add water quality to last paragraph regarding potential agricultural conflicts

Page 5-34 Energy and Sustainability

- Energy and water use are inextricably linked, especially in southern California. In moving water around the state the California State Water Project uses more energy than any single user. With an estimated 238,500 new homes envisioned for the County a prudent approach linking water use and energy is critical. The following text illustrates the conection.

L8-44.

"Water conservation lowers energy use and energy bills. The San Diego case study revealed that end use of water—especially energy intensive uses like washing clothes and taking showers—consumes more energy than any other part of the urban water conveyance and treatment cycle. This is a rather striking finding since conveyance is a much more obvious energy consumer, particularly in Southern California.

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L8-44. cont. Therefore, reducing water use can save significant amounts of energy. For instance, if San Diego relied on conservation instead of additional water from Northern California to provide the next 100,000 acre-feet of water, it would save enough energy to provide electricity for 25 percent of all of the households in San Diego."[1]

Page 5-39 GOAL COS – 19

L8-45. • COS – 19.1 Sustainable Development Practices. Add at end of sentence '<u>and utilize Low Impact Development practices to keep runoff contained on site.</u>'

L8-46. • COS – 19.2 Recycled Water in New Developments. <u>Recycled water should not be used when it increases salt loading in reservoirs</u>

L8-47. • Add <u>COS – 19.2 Grey water. A permit is required from the Department of Environmental Health for the gray water system. (CPC Title 24, Part 5, California Administrative Code, Appendix G.). Grey water should not be used when it increases salt loading in reservoirs</u>

L8-48. **Page 5 – 43 Polices COS – 23.1 Public Access.** Add at end of sentence <u>and protects water resources</u>

CHAPTER 10

L8-49. ADD GLOSSERY TERMS: (suggested additions and definitions)

1. **Aquifer:** A formation, group of formations, or part of a formation that contains sufficient saturated, permeable material to yield significant quantities of water to wells and springs.

L8-50. 2. **Confined aquifer:** Aquifer in which ground water is confined under pressure that is significantly greater than atmospheric pressure.

L8-51. 3. **Drinking Source Water Protection:** Protection of surface and ground waters that supply drinking waterfrom pollutants.

L8-52. 4. **Watershed:** An area of land that drains water into a lake, reservoir, or river. Everything that is on that land whether a natural feature or a human activity.

[1] Ronnie Cohen , Gary Wolff, and Barry Nelson
ENERGY DOWN THE DRAIN The Hidden Costs of California's Water Supply
Natural Resources Defense Council Pacific Institute, Oakland, California, August 2004

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L8-53. Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. The City respectfully requests that you please address the above comments in the FEIR and provide four copies of the document for distribution to the commenting department. If you have any additional questions regarding the City's review of the DEIR, please contact Myra Herrmann, Senior Planner at 619-446-5372 or via email at mherrmann@sandiego.gov.

Sincerely,

Myra L Herrmann, for

Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department

cc: Myra Herrmann, Senior Planner, Development Services
Marc Cass, Associate Planner, Development Services Department
Nicole McGinnis, Senior Planner, Public Utilities Department
Farah Mahzari, Associate Engineer - Traffic, Engineering & Capital Projects Department
Labib Qasem, P.E., Senior Traffic Engineer, Development Services Department
Review and Comment online file

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L8-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L8-2 The County agrees that the proposed project would result in significant traffic impacts to City of San Diego roadway segments and that mitigation requiring future development contribute appropriate fair share contributions is required. While the DEIR does not specifically identify mitigation measures for impacts to City of San Diego roadways, DEIR Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards, identifies General Plan Update Policy M-3.2, Traffic Impact Mitigation, which requires projects to contribute a fair share contribution toward financing transportation facilities. This policy applies to all roadways identified in Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, including seven roadway segments in the City of San Diego that would be impacted from implementation of the General Plan Update. As such, no revisions to the DEIR were made based upon this comment.

L8-3 The County agrees that in order to minimize impacts to roadway segments, development in the unincorporated County should correspond to actual improvements to roadway segments. Phasing is one way to accomplish this. DEIR Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards, identifies General Plan Update Policy M-2.1, Level of Service Criteria, which requires that all development provide associated road improvements necessary to achieve level of service (LOS) D. Additionally, this same section identifies General Plan Update Policy LU-12.2, Maintenance of Adequate Services, which requires development projects to mitigate significant impacts to existing service levels of public facilities. Therefore, the DEIR does include General Plan Update policies and mitigation measures that require transportation and traffic impacts that are phased concurrent with development.

L8-4 The County agrees with this comment and has revised DEIR Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards, under the subheading "Methodology of Adjacent Cities Traffic Assessment," to add a discussion regarding the City of San Diego's impact significance threshold. This is consistent with the approach taken to describe the two other cities (Escondido and Chula Vista) whose significance criteria differ from SANTEC/ITE Guidelines for Traffic Impact Studies. The following discussion has been added to DEIR Section 2.15.3.2 and to Section 2.2, Impact Significance Criteria, of DEIR Appendix H, Traffic Impacts to Adjacent City Jurisdictions.

"<u>The City of San Diego considers D to be the acceptable LOS for freeways, roadways and intersections, except in undeveloped locations where LOS C is considered to be acceptable. The City of San Diego uses the same thresholds identified in Table 2.15-23, SANTEC/ITE Measures of Significant Project Traffic Impacts, for projects resulting in LOS E. However, the City of San Diego applies the following thresholds for projects resulting in LOS F: 1) freeways are allowed up to a 0.005 change in V/C or 0.5 mph; 2) roadways are allowed up to a 0.01 change in V/C or 0.5 mph; 3) intersections are allowed a 1.0 second delay; and 4) ramp meters are allowed a 1.0 second delay</u>."

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The analysis of the seven City of San Diego roadway segments identified in Table 4.15-24, Significant Traffic Impacts to Adjacent Cities Resulting From the Proposed Project, has been updated using the V/C ratios identified above for the City of San Diego. However, no additional impacts have been identified from the change in the City of San Diego's significant impact criteria. Therefore, no revisions to Table 4.15-24 are necessary.

L8-5 The DEIR does not analyze unincorporated County intersections or intersections within adjacent cities because of the extremely large study area for the proposed project, which encompasses 16 incorporated jurisdictions and the entire unincorporated County. This is discussed in the DEIR under the subheading, "Methodology of Traffic and Circulation Assessment" in Section 2.15.3.1, Issue 1: Unincorporated County Traffic and LOS Standards. As stated in the DEIR, "In order to provide a program-level analysis of the project area, traffic operations were evaluated by consideration of daily roadway segment operations rather than peak hour intersection operations. The evaluation of peak-hour intersection operations would be appropriate for addressing specific transportation corridors (i.e., intersections) that may be impacted by a proposed project. This approach is not feasible for this project, due to its size." Additionally, the evaluation of intersections in the future is not included as a component of the proposed project.

L8-6 The DEIR analyzes impacts on City streets but does not analyze impacts on City intersections. Major streets located in adjacent jurisdictions that are anticipated to be impacted by implementation of the General Plan Update are analyzed in DEIR Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards. As shown in Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, seven street segments in the City of San Diego are anticipated to be impacted by the proposed project. Mitigation for impacts to adjacent city jurisdiction roadways are identified in Section, 2.15.6.2, Issue 2: Adjacent Cities Traffic and LOS Standards. Refer to response to comment L8-5 for additional information regarding why the DEIR does not analyze unincorporated County intersections or intersections within adjacent cities.

L8-7 DEIR Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards, identifies several policies and mitigation measures that promote coordination between the County and adjacent city jurisdictions for the development and financing of transportation improvements. These include General Plan Update Policy LU-4.3, Relationship of Plans in Adjoining Jurisdictions, General Plan Update Policy M-4.6, Interjurisdictional Coordination, and mitigation measure Tra-2.1.

L8-8 The County agrees with this comment. The DEIR includes multiple General Plan Update policies and mitigation measures that require private development to mitigate potential traffic impacts, including those in the City of San Diego. DEIR Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards, identifies the following General Plan Update Policies that require private development to mitigate potential traffic impacts: Policy LU-12.2, Maintenance of Adequate Services; Policy M-2.1, Level of Service Criteria; and Policy M-3.2, Traffic Impact Mitigation. In

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addition, Section 2.15.6.2, Issue 2: Adjacent Cities Traffic and LOS Standards, identifies mitigation measure Tra-2.1, which requires coordination efforts with other jurisdictions when development projects will result in a significant impact on city roads. Therefore, the DEIR does require private development to mitigate potential traffic impacts in the City of San Diego.

L8-9 The County disagrees with this comment. The level of detail requested in the comment would not be appropriate to include in this Program EIR. CEQA Guidelines Section 15146 states, "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." The DEIR is a programmatic document that evaluates land uses on a County-wide level. For this reason, it is not required or appropriate that specific project-level infrastructure improvements and funding sources be identified for traffic improvements in other jurisdictions. As such, no changes were made to the DEIR.

It should be noted that DEIR Section 2.15.3.1, Issue 1: Unincorporated County Traffic and LOS Standards, analyzes the potential roadway infrastructure needs in the unincorporated County from implementation of the proposed project. Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards, analyzes the potential roadway infrastructure needs in adjacent cities' roadways from implementation of the proposed project. Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards, identifies the following General Plan Update policies and mitigation measures that would provide funding for anticipated roadway impacts: Policy LU-12.2, Maintenance of Adequate Services; Policy M-2.1, Level of Service Criteria; Policy M-3.2, Traffic Impact Mitigation; and mitigation measures Tra-1.7 and Tra-1.8.

L8-10 The County agrees that regional coordination is required to plan for future roadways. While the DEIR does not specifically identify the need to coordinate the alignment and construction of SR-905 and SR-11 to the future border crossing, as requested in the comment, DEIR Section 2.15.6.2, Issue 2: Adjacent City Jurisdictions Traffic and LOS Standards, does identify multiple General Plan Update policies and mitigation measures that require coordination with adjacent cities to reduce traffic impacts. These include General Plan Update Policy M-4.6, Interjurisdictional Coordination, and General Plan Update Policy M-5.1, Regional Coordination. Additionally, mitigation measures Tra-1.1, Tra-1.2 and Tra-2.1 also require inter-agency coordination in an effort to improve transportation facilities. Specifically, Tra-1.1 requires coordination with SANDAG and adjacent cities during updates to the Regional Transportation Plan (RTP) to identify a transportation network that maximizes efficiency, enhances connectivity between different modes of travel, and minimizes impacts when locating new freeways and State highways. No changes to the DEIR have been made based upon this comment.

L8-11 The County agrees that regional coordination is required to plan for future roadways. While the DEIR does not specifically identify the need to coordinate the future SR-125/Lonestar Road interchange, as requested in the comment, Section 2.15.6.2, Issue 2: Adjacent City Jurisdictions Traffic and LOS Standards, does identify multiple General Plan Update policies and mitigation measures that require coordination with

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adjacent cities to reduce traffic impacts. Please refer to response to comment L8-10 for additional information.

L8-12 A search of the General Plan Update did not find any uses of the term "alleviate" in the draft General Plan. However, the word "alleviate" was replaced with "mitigate" in DEIR Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards, under the subheading "Infeasible Mitigation Measures."

