

Responses to Comments

The focus of the responses to comments is on the disposition of significant environmental issues raised in the comments, as specified by Section 15088(c) of the California Environmental Quality Act (CEQA) Guidelines. When a comment is not directed to significant environmental issues, the responses indicate that the comment has been acknowledged and no further response is necessary.

List of Commenters

During the public review period, a total of 312 comment letters were received on the Draft EIR. The comment letters have been categorized by sender (e.g., agency, organization, individual) and assigned a unique letter-number designation based on category.

The list of commenters and the unique letter-number designators for each letter are shown below in Table Response To Comments-1, List of Commenters. Individual comments within each letter are bracketed and subsequently numbered in the right-hand margin of the comment letter. Bracketed/numbered comment letters are placed before the responses to the letter.

Table Response To Comments-1. List of Commenters

Commenter	Letter No.	On Page:
State Agencies		
California Department of Transportation (Caltrans)	S1	RTC-39
California Department of Fish and Wildlife	S2	RTC-43
California Native American Heritage Commission	S3	RTC-59
Local Agencies		
Poway Unified School District	L1	RTC-65
San Diego Association of Governments	L2	RTC-69
Organizations		
Sierra Club	O1	RTC-71
Carmel Mountain Ranch United	O2	RTC-93
Carmel Mountain Ranch/Sabre Springs Community Council	O3	RTC-129
San Diego County Archaeological Society, Inc.	O4	RTC-147
DeLano & DeLano on behalf of Carmel Mountain Ranch Residential Community Association	O5	RTC-149
Individuals		
Jacqueline Weir	I1	RTC-273
John Patterson	I2	RTC-277
Ling	I3	RTC-279
Myles	I4	RTC-281
Yashar Mirabolfathi	I5	RTC-283
Amin Salmani	I6	RTC-287
Bhaskaran and Adelaida Vasudev	I7	RTC-289
Bill Breyers	I8	RTC-291

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Commenter	Letter No.	On Page:
Bruce Forinash	I9	RTC-293
Cesar and Luisa Jaro	I10	RTC-295
Dawn Summers	I11	RTC-297
Hannah Mason	I12	RTC-299
Harish Pillai	I13	RTC-301
Jamie and Eric Kahlen	I14	RTC-307
Jeanne Preves	I15	RTC-309
Jennifer Singer	I16	RTC-311
Jessica Nguyen	I17	RTC-313
Jules Hayashi	I18	RTC-315
Karen Mullen	I19	RTC-317
Mark Nicholson	I20	RTC-319
Michael Collins and Leticia Lopez	I21	RTC-321
Michael Yim	I22	RTC-323
Paul Jamason	I23	RTC-325
Sassan Shahrokhinia	I24	RTC-327
Shashanka Dontula	I25	RTC-329
Steve Anderberg	I26	RTC-331
Thomas/Yingjie Peng	I27	RTC-333
Viktoria	I28	RTC-335
Stuart Turner	I29	RTC-337
Judy Merry	I30	RTC-339
Shubham Khandelwal	I31	RTC-341
Colin and Campbell Naismith	I32	RTC-343
Jody Neiss	I33	RTC-349
Margaret Blascak	I34	RTC-353
Jack Doxey	I35	RTC-355
Jeff/Hyun Sang Lee	I36	RTC-357
John Patrick Anamosa	I37	RTC-363
Alberto Fernandez-Arteaga	I38	RTC-367
Ali and Gilan Khodafar	I39	RTC-369
Alicia Waldron Deutz	I40	RTC-371
Bruce Forinash	I41	RTC-373
Cara Zylla-Paterson	I42	RTC-377
Cesar and Luisa Jaro	I43	RTC-381
Dara Greaney	I44	RTC-383
Delaram Naghneh	I45	RTC-385
Frank Sowin	I46	RTC-387

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Commenter	Letter No.	On Page:
Gil and Katherine Quinones	147	RTC-389
Jennifer Wilkes	148	RTC-391
Joel Corona	149	RTC-395
John and Christine W. Gleason	150	RTC-397
Kathleen Jensen	151	RTC-399
Kathleen Stahl	152	RTC-401
Khiet Ho	153	RTC-403
Kiyoung/Kyle Lee	154	RTC-405
Leslie Hemmerling	155	RTC-407
Madonna Johnson	156	RTC-409
Marc Lazernik	157	RTC-411
Marc Lazernik	158	RTC-413
Mark Suycott	159	RTC-415
Namhyuk Cho	160	RTC-419
Paul Shevelkin	161	RTC-421
Rafael A. Arreola	162	RTC-423
Raghavendar Anumasa	163	RTC-425
Rajiv Bachhu	164	RTC-427
Ralph Pyeatt	165	RTC-429
Richard Hill	166	RTC-431
Robert Helin	167	RTC-433
Robert and Cate O'Reilly	168	RTC-435
Rose Trevi	169	RTC-437
Sarah Gutz	170	RTC-439
Savina Shivaee	171	RTC-441
Stephen and Trish Romero	172	RTC-443
Steve (last name unknown)	173	RTC-445
Steve Moonsanman	174	RTC-447
Steven Fischer	175	RTC-449
Suchismita Subudhi	176	RTC-451
Teresa R. Perez	177	RTC-453
Timothy Bunch	178	RTC-455
Todd Preece	179	RTC-457
Tricia Tan	180	RTC-459
Vadim Polonichko and Maya Iskandar	181	RTC-461
Victoria and Richard Rodgers	182	RTC-463
William Burrow	183	RTC-465
Zeying Ma	184	RTC-467

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Commenter	Letter No.	On Page:
Zoya Asgari	I85	RTC-469
Richard Kaung	I86	RTC-471
Shahla Askari	I87	RTC-473
Arpita Gupta	I88	RTC-475
Ali Falahi	I89	RTC-477
Shai Barkai	I90	RTC-479
Shenyan Gu	I91	RTC-481
Bharat and Urmila Singh	I92	RTC-483
Brent Cottom	I93	RTC-485
Brigid Hernandez	I94	RTC-489
Cheryl Pryatel	I95	RTC-491
Chinh "Jim" Hoang	I96	RTC-497
Dawn Nowlin	I97	RTC-499
Dawn Nowlin	I98	RTC-501
Donald Leake	I99	RTC-503
Fawn Chang	I100	RTC-505
George Lerinsky	I101	RTC-507
Girish Charpe	I102	RTC-509
Gordon Wagner	I103	RTC-511
Gurdeep Bhat	I104	RTC-513
Hedy Kelley	I105	RTC-517
John Schroeder	I106	RTC-519
Jonathan Guerrant	I107	RTC-521
Kathleen Goodman	I108	RTC-525
Larry Goodman	I109	RTC-529
Lisa Suycott	I110	RTC-531
Margaret Cameron	I111	RTC-535
Maria Gulati	I112	RTC-537
Marina Vavilov	I113	RTC-539
Mark Shoukry	I114	RTC-541
Rex Harris	I115	RTC-543
Rick Ludwig	I116	RTC-561
Seid Hadi Rasouli	I117	RTC-563
Suzanne Clark	I118	RTC-565
Taoling Fu	I119	RTC-567
Troy Daum	I120	RTC-571
Vineet Kakar	I121	RTC-573
Werner Plagge	I122	RTC-575

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Commenter	Letter No.	On Page:
Zeying Ma	I123	RTC-577
Vivian Weiss	I124	RTC-579
Bella Ferrer	I125	RTC-581
Ankur Gupta	I126	RTC-583
Greg McClelland	I127	RTC-585
Janice Kawamura	I128	RTC-587
Mark Felker	I129	RTC-589
Michelle Ye	I130	RTC-591
Andrea Lizerbram	I131	RTC-591
Dawn Nowlin	I132	RTC-593
Michael Abdou	I133	RTC-595
Narasimma Meeniahswamy	I134	RTC-597
Nga Anamosa	I135	RTC-599
Alan Hahn	I136	RTC-601
Shilpa Hiremath Chandrashekhar and Jayesh Shridhar	I137	RTC-619
Karen Vogue	I138	RTC-623
Carol Sutton	I139	RTC-631
Marilyn Terrian	I140	RTC-633
Nancy Taerzsch	I141	RTC-635
Pamela Lacher	I142	RTC-637
Shelly Jaffe	I143	RTC-639
Teresa Cotton	I144	RTC-641
Tony L'Ecluse	I145	RTC-643
John Chiu	I146	RTC-645
Ming Han	I147	RTC-651
Michelle Nguyen	I148	RTC-657
Patricia Daum	I149	RTC-661
Kristen and Jonathon Greer	I150	RTC-663
Mark Malamud	I151	RTC-669
Kurt Carlson	I152	RTC-675
Leslie Wilson	I153	RTC-695
Cindy Gorniak-Toor	I154	RTC-697
Adam Szepekouski	I155	RTC-705
Susan Green	I156	RTC-707
Halina and Jeff Tesar	I157	RTC-709
Anthony Lysek	I158	RTC-713
Residents of Boulton Avenue, San Diego	I159	RTC-715
Adrienne Schroeder	I160	RTC-721

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Commenter	Letter No.	On Page:
Stuart Fagan	I161	RTC-723
Kathleen Harrington	I162	RTC-725
Cynthia Wootton	I163	RTC-727
David and Dagny Ferguson	I164	RTC-729
Ruben Diaz Avalos	I165	RTC-731
Kathleen Hagenbach	I166	RTC-733
Jeremy Owens	I167	RTC-735
David Wang	I168	RTC-737
Brittany Anderson	I169	RTC-739
Brian Nielsen	I170	RTC-741
Brenda Sappenfield	I171	RTC-743
Brandon Padilla	I172	RTC-747
Bob and Marti Bieksha	I173	RTC-749
Blake Sperry	I174	RTC-751
Beth Sperry	I175	RTC-753
Ashish Pandit	I176	RTC-755
Andrew Kalfayan	I177	RTC-759
Amy Spedale	I178	RTC-761
Allen Zeighami	I179	RTC-763
Ben and Maria Padilla	I180	RTC-765
Residents of 14144 Stoney Gate Place	I181	RTC-767
Douglas Crow	I182	RTC-773
Dien and Jennifer Ha	I183	RTC-775
Diane Jachim-Petroff	I184	RTC-777
Diana Walker	I185	RTC-779
Deepti Bhat	I186	RTC-781
Deborah Fontaine	I187	RTC-783
Dawn Nowlin	I188	RTC-785
David Downing	I189	RTC-787
Darrin Schwabe	I190	RTC-789
Daniela De Castri	I191	RTC-791
Daniel Shih	I192	RTC-793
Dan McCarthy	I193	RTC-795
Christine Reed	I194	RTC-797
Bill Ho	I195	RTC-799
Cathy Carr	I196	RTC-801
Caroline Palmer	I197	RTC-805
Bryan Sperry	I198	RTC-807

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Commenter	Letter No.	On Page:
Bruce Bergman and Family	I199	RTC-809
Chris Huang	I200	RTC-813
Martin Teal	I201	RTC-815
Maria Schneider	I202	RTC-817
Marcie Milner	I203	RTC-819
Lori McCarthy	I204	RTC-821
Loreen Arnold	I205	RTC-823
Leo and Lela Foshansky	I206	RTC-825
Lee Lowell	I207	RTC-827
Laurence Fontaine	I208	RTC-829
Laura Hodges	I209	RTC-833
Kristina and Greg Cosgrove	I210	RTC-835
Kimiko Yoshikawa	I211	RTC-837
Kerris Hardman	I212	RTC-839
Karuna Jay	I213	RTC-841
Julie and Mike Garcia	I214	RTC-843
Juliane Howes	I215	RTC-845
Joseph Marsella	I216	RTC-847
Jonathan Howes	I217	RTC-849
John Cooper	I218	RTC-851
John Barth	I219	RTC-853
Joe Rukaj	I220	RTC-855
Jimmy and Jasmine Hu	I221	RTC-857
Jeremy Briggs	I222	RTC-859
Jan Stephan	I223	RTC-861
Jan Barth	I224	RTC-863
James and Marianna Koehmstedt	I225	RTC-865
Jackie Yim	I226	RTC-867
Inese and JR Menvielle	I227	RTC-869
HR Taghavi	I228	RTC-871
Howard Holtzman and Roberto Zicari	I229	RTC-873
Germaine Gerlach	I230	RTC-875
George Katsanis and Michelle DeWindt	I231	RTC-877
George Asaad	I232	RTC-881
Florentino and Mariafe Salamt	I233	RTC-883
Eric Schleicher	I234	RTC-885
Patricia Lindgren	I235	RTC-887
Eliana Safar	I236	RTC-889

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Commenter	Letter No.	On Page:
Eduardo Lopez-Gibson	I237	RTC-891
E. Lisa Li	I238	RTC-895
Eric Spedale	I239	RTC-897
Eric and Deva Edelman	I240	RTC-899
Karen Vogue (2)	I241	RTC-905
John Neighbors	I242	RTC-907
Jim and Laura Peters	I243	RTC-909
Tyrone and Jennifer Dill	I244	RTC-911
Frank Primiano	I245	RTC-913
Peter Anderson	I246	RTC-917
Musa Safar	I247	RTC-919
Cecile Neighbors	I248	RTC-921
Matasaburo Yoshikawa	I249	RTC-923
Michael and Judi McCarter	I250	RTC-925
Michael Sperry	I251	RTC-931
Mike and Wendy Aguilar	I252	RTC-933
Mike Sperry (2)	I253	RTC-935
Mike Vallender	I254	RTC-937
Paula Bessey	I255	RTC-939
Prashant Khade	I256	RTC-943
Pri and Rick Mukherjee	I257	RTC-945
Ram Chintala	I258	RTC-947
Ramakrishna Popuri	I259	RTC-949
Rey and Lolita Soriano	I260	RTC-951
Richard Kawa	I261	RTC-953
Rich Krejci	I262	RTC-955
Rob Jones	I263	RTC-957
Robert Clark	I264	RTC-959
Robert Mallory	I265	RTC-961
Robert Ray	I266	RTC-965
Roger McWilliams	I267	RTC-967
Ron Cruger	I268	RTC-969
Saeed Sharifi	I269	RTC-971
Sapna Mehta	I270	RTC-973
Scott Leslie	I271	RTC-975
Shalendra Maharaj	I272	RTC-977
Patricia Lowell	I273	RTC-979
Resident	I274	RTC-981

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Commenter	Letter No.	On Page:
Srinivasa Ari	I275	RTC-983
Stacey McDonald	I276	RTC-985
Steve Nolan	I277	RTC-987
Subbarao Nelakuditi	I278	RTC-989
Sue Taetzsch	I279	RTC-991
Susana and Alan Kravit	I280	RTC-993
Susanne Lee	I281	RTC-995
Theresa Oneill	I282	RTC-997
Thong Cao	I283	RTC-999
Tim Phan	I284	RTC-1001
Tom Hodges	I285	RTC-1003
Tony Maude	I286	RTC-1005
Troy Brinza	I287	RTC-1007
Valentin and Elizabeth Sunico	I288	RTC-1011
Valerie Chandler	I289	RTC-1013
Vince Mario	I290	RTC-1015
Yash Murali and Saumya Manglik	I291	RTC-1017
Hamilton McWhorter	I292	RTC-1019
Cris Olsen	I293	RTC-1021
Shilpa Parikh	I294	RTC-1023
Jennifer Covin	I295	RTC-1025
Cooper Family	I296	RTC-1027
Nanette Tennant	I297	RTC-1029
Yolanda Mendiola	I298	RTC-1031
Valerie Thompson	I299	RTC-1033
Sonia Caskey	I300	RTC-1045
Jacqueline Weir	I301	RTC-1047
Betsy Holt	I302	RTC-1051
Sassan Shahrokhinia	I303	RTC-1053

Master Responses

The following Master Responses have been provided in order to address common themes or issues that were raised throughout the comment letters received during Public Review of the Draft EIR for the Trails at Carmel Mountain Ranch Project. These Master Responses are commonly referred to throughout the responses to comments received by agencies, organizations, and individuals.

Master Response 1 Land Use

The City of San Diego (City)- received numerous comments raising concern regarding community character, density, and land use consistency. This Master Response has been prepared to address those comments.

General Plan and Community Plan Consistency

CEQA Guidelines §15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision makers should address. A project is consistent with a general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment. Generally, a project need not be in perfect conformity with each and every general plan policy.

Furthermore, per the City's CEQA Significance Determination Thresholds, an inconsistency with a land use plan is not by itself a significant environmental impact; the inconsistency would need to relate to a secondary physical environmental issue to be considered significant under CEQA. As discussed in Section 5.1, Land Use, the project generally would not conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans. The project was assessed against the relevant goals and guidelines from the City's General Plan and the Carmel Mountain Ranch Community Plan.

Impacts associated with the increase in intensity on the site are analyzed and addressed throughout the Draft EIR, however, the land use consistency analysis takes several factors into consideration such as whether or not the project implements a principle, goal, or policy or directly conflicts with the implementation of a principle, goal, or policy included in a planning document. As detailed in Table 5.1-2 and Table 5.1-3 of Section 5.1, Land Use, of the Draft EIR, the proposed Trails at Carmel Mountain Ranch Project was assessed against the relevant goals and guidelines of the City's General Plan and the Carmel Mountain Ranch Community Plan. Impacts associated with project's consistency with the General Plan and Community Plan were determined to be less than significant.

The project site is designated Park, Open Space, and Recreation in the General Plan (City of San Diego 2008) and Private Recreation-Golf Course within the Carmel Mountain Ranch Community Plan (City of San Diego 1999). The Carmel Mountain Ranch Community Plan envisioned the golf course as a visual recreational amenity for the community that would provide an attractive separation between the various residential neighborhoods. However, the golf course has been closed for three years and remains vacant and unmaintained.

The project is concurrently processing a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation, which collectively would allow for the proposed residential development on site. The project proposes to redesignate approximately 52.9 acres of land designated for private recreational use with land uses that allow for residential development (Low-Medium Residential [6-29 dwelling units per

acre] and Medium Residential [30-43 dwelling units per acre]) as well as open space, public recreation, and trail amenities at the project site. The proposed land use changes would improve visual recreational amenities compared to the unmaintained, inactive, and inaccessible golf course (Section 5.17, Visual Effects and Neighborhood Character, of the Draft EIR). A majority of the project site (111 acres of the 164-acre project site) would be retained as open space.

The project would further the General Plan and Carmel Mountain Ranch Community Plan's Housing Element goals and policies by providing ~~120-180~~ affordable units that will be set aside for 55 years for households that do not exceed 65% of the Area Median Income. The redesignation of land currently designated for private recreation to a mix of residential, public park, and open space would help the City in meeting state and local housing goals by providing opportunities for new market-rate and deed-restricted housing to meet the needs of current and future City residents on vacant land centrally located near existing jobs and transit. Further, the addition of 1,200 multi-family units on the project site was assumed included in the recently approved General Plan Housing Element and Adequate Sites Inventory (Appendix D of the Housing Element). Refer to **Master Response 9** for more information on population and consistency with the General Plan Housing Element.

Furthermore, the proposed project would implement the following overarching goals of the General Plan (Also refer to Table 5.1-2 in Section 5.1, Land Use of the Draft EIR):

- General Plan Land Use Element
 - Goal B: General Plan Land Use Categories
 - Land use categories and designations that remain consistent with the General Plan Land Use Categories as community plans are updated and/or amended.
 - Goal C: Community Planning
 - Community plans that maintain or increase planned density of residential land uses in appropriate locations.
 - Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.
 - Goal D: Plan Amendment Process
 - Approve plan amendments that better implement the General Plan and community plan goals and policies.
 - Goal F: Consistency
 - Zoning concurrent with community plan updates and amendments to ensure consistency with community plan land use designations.
 - Zones or development regulations to better implement updated community plans.
 - Goal H: Balanced Communities and Equitable Development
 - Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.
 - Community and neighborhood-specific strategies and implementation measures to achieve equitable development.
 - Goal I: Environmental Justice
 - Ensure a just and equitable society by increasing public outreach and participation in the planning process.

- Equitable distribution of public facilities, infrastructure, and services throughout all communities.
- Improve mobility options and accessibility in every community.
- Promote and ensure environmental protection that will emphasize the importance of safe and healthy communities.

Regarding the Carmel Mountain Ranch Community Plan, a major goal for the development of the plan area is establishment of a balanced community where many daily trips to work, shopping, and services are internal (City of San Diego 1999). The proposed project will help further implementation of the following Carmel Mountain Ranch Community Plan goals (also refer to Table 5.1-3 in Section 5.1, Land Use of the Draft EIR):

- Accommodation of a variety of residential options through a diversity of product types and economic appeal, including 10% affordable housing.
- Incorporation of adequate means for multi-modal circulation within the community integrated with City and regional transportation planning.
- Incorporation of parks, trails, recreation and open space linked by pedestrian and bike paths to meet the needs and desires of users.
- Provision for sensible accommodation of, and effective financing for, public facilities and services, concurrent with community growth.

General Plan/Community Plan Amendment Process

The steps required to process a General Plan/Community Plan amendment are established in the City's General Plan Land Use Element (Section D) and further outlined in the Community Plan Amendment Manual, which is a companion item to the General Plan (City of San Diego 2011). All plan amendments are required to follow consistently applied practices to analyze issues and seek community and general public input, as well as provide for consistent noticing, adequate environmental review, and the necessary hearing processes. Further, all amendments must assist in enhancing and implementing the community plan goals and the vision expressed in the General Plan. The City requires either Planning Commission or City Council initiation of a plan amendment before a privately-proposed plan amendment and accompanying project may actually proceed.

Criteria, not findings, are used to evaluate the appropriateness of proceeding with a plan amendment initiation. Criteria better guide a policy discussion while findings give more precise evaluation tools for a quasi-judicial decision [such as a development permit].

On April 25, 2019, the applicant submitted for an amendment to the Carmel Mountain Ranch Community Plan. On July 10, 2019, the Carmel Mountain Ranch/Sabre Springs Community Council considered the request to initiate a Community Plan Amendment and voted in opposition of the request.

The Planning Department determined the proposed initiation met all of the initiation criteria. On July 25, 2019, after hearing public testimony and considering documents prepared and the Carmel Mountain Ranch/Sabre Springs Community Council recommendation, the Planning Commission voted to initiate the Community Plan Amendment. In their deliberation, Commissioners made comments about the need for additional housing in San Diego and identified issues related to how the proposed project would address view preservation, connectivity, provide parks and open space, and complement the existing development. The Planning Commission approved PC Resolution 5037-PC to initiate the plan amendment, and directed staff to analyze and evaluate the following issues:

- Appropriate land use designations, residential densities, and zoning for the site
- Appropriate size and boundary for the amendment site
- Site design considerations for the proposed land use designations
- The appropriate mix and siting of active and passive uses
- Provisions of amenities, public spaces, and pedestrian-scale elements associated with the proposed development and application of urban design guidelines
- Review of pedestrian and vehicular circulation patterns for safety and connection on the site as well as review of pedestrian/vehicular access into the property
- Climate Action Plan consistency and sustainable development features
- Noise attenuation measures for residential uses sited near Interstate 15
- Provision of additional benefit to the community
- Any other issues that may be identified during the review process

Upon submittal of the formal project application requesting a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation, the project was evaluated through multiple review cycles and a Draft EIR was prepared to address the impacts of the project. The applicant attended 25 Community Planning Group meetings, 16 in-person community workshops, and created a website to keep the community informed.

Community Character

Design Guidelines (Appendix B to the Draft EIR) have been established as a requirement of the Master Planned Development Permit to provide guidance and direction on site planning, building design and landscape design.

Per the Design Guidelines, the project would adapt to the topography of the site, wherever possible, in order to complement the existing natural topography and hillsides of the project site, through the provision of multi-level landscape and structures, integration of building step downs at existing slopes and retaining walls (although provision of retaining walls would be minimal), and design of the proposed rooftops to emphasize the character of the adjacent hillsides. Therefore, although the project would be visible from the Sabre Springs Open Space area located to the south of the site, the project would be compatible with the existing topography of the site and its surrounding. Also, due to distance between the project site and the open space area (ranging from 625 feet from the southernmost portion of the site to 1 mile from the northernmost portion of the site) and the elevation difference between the project site and open space trails, new structures on the project site would tend to blend with adjacent residential developments when viewed from the Sabre Springs Open Space area.

Regarding buffers, the project would include a minimum 50-foot buffer zone between existing homes and proposed new development, which may include open space and landscaped areas, for a total of 25.0 acres of buffer area. As stated in the Design Guidelines, circulation elements, such as drive aisles, driveways, parking areas, paths and trails would encroach into the buffer area for a maximum of 35% of the gross buffer lot area of each unit. The buffer area is comprised of three component parts: 1) a 15-foot landscape only zone, where no roads or other infrastructure is permitted; 2) a 15-foot limited use area, where parking is not allowed, but limited encroachments for access ~~is~~are permitted; and 3) a 20-foot area which would include parking, drive aisles, and other encroachments (see Design Guidelines Appendix B (Section 3(f)) to Draft EIR).

Further, as stated in Section 5.17, Visual Effects and Neighborhood Character, the Design Guidelines and Master Planned Development Permit include standards for height, bulk, and scale requirements, which would ensure that the project would be consistent with the bulk, height, and scale of the surrounding development. The project site is surrounded by residential development on all sides. Through compliance with the Design Guidelines and the San Diego Municipal Code, the project would not result in bulk, scale, materials, or style which would be incompatible with surrounding development. For additional information regarding materials and style, refer to the Design Guidelines (Appendix B). Impacts associated with community character were determined to be less than significant.

Zoning and Density

Most of the parcels within the project site are zoned Agricultural-Residential (AR-1-1). However, some of the smaller parcels (associated with the cart paths, cart tunnels, maintenance yard, and clubhouse) are zoned Residential-Single Unit (RS-1-13 and RS-1-14) or Residential-Multiple Unit (RM-1-1, RM-2-5, and RM-2-6) (City of San Diego 2005). The project proposes to rezone 52 acres to allow for residential use (~~RM-1-1 11.79 acres; RM-1-3 4.16 acres; RM-2-4 10.07 acres; RM-2-5 15.85; RM-2-6 2.29 acres; and RM-3-7 6.71 acres~~), CC-2-1 to allow for community commercial, and 7.87 acres to OP-1-1 to allow for public park space.

Development of the residential neighborhoods would be implemented through the above-mentioned Citywide zones with deviations from the otherwise applicable development standards as described in the Design Guidelines and implemented through the Master Planned Development Permit. The Master Planned Development Permit would allow increases in the height of structures within the different residential zones between 37 to 48 feet. Similarly, deviations are requested in lot area, setback, width, depth, and frontage throughout the project site as described in Section 5.1, Land Use, of the Draft EIR. Upon approval of the project, no conflicts with the applicable zoning or land use designations would occur.

Regarding density, the project proposes residential land uses that would be constructed within 52.9 acres and would range in density from 12.9 to 37.4 dwelling units per acre. The project would require the processing of a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation, which would increase the intensity of use and allow for the proposed residential development on site (see Table 3-1, Proposed Land Use and Zoning). Impacts associated with the increase in density/intensity on the site are analyzed and addressed throughout the EIR.

Master Response 2 Aesthetics

This Master Response has been prepared to address the numerous comments regarding alteration to public and private views, as well as landform alteration. Regarding community character, refer to Master Response 1. Private views, such as those from neighboring properties, are not protected under the City's Significance Determination Thresholds or CEQA.

In September 2013, the Governor Edmund G. "Jerry" Brown signed Senate Bill 743, which became effective on January 1, 2014. Among other provisions, Senate Bill 743 added Public Resources Code Section 21099, which states in subsection (d)(1) that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area [TPA] shall not be considered significant impacts on the environment."

According to ~~Statute~~ Public Resources Code Section 21099(a)(4), an "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75% of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." The project site is located on a vacant lot that has been previously developed with a golf course and more than 75% of the project site's boundary is adjacent to "qualified urban uses." According to Public Resources Code Section 21072, a "qualified urban use" means any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.

Furthermore, per Public Resources Code Section 21071, an "urbanized area" is defined as "(a) an incorporated city that meets either of the following criteria: (1) has a population of at least 100,000 persons, or (2) has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons." The proposed project is located within the City of San Diego, which has a population of approximately 1.4 million (U.S. Census Bureau 2019). Thus, the City is considered an urbanized area per CEQA.

The project site is located within a "transit priority area" as defined in Public Resources Code Section 21099. A "transit priority area" is defined as "an area within one-half mile of a major transit stop that is existing or planned." Public Resources Code Section 21064.3 defines a major transit stop as any of the following: (a) an existing rail or bus rapid transit station, (b) a ferry terminal served by either a bus or rail transit service, or (c) the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. The Metropolitan Transit System (MTS) Sabre Springs Transit Station (Station), located less than 0.5 miles from the project site, provides two bus routes with 15-minute service frequencies on weekdays (Routes 290 and 235). Therefore, the Station is considered to be a major transit stop pursuant to Public Resources Code Section 21064.3.

In accordance with Public Resources Code Section 21099(d)(1), the proposed project constitutes a residential project on an infill site within a transit priority area. Potential impacts to aesthetics are analyzed in Section 5.17, Visual Effects and Neighborhood Character, of the Draft EIR, which includes a discussion of visual character, scenic vistas, project bulk, scale, materials, and style, landmark trees, landform alteration, and light and glare. However, potential impacts under CEQA are not to be considered significant based on Public Resources Code Section 21099.

Finally, the project is proposed on an underutilized, privately-owned site adjacent to and surrounded by existing residential development, near transit and commercial facilities, and within an existing developed suburban community. Therefore, the project site is considered an infill site and would not be considered sprawl housing.

As noted in the City of San Diego CEQA Significance Thresholds document, views from private property are not protected. According to the City's CEQA Significance Thresholds, a project is considered to have a significant impact if the project would block public views from designated open space areas, roads, or parks or to significant visual landmarks or scenic vistas (e.g., Pacific Ocean, downtown skyline, mountains canyons, waterways). As stated in Section 5.17, Visual Effects and Neighborhood Character, given the short length of the available views to the project site and the lack of significant visual landmarks within the viewshed of all public roadways, these views are not considered to be scenic vistas for purposes of this analysis. The project would be partially visible from these roadways and would rise above the southern horizon line; however, project structures would not substantially block public views and would not obscure or otherwise interrupt available views to a significant visual landmark.

Because the project would not be located in a highly visible location, and through compliance with the project's Design Guidelines and the San Diego Municipal Code, the project would be consistent with the bulk, height, and scale regulations. Similar to existing residential neighborhoods in the vicinity, deep to light earth and natural tones would be utilized on building exteriors. Additionally, the project would incorporate elements such as bay windows, decorative panels, color accents, offsets, and framed openings to reduce visual bulk and scale. Building façades that have large expanses for flat wall panes would be avoided, and design elements such as recessed windows, pop-outs, bay windows, decorative trims, and other treatments would be incorporated to add visual interest to building façades. Therefore, the project would not result in bulk, scale, materials, or style which would be incompatible with surrounding development.

Lastly, as previously noted, aesthetic impacts of the proposed project, which is an infill residential project within a transit priority area, cannot be considered a significant impact under California Public Resources Code Section 21099. Potential aesthetic impacts associated with the proposed project were determined to be less than significant.

Master Response 3 Transportation, Parking, and Trails

The City received comments raising concern regarding the increase in traffic and congestion that would occur with implementation of the proposed project. Comments were also received raising concern over the vehicle miles traveled analysis, the project site being within a transit priority area, and the traffic significance determination of significant and unavoidable. This Master Response has been prepared to address those comments.

Transportation

As explained in **Master Response 2**, the project is located within a transit priority area due to its proximity to the Sabre Springs Transit Station, which is located approximately 0.5 mile south of Units 5 and 6 and is considered a major stop due to serving two bus routes with 15-minute frequencies on weekdays.

The project has been designed to implement the General Plan's Land Use and Mobility Elements and the Carmel Mountain Ranch Community Plan's Housing and Transportation Elements by providing higher-intensity multifamily housing on a vacant infill site centrally located near existing major employment centers, retail opportunities, recreational amenities, schools, the Carmel Mountain Ranch Library and the Sabre Springs Transit Station.

Pursuant to Public Resources Code Section 21099 (b)(2)), CEQA Guidelines Section 15064.3 and as described in EIR Section 5.2, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. Therefore, the evaluation of potential transportation/circulation impacts associated with the project reflects consistency with CEQA Guidelines Section 15064.3, which establishes vehicle miles traveled as the appropriate metric to evaluate transportation/circulation impacts.

The anticipated daily trip generation of the residential component of the project was determined per the City's Trip Generation Manual. The project is anticipated to generate approximately 8,282 daily trips. Pursuant to SB 743 (State CEQA Guidelines Section 15064.3), a vehicle miles traveled analysis, included in Appendix G to the Draft EIR, was prepared for the proposed project consistent with the methodology and significance criteria contained in the City's Transportation Study Manual (TSM). As discussed in Section 5.2, Transportation, of the Draft EIR, the census tracts encompassing the project site (170.56, 170.55, and 170.39) have a vehicle miles traveled ratio per capita of 21.7, 21.4, and 23.2, respectively. These values are between 112.6% to 122.1% of the City's vehicle miles traveled significance threshold of 16.2. While modeling the project in the San Diego Association of Governments (SANDAG) model would provide the project specific estimate of vehicle miles traveled per Capita, it can be inferred from the land use characteristics of the surrounding census tracts and their vehicle miles traveled rates, that it is unlikely the project would generate vehicle miles traveled per capita of 15% below the regional average, even with transportation demand management (TDM) reductions. Thus, impacts were determined to be significant and unavoidable (Impact TRA-1).

Although impacts were determined to be significant and unavoidable, the project would implement mitigation measure MM-TRA-1 to reduce vehicle miles traveled related impacts to the extent feasible. MM-TRA-1 would require the proposed project to implement vehicle miles traveled reduction measures in accordance with the City's Climate Action Plan Consistency Checklist and Mobility Choices Program (Section 5.2, Transportation, of the Draft EIR). With implementation of mitigation measure MM-TRA-1, the proposed project would reduce vehicle miles traveled and thus, transportation/circulation impacts associated with project-generated traffic. However, since the project would not be able to reduce VMT to below the City's threshold due to the land use characteristics of the project vicinity and surrounding census tracts, the project would continue to have a significant and unavoidable transportation/circulation impact.

Local Mobility Analysis

The Local Mobility Analysis (Draft EIR Appendix C) was performed per the City's TSM. Relevant pending projects in the study area that could be constructed and generating traffic in the study area by project's opening year were included in the Opening Year (2025) operations analysis scenarios. The project is not required to implement off-site intersection or roadway improvements to reduce CEQA transportation/circulation impacts; however, the project would include off-site intersection improvements to improve operations at intersections and roadways affected by the addition of project-related traffic (Draft EIR Appendix C). Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines and are included as part of the project as conditions of

approval. As detailed in Chapter 3, Project Description, right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. The project will install a traffic signal at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce queues that exceed available storage at the Ted Williams Parkway/Shoal Creek Drive intersection. These improvements will be required as part of the conditions of project approval; they are not mitigation measures. They are included in Chapter 3, Project Description, of the Draft EIR.

Parking

In accordance with Public Resources Code Section 21099(d), parking impacts of a residential project on an infill site within a transit priority area shall not be considered a significant impact on the environment. However, the project would provide adequate parking as required by San Diego Municipal Code Table 142-05C.

Trails

The City received comments pertaining to trails and whether they would be available to the public and Americans with Disabilities Act (ADA) compliant. The following Master Response has been prepared to provide a response to those comments.

Trails as a Public Amenity

The project will establish a publicly accessible trail system approximately 5 miles in length. The proposed trails have been designed to take advantage of the site's existing trail features that already circulate throughout the project site to provide mobility and recreational opportunities for pedestrians and bicyclists. A majority of the trail system would be repurposed from the previous golf path. There would also be new segments of the trail system that would be constructed of decomposed granite and would provide connections through new development areas. The trails, which range from 5 feet to 8 feet in width, will connect to sidewalks along the proposed on-site roadways and along existing adjacent residential streets to maximize access and connectivity. By retaining and reusing the former golf cart tunnels, the project will be able to establish a separate travel route for pedestrians and bicyclists who will be protected from high-speed traffic along several major roadways.

The proposed trails would encourage pedestrian activity and make the nearby existing major employment centers, retail opportunities, recreational amenities, schools, the Carmel Mountain Ranch Library, and the Sabre Springs Transit Station more accessible to current and future residents.

Additionally, the project will construct a trail staging/pedestrian rest area with bike racks, a multi-modal information kiosk, a bike repair station, picnic tables, and shade areas. Per the project's vehicle miles traveled analysis, the pedestrian rest area will be provided adjacent to the new public park within Unit 13. A trail staging area will be provided at Unit 4 adjacent to Chicarita Creek. The new trail system, all of which will be subject to a Recreation Easement to ensure permanent public access, will help implement the General Plan's Land Use, Mobility and Recreation Elements, as well as the Community Plan's Parks and Open Space and Transportation Elements (Table 5.1-2 and Table 5.1-3 of Section 5.1, Land Use, of the Draft EIR).

Accessibility

The 2019 California Building Code (CBC), CBC Section 11B-246.7, which discusses accessibility requirements for trails and nature walk areas, states that “[t]rails, paths and nature walk areas, or portions of them, shall be constructed with gradients permitting at least partial use by wheelchair occupants. Buildings and other functional areas shall be served by paths or walks with firm and stable surfaces.” The newly constructed sections of the proposed trail network would be constructed with a maximum five percent gradient to conform with the existing site slopes. Thus, the project would comply with the accessibility requirements of the CBC.

Master Response 4 Noise Impacts

The City received numerous comments regarding noise impacts due to construction, freeway traffic, and noise from proximity of new units to existing residential developments. This Master Response has been prepared to address those comments.

As discussed in Section 5.11, Noise, of the ~~Draft Final~~ EIR, the proposed project would result in two potentially significant noise related impacts. Given the fact that the project site is interspersed with and in proximity to existing residential land uses, construction activities associated with the proposed project could have the potential to exceed the City’s 75 A-weighted decibel (dBA) 12-hour average property line noise level threshold impacting existing adjacent homes and on-site residents once portions of the project are occupied. (Impact NOI-1). Additionally, noise levels associated with proposed heating, ventilation, and air conditioning (HVAC) equipment ~~would could~~ exceed the San Diego Municipal Code residential noise level standard of 40 dBA between 10:00 p.m. and 7:00 a.m. (Impact NOI-2).

The project would implement mitigation measures MM-NOI-1 and MM-NOI-2, to reduce the potentially significant noise related impacts to less than significant levels. MM-NOI-1 would require implementation of Construction Noise Reduction Techniques. Prior to issuance of demolition, grading, or building permits, Mitigation Monitoring Coordination shall verify that construction activity occurring as a result of proposed project implementation within 175 feet of noise-sensitive receivers includes noise-reduction measures to ensure construction activities do not exceed the 75 dBA community noise equivalent level (CNEL) and comply with City of San Diego Noise Standards. MM-NOI-2 would require implementation of Mechanical Equipment Noise Reduction Measures to ensure that mechanical noise levels are minimized to meet applicable City noise thresholds through equipment selection, project-site design, and construction of localized barriers or parapets.

As determined in Section 5.11, Noise, of the Draft EIR, the proposed project would not result in significant noise impacts related to traffic noise or groundborne vibration. With implementation of proposed construction and operational mitigation measures MM-NOI-1 and MM-NOI-2, the project would reduce all potentially significant noise impacts to less than significant levels. MM-NOI-3 was removed from the Final EIR because projects would be required to comply with the San Diego Municipal Code. Regulatory compliance precludes an impact from rising to a level of significance. Therefore, impacts associated with outdoor recreation activities and events would be less than significant, as revised in the Final EIR. Proposed recreational activity areas shall be located in a manner to minimize noise exposure at surrounding noise-sensitive receptors. Use of recreational areas adjacent to noise-sensitive receptors shall be limited to daytime hours (7:00 a.m. to 7:00 p.m.), with the exception of temporary use permits granted by the City Manager.

Master Response 5 Fire Safety and Emergency Evacuation

The City received numerous comments pertaining to wildfire hazards, emergency evacuation, and what would be done to prevent the spread of wildfires. This Master Response has been prepared to address those comments.

Wildfire is a continuous threat in Southern California and is particularly concerning in the wildland-urban interface, the geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. However, the project site is surrounded on all sides by residential neighborhoods and does not lie within the wildland-urban interface. Moreover, the property lies within San Diego Fire-Rescue Department (SDFRD) jurisdiction and is currently served by SDFRD. As shown in Draft EIR Figure 5.19-1, Very High Fire Hazard Severity Zones (Very High FHSZ), the southern portion of the project site (Assessor's Parcel Numbers 31303132, 31304062, 31370401, and 31303128) is designated as a Very High FHSZs (CAL FIRE 2009). The balance of the project site lies outside of the Very High FHSZ.

Brush Management

Since portions of the project site are located within the Very High FHSZ, a project-specific Brush Management Plan has been developed based on a Fire Fuel Load Modeling Report (Draft EIR Appendix D) and in coordination with SDFRD. Implementation of a Brush Management Plan would ensure compliance with General Plan Public Facilities Element Policies PF-D.12 through PF-D.15 regarding fire risk assessment and fire safe design. Brush management is also provided for the existing residential structures in redeveloped open space areas with no new buildings.

As noted in Chapter 3, Project Description, of the Draft EIR, the brush management zones provided for the project include a modified brush management zone approach. The brush management zone width may be modified based on existing conditions pursuant to San Diego Municipal Code Section 142.0412(i). The modified brush management zone approach includes an existing irrigated rear yard and or side yard Zone 1 condition area (minimum 10 feet in width) and Zone 2 area that varies in width. An extended protective brush thinning zone is proposed beyond riparian areas to serve as alternative compliance in accordance with San Diego Municipal Code Section 142.0412, the Landscape Standards of the Land Development Manual, and Fire Prevention Bureau Policy-18-01 and 08-1. Maintenance standards within the extended protective brush thinning zone would be the same as those required for the standard brush management zone 2 and allows for an additional 20 feet to 50 feet of brush management beyond the limits of City wetlands and the 5-foot-wide "no touch" zone.

The City's Landscape and Fire Review staff have reviewed and approved the project's Brush Management Plan. The project has been designed in accordance with the City's Landscape Regulations and the brush management zones (San Diego Municipal Code Section 142.0412) included within that plan are designed to work in tandem with the structural enhancements required by the City's adoption of the California Fire and Building Codes to minimize fire threat and provide suitable defensible space.

Fire Fuel Load Modeling Report

As stated in the Fire Fuel Load Modeling Report (Draft EIR Appendix D), the goal of the brush management zones provided for the project is to minimize the likelihood that a vegetation fire burns aggressively into riparian areas (source of largest fuels) and results in high intensity fire. This will provide the existing adjacent residential structures with the ability to survive a vegetation fire on this site with little intervention of firefighting forces. Preventing ignition to structures results in reduction of the exposure of firefighters and residents/visitors to hazards that threaten personal safety and will reduce property damage and losses. Mitigating ignition hazards and fire spread potential reduces the threat to structures and can help the fire department optimize the deployment of personnel and apparatus during a wildfire. The analysis in the Fire Fuel Load Modeling Report provides support and justifications for acceptance of a proposed brush management zone for this project based on the site-specific fire environment and varying ignition-resistance of the existing residential structures. As presented in the report, the alternative measures proposed for the proposed project's brush management zone supplement the standard requirements and provide at least functional equivalency. The application of the proposed brush management zones would reduce the duration, size, and intensity of a wildfire and create the separation between the existing homes and the adjacent fuels that is desired for structure protection and defensible space.

Wildfire Behavior and Structural Protection

Wildfires in San Diego predominantly occur where there is unmaintained, dry, and burnable vegetation. Referring to fire history maps in San Diego, wildfires that once occurred where open space was present, have not reoccurred since areas were urbanized because the consistent fuels no longer exist. The project area is urbanized and would not facilitate wildfire spread. Wildfire may occur in the distant open space preserves, but would not represent a direct threat to the project in terms of heat or flame impingement. Of the three preserves within approximately a half-mile of the project, only one, Twin Peaks, occurs to the north/northeast. This is important because the types of wildfires that result in evacuations occur during Red Flag Warning weather conditions, when humidity is low and winds out of the east/northeast are high. These Santa Ana wind conditions are the environmental factor that can facilitate fire spread, both through physically spreading flames from shrub to shrub, and from airborne embers or fire brands. Absent of these offshore winds, fire spread and ember production is drastically reduced, fire control success is high, and risk is low. Preserves that are south or west of the project present low risk because fires in these preserves would be driven to the west and south by Santa Ana winds, away from the project. A fire in the Twin Peaks preserve could generate embers that could reach the project area, but the landscapes would not support sustained burning before the embers burned out. Moreover, the project's structures will be required to meet the ignition resistant construction materials and methods detailed in Chapter 7A of the California Building Code. Similarly, the site's landscapes will be irrigated and maintained, resulting in ignition resistant surfaces that would not facilitate ember ignitions. The combination of these features results in ignition resistance throughout the project, which would not be likely to facilitate fire ignition or spread. The project's structures would also incorporate ember resistant vents to minimize the likelihood of ember penetration into attics or other spaces. The Twin Peaks preserve area is small in size and under extreme conditions (Red Flag Warning), would have a fast burn time, resulting in a short duration for fuel consumption and a finite period of ember production. This is important to the project and surrounding area because it minimizes the period where burning embers are produced and the resulting potential for structure or vegetation ignitions.

In summary, the project is not defined as a wildland urban interface project because it is situated within an area that is built out and converted to ignition-resistant landscapes. The small portion of the project that is within a ~~VHFHSZ~~ Very High FHSZ includes a riparian drainage and adjacent former golf course fairway. This area would not be built upon but would include brush management to protect existing and future residences as well as the riparian drainage from vegetation ignitions.

Evacuation

As stated in Draft EIR Section 5.19, Wildfire, the City is a participating entity in the Multi-Jurisdictional Hazard Mitigation Plan (MHMP) (County of San Diego 2017), which is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. The Emergency Operations Plan (County of San Diego 2018a) identifies a broad range of potential hazards and a response plan for public protection. The Emergency Operations Plan identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation. As part of the emergency response efforts, the City's Office of Homeland Security oversees emergency preparedness and response services for disaster-related measures, including administration of the City emergency operations center and alternate emergency operations center (City of San Diego 2017).

Subsequent to distribution of the ~~draft~~ Draft EIR, an Evacuation Plan was prepared for the proposed project (Final EIR Appendix D1). The San Diego Police Department (SDPD) is the lead agency for evacuation of areas within the City, including the project site and Carmel Mountain Ranch community. The SDPD, as part of a Unified Command, assesses and evaluates the need for evacuations, and orders evacuations according to established procedures. Additionally, as part of the Unified Command, the SDPD identifies available and appropriate evacuation routes and coordinates evacuation traffic management with the California Department of Transportation (Caltrans), the California Highway Patrol (CHP), the San Diego County Sheriff's Department (SDSD), other supporting agencies and jurisdictions. The decision to evacuate an area is not made lightly and there is a significant impact to public safety and the economy. The following process describes how emergency evacuation decisions are coordinated, allowing emergency managers and other supporting response organizations to make collaborative decisions.

As evidenced by mass evacuations during the 2007 Witch Creek Fire along with other San Diego County evacuations, even with roadways designed consistent with the City's Street Design Manual, it may not be possible, or even the best response to move large numbers of persons at the same time as part of a mass evacuation. Instead, informed, phased evacuations enable more streamlined evacuations where those at highest risk are moved first. Road infrastructure in San Diego County is not designed to accommodate a short-notice, mass evacuation without some level of congestion. The need for evacuation plans, pre-planning, and tiered or targeted and staggered evacuations becomes very important for improving evacuation effectiveness. Among the most important factors for successful evacuations in urban settings is control of intersections downstream of the evacuation area. If intersections are controlled by law enforcement, barricades, signal control, and other means, potential backups and slowed evacuations can be minimized. Multiple evacuation points enable more evacuees the ability to evacuate with less impact on roadways.

The project is located within an area that is subject to occasional wildfires, but based on the residential uses to the west, east, and north and open space areas to the south, and more distantly to the north, west and east, the wildfire potential within the project's direct sphere of influence is considered minimal and direct exposure to unmaintained fuels is limited. Similarly, fire intensity would be expected to be low in areas outside of nearby open space areas. Wildfires occurring under typical weather conditions

may result in fire that burns toward the project site and Carmel Mountain Ranch, but the surrounding terrain does not support aggressive runs because much of the community is separated from the open space by developed areas, and wildfires during typical weather conditions are less aggressive and more manageable. This reduced fire behavior would be expected to facilitate evacuations, as well as enable residents the potential action of on-site sheltering for properly constructed residences (those that include ignition resistant exteriors and ember protection, if considered safer than a short-notice evacuation. Moreover, early evacuation of the area may occur prior to actual threatening conditions at the project site, depending on conditions and fire spread projections.

Consistent with the County of San Diego Evacuation Planning Annex (2018), major ground transportation corridors in the area will be used as primary evacuation routes during an evacuation effort. The road systems were evaluated to determine the best routes for fire response equipment and “probable” evacuation routes for relocating people to designated safety areas. The primary roadways that would be used for evacuation from the project are:

- Ted Williams Parkway
- Carmel Mountain Road
- Rancho Carmel Drive
- Camino Del Norte

These roads provide access to urbanized areas and major traffic corridors including I-15 and State Route 56.

The combined population for the project (3,180 persons) and the Carmel Mountain Ranch community (29,149, including schools and commercial and industrial uses) would be 32,329 persons. During an evacuation, it is calculated that an average of 2 vehicles per household would evacuate along with vehicles from schools and commercial and industrial uses in a major incident that required full evacuation of the community. The evacuation travel time calculation is based on every residence evacuating two vehicles. This results in up to 10,078 vehicles generated from existing residential units and 2,400 vehicles from project units, totaling up to 12,478 vehicles. With the other area land uses, the total number of vehicles evacuating would be 23,499.

Based on the calculations performed in the Evacuation Plan, it was determined that the worst-case scenario would be 2.28 hours or 137 minutes of travel time to fully evacuate all studied populations. With the addition of the proposed project, there is an estimated increase in the calculated evacuation travel time of up to 15.6 minutes for all evacuation routes. The addition of under 16 minutes represents approximately a 10% potential increase in time for some evacuating residents under a worst-case scenario. The difference can be potentially offset by traffic management procedures and preparedness and is not considered significant based on comparisons to similar sized communities. The CEQA significance determination for evacuation is focused on whether a project would substantially impair an officially adopted emergency response plan or evacuation plan. The project’s evacuation would not substantially impair such a plan because the potential additional evacuation timeframe could be wholly or partially offset by a number of evacuation factors, including faster vehicle speed, fewer vehicles than modeled, and efficient traffic management. Further, ~~the area does not include a formally adopted emergency response plan or evacuation plan, but the City’s Emergency Operation Plan has been adopted and the provided project plan is consistent with informal evacuation plans and does not conflict with it, or~~ with standard evacuation procedures. This travel time calculation is based on the number of vehicles evacuating and the number of vehicles per hour that can be accommodated, which varies by road based on highway capacity data.

Specific to the project site, all private access roads would be constructed in accordance with San Diego Municipal Code Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. The site will include six access points (available to all, not limited to emergency access) to adjacent public streets to facilitate emergency response and evacuation as needed. As noted above, primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. For emergency evacuation, the Emergency Operations Plan identifies I-15 and State Route 56 as emergency evacuation routes in the vicinity of the project site. A County of San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all coordinating resources of San Diego cities and County. Additionally, the project is subject to review by the SDFRD as part of the City's review process and the ~~San Diego Police Department~~ SDPD is encouraged to provide input to ensure compliance with applicable safety standards. Therefore, as determined in Section 5.19, Wildfire, of the Draft EIR, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Evacuation Safety

Evacuation of the project population would not be an isolated event. An evacuation occurring within the Carmel Mountain Ranch area would potentially include a larger population of surrounding homes. Evacuation is not required in all instances, as other strategies may be employed if, for example, the Twin Peaks preserve were burning. Partial evacuations where those closest to the preserve are relocated may be the extent of the evacuation. However, for the sake of the project's Evacuation Plan, a conservative approach was employed as part of a consistent, cautious procedure that aims to understand the potential for a significant impact on the existing community's evacuations. The worst-case considered within the project's Evacuation Plan assumes: 1) all residents within the existing and project homes are at home, 2) all populations at the commercial, industrial and retail sites are present, and additional populations who shop in the area are present, 3) two elementary schools are in session, 4) the lowest road vehicle capacity on each evacuation route is considered the bottleneck and is the capacity used to calculate evacuation times, even though higher capacity roads would speed up evacuations, and 5) two vehicles from each home are evacuating the area. It is difficult to estimate the actual number of vehicles evacuating, so in an abundance of caution, these assumptions are utilized, even though it is likely a lower population would actually be evacuating, resulting in reduced evacuation times. Please refer to the project's Evacuation Plan (Final EIR Appendix D1, Section 4.1) for details regarding these and other assumptions.

The evacuation analysis indicates that under a worst-case condition, it could require up to 15.6 additional minutes over the current estimated time without the project for evacuation of the area, including the project's population. This is considered a less than significant increase in evacuation travel time, resulting in a determination of less than significant impact from a CEQA analytical perspective. Reasoning for the less than significant determination is as follows:

1. The additional 15.6 minutes can be substantially reduced or entirely offset with faster evacuation speeds (the analysis utilizes a conservative 4.8 mph for internal drives and up to 14.8 mph for the multi-lane roads).
2. The additional 15.6 minutes would be lower assuming a more typical population evacuating (e.g., some residents may already be out of the area at work, schools may not be in session, the shopping center may not be at maximum capacity, etc.).
3. The evacuation routes out of the area are "hardened" and protected corridors. No wind or terrain-

aligned exposures occur along the evacuation routes that would substantially impinge upon evacuation corridors. Evacuating from the Carmel Mountain Ranch area contrasts with Paradise in Northern California in that the Paradise evacuation required long travel through wildland fuels, and Carmel Mountain Ranch is urbanized and provides protected travel. Although it is possible that residents may sit in traffic that is not moving, sometimes for long periods of time, they would not be exposed to wildfire while evacuating Carmel Mountain Ranch. Law enforcement is moving traffic that is most vulnerable or exposed.

4. There are significant first responder resources within ~~San Diego Fire and Rescue Department~~ SDFRD and neighboring agencies that, during an evacuation event, would provide intersection control downstream of the event to maintain traffic movement.
5. Evacuations are no longer managed the way they were in the 2003 Cedar Fire or the 2007 Witch Creek Fire. In those fires, extremely large areas were evacuated at the same time. This caused widespread gridlock. However, it is important to remember that even with the type of mass-evacuation that occurred historically, the Carmel Mountain Ranch area evacuated with no loss of life. Technological investments and overall evacuation management improvements have resulted in a robust alert system that allows emergency managers to strategically evacuate smaller neighborhoods in a more surgical format to help smooth traffic surges and keep evacuations moving. An example is the 2017 Lilac Fire, which was a managed event where phased evacuations, by smaller areas, was implemented. This evacuation is considered a great success as large numbers of people were temporarily relocated safely along with several hundred horses that were moved out of the area.

Master Response 6 Public Services Related to School and Library

Schools

The City received comments pertaining to school capacity, overcrowding, and the need to build a new school due to impacts as a result of the proposed project. This Master Response has been prepared to address those comments.

The project site is located within the Poway Unified School District (PUSD) boundary. A comment received from PUSD requested a minor text edit be made within Section 5.14, Public Services and Facilities, of the Final EIR. The subject text has been revised to state: "There are two elementary schools, Shoal Creek Elementary School and Highland Ranch Elementary School, that would serve the project site. ~~Units 15 and 16, 16, and 17~~ of the project would fall within the school attendance boundary for Highland Ranch Elementary School. The project also lies within the school attendance boundaries for Meadowbrook Middle School and Rancho Bernardo High School (PUSD 2014)."

~~Section 15088.5 of the CEQA Guidelines provides the regulatory framework for when an EIR must be recirculated prior to certification. A recirculation of the Draft EIR would not be required, as no new significant information has been presented and added to the Draft EIR as a result of the public review period, such as a new significant environmental impacts or mitigation measures. The revisions to the Draft EIR, as included in the Final EIR, serve as clarification points to the EIR. No recirculation is required.~~

Table 5.14-5 of the Draft EIR indicates that the current estimated capacity in the PUSD is 2,205/4,646 (state loading/district loading). Table 5.14-6 of the Draft EIR shows the current capacity and enrollment numbers available for the public schools that serve the student-aged populations within the Carmel

Mountain Ranch community. Text edits have been made to the following text in Section 5.14, Public Services and Facilities of the Final EIR: “As shown in this table, available capacity exists at all of the schools listed, although, capacity at ~~Highland Ranch Elementary School~~ Shoal Creek Elementary School is minimal.” The current estimated capacity for Shoal Creek Elementary is 575/610 (state loading/district loading), 675/716 for Highland Ranch Elementary School, 1,458/1,496 for Meadowbrook Middle School, and 2,646/2,891 for Rancho Bernardo High School (Draft EIR Section 5.14-6).

Based on the proposed 1,200 multi-family dwelling units from the project, the proposed project is anticipated to generate approximately 193 elementary school students, 90 middle school students, and 121 high school students (see Table 5.14-7 in the Draft EIR). In total, the project anticipates 404 students would be added to the PUSD school system. As discussed earlier, the current estimated capacity in the PUSD is 2,205/4,646, the school district would be able to accommodate the anticipated 404 students resulting from implementation of the project. Additionally, the project would pay all applicable school fees to PUSD. The project would not cause overcrowding at nearby PUSD schools, and payment of all applicable school fees to PUSD, per Senate Bill 50, would mitigate the need to modify or construct any new schools.

Library

The City received comments regarding the project’s significant and unavoidable impact to library facilities. The following response addresses those comments.

The Draft EIR describes that the project would increase the use of library facilities and acknowledges that, in the existing baseline condition, the Carmel Mountain Ranch Library is smaller than 15,000 square feet, which is the recommended minimum size of a branch library pursuant to the City’s General Plan. However, the Draft EIR does not conclude that the project is causing the deficiency, is solely responsible for the existing size of the library, or will result in the need for immediate library expansion. Instead, the Draft EIR properly concludes that because the project will increase the demand for library services, the project will exacerbate the existing baseline deficiency at the Carmel Mountain Ranch Library. As there is no specific project in place to expand the size of the Carmel Mountain Ranch Library and there is no capital improvement program in existence to earmark funds for expanding the size of the Carmel Mountain Ranch Library, the Draft EIR ultimately concludes that impacts are significant and unavoidable. The project would provide an ad hoc fee, to be utilized by the City’s Library Department for a future project at the Carmel Mountain Ranch Library. As addressed in the Implementation Element of the Carmel Mountain Ranch Community Plan, all public facilities were “phased concurrent with development of the Ranch” and the developer assumed the obligation of financing and constructing all necessary public facilities (Implementation Element, page 105). As a result of this approach, there is no established fee program or Capital Improvement Program for future development to utilize in addressing additional facilities needs associated with new development. Given that no fee program exists, an ad hoc fee has been established to ensure the proposed project provides a fair share contribution to existing facilities (Leppert Engineering Corporation 2020). A condition of the project includes the requirement for payment of an ad hoc fee to address library facilities needs associated with increased population in the community. The permit condition will ensure a fair share contribution is provided with the project as a dedicated funding source to be used solely for improvements to the Carmel Mountain Ranch Library.

Physical impacts cannot be evaluated absent a project. Because no project has been identified, the physical impacts cannot be evaluated. There is no deferral of mitigation, because the Draft EIR identifies and discloses a significant and unavoidable impact and does not rely upon a (deferred) mitigation measure to reduce the impact to less than significant.

Master Response 7 Air Quality

Air Quality Concerns

The City received numerous comments pertaining to air quality impacts during construction of the proposed project. Comments received also requested that Valley Fever be analyzed within the EIR. This Master Response has been prepared to address those comments.

The proposed project would be subject to San Diego Air Pollution Control District (SDAPCD) Rule 55, Fugitive Dust Control. This rule requires that the applicant take steps to restrict visible emissions of fugitive dust beyond the property line. Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) generated during grading and construction activities. All active construction sites would be watered at least three times daily as a condition of project approval.

Draft EIR Table 5.3-6 shows the estimated maximum daily construction emissions associated with construction of the proposed project. Complete details of the emissions calculations are provided in Appendix A to Appendix H of the Draft EIR. As shown in Draft EIR Table 5.3-6, daily construction emissions would not exceed the significance thresholds for any criteria air pollutant. Particulate matter emissions would also not exceed 100 pounds per day.

As stated in Section 5.3.2, Regulatory Framework, SDAPCD Rule 1200 requires new or modified stationary source units with the potential to emit toxic air contaminants above rule threshold levels to either demonstrate that they will not increase the maximum incremental cancer risk above one in 1 million at every receptor location, demonstrate that toxics best available control technology will be employed if maximum incremental cancer risk is equal to or less than 10 in 1 million, or demonstrate compliance with the SDAPCD's protocol for those sources with an increase in maximum incremental cancer risk at any receptor location of greater than 10 in 1 million but less than 100 in 1 million (SDAPCD 2017a). Since the proposed project does not currently include stationary sources that would generate TACs above rule threshold levels, the rule does not apply. Furthermore, as shown in Tables 5.3-9 and 5.3-10, the health risk assessment prepared for the project showed cancer and non-cancer health risk results from project construction would be less than the SDAPCD significance threshold. Furthermore, a roadway health risk assessment was prepared to evaluate the impacts from toxic air contaminant emissions from I-15 on future residents of the project. That health risk assessment showed that future residents would not be subject to toxic air contaminant emissions that would exceed the SDAPCD thresholds for cancer and non-cancer health effects.

Valley Fever

The City received comments related to Valley Fever and specific requests that Valley Fever be analyzed in the EIR. The following response addresses those comments.

An EIR is required to identify and focus on the significant effects of a proposed project on the environment. Environment is defined as the "physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, noise, [and] objects of historic or aesthetic significance." Pub. Res. Code § 21060.5; *see also* CEQA Guidelines § 15360. As such, effects that are subject to review under CEQA must be related to a change to the physical environment. CEQA Guidelines § 15358(b). This is further outlined in CEQA Guidelines Section 15126.2, which states that in assessing impacts of a project on the environment, the lead agency is required to "limit its examination to changes in the existing physical conditions." Valley Fever is not a physical condition as defined in

Public Resources Code Section 21060.5 and is therefore outside the purview of CEQA.

Nevertheless, San Diego County is not considered a highly endemic region for Valley Fever. The latest report from the California Department of Public Health indicated that San Diego County has 4.4 cases per 100,000 people (California Department of Public Health 2017). Among the total reported incidents of Valley Fever from 2008 through 2017, only 0.9% of the cases reported in the County were in the project's zip code (92128) (County of San Diego 2018).

Master Response 8 Greenhouse Gas Concerns

The City received numerous comments regarding the increase in greenhouse gas emissions and the project's consistency with the City's Climate Action Plan checklist. This Master Response has been prepared to address those comments.

The City does not determine significance for purposes of CEQA by reviewing whether a project is consistent with each and every individual Climate Action Plan measure. Rather, the City relies solely on the Climate Action Plan Consistency Checklist to determine whether a project is consistent with the Climate Action Plan.

The City's Climate Action Plan Consistency Checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the Climate Action Plan are achieved. Implementation of these measures would ensure that new development is consistent with the Climate Action Plan's assumptions for relevant Climate Action Plan strategies developed to achieve the identified greenhouse gas emissions reduction targets. Projects that are consistent with the Climate Action Plan as determined through the use of this checklist may rely on the Climate Action Plan for the cumulative impact analysis of greenhouse gas emissions. Projects that are not consistent with the Climate Action Plan must prepare a comprehensive project-specific analysis of greenhouse gas emissions, including quantifying existing and projected greenhouse gas emissions and incorporating the measures in the checklist to the extent feasible. As the project is consistent with the Climate Action Plan, a project-specific analysis was not necessary. Cumulative greenhouse gas impacts would be significant for any project that is not consistent with the Climate Action Plan.

A Climate Action Plan Consistency Checklist (Draft EIR Appendix H) was completed for the project. As shown therein, the project is consistent with the City's Climate Action Plan. As a result, the project's emissions were considered to fall within the City's Climate Action Plan emission inventory and the project will not conflict with the City's ability to meet the greenhouse gas emissions reduction goals outlined within the Climate Action Plan. Based on the analysis provided in Draft EIR Section 5.7, Greenhouse Gas Emissions, the project would be consistent with the City's Climate Action Plan Consistency Checklist and would not conflict with any applicable plan, policy, or regulation for the purpose of reducing greenhouse gas emissions. As stated in Draft EIR Section 5.7, the project would implement the General Plan's City of Villages strategy in an identified transit priority area and increase the capacity for transit-supportive residential densities. Impacts were thus determined to be less than significant. The following is provided (consistent with Draft EIR Section 5.7.3) to show the projects consistency with the City's Climate Action Plan:

Step 1

The project site is designated Park, Open Space, and Recreation in the General Plan. The project site is currently designated as Private Recreation–Golf Course, as identified within the Community Plan Land Use Map. The project proposes a General Plan Amendment and Carmel Mountain Ranch Community Plan amendment, as well as a Rezone, which would permit increased intensity of use and allow for the

proposed residential development on site. The General Plan Amendment would redesignate the project site for Low-Medium Residential, Medium Residential, Open Space, and Commercial. The Community Plan Amendment would redesignate ~~10 of the 18 former golf course holes and the clubhouse site for residential use, commercial use, park and 8 of the 18 former golf course holes for open space.~~ The project site currently includes the following zoning:

- AR-1-1 (agricultural residential)
- RS-1-13 (residential single unit)
- RS-1-14 (residential single unit)
- RM-2-5 (residential multiple unit)
- RM-3-7 (residential multiple unit)
- The proposed project would include the following changes to the existing zoning:
- ~~12.01 acres from~~ AR-1-1 (agricultural-residential) to RM-1-1 (residential-multiple unit)
- ~~4.16 acres from~~ AR-1-1 (agricultural-residential) to RM-1-3 (residential-multiple unit)
- ~~10.07 acres from~~ AR-1-1 (agricultural-residential) to RM-2-4 (residential-multiple unit)
- ~~11.4 acres from~~ AR-1-1 (agricultural-residential) to RM-2-5 (residential-multiple unit)
- ~~5.58 acres from~~ AR-1-1 (agricultural-residential) to RM-2-6 (residential-multiple unit)
- ~~3.42 acres from~~ AR-1-1 (agricultural-residential) to RM-3-7 (residential-multiple unit)
- AR-1-1 (agricultural-residential) to OP (open space parks)
- AR-1-1 (agricultural-residential) to CC-2-1 (community commercial)
- ~~4.45 acres from~~ RS-1-14 (residential-single unit) to RM-2-5 (residential-multiple unit)
- ~~1.88 acres from~~ RS-1-14 (residential-single unit) to AR-1-1 (agricultural-residential)
- ~~0.41 acres from~~ RM-2-5 (residential-multiple unit) to AR-1-1 (agricultural-residential)
- ~~0.13 acres from~~ RM-3-7 (residential-multiple unit) to AR-1-1 (agricultural-residential)
- ~~5.55 acres from~~ RM-1-1 (residential-multiple unit) to AR-1-1 (agricultural-residential)

The project would not be consistent with the existing land use plan and zoning designations. However, the project would increase density within a transit priority area and, as shown below, would implement Climate Action Plan Strategy 3 actions, consistent with Step 3 of the Climate Action Plan Consistency Checklist. Therefore, the proposed project can respond “yes” to Step 1 of the Climate Action Plan Consistency Checklist under Option B.

Step 2

The second step of the Climate Action Plan consistency review is to review and evaluate a project’s consistency with the applicable strategies and actions of the Climate Action Plan. EIR Table 5.7-1 shows the proposed project’s consistency with each item within the Climate Action Plan Consistency Checklist.

EIR Table 5.7-1. Climate Action Plan Consistency Checklist

Climate Action Plan Consistency Checklist Item	Compliance
<p>1. Cool/Green Roofs:</p> <ul style="list-style-type: none"> • Would the project include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code (Attachment A)?; OR • Would the project roof construction have a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code?; OR • Would the project include a combination of the above two options? <p>Check "N/A" only if the project does not include a roof component.</p>	<p>Consistent.</p> <p>Residential and Non-Residential Buildings: The proposed project would include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than that provided in Table 1 of Attachment A of the Climate Action Plan Consistency Checklist.</p>
<p>2. Plumbing Fixtures and Fittings:</p> <p>With respect to plumbing fixtures or fittings provided as part of the project, would those low-flow fixtures/appliances be consistent with each of the following:</p> <p>Residential buildings:</p> <ul style="list-style-type: none"> • Kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi; • Standard dishwashers: 4.25 gallons per cycle; • Compact dishwashers: 3.5 gallons per cycle; and • Clothes washers: water factor of 6 gallons per cubic feet of drum capacity? <p>Nonresidential buildings:</p> <ul style="list-style-type: none"> • Plumbing fixtures and fittings that do not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the California Green Building Standards Code (See Attachment A); and • Appliances and fixtures for commercial applications that meet the provisions of Section A5.303.3 (voluntary measures) of the California Green Building Standards Code (See Attachment A)? <p>Check "N/A" only if the project does not include any plumbing fixtures or fittings.</p>	<p>Consistent.</p> <p>Residential Buildings:</p> <p>The project shall include low-flow fixtures and appliances consistent with the requirements of this checklist item.</p> <p>Non-Residential Buildings:</p> <p>The project shall include low-flow fixtures and appliances consistent with the requirements of this checklist item.</p>

EIR Table 5.7-1. Climate Action Plan Consistency Checklist

Climate Action Plan Consistency Checklist Item	Compliance
<p>3. Electric Vehicle Charging:</p> <ul style="list-style-type: none"> • Multiple-family projects of 17 dwelling units or less: Would 3% of the total parking spaces required, or a minimum of one space, whichever is greater, be provided with a listed cabinet, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations at such time as it is needed for use by residents? • Multiple-family projects of more than 17 dwelling units: Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents? • Non-residential projects: Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use? <p>Check "N/A" only if the project is a single-family project or would not require the provision of listed cabinets, boxes, or enclosures connected to a conduit linking the parking spaces with electrical service, e.g., projects requiring fewer than 10 parking spaces.</p>	<p>Consistent.</p> <p>Residential: The project will provide listed cabinets, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations, and at a minimum 3% of the spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents.</p> <p>Non-residential: The project will provide listed cabinets, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations, and at a minimum 50% of the spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents.</p>

EIR Table 5.7-1. Climate Action Plan Consistency Checklist

Climate Action Plan Consistency Checklist Item	Compliance
<p>4. Bicycle Parking Spaces:</p> <p>Would the project provide more short- and long-term bicycle parking spaces than required in the City's Municipal Code (Chapter 14, Article 2, Division 5)?</p> <p>Check "N/A" only if the project is a residential project.</p>	<p>Residential: N/A</p> <p>Non-residential: The City's Municipal Code requires at least two spaces or 0.1 per 1,000 square feet of building floor area. The non-residential square footage is 12,000, thus requiring two spaces. Therefore, the project would include at least two short-term bicycle parking spaces. The City's Municipal Code requires 5% of the required automobile parking spaces to be bicycle parking for any premises with more than ten full-time employees. The non-residential component has less than ten employees and therefore would have at least one long-term bicycle parking space.</p>
<p>5. Shower Facilities:</p> <p>If the project includes nonresidential development that would accommodate over 10 tenant occupants (employees), would the project include changing/shower facilities in accordance with the voluntary measures under the California Green Building Standards Code as shown in the table below?</p> <p>Check "N/A" only if the project is a residential project, or if it does not include nonresidential development that would accommodate over 10 tenant occupants (employees).</p>	<p>Residential: N/A</p> <p>Non-residential: The project has less than 10 tenant occupants but does include a shower in the art gallery/studio.</p>
<p>6. Designated Parking Spaces:</p> <p>If the project includes a nonresidential use in a TPA, would the project provide designated parking for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles in accordance with the following table?</p> <p>This measure does not cover electric vehicles. See Question 4 for electric vehicle parking requirements.</p> <p>Note: Vehicles bearing Clean Air Vehicle stickers from expired HOV lane programs may be considered eligible for designated parking spaces. The required designated parking spaces are to be provided within the overall minimum parking requirement, not in addition to it.</p> <p>Check "N/A" only if the project is a residential project, or if it does not include nonresidential use in a TPA.</p>	<p>Residential: N/A</p> <p>Non-residential: The project's non-residential component will have 21 parking spots and therefore would include 2 spaces as designated for low-emitting, fuel-efficient, and carpool/vanpool vehicles.</p>

EIR Table 5.7-1. Climate Action Plan Consistency Checklist

Climate Action Plan Consistency Checklist Item	Compliance
<p>7. Transportation Demand Management Program:</p> <p>If the project would accommodate over 50 tenant-occupants (employees), would it include a transportation demand management program that would be applicable to existing tenants and future tenants that includes:</p> <p>At least one of the following components:</p> <ul style="list-style-type: none"> • Parking cash out program • Parking management plan that includes charging employees market-rate for single-occupancy vehicle parking and providing reserved, discounted, or free spaces for registered carpools or vanpools • Unbundled parking whereby parking spaces would be leased or sold separately from the rental or purchase fees for the development for the life of the development <p>And at least three of the following components:</p> <ul style="list-style-type: none"> • Commitment to maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to tenants/employees • On-site carsharing vehicle(s) or bikesharing • Flexible or alternative work hours • Telework program • Transit, carpool, and vanpool subsidies • Pre-tax deduction for transit or vanpool fares and bicycle commute costs • Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, or childcare, either on site or within 1,320 feet (1/4 mile) of the structure/use? <p>Check "N/A" only if the project is a residential project or if it would not accommodate over 50 tenant-occupants (employees).</p>	<p>Not Applicable.</p> <p>The project does not accommodate over 50 tenant-occupants.</p>

Source: Appendix K.

Notes: N/A = not applicable; psi = pounds per square inch; EV = electric vehicle; TPA = Transit Priority Area; HOV = high-occupancy vehicle; SANDAG = San Diego Association of Governments.

As shown in EIR Table 5.7-1, the project would be consistent with all applicable greenhouse gas reduction strategies found within Step 2 of the Climate Action Plan Consistency Checklist.

Step 3

Lastly, as identified under Step 1 the project is proposing a land use and zoning designation amendment ~~and zoning designation amendment~~ amendment and rezone that would result in increased density within a transit priority area; therefore, the project would be required to implement the action strategies of Step 3 as outlined in the following discussion.

Climate Action Plan-1. Would the proposed project implement the General Plan's City of Villages strategy in an identified Transit Priority Area (TPA) that will result in an increase in the capacity for transit-supportive residential and/or employment densities?

Yes. Units 5 and 6 of the proposed project are located within a transit priority area; therefore, the entire project is considered to be within a transit priority area. The proposed project would result in an increase in residential density above what is currently zoned for the site. Because the proposed project would locate new residential units close to the San Diego Metropolitan Transit System (MTS) Sabre Springs/Peñasquitos Transit Station and an access point for the Interstate (I) 15 high-occupancy vehicle (HOV) lanes, the proposed project supports the General Plan's City of Villages strategy, including Policies LU-A.6 and LU-A.10, as it is an infill residential project. Further, the proposed project would include approximately 5 miles of trails that would allow residents to access the transit options close to the proposed project without using single-occupancy vehicles. The trails, ~~which would be completed in Phases I and II,~~ would allow residents to take advantage of the proximity to public transportation as a project design feature. Thus, the project would implement the General Plan's City of Villages strategy in an identified transit priority area and the development would result in an increase in the capacity for transit-supportive residential densities.

Climate Action Plan-2. Would the proposed project implement the General Plan's Mobility Element in Transit Priority Areas to increase the use of transit?

Yes. The proposed project would add medium-density residential units to an infill site located close (within 0.5 mile) to established transit (the MTS Sabre Springs/Peñasquitos Transit Station and an access point for the I-15 HOV lanes). The proposed project would include approximately 5 miles of trails that would allow residents to access the transit options close to the proposed project without using single-occupancy vehicles. The trails would be completed in Phases I and II to allow residents to take advantage of the proximity to public transportation as a project design feature. Thus, the proposed project would implement the General Plan's Mobility Element in a transit priority area to increase the use of transit.

Climate Action Plan-3. Would the proposed project implement pedestrian improvements in Transit Priority Areas to increase walking opportunities?

Yes. The proposed project would include approximately 5 miles of trails. The trail system would provide internal connections throughout the project site and, more importantly, connect residents to the neighborhoods, commercial developments, and transit stops surrounding the project site. The trails, which are designed for pedestrians and bicyclists, ~~would be completed in Phases I and II to~~ allow residents to take advantage of the proximity to public transportation as a project design feature. Thus, the proposed project would implement pedestrian improvements in transit priority areas to increase walking opportunities.

Climate Action Plan-4. Would the proposed project implement the City of San Diego's Bicycle Master Plan to increase bicycling opportunities?

Yes. The proposed project would include approximately 5 miles of trails. The trail system would provide internal connections throughout the project site and, more importantly, connect residents to the neighborhoods and commercial developments surrounding the project. The trail is designed for pedestrians and bicyclists and it would allow residents to access the transit options close to (within 0.5 mile) the proposed project without using single-occupancy vehicles. The trail network, ~~which would be~~

completed in Phase I, would allow residents to take advantage of the proximity to public transportation as a project design feature. The site is unique in that it consists of 18 separate development areas (11 of which are proposed for residential and community commercial development), creating linkages through the site to key destination areas. In total, the proposed project would have 6 access points throughout the 164.5-acre site connecting to various roadways in the community. Trails would connect to sidewalks along the proposed on-site roadways and along existing adjacent residential streets to maximize access and connectivity. Traffic calming measures and low speed designs would be used in the design of on-site roadways, with “shared roadway” markings identifying that bicycle use is permitted. Trail staging areas would be constructed on site to provide bike racks, a trail map kiosk, bike station, picnic tables, and shade areas. Thus, the proposed project would implement the City’s Bicycle Master Plan to increase bicycling opportunities.

Climate Action Plan-5. Would the proposed project incorporate implementation mechanisms that support Transit Oriented Development?

Yes. The proposed project would add medium-density residential units to an infill site located close to (within 0.5 mile) established transit (the MTS Sabre Springs/Peñasquitos Transit Station and access to the I-15 HOV lanes). The residents of the proposed project would be able to take advantage of established transit opportunities without having to use a single-occupancy vehicle. The proposed project is residential, so it would not directly create jobs, but there would be jobs needed to fulfill the maintenance, landscaping, and repair of the development, including the new open space and park areas. The proposed project would create jobs during the construction phase and residents would be close to employment opportunities nearby, including the Rancho Bernardo and Rancho Peñasquitos employment centers. The Rancho Bernardo and Rancho Peñasquitos employment centers are located directly to the north and southwest of the project area and are estimated to contain 16,542 and 8,861 employees, respectively (SANDAG 2019a, 2019b). The proposed project would create a trail system that would provide internal connections throughout the project site and, more importantly, connect residents to the neighborhoods and commercial developments surrounding the project. The trail is designed for pedestrians and bicyclists. The site is unique in that it consists of 18 separate development areas (11 of which are proposed for residential and community commercial development), creating linkages through the site to key destination areas. In total, the proposed project has 6 access points throughout the 164.5-acre site connecting to various roadways in the community. Trails would connect to sidewalks along the proposed on-site roadways and along existing adjacent residential streets to maximize access and connectivity. Traffic calming measures and low speed designs would be used in the design of on-site roadways, with “shared roadway” markings identifying that bicycle use is permitted. Thus, the proposed project would incorporate implementation mechanisms that support Transit Oriented Development.

Climate Action Plan-6. Would the proposed project implement the Urban Forest Management Plan to increase urban tree canopy coverage?

Yes. The project would include large shade/specimen, shade, street, and accent trees. There would be a minimum of four tree species included as part of the development from each category listed. The project would incorporate tree planting that would result in 29% coverage of the project site, which would contribute toward the City’s 35% urban tree canopy coverage goal by 2035. In addition, the project also aims to preserve existing trees that are outside the limits of grading, and the applicant has prepared a landscape plan that identifies existing trees to remain. In total, the project would involve planting 363 new trees and keeping 1,521 existing trees. Thus, the project would implement the Urban Forest Management Plan to increase the City’s urban tree canopy coverage.

Master Response 9 Population and Housing

The City received numerous comments regarding the population growth anticipated with the project and a related inconsistency with the City's 2013 General Plan Housing Element. This Master Response has been prepared to address those comments.

The Draft EIR determined that the increase in population as a result of the proposed project (3,180 people based on a population coefficient of 2.65 and 1,200 units [SANDAG 2013c]), would result in a significant and unavoidable impact because the project was not consistent with the City's General Plan 2013 Housing Element (City of San Diego 2013). After the 2013 Housing Element was adopted, the golf course ceased operation in 2018.

The City's current Housing Element, which was approved by the City Council on June 16, 2020, identifies a majority of the project site within its housing sites inventories analysis, reflecting the closure of the golf course and allocating approximately 1,200–1,245 potential units to the project site (City of San Diego 2020), which is consistent with the proposed project. Therefore, the Final EIR has been revised to indicate the inclusion of the project site in the recently adopted Housing Element. The description of potential impacts provided in Section 5.13, Population and Housing, has been revised to reflect the inclusion of the project site in the recently adopted Housing Element. Specifically, the Final EIR now concludes that the project will result in a less than significant impact related to population and housing. Cumulative population and housing impacts in Chapter 6 of the Final EIR also have been revised from significant and unavoidable to less than significant. A recirculation of the Draft EIR would not be required, as no new significant information has been presented and added to the Draft EIR as a result of comments received during the public review period, such as a new significant environmental impacts or mitigation measures. The revisions to the Draft EIR, as included in the Final EIR, serve as clarification points to the EIR. No recirculation is required.

Master Response 10 Alternatives

The City received comments related to the alternatives analysis included in the Draft EIR. Comments raised asked for different alternatives to be analyzed. This Master Response has been prepared to address those comments.

Consistent with CEQA Guidelines Section 15126.6, the Draft EIR considers and discusses multiple alternatives to the project. As required pursuant to CEQA Guidelines Section 15126.6(a), these alternatives were selected to provide a reasonable range of possible project designs that could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project. Furthermore, CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered by the lead agency, but were rejected as infeasible. Chapter 8 therefore provides a discussion of the alternatives considered but rejected. Factors that may be used to eliminate alternatives from detailed consideration in an EIR include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental effects. The Draft EIR assessed the potential to include an off-site location alternative and a single-family housing alternative; however, both options were rejected. The alternative location was rejected because there are no other locations controlled by the applicant that would allow for such a development in the area that would meet the project objectives.

As stated in CEQA Guidelines Section 15126.6(f), the selection of alternatives is governed by a “rule of reason” that requires an EIR to evaluate only those alternatives necessary to permit a reasoned choice. As discussed in Chapter 8 of the Draft EIR, the alternatives included in the analysis were developed in the course of project planning, environmental review, and public input. The alternatives chosen for analysis within the Draft EIR provide a range of reasonable alternative development scenarios that would avoid or substantially lessen environmental impacts as required by law. Thus, no further alternative scenarios are required to be presented and/or analyzed.

Many comment letters requested a different alternative than the ones included in the Draft EIR. The most common request was an alternative that included 200 single-family residences. The Draft EIR explained in Section 8.4 that, a Single-Family Housing Alternative was considered but categorized as rejected because the alternative would not reduce the project's significant and unavoidable impacts and because the larger footprint required for this alternative would result in greater impacts to biological resources, historical resources, and tribal cultural resources.

The Single-Family Housing Alternative would reduce potentially significant impacts related to transportation/circulation, air quality, greenhouse gases, energy, noise, and public services and facilities since the alternative would build fewer residential units and introduce a smaller population increase; however, this alternative would still result in significant and unmitigated transportation/circulation and public services and facilities (library) impacts and it would result in some increase in air quality, greenhouse gas emissions, energy and noise. The significant and unmitigated transportation/circulation and library impacts would not be reduced under this alternative because any development on the project site would still generate an increase in vehicle miles traveled in an area where impacts cannot be fully mitigated by transportation demand management measures. Additionally, the existing library deficiency would be further exacerbated by the population increase. Any development on the site would likewise contribute to construction and operational air quality impacts, greenhouse gas emissions, noise, and energy impacts.

Moreover, the Single-Family Housing Alternative would ultimately result in greater impacts to biological resources, historical resources, and tribal cultural resources, due to the increase in development footprint that would be required under this scenario to accommodate 200 new single-family homes across the project site.

There would be fewer deed restricted affordable housing units under this alternative. The Single-Family Housing Alternative would be required to comply with the City's Inclusionary Housing requirements; however, this alternative would only be required to provide 20 affordable dwelling units on site. The alternative would not be consistent with the General Plan's Housing Element and not assist the City in meeting its current Regional Housing Needs Assessment allocation to the same extent as the proposed project. The Single-Family Housing Alternative would therefore be inconsistent with a number of other goals and policies related to affordable housing in the General Plan and Community Plan, including General Plan Goal H—Balanced Communities and Equitable Development; which is in place to ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.

This alternative would not achieve Objective No. 1, of providing multi-family housing units within a range or housing types that would be compatible with adjacent established residential communities. In addition, this alternative would not meet Objective No. 2, aid the City in meeting state and local housing goals, to the same extent as the proposed project. This alternative would also not achieve Objective No. 3 of preserving a majority of the project site as open space and avoiding areas of native vegetation. For these reasons, this alternative was rejected.

As stated in Chapter 8, Alternatives, and shown in Table 8-1, the No Project/No Development Alternative would have the least impacts. Under this alternative, however, none of the project objectives would be met. As identified in Section 15126.6(e)(2) of the CEQA Guidelines “if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Thus, the environmentally superior alternative, as identified in the analysis in Chapter 8, would be the Reduced Density Alternative (825 multi-family units). However, Reduced Density alternative would not avoid the project’s significant and unavoidable impacts to transportation/circulation, or public services and facilities (libraries), because this alternative would still generate an increase in vehicle miles traveled in an area where impacts cannot be fully mitigated by transportation demand management measures. Additionally, the existing library deficiency would be further exacerbated by the population increase.

The following issue areas that would be less than significant with or without mitigation under the proposed project, would be slightly reduced under the Reduced Density Alternative: air quality, energy, greenhouse gas emissions, noise, transportation/circulation, public utilities, public services and facilities, population and housing, and visual effects and neighborhood character. Although this alternative may result in slightly reduced impacts the proposed project also results in less than significant impacts with or without mitigation. This alternative would also meet most of the project objectives.

In summary, the EIR includes a reasonable range of alternative and need not address every conceivable alternative (CEQA Section 15126(a)). Alternatives were chosen for the EIR analysis based on their ability to avoid or lessen impacts of the project and meet most of the project objectives. Ultimately, pursuant to CEQA Guidelines Sections 15091 and 15093, the City Council will need to adopt Findings and a Statement of Overriding Considerations if it decides to approve or deny the project or any of the alternatives, or combination thereof.

Comment Letter S1

State Agencies

Response to Comment Letter S1

1 Caltrans

February 5, 2021

S1-1

The City acknowledges the comment as an introduction to comments that follow.

S1-2

The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

February 5, 2021

11-SD-15
PM 20:99

The Trails at Carmel Mountain Ranch
DEIR/SCH# 2020039006

Ms. Elizabeth Shearer Nguyen
Environmental Planner
City of San Diego
Department Services
1222 First Avenue, MS-501
San Diego, CA 92101

Dear Ms. Shearer-Nguyen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Draft Environmental Impact Report (DEIR) State Clearinghouse (SCH) #2020039006 for The Trails at Carmel Mountain Ranch project located near Interstate 15 (I-15) and Carmel Mountain Road in the city of San Diego. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans has the following comments:

Environmental

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' Right-of-Way (R/W) through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the DEIR that Caltrans will use for our subsequent environmental compliance.

S1-1

S1-2

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Ms. Elizabeth Shearer Nguyen
February 5, 2021
Page 2

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the DEIR.

Traffic Impact Study

Traffic Engineering and Analysis Branch has received the DEIR and Local Mobility Analysis (LMA) for review and found the following comments.

1. No comments on the LMA proposed intersection improvements identified since they are outside of Caltrans R/W.
2. Page 15, Study Scenarios section should include Existing + Project scenario so direct impacts can be shown.
3. Figure 4: Existing Lane Configuration comments:
Intersection 9 needs to be corrected since it is showing a two-lane loop ramp, when it is a single lane on-ramp. Update Synchro to reflect this movement as it may impact traffic modeling.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

S1-3

S1-4

S1-5

S1-6

S1-7

S1-8

S1-3

The project does not propose any work within Caltrans right-of-way. Thus, an encroachment permit from Caltrans is not expected to be required.

S1-4

Potential environmental impacts are addressed throughout Chapter 5 of the Draft EIR. Transportation/circulation-related impacts (including transportation/circulation infrastructure, such as roadways and on/off ramps to surrounding highways) were included in Section 5.2, Transportation, of the Draft EIR.

S1-5

The comment is an introduction to comments that follow.

S1-6

Comment noted. Because the comment does not raise an issue with the adequacy of the environmental impact analysis, no further transportation/circulation-related response is required.

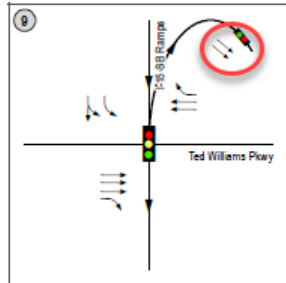
S1-7

The City's TSM does not require the analysis of an Existing Plus Project scenario in the Local Mobility Analysis (LMA) and the scenario is not needed for determining environmental impacts related to transportation/circulation, because transportation/circulation impacts are analyzed using the vehicle miles traveled metric discussed in Master Response 3. The Opening Year 2025 Plus Project scenario determines the project's direct transportation/circulation impacts. Therefore, no revisions to the Draft EIR are required.

S1-8

The number of vehicle-receiving lanes at Intersection 9, as shown in Figure 4 of the Local Mobility Analysis, are coded correctly in the analysis. The figure as drawn depicts the number of ramp lanes further downstream at the ramp meter. No change to the analysis or figure is needed.

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Page 3



4. This developments' vehicle miles traveled (VMT) analysis shows the proposed development VMT/Capita is 21.7, 21.4, and 23.2. "The expected Project VMT/Capita is 32-43% above the VMT significance threshold of 16.2."

- a. This should not be "significant and unavoidable" since the development can be reduced to meet the VMT thresholds.
- b. We recommend this development be revised to reduce the number of VMT to conform with the Governor's Office of Planning and Research guidance regarding VMT. Caltrans references the Governor's Office of Planning and Research (OPR) Senate Bill 743 based **Technical Advisory on Evaluating Transportation Impacts in CEQA** (December 2018) for guidance on the development of VMT based Transportation Impact Studies. Caltrans recommends use of OPR's significance thresholds for determination of transportation impacts from land use projects. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* is available online at <http://opr.ca.gov/ceqa/updates/sb-743/>.

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S1-9

The project is at 112.6% to 122.1% of regional average vehicle miles traveled per capita; currently available mitigation measures would not reduce project vehicle miles traveled per capita to 85% of regional average; therefore, the impacts are identified as significant and not fully mitigated. Refer to **Master Response 3** for more information.

S1-10

The City's thresholds for transportation/circulation impacts were adopted by the City Council as part of the Complete Communities: Mobility Choices program on November 9, 2020. Lead Agencies are encouraged in the State CEQA Guidelines to develop and formally adopt their own thresholds of significance (CEQA Guidelines Section 15064.7(b)). Thresholds established for general use by a lead agency must be adopted by ordinance, resolution, rule, or regulation; be subjected to public review; and be supported by substantial evidence (CEQA Guidelines Section 15064.7(b)). The City followed all requirements when the Mobility Choices program was approved.

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Page 4

Hydrology

- Provide the Drainage Study referred to at Page 96 of Appendix S - Storm Quality Management Plan Part 2.
- Provide drainage maps showing pre and post development Q, drainage configuration and runoff direction.

Right-of-Way

Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <http://www.dot.ca.gov/trafficops/ep/index.html>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Mark McCumsey at (619) 985-4957 or by email at mark.mccumsey@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch

S1-11

S1-11

The Drainage Report prepared for the project, which was included as Appendix E to the Draft EIR, was made available to Caltrans for review during the public comment period for the Draft EIR.

S1-12

Comment noted. The comment does not raise an issue with the analysis provided within the Draft EIR.

S1-12

S1-13

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

S1-13

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Comment Letter S2

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State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 8, 2021

Elizabeth Sheerer-Nguyen
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@sandiego.gov

Subject: City of San Diego Trails at Carmel Mountain Ranch Project #652519
(PROJECT) Draft Environmental Impact Report (DEIR), SCH #2020039006

Dear Ms. Sheerer-Nguyen:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from The City of San Diego (CITY) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously submitted comments in response to the Notice of Preparation of the DEIR on April 1, 2020.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

S2-1

The comment is an introduction to the comments that follow.

S2-2

The comment provides background information pertaining to the role the California Department of Fish and Wildlife (CDFW) plays as a Trustee Agency and Responsible Agency under CEQA.

S2-1

S2-2

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CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP program by implementing its approved City Multiple Species Conservation Program (MSCP) through implementation of the City of San Diego MSCP Subarea Plan (SAP). The Multi-Habitat Preserve Area (MHPA) is the area from which a final hard-line reserve becomes established to adequately conserve covered species pursuant to the SAP.

PROJECT DESCRIPTION SUMMARY

Proponent: NUW12-CMR, LLC

Objective: The objective of the Project is a General Plan Amendment is to allow redevelopment of the existing 18-hole golf course at Carmel Mountain Ranch to 1,200 multi-family residential units with a mix of open space and recreational areas. The Project would also construct various site improvements, including associated hardscape, landscaping, infrastructure (e.g., off-site utility connections of water, sewer), storm drain, and access. Various recreational amenities would be provided, as well as a publicly accessible multi-use trail system that would circulate throughout the Project site. Most of the trail system will be comprised of decomposed granite or compacted earth trails, with some concrete trails that would be repurposed from the previous golf cart path. There are five pedestrian bridges that cross over Chicarita Creek and other wetland areas; unspecified repairs may be conducted on one of the bridges, and any new bridge footings are proposed to span the creek.

Location: The Trails at Carmel Mountain Ranch is located at 14050 Carmel Ridge Road in the northeastern part of the City. The Project area is directly east of Interstate 15 and lies north of Ted Williams Parkway and south of Carmel Mountain Road. The Project is located within the Northern Area of the SAP. MHPA is located approximately 1,000 feet to the south of the Project, and to the east of Interstate (I)-15.

Biological Setting: According to the DEIR, a total of 13 vegetation communities were identified on the Project site: coastal sage scrub, coastal sage scrub (disturbed), coastal sage scrub (*Baccharis*-dominated), coastal and valley freshwater marsh, disturbed wetland, eucalyptus woodland, southern arroyo willow riparian forest, southern coast live oak riparian forest, southern cottonwood-willow riparian forest, southern sycamore-alder riparian woodland, southern willow scrub (disturbed), southern willow scrub, and undifferentiated open woodland.

Special status wildlife species identified on site include coastal California gnatcatcher (*Polioptila californica californica*; Federal Endangered Species Act (FESA)-listed threatened, MSCP Covered Species). Special status species with high to moderate potential to occur include least Bell's vireo (*Vireo bellii pusillus*; CESA- and FESA-listed, MSCP Covered Species), Cooper's hawk (*Accipiter cooperii*; MSCP Covered Species), yellow warbler (*Setophaga petechia*), San Diego desert woodrat (*Neotoma lepida intermedia*), orange-throated whiptail (*Aspidoscelis hyperythra*; MSCP Covered Species), San Diego or coast horned lizard (*Phrynosoma blainvillii*; California Species of Special Concern (SSC), MSCP Covered Species), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*; California Species of Special Concern (SSC)). Rare plants with potential to be found on site include Coulter's saltbush (*Atriplex coulteri*; California Native Plant Society (CNPS) Rare Plant Rank 1B.2), variegated dudleya (*Dudleya variegata*; CNPS Rare Plant Rank 1B.2, MSCP Narrow Endemic Species) and San Diego barrel cactus (*Ferocactus viridescens*; CNPS Rare Plant Rank 2B.1, MSCP Covered Species).

S2-3

The comment restates information contained in the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. To clarify, the project requires a General Plan Amendment, Community Plan Amendment, Rezone, Vesting Tentative Map, Master Planned Development Plan, Site Development Permit, and Easement Vacation, all of which are discussed in Chapter 3 of the Draft EIR.

S2-2
Cont.

S2-4

The comment restates information contained in the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR

S2-3

S2-4

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California adolphia (*Adolphia californica*; CNPS Rare Plant Rank 2B.1), also has a high potential to be on site within native habitat areas, due to previously identified occurrences on site.

The Project does not propose direct impacts to MCSP-designated sensitive habitats, including wetlands. Golf course greens and other temporary project impact areas will be revegetated; no compensatory mitigation is proposed.

Timeframe: A timeframe was not provided for the Project.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

I. MSCP Covered Species

COMMENT #1:

Lack of Inclusion of Least Bell's Vireo Measure in Mitigation and Monitoring and Reporting Program (MMRP).

Section: 5.4 Biological Resources, 10 MMRP, Page: 5.4-23

Issue: The DEIR identifies a mitigation measure, *Biological Resources – least Bell's vireo (State Endangered/Federally Protected)*, to protect least Bell's vireo from indirect impacts resulting from construction. Part of the measure was not included in Section 10 of the DEIR (MMRP) or Executive Summary.

Specific impacts: The DEIR identifies a moderate potential for least Bell's vireo to be present in riparian habitat adjacent to Project impacts, and identifies a detailed measure in the impact analysis, but fails to include the measure in the MMRP. The MMRP is the primary document which will be used during construction to confirm compliance with Project mitigation measures.

Why impact would occur: Without inclusion of the appropriate mitigation measure in the MMRP, indirect impacts to least Bell's vireo may occur.

Evidence impact would be significant: As identified in Section 5.4.3 of the DEIR, impacts to FESA-listed, CESA-listed, and MSCP-covered species would be considered significant without mitigation. The DEIR does not include the full mitigation measure identified in the impact analysis in the MMRP. The MMRP describes all the required measures for the Project and identifies the responsible party for compliance. Without inclusion of the measure in the MMRP, the measure may not be implemented during construction. Potentially significant impacts may occur if the full mitigation measure is not implemented during construction.

↑
S4-4
Cont.

S2-5

S2-6
↓

S2-5

The comment is an introduction to comments that follow.

S2-6

Section 5.4, Biological Resources, of the Draft EIR identifies the least Bell's vireo mitigation measure that was inadvertently omitted from the Executive Summary of the Draft EIR. The Final EIR has been revised to include mitigation measure MM-BIO-1 within Chapter 1 and the Executive Summary.

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Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure # CDFW-BIO-1:

Please include the full mitigation measure described in Section 5.4 in the MMRP and Executive Summary.

To reduce impacts to less than significant: Prior to the issuance of any grading permit, the City Manager (or appointed designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the least Bell's vireo, until the following requirements have been met to the satisfaction of the City Manager:

A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [dBA] hourly average for the presence of the least Bell's vireo. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction.

- a. If the least Bell's vireo is present, then the following conditions must be met:
 - I. Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and
 - II. Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied least Bell's vireo habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the city manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or
 - III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16). Construction noise monitoring shall continue to be monitored at least twice weekly on

S2-6
Cont.

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varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- b. If least Bell's vireo is not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:
 - I. If this evidence indicates the potential is high for least bell's vireo to be present based on historical records or site conditions, then condition a. III shall be adhered to as specified above.
 - II. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

II. Project Description and Related Impact Shortcomings

Potential Impacts to Sensitive Habitat

COMMENT #2:

Section: DEIR 3-Project Description, Figure 5.4-1E, 5.4.3 Impact Analysis, Biological Technical Report (BTR) Attachment E Photo 9, Page: 3-7, 5.4-17, 5.4-25

Issue: The DEIR notes that bridge repair would occur on one of the bridges, but details of this repair or new construction were not included in sufficient detail in the DEIR to determine if substantial adverse impacts to the bed, bank, and channel of Chicarita Creek would be avoided. This and other building-related encroachments into MSCP-protected native habitat may require a Lake or Streambed Alteration (LSA) Agreement and/or additional mitigation.

Specific impact: The Project DEIR does not propose direct impacts to protected/covered native habitat, including wetlands; however, some Project features, such as bridge repair and maintenance/ construction of one of the building units may impact and the bed, bank, and channel as regulated under Section 1600 *et seq* of the Fish and Game Code. The Draft EIR does not propose Notification to CDFW for potential streambed impacts, or other MSCP-prescribed avoidance, minimization, and mitigation measures for these potentially significant impacts.

Why impact would occur: The DEIR states,

No wetland impacts are anticipated from the five pedestrian bridges/cart paths that cross over Chicarita Creek. One of the bridges, located in the southern portion of Chicarita Creek, has partially collapsed. The collapsed bridge segments in Chicarita Creek will remain undisturbed. Repair, removal, and replacement of damaged portions of the bridge will occur entirely outside of jurisdictional resources to ensure no impacts to the creek. Any new

S2-7

The project has been revised to remove all portions of the trail network from Environmentally Sensitive Land (ESL) and ESL buffers. As such, no Chicarita Creek bridge repair or trail repair/maintenance activities will occur in those areas, and no direct or indirect impacts to sensitive biological resources would occur-. The project does not result in impacts to jurisdictional resources, therefore a Lake or Streambed Alteration Agreement is not ~~be~~ required. The prohibition on trail segments in ESL and ESL buffers will be enforced via a condition of approval.

S2-6
Cont.

S2-8

Refer to **Response to Comment S2-7**. The DEIR does not propose Notification to CDFW or mitigation measures because no streambed impacts are anticipated.

S2-7

S2-9

The comment restates information contained in the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

S2-8

S2-9

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bridge construction would span the creek with bridge footings placed outside of the creek to avoid impacts to jurisdictional resources. Thus, the project proposes no disturbance to jurisdictional resources regulated by the ACOE, RWQCB, CDFW or City.

Although the Project proposes to replace the bridge outside of wetland habitats and the creek, impacts to adjacent native habitat from bridge repair may occur depending on the location and type of repair. The specific location of the bridge repair work was not identified in the DEIR or BTR. The BTR Attachment E: Jurisdictional Delineation Report Photo 9 depicts a section of wetland surrounding a section of pedestrian bridge, with native upland habitat adjacent. It is unclear if all native habitat within the riparian buffer would be avoided by bridge/path maintenance and repair. If native habitat may be impacted by these activities, it should be identified as part of the limits of disturbance.

Also, Figure 5.4-1E of the DEIR shows the limits of disturbance of Unit 2, Lot 1 within 3 feet of the creek. It is unclear from the DEIR, how the Project proposes to avoid this resource with the limits of disturbance within 3 feet.

Evidence impact would be significant: As noted in Section 5.4.3 of the DEIR, impacts to native habitats would be significant without mitigation. Impacts to native habitat may potentially occur from path and bridge repair, or other Project features. Analysis and potential mitigation were not provided for these impacts.

CDFW requires providing written Notification to the Department pursuant to Section 1600 *et seq.* of the Fish and Game Code for any activities in streams that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any stream. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Appropriate avoidance, minimization, or mitigation measures will be determined through the LSAA process and may include but are not limited to silt fencing, work period restrictions, and other species-specific measures.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Mitigation Measure # CDFW-BIO-2a:

To reduce impacts to less than significant: Specific detail on bridge repair shall be provided in the Final EIR. Bridges that require repair and/or replacement, as well as the resulting potential impact areas, shall be identified. Sensitive habitat impacts on shall be mapped and the figures provided in the Final EIR.

Mitigation Measure # CDFW-BIO-2b

To reduce impacts to less than significant: If the specific detail on bridge repair provided in the Final EIR reveals that project activities may significantly alter the bed, bank, or channel of Chicarita Creek, a Notification shall be submitted to CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. CDFW shall be consulted prior to submittal if it is unclear as to whether substantial impacts to LSA-jurisdictional resources may occur.

S2-10

Refer to **Response to Comment S2-7**.

S2-11

The toe of slope for grading associated with the water quality basin is located approximately 8 feet above the stream channel. The project engineers have determined that that grading at this location would not result in impacts to the delineated feature. To ensure that unintentional impacts do not occur during construction, Mitigation measure MM-BIO-1(I.F) requires flagging of all resources and construction monitoring.

S2-12

As discussed in Section 5.4, Biological Resources, of the Draft EIR, the Draft EIR determined that the proposed project would not have any permanent or temporary direct impacts to native vegetation communities, including any sensitive vegetation communities or special status plant species.

S2-13

Refer to **Response to Comment S2-7** and **S2-8**.

S2-14

Refer to **Response to Comments S2-7** through **S2-13**. As disclosed in Section 5.4, Biological Resources, the project would not result in impacts to any sensitive habitats that would require mitigation in accordance with the Biology Guidelines.

↑ S2-9
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S2-10

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Mitigation Measure # CDFW-BIO-2c

To reduce impacts to less than significant: If the specific detail on bridge repair provided in the Final EIR reveals that project activities may impact any MSCP-covered habitats, impacts will be mitigated according to the City of San Diego Biology Guidelines.

III. Environmental Setting and Related Impact Shortcoming

Potential Impacts from BMZ 2 Thinning to California adolphia and Other Special Status Species

COMMENT #3:

Section: 5.4, 5.4-1B Page:5.4-9

Issue: Brush Management Zone (BMZ) 2 is designated within wetland and riparian buffers and open space areas, but focused rare plant surveys were not conducted in these areas, and rare plants may be present. The mitigation measures provided do not provide sufficient avoidance of sensitive species that have the potential to be present during brush management activities.

Specific impacts: The DEIR states, "[t]he project footprint will avoid all areas of natural habitat and sensitive vegetation communities where the species listed below could occur. Therefore, focused rare plant surveys were not conducted." The Project proposes to avoid direct construction disturbance within sensitive vegetation communities, including wetland buffer areas, but also proposes BMZ 2 and potential bridge/path maintenance within these areas.

Although BMZ 2 brush thinning is impact neutral for mitigation purposes, brush management still could impact sensitive native plant species. Since focused plant surveys have not been conducted, and there are previous occurrences of California adolphia on site (California Natural Diversity Database (CNDDB) 2021), rare plants have the potential to be present. Since BMZ 2 thinning is planned within these natural habitat areas, and bridge repair may occur within these areas, sensitive plant species may be impacted by these aspects of the Project and have not been identified in the DEIR and sufficiently addressed by the Project mitigation measures. Furthermore, in Figure 5.4-1B, the BMZ 2 thinning zone is identified as 148-foot wide within native habitats until the intersection with the riparian zone, when the City's Landscape Regulations prescribes 100 feet, as quoted below.

Why impact would occur: CNDDB identifies California adolphia within the Project boundaries, and San Diego barrel cactus and variegated dudleya adjacent to the site (2021). Focused rare plant surveys were not conducted, under the assumption that natural habitat areas would not be directly impacted by the Project. However, the fuel modification zones may directly impact natural habitat areas or sensitive species because brush management activities are proposed within environmentally sensitive lands and are proposed at a distance greater than 100 feet.

Section 142.0412 Brush Management of Article 2, Division 4 of the City's Land Development Code discusses Landscape Regulations and states, "[b]rush management activity is permitted within environmentally sensitive lands (except for wetlands) that are located within 100 feet of an existing structure in accordance with Section 143.0110(c)(7)." Additionally, Section 142.0412(d) states, "[b]rush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15, except where documented

S2-14
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S2-15

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S2-18

S2-15

Refer to **Response to Comment O5-3-3**.

S2-16

Refer to **Response to Comment O5-3-3**.

S2-17

Refer to **Response to Comments O5-3-3** and **S2-7**. The Brush Management Regulations allow for alternative compliance pursuant to SDMC Section 142.0412(i), so long as an applicant can show that the proposed alternative compliance: (1) provides sufficient defensible space between all structures and contiguous areas of native or naturalized vegetation to the satisfaction of the Fire Chief based on a Fire Load Modeling Report (Fire Prevention Bureau (FPB) Policy B-08-1) that addresses the topography of the site, existing and potential fuel load; and other characteristics related to fire protection and the context of the proposed development; (2) minimizes impacts to undisturbed native or naturalized vegetation where possible while still meeting the purpose and intent of Section 142.0412 to reduce fire hazards around structures and provide an effective fire break; and (3) is not detrimental to the public health, safety, and welfare of persons residing or working in the area.

As explained in Section 5.19, Wildfire, of the Draft EIR, alternative compliance is appropriate here because of the existing conditions of the Project site. A Fire Fuel Load Modeling Report (FFLMR) that includes brush management width modifications and that satisfies the above criteria has been prepared and included in EIR Appendix D. City Landscape staff and the Fire Chief reviewed and accepted the alternative compliance proposal, and the modifications would be made conditions of approval.

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to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the City of San Diego's MSCP Subarea Plan."

Evidence impact would be significant: The City of San Diego Land Development Manual Biology Guidelines states on page 73, "[b]rush management Zone 2 thinning activities, while having the potential to adversely affect biological resources, are not considered potentially significant inside the MHPA or, to the extent that non-covered species are not impacted, outside the MHPA, because of the implementation of the MSCP." Brush management Zone 2 thinning outside the MHPA which affects non-covered species is potentially significant. California adolphia is a sensitive species, but is not a covered species, and therefore impacts are potentially significant.

Recommended Potentially Feasible Recommendations and Mitigation Measure(s)

Mitigation Measure # CDFW-BIO-3a: Brush management activities in environmentally sensitive lands shall occur outside of the bird breeding season (March 1 through August 15), and should occur between September-January.

Mitigation Measure #CDFW-BIO-3b:

To reduce impacts to less than significant: Prior to BMZ 2 thinning and bridge repair and maintenance, a qualified Biologist shall survey native habitat areas and flag occurrences of sensitive plant species, including but not limited to, any occurrences of Coulter's saltbush, variegated dudleya, California adolphia, and San Diego barrel cactus. Flagged individuals shall not be removed during BMZ 2 thinning or impacted by pedestrian bridge repair or path maintenance. The qualified Biologist shall be on site during vegetation removal activities to ensure sensitive plants are not impacted.

IV. Mitigation Measures and Related Impact Shortcoming

Potential Impacts to Nesting Raptors

COMMENT #4:

Section: Executive Summary, Page: ES-10-12

Issue: The DEIR identifies impacts to MSCP covered species, including Cooper's hawk, but does not propose sufficient avoidance and mitigation measures to address the impact.

Specific impacts: Impact Bio-1 identifies impacts to three MSCP-covered species: least Bell's vireo, coastal California gnatcatcher, and Cooper's hawk, as well as yellow warbler, which is not MSCP covered, and identifies their associated breeding seasons — March 1 through August 15 for California gnatcatcher, January 15 through August 31 for Cooper's hawk, and February 1 through September 15 for other breeding bird species. The DEIR notes that these impacts would be potentially significant, but then proposes to only conduct breeding season surveys and provide avoidance measures from February 1 to September 15 (Avian Protection Requirements Mitigation Measure 1E). This does not include the full breeding season for Cooper's hawk, as it is discussed in the DEIR.

S2-18

Refer to **Response to Comments 05-3-3** and **S2-17** regarding extending BMZ beyond 100 feet.

S2-19

Refer to **Response to Comment 05-3-3**.

S2-20

As outlined in the Draft EIR, Section 5.4, Biological Resources, mitigation for indirect impacts to potentially occurring yellow warbler, Cooper's hawk, and least Bell's vireo would be required. Project-related activities would avoid the breeding season (February through September 15) otherwise pre-construction surveys would be conducted. Regarding CDFW mitigation measures Bio-3b refer to **Response 05-3-3**.

S2-21

Although the proposed project has the potential to indirectly impact coastal California gnatcatcher, these impacts are not considered significant because the City has take authority for this species outside of the MHPA. The Executive Summary of the DEIR has been revised to remove California gnatcatcher from Table ES-1. Summary of Significant Environmental Impacts and Mitigation. Therefore, mitigation measure MM-BIO-1 only relates to yellow warbler, Cooper's hawk, and least Bell's vireo (refer to **Response to Comment S2-20**).

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S2-19

S2-20

S2-21

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Avian Protection Requirements Mitigation Measure 1E also implies that removal of habitat that supports active nests in the proposed area of disturbance is permitted outside of the breeding season, when removal of habitat that supports an active nest is prohibited.

Why impact would occur: Cooper's hawk may begin breeding in January, therefore there may already be an active nest by February 1, and the earliest egg dates can occur by the end of January (Unitt 2003). Therefore, Cooper's hawks and other raptors could be impacted if work commences in January and pre-construction surveys are not conducted until February. Furthermore, removal of active raptor nests is prohibited under Fish and Game Code.

Evidence impact would be significant: Fish and Game Code Section 3503 *et seq.*, and the City's SAP provide protection for nesting birds, and removal of habitat that supports an active raptor nest is prohibited regardless of the proposed breeding season. Potential impacts to nesting raptors would be in violation of the fish and game code and would be considered significant.

Recommended Potentially Feasible Mitigation Measure(s)

Mitigation Measure #CDFW-BIO-4:

Please revise the first sentence of Mitigation Measure MM-BIO-1(E) to include the full breeding season for Cooper's hawks and other raptors, and to state that removal of active nests is prohibited, but removal of potential habitat is permitted outside of the breeding season.

To reduce impacts to less than significant:

To avoid any direct impacts to the least Bell's vireo, Cooper Hawk, yellow warbler, and other nesting bird species, removal of potential nesting habitat, including native habitats and Eucalyptus trees in the proposed area of disturbance, should occur outside of the breeding season for these species (January 15 to September 15).

Revegetation Plan and Invasive Species Measure

COMMENT #5:

Section:3-Project Description, Page:3-7

Issue: The DEIR discusses revegetation areas but does not provide a proposed revegetation/landscaping plan. Additionally, the DEIR neither includes a mitigation measure to preclude the use of non-native species in the planting palette, nor a measure to ensure that all material used in the revegetation/landscaping plan is free of invasive pest species, such as Argentine ants.

Specific impacts: The DEIR proposes to revegetate former golf course fairways and areas disturbed by the proposed development but does not provide a revegetation/landscaping plan or mitigation measures to ensure that this is implemented in a manner which minimizes impacts to native habitat or discourages the spread of non-native/invasive species. Without this plan, CDFW cannot ascertain if impacts are less than significant without mitigation.

Revegetated areas are directly adjacent to native habitat in open space areas and are within 1,000 feet of the MHPA. The impact analysis in Biological Resources Section 5.4 states,

S2-21
Cont.

S2-22

S2-22

The breeding season for Cooper's hawk identified in the Draft EIR (February 1 to September 15) encompasses the reproductive range (late March through August, with peak activity from May through July). This is the same breeding season identified for Cooper's hawk in the life history account ~~for~~ prepared by the CDFW California Wildlife Habitat Relationships System (<https://wildlife.ca.gov/Data/CWHR/Life-History-and-Range>) and in the San Diego Management and Monitoring Program species profile (https://sdmmp.com/species_profile.php?taxaid=175309).

As stated in the Draft EIR, the applicant ~~is expected to~~ shall comply with Fish and Game Code Section 3503 and the Migratory Bird Treaty Act (MBTA). No mitigation has been identified for general nesting birds.

The project's landscape plan was included in the Vesting Tentative Map (VTM) sheets 43 to 58, and Appendix T to the Draft EIR, as well as the Design Guidelines, included as Appendix B to the Draft EIR. As explained therein, and discussed in Section 5.1, Land Use, and Table 5-1-2 of the Draft EIR, the project would replace dead and dying vegetation associated with the vacant golf course. Landscaping would include a California native drought-tolerant plant palette. New trees would be planted on the project site in accordance with the Design Guidelines and existing trees on site would be retained where feasible. The landscape plan identifies the native species proposed to be used. In addition, the project would be consistent with the Landscape Standards of the Land Development Manual.

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"[n]o long-term direct or indirect impacts associated with invasive species would occur, because the project would implement a landscaping plan that includes native plantings within the wetland buffer areas on the project site. In addition, the landscape plan for the proposed project precludes the use of non-native invasive plant species."

The proposed landscaping plan was not provided with the DEIR for public review, and without review of this plan CDFW cannot confirm that the measures provided in the plan are sufficient to avoid all impacts to native plant communities.

Additionally, without review of a revegetation/landscaping plan, indirect impacts to sensitive wildlife species cannot be assessed. For example, the DEIR does not discuss potential impacts from exotic species (i.e., Argentine ants) on San Diego horned lizard (also known as Blainville's horned lizard) nor does it propose avoidance and minimization measures to reduce potential impacts to this species.

Why impact would occur: The San Diego Land Development Manual – Biology Guidelines states, "...where revegetation or restoration is proposed, a revegetation/restoration plan shall be prepared in accordance with Attachment III, General Outline for Conceptual Revegetation/Restoration Plans."

Although the Project is not directly adjacent to the MHPA, it contains environmentally sensitive lands within open space areas, and those areas are within 1,000 feet of the MHPA. Many invasive plant species have wind borne seeds, and establishment could impact native habitats and sensitive species. Exotic plant species not to be used include those species listed on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory, which is available online at <http://www.cal-ipc.org>.

Also, the DEIR does not provide a measure to inspect all materials used in revegetation for invasive pest species such as Argentine ants. Argentine ants displace native ant species that are food for San Diego horned lizard, which is an SSC and MSCP-covered species. Habitat destruction from human development and agriculture, and the spread of non-native Argentine ants that displace the native food source, has threatened and eliminated Blainville's horned lizard from many areas (Jennings 1987). Indirect impacts from the Project, including the introduction of Argentine ants could negatively affect the San Diego horned lizard.

Evidence impact would be significant: Although the DEIR states that the landscape plan for the proposed Project precludes the use of non-native invasive plant species, the plan was not provided for review with the DEIR. Without enforceable Mitigation Measures provided in the DEIR, CDFW is not able to concur with the conclusion that no impacts have the potential to occur. Section 15126.4 (2) of the CEQA guidelines states, "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments." Relying on a Revegetation Plan that was not provided may be considered deferred mitigation and is not sufficient to ensure all impacts from invasive species are avoided.

Recommended Potentially Feasible Recommendation and Mitigation Measure(s)

The revegetation/landscaping plan should be made available with the final environmental document. CDFW recommends that sensitive plant species be included in the planting palette for areas that will not be disturbed by future brush thinning. Additionally, a measure to inspect all plant materials for invasive species and prohibit the use of Cal-IPC high rated invasive species anywhere within the development or open space areas, should be included in the Final EIR.

S2-23

Horned lizard was identified in the Draft EIR as having a moderate potential to occur within native habitat associated with the project area. However, impacts would be less than significant with implementation of the Area Specific Management Directives (ASMD) for the horned lizard. The ASMDs for the horned lizard include measures to maintain native ant species, discourage the Argentine ant, and protect against detrimental edge effects. The Final EIR has been revised to include a discussion of the ASMD for Multiple Species Conservation Program (MSCP) covered species with a potential to occur within this native habitat (Section 5.1.3 and Table 5.1-4). Edge effects would be limited to development in Unit 5-Lot 4; however, a 100-foot buffer is provided in this area to reduce edge effects from development. The amount of edge effects in this area is expected to be marginal in comparison to the existing development. Therefore, impacts would be less than significant.

S2-24

Comment noted.

S2-25

The City directs the commenter to **Response to Comments S2-23**.

S2-26

Refer to **Response to Comments S2-22** and **S2-23**.

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To reduce impacts to less than significant:

Mitigation Measure #CDFW-BIO-5a: Prior to offloading nursery products from delivery truck and prior to installation of common landscape improvements, container plants shall be inspected by the project biologist for the presence of disease, weeds, and pests, including Argentine ants. Plants with pests, weeds, or diseases will be rejected. Watering restrictions shall be implemented through the Homeowners Association or similar organization in areas that are adjacent to native habitat areas to reduce the spread of Argentine ants.

Mitigation Measure #CDFW-BIO-5b: The planting palette for the Project shall follow Cal-IPC recommendations, and will preclude the use of non-native invasive species throughout all revegetated areas of the Project.

Recommendation Measure #CDFW-REC-5: Please include Coulter's saltbush, variegated dudleya, California adolphia, and San Diego barrel cactus in the planting palette within appropriate habitat in open space areas that are not subject to BMZ activities.

Editorial Comments and Suggestions

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/bioceodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/bioceodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs. tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Elyse Levy, Senior Environmental Scientist, at Elyse.Levy@wildlife.ca.gov.

S2-27

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required. The project biologist will submit the required California Natural Diversity Database (CNDDDB) forms for the project.

S2-28

Comment noted. The project applicant will pay the appropriate fees upon filing of the Notice of Determination.

S2-29

Comment noted.

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Sincerely,

DocuSigned by:

David A. Mayer

— 070084520375408

David A. Mayer
Environmental Program Manager I
South Coast Region

Attachments: Attachment A: Recommendations and Mitigation Measures

cc: CDFW

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Jennifer Ludovissy, San Diego – Jennifer.Ludovissy@wildlife.ca.gov
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State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov
Jonathan Snyder, USFWS – Jonathan_D_Snyder@fws.gov

REFERENCES

California Fish and Game Code §2080, §3503

California Invasive Plant Council. 2021. CAL-IPC Inventory. (accessed January of 2021)
<https://www.cal-ipc.org/plants/inventory/>

California Natural Diversity Database [ds45]. 2021. Calif. Dept. of Fish and Wildlife. Biogeographic Information and Observation System (BIOS). Retrieved January 25, 2021 from
<https://apps.wildlife.ca.gov/bios/>

California Office of Planning and Research. 2019 or current version. CEQA: California Environmental Quality Act. Statutes and Guidelines, CEQA Guidelines § 15126.4 (2), Appendix G.

City of San Diego. 1997. Multiple Species Habitat Conservation Program, MSCP Subarea Plan.

City of San Diego. 2000. Municipal Code, Chapter 14: General Regulations. §142.0401, §142.0412 (d)

City of San Diego. 2016. California Environmental Quality Act Significance Determination Thresholds.

City of San Diego. 2018. Land Development Code - Biology Guidelines.

Jennings, M.R. 1987. Impact of the curio trade for San Diego Horned Lizards (*Phrynosoma coronatum blainvillii*) in the Los Angeles Basin, California: 1885- 1930. J. Herpetol. 21(4):356-358

Unitt, P. 2003 San Diego County Bird Atlas project. Unpublished data.

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Attachment A: Recommendations and Mitigation Measures

Biological Resources	Mitigation Measures	Timing	Responsible Party
CDFW-BIO-1	<p>Prior to the issuance of any grading permit, the City Manager (or appointed designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:</p> <p>No clearing, grubbing, grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the least Bell's vireo, until the following requirements have been met to the satisfaction of the City Manager:</p> <p>A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [dBA] hourly average for the presence of the least Bell's vireo. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction.</p> <p>a. If the least Bell's vireo is present, then the following conditions must be met:</p> <p>I. Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; <u>and</u>,</p> <p>II. Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied least bell's vireo or habitat. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the city manager at least two</p>	Prior to and During Construction	City/Project Proponent

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	<p>weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; <u>or</u>,</p> <p>III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16). Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.</p> <p>b. If least Bell's vireo is not detected during the protocol survey, the qualified biologist</p>		
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	shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether mitigation measures such as noise walls are necessary between March 15 and September 15 as follows: I. If this evidence indicates the potential is high for least bell's vireo to be present based on historical records or site conditions, then condition a. III shall be adhered to as specified above. II. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.		
CDFW-BIO-2a	Specific detail on bridge repair shall be provided in the Final EIR. Bridges that require repair and/or replacement, as well as the resulting potential impact areas, shall be identified. Sensitive habitat impacts on shall be mapped and the figures provided in the Final EIR.	Prior to and During Construction	City/Project Proponent
CDFW-BIO-2b	If the specific detail on bridge repair provided in the Final EIR reveals that project activities may significantly alter the bed, bank, or channel of Chicarita Creek, a Notification shall be submitted to CDFW pursuant to section 1600 <i>et seq.</i> of the Fish and Game Code. CDFW shall be consulted prior to submittal if it is unclear as to whether substantial impacts to LSA-jurisdictional resources may occur.	Prior to and During Construction	Project Proponent
CDFW-BIO-2c	If the specific detail on bridge repair provided in the Final EIR reveals that project activities may impact any MSCP-covered habitats, impacts will be mitigated according to the City of San Diego Biology Guidelines.	Prior to, During, and Post-Construction	Project Proponent
CDFW-BIO-3a	Brush management activities in environmentally sensitive lands shall occur outside of bird breeding season (March 1 through August 15), and should occur between September-January.	Prior to and During Construction	Project Proponent
CDFW-BIO-3b	Prior to BMZ 2 thinning and bridge repair and maintenance, a qualified Biologist shall survey native habitat areas and flag occurrences of sensitive plant species, including but not limited to, any occurrences of Coulter's saltbush, variegated dudleya, California adolphia, and San Diego barrel cactus. Flagged individuals shall not be removed during BMZ 2 thinning or impacted by pedestrian bridge repair or path maintenance. The qualified Biologist shall be on site during	Prior to and During Construction	Project Proponent

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	vegetation removal activities to ensure sensitive plants are not impacted.		
CDFW-BIO-4	To avoid any direct impacts to the least Bell's vireo, Cooper Hawk, yellow warbler, and other nesting bird species, removal of potential nesting habitat, including native habitats and Eucalyptus trees, in the proposed area of disturbance should occur outside of the breeding season for these species (January 15 to September 15).	Prior to and During Construction	City and Project Proponent
CDFW-BIO-5a	Prior to offloading nursery products from delivery truck and prior to installation of common landscape improvements, container plants shall be inspected by the project biologist for the presence of disease, weeds, and pests, including Argentine ants. Plants with pests, weeds, or diseases will be rejected. Watering restrictions shall be implemented through the Homeowners Association or similar organization in areas that are adjacent to native habitat areas to reduce the spread of Argentine ants.	Prior to and During Construction	Project Proponent
CDFW-BIO-5b	The planting palette for the Project shall follow Cal-IPC recommendations, and will preclude the use of non-native invasive species throughout all revegetated areas of the Project.	Prior to and During Construction	Project Proponent
	Recommendations	Timing	Responsible Party
CDFW-REC-5	Please include Coulter's saltbush, variegated dudleya, California adolphia, and San Diego barrel cactus in the planting palette within appropriate habitat for open space areas that are not subject to BMZ activities.	Prior to and During Construction	Project Proponent

Comment Letter S3



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STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

January 20, 2021

Elizabeth Shearer-Nguyen
City of San Diego
1222 1st Avenue, MS 301
San Diego, CA 92101

Re: 2021010224, Mariners Cove Project, San Diego County

Dear Ms. Shearer-Nguyen:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

RECEIVED

JAN 26 2021

Development Services

S3-1

S3-2

Response to Comment Letter S3
3 California Native American Heritage Commission
January 20, 2021

S3-1

Comments noted. The Native American Heritage Commission (NAHC) received notice of availability of the Draft EIR. The City agrees with the statements of law included in the comment.

S3-2

Consistent with this comment, the City consulted with Native American tribes traditionally and culturally affiliated with the geographic area of the project. Project-specific consultation details are provided in the following responses.

S3-3

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. **Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. **Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. **Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. **Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (f) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. **Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (a)).

S3-3

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf
Page 3 of 5

S3-3
Cont.

As disclosed in Section 5.16 of the Draft EIR, in accordance with the requirements of Public Resources Code Section 21080.3.1, the City contacted the Iipay Nation of Santa Isabel, the Jamul Indian Village, and the San Pasqual Band of Mission Indians, traditionally and culturally affiliated with the project area. These tribes were notified via email on May 13, 2020 and May 15, 2020. The Iipay Nation of Santa Isabel and the Jamul Indian Village responded within the 30-day formal notification period concurring with staff's determination of implementing monitoring during ground-disturbing activities. The San Pasqual Band of Mission Indians initiated consultation on June 16, 2020, and requested clarification on Native American monitoring as well as avoidance of the recorded archaeological site in conjunction with the mitigation monitoring program, and concluded consultation on July 31, 2020.

As described in Draft EIR Section 5.16, there is a potential for inadvertent discovery of a buried or subsurface resource that could be impacted during project implementation. Potential impacts would be considered significant.

Mitigation for potential impacts occurring during construction to unknown resources is identified in the Draft EIR in Sections 5.9 and 5.16, as well as in Chapter 10, which constitutes the Mitigation, Monitoring, and Reporting Program. The mitigation measure requires ~~the implementation of a~~ construction monitoring to be implemented during construction and/or maintenance related activities. Impacts were determined to

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation:** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1048) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Page 4 of 5

S3-4

be reduced to below a level of significance with implementation of the identified mitigation measure.

The project proposes a General Plan Amendment and is therefore subject to Senate Bill (SB) 18. Information sent to the NAHC and to all tribes identified by the NAHC as being traditionally and culturally affiliated with the project area pursuant to California Public Resources Code Section 21080.3.1(a), has occurred. The first outreach was in November 2019. At that time, the tribes were sent copies of the initiation report to the Planning Commission, an initial filing by the City Planning Department notifying the Planning Commission that a Community Plan Amendment (CPA) would comprise part of the project. This was the formal initiation of the 90-day CPA consultation process addressed in Government Code Section 65352.3. No request for coordination was received by the City. The second outreach occurred on December 24, 2020. This communication included the CPA in draft form, along with an explanatory letter and United States Geological Survey (USGS) map, consistent with Government Code Section 65352, and initiated a 45-day response period. ~~The final outreach will take place 10 days prior to the project's Planning Commission hearing. Notice will be provided pursuant to Government Code Section 65092(a).~~

S3-5

Each of the steps noted in this comment have been appropriately completed. The project area is located within an area identified as sensitive on the City's Historical Resources Sensitivity Maps; therefore, qualified City staff conducted a records search of the California Historical Resources Information System (CHRIS) digital database and identified recorded cultural resources within the

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

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S3-5
Cont.

S3-6

S3-7

S3-6

project boundaries. Additionally, an archaeological survey of the area with Native American (Kumeyaay) monitors occurred on September 3, 2019. No archaeological resources were observed during the field survey. A Sacred Lands Search was requested of the NAHC on August 13, 2019, and a response from the NAHC was received on September 13, 2019 that indicated no resources have been previously identified in the immediate project area, but included a list of Native American contacts. Outreach letters were sent on October 3, 2019 to all representatives on the NAHC list received on September 13, 2019.

Mitigation Measures HR-1 and HR-2 (and TCR-1) specifically address avoidance buffer distance requirements, as well as monitoring, the discovery notification process, and a determination of significance. The mitigation also expressly requires the presence of a qualified archaeological monitor, as well as Native American consultant/monitor, during grading, excavation, and trenching activities associated with construction. Where cultural items are recovered, the mitigation requires permanent curation identified in consultation with the Native American representative. As applicable, written verification is required from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. Treatment of human remains would occur in accordance with state codes and regulations, as described in Section 5.10 of the Draft EIR.

S3-7

The comment and provides concluding remarks. No further response is required.

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Comment Letter L1

Local Agencies

Response to Comment Letter L1 1 Poway Unified School District February 1, 2021

From: Alschbach, Rheia <ralschbach@powayusd.com>
Sent: Monday, February 1, 2021 2:00 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch Project No. 652519?SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Good Afternoon,

Please find attached comments from Poway Unified related to the Draft EIR notice of availability.

Please let me know if you have any questions.

Thanks,

1

Rheia Alschbach
Assistant Director
Planning Department
Poway Unified School District
15250 Avenue of Science
San Diego, CA 92128
Email: ralschbach@powayusd.com
858-521-2800 x.2447

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The Poway Unified School District (PUSD) is an equal opportunity employer/program and is committed to an active Nondiscrimination Program. PUSD prohibits discrimination, harassment, intimidation, and bullying based on actual or perceived protected characteristics under the law, including but not limited to ancestry, age, color, disability, gender, gender identity, gender expression, nationality, race or ethnicity, immigration status, religion, sex, sexual orientation, or association with a person or a group with one or more of these actual or perceived characteristics. For more information, please contact the Title IX/Equity Compliance Officer, Associate Superintendent of Personnel Support Services, Poway Unified School District, 15250 Avenue of Science, San Diego, CA 92128-3406, 858-521-2800, extension 2121.

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SUPERINTENDENT
Marian Kim Phelps, Ed.D.

POWAY UNIFIED SCHOOL DISTRICT

February 1, 2021

Via e-mail DSDEAS@sandiego.gov

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

RE: Response to Draft Environmental Impact Report
The Trails at Carmel Mountain Ranch

Poway Unified School District appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) and in reviewing the DEIR the District found a few minor errors that we request be corrected prior to finalization of the EIR.

The areas of concern are:

- Section 5.14 – Public Services and Facilities, *Schools*; paragraph one: 25 elementary schools, one kindergarten through grade 8 (K-8), six middle schools, five high schools, one continuation high school, and one adult/alternative school.
- Section 5.14 – Public Services and Facilities, *Schools*; paragraph two: Unit 17 is within the Shoal Creek Elementary School attendance boundary.

The District appreciates the opportunity to provide comments on the proposed project.

If you have any questions or require any additional information, please contact Assistant Director of Planning, Rhela Alschbach at 858.521.2800 Extension 2447 or ralschbach@powayusd.com.

Regards,

Ron Little,
Associate Superintendent of Business Support Services

cc: M. Kim Phelps, R. Alschbach

DISTRICT OFFICE: 15250 Avenue of Science, San Diego, CA 92128-3406 • (658) 521-2800 • www.powayusd.com

L1-1

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

L1-2

The comment requests a text edit be made within Section 5.14, Public Services and Facilities, of the Draft EIR. The applicable text has been revised to state: "The PUSD operates 26 25 elementary schools, six middle schools, one kindergarten through grade 8 (K-8) school, six-five high schools, and one continuation high school, and one adult/alternative school." Section 15088.5 of the CEQA Guidelines provides the regulatory framework for when an EIR must be recirculated prior to certification. The Draft EIR need not be recirculated because no new significant information has been presented and added to the Draft EIR as a result of the public review period, such as a new significant environmental impacts or mitigation measures. The revisions to the Draft EIR included in the Final EIR provide clarification, thus, recirculation is not required (refer to **Response to Comment O1-66**). Also refer to **Master Response 6**.

L1-3

The comment requests a text edit be made within Section 5.14, Public Services and Facilities, of the Draft EIR. The subject text has been revised to state: "There are two elementary schools, Shoal Creek Elementary School and Highland Ranch Elementary School, that would serve the project site. Units 15 and 16, 16, and 17 of the project would fall within the school attendance boundary for Highland Ranch Elementary School." Section 15088.5 of the CEQA Guidelines provides the regulatory framework for when an EIR must be

recirculated prior to certification. A recirculation of the Draft EIR would not be required, as no new significant information has been presented and added to the Draft EIR as a result of the public review period, such as a new significant environmental impacts or mitigation measures. The revisions to the Draft EIR, as included in the Final EIR, serve as clarification points to the EIR. No recirculation is required (refer to **Response to Comment O1-66**). Also refer to **Master Response 6**.

L1-4

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

Comment Letter L2

Response to Comment Letter L2
2 San Diego Association of Governments
February 8, 2021

Ms. Shearer-Nguyen,

Thank you for the opportunity to comment on the City of San Diego's Trails at Carmel Mountain Draft EIR. SANDAG appreciates the inclusion of multimodal mobility amenities and transportation demand management (TDM) strategies in the Draft EIR for the Trails at Carmel Mountain Ranch. As the City of San Diego finalizes the EIR, please consider the following additional strategies to enhance connectivity to nearby transit and encourage more active transportation activities for all trip types as a means of further reducing single-occupant vehicle trips.

- Consider providing neighborhood electric vehicle (NEV) shuttle infrastructure options that complement other active transportation facilities to help residents connect to/from the Rancho Bernardo Transit Station or Sabre Springs/Penasquitos Transit Station providing last-mile options
- Consider collaborating with MTS to determine how effective feeder bus service can better connect this community to major transit stations like Sabre Springs/Penasquitos or Rancho Bernardo Transit Center.
- Although the project is a residential development, and the Transit Priority Area (TPA) parking TDM requirements do not apply, please consider implementing progressive parking management strategies applicable to residential developments like unbundled parking and providing designated parking spaces for carshare vehicles.
- Consider electrifying the shared bicycle fleet and/or offering e-micromobility incentives to help residents reach destinations within 3 miles with ease

SANDAG currently offers several commute programs such as the Regional Try Transit program, the Carpool Incentive Program, and the Regional Vanpool Program. For additional assistance, SANDAG's iCommute team provides the region with support and tools to plan, design, and implement customized TDM programs. More information on regional TDM services can be accessed through iCommuteSD.com.

If you have any questions, please contact Seth Litchney (seth.litchney@sandag.org) and Tracy Ferchaw (tracy.ferchaw@sandag.org).

Thank you,

Tracy Ferchaw, MBA
Associate Business Analyst

(619) 699-1977
401 B Street, Suite 800, San Diego, CA 92101



SANDAG hours: Tuesday-Friday and every other Monday from 8 a.m.-5 p.m.
Employees are teleworking while our offices are closed during the COVID-19 pandemic.

L2-1

L2-2

Comment Noted.

Comment noted. At this time, the provision of neighborhood electric vehicle shuttle infrastructure options that complement other active transportation facilities to help residents connect to and from the Rancho Bernardo Transit Station or Sabre Springs Transit Station are not proposed as part of the project. However, as discussed in the Design Guidelines for the project (Appendix B to the Draft EIR), the residential component of the project will provide listed cabinets, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations, and at a minimum 3% of the spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents. The non-residential component of the project will provide listed cabinets, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations, and at a minimum 50% of the spaces would have the necessary electric vehicle supply equipment installed to provide active electric

~~vehicle charging stations ready for use by residents. at least 3 percent of parking spaces out of the total parking provided would contain a cabinet, box or enclosure connected to a conduit linking the parking spaces with electrical services to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations. Of those, 50 percent would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations.~~

- L2-3** Comment noted. At this time, no transit network improvements to the existing bus network are proposed as part of the project. Refer to **Response L2-2**.
- L2-4** Comment Noted. Impacts related to parking are not considered a CEQA issue, and thus were not addressed in the Draft EIR. The project would provide adequate parking as required by San Diego Municipal Code Table 142-05C. Unbundled parking or designated parking spaces for carshare vehicles are not proposed as part of the project.
- L2-5** The project does not propose to provide an electrified shared bicycle fleet or to offer e-micro-mobility incentives. Refer to **Response L2-2**.
- L2-6** Comment noted.
- L2-7** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

Comment Letter O1



January 23, 2021

E. Shearer-Nguyen, Environmental Planner,
City of San Diego Development Services Center,
1222 1st Avenue, MS 501,
San Diego, CA 92101,

Via e-mail to DSDEAS@sanidiego.gov.

Dear Ms. Shearer-Nguyen and City Council:

Sierra Club San Diego strongly opposes the proposed Trails at Carmel Mountain Ranch Project (heretofore the Project) in its current form. The Project violates the many provisions of the California Environment Quality Act (CEQA). The Project destroys the community character of Carmel Mountain Ranch and presents a number of unmitigable environmental impacts.

Sierra Club is not opposed to a more modest project consisting of 150-250 single family and attached homes, with 15% of the homes categorized as, "affordable housing."

Considerable environmental damage will result from this project. Additionally, the EIR is deficient in many respects. The Project will result in the destruction of community character, loss of the open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases in greenhouse gas exacerbating climate change, reduced air quality, and more

O1-1

O1-2

O1-3

Organizations

Response to Comment Letter O1 1 Sierra Club (Peter A. Anderson and George Courser) January 23, 2021

- O1-1** Refer to **Master Response 1** and **Master Response 2**.
- O1-2** The comment expresses support for an alternative project that would consist of 150-250 single family and attached homes within the project site, with a 15 percent affordable housing requirement. Refer to **Master Response 10**.
- O1-3** The comment is an introduction to comments that follow. Refer to **Response to Comments O1-4 through O1-66**.

gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigatable environmental impacts.

Destruction of Community Character

Without a doubt the Project does great harm to the community character of Carmel Mountain Ranch. Under CEQA a project must be consistent with community character. First, residents of Carmel Mountain Ranch purchased their homes under the assumption that open space and green space would be a prominent feature of their community. They had good reason to believe that green space would characterize the community since, the project site is designated Park, Open Space, and Recreation in the General Plan.” (5.7-16 of EIR). Moreover the original sales and marketing materials for Carmel Mountain Ranch featured inducements to buy onto “Spectacular 18-hole golf course” and “Fairway Views.”

The community plan for Carmel Mountain Ranch “establishes a community identity for Carmel Mountain Ranch through a consistent focus on topographic character and landscaping.” The community plan promises, “A community theme has been developed for Carmel Mountain Ranch to establish a distinctive identity for this new community along the I-15 corridor. The theme incorporates the extensive use of boulders, stone material, topographic relief and landscaping throughout the community to create an attractive image that will integrate the existing character of the site with the planned urban development.” It also says: “The topographic character of the site will be retained by preserving the more scenic areas on site as natural open space and by incorporating special grading and landscaping design guidelines within the urbanized area of the community.”

Construction of 1200 condos, apartments, and town homes is totally inconsistent with the community character of Carmel Mountain Ranch. The Project destroys much of the green space and visual aesthetics that the current residents enjoy. The open space, natural features, and natural topography will be destroyed by grading the terrain and by shoehorning a dense development into former open space. Moreover, the vast majority of structures in Carmel Mountain Ranch are single family homes. The proposed project consists entirely of town homes and three and four story apartment buildings and condos, which are wholly

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Refer to **Master Response 1** and **2**.

O1-5

The comment restates language from the Carmel Mountain Ranch Community Plan. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-6

Refer to **Response to Comment O1-1, O2-11a, Master Response 1, and Master Response 2**.

inconsistent with the community character and destroy the visual character of Carmel Mountain Ranch.

The inconsistency of the community character with this project is exemplified by the fact that according to the EIR "The Project requires a General Plan Amendment, Community Plan Amendment, Rezone, Master Planned Development Plan, Site Development Permit for Environmentally Sensitive Lands, and Vesting Tentative Map." Such major amendments and alterations in the proposed plans would be unnecessary if this project was remotely consistent with the community character of Carmel Mountain Ranch.

Loss of Open Space and Park Land

The EIR suggests the Project will expand designated park land. EIR makes it seem like the Project is providing 112 acres of open space and parkland. In reality, the Project would result in the reduction of 52 acres of open space. The greatest amount of open space would be provided by the "no project alternative" in the EIR. Sierra Club San Diego is committed to no net loss of open space. The EIR is deficient in that it attempts to hide the loss of open space and recreational land.

The EIR clearly states: "The project site is designated Park, Open Space, and Recreation in the General Plan." (5.7-16). The City of San Diego General Plan states: "The General Plan is the foundation upon which all land use decisions in the City are based. It expresses a citywide vision and provides a comprehensive policy." The City of San Diego climate action plan establishes the protection of open space as an important goal: "Protect Open Space, Parks and Recreation Parks and open space are important resources that contribute to San Diego's culture, character, and economy." Green spaces offer recreational and tourism opportunities. They also serve as a climate change adaptation resource where they can alleviate the heat island effect and potentially reduce the impact of flooding." There are numerous redevelopment sites for new housing including vacant industrial land, parking lots, and post-pandemic empty commercial property. Sierra Club San Diego believes that building new development on park land or open space is not in the best interest of San Diego or the environment.

Additionally, the EIR blatantly violates Senate bill 375 requires that California preserve open space and not build large housing projects on open space and park land.

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O1-11

O1-7 Refer to **Response to Comment O1-1, O2-11a, Master Response 1, and Master Response 2.**

O1-8 Refer to **Response to Comment O2-11a.**

O1-9 Comment noted.

O1-10 Refer to **Response to Comments O1-1 and O2-11a.**

O1-11 SB 375 directs planning agencies to "[i]nvestigate and make recommendations to the legislative body regarding reasonable and practical means for implementing the general plan or element of the general plan, so that it will serve as an effective guide for orderly growth and development, preservation and conservation of open space land and natural resources, and the efficient expenditure of public funds relating to the subjects addressed in the general plan." (Govt. Code Section 65400.) SB 375 does not prohibit development on or in open space. In addition, references throughout the legislation to open space generally refer to publicly owned land and/or areas protected by federal, state or local conservation programs on a long-term or permanent basis. (See, e.g., Govt Code Sections 65080.01(a), 65584.04(d)(2)(C).) The project site is a privately-owned, former golf course and does not meet those criteria.

Increased Wildfire Risk

Carmel Mountain Ranch is in a State-designated Very High Fire Severity Zone. As stated in the EIR, the fire history according to available data from CAL FIRE's Fire and Resource Assessment Program (CAL FIRE 2018a) approximately 55 fires have burned within 5 miles of the project site since the beginning of the historical fire data record (Appendix D). These fires occurred between in 1910 and 2014, with some years including more than one fire. Three of the fires in the historical record burned on the actual project site, including the 1943 unnamed fire that burned roughly 40,000 total acres, the 1967 unnamed fire that burned roughly 29,000 total acres, and the 1980 Assist No. 138 Fire that burned roughly 1,200 total acres. These fires preceded development of the site. The nearby Witch fire in 2007 burned over 200,000 acres in North County including the nearby communities of Ramona, Rancho Bernardo, Poway, and Escondido and burned for over 2 weeks. It destroyed over 1,000 residences including 365 in Rancho Bernardo just north of the Project and 90 homes in Poway, just east of the Project.

Building in very high fire severity zones is so dangerous that numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature. The City has no recent experience with large sprawl developments, certainly none since the fires of 2003 and 2007. The prolonged draught and deadly fires should give the City great pause in approving such a project.

Building in very high fire severity zones is dangerous for three reasons:

1. Additional residences increases the risk of human generated fire from normal human activities (vehicles, power equipment, barbecues, etc.).
2. Building in a high fire zone increases the impacts on people and property when a fire occurs.
3. Evacuation from a high fire severity zone is exacerbated by increased development (see the next section dealing with evacuation).

The EIR acknowledges that the Project is in a Very High Fire Hazard Severity Zone. The project site is classified as an extreme high fire severity zone per the state map on grid tiles 35, 36, and 40 (City of San Diego 2009). Fire Hazard Severity Zones are based on increasing fire hazard and are designated as "No

O1-12

O1-12

The comment restates language from Section 5.18, Wildfire, of the Draft EIR and provides background information related to wildfires. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-13

Comment noted. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

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Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-14

O1-15

Impacts related to wildfires are discussed in Section 5.19, Wildfire, of the Draft EIR. As shown in Draft EIR Figure 5.19-1, Very High Fire Hazard Severity Zones (Very High FHSZ), the southern portion of the project site (Assessor's Parcel Numbers 31303132, 31304062, 31370401, and 31303128) are designated as Very High FHSZs (CAL FIRE 2009). The balance of the project site lies outside of the Very High FHSZ. Areas designated as Very High FHSZ are not restricted from development, but, by California Building Code, Chapter 7A and California Residential Code, Section R327 and California Government Code 51175-89, are required to meet enhanced fire protection regulations, including ignition resistant exterior construction, including windows and doors, Class A roofing assembly, vent ember protection, ignition resistant accesso-

O1-15

Designation," "Moderate," "High," or "Very High." The EIR says is that brush management program will be instituted but these are only partially effective during wildfires. The EIR acknowledges that wildfire is a great risk for the Project when they state "Each unit within the project is proposed to have a private domestic water system and a private fire protection system." While these may help residents to a limited degree, a wildfire could easily incinerate residences with such systems as has been seen in numerous fires across this state and county in the last several years. Sierra Club opposes large developments in very high wildfire hazard zones.

The EIR is deficient in that it does not adequately assess the risk of wildfire and erroneously concludes: "The Project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Therefore, potential impacts related to wildfire hazards would be less than significant." The EIR fails to focus on wind driven Santa Ana fires that can burn thousands of acres in hours. The EIR focuses repetitively on brush management strategies (which is laudable) but fails to assess the risk of wildfires to the project and the liability associated and loss of life associated with building in a very high fire zone.

Increased Evacuation Risk

Evacuation from Carmel Mountain Ranch in the event of a wildfire will be extremely difficult and the proposed 1200 homes and 3500+ residents exacerbate an already dangerous situation. Most wildfires come the east during wind-driven Santa Ana conditions. Although large thoroughfares and freeways do exist in the area (Routes 15 and 56, Ted Williams Parkway and Pomarado road) these exits will be swamped by residents fleeing other large communities to the north and east including Poway, Rancho Bernardo, Ramona, Escondido and others.

Everyday traffic can create jams and stoppages. The city of Poway conducted a study of the area just east of Carmel Mountain Ranch and concluded:

"The areas adjacent to the study corridor are largely low-density residential neighborhoods. Community residents have expressed concern about the potential for new development projects to further exacerbate existing traffic congestion, cut-through traffic, and increase delays and travel time."

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ry and attached structures, restricted dead end road lengths and secondary access, and defensible space/vegetation management. The proposed project would satisfy all applicable state and local requirements for building within a Very High FHSZ. Thus, the project's potential wildfire impacts were determined to be less than significant in Section 5.19 of the Draft EIR. Refer to **Master Response 5** for more information regarding fire safety and brush management.

Comment noted.

O1-17

Section 5.19, Wildfire, of the Draft EIR is based on the Fire Fuel Load Modeling Report (FFLMR), which considered the potential for wind driven Santa Ana fires. Based on the FFLMR included in Appendix D to the Draft EIR, the analysis concluded that the extended protective brush thinning zone proposed with the project, would be five times the flame length of the worst-case scenario under peak weather conditions. As a result, the Draft EIR determined the project would not exacerbate wildfire risks, thereby exposing project residents to the uncontrolled spread of wildfire due to slope, prevailing winds or other factors. Refer to **Master Response 5** and **Response to Comment O1-15**.

O1-18

Evacuation issues were analyzed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, in the Draft EIR. Refer to **Master Response 5**. Subsequent to the Draft EIR's release, an Evacuation Plan was prepared for the project and is included in the Final EIR as Appendix D1. The Evacuation Plan supplements the Draft EIR's review and specifically analyzes

Ted Williams Parkway dead ends at Twin Peaks Road. The Study concluded "Twin Peaks Road and Espola Road experience heavy traffic during morning and evening commute hours and in the afternoon when the schools get out."

<https://www.poway.org/DocumentCenter/View/3917/Twin-Peaks-Road-Study-of-Traffic-February-2017?bidid=>

The Poway report shows that some of the intersections are rated D and E indicating high levels of congestion. This is during routine rush hour traffic, not during an advancing wildfire where evacuation could be nearly impossible.

Most sections of the EIR mentions evacuations only in passing and refers to city evacuation plans with no mention of the greater burden placed on an evacuation with a 1200 home infill project in the heart of Carmel Mountain Ranch. In section 5.19.3 an important question is posed: "Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?" Unfortunately, the analysis in the EIR is lacking, referring to MHMP and EOP of the City of San Diego. Amazingly, the EIR erroneously concludes, "The project would not impair or physically interfere with an adopted emergency response or evacuation plan and impacts would be less than significant" without any traffic studies or wildfire scenarios that would determine the impact of a large infill project on evacuation.

The EIR is devoid of meaningful evacuation analysis, but prior large wildfires in the area in 2003 and 2007 provide a vivid account of major evacuation problems.

In 2003 the Cedar fire to the south and west of Carmel Mountain Ranch offers another case study of a major fire in this region. "The **Cedar Fire** was a massive, highly-destructive wildfire, which burned 273,246 acres (1,106 km²) of land in San Diego County, California, during October and November 2003.^{[2][3]} The fire's rapid growth was driven by the Santa Ana winds, causing the fire to spread at a rate of 3,600 acres (15 km²) per hour.^[2] By the time the fire was fully contained on November 4, it had destroyed 2,820 buildings (including 2,232 homes) and killed 15 people, including one firefighter.^[2] Hotspots continued to burn within the Cedar Fire's perimeter until December 5, 2003, when the fire was fully brought under control." https://en.wikipedia.org/wiki/Cedar_Fire

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the project's potential impact on existing evacuation routes. The Evacuation Plan determines that local roadways, including Ted Williams Parkway, Carmel Mountain Road, Rancho Carmel Drive and Camino Del Norte, which provide access to major traffic corridors, including I-15 and SR-56, can accommodate existing residents and proposed project residents. Refer to **Master Response 5**.

O1-19

Refer to **Master Response 5**. An Evacuation Plan (Final EIR Appendix D1) was prepared for the proposed project. Draft EIR Section 5.8, Health and Safety, determined that the project would not impair or physically interfere with an adopted emergency response or evacuation plan. Evacuation-related impacts were determined to be less than significant.

O1-20

An Evacuation Plan has been prepared for the proposed project (Final EIR Appendix D1). Refer to **Master Response 5**.

O1-21

Comments noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

In the 2003 Cedar Fire, evacuations were problematic. According to Richard Hawkins, Fire Staff Officer for Cleveland National Forest. "This county has no culture regarding evacuation plans. The only community that had an evacuation plan prior to the Cedar Fire was Palomar Mountain. Where evacuation plans were in place and practiced, like Palomar Mountain, evacuations went well. Where they were not in place, like the majority of San Diego County and the entire perimeter of the Cedar Fire, evacuation did not go well."

In the Cedar fire "many of those killed were trapped by the flames which were driven by 60-mile-per-hour (97 km/h) winds that propelled the flames faster than residents could flee.¹⁴¹ Of those killed, 13 died in the first 24 hours of the fire. At least 10 people were trapped in their vehicles trying to outrun the flames." https://en.wikipedia.org/wiki/Cedar_Fire

Expert analysis of the 2003 fire recommend that new developments should be tied to the ability to evacuate (In Wildland Fires, Lessons Learned).

In his 2005 publication "Public Safety in the Urban-Wildland Interface: Should Fire-Prone Communities Have a Maximum Occupancy?" Thomas Cova reports that in many areas of the United States, housing is increasing without a commensurate improvement in primary road networks. He indicates that this dilemma compromises our public safety, making emergency evacuation times too long in duration—as the risk of wildland and structural fuels in the interface increases. To help address this situation, the suggestion has been made to link building codes to maximum occupancy in an enclosed space—as well as outlining the required number, capacity, and arrangement of exits." <https://nsjfire.org/wp-content/uploads/2014/04/Faces-20031.pdf>

In 2007 more wildfires ravaged San Diego County. The Witch Fire in nearby Poway and Rancho Bernardo resulted in many lost homes and large scale evacuations.

The Union Tribune reported that this was natural disaster of staggering scope, San Diego County's 2007 firestorms killed 10 people and destroyed 1,738 homes. Flames consumed 368,316 acres, an area larger than the city of Los Angeles. More than 500,000 people were evacuated, exceeding the number of Hurricane Katrina

O1-21
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evacuees. Motels across the county overflowed with people who were dislocated; others bunked down at the Del Mar Fairgrounds and what was then Qualcomm Stadium. "This is the new normal we live with," [fire chief] Mecham said. "Fires are something that no longer stay in the backcountry." A recent county survey showed that only **50 percent of residents could evacuate their homes within 15 minutes.**

"It's eerie when I talk to neighbors now," said Jack Beren, a Rancho Bernardo resident who lost two homes in the 2007 fires. "It's yesterday's news. But this is not like lightning. It does strike twice in the same place."

(<https://www.sandiegouniontribune.com/news/wildfire/sd-me-witch-creek-20171010-story.html>).

The 2007 Witch fire jammed roads, preventing rapid evacuation. A Union Tribune article states, "Fire officials evacuated the entire community of Ramona late last night as the Witch fire consumed at least 8,000 acres and sent flames more than 100 feet into the air. Roads out of the town were jammed as people sought safety after authorities contacted 10,000 households by phone at 9:15 p.m. Ramona's population is 36,000." (<https://www.sandiegouniontribune.com/sdut-witch-fire-prompts-evacuation-ramona-2007oct22-story.html>)

According to Wikipedia, "On Monday, October 22, 2007, the Santa Ana winds peaked, reaching sustained wind speeds of 90 mph (140 km/h), with winds gusting up to 112 mph (180 km/h). The extremely powerful Santa Ana winds fanned the wildfires in Southern California, causing many of the wildfires to rapidly expand westward. At 1:30 AM PDT on October 22, 2007, the Guejito Fire ignited southeast of the San Diego Wild Animal Park, within the San Pasqual River drainage. By 4:30 AM PDT, the Guejito Fire rapidly expanded to Interstate 15, forcing the closure of the freeway in both directions, which disrupted some evacuations from areas affected by the Witch Creek Fire." (https://en.wikipedia.org/wiki/Witch_Fire#:~:text=On%20the%20morning%20of%20October,the%20City%20of%20San%20Diego).

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<p>The EIR contains no analysis of various fire scenarios, the impact of closed freeways and highways, or both the ability of residents of the Project to evacuate or the Projects impact on the potential of other residents in Carmel Mountain Ranch and surrounding communities to evacuate.</p>	O1-22	<p>O1-22 Refer to Response to Comment O1-18 and Master Response 5.</p>
<p>Considerably more residents live in the communities around Carmel Mountain Ranch than lived there in 2003 and 2007. Residents of the area deserve a substantive fire evacuation study including the cumulative impact on evacuation of addition of 3000+ residents in the Trails at Carmel Mountain Ranch. To offer less that a detailed analysis represents a severe danger to the lives of Carmel Mountain Ranch residents.</p>	O1-23	<p>O1-23 An Evacuation Plan was prepared as part of the Final EIR (Appendix D1). Chapter 6 of the Draft EIR analyzed the project's potential cumulative wildfire and health and safety impacts and concluded that the project would not result in a cumulatively considerable impact in either respect. Refer to Response to Comment O1-18 and Master Response 5.</p>
<p>Importantly, the EIR concludes that there will be unmitigated impacts to Transportation, even under normal circumstances let alone during a wildfire.</p> <p>Clearly, the lack of a substantive analysis of wildfire scenarios and their impact on evacuations is a violation of CEQA and cause for rejection of the EIR and denial of project approval.</p>	O1-24	<p>O1-24 To clarify, the project's significant and unmitigated transportation/circulation impact occurs in the context of a vehicle miles traveled analysis, not a LOS analysis. Thus, the transportation/circulation impact has no relevance to the wildfire analysis. Refer to Response to Comment O1-18 and Master Response 5.</p>
<p>Creates more Sprawl Housing</p> <p>Sierra Club San Diego recognizes the need for housing, particularly urban infill and low income housing. However, this Project is not really infill. Although located with the City of San Diego, Carmel Mountain Ranch is suburban development. Infill not appropriate for suburban periphery of San Diego. The EIR states: "the proposed project would introduce a population beyond what is planned for the project site." The 1200 proposed homes is excessive resulting in reduced quality community character, crowding, high Vehicles miles travelled (VMT; see Climate Change section below). Sierra Club San Diego would support a project of approximately 200 hundred homes that are a mix of single family home, multi-family multifamily homes, and rentals.</p>	O1-25	<p>O1-25 The project is proposed on an underutilized, private-ly-owned site adjacent to and surrounded by existing residential development, near transit and commercial facilities and within an existing developed suburban community and therefore considered an infill site. With regard to community character, refer to Response to Comment O1-1 and Master Responses 1 and 2. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in Master Response 9, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Transportation/Circulation impacts are analyzed in Section 5.2,</p>
<p>The EIR states: "The site is primarily characterized by developed land/disturbed habitat (comprised of graded and previously maintained areas of the golf course as well as ornamental plantings and landscaping associated with the golf course use) and some native habitat (upland and wetland species)." Open space should not be converted to suburban sprawl development within the city of San Diego or</p>	O1-26	

elsewhere. This is one of the largest sprawl developments in the past several decades in San Diego and should require great scrutiny.

According to the City of San Diego *Land Use and Community Planning Element*, “it is the City of San Diego’s practice to apply zoning that is consistent with community plan land use designations to ensure their implementation.” <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/lu061016.pdf> The Sierra Club supports San Diego’s community planning element and urges the City to reject environmentally harmful amendments to the City’s plan.

Massive Increase in Greenhouse Gas

The huge amount of greenhouse gas (GHG) released from this project exceeds any GHG goals of the Climate Action Plans of the City of San Diego and State of California. The project will result in a massive increase in GHG even after some minor mitigations on the City of San Diego checklist are implemented. This project does not take us closer to the 1990 GHG levels, the goal of the City’s Climate Action Plan; it would not even come close to maintaining GHG at 2021 GHG levels.

First, the Project will produce massive amounts of GHG and air pollution during construction. The EIR reports that “diesel-fueled construction equipment would operate for an estimated 426,832 hours” that would produce enormous amounts of unmitigated GHG. Similarly construction workers would use 452,029 gallons of gasoline. The EIR indicates that the “Proposed project construction would include 957,607 cubic yards of cut and 995,763 cubic yards of fill as represented in the grading phase, which would require 38,156 cubic yards of import.” Of course the EIR acknowledges that “Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.” According to the EIR construction equipment would be run for 426,832 hours. But **nowhere** in the EIR do we see a total amount of GHG generated during 5 years of construction.

Second the Project will produce even more GHG even more during the operation of the 1200 homes with over 3000 residents. The EIR admits that “the project will continue to have a significant and unavoidable VMT transportation impact” (5.2-

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Transportation, of the Draft EIR. Transportation/Circulation impacts were determined to be significant and unavoidable. The City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project. The comment also identifies support of an alternative project that would consist of 200 single-family and attached homes. Refer to **Master Response 10**.

Refer to **Response to Comments O2-11a**, as well as **Master Responses 1 and 2**.

O1-27

Comment noted.

O1-28

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. As explained therein, projects that are consistent with the City’s Climate Action Plan, as determined through the Climate Action Plan Consistency Checklist (Draft EIR Appendix H), would result in a less-than significant cumulative greenhouse gas emissions impact. Since the project has been determined to be consistent with the City’s Climate Action Plan, the Draft EIR concluded the project would not result in a greenhouse gas emissions impact. Refer to **Master Response 8**.

10). This is a noteworthy admission that indicates clearly that project will have long term negative impacts on traffic and GHG.

The EIR states that these increases in GHG is unavoidable, which is blatantly false. GHG could be mitigated with offsite GHG mitigations elsewhere in the city or county. It can also be completely mitigated with the no project alternative.

The EIR states that the goal is to reduce the City's overall carbon dioxide footprint. But no calculation is provided comparing the GHG produced by the Project with the Projects mitigation measure. The result is that there is no calculation of the net GHG produced by this project as required by CEQA and SB32.

While the Climate Action Plan (CAP) of the City of San Diego represented a good step forward in controlling GHG, the City CAP has defects that do not enable the City to decrease GHG and to have a meaningful reduction of GHG.

In light of unresolved fundamental defects in the underlying modeling of the City's Climate Act (CAP) plan, Sierra Club is compelled to require the Carmel Mountain Ranch 1,200 home project to proceed with a standalone CAP, independent of the City's continued flawed emissions modeling. The widely reported defective assumptions, carried forward from 2010, are not only unchallenged by the city but readily agreed to, although dismissed as "Best Available Data" of GHG emissions. These faulty emissions falsely demonstrated that as early as November 2016 the City had reached reduction goals for 2020.

<https://www.sandiegouniontribune.com/opinion/editorials/story/2020-12-31/editorial-heres-glorias-first-misstep-as-mayor-using-bogus-data-for-greenhouse-emissions>

The findings have been uncontested by prior administrations in the city, but have been repeated by Todd Gloria, the current Mayor.

<https://www.sandiegouniontribune.com/news/environment/sd-me-climate-plan-report-20171025-story.html>

The data in the City of San Diego CAP cannot be trusted. As reiterated by the Union-Tribune, the City significantly overstates the 2010 base GHG generation during the "Great Recession," a period where the largest GHG contributor,

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O1-29

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Since the project complies with the City's Climate Action Plan, as evidenced by the Climate Action Plan Consistency Checklist, a project-specific greenhouse gas analysis was not required. Refer to **Response to Comment O1-28** and **Master Response 8**.

O1-30

The City maintains separate and distinct significance thresholds for transportation/circulation and greenhouse gas emissions impacts; a significant and unmitigated transportation/circulation impact is not relevant to the Draft EIR's greenhouse gas emissions analysis. Refer to **Response to Comments O1-28, O1-29, and Master Response 8**.

O1-31

Refer to **Master Response 8**. The Draft EIR does not state that impacts are significant and unavoidable. The project is consistent with the Climate Action Plan, and the Draft EIR concluded in Section 5.7, Greenhouse Gas Emissions, that the project would result in less than significant greenhouse gas emissions. Therefore, mitigation is not required. Refer to **Response O1-28** and **Master Response 8**.

O1-32

Refer to **Response to Comments O1-28, O1-29** and **Master Response 8**.

O1-33

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-34

Comment noted. The comment does not raise an

personal transportation precipitously declined due to the economic slowdown. Despite the GHG modeling being declared in the press as “bogus,” this version

of the City’s defective modeling remains in place, signaling that San Diego is widely ahead of AB 32 and SB 32 requirements when in fact they are not.

This appendix to the 2017 Annual Report of the City of San Diego’s Climate Action Plan (CAP) is disturbing in what it offers:

https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

The appendix provide four excuses that preclude consideration of the GHG modeling. The appendix also reveals that ARB guidance for determining per capita emissions cannot be utilized because San Diego’s emissions inventory fails to include all economic sectors and emission categories.

Sierra Club finds these flawed calculations both disturbing disingenuous, while allowing unbridled project approvals based on faulty GHG generation and a project “Checklist” untethered from GHG reality. Since this faulty checklist methodology is employed by the current Project the result is an invalid analysis not consistent with CEQA.

Recently the state of California has attempted to reduce vehicle miles travelled with the passage of SB743. But the Project is not compliant with 743; instead it creates large increases in VMT. The EIR reports, the “Project is not in a VMT efficient location per the VMT/Capita screening map.” Appendix G also states (page 3) that the Project is “112.6% to 122.1% of regional average VMT/Capita” for the city. This means that this Project is being built in a high VMT site. Appendix G of the EIR states that the impact to VMT are significant and unavoidable. “The expected Project VMT/Capita is 32-43% above the VMT significance threshold of 16.2. Since typical travel demand management measures can reduce VMT at most approximately 10-15%, the Project is expected to have a significant impact even with inclusion.”

Appendix G also states: “With mitigation, the Project will continue to have a significant and unavoidable VMT impact as explained in more detail below.” Even though some of the project is in a TPA the project would still generate large and unmitigable VMT contributing to substantial increases in GHG.



O1-34
Cont.

O1-35

issue related to the adequacy of any specific section or analysis of the Draft EIR.

Comment noted. Refer to **Master Response 8**.

O1-36

The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-37

Regarding the project’s location within a transit priority area, refer to **Master Response 3**. Regarding greenhouse gas emissions, refer to **Master Response 8**. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.

O1-35

O1-36

O1-37

The VMT is characteristic of other sprawl projects. Appendix G reaches another important conclusion: “The census tracts containing the Project (170.56, 170.55, and 170.39) have VMT/Capita of 21.7, 21.4, and 23.2, respectively. These values are between 32-43% above the VMT significance threshold of 16.2. While modeling the Project in the SANDAG model would provide the Project specific estimate of VMT/Capita, it can be inferred from the land use characteristics of the surrounding census tracts and their VMT rates that it is extremely unlikely the Project would generate VMT/Capita of 15% below the regional average, even with TDM reductions. Accordingly, the Project would have a significant impact relative to VMT.” Thus, the Project would create VMT above the city average and a corresponding high level of GHG.

As a result the Project would dramatically increase VMT and GHG blowing up City and State climate action goals. GHG city targets in response to former Governor Arnold Schwarzenegger’s Executive Order S-3-05 established the 2050 statewide greenhouse gas (GHG) reduction target of 80 percent below 1990 levels. Governor Schwarzenegger also signed Assembly Bill 32 (AB 32) in 2006 which set a statewide reduction target of 1990 levels by 2020 and created a comprehensive, multi-year program to reduce GHG emissions in California. The Project is a direct threat to those goals.

The EIR states that: “Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the ‘petroleum’ subsection.”

The Project utilizes natural gas during operation, an outdated energy source which may soon be banned in California. The EIR states: “Natural gas consumption during operation of the project would be required for various purposes, including, but not limited to, cooking and building heating and cooling. The proposed project would consume approximately 86,416 therms per year. The Sierra Club believes that the project should be all electric, consistent with the best practices in home construction.

During construction of the project the EIR states: “The majority of fuel consumption resulting from the project’s operational phase would be attributable to employees, visitors, and residents traveling to and from the project site. Calculations for annual fuel consumption are provided in Table 5.5-6. Mobile sources from the proposed project would result in approximately 708,087 gallons

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O1-41

O1-38

As concluded in Section 5.2, Transportation and Circulation of the Draft EIR, the project would result in significant and unmitigated transportation/circulation impacts. The project would implement mitigation measures to reduce impacts to the extent feasible in accordance with the City’s Mobility Choices Program. The City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project. Refer to **Master Response 8** pertaining to greenhouse gas emission impacts and Climate Action Plan consistency.

O1-39

The City’s Climate Action Plan was developed in response to state legislation and policies aimed at reducing greenhouse gas emissions, including Executive Order (EO) S-3-05, EO B-30-125, and Assembly Bill 32. Refer to **Response to Comment O1-28** and **Master Response 8**.

O1-40

The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-41

The comment does not raise an environmental issue within the meaning of CEQA.

of gasoline per year and 49,504 gallons of diesel per year, for a total of 757,591 gallons of petroleum consumed per year beginning in 2026 after project buildout. It is forecasted that in 2026, approximately 1.4 billion gallons of petroleum in San Diego County will be consumed (CARB 2019)."

Like other project the Sierra Club recommends that the project be all electric, utilize solar energy on all roofs and parking structures, transit to transportation center must be provided and electric car charging stations should be in located in all parking areas.

The bottom line is this: the Project's EIR is inconsistent with CEQA and other state GHG goals. The Project, even after mitigation, produces massive increases in GHG not consistent with State or National goal and should be rejected.

Reduced Air Quality

GHG that promotes climate change will result from this project but so will polluted air. The project also represents a major increase in air pollution and related health effects.

Unlike many construction projects the Project is surrounded by and immediately proximate to thousands of home. A large construction project within an existing neighborhood would produce abundant air pollution and dust.

Despite mitigation measures, fugitive dust from grading, hauling, conveying, and loading will occur. Fugitive dust is carcinogenic and is implicated in a host of respiratory problems including COPD, asthma, emphysema, lung cancer and premature death. Dust pollution would blow westward with the prevailing winds and pollute several communities of San Diego and the City of Poway. During Santa Ana winds dust would blow into Rancho Penasquitos and number of other San Diego communities,

In addition, fugitive dust in San Diego County can induce valley fever that is harmful and potentially deadly. Valley Fever is a serious and sometime fatal lung infection of the coccidioides fungi, which is often associated with grading and earthmoving. Some people experience a chronic cough; others can be stricken for years into such a limited capacity as to be bedridden by the infection. Deaths from coccidioidomycosis are not uncommon in high occurrence areas. There are three distinct stages of Valley Fever that manifest in patients; acute, chronic and

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O1-42

The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-43

As identified in Section 5.7.3 of the Draft EIR, the project would include cool/green roofs, electrical vehicle (EV) charging stations for at least 3% of public parking spaces, and solar photovoltaic panels consistent with that required for residential by the 2019 Title 24 standards. No covered parking structures are proposed as part of the project. A number of bus stops are located along Carmel Mountain Road which provide local transit to the nearest MTS transit center, the Sabre Springs Transit Station. A transit-to-transit center is not proposed to be constructed as part of the project.

O1-44

The Draft EIR has been prepared in accordance with the appropriate criteria, standards, and procedures of CEQA (California Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Title 14 Section 15000 et seq.). As described in the environmental document, the Draft EIR identified the significant effects caused by the project and identification of mitigation measures, where feasible. Refer to **Response to Comment O1-28, O1-29, O1-38**. Also refer to **Master Response 8**.

O1-45

Both an air quality analysis and a health risk assessment were prepared for the project and summarized in the Draft EIR, Section 5.13, Air Quality, and Appendix H, respectively. The Draft EIR concluded that the project would not result in significant air quality

disseminated coccidioidomycosis, with those suffering from compromised immune at serious risk. The operation of a construction site completely surrounded by residents in an area where Valley Fever occurs increases the rate of exposure and threatens those frequently outdoors, including seniors and children.

The EIR states: "Development of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM10 and PM2.5 emissions. The proposed project would be subject to SDAPCD Rule 55, Fugitive Dust Control. This rule requires that the proposed project take steps to restrict visible emissions of fugitive dust..."

Amazingly the EIR reaches an erroneous conclusion: "Maximum daily overlap of construction and operation would not exceed the operational emissions threshold or the 100 pounds per day threshold of PM10. Impacts would be less than significant. No mitigation would be required"

Sierra Club strongly disputes this conclusion and maintains that the respiratory health of residents of Carmel Mountain Ranch would be seriously impaired by the Project.

Transportation and Traffic

The Project produces a large increase in traffic in North County San Diego and the EIR concludes that transportation impacts are **unmitigatable**. This is despite the fact that "Portions of the Project site are located within a Transit Priority Area (TPA) due to proximity to the Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit Station approximately 0.5 miles south of the Project Site." Traffic is often stopped on area roads and Freeways, and this compounds an already serious problem.

Although a Transit Station is located near part of the project, it is important that not all of the project is in a Transit Priority Area. The "proposed project would result in an increase in density above what is currently zoned for the site. Because the proposed project would locate new residential units in close proximity to the San Diego Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit

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impacts to on-site or off-site sensitive receptors. Therefore, impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses a subject area, which received analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, a more specific response is not required.

The Draft EIR, Section 5.13, Air Quality, analyzed dust impacts from construction. The project would employ fugitive dust control measures in accordance with San Diego Air Pollution Control District (SDAPCD) Rule 55 to include regular watering and limiting speed on unpaved roads to 15 miles per hour. The analysis identified that the project would not exceed the maximum daily construction criteria pollutant emissions for PM₁₀ and PM_{2.5}, therefore impacts were determined to be less than significant, and mitigation was not required. Refer to **Response to Comment O1-29** and **Master Response 7**.

O1-47

Refer to **Master Response 7**.

O1-48

The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-49

Based on the air quality emission calculations conducted for the project, which assumed maximum construction emissions would occur at the same time as maximum operational emissions, it was determined that the estimated maximum daily overlap between construction and operational criteria air pollutant emissions would be less than significant. Also refer to **Response to Comment O1-45** and **Master Response 7**.

- 01-50** The comment restates information contained in the Draft EIR. Refer to **Master Response 3** for a discussion pertaining to the project's location within a transit priority area.
- 01-51** As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a)(2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

Station (1,000 feet) and an access point for the Interstate-15 High Occupancy Vehicle (HOV) lanes (2,000 feet).” However, the bulk of the project is 1 ½ miles from the transit stop and parts of proposed project are nearly three miles away from the transit stop. The most distant residents in the project are 14,000 feet from the transit stop. So it is misleading to conclude that this large and disjointed project is fully within a Transit Priority Area.

The EIR provide an estimate of the distance from Transit Station to the Project. The closest distance from the Project to the Transit stop is measured from hole 4 which is native habitat, not development. According to the EIR only “A portion of the project site is located within the TPA Overlay Zone” Most of the project is not within a TPA, so they are not afforded the following density bonus. “The TPA portion of the site is located approximately 0.5 miles north of the Metropolitan Transit System Sabre Springs/Penasquitos Transit Station. The remaining lots and units are located outside the TPA Overlay Zone and Parking Standards TPA. However, per Ordinance Number 21057, if a portion of the project is within the TPA (i.e., holes 4, 5, and 6), the designation and associated parking reductions would apply to the entire project site.” Since hole four is not housing at all, the project miscalculates the distance which entitles it to a density bonus. The vast majority of the Project is not within walking distance of the Transit station which is why only two of the units of nine are close enough to use transit. As stated in Appendix G: “Additionally, for residents of Units 5 and 6, the Project will provide a 25% transit subsidy as an additional mitigation measure.” This is an admission that most of the project is not in a TPA. Construction far from a transit hub should not qualify for a density bonus.

Also, since few of the new residents of the Project are within walking distance of the Sabre Springs Transit Station, most will still drive cars, contributing to the considerable congestion that already exists in the Carmel Mountain Ranch area.

Additionally, the Transit Station has very few routes and is inadequate. Only three bus routes run out of the Transit Station. Route 235 runs from Escondido downtown. But the trip takes about 50-60 minutes from Sabre Springs to Downtown on this route depending on traffic. A car can often complete the trip in half that time. Route 290 runs from downtown San Diego to Rancho Bernardo Transit Station (Basically the same route as 235 but doesn't go as far north as

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O1-52 Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O1-53 Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

Escondido). It has similar show transit time, which is why most residents will opt to drive.

None of the transit lines go East/West to Sorrento Valley where many residents work. To get West one must take the 235 or 290 to Mira Mesa and then transfer to a slow bus that goes along Mira Mesa Blvd.

Route 944 runs from the Sabre Springs Transit Station to a small portion of Poway sites along Poway Road, ending near the Poway Walmart. This route could be useful for some shoppers but few commuters use this route.

The EIR is also deficient and misleading when it claims that 13,000 jobs are available in Poway. The EIR fails to indicate how many jobs are vacant in Poway. In conclusion the vast majority of residents will work in Sorrento Valley, downtown, UTC and will be driving. Accompanying VMT, GHG, and traffic will be the result. Until true rapid transit, twenty years from now, comes on line with the Five Big Moves, this will continues to be the case.

Cumulative Impacts

The Project does not exist in a vacuum. This is why CEQA requires a detailed analysis of the cumulative impacts of the Project and other projects or activities in the area.

The EIR does acknowledge that growth associated with project would result in "large and unavoidable increases to traffic circulation and population." The EIR states: "Additionally, cumulative impacts associated with transportation/traffic circulation and population and housing would be significant and unavoidable."

Traffic and VMT would be much worse in the area of the project. The EIR states "the project would be unable to reduce VMT impacts to a less than significant level, and the project's contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant." In addition the EIR states: "at the project-level, the project would be unable to reduce VMT impacts to a less than significant level, and the project's contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant."

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O1-56

O1-57

O1-54

Comment noted. Refer to **Master Response 8**.

O1-55

A Cumulative Analysis was completed and outlined in Chapter 6, Cumulative Effects, of the Draft EIR. As outlined, cumulative impacts were determined to not be cumulatively considerable for all environmental issue areas, with the exception of cumulative transportation/circulation impacts related to transportation, which would be cumulatively significant; and a cumulative impact related to libraries. In addition, the Final EIR has been revised to state that cumulative population and housing impacts would not be cumulatively considerable. Refer to **Master Response 9**.

O1-56

Refer to **Master Response 9** and **Response O1-25**.

O1-57

The comment restates information contained in the Draft EIR. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

This would lead to increased gridlock, more air pollution, more GHG and reduced quality of life for people living in Carmel Mountain Ranch. The substantial cumulative impact of the Project on air quality and climate change is, by itself, enough to reject this project.

Likewise, the EIR acknowledges that the Project produces large and unmitigable cumulative increases in crowding and population density. The EIR states: “the project would directly induce substantial unplanned population growth based on the currently adopted Housing Element (City of San Diego 2013). In conjunction with other residential developments proposed in the surrounding area, the proposed project could result in cumulative impacts to population and housing. Therefore, cumulative impacts to population and housing would be cumulatively significant and unavoidable.” Cramming 1200 housing units and over 3000 residents into the open space of a planned community is in violation of the community plan. Development in the area will result in environmental damage to almost every aspect of life in the Carmel Mountain Ranch community and surrounding area.

Lack of Meaningful CEQA Alternatives

The Project should be rejected because it fails to provide meaningful alternatives as required by CEQA. Aside from the “No Project/No Development Alternative”, which the Sierra Club supports, no meaningful alternative to the project is provided. The EIR understates the best alternative: “The No Project/No Development Alternative would have the fewest impacts.” In fact it would have NO environmental impacts.

The EIR provides a so-called Reduced Density Alternative that is not substantially different from the primary proposal. This Reduced Density alternative would have the same footprint of the proposed project, but the density would be reduced. This would reduce the number of multi-family homes proposed from 1,200 to 825 (353 4-story apartments, and 472 3-story for-sale townhomes). This alternative would also reduce the estimated number of people anticipated to occupy the new development from 3,180 people to 2,186.

The so-called Reduced Density Alternative is not a real alternative; it reduces the size of the project by only 31% and most of the problems that accrue from the 1200 home alternative and also present in the 825 home alternative. Indeed, the

O1-58

O1-58

Refer to **Master Responses 2, 3, 7 and 8**. Pursuant to CEQA Guidelines §15064(e), an EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment.

O1-59

O1-59

Refer to **Master Response 1** for information on Community Plan consistency. Also refer to **Master Response 9** for information on population and housing.

O1-60

O1-60

Comment noted. Refer to **Master Response 10**.

O1-61

Comment Noted. The comment does not raise an issue related to the adequacy of the analysis included in the Draft EIR. Refer to **Master Response 10**.

O1-61

O1-62

Comment Noted. The comment does not raise an issue related to the adequacy of the analysis included in the Draft EIR. Refer to **Master Response 10**.

O1-62

EIR admits the impacts of the so-called Reduced Density Alternative would be slight. The EIR states: "The following issue areas that would be less than significant with or without mitigation under the proposed project, would be *slightly* [Ital. added] reduced under the Reduced Density Alternative: air quality, energy, greenhouse gas emissions, noise, transportation/circulation, public utilities, public services and facilities, population and housing, and visual effects and neighborhood character."

The Reduced Footprint Alternative is not a meaningful alternative to the project either. In fact it actually increases environmental impacts in several ways. The Reduced Footprint Alternative increases the height of some building to be 4 to 6 stories in height (48 to 68 feet tall) increasing congestion and visual impacts. Importantly, none of the other environmental harms are reduced at all since the same number of people will be shoehorned into Carmel Mountain Ranch.

What the EIR does not consider is other alternatives including making this entire Project mitigation property for other city development, turning 100% of the former golf course into parkland, or allowing urban farming on some or all of the property as it is already zoned as agriculture

Unmitigated Impacts

Even so, the EIR concludes that there are significant and unmitigated impacts to Transportation, Population and Housing, and Public Services, and Facilities. For several sections. Thus, the EIR concludes that a statement of overriding considerations is necessary for the city to ignore the considerable unmitigated impacts of the project.

The EIR concludes with the statement: "Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be to be significant and unmitigable identified in the EIR:

- Transportation/Circulation
- Public Services (Libraries)
- Population and Housing

Conclusion

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O1-63

The comment does not raise an issue related to the adequacy of the analysis included in the Draft EIR. Refer to **Master Response 10**.

O1-64

The comment does not raise an issue related to the adequacy of the analysis included in the Draft EIR. Refer to **Master Response 10**.

O1-65

The Draft EIR identified significant and unmitigated impacts to transportation/circulation, public services and facilities (library), and population and housing. However, the population and housing impact analysis has been revised in the Final EIR to conclude that the project would be consistent with the City's 2020 Housing Element, and would therefore not induce substantial unplanned population growth. This significance determination has been revised to less-than-significant in the Final EIR. Refer to **Master Response 9**. Regarding transportation/circulation and public services and facilities (libraries) impacts were determined to be significant and unavoidable. Findings for the significant effects identified in the EIR pursuant to CEQA Guidelines §15091(a)(3) would be made for the project and provided to the decision-makers for their consideration. Furthermore, pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations has been prepared for the consideration of the decision-making body and left to its discretion to determine whether to approve or deny the project or any of the alternatives, or combination thereof

O1-66

With regard to recirculation, a lead agency is required to recirculate an EIR when significant new information is added to the analysis after public notice is given of the availability of the environmental document, but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The project should not allowed to make statements of overriding consideration. Instead it should mitigate these deficiencies that the EIR concludes are unmitigatable.

The Sierra Club strongly urges the rejection of this project. We believe that a substantially downsized project (by 75%) or the no project alternative should be approved. As noted above the EIR is deficient in many respects and needs to be rewritten and recirculated.

Sierra Club opposes this project because it will cause substantial environmental damage. The Project will result in the destruction of community character, loss the open space and parkland, increased wildfire risk, elevated evacuation risk, creation of more sprawl housing, massive increases greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigatable environmental impacts. Sierra Club will seek all remedies in opposing this project.

Respectfully Yours,

Dr. Peter A. Andersen, Vice-Chairperson
Conservation Committee
Sierra Club San Diego

George Courser, Chairperson
Conservation Committee
Sierra Club San Diego

O1-66
Cont.

None of the aforementioned conditions apply, therefore, the City need not recirculate the Draft EIR. Refer to **Response to Comments O1-1 through O1-65**, as well as **Master Responses 1, 2, 3, 7, 8, 9 and 10**.

Comment Letter O2

Response to Comment Letter O2
2 Carmel Mountain Ranch United (Troy B. Daum)
January 31, 2021

O2-1 The comment is an introduction to comments that follow.

From: Troy Daum <Troy@wealthanalytics.com>
Sent: Monday, February 1, 2021 1:30 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: terra.lawsonremer@sdcounty.ca.go <terra.lawsonremer@sdcounty.ca.go>; CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; Hoeprich, Jack <JHoeprich@sanidiego.gov>; TGloria@SanDiego.gov <TGloria@SanDiego.gov>; PAvila@sanidiego.gob <PAvila@sanidiego.gob>; Eric Edelman (edelmanrealty@gmail.com) <edelmanrealty@gmail.com>
Subject: The Trails at Carmel Mountain Ranch, Project Number 652519/Sch No. 20200396006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

E. Shearer-Nguyen, Environmental Planner
 City of San Diego
 Development Services
 1222 1st Avenue, MS 501
 San Deigo, CA 92101

Dear Ms. Shearer-Nguyen, Ms. Lawson-Remer, Ms. von Wilpert, Mr. Edelman, and Mayor Gloria,

I am writing to you on behalf of Carmel Mountain Ranch United, a 501(c3). As president of the board, I am concerned about the recent EIR addressing The Trails at Carmel Mountain. The EIR itself makes it clear that the proposed project is very controversial.

It creates unmitigable environmental damage.

Our organization and teams of volunteers assisted with preparing the attached document. The purpose is to highlight the EIR deficiencies.

Our City, County, and State need more affordable housing. However, we can do much better by adhering to the many protections afforded by CEQA. Additionally, we should utilize the City of Villages concept for future development.

We should be building affordable housing above retail shopping malls and commercial office space. Online shopping and COVID are dramatically changing the commercial real estate space. Together, we should reimagine these spaces to address the affordable housing crisis. Housing in vacant space is reasonable because the infrastructure is already in place.

Dated ideas must change. We need to protect San Diego's open space and our environment. It is what makes our city special.

Los Angeles is a failed experiment. Let's not allow developers to pave over our precious open space to add more expensive housing in car-dependent communities.

Respectfully,

Troy B. Daum
 President,
 Carmel Mountain Ranch United
www.CarmelMountainRanch.org

O2-1

Troy Daum, CFP®
Principal



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Comment Letter O2

Trails at CMR EIR Concerns

Carmel Mountain Ranch United EIR for “The Trails at Carmel Mountain Ranch” Project

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Introduction and Background

Carmel Mountain United (CMRU) is a 501 (C3) non-profit that formed after the Carmel Mountain Ranch Golf club closed. Six hundred community members support our efforts to maintain open space in Carmel Mountain Ranch.

The EIR makes very clear that The Trails at Carmel Mountain Ranch, Project Number 652519/Sch No. 2020039006, is a very controversial project. The project has unmitigable environmental impacts. The EIR offers no solutions to the problems other than leaving the land Park and Open Space as it is designated in the community plan.

Therefore, until the environmental damage can be mitigated the project should not be allowed to continue.

We will outline our rationale in the document below.

EIR Requirements and Subjects

Appendix A of the EIR contains the original *Scoping Letter and Notice of Preparation Comments*

The Scoping Letter is a Development Services Department summary of CEQA Environmental Impact Report requirements that must be met, and lists these major areas and subjects.

- Executive Summary
- Environmental Setting
- Project Description
- History of Project Changes
- Environmental Impact Analysis
 - Land Use
 - Transportation/Circulation
 - Air Quality
 - Biological Resources
 - Geologic Conditions
 - Greenhouse Gas Emissions
 - Health and Safety
 - Historical Resources
 - Hydrology
 - Noise
 - Paleontological Resources
 - Population and Housing
 - Public Services and Facilities
 - Public Utilities
 - Tribal Cultural Resources
 - Visual Effects and Neighborhood Character
 - Water Quality
 - Wildfire
- Significant Environmental Effects Which Cannot be Avoided
- Significant Irreversible Environmental Changes
- Growth Inducement
- Cumulative Impacts
- Effects Found Not to be Significant

O2-2

The comment provides an outline of the topics discussed in the Scoping Letter and comments received on the Notice of Preparation (Appendix A of the EIR).

O2-1

O2-2

- Alternatives
 - No Project Alternative (Project not approved)
 - Other Project Alternatives ("reasonable" project alternatives)
- Mitigation Monitoring and Reporting Program
- References, Individuals and Agencies Consulted, Appendices
- Conclusion

Executive Summary

Project Does Not Meet Objective to Provide a Range of Housing Types

Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

~ The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to larger vehicle arterials and bus stops. . There is also substantial 60-100' variable landscape buffer areas with grade separation between different developments for further neighborhood distinction and defense purposes.

~ NUW developer has not provided a precise site development plan showing building pads and roadways which does not allow for a thorough community and city analysis of the project overall. Analysis and interpretations by City and others may not be accurate.

~ The NUW developer was asked many times to provide similar type housing next to existing housing types so as to blend seamlessly with the CMR community. At the 18th community meeting NUW instead came back with 3-4 story apartment housing that fails to be anywhere near compatible with the adjacent established residential communities.

~ Developer was constantly asked but failed (so far) to consciously preserve the view corridors of existing homeowners throughout project, especially premium views at hilltops and upper areas (as designed for in original Community plan. A site plan in a traffic study by developer indicated walls of 3-4 story buildings along with a lack of grade separation that is not only inaccurate but unacceptable to the CMR community plan guidelines for development.

~ A red-lined markup of the developer's guidelines for the Trails and a position letter were provided by the CMRSS/CC CPG to the City of San Diego Planning Department and NUW, yet this information was not part of the EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2). Also, no CMRSS/CC CPG meeting minutes references were found to be a part as well.

Proposed Multi-Family Multi-story Construction is Not Compatible With Existing Homes
Project Objective 1, Section ES.3 not met - as the range of housing types are not compatible with the adjacent established residential communities.

- The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%. The Trails consist of 70% Apartments, Carmel Mountain Ranch has 24%. Carmel Mountain consists of about 52% single family homes, The Trails, 0 single family homes.

↑
O2-2
Cont.

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O2-3

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O2-3a

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O2-3b

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O2-3c

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O2-3d

↑
O2-3e

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O2-4

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O2-4a

O2-3

Comment noted.

O2-3a

The comment provides background information regarding the existing Carmel Mountain Ranch community. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR. No further response is required.

O2-3b

The Draft EIR evaluated the environmental impacts of the project as described in Chapter 3, Project Description, and as governed by the Master Planned Development Permit and associated Design Guidelines. The project is also processing a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation.

O2-3c

Refer to **Master Responses 1 and 2.**

O2-3d

The City acknowledges the comment and notes that it pertains to the preservation of view corridors of existing homeowners, bulk and scale of proposed development, and consistency with the Community Plan. As noted in the City of San Diego CEQA Significance Thresholds document, views from private property are not protected by CEQA or the City's Significance Determination Thresholds.

As noted in Chapter 3 of the Draft EIR, the project would be constructed consistent with Design Guidelines and the Master Planned Development Permit (MPDP). The MPDP, in accordance with the

Land Development Code Section 143.0401 et seq. is the regulatory document that would govern development on the project site. As noted in Section 5.17, Visual Effects/ Neighborhood Character, of the Draft EIR, development of the project would comply with zoning, density, and height limits allowed by the applicable City-wide zoning regulations found in the San Diego Municipal Code, subject to the deviations allowed by the MPDP. In addition, refer to **Master Response 2**.

Regarding consistency with the Community Plan, refer to **Master Response 1**, and Table 5.1-2 and Table 5.1-3 of the Final EIR. Tables 5.1-2 and 5.1-3 provide a thorough overview of the project's consistency with the goals, objectives, and recommendations of the City's General Plan and the Carmel Mountain Ranch Community Plan, respectively.

O2-3e Documents provided to the applicant by the Community Planning Group were received during the cycle review process. Changes were subsequently made by the applicant to the project to include denser landscaping in the buffers and prohibit parking in certain areas. The Draft EIR includes a CEQA-compliant description of the proposed project.

O2-4 Comment noted.

O2-4a Comment noted.

<ul style="list-style-type: none"> The Trails at Carmel Mountain Ranch proposes building heights at 37' and 48' with minimum building setbacks at 50ft from the property lines of existing 2 story homes. 	<p>↑ O2-4a Cont.</p>	<p>O2-4b</p>	<p>Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.</p>
<p>Page 83 of the Carmel Mountain Ranch Community Plan under Design Compatibility, paragraph 1, "the choice of building Heights will be geared to the silhouette of the terrain: higher buildings are planned on lower ground particularly within the Town Center area".</p>	<p>O2-4b</p>	<p>O2-4c</p>	<p>Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.</p>
<p>Please see Figure 27 on page 84 of the Community Plan where apartment buildings are placed at lower elevations so as not to tower over single family homes. The apartments in Carmel Mountain Ranch are also built on the outer edges of the community, not in between rows of single family homes. Please see Google Maps for Carmel Terrace, Carmel Summit and Carmel Landing apartments: Google Maps satellite view of Carmel Ridge Road</p>	<p>O2-4c</p>	<p>O2-5</p>	<p>Refer to Response to Comments O2-3 through O2-3e.</p>
<p>The Trails will be an infill project with large multi-unit buildings 37' and 48' tall and 50' from existing 2 story homes. Height differences could be even greater depending on lot elevations.</p>	<p>O2-5</p>		
<p>In comparison, the 3 story Jefferson Apartments have at least a 100' separation from the condominiums at Windham and a 200' separation across the former fairway to the homes on Carmel Ridge Rd. Carmel Landing Apartments are a lower elevation to homes on the east and are separated by a 4 lane parkway (Rancho Carmel Drive) to the west. Homes in Carmel Mountain Ranch that have a 50-foot or less rear separation are of an equal height and type, single family home to single family home. Again, please see Google Maps above to confirm.</p>			
<p>Project Does Not Meet Objective to Provide a Range of Housing Types Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.</p>			
<p>~ The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to larger vehicle arterials and bus stops.</p>			
<p>~ NUW developer has not provided a precise site development plan showing building pads and roadways which does not allow for a thorough community and city analysis of the project overall. Analysis and interpretations by City and others may not be accurate.</p>			
<p>~ The NUW developer was asked many times to provide similar type housing next to existing housing types so as to blend seamlessly with the CMR community. At the 18th community meeting NUW instead came back with 3-4 story apartment housing.</p>			
<p>~ Developer was constantly asked but failed (so far) to consciously preserve the view corridors of existing homeowners throughout project, especially premium views at hilltops and upper areas (as designed for in original Community plan.</p>			
<p>~ A red-lined markup of the developer's guidelines for the Trails and a position letter were provided by the CMRSS/CC CPG to the City of San Diego Planning Department and NUW, yet this information was not part of the EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2). Also, no CMRSS/CC CPG meeting minutes references were found to be a part as well.</p>			

Only 10% of Project Assists Any Disadvantaged Groups

Project Objective 2, Section ES.3 not met - Assist the City of San Diego (City) in meeting state and local housing goals by providing opportunities for high-quality, new, market-rate and deed-restricted housing to meet the needs of current and future City residents on vacant land centrally located near existing jobs, transit, commercial, and industrial development.

~ 85-90% of proposed development is on super hilly building pads with 273' feet of elevation change and over 1.5 miles from Sabre Springs Transit Center. This is not accessible for seniors or comply with ADA, which does not meet the TPA guidelines.

100-foot Buffers for Sensitive Areas Are Needed on All Project Perimeters

Project Objective 3, section ES.3 not met - Preserve the majority of the project site as open space, avoid areas of native vegetation or potentially suitable habitat for special-status plant species, and avoid areas of sensitive habitat including jurisdictional areas and their associated 100-foot buffers.

~ Proposed development should utilize those same 100' buffers for edge conditions adjacent to existing sensitive golf course homes. The 100' buffers with the trails are needed to provide for the health, safety, security, noise and privacy issues created by a 100% publicly accessed trail.

Permanent Irrigation Will Be Needed for Most or All Revegetated Areas

Project Objective 4, section ES.3 not met - The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought-tolerant, native landscaping.

~ The blighted look of the golf course was created by current ownership. The course was also relandscaped only a few years with native landscape but the temporary irrigation was turned off. Any new landscape buffers will need to be thoroughly planted with durable drought and native landscape (trees and shrubs) that requires a permanent (NOT TEMPORARY) irrigation system to keep all common and buffer areas alive and growing.

Golf Course Blight Should be Remedied by Current Owners

Project Objective 4, Section ES.3 not met - "The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought tolerant native Landscaping"

The blight on the golf course has been caused by the neglect of the current Golf Course owner who closed the golf course in 2018 and has failed to maintain it properly. There is currently a Golf Course Maintenance Program in effect. There are several ways the blight could be reversed instead of creating an infill project:

- The owner could increase mowing and brush maintenance
- The owner could use the property for agricultural purposes, for example keeping the clubhouse open and converting the fairways to vineyards. See Monserate Winery, Fallbrook <http://monseratewinery.com/>
- The owner could sell the property under the AR 1 - 1 zoning

O2-6

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area. Refer to Master Responses 2 and 3.

O2-7

The Draft EIR addresses health and safety issues in Section 5.8, Health and Safety, and impacts were determined to be less than significant. Police and fire services is are discussed in Section 5.14, Public Services and Facilities, and impacts were determined to be less than significant. It was determined that existing police and fire facilities did not need to be expanded, and that no new facilities would be required.

In addition, the project would incorporate safety lighting throughout the project site – including the trail system and open space buffers – for security purposes as described in the analysis for General Plan Policy UD-A.13 in Table 5.1-2 of the Draft EIR. Public spaces (i.e., privately owned recreation amenities with a Recreation Easement recorded over them) would also be clearly marked and would be open for public use during designated hours. However, pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours. The trails and open space buffers will be monitored and maintained by the Master Homeowners Association (HOA). Further, the

O2-6

O2-7

O2-8

O2-9

porches and patios of the project's proposed residences would be turned towards the open space areas, including the trails and buffers, to ensure that there are "eyes" on those locations.

Impacts associated with noise were addressed in Section 5.11, Noise. Noise impacts were determined to be potentially significant, but with implementation of noise mitigation, those impacts would be reduced below a level of significance. The City also directs the commenter to **Master Response 4.**

Privacy is not an issue that is required to be analyzed under CEQA or the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.

02-8 Comment noted. All of the proposed open space, slopes and greenbelts on site will be revegetated and permanently irrigated as a condition of the MPDP. The Master HOA will be responsible for the installation and maintenance of those areas.

02-9 Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.

Public Recreational Area is Reduced, Easements show Trail-Side Amenities are Private
Project Objective 5, section ES.3 not met - Create a wide-range of active and passive public recreational opportunities above and beyond what is required by City regulations.

~ Actually, project is creating a net reduction in Parks and Open Space for CMR is being proposed as NUW is proposing developing over half of the 164-acre golf course (11 of 18 holes). Golf course is a recognized Parks and Recreational Open Space per the City's General plan. Project leaves a considerable amount of land unused, dormant and blighted with one of their proposed parks left for City to develop. This park location is very inaccessible via ADA or by any emergency or maintenance vehicles. (Unit 7)

~ Design guidelines suggest amenities may occur but do not seem to provide firm locations for them being proposed, such as: community gardens, vineyards, dog parks, fitness stations, interpretive signage, gathering areas, shaded seating, etc... (Public Easements are only proposed on the actual trails so any nearby amenities must be considered private and for development residents only.)

~ Community requested more parks and recreation areas due to uniqueness and amount of open space in CMR. These spaces should be developed recreationally such as additional playfields, playgrounds, passive park space, frisbee golf or skatepark.

Trails as Proposed Will Not Meet Proposed Uses and Will Create Other Problems
Project Objective 6, section ES.3 not met - Establish a multi-use trail system for pedestrians and bicyclists with connections to major amenities and adjacent neighborhoods. Establish a public system of trails and paths for community-wide use, thereby providing enhanced neighborhood connectivity.

~ A project called "The Trails" should set the bar high for trail-way development and accommodate many types of users such as walkers, hikers, joggers, runners, bird watchers, dog walkers, bikers and be ADA compliant.

~ Width of Trails is too narrow, not ADA compliant and create existing homeowner's safety, security, noise and privacy issues. Multi-use trails need to be at least 12 to 14 feet wide to accommodate two-way traffic and be a minimum of 50' from existing homeowner fences.

~ A multi-use trail requires planning for width, different durable surface types to eliminate erosion (concrete or asphalt), vertical clearance and trail amenities. Majority of development is on very hilly and sloping topography with elevation changes of over 270' with potential for erosion and excessive maintenance concerns. (CMR-RCA experience with DG trails shows significant erosion issues)

~ Benches, drinking fountains and shaded rest areas are valuable amenities to pedestrians. Where dogs are permitted, providing dog-friendly drinking fountains, bag dispensers and trash bins are necessary to encourage people to pick up after their dogs.

~ Amenities along the trails have not been specifically guaranteed for public use, so they must be assumed to be private for project residents only. The proposed Community Garden is only accessible on foot and from a steep trail leading from Unit 9 to Unit 17.

1/31/2021 - Page 7

O2-10

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.

O2-11a

The project site is a former 18-hole golf course, which is currently designated in the Carmel Mountain Ranch Community Plan as Private Recreation-Golf Course, and is not public open space.

The project would include approximately 111 acres of parkland, open space, and buffer areas. Specifically, the 111 acres includes approximately 5 miles of publicly accessible trails and 7.87 acres of publicly accessible parkland; 78.1 acres of open space; and 25.0 acres of buffer area. All of the proposed slopes, greenbelts and open space on site will be revegetated and permanently irrigated as a condition of the MPDP. The Master HOA will be responsible for the installation and maintenance of those areas to ensure they do not return to the current blighted condition. None of the property will be left fallow or unmaintained. Thus, the project would not decrease the amount of public open space in the community. To the contrary, the project would be clustered on 51 acres, leaving the balance of the site for open space and park uses. Refer to **Master Response 3**.

The project includes the recordation of a public recreation easement across all proposed trail facilities within buffer lots and proposed open space areas. As such, future development would not be permitted in these areas in a manner that restricts public access or impedes the use of the buffer/

greenbelt areas for public recreational purposes. All proposed public parks would be rezoned to designate these areas as public facilities.

To the extent that the commenter has opinions on the amenities that should be included in the proposed on-site parks, the City clarifies for the commenter that the park development process will follow project approval. Pursuant to Council Policy 600-33, the applicant will work with the City's Park and Recreation Department to develop a General Development Plan (GDP), which will provide a new master plan for the on-site facilities. All interested parties will have an opportunity to participate in the Community Recreation Group and the Park and Recreation Board planning process at the appropriate time.

Additionally, the applicant is processing a Community Plan Amendment to change the project site's designation from Private Recreation-Golf Course to Low-Medium Residential (6-29 dwelling units per acre), and Medium Residential (30-43 dwelling units per acre). The amendment also includes redesignation of land to Park and Community Commercial Uses. As explained in **Master Response 1**, and Tables 5.1-1 and 5.1-2 of the Draft EIR, the project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan.

O2-11b The park development process will follow project approval. Pursuant to Council Policy 600-33, the applicant will work with the City's Parks and Recreation Department to develop a General Development Plan (GDP), which will provide a new master plan for the population-based park facilities. All interested parties

will have an opportunity to participate in the Community Recreation Group (CRG) and Park and Recreation Board public input process at the appropriate time.

- O2-12** The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.
- O2-12a** Refer to **Master Response 3**.
- O2-12b** Refer to **Response to Comment O2-7** and **Master Response 3**.
- O2-12c** Trails would be 5- to 8-feet wide and partially constructed of decomposed granite. The balance of the trails would be concrete re-purposed from the existing golf path. Trail maintenance would be handled by the Master HOA, and given the materials proposed, the trails are not expected to erode. If there is an issue, however, the Master HOA will be responsible for addressing any repair or maintenance issues.
- O2-12d** Refer to **Response to Comment 2-11b**.
- O2-12e** The proposed trails would be accessible and open to the public ensured through provision of public Recreation Easement. Refer to **Response to Comment O2-7, O2-11a, O2-11b, and O2-12d**. Also refer to **Master Response 3** for information regarding ADA compliance.

~ A very big issue is Over 650 homes along the golf course have 'open style' Wrought Iron fencing that was to provide an open space/view shed easement to the private golf course. If these trails are made for public access, they will create serious safety, security, privacy and noise issues. The backyards of these homes will be exposed and create opportunities for predators and burglars which needs to be mitigated by developer.

O2-12f

Project Building Types and Setbacks Make it Incompatible with Existing Community

Project Objective 7, section ES.3 not met - Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure that the project is cohesive and respectful of existing properties.

O2-13

~ Proposed housing types not compatible with existing per Community Plan. Need 2-story single family housing types at upper elevation and core areas of existing CMR development to create appropriate and compatible densities. 3-4 story apartments should match style and locations as per CMR plan with 75'-100' landscape buffers.

O2-13a

~ Buffer zones need to 75'-100' so first 50' buffer can be 100% landscape and a 12' wide community trail can occur afterwards. No vehicular or roadway deviations to be allowed within first 50' of buffer so as to provide for existing homeowner's safety, security, noise and privacy issues.

O2-13b

~ Imagery, sections and drawings provided in guidelines are template and not of actual conditions.

O2-13c

~ Need actual to-scale sections in guidelines so can be reviewed accurately

O2-13d

Proposed Project is Not Cohesive or Respectful of the Existing Community

Project Objective 7, section ES.3 not met - The Trails at Carmel Mountain is not cohesive nor respectful of existing properties

O2-14

- The project is not cohesive in that it infills former golf fairways spread throughout the Carmel Mountain Ranch Community.
- It is not cohesive in that the density and type of housing will stand out instead of blending in with the community.(please see the response to Objective #1)
- The project is not respectful of existing properties as it is 100% multi-unit buildings, the buildings are all three and four stories tall, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing homes. Please see page 9 of the Design Guidelines for density and heights of the proposed buildings and page 14, Transitions, Buffers, Edges and Screening for buffers and circulation elements. In addition, the EIR alternatives create possibility that apartments could be even taller (5-6 story) in Unit 9, which would require additional mitigative efforts.

O2-14a

O2-14b

O2-14c

Rules for Project Alternatives Evaluation Send Mixed Messages

Section ES.8 Project Alternatives ~ As mentioned initially in this document, this EIR is an informational document that is intended for use by City decision-makers and members of the general public in evaluating the potential environmental effects of the project. This project is a very controversial development that is disrupting the lives of a well-established community of over 15,000 residents and businesses by one owner. They are attempting to profit by

O2-15

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O2-12f Refer to **Response to Comment O2-7**.

O2-13 Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O2-13a Regarding compatibility of housing types, this was addressed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character. Also refer to **Master Response 2**. Regarding a two-story single-family alternative, refer to **Master Response 10**. The CMR Community Plan does not address the size of buffer widths. The project would include a minimum 50-foot buffer zone between existing homes and proposed new development, which may include open space and landscaped areas, for a total of 25.0 acres of buffer area. As stated in the Design Guidelines, circulation elements, such as drive aisles, driveways, parking areas, paths and trails would encroach into the buffer area for a maximum of 35% of the gross buffer lot area of each unit. The buffer area is comprised of three component parts: 1) a 15-foot landscape only zone, where no roads or other infrastructure is permitted; 2) a 15-foot limited use area, where parking is not allowed, but limited encroachments for access is permitted; and 3) a 20-foot area would include parking, drive aisles and other encroachments (see Design Guidelines Appendix B (Section 3(f)) to Draft EIR).

O2-13b Refer to **Response to Comment O2-13a**.

O2-13c Comment noted. The comment does not raise an issue related to the adequacy of any specific section

or analysis of the Draft EIR. Regarding the renderings in the Design Guidelines, these were provided to illustrate how development may occur consistent with the Design Guidelines. Project development must comply with the Design Guidelines as required by the MPDP. The design guidelines establish an overall framework for future development of the property and will be implemented by subsequent building plans and construction drawings. Refer to **Master Response 2**.

- 02-13d** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Refer to **Response to Comment 02-13c**. No further response is required.
- 02-14** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.
- 02-14a** Refer to response to **Comment 02-3c**.
- 02-14b** Regarding community character, land use compatibility, and density, refer to **Response to Comment 02-3c** and **02-3d** and **Master Response 1** and **2**. Regarding density, the project proposes residential land uses that would be constructed within 52.9 acres and would range in density from 12.9 to 37.4 dwelling units per acre. The project would require the processing of a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation, which would increase the intensity of use and allow for the proposed residential development on site (see Table 3-1, Proposed Land Use and Zoning). Impacts associated with the increase in intensity on the site are analyzed and addressed throughout this EIR.

O2-14c The project would include a minimum 50-foot buffer zone between existing homes and proposed new development, which may include open space and landscaped areas, for a total of 25.0 acres of buffer area. Refer to **Response to Comment O2-13a**.

The Reduced Footprint Alternative was not determined to be the environmentally superior alternative and is not proposed by the applicant. That alternative was included to satisfy the requirements of CEQA. Refer to the analysis in Chapter 8, Alternatives of the Draft EIR.

The Reduced Footprint Alternative would not be consistent with Urban Design Element Policy, UD-A.6 (b), which suggests relating buildings to existing and planned adjacent uses. This alternative would also not be consistent with Urban Design Element Goal B, Distinctive Neighborhoods and Residential Design Goals, which aims to provide infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods.

Furthermore, the Reduced Footprint Alternative would not achieve all of the project objectives as it would not provide a range of multi-family housing units (Objective No. 1) on site. In addition, the increase in the height of the buildings on Unit 9 to 6 stories would be undesirable for existing homeowners and would be inconsistent with the surrounding community character. Surrounding developments have heights up to 3 stories, which is the maximum building height proposed as part of the project.

- O2-15** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Regarding culture and value, pursuant to CEQA Guidelines, Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value, culture, and general quality of life are not physical changes to the environment.

an attempt to rezone their existing property that will allow an outrageous change in population that will change the culture and value of the existing development forever. It seems somewhat confusing that the selection of alternatives chosen in this EIR is governed by a so-called "rule of reason" (required to evaluate only those alternatives necessary to permit a reasoned choice). It would seem more appropriate and fairer that one of the alternatives should be sought that mitigates the impacts and reaches out to blend better with the community plan and existing development. This is especially true since the focus of this analysis is to determine 3 items (1) whether the alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of the alternatives, and (3) whether the alternatives meet all or most of the basic project objectives.

Reduced Density Alternative Should Be Much Smaller

Section ES.8.2 Reduced Density Alternative This alternative would have the same footprint of the proposed project, but the density would be reduced. This would reduce the number of multi-family homes proposed from 1,200 to 825 (353 4-story apartments, and 472 3-story for-sale townhomes). This alternative would also reduce the estimated number of people anticipated to occupy the new development from 3,180 people to 2,186.

~ 825 units are not much of a reduction. Why not reduce to 250 or 300 units and do an alternative analysis for that and reduce the number of impacts being made.

~ Also 2.65 people per unit seems light. The trends these days are more like 3-4/ unit as families combine resources. So, it is likely that there are more like 3600-4000 residents being proposed. Either way, a 30% plus increase in population is very drastic and plopping all of it into 50 acres (7% of total CMR property) would be irresponsible planning-wise and change the VMTs and other significant numbers even more dramatically.

Land Use

Project Site Has Low Village Propensity vs. CMR Plaza and Residential Area

Per San Diego General Plan Land Use and Community Planning Element: (EIR Pg. 112) - "According to Figure LU-1 of the Land Use and Community Planning Element, the project site itself has low Village Propensity, however the area immediately to the north (residential and Carmel Mountain Plaza) is considered to have higher Village Propensity." This supports the notation that mixed-use development of the CMR Shopping Centers would be more beneficial to the community than the proposed project.

Project EIR Omits Walkability from City of Villages Compliance Evaluation

Table 5.1-2 (EIR Pg. 126) - Project's Consistency with City of San Diego's General Plan : The project is not compatible with the City of Villages Strategy

Per the EIR, "A. City of Villages Strategy. "Mixed-use villages located throughout the City and connected by high-quality transit."

The EIR omitted the term walkable villages. Per pg. ME-5 of the Mobility Element of the City of San Diego's General Plan, "... The strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and **walkable villages** that are connected to the regional transit system."

Pg. ME-6 of the Mobility Element of the General Plan under goals says:

↑ O2-15
Cont.

O2-16

O2-17

O2-18

O2-19

O2-19a

↓ O2-19b

O2-16

Refer to **Master Response 10** for further information regarding alternatives.

O2-17

Refer to **Master Response 10** for information regarding alternatives. Also refer to **Master Response 9** for information regarding population.

O2-18

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

O2-19

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

O2-19a

The cited language is not associated with a specific goal or policy, and thus is not required to be included in Table 5.1-2 of the Final EIR, which provides a breakdown of how the project is consistent with applicable goals and policies of the City's General Plan. No revisions to the Draft EIR are therefore required. Further, a discussion of how the project is consistent with the Mobility Element's Walkable Community Goals can be found in Table 5.1-2 of the Final EIR. Refer to **Master Response 1**.

O2-19b

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

A. Walkable Communities Goals "A city where walking is a viable travel choice, particularly for trips of less than one-half mile."

- Carmel Mountain Ranch is not a compact, walkable community. The Community Plan for Carmel Mountain Ranch was approved in 1984, 18 years before the City of Villages Strategy Was approved by the city council. The Transit Center was added to the southwest corner of Carmel Mountain Ranch in 2014 and is 1.4 miles (and a 130 foot climb) away from the community Town Center.
- The city of villages concept calls for compact, mixed-use, and **walkable villages** that are connected to the regional transit system.
- The trails project wishes to infill the former golf course whose fairways were spread throughout the community. Only a small portion of the proposed development is within a half-mile of the transit center, approximately 276 units. Unit 16 is about 2 miles walking distance from the Transit Center and 0.4 mi from Ralphs. Units 9 and 10, with a projected 500 residents, are on average 1.5 miles from the Transit Center and 1 mile to Ralphs, exceeding the ½ mile walkable goal in the City's Mobility Element. (using the clubhouse, 14050 Carmel Ridge Rd and 12001 Ferncrest for averages).
- Beyond the distances are the extreme elevation differences between most of the new units and either the Shopping Center or the Transit Center. Further, the topography, street layout, and locations of Trail points of connection to existing streets force walking paths to traverse steep (up to 10% slopes) grades to move around the CMR community. See [Appendix A, Carmel Mountain Ranch Elevation Maps](#) for detailed support

Project EIR Misleads in Its Walkability City of Villages Compliance Evaluation

Table 5.1.2 (Pg. 143) Project's Consistency with City of San Diego's General Plan

Mobility Element A) Walkable Community Goals:

"A city where walking is a viable travel choice, particularly for trips of less than one-half mile."

"A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities."

- The Project's analysis of walkable community goals is inadequate because it does not include distance and topography information. In most cases distances are too great and hills are too steep for casual walks to the store.
- The "Trails" being described as connecting the community are trapped by existing houses and in only a few cases actually save time or energy over walking existing sidewalks.
- The safety of the paths may become a concern as casual bicycle riders find them too steep and mountain bike riders find them challenging and thrilling for the same reasons. With widths varying from 5 to 10 feet, and some parts surfaced with Decomposed Granite walkers may find it uncomfortable to share them with bicycles passing at substantial speeds.
- The issue is the same with regards to walking distances to Transit Center and Shopping. Most of the project is greater than ½ mile to either the Transit Center or Shopping. The former golf cart trails meander thru the community and connect the former fairways to each other. They are surrounded by existing homes and accessible to residents of The Trails. Existing residents would have to access the trails where they exit onto the sidewalk.

Project Does Not Meet SD General Plan Urban Design Goals for Use of Open Space

The important locations of the open space parcels being developed will change the look and feel of the community. The project is NOT consistent with policies UD-A.1 and UD-A.2.

Urban Design Element Policy UD-A.1 (Table 5.1.2 (EIR Pg. 159) Project's Consistency with City of San Diego's General Plan) Part a. "Protect the integrity of community plan designated open spaces"

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02-19b
Cont.

02-19c

02-19d

02-19e

02-19f

02-20

02-20a

02-20b

02-20c

02-20d

02-21

02-19c

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

02-19d

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

02-19e

The City provides background information regarding the project's location, and the number of units in proximity to the ~~Saber~~ Sabre Springs/Penasquitos Transit Station. As identified in Chapter 2, Environmental Setting, a portion of the project site is located within the TPA Overlay Zone (i.e., Units 5 and 6), as shown on the City's TPA map (City of San Diego 2019a). The entire project site is therefore considered to be within a transit priority area pursuant to the Mobility Choice Regulations included in San Diego Municipal Code Section 143.1101, et seq. Refer to **Master Responses 2 and 3.**

02-19f

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

02-20

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.

02-20a

Refer to **Response to Comment 02-19e**. As noted in Draft EIR Table 5.1-2, the project site, including pedestrian/cart pathways, as it exists today is closed to public access. The site currently does not allow for pedestrian use or connectivity. The project

would directly improve the walkability of the project site and surroundings by providing a publicly accessible trail network connecting the proposed project and the surrounding neighborhood to nearby commercial and transit options. It should also be noted that portions of the project site are located within one-half mile from the Carmel Mountain Plaza, the Carmel Mountain Ranch Recreation Center, and the Sabre Springs Transit Center. New and existing trail segments will also connect to sidewalks providing direct access to these amenities.

- O2-20b** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.
- O2-20c** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.
- O2-20d** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.
- O2-21** The project's consistency with the applicable General Plan's Urban Design Goals is provided in Table 5.1-2 of the Draft EIR. Also refer to **Master Responses 1** and **2**.

<ul style="list-style-type: none"> - Carmel Mountain Ranch was designed with the golf course land counting as part of the community's Open Space and per the Community Plan, "as a physical and visual amenity that will link the natural and physical features of the community into a coherent whole" 	
<p>Urban Design Element Policy UD-A.2 "Use open space and landscape to define and link communities."</p> <ul style="list-style-type: none"> - The Trails at CMR takes away the very concept that Carmel Mountain Ranch was built upon, using open space of the golf course to define and link the community. Boundary planting, even with a pathway cannot mitigate the placement of apartment and condominium complexes along with their connecting roads, parking lots, and refuse enclosures in the most central area of more than half of the former fairways. 	O2-21 Cont.
<p>Project Designs are NOT Sensitive to the Well-established Character of CMR</p> <p>Pg 164 Urban Design Element Policy UD-A.5 (Table 5.1.2 (EIR Pg. 164)) Part b. "Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character."</p> <ul style="list-style-type: none"> - The Trails at CMR project is not coherent with the existing development due to scale and density . Current apartment buildings are located on stepped hillsides away from single-family homes. When nearby, they are built on pads that are below those homes. - Proposed buildings will in most cases be built on ground that is roughly level with adjacent homes, making it impossible to still consider Carmel Mountain Ranch a golf-course community as it was designed to be. Filling prime open space parcels with 3 and 4 story buildings will forever remove the feel of peacefulness that open green spaces bring. 	O2-22 O2-22a O2-22b
<p>Project Consistency with Urban Design Element of SD City General Plan</p> <p>Table 5.1.2 "Project's Consistency with City of San Diego's General Plan" Part B Distinctive Neighborhoods and Residential Design Goals,</p> <p>(EIR Pg. 171) Goal/Recommendation: "Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods."</p> <ul style="list-style-type: none"> - No mention was made in that section of the table where consideration was given to the existing residential neighborhood. A 15' landscape buffer, circulation elements at 30' and 50' building setback for 3-4 story multi family buildings are not sensitive to the existing 2 story single family homes. 	O2-23
<p>Pg. 173 Policy UD-B.1 "a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development."</p> <ul style="list-style-type: none"> - The Trails project does not match the scale of existing development as most of it will be adjacent to 2 story single family homes. 	O2-24
<p>Pg. 174 Policy UD-B.2 "c. Provide transitions of scale between higher-density development and lower density neighborhoods."</p>	O2-25

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O2-22	Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project's consistency with the General Plan and Community Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2 and 5.1-3. Refer to Master Responses 1 and 2.
O2-22a	Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project's consistency with the General Plan and Community Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2 and 5.1-3. Refer to Master Responses 1 and 2.
O2-22b	Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project's consistency with the General Plan and Community Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2 and 5.1-3. Refer to Master Responses 1 and 2.
O2-23	Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project's consistency with the General Plan and Community Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2 and 5.1-3. Refer to Master Responses 1 and 2.
O2-24	Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project's consistency with the General Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2. Refer to Master Responses 1 and 2.

- 02-25** Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project's consistency with the General Plan and Community Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2 and 5.1-3. Refer to **Master Responses 1** and **2**.

<p>- It is not apparent The Trails has any transitions of scale between higher and lower density development.</p>	<p>↑ O2-25 Cont.</p>
<p>Pg. 174/5 Policy UD-B.3 “Design subdivisions to respect the existing lot pattern established within neighborhoods to maintain community character.”</p>	
<p>a. Create lot divisions that respect the existing pattern of development for neighborhood continuity and compatibility.</p>	<p>O2-26</p>
<p>-The Trails project is not compatible with the existing community character. The Trails wish to infill the former golf course with 3-4 story multifamily buildings surrounded by existing 2 story single family homes</p>	
<p>A Foundation for Mixed-Use Development Already Exists in CMR Retail Centers The City’s climate action plan requires less dependence of automobile transportation. The City of Villages concept should be instituted in walkable communities. The Trails project does not meet the criteria due to the steep hills, distances to shopping, and lack access to public transportation outside of the Ted Williams/I-15 interchange. Walkable developments in CMR would be next to or part of the Retail Centers. The “neighborhoods” described in the Trails literature are normally referred to as apartment or condominium complexes. They are definitely not villages due to lack of services.</p>	<p>O2-27</p>
<p>Existing infrastructure would allow affordable units to be constructed. Four stories above retail or parking lots can be done and would create a walkable community where a car is not required. Availability of grocery, hardware, wholesale, restaurants, entertainment, pharmacy and libraries can eliminate the need for a car. Units can be constructed which time-share parking spaces with businesses, and transit options via enhanced bus service would make sense because of the increased number of possible riders. Proximity to the Retail Centers and Office/Tech/Light Industrial businesses offers a wide range of employment opportunities.</p>	
<p>Transportation</p>	
<p>VMT Mitigations Using Bicycles on Trails Ignore Shortcomings</p>	
<p>The mitigation option regarding VMT impact on transportation and circulation may not be effective in the location. On table 5.2.2 outline two measures of mitigation. An onsite bicycle repair station and 600 short-term bicycle parking spaces – There are multiple problems with this mitigation measure. The former golf course was constructed on steep hillsides making bicycle travel a challenging exercise for all but the fittest of riders. Additionally, the project’s trails are only 5-8 feet wide. Portions are to be constructed of decomposed granite.</p>	<p>O2-28</p>
<ul style="list-style-type: none"> • The Trails are likely not ADA compliant. • The gravel paths add difficulty to riding up the very steep hills. • People riding down the hills may be traveling at a high rate of speed making it dangerous for people walking. 	
<p>VMT Analysis Does Not Properly Reflect Increased Greenhouse Gas Emissions</p>	
<p>Vehicle Miles Traveled and Greenhouse Gas Emissions. One reason VMT analysis was adopted in SB 743 was to promote public health through a reduction in greenhouse gas emissions. Obviously adding</p>	<p>↓ O2-29</p>

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<p>O2-26</p>	<p>Aesthetic impacts were analyzed in Draft EIR Section 5.17, Visual Effects and Neighborhood Character, and the project’s consistency with the General Plan and Community Plan were addressed in Draft EIR Section 5.1, Land Use, Table 5.1-2 and 5.1-3. Refer to Master Responses 1 and 2.</p>
<p>O2-27</p>	<p>Comment noted. As stated throughout the Draft EIR, the project would implement the General Plan’s City of Villages strategy in an identified transit priority area and increase the capacity for transit-supportive residential densities. Impacts were thus determined to be less than significant. The comment does not raise an issue related to the adequacy of any specific section or analysis in the Draft EIR.</p>
<p>O2-28</p>	<p>Refer to Response to Comments O2-11a, O2-11b, O2-12c and Master Response 3. To clarify, the proposed mitigation comes directly from the City’s Mobility Choice Regulations (San Diego Municipal Code Section 143.1101, et seq.) The project does not propose to create hazardous or unsafe amenities for the general public as disclosed in Section 5.8, Health and Safety and Section 5.2, Transportation/<u>Circulation</u>, of the Draft EIR.</p>
<p>O2-29</p>	<p>Refer to Master Responses 3 and 8.</p>

8,282 average daily trips to this small community is not going to promote public health through a reduction of greenhouse gas emissions. The VMT figures provided bear this out: "The census tracts containing the Project (170.56, 170.55, and 170.39) have VMT/Capita of 21.7, 21.4, and 23.2, respectively. These values are between 32-43% above the VMT significance threshold of 16.2." Appendix G, Vehicle Miles Traveled Analysis, pdf page 12. These results are dramatically contrary to the City's Climate Action Plan goal of reducing greenhouse gas emissions. City of San Diego Climate Action Plan, Adopted Dec 2015, Chap. 2, Reducing Emissions. The Draft EIR and supporting Appendices are deficient in that the specific greenhouse gas emissions to be caused by the abnormal VMT levels do not appear to be quantified, and therefore the environmental impact is not appropriately analyzed. In fact, the Draft EIR, Section 5.7, Greenhouse Gas Emission, does not analyze the specific greenhouse gas emissions to be caused by the abnormal VMT levels.

Bicycle-Use Based VMT Mitigations Not Shown to be Applicable to CMR

The Developer should receive no VMT mitigation credit for bicycles, bicycle racks, and/or bicycle repair stations. The VMT mitigation effort of bicycle racks and repair stations (Draft EIR Section 5.2, pdf page 250, Table 5.2, has no factual basis in CMR. CMR is not a bicycle community, because, among other reasons, it is too hilly. Appendix C, the Local Mobility Analysis, sec.10, pdf page 85 and Figures 17a and b, shows only one intersection having High Activity of more than 10 cyclists in the AM and PM peak hours. That intersection is Ted Williams Parkway/Pomerado Road, which is not even in CMR or the City of San Diego, but in Poway, and likely few of the cyclists are CMR residents. The rest of the intersections in Figure 17 are either Medium Activity (5 intersections with 5-10 cyclists) or Low Activity (17 intersections with less than 5 cyclists) in the AM and PM peak hours. These are paltry numbers for a community of 13,287. Lacking a factual basis, the developer should receive no mitigation credit for bicycle racks or repair stations. Regarding an on-site shared bicycle fleet of 150 bicycles, Appendix G, Vehicle Miles Traveled Analysis, pdf page 14, the developer has not stated in the Draft EIR or elsewhere that it would provide these bicycles, and in any event given the low numbers of cyclists, there is no data to indicate these bicycles would actually be used in significant numbers.

Local Mobility Analysis and EIR Do Not Include Project Impacts on I-15 and SR-56

The Draft EIR and the Local Mobility Analysis (App. C) are deficient because they do not present or analyze the impact of increased traffic on relevant Interstate 15 and SR-56 segments. Interstate 15 is completely built out in this area and there is no publicly known funded or scheduled upgrade to SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical. Some of the critical segments are I-15 Northbound from Poway Road to SR-56; I-15 Northbound from SR-56 to Carmel Mountain Road; I-15 Northbound from Carmel Mountain Road to Camino Del Norte; I-15 Southbound from Camino Del Norte to Carmel Mountain Road; I-15 Southbound from Carmel Mountain Road to SR-56; I-15 Southbound from SR-56 to Poway Road; SR-56 Eastbound from Rancho Penasquitos Boulevard to I-15; and SR-56 Westbound from I-15 to Rancho Penasquitos Boulevard. The Local Mobility Analysis at pdf pages 47-70, and the entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs on these critical segments, and the Draft EIR is therefore deficient.

Transit Priority Area Designation Is Misleading Due to the Limited Routes

The TPA criteria are met technically but not practically. Only proposed Units 5 and 6 are within walking distance of the Sabre Springs/Peñasquitos Transit Station, and bus route support is limited to the Downtown San Diego employment area. There are no known future Light Rail connections planned, and the station was constructed to be a drive-to park and ride for downtown workers (where it is successful). However, buses are not provided to the Sorrento Mesa and Sorrento Valley areas where high tech and bio tech jobs exist.

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02-29
Cont.

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Refer to **Master Response 8.**

02-31

Refer to **Master Response 8.**

02-32

As stated in Section 5.2, Transportation/Circulation, of the Draft EIR, mitigation for Impact TRA-1 is through conformance with the City's Mobility Choice Regulations (San Diego Municipal Code Section 143.1101, et seq.). Those regulations require vehicle miles traveled reducing amenities or payment of an in-lieu fee depending on a project's location. The City is divided into four mobility zones. If a project is in Mobility Zones 2 or 3 then the project is required to include vehicle miles traveled reducing amenities on or adjacent to the project site. If a project is located in Mobility Zone 4, the project is required to pay an in-lieu fee that would be used to construct vehicle miles traveled reducing infrastructure in Mobility Zones 1, 2, or 3. A portion of the project is located in Mobility Zone 2, and a portion is in the Mobility Zone 4. Therefore, the project has mitigated to the extent feasible, consistent with the ordinance and as identified in Mobility Choices Program EIR. Refer to **Master Responses 2 and 3** for more information.

02-33

With regard to traffic along I-15 and SR-56, the City's TSM, which established study requirements for transportation/circulation analysis in the City, does not require the analysis of freeway segments in the LMA. Nevertheless, a freeway interchange queuing analysis was provided within the LMA (Draft EIR Appendix C) for the I-15 ramp terminal intersections along Ted Williams Parkway and Carmel Mountain

Road, for the off-ramp conditions. The LMA determined that queuing at the off-ramps from I-15 to these roadways, in both the north and southbound directions would not exceed storage capacity under the opening year (2025) and horizon year (2050) conditions.

O2-34 Refer to **Master Responses 2** and **3**.

Greenhouse Gas Emissions

Unmitigated Greenhouse Gas Emissions Violate City and State Climate Action Plans

Greenhouse Gas Emissions, will be excessive due to the project exceeding Vehicle Miles Traveled guidelines established by the State of California. The City of San Diego has adopted its own climate action plan. Leaders will need to violate both City and State guidelines to initiate the Trails at CMR development. Global warming is a scientific fact. Nations are around the world now realize the we must make significant changes to prevent catastrophe. Continue to build in area that are car dependent is no longer an option. The new development, must change and become environmental responsible.

The County of San Diego approves a Zero Carbon Plan in January of 2021. The plan known as the Regional Sustainability Plan is an effort to tackle unprecedented problems associated with Greenhouse Gas Emissions.

The Trials at CMR therefore violates, City, County and State requirements. Developments of the future need to reduce reliance on cars. This project fails at every level.

Visual Effects/Neighborhood Character

Grading Plans Are Not Consistent with Community Plan and Trails Design Guidelines

Grading, land locked, health hazard, not consistent with community plan. The CMR Community plans was designed to have all dwelling units follow the topography of the hillsides. The Trails propose to do massive amounts of grading to level hillsides to create large level pads. The plan calls for placing all buildings on one level pad. There are multiple problems with the strategy beyond community character. Large grading projects are rarely done in so close to existing houses. In many cases the units/holes are completely landlocked. The giant machinery working in the planned community will create fugitive dust from excavation that can cause emphysema, Valley fever and exacerbate COVID lung problems. To solve the problems associated with grading the project should not allow leveling of hillsides. Each building should follow the CMR Community plan by having each new building to be constructed on its own level pad. Phasing should be limited to a period of no more than two years of construction.

Health and Safety

Existing Conditions Impacts on Health and Safety

5.8.1 Physical Conditions: Analysis of issues in and around the property:

Note that the former golf course used various chemicals, herbicides, pesticides, petroleum products. **The EIR does not indicate that soil tests were done at the maintenance area and spot checked at each fairway.** Any residual contamination would create a risk of fugitive dust during grading and other phases of construction.

Pg. 404 states:

“... a single 500-gallon **underground storage tank** (UST) containing gasoline, which was installed in 1989 and removed in 1993,”**no detections were reported in soil samples collected beneath the UST and analyzed for total petroleum hydrocarbons**”

“... as well as the handling and storage of **lead-acid batteries** at the project site in 2017”

O2-35

O2-36

O2-37

O2-38

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O2-41

O2-35

Refer to **Response to Comments O1-28** through **O1-42**. Also refer to **Master Response 8** for further information.

O2-36

As outlined in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR and **Master Response 8**, the proposed project does not violate City or State guidelines related to greenhouse gas emissions.

O2-37

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. Nor does the comment relate to an issue that falls within the City's jurisdiction.

O2-38

As explained in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR and **Master Response 8**, the proposed project does not violate City or State guidelines related to greenhouse gas emissions.

O2-39

Refer to **Master Responses 1, 2 and 7**.

O2-40

As stated in Section 5.8, Health and Safety, the project would be required to comply with the County of San Diego Department of Environmental Health (DEH) Voluntary Assistance Program (VAP) as a condition of project approval. The VAP provides for consultation, project oversight, and technical/environmental report evaluation. This process includes the preparation and review of a Soil Sampling Plan and Hazardous Materials Contingency Plan. The Soil Sampling Plan and Hazardous Materials Contingency Plan would address any potentially contaminated soils during demolition or grading activities in focused areas. These reports routinely accompany efforts

where any prior controlled use is identified on site, and would contain worker health and safety controls, soils excavation and monitoring, management of any identified contaminated or potentially contaminated materials, and on-site reuse or (if required) off-site disposal. Based on this process, the Draft EIR concluded that the project would not expose people to toxic substances or result in hazardous emissions. Also refer to **Master Response 7**. Specific to the issue of the pedestrian tunnels, the analysis for General Plan Policy UD-A.13 included in Draft EIR Table 5.1-3 explained that, the project would incorporate safety lighting throughout the project site for security purposes. Public spaces (i.e., privately owned recreation amenities with a Recreation Easement recorded over them) would also be clearly marked and would be open for public use during designated hours. However, pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours.

O2-41

As stated in Section 5.8, Health and Safety, two soil samples were collected, neither of which contained detectable TPH (method detection limit [MDL] of 10 milligrams per kilogram), BTEX (MDL of 0.05 milligrams per kilogram), or methyl tert-butyl ether (MTBE) (MDL of 0.05 milligrams per kilogram). One of the two soil samples was analyzed for VOCs; minor detections of 1,1-DCE (1.2 milligrams per kilogram) and toluene (4.1 milligrams per kilogram) were detected. Reportedly, water was observed seeping into the UST and secondary containment structure; however, this was attributed to heavy irrigation of the golf course. Groundwater was not noted during the UST decommissioning activities. This information was compared to current closure requirements for LUST sites (DTSC 2012). According to this guidance, the LUST

“... The Carmel Mountain Ranch Country Club listing refers to the handling and disposal of 1.0425 tons of “unspecified oil-containing waste” in 1998” “likely in reference to the grease trap and two stage clarifier observed during their site visit.”

“... One additional soil sample was also analyzed for TPH; volatile organic compounds (VOCs); benzene, toluene, ethylbenzene, and xylenes (BTEX); and total recoverable petroleum hydrocarbons (TRPH). **Minor detections of 1,1-dichloroethene (DCE) at 1.2 milligrams per kilogram (mg/kg) and toluene at 4.1 mg/kg were reported.** The DEH Site Assessment and Mitigation (SAM) Program reviewed the soil analytical results and determined that no further action was required.”

“Further, the phase I ESA noted the presence of a two-stage clarifier on the project site, located to the east of the clubhouse, related to the former electric golf cart wash area. Although there are no reported issues or violations associated with the clarifier, **the existing clarifier could result in soil contamination at the project site.**”

The EIR does not explain what steps were taken to ensure public safety. Specifically if the soil has been tested or not? If not why what was the reason to believe there would not be a risk of dust contamination during construction?

Pesticide Contamination Risk
Pg. 405 states: “a recognized environmental condition (REC)...”

“The ongoing pesticide application on the site leading to accumulated residual pesticides in soils would be considered a REC.”

Again, the EIR fails to state if each fairway spot was checked for chemical residue in the soil (to what depth?) for herbicides, pesticides etc? These will become airborne during excavation and grading and there did not appear to be a reference to this possibility in the Air Quality Section.

Safety and Privacy Issues Caused by Opening Trails to Public Access
Safety and privacy problems are caused by opening the trail system in the development. Currently, the closed golf course is separated from single family homes by a bar style slotted metal fence. The purpose of the fence was to provide views to the golf course. Once complete the trail system will be open to the public. These fences will allow views into the golf course frontage homes at night. As a private area that has not been a concern for residents. Once open the public it provides a perfect opportunity for criminals to observe residents, track their patterns and rob their homes. New fencing must be provided by the developer to protect homeowners.

Underpass Tunnels Will Likely Present Serious Safety Issues
It is likely that even during daylight hours these tunnels will prove to be an attractive nuisance. That is, they may attract the homeless as they have done even when the golf course was operational. The possible risks for pedestrians and casual bicycle riders is certainly much different from what it was for golfers in relatively fast-moving electric golf carts. During course operation the CMR Country Club staff regularly traveled the entire course and there were posted no trespassing signs. As a public walkway it will be much less regulated, and lighting alone will certainly not ensure a safe and clean environment.

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O2-41
Cont.

O2-42

O2-43

O2-44

site meets the current requirements for low-threat closure with Department of Toxic Substances Control (DTSC), and the site does not pose a significant risk of adversely affecting human health (DTSC 2012, Table 1). The guidance also states that vapor intrusion from soil contamination is not a significant risk if low-threat closure criteria are met, and if TPH concentrations are less than 100 milligrams per kilogram. The detected concentrations of 1,1-DCE and toluene are well below residential-risk-based concentrations for direct contact to soil. Based on current regulatory screening levels and guidance, low detections of contaminants of concern, lack of apparent impacted groundwater, and the fact that the LUST was removed more than 20 years ago, it is not anticipated that vapor intrusion poses a potential impact to the project.

As further discussed in Section 5.8, the project would comply with all federal, state, and local regulations and requirements and would decommission the clarifier subject to all federal, state, and local regulations and therefore impacts were determined to be less than significant. Refer to **Response to Comment O2-40 and Master Response 7.**

O2-42 Refer to **Response to Comment O2-41.**

O2-43 Refer to **Response to Comment O2-7.**

O2-44 Refer to **Response to Comment O2-7.**

Public Safety Issues Presented by Tunnels Are Not Addressed

When evaluating the Project's Consistency with City of San Diego's General Plan (Table 5.1.2 (EIR Pg. 170)) **Urban Design Element Policy UD-A.17, the Safety of the Tunnels is not addressed. The General Plan Goal/Recommendation is:** "Incorporate crime prevention through environmental design measures, as necessary, to reduce incidences of fear and crime, and design safer environments."

- a. Design projects to encourage visible space and "eyes on the street" security that will serve as a means to discourage and deter crime through the location of physical features, activities, and people to maximize visibility.

The analysis for this section does not address the safety impact of the 5 pedestrian tunnels.

The developer wishes to use the golf cart tunnels as pedestrian tunnels for The Trails project. When the golf course was in operation, the tunnels were only used by golf course patrons and maintenance personnel in golf carts. The entire golf course and tunnels were patrolled daily by golf course maintenance personnel with a drive-through being conducted before it's nightly closure. It is assumed no such oversight will be implemented for the Trails at CMR.

Keeping the golf cart tunnels open and used by pedestrians exposes users to the potential of physical harm.

1. Pedestrians will be out of the public view while walking down large embankments as the sidewalk lowers in elevation to allow access under the roads. The tunnels are not short well-lit pathways, they are actual tunnels with fully-enclosed areas as long as 185 feet passing under Ted Williams Parkway, others are 130 to 150 feet long.
2. Having large parts of the walkway out of view from the public can encourage antisocial behavior such as littering, graffiti, drinking or drug use, loitering and crime.
3. Litter and nuisance issues could evolve from people that are homeless attempting to use the tunnels as temporary or permanent shelters.
4. Pedestrians could be robbed or physically or sexually assaulted during their descent into and through the tunnels.
5. The organization taking responsibility for the ownership and maintenance of the tunnels could be exposed to lawsuits for encouraging the public to use a facility that increase their potential for harm.

To mitigate this hazard a suggestion would be to infill the tunnels and access sidewalks with excavation dirt to grade level and then landscape with native plants. The trail connectivity would not be affected by infilling the tunnels as 4 out of the 5 tunnels are at intersections controlled by traffic lights. Sidewalk "go arounds" can easily be constructed from the trails to the traffic light controlled pedestrian crossings. The fifth tunnel connecting units 5 and 6, can also be infilled the trail appears to go along the southern border of unit 5 and exits onto the sidewalk on Rancho Carmel Drive about 100 feet north of the signalized intersection of Provencal Place in Rancho Carmel Drive.

Infilling tunnels and subterranean spaces is not uncommon. There are companies specifically geared to infilling small areas such as former swimming pools to large industrial projects that have been abandoned thus reducing the public's exposure to danger and the owner to liability.

O2-45

O2-46

O2-47

O2-45 Refer to **Response to Comment O2-7.**

O2-46 Refer to **Response to Comment O2-7.**

O2-47 Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

Biological Resources

Project Consistency with Conservation Element of SD City General Plan

Pg. 210 G. Biological Diversity: The developer says, “**The project would retain the majority of the 164.5- acre project site as open space.** Specifically, open space uses would be composed of approximately 111.27 acres.”

- The community would lose over 50 acres of Open Space they have enjoyed and was planned as an integral part of the community.
- Wildlife that has moved un-hindered through the property would now be forced into narrow corridors which will change the dynamics of species interactions. In many locations only the 15 foot width of the 50-foot buffer zone will actually be free from paved encroachments, as compared with 150 to 300 foot planted widths previously.

Historical Resources

Trails Project Does Not Maintain Character & Identity of CMR

The San Diego General Plan Historic Preservation Element, (EIR Pg. 116) - “encourage appreciation for the City’s history and culture, maintain the character and identity of communities...” **The project does not maintain the character of Carmel Mountain Ranch** due to density and scale.

Population and Housing

Affordable Housing Will Not Offer Ownership Opportunities

Will the development result in affordable housing? Some limited deed restricted but vast majority will not be affordable and most will be rental. Housing projects should be affordable and offer opportunity for purchase instead of rental. San Diego has abundant expensive housing. There is not a need for more expensive housing. Rather, the focus should be on creating affordable housing. Ideally, for purchase instead of the endless cycle of renting.

Affordable housing could be constructed in Carmel Mountain Ranch. Developers should use retail and office space as future affordable housing opportunity. Amazon and COVID are reshaping commercial developments. There are and will be many vacancies in both types of property. Affordable housing can be achieved by using existing infrastructure, parking, roads, utilities are already in place thereby reducing costs.

EIR Incorrectly Minimizes the Impacts of the Project Building Heights

Section 5.1.3 Impacts Analysis, Issue 2: Impact of deviations: (EIR Pg. 121)

EIR analysis incorrectly states “In the instances where maximum building height is greater than 40 feet, it is likely that differences in grade and topography would not result in a substantial visible difference between existing and proposed development. Similarly, variations in lot area,

O2-48

O2-49a

O2-49b

O2-50

O2-51

O2-52

O2-53

O2-48

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

O2-49a

Refer to **Response to Comment O2-11a**.

O2-49b

Impacts to wildlife corridors were assessed within Section 5.4, Biological Resources, of the Draft EIR. The analysis determined that the project site is not located within a designated key biological core or linkage area. The project site is disturbed and surrounded by residential development and therefore does not serve as a wildlife movement area or habitat linkage. Further, the existing native habitat is bounded by development and therefore wildlife movement is already restricted. Direct and indirect impacts associated with wildlife movement and/or corridors were determined to be less than significant.

O2-50

Refer to **Master Responses 1 and 2**.

O2-51

The project would be required to comply with San Diego Municipal Code Section 142.1304, Inclusionary Affordable Housing Regulations, which requires the project to provide ten percent of the units on site as affordable. The project proposes to include 180 affordable apartments.

O2-52

Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.

O2-53

Refer to **Response to Comments O2-3c, O2-3d, and Master Responses 1 and 2**.

setback, width, depth, and frontage would not result in development that is substantially visibly different from the surrounding community”

- **The project would be substantially different than existing community.** Based on elevations shown in the Vesting Tentative Map set, most of the graded building pads are close in elevation to adjacent existing homes. The golf course is surrounded by 2 story single family homes whereas The Trails are 100% multi-family units, 3-4 stories in height with greater heights and densities than the surrounding existing development.

The EIR also states “Further, per California Public Resources Code Section 20199 (d)(1), aesthetic impacts resulting from a residential project on an infill site within a Transit Priority Area are not considered significant” and incorrectly concludes that “As deviations requested would not affect any other environmental issue or sensitive resource, it would not result in a physical impact on the environment.” This is wrong because:

- Impact of the requested deviations encompass more than aesthetic issues. While aesthetics addresses whether a project is “liked” from a design standpoint, the height, bulk, and locations of some projects would impact adjoining homes in several other ways: Increased heat-trapping by replacing large areas of grass, dirt, and plants with concrete, stucco, and asphalt; disruption of cooling wind patterns, especially by unit 9, which would sit at the highest point of CMR, and block prevailing west wind which currently cools homes directly to the east of that site. Street traffic along Carmel Ridge Road will be substantially increased by residents of units 9 and 10, while the buildings of unit 9 will reflect that noise back towards the homes on the east side of the street.

Addition of 1,200 New Housing Units Substantially Impacts the Community

- EIR Section ES.3 Objective 1: “Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.”
- CEQA states that development must not violate the character of the general plan.

The local residential communities as evidenced by the CMR community plan are as follows:

1. Population The 5,039 residential units are estimated to generate a population of approximately 12,000 persons. This number was projected from SANDAG’s population figures extracted from the federal 1990 census data. An average of 2.35 persons are anticipated for each dwelling unit within Carmel Mountain Ranch.

2. Community Balance A balanced community encompasses a variety of housing types related to acreage/density numbers. A wide range of densities with creative site planning will provide a broad economic offering within the community. The extent to which this will achieve the goals of City Council Policy 600-19 will be dependent upon final approval of densities and housing types. To meet the City’s proposed mobile home enabling legislation, 108 mobile home units have been incorporated into the Plan. This housing falls in the category of low-medium density at 7.6 units per acre. It will respond to a demand for affordable housing.