L8-13 The County agrees with this comment and has made revisions to DEIR Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards, under the heading Methodology of Adjacent Cities Traffic Assessment, to add a discussion regarding the City of San Diego's impact significance threshold. Appendix H, Traffic Impacts to Adjacent City Jurisdictions, has also been updated with this information. Please refer to response to comment L8-4 for additional information.

L8-14 The County appreciates this information; however, the DEIR does not evaluate parking capacity for adjacent jurisdictions. Section 2.15.3.5, Issue 5: Parking Capacity, provides an analysis of the proposed project's impact on parking capacity within the unincorporated County.

L8-15 The County agrees that jurisdiction does not always equal infeasibility and has modified the wording under the subheading, "Infeasible Mitigation Measures," in DEIR Section 2.15.6.2, Issue 2: Adjacent Cities Traffic and LOS Standards as follows:

"~~However~~Although not always the case, mitigation measures to improve adjacent jurisdictions roadways are generally considered ~~would~~ infeasible because such improvements are outside the jurisdiction of the County. In some cases, such roadway improvements would be consistent with the plans of the affected cities. However, in many cases they have not been planned, either because the city does not desire that the road be improved or the plans have not yet been updated to reflect the level of future growth included in this analysis."

L8-16 This comment is not at variance with the existing content of the DEIR.

L8-17 The County agrees with this comment and has modified mitigation measure Tra-2.1 to use the word 'mitigate' rather than 'alleviate'.

L8-18 The County disagrees with this comment. Rather than providing a new table, as requested in the comment, a discussion of the City's significance threshold has been added to DEIR Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards, under the subheading "Methodology of Adjacent Cities Traffic Assessment." This is consistent with the approach taken to describe the other two other cities (Escondido and Chula Vista) whose significance criteria differ from SANTEC/ITE Guidelines for Traffic Impact Studies. Appendix H, Traffic Impacts to Adjacent City Jurisdictions, has also been updated with this information. Refer to response to comment L8-4 for the language that was added to the DEIR.

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L8-19 The County agrees with the comment and has changed the Capacity (LOS E) column in DEIR Table 2.15-16, Existing Conditions Roadway LOS by Jurisdiction, from 10,000 average daily traffic (ADT) to 9,000 ADT for the segment of Airway Road between Michael Faraday Drive and SR-905. However, the existing ADT along this segment of Airway Road is estimated at 6,600, which is within the range of the City's threshold for LOS C (5,500 to 7,500 ADT). Therefore, Airway Road, between Michael Faraday Drive and SR-905, operates at LOS C under Existing Conditions. The change in the LOS E capacity from 10,000 to 9,000 ADT would not result in any additional traffic impacts. Appendix H, Traffic Impacts to Adjacent City Jurisdictions, has also been updated with this information in Tables 3.1, 4.1, 4.3, 5.1, 5.3, 5.5, 6.2, 6.3, 6.4.

L8-20 The County agrees with the comment and has made corrections to DEIR Table 2.15-16, Existing Conditions Roadway LOS by Jurisdiction, to identify the segments of Siempre Viva Road as: 1) La Media Rd to SR-905, and 2) SR-905 to Enrico Fermi Drive. Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, and Table 2.15-27, Cumulative Significant Traffic Impacts, have also been corrected to identify the segment of Siempre Viva Road as SR-905 to Enrico Fermi Dr. Appendix H, Traffic Impacts to Adjacent City Jurisdictions, has also been updated with this information in Tables 3.1, 4.1, 4.3, 5.1, 5.3, 5.5, 6.2, 6.3, 6.4. These changes are the result of a typographical error and do not result in any additional traffic impacts.

L8-21 The County agrees with the comment. A footnote has been added to the end of Table 2.15-16, Existing Conditions Roadway LOS by Jurisdiction, stating that the segment of Siempre Viva Road between La Media Rd and Avenida Costa Brava/Melksee Street is not currently constructed to a 6-lane major arterial, and would have a LOS E capacity of 22,500 ADT, resulting in an acceptable LOS B along this segment. Tables 3.1, 5.1 and 5.3 in Appendix H, Traffic Impacts to Adjacent City Jurisdictions, have also been updated with this information. This revision does not meaningfully change the analysis provided in the DEIR and would not result in any additional traffic impacts.

L8-22 The County agrees with the comment and has revised the Capacity (LOS E) column in Table 2.15-16, Existing Conditions Roadway LOS by Jurisdiction, from 50,000 ADT to 40,000 ADT for the segment of Siempre Viva Road from SR-905 to Enrico Fermi Drive. The existing ADT along this segment of Airway Road is estimated at 19,400, which would result in an LOS B under Existing Conditions, instead of LOS A as previously identified. This revision has also been made to Table 2.15-16 to identify an existing LOS B for Siempre Viva Road between SR-905 and Enrico Fermi Drive. The Cross-Section column of this table has been revised from 6-lane Major Arterial to 4-lane Major Arterial. Appendix H, Traffic Impacts to Adjacent City Jurisdictions, has also been updated with these revisions. The change in the LOS E capacity from 50,000 to 40,000 ADT and the change in the existing LOS of the segment from LOS A to LOS B would not result in any additional traffic impacts.

Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, and Table 2.15-27, Cumulative Significant Traffic Impacts, have

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also been corrected to identify an existing LOS B for Siempre Viva Road between SR-905 and Enrico Fermi Drive. Appendix H, Traffic Impacts to Adjacent City Jurisdictions, has also been updated with this information in Tables 3.1, 4.1, 4.3, 5.1, 5.3, 5.5, 6.2, 6.3, 6.4. This change would not result in any additional traffic impacts.

L8-23 The County disagrees that the DEIR Appendix H does not clarify on what basis the project study area was determined. Section 1.2, Project Study Area and Scenarios, of Appendix H, Traffic Impacts to Adjacent City Jurisdictions Report, provides a description of the process that was used to identify the project study area. As stated in this section, the study area was determined from roadways identified in 12 adjacent jurisdictions' responses to the Notice of Preparation (NOP) for the DEIR of the County of San Diego General Plan Update. In addition, a number of additional roadways located in the jurisdictions of Del Mar, National City, Oceanside and San Diego were selected for analysis to ensure a comprehensive County-wide assessment. The additional roadways were compiled from the 2007 SANDAG Regional Transportation Plan, and then defined based upon location and connectivity to the roadway network within the unincorporated County. The NOP letters prepared by the 12 adjacent jurisdictions are provided in DEIR Appendix A, Notice of Preparation, Comments Received on the NOP, and Materials from the Scoping Meeting.

L8-24 The County requested recommendations from adjacent jurisdictions' for the identification of roadway segments to be included in the County of San Diego General Plan Update Traffic Impacts to Adjacent City Jurisdictions Report (Appendix H) in July 2008. The roadway facilities that were recommended by the adjacent jurisdictions became the focus of subsequent analyses. The analysis of the segments of La Media Road and Otay Mesa Road identified in the comment was not previously requested by the City of San Diego. However, the County has reviewed these segments in response to the comment. As shown in the table below, both segments would operate at an acceptable LOS under the existing condition and with implementation of the proposed General Plan Update. As a result, no additional traffic impacts have been identified. No revisions to the DEIR or Appendix H were made based on this comment.

Table L8-24: LOS for Existing Conditions and Proposed Project

Roadway	Segment	Classification	Existing		GP Update	
			ADT	LOS	ADT	LOS
La Media Rd	Northern City Boundary to Otay Mesa Road	6-Ln Prime	25,400	B	26,700	B
Otay Mesa Rd	La Media Road to Eastern City Boundary	6-Ln Prime	25,200	B	45,600	C

L8-25 The County disagrees with the comment. The base year model was based on available counts collected in 2007. Given the large study area encompassing the entire unincorporated portions of the County of San Diego, existing traffic counts were derived from previously available traffic count data and information supplied by SANDAG. The County has determined that the traffic count data used in the County of San Diego General Plan Update Traffic Impacts to Adjacent City Jurisdictions

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Report (Appendix H) is adequate for this program level traffic analysis. No revisions to the DEIR or Appendix H were made based on this comment.

L8-26 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L8-27 The DEIR provides the requested mitigation for impacted City of San Diego roadway segments in Section 2.15.6.2, Issue 2: Adjacent Cities Traffic and LOS Standards, which includes General Plan Update Policy LU-4.3, Relationship of Plans in Adjoining Jurisdictions; Policy M-4.6, Interjurisdictional Coordination; and all policies identified in Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards. In addition, Section 2.15.6.2 identifies the following mitigation measures to reduce traffic-related impacts to adjacent jurisdictions' facilities: Tra-2.1, Tra-1.1, Tra-1.2, Tra-1.3, Tra-1.4, Tra-1.7, and Tra-1.8. Therefore, the DEIR identifies mitigation measures for impacted City of San Diego roadway segments and no additional revisions were made to the DEIR in response to this comment.

It should be noted that the proposed General Plan Update policies and mitigation measures, in addition to compliance with applicable regulations, would reduce proposed project impacts related to adjacent cities traffic and LOS standards; however, not to below a level of significance. Therefore, direct and cumulative project impacts would be significant and unavoidable.

L8-28 The County agrees with the comment and has analyzed the five roadways requested in the comment. As shown in Table L8-28 below, with the exception of impacts to Siempre Viva Road segments (as previously identified in DEIR Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project), all of the analyzed roadways and State highways would operate at an acceptable LOS with implementation of the General Plan Update. Therefore, no additional significant impacts have been identified and no revisions were made to the DEIR in response to this comment.

Table L8-28: LOS for Existing Conditions and Proposed Project

Roadway	Segment	Base Year 2007 ADT	Classification	Existing		GP Update	
				ADT	LOS	ADT	LOS
La Media Rd	Northern City Boundary to Otay Mesa Road	1,000	6-Ln Prime	25,400	B	26,700	B
Otay Mesa Rd	La Media Road to Eastern City Boundary	55,700*	6-Ln Prime	25,200	B	45,600	C
SR-125	Northern City Boundary to SR-905	0	6-Ln State Highway	45,500	A	53,900	A
Siempre Viva Rd	La Media Road to SR-905	10,900	6-Ln Prime	18,000	A	19,500	A
	SR-905 to Enrico Fermi Dr	19,400	6-Ln Prime	50,700	**F**	59,300	**F**
I-905/SR-11	La Media Road to Eastern City Boundary	0*	6-Ln State Highway	129,000	C	140,000	C

Note: * Otay Mesa Road is also SR-905 currently. However, under future conditions they were assumed to be separate facilities.

L8-29 The County disagrees with this comment. The SANDAG Series 10 Base Year 2007 traffic model, specially built for the County of San Diego General Plan Update, was used to determine traffic impacts to adjacent city jurisdictions. Therefore, the

Responses to Letter L 8, City of San Diego (cont.)

appropriate traffic model for the proposed project was used in the DEIR. Further, while the funding and timing of La Media Road improvements are not available today, they may well be available by 2030, similar to many other proposed traffic improvements. In addition, the General Plan Update traffic model is based on full build-out of both the land use map and road network; therefore, analysis of an incomplete road network would not be appropriate. The evaluation of a scenario without the La Media Road connection would be appropriate for addressing impacts by a specific development project. No changes were made to the DEIR in response to this comment.