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O2-54

Deviations are permitted per City regulations (Land Development Code Section 143.0410(a)) and no secondary physical impacts would result due to the deviations. Impacts as a result of deviations were addressed in Draft EIR Section 5.1, Land Use. Impacts were determined to be less than significant. Regarding heat trapping, the project would comply with setbacks and building articulation which would allow for proper airflow.

O2-55

Section 5.2, Transportation/Circulation, of the Draft EIR disclosed that the project would result in significant transportation/circulation impacts. The project would implement vehicle miles traveled reducing mitigation measures consistent with the City’s Mobility Choices Program; however, impacts would remain significant and unavoidable. The City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project.

As discussed in Section 5.11, Noise, of the Draft EIR, the additional vehicular traffic associated with the project would result in a less than 3 A-weighted decibel (dBA) increase; therefore, impacts were determined to be less than significant. Refer to **Master Response 4**. Regarding noise reflectivity, traffic noise sources

O2-53
Cont.

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O2-57

reflected off of structures adjacent to the noise source, such as noise barriers of substantial length, typically result in noise level increases on the opposite side of the right-of-way of less than 1 to 2 dBA. Reflections from smaller structures more limited in total length, are further reduced by levels correlating to the reduction in reflective surface. Noise levels generated by the direct noise exposure to the traffic noise source generally mask the sound from the reflection of the same traffic source (Caltrans 2013).

- O2-56** CEQA Guidelines, Appendix G, directs lead agencies to consider whether a proposed project would conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The necessary analysis is included in Section 5.1, Land Use, of the Draft EIR. Refer to **Response to Comments 02-3c and 02-3d**, as well as **Master Responses 1 and 2**.
- O2-57** Comment noted. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. No further response is required.

RECREATION AND OPEN SPACE

(Table 3, CMR Community Plan Updated 9/29/2020)

	Unit Number	Gross Acres	Net Acres	Percent of Total Community Acres
Public Parks				1.7%
Neighborhood	55	4.8	4.0	
Community	50	18.3	13.0	
Pool	52	2.4	2.4	
Private Recreation	33	2.3		0.2%
SDG&E Easement		34.0		2.3%
Golf Course & Driving Range	60A, 60B		175.0	11.8%
Natural Open Space	61	101.3		6.8%
Major Open Space		12.5		0.8%
Slopes				
Totals		348.5	19.4	23.6%

Presently the community is made up on the following housing types:

(Table 2, CMR Community Plan Updated 9/29/2020)

Low-Density	0-5 DU/GA	559	11%
Mobile Homes	6-8 DU/GA	108	2%
Low-Medium Density	6-29 DU/GA	3,059	60%
Medium-Density	30-43 DU/GA	1,263	26%
Very High Density	75-109 DU/GA	50	1%
Total Dwelling Units		5,039	100%

The subtraction of the 175 acres of the former golf course to be replaced by 1,200 multi-family units changes the dynamics of the community.

- The addition of 1,200 multi-family unit doubles the number of medium density units. Therefore, the project does not meet one of its specific objectives. It seeks to disrupt the balance of housing types.
- Length of phasing could result in noise, pollution, construction for a very long timeframe from 5-10 years. The grading equipment will damage the environment, roads, noise to a community of 12,000 people.
- Open space lost, community is under parked, 9 new acres of parks with no space for organized sports such as ball fields, pickle ball, basketball for 3,000 new residents. The community had too few parks before the development based on City guidelines. When the community was built, an exception was made to the large open space provided by the golf course. Remember, we are not adding open space in the area we are only facing a net loss. In our case 11 of the former 18 holes are to be developed resulting in a net loss of open space of 61%.
- Topography was to be preserved as part of the Community Plan; view corridors are protected by constructing buildings that follow the counter of the hillsides. The Community Plan in the Parks and Open Space element speaks of the following: Incorporation of the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a

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O2-58 Refer to **Response to Comment O2-11a**.

O2-59 The project would include, row townhomes, stacked flats, garden apartments, and clustered townhomes, thus the project would add to the balance of multi-family housing unit types within the community. In addition, the project is proposing a Community Plan Amendment and impacts have been analyzed consistent with CEQA. Refer to **Master Response 1**.

O2-60 As stated in Section 5.11, Noise, of the Draft EIR, impacts from construction would be reduced to below a level of significance with mitigation measures. Refer to **Master Response 4**.

As discussed in Section 5.3, Air Quality and Odor, impacts from construction pollution would be less than significant. Also refer to **Master Response 7**.

Regarding the damage to roads, the applicant would be required to restore the intersections and/or road segments assured through pursuant to project conditions of approval.

Regarding impacts to the environment, the Draft EIR has been prepared in accordance with the appropriate criteria, standards, and procedures of CEQA and the State CEQA Guidelines. As described in the environmental document, the Draft EIR identified the significant effects caused by the project and appropriate mitigation measures, where feasible.

O2-61 Refer to **Response to Comment O2-11a** regarding open space and **Master Response 3** regarding parking.

<p>coherent whole, linkage of open space and public parks into a continuous network of bike paths and pedestrian trails where it can be done in a manner sensitive to the topography and landforms traversed, retention of open space acreage for views easements, noise buffers or preservation of natural, irreplaceable environments. The Trails at CMR devastates the Community plan, the topography, the open space and the community character as protected by CEQA.</p>	<p>O2-62 Cont.</p>	<p>O2-62</p>	<p>Refer to Master Response 1 and 2.</p>
<ul style="list-style-type: none"> • AR1-1 is the zoning according to the community plan but in the SD General plan it is identified as Parks and Recreation. City's Climate Action plan requires additional park and recreation spaces. The City should not allow destruction of Park and Recreation space. There are many opportunities to add affordable housing without destroying park and recreation space. We should look to retail shopping existing retail shopping centers that will continue to see vacancies due to the explosion of online shopping and the closure of brick and mortar retail. 	<p>O2-63</p>	<p>O2-63</p>	<p>The General Plan provides land use designations, not zoning designations. The project applicant seeks a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation to change the current designation and zone and permit the development of the site. Refer to Master Response 1. Further, the project is consistent with the City's Climate Action Plan. Refer to Master Response 8.</p>
<ul style="list-style-type: none"> • Library impact, offering a community pottery art building is inadequate we need to more library space. The offering of an arts center in exchange for massive environmental damage. 	<p>O2-64</p>	<p>O2-64</p>	<p>Refer To Master Response 6.</p>
<ul style="list-style-type: none"> • The concept of calculating open space is flawed. Project is 167 acres. Developer calculates that they will construct buildings on 51 acres. They state that 2/3rds of the property will remain open space. That statement is misleading. In fact they only count building footprints as development. They plan to construct many, many buildings on 11 of the 18 holes. We contend that each hole that is built upon should remove that hole from consideration of open space. If that were the case the calculation of lost open space is 61%. Further each hole/unit will have many many buildings. An example would be unit 6. The plan is to construct 78 apartments on 2.3 acres of the 7 available acres. If they were to build 10 buildings, 48 feet high spread across the 7 acres how can they contend that 5 acres of open space is left? In reality, the seven acre unit will be entirely covered with buildings, roads, parking. 	<p>O2-65</p>	<p>O2-65</p>	<p>Refer to Response to Comments O2-11a, and O5-3.</p>
<p>Wildfire</p> <p>Fire Evacuation Analysis Does Not Fully Reflect Project Impacts</p> <p>The Draft EIR's treatment of fire evacuation ignores historical data. The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Nowhere in the basic treatment of fire evacuation re the community itself (pdf page 603, 5.19 Wildfire; PDF pages 613-18, 5.19.3 Impacts Analysis. Issues 1-3), or considered with cumulative impacts of adjacent communities (PDF page 637, 6.1.19 Wildfire) are evacuation times even mentioned. Appendix D, Fire Fuel Load Modeling Report, is similarly deficient. The Draft EIR does acknowledge that "Typically, the highest fire danger is produced by the high-pressure systems that occur in the Great Basin which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 mph and may exceed 50 mph during extreme conditions." The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. There are recent high wind-driven ember fires, with mass evacuations ordered, and clogged evacuation routes. This data must be presented and considered along with the additional impact of 3,180 additional residents and their vehicles. It is not enough to simply state, as the Draft EIR does, that the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired (pdf page 613-4), or that "For emergency evacuation, the EOP identifies I-15 and SR-56 as emergency evacuation routes in the vicinity of the project site. Portions of the project</p>	<p>O2-66</p>	<p>O2-66</p>	<p>Refer to Master Response 5 for a discussion pertaining to fire response, evacuations and fire safety. In accordance with the CEQA Guidelines, impacts related to public services and facilities (police, fire- rescue, and libraries) are evaluated in light of whether the impact would result in a physical change to the environment. Response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the budget proposal for operations of the affected departments within the affected area because individual development projects cannot be required to fund ongoing operational costs nor can individual development projects make budgetary decisions regarding such funding. As discussed in Section 5.14 of the Draft EIR, the project would not result in an increased demand for facilities associated with police, fire rescue or <u>libraries, parks and recreation</u></p>

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site are located adjacent to I-15 to the east and to the northeast of SR-56. Per the VMT Analysis (Appendix G to this EIR), the proposed project is anticipated to add 7,928 average daily trips to and from the project site." (pdf p 613), without further data or analysis. The County EOP in fact in Annex Q, Evacuation, p. 16, provides a formula for determining evacuation times. The recent high wind-driven ember fires and CMR evacuation issues should have been studied and should have produced data available to the City and developer. The Draft EIR needs to get this data or produce it if it has not been compiled, and add the additional impact of 3,180 additional residents and their vehicles to determine the true threat to the community of this massive project.

O2-66
Cont.

O2-67

through either the provision of new or physically altered facilities.

Refer to **Master Response 10** for further information regarding alternatives, specifically as to why an additional reduced-density alternative was not considered within the EIR.

Project Alternatives

Project Alternatives Should Include a Low-Unit-Count Option

Four Project Options, 1,200 units, 825 Units, Change of Footprint, No Project – The 1,200 and 825 unit and Change in footprint options result in a significant unmitigable impact on transportation/circulation, public service, and population and housing. Suggest that there be an additional option where the significant impacts can be mitigated. A 250 unit option would likely result in a good compromise.

O2-67

O2-68

Refer to **Master Response 10**. No revisions to the Draft EIR are required.

Project Reduced Density Option Draws Invalid Conclusion

Reduced Density option comes to the conclusion that since the 825 unit option would not solve the significant and unavoidable impacts it makes sense to not consider this option due to the "slight" reduction in reduced population, housing and traffic and transportation impacts. That conclusion is faulty. In fact, the reduced option would reduce the population from 3,180 people to 2,186. That represents a 31.4% reduction. By any measure that should not be considered slight. Further if the 825 unit option does not improve impacts would it not make more sense to evaluate options somewhere between 0 and 825 units?

O2-68

O2-69

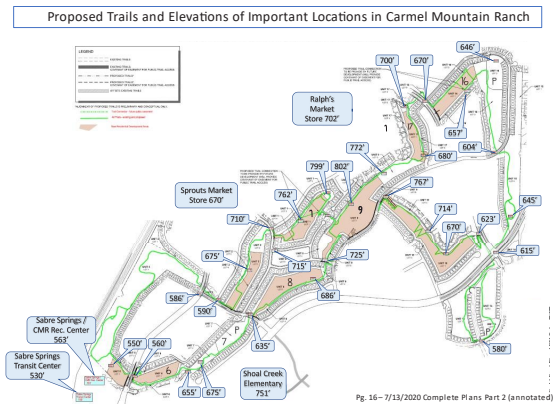
As noted in Chapter 8 of the Draft EIR, an off-site location alternative was considered but rejected from analysis because the applicant does not have ownership of any similarly sized land in the project area or within the City's boundaries. The applicant cannot reasonably acquire, control, or otherwise have access to other sites in the area, such as the surrounding shopping centers. Thus, the off-site alternative was rejected from further analysis. Refer to **Master Response 10**.

Mixed-Use Development in Shopping Centers Is Not Addressed as an Alternative

There are alternatives for housing in areas that are already developed for commercial use. Due to factors such as online shopping, increasing COVID-caused work-from-home impacts, and higher vacancies in retail and office space there are increasing opportunities for mixed-use developments.

O2-69

Appendices
Appendix A – Carmel Mountain Ranch Elevation Map



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O2-70 The comment does not raise an issue with the adequacy of the analysis contained within the Draft EIR. No revisions to the Draft EIR are required.

O2-70

Comment Letter O3

Carmel Mountain Ranch/Sabre Springs Community Council
 Attention: E. Shearer-Nguyen, Environmental Planner
 City of San Diego Development Services Center
 1222 1st Avenue, MS 501, San Diego, CA 92101,
 Project Name: Trails at Carmel Mountain Ranch
 Project No. 652519 / SCH No. 2020039006
 Community Plan Area: Carmel Mountain Ranch
 Council District: 5

February 3, 2021

To City of San Diego, E. Shearer-Nguyen, et al,

This letter is submitted on behalf of the Carmel Mountain Ranch/Sabre Springs Community Council in response to the proposed Trails at Carmel Mountain Ranch Draft Environmental Impact Report.

We would like to thank the Development Services Department for the hard work on this Draft Environmental Impact Report (EIR) given the challenges of Covid-19, numerous other city projects, and limited information provided by the developer New Urban West (NUW). The Carmel Mountain Ranch/Sabre Springs Community Council (CMR/SS CC) is supportive of the city's goal to address the housing inequity that exists in San Diego. At the same time, the CMR/SS CC desires that any major project like the Trails in Carmel Mountain Ranch is able to provide current and future residents a neighborhood that accommodates projected community, housing, and technology trends in the next 30 years.

After careful review of the Draft EIR, we find several fairly significant issues, some of which are highlighted below:

- Four significant projects with over 1000+ daily trips not included in cumulative impacts and analysis
- Alternatives that provide potential options that meet or exceed Trails @ CMR project objectives not considered
- CMR/SS CC concerns regarding community character and compatibility not addressed
- No wildfire evacuation plan updates or detailed impacts to evacuation times provided
- Community parks deficit increases from 19.97 acres to 20.98 acres and no expansion of library space that is already below the city's recommended 15,000 sq ft
- Freeway impact analysis not conducted although peak hour trips likely exceeds 150 trips/hour
- Wildlife and plant diversity, population, and habitat have increased markedly since August 2019 survey and EIR analysis may be outdated

A full list of our 44 issues and recommendations is attached in the following pages.

The CMR/SS CC strongly urges the Development Services Department & the City of San Diego to address the numerous issues, concerns, and recommendations identified. As there are significant impacts from our comments, the CMR/SS CC also requests that an updated Draft EIR be re-circulated.

Thank You for your consideration of the CMR/SS CC's concerns.

Sincerely,
 CMR/SS CC



Eric Edelman - Chairperson

Response to Comment Letter O3
3 Carmel Mountain Ranch/Sabre Springs Community Council
(Eric Edelman)
February 3, 2021

O3-1 The comment is an introduction to the comments that follow. Refer to **Response to Comment O1-66**.

O3-1

Topic Area	Issue	Comment
Affordability	Policy HE 8.5 Emphasize the provision of affordable housing in proximity to emerging job opportunities throughout the City of San Diego.	Project does not include deed-restricted affordable-for-sale units. EIR should indicate that project is only partially consistent with Policy HE 8.5.
Affordability	Affordable Housing does not include deed-restricted for sale	Project of this size and scope should be required to include deed-restricted affordable-for-sale units > = 5% of project unit total EIR should investigate options to increase the number of units that are deed-restricted for sale. EIR should be updated to include following projects as any project along SR-56 will likely cause East/West traffic along Ted Williams Parkway. Without adding these cumulative projects, this EIR is deficient.
All	Cumulative Projects are missing significant projects in local area	Millennium PQ (June 2019) 331 units #64431 Merge 56 Aperture Del Mar Preserve at Torrey Highlands
Alternatives	Reduced Density Alternative eliminates residences in Units 5 and 6 and doesn't meet 3 criteria items.	It is confusing that the selection of alternatives chosen in this EIR is governed by a so-called "rule of reason" (required to evaluate only those alternatives necessary to permit a reasoned choice). EIR needs to provide a more appropriate and reasonable alternative that seeks to effectively mitigate the impacts and blend better with the community plan and existing development. This is especially true since the focus of this analysis is to determine 3 items (1) whether the alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of the alternatives, and (3) whether the alternatives meet all or most of the basic project objectives. EIR should be updated to include a Low Density alternative, comparable to other North County San Diego golf course redevelopments, while retaining Units 5 & 6 for development near the TPA.
Alternatives	Reduced Density Alternative. Other Project Alternatives: In addition to a No Project Alternative, the EIR shall consider other alternatives that are determined through the environmental review process that would mitigate potentially significant environmental impacts. These alternatives must be discussed and/or defined with EAS staff prior to including them in the EIR.	Reduced density alternative only analyzes 1 limited option. Investigate a potential option of 200 to 250 total 2-story single family detached and 2-story mixed units detached to reduce the number of impacts being made to community. This potential option is similar golf course infill projects such as Stoneridge Country Club, Poway, an agriculturally themed development of 150 units, a racquet club with two pools, meeting spaces and a 100-foot buffer from existing homes on three sides; and Escondido Golf Course - Three "villages" with 380 units, including 188 condos, constructed in two-story buildings in a neighborhood of single-family homes. Almost half the 109 acres are to be classified as open space, with landscaped buffer zones of between 50 and 200 feet between the new units and the existing houses built around the former golf course. EIR should be updated to include a Low Density alternative of 200 to 250 total 2-story single family detached and 2-story mixed units detached, comparable to other North County San Diego golf course redevelopments. This alternative would also be able to address the park space deficiency in CMR.

O3-2
O3-3
O3-4
O3-5
O3-6

O3-2

Refer to **Master Response 1.**

O3-3

Refer to **Master Response 1.**

O3-4

The four development projects would only be applicable to a level of service analysis, which was completed under the LMA. However, Level of Service traffic analysis is no longer required under CEQA, with the implementation of SB 743, which now requires CEQA traffic impacts to be analyzed using vehicle miles traveled as the performance metric. As to the projects analyzed in Chapter 6 of the Draft EIR, the City determined which projects to include in the cumulative projects list for Opening Year 2025 analysis based on project location and stage within the development process. The Local Mobility Analysis (Draft EIR Appendix C) was performed per the City's Transportation Study Manual and through the project information form/ scoping process with the City of San Diego.

O3-5

Refer to **Master Response 10.**

O3-6

Refer to **Master Response 10** and **Response to Comment O2-11a.**

Topic Area	Issue	Comment
Alternatives	Environmentally Superior Alternative only proposes "No Project Alternative"	<p>The proposed no project alternative does not meet project objectives and fails to investigate better alternatives.</p> <p>The best environmentally superior alternative would be to concentrate high density multi-story housing at the town center along Carmel Mountain Road and Units 5 & 6 near the TPA. The existing commercial zone should be re-zoned as multi-use and tall buildings (5-6 story) could be added without significant impact to surrounding residents. This plan could add more than 2000 residential units with less overall impact and meet/exceed the baseline project in all 7 project objectives identified in Section 3.2.</p> <p>(Obj 1) Multi-family housing would be concentrated near the TPA (Units 5 & 6) and in the town center along Carmel Mountain Road. Units 5 & 6 would retain the 206 proposed units.</p> <p>(Obj 2) 2000+ housing units providing a mix of housing for residents, with at least 200 units designated as affordable rentals and 200 units designated deed-restricted for sale.</p> <p>(Obj 3) Reduce development on ex-golf course units by > 50%. Only develop 4 units (vs. 9 baseline) and reduce impact to community with single family residences or 2 story townhomes.</p> <p>(Obj 4) Retain larger majority of ex-golf course for open space and parks. Reducing 4 units could increase open space by 20 acres.</p> <p>(Obj 5) Increase park acreage by 20.98 acres (total 27.88 acres) to address CMR park deficit. Increase size of library to meet city recommendations.</p> <p>(Obj 6) Retain proposed trail system and ensure it meets ADA and city bike path requirements.</p> <p>(Obj 7) Proposed would meet or exceed baseline for community plan compatibility.</p> <p>(Obj Climate & Transport) Proposed project would provide better access to public transit, lower the Vehicle Miles Traveled (VMT), and reduce the Local Mobility impact. Overall lower impact in Greenhouse Gas Emissions. Alternative proposed could potentially generate VMT per capita 15% below the regional average.</p> <p>The EIR should consider this alternative as the Environmentally Superior Alternative.</p>
Biological Resources	In the Biological Resources, section 5.4, it was mentioned that of the total 18 wildlife species observed during the reconnaissance survey done in July of 2019, 1 special-status and MSCP-covered species was observed: the coastal California gnatcatcher (<i>Poliopelia californica</i>). However, besides the reoccurring gnatcatcher, a nesting pair of Coopers Hawks have been present in the upper ridgepine homes (units 1, 9, 10 and 18) have been over present for the last 5-6 years and seen on a regular basis throughout these units as well as the community.	<p>The Cooper's hawk is a state Watch List and a MSCP Covered species. It is also protected by the Federal Endangered Species Act and the Migratory Bird Treaty Act. The Migratory Bird Treaty Act prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, "take" is defined as "pursue, hunt, shoot, wound, kill trap, capture, or collect, or any attempt to carry out these activities" (16 USC 703 et seq.). According to the California ESA establishes state policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Under the California ESA, CDFW is responsible for maintaining a list of threatened species and endangered species (California Fish and Game Code, Section 2070). A number of animals have steadily increased over the last 3 years since the course has closed and wildlife has been an amazing resource that should be protected. The Cooper's Hawk should be protected and their locations are not listed in the EIR. In addition, wildlife and plant species and population have greatly increased since the golf course has closed. The last survey was conducted in August 2019.</p> <p>The EIR should be updated to include these birds and any others species that are MSCP-covered.</p> <p>The EIR should conduct additional biological surveys within 6 months of the final EIR to ensure proper mitigation of wildlife and plants during the project development.</p>

O3-7

O3-8

O3-7

Refer to **Master Response 10.**

O3-8

The analysis concluded that the project would result in a potential significant impact if construction occurred during the Cooper's hawk breeding season. Thus, mitigation measure MM-BIO-1 was included to ensure impacts to special-status wildlife species would be reduced to a less than significant level. Refer to **Response to Comment S2-21**. The Draft EIR identified MSCP covered species that have the potential to occur on the project site.

Topic Area	Issue	Comment
Biological Resources	These Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals. Wildlife corridors contribute to population viability by (1) assuring the continual exchange of genes between populations, which helps maintain genetic diversity; (2) providing access to adjacent habitat areas, representing additional territory for foraging and mating; (3) allowing for a greater carrying capacity; and (4) providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes (e.g., fires).	In the report (p. 27), it mentions that Chicarita Creek provides wildlife habitat and may support wildlife species movement; however, the upper limit of the creek and its associated habitat ends at the project site's northern boundary and therefore this part of the project site would be a dead end for wildlife movement. Wildlife could move between the habitat along the eastern boundary of the project site and the adjacent land just east of the project site. However this natural habitat is bounded on all sides by roads and residential development and therefore movement would be restricted. This is not a true statement as for the last 35 years, the golf course/open space has served as a wildlife corridor for over 35 years for all kinds of animals and birdlife. Previous EIR studies also indicated that the golf course was intended to be a wildlife corridor as the outlet of its planning. All of the golf course's 650 residents have seen and heard numerous wildlife including coyotes, wild birds, possums, and reptiles living and moving through the once green and now ignored fairways that channel through the community of CMR. The EIR needs to investigate how the project will impact the wildlife corridors and whether additional mitigation is required to preserve these corridors.
Fire Risk and Evacuation	The proposed development is in a very high fire zone with over 55 fires in the last century and 2 in recent years.	The EIR fails to adequately analyze the fire risk combined with the evacuation times along the SR-56 and I-15 corridors. The cumulative effect of the infill projects was not analyzed. SR-56 is not wide enough to accommodate current residents and cannot handle the population increase 1200 additional units will add. The EIR should be updated to analyze the project impact of adding 1200 units to the cumulative impact of regional projects to the Emergency Operations Plan especially with regard to I-15 and SR-56 evacuation routes.
Fire Risk and Evacuation	Evacuation Capacity	5.19.3 indicates no impact to the evacuation plan, but none is offered. What is the evacuation plan and how does it address the increased capacity (1,200 multi-family residential units and 3000+ additional residents) on an already bad wildfire evacuation situation? Section indicates no impact but does not offer enough supporting evidence nor does it address the increased capacity. EIR should provide evacuation plan and detail the impacts this project on the cumulative community evacuation plan. EIR should provide supporting information that identifies the impact level.
Fire Risk and Evacuation	Evacuation Capacity	Why is there no evacuation times mentioned? Routes 15 & 56 are the designated evacuation routes which will be gridlocked. Previous evacuations such as during the 2007 wildfires resulted in evacuation times over 1 hour to I-15 (primary evacuation route) from within the CMR neighborhood. EIR should analyze and identify evacuation time impacts due to the addition of 3180 residents to the cumulative impacts for the area. EIR should investigate additional access to I-15 and SR-56 during emergency evacuation.

03-9

03-10

03-11

03-12

03-9

Refer to **Response to Comment O2-49b.**

03-10

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5.**

03-11

Refer to **Master Response 5.**

03-12

Refer to **Master Response 5.**

Topic Area	Issue	Comment
Land Use	Project Objective 7, section E5.3 not met - Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure that the project is cohesive and respectful of existing properties.	CMR Community plan or City General Plan - The Trails is proposed to be an infill project with large multi-unit buildings 37' and 48' tall and only 50' away from existing 2 story single family detached homes. Height differences could be even greater depending on lot elevations and/or if an increased density is approved (i.e., Unit 3, from 300 to 453). As a single comparison, the 3 story Jefferson Apartments have at least a dense 100' landscaped buffer and 40' grade separation from the condominiums at Windham and a 200' separation across the former fairway to the homes on Carmel Ridge Rd. Carmel Landing Apartments are purposely located at lower elevations to homes on the east. Single family homes in Carmel Mountain Ranch that have a 50-foot or less rear separation in backyards are only adjacent to similar single family homes that are of an equal height and type. Proposed project also fails to meet current Landforms and Grading guidelines by CMR Community Plan that has always sought to provide a more aesthetically pleasing environment (see p. 67-74). EIR should be analyze alternatives such as variable setbacks from 75-100' that would mitigate development being proposed and ensure that the project is cohesive and respectful of existing properties as desired by previous guidelines (CMR CP and City SD General Plan). EIR should analyze why a lack of distinct buffer elements (such as separation of grades (slopes), berms, dense evergreen
Land Use	The project would develop distinct residential neighborhoods with a diversity of housing types and open space amenities and with a unique character and sense of place which would be accomplished through implementation of project-specific design guidelines.	Project is not distinct and guidelines are developed to be compatible with new development and not with an in-fill development on a non-contiguous property. Design guidelines need to keep buffers at variable 75-100' wide w/ first 50' solely at 100% densely planted evergreen plantings and no vehicular or structural deviations w/in. All trails should remain outside the first 50' buffer zone as possible next to existing residential with variable 25-50' of buffering. Proposed trails create safety, noise, security and privacy issues to the existing backyards of over 650 single family detached homes in community. All residential buffers need to provide distinct grade separation, evergreen planting, berms, screens, walls and fencing as part of the total design elements to match the CMR Community plan (CMRCP) (see p. 75, CMRCP). These elements are to be used for neighborhoods of contrasting densities (see p. 79 & 80, CMRCP) and reinforce defensible neighborhood concepts (see p. 22, CMRCP). The EIR needs to be updated to show how including these elements (indicated in the CMR Community Plan) will reduce impact to the quality of neighborhoods and increase the cohesive community that is respectful of existing properties.
Land Use	Loss of Open Space and Park Land - The EIR suggests the project will expand designated park land. EIR makes it seem like the Project is providing 111 acres of open space and parkland.	In reality, the Project would result in the reduction of 52 acres of open space, plus another 40-50 acres of support space such as internal roadways, driveways, parking lots, common space, trash areas and trail development with deviations. The greatest amount of open space to be realized would be provided by the "no project alternative" in the EIR. EIR needs to recalculate analysis appropriately. The EIR clearly states: "The project site is designated Park, Open Space, and Recreation in the General Plan." (5.7-16). The City of San Diego General Plan states: "The General Plan is the foundation upon which all land use decisions in the City are based. The plan expresses a citywide vision and provides a comprehensive policy." The City of San Diego climate action plan establishes the protection of open space as an important goal: "Protect Open Space, Parks and Recreation Parks and open space are important resources that contribute to San Diego's culture, character, and economy." Green spaces also offer recreational and tourism opportunities. Open Space also serves as a climate change adaptation resource that alleviates the heat island effect and potentially reduce the impact of flooding." EIR needs to be updated to acknowledge the total overall loss of open space and parkland and that the net loss is not an improvement.

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03-13

As noted in Chapter 5.1, Land Use, and discussed in Table 5.1-2, the project would include a minimum 50-foot buffer zone between existing homes and proposed new development, which may include open space and landscaped areas. Refer to **Response to Comment 02-13a** for uses allowed in the buffer.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. As noted in this section, implementation of the project would result in changes in the aesthetics of the site and its surroundings. According to Public Resources Code Section 21099(d)(1), aesthetics impacts of a project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Nevertheless, the analysis was still necessary because Section 21099 does not affect a lead agency's authority to consider aesthetic impacts pursuant to local policies and rules. The Draft EIR determined the project's impacts would be considered less than significant. Also refer to **Master Response 2**. As explained in **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, the project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan.

03-14

Refer to **Response to Comment 02-7**. Potential noise impacts were addressed in Section 5.11, Noise, of the Draft EIR. Impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**.

Topic Area	Issue	Comment
Land Use	Trails would range from 5 to 8 feet in width and all trails would be publicly accessible. Over 650 homes along the golf course have "open style" W.I. fencing that was to provide a open space/view shed easement to the private golf course. If these trails are made for public access, they will create serious safety, security, privacy and noise issues.	Two key items to this issue. One, the EIR needs to update their noise analysis charts to include key buffer elements that have purposely been eliminated to cut project costs in favor of development (under open space/S buffer zones, separate grade elevations, CMU Walls and fencing). It is very important to ascertain noise levels to be mitigated along the backyards of these existing homes as a mitigative element for disturbing the safety, security, privacy, and noise issues. Elements should include such as: a 75'-100' vegetative evergreen buffer w/ substantial amount of trees and shrubs, Separate grade level change (20' minimum), 6' high architectural CMU wall. How many db's can these elements mitigate? In addition, please address in the final EIR how the safety, security and privacy issues can be mitigated with these elements? How is EIR also analyzing the current safety, security, and privacy of the 650 homes if the back yards now become publicly accessible?
Land Use	Issue 2: Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?	The design of this residential development adversely affects surrounding land uses and topography. The new residential site planning is insensitive to the existing residential and natural environmental concerns. It needs to establish a sense of safe neighborhood design by the use of physical transitions, natural or created, by separation of internal circulation patterns. Buffers being proposed are not detailed enough and do not explain what buffers are to be, such as separation of grades (slopes), berming, dense evergreen vegetation, walls, fencing. This is needed as a means of demonstrating and reinforcing the concept of defensible neighborhoods. EIR needs to review grading plans and 'marked up' developers Design Guidelines by CMR CFG to understand the totality of site and community impact issues not being addressed or mitigated for. EIR needs to analyze the detailed site development plans for all Units that includes all housing and vehicle infrastructure in order to accurately analyze the project and provide the analysis for community review.
Land Use	Project's Consistency with City of San Diego's General Plan	The City of San Diego's General Plan is considered the ultimate basis upon which all the land use decisions by the City are established to follow. It asserts a city adopted concept and comprehensive policy as the standard to go by. The City of San Diego Climate action plan establishes the protection of open space as an essential goal for projects. It states that the protection of Parks, Recreation and Open Space are important resources that highly contribute to San Diego's culture, character, and economy. Green spaces offer recreational and tourism opportunities. They also serve as a climate change adaptation resource where they can lessen the heat island effect and potentially reduce the impact of flooding. This project does not meet the existing criteria for protecting its existing and dedicated open space and thus has a negative effect on the existing community of CMR's culture and character. EIR should review and address issues identified by CMR/SS CC Position letter of 07/15/20 and Community markups of NUW Design Guidelines 04/14/20 version.

03-15

Refer to **Response to Comment 02-11a.**

03-16

Noise impacts are discussed in Section 5.11, Noise, of the Draft EIR. As discussed therein, the project would result in potential construction noise impacts and would implement attenuation mitigation measures to ensure construction activities not exceed 75 A-weighted decibels (dBA) community noise equivalent level (CNEL); thereby impacts would be reduced to below a level of significance. In addition, the Draft EIR identified operational noise impacts associated with outdoor heating, ventilation, and air conditioning (HVAC) could exceed 40 dBA between 10:00 p.m. and 7:00 a.m. Therefore, the project would implement attenuation mitigation measures to ensure that noise levels would not be exceeded, and impacts would be reduced to below a level of significance. Refer to **Master Response 4.**

03-17

Refer to **Response to Comment 02-7** and **02-11a.**

03-18

Comment noted. Refer to **Response to Comment 02-3e.** The Draft EIR includes a CEQA-compliant description of the proposed project. Refer to Section 3.0, Project Description. Table 3-1, Proposed Land Use and Zoning per Unit provides a statistical summary of the project, and Figure 3.1-1, Proposed Land Use, graphically depicts the project site and land uses. Further, the Project Description describes the types of land uses anticipated by the proposed project, in sufficient detail to allow the Draft EIR to analyze the potential impacts of the project. The Draft EIR evaluated the environmental impacts of the project as described in Chapter 3, Project Description, and

as governed by the Master Planned Development Permit and associated Design Guidelines. Also refer to **Master Response 1** and **2**.

O3-19 Refer to **Master Response 1**, and **Response to Comment O3-18**. Regarding open space, refer to **Response to Comment O2-11a**.

Topic Area	Issue	Comment
		The Carmel Mountain Ranch Community Plan is considered the ultimate framework upon which all the land use decisions and conformance by the City are decided. It asserts a city adopted concept and comprehensive policy as the standard to go by. It states that the protection of Parks, Recreation and Open Space are important resources that highly contribute to San Diego's culture, character, and economy. The current EIR adopted was for 7,185 dwelling units, 14,000 resident population and 7,000 employment opportunities. This project does not meet the existing criteria for protecting open space and thus has a negative effect on the community of CMR's culture and character. EIR should analyze the significant impacts to the CMR community from the project in the context of the 1981 Rancho Carmel Community Plan and accompanying EIR (approved March 16, 1981) as well as the 1984 CMR Plan and associated amendments. These impacts should be identified and compared to the current development criteria to document the variation in development policies and criteria. Areas where the project conflicts with the CMR Community Plan should be identified and documented.
Land Use	Project's Consistency with Carmel Mountain Ranch Community Plan Goals	As the project does not adequately address reduction in open space, public park space, etc., the EIR should be updated to indicate that this project is inconsistent with Community Plan Goals.
Noise	Issue 6: Would the Project result in the exposure of sensitive receptors due to current or future noise levels, which exceed standards established in the Noise Element of the General Plan? The project's land uses would be compatible with Table 5.1-1, City of San Diego Land Use Noise Compatibility Guidelines; therefore, impacts would be less than significant.	Disagree with EIR's less than significant impact comment for Issue 6. EIR needs to include more comparative studies that analyzes noise level differences between the existing 2 story detached single family home backyard mitigation option vs. a proposed 3-4 story apartment tower with roadways and parking lots that are only 50' away from existing homes. Also an option should include the reduced alternative option as well which shows an increase at Unit 9 (from 300 to 453 units). EIR should include noise level analysis for single family residential units at 65 dBA per Table 5.1-1 as SFR units are located on both sides of each unit development area.
Noise	Given the nature of the project site, being interspersed within existing residential land uses, the distance from the acoustical center of localized construction operations to the nearest existing noise-sensitive land uses would range from approximately 105 feet to 185 feet. With the proximate location of noise-sensitive land uses, the majority of construction operations associated with the proposed project would exceed the City's 75 dBA 12-hour average property line noise level threshold and, therefore, mitigation would be necessary.	Table 5.11-6 indicates the construction noise thresholds for various phases. For example, the distances for paving, utilities, grading, construction, and demolition range from 128' to 162'. However, numerous Units have entire widths of approximately 200'. As a significant section development will be approximately 50' from existing homes, the construction noise level will exceed 75dBA and will likely be over 80dBA without mitigation. The proposed mitigation MM-NOI-1 indicates that the "proposed project implementation within 175 feet of noise-sensitive receivers includes noise-reduction measures to ensure construction activities do not exceed the 75 dBA" This mitigation appears to be vastly insufficient. For each development unit, almost all existing homes are well within the 175' with some homes likely to be within 50-100' of major construction noise sources. The EIR should re-analyze the proposed noise mitigation to consider construction noise sources that are within 50-100' of existing homes and noise-sensitive receivers (such as children in backyards). EIR should be updated to indicate that current construction noise mitigation is insufficient and will have significant impact.

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03-20

Refer to **Master Response 1** and **Response to Comment 02-11a**, respectively.

03-20

Regarding conducting analysis, based on the 1981 Rancho Carmel Community Plan and 1984 Carmel Mountain Ranch Community Plan, under CEQA Guidelines Section 15125, the impacts of a proposed project must be evaluated by comparing expected environmental conditions after project implementation to conditions at a specific point in time, referred to as the baseline. The referenced 1981 and 1984 documents do not represent actual baseline conditions at the time the project commenced. Therefore, a comparison of impacts as it relates to these documents is not required under CEQA.

03-21

03-21

CEQA does not require analysis of a hypothetical project, but rather impacts are analyzed based on the proposed project. Refer to **Master Response 10**. Regarding operational noise impacts from roadways, impacts were analyzed in Section 5.11, Noise of the Draft EIR. Impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**.

03-22

03-22

Regarding construction noise impacts in relation to existing homes, impacts were analyzed in Section 5.11, Noise of the Draft EIR. Impacts were determined to be less than significant with mitigation.

Topic Area	Issue	Comment
Noise	From the EIR: Assuming an attenuation rate of 6 dB per doubling of distance and shielding that would break the line at site to the outdoor HVAC equipment, the noise level at the nearest receiving property line would be approximately 44.5 dBA during continuous operation, exceeding the San Diego Municipal Code residential noise level standard of 40 dBA between 10:00 p.m. and 7:00 a.m.	Exceeding SD Residential noise limits is a serious issue, especially for young children. Studies indicate that excessive noise levels on children has physiological and psychological effects. The World Health Organization has published literature outlining cognitive function impairment relating to prolonged excessive noise levels. The EIR indicates approximately 44.5 dBA between 10pm & 7am. Considering no site plans are available, along with detailed information on the vehicle and housing infrastructure, it's difficult to determine noise impact severity and what mitigation is required. The EIR should re-analyze construction, short-term, and long-term noise impacts with the full development plans for each site. Special consideration should be included for noise-sensitive receivers such as children as nearly every unit is impacting the backyard of over 500 homes.
NOP Comment	EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2) is missing items that should be reviewed and part of analysis.	EIR should include these documents provided by the CMRSS/CC CPG to the SD Planning Department in Appendix A. A red-lined markup of the developer's guidelines for the Trails (version dated April 14, 2020) and a position letter (dated 07/15/20) were provided by the CMRSS/CC CPG to the City of San Diego Development Services Department and M/W developer. Also, no CMRSS/CC CPG meeting minutes references were provided as important community input and background information. However, this information was not part of the EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2). EIR should update, include and analyze these documents provided by the CMRSS/CC CPG to the SD Planning Department in Appendix A.
Open Space	Recreational Open Space - Approximately 111.0 acres of development would be composed of parkland, open space, and buffer area. This area includes approximately 6 miles of publicly accessible trails and 7.9 acres of publicly accessible parkland; 78.3 acres of open space; and 25.0 acres of buffer area.	The Community disagrees with developer's definition of "Open Space" to include the 25.02 acres of buffer zone and other odds and ends Lots that are part of Units developed with housing. An acceptable and more common-sense approach is to only count as "Open Space" Units which will not have housing (63.2 acres). Units with clusters of 3 and 4 story multi-unit buildings with 50' of buffer from existing homes with no distinct grade change cannot be considered "Open Space". EIR should be updated to reflect open space and parks of 71.1 acres (63.2 open space + 7.9 parks). Buffer areas within developed units account for the remainder of 37.9 acres
Open Space	Project's Inconsistency with City of San Diego's General Plan	By eliminating pristine Open space and view sheds, project fails to meet main goal of General Plan which states " Purpose - To preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users". (See RE-3 of Recreational Element for General Plan and Figure RE-1 Community Plan Designated Open Space and Parks Map). The golf course is a dedicated visual recreational amenity for the community per the CMR Community Plan. EIR should be updated and show a detailed analysis to determine how project can furnish more open space and maintain existing view sheds for the existing residential neighborhoods located along the designated ridge line homes of CMR.

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03-23

Regarding noise impacts to sensitive receivers, impacts were analyzed in Section 5.11, Noise of the Draft EIR. Impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**.

03-24

Refer to **Response to Comment 02-3e**.

03-25

A Covenant of Easement would be provided for open space areas in accordance with the Entitlements.

03-26

Refer to **Master Response 1, Response to Comments 03-13 and 02-11a**. As noted in the City's CEQA Significance Determination Thresholds, views from private property are not protected. Thus, the project is not required to preserve views from private property, or to provide an assessment within the Draft EIR of how the project would impact views from private properties.

While development of the project would result in the loss of the golf course (identified in the Carmel Mountain Ranch Community Plan as a visual recreational amenity for the community; see first paragraph on page 87 of the Community Plan), the project would not eliminate publicly accessible identified distant views that extend outside of the community.

Identified views into and out of the community are depicted on Figure 19, Landform and Visual Analysis, of the Carmel Mountain Ranch Community Plan. Project effects on identified views to distant views outside of the community (including from the lone vantage point on the golf course) would not be

significant. The site is currently fenced, and no access is provided to the public. Thus, the golf course vantage point depicted on Figure 19 of the Community Plan (i.e., fairway of Hole 9) is not currently available to the public. Further, even when the golf course was active, the identified vantage point was not widely available to the public as it is located on a recreational facility requiring payment of fees to access and experience. For those accessing the golf course (when active) and specifically, the fairway of Hole 9, views extending outside of the community are generally blocked by the presence of two-story single-family residences, mature trees, and four-story multifamily buildings to the west of the golf course and single-family homes and landscaping to the east of the golf course.

As described in the community plan, the golf course functions as a visual recreational amenity. Commenter refers to the golf course as a dedicated visual recreational amenity however, the community plan contains no policies requiring the maintenance of the golf course/visual recreational amenity and nowhere in the community plan is the feature referred to as a dedicated or protected amenity. In addition, as part of the Community Plan amendment process, language in the Community Plan pertaining to the golf course being a “visual recreational amenity” will be removed.

Development of the project site would alter existing views available from residential neighborhoods located along ridgelines in the local area. While neither the City nor CEQA expressly protect views from private property or more generally, observable visual change, the project site is lower in elevation than ridgeline homes and the top of roof of proposed buildings would generally be below existing line of sight from the ridgeline residential neighborhoods. Thus, views from the ridgeline residential neighborhoods would extend over and beyond structures on the project site and new buildings would not result in substantial blockage of existing views.

Topic Area	Issue	Comment
Open Space	The majority of the project site would be retained as recreation and open space. Open space uses would be composed of approximately 111.27 acres, which includes approximately 6 miles of publicly accessible trails and 9.79 acres of publicly accessible parkland.	The EIR is incorrect that the majority of the project site is retained open space and recreational land. The developer is claiming of only developing 53.2 acres (47.3%) of the 164.54 acres of golf course. However, in actuality, the developer is developing 11 of the 18 holes (61%) which is equivalent to 100.37 acres that are directly impacted by development. In addition, the 53.2 acres indicated by developer only accounts for the building floor plan. They are not accounting for all the vehicle and residential infrastructure such as driveways, private roads, utilities, parking lots, private common space for units such as playgrounds, green space, etc. The EIR states an incorrect park acreage total. The total park acreage is 7.47 acres (not 9.79). The EIR needs to be updated to indicate that over 100 acres are directly impacted by development. The EIR needs to be updated to include an analysis of the impacts for each unit's vehicle and housing infrastructure that extend into adjacent lots and include in the document for clarification.
Open Space	Preserve, protect and enhance the integrity and quality of existing parks, open space, and recreation programs citywide. Preserve, protect and enrich natural, cultural, and historic resources that serve as recreation facilities.	Actually, project is creating a net reduction in Parks and Open Space for CMR as NUW is proposing developing over half of the 164-acre golf course (11 of 18 holes). Golf course is already designated as Parks and Recreational Open Space per the City's General plan. Project reduces recreation space within CMR by 44%. EIR should be corrected to indicate Policy RE-C.2 is inconsistent with policy.
Parks	Policy RE-A.8 Provide population-based parks at a minimum ratio of 2.8 useable acres per 1,000 residents (see also Table RE-2, Parks Guidelines).	Project should add 8.9 acres of parks for the 3,180 new residents in CMR, however project only adds 7.9 acres. In addition, the CMR park deficit rises to 20.98 acres. Project should eliminate the deficit in park space by adding 20.98 acres for a total of 27.88 acres of park space. EIR should be updated to indicate Project is Not Consistent with Policy RE-A.8
Parks	An equitable citywide distribution of and access to parks and recreation facilities. OP-1-1: This zone would be assigned to public parks on Units 7, 15, and 16 and would be designed in accordance with the City's General Development Plan public input process (p. 3-10).	Disagree that project is providing an equitable citywide distribution of and access to parks and recreation facilities. One of the largest parks proposed, Lot 7, is totally inaccessible for ADA compliance or vehicles (maintenance and emergency) due to its elevation change. In addition it has major visual/surveillance concerns that do not meet OPED provisions (https://www.oped.net/) or goals for Recreational Element of the City's General Plan (See RE-6 goals). There are many areas that are more accessible and community equitable for providing developed parks and recreation such as Lots 3, 5 and 9 that are more suitable to community. They are ADA accessible, closer, offer better surveillance opportunities for police and public view. Developed neighborhood parks should not be placed on sloped, inaccessible or 'leftover' open space. EIR should look at alternative location for parks that provide improved access and safety.
Parks	Provide population-based parks at a minimum ratio of 2.8 useable acres per 1,000 residents (see also Table RE-2, Parks Guidelines).	The park space requirement of 2.8 ac/1000 residents is also low when considering trends on housing. These last 5-6 years trends include children living at home longer with parents or families combining living quarters together to save money. Developer needs to increase current Park acreage to increase to 9-10 acres to offset loss of open space. EIR should investigate whether 2.8 acres/1000 people is sufficient due to increasing occupants/unit trends in San Diego.
Parks	Accessibility Goals - A park and recreation system that provides an equitable distribution of park and recreation facilities that are designed to accommodate the needs of a diverse population.	The CMR golf course was constructed on steep hillsides making pedestrian/senior usage, ADA compliance, and bicycle travel a challenging exercise for all but the fittest with a elevation change of over 270' from Ridgeline homes to the recreation center. Additionally, the project's trails are proposed to be only 5-6 feet wide. They are to be partially constructed of decomposed granite that are non-sustainable and will erode constantly. Finally, people riding down the hills may be traveling at a high rate of speed making it hazardous for people. EIR should be corrected to indicate Policy RE-D.6 is inconsistent with policy.

CMR/SS CC Draft EIR Response - Trails @ CMR

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03-27

Refer to **Response to Comment 02-11a**. In addition, Appendix T of the Draft EIR includes the Tentative Map and a breakdown of all acreages.

03-27

03-28

Refer to **Response to Comment 02-11a** and **Master Response 1**. Regarding consistency with General Plan Policy RE-C.2, refer to Draft EIR Table 5.1-2; the project was determined to be consistent.

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03-29

Refer to **Response to Comments 02-11a**, and **05-3**. Regarding consistency with General Plan Policy RE-A.8, refer to Draft EIR Table 5.1-2; the project is consistent.

03-31

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03-30

Regarding trail safety, refer to **Response to Comment 02-11a**. Also refer to **Master Response 3**.

03-31

Refer to **Response to Comment 05-3**.

03-32

Refer to **Response to Comment 05-3, 02-11a, 02-12c**, and **Master Response 3**. Regarding increasing hazards, the Draft EIR analysis in Section 5.1, Land Use, and Section 5.2, Transportation/Circulation determined such impacts would be less than significant. As stated, the project does not include any elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. Regarding consistency with General Plan Policy RE-D.6, refer to Draft EIR Table 5.1-2; the project is consistent.

Topic Area	Issue	Comment
Parks	The current household population of 13,104 people in the Carmel Mountain Ranch CPA (SANDAG 2019) warrants 36.4 acres of population-based parks, based on the General Plan standard of 2.8 acres per 1,000 people. As previously identified, the community has 16.72 developed usable acres of population-based parks, resulting in a total current deficiency of 19.97 useable acres of population-based parks.	Project adds 3,180 residents to CMR for a total of 16,284 residents. A corresponding number of parks per the General Plan should be 45.6 acres. This project adds 7.9 acres to the exist 16.72 acres, leaving a deficit of 20.98 acres. EIR should consider alternatives that increase the park space to the recommended 2.8 acres per 1,000 people based on the General Plan. Alternatives should address the 20.98 acre deficit in public parks.
Public Service - Library	However, no capital improvement program exists to redevelop the library site and no fee program has been established to fund such an project. Although the project will make a fair share contribution to address the impacts caused by the associated population increase, the improvements cannot be guaranteed. Therefore, impacts to library facilities would be significant and unavoidable.	The SD General Plan indicates branch libraries should be 15,000 sq ft or larger but the current CMR library is only 13,102 ft. EIR states that "project would increase the demand for library services, thereby exacerbating the existing impact. ... Although the project will make a fair-share contribution to address the impacts caused by the associated population increase, the improvements cannot be guaranteed." EIR should investigate alternatives that eliminate the public services deficiency such as increasing the size of the library to the recommended 25,000+ sq ft. The EIR should correct the Public Facilities and Services Element on page 5.1-126 to indicate the Project is not consistent with objectives and guidelines.
Traffic	Study Area does not address impacts from project on I-15 & SR-56.	Project generates peak traffic generation of 657 (AM) and 772 (PM) peak hour trips. Per city Traffic Impact Study Manual (1998) freeway traffic study is required when trips exceed 150 and by the regionally adopted San Diego Traffic Engineer's Council (SANTIC) ITE guidelines for impacts over 50 peak hour trips. However, no freeway impact analysis has been conducted although peak hour trips will likely exceed the both requirements. The EIR should conduct freeway and update document to include freeway impact analysis as peak hour trips exceed 150.
Traffic	Table 7 is missing projects that impact the cumulative traffic analysis.	EIR traffic analysis and local mobility analysis should be updated to include following projects as any project along SR-56 will likely cause East/West traffic along Ted Williams Parkway. Millennium PQ (June 2019) 331 units #64431 Merge 56 Aperture Del Mar Preserve at Torrey Highlands Without adding these cumulative projects, this EIR is deficient. Missing projects add significant daily and peak hour trips. For example Pacific Village with 601 units generates 1796 trips - so Millennium PQ with 331 units could generate at least 989+ daily trips. Commercial projects such as Merge 56 and Aperture Del Mar will generate significant E/W traffic on SR-56/Ted Williams and N/S I-15 as they draw workers from the larger regional area.

CMR/SS CC Draft EIR Response - Trails @ CMR

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03-33 Refer to **Response to Comment 02-11a**.

03-34 Refer to **Master Response 6**.

03-35 With regard to freeway traffic, the City's TSM, which established study requirements for transportation/ circulation analysis in the City, does not require the analysis of freeway segments in the Local Mobility Analysis. However, a freeway interchange queuing analysis was provided within the LMA (Draft EIR Appendix C) for the I-15 ramp terminal intersections along Ted Williams Parkway and Carmel Mountain Road, for the off-ramp conditions. The LMA determined that queuing at the off-ramps from I-15 to these roadways, in both the north and southbound directions would not exceed storage capacity under the opening year (2025) and horizon year (2050) conditions. Thus, the requested analysis is not required for CEQA purposes.

03-36 Refer to **Response to Comment 03-4**.

Topic Area	Issue	Comment
Traffic	Table 9 - Ted Williams Parking 1. I-15 to Rancho Carmel Drive is not 6 lanes in WB direction	Ted Williams WB between Rancho Carmel exit lane and I-15 is only 2 lanes, not 3 lanes. Furthermore, due to the I-15 NB and SB on-ramps access on the right hand lane, significant vehicles queue up in the right lane occurs during peak AM trips generation. When this occurs, vehicles in the right lane on Ted Williams include I-15 on-ramp traffic, Rancho Carmel-Ted Williams WB merging traffic, and Ted-Williams to Rancho Carmel NB/SB exit ramp traffic. Vehicle backups on Ted Williams WB from I-15 SB on-ramp to Shoal Creek Drive often occur during this period. EIR should update traffic analysis to reflect this area is only 2 lanes as well as significant & unique queuing that occurs in the right lane.
Trails	Project's Consistency with City of San Diego's General Plan - Item F: Provide adequate levels of lighting for pedestrian safety and comfort.	Multi use trails are being developed by adapting golf cart path which run adjacent to 600 existing homeowners backyards. These trails are not safe, not ADA compliant or comfortable at all due to the 27' change of elevation throughout the hilly and sloped community from the TPA site. Also the width of these trails is too narrow and create existing homeowner's safety, security, noise and privacy issues. Multi-use trails need to be at least 12 to 14 feet wide to accommodate two-way traffic, a variety of users (hikers, walkers, runners, bikes and skateboarders) and be a minimum of 50' from existing homeowner fences. The trail design also needs to meet the ADA slope limit of not being steeper than 5%, or up to 8% with handrails. EIR should re-evaluate the proposed trail system to ensure trails are ADA compliant. EIR should clarify and explicitly state where trails (either partially and/or as a whole) meet/don't meet American Disability Association (ADA) accessibility requirements.
Trails	A multi-use trail system would circulate throughout the project site to provide mobility and recreational opportunities for pedestrians and bicyclists. The majority of the trail system would include paved trails that would be repurposed from the previous golf cart path, and new paved trails would provide connections through new development areas. Trails would range from 5' to 8' feet in width and all trails would be publicly accessible.	The trail systems are relying on unusually steep, hilly and narrow ex-golf-cart paths as shared use or multi-use trail system. The ex-golf-cart paths are not safe for Senior citizens/pedestrian usage or ADA compliant due to 27' change of elevation throughout project. Therefore, trails are not publicly accessible for pedestrians without major trail reconfiguration and switch-backs to maintain <5% slope. Also, typical standard width of Class I multi-use trail system is 12' clear paved path per City of San Diego Bicycle Master Plan (see p. 19). CMR Community plan already specifies a 15' multi-use trail (see p. 49) existing in lower south portion of CMR development. The EIR should analyze impact to local mobility if the trails are not updated to meet ADA and bike path requirements as utilization would likely be reduced by at least 25% resulting in increased vehicle daily and peak trips.
Transportation	However, per Ordinance Number 21057, if a portion of the project is within the TPA (i.e., holes 4, 5, and 6), the designation and associated parking reductions would apply to the entire project site.	The ordinance that "all or a portion is located of the premises within a transit area" is intended for contiguous properties. That it should apply to a golf course with independent units/lots that spans multiple major roads and intersections appears to be a gross misappropriation of the ordinance. To indicate that Unit 16 more than 1.5 mile away is part of the TPA is technically and logically incorrect. EIR should be updated to not use the TPA designation for units that do not have any portion that is within the TPA.

CMR/SS CC Draft EIR Response - Trails @ CMR

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03-37

As noted in the Draft EIR, Ted Williams Parkway from I-15 to Rancho Carmel Drive is classified as a 6-lane expressway, and three lanes are provided up to the westbound exit ramp and after the westbound entry ramp onto Ted Williams Parkway from Rancho Carmel Drive. The portion of Ted Williams Parkway in between the westbound ramps is two lanes; however, Ted Williams Parkway is classified as a 6-lane expressway between the I-15 ramps and Rancho Carmel Drive. The level of service analysis uses the correct lane configurations at the study intersections. The analysis does not analyze merge operations (i.e., queuing due to the merge) between the Rancho Carmel Drive on-ramp and I-15 ramps intersection. The City of San Diego Transportation Study Manual (City of San Diego 2020) established study requirements for transportation/circulation analysis in the City of San Diego. The Transportation Study Manual does not require the analysis of freeway segments or merge analysis. Additionally, Level of service and congestion or capacity-based measures of effectiveness (such as queuing) are not considered as impact criteria for CEQA purposes. Therefore, are not considered in the transportation/circulation impact analysis for CEQA purposes and no CEQA mitigation is required associated with project traffic being added to the Rancho Carmel Drive on-ramp and I-15 ramps intersection.

03-38

Refer to **Master Response 3** and **Response to Comment 02-3b**.

03-39

Planned bicycle facilities included in the Community

Plan and Bicycle Master Plan have been constructed at this time in the community. However, the project would include a trail system that would circulate throughout the project site to provide increased mobility and recreational opportunities for pedestrians and bicyclists on the project site. The proposed trail system would be publicly accessible and privately maintained. Regarding ADA, refer to **Master Response 3**.

- O3-40** As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a)(2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

Topic Area	Issue	Comment
		Yes, the new driveways/roadways proposed for this project will significantly impact the existing community's transportation systems, including transit, streets, bicycle and pedestrian facilities. Almost ALL of the proposed units have ONLY one driveway that goes in and out of their individual developments that are "shoe-horned" in between the already close driveways of other nearby roadways. In addition, there are important considerations on evacuations, peak and daily trips generated at each unit onto the adjacent streets, and bicycle and pedestrian facilities. This will cause unsafe and hazardous influences on or community and does not conform to the General Plan and CMR Community Plan. Some of driveways impacted include (but not an extensive list) the following units/intersections: #1 - between Seabridge Lane and Chippenham Way; #2 - between Capewood Lane and Windcrest Lane; #5 & #6 - Adjacent to driveways for Royal St George (South exit), CMR Community Park & Gymnasium, Aviate Development, and Provincial Place; #8 - Windcrest Lane and Stony Gate Place, and nearby Ted Williams Parkway; #9 - Carmel Ridge Road, Brewster Court and proposed unit # 10 driveway; #10 - Carmel Ridge Road, Brewster Court and proposed unit # 3 driveway; #16 - Highland Ranch Road, Eastbourne Road and Bratton Square driveway; #17 - Eastbourne Road, Carmel Ridge Road and Brent Wilsey Way. EIR needs to add precise development plans for each Unit and conduct a detailed review and analysis of each development unit for mitigating negative impacts.
Transportation	According to the City's Significance Determination Thresholds (City of San Diego 2016), a project is considered to have a significant impact if a project would result in the construction of a roadway that is inconsistent with the General Plan and/or a community plan, or if the proposed roadway would not properly align with other existing or planned roadways.	Only 2 units out of 17 are located within TPA. EIR should state only a portion or fraction lies within TPA throughout entire document.
Transportation	Projected located in TPA.	The developer has not provided any precise site development plans of the project showing any proposed building pads and roadways. Without these detailed development plans, analysis and interpretations by City and others may not be accurate. This is important as the community is not able to evaluate the environmental impacts as a whole for the overall project, including negative aesthetics. A precise site development plan with building pads, internal roadways and driveways, common areas, utilities (trash enclosures, recycle) needs to be provided. The EIR should obtain the full site development plans, re-evaluate the EIR analysis with the plans, and update the report accordingly.
Visual Effect/Neighborhood Character	Issue 2: Would the project result in the creation of a negative aesthetic site or project?	
	The project is not located in a highly visible area such as on a canyon edge or hilltop. While the southwestern portion of the project site is adjacent to I-15 and SR-56 is nearby, intervening terrain and vegetation partially screens the nearest areas of the project site from view. The majority of the project site is screened from view of interstate and state route motorists by intervening terrain, landscaping, and development. As such, the project site is not located in a highly visible area. Further and as previously discussed, development of the project site would not strongly contrast with the surrounding development or natural topography through excessive heights, bulk, signage or architectural projections.	This project is highly visible, blocks and eliminating community viewing resources and corridors including views of downtown San Diego, downtown Poway, UTC, Mt. Woodson, Iron Mountain and Black Mountain. Development is not creating a sense of neighborhood and/or providing any significant physical transitions and buffers between development and existing residential, therefore not reinforcing a key design rule for creating distinct neighborhoods. Clusters of 3 and 4 story multi-unit buildings on Units 1,2,7,9 and 10 that are immediately adjacent (50' buffer) to existing homes with no distinct grade change are highly visible and not compliant with current CMR Community Plan. Developer needs to mitigate impacts by providing distinct grade changes, berms, dense vegetative evergreen landscape buffers, walls, and fencing. This needs to be analyzed and incorporated into impact analysis (see p. 62 Landform and View Analysis in CMR Community plan). EIR should be updated to indicate significant impact to existing community and include mitigations noted above between existing housing and proposed new development.
Visual Effect/Neighborhood Character		

CMR/SS CC Draft EIR Response - Trails @ CMR

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03-41

The Draft EIR analyzed the proposed project presented in Figure 3-1, Land Use and Figure 3-2, Zoning, from a worst-case perspective. The Vesting Tentative Maps ~~was~~ were also provided in Appendix T of the EIR. The Draft EIR evaluated the environmental impacts of the project as described in Chapter 3, Project Description, and as governed by the Master Planned Development Permit and associated Design Guidelines. The project is also processing a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation. Regarding transportation hazards, the project does not include any elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians. The proposed circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. Access points would not create a hazard for vehicles or people entering or exiting the site. Therefore, the project would not result in a hazardous roadway design or unsafe roadway configuration; place incompatible uses on existing roadways; or create or place curves, slopes, or walls that impede adequate sight distance on a roadway.

Transportation/circulation impacts were addressed in Section 5.2, Transportation/Circulation of the Draft EIR. All proposed internal driveways would be stop-controlled and would operate at a Level of Service B or better, as discussed in the LMA prepared for the project (Draft EIR Appendix C).

Regarding evacuation, refer to **Master Response 5**.

Topic Area	Issue	Comment
Visual Effects/Neighborhood Character	For Issue #4, Significance of Impact, "Alteration to Existing or Planned Character", the EIR conclusion that the significance of impact would be "less than significant". The EIR also states (page 5.17-18): "Lastly, as previously noted, aesthetic impacts of the proposed project, which is an infill residential project within a transit priority area, cannot be considered a significant impact under California Public Resources Code Section 21099."	This statement is also inaccurate because the proposed project is composed of many separate legal parcels, and only several at the southwest end fall within the transit priority area. Therefore, the project as proposed has a "significant and unmitigated" impact regarding "Alteration to Existing or Planned Character". This conclusion is inaccurate as the impact would clearly be "significant and unmitigated". EIR should be updated to indicate significant and unmitigated impacts and analyze mitigations to aesthetics impact

O3-45

O3-42 Refer to **Response to Comment O3-40**.

O3-43 Refer to **Response to Comment O3-41** and **O2-3b**.

O3-44 Aesthetic impacts were analyzed in Section 5.17, Visual Effects and Neighborhood Character. Refer to Response to **Comment O3-26**, and **Master Response 2**.

O3-45 Aesthetic impacts were analyzed in Section 5.17, Visual Effects and Neighborhood Character. According to Public Resources Code Section 21099(d) (1), aesthetics impacts of a project on an infill site within a transit priority area shall not be considered significant impacts on the environment. Nevertheless, the analysis was still necessary because Section 21099 does not affect a lead agency's authority to consider aesthetic impacts pursuant to local policies and rules. The Draft EIR determined the project's impacts would be less than significant. Refer to **Master Response 1** and **2**.

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Comment Letter O4



San Diego County Archaeological Society, Inc.

Environmental Review Committee

28 December 2020

RECEIVED

DEC 30 2020

Development Services

To: Ms. Elizabeth Shearer-Nguyen
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
Trails at Carmel Mountain Ranch
Project No. 652519


Dear Ms. Shearer-Nguyen:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendix M by Dudek, we agree with the impact analysis in the Dudek report and the mitigation measures as proposed.

SDCAS appreciates the opportunity to review and comment upon this project's environmental documents.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Dudek
SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

O4-1

Comment noted.

O4-1

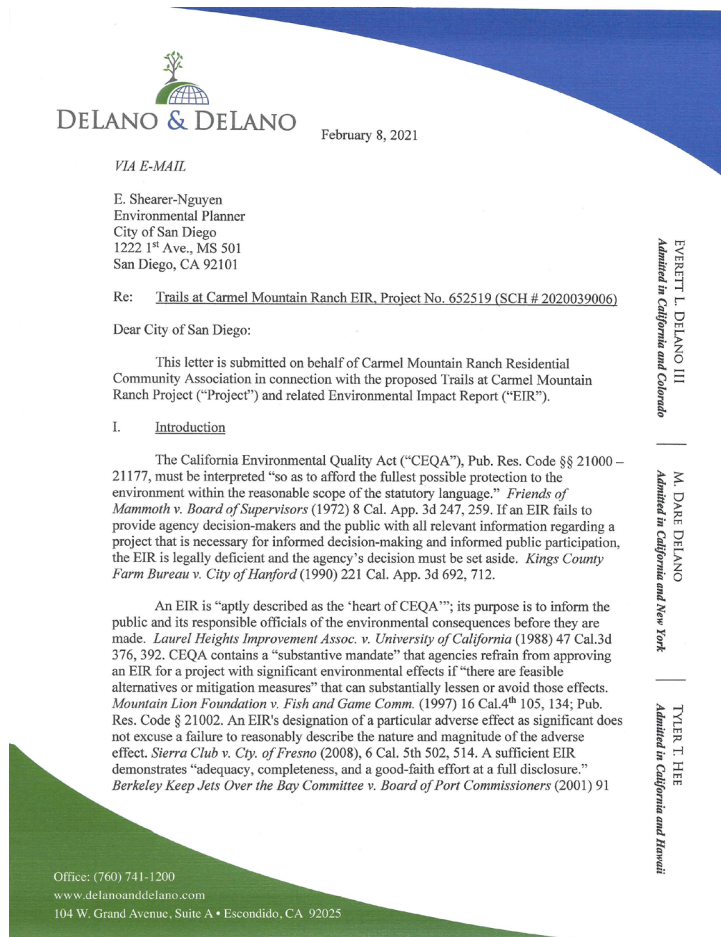
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Comment Letter O5

Response to Comment Letter O5
5 DeLano & DeLano on behalf of
Carmel Mountain Ranch Residential Community Association
February 8, 2021

O5-1

The comment is an introduction to the comments that follow. The comment provides general guidance regarding CEQA. The comment does not address the adequacy of the Draft EIR.



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Cal.App.4th 1344, 1355 (quoting *Rio Vista Farm Bureau Center v. City of Solano* (1992) 5 Cal.App.4th 351, 368).

II. The EIR's Discussion of Project Impacts is Deficient

The EIR fails to adequately analyze impacts to land use.

- The EIR asserts impacts associated with the increased intensity of use would be less than significant because the Project would not conflict with the principles, goals, and policies contained within the General Plan and Community Plan. EIR at 5.1-12. However, the EIR notes the Housing Element does not anticipate any housing development at the Project site to meet the regional housing needs assessment ("RHNA") allocation and impacts to the Housing Element would be potentially significant. EIR at 5.13-7; ES-35. The potential number of units and induced population substantially exceeds current projections since the Plans assumed the site would remain a golf course. EIR at 5.13-8. The analysis fails to support, and even contradicts, its conclusion that impacts would be less than significant because the Project would indeed conflict with the Housing Element of the General Plan.
- The analysis fails to address the Project's inconsistency with the General Plan requirement for park and recreation facilities in the Project site to provide a minimum ratio of 2.8 acres per 1,000 residents for neighborhood parks. EIR at 5.14-4. The EIR admits the community suffers from a current deficiency of 19.97 usable acres of population-based parks. EIR at 5.14-5.

The EIR fails to adequately analyze impacts to transportation.

- The VMT assessment indicated that the expected project VMT of 21.4 to 23.2 VMT/Capita was obtained from the City's VMT per Capita Maps and was not specifically calculated for the project. The EIR relies on census tract information and acknowledges it did not run the required analysis, but instead infers that the Project will not get under the threshold. The specific VMT generated should be determined. The full SANDAG Regional Traffic Modelling needs to be completed for the VMT evaluation to be accurate for this specific project. Letter from Robert Kahn at p. 3.
- The EIR acknowledges the City's Transportation Study Manual ("TSM"), which provides the process for VMT analysis, requires: "If the project does not meet any of the screening criteria, perform VMT analysis to determine the project's VMT." EIR at 5.2-7 (emphasis added). The EIR admits the Project's residential component does not meet any of the screening criteria; thus, a VMT analysis is required. EIR at 5.2-9. However, the EIR fails to determine the Project's actual VMT, ignoring the required analysis. Instead of conducting the appropriate analysis, the EIR concludes: "While modeling the

05 -2

The project was included in the recently approved General Plan Housing Element (City of San Diego 2020), and as a result, the Draft EIR's conclusion that the project would result in a significant and unmitigated population and housing impact has been revised. Refer to **Master Response 9**. The project is consistent with the General Plan and Community Plan as demonstrated in Draft EIR Section 5.1, Land Use. Refer to **Master Response 1**.

05-3

The General Plan identifies a minimum ratio of 2.8 acres of neighborhood parkland per 1,000 residents. As explained in Section 5.14, Public Services and Facilities, of the Draft EIR, a population rate coefficient of 1.97 persons per household was utilized in calculating the required park acreage for the project. This persons per household coefficient is based on the American Community Survey prepared for the Planning Department by SANDAG in 2017, which the City utilizes to calculate park requirements (City of San Diego Pers. Comm. Scoggins 2021). Using this specific multi-family persons per household (1.97) metric accurately reflects the number of residents living in multi-family developments within the Carmel Mountain Ranch community plan area. In contrast, the population coefficient used in Section 5.13, Population and Housing, (2.65 persons per household) is a more general number that took into consideration an average of single family and multi-family persons per household, that is based on SANDAG's Series 2013 Regional Growth Forecast. The Series 13 Regional Growth Forecast represents a combination of economic and demographic

↑ 05-1
Cont.

05-2

05-3

05-4

05-5

projections, existing land use plans and policies, as well as potential land use plan changes that may occur in the region between 2030 and 2050. The population coefficient of 2.65 is a conservative estimate of the actual number of residents generated by the project.

Thus, using the more accurate population coefficient of 1.97, the project's addition of 1,200 dwelling units would yield an estimated 2,364 new residents for purposes of park usage.

Given the General Plan's ratio of 2.8 acres per 1,000 people, a total of 6.6 acres of neighborhood parkland would be required. The project includes a total of 7.87 acres of neighborhood parks, split between three different locations. A 3.38-acre park is proposed within Unit 7, a 1.90-acre park within Unit 13, and a 2.59-acre park within Unit 16. Since the project proposes a total of 7.87 acres of neighborhood parks, the project will satisfy the General Plan's minimum ratio. Thus, there is no inconsistency with the General Plan's park ratio.

O5-4

As discussed in Section 5.2, Transportation/Circulation, impacts would be significant and unavoidable even with implementation of mitigation.

The vehicle miles traveled per capita metric is an efficiency metric that is based on the home location of residents. Since the project is located amongst an existing residential community, the modeled (SANDAG Regional Travel Demand Model) vehicle miles traveled characteristics of the existing residents and new residents are expected to be the same. Therefore, the new resident's vehicle miles traveled per capita will be expected to be the same as the

existing residents' vehicle miles traveled per capita for the census tracts that contain the project.

If an impact is determined to be significant and unavoidable, the City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project.

O5-5

As stated in Section 5.2, Transportation/Circulation, of the Draft EIR, the project vehicle miles traveled per capita is 21.7, 21.4, and 23.2 vehicle miles traveled per capita which is a range of 112.6% to 122.1% of the regional average resident vehicle miles traveled per capita. Therefore, the project's impact would remain significant after implementation of Transportation/Circulation demand management mitigation measures vehicle miles traveled per capita. Impacts were thus determined to be significant and unavoidable. Refer to **Response to Comment O5-4** and **Master Response 3**.

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project in the SANDAG model would provide the project specific estimate of VMT per Capita, it can be inferred from the land use characteristics of the surrounding census tracts and their VMT rates, that it is unlikely the project would generate VMT per capita of 15% below the regional average, even with TDM reductions.” EIR at 5.2-9 (emphasis added). An inference is not an adequate analysis. The EIR fails to conduct the required analysis and fails to analyze the Project’s potential impacts to VMT generation. The required analysis must be conducted and the draft EIR recirculated for public review and comment.

- The EIR acknowledges the Project is not currently located in a VMT efficient location and that impacts would remain significant and unavoidable. EIR at 5.2-8. The Project will result in a worsening of VMT that is up to 4.2 VMT/Capita above the Regional average. VMT Analysis at 2. Since the impacts will remain significant and unavoidable, the analysis must describe the nature and magnitude of this adverse effect relative to VMT.
- The Project will negatively impact traffic. The analysis fails to adequately address several impacts as part of the Local Mobility Analysis. See the attached comments from registered Traffic Engineer, Robert Kahn, incorporated by reference.

The EIR fails to adequately analyze impacts to air quality and odor.

- Reports prepared for the Project revealed several model inputs that were inconsistent with the EIR. See the attached report from Swape Technical Consultation, incorporated by reference.
- The EIR fails to analyze whether the Project will impact conformance with an applicable air quality plan; it assumes the Project will not conflict with the State Implementation Plan and Regional Air Quality Strategy by excluding the Project’s contribution from that of similar projects. The San Diego Air Pollution Control District and City do not provide guidance regarding the analysis of impacts associated with air quality plan conformance; however, the County’s Guidelines for Determining Significance and Report and Format and Content Requirements – Air Quality discusses conformance with the Regional Air Quality Strategy. Air Quality Technical Report at 34-35. The Guidelines provide the Project will not be in conflict with the RAQS if the project, in conjunction with other projects, would not contribute to growth exceeding SANDAG’s projections. *Id.* The analysis assumes the Project will not indirectly induce growth since most of the surrounding area is developed and that no other projects will coexist contemporaneously with the Project; at the same time, the EIR notes other large development projects nearby, such as the Farm in Poway Project, will result in conversion of land to impervious surfaces. EIR at 6-7. Before it can claim it does not conflict with the RAQS,

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The vehicle miles traveled analysis discloses that the project vehicle miles traveled per capita is 21.7, 21.4, and 23.2; which equates to approximately 112.6% and 122.1% of the vehicle miles traveled threshold of 16.2 per capita. Thus, the Draft EIR discloses the project’s significant and unavoidable Transportation/Circulation impact. Refer to **Master Response 3**.

O5-7

Refer to **Response to Comments O5-1-1** through **O5-1-26**. Also refer to Master Response 3.

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Refer to **Response to Comments O5-2-1** through **O5-2-25**.

O5-9

Air quality is analyzed in Section 5.3, Air Quality. As disclosed in the Draft EIR, SANDAG’s 2050 Regional Growth Forecast estimates the City would grow by an additional 5,435 units per year, from 2020 through 2035. The project proposes 1,200 units that would be constructed by 2025, and therefore would not conflict with the SANDAG’s regional growth forecast. As a result, the project would not conflict with the State Implementation Plan (SIP) or Regional Air Quality Strategy (RAQS) and impacts were determined to be less than significant.

Note that the SIP and RAQS rely on growth projections from SANDAG at the City level, and not at the community plan level. Nevertheless, the City has not grown at the anticipated rate on a yearly basis to date. From 2015 through 2018, for instance, the City added 5,308 units per year (City of San Diego 2019). Thus, the SANDAG forecast, which forms the basis for the SIP and RAQS, is considered to be conservative.

In addition, the City’s 2020 Housing Element was

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the EIR must analyze whether the Project, combined with other known projects, would not contribute to growth exceeding SANDAG's projections.

- The EIR lacks factual support for its conclusion that construction odors will not occur at magnitudes that would affect a substantial number of people. EIR at 5.3-36. A current household population of 13,104 people live in the Carmel Mountain Ranch Community Planning Area and the lands encircling the site are developed entirely residential. EIR at 5.14-5. The EIR must explain how it determined this surrounding population was not a substantial number of people and how they would not be impacted by odors. A greater number of people are working from home during the COVID-19 pandemic and are likely to be present nearby while construction produces odors through the day. The analysis must take into account these impacts and provide mitigation if impacts are significant.

The EIR fails to adequately analyze impacts to biological resources.

The Environmentally Sensitive Lands regulations require that development minimize impacts to certain sensitive biological resources including but not limited to Multi-Habitat Planning Area lands in the Multiple Species Conservation Program Subarea Plan. EIR at 2-5; San Diego Municipal Code § 143.0101. Impacts to State or Federally listed species and all narrow endemics should be considered significant. EIR at 5.4-18. The Project site contains environmentally sensitive lands due to the presence of sensitive biological resources, uplands, floodplains, and wetlands. EIR at ES 3-12; 2-5.

- Reports prepared for the Project on the site revealed biological resources that are not identified in the EIR. See the attached report from biologist Robb Hamilton, incorporated by reference.
- Many plant species, including some special-status taxa, are annuals detectable only during their spring flowering period. Thus, it is to be expected that many additional plant species are present on the project site that have not yet been detected. Letter from Robert Hamilton, p. 8; therefore, biological surveys conducted for CEQA purposes normally include spring botanical surveys.
- Just as no spring surveys were conducted for special-status plants, the EIR failed to conduct appropriate surveys for special-status wildlife species. As a result, the EIR lacks adequate survey data to report upon the status of many wildlife species on the project site. Letter from Robb Hamilton, p. 13.
- The EIR failed to acknowledge the project site contains suitable habitat for several listed species. Letter from Robb Hamilton, p. 14-17.
- The EIR acknowledges the gnatcatcher is a federally listed threatened species, a species of special concern, and Multiple Species Conservation Program covered species, and that the Project will indirectly impact the gnatcatcher. Biological Technical Report at 25, 37. Given that the gnatcatcher was observed within the Project site, the analysis has not explained its conclusion

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adopted while the Draft EIR was being prepared, and allocated 1,200 units to the project site. In light of that fact, direct and cumulative population and housing impacts were revised to less than significant in the Final EIR. Refer to **Master Response 9**.

The Draft EIR's conclusion that odors would not affect a considerable number of persons is not based on the total number of people living in the surrounding community, as the comment implies. Rather, as discussed in detail in Section 5.3.4 of the Draft EIR, the impacts to sensitive receptors were evaluated with respect to concentrations of diesel particulate matter—the primary source of construction-related odors—in the health risk assessment prepared for the project. The health risk assessment determined that the project would have a less than significant impact during construction as emissions of diesel particulate matter would not exceed concentration levels that are set by the San Diego Air Pollution Control District (SDAPCD). These significance levels represent the point at which concentrations would be deemed healthy for the public and sensitive receptors. Moreover, Section 5.3, Air Quality and Odor, of the Draft EIR explains that SDAPCD Rule 51 prohibits emission of objectionable odors that would affect a considerable number of off-site receptors. The project will be required to comply with this rule. In addition, as stated in Section 5.3, Air Quality and Odor, the project will be using Tier 4 construction equipment as required as a condition of approval, which is equipped with diesel particulate filters that trap over 85% of diesel particulate matter.

The application of architectural coatings and asphalt paving would generate odors that would disperse rapidly due to the low concentrations used during application and the prevailing meteorological conditions on site. The meteorological data provided by the SDAPCD for the health risk assessment shows the prevailing wind blows from the northwest with calm periods only 3% of the time. Furthermore, the calm periods occur during the night-time when construction would not occur. The project does not include a land use associated with odors (i.e., landfill, wastewater treatment plant, dairy farm, etc.) and as a result, the project would not cause odors during operation. Thus, the project would not result in a significant odor impact.

- O5-11** Comment noted. The comment does not raise any specific issues relating to the adequacy of analyses contained within the Draft EIR.
- O5-12** Refer to **Response to Comments O5-3-1** through **O5-3-39**.
- O5-13** Refer to **Response to Comment O5-3-3**.
- O5-14** Refer to **Response to Comments O5-3-3** and **O5-3-15**.
- O5-15** Section 5.4 acknowledges suitable habitat for the listed least Bell's vireo and the California gnatcatcher. The other species referenced in the comment are considered sensitive but are not listed. Refer to **Response to Comment O5-3-26**.
- O5-16** As stated in Section 5.4.3 of the Draft EIR, coastal California gnatcatcher was observed only in a portion of the project site that will not be developed; therefore, this species would not be directly impacted by the proposed project.

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- that the Project will not result in direct impacts to the gnatcatcher, especially where indirect noise impacts to wildlife, including the gnatcatcher, would be potentially significant. EIR at 5.4-20; EIR at ES-9.
- The EIR lacks evidence in support of its conclusion that no direct impacts to special-status wildlife would occur; it admits 11 special-status species could be present on the Project site but provides no explanation of why the Project will not cause direct impacts to these species. The EIR's reliance on the assumption that the species would be restricted to the native habitat that occurs outside the development is not substantial evidence supporting a finding of no impacts. EIR at 5.4-19.
 - The analysis claims on-site wetlands would not be impacted directly. ES 2-5; 5.4-24. However, the Project notes direct impacts to at least 6.29 acres that are designated as wetlands by the City of San Diego Biology Guidelines. EIR at 5.4-25; 5.4-3. The EIR's reliance on the installation of a brow ditch, pedestrian bridges, maintenance activities, and brush management is insubstantial evidence that no significant direct impacts will occur to wetlands. For instance, it is easy to imagine humans will interact with, thus impact, Chicarita Creek along any of the five pedestrian bridges.
 - The analysis assumes, without any support, that vibration from roadways is "not perceptible" outside of the right-of-way. EIR at 5-11.3. The EIR and Biological Technical Report fail to consider whether vibration may be perceptible to and impact sensitive biological resources. At least one study supports the finding that vibration can adversely impact the successful breeding of sensitive animals such as amphibians.¹ In another study, the finding that lab mice hear less noise than humans suggested vibration from construction would cause greater concern.²
 - The Project is within the Multiple Species Conservation Program. EIR at 5.1-14. The Project site supports habitat for upland species, including wetland and freshwater marsh habitats that support sensitive wetland species. EIR at 5.4-10. The project will also result in impacts to many wildlife species identified in the applicable plans. The areas associated with Chicarita Creek support special-status riparian bird species. EIR at 5.4-10. Listed wildlife species, including Cooper's hawk, orange-throated whiptail, Blainville's horned lizard, coastal California gnatcatcher, least Bell's vireo, and Townsend's big-eared bat, are known to occur in the surrounding region and within the project's vicinity. EIR at 5.1-13. The San Diego desert woodrat, southern California

¹ Valentina Caorsi, et. al., *Anthropogenic Substrate-Borne Vibrations Impact Anuran Calling*, Scientific Reports 9, 19456 (2019).

² John N. Norton, et. al., *Comparative Vibration Levels Perceived Among Species in a Laboratory Animal Facility*, Vol. 50, Journal of the American Association for Laboratory Animal Science: JAALAS, 653-659 (2011).

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Indirect impacts to special-status wildlife including coastal California gnatcatcher, are addressed in Section 5.4.3 of the Draft EIR and Section 6.1.1 of the Biology Report. The City has taken authority for the California gnatcatcher outside of the MHPA; so indirect impacts would not be significant.

O5-17

Section 5.4, Biological Resources, of the Draft EIR states that none of the special-status species with the potential to be present on the project site would be within the proposed development footprint. As shown in Draft EIR, Table 5.4-3, the project will directly impact approximately 70.88-acre of developed land/disturbed habitat which is not considered sensitive, and thus has no value as habitat to any sensitive species. Therefore, no direct impacts would occur; however indirect impacts to least Bell's vireo, yellow warbler, and the Copper Hawk would occur. Mitigation would reduce impacts to below a level of significance.

O5-18

Refer to **Response to Comment S2-7**.

O5-19

Section 5.11, Noise, of the Draft EIR states that groundborne vibration will generally result during construction and will not occur after construction ends. The vast majority of the development will occur within and adjacent to existing development and is located away from any vegetation which may support sensitive wildlife species. The only exception is the development of Unit 5 which is located within 100-feet of Chicarita Creek (see Figure 5.4-1B), but is also located in-between existing development.

Development of Unit 5 closest to the creek is expected to occur over a 60-day period. Section 5.11.1 of the Draft EIR states that vibration from roadways is considered to be the primary source of groundborne vibration within the project area. Only a portion of the total 60-day work period will cause groundborne vibration from heavy truck traffic on the road. This short-term condition would not be considered a significant impact to special-status wildlife species.

- O5-20** Both direct and indirect impacts to sensitive species with the potential to occur on-site are analyzed in Section 5.4, Biological Resources of the Draft EIR, and in the biological technical report appended to the Draft EIR. Refer to **Response to Comments O5-16** and **O5-17**.

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legless lizard, white-tailed kite, and San Diego pocket mouse are additional sensitive wildlife species with moderate to high potential to occur in the Project site. Biological Report at 23. Cooper's hawk, yellow warbler, least Bell's vireo, and coastal California gnatcatchers are all special-status birds nesting adjacent or within the project area that the Project admits it will impact indirectly. EIR at 5.1-14. Although the analysis notes the presence of these species, it does not describe the impacts the Project will have on them.

- Although it accounts for construction-related noise, the analysis is silent on whether operational noise may impact breeding wildlife and whether such impacts would be significant. EIR at 5.4-19. Many studies find anthropogenic noise adversely impacts wildlife procreation, particularly birds.³

The EIR fails to adequately analyze energy impacts.

- The EIR fails to explain why the Project's operational use will not substantially increase the consumption of electricity, natural gas, or petroleum. The EIR fails to provide factual support for its conclusion that the Project's overall energy and natural gas consumption for construction would be negligible. EIR at 5.5-9. The EIR described petroleum consumption for construction but did not determine whether such use was substantial. *Id.* The analysis lacks any evidence in support of its conclusion that electricity, natural gas, and petroleum consumption from construction of the Project would be inefficient or wasteful and that impacts would be less than significant. EIR at 5.5-16—5.5-17.
- The analysis of operational electricity emissions relies entirely on default rates, which assume compliance with California building standards, and on voluntary measures and the CAP Checklist. EIR at 5.5-9. Reliance on the CAP may only support a cumulative impacts analysis of GHG emissions, not all energy impacts. EIR at 5.7-15. The fact that the Project may meet building standards does not establish its impacts from transportation activities are insignificant; rather than engaging in analysis, the EIR assumes fuel efficiency by residents will increase over the Project's lifetime based on future legislative goals. EIR at 5.5-16.

The EIR fails to adequately analyze impacts to greenhouse gas emissions.

³ Rien Reijnen, Ruud Foppen, *Impact of Road Traffic on Breeding Bird Populations*, in *The Ecology of Transportation: Managing Mobility for the Environment*, 255-274 (2006); Tracy Mulholland, et. al., *Effects of Experimental Anthropogenic Noise Exposure on the Reproductive Success of Secondary Cavity Nesting Birds*, Vol. 58, Issue 5, *Integrative and Comparative Biology*, 967-976 (2018).

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The project will not result in excessive operational noise impacts that would affect sensitive wildlife.

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The Draft EIR provides an analysis of the project's potential energy impacts and estimates the project's consumption of diesel, gasoline, and petroleum in Section 5.5, Energy. The analysis uses the estimated carbon dioxide (CO₂) emissions from the CalEEMod outputs and a carbon emission factor for each fuel to estimate the number of gallons of petroleum consumed during construction and operation. The CalEEMod estimates CO₂ emissions from off-road equipment based on number, type, horsepower, load factor, hours used per day, days used per year, and emission factors from CARBs OFFROAD2011 model. For mobile sources (worker vehicles, vendor trucks, and haul trucks), CalEEMod estimates CO₂ emissions based on number of trips per day, miles per trip, days per phase, and emission factors from the CARBS EMFAC2014 model. The Climate Registry publishes CO₂ emission factors for various fuels used in mobile sources to be used to convert emissions of CO₂ into gallons or other volumes of fuel (depending on the fuel). These factors are typically represented in kilograms of CO₂ per gallon of fuel. These estimates are then compared to estimated petroleum use within the County, which is the most granular level of data available. Compared to County consumption, the project would be a small fraction of the demand for energy resources. The Draft EIR then explains why the project estimates do not indicate that "wasteful, inefficient, or unnecessary" consumption of energy resources will occur.

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The Draft EIR concludes that electricity used for construction activities would have a negligible contribution to the project's overall energy consumption. Section 5.5, Energy, of the Draft EIR explains that during construction, electricity use is only required for as-necessary lighting and computers used inside temporary construction trailers. The majority of construction energy use would be in the form of petroleum fuel consumed by construction equipment. Tables 5.5-2, 5.5-3, 5.5-4, and 5.5-5 indicate how much petroleum fuel is anticipated to be required during construction. Based on a comparison of the project's anticipated construction fuel demand and the County's overall fuel consumption, the Draft EIR concluded that although the project would increase petroleum use, petroleum consumption would not be inefficient or wasteful, and therefore would result in a less than significant impact.

Regarding the project's operational energy use, the project would be constructed in compliance with Title 24 standards and meet California Building Energy Efficiency Standards, which improve energy efficiency of residential and nonresidential buildings, and therefore reduce reliance on electricity and natural gas (CEC 2019). Further, the project would implement all Step 2 measures as required under the City's Climate Action Plan Consistency Checklist as a condition of approval, which minimize project energy through features such as installation of roofing materials with a minimum solar reflection index, low-flow water fixtures, and appliances that would indirectly reduce electricity consumption. During operation, fuel efficiency is reasonably expected to increase over time, and Compliance with the City's Mobility Choices Program ~~(some measures are included as mitigation and some~~

are included as conditions of approval (see **Response to Comment O5-40**)) would reduce fuel demand by promoting alternative modes of transportation. Overall, the Draft EIR concluded that impacts to energy would be less than significant during construction and operation.

O5-23 The Draft EIR does not solely rely on compliance with the City's Climate Action Plan to demonstrate less than significant energy impacts, as discussed in Section 5.5, Energy. Refer to **Response to Comment O5-22**.

The project would be constructed consistent with all relevant and enforceable statutes, permits, regulations and conditions in effect at the time the project is constructed. Consistency with such regulations, including California Building Code standards, is ensured through standard conditions of approval, plan check, building permit issuance, routine site inspections and through the issuance of certificates of occupancy.

As described in Section 5.5, Energy of the Draft EIR, there are various regulations that require and encourage increased fuel efficiency over time, including regulations on passenger vehicles, voluntary or mandated hybrid or electric vehicles, or voluntary or enforced advances in fuel economy. The project does not conflict with implementation of those regulations since, as explained in Table 5.7-1 of the Draft EIR, the project will comply with Climate Action Plan Consistency Step 2, Checklist Item 3 – Electric Vehicle Charging.

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- The EIR relies exclusively and incorrectly on the CAP Consistency Checklist to conclude the Project would not directly or indirectly generate greenhouse gas emissions that would have a significant impact. EIR at 5.7-23. Review of the City's CAP reveals that the proposed Project is inconsistent with numerous measures. Letter from Swape Technical, p. 32-37. The California Supreme Court has noted: "That a project is designed to meet high building efficiency and conservation standards, for example, does not establish that its greenhouse gas emissions from transportation activities lack significant impacts." *Center for Biological Diversity v. Dept. of Fish and Wildlife* (2015) 62 Cal.4th 204, 229.
- On April 29, 2015, Governor Brown issued Executive Order B-30-15, which establishes a "new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030." The EIR does not address compliance with Executive Order B-30-15.

The EIR fails to adequately analyze impacts to noise.

- The Project will negatively impact ambient noise conditions. The analysis fails to adequately account for existing noise conditions. See the attached comments from Bryan Estrada, incorporated by reference.

The EIR fails to adequately analyze impacts to population and housing.

- The EIR admits the Project will have a significant impact to population and housing because it will induce population that substantially exceeds current projections by the SANDAG. EIR at 5.13-7. Indeed, the Project is not accounted for in adopted plans or forecasts and would directly induce substantial unplanned population growth to the area. EIR at 5.13-7. The impact analysis lacks the requisite description of the nature and magnitude of the adverse effects of this unplanned population growth.

The EIR fails to adequately analyze impacts to water quality.

- The EIR impermissibly relies on the probability that applicable regulations will be followed to find no adverse impacts from both the short-term construction and long-term operation of the Project. See the attached comments from hydrologist Richard Horner, incorporated by reference.

III. The EIR Fails to Adequately Analyze Cumulative Impacts.

A discussion of cumulative impacts requires a two-fold analysis; first, the EIR must determine whether the combined effects from the proposed project and other projects would be cumulatively significant. If the EIR determines the combined effects would be cumulatively significant, it must next determine whether the project's

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O5-24 Refer to **Master Response 8.**

O5-25 The Draft EIR specifically discusses Executive Order B-30-15 in Section 5.7, Greenhouse Gas Emissions. The Draft EIR also explains in Section 5.5, Energy, that the City's Climate Action Plan establishes reduction targets for 2020 and 2035. Therefore, consistency with the City's Climate Action Plan indicates that the project is also consistent with Executive Order B-30-15. Also refer to **Response to Comment O1-28.**

O5-26 Refer to **Response to Comments O5-8-1** through **O5-8-7.**

O5-27 Refer to **Master Response 9.**

O5-28 Refer to **Response to Comments O5-9-1** through **O5-9-10.**

O5-29 The comment provides general guidance regarding CEQA. The comment does not raise any specific issue relating to the adequacy of analyses contained within the Draft EIR, and therefore, no further response is required.

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incremental effects are cumulatively considerable. *Communities for a Better Environment v. California Resource Agency* (3d Dist. 2002) 103 Cal. App. 4th 98, 120.

The need for such assessment reflects the fact that, although a project may cause an “individually limited” or “individually minor” incremental impact that, by itself, is not significant, the increment may be “cumulatively considerable,” and thus significant, when viewed together with environmental changes anticipated from past, present, and probable future projects. CEQA Guidelines §§ 15064(h)(1) (a copy has been attached for your convenience). When relying on a plan, regulation or program, the EIR should explain how implementing the particular requirements in the plan, regulation or program ensure that the project’s incremental contribution to the cumulative effect is not cumulatively considerable. CEQA Guidelines §§ 15064(h)(3).

- The EIR fails to analyze the combined emissions of construction with other proposed or reasonably foreseeable future projects under the first step of the cumulative impacts analysis to determine whether the Project will contribute to a significant cumulative impact. EIR at 5.13-8.
- The EIR fails to support its conclusion that the Project would not result in cumulatively considerable impacts from operational emissions with substantial evidence. The EIR states energy impacts would not be cumulatively considerable because the surrounding projects under review would be required to comply with energy efficiency standards and the California Green Building Standards Code. EIR at 6-5. The EIR did not explain how other projects’ future compliance with either regulation renders the Project’s incremental contribution to operational emissions not cumulatively considerable. CEQA Guidelines § 15064(h)(3).
- The Project proposes development greater than that anticipated in the local plan and SANDAG’s growth projections; indeed, the EIR admits the SANDAG forecasted no change in housing stock with only minimal change in population for the Carmel Mountain Ranch community. EIR at 5.13-7. Therefore, the analysis incorrectly concluded the project is not in conflict with the SIP and Regional Air Quality Strategy and will not contribute to a potentially significant cumulative impact on air quality. Air Quality Technical Report at 35.
- The EIR assumes land use impacts would not be cumulatively considerable because the surrounding projects under review would be required to comply with the General Plan, applicable Community Plans, and existing zoning. EIR at 6-2. The Project is also inconsistent with the Housing Element of the General Plan. Compliance with the Plans is not substantial evidence that the Project’s incremental contribution to cumulative effect is not cumulatively considerable.
- The EIR claims impacts to biological resources would not be cumulatively considerable because mitigation requires construction outside of breeding

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Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SDAPCD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are relevant in the determination of whether a project’s individual emissions would have a cumulatively significant impact on air quality. With regards to cumulative Air Quality impacts, the analysis focuses on whether a specific project would result in a cumulatively considerable increase in emissions. By its very nature, air pollution is largely a cumulative impact. The San Diego Air Basin is considered a moderate nonattainment area for the 8-hour NAAQS for O₃, and a nonattainment area for the CAAQS for O₃, PM₁₀, and PM_{2.5}. According to Section 5.3, Air Quality and Odor, of the draft EIR, the project would not conflict with implementation of the RAQS.

Furthermore, as discussed in Section 5.3.4, and Chapter 6, Cumulative Effects, the project’s construction emissions would not exceed the screening level thresholds for criteria pollutant emissions and would not contribute to existing violations of the respective standards. Future projects would be subject to CEQA and would require an air quality analysis and, where necessary, mitigation if the project would exceed SDAPCD’s significance thresholds. Therefore, impacts are not considered cumulatively considerable. Cumulative impacts related to construction emissions would not be significant.

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O5-31 Refer to **Response to Comment O5-30** for information on the cumulative air quality analysis.

As shown in Section 5.5.3, and Chapter 6, Cumulative Effects of the Draft EIR, the project was shown to not result in a wasteful or inefficient use of energy or conflict with applicable plans and would result in a less than significant impact. Other projects would be subject to local and statewide regulations to limit energy use, such as Title 24, CALGreen, and the City's Climate Action Plan. As shown in Section 5.5 of the Draft EIR, the project's energy use would consist of 0.001% of the County's demand. Therefore, the project would not result in a cumulatively considerable energy impact.

O5-32 Refer to **Response to Comments O5-8, O5-9, O5-30** and **O5-31**.

O5-33 As described in Chapter 3, Project Description, of the Draft EIR, the proposed project would include a General Plan Amendment to redesignate the land from Park, Open Space & Recreation to Residential and Commercial Employment, Retail, & Services uses. As explained in **Master Response 1**, and Table 5.1-2 and Table 5.1-3 of the Draft EIR, the project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan. In addition, the City's 2020 Housing Element that was adopted while the Draft EIR was being prepared, accounted for 1,200 units on the project site as part of its site inventory analysis. Refer to **Master Response 9**. As disclosed in Draft EIR Chapter 6, Cumulative Effects, the project would not result in a cumulatively considerable land use impact.

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season. EIR at 6-4. As noted, the mitigation as proposed actually allows for construction during the breeding season and defers mitigation. EIR at 5.4-21. Thus, the EIR lacks substantial evidence that mitigation ensures the Project's contribution is not cumulatively significant. CEQA Guidelines § 15064(h)(3).

- The Project and cumulative projects would result in an increase of impervious surfaces in the area by at least 63.1 acres. EIR at 6-7; 5.10-5. The EIR admits surrounding large development projects would increasingly convert pervious areas to impervious. EIR at 6-7. The EIR claims the Project's contributions to a cumulative hydrology impact would not be cumulatively considerable because it assumes other projects will ensure their runoff flows can be accommodated by the regional system. EIR at 6-7. Reliance on other projects' future compliance is insufficient evidence that the Project's contribution to a cumulative hydrology impact would not be cumulatively considerable.

III. The EIR's Discussion of Mitigation and Alternatives is Deficient

CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects." *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. Where an EIR has identified significant environmental effects that have not been mitigated or avoided, the agency may not approve the project unless it first finds that specific economic, legal, social, technological, or other considerations the mitigation measures or alternatives identified in the environmental impact report are infeasible. Pub. Res. Code § 21081, subd. (a)(3); Guidelines, § 15091, subd. (a)(3). For these purposes, rejected alternatives must be "truly infeasible." *City of Marina v. Board of Trustees of the California State University* (2006) 39 Cal.4th 341, 369; see also CEQA Guidelines § 15126.6(b).

An EIR "shall describe" feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy. CEQA Guidelines § 15126.4(a). The City's claims "of infeasibility [are not] supported by substantial evidence," particularly since the EIR fails even to discuss or consider possible mitigation. *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 100 (citing Pub. Res. Code § 21081.5; CEQA Guidelines § 15091(b)). For each significant effect, the EIR must identify specific mitigation measures; where several potential mitigation measures are available, each should be discussed separately, and the reasons for choosing one over the others should be stated. *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 653 (quoting *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1027).

Formulation of mitigation measures shall not be deferred until some future time. CEQA Guidelines § 15126.4(a)(1)(B); *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App. 4th 70, 92. Modifications incorporated into the project, whether required or not, which avoid or substantially lessen the significant

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The Final EIR now echoes the text of Appendix I, which states that the "MSCP planning effort is designed to address cumulative impacts through development of a regional plan that addresses impacts to covered species and habitats in a manner that assures their conservation despite impacts of cumulative project over the long term. The goal of this plan is the establishment of biological reserve areas in conformance with the State of California Natural Communities Conservation Planning Act. Cumulative impacts to sensitive vegetation communities or special-status species from implementation of the project are not expected since all activities are located outside of the MHPA and the project would not result in impacts to any sensitive resources." Furthermore, the Draft EIR identifies one biological resource mitigation measure, Mitigation Measure BIO-1, to address impacts to birds protected under the MBTA and another measure specific to least Bell's vireo (MM-BIO-2) (note that this measure was combined with MM-BIO-1 in the Draft EIR).

O5-35

As described in Section 5.10, Hydrology, of the Draft EIR, the project would increase the quantity of runoff, however, the project would provide on-site improvements consistent with applicable regulations, to be verified during final engineering, thereby ensuring increased runoff flows would not leave the site. Therefore, impacts were determined to be less than significant. Regarding cumulative impacts, as described in Chapter 6, Cumulative Effects, all cumulative projects would be required to comply with applicable regulations ensuring post-development surface runoff flows can be accommodated by the

regional drainage system. Therefore, cumulative impacts were determined to be less than significant.

- 05-36** The comment provides general guidance regarding CEQA. The comment does not address the adequacy of the Draft EIR.

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environmental effect as identified in the final EIR shall be supported by substantial evidence in the record. CEQA Guidelines § 15091(a)-(b).

A. The EIR's Discussion of Mitigation is Insufficient

The implementation of the Project would result in significant impacts to transportation/circulation, biological resources, historic resources, noise, population and housing, public services (libraries), public utilities, and tribal cultural resources (TCR). The EIR must describe features that may minimize or avoid impacts to each of these topics and provide its reasoning for choosing one method over others.

- The EIR did not explain its conclusion that no feasible mitigation exists to reduce or avoid potentially significant impacts to population and housing "absent a feasible alternative," especially in light of the fact it designed the Reduced Density and Reduced Footprint Alternatives. EIR at 5.13-8. The EIR fails to analyze whether impacts to population and housing would remain significant with mitigation because it concluded mitigation was infeasible. The EIR's conclusion that no feasible mitigation exists lacks evidence because either Alternative would reduce population and housing footprint.
- The EIR acknowledges impacts to public services, particularly the library facilities at Carmel Mountain Ranch Library, would be significant and unavoidable. By taking the position that no mitigation is feasible as long as no capital improvement or fee program has been established, the EIR admits such measures would in fact mitigate the impacts and inappropriately defers mitigation of impacts to public services. EIR at ES-34.
- The EIR does not explain why the creation of either the capital improvement or fee program is infeasible and ignores the possibility of other mitigation measures. The Project will pay an impact fee to "support expanded library services" to remain consistent with the Carmel Mountain Ranch Community Plan Public Facilities and Services Element. EIR at 5.1-127. The EIR may not rely on the impact fee alone to qualify as mitigation; to count as mitigation, the Project must prove expansion of library services is actually in progress, which it cannot do. *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal. App. 99, 140.
- The EIR claims incorporation of VMT reducing measures under the Mobility Choice Program reflects its mitigation "to the extent feasible." VMT Analysis at 3. The Project identified and selected from the list of VMT reducing measures in accordance with *Land Development Manual, Appendix T*; yet, the Project will continue to have "significant and unavoidable VMT impact." VMT Analysis at 3, 12-13. However, relying on the City's Complete Communities Mobility Choices Program, the EIR only discusses two VMT reducing measures, bicycle repair stations and bicycle parking spaces, as

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O5-37

O5-38

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O5-37

As explained in **Master Response 9**, the Final EIR concludes the project will not have a significant impact in light of the City's recent update to the General Plan Housing Element. As such, there is no need for mitigation.

O5-38

Refer to **Master Response 6**.

O5-39

Refer to **Master Response 6**.

O5-40

To clarify, Section 5.2, Transportation, of the Draft EIR, only includes the mitigation needed to comply with the City's Complete Communities Mobility Choices Program. Thus, the analysis only refers to installation of the bicycle repair stations and bicycle parking spaces (6 points). The following measures are included as mitigation and will be part of the project's MMRP:

- Three on-site public bicycle repair stations
- On-site public bicycle parking spaces (each Unit will provide short-term bicycle parking 10% beyond the minimum requirements for public use)

In addition, the vehicle miles traveled analysis identifies several other measures that will be included, above and beyond what is required in order to comply with the Mobility Choices Program, and included as conditions of approval. These additional measures are as follows:

- Pedestrian resting area located adjacent to the public park within Unit 13.
- On-site shared bicycle fleet

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possible mitigation for the Project's significant transportation impacts. EIR at ES-7 – ES-9 & 5.2-9. The EIR fails to discuss multiple potential mitigation measures identified by the Project's own VMT Analysis that would reduce VMT impacts including pedestrian rest areas, an on-site bicycle fleet, multi-modal informational kiosks, and transit subsidies. EIR, Appendix G at 12-13. In addition to repair stations and parking spaces, the VMT Analysis suggests installing pedestrian resting area/recreation nodes maintained by the property owner, providing an on-site shared bicycle fleet, providing an on-site multi-modal kiosk displaying bike/pedestrian/transit facility information, and transit subsidies for residents of Units 5 and 6. EIR, Appendix G at 12-13. The EIR fails to incorporate any of these feasible mitigation measures. See generally EIR Chapter 10 [MMRP]. Finally, the EIR fails to consider other feasible mitigation measures beyond those it identifies from the City's Mobility Choices Program.

- The EIR fails to discuss other feasible measures to mitigate transportation and VMT generating impacts. For example, the EIR could have considered infrastructural improvements or payment of in-lieu fees that could be used to improve or complete infrastructure that would reduce VMT. The Project's Local Mobility Analysis notes that there are bicycle facilities within the Project vicinity, planned per the Community Plan and City Bicycle Master Plan, that have not been completed. EIR, Appendix C at 77. It identifies five bicycles paths or routes, ranging from Class I to Class III, that have yet to be implemented. *Id.* Several of the planned facilities are located in a manner that integrates well with the Project. (The highlighted portions of the attached copy of EIR Figure 3-1 depict the approximate locations of the planned facilities). Despite admitting significant transportation impacts and VMT generation, the EIR fails to consider feasible mitigation such as requiring the Project implement portions of the planned facilities or pay in-lieu fees to fund a portion of their completion. Courts have discussed mitigation for traffic impacts, noting: "Fee-based infrastructure mitigation programs have been found to be adequate mitigation measures under CEQA." *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 140. Such measures "can be particularly useful where, as here, traffic congestion results from cumulative conditions, and not solely from the development of a single project." *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 363.
- The Project will have major impacts to two streets including Carmel Ridge Road and Windcrest Lane. These locally designated streets in the Carmel Mountain Ranch Community Plan are projected to exceed their design capacity as local streets with the proposed project. No mitigation measures are designed for these two impact roadways. These streets were incorrectly

O5-40
Cont.

O5-41

O5-42

O5-41

- Public multi-modal informational kiosk in Unit 17
- Transit subsidy for residents of Units 5 and 6

As discussed in Section 5.2, Transportation, of the Draft EIR, all planned bicycle facilities per the Carmel Mountain Ranch Community Plan and Bicycle Master Plan have been constructed and the project is not anticipated to generate enough bicycle demand to warrant additional upgrades to these facilities.

The project complies with the City's Complete Communities Mobility Choices Program through the installation of bicycle repair stations and bicycle parking spaces (for a total of 6 points). The project is not subject to in-lieu fees because of its location in Mobility Zone 2.

O5-42

Carmel Ridge Road and Windcrest Lane function as 2-lane collectors and are each 40 feet wide. The roadway segment analysis provided in the Local Mobility Analysis (Draft EIR Appendix C) showed that these roadway segments would operate at LOS C or better (with and without the project for all study years).

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- analyzed as collector streets, yet they have direct driveway access by the existing single-family homes.
- The Technical Report recommended mitigation that construction within 300-feet of suitable habitat, including habitat removal, shall occur outside of the breeding season for these species (February 1 to September 15) to avoid significant indirect impacts to the wildlife. Biological Technical Report at 37; EIR at ES-10, 5.4-20, 5.4-21. This mitigation conflicts with the fact that Cooper's hawks defend an area of 330 feet around nest sites. EIR at 5.4-10.
 - The analysis has not supported its conclusion that it will mitigate impacts to biological resources a less-than-significant level. EIR at 10-4. Significant impacts to special-status wildlife will occur if construction occurs during breeding season and the selected mitigation allows for construction during the breeding season. EIR at 5.4-21; EIR at 5.4-20.
 - The EIR fails to mitigate impacts to California gnatcatchers by relying on the species' location outside of the Multi-Habitat Planning Area. EIR at 5.1-14.
 - The EIR admits noise levels associated with outdoor recreation and events have a potentially significant impact; the chosen mitigation to biological resources does not consider these impacts. ES-33.
 - The analysis offers no mitigation to offset potential indirect impacts to the long list of sensitive wildlife resources found in or near the Project site. EIR at 5.1-14. The Report is missing discussion of the mitigation measures it considered to avoid impacts to all but three sensitive species (Cooper's hawk, least Bell's vireo, and yellow warbler).
 - The EIR improperly deferred the formulation of mitigation measures to offset impacts to wildlife resources because it fails to commit the agency to specific performance criteria for evaluating the efficacy of the measures to be implemented; the Project allows the removal of habitat during breeding season so long as the Project provides a report or mitigation plan for approval and approved measures will be place before construction. ES-10—ES-12; *POET, LLC v. State Air Res. Bd.* (2013), 218 Cal. App. 4th 681, 738.
 - The EIR fails to address whether mitigation designed to address the potentially significant impacts caused by continuous residential mechanical noise will reduce the impacts to a level below significance. EIR at ES-30.
 - The EIR has not adequately demonstrated how mitigation measure MM-NOI-1 will effectively reduce the impact to less than significant levels. See the Letter from Bryan Estrada.
 - The EIR fails to analyze the feasibility of other mitigation measures to reduce impacts to greenhouse gas emissions because it relies entirely on the CAP Consistency Checklist to find no significant impact. EIR at 5.7-23.

B. The EIR's Discussion of Alternatives is Insufficient

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O5-44
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O5-43

The 300-foot avoidance buffer is based on the City's MSCP conditions of coverage for Cooper's hawk. Therefore, this disturbance buffer is considered adequate.

O5-44

Refer **Response to Comment O5-17**. As described in mitigation measure MM-BIO-1, in Draft EIR Section 5.4, Biological Resources and Chapter 10, MMRP, if sensitive species are detected during pre-construction surveys, the preparation of a letter report detailing additional protective measures in conformance with local, state and federal regulations would be required prior to initiation of construction activities.

O5-45

Refer to **Response to Comment O5-16**.

O5-46

Potential impacts associated with noise impacts from outdoor recreation and/or events is analyzed in Section 5.11, Noise, of the Draft EIR. The following information was included as MM-NOI-3 in the Draft EIR, but since it reflected applicable law, it was not an appropriate has been revised in the Final EIR to be included as part of the project and not a standalone mitigation measure and the Final EIR has been revised accordingly. As stated therein, noise from recreation activities and community events would be reduced through site design and limits on event capacity, allowable equipment, and operational hours. Proposed recreational activity areas shall be located in a manner to minimize noise exposure at surrounding noise-sensitive receptors. Use of recreational areas adjacent to noise-sensitive receptors shall be limited to daytime hours (7:00 a.m. to 7:00 p.m.), with the exception of temporary

use permits granted by the City Manager. In addition, any activities that generate noise within areas in proximity to least Bell's vireo would be required not to exceed 60 A-weighted decibels (dBA).

- O5-47** The list of special-status plant and wildlife species observed or with potential to occur on site is based on the entire project site, which includes portions of native vegetation, including communities that can provide habitat for special-status species. However, because project impacts are entirely restricted to the currently developed land/disturbed habitat that do not support special-status species, no direct impacts would occur, and no mitigation is required.
- O5-48** Project compliance with state and federal migratory bird regulations is required. The mitigation measures outlined within the ~~d~~Draft EIR appropriately identify triggers for when the mitigation measures are required, when they would be implemented, and identification of responsible parties. Therefore, the EIR has not improperly deferred mitigation measures.
- O5-49** Mitigation Measure NOI-2 requires verification, prior to issuance of a building permit, that mechanical noise levels meet applicable City noise thresholds, which appear in Table 5.11-3 (Applicable Noise Limits) and for receiving property lines of single-family homes are 50 dBA equivalent sound level (L_{eq}) during daytime hours, 45 dBA L_{eq} during evening hours, and 40 dBA L_{eq} during nighttime hours. With implementation of this measure, operational noise impacts associated with ~~residential~~ mechanical equipment would be less than significant.

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An EIR must “produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” *San Bernadino Valley Audubon Society v. County of San Bernadino* (1984) 155 Cal.App.3d 738, 750-51. “Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process.” *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 404. Per CEQA Guidelines, Sections 15126.6 (b) and (c), the focus of this analysis is to determine (1) whether alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of alternatives, and (3) whether an alternative meets all or most of the basic project objectives.

“[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects on the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines § 15126.6(b).

Alternatives analyzed in the EIR need not be actually feasible, but rather need only be “potentially feasible.” CEQA Guidelines, § 15125.6, subd(a); *see also Mira Mar Mobile Community v. City of Oceanside* (4th Dist. 2004) 119 Cal. App. 4th 477, 489 (although the respondent city ultimately rejected as infeasible several alternatives that were evaluated in an EIR, “this conclusion does not imply these alternatives were improperly included for discussion.”)

The EIR evaluated two alternatives: No Project, Reduced Density Alternative, and Reduced Footprint Alternative. The EIR states the Reduced Footprint Alternative would reduce impacts to historical resources, paleontological resources, and tribal cultural resources. EIR at 8-10. It states the Reduced Density Alternative would reduce impacts to air quality, energy, greenhouse gas emissions, noise, public utilities, public services, and visual effects/neighborhood character.

- The EIR acknowledges both the Reduced Density and Reduced Footprint Alternatives would reduce certain impacts and meet nearly all of the Project objectives; the EIR cannot show any of its objectives would not be realized under the Reduced Density Alternative and admits all of its objectives would be met under the Reduced Footprint Alternative. EIR at 8-10. It even acknowledges one of these, the Reduced Density Alternative, is the Environmentally Superior Alternative. EIR at ES-7. The EIR lacks any substantial evidence or reasoning as to how or why either or both alternatives are infeasible. The inability to totally avoid significant environmental impacts is only one of several factors that may eliminate alternatives from detailed consideration during the scoping process. CEQA Guidelines § 15123.6(c); the Reduced Density Alternative was not eliminated from detailed consideration

O5-52
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O5-53

O5-50 Refer to **Response to Comment O5-8-2**.

O5-51 As discussed in **Master Response 8**.

O5-52 The comment provides general guidance regarding CEQA. The comment does not address the adequacy of the Draft EIR.

O5-53 Refer to **Master Response 10**.

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and the fact that it cannot totally avoid significant impacts does not justify a conclusion that it is infeasible.

- The EIR claims that the Reduced Density Alternative would have the same footprint, and therefore the same or similar impacts. EIR at ES-6, 8-7. But it offered no reason why a reduced density alternative could not also significantly reduce its footprint, either by clustering or other mechanisms encouraged by the City's General Plan and Municipal Code, thereby also reducing impacts in several other areas, including impacts to land use, biological resources, cultural resources, greenhouse gas emissions, air and water quality, and noise.
- The Program and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the program. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d. 1438, 1455.

IV. The Need to Recirculate

The EIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

VI. Conclusion

For the foregoing reasons, Carmel Mountain Ranch Residential Community Association urges you to reject the Project and EIR as drafted. Thank you for your consideration of these concerns.

Sincerely,



Everett DeLano

Enclosures:

1. Letter from Registered Traffic Engineer, Robert Kahn, P.E (February 4, 2021);
2. Letter from Swape Technical Consultation, Inc. (February 5, 2021);
3. Letter from Robert Hamilton, Hamilton Biological, Inc. (February 8, 2021);
4. Copy of "Anthropogenic Substrate-Borne Vibrations Impact Anuran Calling" by Valentina Caorsi, et. al. (December 19, 2019);
5. Copy of "Comparative Vibration Levels Perceived Among Species..." by John Norton, et. al. (September 2011);
6. Copy of "The Effects of Car Traffic on Breeding Bird Populations..." by R. Reijnen and Ruud Foppen; (August 1995);
7. Copy of "Effects of Experimental Anthropogenic Noise Exposure..." by T. Mulholland, et. al. (January 7, 2018).

O5-54

As explained in **Master Response 10**, any development on site would result in significant and unmitigated Transportation/Circulation and public service (library) impacts. The Reduced Density Alternative was designed to reduce the overall population of the site since the Draft EIR concluded the project would result in a significant and unmitigated population and housing impact. CEQA Guidelines Section 15126.6(a) explains that an EIR need not consider every conceivable alternative to a project. Rather, the analysis must consider a reasonable range of alternatives that will foster informed decision making and public participation. Since the project would not result in significant land use, biological resource, cultural resource, greenhouse gas emissions, air quality, water quality or noise impacts, the Reduced Density Alternative did not need to cluster development and/or reduce the development footprint to address those concerns, particularly where, as here, the Draft EIR already included a Reduced Footprint Alternative.

O5-55

Comment noted. The scope of the project is reflected in the objectives, which were developed by the applicant. The project objectives were developed pursuant to CEQA Guidelines Section 15124(b), which requires that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project.

O5-56

Refer to **Response to Comment O1-66**. Therefore, recirculation is not required.

O5-53
Cont.

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O5-56

O5-57

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O5-57 Comment noted.

- 8. Letter from Bryan Estrada, RK Engineering Group, Inc. (February 5, 2021);
- 9. Letter from Richard Horner, Ph.D. (February 4, 2021).
- 10. Draft EIR Figure 3-1 (unfinished bike route)
- 11. Excerpt from the 2019 CEQA Guidelines § 15064(h)

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Comment Letter O5-1



traffic engineering & design
transportation planning
parking
acoustical engineering
air quality & ghg

February 4, 2021

Everett DeLano
DELANO & DELANO
104 W. Grand Ave., Suite A
Escondido, CA 92025

**Subject: Trails at Carmel Mountain Ranch General Plan/Community Plan
Amendment DEIR (Draft Environmental Impact Report)
Transportation Review**

Dear Mr. DeLano,

Introduction

RK ENGINEERING GROUP INC. (RK) has reviewed the Trails at Carmel Mountain Ranch General Plan/Community Plan Amendment DEIR with respect to transportation impacts to the adjoining community. The project proposes a general plan/community plan amendment to redevelop from a private recreation golf course to low – medium density residential, medium density residential, open space and other open space in the Carmel Mountain Ranch Community Plan. RK has reviewed the DEIR dated December 2020, the VMT (Vehicle Miles Traveled) Analysis dated November 13, 2020 and the Local Mobility Analysis, dated December 18, 2020, both prepared by Fehr and Peers.

O5-1-1

The project proposes to redevelop the existing 18-hole golf course with 1,200 multifamily residential units and a mix of open space and recreation areas. More specifically, the project would include 451 townhomes, 629 market rate apartments, and 120 affordable apartments. The project also proposes a future development of approximately 6,000 square feet of community commercial amenities that would include an art studio, a café/restaurant/banquet area with kitchen and a caretaker unit. The project is a major infill project within the previous Carmel Mountain Ranch Golf course which has not been operating for some time. The project will generate a substantial amount of new traffic which would include 8,282 daily trips with 657 vehicles per hour during the AM peak hour and 772 vehicles per hour during the PM peak hour. This will generate hundreds of thousands of additional vehicle miles traveled per day from an area that already generates significantly over the regional average of VMT/Capita.

O5-1-2

RK has conducted a review of the DEIR and its appendices with respect to transportation and the VMT (Vehicle Miles Traveled) impacts to the adjoining Carmel Mountain Ranch

O5-1-3

**Response to Comment Letter Enclosure O5-1
RK Engineering Group**

- O5-1-1** The comment is an introduction to the comments that follow. The comment does not raise any specific issue relating to the adequacy of the Draft EIR.
- O5-1-2** Comment noted. The comment does not raise any specific issue relating to the adequacy of the Draft EIR.
- O5-1-3** Comment noted. Refer to **Master Response 3**.



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Community. Based upon our review, there are a significant number of unmitigated impacts created by the project that will impact the Carmel Mountain Ranch Community and the region as a whole. It is recognized in the DEIR that the project will have a Significant and Unavoidable impact to the area since the residential component of the project will generate 21.4 to 23.2 VMT/Capita, whereas the City requirement is to achieve 15% below the regional average of 19.0 VMT/Capita. This conclusion is based upon the City's VMT/Capita Screening Maps. However, the City's Transportation Study Manual (TSM) requires projects of this size to use the SANDAG model to determine the actual VMT/Capita for the proposed project.

A number of proposed mitigation measures are recommended; however, they are mostly bicycle related improvements which may not actually reduce a significant amount of automobile related travel. In fact, the DEIR recognizes that "The Project is not anticipated to generate enough bicycle demand to warrant additional upgrades to existing or planned bicycle facilities". Therefore, it is not anticipated that the recommended mitigation measures would significantly change the findings of the DEIR that a Significant and Unavoidable impact will be caused by the VMT generated by the project. If any part of the proposed project is approved, substantially more improvements/mitigation measures would be needed as included in Appendix T of the City's *Mobility Choices Regulations* to help reduce the VMT Impacts of the project.

There are several concerns with the Local Mobility Analysis for the project. The project will generate a total of 8,282 daily trips of which the residential component will generate 7,928 daily trips. This is a substantial increase in traffic within the community that will affect both the arterial highway system and local streets. The project will contribute substantially to additional queuing at the intersection of Ted Williams Parkway at Shoal Creek Drive which would normally require dual left turn lanes on Ted Williams Parkway and widening of Shoal Creek Drive. No major road improvements have been recommended with the exception of some minor traffic signal upgrades and the possible addition of one traffic signal.

The project will have major impacts to two local streets including Carmel Ridge Road and Windcrest Lane. These locally designated streets in the *Carmel Mountain Ranch Community Plan* are projected to exceed their design capacity as local streets with the proposed project. No mitigation measures are designated for these two impact roadways. These streets were incorrectly analyzed as collector streets, yet they have direct driveway access by the existing single-family homes.

These comments and additional issues are identified in the comments section of this letter and need to be addressed before any further review or approval of the project is considered.

O5-1-3
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O5-1-4

O5-1-5

O5-1-6

O5-1-7

O5-1-4 Refer to **Response to Comment O5-40**.

O5-1-5 Outside of the CEQA impact analysis, the Local Mobility Analysis determines that, with the installation of a new traffic signal at Carmel Ridge Road/Ted Williams Parkway, as described in Section 3.4, Off-Site Intersection Improvements of the Draft EIR, queueing at the Ted Williams Parkway/Shoal Creek Drive intersection is expected to be reduced back to pre-project conditions. Analysis results are shown in the Local Mobility Analysis Section 8 and in Appendix D. The signal improvements will be included in the project's permit conditions of approval. No further analysis is required.