L8-30 The County does not agree with the suggestion to change all instances of "lakes" to "reservoirs." This comment does not address a significant environmental issue and no changes were made to the General Plan Update documents.

L8-31 The Land Use Framework section of the General Plan Update Land Use Element has been amended with the addition of "public utilities lands" as lands that are outside the jurisdiction of the County, as recommended.

L8-32 The comment pertains to draft General Plan Policy LU-8.2, Groundwater Resources. The County does not agree that a discussion of water rights is appropriate within this policy or within the draft Land Use Element. In addition, this issue was not identified as an environmental issue pursuant to CEQA, and therefore, was not evaluated within the DEIR. During the review of development project applications, the County will respect groundwater rights of any person or jurisdiction.

L8-33 The County disagrees with adding a policy to restrict development in prime recharge locations. With the advent of County Low Impact Development (LID) regulations in 2008, new development is required to follow LID principles and techniques in its design. LID attempts to reduce the amount of runoff by mimicking the natural hydrologic function of the site. LID focuses on minimizing impervious surfaces and promoting infiltration and evaporation of runoff before it can leave the location of origination. Using small, economical landscape features, LID techniques work as a system to filter, slow, evaporate, and infiltrate surface runoff at the source. In addition, most projects located within the groundwater dependent areas of the County are rural on large lots without stormwater systems. These types of development typically do not significantly decrease the amount of recharge to the groundwater system since the water is not being diverted artificially outside the system via a stormwater conveyance system.

L8-34 The County appreciates the comment and has added the following text to the Water Supply section of the General Plan Update Land Use Element:

"<u>The City of San Diego owns and maintains seven drinking source water reservoirs in the County. While these reservoirs do not provide potable water for residents outside the city, they are used by County residents for recreation and provide valuable habitat."</u>

Responses to Letter L 8, City of San Diego (cont.)

L8-35 The title of Goal LU-13 of the General Plan Update Land Use Element has been amended with the addition of "and protection" as recommended.

L8-36 This comment and comment L8-42 recommend the same policy be added to both the draft General Plan Update Land Use and Conservation and Open Space Elements. The County does not concur that duplicate policies need to be included in separate elements; however, Policy COS-5.5, Impacts of Development, has been amended as discussed in the response to comment L8-42 below.

L8-37 The "Road Network" subsection of the draft General Plan Update Mobility Element has been amended with the addition of the following text at the end of the section as recommended:

"Road design should also consider environmental impacts and minimize runoff pollutants entering County watersheds."

L8-38 The "Purpose and Scope" subsection of the draft General Plan Conservation and Open Space Element has been amended with the addition of "and groundwater aquifer" in the "Water Resources" bullet.

L8-39 The County does not agree that it is necessary to quantify the percentage of the County's remaining wetlands and natural riparian corridors. The format for the General Plan Update's Regional Elements is to include an analysis of existing conditions in separate Background Reports.

L8-40 The Water Resources Context section of the draft General Plan Conservation and Open Space Element has been amended with the additional the text as identified below.

"The City of San Diego has seven water reservoirs in the unincorporated County that are crucial to protecting habitat. These reservoirs include Barrett, El Capitan, Hodges, Morena, Otay, San Vicente, and Sutherland."

L8-41 The County does not concur that it is necessary to revise the draft General Plan Conservation and Open Space Element Water Resources section to incorporate "Cornerstone Lands" owned by the City of San Diego. This information is more appropriately included in the Background Report.

L8-42 Draft General Plan Policy COS-5.5, Impacts of Development, has been amended to add background information based on the recommendations of this comment. The added text is as follows:

"Protecting reservoir water quality requires that the quality of the water entering the reservoirs is maintained or improved. Pollutants of high concern are nutrients and related algae, total organic carbon, and total dissolved solids."

Responses to Letter L 8, City of San Diego (cont.)

L8-43 The Agricultural Resources Context section of the General Plan Update Conservation and Open Space Element has been amended to include "water quality issues" as a potential agricultural conflict, as recommended.

L8-44 The County appreciates the comment and has amended the Energy and Sustainable Development section of the General Plan Update Conservation and Open Space Element with the following text:

"Energy and water are inextricably linked, especially in Southern California, where moving imported water around the State requires large amounts of energy. For example, the California State Water Project uses more energy than any single user. Therefore, reducing water use can save significant amounts of energy."

L8-45 The County appreciates the comment, but does not find it necessary to revise draft General Plan Policy COS-19.1, Sustainable Development Practices, with the provision to use LID practices. Draft Land Use Element Policy LU-6.5, Sustainable Stormwater Management, already requires development to incorporate LID techniques.

L8-46 Draft Conservation and Open Space Element Policy COS-19.2, Recycled Water in New Development, has been amended with the following text, as recommended:

"Restrict the use of recycled water when it increases salt loading in reservoirs."

L8-47 Draft Conservation and Open Space Element Policy COS-19.2 has been amended with the following background information, as recommended:

"A permit is required from the County Department of Environmental Health for the use of recycled water."

L8-48 General Plan Update Policy COS-23.1 has been amended to add the phrase "and protects water resources" to the end of the policy as recommended.

L8-49 The Glossary section of the draft General Plan has been amended with the addition of the term "aquifer," as recommended. Amended text is provided below:

"Aquifer – A formation, group of formations, or part of a formation that contains sufficient saturated, permeable material to yield significant quantities of water to wells and springs."

L8-50 The County appreciates the comment, but does not find it necessary to add the term "confined aquifer" to the Glossary section of the draft General Plan, as this term is not used within these documents.

L8-51 The County appreciates the comment, but does not find it necessary to add the term "drinking source water protection" to the Glossary section of the draft General Plan.

Responses to Letter L 8, City of San Diego (cont.)

L8-52 The General Plan Update Glossary section of the Regional Elements has been amended with the addition of the term "watershed," as recommended. Amended text is provided below:

"Watershed – An area of land that drains water into a lake, reservoir, or river. Everything that is on that land, whether a natural feature or human activity, is included."

L8-53 This comment provides contact information for any questions raised when responding to the comments and does not raise an environmental issue for which a response is required.

Comment Letter L 9, City of San Marcos

Development Services
1 Civic Center Drive
San Marcos, CA 92069-2918

Tel: 760.744.1050
Fax: 760.591.4135
Web: www.San-Marcos.net

August 31, 2009

Mr. Devon Muto
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: County of San Diego Comprehensive General Plan Update and Draft EIR Response
LOG No. 02-ZA-001; SCH NO. 2002111067

L9-1. Thank you for giving the City of San Marcos an opportunity to respond to the County of San Diego Comprehensive General Plan Update Draft EIR (DEIR). The City of San Marcos has the following General Plan Update and DEIR comments:

Aesthetics:

L9-2.
- On February 14, 2006, the San Marcos City Council adopted a Ridgeline Protection and Management Zone within the City limits that became effective on March 16, 2006. During the process of zone establishment, a Ridgeline Task Force considered four study areas (exhibit attached) within the both the City limits and City Sphere of Influence. Page 2.1-5 of the Aesthetics section of the DEIR references San Marcos Mountains, but does not include other ridgeline study areas identified in the Sphere of Influence (SOI) by the City such as: Merriam Mountains north of the City, a primary ridgeline extending from east to west near the abandoned San Marcos landfill in the south of the City, and a County area to the east of San Elijo Hills (Frank's Peak and Mt. Whitney). Please include review and analysis of these areas in the Aesthetics section of the DEIR since these are locally and regionally significant

L9-3.
- The City of San Marcos requests that the General Plan include in addition to Policy M-2.3, a policy that specifically includes uses of design measures, including landscape, to soften roadways that are proposed for widening in rural areas such as Deer Springs Road from the San Marcos City limits to the I-15.

Biology:

L9-4.
- The City requests a consultation to insure consistency between the MHCP Focused Planning Area and linkages identified in the City of San Marcos Subarea Plan and the County MSCP Core Resource Area identified in the DEIR.

L9-5.
- The City has identified two County Resource Areas inconsistent with the City of San Marcos Subarea Plan.
    - The SM1 area identified on Figure 2.9-5 identified in the Adopted and Draft MSCP Core and Linkage Area Figure 2.4-2 as a Core Resources Area in the

Comment Letter L 9, City of San Marcos (cont.)

L9-5. cont. Draft North County MSCP Core and Linkages Areas (Figure 2.3-4) is identified with a 50% vegetation impact. The City has mapped a portion of this area in the City's Subarea Plan in the North Focused Planning Area. Since Figure 2.3-4 does not specify which 50% of the area would be impacted, the City is unable to verify consistency. Please provide confirmation that the 50% impact is consistent with the City Subarea Plan.

L9-6. ○ The City Subarea Plan Focused Planning Area Subareas Figure 4 identifies property within the southeast corner of our City as 60% preserve adjacent to an area of the County identified as 100% impacted on Figure 2.4-2 of the DEIR, the Estimated Vegetation Impact Adopted and Draft MSCP Core and Linkage Area.

Land Use:

L9-7. • The County I-55 Policy states that annexation of developed or developing areas which are and adjacent to cities is generally encouraged when appropriate factors are applicable. The City requests that policies be incorporated into the General Plan that reiterates the approach that the County continues to support annexation of County unincorporated areas within City sphere areas when the appropriate factors listed in the I-55 policy area applicable.

L9-8. • SOI City Land Use: Table 2.9-47 includes City designated land uses that are not listed correctly. Please refer to the City of San Marcos General Plan map (attached) for correct designations.

L9-9. • Land Use Compatibility: The SM1 area identified on Figure 2.9-5 is proposed for modification from 1 dwelling per acre to SR-10 (1 du/10 and 20 acre). The area however is surrounded by SR-1, VR-2, SR-0.5, and one acre minimum in the City of San Marcos. The change to a SR-10 would create a 10 acre minimum within the Las Posas Road corridor that is surrounded by a one/two acre minimum area located adjacent to the City of San Marcos, creating an incompatible density in this area. Further, the approved San Marcos Highland Specific Plan includes SM1 with a one acre minimum density in the San Marcos General Plan.

L9-10.

L9-11. • SM 6/SM 7: The City of San Marcos General Plan designates these areas as 4-8 du/acre and 15-20 du/acre. The County General Plan update to change these areas to a 24 du/acre designation is not consistent with the City of San Marcos General Plan and the existing single family development in this area.

L9-12. • SM 11: The City of San Marcos had acquired a portion of SM 11 for open space mitigation for the Rancho Santa Fe Road alignment. The City requests the open space mitigation parcel be designated as open space within the County of General Plan. The City will include this change in the City of San Marcos General Plan update.

L9-13. • SM 13/SM 14: The City of San Marcos has designated both of these areas as Light Industrial both parcels are adjacent to existing industrial type uses (SM 13 is adjacent to the Escondido Meyers Industrial Park area and SM 14 is adjacent to the closed San Marcos Landfill site approved as part of a Film Studio Specific Plan Area and includes proximity to the La Costa Meadows Industrial Park in the City of San Marcos). Residential land uses designations in these areas is incompatible with adjacent uses especially as project proponents have discussed with City staff development of light industrial, not residential uses, on these properties and future City annexation.