O5-1-6 Impacts associated with level of service or roadway capacity are no longer considered environmental impacts for purposes of CEQA (CEQA Guidelines § 15064.3). Because no CEQA impact is identified in relation to these streets, no mitigation measures are required. Refer to **Response to Comment O5-42**.

O5-1-7 Comment noted. Refer to **Response to Comments O5-1-1** through **O5-1-6** and **O5-1-8** through **O5-1-26**.

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Comments

These Comments are related to the VMT Study:

1. VMT Analysis and Assessment. The VMT assessment indicated that the expected project VMT of 21.4 to 23.2 VMT/Capita was obtained from the City's VMT per Capita Maps and was not specifically calculated for the project. As noted in the DEIR it would be significantly above the VMT significance threshold of 16.2 VMT/Capita which is specified for the region. However, the DEIR specifically acknowledges that the City's Transportation Study Manual (TSM) requires project's, which aren't screened out, must have their VMT analyzed. The City's TSM states: "Transportation VMT analysis for CEQA **shall** (emphasis added) be conducted using the SANDAG Regional Travel Demand Model." It explains: "Table 4 provides guidance on conducting transportation VMT analysis for CEQA based on the land use." /d. Table 4 of the TSM describes the required analysis methodology for residential projects, such as this project, which will generate greater than 2,400 daily trips. It requires: **"For projects that generate greater than 2,400 daily unadjusted driveway trips:** (emphasis added) that the project must be inputted into the SANDAG Regional Travel Demand Model for SANDAG to provide the project's VMT per Capita. To perform the analysis, all project land uses should be inputted, and the VMT/Capita should be determined using the same method/scripts that SANDAG utilizes to develop the SANDAG VMT per Capita maps."

The DEIR relies on census tract information and acknowledges it didn't run the required analysis, but instead infers that the Project will not get under the threshold. The specific VMT generated should be determined. It may be less than the census tract data, but it also could be significantly higher given the density of this Project. The full SANDAG Regional Traffic Modelling needs to be completed for the VMT evaluation to be accurate for this specific project.

2. The DEIR included a number of mitigation measures as suggested by the *San Diego Land Development Manual, Appendix T*. However, most of those measures are geared to the use of bicycle improvements and it is concluded in the DEIR that even with these mitigation measures the project will continue to have Significant and Unavoidable VMT impacts to the area and the region. The DEIR states that "The Project is not anticipated to generate enough bicycle demand to warrant additional upgrades to existing or planned bicycle facilities". Therefore, it is not anticipated that the recommended mitigation measures would significantly change the findings of the DEIR that a Significant and Unavoidable impact will be caused by the project. If the project is to be considered at all, a much larger array of the VMT reduction measures as included in *Appendix T* of the City's *Land Development Manual* will need to be provided by the project.

O5-1-8

O5-1-9

O5-1-8 Refer to **Response to Comment O5-1-3**.

O5-1-9 As stated in Section 5.2 of the Draft EIR, all planned bicycle facilities per the Community Plan and Bicycle Master Plan have been constructed and the project is not anticipated to generate enough bicycle demand to warrant additional upgrades to these facilities. Refer to **Response to Comment O5-40** and **O5-41**.

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3. Even with mitigation measures, the 7,928 total daily trips generated by the residential component of the project will result in a substantial increase in overall **total VMT** produced in the area. The 1,200 dwelling units will increase overall daily VMT by at least 169,659 VMT per day. That is a substantial increase for the entire Carmel Mountain Ranch Community and no substantial mitigation has been included in the DEIR.

05-1-10

These Comments are related to the Local Mobility Analysis

4. According to the Local Mobility Analysis (Traffic Impact Study,) the project is not anticipated to increase bicycle demand, so additional upgrades to existing or planned bicycle facilities are recommended. Yet as noted in Comment #2 above, all of the mitigation measures suggested for the VMT exceedances were based upon bicycle improvements which will have little impact to reducing traffic from the proposed project. Limited, if any additional traffic related improvements are provided by the project.

05-1-11

5. Table 4, Page 27: This table classifies Carmel Ridge Road as a collector road, whereas, it is designated as a local street in the *Carmel Mountain Ranch Community Plan* with a design capacity of 2,200 ADT. Windcrest Lane from Seabridge Lane to Shoal Creek Drive is also classified as a local street with the design capacity of 2,200 ADT. These two local street segments are significantly impacted by the project traffic and forecast to exceed their design capacity. These local streets have direct residential access (driveways) and no mitigation measures are recommended for any of these impact streets for Year 2025 and Year 2050 conditions with the project.

05-1-12

6. Figure 6B: This figure indicates the project will be contributing significantly greater traffic (over 50 peak hour trips) and 1,268 ADT to State Route 56. *Why was there no analysis of the impacts to this important State Route for future conditions (Year 2025 and Year 2050) as a result of the project's expected traffic?*

05-1-13

7. Page 34, Opening Year Traffic: *Why was no ambient growth rate applied to existing traffic for the Opening Year (2025) traffic projections?* It appears that only the 11 cumulative projects were added to existing traffic volumes for project baseline Year 2025 conditions. Typically, an ambient growth rate of at least 1% per year depending on the regional rate of growth should also be added to the existing traffic volumes to determine the Opening Year traffic.

05-1-14

8. Page 39, Opening Year (2025) Intersection and Roadway Operations: Three intersections will require either traffic signal upgrades or a new traffic signal. Will the City be making these improvements required for any potential approval of the project and would they be a developer responsibility?

05-1-15



05-1-10 Refer to **Response to Comments 05-40** and **05-1-4**.

05-1-11 The City's Transportation Study Manual requires that bicycle facility evaluation be included in the Local Mobility Analysis for the project. The purpose of the bicycle facility evaluation contained in the Local Mobility Analysis is to determine if bicycling demand created by the project would cause the need to upgrade existing bicycle facilities on public streets. The project will generate bicycle demand; however, the Local Mobility Analysis found that the demand can be accommodated by existing bicycle facilities on adjacent public roadways. In addition, the project would implement a number of Transportation/Circulation related improvements. Off-site improvements include the installation of a new traffic signal at the intersection of Carmel Ridge Road and Ted Williams Parkway (Signal Warrant Analysis is included in Appendix C). Right-turn overlap signal phasing would be installed by the project at during certain intersection signal phases at the intersections of Carmel Mountain Road/Rancho Carmel Drive (southbound), Carmel Mountain Road/Camino Del Norte (all movements), and Ted Williams Parkway/Pomerado Road (southbound and eastbound, through coordination with the City of Poway).

05-1-12 Refer to **Response to Comment 05-42**.

05-1-13 The City's Transportation Study Manual (City of San Diego 2020) established study requirements for Transportation/Circulation analysis in the City. The Transportation Study Manual does not require

the analysis of freeway segments in the Local Mobility Analysis. With regard to traffic along SR-56, the City's TSM does not require the analysis of freeway segments in the LMA. Refer to **Master Response 3**.

- O5-1-14** Level of Service traffic analysis is no longer required under CEQA, with the implementation of SB 743, which now requires Transportation/Circulation impacts to be analyzed under a vehicle miles traveled scenario using vehicle miles traveled efficiency as the metric. As to the projects analyzed in Chapter 6 of the Draft EIR, the City determined which projects to include in the cumulative projects list for Opening Year 2025 analysis based on project location and stage within the development process. The Local Mobility Analysis (Draft EIR Appendix C) was performed per the City's Transportation Study. Also refer to **Response to Comment O3-5**.
- O5-1-15** The applicant will be required to make the identified improvements at the intersections and install the new traffic signal. This will be required via the conditions of approval for the Master PDP.

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9. Pages 44-45, Table 9, Opening Year (2025) Roadway Level of Service: Windcrest Lane and Carmel Ridge Road are projected to have traffic volumes that are over their roadway design capacity of 2,200 for Year 2025 conditions with the project. Carmel Ridge Road is shown as a collector road in the Local Mobility Analysis which is incorrect according to the *Carmel Mountain Ranch Community Plan*. Both of these local streets are projected to exceed their design capacity and would have significantly more traffic than desirable for a local residential street. The project's driveway access locations and number of residential units served appears to directly contribute to these conditions and are unmitigated. Elimination of the project traffic causing these conditions needs to be considered or other appropriate mitigation measures need to be provided by the project.
10. Page 47, Table 11, Opening Year (2025) Intersection Queuing Analysis: The intersection of Ted Williams Parkway at Shoal Creek Drive eastbound left-turn substantially exceeds the capacity of the existing storage lane of 230-feet. This is a significant impact since the queue length for Year 2025 increases from 292-feet to 631-feet in length, and yet, there is only 230-feet of storage provided at this intersection. This amount of traffic would definitely warrant a dual left turn lane which would require modifications to both Ted Williams Parkway and Shoal Creek Drive. The DEIR indicates that this could be accommodated by lengthening the storage lane, but there is no analysis provided to prove this will work. Re-timing the intersection would affect the other movements at this intersection and cause additional delay to the other approaches.
11. Page 49 Table 12, ADT Forecast by Intersection Leg: Please clarify why the column titled "Existing ADT" does not match the ADT volumes included in Figure 5, Page 23 of the traffic counts in the Appendix of the report. It's not clear why there are different ADT values shown in this table as opposed to both Figure 5 and the traffic counts included in Appendix B. Also, it appears that the Annual Growth Factor may be incorrectly calculated in several cases for Intersections 15 through 27 and others starting with Intersection #1. These calculations need to be re-checked for accuracy.
12. Page 56, Table 13, Horizon Year (2050) Intersection Level of Service: In several cases, it appears that the delay for Existing conditions is greater than the Year 2050 delay at the several intersections, even though traffic volumes have increased substantially at those locations. Some of the examples of this include Intersection #2 during the PM peak hour, Intersection #13 during the AM and PM peak hours, and Intersection #16 during the AM and PM peak hours. Some explanation is needed on why the traffic delay is reduced so substantially in the future, when traffic is projected in 30 years in the future and traffic from the proposed project is added to the future Year 2050 volumes. It is recognized that some changes of traffic movements may change the allocation of green-time to various movements,

O5-1-16

O5-1-17

O5-1-18

O5-1-19

O5-1-16 Refer to **Response to Comment O5-42**.

O5-1-17 Refer to **Response to Comment O5-1-5**.

O5-1-18 The average daily traffic (ADT) shown in Table 12 of the Local Mobility Analysis is specific to intersection approaches and is used to forecast the Horizon Year (2050) intersection volumes. The ADT in Table 12 is estimated based on the peak hour turning movement counts for each intersection approach, taken at the intersection itself. Figure 5 in the Local Mobility Analysis displays ADT based on actual counts for locations that are midway between the intersections. Therefore, the information shown on Figure 5 is different than the data shown in Table 12 because they represent different locations and data sources. The analysis and figures are accurate, and the analysis based on each is performed accurately.

O5-1-19 As background, intersection analysis using Synchro software involves several equations that are used to evaluate intersection level of service and delay. One of the inputs to these equations is a "peak hour factor", which is a factor that is calculated using peak hour intersection turning movement volumes and factors up the hourly volumes to represent the peak 15 minutes. As explained in more detail below, the City's Transportation Study Manual (City of San Diego 2020) recommends using peak hour factor per approach in the existing and opening year analysis as compared to the horizon year 2050 analysis, which uses default PHF of 0.92.

Specifically, the Existing and Opening Year intersection analysis is conducted using the peak hour factor for each individual intersection approach. In Synchro, this means that for existing

and opening year level of service analysis, at a four-legged standard intersection, there would be four unique peak hour factors, one for each leg: north, south, east, and west. For horizon year (2050) it is typical to use a PHF peak hour factor is averaged for the entire intersection to recognize that travel patterns and peak hour traffic volumes will change over a 30-year timeframe. In Synchro, this means that for horizon year level of service analysis, at a four-legged standard intersection, there would be one peak hour factor that averages the factors from each intersection leg. The change in peak hour factor from each approach to an average for the entire intersection can cause a future year intersection delay to be less than an existing delay. This occurs when an intersection approach has a large traffic volume, and the peak hour factor decreases due to using an average peak hour factor for the entire intersection. Thus, all analysis was performed accurately and in accordance with the City's Transportation Study Manual.

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O5-1-19 but with the significant changes in future traffic volumes you would expect the overall delays to increase 30 years in the future.

13. Page 59-60, Table 14. Horizon Year (2050) Roadway Level of Service: Same comments as Comment #9 with respect to Windcrest Lane and Carmel Ridge Road. Carmel Ridge Road and a portion of Windcrest Lane are miss-classified as collector streets. The project causes the future daily traffic volumes on these streets to substantially exceed the design capacity of a "local street" as defined by the Carmel Mountain Ranch Community Plan. Again, no mitigation has been recommended for these streets where there is direct residential frontage with driveway access and the project will contribute a substantial amount of new traffic.

14. Page 61, Horizon Year (2050) Intersection Queuing Analysis: Same comment as Comment #10. The intersection of Ted Williams Parkway at Shoal Creek Drive eastbound left turn volume substantially exceeds the capacity of the existing storage lane. This also occurs for Opening Year conditions. This is a significant impact, since the queue length for Year 2050 increases with the project from 288-feet to 656-feet, and yet, there is only 230-feet of storage provided at this intersection. This intersection would definitely warrant an eastbound dual left-turn lane which would require modifications to both Ted Williams Parkway and Shoal Creek Drive.

15. Page 77, Proposed Bicycle Improvements: This section again indicates "The project is not anticipated to generate enough bicycle demand to warrant additional upgrades to existing or planned facilities". This is an odd conclusion, seeing that the proposed mitigation for the excessive VMT/Capita generated by the project is providing bicycle related mitigation measures and it would appear that the use of bicycles would substantially reduce the VMT generated by the project.

16. Page 87, Tables 24 and 25 (AM/PM) Transit Movement Delay: The analysis indicates that the project would have a significant impact upon the delay of transit vehicles at the intersection of Carmel Mountain Road at Camino Del Norte. However, no public transit improvements or amenities are recommended as part of the project. It would appear warranted given the impacts to the transit movement delays, and the need to reduce the project's VMT/Capita that the project needs to provide a significant amount of transit related improvements for the entire project.

17. Page 91, Internal Circulation: The project has significant impacts to Carmel Ridge Road and Windcrest Lane which have a direct residential frontage and are classified as local streets in the Carmel Mountain Ranch Community Plan. The project's access points located at Intersections #B, #E and #F directly feed into and contribute a significant amount of traffic to both of these local streets. As previously noted in Comments #9 and #13, the project is contributing a substantial additional daily traffic to these local streets which have direct single family residential driveways and

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O5-1-20

O5-1-21

O5-1-22

O5-1-23

O5-1-24



O5-1-20 Refer to **Response to Comment O5-42**.

O5-1-21 Refer to **Response to Comment O5-1-5**.

O5-1-22 The City's Transportation Study Manual requires that bicycle facility evaluation be included in the Local Mobility Analysis for the project. The purpose of the bicycle facility evaluation contained in the Local Mobility Analysis is to determine if bicycling demand created by the project would cause the need to upgrade existing bicycle facilities on public streets. The project will generate bicycle demand; however, the Local Mobility Analysis found that the demand can be accommodated by existing bicycle facilities on adjacent public roadways. Refer to **Response to Comment O5-40**.

O5-1-23 The Local Mobility Analysis identified an increase in travel time during peak hours on Carmel Mountain Road of at most 32 seconds along the entire corridor (1.5 miles long). As identified in the LMA (page 86), this additional delay over approximately 1.5 miles is negligible given the variation in typical daily bus schedules, and no operational improvements are required. Additionally, impacts associated with level of service, roadway capacity or congestion are no longer considered environmental impacts for purposes of CEQA. Therefore, no impact was identified, and no mitigation measures are required.

O5-1-24 Refer to **Response to Comment O5-42**.

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are local in nature traffic. The projected future volumes with the project increase substantially and exceed the design capacity of these local streets at 2,200 ADT.

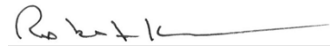
Conclusions

RK recommends that the comments presented in this letter be responded to and addressed as part of the CEQA process. There are a number of findings from this review that would directly affect the proposed project and it should not proceed without addressing and resolving these transportation issues. Significantly more mitigation is necessary to adequately address the VMT issues that have been discussed in this letter. As noted in the DEIR, the project will have a Significant and Unavoidable Impact with respect to VMT that has not been mitigated. More significant transportation mitigation measures and/or reductions in the number of residential units are needed beyond what has been suggested in the DEIR for the project to move forward.

As noted in our comments, there are several traffic impacts that need to be addressed as part of the Local Mobility Analysis. These include several of the technical issues that have been raised in Comments #4 – 17, noted above. A significant concern has been raised as to the project's impacts to Carmel Ridge Road and Windcrest Lane as local streets that will be adversely impacted by the project's traffic. Solutions to these concerns need to be properly addressed for the project to move forward.

RK Engineering Group, Inc. appreciates the opportunity to work with Delano and Delano in reviewing the Trails at Carmel Mountain Ranch project. If you have any questions please call me at (949) 293-9639.

Sincerely,
RK ENGINEERING GROUP, INC.



Robert Kahn, P.E.
Founding Principal

Registered Civil Engineer 20285
Registered Traffic Engineer 0555

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O5-1-26

O5-1-25

Comment noted. As discussed in Section 5.2, Transportation, in the Draft EIR, the City prepared an EIR for the Mobility Choices Program and disclosed that even with implementation of the regulations there would still be significant and unavoidable Transportation/Circulation impacts. Projects that utilize the Mobility Choice Program to provide mitigation for Transportation/Circulation impacts are able to rely upon the Findings and Statement of Overriding Considerations from the City's EIR, which was certified on November 9, 2020 by the City Council. The Mobility Choices Program EIR allows a project that has a significant impact to use compliance with the regulations as mitigation "to the extent feasible" for a significant and unavoidable Transportation/Circulation impact. Moreover, the regulations define Mobility Zone 2 as any premises located either partially or entirely in a Transit Priority Area, thus, vehicle miles traveled reduction guidelines for Mobility Zone 2 were applied to the entire project as a portion of the project site is located within Mobility Zone 2.

Therefore, the project includes vehicle miles traveled reduction measures totaling at least 6 points in accordance with Land Development Manual, Appendix T as mitigation. The vehicle miles traveled reduction measures included in MM-TRA-1 of the Draft EIR include the provision of on-site bicycle repair stations and the provision of short-term bicycle parking stations, available to the public, at least 10 percent beyond the minimum requirements. Refer to **Response to Comments O5-1-1 through O5-1-24**

and **O5-40**. In addition, refer to **Master Response 10** for further information regarding the alternatives selection and analysis provided in the Draft EIR.

O5-1-26 Refer to **Response to Comment O5-1-6**.

Comment Letter O5-2

Response to Comment Letter Enclosure O5-2, SWAPE



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February 5, 2021

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Subject: Comments on the Trails at Carmel Mountain Ranch Project (SCH No. 2020039006)

Dear Mr. DeLano,

We have reviewed the December 2020 Draft Environmental Impact Report ("DEIR") for the Trails at Carmel Mountain Ranch Project ("Project") located in the City of San Diego ("City"). The Project proposes to demolish the existing 18-hole golf course and Country Club and construct a 12,000-SF community art gallery/studio, including 6,000-SF of gallery space, a 2,000-SF open shed structure, a 3,000-SF café, and a 1,200-SF caretaker unit, as well as 1,200 multi-family homes with associated on-site recreational uses and parking, on the 164.5-acre site.

Our review concludes that the DEIR fails to adequately evaluate the Project's hazards and hazardous materials, air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An updated EIR should be prepared to adequately assess and mitigate the potential hazards and hazardous materials, air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

Air Quality

Unsubstantiated Input Parameters Used to Estimate Project Emissions

The DEIR's air quality analysis relies on emissions calculated with CalEEMod.2016.3.2 (p. 5.3-15).¹ CalEEMod provides recommended default values based on site-specific information, such as land use

¹ CalEEMod User Guide, available at: <http://www.caleemod.com/>.

O5-2-1 The comment is an introduction to the comments that follow.

O5-2-2 The model inputs used in the technical study are consistent with the Draft EIR's project description, as shown in Appendix H of the Draft EIR. Project-specific information was included in the modeling in accordance with the requirements of CalEEMod and CEQA in order to provide more project-specific analysis of potential impacts. These project specific inputs were shown in detail in Appendix A to Appendix H of the Draft EIR. Specific comments relating to particular model inputs are addressed in **Response to Comments O5-2-3 through O5-2-8.**

O5-2-1

O5-2-2

type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.² Once all of the values are inputted into the model, the Project's construction and operational emissions are calculated, and "output files" are generated. These output files disclose to the reader what parameters were utilized in calculating the Project's air pollutant emissions and make known which default values were changed as well as provide justification for the values selected.³

When reviewing the Project's CalEEMod output files, provided in the Air Quality Technical Report ("Technical Report") as Appendix H to the DEIR, we found that several model inputs were not consistent with information disclosed in the DEIR. As a result, the Project's construction and operational emissions are underestimated. An updated EIR should be prepared to include an updated air quality analysis that adequately evaluates the impacts that construction and operation of the Project will have on local and regional air quality.

Failure to Model All Proposed Land Uses in Health Risk Assessment Model
According to the DEIR:

"[T]he project proposes a 12,000-square-foot pad for future development of a community art gallery/studio located near the existing Carmel Mountain Ranch library. This gallery may include up to 6,000 square feet in one or two buildings to house gallery space, studio space with an indoor kiln, and a bathroom/kitchen. In addition, this amenity could include an up-to-2,000-square-foot outdoor open shed structure to house a wood-burning ceramic kiln, wood storage, and a washing area. A 3,000-square-foot café/restaurant/banquet area is proposed with 2,000 square feet of dining space and a 1,000-square-foot kitchen. On additional caretaker unit up to 1,200 square feet would also be proposed. This Community Plan Land Use proposed is Community Commercial and the zone would be CC-2-1" (p. ES-3).

As such, the model should have included a total of 12,000-SF for the proposed community art gallery/studio, including the gallery space, open shed structure, restaurant space, and caretaker unit. However, review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch HRA" model fails to include the proposed community art gallery/studio land uses (see excerpt below) (Appendix H, pp. 416).

² CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

³ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 11, 12 – 13. A key feature of the CalEEMod program is the "remarks" feature, where the user explains why a default setting was replaced by a "user defined" value. These remarks are included in the report.

05-2-3

The construction emissions modeling conducted for the air quality and health risk assessment (~~health risk assessment~~), which is included in Appendix H to the Draft EIR, is based on input from an experienced licensed grading and general contractor who reviewed the site plans and phasing plans for the applicant. Based on that review, the contractor determined anticipated construction crew size, construction equipment needs, and worker trip counts. That analysis provides the best available source of information regarding likely construction scheduling and activities for the project (J.T. Kruer & Company 2019).

Contrary to the statement made in the comment, the CalEEMod default table reprinted in the comment letter was not the complete basis of the air quality analysis. Instead, project-specific data was included in the analysis. Since detailed construction activity data was provided for the project, the default table included in the comment letter was overwritten in CalEEMod, which allowed the analysis to account for the entire art gallery/studio. Thus, the construction activity associated with the art studio/gallery was included in the modeling and the air quality analysis accurately includes the art studio/gallery.

Regarding operation, the portions of the art studio/gallery that generate emissions within CalEEMod (gallery space, restaurant, and watchkeeper quarters) were included in the modeling (Appendix A to Appendix H of the Draft EIR). If the CalEEMod modeling had included the entire 12,000 square feet

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area
Other Asphalt Surfaces	12.40	Acre	12.40	540,144.00
Parking Lot	2,085.00	Space	16.75	854,000.00
City Park	62.34	Acre	62.34	3,366,756.40
Apartment Mid Rise	940.00	Dwelling Unit	35.00	940,000.00
Condo/Townhouse High Rise	251.00	Dwelling Unit	16.00	251,000.00

As demonstrated above, the model omits the proposed community art gallery/studio land uses. This omission presents an issue, as the land use size feature is used throughout CalEEMod to determine default variable and emission factors that go into the model's calculations. The square footage of a land use is used for certain calculations such as determining the wall space to be painted (i.e., VOC emissions from architectural coatings) and volume that is heated or cooled (i.e., energy impacts). Furthermore, CalEEMod assigns each land use type with its own set of energy usage emission factors.⁴ Thus, by failing to include the proposed community art gallery/studio, including the gallery space, an open shed structure, restaurant space, and a caretaker unit, the model underestimates the Project's emissions and should not be relied upon to determine Project significance.

Use of an Underestimated Land Use Size

As previously discussed, the Project proposes to include a 12,000-SF community art gallery/studio, including gallery space, an open shed structure, restaurant space, and a caretaker unit. However, review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" model includes only 10,500-SF⁵ for the proposed community art gallery/studio, open shed structure, restaurant space, and caretaker unit (see excerpt below) (Appendix H, pp. 61).

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area
Research & Development	6.00	1000sqft	0.14	6,000.00
Other Asphalt Surfaces	12.40	Acre	12.40	540,144.00
Parking Lot	2,085.00	Space	16.75	854,000.00
City Park	62.34	Acre	62.34	3,366,756.40
Quality Restaurant	3.00	1000sqft	0.07	3,000.00
Apartment Low Rise	1.00	Dwelling Unit	0.39	1,000.00
Apartment Mid Rise	940.00	Dwelling Unit	35.00	940,000.00
Condo/Townhouse High Rise	251.00	Dwelling Unit	16.00	251,000.00

As demonstrated above, the proposed community art gallery/studio, including the open shed structure, restaurant space, and caretaker unit, is underestimated by approximately 1,500-SF.⁶ This underestimation presents an issue, as the land use size feature is used throughout CalEEMod to determine default variable and emission factors that go into the model's calculations. The square footage of a land use is used for certain calculations such as determining the wall space to be painted (i.e., VOC emissions from architectural coatings) and volume that is heated or cooled (i.e., energy

⁴ "CalEEMod User's Guide, Appendix D." CAPCOA, September 2016, available at:

http://www.aqmd.gov/docs/default-source/cal-eemod/updates/2016.3/05_appendix-d2016-3-1.pdf?sfvrsn=2

⁵ Calculated: (6,000-SF of "Research & Development") + (3,000-SF of "Quality Restaurant") + (1,500-SF of "Apartment Low Rise") = 10,500-SF.

⁶ Calculated: (12,000-SF) - (10,500-SF) = 1,500-SF.

O5-2-3
Cont.

of pad, the operational emissions from the art studio/gallery would have been overestimated for area sources, energy use, water/wastewater, and solid waste generation. Instead, project-specific data was added to CalEEMod to only model those land uses within the art/studio gallery that would contribute to emissions from area sources, energy use, water/wastewater, and solid waste. The analysis was therefore accurately estimated. Further, emissions from the art studio/gallery kiln were separately modeled using a spreadsheet-based model, provided in Appendix A to Appendix H of the Draft EIR. As a result, the CalEEMod table cited in the comment letter does not need to be amended. Therefore, the health risk assessment is appropriate and impacts were determined to be less than significant.

impacts). Thus, by underestimating the size of the proposed community art gallery/studio, including gallery space, an open shed structure, restaurant space, and a caretaker unit, the model underestimates the Project's emissions and should not be relied upon to determine Project significance.

Unsubstantiated Amount of Demolition Inputted

According to the DEIR, demolition of the existing land uses would generate 2,428 tons of asphalt and concrete waste, as well as 5,217 tons of non-usable construction and demolition ("C&D") waste (see excerpt below) (p. 5.15-27, Table 5.15-3).

Material Type	Estimated Waste Quantity (tons)	Handling	Estimated Diversion (tons)	Estimated Disposal (tons)
Asphalt and concrete	2,428	Hanson Aggregates 9229 Harris Plant Road San Diego, California 92126 (100% diversion)	2,428	—
Landscape materials	2,963	Miramar Greenery 5180 Convo Street San Diego, California 92111 (100% diversion)	2,963	—
Non-usable C&D materials	5,217	Miramar Landfill 5180 Convo Street San Diego, California 92111 (0% diversion)	—	5,217
Total	10,608		5,391	5,217

As demonstrated above, demolition would generate a total of 7,645 tons of waste.⁷ As such, the Project's CalEEMod model should have included 7,645 tons of demolition.

However, review of the CalEEMod output files demonstrates that the model fails to include the total amount of required demolition. According to the CalEEMod User's Guide, "[h]aul trips are based on the amount of material that is demolished, imported or exported assuming a truck can handle 16 cubic yards of material."⁸ Therefore, the air model calculates a default number of hauling trips based upon the amount of demolition material inputted into the model. When correctly inputting 7,645 tons of demolition, the model calculates a default demolition hauling trip number of 756 trips. However, review of the CalEEMod output files demonstrates that the model calculated a default value of 126 demolition hauling trips, which was artificially increased to 584 trips (see excerpt below) (Appendix H, pp. 74, 89, 198, 211, 311, 324, 429, 444).

Table Name	Column Name	Default Value	New Value
tblTripsAndMT	HaulingTripNumber	126.00	584.00

⁷ Calculated: (2,428 tons of asphalt and concrete) + (5,217 tons of non-usable C&D materials) = 7,645 tons of demolition.

⁸ http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14

↑ O5-2-3
Cont.

O5-2-4

O5-2-4

The air quality modeling unintentionally underestimated the demolition trips provided in Table 5.3-4 of the Draft EIR. Sections 5.3, Air Quality and Odor, and Section 5.5, Energy, together with the Air Quality Technical Report (Appendix H) have been revised in the Final EIR to reflect the correct number of trips. As can be seen in the updated analysis, the daily air quality and annual petroleum use during construction increased as compared to the Draft EIR. However, the revised analysis does not result in any new or substantially more severe environmental impact than was previously disclosed (Final EIR Sections 5.3 and 5.5 and Appendix H). Thus, recirculation is not required.

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length
Grading - Phase 1	16	36.00	4.00	8,532.00	10.80	7.30
Grading - Phase 2	8	18.00	2.00	4,900.00	10.80	7.30
Wet Utilities - Phase 1	12	52.00	24.00	0.00	10.80	7.30
Building Construction	18	452.00	68.00	0.00	10.80	7.30
Wet Utilities - Phase 2	6	26.00	12.00	0.00	10.80	7.30
Building Construction	9	226.00	34.00	0.00	10.80	7.30
Dry Utilities - Phase 1	8	28.00	12.00	0.00	10.80	7.30
Paving - Phase 1	12	32.00	4.00	0.00	10.80	7.30
Dry Utilities - Phase 2	4	14.00	6.00	0.00	10.80	7.30
Paving - Phase 2	6	16.00	2.00	0.00	10.80	7.30
Demolition - Phase 1	6	12.00	4.00	584.00	10.80	7.30
Grading - Phase 3	8	18.00	2.00	236.00	10.80	7.30
Grading - Phase 4	16	36.00	4.00	484.00	10.80	7.30
Wet Utilities - Phase 3	6	26.00	12.00	0.00	10.80	7.30
Dry Utilities - Phase 3	4	14.00	6.00	0.00	10.80	7.30
Wet Utilities - Phase 4	12	52.00	24.00	0.00	10.80	7.30
Paving - Phase 3	6	16.00	2.00	0.00	10.80	7.30
Dry Utilities - Phase 4	8	28.00	12.00	0.00	10.80	7.30
Paving - Phase 4	12	32.00	4.00	0.00	10.80	7.30
Building Construction	9	226.00	34.00	0.00	10.80	7.30
Building Construction	18	452.00	68.00	0.00	10.80	7.30
Architectural Coating	1	46.00	2.00	0.00	10.80	7.30
Architectural Coating	1	46.00	2.00	0.00	10.80	7.30
Architectural Coating	2	92.00	4.00	0.00	10.80	7.30
Architectural Coating	2	92.00	4.00	0.00	10.80	7.30

O5-2-4
Cont.

As you can see in the excerpt above, the default number of demolition hauling trips was underestimated by 630 trips,⁹ while the revised number of demolition hauling trips was underestimated by 172 trips.¹⁰ As such, we know that the model fails to include the total amount of demolition required for the Project. This underestimation presents an issue, as the total amount of demolition material is used by CalEEMod to determine emissions associated with this phase of construction. The three primary operations that

⁹ Calculated: (756 demolition hauling trips) – (126 trips demolition hauling trips) = 630 demolition hauling trips.

¹⁰ Calculated: (756 demolition hauling trips) – (584 trips demolition hauling trips) = 172 demolition hauling trips.

generate dust emission during the demolition phase are mechanical or explosive dismemberment, site removal of debris, and on-site truck traffic on paved and unpaved road.¹¹ By failing to include the total amount of required demolition, the model underestimates emissions associated with fugitive dust, site removal, as well as exhaust from hauling trucks traveling to and from the site, and should not be relied upon to determine the significance of air quality impacts.

Unsubstantiated Reductions to Hauling and Vendor Trip Lengths

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" model includes several reductions to the default hauling trip lengths (see excerpt below) (Appendix H, pp. 74, 198, 311).

Table Name	Column Name	Default Value	New Value
Gr1TripsGr1Mat	HaulingTripLength	20.00	0.25
Gr1TripsGr2Mat	HaulingTripLength	20.00	0.25
Gr1TripsGr3Mat	HaulingTripLength	20.00	0.25
Gr1TripsGr4Mat	HaulingTripLength	20.00	0.25

As you can see in the excerpt above, each of the hauling trip lengths were reduced from their default value of 20- to 0.25-miles.

Similarly, the "Carmel Mountain Ranch HRA" model includes several reductions to the default hauling and vendor trip lengths (see excerpts below) (Appendix H, pp. 428-430).

¹¹ CalEEMod User Guide, Appendix A, p. 11, available at: <http://www.caleemod.com/>

O5-2-4
Cont.

O5-2-5

O5-2-5

This Draft EIR included an explanation for the modification. As explained in Appendix A to Appendix H to the Draft EIR, the revised 0.25-mile trip distance during the grading phases represents the average distance material would be transported on site since cut and fill will be distributed across the site during all of the grading phases of the project (Section 5.3 of the Draft EIR). Similarly, in order to estimate emissions from diesel vehicles on-site for the health risk assessment, the trip lengths for vendor and haul trucks were reduced to 0.19-miles to account for the fact that these vehicles would be moving within the site during all phases (Section 5.3 of the Draft EIR). If a default trip length was assumed, the Draft EIR would have overestimated the emissions from the hauling of material around the project site. Furthermore, the health risk assessment only evaluates on-site emissions, emissions from vendor trucks off-site should not be included.

The reduced trip length for Grading – Phase 2 in the Draft EIR was revised back to the default 20-mile value to reflect the import of material during that phase. The internal movement of soil during that grading phase was previously included in the analysis, but the import from off site was not. Updated air quality modeling results are provided in Section 5.3, Air Quality and Odor, Section 5.5, Energy, and Appendix H of the Final EIR. The revised analysis does not result in any new or substantially more severe environmental impact than was previously disclosed. Thus, recirculation is not required.

[illegible]

O5-2-5
Cont.

O5-2-5
Cont

As you can see in the excerpts above, the hauling trip lengths were reduced from their default value of 20- to 0.25- or 0.19-miles, while all of the vendor trip lengths were reduced from their default value of 7.30- to 0.19-miles. As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.¹² According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Based on applicant provided information" (Appendix H, pp. 63, 187, 300, 418). However, the DEIR and associated documents fail to discuss the "applicant provided information" or justify these reductions whatsoever. As a result, we cannot verify the revised hauling and vendor trip lengths included in the models. By including unsubstantiated reductions to the default hauling and vendor trip lengths, the models may underestimate the Project's construction-related emissions and should not be relied upon to determine the significance of air quality impacts.

¹² CalEEMod User Guide, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9

Unsubstantiated Reductions to Hauling, Vendor, and Worker Trip Numbers

Review of the CalEEMod output files demonstrates that the “Carmel Mountain Ranch” model includes several changes to the default vendor and worker trip numbers (see excerpts below) (Appendix H, pp. 74-76, 198-200, 311-313).

Table Name	Column Name	Default Value	New Value
BtTripsAndVMT	HaulingTripNumber	0.00	8,532.00
BtTripsAndVMT	HaulingTripNumber	126.00	594.00
BtTripsAndVMT	HaulingTripNumber	0.00	238.00
BtTripsAndVMT	HaulingTripNumber	0.00	484.00
BtTripsAndVMT	HaulingTripNumber	0.00	4,880.00
BtTripsAndVMT	VendorTripNumber	0.00	4.00
BtTripsAndVMT	VendorTripNumber	0.00	2.00
BtTripsAndVMT	VendorTripNumber	0.00	4.00
BtTripsAndVMT	VendorTripNumber	0.00	2.00
BtTripsAndVMT	VendorTripNumber	0.00	4.00
BtTripsAndVMT	VendorTripNumber	0.00	2.00
BtTripsAndVMT	VendorTripNumber	0.00	12.00
BtTripsAndVMT	VendorTripNumber	0.00	6.00
BtTripsAndVMT	VendorTripNumber	0.00	24.00
BtTripsAndVMT	VendorTripNumber	0.00	2.00
BtTripsAndVMT	VendorTripNumber	0.00	12.00
BtTripsAndVMT	VendorTripNumber	0.00	4.00
BtTripsAndVMT	VendorTripNumber	0.00	2.00

O5-2-6

O5-2-6

Regarding the assumptions utilized in the CalEEMod modeling, refer to **Response to Comment O5-2-2**.

The CalEEMod 2016.3.2 health risk assessment analysis relied upon CARB's EMFAC2014 for the fleet mix and emission factors for mobile sources for both construction and operation. CARB's EMFAC2014 assumed that 96% of PM₁₀ exhaust emissions from passenger cars (LDA), light-duty trucks (GVWR <6000 pounds and ETW ≤ 3750 pounds)(LDT1), and light-duty trucks (GVWR <6000 pounds and ETW 3751-5750 pounds) (LDT2) were attributed to gasoline power and the remaining 4% were from diesel fueled LDA (2015b California Air Resources Board). Therefore, it is not accurate to include worker vehicles in the construction analysis as the majority of the exhaust PM₁₀ comes from gasoline, not diesel, and gasoline is not a toxic air contaminant.

Table Name	Column Name	Default Value	New Value
btTripsAndvMT	VendorTripNumber	943.00	34.00
btTripsAndvMT	VendorTripNumber	943.00	68.00
btTripsAndvMT	VendorTripNumber	0.00	2.00
btTripsAndvMT	VendorTripNumber	0.00	2.00
btTripsAndvMT	VendorTripNumber	0.00	4.00
btTripsAndvMT	VendorTripNumber	0.00	4.00
btTripsAndvMT	VendorTripNumber	0.00	24.00
btTripsAndvMT	VendorTripNumber	943.00	68.00
btTripsAndvMT	VendorTripNumber	0.00	12.00
btTripsAndvMT	VendorTripNumber	943.00	34.00
btTripsAndvMT	VendorTripNumber	0.00	12.00
btTripsAndvMT	VendorTripNumber	0.00	4.00
btTripsAndvMT	VendorTripNumber	0.00	6.00
btTripsAndvMT	WorkerTripNumber	40.00	36.00
btTripsAndvMT	WorkerTripNumber	15.00	18.00
btTripsAndvMT	WorkerTripNumber	20.00	12.00
btTripsAndvMT	WorkerTripNumber	20.00	18.00
btTripsAndvMT	WorkerTripNumber	40.00	36.00
btTripsAndvMT	WorkerTripNumber	15.00	28.00
btTripsAndvMT	WorkerTripNumber	10.00	14.00
btTripsAndvMT	WorkerTripNumber	30.00	52.00
btTripsAndvMT	WorkerTripNumber	15.00	16.00
btTripsAndvMT	WorkerTripNumber	20.00	28.00
btTripsAndvMT	WorkerTripNumber	30.00	52.00
btTripsAndvMT	WorkerTripNumber	20.00	18.00
btTripsAndvMT	WorkerTripNumber	2,951.00	228.00
btTripsAndvMT	WorkerTripNumber	2,951.00	452.00
btTripsAndvMT	WorkerTripNumber	590.00	46.00
btTripsAndvMT	WorkerTripNumber	590.00	46.00
btTripsAndvMT	WorkerTripNumber	590.00	62.00
btTripsAndvMT	WorkerTripNumber	590.00	92.00
btTripsAndvMT	WorkerTripNumber	30.00	52.00
btTripsAndvMT	WorkerTripNumber	2,951.00	452.00
btTripsAndvMT	WorkerTripNumber	15.00	28.00
btTripsAndvMT	WorkerTripNumber	2,951.00	228.00
btTripsAndvMT	WorkerTripNumber	20.00	28.00
btTripsAndvMT	WorkerTripNumber	30.00	52.00
btTripsAndvMT	WorkerTripNumber	10.00	14.00

O5-2-6
Cont.

As you can see in the excerpts above, the number of hauling, vendor, and worker trips was collectively reduced by approximately 1,266 trips.

Similarly, the "Carmel Mountain Ranch HRA" model includes several changes to the default hauling, vendor, and worker trip numbers (see excerpt below) (Appendix H, pp. 429-432).

Table Name	Column Name	Default Value	New Value
bitripsAndvMT	HaulingTripNumber	0.00	8,532.00
bitripsAndvMT	HaulingTripNumber	126.00	564.00
bitripsAndvMT	HaulingTripNumber	0.00	236.00
bitripsAndvMT	HaulingTripNumber	0.00	464.00
bitripsAndvMT	HaulingTripNumber	0.00	4,900.00
bitripsAndvMT	VendorTripNumber	0.00	2.00
bitripsAndvMT	VendorTripNumber	0.00	4.00
bitripsAndvMT	VendorTripNumber	0.00	2.00
bitripsAndvMT	VendorTripNumber	0.00	4.00
bitripsAndvMT	VendorTripNumber	0.00	12.00
bitripsAndvMT	VendorTripNumber	0.00	6.00
bitripsAndvMT	VendorTripNumber	0.00	24.00
bitripsAndvMT	VendorTripNumber	0.00	2.00
bitripsAndvMT	VendorTripNumber	0.00	12.00
bitripsAndvMT	VendorTripNumber	0.00	4.00
bitripsAndvMT	VendorTripNumber	0.00	2.00
bitripsAndvMT	VendorTripNumber	941.00	34.00
bitripsAndvMT	VendorTripNumber	941.00	66.00
bitripsAndvMT	VendorTripNumber	0.00	2.00
bitripsAndvMT	VendorTripNumber	0.00	2.00
bitripsAndvMT	VendorTripNumber	0.00	4.00
bitripsAndvMT	VendorTripNumber	0.00	4.00
bitripsAndvMT	VendorTripNumber	0.00	24.00
bitripsAndvMT	VendorTripNumber	941.00	66.00
bitripsAndvMT	VendorTripNumber	0.00	12.00
bitripsAndvMT	VendorTripNumber	941.00	34.00
bitripsAndvMT	VendorTripNumber	0.00	12.00
bitripsAndvMT	VendorTripNumber	0.00	4.00
bitripsAndvMT	VendorTripNumber	0.00	6.00
bitripsAndvMT	WorkerTripNumber	40.00	0.00
bitripsAndvMT	WorkerTripNumber	15.00	0.00
bitripsAndvMT	WorkerTripNumber	20.00	0.00
bitripsAndvMT	WorkerTripNumber	20.00	0.00
bitripsAndvMT	WorkerTripNumber	40.00	0.00
bitripsAndvMT	WorkerTripNumber	15.00	0.00
bitripsAndvMT	WorkerTripNumber	10.00	0.00
bitripsAndvMT	WorkerTripNumber	30.00	0.00
bitripsAndvMT	WorkerTripNumber	15.00	0.00
bitripsAndvMT	WorkerTripNumber	20.00	0.00
bitripsAndvMT	WorkerTripNumber	30.00	0.00
bitripsAndvMT	WorkerTripNumber	20.00	0.00

O5-2-6
Cont.

Table Name	Column Name	Default Value	New Value
tblTripsAndVMT	WorkerTripNumber	2,948.00	0.00
tblTripsAndVMT	WorkerTripNumber	2,948.00	0.00
tblTripsAndVMT	WorkerTripNumber	590.00	0.00
tblTripsAndVMT	WorkerTripNumber	590.00	0.00
tblTripsAndVMT	WorkerTripNumber	590.00	0.00
tblTripsAndVMT	WorkerTripNumber	590.00	0.00
tblTripsAndVMT	WorkerTripNumber	590.00	0.00
tblTripsAndVMT	WorkerTripNumber	30.00	0.00
tblTripsAndVMT	WorkerTripNumber	2,948.00	0.00
tblTripsAndVMT	WorkerTripNumber	15.00	0.00
tblTripsAndVMT	WorkerTripNumber	2,948.00	0.00
tblTripsAndVMT	WorkerTripNumber	28.00	0.00
tblTripsAndVMT	WorkerTripNumber	30.00	0.00
tblTripsAndVMT	WorkerTripNumber	10.00	0.00

As you can see in the excerpt above, the number of hauling and vendor trips were revised to reflect the same values inputted into the "Carmel Mountain Ranch" model, while the worker trip numbers were each reduced to 0. As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.¹³ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Based on applicant provided information" (Appendix H, pp. 63, 187, 300, 418). Furthermore, the DEIR provides Table 5.3-4, "Construction Scenario Assumptions," which includes average daily worker and vendor, and as well as total hauling, trip numbers, stating:

"The *construction equipment mix* used for estimating the construction emissions of the proposed project is based on information provided by the project applicant and is shown in Table 5.3-4" (emphasis added) (p. 5.3-17-5.3-20).

However, these justifications are insufficient for three reasons.

First, as demonstrated in the excerpt above, while the DEIR states that the *construction equipment mix* included in the "Construction Scenario Assumptions" table was provided by the project applicant and used to estimate construction emissions, the DEIR fails to indicate that the *trip numbers* were provided by the project applicant and should be included in the modeling.

Second, the revised worker trip values inputted into the "Carmel Mountain Ranch HRA" model are inconsistent with the values provided in the "Construction Scenario Assumptions" table. As such, it is unclear why these values were reduced to 0 in the model.

Third, while there is a note provided under the "Construction Scenario Assumptions" table, stating "[s]ee Appendix H for details," there is no source provided for these assumptions (p. 5.3-20). Furthermore, the same table is provided in Appendix H, including a note stating: "[s]ee Appendix A for details" (Appendix H, p. 28). However, Appendix A to the Technical Report contains the CalEEMod

¹³ CalEEMod User Guide, available at: http://www.agmd.gov/docs/default-source/calceemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9

O5-2-6
Cont.

output files. As such, other than the fact that these assumptions match the non-default values inputted into the CalEEMod models, it is unclear how these assumptions were derived. Moreover, it is incorrect to use the CalEEMod model itself to substantiate non-default data, as the Project documents should substantiate the changes included in the CalEEMod model, not vice versa. According to the CalEEMod User's Guide:

"CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA" (emphasis added).¹⁴

As you can see in the excerpt, any changes to default values should be supported by substantial evidence. As the Project fails to provide substantial evidence to support the revised hauling, vendor, and worker trip numbers, we cannot verify the changes. By including unsubstantiated changes to the default hauling, vendor, and worker trip numbers, the models may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Unsubstantiated Reduction to the Default CO₂ Intensity Factor

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models include a reduction to the default CO₂ intensity factor (see excerpt below) (Appendix H, pp. 74, 198, 311, 428).

Table Name	Column Name	Default Value	New Value
tblProjectCharacteristics	CO2IntensityFactor	720.49	448.3

As you can see in the excerpt above, the CO₂ intensity factor was reduced by approximately 38%, from the default value of 720.49 pounds per megawatt hour ("lbs/MWh") to 448.3 lbs/MWh. As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.¹⁵ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Based on 2017 RPS for SDG&E" (Appendix H, pp. 61, 185, 298, 416).

However, this justification is insufficient for two reasons. First, the DEIR and associated documents fail to provide a source for the revised CO₂ intensity factor. Second, just because the state has Renewable Portfolio Standard ("RPS") goals does not mean that these reductions will be achieved locally at the Project site or by the Project's utility company. As a result, we cannot verify the revised CO₂ intensity factor. This unsubstantiated reduction presents an issue, as CalEEMod uses the CO₂ intensity factor to calculate the Project's greenhouse gas ("GHG") emissions associated with electricity use.¹⁶ Thus, by including an unsubstantiated reduction to the default CO₂ intensity factor, the models may

¹⁴ CalEEMod Model 2013.2.2 User's Guide, available at: <http://www.aqmd.gov/docs/default-source/calceemod/usersguideSept2016.pdf?sfvrsn=6>, p. 12.

¹⁵ CalEEMod User Guide, available at: http://www.aqmd.gov/docs/default-source/calceemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9.

¹⁶ "CalEEMod User's Guide," CAPCOA, November 2017, available at: <http://www.caleemod.com/>, p. 17.

O5-2-6
Cont.

O5-2-7

O5-2-7

As shown in Appendix H of the Draft EIR, the greenhouse gas intensity factor was adjusted to reflect the actual reported renewables content for San Diego Gas & Electric (SDG&E) for 2017. The default emission factor in CalEEMod is from 2009, which does not reflect the power mix currently in use. The Draft EIR's stated justification for the reduction is appropriate as state law mandates renewable energy procurement in specified amounts. To presume that SDG&E may at some unspecified time in the future fail to satisfy its renewable portfolio obligations would be speculative.

Moreover, emissions intensity is not based on state goals, as implied by the comment, but by actual data confirmed by SDG&E. Based on the 2017 reported information, the Draft EIR assumed that SDG&E would meet the SB x1 2 renewable portfolio standard (RPS) of 33% of total electricity sold to retail customers in California by December 31, 2020, and make progress towards the SB 350 RPS of 50% of the total electricity sold to retail customers in California per year by December 31, 2030 (i.e., 34.7% renewables). However, the 2018 Power Content Label for SDG&E demonstrates that, SDG&E's power mix already includes 43% renewables, exceeding what was assumed in the Draft EIR.¹ Therefore, the reduced intensity values for power provided to the project and the associated greenhouse gas emissions are conservatively estimated and the analysis is adequate as presented.

¹ https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_San_Diego_Gas_and_Electric.pdf

"Consistent with CalEEMod defaults," it is assumed that the surface area for painting equals 2.7 times the floor square footage, with 75% assumed for interior coating and 25% assumed for exterior surface coating (CAPCOA 2017)¹⁹ (emphasis added) (p. 31).

As you can see in the excerpt above, the Technical Report indicates that the architectural coating areas relied upon by the models are consistent with CalEEMod defaults. However, as demonstrated above, the models include non-default architectural coating area values. As a result, the models are inconsistent with the information provided in the Technical Report, and we cannot verify the revised values. By including unsubstantiated reductions to the default architectural coating areas, the models may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Failure to Model Material Import

According to the DEIR, the Project would require 38,156 cubic yards ("cy") of material import (p. 5.3-20). However, review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models fail to include any amount of material import. As a result, the amount of material import required for Project construction is underestimated by 38,156 cy. This underestimation presents an issue, as CalEEMod uses material import to calculate emissions produced from material movement, including truck loading, unloading, and additional hauling truck trips.¹⁹ Thus, by failing to include the material import required for Project construction, the models underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Unsubstantiated Reductions to Acres of Grading Values

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models include several reductions to the default acres of grading values (see excerpt below) (Appendix H, pp. 67, 191, 304, 422).

Table Name	Column Name	Default Value	New Value
tblGrading	AcresOfGrading	135.00	0.00
tblGrading	AcresOfGrading	103.50	0.00
tblGrading	AcresOfGrading	279.00	0.00
tblGrading	AcresOfGrading	112.50	0.00

As you can see in the excerpt above, the models assume that the Project's acres of grading values would each be 0 acres. As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.²⁰ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Based on applicant provided information" (Appendix H, pp. 63, 187, 300, 418). However, the DEIR and associated documents fail to address or justify these

¹⁹ CalEEMod User's Guide, available at: http://www.aqmd.gov/docs/default-source/cal-eemod/upgrades/2016.3/01_user-39-s-guide2016-3-1.pdf?sfvrsn=2, p. 3, 26.

²⁰ CalEEMod User Guide, available at: http://www.aqmd.gov/docs/default-source/cal-eemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2, 9

O5-2-8
Cont.

O5-2-9

O5-2-10

O5-2-9 Refer to **Response to Comment O5-2-4**.

O5-2-10 The CalEEMod modeling has been revised in Section 5.3, Air Quality and Odor, and Section 5.5, Energy, of the Final EIR to reflect the default CalEEMod grading acres based on the pieces of equipment during the grading phases and included in the Final EIR. This was revised from the Draft EIR's assumption of 0 acres of grading during the grading phases to 135 acres during Grading – Phase 1, 112.5 acres during Grading – Phase 2, 103.5 acres during Grading–Phase 3, and 279 acres during Grading–Phase 4. The revised acreages are CalEEMod default assumptions based on the amount of equipment during each grading phase and number of days of each grading phase. The modeling of the revised grading acres has been revised in the Final EIR. The revised modeling increased the emissions of particulate matter during construction as reflected in Tables 5.3-6 and 5.3-8 but does not exceed the City's PM₁₀ or PM_{2.5} significance thresholds of 100 pounds per day and 55 pounds per day, respectively. However, the revised analysis does not result in any new or substantially more severe environmental impact than disclosed in the Draft EIR. Thus, recirculation is not required.

reductions whatsoever. As such, we cannot verify the revised acres of grading values. This presents an issue, as CalEEMod uses the acres of grading values to estimate the dust emissions associated with grading.²¹ Thus, by including unsubstantiated reductions to the acres of grading values, the models may underestimate the Project's construction-related emissions and should not be relied upon to determine the significance of air quality impacts.

Use of Underestimated Operational Vehicle Trip Rates

According to the DEIR, the Project is anticipated to generate 8,282 daily vehicle trips throughout operation (p. 5.2-9). Thus, the Project's CalEEMod models should have included operational vehicle trip rates that reflect the daily trip generation estimated by the DEIR. However, review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" model includes only 7,928.00, 7,618.03, and 6,986.18 weekday, Saturday, and Sunday vehicle trips, respectively (see excerpt below) (Appendix H, pp. 167, 289, 402).

Land Use	Average Daily Trip Rate		
	Weekday	Saturday	Sunday
Apartment Low Rise	0.00	0.00	0.00
Apartment Mid Rise	7,928.00	7,618.03	6,986.18
City Park	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00
Quality Restaurant	0.00	0.00	0.00
Research & Development	0.00	0.00	0.00
Total	7,928.00	7,618.03	6,986.18

As you can see in the excerpt above, the number of weekday, Saturday, and Sunday vehicle trips are underestimated by approximately 354, 664, and 1,296 trips, respectively.

Similarly, the "Carmel Mountain Ranch HRA" model includes only 7,924.15, 7,620.47, and 6,984.64 weekday, Saturday, and Sunday vehicle trips, respectively (see excerpt below) (Appendix H, pp. 522).

²¹ "Appendix A Calculation Details for CalEEMod," available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 9.

O5-2-10
Cont.

O5-2-11

O5-2-11 Refer to **Response to Comment O5-2-5**.

The revisions to vehicle trips do not impact the health risk assessment findings, as the health risk assessment evaluated emissions during construction only. As discussed in Section 5.3.4 of the Draft EIR, the project would not emit toxic air contaminant emissions in substantial quantities during operation. The majority of vehicle trips to the project during operation would be from residents and visitors, driving predominantly light-duty gasoline vehicles as discussed in detail in **Response to Comment O5-2-6**. Therefore, an operational health risk assessment is not warranted. Operational health risk assessments are generally conducted for major sources of toxic air contaminant emissions. For stationary sources, health risk assessments are required for industrial facilities (e.g., refineries, distribution centers, and rail yards) that emit substantial amounts of air pollutants. Such facilities with the potential for harmful toxic air contaminants are specifically listed in the California Air Resources Board's (CARB) Air Quality and Land Use Handbook. CARB does not list ~~mixed-use or retail~~ residential developments, like the project, because they are not major toxic air contaminant emission sources. Therefore, as a matter of guidance and standard practice, residential developments such as the project are not required to prepare health risk assessments to satisfy CEQA mandates.

Land Use	Average Daily Trip Rate		
	Weekday	Saturday	Sunday
Apartments Mid Rise	7,924.15	7,620.47	6984.64
City Park	0.00	0.00	0.00
Condo/Townhouse High Rise	0.00	0.00	0.00
Other Asphalt Surfaces	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00
Total	7,924.15	7,620.47	6,984.64

As you can see in the excerpt above, the number of weekday, Saturday, and Sunday trips are underestimated by approximately 358, 662, and 1,297 trips, respectively. Thus, the trip rates inputted into the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models are underestimated and inconsistent with the information provided by the DEIR. By including underestimated operational vehicle trip rates, the models underestimate the Project's mobile-source operational emissions and should not be relied upon to determine Project significance.

Unsubstantiated Changes to Fireplace and Woodstove Values

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models include several changes to the default fireplace and woodstove values (see excerpt below) (Appendix H, pp. 67, 77, 191, 201, 304, 314, 190-191, 422, 432-433).

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodstove	3,078.40	0.00
tblFireplaces	FireplaceWoodstove	3,078.40	0.00
tblFireplaces	FireplaceWoodstove	3,078.40	0.00
tblFireplaces	FireplaceWoodstove	3,078.40	0.00
tblFireplaces	NumberGas	0.55	1.00
tblFireplaces	NumberGas	521.95	949.00
tblFireplaces	NumberGas	138.05	251.00
tblFireplaces	NumberNoFireplace	0.10	0.00
tblFireplaces	NumberNoFireplace	94.90	0.00
tblFireplaces	NumberNoFireplace	25.10	0.00
tblFireplaces	NumberWood	0.36	0.00
tblFireplaces	NumberWood	332.15	0.00
tblFireplaces	NumberWood	97.65	0.00
tblWoodstoves	NumberCatalytic	0.05	0.00
tblWoodstoves	NumberCatalytic	47.45	0.00
tblWoodstoves	NumberCatalytic	12.55	0.00
tblWoodstoves	NumberNoncatalytic	0.05	0.00
tblWoodstoves	NumberNoncatalytic	47.45	0.00
tblWoodstoves	NumberNoncatalytic	12.55	0.00
tblWoodstoves	WoodstoveWoodstove	3,019.20	0.00
tblWoodstoves	WoodstoveWoodstove	3,019.20	0.00
tblWoodstoves	WoodstoveWoodstove	3,019.20	0.00

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The project would only include all natural-gas fireplaces, and no wood stoves or fireplaces are proposed or will be constructed, as indicated in Appendix A to Appendix H of the Draft EIR and will be reflected in the permit conditions. As such, the CalEEMod inputs were modified to reflect the project being proposed. In Appendix A to Appendix H of the Draft EIR, the wood stoves and wood fireplaces were removed from the modeling and natural gas fireplaces were increased to account for all residential units of the project.

O5-2-11
Cont.

O5-2-12

As you can see in the excerpt above, the model assumes the Project will have 1,201 gas fireplaces and no wood-burning fireplaces or woodstoves. As previously mentioned, the CalEEMod User's Guide requires any changes to model defaults be justified.²² According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "Natural gas only, no wood burning stoves or fireplaces" (Appendix H, pp. 63, 187, 300, 418). However, the DEIR and associated documents fail to address or justify these changes. This is incorrect, as according to the CalEEMod User's Guide:

"CalEEMod was also designed to allow the user to change the defaults to reflect site- or project-specific information, when available, provided that the information is supported by substantial evidence as required by CEQA" (emphasis added).²³

As you can see in the excerpt, any changes to default values should be supported by substantial evidence. As the DEIR fails to address these changes whatsoever, there is no substantial evidence supporting the revised fireplace and woodstove values. As a result, the changes are unsubstantiated. This presents an issue, as CalEEMod uses the number of woodstoves and fireplaces to calculate the Project's area-source operational emissions.²⁴ Thus, by including unsubstantiated changes to the default fireplace and woodstove values, the models may underestimate the Project's area-source operational emissions and should not be relied upon to determine the significance of the Project's operational air quality impacts.

Incorrect Application of Tier 4 Final Mitigation

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models assume that the Project's off-road construction equipment fleet would meet Tier 4 Final emissions standards (see excerpt below) (Appendix H, pp. 66-67, 190-191, 303-304, 420-421).

²² CalEEMod User Guide, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 2.9

²³ CalEEMod Model 2013.2.2 User's Guide, available at: <http://www.aqmd.gov/docs/default-source/caleemod/usersguideSept2016.pdf?sfvrsn=6>, p. 12.

²⁴ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 40.

O5-2-12
Cont.

O5-2-13

O5-2-13 The modeling in Appendix A to Appendix H of the Draft EIR assumed the use of Tier 4 Final construction equipment as a permit condition. The Draft EIR however referred to the equipment as Tier 4 Interim in Section 5.3.4. The Final EIR, Section 5.3 Air Quality and Appendix H text has been revised to reflect the use of Tier 4 Final equipment in the project's construction.

[illegible]

As previously mentioned, the CalEEMod User's Guide requires any change to model defaults be justified.²⁵ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "In accordance with SDAPCD Rule 55 and PDF for Tier 4 Interim equipment" (Appendix H, pp. 64, 188, 301, 418). Furthermore, the DEIR states:

"The applicant has committed to a construction equipment fleet that meets an average EPA Tier 4 Interim emission standard or better" (see excerpt below) (p. 5.3-20).

²⁵ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9.

First, as demonstrated above, the DEIR indicates that the Project would implement Tier 4 *Interim* mitigation, rather than the more stringent Tier 4 *Final* mitigation. The United States Environmental Protection Agency ("U.S. EPA") has slowly adopted more stringent standards to lower the emissions from off-road construction equipment since 1994. Since that time, Tier 1, Tier 2, Tier 3, Tier 4 *Interim*, and Tier 4 *Final* construction equipment has been phased in over time. Tier 4 *Final* represents the cleanest burning equipment and therefore has the lowest emissions compared to other tiers, including Tier 4 *Interim* equipment (see excerpt below).²⁶



Second, while the DEIR states that “[t]he applicant has committed to a construction equipment fleet that meets an average EPA Tier 4 interim emission standard or better,” this requirement is not included formally as a mitigation measure. This is incorrect, as according to the Association of Environmental Professionals (“AEP”) *CEQA Portal Topic Paper* on mitigation measures:

26 "San Francisco Clean Construction Ordinance Implementation Guide for San Francisco Public Projects." August 2015, available at: https://www.sfdph.org/dph/files/EHSdocs/AirQuality/San_Francisco_Clean_Construction_Ordinance_2015.pdf.
6

"By definition, *mitigation measures are not part of the original project design*. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the original project design" (emphasis added).²⁷

Furthermore, AEP guidance states:

"While not "mitigation", a good practice is *to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP)*. Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, *it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact*" (emphasis added).²⁸

As you can see in the excerpts above, *project design features are not mitigation measures and may be eliminated from the Project's design*. Thus, as the DEIR fails to include the implementation of Tier 4 Interim emissions standards for construction equipment as a mitigation measure, we cannot guarantee that it would be implemented, monitored, and enforced on the Project site. Until the DEIR requires the use of construction equipment that meets Tier 4 Interim emissions standards through mitigation, the DEIR's CalEEMod models underestimate the Project's construction-related emissions and should not be relied upon.

Incorrect Application of Construction-Related Mitigation Measures

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models include the following construction-related mitigation measures (see excerpt below) (Appendix H, pp. 90, 212, 325, 445).

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment
Water Exposed Area
Reduce Vehicle Speed on Unpaved Roads

Furthermore, the model includes a 0.5% moisture content and a vehicle speed of 15 miles per hour ("MPH") (see excerpt below) (Appendix H, pp. 66, 190, 303, 420).

²⁷ "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, available at: <https://ceqaportal.org/wp/CEQA%20Mitigation%202020.pdf>, p. 5.

²⁸ "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, available at: <https://ceqaportal.org/wp/CEQA%20Mitigation%202020.pdf>, p. 6.

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The CalEEMod "mitigation" module allows the user to apply project design features as well as regulatory measures to reduce the baseline emissions of the project. The CalEEMod "mitigation" module is not solely for the application of project mitigation. Furthermore, the use of the "mitigation" module in the Draft EIR only reflects the application of regulatory measures and project design features as described in Appendix H to the Draft EIR. No change to the modeling is required.

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Cont.

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Table Name	Column Name	Default Value	New Value
tblConsDustMitigation	WaterUnpavedRoadMobileControl	0	0.5
tblConsDustMitigation	WaterUnpavedRoadVehicleSpeed	0	15

As previously mentioned, the CalEEMod User's Guide requires any change to model defaults be justified.²⁹ According to the "User Entered Comments & Non-Default Data" table, the justification provided for these changes is: "In accordance with SDAPCD Rule 55 and PDF for Tier 4 Interim equipment" (Appendix H, pp. 64, 188, 301, 418). Furthermore, regarding the Project's construction-related emissions, the DEIR states:

"Although not considered mitigation, these emissions reflect the CalEEMod "mitigated" output, which accounts for the required compliance with SDAPCD Rule 55 (Fugitive Dust)" (p. 5.3-29).

However, these justifications are insufficient for three reasons. First, review of SDAPCD Rule 55 demonstrates that none of the mitigation measures included in the model are specifically required.³⁰ Second, regarding the Project's criteria air pollutant emissions, the DEIR states:

"No mitigation would be required" (p. 5.3-31).

As the excerpt above demonstrates, the DEIR claims no mitigation measures would be required. As such, construction-related mitigation measures should not be included in the model. Third, as previously stated, according to the AEP *CEQA Portal Topic Paper* on mitigation measures:

"By definition, mitigation measures are not part of the original project design. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the original project design. Mitigation measures are identified by the lead agency after the project has undergone environmental review and are above-and-beyond existing laws, regulations, and requirements that would reduce environmental impacts" (emphasis added).³¹

As you can see in the excerpt above, mitigation measures "are not part of the original project design" and are intended to go "above-and-beyond" existing regulatory requirements. As such, the inclusion of these measures, based on the Project's compliance with SDAPCD Rule 55, is unsubstantiated. By including several construction-related mitigation measures without properly committing to their implementation, the models may underestimate the Project's construction-related emissions and should not be relied upon to determine Project significance.

Incorrect Application of Mobile-Related Operational Mitigation Measures

Review of the CalEEMod output files demonstrates that the "Carmel Mountain Ranch" and "Carmel Mountain Ranch HRA" models include the following mobile-, energy-, area-, water-, and waste-related

²⁹ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

³⁰ "RULE 55 FUGITIVE DUST CONTROL," SDAPCD, June 2009, available at: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Prohibitions/APCD_R55.pdf.

³¹ "CEQA Portal Topic Paper Mitigation Measures," AEP, February 2020, available at: <https://ceqaportal.org/to/CEQA%20Mitigation%202020.pdf>, p. 5.

O5-2-15 Refer to **Response to Comment 05-2-14**.

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Cont.

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operational mitigation measures (see excerpts below) (Appendix H, pp. 166, 168, 173-174, 176, 179, 288, 290, 293-294, 296, 297, 401, 403, 406-407, 509, 410, 521, 523, 528, 530, 532):

Mobile-Related Operational Mitigation Measures

4.1 Mitigation Measures Mobile

- Increase Density
- Increase Diversity
- Improve Destination Accessibility
- Increase Transit Accessibility
- Improve Pedestrian Network
- Provide Traffic Calming Measures

Energy-Related Operational Mitigation Measures

5.1 Mitigation Measures Energy

- Exceed Title 24
- Kilowatt Hours of Renewable Electricity Generated

Area-Related Operational Mitigation Measures

6.1 Mitigation Measures Area

- Use Low VOC Paint - Residential Interior
- Use Low VOC Paint - Residential Exterior
- Use Low VOC Paint - Non-Residential Interior
- Use Low VOC Paint - Non-Residential Exterior
- Use only Natural Gas Hearths

Water-Related Operational Mitigation Measures

7.1 Mitigation Measures Water

- Install Low Flow Bathroom Faucet
- Install Low Flow Kitchen Faucet
- Install Low Flow Toilet
- Install Low Flow Shower
- Use Water Efficient Irrigation System

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Cont.

Waste-Related Operational Mitigation Measure

8.1 Mitigation Measures Waste

Institute Recycling and Composting Services

As previously mentioned, the CalEEMod User's Guide requires any change to model defaults be justified.³² According to the "User Entered Comments & Non-Default Data" table, the justifications provided for inclusion of the above-mentioned energy-, area-, water-, and waste-related operational mitigation measures are: "Based on 2019 Title 24 solar requirements," "water efficient fixtures and irrigation," and "In accordance with AB 341," respectively (Appendix H, pp. 64, 188, 301, 419). However, these justifications are insufficient for four reasons.

First, the "User Entered Comments & Non-Default Data" fails to provide a justification for the inclusion of the mobile-related operational mitigation measures. As a result, the inclusion of these measures in the models is unsubstantiated.

Second, as previously stated, according to the AEP CEQA Portal Topic Paper on mitigation measures:

"By definition, mitigation measures are not part of the original project design. Rather, mitigation measures are actions taken by the lead agency to reduce impacts to the environment resulting from the original project design. Mitigation measures are identified by the lead agency after the project has undergone environmental review and are above-and-beyond existing laws, regulations, and requirements that would reduce environmental impacts" (emphasis added).³³

As you can see in the excerpt above, mitigation measures "are not part of the original project design" and are intended to go "above-and-beyond" existing regulatory requirements. As such, the inclusion of the above-mentioned energy- and waste-related operational mitigation measures, based on the Project's compliance with Title 24 requirements and AB 341, is unsubstantiated.

Third, while the DEIR states that the Project would "include a myriad of sustainable design features," these design features do not justify the inclusion of the above-mentioned operational mitigation measures (p. 3-8). According to the AEP CEQA Portal Topic Paper on mitigation measures:

"While not "mitigation", a good practice is to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project

³² CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 2, 9

³³ "CEQA Portal Topic Paper Mitigation Measures," AEP, February 2020, available at: <https://ceqaportal.org/wp/CEQA%20Mitigation%202020.pdf>, p. 5.

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Cont.

that could eliminate one or more of the design features without understanding the resulting environmental impact” (emphasis added).³⁴

As you can see in the excerpts above, *project design features are not mitigation measures and may be eliminated from the Project’s design*. Thus, as the above-mentioned operational mitigation measures are not formally included as mitigation measures, we cannot guarantee that they would be implemented, monitored, and enforced on the Project site.

Fourth, regarding the Project’s criteria air pollutant emissions, the DEIR states:

“No mitigation would be required” (p. 5.3-31).

As you can see in the excerpt above, the DEIR claims that no mitigation measures would be required. As such, none of the above-mentioned operational mitigation measures should have been included in the models. By incorrectly including several mobile-, energy-, area-, water-, and waste-related operational mitigation measures, the models underestimate the Project’s operational emissions and should not be relied upon to determine Project significance.

Updated Analysis Indicates a Potentially Significant Air Quality Impact

In an effort to estimate the Project’s construction-related and operational emissions, we prepared an updated CalEEMod model, using the Project-specific information provided by the DEIR. In our updated model, we corrected the community art gallery/studio land use size and operational vehicle trip rates; modeled all proposed land uses in the health risk assessment model; included the correct amount of material export and demolition; omitted the unsubstantiated changes to the construction trip lengths, construction trip numbers, CO₂ intensity factor, architectural coating areas, acres of grading values, fireplace values, and woodstove values; as well as excluded the unsubstantiated Tier 4 Final mitigation, construction-related mitigation measures, and operational mitigation measures. Our updated analysis estimates that the Project’s construction-related ROG, NO_x, PM₁₀, and PM_{2.5} emissions exceed the 137-, 250-, 100-, 55-pounds per day (“lbs/day”) thresholds set by the SDAPCD, respectively, as referenced by the DEIR (see table below) (p. 5.3-27, Table 5.3-5).

Model	ROG	NO _x	PM ₁₀	PM _{2.5}
DEIR Construction	63.87	78.01	48.48	9.06
SWAPE Construction	296.94	401.90	1,184.96	143.56
% Increase	365%	415%	2,344%	1,485%
SDAPCD Regional Threshold (lbs/day)	137	250	100	55
Threshold Exceeded?	Yes	Yes	Yes	Yes

³⁴ “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

05-2-16 The Final EIR is updated as reflected in **Responses to Comment 05-2-4** through **05-2-14** and changes to the Draft EIR are included in Section 5.3 and 5.5 of the Final EIR. As shown in these sections, the corrections do not result in a change in any significance determination previously disclosed in the Draft EIR, nor do they indicate a substantially more severe environmental impact than was previously disclosed. Therefore, the analysis presented within this comment does not reflect the project design features, regulatory measures, and measures consistent with the City’s Climate Action Plan. The commenters analysis is thus not an accurate depiction of the project’s impacts to air quality.

O5-2-15
Cont.

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As demonstrated above, when modeled correctly, the Project's construction-related ROG, NO_x, PM₁₀, and PM_{2.5} emissions increase by approximately 365%, 415%, 2,344%, and 1,485%, respectively, and exceed the applicable SDAPCD thresholds.

Furthermore, our updated analysis demonstrates that the Project's operational ROG, CO, PM₁₀, and PM_{2.5} emissions exceed the 137-, 550-, 100-, and 55-lbs/day thresholds set by the SDAPCD, as referenced by the DEIR (see table below) (p. 5.3-27, Table 5.3-5).

Model	ROG	CO	PM ₁₀	PM _{2.5}
DEIR Operation	47.50	332.17	49.41	17.18
SWAPE Operation	1,882.24	2,504.52	374.84	334.07
% Increase	3,863%	654%	659%	1,845%
SDAPCD Regional Threshold (lbs/day)	137	550	100	55
Threshold Exceeded?	Yes	Yes	Yes	Yes

As demonstrated above, when modeled correctly, the Project's operational ROG, CO, PM₁₀, and PM_{2.5} emissions increase by approximately 3,863%, 654%, 659%, and 1,845%, respectively, and exceed the SDAPCD thresholds.

Finally, our updated analysis demonstrates that the maximum daily ROG, NO_x, CO, PM₁₀, and PM_{2.5} emissions associated with Project construction and operation together exceed the 137-, 250-, 550-, 100- and 55-lbs/day thresholds set by the SDAPCD, as referenced by the DEIR (see table below) (p. 5.3-27, Table 5.3-5).

Model	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
DEIR Construction and Operation	111.37	233.06	479.81	97.89	26.24
SWAPE Construction and Operation	2,179.18	488.81	2,954.80	1,559.70	477.63
% Increase	1,857%	110%	516%	1,493%	1,720%
SDAPCD Regional Threshold (lbs/day)	137	250	550	100	55
Threshold Exceeded?	Yes	Yes	Yes	Yes	Yes

As demonstrated above, when modeled correctly, the Project's construction and operational ROG, NO_x, CO, PM₁₀, and PM_{2.5} emissions increase by approximately 1,857%, 110%, 516%, and 1,720%, respectively, and exceed the SDAPCD thresholds.

Thus, our models demonstrate that the Project would result in a potentially significant air quality impact that was not previously identified or addressed in the DEIR. As a result, an updated EIR should be prepared to adequately assess and mitigate the potential air quality and health risk impacts that the Project may have on the surrounding environment.

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Cont.

Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The DEIR conducts quantitative health risk assessments ("HRA(s)") evaluating the health impacts posed to sensitive receptors as a result of Project construction and the Project's proximity to the I-15 Freeway (p. 5.3-32, 5.3-33). Specifically, the DEIR estimates that the cancer risks posed to on-site and off-site sensitive receptors as a result of Project construction would be 5.11 and 0.4-in one million, respectively, both of which would not exceed the SDAPCD threshold of 10 in one million (see excerpt below) (p. 5.3-32, Table 5.3-9).

Impact Parameter	Units	Project Impact	CEQA Threshold	Level of Significance
Offsite				
Cancer Risk	Per Million	5.11	10.0	Less than Significant
HIC	Not Applicable	0.002	1.0	Less than Significant
Onsite				
Cancer Risk	Per Million	0.4	10.0	Less than Significant
HIC	Not Applicable	0.0002	1.0	Less than Significant

Furthermore, the DEIR estimates that the cancer risk posed to sensitive receptors as a result of the Project's proximity to the I-15 Freeway would be 7.2 in one million, which would not exceed the SDAPCD threshold of 10 in one million (see excerpt below) (p. 5.3-33, Table 5.3-10).

Impact Parameter	Units	Impact Level	CEQA Threshold
Maximum Individual Cancer Risk – Residential	Per Million	7.2	10
Chronic Hazard Index – Residential	Index Value	0.002	1.0

However, the DEIR's evaluation of the Project's potential health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for four reasons.

First, the DEIR's construction HRA is incorrect, as it relies upon emissions estimates from underestimated air models (Appendix H, p. 30). As previously discussed, when we reviewed the Project's CalEEMod output files, provided in the Technical Report as Appendix H to the DEIR, we found that several of the values inputted into the model were not consistent with information disclosed in the DEIR and associated documents. As a result, the HRA utilizes an underestimated diesel particulate matter ("DPM") concentration to calculate the cancer risk associated with Project construction. As such, the DEIR underestimates the Project's construction-related cancer risk and should not be relied upon to determine Project significance.

Second, while the DEIR quantifies the cancer risk posed to *future, on-site* receptors as a result of the Project's proximity to the I-15 Freeway, the DEIR fails to prepare a health risk assessment ("HRA") evaluating the cancer risk posed to *nearby, existing* receptors as a result of Project operation. Project operation will generate 8,282 daily vehicle trips, which will generate additional exhaust emissions and continue to expose nearby sensitive receptors to DPM emissions (p. 5.2-9). Furthermore, the omission of a quantified operational HRA is inconsistent with the most recent guidance published by OEHHHA. The

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As discussed in **Response to Comment 05-2-4** and **05-2-9**, to account for the additional truck trips from material import and demolition quantities, the construction health risk assessment was updated in Section 5.3 of the Final EIR. The corrections do not result in a change in any significance determination previously disclosed in the Draft EIR, nor do they indicate a substantially more severe environmental impact than was previously disclosed.

The requirement for a freeway health risk assessment is to determine impacts to future sensitive receptors from existing conditions. There is no basis for evaluating existing conditions on existing sensitive receptors, which the commenter alludes. Furthermore, as discussed in **Response to Comment 05-2-11**, the project would not generate toxic air contaminant emissions during operation based on the land use necessitating the need to evaluate health impacts to off-site sensitive receptors from the project's operational emissions.

The comment states that Office of Environmental Health Hazard Assessment (OEHHHA) guidance recommends performing health risk assessments on projects lasting more than 6 months for an exposure duration of 30 years. The comment simply pasted parts of the OEHHHA guidance together to make it seem like OEHHHA recommends preparing an health risk assessment for the project. The excerpt from the OEHHHA guidance is presented below for reference on page 8-18.

"Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend

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OEHHA document recommends that exposure from projects lasting more than 6 months be evaluated for the duration of the project and recommends that an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident ("MEIR").³⁵ Even though we were not provided with the expected lifetime of the Project, we can reasonably assume that the Project will operate for at least 30 years, if not more. Therefore, we recommend that health risk impacts from Project operation also be evaluated, as a 30-year exposure duration vastly exceeds the 6-month requirement set forth by OEHHA. These recommendations reflect the most recent state health risk policies, and as such, we recommend that an updated assessment of health risk impacts posed to nearby sensitive receptors from Project construction and operation be included in an updated EIR for the Project.

Third, while the DEIR includes separate construction and roadway HRAs, the DEIR fails to evaluate the cumulative lifetime cancer risk to nearby, existing receptors as a result of Project construction and operation together. According to OEHHA guidance, as referenced by the DEIR's HRA, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location".³⁶ However, the DEIR fails to conduct both a construction-related and operational HRA, as well as sum each age bin to evaluate the total cancer risk over the course of Project construction and operation. This is incorrect and thus, an updated EIR should be prepared, quantifying the Project's construction and operational cancer risks and summing them to compare to the SDAPCD threshold of 10 in one million.

Fourth, the DEIR's cancer risk estimate of 7.2 in one million should not be considered in isolation. Additional impacts related to non-cancer health risks have been documented for those people living near congested roadways. Key findings from a 2005 California Air Resources Board ("CARB") report³⁷ on health risk impacts from nearby freeways include:

- Reduced lung function in children was associated with traffic density, especially trucks, within 1,000 feet and the association was strongest within 300 feet.
- Increased asthma hospitalizations were associated with living within 650 feet of heavy traffic and heavy truck volume. (Lin, 2000)
- Asthma symptoms increased with proximity to roadways and the risk was greatest within 300 feet. (Venn, 2001)
- A San Diego study found increased medical visits in children living within 550 feet of heavy traffic. (English, 1999)

People housed by the proposed Project will be located directly west of the I-15 Freeway. Therefore, many of the Project's residents will be subjected to additional non-cancer health risks as a result of close

³⁵ "Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, available at: http://oehha.ca.gov/air/hot_spots/2015/2015GuidanceManual.pdf, p. 8-6, 8-15

³⁶ "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>, p. 8-4

³⁷ "Air Quality and Land Use Handbook: A Community Health Perspective." CARB, April 2005, available at: <https://ww3.arb.ca.gov/ch/handbook.pdf>.

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Cont.

assessing cancer risk for projects lasting less than two months at the MEIR. We recommend that exposure from projects longer than 2 months, but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months). Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA 2009)."

As shown above, the reference was to how OEHHA evaluates construction health risk, not operational. While OEHHA does recommend evaluating health risk during operation for 30 years, as discussed above and in **Response to Comment O5-2-11**, the project would not generate toxic air contaminant emissions during operation.

Regarding the evaluation of combining health risks of construction and operation, this approach is materially incorrect for several reasons. The thresholds for health risk are based on specific phases of a project, either construction or operation. The construction health risk assessment evaluates the health risk posed to existing sensitive receptors from construction of the project. The freeway health risk assessment evaluates the health risk posed to future project residents located by the freeway. Thus, the health risks from each separate study are not to be combined, rather they need to be evaluated separately. The control measures or

proximity to the I-15 Freeway. Regarding risks posed to people living nearby busy roadways, CARB concludes:

"The combination of the children's health studies and the distance related findings suggests that it is important to avoid exposing children to elevated air pollution levels immediately downwind of freeways and high traffic roadways. These studies suggest a substantial benefit to a 500-foot separation."³⁸

As a result, CARB recommends that projects:

"[a]void siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day."³⁹

Despite this recommendation, asthma and other non-cancer, freeway-related health risks are not mentioned or assessed by the DEIR. As such, an updated EIR should be prepared to include an assessment of all risks faced by residents at the Project not only cancer, especially to sensitive groups, such as newborns and the elderly. Because of the proximity to the I-15 Freeway, all feasible mitigation should be considered in the updated EIR to reduce health impacts to people living at the project. Feasible mitigation, implemented at other Southern California projects adjacent to freeways include:

- Disclose to residents the potential health impacts from living in proximity to the I-15 Freeway;
- Installation, use, and maintenance of filtration systems with at least a Minimum Efficiency Reporting Value (MERV) 15;
- Lead Agency verification and certification of the implementation the filtration systems;
- Lead Agency verification of maintenance to include manufacturer's recommended filter replacement schedule;
- Disclosure to residents that opening windows will reduce the health-protectiveness of the filter systems.

Screening-Level Assessment Indicates a Potentially Significant Health Risk Impact

In an effort to demonstrate the potential health risk posed by the construction and operation of the Project to nearby, existing sensitive receptors, we prepared a simple screening-level HRA. The results of our assessment, as described below, demonstrate that the proposed Project would have a potentially significant impact.

In order to conduct our screening-level risk assessment we relied upon AERSCREEN, which is a screening level air quality dispersion model.⁴⁰ The model replaced SCREEN3, and AERSCREEN is included in the

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potential mitigation differs vastly in the construction and operational phases and must be partitioned out rather than combined. Lastly, the freeway health risk assessment is an existing condition analysis and the project has no control over the emissions created by it whereas they do have control over the construction of the project. Therefore, it is not appropriate to combine results of a construction and freeway health risk assessment.

The Draft EIR showed in Section 5.3.4, that new residents of the project would not be exposed to levels of toxic air contaminants (TACs) that would exceed the cancer or non-cancer significance thresholds assuming a 30-year lifetime (as recommended by OEHHA).

³⁸ "Air Quality and Land Use Handbook: A Community Health Perspective." CARB, April 2005, available at: <https://ww3.arb.ca.gov/ch/handbook.pdf>, p. 10.

³⁹ "Air Quality and Land Use Handbook: A Community Health Perspective." CARB, April 2005, available at: <https://ww3.arb.ca.gov/ch/handbook.pdf>, p. 15.

⁴⁰ U.S. EPA (April 2011) AERSCREEN Released as the EPA Recommended Screening Model, http://www.epa.gov/ttn/scram/guidance/clarification/20110411_AERSCREEN_Release_Memo.pdf

OEHHA⁴¹ and the California Air Pollution Control Officers Associated (CAPCOA)⁴² guidance as the appropriate air dispersion model for Level 2 health risk screening assessments ("HRSAs"). A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project.

We prepared a preliminary HRA of the Project's health-related impact to sensitive receptors using the annual PM₁₀ exhaust estimates from the DEIR's annual CalEEMod output files. Consistent with recommendations set forth by OEHHA, we used a residential exposure duration of 30 years, starting from the 3rd trimester stage of life.

The DEIR's annual CalEEMod output file indicates that operational activities will generate approximately 405 pounds of DPM per year over approximately 30 years of operation. The AERSCREEN model relies on a continuous average emission rate to simulate maximum downwind concentrations from point, area, and volume emission sources. To account for the variability in equipment usage and truck trips over Project operation, we calculated an average DPM emission rate by the following equation.

$$\text{Emission Rate} \left(\frac{\text{grams}}{\text{second}} \right) = \frac{405.2 \text{ lbs}}{365 \text{ days}} \times \frac{453.6 \text{ grams}}{\text{lbs}} \times \frac{1 \text{ day}}{24 \text{ hours}} \times \frac{1 \text{ hour}}{3,600 \text{ seconds}} = 0.005828 \text{ g/s}$$

Using this equation, we estimated an operational emission rate of 0.005828 g/s. Operation was simulated as a 164.5-acre rectangular area source in AERSCREEN, with dimensions of 1,479 meters by 450 meters. A release height of three meters was selected to represent the height of stacks of operational equipment and other heavy-duty vehicles, and an initial vertical dimension of one and a half meters was used to simulate instantaneous plume dispersion upon release. An urban meteorological setting was selected with model-default inputs for wind speed and direction distribution.

The AERSCREEN model generates maximum reasonable estimates of single-hour DPM concentrations from the Project Site. EPA guidance suggests that in screening procedures, the annualized average concentration of an air pollutant to be estimated by multiplying the single-hour concentration by 10%.⁴³ According to the DEIR, the closest residential receptors are located adjacent to the Project boundary (p. 5.3-3). However, review of the AERSCREEN output files demonstrates that the *maximally* exposed residential receptor is located 725 meters from the Project site. Thus, for Project operation, the single-hour concentration at the MEIR estimated by AERSCREEN is approximately 0.608 µg/m³ DPM at approximately 725 meters downwind. Multiplying this single-hour concentration by 10%, we get an annualized average concentration of 0.0608 µg/m³ for Project operation at the MEIR.

⁴¹ Supra, fn 20.

⁴² CAPCOA (July 2009) Health Risk Assessments for Proposed Land Use Projects, http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.

⁴³ U.S. EPA (October 1992) Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised, http://www.epa.gov/ttn/scram/guidance/guide/EPA-454R-92-019_OCR.pdf.

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The purpose of the AERSCREEN model is to screen for the possibility of a potential impact. Using this approach to assess project -specific impacts is inferior to the detailed air quality modeling conducted in support of the EIR, for a number of reasons as described below. First, a health risk assessment operational analysis was not required because the project will not generate substantial emissions of toxic air contaminants during operation. Second, a screening-level health risk assessment using AERSCREEN relies upon general non-site-specific variables to calculate concentrations at distances from the source. This model does not take into account site-specific variables that a refined health risk assessment (using a model such as AERMOD) would, including localized meteorological data (wind and temperature), topography, and buildings. Third, the commenter incorrectly assumed that all unmitigated annual PM₁₀ exhaust emissions were used in the calculation during construction. This overestimates the on-site emissions to be used in the assessment because that value includes both on-site and off-site mobile source emissions. For example, the CalEEMod default hauling trip length is 20 miles one-way. That means that the commenter assumed emissions from that entire 40-mile roundtrip were emitted on site, which is incorrect. This remains consistent for worker, vendor, and haul truck trips. Fourth, the annual PM₁₀ exhaust emissions were assumed to be diesel particulate matter which is incorrect. The worker trips during construction are comprised of 50% passenger cars (LDA), 25% Light-Duty Trucks (GVWR <6000 pounds and ETW <= 3750 pounds) (LDT1), and 25% Light-Duty Trucks (GVWR <6000 pounds and ETW 3751-5750 pounds) (LDT2) (CAPCOA 2017). The CalEEMod 2016.3.2 relied upon CARB's EMFAC2014 for the fleet mix and emission factors for

We calculated the excess cancer risk to the MEIR using applicable HRA methodologies prescribed by updated OEHHA guidance from 2015, as recommended by SDAPCD.⁴⁴ Consistent with the construction period of 1,681 days inputted into the DEIR's CalEEMod model, the annualized average concentration for Project operation was used for the remaining 11.64 years of the child stage of life (2 - 16 years), and adult stage of life (16 - 30 years) (Appendix H, pp. 84, 206, 319, 439).

Consistent with OEHHA guidance, as referenced by the Air Quality Technical Report, we used Age Sensitivity Factors ("ASFs") to account for the heightened susceptibility of young children to the carcinogenic toxicity of air pollution (Appendix H, p. 29).⁴⁵ According to the most updated guidance, quantified cancer risk should be multiplied by a factor of ten during the third trimester of pregnancy and during the first two years of life (infant). Furthermore, in accordance with guidance set forth by OEHHA, we used the 95th percentile breathing rates for infants.⁴⁶ Finally, consistent with OEHHA guidance, we used a Fraction of Time At Home ("FAH") Value of 1 for the 3rd trimester and infant receptors.⁴⁷ We used a cancer potency factor of 1.1 (mg/kg-day)⁻¹ and an averaging time of 25,550 days. The results of our calculations are shown in the tables below.

The Maximally Exposed Individual at an Existing Residential Receptor					
Activity	Duration (years)	Concentration (ug/m ³)	Breathing Rate (L/kg-day)	ASF	Cancer Risk with ASFs*
Construction	0.25	N/A	361	10	N/A
3rd Trimester Duration	0.25			3rd Trimester Exposure	N/A
Construction	2.00	N/A	1090	10	N/A
Infant Exposure Duration	2.00			Infant Exposure	N/A
Construction	2.36	N/A	572	3	N/A
Operation	11.64	0.0608	572	3	1.8E-05
Child Exposure Duration	14.00			Child Exposure	1.8E-05
Operation	14.00	0.0608	261	1	2.4E-06

⁴⁴ "Supplemental Guidelines for Submission of Rule 1200 Health Risk Assessments (HRAs)," SDAPCD, July 2019, available at:

https://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Toxics_Program/APCD_1200_Supplemental_Guidelines.pdf

⁴⁵ OEHHA (Feb 2015) Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments, <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>

⁴⁶ SCAQMD (Jun 2015) Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics 'Hot Spots' Information and Assessment Act, p. 19, <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/ab2588-risk-assessment-guidelines.pdf?sfvrsn=6>; see also OEHHA (Feb 2015) Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments, <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>

⁴⁷ SCAQMD (Aug 2017) Risk Assessment Procedures for Rules 1401, 1401.1, and 212, p. 7, http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf

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mobile sources for both construction and operation. CARB's EMFAC2014 assumed that 96% of PM₁₀ (CARB 2015b). Therefore, the commenter assumed all exhaust emissions from worker vehicles were from diesel vehicles and thus emitted diesel particulate matter, whereas only 4% of worker vehicles accounted for in the modeling actually emitted diesel particulate matter, and thus were overestimated. Similarly, the commenter assumed that all PM₁₀ exhaust emissions during operation were from diesel particulate matter. This incorrectly places all exhaust emissions from mobile sources on site. CalEEMod assumes trip lengths of 8.4 miles, 16.6 miles, and 6.9 miles, depending on trip type. The commenter assumed that all trip emissions would occur at the project site, which is incorrect. Only a small fraction of the mobile source emissions would occur on site. CalEEMod assumes a fleet mix during operation of 54.5% LDA, 4.5% LDT1, 20.7% LDT2, 11.8% Medium-Duty Trucks (GVWR 6000-8500 pounds) (MDV), 1.5% Light-Heavy-Duty Trucks (GVWR 8501-10000 pounds) (LHD1), 0.6% Light-Heavy-Duty Trucks (GVWR 10001-14000 pounds) (LHD2), 2.1% medium-heavy-duty truck (MHD), 3.2% heavy-heavy-duty truck (HHD), 0.3% other buses (OBUS), 0.2% urban buses (UBUS), 0.5% motorcycle (MCY), 0.07% school buses (SBUS), and 0.09% motorhomes (MH) (CAPCOA 2017). CARB's EMFAC 2014 assumed that 75.4% of exhaust PM₁₀ emissions came from gasoline fueled vehicles and 24.6% came from diesel vehicles in 2024 (CARB 2015b). Using the CalEEMod fleet mix, the composition of gasoline vehicles assumed in the CalEEMod modeling is 95.4% gasoline fueled and 4.6% diesel fueled. Therefore, the assumption that

Adult Exposure Duration	14.00	Adult Exposure	2.4E-06
Lifetime Exposure Duration	30.00	Lifetime Exposure	2.1E-05

As demonstrated in the table above, the excess cancer risk to adults and children at the MEIR located approximately 725 meters away, over the course of Project operation, are approximately 2.4 and 18 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years), utilizing age sensitivity factors, is approximately 21 in one million. When summing the Project's operational cancer risk, including age sensitivity factors, with the DEIR's estimated construction-related cancer risk of 5.22 in one million, we calculated a lifetime construction and operational cancer risk of 26.22 in one million.⁴⁸ The child, and lifetime operational cancer risks, using age sensitivity factors, exceed the SDAPCD threshold of 10 in one million, thus resulting in a potentially significant impact not previously addressed or identified by the DEIR.⁴⁹

An agency must include an analysis of health risks that connects the Project's air emissions with the health risk posed by those emissions. Our analysis represents a screening-level HRA, which is known to be conservative and tends to err on the side of health protection. The purpose of the screening-level construction and operational HRA shown above is to demonstrate the link between the proposed Project's emissions and the potential health risk. Our screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact, when correct exposure assumptions and up-to-date, applicable guidance are used. Therefore, since our screening-level construction HRA indicates a potentially significant impact, an updated EIR should include a reasonable effort to connect the Project's air quality emissions and the potential health risks posed to nearby receptors. Thus, an updated EIR should include a quantified air pollution model as well as an updated, quantified refined health risk assessment which adequately and accurately evaluates health risk impacts associated with both Project construction and operation.

Greenhouse Gas

Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR relies upon the Project's consistency with the City's Climate Action Plan ("CAP") in order to conclude that the Project would result in a less than significant impact with respect to greenhouse gases ("GHGs") (p. 5.7-23). Specifically, the DEIR states:

"The project would be consistent with City's CAP. Therefore, the project would not conflict with the City's CAP or any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Impacts would be *less than significant*" (p. 5.7-23).

⁴⁸ Calculated: 5.22 in one million + 21 in one million = 26.22 in one million.

⁴⁹ "Rule 1210. Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction." SDAPCD, May 2019, available at: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Toxic_Air_Cotaminants/APCD_R1210.pdf, p. 4.

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all mobile source emissions are diesel particulate matter is inaccurate and misrepresents actual on-site emissions of diesel particulate matter. The alternative analysis does not accurately represent project emissions.

However, review of the City's CAP reveals that the proposed Project is inconsistent with numerous measures, including but not limited to those listed below:

City of San Diego Climate Action Plan ("CAP") Checklist ⁵⁰	
CAP Strategies Consistency	
Strategy 1: Energy & Water Efficient Buildings	
<p>1. Cool/Green Roofs</p> <ul style="list-style-type: none"> Would the project include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code (Attachment A); OR Would the project roof construction have a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code; OR Would the project include a combination of the above two options? 	<p>Here, the Climate Action Plan Consistency Checklist ("CAP Checklist"), provided as Appendix K to the DEIR, states:</p> <p>"The project shall include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than that provided in Table 1 of Attachment A" (Appendix K, p. 5).</p> <p>Furthermore, the DEIR states:</p> <p>"All new development within the project site would include rooftop photovoltaic solar panels, energy-efficient lighting and appliances, cool roofs, energy-efficient windows, and other design features that significantly conserve energy" (p. 3-8).</p> <p>However, these responses are insufficient. As previously stated, according to the AEP CEQA Portal Topic Paper on mitigation measures:</p> <p>"While not "mitigation", a good practice is to <u>include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program [MMRP]</u>. Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, <u>it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of</u></p>

⁵⁰ "Appendix C: Climate Action Plan Consistency Checklist." City of San Diego, available at: https://www.sandiego.gov/sites/default/files/city_of_san_diego_cap_checklist.pdf

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05-2-20

05-2-19 The comment is an introduction to comments that follow. This comment does not raise any specific issues relating to the analyses contained within the Draft EIR.

	<p><i>the design features without understanding the resulting environmental impact</i>" (emphasis added).⁵¹</p> <p>As you can see in the excerpts above, project design features are not mitigation measures and <i>may be eliminated from the Project's design</i>. Here, the DEIR fails to require the use of cool roofs through mitigation, and as a result, we cannot guarantee that this measure would be implemented, monitored, and enforced on the Project site. As such, the DEIR is not consistent with this measure and the DEIR lacks substantial evidence to support its consistency evaluation.</p>
<p>2. Plumbing fixtures and fittings</p> <p>With respect to plumbing fixtures or fittings provided as part of the project, would those low-flow fixtures/appliances be consistent with each of the following:</p> <p>Residential buildings:</p> <ul style="list-style-type: none"> • Kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi; • Standard dishwashers: 4.25 gallons per cycle; • Compact dishwashers: 3.5 gallons per cycle; and • Clothes washers: water factor of 6 gallons per cubic feet of drum capacity? <p>Nonresidential buildings:</p> <ul style="list-style-type: none"> • Plumbing fixtures and fittings that do not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the California Green Building Standards Code (See Attachment A); and • Appliances and fixtures for commercial applications that meet the provisions of Section A5.303 (voluntary measures) of the California Green Building Standards Code (See Attachment A)? 	<p>Here, regarding residential buildings, the CAP Checklist states:</p> <p>"The project shall include low-flow fixtures and appliances consistent with the requirements of this checklist item" (Appendix K, p. 6).</p> <p>Furthermore, regarding non-residential buildings, the CAP Checklist states:</p> <p>"The project shall include low-flow fixtures and appliances consistent with the requirements of this checklist item" (Appendix K, p. 6).</p> <p>Finally, the DEIR states:</p> <p>"The project would include installation of low-flow bathroom and kitchen faucets, low-flow toilets, and low-flow showers. The project would include low-flow fixtures and appliances consistent with the requirements of the CAP checklist" (p. 3-8).</p> <p>However, these responses are insufficient. As previously stated, according to the AEP CEQA Portal Topic Paper on mitigation measures:</p> <p><i>"While not "mitigation", a good practice is to include those project design feature(s) that address environmental impacts in the</i></p>

⁵¹ "CEQA Portal Topic Paper Mitigation Measures." AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

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Cont.

O5-2-20a Regarding cool/green roofs, as outlined in the Draft EIR, the project would include roofing materials with a minimum 3-year aged solar reflection, rooftop solar panels, cool roofs, consistent with the requirements of Step 2 of the City's Climate Action Plan Consistency Checklist. These measures will be enforceable through conditions of approval for the project.

O5-2-20b With regard to plumbing fixtures and fittings, as outlined in Draft EIR Section 5.7, Greenhouse Gases, Table 5.7-1, Climate Action Plan Consistency Checklist, the proposed project would include low-flow fixtures and appliances. These measures are consistent with the requirements of Step 2 of the City's Climate Action Plan Consistency Checklist and will be enforceable through conditions of approval for the project. ¶

O5-2-20c With regard to electric vehicle charging, as outlined in Draft EIR Section 5.7, Greenhouse Gases, Table 5.7-1, Climate Action Plan Consistency Checklist, the proposed project would provide listed cabinets, boxes or enclosures connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of EV supply equipment to provide EV charging stations, and at a minimum 3% of the spaces would have the necessary EV supply equipment installed to provide active EV charging stations ready for use by residents. These measures are consistent with the requirements of Step 2 of the City's Climate Action Plan Consistency Checklist and will be enforceable through conditions of approval for the project.

	<p><i>mitigation monitoring and reporting program (MMRP). Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact” (emphasis added).⁵²</i></p> <p>As you can see in the excerpts above, project design features are not mitigation measures and <u>may be eliminated from the Project’s design</u>. Here, the DEIR fails to require the use of low-flow fixtures and appliances through mitigation, and as a result, we cannot guarantee that this measure would be implemented, monitored, and enforced on the Project site. As such, the DEIR is not consistent with this measure and the DEIR lacks substantial evidence to support its consistency evaluation.</p>
<p>Strategy 3: Bicycle, Walking, Transit & Land Use</p> <p>3. Electric Vehicle Charging</p> <ul style="list-style-type: none"> • <u>Multiple-family projects of 17 dwelling units or less:</u> Would 3% of the total parking spaces required, or a minimum of one space, whichever is greater, be provided with a listed cabinet, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations at such time as it is needed for use by residents? • <u>Multiple-family projects more than 17 dwelling units:</u> Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents? 	<p>Here, regarding residential buildings, the CAP Checklist states:</p> <p>“The project will provide listed cabinets, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations, and at a minimum 3% of the spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents” (Appendix K, p. 7).</p> <p>Furthermore, regarding non-residential buildings, the CAP Checklist states:</p>

⁵² “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://ceqaportal.org/wp/CEQA%20Mitigation%202020.pdf>, p. 6.

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O5-2-20d With regard to designated parking spaces, as outlined in Draft EIR Section 5.7, Greenhouse Gases, Table 5.7-1, Climate Action Plan Consistency Checklist, the project’s non-residential component will have 21 parking spots and would include 2 spaces as designated for low-emitting, fuel-efficient, and carpool/vanpool vehicles. ~~the proposed project is a residential project and does not proposed non-residential uses within a transit priority area; therefore, designated parking spaces are not required.~~

<ul style="list-style-type: none">• <u>Non-residential projects</u>: Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use?	<p>“The project will provide listed cabinets, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations, and at a minimum 50% of the spaces would have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents” (Appendix K, p. 7).</p> <p>However, these responses are insufficient. As previously stated, according to the AEP CEQA Portal Topic Paper on mitigation measures:</p> <p>“While not “mitigation”, a good practice is <u>to include these project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program [MMRP]</u>. Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, <u>it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact</u>” (emphasis added).⁵³</p> <p>As you can see in the excerpts above, project design features are not mitigation measures and <u>may be eliminated from the Project’s design</u>. Here, the DEIR fails to require the installation of necessary electric vehicle supply equipment through mitigation, and as a result, we cannot guarantee that this measure would be implemented, monitored, and enforced on the Project site. As such, the DEIR is not consistent with this measure and the DEIR lacks substantial evidence to support its consistency evaluation.</p>
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⁵³ “CEQA Portal Topic Paper Mitigation Measures.” AEP, February 2020, available at: <https://ceqaportal.org/to/CEQA%20Mitigation%202020.pdf>, p. 6.

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Reduce Outdoor Water Use																			
<p>6. Designated Parking Spaces</p> <p>If the project includes a nonresidential use in a TPA, would the project provide designated parking for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles in accordance with the following table?</p> <table> <tr> <th>Number of Required Parking Spaces</th><th>Number of Designated Parking Spaces</th></tr> <tr> <td>0-9</td><td>0</td></tr> <tr> <td>10-25</td><td>2</td></tr> <tr> <td>26-50</td><td>4</td></tr> <tr> <td>51-75</td><td>6</td></tr> <tr> <td>76-100</td><td>9</td></tr> <tr> <td>101-150</td><td>11</td></tr> <tr> <td>151-200</td><td>18</td></tr> <tr> <td>201 and over</td><td>At least 10% of total</td></tr> </table> <p>This measure does not cover electric vehicles. See Question 4 for electric vehicle parking requirements.</p> <p>Note: Vehicles bearing Clean Air Vehicle stickers from expired HOV lane programs may be considered eligible for designated parking spaces. The required designated parking spaces are to be provided within the overall minimum parking requirement, not in addition to it.</p>		Number of Required Parking Spaces	Number of Designated Parking Spaces	0-9	0	10-25	2	26-50	4	51-75	6	76-100	9	101-150	11	151-200	18	201 and over	At least 10% of total
Number of Required Parking Spaces	Number of Designated Parking Spaces																		
0-9	0																		
10-25	2																		
26-50	4																		
51-75	6																		
76-100	9																		
101-150	11																		
151-200	18																		
201 and over	At least 10% of total																		
<p>Here, the CAP Checklist states:</p> <p>"The project's non-residential component will have 21 parking spots and therefore would include 2 spaces as designated for low-emitting, fuel-efficient, and carpool/vanpool vehicles" (Appendix K, p. 9).</p> <p>However, this response is insufficient. As previously stated, according to the AEP <i>CEQA Portal Topic Paper</i> on mitigation measures:</p> <p>"While not "mitigation", a good practice is <u>to include those project design feature(s) that address environmental impacts in the mitigation monitoring and reporting program (MMRP)</u>. Often the MMRP is all that accompanies building and construction plans through the permit process. If the design features are not listed as important to addressing an environmental impact, <u>it is easy for someone not involved in the original environmental process to approve a change to the project that could eliminate one or more of the design features without understanding the resulting environmental impact</u>" (emphasis added).⁵⁴</p> <p>As you can see in the excerpts above, project design features are not mitigation measures and <u>may be eliminated from the Project's design</u>. Here, the DEIR fails to require 2 parking spaces to be designated for low-emitting, fuel-efficient, and carpool/vanpool vehicles through mitigation, and as a result, we cannot guarantee that this measure would be implemented, monitored, and enforced on the Project site. As such, the DEIR is not consistent with this measure and the DEIR lacks substantial evidence to support its consistency evaluation.</p>																			

As the above table indicates, the DEIR fails to provide sufficient information and analysis to determine Project consistency with all of the measures required by the City's CAP. As a result, we cannot verify that

⁵⁴ "CEQA Portal Topic Paper Mitigation Measures," AEP, February 2020, available at: <https://ceqaportal.org/tp/CEQA%20Mitigation%202020.pdf>, p. 6.

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the Project is consistent with the CAP, and the DEIR's less-than-significant GHG impact conclusion should not be relied upon. We recommend that an updated EIR include further information and analysis demonstrating the Project's consistency with the CAP.

Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project's air quality, health risk, and GHG emissions may result in significant impacts and should be mitigated further. In an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project. Feasible mitigation measures can be found in CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures*.⁵⁵ Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

CAPCOA's Quantifying Greenhouse Gas Mitigation Measures ⁵⁵	
Measures – Energy	
Building Energy Use	
Install Programmable Thermostat Timers	
Obtain Third-party HVAC Commissioning and Verification of Energy Savings	
Lighting	
Install Higher Efficacy Public Street and Area Lighting	
Alternative Energy Generation	
Establish Onsite Renewable or Carbon-Neutral Energy Systems	
Establish Onsite Renewable Energy System – Wind Power	
Utilize a Combined Heat and Power System	
Measures – Transportation	
Land Use/Location	
Increase Density	
Increase Location Efficiency	
Increase Diversity of Urban and Suburban Developments (Mixed Use)	
Increase Destination Accessibility	
Increase Transit Accessibility	
Orient Project Toward Non-Auto Corridor	
Neighborhood/Site Enhancements	
Provide Pedestrian Network Improvements, such as:	
<ul style="list-style-type: none"> • Compact, mixed-use communities • Interconnected street network • Narrower roadways and shorter block lengths • Sidewalks • Accessibility to transit and transit shelters 	

⁵⁵ <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

⁵⁶ "Quantifying Greenhouse Gas Mitigation Measures." California Air Pollution Control Officers Association (CAPCOA), August 2010, available at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, p.

O5-2-21
Cont.

O5-2-22

O5-2-21 Refer to **Master Response 8** and **Response to Comment O1-66**. No revisions or recirculation of the Draft EIR is required.

<ul style="list-style-type: none"> Traffic calming measures and street trees Parks and public spaces Minimize pedestrian barriers
Provide Traffic Calming Measures, such as: <ul style="list-style-type: none"> Marked crosswalks Count-down signal timers Curb extensions Speed tables Raised crosswalks Raised intersections Median islands Tight corner radii Roundabouts or mini-circles On-street parking Planter strips with trees Chicanes/chokers
Create Urban Non-Motorized Zones
Provide Bike Parking with Multi-Unit Residential Projects
Provide Electric Vehicle Parking
Parking Policy/Pricing
Limit Parking Supply through: <ul style="list-style-type: none"> Elimination (or reduction) of minimum parking requirements Creation of maximum parking requirements Provision of shared parking
Unbundle Parking Costs from Property Cost
Implement Market Price Public Parking (On-Street)
Require Residential Area Parking Permits
Transit System Improvements
Transit System Improvements, including: <ul style="list-style-type: none"> Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route. Frequent, high-capacity service High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride. Pre-paid fare collection to minimize boarding delays. Integrated fare systems, allowing free or discounted transfers between routes and modes. Convenient user information and marketing programs. High quality bus stations with Transit Oriented Development in nearby areas. Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.
Implement Transit Access Improvements, such as: <ul style="list-style-type: none"> Sidewalk/crosswalk safety enhancements Bus shelter improvements
Expand Transit Network

O5-2-22
Cont.

05-2-22

As disclosed in the Draft EIR, air quality and greenhouse gas impacts were determined to be less than significant and no mitigation was required. Furthermore, the revisions to Section 5.7 Greenhouse Gas Emissions of the Final EIR do not result in additional impacts beyond what was identified in the Draft EIR. Refer to **Master Response 8** and **Response to Comment O1-66**.

Increase Transit Service Frequency/Speed
Provide Bike Parking Near Transit
Provide Local Shuttles
Road Pricing/Management
Implement Area or Cordon Pricing
Improve Traffic Flow, such as:
<ul style="list-style-type: none"> • Signalization improvements to reduce delay; • Incident management to increase response time to breakdowns and collisions; • Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and • Speed management to reduce high free-flow speeds.
Required Project Contributions to Transportation Infrastructure Improvement Projects
Install Park-and-Ride Lots
Vehicles
Utilize Alternative Fueled Vehicles, such as:
<ul style="list-style-type: none"> • Biodiesel (B20) • Liquefied Natural Gas (LNG) • Compressed Natural Gas (CNG)
Utilize Electric or Hybrid Vehicles
Measures – Water
Water Supply
Use Reclaimed Water
Use Gray Water
Use Locally Sourced Water Supply
Water Use
Adopt a Water Conservation strategy
Measures – Area Landscaping
Landscaping Equipment
Prohibit Gas Powered Landscape Equipment
Implement Lawnmower Exchange Program
Electric Yard Equipment Compatibility
Measures – Construction
Construction
Use Alternative Fuels for Construction Equipment
Use Electric and Hybrid Construction Equipment
Limit Construction Equipment Idling Beyond Regulation Requirements
Institute a Heavy-Duty Off-Road Vehicle Plan, including:
<ul style="list-style-type: none"> • Construction vehicle inventory tracking system; • Requiring hour meters on equipment; • Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment; and • Daily logging of the operating hours of the equipment.

O5-2-22
Cont.

Implement a Construction Vehicle Inventory Tracking System
Measures – Miscellaneous
Miscellaneous
Establish a Carbon Sequestration Project, such as: <ul style="list-style-type: none"> Geologic sequestration or carbon capture and storage techniques, in which CO₂ from point sources is captured and injected underground; Terrestrial sequestration in which ecosystems are established or preserved to serve as CO₂ sinks; Novel techniques involving advanced chemical or biological pathways; or Technologies yet to be discovered.
Establish Off-Site Mitigation
Use Local and Sustainable Building Materials
Require Environmentally Responsible Purchasing, such as: <ul style="list-style-type: none"> Purchasing products with sustainable packaging; Purchasing post-consumer recycled copier paper, paper towels, and stationary; Purchasing and stocking communal kitchens with reusable dishes and utensils; Choosing sustainable cleaning supplies; Leasing equipment from manufacturers who will recycle the components at their end of life; Choosing electronic appliances with built in sleep-mode timers; Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility; and Choosing locally-made and distributed products.
Measures – General Plans
General Plans
Fund Incentives for Energy Efficiency, such as: <ul style="list-style-type: none"> Retrofitting or designing new buildings, parking lots, streets, and public areas with energy-efficient lighting; Retrofitting or designing new buildings with low-flow water fixtures and high-efficiency appliances; Retrofitting or purchasing new low-emissions equipment; Purchasing electric or hybrid vehicles; Investing in renewable energy systems
Establish a Local Farmer's Market
Establish Community Gardens

Furthermore, in an effort to reduce the Project's emissions, we identified several mitigation measures that are applicable to the proposed Project from NEDC's *Diesel Emission Controls in Construction Projects*.⁵⁷ Therefore, to reduce the Project's emissions, consideration of the following measures should be made:

05-2-23 Refer to **Response to Comment 05-2-22**. Moreover, these measures are regulatory measures currently required by CARB.

05-2-22
Cont.

05-2-23

⁵⁷ "Diesel Emission Controls in Construction Projects." Northeast Diesel Collaborative (NEDC), December 2010, available at: <https://www.epa.gov/sites/production/files/2015-09/documents/nedc-model-contract-specification.pdf>.

NEDC's Diesel Emission Controls in Construction Projects ³⁸	
Measures – Diesel Emission Control Technology	
a. Diesel Onroad Vehicles	All diesel onroad vehicles on site for more than 10 total days must have either (1) engines that meet EPA onroad emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
b. Diesel Generators	All diesel generators on site for more than 10 total days must be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
c. Diesel Nonroad Construction Equipment	<ul style="list-style-type: none"> i. Tier 0 and Tier 1 engines are not allowed on site. ii. All diesel nonroad construction equipment on site for more than 10 total days must have either (1) engines meeting EPA Tier 4 Final nonroad emission standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines 50hp and greater and by a minimum of 20% for engines less than 50hp.
d. Upon confirming that the diesel vehicle, construction equipment, or generator has either an engine meeting Tier 4 non road emission standards or emission control technology, as specified above, installed and functioning, the developer will issue a compliance sticker. All diesel vehicles, construction equipment, and generators on site shall display the compliance sticker in a visible, external location as designated by the developer.	
e. Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.	
Measures – Additional Diesel Requirements	
a. Construction shall not proceed until the contractor submits a certified list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:	<ul style="list-style-type: none"> i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
b. If the contractor subsequently needs to bring on site equipment not on the list, the contractor shall submit written notification within 24 hours that attests the equipment complies with all contract conditions and provide information.	
c. All diesel equipment shall comply with all pertinent local, state, and federal regulations relative to exhaust emission controls and safety.	
d. The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.	

³⁸ "Diesel Emission Controls in Construction Projects." Northeast Diesel Collaborative (NEDC), December 2010, available at: <https://www.epa.gov/sites/production/files/2015-09/documents/nedc-model-contract-specification.pdf>.

O5-2-23
Cont.

Reporting
a. For each onroad diesel vehicle, nonroad construction equipment, or generator, the contractor shall submit to the developer's representative a report prior to bringing said equipment on site that includes: <ul style="list-style-type: none">i. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, and engine serial number.ii. The type of emission control technology installed, serial number, make, model, manufacturer, and EPA/CARB verification number/level.iii. The Certification Statement signed and printed on the contractor's letterhead.
b. The contractor shall submit to the developer's representative a monthly report that, for each onroad diesel vehicle, nonroad construction equipment, or generator onsite, includes: <ul style="list-style-type: none">i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.ii. Any problems with the equipment or emission controls.iii. Certified copies of fuel deliveries for the time period that identify:<ul style="list-style-type: none">1. Source of supply2. Quantity of fuel3. Quality of fuel, including sulfur content (percent by weight)

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An updated EIR should be prepared to include all feasible mitigation measures, as well as include an updated health risk and GHG analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The updated EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,


Matt Hagemann, P.G., C.Hg.


Paul E. Rosenfeld, Ph.D.

O5-2-24 Comment noted.

O5-2-23
Cont.

O5-2-24

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Comment Letter O5-3



February 8, 2021

Everett DeLano
DeLano & DeLano
220 West Grand Avenue
Escondido, CA 92025

**SUBJECT: REVIEW OF BIOLOGICAL RESOURCE ISSUES
TRAILS AT CARMEL MOUNTAIN RANCH DRAFT EIR
CITY OF SAN DIEGO**

Dear Mr. DeLano,

At your request, Hamilton Biological, Inc., has reviewed the Draft EIR (DEIR) for the proposed Trails at Carmel Mountain Ranch project, located in the City of San Diego, San Diego County, California.

I reviewed relevant portions of the DEIR's Section 5.4 (Biological Resources) and Appendix J (Biological Resources Technical Report).

Hamilton Biological is a consultancy specializing in field reconnaissance, regulatory compliance, preparing CEQA documentation, and providing third-party review of CEQA documentation. This review has the following purposes:

- To identify any areas in which the document reaches conclusions not supported by adequate field work or thorough review of the scientific literature.
- To identify and discuss any biological impact analyses not consistent with CEQA, its guidelines, or relevant precedents.
- To evaluate the project alternatives to determine whether one or more of them may better protect sensitive biological resources.
- To recommend changes to impact analyses, mitigation measures, and/or resource management practices to avoid or minimize to the maximum extent practicable potentially significant impacts to biological resources, as required under CEQA.

FIELD VISIT

As part of my evaluation of the DEIR and its adequacy, I visited portions of the project site with botanist James Bailey on January 22, 2021, from 11:30 a.m. to 3:10 p.m. Temperature was 63–59° F; wind was 3–6 mph; cloud cover was approximately 90 percent. The purpose of the field visit was to review portions of the project site to evaluate the accuracy and adequacy of the DEIR's information.

316 Monrovia Avenue Long Beach, CA 90803 562-477-2181 robb@hamiltonbiological.com

**Response to Comment Letter Enclosure O5-3
Hamilton**

- O5-3-1** The City acknowledges this comment as an introduction to the comment letter. The comment does not raise any specific issues relating to the adequacy of the analyses contained within the project Draft EIR.
- O5-3-2** No further details regarding what “portions” of the site were visited is provided. The comment does not raise any specific issues relating to the adequacy of the analyses contained within the project Draft EIR.

O5-3-1

O5-3-2

INADEQUATE SURVEY EFFORT VIOLATES CITY'S BIOLOGY GUIDELINES

Page 7 in the Biological Resources Technical Report (Appendix I to the DEIR) describes the survey effort for the DEIR:

Biological field surveys for the proposed project were conducted in July and August 2019, by Dudek biologists Patricia Schuyler, Tricia Wotipka, and Olivia Koziel. Field surveys included vegetation and land cover mapping, habitat quality assessment, and jurisdictional resource delineation. Table 1 lists the survey dates, times, surveying biologists, and weather conditions during the survey.

As documented herein, the four days of biological surveys conducted in summer 2019 (July 8, July 19, August 8, and August 22) failed to adequately document the plant and wildlife species present, or potentially present, on the site.

Plant Surveys Inadequate

The DEIR's Plant Compendium, listing all of the plant taxa observed on the project site, contains only 22 native taxa and 20 non-native taxa (*Washingtonia filifera* is erroneously listed as a native species), for a total of 42 taxa.

During a site visit lasting less than four hours, on January 22, 2021, Hamilton Biological observed 52 native taxa, 73 non-native taxa, and one taxon of uncertain provenance, for a total of 126 taxa. We observed the following taxa on the site, including four special-status species not recorded by the project biologists (California Native Plant Society [CNPS] rankings are indicated for those taxa, with footnotes explaining the CNPS Rankings, as defined by CNPS).

SECTION: GYMNOSPERMS

Cupressaceae – Cypress Family

* *Juniperus* sp., juniper species

Pinaceae - Pine Family

* *Pinus halepensis*, Aleppo Pine

* *Pinus canariensis*, Canary Island Pine

Podocarpaceae - Southern Conifer Family

* *Afrocarpos gracilior*, East African Yellow-wood

SECTION: EUDICOTS

Adoxaceae – Elder Family

Sambucus nigra ssp. *caerulea*, Blue Elderberry

Aizoaceae – Amaranth Family

* *Carpobrotus edulis*, Freeway Iceplant

* *Drosanthemum floribundum*, Pale Dewplant

05-3-3

The City's Biology Guidelines allow for different types of surveys to be prepared depending on "...the biological resources present, degree of disturbance, proximity to developed areas, and type of project proposed." In addition to the portions of the Biology Guidelines referenced by the commenter, the guidelines also state that "Completeness of the biological inventory will be based on a 'diminishing returns' criterion; the level of effort should be based on significance of resources present."

Given the disturbed nature of the majority of the project footprint, general rather than focused surveys were determined to be adequate for the proposed project and in accordance with City Biology Guidelines. While additional species could be present in the native portions of the site, a comprehensive list of species occurring throughout the site was not needed to inform project impact assessment.

The Final EIR has been revised to clarify that while sensitive species have a moderate to high potential to occur in the vicinity and in remnant habitat on the perimeter of the site, these species have a low potential to be present in most of the project footprint.

No significant resources were expected to be present in the development footprint that is comprised of developed golf course facilities. Thus, surveys were performed at a time when it was determined that available resources could be evaluated, in accordance with City Biology Guidelines.

Although brush management would occur within native habitat on-site, activities in Brush Management

05-3-3

05-3-4

05-3-5

Zone 2 would be considered impact neutral. Specifically, brush management would comply with City of San Diego Brush Management Policy <https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/brushpolicy.pdf>. The Final EIR has been revised to clarify that all activities anticipated in native habitat would be conducted according to these policies and supervised by a qualified biologist who would direct flagging and avoidance of sensitive species.

O5-3-4 The comment then asserts that *Washingtonia filifera* is erroneously listed as a native species. However, this species is native to California and therefore the Draft EIR and biological resources technical report correctly list *Washingtonia filifera* as a native species (Calflora 2021). Therefore, no further response is required.

O5-3-5 Comment noted.

Review of Biological Issues, Trails at Carmel Mountain Ranch DEIR
February 8, 2021

Hamilton Biological, Inc.
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Amaranthaceae – Amaranth Family

- * *Chenopodium murale*, Nettle-leaved Goosefoot
- * *Salsola australis*, Southern Russian Thistle
- * *Salsola tragus*, Prickly Russian Thistle

Anacardiaceae - Cashew Family

- Malosma laurina*, Laurel Sumac
- Rhus integrifolia*, Lemonade Berry
- * *Schinus molle*, Peruvian Pepper Tree
- * *Schinus terebinthifolius*, Brazilian Pepper Tree
- * *Searsia lancea*, African Sumac

Apiaceae - Parsley Family

- * *Conium maculatum*, Poison Hemlock
- * *Foeniculum vulgare*, Sweet Fennel

Apocynaceae - Dogbane Family

- * *Nerium oleander*, Oleander

Asteraceae - Sunflower Family

- Ambrosia psilostachya*, Western Ragweed
- Artemisia californica*, California Sagebrush
- Artemisia douglasiana*, Douglas's Sagewort
- Baccharis pilularis*, Coyote Brush
- Baccharis salicifolia*, Mulefat
- Baccharis sarothroides*, Desert Broom
- * *Centaurea melitensis*, Tocalote
- Corethrogyne filaginifolia*, California Aster
- * *Cirsium vulgare*, Bull Thistle
- * *Cynara cardunculus*, Artichoke Thistle
- * *Dittrichia graveolens*, Stinkwort
- Encelia californica*, California Bush Sunflower
- * *Erigeron bonariensis*, Argentine Fleabane
- Erigeron canadensis*, Canadian Horseweed
- * *Erigeron sumatrensis*, Tropical Fleabane
- * *Euryops pectinatus* 'viridis', African Bush Daisy cultivar
- Helminthotheca echioides*, Bristly Oxtongue
- Heterotheca grandiflora*, Telegraph Weed
- Isocoma menziesii*, Coast Goldenbush
- Iva hayesiana*, San Diego Marsh Elder (CNPS Rank 2B.2)¹
- * *Lactuca serriola*, Prickly Lettuce
- * *Osteospermum* sp., Daisybush species
- Pseudognaphalium biolettii*, Bicolor Rabbit-Tobacco
- Pseudognaphalium californicum*, California Rabbit-Tobacco
- * *Pseudognaphalium luteoalbum*, Jersey Cudweed

O5-3-5
Cont.