Public Services/Fire Protection:

Comment Letter L 9, City of San Marcos (cont.)

L9-14. • The subject site is located within the San Marcos Fire Protection District (SMFPD). The DEIR states that there will be a need for additional fire protection services to serve new development as increasing population and housing in areas that are not currently able to meet travel time goals would result in the need for new or expanded fire facilities to be constructed so that acceptable travel times can be met (Page 2.13-18) and that cumulative project impacts would result in a need for additional fire protection services to serve new development (Page 2.13-25). The City appreciates inclusion of the following policy:

  - Policy S-6.3: Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

L9-15. • The City does, however, ask that the DEIR provide more specific mitigation measures as to how funding will be accomplished, including that projects within the San Marcos Fire Protection District annex into the City of San Marcos Fire Protection District Community Facilities District 2001-01 to provide a funding source for the provision of fire services.

Recreation/Trails:

Trails section of Mobility Element:

L9-16. • There is no Twin Oaks Community Trail Plan in the document. This leaves trails within the City of San Marcos disconnected from other jurisdictions with no northern regional connections to Vista, Bonsall, Fallbrook, Valley Center, Hidden Meadows, Escondido and northern Twin Oaks Valley.

Recreation Element 2.14:

L9-17. • The County General Plan Update calls for 10 acres per 1,000 population for local parks in addition to 15 acres per 1,000 population of Regional Parks. They currently have only yields 2 acres /1,000 of local parks. As such, additional park lands need to be provided as future development occurs.

L9-18. • There are no existing local or regional parks in the Twin Oaks Community. The County needs to plan local parks in this area, or there should be a contribution towards parks in San Marcos for County residents to use.

L9-19. • Overall, increases in County population adjacent to San Marcos would result in increased use of San Marcos recreational facilities from County project residents, and the potential to result in the deterioration of San Marcos facilities.

L9-20. • The County General Plan Update therefore could have a direct and cumulative impact on recreational facilities in San Marcos not mitigated for in the DEIR. The County has the potential to collect fees for recreational development from County projects and apply this money to develop facilities in other areas, leaving San Marcos to provide for this impact.

L9-21. Therefore, the City requests that projects pay a fair share contribution for park improvements for projects which have a direct and cumulative impact to parks within the City of San Marcos.

L9-22. • The wording on Page 2.14-10 refers to a quarter mile wide "general alignment" corridor for the general location of future trails. This wording has lead to confusion in the past, and has allowed City of San Marcos Sphere of Influence area residents to argue against having any trails, given the perceived dedication requirement potentially resulting in a quarter mile wide trail easement.

Comment Letter L 9, City of San Marcos (cont.)

L9-23. • Page 2.14-11 and Figure 2.14-2 does not include the Inland Rail-Trail, which should be added as a regional trail.

L9-24. • The proposed County General Plan Update does not specifically site or plan recreational facilities (page 2.14-19). There should be a Master Park Plan required that shows how the County will mitigate the lack of new recreational facilities.

Traffic/Mobility:

L9-25. • Appendix 'E' Page E-2: Deer Springs Road has been identified to be six lanes from I-15 to Buena Creek Road. The limits identified cross over to San Marcos Jurisdiction by about 1700 feet. Deer Springs Road in San Marcos as well as Twin Oaks Valley Road from Deer Springs Road to Buena Creek is identified as a four lane Rural Major Arterial on the City of San Marcos Circulation Element. Said roadway would have a capacity of 35000 ADT at LOS 'D' which appears to be adequate to handle the 2030 volumes without having to upgrade to six (6) travel lanes. The City is currently in the process of updating its General Plan. The update will include an examination of the adequacy of the roadway system to include consideration of Twin Oaks Valley Road and Deer Springs Road to determine a recommendation for the appropriate designation of each roadway.

L9-26.

L9-27. • Appendix 'H' page 24: Forecast volumes are substantially different from recent studies conducted for City projects. Furthermore the roadway designations for Twin Oaks Valley Road (TOVR), La Cienega and Mulberry are incorrect. TOVR is a divided four lane arterial and La Cienega and Mulberry are Collectors.

L9-28.

L9-29. • Appendix 'H' Page 32: Forecast volumes are substantially different from recent studies conducted for City of San Marcos projects. Therefore, the LOS would most likely be different. Furthermore the roadway designations for Twin Oaks Valley Road (TOVR), La Cienega and Mulberry are incorrect. TOVR is a divided four lane arterial and La Cienega and Mulberry are Collectors.

L9-30.

L9-31. • Appendix 'H' Page 52: Same comments as in previous bullet.

L9-32. • The forecast ADT's and the LOS for City roadways are substantially different in comparison with recent studies done by the City and even the County. It is recommended that SANDAG Series 11 Combined North County Model should be utilized or attempt to reconcile discrepancies with the North County Model.

L9-33. • The project's impacts on the City streets and key intersections (which are missing from the report) should be analyzed where impacts are anticipated. Please provide an explanation on how certain streets have been chosen for analysis.

L9-34.

L9-35. • Provide a discussion relative to the County's role in mitigating the project's significant impacts on the City streets and intersections. County should consider requiring Transportation Demand Management (TDM) from projects as a partial or full mitigation of the project impacts on the vicinity roadways and intersections.

L9-36.

L9-37. • The County and the City should work together to improve traffic flow across the jurisdictional boundaries by interconnecting signals on arterial and other major streets.

L9-38. • Portions of SR-78 within the City limits currently function at LOS F. New County projects will worsen the delays. The County should mitigate its impacts on SR-78 by contributing towards a corridor study for the stretch of the highway within the North County cities as well as participating in the implementation of the recommended improvements. In addition, the County should implement an in-lieu payment fee structure for future development that shall be specifically set aside for SR-78 improvements. The City has been collecting a SR-

Comment Letter L 9, City of San Marcos (cont.)

L9-39. 78 interchange impact fee since 1990 which has resulted in three new/upgraded interchanges and several auxiliary lanes. The City is committed to participating in the corridor study and

L9-40. coordinate with SANDAG and Caltrans to determine a supplementary traffic impact fee that will pay for SR-78 capacity upgrades.

Hydrology/Water Quality:

L9-41. • It is not clear if the change in the land uses per the General Plan update would result in an increase in the surface runoffs into San Marcos Creek. If the runoffs are increased due to the proposed changes then mitigation measures such as a financial contribution to improve downstream facilities should be considered.

L9-42. • Potential Land Use changes that could result in increased runoff and corresponding sediment loading downstream should have corresponding mitigation policies that include the current and future San Diego County Municipal Stormwater Permit hydromodification development requirements to retain and infiltrate increased development runoff onsite.

L9-43. • Table 2.8.1 (Page 2.8-76) Water Bodies currently identified as impaired under the State Water Resources Control Board (SWRCB) 303(d) listing (attached) are not included. In particular, Agua Hedionda Creek, Lake San Marcos and San Marcos Creek are not listed under the Carlsbad Watershed Management Area. In addition, the SWRCB will be

L9-44. updating this list within the month and this updated information should be reflected in Table 2.81. Table 2.81 and corresponding policies to reduce pollutant loading to these 3039d0

L9-45. listed water bodies should be coordinated through the respective County Watershed Planners. Mitigation measures (starting at Section 2.8.6.1, page 2.8-62) should identify

L9-46. policies and/or pollutant management plans, education, or Best Management Practices to reduce potential increased pollutant loads to 303(d) listed water bodies.

L9-47. • Under the Local Regulatory Framework section (page 2.8-28), the discussion should make reference to compliance with the Municipal Separate Storm Sewer Systems Permit (MS-4, Order No. R9-2007-0001).

L9-48. The City requests a meeting with the County General Plan Update staff to review this letter, including your traffic analysis, land use, MSCP, recreation/trails and Storm Water Management team members. Thank you in advance for your consideration of this request. Please contact Susan Vandrew Rodriguez at 760-744-1050, ext. 3237 to schedule the requested meeting with City Engineering and Planning staff.

Sincerely,

Jerry Backoff
Planning Division Director

Enclosures (3): City of San Marcos General Plan Map
San Marcos Ridgeline Overlay Zone (ROZ) Study Areas Exhibit
Water Resources Control Board (SWRCB) 303(d) listing

cc: Paul Malone, City Manager

Comment Letter L 9, City of San Marcos (cont.)

Lydia Romero, Deputy City Manager
Charlie Schaffer, Development Services Director
Michael Edwards, City Engineer
Sassan Haghgoo, Deputy City Engineer
Todd Newman, Fire Chief
Mathew Ernau, Fire Marshall
Craig Sargent-Beach – Community Services Director
Erica Ryan – Stormwater Manager
Susan Vandrew Rodriguez, Associate Planner

Responses to Letter L 9, City of San Marcos

L9-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L9-2 This comment states that Section 2.1, Aesthetics, of the DEIR does not include an analysis of impacts to the following ridgelines: Merriam Mountains north of the City of San Marcos; a ridgeline extending from east to west in the southern portion of San Marcos; and an area of the unincorporated County east of San Elijo Hills that includes Frank's Peak and Mt. Whitney. The commenter requests that these ridgelines be included in the Aesthetics impact analysis. While the DEIR does not specifically address these ridgelines in the City of San Marcos and its sphere of influence (SOI), Section 2.1 does include the analysis of the General Plan Update's impact on scenic ridgelines in general and proposes mitigation measures to protect ridgelines. As stated under the Natural Landforms heading in Section 2.1.1.2 of the DEIR, Scenic Vistas and Visual Resources, hillsides and ridgelines are considered a scenic natural landform in the County. The analysis of scenic vistas provided in Section 2.1.3.1, Issue 1: Scenic Vistas, applies to every scenic vista in the County because the proposed General Plan Update applies to the entire unincorporated area, including scenic ridgelines. The analysis in Section 2.1.3.1 concludes that the land use designations proposed in the General Plan Update would have the potential to result in new development that could obstruct, interrupt, or detract from a scenic vista, including a scenic ridgeline. Therefore, impacts to ridgelines, including those located in the City of San Marcos and its SOI, are addressed in the DEIR.

Additionally, several of the General Plan Update policies and mitigation measures proposed in Section 2.1.6.1, Issue 1: Scenic Vistas, specifically protect ridgelines. General Plan Update Policy COS-11.1, Protection of Scenic Resources, requires the protection of natural features, including prominent ridgelines. General Plan Update Policies COS-12.1, Hillside and Ridgeline Development Density, and COS-12.2, Development Location on Ridgelines, protect ridgelines by maintaining lower-density semi-rural or rural designations in areas with steep slopes and requiring that new development be located below and away from prominent ridgelines so that structures are not silhouetted against the sky, in order to maintain scenic views of slopes and ridgelines. Mitigation measure Aes-1.8 requires that the County continue to develop and implement programs and regulations that minimize landform alteration and preserve ridgelines. Therefore, the General Plan Update policies and mitigation measures identified in the DEIR would reduce impacts to ridgelines to below a significant level, including impacts to Merriam Mountains, the ridgeline extending from east to west in south San Marcos, and the area of the unincorporated County that includes Frank's Peak and Mt. Whitney.

L9-3 The County appreciates the comment, but disagrees that a new policy should be added to the General Plan Update draft Mobility Element that specifically requires the use of design measures, including landscape, to soften roadways that are proposed for widening in rural areas. Policies M-4.3 Rural Roads Compatible with Rural Character and M-4.5 Context Sensitive Road Design provide overarching principles the commenter is requesting. These policies are implemented by the County Public Road Standards and Right-of-Way Design Guidelines. The requested

Responses to Letter L 9, City of San Marcos (cont.)

design measures should be included in these implementing tools, rather than the General Plan policies.

L9-4 The County appreciates the comment and continues to coordinate with San Marcos staff regarding the consistency analysis between the Multiple Habitat Conservation Program (MHCP) Focused Planning Area and linkages identified in the draft City of San Marcos Subarea Plan and the County draft North MSCP Core Resource Areas identified in the DEIR.

L9-5 The County agrees that the draft North County Multiple Species Conservation Program (MSCP) and General Plan Update should be reviewed for consistency with the draft City of San Marcos MHCP Subarea Plan. County staff is coordinating with City of San Marcos on this issue. It should be noted that no Figure 2.3-4 is provided in the DEIR. It is assumed that the commenter is referring to Figure 2.4-3, which is the Estimated Vegetation Impact figure for the General Plan Update. The SOI labeled as SM1 on Figure 2.9-5 may be at least partially proposed as a Core Resources Area in the future North County MSCP. It is also proposed as Semi-Rural Residential 10 under the General Plan Update project, which is estimated to result in impacts of up to 50 percent of the vegetation prior to mitigation. Since this analysis was conducted at a programmatic level, the County does not know specifically where impacts may occur within that study area. The County welcomes additional information from the City of San Marcos regarding biological constraints or MHCP planning within this SOI.

L9-6 The County appreciates this comment and agrees that both the General Plan Update and North County MSCP plans need to be reviewed for compatibility with the draft City of San Marcos MHCP Subarea Plan. Other factors that will need to be considered include the extent of existing development within the area in question and the potential for sensitive resources. County staff is requesting more information from the commenter to address the issue.

L9-7 This comment requests the County incorporate a policy into the General Plan Update that supports annexation of County unincorporated areas within City sphere areas when the appropriate factors apply. This comment appears to be referring to Policy 5 within the current North County Metropolitan Subregional Plan. This policy supports city annexation incentive programs for SOI areas. Under the General Plan Update, this policy would remain as written within the Subregional Plan (see draft Plan at: http://www.sdcounty.ca.gov/dplu/gpupdate/docs/draftgp/complan/northcountymetro_070109.pdf). As such, the County finds that additional changes to the proposed General Plan text would not be necessary.

L9-8 This comment states that City of San Marcos land uses are not listed correctly in Table 2.9-47. This table does not exist in the DEIR. It is assumed that the commenter is referring to Table 2.9-6, Proposed Sphere of Influence (SOI) Land Use Differences, which lists multiple cities' and General Plan Update land use designations for SOI areas. The City of San Marcos provided an excerpt from its General Plan to verify the land use designations in this table. Based on this

Responses to Letter L 9, City of San Marcos (cont.)

comment, the following revisions have been made to Table 2.9-6, Proposed Sphere of Influence (SOI) Land Use Differences.

Table 2.9-6. Proposed Sphere of Influence (SOI) Land Use Differences – San Marcos

City	CPA/Subregion within SOI	Area Name[1]	City Designation	General Plan Update Designation
San Marcos	North County Metro	SM1	1 du/~~8~~ 1-2ac	1 du/10 ac to 1 du/20 ac
		SM2	0.125-1 du/~~8~~ac	1 du/1,2,4 ac
		SM3,4	0.125-1 du/~~8~~ac	2.9 du/ac
		SM5	4-8 du/ac and 12-15 du/ac	10.9 du/ac
		SM6	~~12-15 du/ac~~ 4-8 du/ac, 15-20 du/ac	~~24~~7.3 du/ac
		SM7	4-8 du/ac, 15-20 du/ac	24 du/ac
		SM8	0.125-1 du/ac, 4-6 du/ac ~~1 du/8 ac~~	1 du/1,2,4 ac
		SM9	0.125-1 du/ac ~~1 du/8 ac~~	1 du/1,2,4 ac
		SM10	0.125-1 du/ac ~~1 du/8 ac~~	7.3 du/ac
		SM11	0.125-1 du/ac ~~1 du/8 ac~~	2 du/ac
		SM12	4-8 ~~1~~ du/~~8~~ ac	4.3 du/ac
		SM13	Light Industrial	1 du/1,2,4 ac
	San Dieguito	SM14	Light Industrial	1 du/1,2,4 ac

L9-9 This comment states that the Semi-Rural (SR) 10 (one dwelling unit per ten acres) designation identified on the General Plan Update land use map for the SM1 area in the City of San Marcos SOI would be incompatible with the adjacent densities in the City of San Marcos. Based on subsequent discussions with City staff, as well as review the specific plan being processed by the City of San Marcos, the County disagrees that the density should be increased in this area on the General Plan Update land use map. This area is part of a larger area of one dwelling unit per ten acres, located in a highly sensitive biological area. In addition, the one dwelling unit per ten-acre density would provide a buffer between the unincorporated County of San Diego and the higher density development in the City of San Marcos. The Community Development Model established by Guiding Principle Two in the draft General Plan (refer to Chapter 2, Vision and Guiding Principles) was applied during the land use mapping of this area, showing higher density Village and Semi-Rural Development, surrounded by lower density designations.

The application of SR-10 in this area also meets the intent of Policy LU-10.3, Village Boundaries, which is to apply Semi Rural and Rural Lands designations to define the boundaries of Villages and Rural Lands designations to serve as buffers between communities. The lower density establishes set boundaries between San Marcos and the unincorporated community of Twin Oaks, while recognizing the sensitive environmental resources.

L9-10 This comment states that the San Marcos Highland Plan, part of the City's General Plan, designates the SM1 area in DEIR Figure 2.9-5, City of San Marcos Sphere of Influence, as a one-acre minimum density area. Refer to response to comment L9-9

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for a discussion of the Land Use Designation on SM1. In an April 2, 2002 letter to the City of San Marcos, the County provided notification that San Marcos Highlands "project is in conflict with the existing County General Plan and would interfere with the outcome of the General Plan 2020 process threatening the integrity of the unincorporated territory".

L9-11 This comment states that the General Plan Update land use designation of Village Residential (VR)-24 (24 dwelling units per acre) for SOI areas SM6 and SM7 on DEIR Figure 2.9-5, City of San Marcos Sphere of Influence, are not consistent with the City of San Marcos' General Plan land use designation of 4-8 dwelling units/acre and 15-20 dwelling units/acre for these areas. The actual land use designation on the proposed project for SM6 is 7.3 dwelling units per acre, which is consistent with the existing single family development pattern and the San Marcos designation. The table has been updated. Furthermore, SM7 does have a designation of VR-24 on the Proposed Project, however is designated VR-7.3 on the remaining alternatives. The comment is noted for SM7 and will become part of the Final EIR, which will be available to the Board of Supervisors who will ultimately determine which land use map to adopt.

L9-12 This comment requests that a parcel within the SM11 area on DEIR Figure 2.9-5, City of San Marcos Sphere of Influence, be redesignated as open space because the City has acquired this parcel for open space mitigation. Based on this new information, the County will revise the property (assessors parcel number 222-042-14-00) designation to Open Space (Conservation) designation.

L9-13 This comment states that the General Plan Update residential land use designation for areas SM13 and SM14 on Figure 2.9-5, City of San Marcos Sphere of Influence, of the DEIR is incompatible with the City of San Marcos' land use designation of Light Industrial, as well as with existing land uses. The General Plan Update land use designation for these areas is SR-1 (1 dwelling unit/1,2,4 acres). The City states that these areas are adjacent to the Escondido Meyers Industrial Park and a closed landfill site. While these non-residential facilities may be in close proximity to the SOI areas, the areas surrounding SM13 and SM14 also include large areas of single-family residential uses, which are consistent with the General Plan Update SR-1 land use designation.

L9-14 This comment expresses the opinion of the City of San Marcos that they are pleased to see General Plan Update Policy S-6.3, Funding Fire Protection Services. The County of San Diego appreciates the City's feedback on this policy. This comment does not raise a significant environmental issue for which a response is required.

L9-15 This comment requests the DEIR provide specific mitigation that identifies how fire protection district funding will be accomplished. Specifically, the City would like a mitigation measure that requires projects within the San Marcos Fire Protection District to annex into the City of San Marcos Fire Protection District Community Facilities District 2001-01. The County appreciates this suggestion but believes that existing General Plan Update Policy S-6.3, Funding Fire Protection Services, addresses the issue of fire protection district funding at an appropriate level of

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specificity for the proposed project. CEQA Guidelines Section 15146 states "the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." The DEIR is a programmatic document that evaluates land uses on a County-wide level. For this reason, it is not required or appropriate that the DEIR include mitigation measures that specifically outline a program identifying how fire funding will be accomplished for each individual fire district in the County, including the San Marcos Fire Protection District. However, the following mitigation measure has been added under Section 2.13.6.1 Issue 1: Fire Protection Services requiring large development projects fund their fair share, along with considering the establishment or an impact fee or Community Facilities District:

"Pub-1.9 Implement procedures to ensure new development projects fund their fair share toward fire services facilities including the development of a long-term financing mechanism, such as an impact fee program or community facilities development, as appropriate. Large development projects are required to provide their fair share contribution to fire services either by providing additional funds and/or development of infrastructure."

L9-16 This comment suggests that the City of San Marcos would like the Twin Oaks Community Trail Plan included in the Bicycle, Pedestrian, and Trail Facilities section of the General Plan Update Mobility Element; however, community level trail plans are retained in the Community Trails Master Plan of the County Trails Program. The County General Plan is the overarching document for the program, but the more specific individual community trails and pathways plans are found in the Community Trails Master Plan. The Twin Oaks Community Trails and Pathways Plan was approved by the Board of Supervisors on September 16, 2009 and incorporated into the Community Trails Master Plan.

L9-17 This comment states that the County needs to provide additional park lands when future development occurs in order to meet the General Plan Update goal of 10 acres per 1,000 persons for local parks and 15 acres per 1,000 persons for regional parks. The County agrees with the City's comment and has provided within the DEIR an analysis of recreational impacts that the proposed project would have on the unincorporated County. The DEIR identifies potentially significant impacts to recreational facilities with implementation of the proposed General Plan Update. Specifically, Section 2.14.6.1, Mitigation for Issue 1: Deterioration of Parks and Recreational Facilities, identifies General Plan Update policies that would mitigate potential direct and cumulative project impacts to below a level of significance. The following General Plan Update policies require that additional park land be provided as development occurs: Policy LU-12.1, Concurrency of Infrastructure and Services with Development; Policy LU-12.2, Maintenance of Adequate Services; Policy M-12.4, Land Dedication for Trails; and Policy COS-24.1, Park and Recreation Contributions. The following mitigation measures would reduce impacts associated with the deterioration of parks and recreational facilities by identifying new recreational priorities and promoting land acquisition for recreational facilities: Rec-1.1, Rec-1.2, Rec-1.5, Rec-1.6, and Rec-1.7. Refer to Section 2.14.6.1 of the DEIR to review these mitigation measures.