¹ All of the plants constituting California Rare Plant Rank 2B meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and are eligible for state listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380.

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* *Sonchus oleraceus*, Smooth Sowthistle
* *Sonchus asper*, Prickly Sowthistle
Stephanomeria diegensis, San Diego Wirelettuce
Viguiera [*Bahiopsis*] *laciniata*, San Diego Viguiera (CNPS Rank 4.3)²

Bignoniaceae - Bignonia Family
* *Tecoma capensis*, Cape Honeysuckle

Brassicaceae - Mustard Family
* *Brassica nigra*, Black Mustard
* *Hirschfeldia incana*, Shortpod Mustard
Nasturtium officinale, Watercress

Cactaceae - Cactus Family
Opuntia sp., prickly-pear

Cistaceae - Rockrose Family
* *Cistus* sp., rockrose

Curcubitaceae - Gourd Family
Marah macrocarpa, Manroot

Ericaceae - Madrone Family
* *Arbutus* × *andrachnoides* ‘Marina’, Strawberry Tree cultivar

Euphorbiaceae - Spurge Family
* *Euphorbia maculata*, Spotted Spurge
* *Euphorbia peplus*, Petty Spurge
* *Ricinus communis*, Castor Bean

Fabaceae - Pea Family
* *Acacia redolens*, Bank Catclaw
Acmispon glaber, Deerweed
* *Calliandra haematocephala*, Scarlet Powder-Puff
* *Erythrina caffra*, African Coral Tree
* *Melaleuca nesophila*, Showy Honey-Myrtle
* *Melilotus albus*, White Sweetclover

Fagaceae - Oak Family
Quercus agrifolia, Coast Live Oak
* *Quercus illex*, Holm Oak

² Some of the plants constituting California Rare Plant Rank 4 meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and few, if any, are eligible for state listing. Nevertheless, many of them are significant locally, and we strongly recommend that California Rare Plant Rank 4 plants be evaluated for impact significance during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, based on CEQA Guidelines §15125 (c) and/or §15380.

O5-3-5
Cont.

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Geraniaceae - Geranium Family

- * *Erodium cicutarium*, Common Storksbill
- * *Geranium molle*, Dove's-foot Cranesbill

Grossulariaceae - Gooseberry Family

- ? *Ribes viburnifolium*, Catalina Currant (CNPS Rank 1B.2)³

Lamiaceae - Mint Family

- * *Lavandula dentata*, French Lavender
- Salvia mellifera*, Black Sage

Malvaceae - Mallow Family

- * *Hibiscus rosa-sinensis*, Chinese Hibiscus
- Malacothamnus fasciculatus*, Chaparral Bushmallow

Myrtaceae - Myrtle Family

- * *Eucalyptus camaldulensis*, River Red Gum
- * *Eucalyptus* sp., eucalyptus
- * *Melaleuca viminalis*, Weeping Bottlebrush

Onagraceae - Dock Family

- Epilobium brachycarpum*, Panicked Willowherb
- Oenothera elata*, Hooker's Evening Primrose

Oleaceae - Olive Family

- * *Fraxinus uhdei*, Shamel Ash

Oxalidaceae - Woodsorrel Family

- * *Oxalis pes-caprae*, Bermuda Buttercup

Polemoniaceae - Pink Family

- Eriastrum sapphirinum*, Sapphire Woollystar

Polygonaceae - Dock Family

- Eriogonum fasciculatum*, California Buckwheat
- * *Rumex crispus*, Curly Dock

Pittosporaceae - Cheesewood Family

- * *Pittosporum tobira*, Japanese Cheesewood

Plantaginaceae - Plantain Family

- Penstemon spectabilis*, Showy Penstemon

O5-3-5
Cont.

³ All of the plants constituting California Rare Plant Rank 1B meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and are eligible for state listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125; (c) and/or §15380. It is not clear whether *Ribes viburnifolium* we observed near Chicarita Creek represents a native or cultivated population of this taxon, which is known from scattered sites in San Diego County in addition to the main population on Santa Catalina Island.

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Platanaceae - Plane Family

Platanus racemosa, Western Sycamore

Plumbaginaceae - Leadwort Family

* *Plumbago auriculata*, Cape Leadwort

Primulaceae - Primrose Family

* *Lysimachia arvensis*, Scarlet Pimpernel

Rosaceae - Rose Family

* *Cotoneaster lacteus*, Late Cotoneaster
Heteromeles arbutifolia, Toyon
Prunus ilicifolia ssp. *lyonii*, Catalina Cherry
* *Pyracantha* sp., firethorn

Rhamnaceae - Buckthorn Family

Adolphia californica, California Adolphia (CNPS Rank 2B.1)⁴
* *Ceanothus* sp., California Lilac Cultivar
Rhamnus crocea, Redberry Buckthorn

Salicaceae - Willow Family

Populus fremontii, Fremont Cottonwood
Salix gooddingii, Goodding's Willow
Salix lasiolepis, Arroyo Willow

Sapindaceae - Soapberry Family

* *Cupaniopsis anacardioides*, Carrotwood
* *Koelreuteria* sp., golden rain tree

Scrophulariaceae - Soapberry Family

* *Myoporum parvifolium*, Creeping Ngaio
* *Myoporum* sp., myoporum cultivar

Solanaceae - Nightshade Family

* *Nicotiana glauca*, Tree Tobacco
Solanum sp., nightshade

Tamariceae - Tamarisk Family

* *Tamarix ramosissima*, Salt Cedar

Ulmaceae - Ash Family

* *Ulmus parvifolia*, Chinese Elm

Verbenaceae - Vervain Family

* *Lantana montevidensis*, Creeping Lantana

O5-3-5
Cont.

⁴ All of the plants constituting California Rare Plant Rank 2B meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and are eligible for state listing. Impacts to these species or their habitat must be analyzed during preparation of environmental documents relating to CEQA, or those considered to be functionally equivalent to CEQA, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380.

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Vitaceae – Grape Family
Vitis girdiana, Desert Wild Grape

SECTION: MONOCOTS

Arecaceae – Palm Family
* *Phoenix canariensis*, Canary Island Palm
* *Washingtonia robusta*, Mexican Fan Palm

Asparagaceae – Asparagus Family
* *Asparagus aethiopicus*, Sprenger's Asparagus

Cyperaceae – Sedge Family
Cyperus eragrostis, Pale Galingale
Cyperus laevigatus, Smooth Flatsedge
Cyperus niger, Black Flatsedge
Schoenoplectus sp., tule

Juncaceae – Rush Family
Juncus cf. *effusus*, rush

Poaceae – Grass Family
* *Bromus rubens*, Red Brome
* *Cortaderia selloana*, Pampas Grass
* *Cynodon dactylon*, Bermuda Grass
Distichlis spicata, Salt Grass
Elymus sp., wild rye
* *Ehrharta erecta*, Panic Veldtgrass
Muhlenbergia rigens, Deergrass
* *Pennisetum setaceum*, Fountain Grass
* *Polypogon monspeliensis*, Rabbitfoot Grass
* *Polypogon viridis*, Water Bent
Stipa pulchra, Purple Needlegrass

Typhaceae – Cattail Family
Typha domingensis, Southern Cattail

05-3-6 Refer also to **Response 05-3-3.**

05-3-7 Comment noted.

O5-3-5
Cont.

Our survey effort covered only a small portion of the project site and was completed in less than half a day in January. Nevertheless, we detected **three times** more plant taxa than the EIR preparer did (126 vs. 42), including more than **double** the number of native plant taxa (52 vs. 22). The admitted limitations of our own brief, incomplete, mid-winter survey serve to demonstrate the gross inadequacy of the botanical surveys that Dudek completed for the DEIR.

O5-3-6

Hamilton Biological detected **five populations of four special-status plant species** – San Diego Marsh Elder (*Iva hayesiana*), San Diego Viguiera (*Viguiera* [*Bahiopsis*] *laciniata*), Catalina Currant (*Ribes viburnifolium*), and California Adolphia (*Adolphia californica*) – none of which the project biologists recorded on the site. Figure 1, on the next page, shows the locations of these plants on the site.

O5-3-7

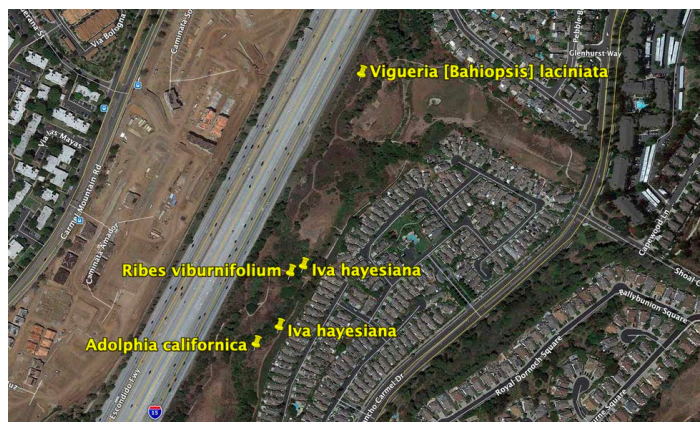


Figure 1. Locations of five populations of four special-status plant taxa along Chicarita Creek on the project site, as recorded by Hamilton Biological on January 22, 2021. Aerial source: Google Earth Pro.

Many plant species, including some special-status taxa, are annuals detectable only during their spring flowering period. **Thus, it is to be expected that many additional plant species are present on the project site that have not yet been detected.** This is why biological surveys conducted for CEQA review purposes normally include spring botanical surveys.

Page 7 in the DEIR's Biological Resources Technical Report (Appendix I to the DEIR) states, "All biological surveys were conducted in accordance with the City's Guidelines for Conducting Biological Surveys (Appendix II in City of San Diego 2018a)." This is not true. For example, Page 81 of Appendix II states:

If sensitive species (e.g., listed threatened or endangered species, candidate species, etc.) are on the site or are likely to be present, Focused Survey Reports will be required. Focused Survey Reports shall follow any required state or federal agency protocols where appropriate.

Page 82 of Appendix II states:

It is highly recommended that field surveys be performed when the majority of critical resources can be best evaluated. Some survey times are mandated per protocol established by state and federal agencies for certain species (e.g., Quino checkerspot butterfly).

O5-3-8 Focused plant surveys were not conducted or necessary (see **Response to Comment O5-3-6**) Sensitive species with potential to occur are described in Section 3.2.5, Special-Status Plants. However, the Draft EIR states in Section 5.4.1 that the project would not result in impacts to native habitat and therefore rare plant surveys were not conducted. Refer to **Response to Comment S2-15**.

O5-3-9 Refer to **Response to Comment O5-3-6**.

O5-3-7
Cont.

O5-3-8

O5-3-9

Page 23 of the DEIR's Biological Technical Report states:

Sensitive plant species that were determined to have moderate to high potential to occur within the project site include the following (none of which are federally or state-listed species): California adolphia (*Adolphia californica*)*, San Diego sagewort (*Artemisia palmeri*), Coulter's saltbush (*Atriplex coulteri*), San Diego County viguiera (*Bahiopsis laciniata*)*, San Diego barrel cactus (*Ferocactus viridescens*), graceful tarplant (*Holocarpha virgata* ssp. *elongata*), San Diego marsh-elder (*Iva hayesiana*)*, southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), Brewer's calandrinia (*Calandrinia breweri*), small-flowered morning glory (*Convolvulus simulans*), snake cholla (*Cylindropuntia californica* var. *californica*), western dichondra (*Dichondra occidentalis*), Palmer's grapplinghook (*Harpagonella palmeri*), Robinson's peppergrass (*Lepidium virginicum* var. *robinsonii*), golden-rayed pentachaeta (*Pentachaeta aurea* ssp. *aurea*), Nuttall's scrub oak (*Quercus dumosa*), chaparral ragwort (*Senecio aphanactis*), San Diego County needle grass (*Stipa diegoensis*), and rush-like bristleweed (*Xanthisma junceum*).

* Species detected on the project site by Hamilton Biological.

The City's Biology Guidelines specify that, where special-status species "are on the site or likely to be present, Focused Survey Reports will be required." The limited surveys that Dudek conducted in July and August 2019 were not designed to determine the status of numerous special-status species known to be present on the site, or that have moderate or high potential to be present. **Dudek's field surveys were not conducted "when the majority of critical resources can be best evaluated."** Dudek's surveys detected fewer than half the species that Hamilton Biological detected in less than four hours. **Therefore, Dudek's surveys were not "conducted in accordance with the City's Guidelines for Conducting Biological Surveys."** Compliance with the Guidelines requires completion of adequate biological surveys, including spring surveys for special-status plants.

Jurisdictional Delineation Incomplete

Appendix E to the DEIR's Biological Resources Technical Report is Dudek's jurisdictional delineation, which claims to identify all of the wetland resources present on the project site. Page 21 of Appendix E characterizes Features Q and R—areas that lie outside of proposed grading areas for the project—as "Isolated Wetlands" that must be protected along with a 50-foot buffer, consistent with Section 143.0141[b] of the City's Environmentally Sensitive Lands Regulations:

Isolated Wetlands (Features Q and R)

Features Q and R refer to two man-made, earthen ponds that are situated near the southeast corner of the golf course at two former playing holes (Figure 2m). While a culvert exists connecting these two features to each other, there is no visible outlet to convey flows off site to downstream tributaries. Therefore, Features Q and R are considered to be isolated, artificially constructed wetlands. Historical imagery suggests that Feature Q was constructed as part of the initial golf course development in the late 1980s, while Feature R was constructed sometime between 1996 and 2002 as part of continued golf course modifications/improvements (HELIX 2018). Feature Q is dominated by a combination of freshwater emergent wetlands and disturbed southern willow scrub vegetation. Feature R is dominated

05-3-10 The comment restates portions of the Appendix E of the Biology Report. The comment does not raise an issue with the adequacy of the EIR and therefore not further response is provided. Refer to **Response to Comment 05-3-11** for a discussion of the man-made features within the project site.

O5-3-9
Cont.

O5-3-10

solely by southern willow scrub vegetation. These features are considered City wetlands due to the dominance of wetland vegetation.

The jurisdictional delineation makes no mention of man-made ponds similar to Features Q and R that are located in areas proposed for grading. Mr. Bailey and I checked the larger of these, which covers approximately 0.7 acre and is located 250 feet north-west of the intersection of Ted Williams Parkway and Highland Ranch Road. We observed that the pond did not have an intact artificial lining, and that its soils consisted of deeply cracked, heavy clay. Roughly the northeastern third of the pond supported a dense stand of native Southern Cattail (*Typha domingensis*), an obligate wetland species, and we heard Baja California Treefrogs vocalizing from the wetland vegetation. The rest of the pond supported a sparse growth of non-native Salt Cedar (*Tamarix ramosissima*), a species that can occur in both wetlands and uplands. See Figure 2, below, and Photos 1 and 2, on the next page.

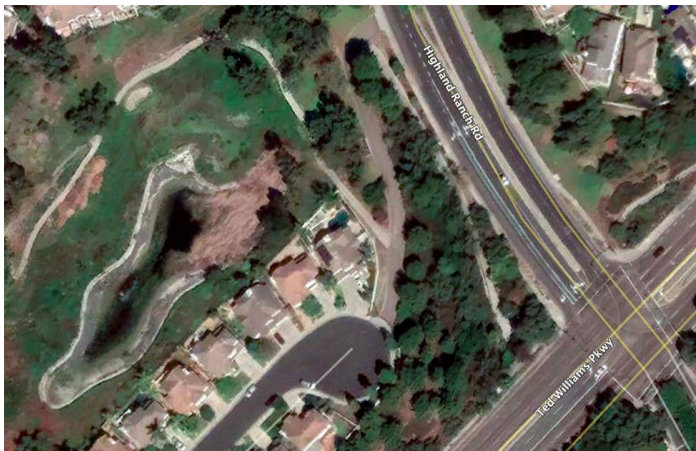


Figure 2. Aerial image, dated March 29, 2020, showing an old golf course pond that appears to satisfy conditions of an “isolated wetland” and “water of the State.” Aerial source: Google Earth Pro.

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O5-3-11

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O5-3-11

Per the City’s Biology Guidelines, the City does not typically regulate artificially created wetlands in historically non-wetland areas. Specifically, the guidelines state: “Areas that contain wetland vegetation, soils or hydrology created by human activities in historically non-wetland areas do not qualify as wetlands under this definition unless they have been delineated as wetlands by the Army Corps of Engineers, and/or the California Department of Fish and Wildlife”.

Based on review of historic aerials, the features in question were excavated from historic uplands; golf course irrigation serves as the main source of water for these ponds. Wetland vegetation and hydrology exist as a result of human activities in historically non-wetland areas and therefore these ponds do not qualify as City wetlands. The Final EIR has been revised to identify the two features described in the comment letter as “Feature S and Feature T”. In addition, the Final EIR has been revised to remove Features Q and R from the list of regulated wetlands.

These features (Q, R, S and T) would not be considered jurisdictional by the Regional Water Quality Control Board as they artificial features which were created to contain site runoff created from golf course irrigation. The artificial feature is less than an acre in size and thus is not a “water of the state” per the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. The U.S. Army Corps of Engineers does not regulate artificially created ponds excavated in uplands per the Navigable

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Photo 1. View, facing east, showing a dense stand of Southern Cattail in the northern third of the old golf course pond located northwest of the intersection of Ted Williams Parkway and Highland Ranch Road. Low-growing Salt Cedar is in the foreground, and cracked clay soils are visible in the mid-ground.
Photo: Robert A. Hamilton, January 22, 2021.



Photo 2. View, facing northeast, showing the southwestern end of the same pond. A shrub of Mulefat (*Baccharis salicifolia*) is in the foreground and low-growing Salt Cedar is in the foreground. The stand of Southern Cattail is in the background.
Photo: Robert A. Hamilton, January 22, 2021.

O5-3-11
Cont.

Waters Protection Rule, and the California Department of Fish and Wildlife does not regulate artificially created features. The Biology Report and the Final EIR Section 5.4.1 have been revised accordingly.

O5-3-12 Refer to **Response to Comment O5-3-11.**

The DEIR identifies Features Q and R as requiring protection as “isolated wetlands,” yet makes no mention of this earthen pond, which is larger than those features and which supports a dense stand of obligate wetland vegetation. This pond must be evaluated as part of a credible jurisdictional delineation, because some or all of the pond may require protection—along with a minimum 50-foot buffer—under applicable State regulations and Section 143.0141[b] of the City’s Environmentally Sensitive Lands Regulations.

O5-3-12

Figure 2H in the DEIR's Biological Resources Technical Report, reproduced below, shows another old golf course pond that was not evaluated as part of the jurisdictional delineation. We did not visit this pond during our field visit, and do not know its current condition, but this old pond should also be evaluated as part of a credible jurisdictional delineation and protected, if warranted.



O5-3-13

O5-3-13 This feature was an artificially created pond. Refer to and, per the discussion in Response to Comment O5-3-11.

O5-3-14 Because the proposed project was specifically designed to place development in previously developed areas, focused surveys were not required by the City. Refer to **Response to Comment O5-3-3.**

O5-3-15 The CNDDDB RareFind application and United States Fish and Wildlife Service (USFWS) occurrence data is reviewed and vetted by those agencies before occurrence data is reported to database subscribers. Therefore, to maintain data integrity the resources used in this report were limited to agency and expert sources: CDFW California Natural Diversity Database – RareFind, Version 5 (CDFW 2020), USFWS Species Occurrence Data (USFWS 2019), and San Diego Natural History Museum (SDNHM 2012).

Wildlife Surveys Inadequate; Species Information Grossly Inaccurate

Just as no spring surveys were conducted for special-status plants, no focused surveys were conducted for special-status wildlife species, despite incidental observation of one listed species, the federally threatened Coastal California Gnatcatcher, and potential for numerous other special-status species to occur. As a result, the DEIR lacks adequate survey data to report upon the status of many wildlife species on the project site.

Furthermore, the project biologists failed to access the standard online databases, such as eBird (www.ebird.org) and iNaturalist (www.inaturalist.org), that have become the

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O5-3-15

most important sources of recent information on the status and distribution of plants and wildlife in a given area.

As a result of the project biologists' deficient approach to documenting the status of special-status wildlife species on the project site and in the surrounding area, and because the project biologists express misapprehensions about the habitat requirements of certain species, the DEIR provides erroneous and misleading information about many special-status species that have potential to occur on the project site. See, for example, the DEIR's accounts of the following species.

Southwestern Pond Turtle: This turtle is a California Species of Special Concern. Page D-1 of the Biological Resources Technical Report mischaracterizes this species' status on the project site and vicinity as follows:

Not expected to occur. While wetland habitat on site may be suitable habitat and there are known occurrences of this species within the region [eight USGS quadrangles surrounding the Poway quadrangle], there are no known occurrences of this species within the vicinity [Poway USGS quadrangle]. In addition, the available habitat is largely isolated from other existing habitat.

This information is incorrect. The US Geological Survey (USGS) has post-2000 records of Southwestern Pond Turtles from multiple locations within the Poway USGS quadrangle, within 1.5 miles of the project site, at both Los Peñasquitos Canyon to the south and Lusardi Creek to the northwest (Christopher Brown, USGS, email dated February 2, 2021. See Figure 3, below.

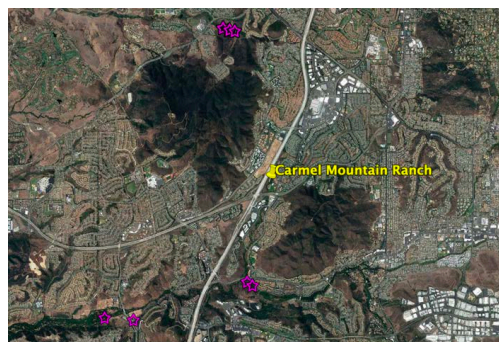


Figure 3. Locations where Southwestern Pond Turtles have been recorded within 1.5 miles of the project site since 2000 (USGS data). Aerial source: Google Earth Pro.

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O5-3-17

O5-3-16 Refer to **Responses to Comments O5-3-17** through **O5-3-27**.

O5-3-17 There is a connected drainage that continues south of the pond but terminates at the north end of Peñasquitos Drive. Any potential landscape connection is lost at this point between this location and the project site. The other two locations are within Peñasquitos Creek which Chicarita Creek connects to but would have to travel more than 1.5 miles and through 4 culverts under major roads to get on site. Therefore, the project site is not likely to support a population of this species. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project.

Photo 3, below, shows the habitat conditions along Chicarita Creek, on the western side of the project site, which are suitable for such species as the Southwestern Pond Turtle, Two-striped Garter Snake, and San Diego Ringneck Snake.



Photo 3. View, facing south, along Chicarita Creek in the southwestern portion of the project site. The habitat along this creek appears to be suitable for various special-status species, including the Southwestern Pond Turtle. The adjacent uplands appear to be suitable for egg-laying by turtles. Photo: Robert A. Hamilton, January 22, 2021.

O5-3-17
Cont.

San Diego Ringneck Snake: This small snake is a California Species of Special Concern. Page D-3 of the Biological Resources Technical Report mischaracterizes this species' status on the project site and vicinity as follows:

Not expected to occur. No suitable wet meadow on site. While this species is known to occur within the region [eight USGS quadrangles surrounding the Poway quadrangle], there are no known occurrences within the vicinity [Poway USGS quadrangle].

This information is incorrect. The project site contains suitable habitat for this species, along Chicarita Creek and the unnamed north-south-trending tributary to Los Peñasquitos Creek in the eastern part of the site, in coastal sage scrub on the site, and possibly in other areas. Furthermore, iNaturalist contains two recent records from Poway, within two miles of the project site

(<https://www.inaturalist.org/observations/39392515> and <https://www.inaturalist.org/observations/39392552>).

O5-3-18

O5-3-18 While San Diego ringneck snake was recorded in iNaturalist in February 2020, as discussed in **Response to Comment O5-3-15**, the biological analysis for this project did not utilize this resource. Further, the iNaturalist recorded occurrences were in eastern Poway and lack any landscape connection to the site. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project.

Coronado Skink: This reptile is a California Special Animal. Page D-3 of the Biological Resources Technical Report mischaracterizes this species' status on the project site and vicinity as follows:

Low potential to occur. No suitable woodland present. There are occurrences recorded within the vicinity [Poway USGS quadrangle].

The project site contains suitable habitat for this species, along Chicarita Creek and the unnamed north-south-trending tributary to Los Peñasquitos Creek in the eastern part of the site, in coastal sage scrub on the site, and possibly in other areas. Furthermore, iNaturalist contains a recent record from within a few hundred of the project site (<https://www.inaturalist.org/observations/28326999>).

Two-striped Garter Snake: This aquatic snake is a California Species of Special Concern. Page D-4 of the Biological Resources Technical Report mischaracterizes this species' status on the project site and vicinity as follows:

Low potential to occur. Natural habitat on the site is limited and is often surrounded by development. The species has been recorded in the vicinity [Poway USGS quadrangle].

This information is incorrect. The project site contains highly suitable habitat for this species, along Chicarita Creek and the unnamed north-south-trending tributary to Los Peñasquitos Creek in the eastern part of the site. In fact, iNaturalist contains two recent records of Two-striped Garter Snakes from on the site, or immediately adjacent to the site (<https://www.inaturalist.org/observations/21034004> and <https://www.inaturalist.org/observations/1217789>).

Northern Harrier: This raptor is a California Species of Special Concern. Page D-6 of the Biological Resources Technical Report mischaracterizes this species' status on the project site and vicinity as follows:

Not expected to occur. The site is outside of the species' known geographic range and there is no suitable vegetation present. No known occurrences within the region [eight USGS quadrangles surrounding the Poway quadrangle] and vicinity [Poway USGS quadrangle].

This information is incorrect. Poway is well within the geographic range of the Northern Harrier, and eBird contains numerous records from within a few miles of the project site.

05-3-19 Due to the recent observations of Coronado skink, the Final EIR and Biology Report have been corrected to state that this species has a moderate potential to occur within the riparian woodland along Chicarita Creek. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project. .

05-3-20 Due to the recent observations of this two-striped garter-snake, the Biological Report and Final EIR have been revised to state that this species has a moderate potential to occur within the riparian woodland along Chicarita Creek. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project.

05-3-21 The summary table provided in Appendix D of the Biology Report has been revised to remove the statement that the site is located outside of the known geographical range of northern harrier. However, due to the location of the project site (i.e., surrounded by development), there is a low potential for northern harrier to occur within the project site, and no potential for impacts to this species.

White-tailed Kite: This raptor is a California Fully Protected Species. Page D-7 of the Biological Resources Technical Report mischaracterizes this species' status in the project vicinity as follows:

While this species is known to occur within the region [eight USGS quadrangles surrounding the Poway quadrangle], there are no known occurrences in the vicinity [Poway USGS quadrangle].

This information is incorrect, as eBird contains numerous records of White-tailed Kites from within the Poway USGS quadrangle and elsewhere in the vicinity of the project site.

O5-3-22

Yellow-breasted Chat: This songbird is a California Species of Special Concern. Page D-8 of the Biological Resources Technical Report mischaracterizes this species' status in the project vicinity as follows:

Not expected to occur. Riparian habitat on the site is likely not expansive enough to support this species. While this species is known to occur within the region [eight USGS quadrangles surrounding the Poway quadrangle], there are no known occurrences in the vicinity [Poway USGS quadrangle].

This information is incorrect, as eBird contains numerous records of Yellow-breasted Chats from within the Poway USGS quadrangle and elsewhere in the vicinity of the project site.

O5-3-23

Least Bittern: This marsh bird is a California Species of Special Concern. Page D-9 of the Biological Resources Technical Report mischaracterizes this species' status in the project vicinity as follows:

Not expected to occur. No suitable freshwater habitat present. While this species is known to occur within the region [eight USGS quadrangles surrounding the Poway quadrangle], there are no known occurrences in the vicinity [Poway USGS quadrangle].

This information is incorrect. First, eBird contains numerous records of Least Bitterns from within the Poway USGS quadrangle and elsewhere in the vicinity of the project site. Three were recorded at a likely breeding site known as Poway Pond, two miles southeast of the project site, on May 5, 2019 (<https://ebird.org/checklist/S55884641>). Also, fairly extensive freshwater marsh habitat in the uppermost part of Chicarita Creek appears to be potentially suitable for use by Least Bitterns (see Photo 4 on the next page).

O5-3-24

O5-3-22 Refer to **Response to Comment O5-3-15** regarding reliance on eBird. The Biological Report states that white-tailed kite has a moderate potential to occur and this species was included in the biological analysis.

5-3-23 Refer to **Response to Comment O5-3-15**, regarding reliance on eBird. Regardless, the Biology Report has been revised to include this yellow-breasted chat as having a moderate potential to occur within the riparian woodland along Chicarita Creek. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project.

O5-3-24 The freshwater marsh habitat within the project area is small, isolated and surrounded by development pressure and the I-15 and thus least bittern is not expected to utilize any available habitat within the project area.



Photo 4. View, facing northeast, of the uppermost part of Chicarita Creek, where fairly extensive freshwater marsh vegetation exists. The dense emergent wetland habitat in this part of the project site appears to be potentially suitable for Least Bitterns, and the palms provide suitable roosting habitat for bats, especially the Yellow Bat. *Photo: Robert A. Hamilton, January 22, 2021.*

O5-3-24
Cont.

O5-3-25 Refer to **Response to Comment O5-3-15**, regarding reliance on eBird. The potential to occur for western bluebird has been revised in the Final EIR and Biology Report to clarify that suitable foraging habitat is present within Chicarita Creek but the species ~~that~~ it is not expected to nest in the area due to lack of suitable nesting habitat. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project.

Western Bluebird: This songbird is a covered species under the MSCP. Page D-11 of the Biological Resources Technical Report mischaracterizes this species' status in the project vicinity as follows:

Not expected to occur. No suitable habitat on site. No known occurrences within the region [eight USGS quadrangles surrounding the Poway quadrangle] and vicinity [Poway USGS quadrangle].

This information is incorrect, as the Western Bluebird is a common resident in the Poway area, with numerous eBird from within the Poway USGS quadrangle and elsewhere in the vicinity. Mr. Bailey and I observed three Western Bluebirds on the project site during the field visit (<https://ebird.org/checklist/S80045749>).

O5-3-25

Least Bell's Vireo: This songbird is listed as endangered by state and federal governments. Page D-11 of the Biological Resources Technical Report mischaracterizes this species' status in the project vicinity as follows:

Moderate potential to occur. This species would be most likely to occur within the riparian habitat along Chicarita Creek. There are occurrences recorded within the vicinity [Poway quadrangle], however, there are no known occurrences within 5 miles of the site.

This information is incorrect, as eBird lists a record of a singing male from the Peñasquitos Creek Trail on June 12, 2020 (<https://ebird.org/checklist/S70366958>) and numerous records from near Lake Hodges and the San Dieguito River, within five miles of the project site.

Western Yellow Bat: This bat, which preferentially roosts in the dead fronds of palm trees^{5,6}, is a California Species of Special Concern. Page D-14 of the Biological Resources Technical Report mischaracterizes this species' status in the project vicinity as follows:

Not expected to occur. No suitable habitat present. There are occurrences recorded within the vicinity [Poway USGS quadrangle].

Contrary to the DEIR's conclusion, Photo 4 on the previous page shows a stand of mature fan palms, surrounding an area of freshwater marsh, with full skirts of dead fronds that Western Yellow Bats would find attractive as roosting sites. Since Dudek did not conduct any surveys for special-status bat species, the DEIR has no basis for its conclusion that this bat is "Not expected to occur" in habitat that appears ideal for its occurrence. In the absence of any data from a focused bat survey, this species should be assumed present in palms on the project site.

IMPACT ANALYSIS IS FLAWED AND REQUIRES REVISION

As discussed in these comments, the project biologists conducted no spring surveys for special-status plants, no focused surveys for special-status wildlife species, their jurisdictional delineation failed to evaluate all apparent wetland areas on the site, and they failed to report the best available information on the known status, distribution, and habitat requirements of special-status plants and wildlife. As a result, the DEIR's impact analysis fails to adequately or accurately characterize the proposed project's potential impacts upon jurisdictional wetlands, and upon various special-status plant and wildlife species.

⁵ Kurta, A. and G.C. Lehr. 1995. *Lasiurus ega*. Mammalian Species 1-7.

⁶ Mirowsky, K. 1997. Bats in palms: precarious habitat. Bats 15:1-6.

05-3-26 Refer to **Response to Comment 05-3-15**, regarding reliance on eBird. The draft EIR states that this species has a moderate potential to occur within the project site and appropriate mitigation measures are provided (MM-BIO-1).

05-3-27 The Final EIR and Biological Report have been revised to include western yellow bat as having a moderate potential to occur within the palm trees located in the very northern location of Chicarita Creek. The revised potential for this species to occur within the project area would not change the impacts anticipated from the project. All of the palm trees documented by the commentor are included in the polygon mapped as southern cottonwood-willow riparian forest which is considered a City wetland. No development or brush management are allowed within City wetlands and therefore direct impacts to this habitat would be avoided. Noise from brush management zone thinning is not expected to exceed the ambient noise from Interstate 15 directly to the west. Thus, indirect noise impacts to bats with a moderate potential to occur are not anticipated. This activity is not expected to result in any impacts to western yellow bats should they occur within the palm trees.

05-3-28 Refer to **Response to Comments 05-3-3** and **05-3-6** regarding focused surveys; **Response to Comment 05-3-10**, **05-3-11** and **05-3-13** regarding the jurisdictional delineation and **Responses to Comments 05-3-17** through **05-3-27** regarding the potential for special-status plant and wildlife to occur within the project site.

Potential Wetland Impacts Not Identified

The proposed actions include grading of two old golf course ponds that were not evaluated as potential "Isolated Wetlands" that may require protection, along with a 50-foot buffer, to comply with Section 143.0141[b] of the City's Environmentally Sensitive Lands Regulations (see pages 10-11 of this letter). A qualified specialist must evaluate these potential wetlands and, if necessary, revise the jurisdictional delineation and project plans to avoid impacts to any areas that satisfy the City's definition of a wetland.

Proposed Landscaping and/or Brush Management Could Impact Special-Status Plants and Wildlife

The project proposes to "replace dead and dying vegetation associated with the vacant and blighted golf course with drought-tolerant, native landscaping." The term "native landscaping" is not defined, and in many parts of the DEIR the phrase "naturalized landscaping" is used in its place. To minimize the project's adverse effects on native plant communities, and the native plant and wildlife species reliant upon those communities, the "native landscaping" used in the more natural portions of the project site—especially in the area along Chicarita Creek where special-status plants are known to occur—should be limited to appropriate, *locally native* plant species suitable for use in fuel modification zones.

The project also proposed ongoing brush management of existing vegetation outside of a narrowly defined riparian zone along Chicarita Creek. The "Zone 2" brush management treatment specifies ongoing thinning of 50 percent of shrubs and herbaceous plants, including within existing stands of coastal sage scrub. In some places, brush management would encompass the entire wetland buffer.

The DEIR concludes that thinning coastal sage scrub vegetation would be "impact neutral," meaning that any negative effects of repeatedly disturbing this area by removing half of its vegetation, in perpetuity, would be outweighed by positive effects of removing non-native weeds and planting "naturalized landscaping." The problem with this impact analysis is that the project biologists lack sufficient information to determine that these actions would truly be "impact negative," and the term "naturalized landscaping" is undefined and suggests that species not native to the area would be planted.

See, for example, the palms shown in Photo 4 (page 17 of this letter). As discussed previously, the project biologists have conducted no focused bat surveys to provide adequate information on the status of Western Yellow Bats, or various other special-status bat species, on the site. Since the extensive skirts of dead fronds on these palms constitute prime roosting habitat for Western Yellow Bats, the species should be presumed present in the absence of data demonstrating otherwise. Page 31 of the Biological Resources Technical Report states:

Removal/control of non-native plants is not considered to constitute a significant habitat impact for which compensatory habitat acquisition, preservation, or creation for the area

- 05-3-29** Refer to **Response to Comment 05-3-11** and **05-3-13**. These two graded golf course ponds would not be considered City wetlands; no impacts to City wetlands are anticipated.
- 05-3-30** Regarding the Draft EIR's use of the terms "native landscaping" and "naturalized landscaping," the landscaping plan proposed for the project would utilize a locally indigenous plant palette. The proposed landscape planting plan and revegetation activities would occur in disturbed areas and graded areas that lie within the former golf course fairways, and existing naturalized slopes would be preserved. The use of the term "naturalized landscaping" has been revised within the Final EIR to state "locally-indigenous landscaping."
- 05-3-31** Comment noted.
- 05-3-32** Refer to **Response to Comment 05-3-3** regarding lack of sufficient information. Refer to **Response to Comment 05-3-30** for clarification on the term "naturalized".
- 05-3-33** Refer to **Response to Comment 05-3-27**.
- 05-3-34** Wetlands are being avoided as is described throughout the Biology Report and Draft EIR. The palms shown in Photo 4 of the comment letter occur within an area delineated as City wetlands and therefore would not be impacted by the project. The quotation included in the comment is from the City's Biology Guidelines and is not relevant to the proposed project. No fan palms will be removed, see

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impacted is required. Mitigation for indirect impacts such as erosion control or off-site infestation by non-native species may be needed. Examples include disturbed wetlands dominated by invasive plant species such as giant reed or Mexican fan palm.

This statement suggests that the palms shown in Photo 4 would likely be removed as part of the project. The removal of habitat presumed to be occupied by special-status bats would represent a potentially significant impact to that species from (a) deaths of individual bats during tree removal and/or (b) loss of prime roosting habitat. If this takes place, CEQA requires that the EIR preparer identify feasible mitigation to reduce the impact to below a level of significance.

Due to inadequate botanical surveys, the project biologists lack information upon which to base their conclusion that proposed vegetation thinning would be "impact neutral." For example, Hamilton Biological found a population of at least ten plants of California Adolphia (*Adolphia californica*) growing along Chicarita Creek, in an area that would be subject to Zone 2 thinning. Photo 5, below, shows the appearance of this rare plant.



Photo 5. Showing California Adolphia (*Adolphia californica*) on the project site, near Chicarita Creek. The project biologists did not observe this special-status plant species, and it is likely that this spinescent and half-dead shrub would be removed as part of the 50% thinning of this area, a potentially significant impact not identified in the DEIR. Photo: Robert A. Hamilton, January 22, 2021.

Response to Comment O5-3-27.

O5-3-35 Refer to **Response to Comment O5-3-3.**

O5-3-34
Cont.

O5-3-35

Review of Biological Issues, Trails at Carmel Mountain Ranch DEIR
February 8, 2021

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Page 21 of 21

Once adequate botanical surveys are conducted across the entire project site, all locations of special-status plant species should be mapped and designated as off-limits to brush management. Biological monitors working with the brush management crews should be aware of the locations of all special-status plants and should flag off those areas prior to any brush management activities. If these steps are not taken, it is very likely that brush management activities will impact populations of rare plants that occur along Chicarita Creek, and possibly in other parts of the project site.

SUMMARY AND CONCLUSION

For reasons detailed herein, the DEIR fails to comply with the City's Biology Guidelines and is grossly deficient and misleading as a CEQA document. The City should require the EIR preparer to (1) conduct adequate biological surveys, (2) complete a jurisdictional delineation that evaluates all potential wetlands, and (3) search for relevant information available on the local status and distribution of special-status species available online and through the US Geological Survey, and use this information to accurately characterize the likely status of special-status species on the project site.

The DEIR simply asserts that project activities will be "impact neutral" without actually describing, defining, and analyzing the impacts. This letter has identified various potentially significant impacts (e.g., possible removal of rare plant populations and habitat features used by special-status wildlife species). All potentially significant impacts must be identified in the CEQA document and appropriate mitigation measures identified.

Once adequate information has been compiled, the City should direct preparation of a credible CEQA analysis that incorporates all relevant biological information and that satisfies all elements in the City's Biology Guidelines. The City should then recirculate the adequate CEQA document for public review. Recirculation is required because the current DEIR does not provide the basic information that the public, resource agencies, and decision-makers require in order to evaluate the effects of the proposed project on sensitive biological resources.

Please call me at 562-477-2181 if you have questions or wish to further discuss any matters; you may send e-mail to robb@hamiltonbiological.com.

Sincerely,



Robert A. Hamilton, President
Hamilton Biological, Inc.
<http://hamiltonbiological.com>

cc: Eric Weiss, California Department of Fish and Wildlife
David Zoutendyk, US Fish and Wildlife Service

O5-3-35
Cont.

O5-3-36

O5-3-37

O5-3-38

O5-3-39

O5-3-36 Refer to **Response to Comment O5-3-3** and **O5-3-6** regarding focused surveys; refer to **Response to Comment O5-3-10** and **O5-3-11** regarding the jurisdictional delineation that was conducted; and refer to **Responses to Comment O5-3-15** regarding the potential for special-status plant and wildlife to occur within the project site.

O5-3-37 Refer to **Response to Comment O5-3-3** and **O5-3-27**.

O5-3-38 Section 15088.5 of the CEQA Guidelines provides the regulatory framework for when an EIR must be recirculated prior to certification. The Draft EIR need not be recirculated Recirculation is not required because no new significant information has been presented and added to the Draft EIR as a result of the public review period, such as a new significant environmental impacts or mitigation measures. The revisions to the Draft EIR included in the Final EIR provide clarification, thus, recirculation is not required. Refer to **Response to Comment O1-66**.

O5-3-39 The comment provides contact information for the commentor. The comment does not raise any specific issues relating to the adequacy of the analyses contained within the Draft EIR, and no further response is required.



Comment Letter O5-4

traffic engineering & design
transportation planning
parking
acoustical engineering
air quality & ghg

February 5, 2021

Mr. Everett DeLano, Esq.
DELANO & DELANO
104 W. Grand Avenue, Suite A
Escondido, CA 92025

Subject: Trails at Carmel Mountain Ranch Draft EIR Noise Review, City of San Diego

Dear Mr. DeLano:

Introduction

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental noise impacts identified in the Trails at Carmel Mountain Ranch Draft Environmental Impact Report, December 2020 (hereinafter referred to as DEIR).

According to the DEIR, the project proposes to redevelop the closed Carmel Mountain Ranch Country Club and associated 18-hole golf course with a total of 1,200 multi-family homes and a mix of open space and recreational uses. The project also proposes a future development of community commercial amenities that would include an art studio and a café/restaurant/banquet area. The proposed project is located within the Carmel Mountain Ranch Community and City of San Diego.

The purpose of this letter is to review the DEIR from a noise impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

RK is located in Newport Beach, California and specializes in environmental planning for governmental agencies, private sector businesses, and community groups. The firm principals have over 70 years of combined engineering and planning experience throughout Southern California. RK has prepared hundreds of noise impact studies, and we are fully aware of the complexity of data gathering, modeling, and the possibility for error within these technical documents.

O5-4-1

Response to Comment Letter Enclosure O5-4, Estrada

O5-4-1 The comment is an introduction to the comments that follow.

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Comments

The following comments are offered with respect to the analysis of potential noise impacts described in the DEIR:

1. Section 5.11.1, Existing Conditions. The DEIR provides a very narrow assessment of existing ambient noise conditions by only measuring noise levels for 10- or 15-minute periods during morning hours, between 10 am and noon, on one weekday. The proposed project consists of uses that will generate noise 24-hours a day, 7 days a week (i.e. parking lot noise, mechanical equipment, outdoor social activities, etc.). Therefore, the DEIR should identify the existing ambient environment during all hours of the day when the project has the potential to generate noise.

O5-4-2

2. Section 5.11.3, Short-term Construction Noise Impact Analysis. Page 5.11-9 of the DEIR concludes that “the majority of construction operations associated with the proposed project would exceed the City’s 75 dBA 12-hour average property line noise level threshold”. However, the DEIR has not adequately demonstrated how mitigation measure MM-NOI-1 will effectively reduce the impact to less than significant levels. According to Table 5.11-6, construction noise levels will need to be reduced by more than 10 dBA, and in cases where construction noise occurs closer than 50-feet, noise levels will need to be reduced even further. Page 5.11-20 mentions potential noise reductions may be achieved from barriers and enclosures, but MM-NOI-1 only requires barriers around impact tools. Construction noise impacts will be caused by more than just impact tools. As identified in Table 5.11-5, there are many different types of construction equipment that will generate noise in excess of 75 dBA. Therefore, given the close proximity of the project site to adjacent residential homes, the following mitigation measure should be required:

O5-4-3

- Install temporary noise barriers around all active construction sites. Noise barriers should be at least 8-feet high and installed at the first phase of construction, prior to performing any demolition, excavation or grading activities. The noise barrier walls should present a solid face area and include sound absorptive material or blankets which can be installed in multiple layers for improved noise insulation.

Due to the variability of construction activities and the limitation of noise barriers to shield second floor or third floor residential receptors, it is still likely construction



O5-4-2

The short-term measurements conducted served to provide baseline noise exposure across the project area and to calibrate the traffic noise model used for the proposed project. As the noise environment is primarily influenced by traffic noise on local and regional roadway network a reasonably accurate traffic noise model provides a good representation of the noise levels experienced in the area. The traffic noise model was calibrated based on the short-term monitoring results.

O5-4-3

Draft EIR Section 5.11.3, Level of Significance after Mitigation, discusses the potential for the mitigation measures to reduce construction noise levels. Depending on the condition of the construction equipment, the existing environment, and the administrative refinements of the construction operations prior to mitigation, the mitigation measure would be expected to have the potential to provide a reduction ranging from 5 to 13 A-weighted decibels (dBA). The comment references Table 5.11-6 of the Draft EIR, with the ascertain that construction noise levels would need to be reduced by more than 10 dBA. However, Table 5.11-6 construction noise levels are presented at a reference distance of 50 feet, while the average distance to construction operations would range from approximately 105 feet to 185 feet from the existing nearby noise-sensitive receptors. At the closest average effective acoustical distance of 105 feet from the construction operations, the unmitigated construction operations associated with the loudest stage (demolition) would be 78.9 dBA equivalent sound level (L_{eq}). With the construction mitigation providing a reduction ranging from 5 to 13

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noise levels will exceed the threshold of significance near residential property lines. Therefore, the DEIR should provide further mitigation, as follows:

- Implement an active construction noise monitoring program that will report real-time noise levels at residential property lines closest to the active areas of construction. Repeated violations should result in citations and/or revocation of building permit.

3. Section 5.11.3, Residential Mechanical Equipment. Page 5.11-17 of the DEIR states, "Assuming an attenuation rate of 6 dB per doubling of distance and shielding that would break the line of site [sic] to the outdoor HVAC equipment, the noise level at the nearest receiving property line would be approximately 44.5 dBA during continuous operation, exceeding the San Diego Municipal Code residential noise level standard of 40 dBA between 10:00 p.m. and 7:00 a.m.". The result is a potentially significant impact. MM-NOI-2 indicates that the mitigation to alleviate this potential impact is to shield units behind a barrier so that line of sight from the noise source to the property line of the adjacent noise-sensitive receptors is blocked. However, the analysis has already taken barrier shielding into consideration and it was demonstrated that the resulting noise levels would still result in a significant impact. Thus, MM-NOI-2 does not demonstrate how it would further reduce the impact to less than significant levels, but rather defers mitigation to subsequent studies at a later time.

4. Section 5.11.3, On-Site Traffic Noise Compatibility. The DEIR finds that the project will expose future residences living in the Unit 5 development area to excessive noise levels that fall within the "incompatible" limits of the City of San Diego General Plan Noise Element. Per the City's Noise Compatibility Guidelines, Table NE-3, new construction should not be undertaken and severe noise interference making outdoor activities unacceptable would occur for land uses within incompatible areas. The DEIR goes on to make unsubstantiated claims that an earthen berm and intervening buildings would block freeway noise to the future outdoor activity areas. However, the primary areas of concern should be the habitable dwelling units where future residences will live, which based upon this review, would be located approximately 600 feet from the centerline of the I-15 Freeway. The DEIR instead analyzes noise impacts at 850 feet away, thus underestimating noise levels. Furthermore, first row units facing the freeway, and in particular any unit located above ground floor level, will receive very little noise attenuation from the

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O5-4-3
Cont.

O5-4-4

O5-4-5

dBA the noise exposure level at the nearby sensitive receptors would be reduced to approximately 74 dBA L_{eq} . The project would comply with the City of San Diego 75 dBA 12-hour average noise level threshold. Therefore, with ~~incorporate~~ incorporation of mitigation measures, impacts would be below a level of significance.

Mitigation measure MM-NOI-1(F) requires personnel be available to respond in a proactive manner to any project-related construction equipment or operation that may result in excessive noise levels. The existing mitigation measure requires that the disturbance coordinator respond to complaints resulting from project construction noise and "institute(ing) modifications to the construction operations, construction equipment or work plan to ensure compliance with the San Diego Municipal Code standards." These modifications can vary based on the individual situation and may include localized temporary construction noise barriers, modifications to the operations, the use of smaller/quieter equipment, etc. Mitigation measure MM-NOI-1(F) was updated to provide specific noise controls that are anticipated as applicable options. Mitigation measures provided, would reduce impacts to below a level of significance.

O5-4-4

The statement in the Draft EIR (Section 5.11.3) which states that the analysis did not take barrier shielding into account, was a typographical error that has been corrected in the Final EIR in ~~strikeout~~ underline format. The mitigation measure (MM-NOI-2) requiring that the

project meet applicable City of San Diego noise thresholds through equipment selection, project-site design, and construction of localized barriers or parapets is therefore not deferred mitigation.

O5-4-5 A discussion of land use compatibility as it relates to the General Plan Noise Element, is provided in Section 5.1, Land Use, Table 5.1-2 of the Draft EIR.

Unit 5 development would be required to comply with the City's Noise Element and State of California Title 24 interior noise level standard of 45 dBA day-night average sound level (L_{dn}) within any habitable room. As site specific building plans and construction details were not available, an evaluation of the noise reduction capabilities of the building facades associated with the Unit 5 development would be required as a condition of approval. An exterior-to-interior acoustical report would be prepared to ensure that interior levels achieve a 45 dBA level.

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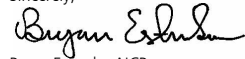
topography. The final EIR should make it clear that residential units are being proposed adjacent to the I-15 freeway in an incompatible area for noise.

5. Section 5.11.3, General Comment. The DEIR does not analyze all potential sources of noise generated by the project, and as a result, noise impacts are under-reported. In particular, parking lot noise associated with internal drive-aisles and on-site circulation, vehicle idling, horn honking, door slamming, loading/unloading activities, trash collection, and truck deliveries are common sources of noise that would occur during both daytime and nighttime hours. These types of noise sources were not evaluated and should be considered within the DEIR as stationary sources of noise that would contribute to the project's overall noise impact.
6. Section 5.11.3, General Comment. The DEIR does not address the City of San Diego CEQA Significance Determination Thresholds, July 2016 initial study checklist question, which, as stated on Page 50 requires that a project be evaluated to determine whether it would result or create a significant increase in the existing ambient noise levels. As stated previously in Comment #1, the DEIR provides a very narrow assessment of existing ambient conditions and only measures noise levels for a short period of time during daytime hours. However, as identified in the DEIR, the project will generate noise levels during both daytime and nighttime hours. Therefore, in addition to comparing stationary noise levels to the allowable noise levels in the noise ordinance, the DEIR should also disclose changes in ambient conditions from the combined impact of all project noise sources. Failing to do so conceals the overall impact of the project, especially during nighttime hours when noise levels are likely much lower than what was measured during the day.

Conclusions

RK appreciates the opportunity to work with the DELANO & DELANO in reviewing the Trails at Carmel Mountain Ranch DEIR. If you have any questions please give call at (949) 474-0809

Sincerely,



Bryan Estrada, AICP
Principal

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↑ O5-4-5
Cont.

O5-4-6

O5-4-7

O5-4-6

Noise sources identified in the comment are discussed qualitatively in the technical report. There are no large-scale commercial/retail/ industrial uses proposed with the project that would result in a significant number of on-site trips, large-scale loading/unloading activities, trash collection or heavy truck deliveries.

O5-4-7

The largest noise source affecting the project vicinity is traffic noise on the local and regional roadway network. The noise analysis evaluates the change in traffic noise levels resulting from the project, as presented in Draft EIR Tables 5.11-8, 5.11-9 and table 5.11-10. The analysis of activities associated with long-term operations of the proposed project would not influence the existing noise environment as shown in Draft EIR Section 5.11.3, long-term operations. As concluded, impacts were determined to be less than significant as it relates to construction noise; and impacts regarding operational noise were determined to be less than significant.

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Comment Letter O5-5

RICHARD R. HORNER, PH.D.

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February 4, 2021

Everett DeLano, Esq.
DeLano & DeLano
220 West Grand Avenue
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Dear Mr. DeLano:

At your request I reviewed documents submitted by the proponent of the Trails at Carmel Mountain Ranch development in the City of San Diego (the City). I focused principally on the proposed stormwater management system and the project's potential effects on the waters receiving its stormwater runoff (Chicarita Creek, Peñasquitos Creek, Peñasquitos Lagoon, and the adjacent Pacific Ocean shoreline). In forming my opinions, I reviewed and assessed a number of sections of the draft Environmental Impact Report (dEIR) and its Appendices E (Drainage Study), J (Geotechnical Report), and S (Stormwater Quality Management Plan, Parts 1 and 2), plus the hydromodification screening report prepared for the project.¹ This letter presents the opinions I reached.

In evaluating the Trails at Carmel Mountain Ranch documents, I applied the experience of my 43 years of work in the stormwater management field and 11 additional years of engineering practice. During this period, I have performed research, taught, and offered consulting services on all aspects of the subject, including investigating the sources of pollutants and other causes of aquatic ecological damage, impacts on organisms in waters receiving urban stormwater drainage, and the full range of methods of avoiding or reducing these impacts. Attachment A to this letter presents a more complete description of my background and experience. My full *curriculum vitae* are available upon request.

I. SUMMARY OF MY OPINIONS

The function of an Environmental Impact Report is to provide all of the information regulators and citizens need to make a full and confident evaluation of the proposal and its potential environmental effects. The Trails at Carmel Mountain Ranch project documents leave out details needed for this purpose. The final EIR should fill these gaps and also reevaluate some features of the selected stormwater management practices, specifically with respect to:

¹ Chang, W.W. 2020. Hydromodification Screening for the Trails at Carmel Mountain Ranch. Chang Consultants, Rancho Santa Fe, California.

Response to Comment Letter Enclosure O5-5, Horner

O5-5-1 The comment is an introduction to the comments that follow.

O5-5-2 Some of the information being requested is not typically provided at this stage in the CEQA process, and some information is not relevant ~~City development regulations and requirements~~. The stormwater information provided in the Draft EIR is adequate from a CEQA perspective.

O5-5-1

O5-5-2

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Page 2

- Going well beyond statements in the dEIR to the effect that applicable regulations will be followed and actually demonstrating that there will be no adverse impacts in the short-term construction and long-term operation phases of the project; O5-5-2a
- Documenting any site conditions creating challenges for managing construction stormwater runoff and committing to a robust construction-phase stormwater management program prioritizing practices that avoid or greatly minimize soil loss or other pollutant releases; O5-5-2b
- Performing water quality modeling to produce a quantitative accounting of pollutant mass loadings pre- and post-development and cumulatively within the watershed; O5-5-2c
- Substantially upgrading the coverage of proposed pollutant source control practices to display where and how each practice will be utilized; O5-5-2d
- Performing infiltration testing at each prospective biofiltration basin site to determine if local conditions will allow effective infiltration, even in the face of discouraging indications in the general soils data, since infiltrating biofiltration is superior for both water quality and hydromodification control compared to the proposed underdrained configuration; O5-5-2e
- Clearing up the confusion existing in the dEIR and its appendices on the questions whether or not the full hydromodification analysis has been done for all biofiltration basins and what soil column depths were assumed for the analysis; and O5-5-2f
- Employing 2020 County of San Diego BMP Design Manual recommendations to specify: (1) deeper biofiltration basin soil columns for improved water quality treatment, (2) nutrient sensitive media design to alleviate nitrogen transport to the receiving water impaired for that pollutant, and (3) flow spreading features to promote even flow distribution. O5-5-2g

The remainder of my letter elaborates on these points.

II. INSUFFICIENT DETAIL FOR FINAL DECISION-MAKING

A. The dEIR's Deficiencies

The Notice of Availability of the dEIR issued by the City requests comments regarding the adequacy of the document to be included in the final EIR that will be considered by the decision-making authorities. In my opinion, the dEIR is inadequate in several respects under my purview as a basis for final decision making.

The dEIR's section 5.18 (Water Quality) is a key reference point for my considerations. It covers both short-term construction and long-term operation impacts on the receiving waters of stormwater runoff from the project. However, in both cases it merely relies on statements to

O5-5-3

O5-5-2a Further detail will be provided during final engineering on both short-term impacts through development of a project-specific stormwater pollution prevention plan (SWPPP), and long-term impacts through updates to the project-specific stormwater quality management plan (SWQMP), to be submitted to the City for review prior to grading permit issuance.

O5-5-2b The project will be subject to the California Construction General permit (CGP) and will develop a project-specific SWPPP during final engineering. The project will implement construction-phase stormwater protection consistent with applicable regulations.

O5-5-2c The project is a Priority Development Project, and is subject to the City Stormwater Standards. The Stormwater Standards require pollutant control Best Management Practices (BMPs), which are designed to reduce pollutants from stormwater. The Standards do not require a watershed mass loading study. Mass loading studies are more appropriate for a total maximum daily load analysis or research study of larger watershed areas.

O5-5-2d The Draft EIR includes a detailed project description in Section 3.0 of the Draft EIR, which provides for a summary of the proposed land uses and a Conceptual Site Plan. The project also includes Design Guidelines which prescribe the type and form of development to occur. Therefore, sufficiently detailed information has been provided to perform a thorough CEQA analysis. Further detail will be

provided during final engineering on both short-term impacts and long-term impacts through development of a project-specific SWPPP, and will be submitted to the City for review prior to grading permit issuance.

- O5-5-2e** Geocon's Infiltration Feasibility Letter is included in Attachment 1D of the SWQMP, and the letter explains the detailed feasibility considerations they used in developing their geotechnical recommendations. Geocon recommended a no-infiltration condition per the requirements outlined in Appendix C of the City Stormwater Standards. Per those standards, infiltration testing is not a requirement, especially when there are overriding geotechnical hazards which would preclude infiltration.
- O5-5-2f** The City Stormwater Standards dictate minimum soil column depths for biofiltration basins, and the Preliminary SWQMP as a part of the Draft EIR (Appendix S) shows that the sizing of the proposed basins meets the minimum standard. The final soil depths for each basin will be provided in the Final SWQMP prior to grading permit issuance. The final soil depths will be updated in both the water quality and hydromodification modeling to be consistent during final engineering.
- O5-5-2g** To clarify, the project is subject to the City Stormwater Standards, not the County of San Diego BMP Design Manual. The soil mix design and soil depth and any flow spreading features are typically addressed during final engineering, once the site plan is more refined. These recommendations will be considered during final engineering and the final grading plans will show the final BMP basin details.

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February 4, 2021
Page 3

the effect that applicable regulations will be followed; and hence there will be no adverse impacts.

Regarding the construction phase, several statements of this type appear, boiling down to the ultimate conclusion, *“With implementation of a SWPPP² and compliance with applicable water quality requirements, runoff from the project site during construction would not adversely affect surface waters or water quality.”* Similarly for long-term operations, the evaluation of impact significance is not justified beyond the extremely general assertion that, *“Through implementation of project-specific site design, source control, treatment control BMPs,³ Low Impact Development practices, project design measures, related maintenance efforts, and conformance with City storm water standards and associated requirements ... potential pollutant discharge and water quality impacts associated with construction and operation of the project would result in less than significant impacts.”*

Whereas the dEIR and its appendices give no more information on construction-phase stormwater management, Appendices E and S do provide data on the biofiltration basins planned to manage potential hydromodification and water quality impacts of the project. Later in this letter I assess those plans.

However, the documents nowhere actually demonstrate that the intended short-term construction and long-term operation management measures will result in less than significant negative receiving water impacts. There is no guarantee that even the most faithful adherence to specific regulatory points will not aggravate Clean Water Act (CWA) section 303(d) water quality impairments or compromise achievement of a total maximum daily load (TMDL), both of which apply in the Peñasquitos Creek and Lagoon system. The ultimate requirement, according to the San Diego MS4 permit⁴ (at paragraph 2.a), is that, *“Discharges ... must not cause or contribute to the violation of water quality standards in any receiving waters ...”* The final EIR must give full assurance, with justification, that this standard will be attained.

It is entirely feasible to perform a quantitative assessment of the impact potential of a proposed land use modification, and below I outline how. This exercise should be required in the course of preparing the final EIR. Without it, regulators and interested citizens do not have sufficient information for a well-informed judgment of the ability of the proposed management practices to avoid significant impacts.

The dEIR is no more helpful when it turns in section 6.1 to cumulative effects of the Carmel Mountain Ranch project additive to those from other land use changes occurring in the same watershed. Section 6.1.10 asserts, *“... with implementation of storm drain facilities for each related project [referring to other development in the watershed], if applicable, the proposed project would not result in a cumulative impact to hydrology. Therefore, the proposed project’s contribution to a cumulative hydrology impact would not be cumulatively*

² Stormwater pollution prevention plan.

³ Best management practices.

⁴ National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewers Draining the Watersheds within the San Diego Region.

O5-5-3

Refer to **Response to Comment O5-5-2a, O5-5-2b, and O5-9-2c;** this is not required for a CEQA-level determination of impacts. Regarding the “not cumulatively considerable comment”, the CEQA process does not require a detailed cumulative analysis of water quality throughout the watershed, ~~—only CEQA only requires analysis of the project impacts at a cumulative level.~~

O5-5-3
Cont.

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considerable.” Section 6.1.18 sums up in the same vein: “*All cumulative projects would be required to demonstrate compliance with state and local water quality regulations. If projects are not compliant, mitigation measures would be required in order to ensure water quality impacts do not occur. Water quality impacts would not be cumulatively considerable.*”

The characterization of impacts being “not cumulatively considerable” is meaningless in any objective scientific sense. Just as with gauging the potential impacts of the Carmel Mountain Ranch development individually, the cumulative burden can also be analyzed using the same method that I present later.

B. Recommendations for Correcting Deficiencies in the Final EIR

Above I described how, in my opinion, the dEIR fails to provide convincing demonstrations that the short-term construction and long-term operation phases of the Carmel Mountain Ranch development will not cause significant negative receiving water impacts. Here, I outline what I believe to constitute convincing demonstrations and advocate that they be assembled for the final EIR.

1. Construction Phase

a. Importance of Effective Construction-Phase Stormwater Management

It is important that agency and citizen reviewers of the development proposal have confidence that the proponent understands the elevated potential for construction-phase impacts and is capable of managing them well. Construction zones cleared of vegetation and not otherwise stabilized yield much more sediment compared to the original area well covered with plants and to the same area restabilized with vegetative cover following construction. Measurements and estimates using a mathematical model (Revised Universal Soil Loss Equation Version 2, RUSLE2) indicate 30 to more than 1000 times as much soil loss after compared to before clearing, the margin depending on site topographical, geological, and hydrological factors. Therefore, one year of construction with no or inferior erosion controls can release into the environment as much sediment loading as occurred over decades or even centuries before land clearing.

Increased sediment transport into streams and estuaries has numerous ecological consequences, including:

- Covering and seeping into the gravels where fish spawn and eggs develop; in filling the pore spaces, sediments restrict the flow of water carrying dissolved oxygen, resulting in asphyxiation of the young;
- Covering the stones serving as habitat for fish food sources (e.g., insects, algae);
- Filling pools where fish rest and feed;

O5-5-4

As summarized in **Response to Comment O5-2-1b** above, this is not required for a CEQA-level determination of impacts. The Drainage Study identifies existing and proposed drainage patterns, which illustrate where site locations are steep, which would indicate locations that are more challenging for managing stormwater runoff. Construction phasing considerations will also be evaluated as it relates to stormwater challenges. These site conditions will be evaluated during development of the project-specific SWPPP during final engineering. The general recommendations outlined in the letter will be evaluated during development of the project-specific SWPPP.

O5-5-4

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- Reducing visibility, making it harder for fish to find food and avoid predators;
- Reducing light penetration to underwater plants and algae;
- Abrading the soft tissues of fish, especially gills; and
- Transporting other pollutants present in the soil or picked up in transport.

Soils generally contain nutrients such as phosphorus and nitrogen that fertilize plants and algae. These nutrients are transported along with eroded soil. When they enter natural water bodies and raise the amounts of these substances present in the water, they can stimulate increased growths of algae and aquatic plants, a process known as eutrophication. In these circumstances the forms of algae tend to change from single-celled organisms to filamentous forms, which are less desirable for several reasons. They are generally an inferior food source for wildlife; clog water intakes, conveyances, and boat motors; and foul beaches when they wash up on them. When the increased masses of algae die, bacteria decomposing them exert a large demand on the oxygen dissolved in the water and reduce the amount available for fish. It is not unusual for a eutrophic lake or estuary to have little or no oxygen in the colder waters at the bottom and reduced oxygen even near the surface.

Selenium is a naturally occurring element present in various earthen materials, including soils. It is a nutritionally essential element for animals in small amounts but toxic at higher concentrations. Selenium bioaccumulates in the aquatic food chain, and chronic exposure in fish and aquatic invertebrates can cause reproductive impairments (e.g., larval deformity or mortality). The element can also adversely affect juvenile growth and mortality. Selenium is toxic to water fowl and other birds that consume aquatic organisms containing excessive levels of selenium.⁵ While it is fairly well sequestered when soils are intact, it is mobilized with erosion and transported with the sediments.

Additional pollutant generation considerations at a construction site involve the materials used, wastes produced, and vehicles and other equipment and their fueling and maintenance. They can release metals, petroleum products, and synthetic organic chemicals potentially toxic to aquatic life.

Peñasquitos Lagoon is listed under CWA Section 303(d) as impaired for sedimentation and siltation and has a TMDL to address that problem. Peñasquitos Creek is listed for total nitrogen, selenium, and toxicity, among other pollutants, under the same authority. Poorly controlled erosion and toxics associated with construction materials, wastes, and equipment will aggravate those conditions if the Trails at Carmel Mountain Ranch construction site is not very well controlled.

⁵ <https://www.epa.gov/wqc/aquatic-life-criterion-selenium> (accessed February 1, 2021).

O5-5-4
Cont.

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b. Recommended Improvements in the Final EIR

While I recognize that preparing a specific, complete construction-phase stormwater pollution prevention plan may not be productive before final project design, I believe that the proponent should take two steps in that direction for the final EIR: (1) document any site conditions creating challenges for managing construction stormwater runoff, and (2) commit to a robust management program tailored to the conditions identified in the first step. Doing so would provide a convincing demonstration of non-significant construction-phase impacts in my view.

The principal conditions governing erosion and sediment control are construction schedule relative to the climatological pattern, existing land cover, topography, soils erosivity, flow quantities, and drainage pathways. The wide variation in these factors from site-to-site accounts for the broad range in soil loss cited above. The challenges increase when construction is coincident with precipitation, vegetation is non-existent or removed, topography steepens, soils are relatively erosive, and runoff flows are concentrated instead of dispersed. The dEIR and its attachments do not examine these matters in any systematic way related to planning for construction-phase stormwater management. Any such conditions should be identified and given attention in conducting the second recommended step.

For the second step I recommend that the proponent commit to a regime with the goal of release no sediments or other pollutants to receiving waters. I have found that accomplishing or at least coming very close to that goal is possible with a hierarchical approach, selecting first those practices that guarantee no soil loss or other pollutant releases and moving to less effective methods only when the applying the first set cannot fully control the site. Attachment B outlines this approach.

The highest priority for erosion and sediment control in the Appendix B outline is to use construction management practices such as: (1) performing all ground-disturbing work in the dry periods, stabilizing disturbed surfaces, and then working off the ground in wet intervals; (2) greatly limiting the area disturbed at any one time; and (3) self-containing disturbed areas so that they cannot possibly flow out. The latter strategy can be applied at different space and time scales. For example, on the large scale, an entire area can be channeled to a large depression for evaporation and infiltration of runoff. On the small scale, a short slope above a completed curb can drain to a recess below the curb level. On the medium level, soil stockpiles can be placed within a recess sufficient to contain drainage from them. These measures can be established briefly, until an area is stabilized, or for a longer period while extensive work occurs in the contributing drainage area. Appropriate hydrologic analysis is needed to be sure that containment areas are large enough not to drain out during foreseeable conditions.

The second priority practices are means of slope stabilization that are highly effective but do not fully prevent soil loss, such as bonded fiber matrix and straw blanket slope covers. Following in the third priority are ways of recapturing sediments already entrained in runoff. These practices are never 100 percent effective, although active treatments like polymer-assisted filtration and electrocoagulation can come close and have been used extensively in construction

O5-5-5 Refer to **Response to Comment O5-5-4b**.

O5-5-6 Refer to **Response to Comment O5-5-4b**.

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and other applications in the Pacific Northwest. While the first-priority construction management practices are very economical, these treatment techniques do have higher costs.

For pollutants associated with construction materials, wastes, and equipment, the priority practices are source controls that isolate them to the maximum possible extent from contact with rainfall or runoff. They are straightforward techniques like enclosures, covers, and containments for storage, as well as berming to prevent flow into or away from contaminated areas.

I recommend that the final EIR make a general commitment to use the hierarchical approach to construction-phase stormwater management that I have outlined. I further recommend that any particular potential problem areas found in my recommended first step be highlighted and related to particular BMPs from the hierarchy intended to be used to manage them.

2. Long-Term Operation Phase

a. Importance of Effective Operation-Phase Stormwater Management

Peñasquitos Creek has CWA section 303(d) impairment listings for total dissolved solids and the bacteria indicators enterococcus and fecal coliforms, in addition to total nitrogen, selenium, and toxicity. As pointed out earlier, Peñasquitos Lagoon has an impairment listing and a TMDL for sedimentation and siltation. Stormwater runoff from urban developments is associated with all of these water quality problems, as well as others in the categories of metals, petroleum products, pesticides and other synthetic organic chemicals, and oxygen-demanding substances. The Trails at Carmel Mountain Ranch will have more human presence and activity and higher vehicular traffic than the preceding golf course land use. Accordingly, it presents the potential to release more types of pollutants and larger quantities of most of them than in the golf course state.

A true impact assessment would make a quantitative accounting of the mass loadings of key pollutants, particularly for those responsible for 303(d) listings and the TMDL, for the finished development in comparison to the pre-existing land use. It would extend that analysis to the cumulative pollutant loading burdens associated all land use changes occurring or expected in the Peñasquitos Creek and Lagoon watershed.

b. Recommended Improvements in the Final EIR

In my opinion, a convincing demonstration of non-significant long-term operation-phase impact would be water quality modeling to produce the quantitative account of pollutant mass loadings pre- and post-development and cumulatively within the watershed. Water quality modeling is well developed and routine; and numerous models, at varying levels of complexity and capability, are available in the public domain.⁶ The relatively sophisticated models most

⁶ See, for example, https://stormwater.pca.state.mn.us/index.php/Available_stormwater_models_and_selecting_a_model (accessed February 1, 2021)

O5-5-7 As summarized in **Response to Comment O5-5-2c** above, mass loading modeling is not required for a CEQA-level determination of impacts. Nor is it required per the City Stormwater Standards.

O5-5-8 Refer to **Response to Comment O5-5-7**.

O5-5-7

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used in Southern California are SWMM (Storm Water Management Model) and LSPC (Loading Simulation Program in C++) for modeling pollutant generation and transport and SUSTAIN (System for Urban Stormwater Treatment and Analysis Integration) for BMP performance.

At the other end of the scale, relatively simple spreadsheet models taken from the general marketplace or user-developed can be employed productively to evaluate relative pollutant loadings with different land use scenarios. These models divide the site into drainage subcatchments, each representing a land surface with pollutant sources, and a BMP to collect and treat its stormwater runoff. This step has already been completed for Carmel Mountain Ranch. Pollutant mass loadings (e.g., kg/year) associated with the land use are found from the voluminous literature on this subject and adjusted relative to the efficiency of the BMP in reducing them. Efficiency data are also abundant in the literature of the stormwater management field for common BMPs, like the underdrained biofiltration units proposed for the subject development. The adjusted mass loadings from the various subcatchments are added to determine the totals at the ultimate site discharge point to the receiving water. This exercise is also performed for the pre-development land use and compared to the results for the development. For cumulative assessment purposes, the same exercise can be conducted for nearby parcels also draining to the receiving water, with its totals added to those from the subject development.

The best analysis to prepare the final EIR would be to run SMMM or LSPC plus SUSTAIN to determine the relative pollutant loadings pre- and post-development and cumulatively for all land use changes discharging stormwater runoff to the Peñasquitos Creek and Lagoon watershed. Even the spreadsheet exercise described above would provide valuable information to determine objectively if the land use changes projected to occur in the watershed will aggravate existing water quality problems. The reality is that all models, even the most advanced in algorithm development and input data population, present simplified versions of complex environmental processes. Therefore, they are most useful in making relative comparisons (e.g., between pre- and post-development pollutant generation), a situation that tends to annul their imperfections. My opinion is that a quantitative, objective assessment of prospective water quality modification associated with the proposed development should be required for the final EIR.

III. SPECIFIC ASSESSMENT OF PROPOSED BEST MANAGEMENT PRACTICES

Section 5.18.3 of the dEIR lists the proposed general stormwater management practices: *“Site-specific source control BMPs include prevention of illicit discharges, storm drain stenciling, integrated pest management principles, and efficient landscape and irrigation design. Treatment BMPs selected for the proposed project include multiple lined biofiltration basins.”* The source control BMPs are not further elaborated. Appendix S does give substantial additional detail on the biofiltration basins.

A. Source Control BMPs

The vague source control list is highly inadequate. First, it is incomplete in relation to the

O5-5-9 Refer to **Response to Comment O5-5-2d**.

O5-5-8
Cont.

O5-5-9

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San Diego MS4 permit's directive regarding source control [at paragraph E.3.a(2)]. Furthermore, a mere listing is insufficient for any thoughtful determination of extent and quality of implementation that may result. The final EIR should augment the list and substantially amplify where and how each practice will be utilized.

B. Treatment and Hydromodification Control BMPs

1. Scope of the Management Plan

The Trails at Carmel Mountain Ranch site is divided into 15 drainage management areas (DMAs). Ten are to be served with biofiltration basins. The remaining five are "self-mitigating" according to Appendix S,⁷ which presumably means that all runoff is retained within the DMA and does not discharge from it on the surface; at least I can imagine no other interpretation. There is no further discussion of these areas, and it is unclear why they can function as such and others cannot. Based on the data presented, the self-mitigated areas are similar in size and soil characteristics to other DMAs. The final EIR should clarify this issue. If I am correct that self-mitigation means on-site retention, this is the best BMP there is, since no runoff discharges to create hydromodification or water quality problems in the receiving waters. The final EIR should further examine if other DMAs could, at least partially, use this practice.

The 10 biofiltration basins are to provide both hydromodification control and water quality treatment. They are designed to have impermeable liners and underdrains because of the supposed unsuitability of the site to infiltrate water adequately for proper functioning. The underdrains convey water percolating through the soil column to a surface discharge point. I accept that the general soil conditions, as reported in the Geotechnical Report (Appendix J), are not promising for infiltration. However, there has been no infiltration testing at the exact intended sites for the basins, and soils can vary extensively around a site. I believe that, in preparation of the final EIR, such testing should be performed at each prospective basin site. I hold that position because infiltrating biofiltration is superior to the underdrained configuration by entirely preventing the surface discharge of runoff that can be retained from creating hydromodification and water quality problems. Because of potential variability even within a basin, a common recommendation is to perform three tests spread around at each basin location.⁸

2. Biofiltration Basin Design Aspects

The Stormwater Quality Management Plan (Part 1) in Appendix S gives specifications for the biofiltration basins. The dimensions supposedly are adequate to serve requirements for both hydromodification control and water quality treatment. However, there is some confusion on this point. The Preliminary Hydromodification Management Study attached to Part 1 indicates that the basins were modeled for hydromodification control purposes with the SWMM model. Table 7 gives some resulting data for the basins. The soil depths cited in the table are 27 inches for all basins, whereas the specifications in tables within the core of Part 1 show that eight

⁷ Attachment 1.B: Worksheet B-2.1: DCV (pdf page 87).

⁸ California Stormwater Quality Association. 2003. California Stormwater BMP Handbook, New Development and Redevelopment (BMP TC-11, page 4). California Stormwater Quality Association, Menlo Park, CA.

O5-5-10 Refer to **Response to Comment O5-5-2e**. Note that the self-mitigating drainage management area definition is provided in Section 5.2.1 of the City of San Diego Stormwater Standards.

O5-5-11 Refer to **Response to Comment O5-5-2f** and **O5-5-2g**. The final soil depths for each basin will be provided in the Final SWQMP prior to grading permit. The final soil depths will be updated in both the water quality and hydromodification modeling to be consistent. In addition, the project is required to adhere to the drainage design guidelines dictated in the City Drainage Design Manual, which requires the use of the Rational Method for peak-flow hydrology modeling for watersheds smaller than 0.5 square miles. Although Storm Water Management Model (SWMM) can be used for hydromodification modeling, the Rational Method is required for peak-flow modeling. The recommendation for using BF-2 nutrient sensitive media and flow spreaders will be evaluated during final engineering.

O5-5-10

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of the ten basins actually have soil depths of 21 inches. Detention volume, and the associated hydromodification control, would be underestimated if the basins have soil columns only 21 inches deep and the modeling assumed 27 inches. This error must be corrected for the final EIR.

To further confuse the issue, the Drainage Study (Appendix E) presents detention modeling for two basins (9 and 11) conducted using the Rational Method as the hydrologic model. The document then states, *“During final engineering, calculations will be prepared for all basins to show final detained flow rates out of the detention basins.”* Whether or not all basins have been fully specified must be settled in the final EIR. In any event, the Rational Method is highly inferior in comparison to SWMM and other continuous hydrologic simulation models and should not be used.

To return to the issue of basin soil depth, 21 inches in most of the basins places some limits on their probable effectiveness. One obvious benefit of a deeper soil column is more contact time between pollutants in percolating water and the medium that extracts those pollutants and prevents their discharge. Furthermore, vegetation larger than grasses and other low-growing herbaceous plants, offers treatment and hydromodification control advantages but requires deeper soil for rooting. Bushes and trees provide several beneficial hydrologic services. Their leaves intercept falling raindrops and evaporate some back to the atmosphere. Roots take in percolating water to nourish above-ground tissue, where the leaves transpire some back to the atmosphere. If infiltrating biofilters can be used, tree roots form channels through the soil and promote effective percolation. Since the development will drain to waters with water quality impairments and a TMDL, all treatment advantages should be pursued, including deepening the biofiltration basin soils well beyond the 18-inch minimum prescribed by the 2020 County of San Diego BMP Design Manual (the BMP Manual). Soil column depths of 36 inches would increase treatment residence time by 71 percent, compared to 21 inches, and would support a vegetation canopy including trees and bushes as well as herbaceous plants.

As pointed out earlier, Peñasquitos Creek is on the CWA 303(d) list as impaired for total nitrogen, a nutrient that, when in excess supply relative to physiological needs, leads to excessive growth of algae, a process known as eutrophication. There is not only increased algal abundance but also a tendency to change the community from single-celled organisms to filamentous forms, which are less desirable for several reasons. They are generally an inferior food source for wildlife; clog water intakes, conveyances, and boat motors; and foul beaches when they wash up on them. Some filamentous blue-green algae produce toxins that can kill an animal that drinks directly from the water and must be removed before distributing to humans. When the increased masses of algae die, bacteria decomposing them exert a large demand on the oxygen dissolved in the water and reduce the amount available for aquatic life. Rooted and floating aquatic plant growth is also over-stimulated in a eutrophic condition, with further negative impacts.

Underdrained biofilters, while generally relatively effective in capturing most pollutants, actually have often been seen to release more nutrients like nitrogen than enter. One source of net nutrient export is the organic compost that often constitutes the biofiltration soil medium and serves well in capturing pollutants other than nutrients. Another source is nutrient release during plant senescence and decomposition. The BMP Manual has recognized this problem and

O5-5-11
Cont.

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specified: *"Where receiving waters are impaired or have a TMDL for nutrients, the system is designed with nutrient sensitive media design (see fact sheet BF-2)."* The fact sheet, located in Appendix E.15 of the manual gives instructions regarding the soil medium composition, plant selection and establishment, and a water retention zone below the underdrain in aggregate (crushed rock and gravel). The dEIR does not address this issue, but the final EIR should commit to using nutrient sensitive media design.

The BMP Manual specifies that the area contributing runoff to biofiltration basins like proposed for Carmel Mountain Ranch is to be ≤ 5 acres, with ≤ 1 acre preferred. The reason is that high flows generated in larger areas tend not to disperse evenly over the surface and thus are not treated uniformly. The BMP Manual would allow a larger contributing area, with agency approval, if the basin incorporates design features (*e.g.*, flow spreaders) to promote even distribution. Of the 10 proposed Carmel Mountain Ranch biofiltration basins, eight have contributing areas larger than 5 acres, as much as 14.9 acres. The final EIR should spell out how the basins will comply with the BMP Manual specifications.

I would be pleased to answer any questions you or others to whom the letter is distributed may have.

Sincerely,



Richard R. Horner

Attachments: A. Background and Experience; Richard R. Horner, Ph.D.
B. Model Construction Stormwater Management Program

O5-5-11
Cont.

Attachment A. RICHARD R. HORNER, Ph.D.

BACKGROUND AND EXPERIENCE

I have 54 years of professional experience, 44 teaching and performing research at the college and university level. For the last 43 years I have specialized in research, teaching, and consulting in the area of stormwater runoff and surface water management.

I received a Ph.D. in Civil and Environmental Engineering from the University of Washington in 1978, following two Mechanical Engineering degrees from the University of Pennsylvania in 1965 and 1966. Although my degrees are all in engineering, I have had substantial course work and practical experience in aquatic biology and chemistry.

For 12 years beginning in 1981, I was a full-time research professor in the University of Washington's Department of Civil and Environmental Engineering. From 1993 until 2011, I served half time in that position and had adjunct appointments in two additional departments (Landscape Architecture and the College of the Environment's Center for Urban Horticulture). I spent the remainder of my time in private consulting through a sole proprietorship. My appointment became emeritus in late 2011, but I continue university research and teaching at a reduced level while maintaining my consulting practice.

My research, teaching, and consulting embrace all aspects of stormwater management, including determination of pollutant sources; their transport and fate in the environment; physical, chemical, and ecological impacts; and solutions to these problems through better structural and non-structural management practices.

I have conducted numerous research investigations and consulting projects on these subjects. Serving as a principal or co-principal investigator on more than 40 research studies, my work has produced three books, approximately 30 papers in the peer-reviewed literature, and over 20 reviewed papers in conference proceedings. I have also authored or co-authored more than 80 scientific or technical reports.

In addition to graduate and undergraduate teaching, I have taught many continuing education short courses to professionals in practice. My consulting clients include federal, state, and local government agencies; citizens' environmental groups; and private firms that work for these entities, primarily on the West Coast of the United States and Canada but in some instances elsewhere in the nation.

Over a 17-year period beginning in 1986 I spent a major share of my time as the principal investigator on two extended research projects concerning the ecological responses of freshwater resources to urban conditions and the urbanization process. I led an interdisciplinary team for 11 years in studying the effects of human activities on freshwater wetlands of the Puget Sound lowlands. This work led to a comprehensive set of management guidelines to reduce negative effects and a published book detailing the study and its results. The second effort involved an analogous investigation over 10 years of human effects on Puget Sound's salmon spawning and

rearing streams. These two research programs have had broad sponsorship, including the U.S. Environmental Protection Agency, the Washington Department of Ecology, and a number of local governments.

I have helped to develop stormwater management programs in Washington State, California, and British Columbia and studied such programs around the nation. I was one of four principal participants in a U.S. Environmental Protection Agency-sponsored assessment of 32 state, regional, and local programs spread among 14 states in arid, semi-arid, and humid areas of the West and Southwest, as well as the Midwest, Northeast, and Southeast. This evaluation led to the 1997 publication of “Institutional Aspects of Urban Runoff Management: A Guide for Program Development and Implementation” (subtitled “A Comprehensive Review of the Institutional Framework of Successful Urban Runoff Management Programs”).

My background includes 26 years of work in California, where I have been a federal court-appointed overseer of stormwater program development and implementation at the city and county level and for two California Department of Transportation districts. I was directly involved in the process of developing the 13 volumes of Los Angeles County’s Stormwater Program Implementation Manual, working under the terms of a settlement agreement in federal court as the plaintiffs’ technical representative. My role was to provide quality-control review of multiple drafts of each volume and contribute to bringing the program and all of its elements to an adequate level. I have also evaluated the stormwater programs in San Diego, Orange, Riverside, San Bernardino, Ventura, Santa Barbara, San Luis Obispo, and Monterey Counties, as well as a regional program for the San Francisco Bay Area. At the recommendation of San Diego Baykeeper, I have been a consultant on stormwater issues to the City of San Diego, the San Diego Unified Port District, and the San Diego County Regional Airport Authority.

I was a member of the National Academy of Sciences-National Research Council (“NAS-NRC”) committee on Reducing Stormwater Discharge Contributions to Water Pollution. NAS-NRC committees bring together experts to address broad national issues and give unbiased advice to the federal government. The present panel was the first ever to be appointed on the subject of stormwater. Its broad goals were to understand better the links between stormwater discharges and impacts on water resources, to assess the state of the science of stormwater management, and to apply the findings to make policy recommendations to the U.S. Environmental Protection Agency relative to municipal, industrial, and construction stormwater permitting. My principal contribution to the committee’s final report, issued in October 2008, was the chapter presenting the committee’s recommendations for broadly revamping the nation’s stormwater program.

Attachment B. Model Construction Stormwater Management Program

A. Erosion and sediment transport—Manage the construction site to avoid, or minimize to the maximum extent possible, the release of sediments and other pollutants from the site through the use of the following measures.

1. As the top priority emphasize construction management BMPs, such as:
 - Maintain existing vegetation cover, if it exists, as long as possible;
 - Perform ground-disturbing work in the season with smaller risk of erosion, and work off disturbed ground in the higher risk season.
 - Limit ground disturbance to the amount that can be effectively controlled temporarily in the event of rain.
 - Use natural depressions and planning excavation to drain runoff internally and isolate areas of potential sediment and other pollutant generation from draining off the site, so long as safe in large storms;
 - Schedule and coordinate rough grading, finish grading, and erosion control application to be completed in the shortest possible time overall and with the shortest possible lag between these work activities.
2. If construction management BMPs cannot fully prevent soil exposure, apply stabilization BMPs that provide cover appropriate to site conditions, season, and future work plans, e.g.:
 - Rapidly stabilize disturbed areas that could drain off the site, and that will not be worked again, with permanent vegetation supplemented with highly effective temporary erosion controls until achievement of at least 90 percent vegetative soil cover.
 - Rapidly stabilize disturbed areas that could drain off the site, and that will not be worked again for more than three days, with highly effective temporary erosion controls.
 - If at least 0.1 inch of rain is predicted with a probability of 40 percent or more, before rain falls stabilize or isolate disturbed areas that could drain off the site, and that are being actively worked or will be within three days, with measures that will prevent or minimize to the greatest extent possible the transport of sediment off the property.
3. As backup for cases where all of the above measures are used to the maximum extent possible but sediments still could be released from the site, consider the need for sediment collection BMPs including, but not limited to, conventional settling ponds and advanced sediment collection devices such as polymer-assisted sedimentation and advance sand filtration.
4. Specify emergency stabilization and/or runoff collection BMPs (e.g., using temporary depressions) procedures for areas of active work when rain is forecast.
5. If sediment-bearing runoff could still leave the site, use perimeter control BMPs (e.g., silt fence) as backup where some soil exposure will still occur, even with the best possible erosion control (above measures) or when there is discharge to a sensitive water body.
6. Specify flow control BMPs to prevent or minimize to the extent possible:
 - Flow of relatively clean off-site water over bare soil or potentially contaminated areas;

- Flow of relatively clean intercepted groundwater over bare soil or potentially contaminated areas;
- High velocities of flow over relatively steep and/or long slopes, in excess of what erosion control coverings can withstand;
- Erosion of channels by concentrated flows either by using channel lining, velocity control, or both.

7. Specify construction entrance and exit area stabilization BMPs, provision of a nearby tire and chassis wash for dirty vehicles leaving the site with a wash water sediment trap, and a sweeping plan.

8. Specify construction road stabilization BMPs.

9. Specify wind erosion control BMPs.

B. Other pollutants—Manage the construction site to avoid the release of pollutants other than sediments by preventing contact between rainfall or runoff and potentially polluting construction materials, processes, wastes, and vehicle and equipment fluids by such source control BMPs as enclosures, covers, and containments, as well as berming to direct runoff.

- Flow of relatively clean intercepted groundwater over bare soil or potentially contaminated areas;
- High velocities of flow over relatively steep and/or long slopes, in excess of what erosion control coverings can withstand;
- Erosion of channels by concentrated flows either by using channel lining, velocity control, or both.

7. Specify construction entrance and exit area stabilization BMPs, provision of a nearby tire and chassis wash for dirty vehicles leaving the site with a wash water sediment trap, and a sweeping plan.

8. Specify construction road stabilization BMPs.

9. Specify wind erosion control BMPs.

B. Other pollutants—Manage the construction site to avoid the release of pollutants other than sediments by preventing contact between rainfall or runoff and potentially polluting construction materials, processes, wastes, and vehicle and equipment fluids by such source control BMPs as enclosures, covers, and containments, as well as berms to direct runoff.

Response to Comments

Attachments to Letter O5 DeLano and DeLano

The following attachments were provided with the DeLano and Delano comment letter received February 8, 2021; however due to length of the documents, they have not been printed or provided as part of the digital file for the Final EIR for the Trails at Carmel Mountain Ranch. Copies of these documents can be obtained by contacting Elizabeth Shearer-Nguyen, Senior Planner, City of San Diego Development Services Department at EShearer@sandiego.gov or (619) 446-5369.

1. Letter from SWAPE Technical Consultants included the following attachments:
 - a. Attachment A: SWAPE HRA Calculations
 - b. Attachment B: SWAPE Project CalEEMod Modeling (Draft EIR Appendix A to Appendix H)
 - c. Attachment C: SWAPE Project AERSCREEN Modeling
 - d. Attachment D: Paul Rosenfeld CV
 - e. Attachment E: Matt Hagemann CV
2. Copy of CEQA Guidelines Section 15064;
3. Copy of the Trails at Carmel Mountain Ranch Draft EIR Figure 3-1
4. Copy of *"Anthropogenic Substrate-Borne Vibrations Impact Anuran Calling"* by Valentina Caorsi, et. al. (December 19, 2019);
5. Copy of *"Comparative Vibration Levels Perceived Among Species in a Laboratory Animal Facility"* by John Norton, et. al. (September 2011);
6. Copy of *"The Effects of Car Traffic on Breeding Bird Populations in Woodland. I. Evidence of Reduced Habitat Quality for Willow Warblers (*Phylloscopus trochilus*) Breeding Close to a Highway"* by R. Reijnen and Ruud Foppen (August 1995);
7. Copy of *"Effects of Experimental Anthropogenic Noise Exposure on the Reproductive Success of Secondary Cavity Nesting Birds"* by T. Mullholland, et. al. (January 7, 2018).

Comment Letter I1

Individuals

Response to Comment Letter I1

1 Jacqueline Weir

January 24, 2021

- I1-1** The City acknowledges the comment as an introduction to comments that follow.
- I1-2** Refer to **Master Response 1** and **2** regarding community character and aesthetics, respectively.
- I1-3** Refer to **Response to Comment O2-11a** regarding the reduction of open space.
- I1-4** Refer to **Response to Comment O1-11** regarding SB 375 consistency. Furthermore, refer to **Response to Comment O5-3** regarding population-based park requirements and **Response to Comment O2-11a** regarding parks and open space.

January 24, 2021

E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

Via e-mail to DSDEAS@sandiego.gov

RE: (Carmel Mountain Ranch) Trails at Carmel Mountain Ranch / Project No. 652519

Dear Ms. Shearer-Nguyen and City Council Members:

Regarding project no 652519 there are significant concerns that me and my family have regarding this proposed new development and the Environmental Impact Report (EIR) does not adequately address these concerns.

Community Character

This development is a plan to build up to 1,200 units. As a homeowner of 21 years in Carmel Mountain Ranch and a very tight knit community where neighbors know each other I would suggest a more modest project of 250 or less single family and/or attached homes. This would fit better with the community character of Carmel Mountain Ranch whereby approximately 80% of the housing in CMR is single family homes. Reducing the quantity of units would also maintain more open space.

Open Space

In the EIR section 16. Loss of land designated as parkland. The EIR quotes the SD general plan that states: "The project site is designated Park, Open Space, and Recreation in the General Plan." However, this development does not maintain the Open Space that currently exists and in fact consumes the majority of open space. In fact, this project would result in the reduction of 52 acres of open space. The EIR violates Senate Bill 375 that requires that California preserve open space and not build large housing projects on open space and park land. San Diego's new Parks Master Plan requires that San Diego provide thriving recreational spaces, allow for flexibility and innovation to provide unique recreational opportunities and prioritize investments in parks. Building new development on current park land or open space is not in the best interest of San Diego or the environment.

Page 1 of 3

Climate Change

I have reviewed the 2015 Climate Action Plan (Our Climate Our Future) that requires developers to incorporate planning-related adaptation strategies (page 59 of the Plan) such as "...designating land for a full range of uses, including open spaces and high-density areas where appropriate." The Plan also requires "San Diego Green Streets" grassy swales and infiltration basins" as Green Spaces serve as a climate change adaptation resource where they can alleviate the heat island effect and potentially reduce the impact of flooding" pages 62-63 of the Plan. The development plans described in Project No. 652519 are in conflict with development of the scale proposed (up to 1,200 multi-family units).

Fugitive Dust and Valley Fever

I am very concerned about the health hazards related to dust, microbes, and Toxic Air Contaminants that will be emitted during this project. CMR is a mountainous area and this project proposes significant grading of earth in order to build these structures.

Valley Fever is a serious and sometimes fatal lung infection known as coccidioidomycosis which is often associated with grading and earthmoving. Some people experience a chronic cough; others can be stricken for years into such a limited capacity as to be bedridden by the infection. The operation of a construction site completely surrounded by residents in an area where Valley Fever occurs increases the rate of exposure and threatens those frequently outdoors, especially seniors and children.

EIR Section 5.3 indicates that "fugitive dust emissions are not anticipated" but this is an erroneous statement. Earth will need to be graded throughout much of The Trails project and this will emit dust. I recommend that there be new source review requirements for the dust and air contaminants that are subject to SDAPCD Rule 1200. The EIR states: "Development of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM10 and PM2.5 emissions. The proposed project would be subject to SDAPCD Rule 55, Fugitive Dust Control. This rule requires that the proposed project take steps to restrict visible emissions of fugitive dust..." Amazingly the EIR reaches an erroneous conclusion: "Maximum daily overlap of construction and operation would not exceed the operational emissions threshold or the 100 pounds per day threshold of PM10. Impacts would be

11-5

Refer to **Master Response 8**, regarding the Climate Action Plan Consistency Checklist. As stated therein, the project would not conflict with the City's Climate Action Plan. The Climate Action Plan Consistency Checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the Climate Action Plan are achieved. Regarding green streets and alleviation of the heat island effect, also refer to **Master Response 8**. As explained in Section 5.7 of the Draft EIR, the project was determined to result in less than significant impacts related to greenhouse gas emissions and the City believes this topic has been adequately addressed in the Draft EIR. In addition, treatment of on-site stormwater prior to discharging into the downstream systems would be facilitated by several biofiltration basins (see Figure 5.10-1, Proposed Offsite Drainage Points of Connection, of the Draft EIR). Furthermore, the proposed project would incorporate construction best management practices (BMPs) in accordance with the City's Stormwater Standards Manual. BMPs would typically include street sweeping, waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, and proper handling and storage of hazardous materials. Typical erosion and sediment control BMPs include silt fences, fiber rolls, gravel bags, temporary desilting basins, velocity check dams, temporary ditches or swales, stormwater inlet protection, and soil stabilization measures.

- I1-6** As described in **Master Response 7**, particulate matter emissions would not exceed the allowable threshold of 100 pounds per day.
- I1-7** ~~As described in~~ Refer to **Master Response 7**, regarding Valley Fever.
- I1-8** Refer to **Master Response 7**, regarding fugitive dust emissions.
- I1-9** Refer to **Master Response 7**, regarding fugitive dust emissions.

less than significant. No mitigation would be required". This is NOT a logical conclusion and I am very concerned about the respiratory health of myself and my neighbors in CMR.

Greenhouse Gas Emissions

The development of The Trails will contribute to greenhouse gas emissions. The EIR on this project does not provide a mitigation plan. I have attended the HOA Golf Course Sub-Committee Meetings and San Diego City Council meetings. I have also reviewed California Environmental Quality Act (CEQA) that was established in 1970. CEQA provides support of citizens to challenge environmental damage posed by uncontrolled new development. Among several significant purposes of CEQA, it identifies ways that potential significant environmental impact(s) can be avoided or significantly reduced. CEQA works to prevent significant avoidable damage to the environment by requiring changes in the project through alternatives and mitigation. Per CEQA, new development must not have "Substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

Wildfires and Evacuation Routes

We need to consider the impact of climate change and increasing risk of wildfires in California and especially in San Diego County. I have lived in Carmel Mountain Ranch for 21 years. Through almost every fire in San Diego County in recent years, CMR has been in a mandatory evacuation zone as this area in general is a very high fire zone and this development would exacerbate an already poor wildfire evacuation situation. There have been 55 fires in the last century within San Diego County, two within the last couple of years. The EIR does not specify how emergency evacuations will be accommodated with The Trails being added into an already compacted community.

Thank you for considering the concerns of my family and the residents of CMR.

Jacqueline Weir
Jacqueline Weir
11929 Tivoli Park Row, Unit #7
San Diego, CA 92128-6502
(858) 212-3595
jauusiel@outlook.com

↑ I1-9
| Cont.

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| I1-10
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|
| I1-11
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| I1-12
|
| I1-13

I1-10 Refer to **Master Response 8**. As described in the environmental document, the Draft EIR identified the significant effects caused by the project and identification of mitigation measures, where feasible.

I1-11 Refer to **Master Response 5**, regarding evacuation.

I1-12 Refer to **Master Response 5**, regarding wildfires and evacuation.

I1-13 Comment noted.

Comment Letter I2

From: John Paterson <paterson@dslextre.com>
Sent: Saturday, January 16, 2021 7:18 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Comments on Project No. 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Sir/Madam,
 I would like to provide my comments on the following project.

General Project Information:
 Project Name: Trails at Carmel Mountain Ranch
 Project No. 652519 / SCH No. 2020039006
 Community Plan Area: Carmel Mountain Ranch
 Council District: 5

I am a resident in the Carmel Mountain Ranch community and own a house adjacent to the closed golf course, the site of the proposed project.

After reviewing the plan and the draft Environmental Impact Report I have the following comments.

1. The planned 1,200 units including a high percentage of rental units will significantly increase the amount of people in an area not designed to support that large number people. This density will significantly increase traffic on our congested streets, create parking problems, over load our existing stores and schools. My recommendation would be to significantly reduce the amount of homes allowed.
2. The planned community includes multi-story rental buildings/condos in a community that primarily has only two story buildings. This will negatively impact existing owners views, add significant density of people and cars to our already congested streets. My recommendation would be to place a maximum of two stories on all new buildings.
3. Existing property is zoned for agriculture to create a small amount of open space for an already densely planned community. I recommend keeping the majority of the property zoned as agriculture and open small lots for high end single or two story residential buildings to retain the existing community master plan.

In summary, I oppose the "Trails at Carmel Mountain Ranch" plan and believe it should be rejected and designed to match the existing master plan for the Carmel Mountain Ranch community. Plan should consider far fewer buildings and should concentrate on retaining as much open space as possible with the inclusion of single family residences in one to two story properties.

Thank you,
 John Paterson
 14750 Carmel Ridge Road
 San Diego, CA 92128

858-774-1923

I2-1

I2-2

I2-3

I2-4

I2-5

Response to Comment Letter I2

2 John Patterson
 January 16, 2021

I2-1

The City acknowledges the comment as an introduction to comments that follow.

I2-2

Regarding density, refer to **Master Response 1**. Traffic impacts are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. As described therein, the proposed project would result in a significant and unavoidable transportation/circulation impact. Refer to **Master Response 3**, regarding traffic and parking. School capacity is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR, and impacts were determined to be less than significant. Refer to **Master Response 6**.

I2-3

Refer to **Master Response 1**, regarding density.

Traffic impacts are discussed in Section 5.2, Transportation. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Private views, such as those from neighboring properties, are not protected under the City's Significance Determination Thresholds and CEQA. Refer to **Master Response 2**. In addition to single-family residential, apartment and condominium developments are adjacent to the project site and constructed at a range of densities. For example, there is a three-story apartment development off Rancho Carmel Drive (i.e., Carmel Landing). To the north of this development (north of Windcrest Lane) are the two- to three-story

Carmel Terrace apartments. The comment addresses subject areas, which received analysis in the Draft EIR.

I2-4 Refer to **Response to Comment O2-11a** regarding parks and open space. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. Also refer to **Master Response 1** and **2**.

I2-5 Comment noted.

Comment Letter I3

From: lkw3 <lkw3@yahoo.com>
Sent: Tuesday, January 26, 2021 6:12 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel mountain ranch-gold course development(Project No. 652519)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I am strongly against the proposed plan that build 1,200 units on the golf course. As current resident nearby, we have already experienced heavy traffic on Ted Williams/route 15 intersection and nearby roads. Also the shopping area has experienced congested parking and traffic already. This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other issues for our community. Therefore, as a resident that will be seriously adversely impacted, I oppose the approval of the plan.

I3-1

Thanks,

Ling

Sent from my iPad

Sent from my iPad

Response to Comment Letter I3
3 Ling
January 26, 2021

I3-1

Regarding density, refer to **Master Response 1**. Regarding traffic, traffic impacts are discussed in Section 5.2, Transportation/Circulation. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** for additional information on traffic, congestion, and parking.

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Comment Letter I4

From: Myles <MylesTheGirl@gmail.com>
Sent: Wednesday, January 27, 2021 11:09 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mountain Ranch - Golf Course Development

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Please consider the impact on the existing homes, homeowners, residents, schools, shopping centers, and traffic. You can have someone sit and evaluate through computer programs and processes, but that's not the same as someone who has to deal with the daily congestion of the local area.

Have you tried to go to Trader Joes in Carmel Mountain?

Have you tried to drive from Carmel Mountain Road through Camino del Norte to Bernardo Heights Middle School/RB High School? Yes, there's not an issue now, but school is not meeting in person.

Have you considered the horrible conditions of the streets in the area? I have been begging for the streets and potholes to be repaired, adding more traffic will only make it worse! Look at the satellite image of Paseo Lucido and Avenida Venusto, the asphalt is non-existent.

Have you sat at one of the traffic lights in the area, sit through a red light and count how many people run the light. Adding more homes will only increase the issue.

Please do not approve the development of this golf course, not for homes. We need more parks and areas for families.

I4-1

Response to Comment Letter I4
4 Myles
January 27, 2021

Refer to **Master Response 1**, regarding density. Traffic impacts are discussed in Section 5.2, Transportation/Circulation. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. With regard to schools, impacts to schools were determined to be less than significant, as detailed in Section 5.14, Public Services and Facilities of the Draft EIR. Also refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I5

From: Yashar Mirabolfathi <yashar.mir@gmail.com>
Sent: Wednesday, January 27, 2021 2:59 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch (Project No. 652519)/ Comments

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi,

My name is Yashar Mirabolfathi who is the owner and resident at 10534 Rancho Carmel Dr. San Diego, CA 92128.

Below are my comments and concerns in regards to the proposed 165.5-acre, 1,200 multi-family residential unit Trails at Carmel Mountain Ranch.

Please stop this proposed project and allow us to continue our happy life in this community.

1- Long term construction impacts on my family daily life such as air quality & traffic.

2- Noise impact on us and the surrounding environment.

3- Traffic impact after project completion with inducing travel.

4- Public services and facilities impacts such as police, fire rescue, school services.

5- Water quality impacts.

6- Water supply impact.

7- Carmel mountain community is already crowded. With having these units built, it will definitely bring down the life quality of the existing residents.

8- Shopping centers at Carmel mountain have already issues with parking spaces available for current residents. I am not sure if building these units will help the situation at all.

9- We already have a lack of police services in this community with current rising burglary and car robberies. 1200 new units will make this situation worse for us.

10- My family safety and security is my priority. This project will definitely make this neighborhood over crowded and will affect the public services quality.

PLEASE STOP THIS PROJECT.

Thank you,

Yashar Mirabolfathi

I 15-1

I 15-2

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I 15-11

Response to Comment Letter I5

5 Yashar Mirabolfathi
January 27, 2021

I5-1

The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

I5-2

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Refer to **Master Response 7**. Air quality impacts were determined to be less than significant. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

I5-3

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses a subject area, which received analysis in the Draft EIR.

I5-4

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses a subject area, which received analysis in the Draft EIR.

I5-5

Public services and facilities are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact on library facilities. With regard to schools,

impacts were determined to be less than significant, ~~as it relates to schools.~~ Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

I5-6 Water quality is discussed in Section 5.18, Water Quality, of the Draft EIR. Impacts to water quality were determined to be less than significant. The comment addresses a subject area, which received analysis in the Draft EIR.

I5-7 Water supply is discussed in Section 5.15, Public Utilities, of the Draft EIR. A water supply assessment (WSA) was prepared for the proposed project, which determined total water supplies available would meet the projected water demand of the project in addition to the demand of existing and other planned uses. Impacts to water supply were determined to be less than significant. The comment addresses a subject area, which received analysis in the Draft EIR.

I5-8 Comment noted.

I5-9 Refer to **Master Response 3** regarding parking.

I5-10 Police services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police services were determined to be less than significant. The comment addresses a subject area, which received analysis in the Draft EIR.

- I5-11** Public services and facilities are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6** regarding schools and library facilities. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I6

From: Amin Salmani <amin.salmani@gmail.com>
Sent: Wednesday, January 27, 2021 12:27 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] RE: Carmel Mountain Ranch development project _1,200-unit housing project in environmental review

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

This is Amin, I currently reside in Carmel Mountain Ranch at 14424 N Church Square, San Diego, CA 92128.

We live close by the closed golf course and we strongly oppose the proposed development plan. This plan will essentially ruin the whole neighborhood with the heavy traffic and lack of infrastructure for the community. There will be a shortage of schools, green landscape. Also it will increase the risk of fire as well as the time for the fire department to get to any accident due to the traffic.

1200 units is a CRAZY large number. YOU SHOULD NOT increase the population of a neighborhood by around 50% without doing thorough studies and investing first in the infrastructure.

In my opinion, this Project will only benefit the developers and big corporates and does not consider neighborhood families and people's benefit.

Please STOP this and think about the people and neighbourhood that voted for you.

If you need me to talk and give my opinion during an official hearing, please let me know and I can be there to defend our neighborhood.

Thanks,
Amin Salmani

I 16-1
I 16-2
I 16-3

I 16-4

I 16-5

Response to Comment Letter I6

6 Amin Salmani
January 27, 2021

I6-1

The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

I6-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are also discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated. With regard to school capacity, school capacity is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR and impacts were determined to be less than significant. Refer to **Master Response 6**. Open space is discussed in Section 5.14, Public Services and Facilities. Refer to **Response to Comment O2-11a** regarding parks and open space. The comment addresses subject areas, which received analysis in the Draft EIR.

I6-3

Refer to **Master Response 5**, regarding wildfire and evacuation. Wildfire hazards and fire protection service impacts were determined to be less than significant. Additionally, as discussed in Section 5.14,

Public Services and Facilities, the City of San Diego Fire and Rescue Department has adequate facilities and staffing in the project area to serve the project and no additional capacity would be required. The comment addresses subject areas, which received analysis in the Draft EIR.

I6-4 Refer to **Master Response 1**, regarding density. Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

I6-5 Comment noted.

Comment Letter I7

From: B V <bhaskaran.vasudev@gmail.com>
Sent: Wednesday, January 27, 2021 4:54 PM
To: DSD EAS <DSDEAS@sanidgo.gov>
Subject: [EXTERNAL] response to the EIR for the Project 'The Trails at Carmel Mountain Ranch'

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Shearer-Nguyen

This email is in response to the EIR related to the project 'The Trails at Carmel Mountain Ranch' under the Project Number 652519/SCH No. 2020039006.

I am a home owner in Carmel Mountain Ranch since 2009 and my property adjoins the Carmel Mountain Ranch golf course which is the subject of the above mentioned project. Based on my understanding of this project and looking over the EIR I have several concerns

1. The density of housing will add to the traffic near my property especially during school hours and already we experience backups when the school is in session and we expect more of it as residents of the project will have their children attend Highland Ranch Elementary school.

2. I also feel that there will be increased noise level since the exit from the project will most likely be the road that may be put very close to my property as that appears to be easy access to Highland Ranch Road. This will increase noise and kick up dust from the roadway as vehicles pass by.

3. The plan of this project as I understand it is to have multi level housing upto 3 floors. This will essentially provide no privacy to me as the occupants on the higher floors can then easily see into my backyard as no high walls appear to be planned on the boundary of this project.

4. We also expect a large number of cars on the road and also constrain the parking in nearby shopping mall which contain grocery stores such as Ralph and Trader Joe. Even now parking is tight there and with the increased number of cars we expect parking to be in short supply in that mall.

I would urge the city to consider these factors and push for a lower density of housing planned for the above mentioned project.

Thanking you for your kind consideration of my concerns as a homeowner,
Sincerely

Vasudev Bhaskaran and Adelaida Vasudev
12229 Eastbourne Road, San Diego, 92128.

I7-1

I7-2

I7-3

I7-4

I7-5

I7-6

Response to Comment Letter I7

7 Bhaskaran & Adelaida Vasudev

January 27, 2021

I7-1

The City acknowledges the comment as an introduction to comments that follow.

I7-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR and impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

I7-3

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Dust is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

I7-4

Refer to **Master Response 2** regarding private views.

I7-5

Transportation/circulation impacts are addressed in Section 5.2, Transportation of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**, regarding transportation/circulation and parking.

I7-6

Refer to **Master Response 1**, regarding density.

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Comment Letter I8

From: Billy Bass <billybass0909@gmail.com>
Sent: Wednesday, January 27, 2021 1:01 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch (Project No. 652519 SCH No. 2020039006)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To who it concerns,

My name is Bill Breyers and I reside in Carmel Mountain. I have read up on the Trails at CMR project and do not believe it is a wise decision for our neighborhood. The proposed plans will depreciate the value of current homes, and the additional traffic and congestion will negatively impact the way of life for the community. This is a clean, quiet, and respectable suburb to live and raise families. Let's keep it that way. I am voicing my opinion with a resounding "NO" to the Trails at CMR.

Thank you,
 BB

1

I8-1

Response to Comment Letter I8
8 Bill Breyers
January 27, 2021

I8-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Additionally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

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Comment Letter I9

From: Bruce Forinash <brucef@investmentleasing.com>
Sent: Tuesday, January 26, 2021 8:17 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] FW: Re: Comment about 1,200 Housing Units Proposed for Old Carmel Mountain Ranch Golf Course - Trails at Carmel Mountain Ranch - Project 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern-

I am all in favor of the proposed development plan and like it fully and support t.

Thank you,

Bruce Forinash, 17-year homeowner in Carmel Mountain Ranch
11907 Danvers Circle
San Diego, CA 92128

Call me at 858-735-5271

Bruce Forinash, Leasing Agent
(20+ years with Company)
brucef@investmentleasing.com
www.investmentleasing.com
800-400-5060 x 101 Work
858-735-5271 Mobile (available beginning at 9 am EST)
858-451-0033 Fax

Investment Leasing Company
Equipment, Software, & Vehicle Leasing & Financing Since 1986

FedEx & UPS address: 11835 Carmel Mt. Rd., Suite 1304-351, San Diego, CA 92128
All mail: P.O. Box 500110, San Diego, CA, 92150
Office: 16935 West Bernardo Dr., Suite #235, San Diego, CA 92127

Leases and loans will be arranged or made pursuant to California Department of Business Oversight's California Financing Law, License #603H958

I9-1 Comment noted.

I9-1


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Comment Letter I10

From: Luisa Jaro <ljaro888@hawaii.rr.com>
Sent: Wednesday, January 27, 2021 9:26 AM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch 1200 Units

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern,
We have two properties in Carmel Mountain Ranch both backing the golf course. When we purchase the property we paid a premium, an extra amount to live in a property backing the golf course. We also bought it knowing that it is a master planned community with a low density housing . We certainly opposed the development of the Trails at Carmel Mountain as it would create crowded housing, crowded schools, traffic jams, less parking, lower property values and crimes might increase. Having low income and rental property in a master planned community is certainly not what we have dreamed of at Carmel Mountain Ranch. Two of our votes opposed to this development.
Thanks,
Cesar Jaro 14247 Seabridge Lane
Luisa Jaro 14437 Seabridge Lane

 Virus-free. www.avast.com

I10-1

I10-2

Response to Comment Letter I10

10 Cesar & Luisa Jaro
January 27, 2021

I10-1

Refer to **Master Response 1** regarding density.

I10-2

Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

In accordance with the CEQA Guidelines Section 15064, impacts related to public services and facilities (police, fire- rescue, and libraries) are evaluated in light of whether the impact would result in a physical change to the environment. Response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal for operations within the affected area because individual development projects cannot be required to fund ongoing operational costs nor can individual development projects make budgetary decisions regarding such funding. The provision of adequate facilities are a planning and facility matter. As discussed in Section 5.14 of the Draft EIR, the project would not result in an increased demand for facilities associated with police, fire rescue or parks and recreation ~~libraries~~ through either the provision of new or physically altered facilities. Also refer to **Master Response 6** regarding schools.

Refer to **Master Response 3** regarding parking. Finally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I11

From: Dawn Summers <dsummers3526@icloud.com>
Sent: Wednesday, January 27, 2021 7:09 AM
To: DSD EAS <DSDEAS@sanidiego.gov>; mkersey@sanidiego.gov
Subject: [EXTERNAL] Project No. 652519

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

This email is to contest the development of "The Trails at Carmel Mountain Ranch" by Urban West. My family and I have been residents in CMR (Walden Subsection) for over 20 yrs. We have seen smaller developments lead to traffic issues, increase in crimes (specifically property crimes, which leads to more serious crimes), environmental issues, air quality issues and issues related to overpopulation. A large part of the area, specially the defunct golf course, was zoned for agriculture, not residential housing and the city should not be mislead by the developer in their plans to provide "open space" and steal from the tax paying residents the reasons why we live in this community, city and state. I have complained as well for over a year about the condition of our street (the 13000 block of Esprit Ave, the main thoroughfare into Walden) that it was not paved when the rest of the streets in the area were paved 2 years ago and our street now has become gravel, potholes and a real eyesore. It will be unacceptable and a disgrace if the city allows Urban West to add to this issue with increased traffic. The city needs to take care of underlining issues before compounding them and do not make the same overcrowding, pollution adding, environmental mistakes that were plain to see in LA!

Thank You,

Dawn Summers
Debra Ragsdale
13727 Esprit Ave.
San Diego, CA 92128

Sent from my iPhone

I11-1

I11-2

I11-3

I11-4

Response to Comment Letter I11

11 Dawn Summers
January 27, 2021

I11-1

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Traffic impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

In accordance with the CEQA Guidelines, impacts related to public services and facilities (police, fire-rescue, and libraries) are evaluated in light of whether the impact would result in a physical change to the environment. Response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal for operations within the affected area because individual development projects cannot be required to fund ongoing operational costs nor can individual development projects make budgetary decisions

regarding such funding. The provision of adequate facilities are a planning and facility matter. As discussed in Section 5.14 of the Draft EIR, the project would not result in an increased demand for facilities associated with police, fire rescue or libraries through either the provision of new or physically altered facilities. Also refer to **Master Response 6** regarding schools.

Finally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I11-2 Refer to **Master Response 1**, regarding consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Refer to **Response to Comment O2-11a** regarding parks and open space.

I11-3 Comment noted.

I11-4 Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Pollution-related impacts are discussed in Section 5.3, Air Quality and Odor, Section 5.7, Greenhouse Gas Emissions, and Section 5.18, Water Quality, of the Draft EIR. Air quality, greenhouse gas emissions, and water quality impacts were determined to be less than significant. The comment addresses subject areas, which received extensive analysis in the Draft EIR.

Comment Letter I12

From: Hannah Seaman <hyseaman898989@yahoo.com>
Sent: Tuesday, January 26, 2021 9:48 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project No. 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Environmental Planner Ms. Shearer-Nghyen:

I am writing you to share my concern on the project of Trails at Carmel Mountain Ranch (Project No. 652519).

Currently the Carmel Mountain Ranch is a nice environment for the local residents and San Diego city. If the project No. 652519 is implemented, the density housing will make the area too crowded and it will look like a under-developed place. It is easy to change an area from good to bad, but it will be difficult, even impossible, to switch it back.

Would you be kind enough to cancel the project No. 652519?

Thank you so much in advance for your consideration and support.

Hannah Mason
11241 Woodrush Court
San Diego, CA 92128

I12-1

Response to Comment Letter I12

**12 Hannah Mason
January 26, 2021**

I12-1

Refer to **Master Response 1** regarding density.

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Comment Letter I13

From: Harish Pillai <hppillai@gmail.com>
Sent: Wednesday, January 27, 2021 2:38 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: CouncilMember Marni von Wilpert <MarnivonWilpert@sanidiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sanidiego.gov>; Councilmember Jennifer Campbell <JenniferCampbell@sanidiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sanidiego.gov>; SD CD4News, <CD4News@sanidiego.gov>; CouncilMember Chris Cate <ChrisCate@sanidiego.gov>; CouncilMember Raul Campillo <RaulCampillo@sanidiego.gov>; Councilmember Vivian Moreno <VivianMoreno@sanidiego.gov>; CouncilMember Sean Elo-Rivera <SeanEloRivera@sanidiego.gov>; Gloria, Todd (External) <MayorToddGloria@sanidiego.gov>
Subject: [EXTERNAL] My Family's voice - opposing the project: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Ms. Shearer-Nguyen and City Council,

Subject: My Family's opposition to the project in its current form - The Trails at Carmel Mountain Ranch
Reference: Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

I13-1
↓

Response to Comment Letter I13

13 Harish Pillai

January 27, 2021

I13-1

Refer to **Master Response 1** regarding density. The project does not violate CEQA and the comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The EIR has been prepared in accordance with the appropriate criteria, standards and procedures of CEQA (California Public Resources Code Section 21000, et seq.), and the State Guidelines.

I13-2

Alternatives were analyzed in Chapter 8 of the Draft EIR. Specifically, Table 8-1 includes a summary of impacts for each alternative as compared to the proposed project. Also refer to **Master Response 10**.

I13-3

As described in **Master Response 3**, the Draft EIR includes mitigation measure **MM-TRA-1**, which would implement vehicle miles traveled reduction measures. Implementation of **MM-TRA-1** would reduce vehicle miles traveled-related impacts; however, even with these mitigation measures, transportation/circulation impacts would remain significant and unavoidable. The comment addresses a subject area, which received analysis in the Draft EIR.

I13-4

To clarify, planned bicycle facilities included in the Community Plan and Bicycle Master Plan have been constructed at this time in the community. However, the project would include a trail system that would circulate throughout the project site to provide

This is Harish Pillai and family, residing in Carmel Mountain Ranch, very next to the proposed "Trails at Carmel Mountain Ranch" Project. We strongly oppose this project in the present proposed form. We realize that, this project will create non-repairable damage to the environment and our community. This project is violating many provisions of the California Environmental Quality Act (CEQA). My family understand the need for more housing and affordable housing in San Diego. But a sudden increase of 23% of population in one neighbourhood will be a bad plan especially the projected increase was only 2% till 2050 per city plan. Also, we reviewed the alternate suggestions to this proposal and found that except one alternative of "no project", all proposed alternatives have the same impact on our community.

My family is majorly concerned with the following facts:

1) Transportation: As of now, during morning and evening commute time, it takes at least 40 minutes - one way - to Sorrento Valley (13-mile journey)/UTC where me and my wife work. After the new proposed housing, we expect this to be greatly increased. As per the EIR document we can see that, after realizing the proposal VMT per capita will be 23.2 while the threshold is only 16.2 (Page 5.2-7). As noted in the document, the impacts would be significant and unavoidable if the proposal is realized.

There is a proposal to add more bicycle facilities. Riding a bike daily to work on a 13-mile stretch is not practical - which is a waste of time and efficiency. I would rather prefer to use that time with my family or at work. The city's goal is to have a 5-mile bike ride to work (Page 5.1-47) is not practical at CMR. It is not clear from the proposal, when CMR will see additional high paying job opportunities within 5 miles to afford the proposed high-cost project. Also, on page 5.2-6, it is said that "all planned bicycle facilities per the Community Plan and Bicycle Master Plan have been constructed and the project is not anticipated to generate enough bicycle demand to warrant additional upgrades to these facilities", which is in contradiction to VMT reduction measures in page 5.2-10

2) Population: The proposed project would add another 3180 to the total population of 13287 (Page 5.13-4). This is an increase of 23% (or simply every 4th or 5th person is a new resident) in a very short term. Even now we use the Poway Costco to fill gas as the line for Costco gas stations in CMR is huge. The city master plan indicates that the change would be about 2% by 2050. We will not have enough infrastructure available and the city should be committed to keep aside enough resources to handle the infrastructure requirements for the added 23% population. As noted in the document, the impacts would be significant and unavoidable if the proposal is realized.

3) Housing demand per city goals: As of 2019, there are a total of 88096 houses available in the whole San Diego. In the next housing element cycle ending in 2029 (~10 years from now) the expected number is 107901. This is only an increase of 18%. In this scenario, adding a 23% increase in one small area in a very short span of time (within a few years) is against the city goals (Page 5.13-5).

4) Landform changes: The project would create manufactured slopes higher than 10 feet or steeper than 2:1 (50%) (Page 5.17-19). The project design includes mass terracing of natural slopes with cut or fill slopes to construct flat-pad structures. The proposed project moves more than 2,000 cubic yards of earth per graded acre by either excavation or fill. This is categorized as having significant impact (Page 5.17-19). As per page 5-17-20, the three conditions stated to avoid significant impact are not met as "The project would create manufactured slopes higher than 10 feet or steeper than 2:1 (50%)" (Page 5.17-19). Also, seven (7) out of the ten (10) proposed units need heavy hillside developments (Page 5.17-15). For example, just behind my house, on the southern side, the proposal is for about 30 feet height of retaining wall. This will seriously affect the quality of life for me and my family due to less natural light and less air circulation.