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L9-18 This comment notes that there are no existing local or regional parks in the Twin Oaks area and, therefore, the County should either plan for parks in this area or require a contribution towards parks in the City of San Marcos for County residents to use. Section 2.14.3.2, Issue 2: Construction of New Recreational Facilities, under the heading Summary, states that the General Plan Update does not specifically plan or site new recreational facilities. However, land uses under the General Plan Update would allow for the development of future recreational facilities. The DEIR is a programmatic document that addresses land uses on a County-wide level. The appropriate level of specificity required for the DEIR (refer to response to comment L9-15) does not necessitate the identification of specific recreational facilities for each individual area within the unincorporated County, including the Twin Oaks area. However, the DEIR does identify General Plan Update policies and mitigation measures that would assist inter-jurisdictional recreational planning efforts for areas where County users may utilize non-County recreational facilities. Specifically, General Plan Update Policy COS-23.2, Regional Coordination, and mitigation measure Rec-1.2 require inter-jurisdictional coordination to prioritize recreational needs.

L9-19 This comment contends that new development in the unincorporated county will result in increased use of San Marcos recreational facilities; however, the General Plan Update will actually decrease the potential future population in the unincorporated community of Twin Oaks (located adjacent to the City of San Marcos to the north), as compared to the existing General Plan. This comment correctly reiterates the conclusion reached in the DEIR in Section 2.14.3.1, Issue 1: Deterioration of Parks and Recreational Facilities, which states:

"The forecasted increase in population under the proposed General Plan Update is also likely to result in an increase in the need for recreational facilities located outside of the County's jurisdiction, such as within jurisdictions that border the western CPAs and on federally and State-owned lands. The County does not have land use jurisdiction over these areas; however, any recreational facilities that are open to the public are available for use by County residents. An increased demand for recreational facilities in areas outside the County would potentially lead to their physical deterioration from increased usage by County residents."

Mitigation for this impact is provided under Section 2.14.6.1, Issue 1: Deterioration of Parks and Recreational Facilities.

L9-20 This comment states that the County General Plan Update could have a direct and cumulative impact on recreational facilities in San Marcos, which is not addressed by mitigation measures provided in the DEIR. The analysis provided in Section 2.14.3.1, Issue 1: Deterioration of Parks and Recreational Facilities, for direct impacts and Section 2.14.4.1, Issue 1: Deterioration of Parks and Recreational Facilities, for cumulative impacts, concur that implementation of the General Plan Update would result in a potential direct and cumulative impact to surrounding jurisdiction's recreational facilities, including the City of San Marcos. However, the City incorrectly states that these impacts are unmitigated. Within the DEIR, Section

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2.14.6.1, Issue 1: Deterioration of Parks and Recreational Facilities, identifies both General Plan Update policies and mitigation measures that would reduce both direct and cumulative impacts to recreational facilities, including those in surrounding jurisdictions like San Marcos, to a less than significant level.

L9-21 This comment states that the County should require that projects proposed under the General Plan Update pay a fair share contribution for park improvements in the event they have direct or cumulative impacts on adjacent jurisdictions' recreational facilities. General Plan Update Policy COS-24.1, Park and Recreation Contributions, addresses this issue by requiring development to provide fair-share contributions, consistent with local, State and federal law. Mitigation measure Rec-1.2 also addresses this issue by establishing continued partnerships with other jurisdictions to share operation and maintenance costs for facilities. Additionally, mitigation measure Rec-1.5 implements the Park Lands Dedication Ordinance, which requires the payment of recreational fees for funding and land acquisition. Finally, the appropriate level of specificity required for a Program EIR (refer to response to comment L9-15) does not necessitate the identification of mitigation measures related specifically to the provision of recreational facilities in individual adjacent cities, including San Marcos.

L9-22 This comment refers to the definition of "general alignment" which is used in the Community Trails Master Plan (CTMP) to describe the general location of a future trail generally within a quarter-mile wide corridor. The comment suggests that the definition of "general alignment" be modified due to past confusion by San Marcos residents. However, this definition is taken directly from the CTMP and is only used in the DEIR in a summary of the CTMP in Section 2.14.2.3, Local Regulatory Framework. The CTMP was approved separately with a separate environmental document pursuant to CEQA. Therefore, this comment does not raise an issue related to the proposed project.

L9-23 This comment requests the DEIR identify the Inland Rail-Trail as a regional trail on DEIR Figure 2.14-2. The proposed Inland Rail-Trail is a paved 23-mile bicycle facility connecting Escondido to Oceanside via the Sprinter light rail corridor. This trail is not included because it is not part of the County regional trail network. The Inland Rail-trail is paved; however, County regional trails are unpaved soft-surfaced multi-purpose trails for non-motorized recreational use. This trail is identified in the County of San Diego Bicycle Transportation Plan.

L9-24 This comment requests that the General Plan Update include a Master Park Plan to mitigate the potential deficiency in recreational facilities. The DEIR includes mitigation measures in Section 2.14.6.1, Issue 1: Deterioration of Parks and Recreational Facilities, which would mitigate recreational impacts from implementation of the General Plan Update to below a level of significance. Additionally, the San Diego County Department of Parks and Recreation (DPR) maintains a Five-Year Parks Improvement Plan that identifies future recreational projects and recreational improvement projects throughout the unincorporated County. Therefore, the County maintains a long-term planning document, which

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serves the same function as the Master Park Plan suggested by the City of San Marcos.

L9-25 This comment states that the identified segment of Deer Springs Road should not require an upgrade to six travel lanes. The General Plan Update DEIR traffic forecast model identified 41.7 to 46.7 average daily traffic (ADT) for Deer Springs Road (Buena Creek Road to Interstate 15). A six-lane 6.2 Prime Arterial classification is consistent with the forecast ADT as the threshold capacity for a four-lane Major Road is 33,400 ADT trips. This comment, which includes the commenter's assertion that Deer Springs Road is forecast to have adequate capacity to accommodate traffic volumes through 2030 will become part of the Final EIR and available to the Board of Supervisors, who will ultimately determine the classification for Deer Springs Road.

L9-26 This comment states that the City of San Marcos is in the process of updating its General Plan, which will include a recommendation for the appropriate roadway designation for Twin Oaks Valley Road and Deer Springs Road. The County welcomes additional site-specific information from the City upon completion of this process. This comment does not appear to raise a significant environmental issue to which further response is required.

L9-27 This comment indicates that recent traffic studies performed for projects in the City of San Marcos show different Levels of Service (LOS) and ADT levels than those identified in Table 4.1 within Appendix H, Traffic Impacts to Adjacent City Jurisdictions. The County forecasts are based on the adopted General Plans for the incorporated jurisdictions at of the Year 2000. Therefore, recent development projects that are not consistent with the Year 2000 San Marcos General Plan would not be included in this countywide forecast. In addition, a countywide forecast does not have the level of detailed analysis as the traffic forecast from a specific project.

As discussed under the Methodology of Traffic and Circulation Assessment subheading of Section 2.15.3.1, Issue 1: Unincorporated County Traffic and LOS Standards, the Traffic and Circulation Assessment prepared by Wilson & Company, included as Appendix G to the DEIR, utilized the SANDAG Series 10 Regional Forecast model, assuming development as forecast for the year 2030 in the incorporated areas in the County, along with build-out of the respective land use maps for the unincorporated County. The larger, more general Series 10 regional Traffic Analysis Zones (TAZs) were subdivided into smaller units/zones in the unincorporated area in order to ensure the accuracy and validity of the traffic forecasts.

L9-28 The County agrees that the roadway designations identified in Appendix H, Traffic Impacts to Adjacent City Jurisdictions, for the following roadways are incorrect: Twin Oaks Valley Road, La Cienega and Mulberry. Appendix H has been revised with the correct roadway designations. However, as shown below, the corrected roadway designations do not result in any additional significant traffic impacts.

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Roadway	Segment	Revised Classification	Existing GP		Proposed GP	
			ADT	LOS	ADT	LOS
Twin Oak Valley Rd	Deer Springs Rd to Buena Creek Rd	4-Ln Major	22,000	C	25,000	C
	Buena Creek Rd to Olive St	4-Ln Major	20,900	B	20,100	B
La Cienega	Twin Oak Valley Rd to Mulberry	Collector	6,300	B	5,600	B
Mulberry	Olive St to La Cienega	Collector	6,200	B	3,700	A

L9-29 This comment indicates that recent traffic studies performed by the City of San Marcos result in different LOS and ADT levels than shown in Table 4.3 in Appendix H, Traffic Impacts to Adjacent City Jurisdictions. Refer to response to comment L9-27 for additional information regarding the assumptions of the model utilized in the Traffic and Circulation Assessment.

L9-30 The County agrees with this comment that the roadway designations identified in Appendix H, Traffic Impacts to Adjacent City Jurisdictions, for the following roadways are incorrect: Twin Oaks Valley Road, La Cienega and Mulberry. Refer to response to comment L9-28. Appendix H has been revised with the correct roadway designations.

L9-31 Similar to comments L9-29 and L9-30 this comment discusses how forecast traffic volumes conducted from recent studies for projects in the City of San Marcos are different than the information presented in Appendix H, Traffic Impacts to Adjacent City Jurisdictions in Table 5.3, Significant Traffic Impacts County of San Diego General Plan Update (Referral Map) Vs. Existing Conditions. Refer to response to comment L9-27. Additionally, Appendix H has been revised with the correct roadway designations for Twin Oaks Valley Road, La Cienega and Mulberry. Refer to response to comment L9-28 for additional information on this revision.

L9-32 The County disagrees that the SANDAG Series 11 Combined North County Model should be used to reconcile the differences between the DEIR traffic model and the North County model. For reasons of continuity and consistency, it was the decision of the County, as Lead Agency, to continue to utilize the Series 10 model as the foundation for General Plan Update. Use of this model is consistent with traffic modeling in the County for the General Plan Update that has been ongoing for over ten years. The model has been calibrated to response to land uses in the unincorporated County and it provides a reasonable representation of traffic conditions that would result from the General Plan Update. No evidence has been provided that the DEIR model is flawed. Therefore, no grounds have been established to reject the model.

L9-33 This comment requests that the DEIR analyze the General Plan Update's impacts on City of San Marcos streets and key intersections where impacts are anticipated. The

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General Plan Update EIR is programmatic on a regional scale. As such, the DEIR analyzes impacts on City streets but does not analyze impacts on City intersections. DEIR Appendix H, traffic Impacts to Adjacent Jurisdictions, documents significant traffic impacts on major arterials located in adjacent incorporated jurisdictions resulting from the General Plan Update. In addition, major streets located in adjacent jurisdictions that are anticipated to be impacted by implementation of the General Plan Update are analyzed in Section DEIR 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards. As shown in Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, three street segments in the City of San Marcos are anticipated to be impacted by the proposed project.

The DEIR does not analyze unincorporated County intersections or intersections within adjacent cities because of the extremely large study area for the proposed project, which encompasses 16 incorporated jurisdictions and the unincorporated County. This is discussed in the DEIR under the heading Methodology of Traffic and Circulation Assessment in Section 2.15.3.1, Issue 1: Unincorporated County Traffic and LOS Standards. As stated in the DEIR "In order to provide a program-level analysis of the project area, traffic operations were evaluated by consideration of daily roadway segment operations rather than peak-hour intersection operations. The evaluation of peak hour intersection operations would be appropriate for addressing specific transportation corridors (i.e., intersections) that may be impacted by a proposed project. This approach is not feasible for the proposed project, due to its size."

L9-34 This comment requests an explanation for the selection of City streets analyzed within DEIR Appendix H, Traffic Impacts to Adjacent City Jurisdictions. This explanation is provided in Section 1.2, Project Study Area and Scenario, of Appendix H. As stated in this section, roadway segments were chosen for this analysis based upon the respective jurisdictions' responses to the DEIR Notice of Preparation (NOP). Appendix A of the DEIR provides the DEIR NOP comment letters received, which identify these roadways. As provided in Appendix A, the City of San Marcos submitted a letter that specifically requested an evaluation of Las Posas Road, Twin Oaks Valley Road, Mulberry Drive and La Cienega Road. Therefore, various segments of these roadways were included in the traffic modeling conducted for the adjacent cities analysis. Refer to Table 4.3, 2030 Forecast Roadway Level of Service by Jurisdiction - County of San Diego General Plan Update (Referral Map), in Appendix H, Traffic Impacts to Adjacent City Jurisdictions, for a complete list of the roadway segments analyzed. Within the DEIR, Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, identifies that three of the 11 roadway segments analyzed within the City of San Marcos would be impacted upon implementation of the proposed project.

L9-35 This comment requests a discussion that identifies the County's role in mitigating forecasted transportation and traffic impacts on adjacent jurisdictions' roadways and intersections. The DEIR addresses the issue of impacts to other jurisdictions' roadways from implementation of the proposed project in Section 2.15.3.2, Issue 2: Adjacent Cities Traffic and LOS Standards. This section concludes that when compared to existing conditions, implementation of the General Plan Update would

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result in 34 roadway segments in adjacent cities that would exceed the LOS standard established by the respective city. Section 2.15.6.2, Issue 2: Adjacent Cities Traffic and LOS Standards, identifies General Plan Update policies and mitigation measures that would reduce the anticipated transportation and traffic impacts to adjacent jurisdictions' roadways. For example, General Plan Update Policy LU-4.2, Relationship of Plans in Adjoining Jurisdictions, General Plan Update Policy M-4.6, Interjurisdictional Coordination, and mitigation measure Tra-2.1 all require coordination with adjacent cities to reduce anticipated transportation impacts. However, the DEIR concludes that even with implementation of the proposed General Plan Update policies and mitigation measures; project-related impacts to adjacent jurisdictions' roadways would remain significant and unavoidable. However, as the General Plan Update DEIR has been prepared at the programmatic level, further mitigation to city streets and intersections could be considered as individual projects go forward.

Refer to response to comment L9-33 for an explanation concerning the omission of intersections from the traffic analysis in Appendix H, Traffic Impacts to Adjacent City Jurisdictions.

L9-36 This comment recommends the County consider requiring Transportation Demand Management (TDM) as a mitigation strategy. The DEIR does include General Plan Update policies and mitigation measures that require TDM strategies in various forms. For example, Section 2.15.6.1, Issue 1: Unincorporated County Traffic and LOS Standards, includes General Plan Update policies which incorporate TDM strategies intended to reduce traffic impacts. Draft Policy M-9.2, Transportation Demand Management, requires large commercial and office projects to use TDM programs. Additional policies that indirectly address TDM programs include Policy M-5.1, Regional Coordination; Policy LU-10.4, Commercial and Industrial Development; and Policy LU-11.8, Permitted Secondary Uses. Additionally, mitigation measures Tra-1.2 and Tra-1.6 involve TDM strategies in various forms to reduce traffic and LOS impacts. Additional TDM programs could be considered as individual projects are processed.

L9-37 This comment requests that the County coordinate with the City of San Marcos to improve traffic conditions on interconnecting roadway facilities. However, this comment does not raise an issue with the General Plan Update, rather refers more to the need for ongoing interjurisdictional coordination. This issue is addressed in General Plan Update Policy M-4.6, Interjurisdictional Coordination, which requires coordination with adjacent cities to mitigate traffic impacts. Please refer to Section 2.15.6.2, Issue 2: Adjacent Cities Traffic and LOS Standards, to review this policy.

L9-38 This comment correctly states that the General Plan Update is expected to result in a significant traffic impact to portions of SR-78 within the City of San Marcos (see DEIR Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project). Section 2.15.6.2, Issue 2: Adjacent City Jurisdictions Traffic and LOS Standards, provides General Plan Update policies and mitigation measures that would reduce impacts to adjacent city jurisdictions. Specifically, the following policies involve coordination with adjacent cities to reduce traffic impacts: Policy M-4.6,

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Interjurisdictional Coordination, and Policy M-5.1, Regional Coordination. Additionally, mitigation measures Tra-1.1, Tra-1.2 and Tra-2.1 require inter-agency coordination in an effort to reduce traffic impacts to adjacent cities. However, the DEIR has determined that even with implementation of the proposed General Plan Update policies and mitigation measures; project related impacts to adjacent jurisdictions roadways would remain significant and unavoidable.

The comment goes on to further request that the County mitigate the anticipated impacts by contributing towards a corridor study. The County is committed to participating in the SR-78 Corridor Study, which it is our understanding that the study has already been funded and is underway. In addition, the County will consider cost sharing on improvement projects to SR-78 at the time the projects are developed so that these impacts to those facilities are evaluated comprehensively.

L9-39 This comment suggests the County require an in-lieu payment fee structure, specifically set aside for SR-78, for future development. While the DEIR does not specifically identify mitigation measures for impacts to SR-78, General Plan Update Policy M-3.2, Traffic Impact Mitigation, requires projects to contribute a fair share contribution toward financing transportation facilities. This policy applies to all roadways identified in Table 2.15-24, Significant Traffic Impacts to Adjacent Cities Resulting from the Proposed Project, including SR-78. Additionally, mitigation measure Tra-1.7 requires the mitigation of impacts to the Congestion Management Program network, including State facilities like SR-78. Mitigation measure Tra-1.8 requires the mitigation of transportation impacts through the payment of the County's Transportation Impact Fee (TIF) Ordinance. However, the DEIR has determined that even with implementation of the proposed General Plan Update policies and mitigation measures, project-related impacts to adjacent jurisdictions roadways would remain significant and unavoidable.

L9-40 This comment expresses a commitment from the City of San Marcos to participate in a SR-78 traffic corridor study and coordinate with SANDAG and Caltrans regarding capacity upgrades to SR-78. As discussed in response to comment L9-38, the County is also committed to participating in the corridor study and will consider contributing to projects once they are developed. County funding of projects must compete according of countywide priorities.

L9-41 This comment states that the DEIR does not clearly identify if the proposed project would result in an increase in surface water runoffs to San Marcos Creek. If runoff would increase, the commenter suggests that a financial contribution to improve downstream facilities should be considered as mitigation. As stated in DEIR Section 2.8.3.4, Issue 4: Flooding, Section 2.8.3.5, Issue 5: Exceed Capacity of Stormwater Systems, and Section 2.8.6.1 Issue 1: Water Quality Standards and Requirements, the proposed project is anticipated to result in an increase in surface runoff due to increases in impermeable surfaces associated with development accommodated by the General Plan Update that could result in flooding, the exceedance of stormwater drainage system capacity, or downstream water quality impacts. It can be assumed that implementation of the proposed General Plan Update would have the potential to increase surface water runoff volumes and pollutant delivery to San Marcos Creek

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because some of the runoff associated with future development in the unincorporated County would flow downstream to San Marcos Creek. However, Section 2.8.6.4, Issue 4: Flooding, and Section 2.8.6.5, Issue 5: Exceed Capacity of Stormwater Systems, and Section 2.8.6.1 Issue 1: Water Quality Standards and Requirements identify General Plan Update policies and mitigation measures that would reduce impacts associated with flooding, the exceedance of stormwater drainage system capacity, and downstream water quality impacts to a less than significant level. Specifically, the following General Plan Update policies and mitigation measures would reduce flooding, capacity, and downstream water quality impacts associated with increases in surface water runoff: Policy LU-6.5, Sustainable Stormwater Management; Policy S-10.6, Stormwater Hydrology; Policy S-10.5, Development Site Improvements; Policy, COS-5.2, Impervious Surfaces; and Policy COS-5.3, Downslope Protection. Additionally, mitigation measures Hyd-1.1, Hyd. 1-2, and Hyd-1.3 require that all development projects conform with standards and requirements established in the County of San Diego's Jurisdictional Urban Runoff Management Program (JURMP) and Watershed Protection Ordinance (WPO). These include, but are not limited to, the low impact development (LID), hydromodification management, and standard urban stormwater mitigation plan (SUSMP) requirements of the San Diego Municipal Stormwater Permit. These standards and requirements are designed to ensure that development minimizes runoff, reduces the adverse effects of pollutant discharges from the MS4 to the maximum extent practicable, prevents discharges from the MS4 from causing or contributing to a violation of water quality standards, and manages increases in runoff discharge rates and durations that are likely to cause increased erosion of stream beds and banks, silt pollutant generation, or other impacts to beneficial uses and stream habitat due to increased erosive force. Implementation of the identified General Plan Update policies and mitigation measures would reduce surface water runoff impacts, including runoff to San Marcos Creek, to a level below significant. Therefore, no additional mitigation measures are required, including a financial contribution to improve downstream facilities.

L9-42 This comment requests the mitigation measures within Section 2.8, Hydrology and Water Quality, be modified to include current and future San Diego County Municipal Stormwater Permit hydromodification development requirements to retain and infiltrate runoff on-site. This issue is addressed by General Plan Update Policy COS-5.2, Impervious Surfaces, and General Plan Update Policy COS-5.3, Downslope Protection, which require development to retain runoff at or near the site of generation. Please refer to Section 2.8.6.1, Issue 1: Water Quality Standards and Requirements, to review these policies. Additionally, processes developed by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards to improve water quality, such as storm water permits for new development and construction, would continue to be required for land uses and development implemented under the General Plan Update. This information is discussed under the heading Impacts Following Construction, in Section 2.8.3.1, Issue 1: Water Quality Standards and Requirements, of the DEIR. See also response to comment L9-41 above.

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L9-43 This comment states that Table 2.8-1, Water Bodies Identified as Impaired under the Clean Water Act, does not identify Agua Hedionda Creek, Lake San Marcos and San Marcos Creek under the Carlsbad Watershed Management Area (WMA). The commenter also provides an attachment as a reference document which shows these water bodies to be listed on the 303(d) list. The commenter incorrectly stated that Table 2.8-1 does not identify Agua Hedionda Creek under the Carlsbad WMA; however, the commenter is correct in determining that Lake San Marcos and San Marcos Creek were omitted from Table 2.8-1. Therefore, Table 2.8-1 has been modified to include Lake San Marcos and San Marcos Creek as impaired water bodies in the Carlsbad WMA.