5) Already Poway Unified Elementary system has a deficit of 113 seats for kids. The proposed project will be adding 193 more to this number. In any of the proposals or plans we cannot see a suggestion to accommodate these deficiencies. (Pages 5.14-6 and 5.14-13)

6) During the construction time for the proposed project, huge hill development will have significant impact on air quality, noise pollution, traffic etc. being very close to a proposed development, my family is really worried about the quality of health, especially since I have a 7-year-old kid affected by Asthma.

I13-1
Cont.

I13-2

I13-3

I13-4

I13-5

I13-6

I13-7

I13-8

I13-9

I13-10

I13-5

increased mobility and recreational opportunities for pedestrians and bicyclists on the project site. The project would also implement **MM-TRA-1**, which includes vehicle miles traveled reduction measures, including the provision of on-site bicycle repair stations and bicycle parking spaces. These proposed facilities are not required as upgrades to the existing bicycle facilities, which are adequate to support anticipated bicycle demand of the proposed project. However, development of new bicycle facilities on the project site would occur as part of the proposed project to provide greater internal circulation.

Proposed roadway improvements are also discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Infrastructure as related to public utilities is discussed in Section 5.15, Public Utilities. As discussed therein and in Section 5.13, Population and Housing, the project is consistent with local and statewide goals relating to the provision of new housing and can be adequately served by existing infrastructure with mitigation incorporated. Public utilities impacts were determined to be less significant with mitigation incorporated. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.

- I13-6** Refer to **Master Response 9** and **Response to Comment I13-5**.
- I13-7** Refer to **Master Response 2** regarding landform alteration. The comment addresses a subject area, which received analysis in the Draft EIR.
- I13-8** Alteration to air movement was discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Impacts related to substantial alterations of air movement were determined to be less than significant. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.
- Regarding the 30-foot retaining wall, as stated in Section 5.17, Visual Effects and Neighborhood Character, where needed for hillside development at these locations, the project would incorporate retaining walls. However, per the Design Guidelines, use of retaining walls shall be minimized, wherever possible. For example, proposed buildings sited at the bottom of a slope would be set back enough to allow for adequate landscaping, pedestrian paths, and minimal retaining walls to soften the impact of the slope to homes. This approach would reduce the need for relatively high retaining walls. Further, proposed buildings sited at the top of a slope would be set back enough to allow for stoops, porches, landscaping, garden walls, and planters to soften the transition in slope.

The potential for high retaining walls would also be reduced through compliance with San Diego Municipal Code Section 142.0340. Specifically, Section 142.0340 permits the construction of two retaining walls with a maximum height of 6 feet each in the required side and rear yard if the two retaining walls are separated by a minimum horizontal distance equal to the height of the upper wall. ~~In addition, the project would not include any walls that would exceed 50 feet in length.~~ Per the Design Guidelines, garden walls would also be utilized throughout the project site to help screen mechanical equipment, garages, maintenance areas, and utilities so that these are not exposed to view from the street, major walkways, or residences within the development. The design of these walls, as well as the materials used, would be consistent with the overall project's design, and fence and wall color would be compatible with the design and color of the project.

I13-9 The project would be developed in phases, over an estimated four-year period. Additional construction and phasing information ~~are~~ is provided in Chapter 3, Project Description, of the Draft EIR. Traffic is discussed in Section 5.2, Transportation/Circulation, of Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I13-10 The project would be developed in phases, over an estimated four-year period. Additional construction and phasing information are provided in Chapter 3, Project Description, of the Draft EIR. Traffic is discussed in

Section 5.2, Transportation, of Draft EIR. Transportation /circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Noise is discussed in Section 5.11, Noise; of the Draft EIR. Noise impacts, including from construction, were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Air pollution-related impacts are discussed in Section 5.3, Air Quality and Odor, and impacts were determined to be less than significant, including during construction of the project. Also refer to **Master Response 7** with regard to air quality. The comment addresses subject areas, which received analysis in the Draft EIR.

7) Destruction of community character: We bought our home under the assumption that open space and green space would be a prominent feature of our community. We thought that the topographic character of the site will be retained with natural open space and landscaping. As we understand these are regulated by an HOA (House Owners Association). The proposed project requires a General Plan Amendment, Community Plan Amendment, Rezone, Master Planned Development Plan, Site Development Permit for Environmentally Sensitive Lands, and Vesting Tentative Map. Such major amendments and alterations in the proposed plans would be unnecessary if this project was remotely consistent with the community character of Carmel Mountain Ranch.

I13-11

8) Loss of the open space and parkland: As of now, The project site is designated Park, Open Space, and Recreation in the General Plan. EIR makes it seem like the Project is providing 112 acres of open space and parkland. In reality, the Project would result in the reduction of 52 acres of open space.

I13-12

9) The EIR acknowledges that the Project is in a Very High Fire Hazard Severity Zone

I13-13

10) Increased evacuation risk: In the event of a wildfire, evacuation will be already very difficult. We can see the morning and evening traffic and during evacuation, the situation will be more severe. Adding 1200 more houses could easily lead to fatalities, unless the city improves the transportation infrastructure.

I13-14

11) Creation of more sprawl housing: We understand the need for more housing. The EIR states: "the proposed project would introduce a population beyond what is planned for the project site." The 1200 proposed homes is excessive resulting in reduced quality community character, crowding, high vehicles miles travelled. This is one of the largest sprawl developments in the past several decades in San Diego and should require great scrutiny.

We are strongly urging the rejection of this project in its current form. A substantially downsized project (by 75%) or the no project alternative should be approved.

I13-15

We believe this project will result in the destruction of community character, loss of open space and parkland, increased wildfire risk, elevated evacuation risk, creation of more sprawl housing, massive increases in greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. The Project presents a number of unmitigable environmental impacts.

Respectfully Yours,

Harish Pillai and Family
13763 Royal Melbourne Sq.,
San Diego, CA 92128
hppillai@gmail.com
858 336 9108

--
Harish P Pillai

I13-11

Refer to **Response to Comment 02-11a** regarding parks and open space. Additionally, through implementation of Design Guidelines, which require that the project adapt to the topography of the site, the project would not result in a substantial change in the existing landform. Refer to **Master Response 2** regarding landform alteration and aesthetics impacts.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. Also refer to **Master Response 2**. Aesthetics impacts were determined to be less than significant. Finally, refer to **Master Response 1**, regarding consistency with the City's General Plan or the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received extensive analysis in the Draft EIR.

I13-12

Refer to **Response to Comment 02-11a** regarding parks and open space.

I13-13

Emergency evacuation is discussed in Section 5.8, Health and Safety, and Section 5.19, Wildfire, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I13-14

Refer to **Master Response 1** regarding density. Refer to **Master Response 9** regarding population inducement.

I13-15

Refer to **Response to Comments I13-1** through **I13-14**. Additionally, refer to **Master Response 10** regarding alternatives.

Comment Letter I14

From: Eric Kahlen <kahleneric@gmail.com>
Sent: Tuesday, January 26, 2021 5:48 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Dissent project #652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Good day and I pray that you, your family/friends and coworkers are staying healthy during this crisis. But I do have a crisis to talk about that will crop back after we recover from this one. And that is Project # 653519 or the proposal that New Urban West has put forth regards a housing project of about 1200 units on the CMR Golf Course which sadly went out of business. I purchased our home (13783 Etude rd on Hole #13) 5 years ago as the location was well kept, picturesque, close to all shops, quiet and safe. We had a little boy and a baby girl on the way and loved these qualities. This was a perfect location for our growing family.

I recently was able to review New Urban West's plans and was totally shocked. I think I can speak for the majority of us in this development that was built around the golf course, that we are totally opposed to this and for the following:

- We have a large building in our backyards.
- There will be a noise pollution issue that is not there now. This will be particularly problematic during construction.
- Traffic density will severely increase in an area not designed to handle this increase. This will be particularly so on Eastbourne Rd. Also note that during the times of the beginning and end of school at the Elementary School on north side of Highland Ranch Rd, our section of Eastbourne becomes heavily trafficked with cars turning around to unload or load children attending that school.
- I feel safety to be impaired due to the increase in residents in these complexes both from a traffic and home security perspective.
- Our sewage and water systems were not planned for this increase. I also find it incredulous that with the lack of water resources in San Diego, how can the San Diego Government in all good consciences even consider more housing that requires more of our scarce resources.

- We all bought in this area with the mindset that our homes would increase in value which they did. I actually fear that the value of our homes with these large units in our backyard will lose \$100- 200K in value. I could easily go on further but will stop here. I highly urge that this Project Number 652519 proposal be voted down. Keep the existing community happy to be living here. I would venture a statement that New Urban West cares not one bit for this existing community. I also would say the same about the wealthy owner. I certainly hope that the San Diego Government does. Thank you very much for your time.

Jamie and Eric Kahlen

I14-1

I14-2

I14-3

I14-4

I14-5

I14-6

I14-7

I14-8

Response to Comment Letter I14

14 Jamie & Eric Kahlen
January 26, 2021

I14-1

The City acknowledges the comment as an introduction to comments that follow.

I14-2

Refer to **Master Response 1** regarding density.

I14-3

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses a subject area, which received analysis in the Draft EIR.

I14-4

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses a subject area, which received analysis in the Draft EIR.

I14-5

Traffic safety is discussed in Section 5.2, Transportation, of the Draft EIR. Safety-related transportation/circulation impacts were determined to be less than significant. The comment addresses a subject area, which received analysis in the Draft EIR.

I14-6

Traffic safety is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Safety-related transportation/circulation impacts were determined to be less than significant. The comment addresses a subject area, which received analysis in the Draft EIR.

- I14-7** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.
- I14-8** Comment noted.

Comment Letter I15

From: Jeanne Preves <jeanne@mac.com>
Sent: Wednesday, January 27, 2021 11:38 AM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mt Ranch Golf Course Project

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

THIS IS A RIDICULOUS PROJECT ..
Streets and freeways jammed now!
Took away Golf course now adding insult
to injury of property value and living conditions having low income and less parking on residential streets will drive down
our quality of life!

Shame on the city !
Why can't the voters vote on this instead of it being pushed in our faces.

Do not be the typical government and not give us a say ...

OUTRAGEOUS!
WE THE PEOPLE COUNT !!!

Jeanne Lamon Preves
Property owner
Waterfield Laurels
Carmel Mt Ranch
1st development built

619-665-7731

>> Please excuse typos. Sent from my iPhone.

I15-1

Response to Comment Letter I15
15 Jeanne Preves
January 27, 2021

I15-1

Traffic is discussed in Section 5.2, Transportation/ Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses a subject area, which received analysis in the Draft EIR.

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Comment Letter I16

From: Jennifer Singer <singerjenn@gmail.com>
Sent: Wednesday, January 27, 2021 1:26 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom it May Concern:

My name is Jennifer Singer, the owner of 14448 N Church Square, San Diego, CA 92128, and I am writing to let you know I strongly oppose the development of The Trails at CMR.

CMR is unable to support the additional volume of residents the project will bring to the area. Local shopping centers are already packed from morning to evening (even outside of COVID-times) with just the current residents, so much so that I drive out of my way, 5 miles, to a grocery store that is less crowded. Traffic is heavy on weekdays, and doubles on weekends.

However, my biggest concern is the impact on schools. As a single mother of a 3 year old, I bought my home in part because it was located in PUSD. Sadly, I have learned that the schools, in particular Highland Ranch Elementary ("HRE"), are barely able to support the students they have. HRE is old, the paint is falling off, and the buildings need repairs. Technology is outdated and needs updating. Adding so many additional children to the area will put immeasurable additional stress on the school system that supports the area.

While I'd prefer the development never be built, I simply cannot understand how the city and planning boards could approve such a development without forcing the developer to build new infrastructure; schools, roads, public parks/trails, gas stations and other necessary shopping centers and stores to help support so many additional residents.

I am imploring you to not approve this project. CMR residents should have a real say in what happens to so much of the land that surrounds their homes that has essentially been green space for 35 years.

Thank you,
Jennifer
818-521-9532

Response to Comment Letter I16

16 Jennifer Singer
January 27, 2021

I16-1 The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

I16-2 Refer to **Master Response 1** regarding density.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the recently approved General Plan's Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.

I16-3 Impacts to schools were addressed in Section 5.14, Public Services and Facilities, and impacts were determined to be less than significant. Refer to **Master Response 6**. The comment addresses a subject area, which received analysis in the Draft EIR.

I16-4 Infrastructure as related to public utilities is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated.

Schools and parks are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Refer to **Master Response 6** and **Response to Comment O2-11a**. Impacts to schools and parks were determined to be less than significant.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Finally, to clarify for the commenter, the project would include publicly accessible parks and trails. The comment addresses subject areas, which received analysis in the Draft EIR.

I16-5 Comment noted.

Comment Letter I17

From: Jessica Nguyen <jessicanguyenhs@gmail.com>
Sent: Wednesday, January 27, 2021 4:03 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mtn Ranch RCA Devt.

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I do not approve of the project. The density will greatly impact the community.

I17-1



<https://www.youtube.com/watch?v=F1ehPIRtaX8>

2015 Pinnacle Award (Top 3 Agent/Broker in office)
2017 Two Diamond Award at HomeSmart International
2017 Circle of Excellence Top 5% in San Diego County
2018 Circle of Excellence Top 5% in San Diego County
2018 Diamond Award at HomeSmart International
2018 HomeSmart Realty West Top Producer
2018 Smart Property Hero Award
2018 SDAR Broker Of The Year Award: HomeSmart West Brokerage
2019 Circle Of Excellence Top 5% in San Diego County
2019 HomeSmart Realty West Top Producer
2020 Circle Of Excellence Top 5% in San Diego County
Premier 5 Stars Zillow Agent



5-star Reviews on Google:

<https://business.google.com/reviews/1/01365021666634618598>

5-star Reviews on Yelp:

<https://www.yelp.com/biz/jessica-nguyen-homesmart-realty-san-diego>

5-star reviews on Zillow.

<http://www.zillow.com/profile/JessicaNguyenRealtor>

www.JessicaNguyenSanDiego.com

We are looking for real estate professionals to join our growing brokerage. We have 800+ agents in San Diego and over 20,000+ agents nationwide. Let me know if you are looking for a change.

Response to Comment Letter I17

17 Jessica Nguyen
January 27, 2021

I17-1

Refer to **Master Response 1** regarding density.

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Comment Letter I18

-----Original Message-----
 From: Jules Hayashi <jules14hayashi@gmail.com>
 Sent: Wednesday, January 27, 2021 10:25 PM
 To: DSD EAS <DSEAS@sanidiego.gov>
 Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To whom it may concern,

My name is Jules Hayashi, I am 22 years old and I have lived my entire life in Carmel Mountain Ranch. My parents have lived there for 35+ years, back when it was a model home! I have always loved our community, the neighborhood, and the golf course in our backyard. I am reaching out to inform you of my concerns with implementing 1,200 multi family units to be constructed on the closed golf course.

There have been many issues regarding the traffic and the emergency preparedness if this were to be approved. Furthermore, my family enjoys the greenery in our backyard and the quiet that helps define our humble community. We are not opposed to developments in our neighborhood and welcoming new neighbors, but we want it to be in an environmentally-friendly fashion while respecting the current residents. The Environmental Impact Report concluded many substantial environmental impacts on the community. Some examples are that this project is not compatible with existing homes, only 10% of projects assist disadvantaged groups, and the trail proposals do not meet proposed uses and will create other problems.

I am a firm believer that there is a solution that can include more housing, more accessibility, and more parks and trails that will be met with less resistance among the current residents of Carmel Mountain Ranch.

Thank you for your time,
 Jules Hayashi

I18-1

I18-2

I18-3

I18-4

Response to Comment Letter I18

18 Jules Hayashi

January 27, 2021

I18-1

The City acknowledges the comment as an introduction to comments that follow.

I18-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Emergency preparedness is discussed in Section 5.8, Health and Safety, and Section 5.19, Wildfire, of the Draft EIR. Emergency preparedness-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I18-3

Regarding disadvantaged groups, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Nonetheless, the project would provide 180 affordable units at completion.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. Refer to **Master Responses 1** and **2**. The Draft EIR determined the project's impacts would be considered less than significant. Also, refer to **Master Response 1** regarding General Plan and Community Plan consistency as well as Table 5.1-2 and Table 5.1-

3 of the Draft EIR for further discussion pertaining to consistency with applicable land use plans and policies. The comment addresses subject areas, which received analysis in the Draft EIR.

I18-4 Comment noted.

Comment Letter I19

From: Karen Mullen <karen@sdmag.com>
Sent: Wednesday, January 27, 2021 8:03 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch - Project No 652519

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Please put me down as strongly opposed to the Trails at Carmel Mountain Ranch project. I have lived in Carmel Mountain for 20 years and feel the planned 1,200 additional units would increase traffic in our already congested streets and create more parking problems in the community.

What a shame it is that our beautiful community's image has been tarnished by chainlink fencing as a result of the closure of the Carmel Mountain golf course. Yes, something needs to be done to restore the community's image, but adding more housing is not the answer.

If you have any questions, please feel free to contact me.

Sincerely,

Karen Mullen
 Associate Publisher

707 Broadway, Suite 1100
 San Diego, CA 92101

619-744-0525 (office)
 619-987-3945 (mobile)

I19-1

I19-2

Response to Comment Letter I19

19 Karen Mullen
 January 27, 2021

I19-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

I19-2

Comment noted.

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Comment Letter I20

From: Mark Nicholson <nichmark@hotmail.com>
Sent: Tuesday, January 26, 2021 9:55 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] Carmel Mountain Ranch Golf Course

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To: E. Shearer-Nguyen

Please protect our neighborhood.

The deliberate lack of maintenance to the golf course has negatively impacted our community. It was sad to see the once beautiful golf course now a brown, unsightly fire hazard. We already have open space with Black Mountain to the west, Van Dam Peak hiking trails are south across Ted Williams Pkwy in Sabre Springs. We need the golf course restored to provide recreational diversity to the community.

We cannot trade further residential development for all the traffic that'll be coming westbound out of the Poway area, due to the new apartment complexes they're currently building by the Poway library & park, it's going to be chaotic with everyone trying to get onto the 15 & 56.

Sincerely,

Mark E. Nicholson, PsyD.
10460 Rancho Carmel Dr.
San Diego, CA 92128
h 858.673.5984
c 619.318.1507
<http://www.EffectiveOrganizationalChange.com>

I20-1

I20-2

Response to Comment Letter I20

20 Mark Nicholson
January 26, 2021

I20-1

Comment noted.

I20-2

Traffic is discussed in Section 5.2, Transportation/Circulation, and Chapter 6, Cumulative Effects, of the Draft EIR. Transportation/circulation impacts and cumulative transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

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Comment Letter I21

From: Michael Collins <dococc@gmail.com>
Sent: Wednesday, January 27, 2021 7:49 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: Michael Collins <dococc@gmail.com>; Leticia Lopez <letyplopez@yahoo.com>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To whom it may concern,

My wife and I are homeowners who recently moved to Carmel Mountain Ranch. Please accept this communication as our strong, formal OPPOSITION to this proposed project. We have grave concerns that the proposed project will cause significant traffic congestion in our neighborhood which will then pose a threat to our family's safety, especially during fire season. We also have concerns that the increased population density will result in noise pollution, environmental damage, and higher crime rates that will degrade our quality of life and place unnecessary and dangerous strains on our already burdened police, firefighters, EMTs and other first responders. We strongly believe that there are many other viable alternatives and solutions to providing affordable housing in San Diego. Our community needs more parks and open spaces, not more noise and congestion. Please do not allow this project to move forward.

Sincerely,

Dr. Michael Collins and Professor Leticia Lopez

Sent from my iPhone

I21-1
I21-2
I21-3

Response to Comment Letter I21
21 Michael Collins & Leticia Lopez
January 27, 2021

I21-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Wildfire hazards are discussed in Section 5.19, Wildfire, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I21-2

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the recently approved Update to the General Plan's Housing Element.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Police and fire protection services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police and fire protection services and facilities were determined to be less than significant.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I21-3 Refer to **Response to Comment 02-11a** regarding parks and open space.

Comment Letter I22

Response to Comment Letter I22
22 Michael Yim
January 27, 2021

-----Original Message-----
From: Mike Yim <michaelhyim@gmail.com>
Sent: Tuesday, January 26, 2021 12:36 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] I vote NO to Trails at CMR

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,

I am a resident of the Walden community. I have read through the Environmental Impact Report and am voting NO to the Trails at CMR project. It is a step in the wrong direction for the community and jeopardizes the quality of life for current residents. Thank you.

Michael Yim

General Project Information:
□ Project Name: Trails at Carmel Mountain Ranch □ Project No. 652519 / SCH No. 2020039006 □ Community Plan Area: Carmel Mountain Ranch □ Council District: 5

Sent from my iPhone

I22-1 Comment noted.

I22-1

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Comment Letter I23

Response to Comment Letter I23

23 Paul Jamason
January 25, 2021

From: paul jamason <pjamason@gmail.com>
Sent: Monday, January 25, 2021 12:35 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: PLN Planning <Planning@sanidiego.gov>
Subject: [EXTERNAL] support for trails at carmel mountain ranch project

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi, I'd like to voice my support for the Trails at Carmel Mountain Ranch project. Our city desperately needs more market-rate and affordable housing, and the Trails helps to provide this.

I would like to address some of the absurd criticisms of this project from Carmel Mountain United and the Carmel Mountain Ranch Sabre Springs Community Council (<https://www.10news.com/news/local-news/public-can-now-comment-on-trails-at-carmel-mountain-ranch-development-project>):

"It's a development that's in the wrong place at the wrong time."

Our region has under-built housing for decades and is in dire need of tens of thousand of housing units, immediately. Are the members of Carmel Mountain United waiting for their soaring property values to triple or

I23-1

Comment noted.

I23-1

quadruple *again* (due to limited housing supply) before they will allow housing?

For many of these homeowners, it was "right time" to build housing in CMR in the 1980s and 1990s when they needed it - but not for others now?

"They're taking old data and ideas that frankly didn't work (in LA), and they're trying to pave over our precious open space."

The former golf course was not "open space", it was a private course open only to paying members. This project provides eight acres of *public* parks, 30 acres of *actual* open space, and six miles of pedestrian and bicycle trails. The statement is laughably false and calls into question the credibility of Carmel Mountain United.

"It would be better for the neighborhood to redevelop abandoned retail or office space into housing, especially since more stores and businesses are closing during the coronavirus pandemic."

Where are all of these abandoned retail and office centers in Carmel Mountain Ranch? Are they referring to the abandoned MTS parking garage, where they oppose a mere 50-unit multi-family housing project? (<https://www.10news.com/news/local-news/san-diego-news/carmel-mountain-ranch-community-mounts-final-effort-against-new-apartment-complex>).

These "abandoned" retail and office centers don't exist. If they did, they would go up for sale - and the planning group would oppose rezoning them as mixed-use or residential.

""This is a real draconian kind of infill project," says CMRSSCC Chair Eric Edelman."

How is adding housing to a residential area "draconian"? How is it "draconian" to provide more housing supply during a housing crisis?

As a realtor, doesn't Mr. Edelman have a conflict of interest here? By limiting housing supply, he helps push property values up further, and enjoys larger commissions on each sale as a result. Edelman appears to be Carmel Mountain Ranch's version of Bay Park's anti-development realtor, James Lamattery (Raise the Balloon).

"We would like this project to at least attempt to retain the character of what Carmel Mountain Ranch is."

Saving community "character" is often a thinly-veiled reference to keeping lower-income residents and communities of color out of the community, by preventing multi-family housing (<https://www.rewire.org/how-discussions-of-neighborhood-character-reinforce-structural-racism/>). Single family zoning is today's redlining. Yet Carmel Mountain United and the Carmel Mountain Ranch Sabre Springs Community Council seek to perpetuate these inequities with their opposition to multi-family housing, at both The Trails and Alante.

Given our housing crisis, and the systemic racism that we have witnessed in this country over the past several years, we should acknowledge and call out the statements of groups like CMU/CMRSSCC - and strive to overcome them. Their actions are self-interested and classist at best, and our city deserves better.

Thank you,
Paul Jamason

I23-1
Cont.

Comment Letter I24

From: Sassan Shahrokhinia <shahrokhinia@gmail.com>
Sent: Wednesday, January 27, 2021 10:55 AM
To: DSD EAS <DSEAS@sanidiego.gov>; Sassan Shahrokhinia <shahrokhinia@gmail.com>
Subject: [EXTERNAL]

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear E. Shearer-Nguyen (Environmental Planner), I would like to go on record that myself and all of our neighbors strictly oppose the proposed development of the Carmel Mountain Ranch golf course by NSW development. This outrageous plan puts way too many units in this carefully planned community bringing in huge traffic problems and additional burdens on fire, police, schools and other city services without mitigation. I don't even see how one can mitigate road capacity and other services where no space exists in a mature planned community. Myself and all our neighbors fully support plans set forth by the CMR RCA. Thank you for your support.

Regards, Sassan Shahrokhinia
 11678 Chippenham Way, San Diego, CA 92128

1

I24-1

Response to Comment Letter I24
24 Sassan Shahrokhinia
January 27, 2021

I24-1

Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools, police services, and fire protection services are discussed in Section 5.14, Public Services and Facilities. Impacts to schools, police services, and fire protection services were determined to be less than significant. Refer to **Master Response 6** regarding schools. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I25

From: Shashanka Dontula <SDontula@nextivityinc.com>
Sent: Wednesday, January 27, 2021 3:02 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: shashanka.dontula@gmail.com <shashanka.dontula@gmail.com>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch (Project No. 652519) Public Comments

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi,

The proposed project is located within the City of San Diego (City), in the Carmel Mountain Ranch Community. The project proposes to redevelop the closed Carmel Mountain Ranch Country Club and associated 18-hole golf course. The project site is located west of the City of Poway, east of the community of Rancho Peñasquitos, north of the community of Sabre Springs, and south of the community of Rancho Bernardo (Figure 2-1, Regional Location). The project site is bounded by Ted Williams Parkway to the south, Carmel Mountain Road to the north, Interstate 15 (I-15) to the west, and the boundary with the City of Poway to the east. The project site consists of approximately 164.5 acres and currently has an address of 14050 Carmel Ridge Road, San Diego, California 92128.

I am resident and owner at 10474 Rancho Carmel Dr, I **would object** to any new construction in the above location for the below reasons:

1. Increase in road traffic on "Rancho Carmel Drive" on otherwise a safe road
The increased traffic has multiple impacts including more road accidents, more vigilance is required, parents will have immense emotional trauma to let older kids walk to the closest shopping strip.
2. Fear of loosing the community we built and relationships we established
Building a new community will force the CMRR HOA to increase vigilance which will increase the HOA fee for all residents. This can let the existing residents to vacate the location.
3. Kids growth impact
I am always an open advocate of larger open greener spaces can impact positively for the kids growth. The fresh air, the greener grass and the open fields will motivate any kids to bring the best in them both physically and emotionally. I don't want to take it away.
4. No more strolls
Building a new community will deter existing community from taking small strolls across the community due to increase in traffic, people and no open fields.
5. No Wildlife, No smiles
 - a. I have seen the open fields are home to several natural habitats including squirrels, rabbits and others. The kids enjoy a lot looking at these amazing creatures. This can impact there growth.

I would urge City of San Diego to consider my above cases as severely impact the community of CMRR and reject the proposal of any new or proposed constructions.

Thanking You.

Regards,
Shashanka.D
10474 Rancho Carmel Dr,
Shashanka.dontula@gmail.com

Response to Comment Letter I25

25 Shashanka Dontula

January 27, 2021

I25-1

The comment restates information contained in the Draft EIR regarding the project location and acreage and does not raise an environmental issue nor does It raise issue regarding the adequacy of the Draft EIR. Therefore, no further response is required.

I25-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations, including along Rancho Carmel Drive, were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses a subject area, which received analysis in the Draft EIR.

I25-3

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical

environmental impact. Property value and quality of life are not physical changes to the environment.

I25-4 Refer to **Response to Comment 02-11a** regarding parks and open space.

I25-5 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Additionally, the project would include a trail system that would circulate throughout the project site to provide increased mobility and recreational opportunities for pedestrians and bicyclists. Refer to **Response to Comment 02-11a** regarding parks and open space. The comment addresses subject areas, which received analysis in the Draft EIR.

I25-6 Wildlife is discussed in Section 5.4, Biological Resources, of the Draft EIR. Biological resource impacts were determined to be less than significant with mitigation incorporated. The comment addresses a subject area, which received analysis in the Draft EIR.

I25-7 Comment noted.

Comment Letter I26

From: iamspecialized09 <iamspecialized09@gmail.com>
Sent: Wednesday, January 27, 2021 12:52 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch, Project No. 652519 / SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

I live in Carmel Mountain Ranch and am voting against (NO) to the Trails at Carmel Mountain Ranch. I read through the material and believe the project will devalue the existing homes in the community and will also decrease the quality of life for existing families.

Steve Anderberg

I26-1

Response to Comment Letter I26
26 Steve Anderberg
January 27, 2021

I26-1

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

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Comment Letter I27

From: Thomas Peng <thomas.peng82@gmail.com>
Sent: Wednesday, January 27, 2021 4:57 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Concerns on Trails at Carmel Mountain Ranch / Project No. 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern:

I have a concern on the project Trails at Carmel Mountain Ranch (project no. 652519).

Currently, the streets in our community around Highland Ranch Elementary School become very crowded during the school drop-off and pick-up hours. The planned type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other issues for our community.

Thanks for your consideration.

Yingjie Peng
 12168 Waverly Downs Ln, San Diego, CA 92128

I27-1

Response to Comment Letter I27
27 Thomas/Yingjie Peng
January 27, 2021

I27-1

Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

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From: Viktoria <viktoria858@gmail.com>
Sent: Wednesday, January 27, 2021 11:10 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] CMR golf course development

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

I am writing to voice my thoughts on the why the city should not approve the build of 1200 units on the CMR golf course. This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other issues for our community. Please vote no.

Thank you,
Viktoria

Comment Letter I28

Response to Comment Letter I28
28 Viktoria
January 27, 2021

I28-1

Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

I28-1

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Comment Letter I29

From: Stuart Turner <swturner01@gmail.com>
Sent: Saturday, January 16, 2021 10:45 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Support: The Trails at Carmel Mountain Ranch, Project #: 652519 / SCH #: 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

We are in a housing crisis. Please don't force this project to go through endless bad faith studies that do nothing but increase cost to new homeowners.

Please either approve as-is or increase the allowed density. Same for whatever they want to build across the freeway on the other dead golf course too.

Stuart Turner
11011 Via Brescia, San Diego, CA 92129

I29-1

Response to Comment Letter I29
29 Stuart Turner
January 16, 2021

Comment noted.

I29-1

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Comment Letter I30

From: jmerry <jmerry@san.rr.com>
 Sent: Wednesday, January 27, 2021 10:43 AM
 To: DSD EAS <DSDEAS@sanidiego.gov>
 Cc: Troy Daum <troy@wealthanalytics.com>
 Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To DSDEAS:

I am a 25-year resident of Carmel Mountain Ranch. I love this place, this community, the home where I live.

The Trails at Carmel Mountain Ranch will most certainly lead to an increase of traffic in the area, which has already become quite congested. It will present a greater fire risk to the community and pose serious issues in the event of any evacuations.

Given the projected 25% increase in the population, there will be added stress on our schools, libraries, and infrastructure...all of which raise much concern.

The environmental impact this immense infill project, with 1200 homes, will impose, needs to be carefully and thoughtfully considered, for the good of all.

Please hear our voices.

Judy Merry
 Carmel Mountain Ranch, San Diego

I30-1

I30-2

I30-3

I30-4

I30-5

Response to Comment Letter I30

30 Judy Merry
 January 27, 2021

I30-1

The City acknowledges the comment as an introduction to comments that follow.

I30-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, even with these mitigation measures the transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses a subject area, which received analysis in the Draft EIR.

I30-3

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses a subject area, which received analysis in the Draft EIR.

I30-4 Schools and libraries are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact to library facilities. Refer to **Master Response 6**.

Infrastructure, as related to public utilities, is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to public utility infrastructure were determined to be less than significant with mitigation incorporated.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. The comment addresses subject areas, which received analysis in the Draft EIR.

I30-5 Comment noted.

Comment Letter I31

From: Shubham Khandelwal <khandelwal_d_shubham@yahoo.com>
Sent: Wednesday, January 27, 2021 12:55 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Comments on EIR for Project no 652519, Project Name - Trails at Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi,

I would like to request for the following comments be added to the EIR for Project - Trails at Carmel Mountain Ranch, Project Number - 652519.

1. The report has not emphasized on the nature, scope and quantification of impacts of substantial dense population increase in the region on existing population, existing infrastructure (medical services, roads, utilities) thus directly affecting the life quality of not just existing population but also for biological and ecological balance.
2. The report has not considered the original ethos, spirit, objective and idea behind the existing community design and has not provided with any ways to achieve the same objectives with the proposed project, thus ignoring the change in the Community Charter.
3. The report has not accounted for the need for additional infrastructure (space and area for schools, hospitals, emergency services, groceries, shopping, parking etc) to support the substantial increase in the population proposed by the project. Report also fails to provide any alternatives for the same.

Thanks
Shubham Khandelwal

Response to Comment Letter I31

31 Shubham Khandelwal

January 27, 2021

I31-1

The City acknowledges the comment as an introduction to comments that follow.

I31-2

Refer to **Master Response 1** regarding density.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated. Infrastructure, as related to public utilities, is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to public utility infrastructure were determined to be less than significant with mitigation incorporated.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

Finally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical

change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I31-3 Consistency with neighborhood and community character is addressed in Section 5.17, Visual Effects and Neighborhood Character, in the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**, which provides further discussion pertaining to aesthetic impacts. Additionally, refer to **Master Response 1**, as well as Table 5.1-3 of the Draft EIR, for further discussion regarding Community Plan consistency.

I31-4 Refer to **Response to Comment I31-2** regarding infrastructure. Additionally, public services, including schools and emergency services, are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Public Services and Facilities impacts were determined to be significant and unavoidable due to the impact on library facilities. However, impacts to schools and emergency services were determined to be less than significant. Refer to **Master Response 6** regarding schools.

Regarding the alternatives analysis, refer to **Master Response 10**.

Comment Letter I32

From: cpiperdude <csnaismith@gmail.com>
Sent: Friday, January 29, 2021 1:30 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: EIR Public Comment - Project 652519 - Trails at Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom It May Concern:

This e-mail is being sent by me, Colin Naismith, on behalf of my father, Campbell Naismith. Please find attached in .pdf format public comments in the form of a letter sent by Campbell Naismith to Ms. E. Shearer-Nguyen regarding the Trails at Carmel Mountain Ranch, Project 652519.

Please let me know if there are any problems accessing the attached .pdf.

Thank you for your kind attention to this matter.

Sincerely,
Colin Naismith

I32-1

Response to Comment Letter I32
32 Colin & Campbell Naismith
January 29, 2021

I32-1 The City acknowledges the comment as an introduction to comments that follow, included in the attached letter.

Campbell Naismith – Homeowner / CMRRA HOA Member
14679 Carmel Ridge Road
San Diego, CA 92128
campbell.naismith@gmail.com

January 29, 2021

E. Shearer-Nguyen
Environmental Planner
City of San Diego Developmental Services Department
1222 First Avenue, MS 501
San Diego, CA 92101
DSDEAS@sanidiego.gov
Sent Via E-mail Only

Re: Trails at Carmel Mountain Ranch (Project No. 652519) – Public Comment on EIR

Dear Ms. Shearer-Nguyen:

This letter is being submitted as a public comment on the Environmental Impact Report (EIR) on the proposed project named the Trails at Carmel Mountain Ranch (the Project), Project No. 652519, as allowed under the California Environmental Quality Act (CEQA). The letter will illustrate the concerns that I, Campbell Naismith, as a homeowner and member of the public have regarding this new development that will significantly impact both myself and the community that I call home. For reference, I have lived in Carmel Mountain Ranch since 1988 and it has been a wonderful community to both live and grow a family in. The implementation of the Project and the called for creation of 1,200 new multi-family units will create significant negative impacts on the community in several ways.

A) Significant Impacts on Homeowner and Community:

1) Transportation / Traffic Significant Impacts:

In the EIR provided, the transportation impact analysis indicates that the Project would increase daily trips within the community by 8,282 trips per day as measured by the City of San Diego's Trip Generation Manual. The EIR does not directly provide mitigation that directly addresses the significant impact that these additional daily trips would have on the roads and traffic in the community. Already, some of the roads in our community and surrounding area are already crumbling under current impacts of traffic in the area. An example of the already significant impacts the community has on the roads would be the 11000 block of World Trade Drive San Diego, CA 92128 which has significant potholes and erosion in the asphalt. Additionally, that very same commercial area, nearly adjacent to the existing and newly proposed project, already suffers significant traffic impacts with a nearly full parking lot and constant traffic during most ordinary business hours. While the EIR does make mention of bike paths, bike repair

I32-2

The City acknowledges the comment as an introduction to comments that follow.

I32-3

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. As discussed therein, the threshold for significance of project-generated traffic is vehicle miles traveled per capita. The project would include **MM-TRA-1**, which would require implementation of reduction measures to reduce project vehicle miles traveled. However, the project would result in a significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**.

I32-4

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Transportation/circulation was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

In regard to bicycle paths and facilities, all the planned bicycle facilities per the Community Plan and Bicycle Master Plan have been constructed. However, the project would include a trail system that would circulate throughout the project site to provide mobility and recreational opportunities for pedestrians and bicyclists. The proposed trail system is part of the project and therefore, was analyzed as a project component throughout the Draft EIR where applicable to the environmental issue.

I32-2

I32-3

I32-4

stations, and the use of pre-existing concrete paths there is no mention of any additional capacity to residential streets or of improving the currently existing roadway infrastructure. While these bikeways do create opportunity for recreation, they do not sufficiently address the increased traffic for a community that is very much commuter based for both work and shopping.

1) The "Highland Ranch Rush"

As a longtime resident of Carmel Ridge Road and whose son attended Highland Ranch Elementary School, I can attest to an extremely high level of traffic I can only describe as the "Highland Ranch Rush." Highland Ranch Elementary School is located on Eastbourne Drive which eventually transforms itself into Carmel Ridge Road. On every weekday during the school year, the traffic on these roads is greatly impacted by parents arriving and departing from the school with their children both at the start and end of the school day. Especially in the morning, it can take upwards of five minutes or more to back out of my driveway as the traffic to and from Highland Ranch Elementary School is so dense and unrelenting. As for travelling to my own house, I know not to use the Eastbourne Drive road, one of only two access points to drive to my house, during the morning and afternoon rush unless I wish to sit in traffic for upwards of ten minutes or more. Adding additional motor vehicles to this "rush" would pose a significant impact on an already impacted area, creating further traffic issues that impede by ability to go to and from my very own doorstep.

In conclusion, the EIR does not provide mitigation sufficient to address the proposed increased daily trips in an area already significantly impacted.

2) Population / Housing Significant Impacts:

In the Project description, the goal of the Project is to add 1,200 new multi-family units. In a 2016 Demographic and Socioeconomic Estimates Community Planning Area Carmel Mountain Ranch report¹, generated by the San Diego Association of Governments (SANDAG), SANDAG estimated that, as of 2016, there were a total of 5,072 housing units in the community. An addition of 1,200 housing units to the existing 5,072 housing units would be an approximately twenty five percent increase in overall housing density in the community. Additionally, each of these new household units would proportionally increase the population and significantly impact the use and enjoyment of the community by the existing population.

Also, the Project is currently joined by another, already being built development directly across the highway on Carmel Mountain Road (Pacific Village: The Pavilion²). All of the new residents at those household units will also utilize the same retail shopping area that the Project proposes to take advantage of. Parking in these areas is already at capacity and current residents have trouble finding parking as it is. The creation of an additional 1,200 household units and their incumbent populations poses a significant impact on an already significantly impacted area.

¹ https://datasurfer.sandag.org/download/sandag_estimate_2016_cpa_carmel-mountain-ranch.pdf

² <https://www.lennar.com/New-Homes/California/San-Diego/San-Diego/Pacific-Village/The-Pavilion>

I32-4
Cont.

I32-5

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I32-7

I32-5

Refer to **Master Response 3** and **Response to Comment I32-3**. Transportation/circulation impacts were determined to be significant and unavoidable.

I32-6

Population and housing growth are discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

I32-7

Consistent with Section 15130 of the CEQA Guidelines, the analysis of cumulative impacts is provided in Chapter 6, Cumulative Effects, of the Draft EIR. The cumulative analysis takes into account the Pacific Village project. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Refer to **Master Response 3** regarding parking. The comment addresses subject areas, which received analysis in the Draft EIR.

In conclusion, the EIR does not provide mitigation sufficient to address the significant proposed population and housing impacts in the community.

3) Public Services Significant Impacts – Fire:

As a community that, with all to increasing frequency, faces the dangers of fire, fire safety is of paramount concern. As required by California Government Code § 51175 – 51189³, state law requires that all local jurisdictions identify very high fire hazard severity zones. Unfortunately, the southern portion of Carmel Mountain Ranch⁴ is contained within one of these aforementioned zones. Much of the surrounding area is likewise contained within these zones. The addition of 1,200 multifamily housing units and their occupants, with no mitigation or new ways to evacuate this very high fire hazard severity zone during a fire disaster is not only dangerous but may also be viewed as negligent. Recent history in San Diego and the state of California have proven time and again the need for clear evacuation routes is paramount to avoid potentially deadly outcomes to human life due to traffic jams caused by over populated areas with singular evacuation routes. In fact, two separate times in the last two decades my household was ordered to evacuate due to fires and both times we had only one road to evacuate to. Both times, the roads were significantly impacted with near standstill traffic.

In conclusion, the EIR does not provide mitigation sufficient to address the significant impacts that the Project will have on Public Services, with special respect to fire.

4) Aesthetics Significant Impacts

Under the current Community Plan, the former golf course in Carmel Mountain Ranch was used to separate neighborhoods with green space and provide a visual amenity to the residents. In fact, homeowners who purchased houses on my street, Carmel Ridge Road, paid more money for their homes if they were backed up to the golf course. Unfortunately, for those homeowners their homes are now backed up to often overgrown untreated landscaping. However, infilling these spaces with multi-family buildings, several of which are three stories, would destroy the character of our community which is predominantly two-story single-family homes and is not the solution. Significantly, the project is also not permitted by the current Community Plan or existing zoning, which is AR1-1.

In Conclusion, this project would create significant impacts on the aesthetics of our community and violates the existing zoning provided for.

B) Conclusion of Significant Impacts to Community via Project

As discussed at length above, the Project will have significant impacts on the community and the currently existing mitigations, or lack thereof, in the EIR do not sufficiently address the

I32-7
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I32-8

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I32-10

I32-8

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, Section 5.14, Public Services, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Fire rescue services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to fire rescue services were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

I32-9

Aesthetics impacts are discussed in Section 5.17, Visual Effects and Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views. Also refer to **Master Response 1** regarding zoning and land use consistency.

I32-10

Refer to **Response to Comment I32-3** through **I32-9**.

³ <https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/govtcode.pdf>

⁴ <https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/maps/grid41.pdf>

traffic, population, fire, or aesthetic concerns. As a long-term homeowner in the community this community will suffer significant impacts that will have a negative impact on current residents if the Project were to go forward. Thank you for your kind attention to this matter. Don't sell us out.

Sincerely,

Campbell Naismith

I32-11

I32-11 Comment noted.

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Comment Letter I33

From: Jody Neiss <jomarie625@aol.com>
Sent: Thursday, January 28, 2021 2:09 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] EIR Concerns THE TRAILS AT Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Kindly read my concerns regarding Project Project Number 652519/SCH No. 2020039006 in the attached letter.

Thank you,
Jody Neiss
Carmel Mountain Ranch resident
13925 Royal Melbourne Square
San Diego. 92128

I33-1

Response to Comment Letter I33
33 Jody Neiss
January 28, 2021

The City acknowledges the comment as an introduction to comments that follow, included in the attached letter.

To Whom It May Concern:

The intent of this letter is to share my concerns regarding the EIR for the proposed New Urban West development called the "Trails at Carmel Mountain Ranch."
Project Number 652519/SCH No. 2020039006

The Transit Area Designation is misleading

The criteria for that designation is technically correct but not realistic. Much of the project is not within the Transit Priority Area (TPA). Only Units 5 and 6 are within walking distance of the Sabre Springs/Los Penasquitos Transit Station. That is a minority of the proposed population increase, and that assumes that residents of Units 5 and 6 work downtown and would walk to or use the transit station. The Sabre Springs/Los Penasquitos Transit Station is primarily a park and ride which is great for downtown workers. Commuters from North County and surrounding communities make great use of this if they work downtown. But it has very limited routes to other locations and no light rail is planned. There are no bus routes provided to other high employment areas such as Sorrento Mesa and Sorrento Valley. From personal experience, I can tell you that the 15 and 56 freeways are often at a crawl or standstill during rush hour in this area. The EIR report concludes that transportation impacts are unmitigatable. That is very concerning to me.

With the increased density of the development and the limited routes of the Transit Center, green house gases would be increased in this area, affecting air quality. And our already congested freeways and local roads would be even worse.

Wildfire

Increased density and traffic congestion would make evacuation due to wildfire more difficult. The EIR focuses on brush management and fails to focus on wind driven Santa Ana fires from the East. I vividly remember loading up my car and trying to get on Ted William's Parkway from Shoal Creek during the Witch Creek Fire in 2007. Luckily the fire did not affect Carmel Mountain Ranch, but we felt that we dodged a bullet with the Witch Creek Fire reaching into Rancho Bernardo just north of us and the Cedar Fire in 2003 destroying many homes in Scripps Ranch just to the south of us. Carmel Mountain Ranch is within a high severity fire zone. Trying to get out of side streets with all of the traffic coming from Poway is a frightening prospect. It was already difficult in 2007. **Reducing the density of this project in any way would help.**

Project Alternatives

The EIR Project Reduced Density Option doesn't make sense and deserves more consideration. With the impacts on traffic congestion, increased green house gases, increased fire risks, not to mention the reduction in open space, I **really urge you to reconsider a lower unit count option.**

If I understand it correctly, the EIR comes to the conclusion that since the reduced unit option (from 1,200 to 825) would not solve the significant and unavoidable impacts it makes sense to not consider this option due to the "slight" reduction in reduced population, housing and traffic and transportation impacts. That doesn't make sense. The reduced option would reduce the

I33-2

The City acknowledges the comment as an introduction to comments that follow.

I33-3

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. As noted by the commenter, the project would result in a significant and unavoidable transportation/circulation impact. Refer to **Master Response 3** regarding transportation/circulation and the transit priority area designation. Additionally, as mentioned in Section 11 of the Local Mobility Analysis (Draft EIR Appendix C), the project study area is served by MTS Routes 20, 944, 235, and 290. The project's location in a transit priority area matters for vehicle miles traveled mitigation through compliance with the City's "Complete Communities: Mobility Choices Program". The project follows requirements for Mobility Zone 2 (Transit Priority Area—TPA) because Mobility Zone 2 is defined as any premises located either partially or entirely in transit priority area. The comment addresses a subject area, which received analysis in the Draft EIR.

I33-4

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Refer to **Master Response 3** regarding traffic and congestion. Transportation/circulation impacts were determined to be significant and unavoidable.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Refer to **Master Response 7** regarding air quality and **Master Response 8** regarding greenhouse gas emissions. Air quality and greenhouse gas emissions

population from 3,180 people to 2,186. That represents a 31.4% reduction, which isn't slight. Further if the 825 unit option does not improve impacts would it not make more sense to evaluate options somewhere between 0 and 825 units?

Also, please consider as an alternative a **mixed use development to mitigate the loss of open space**. Open space should be treasured and we don't have a surplus of it in Carmel Mountain Ranch. We already are seeing increased availability in retail and office space in Carmel Mountain Ranch due to increased online-shopping and work from home due to COVID. The possibilities are present and deserve investigation before decimating open space. This project definitely reduces the open space in Carmel Mountain Ranch for residents. **Please take into account post-pandemic considerations and opportunities to repurpose commercial and retail space.**

In Conclusion

I am not against New Urban West's Trails at Carmel Mountain Ranch project. It is essential that we address the housing shortage and affordability problem in San Diego. I am just urging you to not approve it in its present form. Please consider reducing density and preserving more open space to mitigate the increase in greenhouse gases, traffic congestion, and wildfire risk. Please consider alternative projects as well (mixed use development) given new opportunities to think outside the box due to the pandemic. I implore you to not destroy the character, quality, and safety of our community when other options or modifications are possible that would allow the project to proceed with a better balance of density and open space.

Respectfully,
Jody Neiss
Carmel Mountain Ranch Resident
13925 Royal Melbourne Square
San Diego 92128

I33-6
Cont.

I33-7

I33-8

I33-5

impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I33-6

Refer to **Master Response 10** regarding alternatives.

I33-7

Refer to **Master Response 10** for a discussion pertaining to the alternatives selected for analysis within the Draft EIR. With regard to open space, refer to **Response to Comment O2-11a**.

I33-8

Comment noted.

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Comment Letter I34

From: M Blazak <mrbblazak@gmail.com>
Sent: Saturday, January 30, 2021 9:36 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: Troy@wealthanalytics.com <Troy@wealthanalytics.com>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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I strongly oppose this development for the reasons cited below. I respectfully ask consideration of the existing residents who do not want to see the degradation of their beloved neighborhood because of indiscriminate development. Proposed Project is Not Cohesive or Respectful of the Existing Community Project Objective 7, section ES.3 not met - The Trails at Carmel Mountain is not cohesive nor respectful of existing properties 1/25/2021 - Page 9 • The project is not cohesive in that it infills former golf fairways spread throughout the Carmel Mountain Ranch Community. • It is not cohesive in that the density and type of housing will stand out instead of blending in with the community. (please see the response to Objective #1) • The project is not respectful of existing properties as it is 100% multi-unit buildings, the buildings are all three and four stories tall, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing homes. Please see page 9 of the Design Guidelines for density and heights of the proposed buildings and page 14, Transitions, Buffers, Edges and Screening for buffers and circulation elements.

Sincerely,
Margaret Blascak, MPH

I34-1
I34-2
I34-3

Response to Comment Letter I34
34 Margaret Blascak
January 30, 2021

- I34-1 The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.
- I34-2 Comment noted.
- I34-3 Project bulk and scale are discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2.**

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Comment Letter I35

From: Jack Doxey <jfdoxey@gmail.com>
 Sent: Saturday, January 30, 2021 1:07 PM
 To: DSD EAS <DSDEAS@sanidiego.gov>
 Cc: Jack Doxey <jfdoxey@gmail.com>
 Subject: [EXTERNAL] Project name-The Trails at Carmel Mountain Ranch Project #652519/SCH No 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

My name is John Doxey and I am a resident of Carmel Mountain Ranch. I am not opposed to smart growth but the proposed project for the golf course is neither smart or reasonable.
 The traffic congestion will be horrific and in case of a wild fire we might die sitting in our cars trying to escape.

I am a senior citizen and suffer from a serious respiratory problem. Excavation of the site will go on for years and the pollution will adversely affect my health.
 Compounding the problem is the generation of greenhouse gases. Climate change is the number one priority in the world.

I'm surprised that this project got as far as it has. Everything appears to be in favor of the developer and an almost total disregard for the residents of Carmel Mountain.

Please closely read the Sierra Club Environmental Report. It echoes many of my concerns.

Sincerely John Doxey

I35-1

I35-2

I35-3

Response to Comment Letter I35

35 Jack Doxey
 January 30, 2021

I35-1

The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

I35-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Wildfire hazards and evacuation are discussed in Section 5.19, Wildfire and Section 5.8, Health and Safety, of the Draft EIR. Wildfire hazards and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I35-3

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Refer to **Master Response 7** regarding air quality and **Master Response 8** regarding greenhouse gas emissions. Air quality and greenhouse gas emissions impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I36

From: Jeff Lee <jlee404@gmail.com>
Sent: Sunday, January 31, 2021 11:47 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear San Diego City Council,

My name is **Hyun Sang Lee** who is living in "14218 Stoney Gate Pl, San Diego" and this email outlines the concerns of a resident who is living next to the unused golf course and would be directly affected by the Carmel Mountain Ranch Project. It has come to my attention that this project in its

I36-1

Response to Comment Letter I36

36 Jeff/Hyun Sang Lee
January 31, 2021

I36-1 The City acknowledges the comment as an introduction to comments that follow.

current form would violate a vast number of environmental issues and cause irreversible damage to the safety and health of the thousands living in this area.

I have compiled some of these violations below:

1. Proximity height of buildings near existing homes.

- According to section 5.1.3 of the Environmental Impact Report, this statement is used as justification to proceed with development: "In instances where maximum building height is greater than 40 feet, it is likely that differences in grade and topography would not result in a substantial visible difference between existing and proposed development."
- In the Vesting Tentative Map, most of the building pads are not only in close proximity as existing development--the homes of hundreds, if not thousands of families that have been living in this area for years-- but also close in elevation as the adjacent existing homes.
- It is important to note that 100% of the new development buildings are to be 3-4 stories with height and density much greater than the 2-story single family homes in the area.
- This point above goes into another statement in the EIR which incorrectly claims that the "aesthetic impacts resulting from a residential project on an infill site within a Transit Priority Area are not considered significant" and that "deviations requested would not affect any other environmental issue or sensitive resources" which "would not result in a physical impact on the environment".
- The increased density of buildings resulting from this project would cause the following: 164 acres of grass, dirt, plants, and land native to many wildlife--already an extreme rarity in this area and San Diego as a whole--turned into concrete and asphalt resulting

I36-1
Cont.

I36-2

I36-3

I36-4

I36-2

A discussion of the visual effects and neighborhood character related to the proposed bulk and height of the buildings can be found in Section 5.17, Visual Effects and Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I36-3

Refer to **Master Response 2** regarding aesthetics impacts. The Draft EIR determined the project's impacts would be considered less than significant. Additionally, the deviations being requested would not result in physical impacts on the environment because impacts associated with these deviations were analyzed in Section 5.1, Land Use, of the Draft EIR and impacts were determined to be less than significant.

I36-4

Refer to **Master Response 1** regarding density.

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated. Specifically, the project would not result in significant impacts to sensitive habitats, plant species, or wildlife species. Regarding open space, refer to **Response to Comment 02-11a**. The comment addresses subject areas, which received analysis in the Draft EIR.

in a disruption of cooling wind patterns. Furthermore, there will absolutely be an increase in traffic causing major noise disturbances.	I36-5	I36-5	Traffic is discussed in Section 5.2, Transportation/ <u>Circulation</u> , of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to Master Response 3 .
2. Privacy violations			
<ul style="list-style-type: none"> • Project objective 3, section ES.3 will not be accomplished if the development proceeds. 	I36-6		
<ul style="list-style-type: none"> • The majority of the project site must be preserved as open space in order to prevent the destruction of native vegetation, special-status plants, and sensitive habitat. Without the 100-foot buffer these things would be destroyed without being addressed 	I36-7		Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to Master Response 4 . The comment addresses subject areas, which received analysis in the Draft EIR.
<ul style="list-style-type: none"> • Furthermore, the lack of the 100-foot buffer raises concerns with the privacy of all surrounding homes. As previously mentioned in point 1, the lack of buffers combined with the height and proximity of new development would give people direct visual and auditory access to the privacy and comfort of families living in existing homes. As a qualitative reference, we are already able to see residents in their backyard across the entire golf course and hear construction and outdoors work at a disruptive level. 	I36-8	I36-6	Comment noted.
		I36-7	Refer to Response to Comment I36-4 .
<ul style="list-style-type: none"> • This violation to privacy opens up many opportunities to an increased crime rate if the City of San Diego allows the development to move forward. Lifestyle of entire families and individual family members can easily be observed and used to take advantage of. Breaking and entering, theft, robbery, murder, and rape. The list goes on and the possibilities are endless and this development moving forward without addressing all of these concerns will increase the probability and the rate at which these crimes occur. 	I36-9	I36-8	Regarding privacy, privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. The project would include setbacks from neighboring properties, as discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. Refer to Master Response 2 regarding aesthetics impacts and private views. The Draft EIR determined the project's impacts would be considered less than significant.
<ul style="list-style-type: none"> • With the hit of covid-19, many within my household along with other households have transitioned to work from home. Even after the pandemic passes, many are going to expect to continue to work from home and these kinds of violations to privacy and increase in disruptions will be a major issue that is irreversible. 	I36-10	I36-9	Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Lifestyle and crime are not physical changes to the environment.

- Lastly, the 100-foot buffers are absolutely needed for the health, safety, noise, security, and privacy issues created by the 100% publicly accessed trail.

I36-11

3. Public Recreation Area is Reduced.

- **Project Objective 5, section ES.3 will not be met.** According to this section, the development will create a wide range of active and passive public recreational opportunities above and beyond what is required by city regulations.

I36-12

- **The reality of the situation is an overall decrease in both parks and open spaces for Carmel Mountain Ranch.**

- New Urban West is planning on developing over 50% of the 164-acre golf course and it is imperative to note that Golf Courses are recognized as Parks and Recreational Open Space according to the City's General Plan.

I36-13

- The surrounding and preexisting community firmly stands behind wanting more parks and recreation due to the unique terrain and open space in Carmel Mountain Ranch. Those living here who will be directly impacted should have a say in how these spaces get developed. Additional playfields, passive park space, golf area, dog parks, and anything that will enhance the lives of those living here should be seriously considered first in lieu of development projects that will be disruptive for years and then continue to cause violations--many of which have been outlined in previous points and many of which we simply cannot foresee.

I36-14

My hope is that through this email, I am one of many voices that helps the City of San Diego see the real and pressing issues of allowing yet another development plan to bulldoze over what could be a beautiful area that brings a breath of freshness, joy, and excitement to the loyal, hardworking, and concerned residents of Carmel Mountain Ranch.

I36-15

Best Regards,

Hyun Sang Lee

I36-10

Comment noted. Refer to **Response to Comment I36-9**.

I36-11

Health and safety issues are discussed in Section 5.8, Health and Safety, of the Draft EIR. Noise is discussed in Section 5.11, Noise, of the Draft EIR. Additionally, health risks as pertaining to air quality are discussed in Section 5.3, Air Quality and Odor, of the Draft EIR, which included a Health Risk Assessment. Impacts related to health and safety and health risk from air quality were determined to be less than significant. Refer to **Master Response 7** regarding air quality.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Refer to **Response to Comment O2-7** regarding public safety. Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. The comment addresses subject areas, which received analysis in the Draft EIR.

I36-12

Regarding parks and open space, refer to **Response to Comment O2-11a**.

I36-13

Refer to **Master Response 1** regarding land use compatibility and General Plan consistency.

I36-14 Regarding parks and open space, refer to **Response to Comment O2-11a**. Regarding the City's park development process, refer to **Response to Comment O2-11b**.

I36-15 Comment noted.

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Comment Letter I37

From: Patrick Anamosa <janamosa@san.rr.com>
Sent: Sunday, January 31, 2021 4:21 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: The Trails at Carmel Mountain Ranch Project # 652519/SCH No 2020039006

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Please see attached letter.

Thank you,

John Patrick Anamosa
619-204-2494

Response to Comment Letter I37
37 John Patrick Anamosa
January 31, 2021

I37-1 The City acknowledges the comment.

I37-1

John P. Anamosa
14375 Seabridge Lane
San Diego, CA 92128

To: DSDEAS@Sandiego.gov

From: janamosa@san.rr.com

Project: The Trails at Carmel Mountain Ranch

Project # 652519/SCH No 2020039006

Date Feb 2, 2021

To Whom It May Concern:

After review of the DEIR and as a Senior citizen and 30+ year resident in Carmel Mountain Ranch, I'm concerned about the following issues:

1. What is the NUW Fire Evacuation plan during yearly Santa Ana winds with additional residents and their vehicles? Fire evacuation is especially concerning. During the 2007 fires it took a neighbor twenty minutes to get from Seabridge Lane to I-15. This is unacceptable. More units will only add to this problem. It is already very difficult to find parking at the local shopping centers. Adding more cars will only aggravate this problem.
2. What is the NUW plan to address the health risk issue during construction? The CMR community was built on the topography of the hillsides, not massive level pads the construction of which will create fugitive dust and exhaust fumes from excavation which can then lead to Valley Fever, emphysema, exacerbate COVID lung problems, and cause general cleanliness issues in homes.
3. What is the NUW plan to replace the unique open space of the "Spectacular 18-hole golf course" and "Fairway Views" with public parks, gardens, swimming pools, trails, recreation areas accessible to all residents including seniors?
4. What is the NUW plan to have similar type housing next to existing housing in order to blend seamlessly with the CMR community? The majority of our community are 2-story single family homes. Therefore, construction of 1200 condos, apartments, and town homes with multi-family and multi-story homes is totally inconsistent with the CMR community character. I am concerned that the heights of new construction will block the views of existing homes.

Vr,

John P. Anamosa

I37-2

I37-3

I37-4

I37-5

I37-6

I37-7

I37-2

Emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I37-3

Refer to **Master Response 3** regarding parking.

I37-4

Air quality, including fugitive dust, is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Section 5.3 also contains a discussion of the Health Risk Assessment prepared for the proposed project. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses a subject area, which received analysis in the Draft EIR.

I37-5

Refer to **Response to Comment 02-11a** regarding parks and open space. Refer to **Master Response 2** regarding private views.

I37-6

Refer to **Master Response 1** regarding density. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1** as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. The comment addresses subject areas, which received analysis in the Draft EIR.

- I37-7** Refer to **Master Response 2**, for more information on bulk, scale, and height, as well as Draft EIR Section 5.17, Visual Effects and Neighborhood Character. Also refer to **Master Response 2** regarding private views.

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Comment Letter I38

From: Alberto Fernandez <alberto.f.a@gmail.com>
Sent: Monday, February 1, 2021 7:23 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Miss E. Shearer-Nguyen,

I am writing to you in regards to the Trails at Carmel Mountain Ranch project proposal. I am the homeowner of a house directly adjacent to the old golf course. My view from the backyard and any of the north facing windows is of the beautiful open space that was the golf course. While I am not bothered that the golf course is no longer operational, I am deeply concerned over the various impacts stemming from the addition of 1,200 living units to this community. I fear that my home will lose value, all because of something that is out of my control. I work in the commercial construction industry as a project manager, and I know what kind of impact a 1,200 unit development will have on the neighborhood. The surrounding area will suffer long after construction is complete. There is simply not enough infrastructure to support the safe evacuation of 1,200 more families let alone the additional impact to traffic in the area. In regards to traffic, I fear San Diego will become as bad as Los Angeles without the concurrent improvement of our local roads and highways. This project does not address the increase of vehicles in the surrounding area adequately. There are far better locations for high density housing, closer to business parks where the bulk of San Diego's jobs are concentrated.

I urge you to lend more weight to the Sierra Club's letter. This letter reflects my opinion of the matter precisely. Above all, I am concerned that this high-density-housing development will reduce the quality of life of the surrounding area as well as compound the ability for the community to evacuate in the case of a wildfire or other emergency. I would support a more modest project consisting of far fewer single family homes. How does planning/development plan to address the shortcomings of the current proposal in regards to senate bill 375? The current proposal falls short of meeting the requirements. As more and more development continues in this great city, our parks and recreational areas diminish and they are pushed further and further away.

Sincerely,
 Alberto Fernandez-Arteaga

Response to Comment Letter I38

38 Alberto Fernandez-Arteaga

February 1, 2021

I38-1 Refer to **Master Response 2** regarding private views.

I38-2 Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not a physical change to the environment.

I38-3 Traffic was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** for additional information.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I38-4 Refer to **Master Response 1** regarding density. Refer to **Master Response 5** regarding wildfire and evacuation.

- I38-5** Parks and open space are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Refer to **Response to Comment O2-11a** regarding parks and open space. Refer to **Response to Comment O1-11** regarding SB 375 consistency. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I39

From: Ali Khodafar <alikhodafar@gmail.com>
Sent: Saturday, January 30, 2021 12:57 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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Greetings,

We have lived in CMR for the past 25 years at: 11622 Windcrest Lane and have really enjoyed every minute of it until we heard about this project.

Besides the obvious issues with building so many units in such a small community, such as noise, pollution, traffic etc. I just wanted to highlight how crowded our local strip malls and shops are even now, during a pandemic.

Try going to the UPS store during lunch time at the Rite Aide & Ralph's shopping center, just as an example. Most of the time, you can't find a single parking space even in the 20 minute parking spots. That's partially because of the extremely popular Mexican, sushi, and DQ restaurants and pet stores there. You will see the same problems in the rest of the strip malls around this area.

I also don't understand how you can build a 4 storey building 15 or 30 feet away from our house on the golf course with people overlooking our backyard and still expect us to be happy with it?

I sure hope and pray that you will reconsider building this project here so we won't have to move out of this wonderful neighborhood we have called home for so many years.

Warm regards,

Ali & Gilan Khodafar

Response to Comment Letter I39

39 Ali & Gilan Khodafar
 January 30, 2021

I39-1

Comment noted.

I39-2

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Pollution-related impacts are discussed in Section 5.3, Air Quality and Odor, Section 5.7, Greenhouse Gas Emissions, and Section 5.18, Water Quality, of the Draft EIR. Refer to **Master Response 7** regarding air quality and **Master Response 8** regarding greenhouse gas emissions. Pollution-related impacts (air quality, greenhouse gas emissions, and water quality impacts) were determined to be less than significant.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

I39-3

Aesthetics impacts were discussed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views. The comment addresses a subject area, which received analysis in the Draft EIR.

I39-4

Comment noted.

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Comment Letter I40

From: Alicia Deutz <adeutz@ljcds.org>
Sent: Monday, February 1, 2021 7:02 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCHNo. 2020039006

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Please listen,

I really don't know where to begin to address my concerns about this project.

Environmental concerns:
Adding so many (over 8,000 units) daily trips to our community is not going to promote public health through a reduction of greenhouse gas emissions.

Traveling within the community will really deteriorate the style of living we have paid to create.

With the addition of 1200 multi-family units doubles the number of medium density units.

With this said, the project does not meet one of its specific objectives and instead disrupts the balance of housing types and is a net loss of open space.
61%

Affordable housing:
My understanding is the proposed Affordable housing WILL NOT offer ownership, most will be rental. Housing projects should be affordable and offer opportunity for purchase.

I am asking please to not let this project happen.

Thank you,
Alicia Waldron Deutz
11329 Provencal Place
San Diego, CA 92128
Resident since 2015

I40-1

I40-2

I40-3

I40-4

I40-5

I40-6

Response to Comment Letter I40
40 Alicia Waldron Deutz
February 1, 2021

I40-1 The City acknowledges the comment as an introduction to comments that follow.

I40-2 Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. The comment addresses a subject area, which received analysis in the Draft EIR.

I40-3 Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment.

I40-4 Refer to **Master Response 1** regarding density. Refer to **Response to Comment O2-11a** regarding open space.

I40-5 Comment noted.

I40-6 Comment noted.

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Comment Letter I41

From: Bruce Forinash <brucef@investmentleasing.com>
Sent: Saturday, January 30, 2021 9:09 AM
To: Shearer-Nguyen, Elizabeth <EShearer@saniego.gov>
Cc: sjoshula@waltersmanagement.com <sjoshula@waltersmanagement.com>; Heather Wiltshire <hwiltshire@waltersmanagement.com>; Sherrie McNaughton <smcnaughton@waltersmanagement.com>; lleibenson@waltersmanagement.com <lleibenson@waltersmanagement.com>; tblizzard@waltersmanagement.com <tblizzard@waltersmanagement.com>; DSD EAS <DSDEAS@saniego.gov>
Subject: [EXTERNAL] RE: Trails at Carmel Mountain Ranch - comment letter on draft EIR

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Elizabeth

Thank you very much for your development plans!

Having a beautiful development of buildings and open space to serve people is so much better than an abandoned, weed filled golf course!

I41-1 Comment noted.

I41-1

Anyone that objects to apartment buildings, condos, and other well priced buildings in this area are just selfish, regardless of their age or station in life. This area already is surrounded with apartments and condos and they fit in fine and in many cases look much better than horrible yards and poorly selected paint colors, and old paint some of the single family homes have.

An example is the fact that this very golf course driving range was converted from an underused, ugly driving range to beautiful new condos and the region is so much better for it.

My wife and I have lived in and own our home here for 15+ years just near the clubhouse and have watched the neighborhood go down in pride of ownership, stabilize, and now is going up and your developing the many fairways between the homes from the horrible mess they now are into nice new fresh areas is great. Anyone that objects to the development plans of your Co. must think it is just 1 lot that looks bad, no, the fairways weave throughout this region and all are an absolute mess.

Another point is that the fences and keep out signs are unsightly and then the unkempt weeds all around them are bad. Recently someone had the audacity to dump trash in a stack just outside of the fence and near the sidewalk, a further indication that this place in its current state hurts peoples attitude and lets them think dumping trash is ok. (My hometown 60 years ago of Lancaster California has stacks of trash every ¼ mile apart along the 2-lane roads surrounding the city, an indication of what an ever declining area becomes).

I am solidly in favor, call on me if needed.

I arranged the financing on the original fleet of golf carts for the course and I know people paid \$60k more for fairway homes but all that is in the past. Today we need neatness, a plan, and housing for folks.

Bruce Forinash, 858-735-5271 Business owner, 15-year resident, 2-year Army veteran, advocate of neatness and this plan.

Thank you,

Bruce Forinash, Leasing Agent
brucef@investmentleasing.com
www.investmentleasing.com
800-400-5060 x 101 Work
858-735-5271 Mobile (available beginning at 9 am EST)
858-451-0033 Fax

Investment Leasing Company
Equipment, Software, & Vehicle Leasing & Financing Since 1986

FedEx & UPS address: 11835 Carmel Mt. Rd., Suite 1304-351, San Diego, CA 92128
All mail: P.O. Box 500110, San Diego, CA, 92150
Office: 16935 West Bernardo Dr., Suite #235, San Diego, CA 92127

Leases and loans will be arranged or made pursuant to California Department of Business Oversight's California Financing Law, License #603H958

From: Shearer-Nguyen, Elizabeth <EShearer@sandiego.gov>
Sent: Wednesday, January 27, 2021 9:53 AM

I41-1
Cont.

To: Bruce Forinash <brucef@investmentleasing.com>
Subject: Trails at Carmel Mountain Ranch - comment letter on draft EIR

Good morning,

Thank you for your email. The City is in receipt of the comment(s) provided on the draft Environmental Impact Report for the above referenced project.

Thank you,

Elizabeth Shearer-Nguyen
Senior Planner
City of San Diego
Development Services Department
☎ (619) 446-5369 | 🌐 <http://www.sandiego.gov>
Please Note: Work hours are M-F 6am to 230pm

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From: Bruce Forinash <brucef@investmentleasing.com>
Sent: Tuesday, January 26, 2021 8:17 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] FW: Re: Comment about 1,200 Housing Units Proposed for Old Carmel Mountain Ranch Golf Course - Trails at Carmel Mountain Ranch - Project 652519

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To whom it may concern-

I am all in favor of the proposed development plan and like it fully and support t.

Thank you,

Bruce Forinash, 17-year homeowner in Carmel Mountain Ranch
11907 Danvers Circle
San Diego, CA 92128

Call me at 858-735-5271

Bruce Forinash, Leasing Agent
(20+ years with Company)
brucef@investmentleasing.com
www.investmentleasing.com
800-400-5060 x 101 Work
858-735-5271 Mobile (available beginning at 9 am EST)
858-451-0033 Fax

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Office: 16935 West Bernardo Dr., Suite #235, San Diego, CA 92127

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Comment Letter I42

From: Cara Zylla-Paterson <cmzylla@gmail.com>
Sent: Thursday, January 28, 2021 4:57 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Comments on The Trails at Carmel Mountain Ranch, Number 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Ms. Shearer-Nguyen,

Regarding Project Number 652519, I would like to provide the following input to be considered. The full description of the project which I am referencing is as follows:

Project Name: Trails at Carmel Mountain Ranch
Project # 652519 / SCH # 2020039006
Community Plan Area: Carmel Mountain Ranch
Council District: 5

I have standing in this as a homeowner with property along the currently closed golf course where development has been proposed, with a view of the fairway. I have reviewed the draft Environmental Impact

I42-1

Response to Comment Letter I42
42 Cara Zylla-Paterson
January 28, 2021

I42-1

The City acknowledges the comment as an introduction to comments that follow.

Report (EIR) dated December 2020, and noted some outstanding issues that have not been given the consideration that I believe they warrant.

The report discloses three issues that remain **significant and unavoidable**, even after implementing mitigation; although only one of the three issues has a possible mitigation factor. These issues cannot be underestimated. In fact, they should nullify the proposed development project. Any potential benefit to alleviating the demand for housing is more than outweighed by the negative effects this development would produce.

The first significant and unavoidable issue is in Transportation/Circulation. The issue asks if the project would result in Vehicle Miles Traveled (VMT, which wasn't in the acronym list, by the way) exceeding thresholds identified in the City of San Diego Transportation Study Manual. There were a couple of mitigating measures that could be taken to add bicycle repair stations and add short term bicycle parking... but this does not in any way shape or form alleviate the severe traffic problems and congestion that this area already has. Quite the opposite, this proposed development project will significantly add to our traffic and parking problems making a currently untenable situation decidedly worse. This will not engender any good will towards the residents of the community. There is no way a community is going to suddenly switch from driving cars to riding bicycles, no matter how "convenient" developers will tell you it is to bike from Point A to Point B. Who can cart a week's worth of the family groceries on a bicycle? Or drop off their young children at school or sports practice (with all their equipment)? Most of the VMT is for errands which cannot be replaced by bicycles. Bicycles will likely stay relegated to recreational and fitness usage and not be a factor in this community's VMT. Why would the city seek to increase traffic and congestion when that is already a concern prior to any new development. Adding to those woes will make for a very unhappy community where people will not want to live, depressing housing values and contributing to an overall poorer community.

The second significant and unavoidable issue that this project will create is in the area of public services. While this study only looked at services provided by local city or county agencies and only came up with one service that had no mitigating factors, our public library, it is really only the tip of the iceberg on the effect of adding over 3,000 people (per the developer's estimate) to a community that, in reality, was not designed to support such a significant increase in population. Can we squeeze in a few thousand more people here? Perhaps; it can probably be done. But even though our public services can absorb the influx, the EIR does not fully assess the quality that those services will still be able to provide. Our classrooms are already overcrowded. Perhaps the school facilities can handle a few more students, but what about hiring the additional faculty and staff that will be required to meet the accelerated demand? The additional revenue from property taxes will not make up for the increased personnel (and materials, and increased utilities consumption/fees that go along with it) that the additional population will require. That alone should be a reason to deny this proposed development. There were no mitigating factors to alleviate the burden on public services. It remains a significant and unavoidable issue.

The third significant and unavoidable issue described in the EIR is, in my opinion, the most damaging. This is in the category of Population and Housing querying if the project would induce substantial unplanned population growth in an area, either directly or indirectly. While the case was made that indirect growth was not a factor, direct growth most decidedly is. While the EIR states that adding that number of people to an area that has not planned for that addition to the population would be potentially significant, and a significant and unavoidable issue with no mitigation, it does the reader a disservice by not providing any information on what the effect of this substantial unplanned population growth in a community that has neither planned for nor zoned for this. Including the negative effects mentioned in the prior two issues, the additional population will place an undue burden on the community. If one takes a look at the shopping center nearest the planned development area, mentioned in the EIR, the Carmel Mountain Plaza, it is already operating at capacity. The parking lot is always full, and it is currently a pain getting in and out of there since it is continually crowded there. Anyone driving on the I-15 during the morning commute or evening rush hour past Carmel Mountain Ranch knows that this is already a densely populated area based on the backed up traffic at this spot. Adding 3000 more people to the area is just unthinkable. It wasn't planned for; the community cannot sustain that level of population; and the surrounding communities will likewise suffer.

I42-1
Cont.

I42-2

I42-3

I42-4

I42-5

I42-2

If a project results in significant and unavoidable environmental impacts, the lead agency is required to prepare a statement of overriding considerations, which reflects the ultimate balancing of competing public objectives (including environmental, legal, technical, social, and economic factors). Therefore, a statement of overriding considerations must be considered and adopted by the decision-makers if the project is approved. The comment does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR.

I42-3

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and parking. The acronym list has been updated to include vehicle miles traveled as shown in ~~strikeout~~/underline to reflect this change in the Final EIR. Additionally, improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. The project will also provide a 25% transit subsidy for residents of Units 5 and 6.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

I42-4 Public services and facilities are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Under CEQA, impacts to public services and facilities are determined based on physical effects to the environment, including the need for new or expanded facilities, and not the quality of services provided. However, with regard to schools, impacts were determined to be less than significant. Refer to **Master Response 6** for more information regarding schools. The comment addresses subject areas, which received analysis in the Draft EIR.

I42-5 Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.

The EIR also considered water consumption and determined that current facilities at the Carmel Mountain High Water Pump Station were probably not sufficient. As their mitigating strategy they proposed paying a "fair share" amount to have the city retrofit and upgrade (provide a new pump) in order to meet the additional water needs. How much the developers decide is their fair share amount might not cover very much of the total bill, that the city would be completely liable for any remainder, which might be substantial. After all, the percent of the total population the pump station covers that is the additional residents from the development project is fairly small. Is the city prepared to foot most of the bill for a new water pump? Is that currently planned for in the city's budget?

Finally, while the EIR discussed Visual Effect/Neighborhood Character in section 5.17, and the impact on public vistas, the study did not account for the loss of view for all of the homeowners along the golf course who paid a premium on their homes for the golf course view. If that view changes from open space to houses, that very negatively impacts the value of the homes as well as the desirability of living in those homes. Does the impact of the loss of view on current residents not count for anything? I find that to be very ill-considered. Replacing an open space view with apartments, single family dwellings, or condominiums without compensation for removing that view, is not an even swap and is, in fact, quite a blow to those homeowners who paid for and enjoy having the open space view.

In summary, there are still a number of outstanding issues that have not been addressed that pose significant detrimental effects to the city and community, and potentially substantial unplanned costs to the city. I am not in support of development of the "Trails at Carmel Mountain Ranch" and urge the committee to consider a seriously scaled down development, perhaps of single-story, single family residences, or a winery, or any other plan that does not involve greatly increasing the population of this community. Thank you for your consideration.

Very respectfully,
~Cara Zylla

cmzylla@gmail.com
14750 Carmel Ridge Road
San Diego, CA 92128
619-417-8927

I42-6

I42-7

I42-8

I42-6

As discussed in Section 5.15, Public Utilities, of the Draft EIR and reiterated by the commenter, impacts to the Carmel Mountain High Water Pump Station were determined to be less than significant with implementation of **MM-UTL-1**, which would require the project to make a fair-share contribution for the reconfiguration/retrofit of the Carmel Mountain High Water Pump Station. The extent of the upgrades required at the pump station are not known at this time; however, the City would determine the amount of the fair-share contribution prior to the issuance of the first building permit for Unit 9 of the proposed project, as required by **MM-UTL-1**. The comment also raises economic, social, or political issues with regard to cost and payment for these pump station upgrades. The comment does not raise any specific issue regarding this the adequacy of the Draft EIR's analysis and, therefore, a more specific response is not required.

I42-7

Refer to **Master Response 2** regarding private views.

I42-8

Comment noted.

Comment Letter I43

From: Eljay Louis <gerald.louisa871@gmail.com>
Sent: Friday, January 29, 2021 8:32 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch by Urban west

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E. Shearer-Nguyen, Environmental Planner,
City of San Diego Development Services Center,
1222 1st Avenue, MS 501, San Diego, CA 92101

Sir,
When we purchased a house in Carmel Mountain Ranch in 1987, we looked to the codes and general plan to know what will be built in our neighborhood and in the community and we saw in the masterplan that Carmel Mountain Ranch is very low density residential communities with open spaces/golf courses.

Likewise, when we purchased our home, we also knew the land use limitations. We knew that the golf courses will be there and no neighbors or houses will be built in our backyard. As a matter of fact, we paid premium to these homes with golf course view and backyards. If these golf course is not in use or not profitable, it should revert to open space, if the land was not operated as a golf course. They should not build residential housing on the open spaces/golf courses especially rental, 3 story high and low cost housing in this neighborhood.

Now they are trying to change the land use so they can make a big profit and take away the land use protection that Carmel Mountain Ranch residents thought they had when they purchased their home. We are opposing to the plan build out of The Trails at Carmel Mountain Ranch as it will become a high density community which will severely create crowded housing, crowded schools, traffic jams, parking, crime and housing cost.

The proposed development of the trails will clearly result in a more undesirable place to live because of high density housing and over crowdedness, and a poor physical environment than would be possible under any single or combination of zone of housing in a master planned community.

We have two homes in this community and paid premium for the golf course with the intention that these homes will be suitable for my children to raise their own children in the neighborhood. With this plan, it will ruin what we have envisioned when we purchased these homes. We are opposing the buildout of the Trails at Carmel Mountain Ranch.

Please consider our concern. We would like to hear from you.

Sincerely,

Cesar and Luisa Jaro

14247 Seabridge lane

14437 Seabridge lane

Response to Comment Letter I43

43 Cesar & Luisa Jaro
January 29, 2021

I43-1

Comment noted.

I43-2

Refer to **Master Response 1** regarding density.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts were determined to be less than significant. Refer to **Master Response 6**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic, congestion, and parking.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I43-3

Comment noted.

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Comment Letter I44

From: dara_greaney@yahoo.com <dara_greaney@yahoo.com>
Sent: Thursday, January 28, 2021 1:21 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] comments on Carmel Mountain Ranch - Golf Course Development

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I am a homeowner in the community as well as a business owner with numerous employees.

I44-1

This project benefits only the developer and does nothing to help the middle class get into homes. You cannot approve 60% rentals and says its helping, that is just cash to a developer.

I44-2

Change the project to 600 units focused on those earning 60-120K a year, which means a sale price of \$500-700K. Our teachers, police, nurses and entry level professionals need to be able to live here too. I have 5 great employees making in that range and none can afford a townhouse let alone a home. Help me keep the employees here! I already have great pressure to open an office in Texas and hire more there. That way employees are happier. Currently they are all just frustrated that they make too much to be low income but not enough to afford a house.

I44-3

Thanks
Dara

Response to Comment Letter I44
44 Dara Greaney
January 28, 2021

- I44-1
Comment noted.
- I44-2
Comment noted. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact.
- I44-3
Comment noted. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact.

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Comment Letter I145

From: Delaram Naghneh <delaramn2002@yahoo.com>
Sent: Monday, February 1, 2021 7:33 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Mom/ Sir
 This is in regard to

The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. [2020039006](#).

As a resident of the Carmel mountain ranch for 29 years , I am very concerned about this new development. We do not have enough infrastructure for %25 percent increase of population in this area. I have seen projects by this builder in other areas. They use every inch of the land and leave no room for plants or breathing. This project has environmental impacts on our community. Please reconsider and do not allow them to build 1200 units.

Thank you
 You can reach me at 8586035589
 Dr. Delaram Naghneh
 14099 Brent Wilsey Pl unit 2, San Diego, Ca, 92128 1

Sent from my iPhone

I45-1

Response to Comment Letter I45
45 Delaram Naghneh
February 1, 2021

I45-1

Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information regarding roadway improvements. With regard to open space, refer to **Response to Comment 02-11a**. The Draft EIR has disclosed the environmental impacts of the project in accordance with CEQA. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I46

From: Frank Sowin <fsowin@gmail.com>
Sent: Saturday, January 30, 2021 2:44 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Frank Sowin <fsowin@gmail.com>
Subject: [EXTERNAL] Carmel Mountain Ranch proposed development - Recommend: NOT APPROVE

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dir Sirs,
 We strongly Recommend that you **NOT APPROVE** the proposed development.

The proposal for Carmel Mountain Ranch proposed development is inconsistent with the industry national trends (noted in the book RETROFITTING SUBURBIA cited below) a development and as compromises the core neighborhood values specifically in the area of density, traffic impairment and the unacceptable proposal for an alternate "master association". This proposal WILL CAUSE HARM TO ALL Current residents and the City will take on risks of future lawsuits for the following reasons.

The proposed new master association is not acceptable for the following reasons:

1

I46-1

I46-2

Response to Comment Letter I46

46 Frank Sowin

January 30, 2021

- I46-1** Comment noted.
- I46-2** Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.
- I46-3** To clarify, the project would include its own, independent Master Home Owner's Association (HOA) separate from any existing HOAs.
- I46-4** Refer to **Response to Comment I46-3**.
- I46-5** Refer to **Master Response 3** regarding traffic and parking. Additionally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Transient issues are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.
- I46-6** Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Additionally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would

1. Clearly, the new proposed master association does not include many key elements and existing articles included and in consistent support of the EXISTING MASTER ASSOCIATION, and 2. If even, the proposal was more fully vetted by the current homeowners, the proposed organization DISCRIMINATORY as it would be MISPLACED as it would be required to be "a part of the current Residential Community Association"! Meaning if it were considered to be acceptable, it would Legally be required to FALL UNDER the current Residential Community Association otherwise it will be considered discriminatory. Organizationally, the proposal does not represent the majority of residents even as proposed (when inhabited).

3. This proposed type of housing is adjacent to MY Property on the Golf course the N.U.W. proposal will cause me loss and harm my property's economic value. As referenced in the book as an adjacent property owner the increased density will create additional traffic on our already congested streets, parking problems and other transient issues for our community.

4. Sowins Economic harm: We will suffer economic loss resulting from decreased property value (my address is 13864 Carmel Ridge Road, SD) due to factors of high rise residential structures decreasing neighborhood visibility from my property, increased vehicular noise associated to higher traffic volumes, and more neighborhood noise from higher population density, more noise from city services (trash, city-county road & sewer-water services, and vendor services for internet, TV and similar service) plus increases in ambient noise levels with more people and more dogs.

5. Mental health impact assessment upon current residents: I see no evidence of considering the transition of a neighborhood transitioning from our communities golf course community to a community without open spaces lost (including greens, fairway tees plus the green open area between the holes as a result of mis-management by the management company (New Urban West failed operation).

6. Reject the proposal: New Urban West has Failed to act as a San Diego City good citizen to offer an alternative proposal more consistent with the current density average level, a unit density similar to adjacent neighborhoods (Rancho Penasquitos, Rancho Bernardo and Poway), and without increasing the vehicular demands as proposed. The City of San Diego's responsibility for city services will require larger budgets and level of effort by the City of San Diego for street and right of way maintenance costs.

For the reasons cited above, **WE strongly Recommend that you NOT APPROVE the proposed development.**

Please send a return reply to verify your receipt of this email message.
Thank you for your consideration.
Sincerely, Frank

Frank Sowin and family, 22-year resident
Carmel Mountain Ranch

RETROFITTING SUBURBIA, by Ellen Dunham-Jones and June Williamson.
See:
1. "RETROFITTING RESIDENTIAL Subdivisions", page #22 (chapter 2)
2. "Tomorrow's Suburbanites", Page #35
3. "Retrofitting Social Live", Chapter 4
--
Frank Sowin; cell: 408.836.9016
email - fsowin@gmail.com

I46-3

I46-4

I46-5

I46-6

I46-7

I46-8

I46-9

I46-7

I46-8

I46-9

result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Mental health is not a physical change to the environment. Regarding open space, refer to **Response to Comment O2-11a**.

Refer to **Master Response 10** regarding the alternatives analysis.

Comment noted.

Comment Letter I47

From: Gil Quinones <gilq01@gmail.com>
Sent: Friday, January 29, 2021 8:08 AM
To: DSD EAS <DSEAS@sanidiego.gov>; walters@management.com <walters@management.com>; waltersmanage.com@gmail.com <waltersmanage.com@gmail.com>
Subject: [EXTERNAL] Project No. 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To City EIR,
 I am a resident of
 Carmel Mountain Ranch RCA. Address: 12116 Via Milano, San Diego, CA 92128
 I do not want a Huge apartment building across the street from me for lower income housing or any type or for any type of multiple in one little area. Where the traffic and use of the road and services will be inundated with too many people in the area. This will bring "major crimes" to this peaceful community. This is not the area to do this.
 I insist that you stop the pursuit in this fruitless venture. This will also kill the beauty of the area
 area just because you think you will make a buck. Go to Valley View Center where there is more open land to build. STOP THIS NOW PLEASE!!

Very Concerned Owner,
 Gil and Katherine Quinones

I47-1

I47-2

I47-3

I47-4

Response to Comment Letter I47
47 Gil & Katherine Quinones
January 29, 2021

I47-1 Comment noted.

I47-2 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Public services and facilities are discussed in section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6** regarding schools and libraries. The comment addresses subject areas, which received analysis in the Draft EIR.

I47-3 Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment.

I47-4 Comment noted.

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Comment Letter I48

From: Jennifer Wilkes <jennifer.wilkes@hotmail.com>
Sent: Monday, February 1, 2021 9:33 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Troy@WealthAnalytics.com <Troy@WealthAnalytics.com>
Subject: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

February 1, 2021

E. Shearer-Nguyen, Environmental Planner
City of San Diego
Development Services Center
1222 1st Avenue, MS 501,
San Diego, CA 92101

1

Response to Comment Letter I48

48 Jennifer Wilkes

February 1, 2021

I48-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1** as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. The Draft EIR was prepared in accordance with CEQA. Impacts were analyzed and mitigation was provided when feasible.

Reference: Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

Dear Ms. Shearer-Nguyen and City Council:

As a Resident/homeowner in Carmel Mountain Ranch, I strongly oppose the proposed Trails at Carmel Mountain Ranch Project (Project). The Project violates the many provisions of the California Environment Quality Act (CEQA). The Project destroys the community character of Carmel Mountain Ranch and presents **a number of unmitigable environmental impacts**.

I48-1

Increased Evacuation Risk

Evacuation from Carmel Mountain Ranch in the event of a wildfire will be extremely difficult and the proposed 1200 homes and 3500+ residents exacerbate an already dangerous situation. Living in Scripps Ranch during the 2003 and 2007 fires, I can attest to the fear of not being able to evacuate in a timely manner. When I received the call to evacuate, it took me over 2 hours in traffic just to get to the freeway. With the proposed addition of homes/residents, it would make it nearly impossible to evacuate safely.

I48-2

Traffic Impacts

Traffic and VMT would be much worse in the area of the project. The EIR states "the project would be unable to reduce VMT impacts to a less than significant level, and the project's contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant." In addition the EIR states: "at the project-level, the project would be unable to reduce VMT impacts to a less than significant level, and the project's contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant." This would lead to increased gridlock, more air pollution, more GHG and reduced quality of life for people living in Carmel Mountain Ranch. The substantial cumulative impact of the Project on air quality and climate change is, by itself, enough to reject this project.

I48-3

Public Recreational Area is Reduced. Easements show Trail-Side Amenities are Private.

The Project is creating a net reduction in Parks and Open Space for CMR as being proposed as NUW is proposing developing over half of the 164-acre golf course (11 of 18 holes). Golf course is a recognized Parks and Recreational Open Space per the City's General plan. Project leaves a considerable amount of land unused, dormant and blighted with one of their proposed parks left for City to develop. This park location is very inaccessible via ADA or by any emergency or maintenance vehicles. As a resident who purchased in this community because of the open space, I would like to see more parks and recreation areas due to uniqueness and amount of open space in CMR. These spaces should be developed recreationally such as additional playfields, playgrounds, passive park space, frisbee golf or skatepark.

I48-4

Strongly Oppose the Project

As stated above, I oppose this project because it will cause substantial environmental damage. The Project will result in the destruction of community character, loss the open space and parkland, increased wildfire risk, elevated evacuation risk, creation of more sprawl housing, massive increases greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigable environmental impacts.

I48-5

Our family strongly urges the rejection of this project.

Respectfully Yours,

Jennifer Wilkes
12128 Waverly Downs Lane
San Diego, CA 92128

I48-2

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I48-3

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. As identified in the Draft EIR, the project would result in a significant and unavoidable transportation impact. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

I48-4

Refer to **Master Response 1**, regarding consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Refer to **Response to Comment 02-11a** regarding parks and open space. Refer to **Response to Comment 02-11b** regarding the City's park development process. All parks would be constructed and delivered by the builder as part of the project. The entirety of the project site would be subject to regular maintenance and brush management.

Emergency access is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. As discussed therein, the proposed project would not result in inadequate emergency access. Additionally, as stated in Section 5.19, Wildfire, of the Draft EIR, all private access roads would be constructed in accordance with San Diego Municipal Code Sections 55.8701 and 55.8703, which outline the requirements for fire apparatus access roads and gates to ensure adequate emergency access within the project site. Impacts associated with emergency access were determined to be less than significant. Refer to **Master Response 3** regarding transportation/circulation and ADA accessibility. The comment addresses subject areas, which received analysis in the Draft EIR.

I48-5 Regarding alternatives, refer to **Master Response 10**.

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Comment Letter I49

From: joel corona <joelcorona@msn.com>
Sent: Monday, February 1, 2021 8:07 PM
To: DSD EAS <DSDEAS@sanidiego.gov>; sjoshula@waltersmanagement.com <sjoshula@waltersmanagement.com>; joel corona <joelcorona@msn.com>
Subject: [EXTERNAL] Oppose - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

February 1, 2021

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

Dear City Environmental Planner,

1

Response to Comment Letter I49
49 Joel Corona
February 1, 2021

I49-1 Comment noted.

I am writing to oppose the development of low-income housing that will also be 60% rentals at The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

I49-1

This proposed project is near my home at 12216 Mulholland Court in the Mount Carmel area. That area is ill advised for both low-income and greater than 50% renters. T

The proposed physical changes will increase: traffic, noise, litter, pollution and transiency. It will reduce the quality-of-life in my community. It will harm my property value and my neighborhood. It will place a demand on municipal services and that will both strain resources for water, road and emergency services. It will increase taxes. This development appears to be a sale by the City of our private landowner- and civil-rights. This project may violate private land-owner rights and persons civil-rights.

I49-2

Families, like my family, earned and saved money to purchase a home in the Carmel Mountain area. We could have purchased a home in another City. We invite and welcome other persons to also earn and save and invest in our community, as many persons did, too.

I49-3

For the aforementioned reasons, and others, we oppose this give-away of public-funds and private-entitlement to a wealthy land development company from another community, in the name of low-income housing.

I49-4

Please reply to my e-mail so that I know that my voice of opposition is being heard about this matter.

I49-5

Sincerely and respectfully,

Joel Corona
joelcorona@msn.com

2

I49-2

Traffic was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** for additional information.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Pollution-related impacts are discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Water supply and utility infrastructure are discussed in Section 5.15, Public Utilities, of the Draft EIR. Water supply and utility infrastructure impacts were determined to be less than significant.

Emergency services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to emergency services were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

I49-3

Comment noted.

I49-4

Comment noted.

I49-5

Comment noted.

Comment Letter I50

From: John W. Gleason <gleason7@gmail.com>
Sent: Saturday, January 30, 2021 3:27 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] CMR Development Plans - New Urban West

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

My family has resided in Carmel Mountain Ranch for 22 years. We are very much opposed to this proposed development of 1,200 units on the old golf course property.

First, 1,200 units is far too many to add to our CMR community, especially with the increased traffic that it would bring.

Second, anyone whose residence is next to the golf course might have to live with a multi-story condominium or apartment just a few feet away from their home. They purchased the property with the expectation of a beautiful space behind their home; this proposed development would instead give them an ugly multi-story building to view. That's an awful downgrade in family enjoyment.

Third, the values of real estate of many homes would suffer because of the issues mentioned above.

We are strongly opposed to this new development plan!

Sincerely,
John W. Gleason
Christine W. Gleason
13717 Shoal Summit Drive
San Diego, CA 92128

I50-1

I50-1

Response to Comment Letter I50
50 John & Christine W. Gleason
January 30, 2021

The comment addresses subject areas, which received analysis in the Draft EIR. Regarding the significant and unavoidable impacts of the project, the City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project.

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Comment Letter I51

From: Kathleen Jensen <kathleenjensen129@gmail.com>
Sent: Saturday, January 30, 2021 12:02 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] RE: The Trails at Carmel Mountain Ranch Project 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Date: January 31, 2021
From: Kathleen Jensen Phd.
Resident of Royal Ste. Georges

As a resident of Carmel Mountain, I have grave concerns about the proposed Trails at Carmel Mountain Ranch Project. There are many reasons to disallow this project, including two troubling SAFETY ISSUES that cannot be ignored.

First, this area was declared by the state to be a "Very High Fire Severity Zone." The state legislature introduced a number of bills prohibiting construction in such dangerous areas as the additional fuel intensifies fires. We're already at risk of fire; it is grossly negligent to add a high-density housing project - particularly since the frequency and severity of wildfires is increasing so dramatically.

A second HUGE safety issue is that densely-packed residents might not be able to safely evacuate in the event of an emergency. Getting on the highway is already painstakingly slow. Despite living only one block from 15 and 56, it often takes me 25 minutes to get on the highway! Adding a large number of residents will only make this problem worse. And in the event of a wildfire, the roads to the highway are likely to be "parking lots" filled with trapped residents. As you know, in 2003 ten people died trying to escape the Cedar Fire. The number of fatalities here could be much higher.

The risks of wildfires and loss of life during an evacuation make the site inappropriate for this project. I urge you to act responsibly, with citizens' safety in mind. Stop this project and prevent a potential disaster.

I51-1

I51-2

I51-3

Response to Comment Letter I51
51 Kathleen Jensen
January 30, 2021

- I51-1
- The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.
- I51-2
- Wildfire hazards are discussed in Section 5.19, Wildfire, of the Draft EIR and impacts were determined to be less than significant. Refer to **Master Response 5**.
- I51-3
- Comment noted.

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Comment Letter I52

From: Kathleen Stahl <stahl7@outlook.com>
Sent: Monday, February 1, 2021 6:17 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project: The Trails at Carmel Mountain Ranch • Project#652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

First and foremost, I **vehemently oppose** any new housing in Carmel Mountain Ranch.

I have resided in north San Diego county for over 30 years. I've been a homeowner starting out in Sabre Springs to Rancho Bernardo and now currently in Carmel Mountain Ranch for the past 11 years. I've witnessed the insane growth of more and more housing. All of the new construction and housing increases the already horrific amount of additional traffic, severe negative environmental impacts, pollution, crime, and a reduced quality of life. Hundreds of homes, apartments and condos have already been newly built on the west side of I-15 in Carmel Mountain Ranch. Each new resident will undoubtedly have 2-3 drivers in their household. I am respectfully pleading with you to not approve any more housing.

I52-1

Response to Comment Letter I52
52 Kathleen Stahl
February 1, 2021

I52-1 Comment noted.

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From: Ho, Khiet <Khiet.Ho@ga.com>
Sent: Friday, January 29, 2021 1:21 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails At Carmel Mountain Ranch - Project No. 652519

Comment Letter I53

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

E. Shearer-Nguyen
 Environmental Planner
 City of San Diego Development Services Center
 1222 1st Avenue, MS 501, San Diego, CA 92101

Dear Mr. Nguyen,

The planned 1,200 units include affordable housing and approximately 60% rental units, as well as a brand new master association! This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other issues for our community.

Please I am requesting you to re-consider on a different plan that will provide more quality of life for Carmel Mountain Ranch residence.

Sincerely yours,

Khiet Ho
 Owner at 11743 Windcrest Lane SD, 92128.

I53-1

I53-2

Response to Comment Letter I53

53 Khiet Ho
 January 29, 2021

I53-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and parking. Refer to **Master Response 1** regarding density. The comment addresses subject areas, which received analysis in the Draft EIR.

I53-2

Comment noted.

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Comment Letter I54

From: Kyle Lee <kyleappoint@gmail.com>
Sent: Saturday, January 30, 2021 1:19 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project : Carmel Mountain Ranch OLD Golf course matter

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear,
 My name is Kiyoun Lee, Home owner of 12067 World Trade Dr, San Diego, CA 92128.
 I would like an appeal about OLD Golf course development not agreed and not supported at all.
 Because here Carmel Mountain already has full traffic and not enough places to quality life with family outside and lack of nature.
 Please not build more houses but more parks and playground for children.
 Thanks for your concern.
 Thanks
 from Kyle Lee
kyleappoint@gmail.com
 Skype : leeusca

I54-1

Response to Comment Letter I54
54 Kiyoun/Kyle Lee
January 30, 2021

I54-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Response to Comment 02-11a** regarding parks and open space. Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I55

From: Leslie Hemmerling <leslie.hemmerling@yahoo.com>
Sent: Saturday, January 30, 2021 1:29 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails In CMR

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To whom it may concern. We are an original buyer of a Presley Home at the Bluffs in CMR, and we were specifically told we were the absolute last development to be built in CMR!!! We can't help it the golf course went defunct, but we don't need more housing in this community! As it was, we were the last to be built and must have been at capacity then, 22 years ago. This is ludicrous the city wants to build here. I see new builds in Poway, that's a great place, and they have squeezed some apartments on a corner by Oak Knoll. Our open space was not intended for additional homes, it was for a golf course, and if it can't be that, the City can make some nice parks in there!! We have nothing like that within our community. More home builds isn't the answer. Go focus on that land off the 56 freeway where housing is going! I worked to hard to live here and I'm not about to have low income housing move into this community. This isn't a low income housing location. This is absolutely the wrong solution for CMR!!!

Leslie Hemmerling
CMR Resident

Sent from my iPhone

I55-1

I55-1

Response to Comment Letter I55
55 Leslie Hemmerling
January 30, 2021

Comment noted.

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Comment Letter I56

From: madonnajohnson@cox.net <madonnajohnson@cox.net>
Sent: Friday, January 29, 2021 8:57 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Ranch development Trails

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We do not want low income high density housing as it brings more traffic and parking issues. We seldom get to park in front of our house now as there is always someone parked there. Traffic is already heavy in the area with the homes there, and bringing more, normally at least 2+ cars per apartment, traffic and parking will be a #1 issue. I vote against that project. I would prefer townhomes that would at least blend with the landscape of homes, not apartments. Madonna Johnson, 14454 Seabridge Lane, San Diego, CA

I56-1

Response to Comment Letter I56
56 Madonna Johnson
January 29, 2021

I56-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I57

From: Lazernik, Marc <MLazernik@powayusd.com>
Sent: Monday, February 1, 2021 11:30 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Hello,

As succinctly as possible, there is absolutely no feasible justification for this blatant money grab other than pure, unadulterated greed at the expense of those who are the greatest stakeholders.

I57-1

1

Response to Comment Letter I57

**57 Marc Lazernik
 February 1, 2021**

I57-1 Comment noted.

I57-2 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Refer to **Response to Comment 02-11a** regarding parks and open space.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

I57-3 Comment noted.

- We, the residents of Carmel Mountain Ranch, *do not want this development*.
- Our roads will become impassable.
- Our open space will be destroyed.
- Our schools will become overcrowded.
- The Rancho Penasquitos developments are already a public eyesore and an abomination to our roads.

I57-2

For once, do the right thing. Say no to the money. Say no to overcrowding. Say no to hollow promises and justifications. Say yes to the will of the people (remember when government used to respect that?).

I57-3

Marc Lazernik
RSP Teacher
Rancho Bernardo High School
Asst. Football and Track Coach
Freshman Success Coordinator



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Comment Letter I58

From: Lazernik, Marc <MLazernik@powayusd.com>
Sent: Monday, February 1, 2021 11:35 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] RE: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Nice use of COVID as an excuse for your inability to do your job. Aren't you grateful that health care workers and teachers don't use this excuse?

Marc Lazernik
RSP Teacher
Rancho Bernardo High School
Asst. Football and Track Coach
Freshman Success Coordinator

I58-1 Comment noted.

I58-1



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From: DSD EAS <DSDEAS@sanidiego.gov>
Sent: Monday, February 1, 2021 11:30 AM
To: Lazernik, Marc <MLazernik@powayusd.com>
Subject: Automatic reply: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Thank you for contacting the City of San Diego Development Services Department (DSD). We will review and process your request as soon as possible, based on available resources. As the global effect of the COVID-19 pandemic continues to evolve, we are modifying operations to ensure the health and safety of our customers and employees. Keep up-to-date with the latest operational changes here <https://www.sandiego.gov/development-services/covid-19-public-notice>.

DSD Email Updates: Visit <https://sandiego.gov/dsd-email> to receive the latest updates from DSD directly into your email inbox.

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Comment Letter I59

From: msuycott@san.rr.com <msuycott@san.rr.com>
Sent: Sunday, January 31, 2021 6:07 PM
To: DSD EAS <DSDEAS@san.rr.com>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch Project Number 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To: E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center

Reference: The Trails at Carmel Mountain Ranch Local Mobility Analysis dated December 18, 2020

Table 6 in the reference document is the project trip generation analysis which appears to significantly underestimate the trip demand which would result from the additional housing units.

The analysis lists daily rate of 8 for townhomes and 6 for apartments, with each event being a trip either outbound or inbound. As stated in the mobility analysis, these rates are taken from the City of San Diego Municipal Code Trip Generation Manual (revised May 2003) and are found in table 1 on page 6.

There are several areas that are either unclear or appear underestimated:

I59-1

Response to Comment Letter I59
59 Mark Suycott
January 31, 2021

Traffic was discussed in Section 5.23, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I59-1

1. The Trip Generation Manual rates are based per dwelling unit and vary based on dwelling unit density. But absent regulation on the number of motor vehicles each dwelling unit may possess, there is nothing preventing dwelling units in higher unit density areas from generating the same number of trips as those in lower density areas, particularly for the same type of dwelling unit (townhome).
2. The city analysis from 2003 may very well be outdated and in need of revision – it is nearly 20 years old and demographics have changed. One need only drive around this area to see single family homes with at least two, many times three, and often more cars parked near the dwelling. Whether it is extended family, children remaining at the home into adulthood, or other reasons, actual population density in dwelling units is on the rise. Thus the trip generation analysis has likely underestimated the actual traffic demand.
3. The Mobility Analysis focused on intersections and did note the issue at Ted Williams Parkway and Shoal Creek Drive (page 46). The recommended full access signal at Carmel Ridge Road/Ted Williams Parkway is assessed to alleviate the Shoal Creek Drive intersection issue but there appears to be no analysis on impact to Ted Williams Parkway traffic volume. Even if operating properly, an additional signal will interrupt Ted Williams Parkway traffic. The Highland Ranch Road/Ted Williams Parkway signal typically extends green signal to Highland Ranch Road southbound even with all southbound traffic cleared, delaying Esprit northbound and of course Ted Williams Parkway. Another signal on Highland Ranch Road has periodically had a cycle of stopping southbound traffic to present a left turn to northbound traffic when there was no car in the left turn lane. These traffic light issues will exacerbate impact to Ted Williams.
4. I may have missed it, but the analysis may have overlooked what might be the critical “intersection” from a safety perspective...the Rancho Carmel Drive on-ramp to Ted Williams Parkway at the I-15. This is challenging under current conditions as on-coming traffic must immediately merge to continue on CA-56 or exit to I-15 south. Additional traffic from the new development will create traffic jam/bottleneck in this area. The analysis does assess time delay at the intersection, but not the safety hazard of additional traffic at that merge.
5. There appears to be no analysis on the impact to I-15 southbound on-ramp metering lights. Pre-covid rush-hour backup has extended to CA-56. Additional traffic could extend this backup even farther and should it reach CA-56 an already hazardous interchange is made worse.
6. The analysis does assess peak morning and evening traffic demand. It does not appear to address catastrophic traffic demand such as would result from a mass evacuation (e.g.; wildfire). Civil Engineering addresses more than just the routine day to day utilization to account for more stressing conditions such as a 100 year storm used for designing dam/reservoir/spillway. One need only look to the 2003 Cedar Fire and the 2007 Witch Creek Fire to see the stark reality of immediate mass evacuation. While our firefighting techniques and coordination have improved in the subsequent years, mass evacuation amid impending disaster remains a very real possibility. An assessment of the traffic demand and duration for a mass evacuation is recommended.
7. The Project Trip Generation (Table 6 of the Mobility Analysis) indicates 1,201 units. The Vesting Tentative Map (DSD Appendix T) Bullet Point Narrative on the Cover Sheet indicates 53.2 acres to be developed into 1,200 multi-family residential units and 164.54 acres to be subdivided into 10 lots for 1200 condominium units (as well as the art center, public parks, and open space). The mobility analysis appears to have omitted the traffic demand from the 1200 condominium units.
8. It is unclear (or I may have missed) whether a parking analysis has been done. The Bullet Point Narrative does indicate that some lots will comply with LDC section 142.0560 but there are no specifics as to adequacy or quantity. There are cars parked on the street throughout Carmel Mountain Ranch despite the preponderance of single family homes with multi-car garages. Townhomes, apartments, and condominiums with even higher density will likely have inadequate parking unless the development is forced to include dedicated carport or garage structures.
9. Carmel Mountain Ranch is a Community Facility District (i.e.; Mello-Roos). It is unclear if the new units proposed under this project would be subject to Mello-Roos as have been the existing units. The additional units should be expected to place additional demands not only on the traffic infrastructure but our schools as well.
10. The Vesting Tentative Map has no specific plots or buildings. The Bullet Point Narrative states that the Vesting Tentative Map is proposing development and subdivision and indicates that final maps are to be recorded in the future. Absent specifics of building locations and specifics of the proposed master planned development permit it is unclear whether compliance with city regulations asserted in the document will/can actually be realized.

Your time and consideration of these comments are very much appreciated.

Mark

Mark Suycott
msuycott@san.rr.com
(858) 735-2423
13611 Essence Road

2

159-2

Trip generation rates and procedures are consistent with City requirements. The trip generation rate by residential land use type was applied correctly per City requirements.

159-3

Trip generation rates in the City are prescribed by the City of San Diego Trip Generation Manual contained in the Land Development Code. The Trip Generation Manual is used to determine trip generation for land development projects in the City.

159-4

Expected delay at intersections along Ted Williams Parkway resulting from the installation of a signal at Ted Williams Parkway/Carmel Ridge Road and the resulting shift in traffic can be found in the intersection analysis results in Appendix D of the Local Mobility Analysis (Draft EIR Appendix C). The analysis concluded that addition of the new signal does not result in delays that exceed the City's level of service targets. Proposed roadway improvements are also discussed in Chapter 3, Project Description, of the Draft EIR.

159-5

The design of the intersection is consistent with Caltrans' design standards. The project does not propose to change the design. All facilities were analyzed per the City of San Diego's Local Mobility Analysis guidelines. No additional analysis of this facility is required. Therefore, the project would not increase hazards at this intersection, due to a design feature or incompatible use.

159-6

The City of San Diego Transportation Study Manual (City of San Diego 2020) established study requirements for transportation/circulation analysis

in the City. The Transportation Study Manual does not require the analysis of metered freeway on-ramp locations in the Local Mobility Analysis.

- I59-7** Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation impacts were determined to be less than significant. Refer to **Master Response 5**. The project would not impair or physically interfere with an adopted emergency response or evacuation plan.
- I59-8** To clarify for the commenter, the project would result in a total of 1,200 multi-family residential dwelling units, not 2,400 units. Specifically, the project would include 451 townhomes on approximately 26.2 acres, 543 market-rate apartments on approximately 19.1 acres, 78 affordable apartments on approximately 2.3 acres, and 128 mixed market-rate and affordable apartments on approximately 3.4 acres.
- I59-9** Refer to **Master Response 3** regarding parking.
- I59-10** Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I59-11** As mentioned by the commenter, final maps will be recorded in the future. Final building plans would be required to comply with the project's approved Entitlements and all applicable City regulations in effect at that time. In addition, final building or architectural plans would be required to comply with the Master PDP and associated Design Guidelines (Draft EIR Appendix B).

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Comment Letter I60

From: namhyuk.cho <alfonso8891@gmail.com>
Sent: Monday, February 1, 2021 10:15 AM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] New Urban West's plan - 1,200 units development (at Carmel Mountain Ranch)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear San Diego.gov,

I'm a resident in 92128.

The golf course(Carmel Mountain Ranch) has been originally located in this area to balance an existing residence area and green area.

This golf course did not do any good role for this area for a while. The owner was focusing on making money with this golf course. By mentioned development, 92128 will face a serious traffic jam and various kinds of troubles.

1. Lack of School Capacity
2. Traffic Jam (to Highway, local road)
3. Criminal Rate will be getting worse.
4. Too many new rental units will devalue this area.
5. There is not any space to increase the road capacity.

Please do not consider to locate new 1,200 units of residential in 92128.

Best regards,

Namhyuk Cho
TEL : 858 776 1015

I60-1

I60-2

I60-3

Response to Comment Letter I60

60 Namhyuk Cho
February 1, 2021

I60-1

The City acknowledges the comment as an introduction to comments that follow and also expresses general opposition to the project.

I60-2

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Traffic was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I60-3

Comment noted.

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Comment Letter I61

From: nik shevelkin <aipfinancialgroup@gmail.com>
Sent: Monday, February 1, 2021 5:09 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Troy@wealthanalytics.com <Troy@wealthanalytics.com>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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I am Paul Shevelkin on behalf of Flamenca family trust (active trustee) as a resident of Heritage Hill community at Carmel mountain ranch
At 12359 Cornwallis square ,San Diego,CA 92128 absolutely against the NUW 1,200 unit project!

Project Number 652519/SCH No. 2020039006.

I61-1 Comment noted.

I61-1

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Comment Letter I62

From: Rafael Arreola <rafaelarreola@yahoo.com>
Sent: Friday, January 29, 2021 2:13 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch Project no. 652519 development

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

My name is Rafael A. Arreola. I own unit 12083 Tivoli Park Row #4, San Diego, CA. 92128.

I want to register my opposition to the proposed development described above. I purchased my unit, located in the corner overlooking the lake and golf course on the second hole, specifically because of its location, view and open space. Converting the view and open space to build 1200 units on the golf course is detrimental to my unit and its value.

While I am a strong supporter of building low and moderate income housing in San Diego, I do not believe that the benefits outweigh the damage to the existing units in this development. I believe there are many other alternatives to build low income housing in and around the City of San Diego. There is a tremendous difference in having a unit with a view of a golf course or open space and having 1200 other units in the neighborhood. Not only will it affect property values but it will be detrimental to the safety and well being of the existing owners and residents of Carmel Mountain Ranch. Even simply using common sense it should be obvious there will be a great increase in density, traffic, pollution, safety and education for new children. I also don't believe this development was envisioned in the original master plan or else it would have been designed and built accordingly. Making a major modification to the master plan at this late date is unnecessary and inappropriate!

I sincerely hope you examine this development closely and deny the approval!

Very truly yours,

Rafael A. Arreola, owner

t
t

I 62-1

I 62-2

I 62-3

I 62-4

Response to Comment Letter I62
62 Rafael A. Arreola
January 29, 2021

I62-1

Aesthetics impacts were discussed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Home values are not a physical change to the environment.

I62-2

Refer to **Master Response 1** regarding density.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

With regard to pollution, pollution-related topics include air quality, discussed in Section 5.3, Air Quality and Odor; and health and safety, discussed in Section 5.8, Health and Safety, and wildfire, discussed in Section 5.19, Wildfire, of the Draft EIR. Impacts under these topics were determined to be less than significant. Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

- I62-3** Refer to **Master Response 1** regarding Community Plan consistency.
- I62-4** Comment noted.

Comment Letter I63

From: Ragav Anumasa <ranumasa@gmail.com>
Sent: Monday, February 1, 2021 10:12 AM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project No. 652519 , SCH No. 2020039006, Name: Trails at Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi,
Subject : Oppose the housing project for Old golf course at Carmel Mountain Ranch

I am a community resident of Carmel Mountain Ranch San Diego 92128.
 I would like to oppose the proposed housing project by developer New Urban West for old golf course at Carmel Mountain Ranch. I think this will significantly increase the traffic around the community , increase pollution and other environmental inconvenience for residents.

Thanks,
 Raghavendar Anumasa

I63-1
 I63-2

Response to Comment Letter I63
63 Raghavendar Anumasa
February 1, 2021

I63-1

Comment noted.

I63-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. With regard to pollution, pollution-related topics include air quality, discussed in Section 5.3, Air Quality and Odor. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I64

From: Rajiv Bachhu <rajiv.bachhu@gmail.com>
Sent: Sunday, January 31, 2021 5:13 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project ID: 652519, Trails at CMR

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

I am property owner of CMR at 14641, Carmel Ridge Road, San Diego 92128.

I am writing to OPPOSE the planned development of Trails at CMR. I believe the intent of why I purchased will be significantly be affected due to style of home being developed not aligning with overall community at CMR. Additionally, this will put stress to our local schools and traffic. Lastly, I am very concerned about safety of my home due to new development in close proximity which will have many temporary / rental properties.

Thank you
 Rajiv Bachhu
 408-836-8648

I I64-1
 I I64-2
 I I64-3

Response to Comment Letter I64

**64 Rajiv Bachhu
 January 31, 2021**

I64-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1** as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts.

I64-2

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

The comment addresses subject areas, which received analysis in the Draft EIR.

I64-3

Refer to **Response to Comment O2-7** regarding public safety.

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Comment Letter I65

From: namiji1@aol.com <namiji1@aol.com>
Sent: Saturday, January 30, 2021 5:44 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch/Project 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Like many homeowners in the area, I bought a home in the Carmel Mountain area that sits on the edge of the golf course. In fact, I chose my home because the largest window in the house frames a pond and one of the holes on the course. This aspect significantly increased the value when I purchased the house. Now, Urban West wants to squeeze in more development in an area that doesn't have enough room to accommodate the development without a significant negative effect on property values and quality of life.

It is ridiculous to have to listen to Urban West try to oversell ideas of public paths, parks, open space, all while messaging that somehow they are doing this for the greater public good and their motivation is only to provide wonderful homes for young hard working families, when the truth of the matter is that they are just trying to squeeze in more development so that they can put more money in their pockets! At the end of the day, they are not going to care what impact this squeezed in development has on our quality of life, as long as they are able to make a profit. I absolutely am opposed to the Trails at Carmel Mountain Ranch project.

Ralph Pyeatt
Carmel Mountain Ranch Homeowner

Response to Comment Letter I65

65 Ralph Pyeatt
January 30, 2021

I65-1 Comment noted.

I65-1

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Comment Letter I66

From: Richard Hill <rhill@sandiego.edu>
Sent: Monday, February 1, 2021 4:34 PM
To: DSD EAS <DSDEAS@sandiego.gov>; troy@wealthanalytics.com <troy@wealthanalytics.com>
Subject: [EXTERNAL] The Trails at Carmel Mtn Ranch- Project # 652519/SCH no. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern,
I am vehemently against this project. This beautiful, serene community of Carmel Mtn Ranch is already busting at the seams. Our beautiful neighborhoods were brilliantly designed with traffic flow, shopping and schools being prioritized. To add the proposed units would bring traffic jams, overcrowded stores, and generally an UNSAFE environment. The space quite simply cannot handle any more. The big box stores of Costco and Home Depot, as well as Target down the hill, already have extended this area to its max. Please. make the right decision! Plenty of housing to our north (Escondido, San Marcos), To our south (Mira Mesa, Scripps Ranch) and especially to the west with Penasquitos and the 56 corridor showing many properties....
Sincerely, Rich Hill-14585 Rutledge sq SD CA 92128

I66-1

Response to Comment Letter I66

66 Richard Hill

February 1, 2021

I66-1

Traffic is discussed in Section 5.2, Transportation/Circulation, and public services and facilities are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact to library facilities. Refer to **Master Response 6** regarding schools and library facilities. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I67

From: Robert Helin <roboman4@me.com>
Sent: Monday, February 1, 2021 6:11 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: Troy Daum <Troy@WealthAnalytics.com>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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To Whom It May Concern,

Regarding The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006 Environmental Impact Report

The New Urban West proposal to develop the former Carmel Mountain Ranch Golf Course property and its accompanying Environmental Impact Report is deeply flawed and unacceptable in its current form. There are too many falsehoods and misleading statements in the proposal and EIR for me to address. The letter from our HOA covers most of the issues and the letter from the Sierra Club helps. My biggest concern is to the livability and aesthetic compliance to the character of the neighborhood that this project blatantly ignores.

My home is located adjacent to a fairway that is proposed to have 3-4 story apartments built. Currently, my backyard view is across a fairway to the Collage Town Homes about 100 yards distant. My backyard has a non-privacy iron bar fence that allows for more open sight lines to the fairway open space. The proposed 3-4 story buildings (at a 50' setback) would not only violate the Mediterranean architecture that defines the neighborhood, but would eliminate any sense of privacy in the back yards of all the residences along this section. Please visualize this before you read further. No amount of fencing can mitigate the sight lines from the proposed buildings looking down into backyards. Noise, security and air quality would all be dramatically adversely effected as well. The platitudes offered by the NUW sales and marketing team at their "Community Outreach" events were infuriatingly vague and when questioned further, filled with mathematical errors and therefore untrustworthy.

I bought my home here 10 years ago to retire after a career that took me all over the country. I did a lot of research and had a lot of choices when I decided to purchase my home here. I'm not a huge fan of HOA's, but the CMRCA run by Walters Management is one of the best I've encountered. I gladly follow their guidelines and enjoy the look and feel of the neighborhood as a result. Interleaving a completely separate and non-conforming HOA throughout an existing community doesn't make any sense at all. I've seen both good and bad infill developments in places like Colorado Springs, CO, San Jose, CA and suburbs of Los Angeles. The ones that work have a common ethic - enhance and improve the neighborhood while minimizing negative impacts to surrounding land owners. The negative effects of added traffic, congestion, pollution and stress to the school districts, grocery parking and other aspects of this community far outweigh any benefit except the enrichment of a few land developers and an already wealthy property owner.

The alternative proposals to keep the open space open, or to simply build single family homes in accordance with the existing city plan and within the confines of the existing HOA guidelines are a much better choice for this land use.

Thank you for your attention,

Rob Helin
11944 Brewster Court
San Diego, CA 92128
(408) 966-9793 (cell)
(858) 592-8865 (home)

Response to Comment Letter I67
67 Robert Helin
February 1, 2021

I67-1

A range of building types and densities are proposed; however, the overarching Design Guidelines would result in compatible themes and elements across the proposed neighborhoods and with the surrounding community. Refer to **Master Response 1** as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. The Draft EIR determined the project's impacts would be considered less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

I67-2

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

I67-3

Refer to **Response to Comment I67-1**.

- I67-4** Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and parking. Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. Pollution-related topics include air quality, discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.
- I67-5** Refer to **Master Response 10** regarding alternatives. Refer to **Response to Comment O2-11a** regarding parks and open space.

Comment Letter I68

From: Cate O'Reilly <catebloem@yahoo.com>
 Sent: Monday, February 1, 2021 6:18 PM
 To: DSD EAS <DSDEAS@sanidiego.gov>
 Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To Whom It May Concern,

My husband and I, Robert & Catherine O'Reilly, along with our three children live at 13770 Stoney Gate Place, San Diego, CA 92128.

We are very concerned about the development proposal for the golf course area that is behind our property line. We actually purchased the home particularly for the green open space behind our property.

Our main concerns are the following:

- The infrastructure of Carmel Mountain Ranch cannot sustain the addition of over 5000 units and the number of people that will bring. Our community already struggles with parking, traffic flow and overcrowding.

- As mentioned above we purchased in this community because of the open space and our children have engaged in sports and activities. Space is already at a premium for these activities. Not to even mention the traffic already at our local grocery stores.

- Our final concern is fire evacuation. If you have even been on our street during Christmas or Halloween you can see how quickly the street becomes jammed and slows to a trickle. Add in 12,000 more people to our community and this will be our everyday scenario.

I am making this short but our concerns are vast. I have submitted the highlights. I believe alternates were proposed that would much better suit the community of Carmel Mountain Ranch.

I appreciate your time in reviewing our concerns and hope that you can make the best decision for our community.

Regards,

Cate O'Reilly, MSW
 Vice President,
 Patient Planning Services
 cate.oreilly@patientplanningservices.com
<http://www.patientplanningservices.com/>

Patient Planning Services is an independent company created by the Cancer Support Community (CSC), the largest nonprofit employer of oncology mental health professionals in the United States.

Response to Comment Letter I68

68 Robert and Cate O'Reilly
 February 1, 2021

I68-1

The City acknowledges the comment as an introduction to comments that follow.

I68-2

To clarify for the commenter, the project only proposes a total of 1,200 units. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and parking.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

I68-3

Traffic was discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Response to Comment O2-11a** regarding parks and open space.

- I68-4** To clarify for the commenter, and as stated in EIR Section 5.13, Population and Housing, the proposed project would introduce approximately 3,180 new residents, not 12,000. Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I68-5** Comment noted.

Comment Letter I69

From: rose trevi <rosetrevis@yahoo.com>
Sent: Monday, February 1, 2021 7:38 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Mom/ Sir,
As a resident of the Carmel mountain ranch for 10 years , I am very concerned about this new development. We do not have enough infrastructure for %25 percent increase of population in this area. This project has environmental impacts on our community.
Thank you
Rose Trevi

Sent from my iPhone

Sent from my iPhone

I69-1

I69-1

Response to Comment Letter I69
69 Rose Trevi
February 1, 2021

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element. Regarding infrastructure, utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to public utility infrastructure were determined to be less than significant with mitigation incorporated.

Traffic was addressed in Section 5.2, Transportation/ Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** for additional information. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I70

From: Sarah Gutz <sarahgutz@gmail.com>
Sent: Friday, January 29, 2021 1:22 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

This letter is in regards to: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

To whomever will listen,

In all honesty, I don't know where to begin to address my concerns about this project. Be it the:

Environmental impact: Obviously adding 8,282 average daily trips to this small community is not going to promote public health through a reduction of greenhouse gas emissions. And the impact to the ability to travel within the community will deteriorate the style of living we've paid to create and promised to be maintained.

Community impact: The addition of 1,200 multi-family units doubles the number of medium density units. The project does not meet one of its specific objectives and instead disrupts the balance of housing types and is a net loss of open space of 61%.

Fire evacuation impact: The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. WHEN we have to evacuate, we just won't be able to.

Affordable housing: My understanding is the proposed Affordable Housing Will Not Offer Ownership Opportunities. There is some limited deed restricted but the vast majority will not be affordable and most will be rental. Housing projects should be affordable and offer opportunity for purchase instead of rental.

Please, consider if this was the neighborhood you've lived in for 20 years and paid to maintain would you let it happen. This level of destruction to the style of living, the environment and lack of benefit is near unforgivable.

Thank you,
 Sarah Gutz
 11331 Provencal Pl
 San Diego, CA 92128
 Resident since 1999

I70-1
 I70-2
 I70-3
 I70-4
 I70-5

Response to Comment Letter I70

70 Sarah Gutz
 January 29, 2021

I70-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

I70-2

Refer to **Master Response 1** regarding density.

Refer to **Response to Comment 02-11a** regarding open space.

I70-3

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I70-4

Comment noted.

I70-5

Comment noted.

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Comment Letter I71

From: Savina Shivaee <savinashivaee@yahoo.com>
Sent: Saturday, January 30, 2021 11:07 PM
To: DSD EAS <DSDEAS@sanidgo.gov>
Subject: [EXTERNAL] Opposition to construction of 1200 homes in the Carmel Mountain Ranch neighborhood

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern,

Pls be advised I strongly oppose the proposed construction of 1200 homes in the Carmel Mountain Ranch golf course development which will adversely affect the quality of life of the current homeowners in the community. 1200 new homes means thousands of tenants and thousands of new cars which will significantly increase the traffic in our neighborhoods. It will also affect the air quality of our community. Furthermore, the public trails which are proposed will be in many of our homes' backyards. This may potentially result in some serious safety issues. Please reconsider the construction of such a large project.

Thank you for your consideration.

Savina Shivaee
 Homeowner at Provencal community

1

I71-1

Response to Comment Letter I71

**71 Savina Shivaee
 January 30, 2021**

I71-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Refer to **Response to Comment 02-7** regarding public safety.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7** regarding air quality. Also refer to **Master Response 4** regarding noise and **Master Response 5** regarding wildfire and emergency evacuation. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I72

From: Stephen & Trish Romero <stephenandtrish13@gmail.com>
Sent: Friday, January 29, 2021 12:03 AM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

We have reviewed the proposed plan and have these concerns.

To start, the proposed 50ft buffer does not comply with other similar developments in the area between adjacent multifamily and single family homes. Carmel Summit Townhomes have about 100ft from the neighboring single family homes. All of which is vegetation, no signs, lights, etc. Other areas, that are at about 50ft between developments, are also pure vegetation, with no signs, lights, sidewalks etc. (Carmel Landing, Jefferson at Carmel Mountain Ranch). The buffer comparison should be between development types, not single family to single family.

Section 3-10 does not explicitly state this buffer applies to R1-1, RM-1-3, RM-2-4, RM-2-5, RM-2-6, and RM-2-7.

Section 5-14.6 Only projects to 2020 school enrollment, which is now and ending in a few months. What about 5 years from now after accounting for the new housing? Source states by 2024 the enrollment will be 735 at Highland Ranch Elementary, over the current capacity of 716 for the district, 675 for the State, which does not even include the development. (PUSD Long Range Facility Master Plan 2020a).

Another example, Shoal Creek in 2025 estimated at 626, while capacity is less at 610 for district loading. Stating the development will not impact is false by these numbers looking further than one year. One wants higher class sizes.

Developer should build less dense housing to not impact classroom sizes.

Section 5.14-13 School loading is by boundaries not overall size. Even if PUSD System has a capacity of 2,205/4,646, that is across all schools. There will be a heavy impact to the Carmel Mountain region. Stating the school system can handle it is misleading to the neighborhood impact. See concerns from section about 5-14.6 about individual School loading example

5.14.15 states no impact 'near term' what timeline is that? One year? What about 5 years or even 10 years?

1,200 new dwellings for Fire and Police to respond to, with no new increase in capacity does have an impact, section 5-14.14 stating low impact appears to be the reports opinion, not real fact. Response times are for the current capacity of residents. What about when more are there?

Sincerely,

Stephen and Trish
Homeowners in Carmel Mountain Ranch on Eastbourne Road, San Diego CA, 92128

I72-1

Response to Comment Letter I72
72 Stephen and Trish Romero
January 29, 2021

The City acknowledges the comment and notes that it pertains to the proposed 50-foot buffer. Refer to **Response to Comment O2-13a**.

I72-2

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. Regarding the portion of the comment which asks about near-term (5 years out) impact to schools, PUSD reviews school facilities and capacities on an annual basis and will allocate funds appropriately to ensure no impact to schools would result. The comment addresses subject areas, which received analysis in the Draft EIR.

I72-3

In accordance with the CEQA Guidelines, impacts related to public services and facilities (police, fire- rescue, and libraries) are evaluated in light of whether the impact would result in a physical change to the environment. Response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal for operations within the affected area because individual development projects cannot be required to fund ongoing operational costs nor can individual development projects make budgetary decisions regarding such funding. The provision of adequate facilities are a planning and facility matter. As

discussed in Section 5.14, Public Services and Facilities, of the Draft EIR, the project would not result in an increased demand for facilities associated with police or fire rescue and impacts would be less than significant. The project would result in a significant and unavoidable impact related to library facilities. Refer to **Master Response 6**.

Comment Letter I73

From: steve <ggao_98@yahoo.com>
 Sent: Monday, February 1, 2021 5:47 PM
 To: DSD EAS <DSEAS@sandiego.gov>
 Subject: [EXTERNAL] Project: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Officer,

What is your response if New York city decides to get rid of central park and start to build housing projects there? I would find it unbelievable.
 I found it is equally unbelievable when I hear the City of San Diego decide to get rid of the golf course and start the project Trails at Carmel Mountain Ranch.
 The project would forever change the characteristic of the San Diego. San Diego is the finest city in the country not because of its dense population, housing project, but because of its natural beauty.
 The project will cause the following harms:
 1. Damage natural environment.
 2. Cause a lot of traffic and congestion.
 3. Cause stress to infrastructure like schools, medical facilities.
 4. Cause huge distract to current resident.
 5. Project cause damage to environment but won't its goal.
 6. City should explore new undeveloped area for its purpose.

Steve
 A resident in North Couty.

I73-1

I73-2

Response to Comment Letter I73
73 Steve (last name unknown)
February 1, 2021

I73-1

Comment noted.

I73-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Regarding damage to the natural environment, the Draft EIR has been prepared in accordance with the appropriate criteria, standards, and procedures of CEQA (California Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Title 14 Section 15000 et seq.). As described in the environmental document, the Draft EIR identified the significant effects caused by the project and identification of mitigation measures, where feasible.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I74

From: Steve <moonsanman@gmail.com>
Sent: Monday, February 1, 2021 8:16 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mountain Ranch new housing development - Project Number 652519/SCH No. 2020039006

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To whom it may concern,

Having lived in CM ranch for last 10 years, I am really concerned about the additional traffic, congestion, and raise health and safety concerned additional rental and housing will bring to the CMR community. This area is already heavily congested with all the people living here. This area is predominately single-family residential area. There are already existing abundant CMR apartments and multi-family housing units available in the area. The proposed multi-family story construction is not compatible with existing homes. Only small part of the new development area meets the needs of current and future city residents on current hilly golf course land. We need to have more open area for parks and open spaces. This new development will cause more congestion and pollution and irreparably harm current and future CMR community. By building new multi family units in CMR community, the width of trails will be too narrow and will create existing homeowner's safety.

Thanks for listening.

I74-1
I74-2
I74-3

Response to Comment Letter I74

74 Steve Moonsanman

February 1, 2021

I74-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Health and safety are discussed in Section 5.8, Health and Safety, of the Draft EIR. Health and safety impacts were determined to be less than significant. Refer to **Response to Comment 02-7** regarding public safety. Refer to **Master Response 4** regarding noise and **Master Response 5** regarding fire safety and emergency evacuation. The comment addresses subject areas, which received analysis in the Draft EIR.

I74-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts.

Refer to **Master Response 1** regarding community character and land use compatibility.

Refer to **Response to Comment 02-11a** regarding open space.

I74-3

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and

unavoidable. Refer to **Master Response 3**. With regard to pollution, pollution-related topics include air quality, which was discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Refer to **Response to Comment O2-7** regarding public safety.

Refer to **Master Response 4** regarding noise and **Master Response 5** regarding fire safety and emergency evacuation. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I75

From: sfischer@san.rr.com <sfischer@san.rr.com>
Sent: Thursday, January 28, 2021 1:52 PM
To: DSD EAS <DSDEAS@san.rr.com>
Subject: [EXTERNAL] CMR Trails Development

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I am a resident of CMR and am in support of housing development in proximity to our transportation hubs. Ideally this should be done with an eye to improved livability.

We also need to broadly improve our public transit systems even if they are initially underused. Build a better system and your patrons will come. I've traveled to many places in Europe and our infrastructure is a relative joke. Good public transit, healthcare, and student loan elimination, public education, would go much further than excess wage increases in reducing economic stresses on our community.

Steven Fischer
858 395 9586
13743 Shoal Summit Dr
San Diego, CA 92128

I75-1 Comment noted.

I75-1

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Comment Letter I76

From: Suchismita Subudhi <suchi052@gmail.com>
Sent: Sunday, January 31, 2021 6:00 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Attn: E. Shearer-Nguyen , Project Name - Trails at Carmel Mountain Ranch/652519, Community - Carmel Mountain Ranch Council District – 5, Environmental Impact Report

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom It May Concern:

We are a small young family of three who own our house here in the very well planned and established community of Carmel Mountain Ranch.
 The very reason we preferred living in CMR instead of new construction around here was how well the community was planned around open green spaces and the elementary schools.

We strongly oppose the plan to build 1200 homes around here. It will highly degrade the quality of life and character of CMR.

Elementary Schools here are already saturated with full capacity of teachers and kiddos. I'm worried about the quality of education and environment for my kid. Let alone the air quality degradation impacts on my kids health due to construction and traffic pollution.
 We already have trouble finding parking spots around common shopping complexes like Costco, Trader Joes and Sprout with the current population.

I'm very worried about the air quality and pollution with potentially additional 1200 to 2400 cars and the exponential parking issues that come along with it.

I'm also concerned about the tall multi family homes around the Single-family homes. We already have planned distance and harmony between single-family homes, townhomes, and apartments. It feels like someone is trying to shove in as many and tall buildings as possible without caring for the existing plan or homeowners privacy.

The creation of 1,200 new multi-family units will create severe negative impacts on the community. We need to protect open and green space and the quality of life around here.
 I strongly urge you to reconsider and not let all the homeowners suffer because of one mismanaged Golf-course property owner.

Thank you so much for your consideration.

Regards,
 Suchi

Response to Comment Letter I76

76 Suchismita Subudhi

January 31, 2021

I76-1

Regarding quality of life, pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment.

Potential impacts pertaining to community character are addressed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1** as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts.

I76-2

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Construction and traffic pollution air quality impacts are discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Also refer to **Master Response 3** with regard to parking.

I76-3

Refer to **Master Response 2** regarding aesthetics impacts. The Draft EIR determined the project's impacts would be considered less than significant.

Regarding privacy, privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.

I76-4 Refer to **Response to Comment 02-11a** regarding open space.

Comment Letter I77

From: Teresa Perez <tperez457@yahoo.com>
Sent: Thursday, January 28, 2021 7:34 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Opposition to CMR Golf course project.

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern,

I have enjoyed living in this area for quite some time. This proposed project will overcrowd and ruin this beautiful community. As it is the school's are crowded, roads are crowded stores are limiting guests. Please keep this land open, consider making it into park or recreation area.

Warm Regards,

Teresa R Perez

[Sent from Yahoo Mail on Android](#)

1

I77-1

Response to Comment Letter I77

77 Teresa R. Perez
January 28, 2021

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. Refer to **Response to Comment O2-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I78

From: Timothy Bunch <timothyabunch@yahoo.com>
Sent: Monday, February 1, 2021 2:08 PM
To: DSD EAS <DSEAS@sanidiego.gov>; DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails At Carmel Mountain Ranch 652519/SCH No. 2020039006

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Security mitigation where open space is adjacent to existing housing is not adequately addressed. The existing fences are 3 ft., tall, steel or stucco covered masonry. The fences were designed for separation of houses from a golf course. Golfers signed in at the clubhouse and were assigned electric carts with GPS tracking. People using an open space are unregulated and therefore the adjacent properties and inhabitants will have diminished security. The existing fencing should be removed (with permission from the HOA) and new 6 ft. tall steel, or stucco covered masonry should be constructed on the applicant's property. Each home owner should be allowed to decide which style of fence to have, as they did when the houses were constructed.

Thank you for the consideration.

Regards,

Timothy A. Bunch
13952 Chicarita Creek Road
San Diego, CA 92128

I78-1

I78-1

Response to Comment Letter I78
78 Timothy Bunch
February 1, 2021

Refer to **Response to Comment 02-7** regarding public safety.

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Comment Letter I79

From: Todd Preece <todd.preece@gmail.com>
Sent: Monday, February 1, 2021 5:35 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello, I'm writing to make known my protest to Project Number 652519/SCH No. 2020039006, (i.e. The Trails at Carmel Mountain Ranch).

I'm a homeowner near the proposed project site since mid-2000 and purchased partly based on the amount of open space in the area. At the time this consisted of a golf driving range and the golf course. Years ago the driving range became the site of more housing and now it seems the last open space area is proposed for the same.

According to the San Diego General Plan "the project site is designated Park, Open Space, and Recreation". It further states: "The General Plan is the foundation upon which all land-use decisions in the City are based. It expresses a citywide vision and provides a comprehensive policy."

As a homeowner, I'm saddened by to potential loss to my property values and the potential loss of yet more open space that could be made available to residents for walking paths or other outdoor activities. Please take into consideration the quality of life for the existing residents.

Todd Preece
 14455 Rutledge Square
 San Diego, CA 92128

I79-1

I79-2

I79-3

Response to Comment Letter I79

79 Todd Preece
 February 1, 2021

I79-1

Comment noted.

I79-2

Comment noted.

I79-3

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not a physical change to the environment.

Refer to **Response to Comment 02-11a** regarding open space.

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Comment Letter I80

From: ttan_92126@yahoo.com <ttan_92126@yahoo.com>
Sent: Friday, January 29, 2021 8:45 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] FW: Carmel Mountain Ranch - Golf Course Development - 10 Days Left!

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi,

I am a resident of Carmel Mt Ranch and living within the community of the golf course. Although I would like to see something develop in the area but I am completely taken back about developing additional 1200 homes. This will decreased the value of our existing home. I moved to Carmel Mt for the peace and quiet and the luxury of retirement. I would like to see yes park instead of more home development. We had additional homes developed when the driving range was removed and now we just can not develop more housing.

Thank you for hearing me out. I am a resident since 2000 and ready to retire in a tranquility community.

Warmest Regards

I80-1

Response to Comment Letter I80

**80 Tricia Tan
 January 29, 2021**

I80-1

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

Tricia

Sent via the Samsung Galaxy Note9, an AT&T 5G Evolution capable smartphone

----- Original message -----

Carmel Mountain Ranch RCA



Dear Tricia Tan,

ONLY 10 MORE DAYS TO MAKE YOUR VOICE HEARD!

Please take a few moments to review and comment on the proposed development of the golf course property. New Urban West has planned 1,200 units, which include affordable housing, and 720 of these 1,200 are slated to be rentals. This plan includes a brand new master association, which is not a part of our current Residential Community Association! There is also talk of open area public trails. The type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other transient issues for our community. The links below will provide you more information.

<http://www.cmrrca.org/index.php/golfcoursematters-generalinformation>

<https://www.10news.com/news/local-news/public-can-now-comment-on-trails-at-carmel-mountain-ranch-development-project>

Written comments on the environmental document must be received by February 8, 2021, to be included in the final document considered by the decision-making authorities. Comments can be submitted to either the following address, E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center, 1222 1st Avenue, MS 501, San Diego, CA 92101, or via e-mail to DSDEAS@sanidiego.gov. Please ensure to include the project name and number in the subject line.

Carmel Mountain Ranch RCA
c/o Walters Management
9665 Chesapeake Dr. Ste 300
San Diego, CA 92123-1364

858-495-0900 office
858-495-0909 fax

- 858-495-0900 - www.waltersmanagement.com -

Comment Letter I81

From: Vadim&Maya <vadimaya@yahoo.com>
Sent: Sunday, January 31, 2021 7:30 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch / Project No. 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

New Urban West's planned 1,200 units development includes affordable housing and will be approximately 60% rental units, as well as a brand new master association (not a part of our current Residential Community Association)! This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other transient issues for our community.
As it is, shopping centers and roads in our area are congested and additional housing will make these worse .
We are firmly against this proposal and urge you to refuse it or downscale.

Sincerely
Vadim Polonichko and Maya Iskandar
13786 Stoney Gate Place
San Diego, 92128

1

I81-1

Response to Comment Letter I81
81 Vadim Polonichko and Maya Iskandar
February 1, 2021

I81-1

Refer to **Master Response 1** regarding density.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I82

From: Vicki Rogers <vrogers54@gmail.com>
Sent: Saturday, January 30, 2021 4:48 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project 652519: Trails at Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,
We are opposed to this proposed project.
This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other transient issues for our community. The negatives far outweigh any possible positives for CMR. Please do not approve this project.
Thank you,
Victoria Rogers
Richard Rogers

I82-1

Response to Comment Letter I82
82 Victoria and Richard Rodgers
February 1, 2021

I82-1 Refer to **Master Response 1** regarding density.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I83

From: Bill <wsburrow@gmail.com>
Sent: Sunday, January 31, 2021 4:06 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Opposition to Carmel Mtn Ranch Abandoned Golf Course Development

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To whom it may concern,

As a resident in Carmel Mountain Ranch, I'm writing to express my disappointment in the vision to reuse the land for high density development.

The infrastructure in place (schools, roads, community law enforcement, noise pollution, etc) are not equipped to handle this type of development.

In addition, this will greatly destroy the property value of the current residents that invested their life savings into purchasing property with the promise to reside next to a golf course, NOT high density development.

Although I believe more housing in San Diego is needed, we should not be taking away green space to do that.

My opinions, as always, will be reflected when I go to ballot.

Thanks,

William Burrow
 12049 World Trade Dr Unit 2
 San Diego CA 92128

I83-1

I83-2

I83-3

I83-4

Response to Comment Letter I83

83 William Burrow

January 31, 2021

I83-1

Comment noted.

I83-2

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

Police protection is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police protection were determined to be less than significant.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**. The comment addresses subject areas, which received analysis in the Draft EIR.

I83-3

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value is not a physical change to the environment.

I83-4

Refer to **Response to Comment O2-11a** regarding open space.

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Comment Letter I84

From: Zeying Ma <zeyingma@yahoo.com>
Sent: Sunday, January 31, 2021 1:04 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mountain Ranch - Golf Course Development - New Urban West

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Sir or Madam,
I am writing to express my concerns on the New Urban West's planned 1,200 units development including 60% rental units.

1) This development will devalue the single family neighborhood, which is unfair to the current residence. A result of that, many people who are needed technology workers/engineers may move out of Carmel Mountain and RB areas.

2) The massive development will significantly increase the crowdedness of the area. It is bad for the environment. If San Diego suburb is destroyed, it makes San Diego a less attractive place in the nation.

3) The development of 60% rental units will not help people in need. The commercial leasing company will maximize its profit, and renters have no control of rent price.

Thank you very much for your consideration in rejecting or modifying this project.

Best Regards,
Zeying Ma

I84-1

I84-2

I84-3

I84-4

Response to Comment Letter I84

84 Zeying Ma
January 31, 2021

I84-1

Comment noted.

I84-2

Pursuant to CEQA Guidelines Section 15064(e) the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value is not a physical change to the environment.

I84-3

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Regarding general impacts on the environment, the EIR was prepared in accordance with CEQA. All potential environmental impacts have been analyzed, and mitigation has been provided where feasible.

I84-4

Comment noted.

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Comment Letter I85

From: Zoya Asgari <zoya.asgari@gmail.com>
Sent: Monday, February 1, 2021 4:28 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

My name is Zoya Asgari and I live at 14424 N Church Square, San Diego, CA 92128.

I am writing to oppose the suggested development of 1200 units in my area. It's unreasonable to increase the population of an already dense neighborhood by 25%. **There are not enough schools, fire departments and amenities for this increase in population.** This is not Sorrento valley or UTC with tons of companies and students in need of apartments. It does not make sense to populate the area with small apartments. This neighborhood will interest families with kids. Schools are already filled in this area. **There is not enough green landscape and traffic is already at its peak.**

This many people, where will they shop? Where do they eat? This will just benefit corporates and developers in this area.

How could you consider this without any studies on the area? plus **how are we supposed to live with construction for a few years in these narrow pieces of land that are under review. Have you thought about the noise and pollution during construction?** this is not an un habitat land, these pieces of land are in between our houses.

Please reconsider this proposal.
Thanks!
Zoya Asgari

Response to Comment Letter I85
85 Zoya Asgari
February 1, 2021

I85-1

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6.**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3.**

Refer to **Response to Comment 02-11a** regarding open space.

Fire protection services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to fire protection services were determined to be less than significant.

I85-2

Comment noted.

I85-3

As demonstrated throughout the Draft EIR, various project-specific technical studies were prepared. These technical studies have been summarized in the Draft EIR, included as appendices, and made available with the Draft EIR document. Noise and air quality were analyzed in depth in Appendix F, Noise Technical Report, and Appendix H, Air Quality Technical Report, of the EIR respectively. Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation.

Refer to **Master Response 4**. Air pollution was discussed in Section 5.3, Air Quality and Odor. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I86

From: Richard Kaung <rkaung@yahoo.com>
Sent: Monday, February 1, 2021 7:27 AM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mountain Ranch Proposed Development Project 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear E. Shearer-Nguyen, Environmental Planner,

As a homeowner right on the prior golf course, We wish to share our deep concerns of the proposed project.

Please consider a different density & fitting demographic development. The proposal will dramatically change the density, real estate price points, look & feel of the community.

The old golf course provides a great opportunity for new development. -But please do not approve one that negatively changes the value and environment of the community. This is private property. Neighborhoods naturally change and evolve - but this is so large and so different than current community - it would be an intentional forced community change. If that is the intent - the city should buy out all the property in the neighborhood and make it a San Diego experiment. Don't force it upon existing private property owners...

Thank you for your consideration.

Kaung Family
Property: 11908 Brewster Court

I86-1

I86-2

Response to Comment Letter I86

86 Richard Kaung
February 1, 2021

I86-1

Comment noted.

I86-2

Refer to **Master Response 1** regarding density. Compatibility with community character was addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1** as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value is not a physical change to the environment.

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Comment Letter I87

From: shahla askari <shahla_askari2000@yahoo.com>
Sent: Monday, February 1, 2021 1:39 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: shahla askari <shahla_askari2000@yahoo.com>
Subject: [EXTERNAL] Project Name: Trails at CMR/652519, Community Area: Carmel Mountain Ranch, Council District 5

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To whom it may concern;

We seriously wanted to oppose the above-named project because it will create additional traffic on our already congested streets, parking problems and other transit issues for our community.

we strongly oppose this development plan detrimental to our health and safety, please stop.

Thank you.

The Askari's

I87-1

Response to Comment Letter I87

87 Shahla Askari

February 1, 2021

I87-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I88

From: Arpita Gupta <guptaarpita1@yahoo.com>
Sent: Thursday, January 28, 2021 8:23 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Nishant Ghai <nishant.ghai@gmail.com>
Subject: [EXTERNAL] Carmel mountain ranch-gold course development(Project No. 652519).

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

As a resident and a homeowner in Carmel Mountain Ranch , I strongly oppose building of any new housing as we already have enough apartments in the areas. Building of more apartments will lead to crowding of our already crowded roads, strip malls and SCHOOLS!
 Please do not let this happen , we deserve better .

Nishant & Arpita Ghai

[Sent from Yahoo Mail on Android](#)

I88-1

Response to Comment Letter I88

88 Arpita Gupta
January 28, 2021

I88-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I89

From: Ali Falahi <alifalahi@icloud.com>
Sent: Tuesday, February 2, 2021 8:54 PM
To: DSD EAS <DSEAS@sanidgo.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch project # 652519/SCH No.2020039006

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Madam/ Sir,
Please do not approve the Trails at Carmel Mountain Ranch.

This project will create Massive environmental damage, add to existing congested traffic, create excessive noise and dust, affect public services, affect fire safety and evacuation issues, affect already crowded schools, affect air quality and

....
Sincerely,
Ali Falahi
11983 Kersey Place
San Diego, CA 92128

Sent from my iPhone

I89-1

Response to Comment Letter I89

**89 Ali Falahi
February 2, 2021**

I89-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Noise impacts are addressed in Section 5.11 of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Impacts to public services and facilities were analyzed in Section 5.14, Public Services and Facilities, in the Draft EIR, in which it was determined that impacts would be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6**.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I90

From: Shai Barkai <shai.barkai@gmail.com>
Sent: Monday, February 1, 2021 11:17 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] RE: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Ms. Shearer-Nguyen and City Council:

I am writing to you today to make my comments and graving concerns to "The Trails at Carmel Mountain Ranch" project as stated above in the subject line.

My name is Shai Barkai and I have been a Carmel Mountain Ranch resident and proud homeowner for 7 years now. My address for reference and proof is 14209 Breezeway Pl, San Diego, CA 92128.

I would like to express in the strongest possible terms my concerns with the proposed development of this project in question. I have been living here long enough to know the neighborhood very well, a neighborhood that was a great success so far and VERY WELL

Response to Comment Letter I90
90 Shai Barkai
February 1, 2021

I90-1 Comment noted.

I90-1

planned. If this project is approved, just by looking at the plans the developer is showing us, this beautiful gem will turn people's lives into nightmares. Let me explain why...

First of all I want to make clear that I am by no means against new housing / affordable housing in our city, on the contrary. The problem is the location of this project and the huge negative impact it would impose on the residents around it, as well as the overall community.

1) Traffic, Traffic, Traffic! The developer wants to add 1200+ units with 3500+ people estimated. People who live here have to deal with heavy morning traffic on Ted Williams parkway ALREADY, whether they need to hop on the I-15 or the 56 freeways. The developer claims that residents would be able to use the transit station to avoid the traffic congestion, but as you & I both know, most San Diegans drive their cars. The transit station has little to no effect on traffic reduction. Adding even 2000 cars (and I'm giving a LOW estimate) would make the traffic of Ted Williams and all the inner little streets connecting to it intolerable. And SURE ENOUGH, even the developer himself recognizes this problem and states in his OWN EIR that this is "UNMITIGATABLE". Well if THAT'S the case... Why are we accepting this??? And I am not even talking about the environmental impact and emissions. I'll leave that to the experts. I am just talking about everyday practicality.

2) The Carmel Mountain Ranch Community is already fully developed. It was never designed to take in this many more people and cram them all in what used to be a golf course. Our schools are already congested with 30+ kids in one classroom. WHERE would all the additional kids go? Our town center plaza's parking lots are already full and it's getting harder and harder to find parking. 2000 additional cars is the LAST thing we need here.

3) Danger of Evacuation in case of a fire: Continuing the concern I explained in item (1) above... what happens in case of emergency evacuation? By definition, cars and other vehicles who will have to rush out MUST go through all the streets of our neighborhood to evacuate. This neighborhood is 99% single family homes and so the streets are not designed to take in this much of a heavy traffic. THIS creates an ALARMING SAFETY CONCERN in my mind. I very much want to believe that the safety of our people is always at the top of all priorities in the eyes of the San Diego City Council and that it should not be compromised because a developer wants to build here! I am urging everyone to take this concern VERY SERIOUSLY.

The bottom line for me, and I am sure the vast majority would join me on this, is that THIS IS NOT THE RIGHT LOCATION FOR THIS KIND OF A MASSIVE PROJECT. If this was a project of 200 new homes, I wouldn't even say a word. But 1600+ dwelling units??? I am sorry... there's just no room.

Thank you so much for taking the time to read my comments and I am all hopes that the council will do the RIGHT thing and PRESERVE the character of Carmel Mountain Ranch.

Respectfully,

Shai Barkai.

↑
I90-1
Cont.

I90-2

I90-3

I90-4

I90-5

I90-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I90-3

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. Also refer to **Master Response 3** regarding parking.

I90-4

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I90-5

Comment noted.

Comment Letter I91

From: Shenyan Gu <gusyan@gmail.com>
Sent: Monday, February 1, 2021 9:30 PM
To: DSD EAS <DSDEAS@sanidgo.gov>
Cc: Troy@wealthanalytics.com <Troy@wealthanalytics.com>
Subject: [EXTERNAL] Misconduct business concern on project :The Trails at Carmel Mountain Ranch(652519/SCH No. 2020039006)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

People like their home to be a very nice place with a good environment. I am one of them and moved to Carmel Mountain a couple of years ago. It was a very nice golf course view in my backyard, but not anymore instead of bushes. The owner purchased the golf course during the 2008 economic crisis, He got a very good deal. Apparently, the owner did not have a long term plan to run the golf course, he just wants to hold the land and sell it at a high price to make a profit.

During the management time, the owner got big fund from city to improve the water-saving system. what the owner to do is that he just put the money into his pocket and shrink the area of grass.

If this project get approved, it will encourage other business man do the similar thing to make profit. There will no golf course in carmel mountain area.

I hope government should stop this misconduct business. Thanks

--
Shenyan Gu
14762 Carmel Ridge RD

Response to Comment Letter I91

91 Shenyan Gu
February 1, 2021

I91-1

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value is not a physical change to the environment.

I91-1

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Comment Letter I92

From: Bharat Singh <bharat.kishore.singh@gmail.com>
Sent: Wednesday, February 3, 2021 10:46 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Member of City council

I am writing to you about the above mentioned project. We strongly oppose this project for following reasons.

1. Loss of open land and park area - with the project we will have net loss of open space.
2. Increased traffic, congestion and parking. Would increase the safety risk for pedestrian and walking school children with additions of lot more traffic within the area.
3. Fire and evacuation risk. with increased number of dwellings and the residents, it will increase evacuation risk considerably.
4. Destruction of community harmony and character.

We hope that you would consider our objections and issues during your decision making for this project.

Bharat & Urmila Singh
 13553 Shoal Summit Dr
 San Diego, CA 92128

Ph - 858-722-1846

Response to Comment Letter I92

92 Bharat & Urmila Singh

February 3, 2021

I92-1

Comment noted.

I92-2

Regarding open space, refer to **Response to Comment 02-11a**.

I92-3

Traffic and transportation hazards are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. Regarding pedestrian safety, Section 13 of the Local Mobility Analysis (Draft EIR Appendix C) identifies which intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The Local Mobility Analysis lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety.

I92-4

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

- I92-5** Compatibility with community character is addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts.
- I92-6** Comment noted.

Comment Letter I93

From: Brent Cottom <b_cottom@yahoo.com>
Sent: Tuesday, February 2, 2021 6:20 AM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] Project: Trails at Carmel Mountain Ranch, Project No. 652519/ SCH No. 2020039006

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Dear Sir/Madam:

The proposed "Trails at Carmel Mountain Ranch" (Project No: 652519/ SCH No. 2020039006) will have a significant impact on the environment. The number of units proposed is 1200 with an expected increase in population over 3,000 people. This would be a 25% increase beyond the 4700 units in this planned community. Such a substantial increase will be a significant impact on fire, police, public schools, public library and recreational center in addition to the increased demand and wear and tear on public utilities and roads. Although not reviewed in the environmental study, this population increase will also have a significant impact on the traffic congestion at the local shopping centers leading to higher greenhouse gases and reduction in air quality. The local facilities were not designed for this population increase, and the plan does not adequately address these concerns.

The proximity to a transit center is not valid justification for increasing population density and not adequately planning for the increase in traffic, parking, and safety issues that occur with increased vehicular traffic and housing. The transit center located at Sabre Springs lacks the bus routes required for someone to rely on for their primary transportation. The majority of the buses are for transportation downtown during the week and not efficient for transportation to any other

I93-1

I93-2

Response to Comment Letter I93

93 Brent Cottom
February 2, 2021

I93-1

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Refer to **Master Response 3** regarding congestion and proposed roadway improvements.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Responses 7 and 8**.

Utilities and infrastructure impacts are discussed in Section 5.15, Public Utilities, of the Draft EIR. As discussed in this section of the Draft EIR, impacts to public utility systems were determined to be less than significant with mitigation incorporated. Impacts to public services and facilities are addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and

unavoidable due to the impact on library facilities. Refer to **Master Response 6** regarding schools and library facilities. The comment addresses subject areas, which received analysis in the Draft EIR.

- I93-2** Transportation is discussed in Section 5.2, Transportation/Circulation of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. Additionally, regarding bicycle and pedestrian safety, Section 13 of the Local Mobility Analysis (Draft EIR Appendix C) identifies which intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The Local Mobility Analysis lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety.

Additionally, pedestrian and bicycle safety is addressed in Section 5.2, Transportation, of the Draft EIR. As stated therein, the project does not include any elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project's circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. The project's internal roadway network would consist entirely of private roadways. Roadways would be designed as complete streets that accommodate automobiles, bicycles, pedestrians, low-speed vehicles, neighborhood electric vehicles (NEVs), and golf carts. Internal roadways would consist of private drives with and without parking,

location. I rode the bus frequently before the pandemic and the majority of the riders drove to the facility. Locating additional housing next to the transit center will not increase the number of bus riders nor reduce the number of vehicles. The vast majority of the bus riders did not even live in Carmel Mountain Ranch. Increasing the number of bike repair stations and paths will also not reduce vehicle usage. Our community is located at elevation while the transit center is located at lower elevation. Any commute to the transit center or even the local businesses will require biking or walking up a significant elevation grade. This elevation will prevent the majority of people from ever using a bicycle for any form of transportation. I speak from experience and know most people will not take the effort to bike at this location. Biking is also a significant hazard due to the high vehicle traffic and speeds in the community. Even with increased "trails", the road will still be the primary method and increasing the population and vehicles will significantly increase the safety risk.

I don't agree with the assessment that the development impact on the visual effect and neighborhood character will not be cumulatively considerable. The proposal includes building medium and high-density housing up to 4 stories, and even up to 6 stories in a proposed alternative, on relatively narrow parcels of land between single-family housing on significant elevations. The current developed community has housing of multiple stories, but the housing was located at lower elevations where the distinction between the housing types were not obvious. Locating any housing beyond 2 stories will be highly noticeable and impact the aesthetics of this community because the previous fairways are located between single-family housing. I also disagree with the comment that the developed areas will not be highly visible. This development will be easily identified from I-15 and any of the surrounding areas. The patchwork development will be clearly visible from the surrounding communities of Rancho Penasquitos and Poway since our community is at elevation.

The development will have a major impact on the environment, noise, and local air quality. The developers' claims of retaining most of the open space and adding public trails are misleading. Repurposing the existing cart paths from the golf course should not be identified as trails as these concrete paths will be the same as sidewalks in any urban area, which already allows access throughout the community. Opening the current cart paths today will add little value to improving the open space of this community. Any development will solely take away the open space that currently exists and that is open space that will never return. The developer plans on keeping some of the fairways undeveloped but these fairways are located on the outskirts of the community and would not be readily accessible. Visiting these locations would require a vehicle for most of the individuals in this community.

The development may not impact a threatened species but will further reduce the native birds and animals in this area. The development has been proposed in a relatively small area around the clubhouse that will result in more ambient noise from building air conditioners and significant increase in noisy vehicle traffic. This will also lead to higher localized greenhouse emissions and reduced air quality. Building on open land will also result in significantly more storm water runoff than is currently absorbed by the current open space contributing to pollution in the ocean.

The development proposed will have significant impact on the Carmel Mountain Ranch community and surrounding area. Hopefully, you take these concerns into consideration and deny this development or require modifying the development to a more realistic number of units. Increasing the population density next to a transit center without addressing the impacts on the existing community will not improve San Diego's housing crisis nor improve mass transportation. It will only lead to more traffic congestion, pollution, noise, and degrade the benefits of living in a suburb of San Diego. San Diego needs to improve the conditions in the city of San Diego and not push the city of San Diego into surrounding communities.

Thank you for consideration,

Brent Cottom

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and a sidewalk along one side separated from the roadway by a five-foot-wide landscaped parkway.

Aesthetics impacts were addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Refer to **Response to Comment 02-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

193-5

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated. Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Air quality impacts were discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than

significant. Refer to **Master Response 7**. Water quality is discussed in Section 5.18, Water Quality, of the Draft EIR. Water quality impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

I93-6 Refer to **Response to Comments I93-1, I93-4, and I93-5**.

Comment Letter I94

From: Brigid Hernandez <brigid22@sbglobal.net>
Sent: Tuesday, February 2, 2021 3:18 PM
To: DSD EAS <DSDEAS@sanidago.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern,

As resident of the Carmel Mountain Ranch community and a homeowner that owns a home located and oversees the former 8th hole of the Carmel Mountain Ranch County Club, I am writing this email to express by dissatisfaction with the proposed community plan for The Trails at Carmel Mountain Ranch presented by NWU. The blight that the closed course, weeds and fencing has changed our community and we are in need of action to be taken- I have significant concerns of the proposed plans for The Trails.

-Size- the proposed 1200 units being squeezed into one way into a cul-de-sac development isn't consistent with the existing community. Of example- on the 8th fairway, entrance would be in way in and out, with the entrance of Shoal creek. A very busy street that school children walk in. There is a bus stop located on this street also. The proposed 110 townhomes in this one area alone will impact traffic and safety concerns. The townhomes would also be 3 stories tall, where the surrounding homes are 2 stories tall.

-Traffic- concerned about overall traffic in area with this development. We live on Stoney Gate Pl which is the street that goes to 18th fairway, which is proposed to have 300 apartments. As a street, we had to install speed bumps to slow the existing traffic down. Add in the apartments, and this problem increase.

-School impact- Shoal Creek Elementary already has multiple grades waitlisted. Middle school students are bused. There has been no information or impact study on local schools, over crowding or busing provided- or funding for infrastructure from the developer.

I agree that some sort of action needs to be taken, I don't agree with the proposed plan. I think that there is a way to develop the area with and create housing that can blend into the community, be more neighborhood friendly and be less invasive. In Poway, the development of The Farm took into account the needs and wants of the current community to present a project that can add housing in a tasteful way, integrate with the current plan, and would gain the support of the residences that live around it by providing community resources. That plan was accepted by the voters of Poway by an overwhelming response. We need a plan that works with the community- not against it.

I hope you take into account our feedback.

Brigid Hernandez
 14074 Stoney Gate since 11/2008

I94-1

I94-2

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I94-5

Response to Comment Letter I94

94 Brigid Hernandez
 February 2, 2021

I94-1

The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

I94-2

Refer to **Master Response 1** regarding density.

Traffic and transportation hazards are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts would be significant and unavoidable. Refer to **Master Response 3**.

Visual character and project bulk and scale are discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.

I94-3

Traffic and transportation/circulation hazards are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts would be significant and unavoidable. Refer to **Master Response 3**.

I94-4

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

I94-5

Refer to **Response to Comment I94-2**.

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Comment Letter I95

From: Cheryl Pryatel <clpryatel@roadrunner.com>
Sent: Tuesday, February 2, 2021 5:55 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To DSD staff and , E. Shearer-Nguyen, Environmental Planner,
 I own a house on Werris Creek Lane and am respectfully submitting my comments on the EIR for the proposed project:
 Trails at Carmel Mtn Ranch, Project number 652519/SCH No. 2020039006.

The Project is not in compliance with the EIR in so many areas! The areas of MOST concern to me are the following:

>**Proposed Multi-Family Multi-story Construction is Not Compatible With Existing Homes**
 Project Objective 1, Section ES.3 **not met** - as the range of housing types are not compatible with the adjacent
 established residential communities. I don't know how anyone can look at placing multi-story units that are 37' and 48'
 high in basically the backyard of homes, with such a small buffer of 50', and think this is compatible with the existing
 community. There is no way to hide with trees these oversized buildings and make they look compatible with the

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I95-1

I95-2

Response to Comment Letter I95

95 Cheryl Pryatel
February 2, 2021

I95-1

The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

I95-2

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**.

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to Master Response 3.

Finally, refer to Master Response 1 and Table 5.1-3 of the Draft EIR regarding Community Plan consistency.

community. Those houses that abut these very tall multi-family units will have no privacy and the sound and traffic cannot be mitigated.

Carmel Mountain Ranch Community Plan under Design Compatibility page 83 paragraph 1, "the choice of building Heights will be geared to the silhouette of the terrain: higher buildings are planned on lower ground particularly within the Town Center area". The placement of these units are not compatible with the existing Community Plan. Other Apartment units in the Community, such as the Jefferson Apartments, have a 100' separation from the neighboring condominiums and 200' from homes. Homes that have a 50' or less separation are of an equal height and type, single family home to single family home.

>Project Building Types and Setbacks Make it Incompatible with Existing Community

Project Objective 7, section ES.3 **not met** – Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to **ensure that the project is cohesive and respectful of existing properties.**

The proposed housing types are not compatible with existing housing per the Community Plan. The Plan should have 2-story single family housing types at upper elevation and core areas of existing CMR development to create appropriate and compatible densities. Any 3-4 story apartments should match style and locations as per CMR plan with 75-100' landscape buffers.

The documents provided that have imagery, sections and drawings provided in guidelines are template and not of actual conditions. The City and Community need actual to-scale sections in guidelines so can be reviewed accurately and all can agree on the final outcome versus some flexible guideline and rendering being provided.

Project buffer zones need to 75'-100' so the first 50' buffer can be 100% landscape and a 12' wide community trail can occur afterwards. No vehicular or roadway deviations should be allowed within first 50' of the buffer area so as to provide for existing homeowner's safety, security, noise and privacy issues!

>The proposed Project is Not Cohesive or Respectful of the Existing Community

Project Objective 7, section ES.3 **not met** - The Trails at Carmel Mountain is not cohesive nor respectful of existing properties

- The project is not cohesive in that it infills former golf fairways spread throughout the Carmel Mountain Ranch Community.
- It is not cohesive in that the density and type of housing will stand out instead of blending in with the community.
- The project is not respectful of existing properties as it is 100% multi-unit buildings, the buildings are all three and four stories tall, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing homes. Please see page 9 of the Design Guidelines for density and heights of the proposed buildings and page 14, Transitions, Buffers, Edges and Screening for buffers and circulation elements. In addition, the EIR alternatives create possibility that apartments could be even taller (5-6 story) in Unit 9, which would require additional mitigative efforts.

>Rules for Project Alternatives Evaluation are not inclusive of an appropriate option, mitigate the impacts of the Project and blend it better with the existing community. Section ES.8 Project Alternatives

The EIR is an informational document that is intended for use by City decision-makers and members of the general public in evaluating the potential environmental effects of the project. This project is a very controversial development that is disrupting the lives of a well-established community of over 15,000 residents and businesses by one owner. The Project is a profiting making by an attempt to rezone the existing property which would then allow a shocking increase in population that will change the culture, value, and traffic for the existing development forever. It is incompatible that the selection of alternatives chosen in this EIR is governed by a so-called "rule of reason" (required to evaluate only those alternatives necessary to permit a reasoned choice).

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Refer to **Response to Comment 02-7** regarding public safety. Also refer to **Response to Comment I95-2** above regarding noise, privacy, and compatibility with the Community Plan.

I95-4

Refer to **Master Response 1** regarding density.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. The comment addresses subject areas, which received analysis in the Draft EIR.

I95-5

Refer to **Master Response 10** regarding alternatives.

An appropriate and fairer option is that **one of the alternatives should be sought that mitigates the impacts and the project blend better with the community plan and existing development.** This is especially true since the focus of this analysis is to determine 3 items (1) whether the alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of the alternatives, and (3) whether the alternatives meet all or most of the basic project objectives.

>Reduced Density Alternative Should Be Much Smaller to be compatible with the existing community. EIR Section ES.8.2 Reduced Density Alternative

This alternative would have the same footprint of the proposed project, but the density would be reduced. This would reduce the number of multi-family homes proposed from 1,200 to 825 (353 4-story apartments, and 472 3-story for-sale townhomes). This alternative would also reduce the estimated number of people anticipated to occupy the new development from 3,180 people to 2,186.

Estimating that **2.65 people per unit is not realistic** in today's society and economy. In my two bedroom home on Werris Creek Lane, a family of 4 moved in and then had 2 additional children, totaling a family of 6 that lived there for several years. Perhaps that is an outlier, but with adult children moving home and housing being used by multiple families to address the high costs to live in San Diego, 3-4 for people per is more likely. With the present housing units proposed, it is likely that 3600-4000 residents are being proposed to live in this Project. A 30% plus increase in population is very drastic and squeezing it all into 50 acres (7% of total CMR property) would be irresponsible planning-wise and change the VMTs and other significant numbers even more dramatically.

>Project Consistency is not in compliance with Urban Design Element of SD City General Plan Table 5.1.2 "Project's Consistency with City of San Diego's General Plan" Part B Distinctive Neighborhoods and Residential Design Goals.

Pg. 174 Policy UD-B.2 "c. Provide transitions of scale between higher-density development and lower density neighborhoods."

- The existing Project **does not have any transitions** of scale between higher and lower density development.

Pg. 173 Policy UD-B.1 "a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development."

The Trails Project **does not match the scale** of the existing homes since most are 2 story single-family homes.

>>VMT Mitigations Using Bicycles on Trails Ignore the health and safety issues.

The **mitigation option regarding VMT impact on transportation and circulation are not be effective in the location.** On table 5.2.2 outline two measures of mitigation. An onsite bicycle repair station and 600 short-term bicycle parking spaces – There are multiple problems with this mitigation measure.

The Trail designs have not been evaluated as being ADA compliant. It is not appropriate to include the trails as a solution of walkability if they are **not ADA compliant**.

The safety of the walking paths has not been evaluated to be compatible with walkers (seniors and families using the trails), bicyclists, and mountain bikers. The varying speeds of the walker, casual bicycle rider, and the mountain bikers makes it unsafe on these small paths. With widths varying from 5 to 10 feet, and some parts surfaced with Decomposed Granite, a **bike/walker collision should be expected and is unacceptable!**.

>Local Mobility Analysis and EIR Do Not Include Project Impacts on I-15 and SR-56

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Refer to Master **Response 10** regarding alternatives. Additionally, as noted in Section 5.13 of the Draft EIR, there are multiple sources for estimations of a "person per household" rate of calculating the anticipated population increase of the project. The analysis contained herein conservatively uses the SANDAG 2050 regional growth forecast rate for the Carmel Mountain community for year 2035, which is the highest out of each forecasted year.

I95-7

Refer to **Master Response 1** and Draft EIR Section 5.1, Land Use regarding General Plan consistency. Regarding consistency with surrounding land uses, also refer to **Master Response 1 and 2.**

I95-8

Transportation and vehicle miles traveled mitigation is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation impacts, vehicle miles traveled mitigation, and ADA accessibility.

Regarding bicycle and pedestrian safety, this issue is addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. As stated therein, the project does not include any elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project's circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. The project's internal roadway

The Draft EIR and the Local Mobility Analysis (App. C) are deficient because they do not present or analyze the impact of increased traffic on relevant Interstate 15 and SR-56 segments. Interstate 15 is completely built out in this area and there is no publicly known funded or scheduled upgrade to SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical.

Some of the critical segments are I-15 Northbound from Poway Road to SR-56; I-15 Northbound from SR-56 to Carmel Mountain Road; I-15 Northbound from Carmel Mountain Road to Camino Del Norte; I-15 Southbound from Camino Del Norte to Carmel Mountain Road; I-15 Southbound from Carmel Mountain Road to SR-56; I-15 Southbound from SR-56 to Poway Road; SR-56 Eastbound from Rancho Penasquitos Boulevard to I-15; and SR-56 Westbound from I-15 to Rancho Penasquitos Boulevard.

The Local Mobility Analysis at pdf pages 47-70, and the **entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs on these critical segments, and the Draft EIR is therefore deficient.**

>Health and Safety

Existing Conditions Impacts on Health and Safety

5.8.1 Physical Conditions: Analysis of issues in and around the property:

The former golf course used various chemicals, herbicides, pesticides, petroleum products and had an underground storage tank for gasoline.

-The EIR does not indicate that soil tests were done at the maintenance area and or spot checked at each fairway for pesticide contamination. Any residual contamination would create a risk of fugitive dust during grading and other phases of construction.

Pg. 404 states:

"... a single 500-gallon underground storage tank (UST) containing gasoline, which was installed in 1989 and removed in 1993, "no detections were reported in soil samples collected beneath the UST and analyzed for total petroleum hydrocarbons"

"... One additional soil sample was also analyzed for TPH; volatile organic compounds (VOCs); benzene, toluene, ethylbenzene, and xylenes (BTEX); and total recoverable petroleum hydrocarbons (TRPH). Minor detections of 1,1-dichloroethene (DCE) at 1.2 milligrams per kilogram (mg/kg) and toluene at 4.1 mg/kg were reported. **The DEH Site Assessment and Mitigation (SAM) Program reviewed the soil analytical results and determined that no further action was required.**"

If the City or Developer had read the report, the County of San Diego SAM Program notes that this determination was made based on the existing Land Use of a golf course. **The Closure for No Further Action must be reevaluated for residential land use.**

>Pesticide Contamination Risk

Pg. 405 states: "a recognized environmental condition (REC)..."

"The ongoing pesticide application on the site leading to accumulated residual pesticides in soils would be considered a REC."

The EIR fails to state if each fairway that will be disturbed by excavation or grading was statistically sampled to check for chemical/pesticide residue in the soil. As an REC, plans must be required to identify and mitigate any airborne contaminants during excavation and grading, especially since occupied residential housing is within 50' of these areas. This soil contamination issue and REC is not noted in the Air Quality Section.

>Public Safety Issues Presented by Tunnels Are Not Addressed

When evaluating the Project's Consistency with City of San Diego's General Plan (Table 5.1.2 (EIR Pg. 170) Urban Design Element Policy UD-A.17, the Safety of the Tunnels **is not addressed**. The General Plan Goal/Recommendation is:

"Incorporate crime prevention through environmental design measures, as necessary, to reduce incidences of fear and crime, and design safer environments."

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network would consist entirely of private roadways. Roadways would be designed as complete streets that accommodate automobiles, bicycles, pedestrians, low-speed vehicles, NEVs, and golf carts. Internal roadways would consist of private drives with and without parking and a sidewalk along one side separated from the roadway by a five-foot-wide landscaped parkway.

With regard to traffic along I-15 and SR-56, the City's TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Additionally, for clarification, the City notes that average daily trips and a level of service analysis, as well as the Local Mobility Assessment prepared for the project, are not for CEQA impact determination purposes. Rather, traffic from a CEQA perspective is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Potential soil contamination was addressed in Section 5.8, Health and Safety, of the Draft EIR. Soil tests and soil sampling have not occurred at this point; however, should any hazardous materials be encountered or otherwise be required to be removed, it would be done so in accordance with applicable regulatory requirements, which would ensure impacts related to hazardous materials would be less than significant. The Draft EIR determined that potential hazards related to soil contamination would be less than significant with compliance with applicable regulatory requirements and documents.

Moreover, as stated in Section 5.8, Health and Safety, the project would be required to comply with the County of San Diego Department of Environmental Health (DEH) Voluntary Assistance Program (VAP) as a condition of project approval. The VAP provides for consultation, project oversight, and technical/environmental report evaluation. This process includes the preparation and review of a Soil Sampling Plan and Hazardous Materials Contingency Plan. If the technical information, findings, and recommendations in the reports submitted through the VAP demonstrate that human health and the environment are adequately protected, a letter of "No Further Action" or "Concurrence" would be issued. If the technical reports show potential harm to human health or the environment a mitigation and/or remediation plan will be prepared and submitted to the County for review and approval. Based on this process, the Draft EIR concluded that the project would not expose people to toxic substances or result in hazardous emissions.

I95-11 Section 5.8, Health and Safety, of the Draft EIR addressed potential contamination issues. Section 5.8.2 specifically addressed the potential for previous pesticide use and the potential residual pesticides within soils. As explained therein, compliance with the County's Department of Environmental Health Voluntary Assistance Program (DEH VAP) program would ensure that no one would be exposed to toxic substances, such as soil contamination from previous uses on the site, including pesticides and herbicides. Impacts would be less than significant. Also refer to **Master Response 7** regarding the Health Risk Assessment prepared for the proposed project.

I95-12 To clarify, the project's consistency with General Plan Policy UD-A.17 is addressed in Table 5.1-2 of the Draft EIR.

The tunnels are secluded and were previously patrolled daily by golf course maintenance staff. **Plans need to be created on how to address the safety issues with the tunnels.** :

- lighting since the tunnels are 130' to 185' long
- how graffiti, litter, drinking and drug use are deterred
- How homeless are deterred from using the tunnels as shelter.

Another option to be evaluated is that the tunnels are removed and turned into open paths and use existing intersections as appropriate.

>EIR Incorrectly Minimizes the Impacts of the Project Building Heights
Section 5.1.3 Impacts Analysis, Issue 2:Impact of deviations: (EIR Pg. 121)

EIR analysis incorrectly states "In the instances where maximum building height is greater than 40 feet, it is likely that differences in grade and topography would not result in a substantial visible difference between existing and proposed development. Similarly, variations in lot area, setback, width, depth, and frontage would not result in development that is substantially visibly different from the surrounding community"

The project would be substantially different than existing community. Based on elevations shown in the Vesting Tentative Map set, most of the graded building pads are close in elevation to adjacent existing homes. The golf course is surrounded by 2 story single family homes whereas The Trails are 100% multi-family units, 3-4 stories in height with greater heights and densities than the surrounding existing development.

>Wildfire

Fire Evacuation Analysis Does Not Fully Reflect Project Impacts

The Draft EIR's treatment of fire evacuation ignores historical data. The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers.

The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. There are recent high wind-driven ember fires, with mass evacuations ordered, and clogged evacuation routes. This data must be presented and considered along with the additional impact of 3,180 additional residents and their vehicles.

It is not acceptable to simply state in the Draft EIR that the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired (pdf page 613-4), or that "For emergency evacuation, the EOP identifies I-15 and SR-56 as emergency evacuation routes in the vicinity of the project site. Portions of the project site are located adjacent to I-15 to the east and to the northeast of SR-56. Per the VMT Analysis (Appendix G to this EIR), the proposed project is anticipated to add 7,928 average daily trips to and from the project site." (pdf p 613), without further data or analysis.

The County EOP does in Annex Q, Evacuation, p. 16, provide a formula for determining evacuation times. The recent high wind-driven ember fires and CMR evacuation issues should have been studied and should have produced data available to the City and developer. **The Draft EIR needs to get this data or produce it if it has not been compiled, and add the additional impact of 3,180 additional residents and their vehicles to determine the true threat to the community of this massive project.**

These comments are respectfully submitted and I look forward to your response to each item.

Thank you
Cheryl Pryatel

Werris Creek Lane

 Virus-free. www.avast.com

195-12
Cont.

195-13

195-14

195-13

As determined in Section 5.1, Land Use, of the Draft EIR, the project would be consistent with this General Plan Policy. Refer to **Master Response 1**. Specific to the issue of the pedestrian tunnels, the analysis for General Plan Policy UD-A.13 included in Draft EIR Table 5.1-2 explained that, the project would incorporate safety lighting throughout the project site for security purposes. Public spaces (i.e., privately owned recreation amenities with a Recreation Easement recorded over them) would also be clearly marked and would be open for public use during designated hours. However, pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours.

Building heights were discussed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's aesthetics impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR, for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts.

195-14

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Comment Letter I96

From: C. L. Hoang <clhsdca@yahoo.com>
Sent: Wednesday, February 3, 2021 11:32 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Greetings,

My name is Chinh "Jim" Hoang. I'm a homeowner and have resided at 13580 Esprit Ave. in Carmel Mountain Ranch since 1992.

After reviewing the Draft Environmental Impact Report (EIR) for The Trails at Carmel Mountain Ranch (CMR) Project as proposed by New Urban West (NUW), I would like to respectfully voice a few of my main concerns about this project.

1. Project's Objective 1, Section ES.3 states: "To provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities."
It appears to me that this objective is not met for the following reasons:

Response to Comment Letter I96

96 Chinh "Jim" Hoang
February 3, 2021

- I96-1
- The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.
- I96-2
- Refer to **Response to Comment I95-2**.

- The range of housing types is clearly not compatible with the adjacent established residential communities. The project is 100% multi-family 70% of which are apartments, whereas CMR currently has just 47% multi-family with 24% apartments. The project has zero single-family homes as compared to 53% for CMR.
 - The project proposes 3- and 4-story buildings at 37 to 48 feet height in the middle of (and at roughly the same elevation as) single- or two-story homes, with minimum setback of 50 feet from the existing property lines.
 - This is in contrast to the existing apartment buildings in CMR, which are placed at lower elevation so as not to tower over single family homes. These existing apartments are also built on the outskirts of communities near the main roads, and not among rows of single-family homes as proposed by NUW.

2. In the Summary of Significant Impacts and Mitigations, NUW admits that it is very unlikely the project would meet the city and state targets for VMT, and that the project would have a significant (and negative) impact in this respect. In this day and age where our whole nation is gearing up to make tremendous effort and sacrifice in order to alleviate the problem of Greenhouse Gas Emissions, this project would represent a big step in the wrong direction.

This negative conclusion was arrived at even with the analysis focusing only on surface road traffic and completely ignoring the impact of increased traffic on relevant segments of I-15 and SR-56. I-15 is completely built out in this area and there's no publicly known funded or scheduled upgrades to SR-56. The impacts of increased traffic on an already overburdened I-15 and SR-56 are thus significant and cannot be ignored as they will add to the overall impact of the project, which will be even greater than acknowledged in the EIR. NUW's proposed mitigation of using bicycles on trails is not a practical one given the very hilly nature of the community, the narrowness of the proposed trails, and the gravelly terrain of decomposed granite.

3. Project's Objective 7, Section ES.3 states: "To ensure that the project is cohesive and respectful of existing properties." This objective is not met for the following reasons:

- The project is not cohesive because it infills individual golf fairways spread throughout the community. Also the proposed density and type of housing (3- or 4- story multifamily) will stand out instead of blending in with the community (one- or 2-story single family houses).

- The buffer zones should be 75'-100' with first 50' landscaped as per CMR plan (instead of 50' buffer with 15' landscape as proposed). In addition, proposed new driveways and allowed parking will be only 30' distance from existing homes, where there is none now.

4. The project claims to support a City of Villages Strategy consistent with the City of San Diego's General Plan. But:

The glaring omission here is the word "**walkable**." Per page ME-5 of the Mobility Element of the City of San Diego's General Plan: "The strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-used, and walkable villages that are connected to the regional transit system."

NUW left out the word "**walkable**" (less than one-half mile, per page ME-6) in their statement because they well realize that a large portion of CMR is NOT a compact, walkable community.

The Community Plan for CMR was approved in 1984, 18 years before the City of Villages Strategy was approved by the San Diego City Council. The Transit Center was added to the southwest corner of CMR only in 2014 is 1.4 mile (and 130-foot rise) from the Community Town Center.

I could go on even longer, but I will wrap up here with the four main issues listed above. We residents at Carmel Mountain Ranch are extremely concerned, rightfully so I think, about the significant (and very real) impacts to the environment due to this project, and we hope you will take a long, hard look at the Environmental Impact Report as well as our collective feedbacks in making your decision. Your important decision will have a great and lasting impact not only on our community of Carmel Mountain Ranch but also on the future direction of responsible growth for San Diego.

Thank you for the opportunity to have my voice heard.

Chinh "Jim" Hoang
 13580 Esprit Ave
 San Diego, CA 92128

I96-3

Transportation is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Additionally, the TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. Additionally, refer to **Response to Comments 02-30** through **02-36**.

I96-4

Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion pertaining to consistency with applicable land use plans and policies including the City's General Plan and the Community Plan.

I96-5

Refer to **Response to Comments 02-20** through **02-29**.

I96-6

Comment noted.

Comment Letter I97

From: Dawn Nowlin <d.nowlin@sbcglobal.net>
Sent: Wednesday, February 3, 2021 5:47 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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RE: Vehicle Miles Traveled; Appendix G of EIR

Dear Development Services Dept.,

I do not support The Trails project due to significant increase in vehicle miles traveled (VMT) and the impact this will have on traffic congestion, noise, green-house gasses, and pedestrian/bicycle safety. Appendix G of the EIR expects an increase of 32-43% VMT/Capita above the threshold of 16.2 and cites the Trails project as producing a "significant and unavoidable" impact adding 8,282 average daily trips to CMR. The EIR also places the project in Mobility zone 2 when, in fact, the majority of the land for proposed development is in Mobility zone 4! The EIR is *biased* to the developer to more easily comply with VMT reducing measures based on zone 2 criteria. The VMT EIR proposes several mitigating options (Table 5.2.2, p. 14) that, though noble, will not reduce the VMT impact since they will get minimal use in CMR. The majority of suggestions focus on provisions for bicycles and one pedestrian rest station. These are not practical solutions to mitigate increased VMT.

CMR is not a bicycle friendly neighborhood:

1) Hills with grades up to 11% exist on multiple roads accessing the heart of CMR. Most notably, Carmel Ridge, Windcrest Ln. at both entries, Stony Gate Pl., Seabridge Ln., & Chestnut Hill. The hills are even steeper within the current grade of the golf course. Biking will not likely be easier on the trail system proposed by New Urban West.

2) The VMT mitigating option for "on-site shared bicycle fleet" around Unit 9 is located at the highest elevation site of CMR (802 feet above sea level). It's a grand idea to provide bikes, yet riders will be reluctant to return the bicycles because of the hills. It is impractical that these will be electric bikes. Who will be responsible for rounding up the bikes abandoned in CMR?

3) The 4.89 miles of existing golf course trails that are included in the proposed 6.74 miles of total walking/biking trails are not interconnected and do not directly navigate to amenities and the transit station. The walk/bike path cannot be conjoined due to existing homes. Commuting for shopping or work will primarily be on surface streets and not on the trails. The plan is for decomposed granite pathways, which will erode and be muddy in the rains, prohibit comfortable transit of any kind. Thus, bicycling or walking is not a practical option for residents to support reduction of VMT.

4) Surface streets to public amenities have high speed traffic (posted 45 – 55 mph), and vehicle volume making them risky for bicyclists. A 32-43% increase in the number of cars on the road will further erode pedestrian and bicycle safety on these already busy streets.

5) Three bicycle repair stations are suggested for a 4.5-point reduction (3 x 1.5) in VMT score. A recreational bicyclist generally has minimal knowledge on bicycle repair. These stations will be under-utilized at best and should not garner a 4.5 point reduction.

I am an avid road bicycle rider that clocks 50 – 100 miles per week. Unfortunately, I rarely start a ride from home for the reasons above. It's not as safe as other locations nearby and I have the challenge of a big hill at the end of my ride no matter which route. Not fun even for a fit cyclist!

The last page of Appendix G says it all. "Since the Project is not able to guarantee specific VMT reductions associated with the above VMT reduction measures, the Project will continue to have a significant and unavoidable VMT transportation impact".

Please consider my concerns for this development.

Response to Comment Letter I97

97 Dawn Nowlin
February 3, 2021

I97-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Impacts related to noise were addressed in Draft EIR Section 5.11, and impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**. Greenhouse gas emissions were addressed in Section 5.7, and impacts were determined to be less than significant. Refer to **Master Response 8**.

Regarding bicycle and pedestrian safety, this issue is addressed in Section 5.2, Transportation/Circulation of the Draft EIR. As stated therein, the project does not include any elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians due to a proposed, non-standard design feature. The proposed project's circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. The project's internal roadway network would consist entirely of private roadways. Roadways would be designed as complete streets that accommodate automobiles, bicycles, pedestrians, low-speed vehicles, NEVs, and golf carts. Internal roadways would consist of private drives with and without parking and a sidewalk along one side separated from the roadway by a five-foot-wide landscaped parkway.

- | | |
|--------------|---|
| I97-2 | Comment noted. |
| I97-3 | Comment noted. |
| I97-4 | Regarding trail maintenance, all trails would be maintained by the Master HOA but would be publicly accessible. A public recreation easement would be recorded on the trails to ensure public access. |
| I97-5 | Refer to Response to Comment I97-1 regarding pedestrian and bicycle safety. |
| I97-6 | Comment noted. |

Comment Letter 198

From: Dawn Nowlin <d.nowlin@sbcglobal.net>
Sent: Wednesday, February 3, 2021 5:38 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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RE: Local Mobility Analysis; Appendix C of EIR

Dear Development Service Dept.,
I do not support The Trails project based on the **Local Mobility Analysis** of the EIR (Appendix C). The document does not provide analysis for traffic flow onto SR-56, nor does it acknowledge that MTS public transit to major job sites via SR-56 is lacking. The increased housing density from The Trails and 11 new projects in Rancho Penasquitos will severely impact SR-56 mobility and the quality of life in CMR.

1) The LMA is focused mainly on community road access and does not provide any review of traffic flow to SR-56 (a meager 4-lane Hwy). SR-56 is the main artery for a substantial workforce and college student travel to UCSD, Sorrento Valley, Torrey Pines science centers, Genesee medical centers, and businesses in the Golden Triangle.

2) San Diego Metropolitan Transit System (MTS) does not provide transportation east/west along SR-56 or SR-52 to access major skilled worker job hubs! MTS effectively provides regional transportation service along with express routes for the I-15 corridor only (p. 89; Fig. 19). A significant number of people from CMR and Rancho Penasquitos (RP) will drive because there are no viable alternatives. Increased ADT will negatively impact LMA.

3) Queue times for I-15 were simulated by Sun Traffic 10 software and not physically measured. The LMA did not consider how a congested SR-56 might impact the entire I-15 interchange. Rancho Penasquitos and Carmel Valley residents entering SR-56 currently cause a backup for CMR residents onto Ted Williams Pkwy and Rancho Carmel Dr. thereby slowing access to I-15 on/off ramps. Eleven new Rancho Penasquitos and The Trails projects will exacerbate this condition. My commute time on SR-56 went from 25 to 45-60 minutes at peak times over the course of 5 years after addition of the Carmel Valley housing developments. This is only 10 miles! What will it be after RP and The Trails development?

4) I-15 is completely built out in this area and there is no publicly known funded or scheduled upgrade to SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical. SANDAG projects widening of SR-56 in 2040! "Funding for the six-lane improvements to SR-56 is not yet identified. The I-15 connector to SR-56 is also not funded" (p. 56).

5) The EIR review does cite the 11 ongoing and proposed developments in Rancho Penasquitos (Table 7, p. 43). The RP projects will add 19,942 daily trips to a region shared with CMR (8942 daily trips). Both subdivisions share shopping facilities (Costco, Home Depot, Marshalls etc...), yet the impact of the RP projects seems omitted from the EIR. Table 9 (p. 51) records only minor ADT changes to major roadways accessing the shopping regions. The LMA seems inaccurate based on a nearly 30,000 increase in ADT from the build-out of the RP and CMR projects.

6) Several major CMR roadways already operate at LOS E (Table 3). This level is considered by many agencies to be the limit of acceptable delay. The #22 Carmel Ridge/Ted Williams Pkwy interchange (p. 47) will be severely compromised in 2025 with project conditions, changing from E to F in the AM peak hour! Installation of a traffic light, as proposed, will generate a long queue that has potential to block Stoney Gate Pl. and Boulton Ave. This is an unacceptable impact on home owners (emissions, noise, traffic...). Though not discussed in the EIR, fire evacuation routes will also be impacted by The Trails project and changes to mobility in CMR.

I appreciate you taking the time to review my concerns on how The Trails development will negatively impact the quality of life for the CMR community.

Sincerely,
Dawn Nowlin; 20-yr CMR resident
11858 Wilmington Rd, SD 92128

198-1

198-2

198-3

198-4

198-5

198-6

198-7

Response to Comment Letter 198

98 Dawn Nowlin
February 3, 2021

198-1

The TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Refer to **Master Response 3**. Cumulative projects were included in the transportation/circulation analysis and cumulative transportation/circulation impacts were discussed in Chapter 6, Cumulative Effects, of the Draft EIR.

198-2

Refer to **Response to Comment 198-1**.

198-3

Regional transit service expansion and routes are determined by regional planning efforts through SANDAG and MTS. The Draft EIR's trip generation and vehicle miles traveled analysis does not take credit for new residents' transit use; therefore, the analysis does not rely on existing or expanded regional transit options. Refer to **Response to Comment 198-1**.

198-4

Refer to **Response to Comment 198-1**.

198-5

Refer to **Response to Comments 198-2** and **198-4** above. Regional improvements to the state highway system are determined through regional planning efforts conducted by SANDAG and Caltrans and are outside of the prevue purview of the project. The comment does not raise any issue concerning the adequacy of the Draft EIR.

I98-6 Refer to **Response to Comment I98-1** regarding cumulative traffic. Figure 8 in the LMA (Draft EIR Appendix C) shows the trip assignment for the cumulative projects considered in the Draft EIR. Information was based on individual traffic studies for those projects where available. Due to the variety of surrounding land uses and varying trip purposes throughout the day, cumulative project trips disperse throughout the roadway network, and not all trips generated by ongoing and proposed developments pass through the study area.

I98-7 Expected delay on Ted Williams Parkway resulting from the signal proposed as part of the project can be found in the intersection analysis results in Appendix D of the LMA (Draft EIR Appendix C). The analysis concluded that the addition of the signal does not result in delays that exceed the City's level of service targets that are required outside of the CEQA review process as required by the Local Mobility Analysis guidelines contained within the City's Transportation Study Manual.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Utility infrastructure impacts are discussed in Section 5.15, Public Utilities, of the Draft EIR. As discussed in this section of the Draft EIR, impacts to public utility systems were determined to be less than significant with mitigation incorporated.

Comment Letter I99

From: Donald Leake <dleake46@gmail.com>
Sent: Tuesday, February 2, 2021 4:43 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch Project Number 652519/SCH No. 2020039006

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The proposed project will swamp the existing infrastructure. The added vehicles will cause more greenhouse gases not to mention the added traffic congestion. This also adds the danger for evacuation in case of a wind driven fire. Also, the additional children will overcrowd the schools in the area.

The environment impact report states: "the proposed project would introduce a population beyond what is planned for the project site." The 1200 proposed homes is excessive resulting in crowding, and high Vehicle miles travelled causing increased gridlock, more air pollution, more greenhouse gasses and reduced quality of life for people living in Carmel Mountain Ranch.

The proposed housing is supposed to be similar to existing homes, mostly two story housing, in the community but it consists of 1200 apartment units and condos located in multi story buildings.

The CMR Community plan was designed to have all dwelling units follow the topography of the hillsides. The Trails propose to do massive amounts of grading to level hillsides to create large level pads. The plan calls for placing all buildings on one level. Large grading projects are rarely done in so close to existing houses. The dust created will pose a health risk to the current homeowners.

The Trails project is not compatible with the existing community character. The Trails wish to build 3-4 story multifamily buildings surrounded by existing 2 story single family homes. This goes against the San Diego urban design general plan.

Regards,
 Donald Leake, OD
 14548 Rutledge Sq
 San Diego, Ca. 92128

I99-1

I99-2

I99-3

I99-4

Response to Comment Letter I99

99 Donald Leake
 February 2, 2021

I99-1

Traffic was discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

Utility infrastructure impacts are discussed in Section 5.15, Public Utilities, of the Draft EIR. As discussed in this section of the Draft EIR, impacts to public utility systems were determined to be less than significant with mitigation incorporated.

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Also refer to **Master Response 8**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master**

Response 6. The comment addresses subject areas, which received analysis in the Draft EIR.

I99-2 Refer to **Response to Comment I99-1** for traffic and greenhouse gas information. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

I99-3 Refer to **Master Response 1** regarding General Plan and Community Plan consistency. Also refer to Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion pertaining to consistency with applicable land use plans and policies including the City's General Plan and the Community Plan.

With regard to landform alteration, this topic was discussed in Section 5.17, Visual Effects and Neighborhood Character and the analysis concluded the project would result in a less than significant impact. Refer to **Master Response 2**.

Regarding dust from grading, as discussed in Section 5.3, Air Quality and Odor, of the Draft EIR and **Master Response 7**, the project would result in less than significant air quality impacts, including from fugitive dust associated with construction activities. The comment addresses subject areas, which received analysis in the Draft EIR.

I99-4 Refer to **Master Responses 1** and **2**, as well as **Response to Comments O2-26** through **O2-28**.

Comment Letter I100

From: Fawn Chang <bambio@gmail.com>
Sent: Wednesday, February 3, 2021 2:17 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Carmel Mountain Ranch Golf Course Development - New Urban West

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Hi,

I reside at 13758 Lindamere Lane, I love our quiet neighborhood and wish it to stay that way. Because of the quiet neighborhood as one of the reasons we bought this house and have lived here since 2014. Having the Urban West units develop here would increase traffic and making it not quiet anymore. Everyone that comes to our house loves our neighborhood. We are against this plan to use on the Golf Course. Thanks.

Regards,
Fawn

I100-1

Response to Comment Letter I100
100 Fawn Chang
February 3, 2021

- I100-1** Traffic is discussed in Section 5.2, Transportation/Circulation of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- Regarding noise, impacts were analyzed in Section 5.11, Noise, of the Draft EIR. Impacts were determined to be less than significant with mitigation. Also refer to **Master Response 4**.

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Comment Letter I101

From: George Lerinsky <georgelerinsky@gmail.com>
Sent: Tuesday, February 2, 2021 3:17 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern,

Please find the below concerns and objection to the 1,200 proposed unit - The Trails at Carmel Mountain.

As I'm sure you have all already seen and read, the proposed construction does not fit in with the community plan, approved over 20 years ago. This project would add traffic, to an already densely populated area, with limited roads and freeway access. In addition, it would destroy almost all of the green space it surrounds. Please note that all proposed "park" and "walking trails" in the proposal are right next to the freeway, rendering it useless. This will not solve any of the housing issues, only YOU can. If you continue to pass new regulation and safety measures for any proposed building projects, all you are doing is inflating the construction costs, and thus adding to the affordable housing issue. This project is not the way to resolve this.

Regards,
 George Lerinsky

I101-1

Response to Comment Letter I101
101 George Lerinsky
February 2, 2021

I101-1

Refer to **Master Response 1** regarding density and consistency with the Community Plan. Traffic is discussed in Section 5.2, Transportation/Circulation of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic.

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Comment Letter I102

From: Girish Charpe <girishcharpe@gmail.com>
Sent: Tuesday, February 2, 2021 2:53 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Cc: Troy@WealthAnalytics.com <Troy@WealthAnalytics.com>; Bhavna Charpe <bhavna.charpe@gmail.com>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Hi,

My name is Girish Charpe, a resident of Carmel mountain ranch community.

My address is:
 13836 Lewiston Street, San Diego, CA 92128

This email is in reference to "The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006".

Below are the concerns I see with this project impacting the Carmel mountain community.

1

I102-1

Response to Comment Letter I102
102 Girish Charpe
February 2, 2021

I102-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. Refer to **Response to Comment 02-11a** regarding open space.

Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

- Destruction of Community Character
- Loss of Open Space and Park Land
- Increased Wildfire Rise
- Increased Evacuation Risk

Thank you for your time and appreciate your help in looking into this matter.

Thanks,
Girish

I102-1
Cont.

Comment Letter I103

From: Gordon Wagner <office@spaceways.net>
Sent: Wednesday, February 3, 2021 11:11 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Comments on environmental impact of Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Greetings:

My understanding of this proposed development is that it would pack the space once occupied by the now defunct golf course with a vast number of housing units with little regard for preserving open space in any way, shape or form and with equally little regard for the increased traffic in the area.

Not to be cynical, but one can hear the cha-ching cash register sounds in the background. "Developers" strike once again, and, as usual, for the worse.

I103-1

All the best,

Gordon Wagner
 Concerned Homeowner
 office@spaceways.net

the worse.

All the best,

Gordon Wagner
 Concerned Homeowner
 office@spaceways.net

↑I103-1
 Cont.

Response to Comment Letter I103

103 Gordon Wagner
 February 3, 2021

I103-1

Refer to **Master Response 1** regarding density. Traffic was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I104

From: Gurudeep Bhat <gurudeepbhat@gmail.com>
Sent: Tuesday, February 2, 2021 4:29 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

Dear City Council:

We strongly oppose the proposed Trails at Carmel Mountain Ranch Project (heretofore the Project) in its current form. The Project violates the many provisions of the California

I104-1

Response to Comment Letter I104
104 Gurdeep Bhat
February 2, 2021

I104-1 The City acknowledges the comment as an introduction to comments that follow and notes that the comment expresses general opposition to the project.

<p>Environmental Quality Act (CEQA). The Project destroys the community character of Carmel Mountain Ranch and presents a number of unmitigable environmental impacts.</p>	<p>I104-1 Cont.</p>	<p>I104-2 Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to Master Response 1, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and Master Response 2 regarding aesthetics impacts. Refer to Response to Comment 02-11a regarding open space.</p>
<p>Considerable environmental damage will result from this project. Additionally, the EIR is deficient in many respects. The Project will result in the destruction of community character, loss the open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigable environmental impacts.</p>		<p>I104-3 Refer to Response to Comment 02-11a regarding open space.</p>
<p>Destruction of Community Character</p> <p>Without a doubt the Project does great harm to the community character of Carmel Mountain Ranch. First, residents of Carmel Mountain Ranch purchased their homes under the assumption that open space and green space would be a prominent feature of their community. They had good reason to believe that green space would characterize the community since, the project site is designated Park, Open Space, and Recreation in the General Plan."</p>	<p>I104-2</p>	<p>I104-4 Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, of the Draft EIR, Final EIR Appendix D1, Evacuation Plan, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to Master Response 5.</p>
<p>Loss of Open Space and Park Land</p> <p>The EIR suggests the Project will expand designated park land. The greatest amount of open space would be provided by the "no project alternative" in the EIR.</p>	<p>I104-3</p>	
<p>Increased Wildfire Risk</p> <p>Building in very high fire severity zones is so dangerous that numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature.</p> <p>Building in very high fire severity zones is dangerous for three reasons:</p> <ol style="list-style-type: none"> 1. Additional residences increases the risk of human generated fire from normal human activities (vehicles, power equipment, barbecues, etc.). 2. Building in a high fire zone increases the impacts on people and property when a fire occurs. 3. Evacuation from a high fire severity zone is exacerbated by increased development (see the next section dealing with evacuation). 	<p>I104-4</p>	
<p>Increased Evacuation Risk</p> <p>Evacuation from Carmel Mountain Ranch in the event of a wildfire will be extremely difficult and the proposed 1200 homes and 3500+ residents exacerbate an already dangerous situation. Most wildfires come east during wind-driven Santa Ana conditions. Although large thoroughfares and freeways do exist in the area (Routes 15 and 56, Ted Williams Parkway and Pomerado road) these exits will be swamped by residents fleeing</p>		

<p>other large communities to the north and east including Poway, Rancho Bernardo, Ramona, Escondido and others.</p> <p>Everyday traffic can create jams and stoppages. The city of Poway conducted a study of the area just east of Carmel Mountain Ranch and concluded:</p>	<p>I104-4 Cont.</p>	<p>I104-5</p>	<p>Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR.</p>
<p>Creates more Sprawl Housing</p> <p>This Project is not really infill. Although located within the City of San Diego, Carmel Mountain Ranch is suburban development. Infill not appropriate for the suburban periphery of San Diego. The EIR states: "the proposed project would introduce a population beyond what is planned for the project site." The 1200 proposed homes is excessive resulting in reduced quality community character, crowding, high Vehicles miles travelled (VMT; see Climate Change section below). Sierra Club San Diego would support a project of approximately 200 hundred homes that are a mix of single family homes, multi family homes, and rentals.</p> <p>The EIR states: "The site is primarily characterized by developed land/disturbed habitat (comprised of graded and previously maintained areas of the golf course as well as ornamental plantings and landscaping associated with the golf course use) and some native habitat (upland and wetland species)." Open space should not be converted to suburban sprawl development within the city of San Diego or elsewhere. This is one of the largest sprawl developments in the past several decades in San Diego and should require great scrutiny.</p>	<p>I104-5</p>	<p>I104-5</p>	<p>The Draft EIR determined the project's impacts would be considered less than significant. Refer to Master Response 1, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and Master Response 2 regarding aesthetics impacts.</p> <p>Traffic was addressed in Section 5.2, Transportation/<u>Circulation</u>, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to Master Response 3. Refer to Response to Comment O2-11a regarding open space.</p>
<p>Massive Increase in Greenhouse Gas</p> <p>The huge amount of greenhouse gas (GHG) released from this project exceeds any GHG goals of the Climate Action Plans of the City of San Diego and State of California. The project will result in a massive increase in GHG even after some minor mitigations on the City of San Diego checklist are implemented. This project does not take us closer to the 1990 GHG levels, the goal of the City's Climate Action Plan; it would not even come close to maintaining GHG at 2021 GHG levels.</p>	<p>I104-6</p>	<p>I104-6</p>	<p>Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation. The comment addresses subject areas, which received analysis in the Draft EIR.</p>
<p>Reduced Air Quality</p> <p>GHG that promotes climate change will result from this project but so will polluted air. The project also represents a major increase in air pollution and related health effects.</p> <p>Unlike many construction projects the Project is surrounded by and immediately proximate to thousands of homes. A large construction project within an existing neighborhood would produce abundant air pollution and dust.</p> <p>Despite mitigation measures, fugitive dust from grading, hauling, conveying, and loading will occur. Fugitive dust is carcinogenic and is implicated in a host of respiratory problems</p>	<p>I104-6</p>	<p>I104-6</p>	<p>Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Impacts were determined to be less than significant. Refer to Master Response 8.</p> <p>Air quality impacts were analyzed in Section 5.3, Air Quality and Odor, of the Draft EIR and impacts were determined to be less than significant. Refer to Master Response 7.</p>

including COPD, asthma, emphysema, lung cancer and premature death. Dust pollution would blow westward with the prevailing winds and pollute several communities of San Diego and the City of Poway. During Santa Ana winds dust would blow into Rancho Penasquitos and number of other San Diego communities,

Transportation and Traffic

The Project produces a large increase in traffic in North County San Diego and the EIR concludes that transportation impacts are **unmitigatable**. This is despite the fact that “**Portions** of the Project site are located within a Transit Priority Area (TPA) due to proximity to the Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit Station approximately 0.5 miles south of the Project Site.” Traffic is often stopped on area roads and Freeways, and this compounds an already serious problem.

Conclusion

The project should not be allowed to make statements of overriding consideration. Instead it should mitigate these deficiencies that the EIR concludes are unmitigatable.

We believe that a substantially downsized project (by 75%) or the no project alternative should be approved. As noted above the EIR is deficient in many respects and needs to be rewritten and recirculated.

I104-6
Cont.

I104-7

I104-8

I104-7

Refer to **Master Response 3** regarding the transit priority area designation.

I104-8

A statement of overriding considerations has been prepared as part of the Final EIR and will be provided as part of the record. Refer to **Master Response 10** regarding alternatives.

Respectfully,

Gurudeep Bhat

12085 World Trade Dr, Unit 3

San Diego, CA 92128

Comment Letter I105

Response to Comment Letter I105

105 Hedy Kelley
February 2, 2021

I105-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts and private views. Refer to **Response to Comment O2-11a** regarding open space.

Traffic was addressed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

From: Hedy Kelley <hedyakelley@gmail.com>
Sent: Tuesday, February 2, 2021 3:29 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: troy@wealthanalytics.com <troy@wealthanalytics.com>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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I am an owner in Carmel Mountain Ranch. We purchased the home in 2003 for the open green spaces, and fairway and mountain views off our back patio and from the master bedroom. If this project is allowed we would lose that. This is unacceptable. The project does great harm to the community character of Carmel Mountain Ranch. Under CEQA a project must be consistent with community character.

Construction of 1200 condos, apartments, and town homes is totally inconsistent with the community character of Carmel Mountain Ranch. The Project destroys much of the green space and visual aesthetics that we current residents enjoy. The open space, natural features, and natural topography will be destroyed by grading the terrain and by shoehorning a dense development into former open space. Moreover, the vast majority of structures in Carmel Mountain Ranch are single family homes. The proposed project consists entirely of town homes and three and four story apartment buildings and condos. This cannot happen. Changing an entire community for short term revenue from building these structures in unconscionable.

My home is across from Highland Ranch Elementary. The traffic is already very dense. I cannot imagine it getting three to four times worse.

Do not let this monstrosity of a project kill our beautiful community.

Thank you for your consideration.

Hedy Kelley
858-204-5989
hedyakelley@gmail.com

I105-1

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Comment Letter I106

From: jschroeder390@gmail.com <jschroeder390@gmail.com>
 Sent: Wednesday, February 3, 2021 3:30 PM
 To: DSD EAS <DSDEAS@sanidiego.gov>
 Cc: jschroeder390@gmail.com <jschroeder390@gmail.com>
 Subject: [EXTERNAL] Trails at Carmel Mountain Ranch, Project No. 652519 / SCH No. 2020039006

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I have the following comment regarding the Draft Environmental Impact Report for Trails at Carmel Mountain Ranch.

SECTION OF EIR

Section 5.17.3 Visual Effects/Neighborhood Character, Impact Analysis

Page 5.17-18

ISSUE

For Issue #4, Significance of Impact, Alteration to Existing or Planned Character, the EIR states:

"The proposed project would not result in a significant impact related to substantial alteration to the existing or planned character of the area such as could occur with the construction of a subdivision in a previously undeveloped area. Therefore, impacts would be less than significant."

This conclusion is inaccurate. The impacts would clearly be significant and unmitigated.

SUPPORTING MATERIAL

According to Figure LU-2 (Land Use and Street System Map, dated September 10, 2020) of the city's General Plan, the proposed project's parcels are designated "Parks, Open Space, Recreation".

According to the Carmel Mountain Ranch Community Plan, Parks and Open Space Element, page 33, the following consideration contributes to the Parks and Open Space Element's objective: "Incorporation of the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole."

According to the Carmel Mountain Ranch Community Plan, Community Environment, Conservation, and Design Element, page 87, the following is an example of a transitional element that should be used in Carmel Mountain Ranch: "The golf course that will meander through Carmel Mountain Ranch will provide a visual recreational amenity for the community, as well as an attractive separation between the various residential neighborhoods (Figure 28). The separation, coupled with the use of an internal street system, restricted circulation (cul-de-sacs) and a neighborhood landscape theme, will provide defensible neighborhood units. Landscaping should be used between the edge of the golf course and residential parcels to frame views from the dwelling units, as well as to soften the view of units from the golf course."

The second paragraph of page 5.17-18 of the EIR states: "Lastly, as previously noted, aesthetic impacts of the proposed project, which is an infill residential project within a transit priority area, cannot be considered a significant impact under California Public Resources Code Section 21099." This statement is inaccurate because the entire project does not fall within the transit priority area. Only several legal parcels of the land proposed for the project, at the southwest end, fall within the transit priority area.

Response to Comment Letter I106

106 John Schroeder

February 3, 2021

I106-1

Aesthetic impacts were addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I106-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts. Refer to **Master Response 3** regarding the transit priority area designation. The comment addresses subject areas, which received analysis in the Draft EIR.

CONCLUSION AND REQUEST

Although the golf course business is no longer operating, the land is designated Parks, Open Space, Recreation in the city's General Plan. The Trails at Carmel Mountain Ranch project proposes building on this open space. It proposes development on 11 of 18 former golf course holes, with development consuming most of the land on these holes, with only 50-foot buffers between existing single-family properties and proposed 2 to 4-story multifamily buildings. The project as proposed erases the planned character of Carmel Mountain Ranch and conflicts with the Community Plan, removing the designed separation between neighborhoods. Please reassess the significance of impact, considering only several legal parcels at the southwest end of the proposed project fall within the transit priority area. The impacts would be significant and unmitigated.

Thank you.

John Schroeder

13779 Lindamere Lane, San Diego, CA 92128

I106-3

I106-3

Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR regarding General Plan and Community Plan consistency.

Comment Letter I107

From: Jac Guerrant <jacquerrant@gmail.com>
Sent: Tuesday, February 2, 2021 4:33 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Sirs and Madams,

In reference to The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

As an owner of property located on Tivoli Park Row and adjacent to what was Hole #1 of the golf course I am very concerned over the direction the development is going.

This development will:

1. Increase traffic to an already overloaded community and to Highway 56.
2. Over burden schools and social infrastructures that we not built or intended for this type of population increase.
3. Creates potential safety and fire hazards relating to exiting the area and evacuations.
4. Removes precious open space that the community was originally built under and intended for.

It is time the city stood up to developers and did what is right for the community that already exists. A massive development that does nothing but add the maximum amount of housing and population increase is not the answer. Please reject this product in favor of a more reasonable use of the land that includes some housing but more open space.

Regards,

Jonathan Guerrant
 11915 Tivoli Park Row #3, San Diego, CA 92128
 858-722-0083

I107-1

Response to Comment Letter I107

**107 Jonathan Guerrant
 February 2, 2021**

I107-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** for additional information.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. Refer to **Response to Comment O2-11a** regarding parks open space. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I108

From: Kathi Goodman <LGoodman@san.rr.com>
Sent: Tuesday, February 2, 2021 5:54 PM
To: DSD EAS <DSD EAS@san.rr.com>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center, 1222 1st Avenue,
MS 501, San Diego, CA 92101

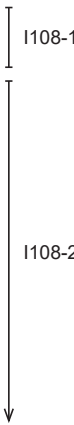
RE: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

Dear Ms. Shearer-Nguyen,

While there are several grave concerns regarding this proposed project, the overriding issues among our family and neighbors in Carmel Mountain Ranch pertain to the prevention of wildfires, and the ability to evacuate safely and in a timely manner in the event of an emergency.

WILDFIRES:

The EIR already recognizes that the proposed project is located in a High Risk for Fire zone. To state that the addition of 1200 units (along with the accompanying autos, people, and activity) does not have a significant impact on the risk for wildfire is unsubstantiated and disregards the increased potential for fire hazards in an already high risk zone. To rely upon the San Diego Brush Management Department as a mitigating factor is inadequate. I have had the need to work with the San Diego Brush Management Department on more than one occasion and found that the department is severely backlogged, taking weeks and sometimes months for a response. It is unreasonable to trust that the Brush Management Department is staffed with the necessary resources to keep up with maintaining the properties in the prescribed manner to mitigate fire risk. What is the governing body that overlooks this department and who is responsible for ensuring that the department is performing its duties according to the prescribed guidelines? There is a way to mitigate these increased risks of wildfire in a zone that is already confirmed to be high risk and that is by choosing to adopt the "NO PROJECT" alternative.



Response to Comment Letter I108
108 Kathleen Goodman
February 2, 2021

I108-1 The City acknowledges the comment as an introduction to comments that follow.

I108-2 Wildfire hazards and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The proposed project would provide adequate emergency access to the project site and would comply with applicable state and City standards associated with fire hazards and prevention. An Evacuation Plan was prepared for the proposed project. The project would not impair or physically interfere with an adopted emergency response or evacuation plan.

Additionally, the long-term maintenance and preservation of open space resources on the project site including the trail system would be the responsibility of a new Master HOA. The HOA would also be required to contract with qualified professionals for the long-term care and maintenance of the bioretention basins and brush management zones. The HOA would also be responsible for enforcement of the project's Covenants, Conditions, and Restrictions. Any potential changes in use would be subject to future environmental review and the discretionary process. The comment addresses subject areas, which received analysis in the Draft EIR.

EMERGENCY EVACUATION:

With regard to being able to safely evacuate the area in the event of wildfires and other emergencies, it is recommended that an updated Evacuation Study be performed which will take into account the recent (2019 to present) construction of several residential projects in Rancho Penasquitos (located directly across Interstate 15 from the proposed project). This significant increase in population vies for access to the same evacuation routes (primarily Interstate 15 and Highway 56) as do the residents of Carmel Mountain Ranch. With no new or expanded evacuation routes to accommodate the increase in residents and autos, it is unreasonable to expect that an evacuation could be safe and timely. The personal and life-threatening evacuation experiences that occurred during the Cedar and Witch fires in the early 2000's are still being shared to this day by Carmel Mountain Ranch residents who endured waits of up to 2 hours just to gain access to Interstate 15. Once the interstate is accessed it is clogged for several miles in each direction as more cars feed into it with the same goal of escape. Is the City of San Diego willing to risk the lives of its citizens during these emergencies? There is a way to mitigate these severe safety risks during an evacuation by choosing to adopt the "NO PROJECT" alternative.

The matters discussed above are highly significant but they are by no means the only facets of this proposed project that are of grave concern to the residents of Carmel Mountain Ranch. I strongly encourage that all expressed concerns be given significant consideration as this proposed project is evaluated, and that the resulting SMART decision will be what is best for the safety and well-being of San Diego citizens.

Sincerely,

Kathleen Goodman
13811 Royal Melbourne Square
San Diego, CA 92128

I108-2
Cont.

Comment Letter I109

From: Larry Goodman <biglar9999@yahoo.com>
Sent: Monday, February 1, 2021 9:50 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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E. Shearer-Nguyen, Environmental Planner, 2/1/21
City of San Diego Development Services Center, 1222 1st Avenue,
MS 501, San Diego, CA 92101

Dear Ms. Shearer-Nguyen

I'm opposed to the Trails Project, because the current EIR doesn't address correctly the Key issues of dealing with Carmel Mountain Ranches Community Plan. On July 12,

1

I109-1

Response to Comment Letter I109
109 Larry Goodman
February 1, 2021

I109-1 Refer to **Response to Comment 02-11a** regarding open space. Additionally, most of the parcels within the project site are zoned as Agricultural-Residential (AR-1-1).

1984 the community plan was adopted and the golf course was zoned AR-1 to protect the open space running through the entire home community. If the EIR approves a 1,2000 unit project to be built on the former golf course, there will be a major reduction of open space and protecting open space is a critical element of San Diego's General plan. The Trails project is proposing to build on 11 of the 18, which will create vertically no open space on those holes. The EIR states that the Trails will expand designated park land, when in fact the project will reduce open space by 52 acres.

Another major concern is that Carmel Mountain Ranch is built on one of San Diego's severe fire areas. Adding 1,200 units, 3,000 people and more than 5,000 cars will increase the risk of safe & quick evacuations during a major fire. The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. I The nearby Witch fire in 2007 burned over 200,000 acres in North County including the nearby communities of Ramona, Rancho Bernardo, Poway, and Escondido and burned for over 2 weeks. It destroyed over 1,000 residences including 365 in Rancho Bernardo just north of the Project and 90 homes in Poway, just east of the Project. I can recall my friends in CMR telling me that it took over one hour to get out of CMR during Witch fire in 2007.

I live at the top of the 6th hole on the golf course (6 unit).The Grading Plans that NUW is presenting Are Not Consistent with Community Plan and Trails Design Guidelines Grading, land locked, health hazard, not consistent with community plan. Building homes on this slopping narrow piece of property will require that the builder bring in large earthmovers and graders to level out the entire hole, removing thousands of cubic yards of dirt and debris. Doing this will have a major effect on greenhouse gas and will reduce the air quality. The EIR states: "Development of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings The heavy construction, constant noise, air pollution of diesel tractors & clouds of dust will have a significant effect of the quality of life for the current home owners who live on both sides of the proposed development To solve the problems associated with grading , the project should not allow leveling of hillsides. Each building should follow the CMR Community plan by having each new building to be constructed on its own level pad

The majority of the homes in Carmel Mountain Ranch are 2 story. The Trails Project are planning on building 4 story, 43 feet tall apartments & condos .In the current CMR Community plan 75% of all units are single family homes & 25% apartments. New Urban West is totally changing our approved Community Master approved in 1984 to build 75% apartment & 25% condos for sale, having no single family homes in their plans. If New Urban West is allowed to do this, it will wipe out our open space of 11 holes, block the air space of existing homes from the sun and create changes in wind direction and effect climate change. To date NUW has only supplied our community

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Cont.

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I109-2

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I109-3

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts.

Air quality is discussed in Section 5.3, Air Quality; greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

with sketches of the proposed 1,200 unit development. NUW is unwilling to show the community finished photos of their proposed building and how they sit on the course. I'm attached the original sketches of NUW Trails project for you to see for yourself this 1,200 unit project doesn't meet the existing 37 year old master plan for Carmel Mountain Ranch and approving it will change the community character permanently.

I respectfully urge the EIR to reconsider its decision and vote NO on NUW Trails Project.

Lawrence Goodman

13811 Royal Melbourne Square, 92128

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I109-4
Cont.

I109-4

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion regarding General Plan and Community Plan consistency and **Master Response 2** regarding aesthetics impacts and private views. Refer to **Response to Comment O2-11a** regarding open space.

Finally, alteration to air movement was discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Impacts related to substantial alterations of air movement were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I110

From: lsuycott@san.rr.com <lsuycott@san.rr.com>
 Sent: Tuesday, February 2, 2021 12:07 PM
 To: DSD EAS <DSDEAS@san.rr.com>
 Subject: [EXTERNAL] Project Number 652519/SCH No. 2020039006 Trails at Carmel Mountain Ranch - Golf Course Development

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Project Number 652519/SCH No. 2020039006
 E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center

Concerns

- **TRAFFIC** - The development plan in the vesting drawings cover sheet bullet points shows 2,400 New Units (1,200 multi-family and 1,200 condominium) yet the Traffic Impact Report only covers 1,200 units so the figures are already 50% less than what they should be without many other considerations including the increased traffic in an already compact and crowded area. A few of the concerns are:
 - A. Two cars per unit is grossly underestimated. You only need to drive through Walden or other Developments in our area and see that many of the houses have at least 3-4 cars parked in their driveways and/or on the street despite having 2-3 car garages. Many of our neighbors have at least two teens or young adults still living at

I110-1
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Response to Comment Letter I110

110 Lisa Suycott

February 2, 2021

I110-1

To clarify, the project proposes 1,200 total multi-family dwelling units, not 2,400 units.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic, congestion, and parking. With regard to the commenter's question about traffic along I-15, the City's TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Nevertheless, all roadways mentioned by the commenter, including Ted Williams Parkway, Carmel Mountain Road, and Highland Ranch Road, were included in the study area analyzed in the LMA prepared for the proposed project (Appendix C of the Draft EIR).

<p>home, extended family members including elderly parents residing with them and others who are renting out rooms. Your 'assumption' that each unit would only have two cars is far from realistic.</p> <p>B. Parking – Two cars per unit is a <u>gross understatement</u>. Many units will have more than two drivers so, unless there are plans for a parking garage of some sort, where will these extra vehicles be allowed to park? What happens when people living in these units have guests?</p> <p>C. On Highland Ranch Road, you have a driveway coming out of the units that will require a right hand turn onto Highland Ranch then a U-turn at the light (Eastbourne Road) 1/4 block north of it in order for them be able to go south to get to Ted Williams. When Highland Ranch Elementary is open, existing traffic at that light is nothing less than a nightmare when parents are trying to get to the school in the morning and afternoon. This will only be exasperated with many more drivers needing to use Highland Ranch Road as a means just to get out of their own development.</p> <p>D. Carmel Mountain Road is highly used and the shopping area parking lots are overcrowded even on weekdays. The Gas station at Costco often backups up out onto Carmel Mountain Road. With no visible means to widen the roads, what traffic impact analysis has been done on the additional overcrowding that will happen in this area when these 2,400 units are built?</p> <p>E. Metro Transit Station, I15 South and Ted Williams – Even though the station is at Ted Williams and I15, the majority of the new units are not within reasonable walking distance to the Station nor is it likely that most of the occupants be working downtown and therefore will probably not be using mass transit anyway. Traffic trying to get onto I15 South during rush hour currently backs up as far back as beginning of the curved entrance ramp onto the freeway. Traffic also backs up while traveling westbound on Ted Williams out to the coast in the morning and then eastbound in the afternoon. What traffic analysis has been done to account for the additional cars from the 2,400 units that will either be trying to enter onto I15 South in the morning or traveling both eastbound and westbound during rush hour on Ted Williams?</p>	<p>I110-1 Cont.</p>
<ul style="list-style-type: none"> • INFRASTRUCTURES AND SCHOOLS <p>A. What impact will all these new units have on the schools nearby? Will the Shoal Creek and Highland Ranch Elementary, Middle Creek Middle School and Rancho Bernardo High School be able to handle hundreds more students that 2400 new units will bring to the area? If not, where will these students attend school?</p> <p>B. What new infrastructures will have to be put into place and who will pay for that? Existing homeowners have already had 23 years of Mello Roos which we completed just a few years ago. Will existing homeowners be expected to pick up the tab for another 20 plus years of Mello Roos or will that cost be placed upon the owners of the new units which will require the new infrastructure?</p> <p>C. With 2400 new units, how is the city planning to supply additional water, sewage, electric and gas and other services to cover all of these additional units as well as the existing structures?</p> 	<p>I110-2</p>
<ul style="list-style-type: none"> • HOA (Not sure if this is per the city or the Carmel Mountain Ranch Development) <p>A. Will the new units have to abide by the existing HOA rules in the Carmel Mountain Development? Some rules include not being allowed to park RVs, campers, trailers, and boats more than 48 hours in a driveway or on the street; having to get approval to make changes to outside of their property or no more than 40% hardscape in the front yard, trees limited to a certain height and many more.</p> <p>B. Will our HOAs be increased because of these new units?</p> 	<p>I110-3</p>

Lisa Suycott
13611 Essence Road
San Diego, CA 92128

I110-2

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Utilities and utility infrastructure, including water, wastewater/sewer, electric, and gas infrastructure, are discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to public utilities and utility infrastructure were determined to be less than significant with mitigation incorporated.

I110-3

To clarify, the project would include its own, independent Master HOA separate from any existing HOAs. Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Establishment of an independent Master HOA is not a physical change to the environment.

Comment Letter I111

From: magkameron@aol.com <magkameron@aol.com>
Sent: Tuesday, February 2, 2021 3:00 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name : The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center,
1222 1st Avenue, MS 501, San Diego, CA 92101

My name is Margaret Cameron, a resident/homeowner in Carmel Mountain Ranch (CMR) since 1994. I live at 12217 Eastbourne Rd, San Diego, CA 92128 (Parcel 313-561-22-00) on what is currently Unit 16 of the proposed project. I believe it is very important to give you a brief background of my experience in CMR as a good neighbor, desire to stay and the efforts I've put forth to maintain a family home here as a productive, appreciative resident of this beautiful community environment in San Diego. I have NO marketing nor real estate expertise.

As a single parent, I have worked full time for the USPS in CMR as a RN, part time as an adjunct professor for the University of Phoenix, and a Colonel in the US ARMY as a Reservist (other than my

Response to Comment Letter I111
111 Margaret Cameron
February 2, 2021

I111-1 Comment noted.

I111-1

5 years of active duty) to support living in my home. I bought into a Master Planned Community because of the Community Plan established over 30 years ago, the AR-1 zoning, the community character, green space, excellent schools, access to retail, etc. The homes are purposely close to each other, and have small back yards to enjoy open space in the AR-1 zoned areas.

Many of the current residents are original owners or have lived in CMR 20+ years. There is tremendous noise now and the structures are not built to tolerate more. (You can hear water running, HVAC, family conversations from your neighbors home day and night.)

The current golf course owner bought into the established community with the same guidelines, AR 1 zoning, and expectations to be a good neighbor as a business owner of a golf course that borders 700 homes and impacts the entire community of 5000 homes.

We tolerated the changes to the Golf Course, the over grown landscaping into our small backyards, have endured the green grass view changed to desert landscaping (after the current golf course owner accepted governmental monies to do that ~ 10 years ago to sustain viability), and now since spring of 2018 have watched the previous golf course area deteriorate into an overgrown, bleak fire hazard, and eyesore. We'll also seen the increased transportation challenges, overcrowding, crime, traffic, noise, evacuation problems, fire danger, air quality issues increase and a lack of privacy throughout. Our quality of life has diminished greatly. There are also other projects in close proximity that will exacerbate all of these concerns: Millennium PQ Project and Pacific Villages.

When the current owners closed the CMR golf course without warning, our CMR HOA asked for volunteers from the community to explore the potential impacts from the closure and be a resource to the Community. I have served on the CMR Golf Course Committee (GCC) since it was established. I have participated monthly, attended Community Council meetings, reviewed the Draft EIR as well as the following which you've already received copies: Carmel Mountain Ranch/Sabre Springs Community Council, CMRSS Golf Course Committee, Carmel Mountain Ranch Residential Community Association (Our HOA), The Sierra Club, CMR United, and support all of the concerns that have been expressed for our community. I have attended and been apprised of all of NUW's presentations and marketing materials. NUW has NOT provided specific information of impact, has omitted controversial analysis, substantial accommodations nor has acted with goodwill for the community. I have acted without bias. With respect to Unit 16's proposed development, all homeowners have 2 story homes, have a shortened back yard, view fence and privacy as part of their purchase. With this development we will lose all privacy, sunlight, views of the mountains, have increased electric noise, parking lot in sight, increased traffic, cars, trash containers, bikes, as a 4 story apartment is proposed within a few feet of our homes. Without repetition of all the salient points, I concur with: <https://img1.wsimg.com/blobby/go/9315728c-4d8f-40f3-9ad6-2b9a416c048f/downloads/The%20Trails%20at%20CMR%20EIR%20Issues%2001-27-21.pdf?ver=1611775186287> and that this development, as is, will destroy our neighborhoods, we'll lose what little open space there is, it will create additional traffic, parking problems, congestion, increase evacuation risk, massively increase green house gas and environmental damage, reduce air quality, eliminate privacy from our backyards, and develop other transient issues.

The Draft EIR states that this project produces 'significant and unavoidable impacts' to the established community. This plan is unacceptable as is, too much, too close, too high. The City of San Diego and Planning Commission will make the final determination. I plead with you to acknowledge the travesty that a few's financial interest are more important the 5000 established citizens that moved here because of the current plan.

If there is any clarification or information that's required, please let me know. Thanks in advance for your thoughtful review!

Very respectfully,
Margaret Cameron
858-254-1429

2

I111-1
Cont.

I111-2

I111-3

I111-4

I111-2

Comment noted.

I111-3

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Master Response 2** regarding aesthetics impacts and private views. Refer to **Response to Comment 02-11a** regarding open space.

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic, congestion, and parking.

Evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

- I111-4** Regarding the significant and unavoidable impacts of the project, the City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project.

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Comment Letter I112

From: Maria Gulati <mygitana@gmail.com>
Sent: Tuesday, February 2, 2021 2:46 PM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hi,
 I am a homeowner and have been enjoying how peaceful our area is.
 A project like the one is proposed will harm us long time residents in many ways:

- The Project will result in the destruction of community character, loss of open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases in greenhouse gas exacerbating climate change, reduced air quality, and more.
- blatantly violates Senate bill 375 requires that California preserve open space and not build large housing projects on open space and park land.
- Building in very high fire severity zones is so dangerous that numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature. The City has no recent experience with large sprawl developments, certainly none since the fires of 2003 and 2007. The prolonged draught and deadly fires should give the City great pause in approving such a project.
- Greenhouse Gas Emissions, will be excessive due to the project exceeding Vehicle Miles Traveled guidelines established by the State of California. The City of San Diego has adopted its own climate action plan. Leaders will need to violate both City and State guidelines to initiate the Trails at CMR development. Global warming is a scientific fact. Nations are around the world now realize the we must make significant changes to prevent catastrophe. Continue to build in area that are car dependent is no longer an option. The new development, must change and become environmental responsible.

Maria Gulati
 Mortgage loan officer
 NMLS ID: 1240563
 Empire Capital Group
 858-722-5159

<https://mariagulati.zipforhome.com/>
<https://www.yelp.com/biz/maria-gulati-empire-reality-associates-murrieta>

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Response to Comment Letter I112

112 Maria Gulati
 February 2, 2021

I112-1

The City acknowledges the comment as an introduction to comments that follow.

I112-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding community character. Refer to **Response to Comment O2-11a** regarding open space.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Refer to **Master Response 9** regarding sprawl housing.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant.

Refer to **Master Response 7** and **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

I112-3 Refer to **Response to Comment 01-11** regarding SB 375 consistency.

I112-4 Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I112-5 Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8** for information on greenhouse gas emissions.

The vehicle miles traveled metric is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I113

From: Marina <tivolipark12@gmail.com>
Sent: Tuesday, February 2, 2021 7:45 AM
To: DSD EAS <DSDEAS@sanidiego.gov>; troy@wealthanalytics.com <troy@wealthanalytics.com>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Dear Ms. Shearer-Nguyen and City Council,
I wanted to add my voice to those who oppose the above project. I completely agree with the points made by Sierra Club in their letter dated January 23, 2021.
The Project undermines interests of working Carmel Mountain Ranch residents who spent their life saving purchasing homes. The community is dense as it is, and adding more housing will make our commute to work much harder.

Please, take in consideration our concerns and interests.

Respectfully,

Marina Vavilov
12037 Tivoli Park Row 6
San Diego, CA 92128

Response to Comment Letter I113
113 Marina Vavilov
February 2, 2021

I113-1 Comment noted.

I113-1

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Comment Letter I114

From: Mark Shoukry <marks@twaenggroup.com>
Sent: Tuesday, February 2, 2021 2:48 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Troy@WealthAnalytics.com <Troy@WealthAnalytics.com>
Subject: [EXTERNAL] RE: Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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Dear Sir or Madam,

As a resident in Carmel Mountain Ranch area, I object changing the Golf Course next to my residence to be a residential area. The proposed project shall have negative effect on all the residence area and shall cause massive environmental damages. As a matter of fact the proposed project shall affect in a bad way all life aspects in the area. As an example, Traffic plans for the area are not designed to absorbed the increased number of cars as a result of the new residential area.

The new residential area shall also reduce the fire safety for all the area and definitely the school system we have already in place cannot handle the new added number of students which shall result from the new added residential units. In addition, infrastructure already in place shall be affected in a negative way as it is not designed to handle the added residential project.

I strongly object this project and I ask to stop it ASAP. If you have any questions, please contact me.

Thanks

Mark Shoukry, Ph.D., PE, LEED AP, M ASCE
Tel.: (858) 304-2090
Cell: (310) 634-9538
Fax: (858) 923-2223
Address: 14175 Stoney Gate Place, San Diego, CA 92128

I114-1

Response to Comment Letter I114
114 Mark Shoukry
February 2, 2021

The environmental impacts of the project have been addressed in the Draft EIR in accordance with CEQA. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Wildfire hazards are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

I114-1

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Comment Letter I115

From: Rex Harris <rxford99@outlook.com>
Sent: Wednesday, February 3, 2021 7:44 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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1200 new units? Does that mean 4 persons on average per unit, 4,800 new people in the community?

What is the short term and long term impact on the infrastructure: schools, shopping, traffic?

Isn't that like 30% more people in the community?

Best Regards,
Rex Harris
Residing in Walden.

Sent from [Mail](#) for Windows 10

1

I115-1

Response to Comment Letter I115
115 Rex Harris
February 3, 2021

I115-1

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Traffic is discussed in Sections 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Shopping is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I116

From: Rick Ludwig <wigs57@aol.com>
Sent: Tuesday, February 2, 2021 11:15 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Rick Ludwig <wigs57@aol.com>
Subject: [EXTERNAL] THE TRAILS AT CARMEL MOUNTAIN RANCH, PROJECT NUMBER 652519/SCH NO. 2020039006 ENVIRONMENTAL IMPACT REPORT (EIR) RESPONSE

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City Council,

I moved Carmel Mountain Ranch (CMR) in 2003. I was extremely fortunate to purchase a lovely single family home on the CMR Golf Course along the 17th Fairway. I was delighted to

1

I116-1

Response to Comment Letter I116
116 Rick Ludwig
February 3, 2021

I116-1 The City acknowledges the comment as an introduction to comments that follow.

have an unobstructed view of open spaces that included natural habitat and wildlife just up the hill in my own backyard. Additionally, I was delighted when the end of Eastbourne was turned into a cul-de-sac. That meant much reduced traffic density and increased safety. Additionally, all the retail establishments I could even need were within close range. The only negative was and is the traffic congestion problem in the Ralph's Shopping Center parking lot. I believed this would be a long term residence in which I would like to remain in particularly in light of the fine CMR Community Plan.

About two years ago, I learned about the Golf Course closure and that a New Urban West developer from Los Angeles was proposing housing on the golf course. I got an initial impression that the project would be about 150 single family dwellings spread throughout the golf course with the goal of maintaining the CMR Community Integrity. When I learned that the New Urban West proposed project was 1200 units including multilevel Townhomes and Apartments, I was shocked. Before I respond to the EIR, I would like to address two areas that specifically impact not only me but all the Eastbourne Road residents on the 17th Fairway.

First is Unit 17 that is planned for Fairway 17. As is, we can easily see the two story Townhomes on the other side of the Fairway but they blend into the natural landscape. But now in-between will be a unit that is 3 to 4 stories high holding about 300 residents. The driveway will be along our back property line, as will be the parking. The serenity of sitting in my backyard will now be removed by the addition of this very large, high density unit. Noise will increase, security/privacy will decrease and open spaces will be gone forever!

Second is the traffic pattern for Unit 17. The plans show that the entrance/exit point for this unit will be in our cul-de-sac. Traffic density will dramatically increase with safety dropping significantly. We have many children and residents that use that end of Eastbourne and the cul-de-sac for recreation such as walking, bicycling, basketball, skateboarding, baseball and more. Their safety is in jeopardy! The road is narrow particularly with cars parked along both curbs. Related is the increased traffic we get when the Middle School on the north side of Highland Ranch Road along Eastbourne begins and ends classes. Large numbers of parents turn up our end of Eastbourne to perform a U-Turn to more easily get to the Middle School. This will be a significant traffic and safety issue. A resolution would be to have the Unit 17 road go directly to Carmel Ridge Road which can better handle the increased traffic.

I will now list my concerns with the EIR for Project 652519:

- **Executive Summary**
 - **Project Objective 1, Section ES.3 is not met** - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

I116-1
Cont.

I116-2

I116-3

I116-4

I116-2 Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be a less than significant with mitigation incorporated. Refer to **Master Response 4**. Refer to **Response to Comment 02-11a** regarding open space.

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment 02-13a** regarding buffer uses. Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

I116-3 Traffic and transportation safety are discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I116-4 To the extent the comment involves community character concerns, community character is addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.

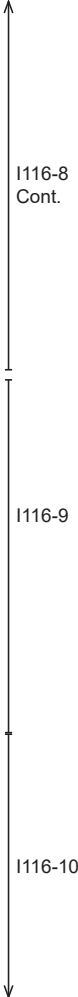
<ul style="list-style-type: none"> ▪ The majority of CMR are 1 and 2-story single family residential that are at the high elevations and in the central areas. Existing CMR multi-family housing units and apartments were purposely placed at lower elevations and closer to the larger capacity roads including bus stops. ▪ There is no accurate design plan detailing the exact building, road and parking locations. This makes any analysis done thus far inaccurate. ▪ The developer was asked many times to provide a plan with similar housing as now exists in CMR. They presented a plan instead of 1200 units that are 3-4 story units. ▪ NUW was requested to preserve the views of the existing residents as designed under the original Community Plan. That obviously has not been taken into consideration. 	I116-4 Cont.
<ul style="list-style-type: none"> ○ Project Objective 1, Section ES.3 is not met – the range of housing types are not compatible with the adjacent CMR residential communities. <ul style="list-style-type: none"> ▪ The project is all high density multi-unit buildings while CMR is less than 50%. CMR has about 50% single family homes. This project has none. ▪ The project places large multi-unit buildings 37' and 48' tall as close as 50' from 1 and 2 story single family homes. Depending on lot elevations, height differences could be even greater. 	I116-5
<ul style="list-style-type: none"> ○ Project Objective 2, Section ES.3 is not met – Assist the City of San Diego (SAN) in meeting state and local goals by providing opportunities for high-quality, new, market-rate and deed-restricted housing to meet the needs of current and future SAN residents on vacant land centrally located near existing jobs, transit, commercial and industrial development. <ul style="list-style-type: none"> ▪ 85-90% of the proposed project is on very hilly sites that are over 250' in height and over 1.5 miles to the Sabre Springs Transit Center. This is not suitable for seniors and it does not comply with ADA and TPA guidelines. 	I116-6
<ul style="list-style-type: none"> ○ Project Objective 3, Section ES.3 is not met – Preserve the majority of the project site as open space, avoid areas of native vegetation or potentially suitable habitat for special-status plants species, and areas of sensitive habitat including jurisdictional areas and their associated 100-foot buffers. <ul style="list-style-type: none"> ▪ The project proposal needs to utilize the same 100-foot buffers for all edges that are adjacent to existing sensitive golf course homes. These buffers are required of the health, safety security, noise and privacy issues for all golf course homes particularly when there are 100% publicly accessed trails. 	I116-7
<ul style="list-style-type: none"> ○ Project Objective 4, section ES.3 is not met – The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought-tolerant, native landscaping. 	I116-8

I116-5 Refer to **Response to Comment I116-4**. In regard to housing types, a variety of building types (townhomes, garden walk-ups, stacked flats and apartments, among others) would be provided in the community, with a mix of for-sale and rental product to serve a diverse and mixed population and household size. A variety of architectural styles would be allowed across the neighborhoods, so long as a consistency is established at each planning unit neighborhood to help define a sense of place. Therefore, the project would provide a variety of housing types, and therefore meets project Objective 1.

I116-6 Pursuant to San Diego Municipal Code Section 143.1103(a)(2), the entire project site is considered to be within a transit priority area. Refer to **Master Response 3** for a discussion pertaining to ADA accessibility.

I116-7 Refer to **Response to Comments I116-2**. In addition, to the extent the comment raises a concern with regard to biological resources, that impact area was addressed in in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated.

I116-8 Comment noted.

<ul style="list-style-type: none"> ▪ The current blighted status of the golf course is solely due to the current ownership. The course was re-landscaped only a few years ago with native plants and trees but the <i>temporary</i> irrigation was turned off! ○ Project Objective 4, Section ES.3 is not met - The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought-tolerant, native landscaping. <ul style="list-style-type: none"> ▪ The current sad condition of the golf course was solely due to the neglect of the current owner. He closed the golf course in 2018 and stopped maintenance on the property. The current condition of the course could be reversed without creating an infill project by: <ul style="list-style-type: none"> • Increase mowing and brush maintenance. • Use the property of agricultural purposes such as keeping the clubhouse open and converting the fairways to vineyards. An example is Monserate Winery in Fallbrook. • Sell the property under the AR 1-1 zoning. ○ Project Objective 5, section ES.3 is not met – Create a wide-range of active and passive public recreational opportunities above and beyond what is required by SAN regulations. <ul style="list-style-type: none"> ▪ The project is really creating a reduction in Parks and Open Space as NUW is proposing to develop over half of the 164 acre golf course (11 of the 18 fairways) with high density 3 – 4 story Townhomes/Apartments. The Golf Course is considered as Parks and Recreational Open Space by the SAN’s General Plan. The project leaves much land unused. One of their planned parks is left for SAN to develop and this park in not very accessible by the handicap, emergency or maintenance vehicles. ▪ The project design guidelines suggest amenities may occur but do not provide any specifics for locations. ▪ The CMR Community has requested more Park and Recreational areas not less. Areas such as community playfields, playgrounds, passive park space, frisbee golf or a skatepark. ○ Project Objective 6, section ES.3 is not met – Establish a multi-use trail system for pedestrians and bicyclists with connections to major amenities and adjacent neighborhoods. Establish a public system of trails and paths for community-wide use, thereby providing enhanced neighborhood connectivity. <ul style="list-style-type: none"> ▪ The Trails project should set the bar high for a trail-way development and accommodate many types of users such as walkers, hikers, joggers, runners, bird watchers, dog walkers, bicyclists and the handicapped. ▪ The width of the proposed Trails is too narrow and not ADA compliant. Multi-use trails need to be at a minimum 12-14 feet wide to accommodate two-way traffic and be a minimum of 50 feet from existing homeowner fencing. 	 <p>I116-8 Cont.</p> <p>I116-9</p> <p>I116-10</p>
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I116-9 Refer to **Response to Comment 02-11a** regarding open space.

I116-10 Refer to **Master Response 3** regarding trails and for a discussion pertaining to ADA accessibility.