L9-44 This comment indicates that the SWRCB will be updating their 303(d) list of water quality impaired water bodies in 2009 and requests this updated information be included in the DEIR. The County appreciates and acknowledges this information. However, existing baseline conditions provided in the DEIR describe conditions on or around April 2008, which is the when the NOP was circulated for public review. This is consistent with Section 15125 of the CEQA Guidelines, which states that "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published." As such, no revisions were made to the DEIR in response to this comment.

L9-45 This comment suggests that policies or mitigation measures identified in the DEIR to reduce pollutant loading to 303(d) water bodies be coordinated with respective watershed planners. In the County, the Department of Public Works reviews Stormwater Management Plans that are required for individual projects, in accordance with Sections 67.803(c)(1) and 67.803(c)(2) of the County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO). Internal review processes are in place to ensure that development achieves the standards and requirements established in the JURMP and the WPO as required by the San Diego Municipal Stormwater Permit. These processes would not change with implementation of the proposed General Plan Update EIR. Therefore, no revisions to the DEIR were made in response to this comment.

L9-46 This comment requests that Section 2.8.6.1, Issue 1: Water Quality Standards and Requirements, of the DEIR be revised to identify mitigation measures and General Plan Update policies that reduce pollutant loads to 303(d) listed water bodies through pollutant management plans or Best Management Practices (BMPs). As discussed above in response to comment L9-45, General Plan Update Policy COS-5.5, Impacts of Development, would reduce pollutant loads to all water bodies in the unincorporated County, including those listed on the SWRCB 303(d) list. Additionally, General Plan Update Policy LU-6.5, Sustainable Stormwater Management, and mitigation measure Hyd-1.3 require implementation of low impact development standards, which are synonymous with BMPs because they require environmental practices that mitigate water quality impacts by maintaining and enhancing the pre-development hydraulic regime of urban and developing watersheds. Therefore, the DEIR does include mitigation measures that would reduce pollutant loads. Please also refer to Section 5.2.3 of the draft Implementation Plan.

Responses to Letter L 9, City of San Marcos (cont.)

L9-47 This comment requests a discussion of the Municipal Separate Storm Sewer Systems (MS-4) Permit under Section 2.8.2.3, Regional/Local regulations. The DEIR discusses required municipal compliance with the MS-4 Permit under Section 2.8.2.2, State regulations under the discussion of the National Pollution Discharge Elimination System Permits. Therefore, the DEIR does reference the MS-4 Permit and no changes to the DEIR have been made.

L9-48 The County appreciates the comment and has subsequently held meeting with City of San Marcos staff and will continue to coordinate with them.

Comment Letter L 10, Sweetwater Authority

SWEETWATER AUTHORITY
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August 28, 2009

Mr. Devon Muto
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Subject: COMMENTS ON DRAFT EIR FOR GENERAL PLAN UPDATE

Dear Mr. Muto:

L10-1. Sweetwater Authority has reviewed the Draft EIR for the County's General Plan Update. Our comments pertain specifically to the EIR section numbers and page numbers identified below. Recommended revisions are underlined.

2.8 Hydrology and Water Quality

L10-2. ▪ Section 2.8.1.4, Page 2.8-20, Nitrates: Potable water, whether from local or imported supplies, does not contain significant amounts of nitrates.

2.9 Land Use

L10-3. ▪ Section 2.9.1.2, Page 2.9-19, Sweetwater CPA: Much of the Sweetwater River floodplain is preserved for County parkland. Since 2004, shoreline fishing has been allowed on a limited basis on the south side of Sweetwater Reservoir, (along the CPA's northern border). The Sweetwater Reservoir Riding and Hiking Trail, operated through an easement granted to the County of San Diego, also runs along the south side of the reservoir.

2.14 Recreation

L10-4. ▪ Section 2.14.1.2, Page 2.14-4, Local Government and Public Utility-Owned Lands: Many districts provide multi-use trails and staging areas, such as Olivenhain Water District in the San Dieguito CPG, and the Otay Water District and Sweetwater Authority, both in the Sweetwater CPA.

L10-5. ▪ Section 2.14.2.3, Page 2.14-11, Regional Trails Plan: The Regional Trails Plan identifies County-approved general alignment corridors of regional trails in the County. Note: The Loop Trail included on the Regional Trails Plan list and displayed on Figure 2.14-2, Regional Trails Map, has not received final approval from Sweetwater Authority.

Comment Letter L 10, Sweetwater Authority (cont.)

Mr. Devon Muto
Re: COMMENTS ON DRAFT EIR FOR GENERAL PLAN UPDATE
August 28, 2009
Page 2

2.16 Utilities and Service Systems

L10-6. ▪ Section 2.16.1.1, Page 2.16-9, Sweetwater Authority/South Bay Irrigation District (SA/SB): SA/SB serves approximately 32,560 connections over a service area of 20,480 acres. Depending on the amount of local rainfall received, as much as 70 percent of the water supply is obtained from the SDCWA while as little as 30 percent is obtained from local sources. SA/SB operates 388 miles of pipelines, 23 pump stations, 9 groundwater production wells, the Perdue Water Treatment Plant (30 mgd capacity), the Reynolds Groundwater Desalination Facility (4 mgd capacity), Sweetwater Reservoir (28,079 AF capacity), and Loveland Reservoir (25,387 AF capacity). SA/SB provides 71 percent of its water service to residential land uses, 18 percent to commercial land uses, 9 percent to government land uses, 2 percent to industrial land uses, and less than one percent to agricultural land uses. Average daily consumption for SA/SB is 19.5 mgd.

L10-7. We appreciate the opportunity to comment on the Draft EIR for the County's General Plan Update. If you have any questions, please contact Jane Davies at (619) 409-6816 or jdavies@sweetwater.org.

Sincerely,
SWEETWATER AUTHORITY

Don Thomson
Director of Water Quality

cc: James L. Smyth, Sweetwater Authority
Jack Adam, Sweetwater Authority

o:\egs\sd county draft gen plan\comments on draft EIR for gen plan update, 20090828

Responses to Letter L 10, Sweetwater Authority

L10-1 This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

L10-2 The County appreciates the comment and has added the following sentence to DEIR Section 2.8.1.4 under the heading "Nitrates" as recommended:

"Potable water, whether from local or imported supplies, does not contain significant amounts of nitrates."

L10-3 The County appreciates the comment and has made the following revision to DEIR Section 2.9.1.2 under subheading "Sweetwater CPA" as recommended:

Much of the Sweetwater River floodplain is preserved for County parkland. Since 2004, shoreline fishing has been allowed on a limited basis on the south side of the Sweetwater Reservoir; along the CPA's northern boundary. The Sweetwater Reservoir Riding and Hiking Trail, operated through an easement granted to the County of San Diego, also runs along the south side of the reservoir~~, although the Sweetwater Reservoir (along the CPA's northern border) is not open for public use~~

L10-4 The County agrees with this comment and has replaced the term "Sweetwater Water District" with "Sweetwater Authority" in DEIR Section 2.14.1.2 as recommended.

L10-5 The County appreciates the comment and has added the term "County-approved" to DEIR Section 2.14.2.3 as suggested.

L10-6 The County appreciates the comment and has made the following changes to DEIR Section 2.16.1.1 as suggested.

"The SA/SB provides water service to National City, the northern part of Bonita, and the western portion of Chula Vista. SA/SB serves approximately ~~33,785~~32,560 connections over a service area of 20,480 acres. ~~Approximately~~ Depending upon the amount of rainfall received, as much as~~45~~70 percent of the water supply is obtained from the SDCWA while ~~the remaining 55~~as little as 30 percent is obtained from local sources. SA/SB operates 388~~90~~ miles of pipelines, 23 pump stations, ~~11~~9 groundwater production wells, the Perdue Water Treatment ~~Facility~~ Plant (30 mgd capacity), the ~~Demin Treatment~~Reynolds Groundwater Desalination Facility (4 mgd capacity), Sweetwater Reservoir (28,079 AF capacity), and Loveland Reservoir (25,387 AF capacity). SA/SB provides 88 percent of its water service to residential land uses, 18~~0~~ percent to commercial land uses, ~~two~~ nine percent to government land uses, ~~and less than one~~two percent to ~~both~~ industrial land uses, and less than one percent to agricultural land uses. Average daily consumption for SA/SB is ~~22~~19.5 mgd.

L10-7 This comment is conclusive in nature and does not raise a significant environmental issue for which a response is required.

Comment Letter L 11, Valley Center Water District

VALLEY CENTER WATER DISTRICT

A Public Agency Organized July 12, 1954

August 18, 2009

Devon Muto
County of San Diego
Dept of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Dear Mr. Muto:

Thank you for the opportunity to respond to the July 1, 2009 Draft Environmental Impact Report. Corrections for the Valley Center Water District (VCWD) are necessary within Section 2.16.1.2 Wastewater Collection, Transmission and Disposal. VCWD no longer owns or operates the Water Reclamation Facilities (WRF) for Skyline Ranch; however the District does operate the WRF serving the Woods Valley Ranch subdivision. Therefore following corrections are suggested on pages 2.16-23 and 2.16-24:

Valley Center Water District (VCWD)

L11-1. The majority of VCWD service area is served by individual septic systems. VCWD is an independent district that provides wastewater service to a small portion of its 62,100 acres service area. VCWD also provides water service, as discussed in Section 2.16.1.1, Potable Water Supply and Distribution. The VCWD service area includes the following: 1) the I-15 corridor area, including Hidden Meadows, the Lawrence Welk Specific Plan Area and Castle Creek Country Club; which is served by the Lower Moosa Canyon WRF, 2) the Woods Valley Ranch subdivision which is served by the Woods Valley Ranch WRF. VCWD operates these two water reclamation facilities. The Lower Moosa Facility has a capacity of 0.5 mgd and an average flow of 0.35 mgd. The Woods Valley Ranch Facility has a capacity of 70,000 gpd and an average flow of 45,000 gpd.

If you have any questions, please call me at 760 749 1603 ext 259.

Sincerely,

Dianne Kilwein, P.E.

Responses to Letter L 11, Valley Center Water District

L11-1 The comment is noted and the following recommended changes have been incorporated into DEIR Section 2.16.1.2 under the subheading "Valley Center Municipal Water District (VCMWD):

"The majority of VCMWD service area is served by individual septic systems. VCMWD is an independent district that provides wastewater service ~~over a service area of~~to a small portion of its 62,100 acres service area. VCMWD also provides water service, as discussed in Section 2.16.1.1, Potable Water Supply and Distribution. The VCMWD service area includes the following: 1) the I-15 corridor area, including Hidden Meadows, the Lawrence Welk Specific Plan Area and Castle Creek Country Club, which is served by the Lower Moosa Canyon Water Reclamation Facilities (WRF); and 2)~~ the Skyline Ranch Country Club and a mobile home park on Paradise Mountain; and 3)~~ the Woods Valley Ranch subdivision which is served by the Woods Valley Ranch WRF. VCMWD operates these two water reclamation facilities.~~: Lower Moosa Canyon Water Reclamation Facility and Skyline Ranch Country Club Water Reclamation Facility~~. The Lower Moosa Facility has a capacity of 0.5 mgd and an average flow of 0.~~25~~ 35 mgd. The ~~Skyline~~ Woods Valley Ranch Facility has a capacity of ~~5~~70,000 gpd and an average flow of ~~3~~45,000 gpd."