<ul style="list-style-type: none"> ▪ A multi-use trail system, in addition to width, needs to plan appropriate surface composition to eliminate the significant erosion during the rainy season, adequate vertical clearance and the proposed trail amenities. Note: the elevation change in CMR is over 270'. ▪ Amenities along the trails have not been specifically guaranteed for public use. Does that mean residents only? The proposed Community Garden is only accessible on foot via a steep trail from Unit 9 to Unit 17. 	I116-10 Cont.
<ul style="list-style-type: none"> ○ Project Objective 7, section ES.3 is not met – Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure that the project is cohesive and respectful of existing properties. <ul style="list-style-type: none"> ▪ The proposed project housing types are not compatible with existing CMR Community Plan. 1 and 2 story single family homes are required at the upper elevations and core levels of the existing CMR development to create compatible and appropriate densities/architecture. 3-4 story apartments/townhomes should be located as outlined in the CMR Community Plan to include 75-100' landscape buffers from existing housing. ▪ Buffer zones need to be 75-100' so the first 50' can be only landscaping and then a 12-14' wide community trail can be placed. No vehicular roadways or parking should be allowed within the first 50' buffer to provide for the existing homeowner's safety, security, noise and privacy issues. ▪ Imagery/drawings/sections received thus far are not reflective of actual construction details. ▪ Actual to-scale imagery/drawing/sections are required in the guidelines so they can be reviewed accurately. ○ Project Objective 7, section ES.3 is not met – The Trails at Carmel Mountain is not cohesive nor respectful of existing properties. <ul style="list-style-type: none"> ▪ The project is not cohesive as it infills the golf course fairways with housing that is significantly higher density and architectural style that it stands out instead of blending into the existing community. ▪ The project is not respectful of the existing properties/community as it is 100% multi-unit 3-4 story buildings with setbacks of only 50'. There is only a minimum of 15' landscaping buffer with project driveways and parking areas allowed as close as 30' from existing homes. See page 9 of the Design Guidelines for density and heights of proposed buildings, and page 14 for transitions, buffers, edges and screening for buffers and circulation elements. 	I116-11
<ul style="list-style-type: none"> ○ Section ES.8, Project Alternatives – This document is an informational document intended for SAN decision-maker and members of the general public use in evaluating the potential environmental impacts of this proposed project. This is a 	I116-12

I116-11 Refer to **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR for further discussion pertaining to consistency with applicable land use plans and policies. Refer to **Response to Comment I116-2** and **I116-4** regarding community character, bulk, scale, safety, security, noise, privacy, and design guidelines.

I116-12 Refer to **Master Response 2** and **Response to Comment I116-4** regarding community character. Refer to **Master Response 10** regarding alternatives.

<p>very controversial development proposal that will disrupt the lives of a well-established community of over 15,000 residents/businesses by <i>ONE Owner</i> if approved. They are attempting to profit by trying to rezone the existing property that will allow an outrageous change in the population which will change the culture and value of the existing community <i>forever!</i> It is confusing that the selection of alternatives chosen in this EIR is governed by a so-called “rule of reason” (required to evaluate only those alternatives necessary to permit a reasoned choice). It would seem more logical that one of the alternatives should be sought that mitigates the impacts and reaches out to blend better with the CMR Community Plan and existing development. This is especially true since the focus of this analysis is to determine 3 items (1) whether the alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of the alternatives, and (3) whether the alternatives meet all or most of the basic project objectives.</p>	<p>I116-12 Cont.</p>
<p>o Section ES.8.2, Reduced Density Alternative - This alternative would have the same footprint of the proposed project, but the density would be reduced. This would reduce the number of multi-family homes proposed from 1,200 to 825 (353 4-story apartments, and 472 3-story for-sale townhomes). This alternative would also reduce the estimated number of people anticipated to occupy the new development from 3,180 people to 2,186 .</p> <ul style="list-style-type: none"> A reduction to 825 units is a meager reduction. A reduction to approximately 250 units would seem more appropriate to blend in with the existing community. Try an analysis of this. An estimate of 2.65 individuals per unit seems very low. These days the trends are moving to 3-4 individuals per unit as families combine. With that number the total in this project would likely reach 3600-4000 individuals. Regardless, a 30% increase in population is drastic and dropping it all on 50 acres is irresponsible from a planning perspective. Imagine the impact in the Ralph’s Shopping Center parking lot! As it is now, it is crowded, jammed and borders in being unsafe. 	<p>I116-13</p>
<p>o Land Use:</p> <ul style="list-style-type: none"> <u>Project Site Has Low Village Propensity vs. CMR Plaza and Residential Area:</u> <ul style="list-style-type: none"> Per San Diego General Plan Land Use and Community Planning Element: (EIR Pg. 112) - “According to Figure LU-1 of the Land Use and Community Planning Element, the project site itself has low Village Propensity, however the area immediately to the north (residential and Carmel Mountain Plaza) is considered to have higher Village Propensity.” This supports the notation that mixed-use development of the CMR Shopping Centers would be more beneficial to the community than the proposed project. <u>Project EIR Omits Walkability from City of Villages Compliance Evaluation:</u> 	<p>I116-14 I116-15</p>

- I116-13** Refer to **Master Response 10** regarding alternatives. Refer to **Master Response 9** regarding population inducement.
- I116-14** Comment noted.
- I116-15** Refer to **Response to Comments 02-20** through **02-27**.

- Table 5.1-2 (EIR Pg. 126) - Project's Consistency with City of San Diego's General Plan : The project is not compatible with the City of Villages Strategy.
- Per the EIR, City of Villages Strategy. "Mixed-use villages located throughout the City and connected by high-quality transit."
- The EIR omitted the term "walkable villages." Per pg. ME-5 of the Mobility Element of the City of San Diego's General Plan, "The strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to the regional transit system."
- Pg. ME-6 of the Mobility Element of the General Plan under goals says:
 - Walkable Communities Goals: A city where walking is a viable travel choice, *particularly for trips of less than one-half mile*.
 - Carmel Mountain Ranch is not a compact, walkable community. The Community Plan for Carmel Mountain Ranch was approved in 1984, 18 years before the City of Villages Strategy was approved by the city council. The Transit Center was added to the southwest corner of Carmel Mountain Ranch in 2014 and is 1.4 miles (and a 130 foot climb) away from the community Town Center.
 - The city of villages concept calls for compact, mixed-use, and walkable villages that are connected to the regional transit system.
 - Only a small portion of the proposed development is within a half-mile of the transit center, approximately 276 units. Unit 16 is about 2 miles walking distance from the Transit Center and 0.4 mi from Ralphs. Units 9 and 10, with a projected 500 residents, are on average 1.5 miles from the Transit Center and 1 mile to Ralphs, exceeding the 1/2 mile walkable goal in the City's Mobility Element. (using the clubhouse, 14050 Carmel Ridge Rd and 12001 Ferncrest for averages).
 - In addition to the distances there are the extreme elevation differences between most of the new units and either the Shopping Center or the Transit Center. Further, the topography, street layout, and locations of Trail points of connection to existing streets force walking paths to traverse steep (up to 10% slopes) grades to move around the CMR community. See

I116-15
Cont.

Appendix A, Carmel Mountain Ranch Elevation Maps for detailed support

▪ Project EIR Misleads in Its Walkability City of Villages Compliance

Evaluation:

- Table 5.1.2 (Pg. 143) Project's Consistency with City of San Diego's General Plan:
 - Mobility Element A) Walkable Community Goals:
 - "A city where walking is a viable travel choice, particularly for trips of less than one-half mile."
 - "A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities."
 - The Project's analysis of walkable community goals is inadequate because it does not include distance and topography information. In most cases distances are too great and hills are too steep for casual walks to the store.
 - The "Trails" being described as connecting the community are trapped by existing houses and in only a few cases actually save time or energy over walking existing sidewalks.
 - The safety of the paths may become a concern as casual bicycle riders find them too steep and mountain bike riders find them challenging and thrilling for the same reasons. With widths varying from 5 to 10 feet, and some parts surfaced with Decomposed Granite walkers may find it uncomfortable to share them with bicycles passing at substantial speeds and the handicapped impossible.
 - The issue is the same with regards to walking distances to the Transit Center and Shopping. Most of the project is greater than 1/2 mile to either the Transit Center or Shopping. The former golf cart trails meander thru the community and connect the former fairways to each other. They are surrounded by existing homes and accessible to residents of The Trails. Existing residents would have to access the trails where they exit onto the sidewalk.
- A Foundation for Mixed-Use Development Already Exists in CMR Retail Centers:
 - The City's climate action plan requires less dependence of automobile transportation. The City of Villages concept should be

I116-15
Cont.

instituted in walkable communities. The Trails project does not meet the criteria due to the steep hills, distances to shopping, and lack access to public transportation outside of the Ted Williams/I-15 interchange. Walkable developments in CMR would be next to or part of the Retail Centers. The “neighborhoods” described in the Trails literature are normally referred to as apartment or condominium complexes. They are definitely not villages due to lack of services. Existing infrastructure would allow affordable units to be constructed. Four stories above retail or parking lots can be done and would create a walkable community where a car is not required. Availability of grocery, hardware, wholesale, restaurants, entertainment, pharmacy and libraries can eliminate the need for a car. Units can be constructed which time-share parking spaces with businesses, and transit options via enhanced bus service would make sense because of the increased number of possible riders. Proximity to the Retail Centers and Office/Tech/Light Industrial businesses offers a wide range of employment opportunities.

o **Transportation:**

▪ VMT Mitigations Using Bicycles on Trails Ignore Shortcomings:

- The mitigation option regarding VMT impact on transportation/circulation may not be effective. On table 5.2.2 outline two measures of mitigation. An onsite bicycle repair station and 600 short-term bicycle parking spaces – Several problems arise here. The golf course is located on some very steep terrain making bike travel challenging. Additionally, the project's trails are only 5-8 feet wide of varying composition and they are expected to handle walkers, runners, casual bikers, skateboarders, baby carriages. Adding bike commuters will overload the trails presenting a safety concern. Even on Lake Miramar's wide perimeter road there was a bicyclist killed due to collision with another biker.
- The Trails are likely not ADA compliant. My son is in a wheelchair and could not negotiate the cart paths as they exist.

▪ VMT Analysis Does Not Properly Reflect Increased Greenhouse Gas Emissions:

- Vehicle Miles Traveled and Greenhouse Gas Emissions:
 - o One reason VMT analysis was adopted in SB 743 was to promote public health through a reduction in greenhouse gas emissions. Adding 8,282 average daily trips to this small community is not going to promote public health through a reduction of greenhouse gas emissions. The VMT figures provided bear this out: "The census tracts containing the

I116-15
Cont.

I116-16

I116-16 Refer to **Response to Comments 02-28** through **02-34**.

Project (170.56, 170.55, and 170.39) have VMT/Capita of 21.7, 21.4, and 23.2, respectively. These values are between 32-43% above the VMT significance threshold of 16.2." Appendix G, Vehicle Miles Traveled Analysis, pdf page 12. These results are dramatically contrary to the City's Climate Action Plan goal of reducing greenhouse gas emissions. City of San Diego Climate Action Plan, Adopted Dec 2015, Chap. 2, Reducing Emissions. The Draft EIR and supporting Appendices are deficient in that the specific greenhouse gas emissions to be caused by the abnormal increase in VMT levels do not appear to be quantified, and therefore the environmental impact is not appropriately analyzed. In fact, the Draft EIR, Section 5.7, Greenhouse Gas Emission, does not analyze the specific greenhouse gas emissions to be caused by the abnormally high VMT levels.

- Bicycle-Use Based VMT Mitigations Not Shown to be Applicable to CMR:
 - The Developer should receive no VMT mitigation credit for bicycles, bicycle racks, and/or bicycle repair stations. The VMT mitigation effort of bicycle racks and repair stations (Draft EIR Section 5.2, pdf page 250, Table 5.2) have no factual basis in CMR. CMR is not a bicycle community, because, among other reasons, it is too hilly. I am an avid bicycle rider, but would not consider riding on the Trails (cart paths).
- Local Mobility Analysis and EIR Do Not Include Project Impacts on I-15 and SR-56:
 - The Draft EIR and the Local Mobility Analysis (App. C) do not present or analyze the impact of increased traffic on I-15 and SR-56 segments. I-15 is completely built out in this area and there is no publicly known funded or scheduled upgrades to SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical. The Local Mobility Analysis at pdf pages 47-70, and the entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs on these critical segments.
- Transit Priority Area Designation Is Misleading Due to the Limited Routes:
 - The TPA criteria are met technically but practically, only proposed Units 5 and 6 are within walking distance of the Sabre Springs/Peñasquitos Transit Station, and bus route support is limited to the Downtown San Diego employment area and north to Escondido. There are no known future Light Rail connections planned, and the station was constructed to be a Park & Ride for downtown workers (where it is successful). However buses are not

I116-16
Cont.

<p>provided to the Sorrento Mesa and Sorrento Valley areas where high tech and bio tech jobs exist.</p>	<p>I116-16 Cont.</p>	<p>I116-17 Refer to Response to Comments 02-35 through 02-38.</p>
<p>o Greenhouse Gas Emissions:</p> <ul style="list-style-type: none"> ▪ <u>Unmitigated Greenhouse Gas Emissions Violate City and State Climate Action Plans:</u> <ul style="list-style-type: none"> • Greenhouse Gas Emissions will be excessive due to the project <u>exceeding</u> Vehicle Miles Traveled guidelines established by the State of California. The City of San Diego has adopted its own climate action plan which this project also <u>exceeds</u>. Leaders will need to violate both City and State guidelines to initiate the Trails at CMR development. Global warming is a scientific fact! Nations are around the world now realize the we must make significant changes to prevent catastrophe to humanities home: Earth. The project must change and become environmentally responsible. 	<p>I116-17</p>	<p>I116-18 Refer to Response to Comment 02-39.</p>
<p>o Visual Effects/Neighborhood Character:</p> <ul style="list-style-type: none"> ▪ <u>Grading Plans Are Not Consistent with Community Plan and Trails Design Guidelines:</u> <ul style="list-style-type: none"> • The Project grading, being land locked and being a health hazard are not consistent with community plan. The CMR Community Plan was designed to have all dwelling units follow the topography of the hillsides. The Trails proposes to do massive amounts of grading to level hillsides to create large level pads. There are multiple problems with the strategy beyond community character. Large grading projects are rarely done in such close to existing houses. In many cases the project units are completely landlocked. The large earth-moving machinery working in the planned community will create fugitive dust from excavation that can cause emphysema, Valley fever and exacerbate COVID lung problems. To solve the problems associated with grading, the project should not allow leveling of hillsides. Each building should follow the CMR Community Plan by having each new building to be constructed on its own level pad. Phasing should be limited to a period of no more than two years of construction. 	<p>I116-18</p>	<p>I116-19 Refer to Response to Comment 02-40 and 02-41.</p>
<p>o Health and Safety</p> <ul style="list-style-type: none"> ▪ <u>Existing Conditions Impacts on Health and Safety:</u> <ul style="list-style-type: none"> • Physical Conditions: Analysis of issues in and around the property: <ul style="list-style-type: none"> o Note that the former golf course used various chemicals, herbicides, pesticides, petroleum products and nowhere does the EIR state that soils tests were done in areas to be graded. With commencement of grading significant health risks could develop. 	<p>I116-19</p>	

- Pg. 404 states:
 - "... a single 500-gallon underground storage tank (UST) containing gasoline, which was installed in 1989 and removed in 1993, ..." Were soil samples taken and tested? There is no indication that they were.
 - "... as well as the handling and storage of lead-acid batteries at the project site in 2017." Were tests done for contaminants?
 - "... The Carmel Mountain Ranch Country Club listing refers to the handling and disposal of 1.0425 tons of "unspecified oil-containing waste" in 1998.." Again was there testing and a plan for insuring no contaminants?
 - "... One additional soil sample was also analyzed for TPH; volatile organic compounds (VOCs); benzene, toluene, ethylbenzene, and xylenes (BTEX); and total recoverable petroleum hydrocarbons (TRPH). Minor detections of 1,1-dichloroethene (DCE) at 1.2 milligrams per kilogram (mg/kg) and toluene at 4.1 mg/kg were reported. The DEH Site Assessment and Mitigation (SAM) Program reviewed the soil analytical results and determined *that no further action was required.*"
 - "Further, the phase I ESA noted the presence of a two-stage clarifier on the project site, located to the east of the clubhouse, related to the former electric golf cart wash area. Although there are no reported issues or violations associated with the clarifier, *the existing clarifier could result in soil contamination at the project site.*"
 - *The EIR does not explain plan of action taken to ensure public safety. Specifically if the soil been tested or not? If not, why? And what was the reason to believe there would no risk of dust contamination during construction?*
- Pesticide Contamination Risk
 - Pg. 405 states: "a recognized environmental condition (REC)..."
 - *"The ongoing pesticide application on the site leading to accumulated residual pesticides in soils would be considered a REC."*
 - *Again, the EIR fails to state if each fairway spot was checked for chemical residue in the soil (to what depth?) for herbicides, pesticides etc? These will become airborne during excavation and grading and there did not appear to be a reference to this possibility in the Air Quality Section.*
- Safety and Privacy Issues Caused by Opening Trails to Public Access

I116-19
Cont.

I116-20

¶I116-21

I116-20 Refer to **Response to Comment O2-42**.

I116-21 Refer to **Response to Comment O2-43**. Additionally, privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety. Refer to **Master Response 2** regarding private views.

<ul style="list-style-type: none">• Safety and privacy problems are caused by opening the trail system in the development. Currently, the closed golf course is separated from single family homes by a bar style slotted metal fence. The purpose of the fence was to provide views to the golf course. Once complete the trail system will be open to the public. These fences will allow views into the golf course frontage homes at night. As a private area that has not been a concern for residents. Once open the public it provides a perfect opportunity for criminals to observe residents, track their patterns and rob their homes. New fencing must be provided by the developer to protect homeowners.	I116-21 Cont.
<ul style="list-style-type: none">• <u>Underpass Tunnels Will Likely Present Serious Safety Issues:</u><ul style="list-style-type: none">• It is likely that even during daylight hours these tunnels will prove to be an attractive nuisance . That is, they may attract the homeless as they have done even when the golf course was operational. At present, the tunnels are very attractive to young people for parties and the consumption of alcohol/drugs. Local authorities have been notified as to these occurrences several times.• The possible risks for pedestrians and casual bicycle riders is certainly much different from what it was for golfers in relatively fast- moving electric golf carts. During course operation the CMR Country Club staff regularly traveled the entire course and there were posted no trespassing signs. As a public walkway it will be much less regulated, and lighting alone will certainly not ensure a safe and clean environment.	I116-22
<ul style="list-style-type: none">• <u>Public Safety Issues Presented by Tunnels Are Not Addressed:</u><ul style="list-style-type: none">• When evaluating the Project's Consistency with City of San Diego's General Plan (Table 5.1.2 (EIR Pg. 170) <i>Urban Design Element Policy UD-A.17. the Safety of the Tunnels is not addressed. The General Plan Goal/Recommendation is: "Incorporate crime prevention through environmental design measures, as necessary, to reduce incidences of fear and crime, and design safer environments."</i>• Design projects to encourage visible space and "eyes on the street" security that will serve as a means to discourage and deter crime through the location of physical features, activities, and people to maximize visibility.• <i>The analysis for this section does not address the safety impact of the 5 pedestrian tunnels.</i>• The developer wishes to use the golf cart tunnels for The Trails project. These will no longer be tunnels for golfers and their carts, but part of the Trails which states the pathways (including tunnels) will be used for the public to include: walkers, joggers, runner,	I116-23

I116-22 Refer to **Response to Comment O2-44.**

I116-23 Refer to **Response to Comments O2-45** through **O2-47.**

<p>skateboarders, bicyclists, etc. Those tunnels cannot support that type of varied traffic and keep within safe operations.</p> <ul style="list-style-type: none"> • Keeping the golf cart tunnels open and used by the public exposes users to the potential of physical harm. • Users will be out of the public view while inside and the length of the tunnels is significant with one as long as 185 feet. • Having large parts of the walkway out of view from the public can encourage antisocial behavior such as littering, graffiti, drinking/drugs, loitering and crime. • Litter and nuisance issues could evolve from people that are homeless attempting to use the tunnels as temporary or permanent shelters. • Users could be robbed or physically/sexually assaulted while in the tunnels. • This is a prime area for lawsuits from the public aimed at the owner. • Remove this risk by filling in the tunnels. <p>o Biological Resources:</p> <ul style="list-style-type: none"> ▪ <u>Project Consistency with Conservation Element of SD City General Plan:</u> <ul style="list-style-type: none"> • Pg. 210 G. Biological Diversity: The developer says, <i>"The project would retain the majority of the 164.5- acre project site as open space."</i> • The community <i>would lose over 50 acres</i> of Open Space they have enjoyed and was planned as an integral part of the community. • Wildlife that has moved un-hindered through the property would now be forced into narrow corridors which will change the dynamics of species interactions. In many locations only the 15 foot width of the 50-foot buffer zone will actually be free from paved encroachments, as compared with 150 to 300 foot planted widths previously. <p>o Historical Resources:</p> <ul style="list-style-type: none"> ▪ <u>Trails Project Does Not Maintain Character & Identity of CMR:</u> <ul style="list-style-type: none"> • <i>The San Diego General Plan Historic Preservation Element</i>, (EIR Pg. 116) - "encourage appreciation for the City's history and culture, maintain the character and identity of communities..." <i>The project does not maintain the character of Carmel Mountain Ranch</i> due to reduction of open space (<i>never to be regained</i>), density, scale and architectural design. <p>o Population and Housing:</p> <ul style="list-style-type: none"> ▪ <u>Affordable Housing Will Not Offer Ownership Opportunities:</u> <ul style="list-style-type: none"> • Will the development result in affordable housing? There will be some limited deed restricted but the vast majority will not be 	<p>I116-23 Cont.</p> <p>I116-24</p> <p>I116-25</p> <p>I116-26</p>
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- I116-24** Refer to **Response to Comments O2-48, O2-49a, and O2-49b.**
- I116-25** Refer to **Response to Comment O2-50.**
- I116-26** Refer to **Response to Comment O2-51.**

- affordable and most will be rental. Housing projects should be affordable and offer opportunity for purchase instead of rental.
- EIR Incorrectly Minimizes the Impacts of the Project Building Heights:
 - Section 5.1.3 Impacts Analysis, Issue 2: Impact of deviations: (EIR Pg. 121)
 - *EIR analysis incorrectly states:* “In the instances where maximum building height is greater than 40 feet, it is likely that differences in grade and topography would not result in a substantial visible difference between existing and proposed development. Similarly, variations in lot area, setback, width, depth, and frontage would not result in development that is substantially visibly different from the surrounding community.”
 - The project would be substantially different than existing community. Based on elevations shown in the Vesting Tentative Map set, most of the graded building pads *are* close in elevation to adjacent existing homes. The golf course is surrounded by 1-2 story single family homes whereas The Trails are 100% multi-family units, 3-4 stories in height with greater heights and densities than the surrounding existing development.
 - *The EIR also states:* “Further, per California Public Resources Code Section 20199 (d)(1), aesthetic impacts resulting from a residential project on an infill site within a Transit Priority Area are not considered significant” and incorrectly concludes that “As deviations requested would not affect any other environmental issue or sensitive resource, it would not result in a physical impact on the environment.” This is wrong because:
 - Increased heat-trapping by replacing large areas of grass, dirt, and plants with concrete, stucco, and asphalt>
 - Disruption of cooling wind patterns, especially by unit 9, which would sit at the highest point of CMR, and block prevailing westerly wind which currently cools homes directly to the east of that site.
 - Street traffic along Carmel Ridge Road will be substantially increased by residents of units 9 and 10, while the buildings of unit 9 will reflect that noise back towards the homes on the east side of the street.
 - Addition of 1,200 New Housing Units Substantially Impacts the Community:

↑ I116-26
Cont.

I116-27

↓ I116-28

I116-27 Refer to **Response to Comments 02-53** through **02-55**.

I116-28 Refer to **Response to Comments 02-56** through **02-65**.

- EIR Section ES.3 Objective 1: “Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.”
- CEQA states that development must not violate the character of the general plan.
- The local residential communities as evidenced by the CMR community plan are as follows:
 - *Population:* The 5,039 residential units are estimated to generate a population of approximately 12,000 individuals. This number was projected from SANDAG’s population figures extracted from the federal 1990 census data. An average of 2.35 persons are anticipated for each dwelling unit within Carmel Mountain Ranch.
 - *Community Balance:* A balanced community encompasses a variety of housing types related to acreage/density numbers. A wide range of densities with creative site planning will provide a broad economic offering within the community.
 - *The subtraction of the 175 acres of the former golf course and adding 1,200 multi-family units dramatically changes the dynamics of the community.*
 - The addition of 1,200 multi-family unit doubles the number of medium density units. This disrupts the balance of housing types.
 - The length of phasing could result in noise, pollution and construction for a very long timeframe of 5- 10 years.
 - The grading equipment will damage the environment, roads and noise to an existing community of 12,000 people.
 - Open space lost and can never to be regained!
 - The community had too few parks based on City guidelines before the development.
 - When the community was built, an exception was made to set aside the large open space for the golf course.
 - Note: we are not adding open space, but losing it.
 - In our case 11 of the former 18 holes are to be developed resulting in a net loss of open space of 61%.
 - Topography was to be preserved as part of the Community Plan; view corridors are protected by constructing buildings that follow the counter of the hillsides. The Community Plan in the Parks and Open Space element speaks of the following: Incorporation of

I116-28
Cont.

the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole, linkage of open space and public parks into a continuous network of bike paths and pedestrian trails where it can be done in a manner sensitive to the topography and landforms traversed, retention of open space acreage for views easements, noise buffers or preservation of natural, irreplaceable environments. The Trails at CMR devastates the Community plan, the topography, the open space and the community character as protected by CEQA!

- AR1-1 is the zoning according to the community plan but in the SD General plan it is identified as Parks and Recreation. The City's Climate Action plan requires additional park and recreation spaces. The City should not allow destruction of Park and Recreation space. There are many opportunities to add affordable housing without destroying park and recreation space. We should look to existing retail shopping centers that will continue to see vacancies due to the explosion of online shopping and the closure of brick and mortar retail.
- Also note, we are in a new world order with this Pandemic. We will never see things return to what they were. Working from home has proven effective. That has and will cause more retail/industrial space to become vacant. That is where the focus for more housing needs to be otherwise our Malls will lay fallow.
- Our library impact is impacted. We need more library space vice a community pottery art building. An arts center in exchange does not offset massive environmental damage of this project.
- The concept of calculating open space is flawed. The golf course is 167 acres. The Developer calculates that they will construct buildings on 51 acres. They state that 2/3rds of the property will remain. Each hole/fairway that is built upon should be removed from consideration as open space. As such the lost open space is 61%. Further each hole/fairway/unit will have many buildings. In what about the roads and parking areas.

o **Wildfire:**

17



I116-29 Refer to **Response to Comment O2-66**.

I116-30 Refer to **Response to Comment O2-67** through **O2-69**.

I116-28
Cont.

I116-29

- Fire Evacuation Analysis Does Not Fully Reflect Project Impacts:
 - *The Draft EIR's treatment of fire evacuation ignores historical data.*
 - The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Evacuation times are not even mentioned. Further, the Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. Historical data has shown these events happening in 2003 and 2007. Now analyze the addition of 3,180 additional residents and their vehicles.

I116-29
Cont.

◦ **Project Alternatives:**

- Project Alternatives Should Include a Low-Unit-Count Option:
 - The four Project Options are 1,200 units, 825 units, Change of Footprint and No Project. The 1,200 units, 825 units and Change of Footprint options result in a significant unmitigable impact on transportation/circulation, public service, and population and housing. It is recommended that there be an additional option where the significant impacts can be mitigated. A 200-250 unit option would likely result in a good compromise.
- Project Reduced Density Option Draws Invalid Conclusion:
 - Reduced Density option comes to the conclusion that since the 825 unit option would not solve the significant and unavoidable impacts it makes sense to not consider this option due to the only "slight" reduction in reduced population, housing and traffic and transportation impacts. That conclusion is faulty. In fact, the reduced option would reduce the population from 3,180 people to 2,186. That represents a 31.4% reduction. By any measure that should not be considered slight. Further if the 825 unit option does not improve impacts, then evaluate options between 0 and 825 units!
- Mixed-Use Development in Shopping Centers Is Not Addressed as an Alternative:
 - There are alternatives for housing in areas that are already developed for commercial use. Due to factors such as online shopping, increasing COVID-caused work-from-home impacts, and higher vacancies in retail and office space, there are increasing opportunities for mixed-use developments.

I116-30

Sincerely and....

Make It A Good Day,

Rick Ludwig "Wigs"
12078 Eastbourne Rd.
San Diego, CA 92128
858-204-2160

Comment Letter I117

From: Hadi Rasouli <hadi.rasouli@gmail.com>
Sent: Tuesday, February 2, 2021 10:19 AM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Ms. Shearer-Nguyen

This email is about my concerns regarding "The Trails at Carmel Mountain Ranch" project.

1- As a homeowner, in Carmel mountain ranch with a home with a backyard facing golf course, one of the biggest joys in our house was watching wildlife in our backyard. watching Eagles, Woodpeckers, different types of birds, Rabbits (Regular visitors to our backyard and inside community). We also spotted, Coyotes and bobcats! Every spring and fall, during rain a temporary river was going through the middle of the golf course and docks came to swim which was an absolute beauty for our little daughter. Also, the natural sound of frogs is a beautiful soundtrack before sleep! All these natural beauties will be gone if this project goes ahead!

2- Adding 1200 units to an already crowded neighborhood, without any improvement to infrastructure will create environmental hazard and create safety issues for current residents. In case of natural disasters such as earthquakes and wildfires, current infrastructure has a very limited capacity to provide enough escape routes to current residences. adding 1200 multi family units will have Significant dangerous impact on the safety of the Carmel Mountain Ranch residences.

3- Adding 3-4 story buildings will not match the current housing style of carmel mountain ranch which are either one or two stories buildings.

4- When we bought our house in 2014, Highland Ranch elementary school rating was 9/10 and shoal creek elementary school ranking was 10/10 based on "[greatschools.org](https://www.greatschools.org)". Now shoal creek elementary school rating is 7/10 and Highland Ranch elementary school rating is 8/10. Adding more residents without improving school resources will impact the education of the next generation of this community.

Regards,

Seid Hadi Rasouli

Response to Comment Letter I117

117 Seid Hadi Rasouli

February 2, 2021

I117-1

Wildlife is discussed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated.

I117-2

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated.

Geologic hazards, including earthquakes, are discussed in Section 5.6, Geologic Conditions, of the Draft EIR. Geologic conditions impacts were determined to be less than significant.

Chemical and historical site hazards are discussed in Section 5.8, Health and Safety, of the Draft EIR. Health and safety impacts were determined to be less than significant.

Wildfire hazards and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I117-1

I117-2

I117-3

I117-4

Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

I117-3 Aesthetics impacts, including as pertaining to project height, bulk, and scale and housing style, are discussed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I117-4 Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Comment Letter I118

From: Suzanne Clark <suzanne.clark@live.com>
Sent: Wednesday, February 3, 2021 5:33 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] CMR golf course plans

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,
I am a resident of CMR and believe housing within the golf course grounds is a HUGE mistake. It's too crowded here already. Ever go to Ralph's or Costco? No. No more building.
Instead, why not consider just leaving it as an open space, with the trails as are planned, but also with a dog park, an obstacle course, picnic tables, etc.
I would like to see my property increase in value. Your building plans will dilute our values because of such high density. Please don't build.
Regards,
- Suzanne Clark

I118-1

Response to Comment Letter I118
118 Suzanne Clark
February 3, 2021

I118-1 Pursuant to CEQA Guidelines 15064(e) and 15131, the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not a physical change to the environment.

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Comment Letter I119

From: TL Fu <tfu@yahoo.com>
Sent: Tuesday, February 2, 2021 8:36 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project # 652519, Trails at Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

14383 Seabridge Lane
San Diego, CA 92128
2/2/2021

Dear Sir / Ma'am,

I am a resident of Carmel Mountain Ranch, and I would like to comment on the Environmental Impact Report of Project # 652519, Trails at Carmel Mountain Ranch.

We have been living on Seabridge Lane, one of the through streets in the community, for more than 20 years. Although a minor street, Seabridge Lane has been a de facto throughfare with high volume of vehicular traffics, ever since the early days of the community. It is a short-cut connecting apartment complexes and shopping malls in the vicinity. Speeding motorists are a daily concern, so much so that speed bumps and stop signs have been installed by the city. As it is, the situation is already short of being acceptable.

The proposed project will undoubtedly add to the traffic volume in the community. The situation on our street can only be worse, as there is no plan in the project to address the issue. Now it is not only a concern to us, but a fear.

Thank you for your attention to this matter.

Yours sincerely,
Taoling Fu

Response to Comment Letter I119
119 Taoling Fu
February 1, 2021

I119-1 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I119-1

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Comment Letter I120

From: Troy Daum <Troy@wealthanalytics.com>
Sent: Wednesday, February 3, 2021 12:57 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Hoeprich, Jack <JHoeprich@sanidiego.gov>; Andrade, Evelyn <Evlyn.Andrade@sdcounty.ca.gov>; Eric Edelman (edelmanrealty@gmail.com) <edelmanrealty@gmail.com>; Troy B. Daum - Wealth Analytics, INC (troydaum@icloud.com) <troydaum@icloud.com>
Subject: [EXTERNAL] Daum EIR Comments The Trails at CMR Project No. 6526519/SCH 20200396006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Subject: Project No. 6526519, SCH No. 2020039006

Dear Ms. Elizabeth Shearer-Nguyen, Department of Development Service

Response to Comment Letter I120
120 Troy Daum
February 1, 2021

I am writing today as a resident of Carmel Mountain Ranch for the past thirty years. I have significant concerns with the Environmental Impact Report of the proposed development.

I live on former hole number 6, labeled as unit 6, in the New Urban West documents. The unit is a very steep, narrow, and a former par-three hole. The plan is to do extensive grading to create a level pad to construct 128 units on 3.42 acres (reference table 3-1 Proposed land use, EIR).

Leveling of the hillside on unit 6 and other locations is inconsistent with the open space resource lands and resource goals policy RE-F-1. Let me be clear that my expressed concerns are for the entire project, not just unit 6.

Refer to the grading plan in Appendix T. Numerous units are on steep slopes. The project proposal is to flatten hillsides to build level pads for buildings. The EIR incorrectly suggests that mitigating hauling and conveying the earth is sufficient. The EIR needs to reflect the following concerns:

- Leveling the steep hills moves dirt from the top of the hill to the bottom. The fill dirt will be many feet high depending on location. The homes on the bottom of the slope will be looking at the building pad's fill. For example, a single-family home may sit next to 10 feet of infilled dirt with a 48-foot building constructed on top, totaling an unacceptable 58 feet tall. The City should disallow any deviation to the 40-foot height limit.
- Grading will create massive amounts of greenhouse gas. The EIR estimates 426,832 hours of construction time.
- Grading will create fugitive dust, which has been proven to cause respiratory problems and death, including but not limited to the following: emphysema, asthma, lung cancer, valley fever (Mayo Clinic [- Grading for large construction projects is usually done on open spaces far from areas that are already populated by homes, apartments, and condos. Existing homes landlock the Trails project. The EIR incorrectly states that mitigation will prevent health hazards. The earthmoving equipment will be less than 50 feet away from thousands of people's homes.
- Construction on units 16 and 17 are situated next to Highland Ranch Elementary School. Fugitive dust will expose hundreds of children/teachers to the health hazards described above.](https://www.mayoclinic.org/diseases-conditions/valley-fever/symptoms-causes/svc-20378761#:~:text=Valley%20fever%20is%20caused%20by,%2C%20California%2C%20Texas%20and%20Washington, and it may be a contributing factor to recovery from COVID.
COPD, lung disease, can be caused by inhalation of insecticides. Many chemicals were sprayed on the land when it was a golf course. Much of the fairway grass was covered over by decomposed granite in 2015. The golf course renovation was part of a turf removal program paid for by the Metropolitan Water District. The EIR needs to study further the health risk of digging up the embedded chemicals during grading.
Fugitive dust would be created by the movement of 957,607 yards of cut and 995,763 yards of fill, according to the EIR
The project phasing is scheduled to be four years. In discussion with Jonathan Frankel of New Urban West, he stated,)

According to the EIR, the project would develop 52.9 acres of the available 164.5 acres. As presented, it would destroy 32.1% of open space. The developers calculations of open space are deeply flawed they appear to omit ancillary buildings, roadways, and parking lots. Those calculations are misleading.

The reality is 11 of the 18 holes would be developed, 69%. The EIR suggests that it would leave open 67.9% of the open space. It appears to be the New Urban West calculation is based upon building footprints only. Each developed unit to with 10 or more buildings should more accurately be described as a developed space. Therefore the actual amount of open space after development is 31%.

I120-1

As explained in **Master Response 1**, as well as Table 5.1-2 and Table 5.1-3 of the Draft EIR, the project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan. Refer to **Response to Comment O2-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

I120-2

Discussions on visual character, scenic vistas, and project bulk and scale are provided in Section 5.17, Visual Effects/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Section 5.1, Land Use and Planning, of the Draft EIR assessed potential impacts associated with the proposed deviations that are proposed as part of the project. As noted in Section 5.1, Land Use and Planning, of the Draft EIR, the deviations requested would not result in a secondary physical impact on the environment. Refer to **Master Response 1** regarding the proposed deviations.

I120-3

As detailed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR, the project impact related to greenhouse gas emissions would be less than significant. Refer to **Master Response 8** for additional details.

I120-4

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

I120-5

Section 5.8, Health and Safety, of the Draft EIR addressed potential contamination issues. Section

5.8.2 specifically addressed the potential for previous pesticide use and the potential residual pesticides within soils. As explained therein, compliance with the County's Department of Environmental Health Voluntary Assistance Program (DEH VAP) program would ensure that no one would be exposed to toxic substances, such as soil contamination from previous uses on the site, including pesticides and herbicides. Impacts were determined to be less than significant. Also refer to **Master Response 7** regarding the Health Risk Assessment prepared for the proposed project.

I120-6 Refer to **Response to Comment I120-4**.

I120-7 Refer to **Response to Comment I120-4**.

I120-8 Refer to **Response to Comment I120-4**. Additionally, a Health Risk Assessment was prepared for the project and is summarized in Section 5.3, Air Quality and Odors, of the Draft EIR. The Health Risk Assessment concluded construction-related emissions would result in less than significant health risks to existing and future sensitive receptors. Refer to **Master Response 7**. The comment addresses a subject area, which received analysis in the Draft EIR.

I120-9 Refer to **Response to Comment I120-8**.

I120-10 To clarify, Section 3.3, of the Draft EIR states that approximately "111.0 acres of development would be composed of parkland, open space, and buffer area." The project site is approximately 164.5 acres. Thus, 68% of the site would remain as recreational open space. The Draft EIR's open space calculation in the EIR is accurate. Additionally,

Refer to the attached Transportation Impact report for a schematic of the buildings. Unit 6, as an example, has 10 apartment buildings. According to ES.5, the plan is to construct the 10 buildings on 3.6 acres of the 7-acre site. When you look at the diagram of the buildings, you begin to realize that the suggestion that the balance of 4 acres is open space is absurd.

That misleading and flawed logic is presented in the whole EIR. Refer again to the diagram of the building on the other units.

Each unit needs to be recalculated in the EIR. That new result would reflect that 11 of the 18 holes are being developed. The reduction of open space would be 61.1%. That loss is inconsistent with environmental plans at the state, county and city levels.

The EIR violates the San Diego General Plan regarding Park, Open Space, and Recreation (5.7-16). All land decisions are to be guided by the general plan. One of the primary tenants is to protect open space, parks, and recreation. The Trails at Carmel Mountain removes 61.1% of the Park and Open space.

In conclusion, there is only one option to consider. The California Environmental Quality Act section 15093 requires plan options the reduce the impact of projects on the environment. The Trails project offers no measures to correct the unmitigable damage in transportation, public service population, and housing.

The only viable option as presented would be the no project/no development option ES.8.1.

Regards,

Troy

Troy B Daum, Carmel Mountain Ranch Resident

13755 Royal Melbourne Square San Diego, CA 92128

Troy Daum, CFP®
Principal

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I120-10
Cont.

I120-11

I120-11

as explained in **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, the project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan. Refer to **Response to Comment O2-11a** regarding open space.

Refer to **Master Response 10** regarding alternatives.

Comment Letter I121

From: Vineet Kakar <vineetkakar@gmail.com>
Sent: Wednesday, February 3, 2021 10:04 AM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Ms. Shearer-Nguyen and City Council,

I am Vineet Kakar, a resident and owner of property in Carmel Mountain Ranch. My family and I strongly oppose the proposed Trails at Carmel Mountain Ranch Project (heretofore the Project) in its current form. The Project destroys the community character of Carmel Mountain Ranch and presents a number of unmitigable environmental impacts. I am not opposed to new development in the area but a very congested multi level condominium complex just next to my home will result in many environmental issues as well as loss of open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. Here are the few things I would ask you to consider before making any decision.

I121-1

Destruction of Community Character : I bought my house in 2015 to be next to natural surroundings paying a premium to have a backyard next to a golf course. With the current plan I lose what I paid for to raise my family around. Construction of 1200 condos, apartments, and townhomes is totally inconsistent with the community character of Carmel Mountain Ranch. The Project destroys much of the green space and visual aesthetics that my family and I enjoy today. The proposed project consists entirely of town homes and three and four story apartment buildings and condos, which I believe will not only take my privacy away from me but also reduce the sunlight that I receive at my house today. This may even lead to my solar panels that I am installing not to not produce enough Solar power.

I121-2

Loss of Open Space and Park Land : With the new development total open space will reduce from 112 acres to 52 acres creating a new level of impact on the climate of the area.

I121-3

Increased Wildfire Risk and Increased Evacuation Risk: In a nutshell with this development not only the density of population goes up but also but also results in increased risk of human generated fires from normal human activities (vehicles, power equipment, barbecues, etc.). Increased density may lead to slower evacuations/gridlocks in case of a wildfire or human generated fire.

I121-4

Massive Increase in Greenhouse Gas : The huge amount of greenhouse gas (GHG) released from this project exceeds any GHG goals of the Climate Action Plans of the City of San Diego and State of California. The project will result in a massive increase in GHG even after some minor mitigations on the City of San Diego checklist are implemented. This project does not take us closer to the 1990 GHG levels, the goal of the City's Climate Action Plan; it would not even come close to maintaining GHG at 2021 GHG levels.

I121-5

Reduced Air Quality : I want my family to breathe clean air but with the above mentioned increase in greenhouse gas in the neighborhood. This will also have an impact to the living beings who are using the open spaces to maintain the ecological balance of the area.

I121-6

Overall, I request you to consider my requests to provide me and my family some relief from the above listed dangers while reviewing and making a decision.

I121-7

Thanks
 Vineet Kakar
 14063 Montfort Ct
 San Diego, CA 92128

Response to Comment Letter I121

121 Vineet Kakar
 February 3, 2021

I121-1

The City acknowledges the comment as an introduction to comments that follow that address various environmental issues (i.e., community character, loss of open space, wildfire, evacuation, greenhouse gas emissions, air quality and traffic/congestion). Refer to responses below. Additionally, refer to **Master Response 3** regarding traffic/congestion.

I121-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding community character.

I121-3

Refer to **Response to Comment 02-11a** regarding open space.

I121-4

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I121-5

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

- I121-6** Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.
- I121-7** Comment noted.

Comment Letter I122

From: Gene Plagge <genedba@gmail.com>
Sent: Wednesday, February 3, 2021 7:05 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] the Trails at Carmel Mountain Ranch, Project Number 652519

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,
I live in the Bernardo Heights area, on Alta Carmel Ct.

I would like to say I think this project is exciting and needed for the city.
We need relatively affordable housing, and having public access to the trails is really great

Thanks,
Werner Plagge
12067 Alta Carmel Ct, San Diego, CA 92128

Response to Comment Letter I122
122 Werner Plagge
February 3, 2021

I122-1 Comment noted.

I122-1

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Comment Letter I123

From: Zeying Ma <zeyingma@yahoo.com>
Sent: Wednesday, February 3, 2021 7:41 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Sir or Madam,
 I am writing to express my concerns on the New Urban West's planned 1,200 units development including 60% rental units.

1) This development will devalue the single family neighborhood, which is unfair to the current residence. A result of that, many people who are needed technology workers/engineers may move out of Carmel Mountain and RB areas.

2) The massive development will significantly increase the crowdedness of the area. It is bad for the environment. If San Diego suburb is destroyed, it makes San Diego a less attractive place in the nation.

3) The development of 60% rental units will not help people in need. The commercial leasing company will maximize its profit, and renters have no control of rent price.

Thank you very much for your consideration in rejecting or modifying this project.

Best Regards,
 Zeying Ma

I123-1

I123-2

I123-3

I123-4

Response to Comment Letter I123

123 Zeying Ma
 February 3, 2021

I123-1

To clarify, the project would result in a total of 1,200 multi-family residential dwelling units. Specifically, the project would include 451 townhomes on approximately 26.2 acres, 543 market-rate apartments on approximately 19.1 acres, 78 affordable apartments on approximately 2.3 acres, and 128 mixed market-rate and affordable apartments on approximately 3.4 acres.

I123-2

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value is not a physical change to the environment.

I123-3

Comment noted.

I123-4

Comment noted.

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Comment Letter I124

From: Vivian Weiss <vrweiss@gmail.com>
Sent: Tuesday, February 2, 2021 5:55 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project No. 652519/SCH No. 2020039006.

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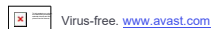
Hello,

My name is Vivian Weiss, and I am writing on behalf of myself and the Carmel Mountain Ranch community and our commitment and efforts to address the New Urban West project in Carmel Mountain Ranch, mainly the loss of a beautiful golf course being replaced by housing. On the northern side of Interstate 15 a previous golf course and hotel have already been eliminated for more housing.

There must be a balance between more housing and the preservation of our community atmosphere. I've lived in Carmel Mountain for 20 years and still love living here, but the overgrowth of housing diminishes its shine. All I'm asking is that you consider the balance of space versus overgrowth. 1200 additional units with an average of two drivers per unit is not sustainable. The increased traffic on Interstate 15 and Ted Williams Parkway alone will bear that out.

Thank you,

Vivian Weiss
 11936-8 Tivoli Park Row
 San Diego, California 92128



I124-1

Response to Comment Letter I124

124 Vivian Weiss
 February 2, 2021

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

I124-1

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Comment Letter I125

From: Bella Ferrer <wferrer@att.net>
Sent: Thursday, February 4, 2021 1:08 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] Comment to The trail at CMR

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To: Whom it may concern,
 My first & foremost concern is the negative impact it will have to our environmental initiatives for safety & preservation of our open space and vegetation.
 New Urban plan of building 1200 units which includes affordable housing that is 60% rental will create increase density, add traffic, massive environmental damage, hinder evacuation issues & safety, stress on schools, libraries, infrastructures with the proposed 25% increase in the population.
 The project does not maintain the character of the Carmel Mountsun Ranch community due to density & scale.
 And lastly, the New Urban project will be completely separate from the master planned community guidelines of the existing HOA.
 Because of the stated issues & concern above I am voicing my concern about the "The trails at CMR, project NUMBER 652519/SCH # 2020039006
 Respectfully submitted,

1

Bella R. Ferrer
 (original homeowner of CMR)
 14885 Heather Glen Way
 SD, CA 92128

[Sent from AT&T Yahoo Mail on Android](#)

I125-1

Response to Comment Letter I125

**125 Bella Ferrer
 February 4, 2021**

I125-1

The establishment of a separate HOA is not a CEQA issue. Refer to **Response to Comment 02-11a** regarding open space. Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Impacts related to libraries are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to library facilities were determined to be significant and unavoidable. Refer to **Master Response 6**.

Utilities and infrastructure impacts are discussed in Section 5.15, Public Utilities, of the Draft EIR. As discussed in this section of the Draft EIR, impacts to public utility systems were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I126

From: Ankur Gupta <ankurg2003@gmail.com>
Sent: Thursday, February 4, 2021 8:00 AM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear City Council:

I have the following concerns on the EIR for this project.

1. Project designs are not conforming to the character of CMR.

Refer Pg 164 Urban Design Element Policy UD-A.5 (Table 5.1.2 (EIR Pg. 164)) Part b. "Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character."

- Due to size and density, the Trails at CMR project is not consistent with the current development. Present apartment buildings are built away from single-family houses on stepped hillsides. If they are still close by, they are constructed on pads that are below such homes.

- Proposed buildings will in most cases be built on ground that is roughly level with adjacent homes, making it impossible to still consider Carmel Mountain Ranch a golf-course community as it was designed to be. Filling prime open space parcels with 3 and 4 story buildings will forever remove the look and feel that open green spaces bring.

2. Transportation : Local Mobility Analysis and EIR Do Not Include Project Impacts on I-15 and SR-56

The Draft EIR and the Local Mobility Analysis (App. C) are deficient because they do not present or analyze the impact of increased traffic on relevant Interstate 15 and SR-56 segments. Interstate 15 is completely built out in this area and there is no publicly known funded or scheduled upgrade to SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical. Some of the critical segments are I-15 Northbound from Poway Road to SR-56; I-15 Northbound from SR-56 to Carmel Mountain Road; I-15 Northbound from Carmel Mountain Road to Camino Del Norte; I-15 Southbound from Camino Del Norte to Carmel Mountain Road; I-15 Southbound from Carmel Mountain Road to SR-56; I-15 Southbound from SR-56 to Poway Road; SR-56 Eastbound from Rancho Penasquitos Boulevard to I-15; and SR-56 Westbound from I-15 to Rancho Penasquitos Boulevard. The Local Mobility Analysis at pdf pages 47-70, and the entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs on these critical segments, and the Draft EIR is therefore deficient.

3. Biological Resources Impact

Project Consistency with Conservation Element of SD City General Plan

Pg. 210 G. Biological Diversity: The developer says, "The project would retain the majority of the 164.5- acre project site as open space. Specifically, open space uses would be composed of approximately 111.27 acres."

- The community would lose over 50 acres of Open Space they have enjoyed and was planned as an integral part of the community. Once the open space is build upon its lost with permanent impact on ecology and wildlife. The golf course trees and turf were not only an integral part of the look and feel of the community but also provided 150+ acres of greenery that helped sequestering carbon from atmosphere. [See carbon sequestering and affect on local ecology/climate]

- Wildlife that has moved un-hindered through the property would now be forced into narrow corridors which will change the dynamics of species interactions. In many locations only the 15 foot width of the 50-foot buffer zone will actually be free from paved encroachments, as compared with 150 to 300 foot planted widths previously.

4. The Draft EIR does not specifically alleviate the grave danger posed by high wind-driven flaming embers and the resulting mass evacuation orders. In recent history there were mass evacuation orders which clogged the evacuation routes. The EIR must analyze this with future growth/roads development in the area and in conjunction with the impact of the additional 3100 residents and vehicles that this particular project brings.

It is not enough to simply state, as in the EIR that the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired (pdf page 613-4) or likewise.

Thanks,
Ankur Gupta
14382 Seabridge Ln

1

Response to Comment Letter I126

126 Ankur Gupta

February 4, 2021

I126-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan and the Community Plan.

I126-2

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Specific to traffic along I-15, the City's TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the Local Mobility Analysis.

I126-3

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources, including with regard to wildlife movement and buffer zones, were determined to be less than significant with mitigation incorporated. Refer to **Response to Comment 02-11a** regarding open space.

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

- I126-4** Wildfire and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Comment Letter I127

From: gmccllland <gmccllland@san.rr.com>
Sent: Thursday, February 4, 2021 3:06 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom It May Concern:

I have lived in Carmel Mountain Ranch since 1996. I can't begin to tell you how harrowing it was to have to evacuate twice during this time due to wild fires. The additional congestion and traffic with this new development just might cost me my life. Moreover, the proposed plan disrupts the open space that this community enjoys. If the developer would propose a plan where the project did not dense pack certain areas of our neighborhood, I could entertain it. However, as it stands now, this is simply a money grab for the developer at the expense of our community members.

Sincerely,
Greg McClelland

I127-1

Response to Comment Letter I127
127 Greg McClelland
February 4, 2021

I127-1

Refer to **Master Response 1** regarding density. Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5** regarding wildfire and emergency evacuation. Refer to **Response to Comment 02-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I128

From: janice.kawamura<janice.kawamura@sbcglobal.net>
Sent: Thursday, February 4, 2021 7:06 AM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: troy@wealthanalytics.com <troy@wealthanalytics.com>
Subject: [EXTERNAL] OBJECTION TO PROPOSED "The Trails at Carmel Mountain Ranch" Housing Development

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

As a homeowner in Walden, community in Carmel Mountain Ranch, San Diego, California, I fully **object** to the proposed "The Trails Carmel Mountain Ranch, Project Number 62519/SCH No. 2020039006.

Reasons for objection below:

Proposed Multi-Family Multi-story Construction is Not Compatible With Existing Homes Project Objective 1, Section ES.3 not met - as the range of housing types are not compatible.

Project Does Not Meet Objective to Provide a Range of Housing Types Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities. ~ The majority of CMR are 2-story single family residential, especially on the upper hilltops and central

Golf Course Blight Should be Remedied by Current Owners Project Objective 4, Section ES.3 not met - "The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought tolerant native Landscaping"

Dense housing units will cause negative impact to the environmental such as increased traffic resulting in unsafe streets for children, poor air quality, and destruction of native floral, fauna and wildlife.

Janice Y. Kawamura
 13515 Lindamere Lane
 San Diego, CA 92128

I128-1

I128-2

I128-3

I128-4

Response to Comment Letter I128

128 Janice Kawamura
 February 4, 2021

I128-1 Comment noted.

I128-2 Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I128-3 Comment noted.

I128-4 Traffic, including traffic safety, is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I129

From: Mark Felker <mark.r.felker@gmail.com>
Sent: Thursday, February 4, 2021 2:00 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom It May Concern;

As a resident of CMR, I am greatly concerned about several effects an additional 1200 units will have on the community.

1. Additional traffic. Currently the parking lots of Ralph's/Trader Joes and Home Depot are often filled to capacity, with those looking for parking forming lines that extend into the streets. An additional 25% population and their cars will exacerbate the situation, certainly with negative effects.

2. Safety. In case of emergency, be it fire or earthquake, streets would already be full of cars attempting to exit the area. An additional 25% population and their vehicles may prevent area residents from exiting safely. Also meaning our current fire department may not have the resources to effectively serve a larger population.

While residents may adapt to such changes, it will not be as joyful a place to live. I hope the quality of life of thousands of voters is as important a consideration as a few people making a lot of money.

Sincerely,
 Mark R Felker
 12232 Middlebrook Square
 San Diego, CA 92128

I129-1

I129-2

I129-3

I129-4

Response to Comment Letter I129

129 Mark Felker
 February 4, 2021

I129-1 Comment noted.

I129-2 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

I129-3 Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Impacts related to fire protection services and facilities were addressed in Section 5.14, Public Services and Facilities, within the Draft EIR. Impacts to fire services and facilities were determined to be less than significant.

I129-4 Comment noted.

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Comment Letter I130

From: Michelle Ye <michelle@FrontlineFundingInc.com>
Sent: Thursday, February 4, 2021 4:36 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Cc: Michelle Ye <michelle@FrontlineFundingInc.com>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch. Project Number 652519/SCH No. 2020039006

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Developing the Trails at Carmel Mountain Ranch development project to claim "affordable housing" is just a marketing scheme. We all know affordable housing in San Diego is nonexistent. Nevertheless, suppose the plan of building new housing and buildings for the Carmel Mountain community goes through. Adding extra housing density will cause infuriating and congesting traffic, construction mayhem, and a likely increase in crime that will be extremely detrimental to the Carmel Mountain community's already safe and content area. Although the idea of more housing sounds marvelous, building homes in the Carmel Mountain community is not the right approach in this specific area, and ruining the community's peace and quality of life to take this action to plan, is simply not worth it.

Homeowner,
Michelle Ye

Response to Comment Letter I130
130 Michelle Ye
February 4, 2021

I130-1

Refer to **Master Response 1** regarding density. Refer to **Master Response 3** regarding congestion. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Construction related impacts, such as air quality emissions and noise, are addressed within Section 5.3, Air Quality and Odors, and Section 5.11, Noise. Noise impacts were determined to be less than significant with mitigation incorporated. Air quality impacts were determined to be less than significant. Refer to **Master Response 4** regarding noise and **Master Response 7** regarding air quality. In addition, construction related traffic impacts are not required to be analyzed under CEQA, as transportation/circulation impacts are assessed under the significance criteria for determining vehicle miles traveled pursuant to CEQA Guidelines Section 15064.3. Refer to **Master Response 3** regarding vehicle miles traveled.

From: noreply@waltersmanagement.com <noreply@waltersmanagement.com>

Sent: Thursday, February 4, 2021 12:05 PM

To: Michelle Ye <michelle@FrontlineFundingInc.com>

Subject: Carmel Mountain Ranch Golf Course Development - Time is Running Out!

Carmel Mountain Ranch RCA

Dear Hsiao-wei Ye & Wu-yang Fu,

*****ONLY 4 MORE DAYS*****

Have you submitted your comments yet?

New Urban West's planned 1,200 units development includes affordable housing and will be approximately 60% rental units, as well as a brand new master association (not a part of our current Residential Community Association)! This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and other transient issues for our community. There are also planned public (not private) walking trails. The links below will provide you more information on this proposed development.

<http://www.cmrrca.org/index.php/golfcoursematters-generalinformation>

<https://www.10news.com/news/local-news/public-can-now-comment-on-trails-at-carmel-mountain-ranch-development-project>

Written comments on the environmental document must be received by February 8, 2021, to be included in the final document considered by the decision-making authorities. Comments can be submitted to either the following address, E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center, 1222 1st Avenue, MS 501, San Diego, CA 92101, or via e-mail to DSEAS@sanidiego.gov. Please ensure to include the project name and number in the subject line (Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

Not sure what to say in your comments? CMR United has some helpful hints:

<https://carmelmountainranch.org/ff/eir-responses-needed-tight-deadline>

- 858-495-0900 - www.waltersmanagement.com -

Carmel Mountain Ranch RCA
c/o Walters Management
9665
Chesapeake Dr Ste 300
San Diego, CA
92123-1364

858-495-0900
office
858-495-0909
fax

Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life and crime are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I131

From: Andrea Lizerbram <alizerbram@gmail.com>
Sent: Thursday, February 4, 2021 6:55 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

My name is Andrea Lizerbram and I live at 14212 Carmel Ridge Rd, San Diego, CA 92128. I am writing to tell you of my concerns regarding this development project. When we bought our house in 1999 we specifically picked our lot for the open space views of the golf course. We loved the style of this community with mostly single resident homes mixed with lots of open space. New Urban West is planning a huge development of giant buildings filling in the spaces which will loom over our homes, not single family homes which would match what we have now. Thousands of new residents in our development will cause excessive traffic getting on the 56 and 15 freeways. During rush hour it already takes me a long time to get on the 15 S to get to work. With approximately 3,000 new drivers in the area, it will really impact the traffic and commuting time. In addition, major construction in this area will cause lots of pollution, not to mention the increased wildfire danger and ability to escape during an evacuation. I am not opposed to development such as single family homes that would be more in sync with the style of this community however, this project proposed in not reasonable or appropriate.

1

Sincerely,

I131-1

Response to Comment Letter I131
131 Andrea Lizerbram
February 4, 2021

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. The study area (study intersections and roadway segments) and analysis methodology were determined in accordance with the City of San Diego Transportation Study Manual (City of San Diego 2020). All analysis was performed in accordance with requirements in the Transportation Study Manual Local Mobility Analysis guidelines. All transportation network improvements in the Local Mobility Analysis (Draft EIR Appendix C) were made in accordance with the requirements as well. Additionally, the Transportation Study Manual does not require the analysis of ramp meters in the Local Mobility Analysis. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Construction pollution related impacts are discussed in Section 5.3, Air Quality and Odors, in which the impact was determined to be less than significant. Refer to **Master Response 7**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I132

From: Dawn Nowlin <d.nowlin@sbcglobal.net>
Sent: Thursday, February 4, 2021 5:48 PM
To: DSD EAS <DSEAS@sandiego.gov>
Subject: [EXTERNAL] Appendix K: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

RE: Climate Action Plan Consistency Checklist; Appendix K of the EIR

Dear E. Shearer-Nguyen,
I cannot support the findings from the CAP consistency checklist describing The Trails development. There is significant reliance on the Transit Priority Area designation and the proposed 6.74 miles of trails system throughout the complex.
The Trails project fails Step 1A for Land Use Consistency because it is not consistent with the CMR community plan and golf course designation as AR-1. The EIR claims to meet Step 1B based on a 6.74-mile trail system and proximity to an MTS station. The TPA designation is misleading as the criteria are met technically, but not practically. The Sabre Springs/Peñasquitos Transit Station was principally designed to be a drive-to park and ride and serve the Downtown San Diego employment area and the I-15 corridor. Furthermore, MTS buses do not provide service along SR-56 for significant numbers of UCSD students and workforce at high tech hubs located in Sorrento Valley, Torrey Pines Science center, several medical centers and UTC. The MTS system and a pedestrian/bike trail system in CMR will not benefit these residents or deter a significant fraction of single occupancy vehicles.
The Sabre Springs/Peñasquitos Transit Station location is within ½-mile walking distance of proposed Units 5 and 6 representing only 23% (276 units) of the completed development of 1200 units. Unit 16 is about 2 miles walking distance from the Transit Center and 0.4 mi from Ralphs. Units 9 and 10, with a projected 500 residents, are on average 1.5 miles from the Transit Center and 1 mile to Ralphs, exceeding the ½ mile walkable goal in the City's Mobility Element.
The Trail development is trying to side step impactful and practical solutions using the Step 3 CAP Conformance Evaluation criteria #1 – 5 which repeatedly cite the 6.74 miles of pedestrian and bicycle pathways as providing access to the MTS station, shopping and reducing vehicle use. Not only is this a redundant excuse, it is misleading for several reasons: 1) the topography of the golf course is very hilly (10% grades), 2) the trail system is not ADA compliant nor easily navigable by the very young, elderly and less fit population due to topography, 3) the pathways meander through the golf course and are constrained by existing houses and present an inefficient route to access MTS and shopping as it is more direct to be on the roads & sidewalks, 4) the existing trails are too narrow to comfortably support 2-way traffic and are unsafe for simultaneous pedestrian and bicycle use, 5) the 1.85-mile pathway extension proposed is to be constructed of decomposed granite which will erode and be muddy in rains and unsafe for bicycles, 6) there are currently scant numbers of bicycle riders in CMR because it's too hilly while a count of 10 riders in an hour maximum (Ted Williams Pkwy/Pomerado Rd) is the highest posted for the general region which is in Poway and not CMR (again, because it's too hilly). These cyclists are mostly club riders and not residents, 7) shopping facilities are lacking in bicycle racks that would be a enable secure bicycle lock.
The CAP states that the trails would be completed in Phase 1-2 of the project to allow community access. This seems highly unrealistic and unsafe to allow pedestrian/bike access along the trails during construction of Phases 3 -4. This may point to how ineffectual the pathway truly meets TPA or CPA compliance.
Thank you for reading my concerns on the assessment in the CAP analysis that is inappropriately skewed to a trail system that does not consider distances to MTS, topography, practicality for walking/biking, and probability that the trail system would be utilized.
Dawn Nowlin, 20-yr CMR resident
11858 Wilmington Rd, SD

Response to Comment Letter I132

132 Dawn Nowlin
February 4, 2021

I132-1 Comment noted.

I132-2 Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use consistency. The project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan.

Mobility and transportation/circulation impacts are discussed in Section 5.2, Transportation, in the Draft EIR. Impacts associated with transportation/circulation and mobility were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation and the transit priority area designation. The comment addresses subject areas, which received analysis in the Draft EIR.

I132-3 Refer to **Response to Comment I132-2**. Refer to **Master Response 3** regarding the transit priority area designation.

I132-4 Comment noted.

I132-5 Comment noted.

I132-6 Comment noted.

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Comment Letter I133

From: Michael Abdou <michaelbabdou@gmail.com>
Sent: Thursday, February 4, 2021 7:06 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] the trail at carmel mountain ranch project no 652519/sch no2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Sir/mame

I own a home at 14060 Capewood Lane and I am very concerned about the traffic and parking if the project went through.

Please drive on Capewood lane after 5 pm and you will notice that there is no street parking as many of the residents at the apartment complex are parking on the street due to the lack of parking at the apartment complex.

It takes us almost an hour to get to Capewood lane after we take the exit at 5 pm.. Please locate the police report of Abdou's accident in 2008. I was on Ted William Parkway and Shoal creek making a left to go to my home on Capewood with my family where a car rushing home collided with us and three ambulances transported my children, wife and I to local hospitals. The traffic is horrible, please don't make the traffic worse. We need to stay safe.

I133-1

1

Michael Abdou
6193414458

Response to Comment Letter I133

133 Michael Abdou
February 4, 2021

I133-1

Traffic impacts are assessed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking.

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Comment Letter I134

From: Narasimma Meeniahswamy <mncbabu@gmail.com>
Sent: Thursday, February 4, 2021 5:27 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear Sir/Madam,

I am a resident of Carmel mountain ranch for last 12 years. I strongly oppose the subject project for the following reasons.

1. This project adversely affects the environment, it affects the fire protection and escape route.
2. This area is already highly congested for traffic.
3. This neighborhood is highly populated and affects the normal living standards. Please visit the neighborhood Costco, and Costco gas station for evidence. The shopping area at CMR is already full of people and traffic even in week days.
4. Therefore any additional expansion or development and houses adversely affect the environment , traffic and biological ecosystem.

Therefore, I kindly request the city to reject this proposal or project.

Thank you ,

Narasimma Meeniahswamy
 11948 Tivoli Park Row, unit 1 San Diego, CA 92128.

I134-1
 I134-2
 I134-3
 I134-4
 I134-5

I134-6

Response to Comment Letter I134

134 Narasimma Meeniahswamy

February 4, 2021

I134-1 The comment is an introduction to comments that follow.

I134-2 Impacts to fire protection services and facilities are addressed in Section 5.14, Public Services and Facilities, in the Draft EIR. Impacts to fire protection services were determined to be less than significant.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I134-3 Traffic impacts are assessed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I134-4 Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

- I134-5** Refer to **Response to Comment I34-3** regarding traffic. Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation.
- I134-6** Comment noted.

Comment Letter I135

To Whom It May Concern:

I reviewed of the Draft EIR of Trails of Carmel Mountain Ranch, Project No. 652519 / SCH No. 2020039006. I'm 30+ yrs. resident and a Senior citizen, I'm opposed the project because of the following issues:

- 1.0 The Draft EIR does not address in details regarding the Emergency Operations Plan during yearly Santa Ana winds. We witnessed the horrific fires in 2003, 2007, 2014 and 2016 and had many near attempts to evacuate ourselves, especially with regard to I-15 and SR-56 evacuation routes
- 2.0 The draft EIR is missing Freeway Impact Analysis during peak hours with 4 other ongoing projects that will impact traffic congestions.
- 3.0 The New Urban West proposed the construction of 1200 apartments which is not compatible to the existing CMR community. I believe 250 single family homes, 2 story would fit better into the plan for the CMR
- 4.0 The Draft EIR does not have a specific plan to preserve "a consistent focus on topographic character and landscaping", "Spectacular 18-hole golf course", "Fairway Views" for existing homeowners, especially premium views at hilltops and upper areas.
- 5.0 The Draft EIR does not provide an expansion for a library, community park, gardens, swimming pools, trails, recreation areas accessible to current residents including seniors in the CMR community
- 6.0 The Draft EIR does not address the health risk issue during construction, especially the fugitive dust from excavation which can then lead to emphysema, Valley Fever and exacerbate COVID lung problems.
- 7.0 The Draft EIR does not have time limit for construction of the project. In my opinion, phasing should be limited to a period of no more than two years of construction.

Sincerely yours,

Nga Anamosa

I135-1

I135-2

I135-3

I135-4

I135-5

I135-6

I135-7

I135-8

Response to Comment Letter I135

135 Nga Anamosa

February 1, 2021

I135-1

The City acknowledges the comment as an introduction to comments that follow.

I135-2

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I135-3

All analysis was performed in accordance with requirements in the TSM LMA guidelines. All transportation network improvements in the LMA (Draft EIR Appendix C) were made in accordance with the requirements as well. No improvements were identified for freeway ramp intersections. Vehicular queueing at freeway off-ramp intersections was evaluated in the LMA for all analysis scenarios. No ramp queues exceeded storage capacity under any analysis scenario. The City's TSM, which established study requirements for transportation analysis in the City, does not require the analysis of ramp meters in the LMA. Refer to **Master Response 3** for additional information regarding transportation/circulation.

- I135-4** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I135-5** Refer to **Master Response 2** regarding private views.
- I135-6** Public services are addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6** regarding library facilities. Refer to **Response to Comment 02-11a** regarding parks and open space. The comment addresses subject areas, which received analysis in the Draft EIR.
- I135-7** Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Section 5.3 also contains a discussion of the Health Risk Assessment prepared for the proposed project. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.
- I135-8** As noted on page 3-9 of Chapter 3 of the Draft EIR, the proposed project would be developed in phases, over an estimated four-year period.

Comment Letter I136

Dear Sir or Madam:

These Comments are submitted on behalf of myself regarding the Draft Environmental Impact Report issued on December 23, 2020, for The Trails at Carmel Mountain Ranch, Project No. 652519.

1. The Draft EIR re Sec. 5.2, Transportation (pdf p 241) and the Local Mobility Analysis (App. C) are inadequate and erroneous because they do not present or analyze the impact of increased traffic on relevant Interstate 15 and SR-56 segments.

Interstate 15 is built out in this area and there is no known upgrade planned or funded for SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical. Some of the critical segments are I-15 Northbound in the PM peak hours from Poway Road to SR-56; then from that point to Carmel Mountain Road; then from that point to Camino Del Norte; then I-15 Southbound in the AM peak hours over the same three segments from Camino Del Norte to SR-56. The segments from SR-56 Eastbound from Rancho Penasquitos Boulevard to I-15 in the PM peak hours; and SR-56 Westbound from I-15 to Rancho Penasquitos Boulevard in the AM peak hours are also critical. Appendix C, Local Mobility Analysis at pdf pages 47-70, and the entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs (7,928 of these ADTs are residential) on these critical segments, and the Draft EIR, Sec. 5.2, Transportation, is therefore inadequate and erroneous.

This omission in the Draft EIR, Sec. 5.2 Transportation, and Appendix C is also inadequate and erroneous because in fact some data was gathered and analyzed in an earlier

I136-1

I136-2

Response to Comment Letter I136

136 Alan Hahn

February 4, 2021

- I136-1** The City acknowledges the comment as an introduction to comments that follow.
- I136-2** The City's TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Refer to **Master Response 3**.

edition of the Local Mobility Analysis, but omitted in the final Local Mobility Analysis found at Appendix C. In the DRAFT Transportation Impact Analysis, The Trails at Carmel Mountain Ranch, dated January 29, 2020, Ch. 17.0, Significance of Impacts and Mitigation Measures, the following was presented in Word-type underline and strikethrough editing, indicating the text was in the October 30, 2019 version of the Transportation Impact Analysis, but was being deleted in the January 29, 2020, version.

Ch 17.0 is attached in full as Exhibit 1. Among other things the deletions include, "F" level Loss of Service Direct and Cumulative for I-15; and "F" level Loss of Service for Cumulative Impacts for I-15 and SR-56, (see Exhibit 1, par. 17.2.4 (p. 148-9) and Table 17-1, Post-Mitigation Analysis, p. 150 re TRA-4, I-15 Northbound) and p. 152, "F" level Loss of Service for two I-15 and one SR 56 segments.

"F" level Loss of Service is the lowest rated Loss of Service and generally means unacceptable. The Local Mobility Analysis and Draft EIR, are, therefore, erroneous and inadequate, by omitting this existing critical data and analysis.

2. The Draft EIR Sec. 5.19, Wildfire, is inadequate and erroneous its treatment of Fire Evacuation by not addressing Fire Evacuation Times, High Wind-Driven Flaming Ember Fires, and Omitted Analysis and Data re Evacuation Routes I-15 and SR-56.

a. **Fire Evacuation Times Ignored.** The Draft EIR's treatment of the fire evacuation issue is inadequate and erroneous because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Nowhere in the basic treatment of fire evacuation re the community itself (pdf page 603, 5.19 Wildfire; PDF pages 613-18, 5.19.3 Impacts Analysis. Issues 1-3), or considered with cumulative impacts of adjacent communities (PDF page 637, 6.1.19 Wildfire) are evacuation times even mentioned. Appendix D, Fire Fuel Load Modeling Report, is similarly deficient.

b. **High Wind-driven Flaming Ember Fires inadequately treated.** The Draft EIR does acknowledge that "Typically, the highest fire danger is produced by the high-pressure systems that occur in the Great Basin which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 mph and may exceed 50 mph during extreme conditions." The Draft EIR, however, does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. There are recent high wind-driven flaming ember fires, with mass

I136-3 Comment noted.

I136-3a Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I136-3b Wildfire hazards and evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I136-2
Cont.

I136-3

I136-3a

I136-3b

evacuations ordered, and clogged evacuation routes. This data must be presented and considered along with the additional impact of 3,180 additional residents and their vehicles.

c. **Omitted Analysis and Data re Evacuation Routes I-15 and SR-56.** It is not enough to simply state, as the Draft EIR does, that the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired (pdf page 613-4), or that “For emergency evacuation, the EOP identifies I-15 and SR-56 as emergency evacuation routes in the vicinity of the project site. Portions of the project site are located adjacent to I-15 to the east and to the northeast of SR-56. Per the VMT Analysis (Appendix G to the Draft EIR), the proposed project is anticipated to add 7,928 average daily trips to and from the project site.” (pdf p 613), without further data or analysis.

The County EOP in fact in Annex Q, Evacuation, p. 16 (an extract if Annex Q is attached as Exhibit 2), provides a formula for determining evacuation times. The recent high wind-driven flaming ember fires and CMR evacuation issues should have been studied and should have produced data available to the City and developer. Also anecdotal evidence is available from those who evacuated. The Draft EIR needs to get this data or produce it if it has not been compiled and compile anecdotal evidence, and add the additional impact of 3,180 additional residents and their vehicles to determine the true wildfire evacuation threat to the community of this massive project.

Moreover, the omission of the “F” level Loss of Service data and analysis for I-15 and SR-56 segments noted in the discussion of Paragraph 1 above re Sec. 5.2, Transportation, in the DRAFT Transportation Impact Analysis, The Trails at Carmel Mountain Ranch, dated January 29, 2020, Ch. 17.0, also further renders the Draft EIR’s treatment of the fire evacuation issue as erroneous and inadequate. If segments of the I-15 and SR-56 are “F” rated during normal rush hour traffic, how much worse will these County EOP designated *primary evacuation routes* (see attached extract of County EOP, Annex Q, p. 56) for CMR be during a high wind-driven flaming ember mass evacuation? The Draft EIR is erroneous and inadequate without these answers.

3. The Draft EIR re Sec. 5.2, Transportation (pdf p 241) and sections relating to Air Quality (Sec. 5.3), Noise (Sec. 5.11), and Safety (Sec. 5.8) , are inadequate and erroneous because they does not address Traffic and Parking at CMR’s Commercial Centers.

Traffic and parking impacts at all the commercial centers, including but not limited to the shopping areas such as the BevMo/Olive Garden shopping area, Staples/Best Buy shopping area, Angelika/Barnes and Noble/ Panera shopping area, Costco shopping area,

I136-3b
Cont.

I136-3c

I136-4

I136-4a

I136-3c Refer to **Response to Comment I136-3a** and **Master Response 5.**

I136-4 The City acknowledges the comment as an introduction to the sub-comments that follow.

I136-4a In accordance with Public Resources Code Section 21099(d), parking impacts of a residential project on an infill site within a transit priority area shall not be considered a significant impact on the environment. The project would provide adequate parking as required by San Diego Municipal Code Table 142-05C. With regard to secondary impacts and the court case cited by the commenter (*Covina Residents for Responsible Development v. City of Covina*, B279590, February 28, 2018), because the project would provide adequate on-site parking, the development will not result in any secondary effects on traffic and air quality. As a result, the cited case does not require any additional environmental review. An EIR need only address the secondary physical impacts that could be triggered by a social impact. The proposed project would provide adequate parking on the project site, as required by San Diego Municipal Code Table 142-15C. Compliance with the San Diego Municipal Code parking requirements would ensure that the proposed project would not result in a social impact associated with inadequate parking on the project site. Moreover, the project’s parking impacts cannot be considered significant per Public Resources Code Section 21099. Section 21099(d)(1) of the Public Resources Code exempts parking impacts from CEQA review for qualifying infill projects located within a

Home Depot shopping area, and Trader Joes/Ralphs shopping area, all need to be fully studied in the Draft EIR. For the Starbucks/Oggi's commercial center within the Transit Priority Area, where parking impacts in and of themselves may not have to be addressed under Cal Public Resources Code sec. 21099, even then "secondary parking impacts caused by ensuing traffic congestion ("air quality, noise, safety, or any other impact associated with transportation") must be addressed ... " *Covina Residents for Responsible Development v. City of Covina*, B279590, February 28, 2018. All the remaining commercial areas above are well outside the statutory one half mile distance from the Transit Center (sec. 21099 (a)(7)), are therefore outside the TPA, and the full traffic and parking analysis of an EIR should be applied to these areas addressing the secondary parking impacts listed in the *Covina Residents* decision, i.e., at least Air Quality (Sec. 5.3), Noise (Sec. 5.11), and Safety (Sec. 5.8).

CMR's commercial areas are not a part of Ordinance No. 21057's Transit Area Parking Overlays. Further, the developer's claim and the statements in the Draft EIR, see, e.g., pdf p 79, that "...per Ordinance Number 21057, if a portion of the project is within the TPA (i.e., holes 4, 5, and 6), the designation and associated parking reductions would apply to the entire project", is erroneous. Ordinance Number 21057 states "premises", not "project", a much narrower concept. However, even if TPA standards did apply to the entire project, as noted, CMR's commercial areas are not covered by Ordinance No. 210578 and in any event under *Covina Residents* secondary parking impacts cause by ensuing traffic congestion...must be addressed". Hence the failure to address these issues renders the Draft EIR, Sec. 5.2, as inadequate and erroneous.

4. The Draft EIR, Sec. 5.8, Health and Safety, is erroneous and inadequate because it does not address Public Health and Safety, Housing Density, and Intensity of Pandemics and Epidemics.

Despite San Diego being in the midst of the deadly Covid-19 pandemic, nowhere does the Draft EIR address the public health impacts of increasing this community's population approximately 23.9% by adding 3,180 (Draft EIR, pdf p 28) persons to the existing population of 13,287 (Draft EIR, pdf p 484). It should have been addressed at least in the Draft EIR, Section 5.8, Health and Safety, and it was erroneous and inadequate not to do so. I raised this issue in my April 8, 2020, scoping letter, but it was ignored. (Draft EIR, App A. Scoping Letter and NOP Comments (Part 2), pdf page 106). As noted there, Benjamin Dalziel, a biology and math professor at Oregon State University authored a study which that found large cities sustain seasonal flu pandemics for longer amounts of time and with a steadier rate of spread, while less dense cities see spikier rates of transmission that can strain health care systems' capacity. Urbanization and Humidity Shape the Intensity of Influenza Epidemics in U.S. Cities, Dalziel, et al., Science 362, 75-79 (2018). Data is available from

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half-mile of a major transit stop. Finally, to clarify, the transit priority area designation only applies to the project and not the commercial areas mentioned. Additionally, the commenter does not provide any evidence of secondary physical environmental impacts associated with the potential increased use of parking at commercial areas proximate to the project site. Thus, secondary parking impacts, such as those that may be associated with parking at the commercial areas around the project, are not required to be analyzed under CEQA. Parking impacts have been adequately addressed in the Draft EIR.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Noise impacts are discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation. Refer to **Master Response 4**.

Impacts related to roadway hazards are not required to be assessed within Section 5.8, Health and Safety, of the Draft EIR; rather, roadway design and safety are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation hazard impacts were determined to be less than significant.

previous flu situations and is now increasingly available from the current pandemic. The Draft EIR is both erroneous and inadequate in not including and addressing these critical public health impacts.

In summary, the above errors and inadequacies need to be addressed in an amended and re-circulated Draft EIR.

If you have any questions regarding the foregoing, please do not hesitate to contact me.

Sincerely,


Alan K. Hahn

Copy via email to:

District 5 Councilmember Marni von Wilpert; MarniVonWilpert@sanidiego.gov
District 5 Community Representative Jack Hoeprich; jhoeprich@sanidiego.gov

↑ I136-5
Cont.

I136-6
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I136-5

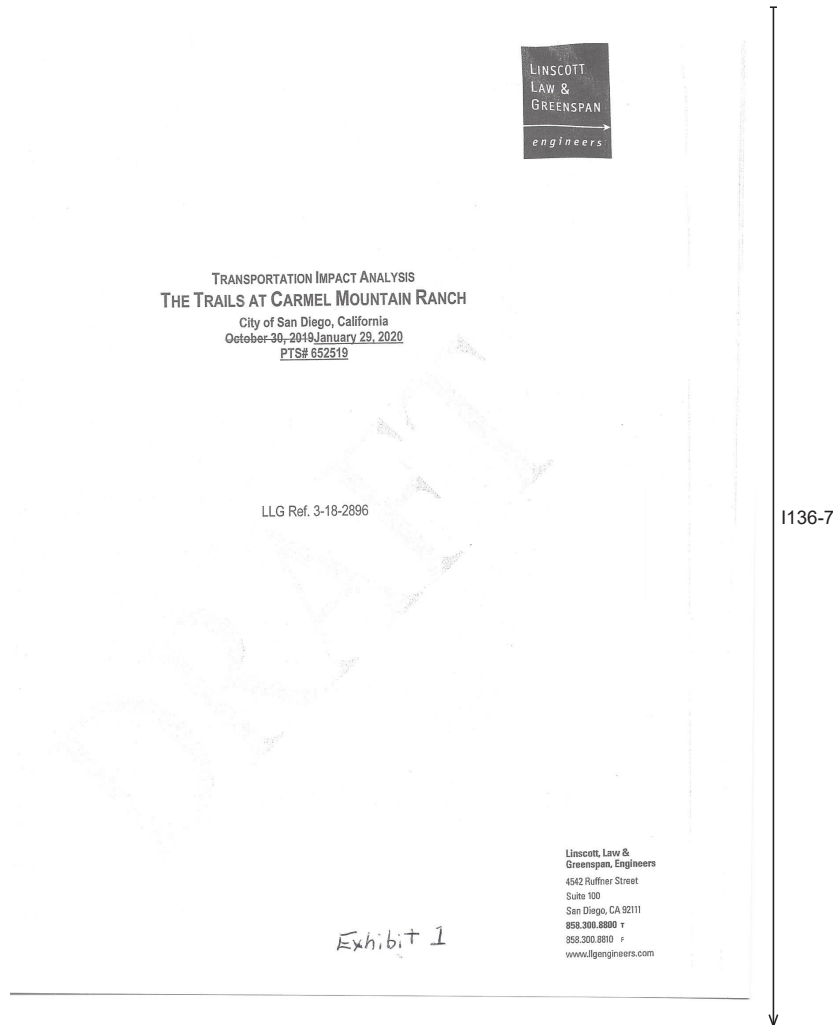
Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

Public health as it relates to individual sickness is not a topic that is required to be assessed under CEQA. Further, there is no evidence that infill development of the density proposed here will result in a longer sustained pandemic than would otherwise occur under existing conditions. Further, it is unclear what pandemic-related health impacts the comment is alleging will occur as a result of the project and CEQA forbids public agencies from speculating in an environmental document. (CEQA Guidelines Section 15145.) No revisions to the Draft EIR are required. As a result, a further response is not required.

I136-6

Comment noted.

I136-7 Comment noted.



17.0 SIGNIFICANCE OF IMPACTS AND MITIGATION MEASURES

17.1 Significance of Impacts

Per the applied significance thresholds and the analysis methodology presented in this report, the Project project and cumulative traffic are calculated to result in several significant transportation impacts. *Direct* impacts were calculated under Existing and Near-Term (Opening Year 2025) conditions where Project-added traffic results in a degradation in LOS from acceptable LOS D or better operations to below LOS D conditions or in an increase greater than the allowable thresholds for locations currently operating at LOS E or F (see *Table 5-1*). *Cumulative* impacts were calculated where Project-added traffic resulted in significant increase in intersection delay or street segment volume-to-capacity ratios over the allowable thresholds mentioned above under Horizon Year (Year 2050) conditions.

17.1.1 Intersections

Direct & Cumulative Impacts

TRA-1. Intersection #1. Carmel Mountain Road/ Rancho Carmel Drive

TRA-2. Intersection #22. Carmel Ridge Road/ Ted Williams Parkway

Cumulative Only Impacts

TRA-3. Intersection #14. Ted Williams Parkway/ Pomerado Road

17.1.2 Street Segments

None.

17.1.3 Ramp Meters

None.

17.1.4 Freeway Mainline Segments

Direct & Cumulative Impacts

TRA-4. Mainline #1. I-15 Northbound: Poway Road to SR-56/Ted Williams Parkway

Cumulative Only Impacts

TRA-5. Mainline #1. I-15 Southbound: Poway Road to SR-56/Ted Williams Parkway

TRA-6. Mainline #4. SR-56 Westbound: Rancho Peñasquitos Boulevard to I-15

TRA-7. Mainline #4. SR-56 Eastbound: Rancho Peñasquitos Boulevard to I-15

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17.2 Mitigation Measures

In order to mitigate a project's traffic impacts, the standard of practice in the City of San Diego is to require physical improvements for direct impacts and collect fair share contributions toward future improvement projects identified in a public plan or program for cumulative impacts. The Community of Carmel Mountain Ranch circulation system is built to its ultimate configuration. There is no guiding document (Public Facilities Financing Plan (PFFP), Capital Improvement Projects (CIP), or Facilities Benefit Assessment (FBA)) identifying future infrastructure projects remaining to be completed for local area streets. For cumulative impacts where there are no planned or programmed improvements, physical improvements are proposed to mitigate both directly and cumulatively impacted locations.

For Project impacts to Caltrans facilities, notably freeway mainlines, there are no physically-feasible improvements that could be constructed by a single developer. There are also no remaining improvements to be completed for I-15 that the Project could provide a contribution. For this reason, the impacts to I-15 remain significant and unmitigated. For SR-56, there are planned improvements to widen the impacted freeway segment from four to six lanes. The City of San Diego has a CIP project identified in the Torrey Highlands and Black Mountain Ranch Community PFFPs to source funding for this improvement. A portion of the funding remains unidentified and the timing for the improvements could not occur until funding is secured. The Project applicant will coordinate with Caltrans to determine the appropriate and proportional mitigation for Project impacts. Therefore, impacts to SR-56 remain significant and unmitigated.

17.2.1 Intersections

Direct & Cumulative Impacts

TRA-1. Intersection #11, Carmel Mountain Road/Rancho Carmel Drive—Carmel Mountain Road and Rancho Carmel Drive are built to their ultimate classifications per the Carmel Mountain Ranch Community Plan. With the provision of dual left turns in the east/west directions and dedicated right turn lanes where LOS E or F movements are calculated, this intersection currently operates at LOS E during the PM peak hour. The Project contributes significantly to the delay increase during this timeframe. Carmel Mountain Road serves as a through corridor for many vehicle trips to/from I-15. It also is a major destination route for various retail and employment options in the Community of Carmel Mountain Ranch resulting in variable travel patterns throughout a 24-hour period. Given these key roadway characteristics, Carmel Mountain Road is a prime candidate for Adaptive Traffic Signal Controls (ATSC). According to the Federal Highway Administration (FHWA), the key benefits of ATSC over conventional signal systems is that that it can continuously distribute green light time equitably for all traffic movements, improve travel time reliability by progressively moving vehicles through green lights, reduce congestion by creating smoother flow and prolong the effectiveness of traffic signal timing. Ideally, three (3) to four (4) intersections are needed to effectively implement ATSC. It is therefore recommended that the Project implement ATSC along Carmel Mountain Road between Rancho Carmel Drive to Conference Way (four traffic

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signals). As shown in the post-mitigation analysis provided in Section 17.3 of this report, implementation of ATSC along Carmel Mountain Road mitigates the intersection impact to below a level of significance.

TRA-2/TRA-1. Intersection #22. Carmel Ridge Road/ Ted Williams Parkway – The intersection of Carmel Ridge Road at Ted Williams Parkway is configured to provide westbound right-turn in and southbound right-turn out only movements. The southbound right-turn turn currently operates at LOS E operations due to the heavy westbound through movement along Ted Williams Parkway. Carmel Ridge Road is approximately 1,380 feet east of the Shoal Creek Drive signalized intersection and 3,200 feet west of the signalized Highland Ranch Road intersection. Given these distances meet City of San Diego design standards for signalized intersection spacing along a major roadway (1,200 feet), it is recommended the Project install a traffic signal and allow full movements in all directions. As shown in the post-mitigation analysis provided in Section 17.3 of this report, installation of a traffic signal mitigates the intersection impact to below a level of significance.

Cumulative Only Impacts

TRA-2. Intersection #1. Carmel Mountain Road/ Rancho Carmel Drive – Carmel Mountain Road and Rancho Carmel Drive are built to their ultimate classifications per the Carmel Mountain Ranch Community Plan. With the provision of dual left-turns in the east/west directions and dedicated right-turn lanes where LOS E or F movements are calculated, this intersection currently operates at LOS E during the PM peak hour. The Project contributes significantly to the delay increase during this timeframe. Carmel Mountain Road serves as a through corridor for many vehicle trips to/from I-15. It also is a major destination route for various retail and employment options in the Community of Carmel Mountain Ranch resulting in variable travel patterns throughout a 24-hour period. Given these key roadway characteristics, Carmel Mountain Road is a prime candidate for Adaptive Traffic Signal Controls (ATSC). According to the Federal Highway Administration (FHWA), the key benefits of ATSC over conventional signal systems is that that it can continuously distribute green light time equitably for all traffic movements, improve travel time reliability by progressively moving vehicles through green lights, reduce congestion by creating smoother flow and prolong the effectiveness of traffic signal timing. Ideally, three (3) to four (4) intersections are needed to effectively implement ATSC. It is therefore recommended that the Project implement ATSC along Carmel Mountain Road between Rancho Carmel Drive to Conference Way (four traffic signals). As shown in the post-mitigation analysis provided in Section 17.3 of this report, implementation of ATSC along Carmel Mountain Road mitigates the intersection impact to below a level of significance.

TRA-3. Intersection #14. Ted Williams Parkway/ Pomerado Road – Ted Williams Parkway is built to its ultimate classification per the Carmel Mountain Ranch Community Plan and City of Poway General Plan. The roadway is built to six (6) lanes with dedicated turn

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Cont.

None.

None.

Direct & Cumulative Impacts

LINSCOTT, LAW & GREENSPAN, *engineers*

Cumulative Only Impacts

TRA-5. Mainline #1. I-15 Southbound: Poway Road to SR-56 – It is recommended the applicant coordinate with Caltrans to determine proportional mitigation for Project impacts to I-15. For Project impacts to I-15, there are no physically feasible improvements that could be constructed by a single developer. There are also no remaining improvements to be completed for I-15 that the Project could provide a contribution. For this reason, the impacts to I-15 remain significant and unmitigated.

TRA-6. Mainline #4. SR-56 Westbound: Rancho Peñasquitos Boulevard to I-15 – It is recommended the applicant coordinate with Caltrans to determine proportional mitigation for Project impacts to SR-56. For Project impacts to SR-56, there are planned improvements to widen the impacted freeway segment from four to six lanes. The City of San Diego has a CIP project identified in the Torrey Highlands and Black Mountain Ranch Community PTFPs to source funding for this improvement. A portion of the funding remains unidentified and the timing for the improvements could not occur until funding is secured. Therefore, impacts to SR-56 remain significant and unmitigated.

TRA-6-TRA-7. Mainline #4. SR-56 Eastbound: I-15 to Rancho Peñasquitos Boulevard – It is recommended the applicant coordinate with Caltrans to determine proportional mitigation for Project impacts to SR-56.

Table 17-1 identifies the recommended mitigation measures.

17.3 Post-Mitigation Operations

Table 17-2-1 summarizes the pre- and post-mitigation levels of service at the intersections, street segments, and freeway mainline segments for all impacted scenarios. The mitigation proposed for direct impacts is the same for the Existing + Project and Near-Term (Opening Year 2025) With Project conditions. Therefore, the pre- and post-mitigation analysis is shown for the worst-case near-term condition. For locations also impacted in the Horizon Year (Year 2050) With Project scenario, the pre- and post-mitigation levels of service are shown under Year 2050 conditions.

The analysis worksheets of the mitigated intersections are included in *Appendix RS*.

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TABLE 17-21
POST-MITIGATION ANALYSIS

MM#	Intersection	Impact Type	Jur.	Control Type (Pre-/Post-Mitigation)	Peak Hour	Near-Term (Opening Year 2025) *						Post Mitigation			
						Pre-Mitigation Operations Without Project		Pre-Mitigation Operations With Project		Post Mitigation		Pre-Mitigation Operations Without Project		Pre-Mitigation Operations With Project	
						Delay *	LOS *	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
TRA-1.	Intersection #1: Carmel Mountain Ranch/ Rancho Carmel Drive	Direct	San Diego	Signal	AM PM	—	—	—	—	—	—	—	—	—	—
	Intersection #2: Carmel Ridge Road/ Ted Williams Parkway	Direct	San Diego	MSSC/ Signal	AM PM	67.6	E	72.7	E	59.5	E	32.4	F	32.4	F
	Freeway Mainline Segment	Impact Type	Jur.	—	—	34.9	D	65+499.1	F	22+413.7	G	—	—	—	—
TRA-4.	Mainline #1, I-15 Northbound: Poway Road to SR-567 Ted Williams Parkway ^a	Direct	Caltrans	—To be determined	—	—	—	—	—	—	—	—	—	—	—
						1,429	F	1,429	F	1,429	F	1,429	F	1,429	F
						1,429	F	1,429	F	1,429	F	1,429	F	1,429	F

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LINGGOTT, LOW & CHRISTENSEN, engineers

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MCDOT Civil Report 03-18-2006, August, Aug.

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TABLE 17-21

(Continued from Previous Page)

Horizon Year (Year 2050)											
MM#	Intersection	Impact Type	Jur.	Control Type (Pre-/Post-Mitigation)	Peak Hour	Pre-Mitigation Operations				Post Mitigation	
						Without Project	With Project	Delay	LOS	Delay	LOS
TRA-2	Intersection #1, Carnel Mountain Road/ Rancho Carmel Drive	Cumulative	San Diego	Signal	AM	64.3 446.4 89.2	65.9 443.7 92.2	F	F	41-640.8 904-729.0	D F/E
	Intersection #2, Carnel Mountain Road / Stonew Peak Drive	N/A	San Diego	Signal	AM	==	==	==	==	16.8	B
	Intersection #3, Carnel Mountain Road / Highland Ranch Road	N/A	San Diego	Signal	AM	==	==	==	==	29.7	C
	Intersection #4, Carnel Mountain Road / Conference Way	N/A	San Diego	Signal	PM	==	==	==	==	29.2	C
TRA-3	Intersection #12, Ted Williams Parkway/ Shoal Creek Drive	N/A	San Diego	Signal	AM	==	==	==	==	18.1	B
	Intersection #13, Ted Williams Parkway/ Highland Ranch Road	N/A	San Diego	Signal	PM	==	==	==	==	26.5	C
	Intersection #14, Ted Williams Parkway/ Pomerado Road 4	Cumulative	Poway	Signal	AM	73.4 56.0 68.9	E 79.860.3 73.969.6	E	FE	46-144.3 65-558.6	D E
	Intersection #22, Carnel Ridge Road/ Ted Williams Parkway	Cumulative	San Diego	MSSC/ Signal	AM	64.7 48.5	E 405.6 160.9	E	F	23-12.6	G/E
TRA-1					PM	—	—	—	—	—	—

LINSOTT, LAW & GREENSPAN, engineers

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TABLE 17-21
POST-MITIGATION ANALYSIS
(Continued on Next Page)

MM#	Freeway Mainline Segment	Impact Type	Jur.	—	Pre-Mitigation Operations						Post Mitigation
					Without Project		With Project				
					V/C *	LOS	V/C	LOS	V/C	LOS	
TRA-4	Mainline #1. SR-56 Southbound: Poway Road Penasquitos Parkway	Cumulative	Caltrans	—To be determined	1.499 1.581	F	1.259 1.262	F	—	N/A	—N/A
TRA-5	Mainline #1 I-15 Southbound: Poway Road to SR-56 ^d	Cumulative	Caltrans	—To be determined	1.463 1.548	F	1.174 1.439	F	—	N/A	—N/A
TRA-6	Mainline #4 SR-56 Westbound: Rancho Penasquitos Boulevard to I-15 ^d	Cumulative	Caltrans	—To be determined	1.017 1.049	F	1.022 1.032	F	—	0.664 0.691	—
TRA-7	Mainline #4 SR-56 Eastbound: Rancho Penasquitos Boulevard to I-15 ^d	Cumulative	Caltrans	—To be determined	0.969 0.971	F	0.977 0.990	F	—	0.664 0.660	—

Notes:

Footnotes:

- Legend:**
- Average delay expressed in second per vehicle.
 - Level of service.
 - For locations where impacts occur as an Existing condition.
 - The City of San Diego is without jurisdiction to consider significant and unmitigated impacts to resources.
 - The City of San Diego is without jurisdiction to consider impacts to resources.
- General Notes:**
- MM# = Mitigation measure number.
 - Sig = Significant impact post-mitigation?
 - Mitigation provided for locations currently operating at Level of Service D.
 - Jur = Jurisdiction.
 - Control Type: "MSCT" = Signal*, etc. indicates project control type.

General Notes:

1. MM# = Mitigation measure number.
2. Sig = Significant impact post-mitigation?
3. Mitigation provided for locations currently
4. Jur. = Jurisdiction
5. Control Type: "MSSC"/"Signal", etc. indicate

old.

5. Control Type: "MSSC"/"Signal", etc. indicates pre- and post-mitigation control type.

LINSCOTT, LAW & GREENSPAN, engineers

152

LLG Ref. 3-18-2896
The Trails at Carmel Mountain Ranch
N:\23406\Text\Report\2nd Submittal\2896_Report.docx

1136-7
Cont.

I136-8 Comment noted.

ANNEX Q Evacuation



1136-8

ACKNOWLEDGEMENTS

Staff and Principal Planners

Sheriff's Emergency
Planning Detail Team

Julie Jeakle
Senior Emergency Services Coordinator
Office of Emergency Services

Cory Osth
Emergency Services Coordinator
Office of Emergency Services

San Diego County Access and Functional Needs
Work Group

Operational Area Emergency Operations Plan

SEPTEMBER 2018

Unified San Diego County Emergency Services Organization And County Of San Diego

Exhibit 2, p. 1 of 3

RESPONSE ACTIVITY	LEAD AGENCIES	SUPPORTING AGENCIES
Other Response Operations		
Direct other response actions (fatality management, shelter-in-place, HAZMAT Response)	OA EOC <ul style="list-style-type: none"> • Law Branch (Medical Examiner) • Fire and Health Branch (Hazmat) 	
Secure affected area and limit access. Access or reentry to an area or roadway that has been closed or under evacuation, may only be granted by the incident commander or designee on a case-by-case basis.	SDDSD Local law enforcement agencies	Local EOCs
Maintain records and documentation of response operations	OA EOC <ul style="list-style-type: none"> • Documentation Unit 	All responders Local EOCs
Coordinate, request, track, and demobilize resources	OA EOC	Local EOCs
Provide animal care and assist as appropriate with evacuation of animals	Department of Animal Services	San Diego Humane Society
DETERMINATION OF EVACUATION TIMES The length of time it will take for an area to evacuate can be determined by dividing the number of vehicles that need to evacuate by the total roadway capacity. The formula is provided below: $Evacuation\ Time = \frac{\left(\frac{Evacuation\ Population}{Average\ Vehicle\ Occupancy} \right)}{Roadway\ Capacity}$		
EVACUATION STRATEGIES There are many strategies available that can be implemented during an evacuation effort to enhance traffic flow and reduce the overall evacuation time. These strategies include contra-flow, traffic signal coordination, closure of off and on-ramps, Intelligent Transportation Systems, segregation of pedestrian and vehicle traffic, exclusive bus routes, phased evacuation, phased release of parking facilities, use of designated markings, road barriers, and use of the San Diego Freeway Patrol Service.		
<div>Annex Q Evacuation</div> <div>p. 2 of 3</div> <div>16</div>		

I136-8
Cont.

ATTACHMENT 2 – EVACUATION ROUTES

EVACUATION ROUTES

Primary evacuation routes consist of the major interstates, highways, and prime arterials within San Diego County. Local jurisdictions will work with the OAEOC, San Diego Sheriff's Department, Caltrans, CHP, Department of Public Works, and other applicable agencies/departments to identify evacuation points and transportation routes.

Interstate 5	Route 54	Route 78
Interstate 8	Route 56	Route 94
Interstate 15	Route 67	Route 125
Interstate 805	Route 75	Route 163
Route 52	Route 76	Route 905

The following major interstates and highways within San Diego County were identified as the primary transportation routes for an evacuation effort:

EVACUATION ROUTE DETERMINATION

It will be necessary to identify evacuation points before evacuation routes are announced to the public. Evacuation routes will be determined based on the location and extent of the incident and will include as many pre-designated transportation routes as possible. Important roadway characteristics and factors that should be considered when selecting an evacuation route include:

- Shortest route to the designated destination areas
- Maximum capacity
- Ability to increase capacity and traffic flow using traffic control strategies.
- Maximum number of lanes that provide continuous flow through the evacuation area.
- Availability of infrastructure to disseminate real-time conditions and messages to evacuees en-route, such as Changeable Message Signs.
- Minimal number of potentially hazardous points and bottlenecks, such as bridges, tunnels, lane reductions, etc.

Traffic conditions must be monitored along evacuation routes and operational adjustments should be made as necessary to maximize throughput. These adjustments may include the identification of alternative evacuation routes.

ROADWAY CAPACITY

Roadway capacity represents the maximum number of vehicles that can reasonably be accommodated on an evacuation route. Roadway capacity is measured in vehicles per hour. Roadway capacities can fluctuate based on the number of available lanes, number of traffic signals, construction activity, accidents, and obstructions. Each roadway classification has a different capacity, with freeways and highways having the highest capacities. Based on

I136-8
Cont.

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Comment Letter I137

From: Jayesh Shridhar <jayeshshridhar@gmail.com>
Sent: Tuesday, February 2, 2021 4:42 PM
To: DSD EAS <DSDEAS@sanidgo.gov>
Cc: Shilpa C.H <shilpa.ch@gmail.com>
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear City Council:

We strongly oppose the proposed Trails at Carmel Mountain Ranch Project (heretofore the Project) in its current form. The Project violates the many provisions of the California Environmental Quality Act (CEQA). The Project destroys the community character of Carmel Mountain Ranch and presents a number of unmitigable environmental impacts.

1

I137-1

Response to Comment Letter I137

**137 Shilpa Hiremath Chandrashekhar and Jayesh Shridhar
February 3, 2021**

I137-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

Considerable environmental damage will result from this project. Additionally, the EIR is deficient in many respect. The Project will result in the destruction of community character, loss the open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigatable environmental impacts.

I137-1
Cont.

Destruction of Community Character

Without a doubt the Project does great harm to the community character of Carmel Mountain Ranch. First, residents of Carmel Mountain Ranch purchased their homes under the assumption that open space and green space would be a prominent feature of their community. They had good reason to believe that green space would characterize the community since, the project site is designated Park, Open Space, and Recreation in the General Plan."

I137-2

Loss of Open Space and Park Land

The EIR suggests the Project will expand designated park land. The greatest amount of open space would be provided by the "no project alternative" in the EIR.

I137-3

Increased Wildfire Risk

Building in very high fire severity zones is so dangerous that numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature.

Building in very high fire severity zones is dangerous for three reasons:

1. Additional residences increases the risk of human generated fire from normal human activities (vehicles, power equipment, barbeques, etc.). 2. Building in a high fire zone increases the impacts on people and property when a fire occurs.

3. Evacuation from a high fire severity zone is exacerbated by increased development (see the next section dealing with evacuation).

I137-4

Increased Evacuation Risk

Evacuation from Carmel Mountain Ranch in the event of a wildfire will be extremely difficult and the proposed 1200 homes and 3500+ residents exacerbate an already dangerous situation. Most wildfires come the east during wind-driven Santa Ana conditions. Although large thoroughfares and freeways do exist in the area (Routes 15 and 56, Ted Williams Parkway and Pomarado road) these exits will be swamped by residents fleeing other large communities to the north and east including Poway, Rancho Bernardo, Ramona, Escondido and others.

I137-5

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Finally, refer to **Master Response 10** regarding alternatives. Refer to **Response to Comment O2-11a** regarding parks and open space. The comment addresses subject areas, which were analyzed in the Draft EIR.

I137-2 Refer to **Response to Comment I137-1**.

I137-3 Refer to **Response to Comment O2-11a** regarding parks and open space.

I137-4 Refer to **Response to Comment I137-1**.

I137-5 Refer to **Response to Comment I137-1**.

<p>Everyday traffic can create jams and stoppages. The city of Poway conducted a study of the area just east of Carmel Mountain Ranch and concluded:</p> <p>Creates more Sprawl Housing</p> <p>This Project is not really infill. Although located with the City of San Diego, Carmel Mountain Ranch is suburban development. Infill not appropriate for the suburban periphery of San Diego. The EIR states: "the proposed project would introduce a population beyond what is planned for the project site." The 1200 proposed homes is excessive resulting in reduced quality community character, crowding, high Vehicles miles travelled (VMT; see Climate Change section below). Sierra Club San Diego would support a project of approximately 200 hundred homes that are a mix of single family homes, multi family multi family homes, and rentals.</p> <p>The EIR states: "The site is primarily characterized by developed land/disturbed habitat (comprised of graded and previously maintained areas of the golf course as well as ornamental plantings and landscaping associated with the golf course use) and some native habitat (upland and wetland species)." Open space should not be converted to suburban sprawl development within the city of San Diego or elsewhere. This is one of the largest sprawl developments in the past several decades in San Diego and should require great scrutiny.</p> <p>Massive Increase in Greenhouse Gas</p> <p>The huge amount of greenhouse gas (GHG) released from this project exceeds any GHG goals of the Climate Action Plans of the City of San Diego and State of California. The project will result in a massive increase in GHG even after some minor mitigations on the City of San Diego checklist are implemented. This project does not take us closer to the 1990 GHG levels, the goal of the City's Climate Action Plan; it would not even come close to maintaining GHG at 2021 GHG levels.</p> <p>Reduced Air Quality</p> <p>GHG that promotes climate change will result from this project but so will polluted air. The project also represents a major increase in air pollution and related health effects.</p> <p>Unlike many construction projects the Project is surrounded by and immediately proximate to thousands of homes. A large construction project within an existing neighborhood would produce abundant air pollution and dust.</p> <p>Despite mitigation measures, fugitive dust from grading, hauling, conveying, and loading will occur. Fugitive dust is carcinogenic and is implicated in a host of respiratory problems including COPD, asthma, emphysema, lung cancer and premature death. Dust pollution would blow westward with the prevailing winds and pollute several communities of San Diego and</p>	<p>↑ I137-5 Cont.</p> <p>I137-6</p> <p>I137-7</p> <p>I137-8</p> <p>I137-9</p>	<p>I137-6 Refer to Response to Comment I137-1.</p> <p>I137-7 Refer to Response to Comment 02-11a regarding parks and open space.</p> <p>I137-8 Refer to Response to Comment I137-1.</p> <p>I137-9 Refer to Response to Comment I137-1.</p>
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the City of Poway. During Santa Ana winds dust would blow into Rancho Penasquitos and number of other San Diego communities,

Transportation and Traffic
The Project produces a large increase in traffic in North County San Diego and the EIR concludes that transportation impacts are **unmitigatable**. This is despite the fact that “Portions of the Project site are located within a Transit Priority Area (TPA) due to proximity to the Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit Station approximately 0.5 miles south of the Project Site.” Traffic is often stopped on area roads and Freeways, and this compounds an already serious problem.

Conclusion
The project should not be allowed to make statements of overriding consideration. Instead it should mitigate these deficiencies that the EIR concludes are unmitigatable.

We believe that a substantially downsized project (by 75%) or the no project alternative should be approved. As noted above the EIR is deficient in many respects and needs to be rewritten and recirculated.

↑ I137-9
| Cont.

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| I137-10

|
| I137-11
|

- I137-10 Refer to **Response to Comment I137-1**.
- I137-11 Comment noted.

Respectfully,
Shilpa Hiremath Chandrashekhar and Jayesh Shridhar
Carmel Ridge Road
92128

Comment Letter I138

February 3, 2021

E. Shearer-Nguyen, Environmental Planner
Development Services Dept
101 Ash Street
San Diego, CA 92101

Re: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

Dear Ms. Shearer-Nguyen:

I would like to thank you and the rest of the Development Services Department staff for having to tackle such a large project. I have been told the proposed 1200 unit Trails at Carmel Mountain Ranch would be the biggest infill project in San Diego in the last 10 years. I have reviewed a good portion of the EIR and there are some issues and concerns that I would like to bring to your attention.

The first two are health and safety issues that I'm not sure are addressed in the EIR and the 3rd all fall under Project Objectives or compliance with the General Plan/Community Plans.

1) Under Section 5.8 Health and Safety

It appears that public safety issues associated with the 5 pedestrian tunnels were not evaluated by the EIR.

The developer wants to use the former golf cart tunnels for pedestrian tunnels. These tunnels were used multiple times a day by golf course maintenance personnel and course patrons using golf carts. There was a nightly drive thru of the course before closing. There won't be any supervision of the tunnels if the Trails project is approved yet pedestrians will be encouraged to use them.

This is really going to become a nuisance for the community as far as lack of maintenance, trash accumulation and graffiti. My main concern is from a public safety standpoint where people will be walking through these tunnels and will be out of public view for quite a period of time. Many are over 100 ft long as they go under 4 and 6-lane Parkways. People could be harassed, robbed, or even physically or sexually assaulted in these areas.

Here's some articles I found in regards to crime in pedestrian tunnels. Some municipalities are considering filling in their pedestrian tunnels:

This is from Canada: <https://globalnews.ca/news/6560361/pedestrian-underpasses-saskatoon-police-commission/>

This is from the UK. Anti-social behavior is considered littering, graffiti, drinking or drug use, loitering and crime

Response to Comment Letter I138

138 Karen Vogue

February 3, 2021

I138-1 The City acknowledges the comment as an introduction to comments that follow.

I138-2 Refer to **Response to Comment 02-7** regarding public safety. Public services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities (specifically related to police services) were determined to be less than significant. Specific to the issue of the pedestrian tunnels, the analysis for General Plan Policy UD-A.13 included in Draft EIR Table 5.1-2 explained that, the project would incorporate safety lighting throughout the project site for security purposes. Public spaces (i.e., privately owned recreation amenities with a Recreation Easement recorded over them) would also be clearly marked and would be open for public use during designated hours. However, pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours.

I138-3 The new Master HOA would be responsible for maintaining the trails and tunnels. Refer to **Response to Comment I138-2**.

I138-4 Refer to **Response to Comment I138-2**.

<https://www.shropshirelive.com/news/2019/01/07/two-telford-underpasses-to-be-filled-in-as-part-of-community-improvements/>

The entity responsible for these tunnels could be open to lawsuits as it could be seen they are encouraging the public to use facilities that are potentially dangerous. To mitigate the danger to the public, these tunnels could easily be in filled with excavation dirt and then replanted. The sidewalks/trails can then be redirected to the traffic light controlled pedestrian crossings.

2) Section 5.8 Health & Safety

5.8.1 Physical Conditions: pgs 403-405 of the EIR

It seems the EIR only partially addressed the soil contamination exposure on the golf course. The former golf course used various chemicals on the property for 36 years. From Appendix L, Stantec made several recommendations from their April 2018 survey, but no tests have been noted that I could see. Were soil tests done at the maintenance area, clubhouse or spot checked at each fairway?

Here's a listing of some exposures mentioned in the EIR and Appendix L
Appendix L pg 30

"Stantec recommends collecting soil vapor samples in the vicinity of the former UST location to evaluate the potential for residual vapor concentrations associated with the former UST that could represent an environmental concern to the Property"

Appendix L pg 30

"prior to redevelopment the grease trap will need to be properly removed per regulatory requirements. The clarifier is identified as an REC to the Site due to the potential that oils and solvents could have been released into this structure"
(Recognized Environmental Condition)

Section 5.8 of the EIR does not address either of these issues at the clubhouse area. The status of the soil around the UST and the clarifier are unknown and as a result no mitigation measures were formulated.

The maintenance area is not slotted for development, but due to the heavy use of chemicals, Stantec suggests an assessment. There are multiple ASTs: 1000 gal fertilizer tank, two 500 gallon petroleum product tanks, 100 gallon hydraulic fluid tank and 100 gallon oil tank in addition to a storage shed containing pesticides. See page 30 of Appendix L. Staining was noted around the hydraulic lift and Stantec recommended a subsurface investigation.

Section 5.8 of the EIR does not discuss this. Have soil tests around the maintenance area and the recommended subsurface investigation been done? The operation has been closed for 2 ½ years and no mention has been made as to the status of these ASTs and the chemicals in them. This seems an oversight in the EIR.

↑ I138-4
Cont.

I138-5

I138-6

I138-7

I138-8

I138-9

I138-5

Comment noted.

I138-6

The comment pertains to soil contamination within the project site. Potential contamination was addressed in Section 5.8, Health and Safety, of the Draft EIR. Refer to **Response to Comment 02-41** regarding soil sampling. The Master HOA will be responsible for ongoing maintenance of all open space which would include trash removal and any graffiti abatement.

I138-7

The comment restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA. Therefore, no further response is required.

I138-8

Potential impacts related to the potential disturbance and removal of contamination related to the underground storage tank and clarifier on site are discussed in Section 5.8, Health and Safety, of the Draft EIR. The Draft EIR determined that potential hazards would be less than significant with compliance with applicable regulatory requirements and documents. Refer to **Response to Comment 02-41** regarding soil sampling. The Master HOA will be responsible for ongoing maintenance of all open space which would include trash removal and any graffiti abatement.

I138-9

Refer to Section 5.8, Health and Safety, of the Draft EIR and **Response to Comments I138-6, I138-8 and 02-41.**

Pg 405 of the EIR

Recognized Environmental Condition (REC) . “The ongoing pesticide application on the site leading to accumulated residual pesticides in soils would be considered a REC.”

Appendix L pg 34:

Stantec's Finding and Opinion #6:

"During the site visit, Stantec identified the presence of a chemical storage shed located east of the maintenance building containing **pesticide products used throughout the Property.**

Organochlorine pesticides and their drying agents are known to accumulate in shallow soils where the products are applied. Therefore, the presence of the pesticides represents a REC to the Property."

The EIR did not mention soil testing of each fairway. Was each fairway spot checked for chemical residue in the soil? If these chemicals are present, they will become airborne during excavation and grading. I didn't see reference to this possibility in the Air Quality Section (although it was too technical for me in many respects).

I don't believe the EIR has fully addressed these conditions. This soil contamination and the possibility of these becoming airborne is a great concern to me.

3) My other issue with this project is that the design and density don't comply with many aspects of the General Plan, City of Villages and our Community Plan. In a nutshell the housing types, design and density are not compatible, cohesive nor respectful of our community.

ES 3 Project Objectives pg 24

ES 3 Objective #1: Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

The project does not meet this objective. It is not compatible with the adjacent established community because it proposes 100% multi family buildings at heights of 37' and 48' with minimum building setbacks at 50ft from the property lines of existing 2 story homes.

Fifty feet sounds reasonable, but there is only a guaranteed 15-foot landscaped buffer and "Circulation elements such as drive aisles, driveways, parking areas, paths and trails may encroach into the buffer area for a maximum 35% of the gross buffer lot area of each unit". (See page 9 of the Design Guidelines for building heights and page 14 for Transition, Buffers, etc). They aren't offering any 2 story or single family structures.

This does not comply with the Carmel Mountain Ranch Community Plan:
https://www.sandiego.gov/sites/default/files/carmelmountainfinal_0.pdf.

I138-10 Comment noted.

I138-11 Refer to **Response to Comment I138-6**. In addition, refer to **Master Response 7** regarding fugitive dust and air quality impacts. Impacts related to air quality were determined to be less than significant and the topic has been adequately addressed in the Draft EIR within Section 5.3, Air Quality and Odor.

I138-12 Comment noted.

I138-13 Refer to **Master Response 1**, as well as Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Additionally, potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding community character. The comment addresses subject areas, which received analysis in the Draft EIR.

- I138-14** In regard to housing types, a variety of building types (townhomes, garden walk-ups, stacked flats and apartments, among others) would be provided in the community, with a mix of for-sale and rental product to serve a diverse and mixed population and household size. A variety of architectural styles would be allowed across the neighborhoods, so long as a consistency is established at each planning unit neighborhood to help define a sense of place. Therefore, the project would provide a variety of housing types, and therefore meets Project Objective 1.
- I138-15** Comment noted.
- I138-16** Refer to **Response to Comment I138-13**.

Page 83 of the Carmel Mountain Ranch Community Plan under Design Compatibility, paragraph 1, "the choice of building Heights will be geared to the silhouette of the terrain: higher buildings are planned on lower ground particularly within the Town Center area". The Trails proposes development at the higher elevations and amongst existing 2 story single family homes.

Please see Figure 27 on page 84 of the Community Plan where apartment buildings are placed at lower elevations so as not to tower over single family homes. The apartments in Carmel Mountain Ranch are also built on the outer edges of the community, not in between rows of single family homes. Please see Google Maps for Carmel Terrace, Carmel Summit and Carmel Landing apartments: Google Maps satellite view of Carmel Ridge Road [14050 Carmel Ridge Rd - Google Maps](#)

ES 3 Project Objective #7

"Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure that the project is cohesive and respectful of existing properties."

The Trails at Carmel Mountain does not meet this objective. It is not cohesive nor respectful of existing properties

- The project is not cohesive in that it infills former golf fairways spread throughout the Carmel Mountain Ranch Community - 1400+ acres. Please see Figure 4 of the Design Guidelines. It would be 11 mini developments of 3-4 story multi family buildings surrounded by the existing 2 story single family homes.
- It is not cohesive in that the density and type of housing will **stand out** instead of **blending in** with the community.(please see the response to Objective #1)
- The project is not respectful of existing properties as it is 100% multi-unit buildings, all three and four stories tall, and there is only a minimum 15' landscape buffer with driveways and parking allowed just outside of the 15' buffer. Please see page 9 of the Design Guidelines for density and heights of the proposed buildings and page 14, Transitions, Buffers, Edges and Screening for buffers and circulation elements.

5.1 – Land Use

Pg 112 Land Use and Community Planning Element: "According to Figure LU-1 of the Land Use and Community Planning Element, **the project site itself has low Village Propensity**, however the area immediately to the north (residential and Carmel Mountain Plaza) is considered to have higher Village Propensity."

Pg 126 Table 5.1-2. Project's Consistency with City of San Diego's General Plan

The EIR is in error. The project is not consistent with the City of Villages Strategy or several sections of the General Plan.

I138-16
Cont.

I138-17

I138-18

I138-19

I138-20

I138-21

I138-17 Comment noted.

I138-18 The project is compatible with the community as explained in **Response to Comment I138-13**. Refer to **Master Response 1**, as well as Tables 5.1-2 and 5.1-3 of the Draft EIR, for further discussion regarding General Plan and Community Plan consistency. Thus, the project would meet Project Objective 7.

I138-19 Refer to **Response to Comment I138-13**.

I138-20 Comment noted.

I138-21 Refer to **Response to Comments I138-13**.

Per the EIR, "A. **City of Villages Strategy**. "Mixed-use villages located throughout the City and connected by high-quality transit. "

The EIR omitted the terms "compact, mixed use, and walkable villages".

Page SF-3 City of Villages Strategy, Transportation and Land Use Planning actually reads,

"The strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and walkable villages that are connected to a regional transit system."

Pg ME-6 of the Mobility Element of the General Plan under goals:

A. Walkable Communities Goals ♦ A city where walking is a viable travel choice, particularly for trips of less than one-half mile.

Table 5.1.2 is incorrect The Trails project does not meet these guidelines.

It also is not consistent with

Pg 130 LU-A.10

"Design infill projects along transit corridors to enhance or maintain a "Main Street" character"

Carmel Mountain Ranch is not a compact, walkable community. It encompasses 1400+ acres with elevations from 530-802'. The Transit Center was added to the southwest corner of Carmel Mountain Ranch in 2014 and is 1.4 miles away from the community Town Center.

The Trails project wishes to infill the former golf course, whose fairways are spread throughout the community. They are not creating any "villages" or enhancing a "main street" character". This would be 11 mini developments within an existing community whose scale and density do not match adjacent 2 story homes.

Only a small portion of the proposed development is within a half-mile of the Transit Center. Unit 16 is about 2 miles walking distance from the Transit Center and 0.4 mi from Ralphs. Units 9 and 10, with a projected 500 units, are on average 1.5 miles from the Transit Center and 1 mile to Ralphs, exceeding the ½ mile walkable goal in the City's Mobility Element. (using the clubhouse, 14050 Carmel Ridge Rd and 12001 Ferncrest for averages). It is a 1.4 mile walk with a 272' incline from the Transit Center to the clubhouse at 14050 Carmel Ridge Rd.

Pg 159 Urban Design Element

A. General Urban Design Goals

Policy UD-A.1 "a. Protect the integrity of Community Plan designated Open Spaces.

The project is not consistent with this policy.

Carmel Mountain Ranch was designed with the golf course land counting as part of the community's Open Space and per the Community Plan, "as a physical and visual

I138-21
Cont.

I138-22

I138-23

I138-24

I138-25

I138-22 Comment noted.

I138-23 Comment noted.

I138-24 Comment noted.

I138-25 Refer to **Response to Comments I138-13.**

amenity that will link the natural and physical features of the community into a coherent whole". See pg 33 and 36 of our Community Plan https://www.sandiego.gov/sites/default/files/carmelmountainfinal_0.pdf

The former golf course property is also designated Open Space by the city's General Plan. Please see Figure 1.2 pg 67 and page 5.7-16 of the EIR

The Trails project does not meet this policy as it is infilling our General Plan designated Open Space that was built as an integral component of our community. They are taking away over 50 acres of open space.

Policy UD-A.2 "Use open space and landscape to define and link communities." The project fails to meet this policy.

The Trails at CMR takes away the very concept that Carmel Mountain Ranch was built upon, using open space of the golf course to define and link the community. Please refer to pg 33 of our Community Plan.

Pg 164 Policy UD-A.5 b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character

The project fails to meet this policy.

The Trails at CMR project is not sensitive to the scale, form, rhythm or character of our well-established community. Please see responses to Objectives #1 and #7. It wishes to insert 1200 units in the middle of our community with no sensitivity to the character of our community.

As proposed, The Trails at Carmel Mountain Ranch is not compatible, coherent nor respectful of the existing community. The density will create Significant and Unavoidable Impacts that will require the City Council to write a Statement of Overriding Considerations for Transportation/Circulation, Public Services (Libraries) and Population and Housing. There are safety issues with the tunnels and soil contamination throughout the fairways that have not been properly addressed by the EIR. I respectfully ask these issues be addressed and a meaningful alternative be required.

Sincerely,

Karen Vogue
14788 Carmel Ridge Rd

I138-25
Cont.

I138-26

I138-27

I138-28

I138-29

I138-30

I138-26 Refer to **Response to Comment 02-11a** regarding open space.

I138-27 Refer to **Response to Comments I138-13.**

I138-28 Refer to **Response to Comments I138-13.**

I138-29 Refer to **Response to Comments I138-13.**

I138-30 Comment noted.

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Comment Letter I139

From: cstephens@aeedm.com <cstephens@aeedm.com>
Sent: Sunday, February 7, 2021 2:00 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] CMR / Comment

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom It May Concern:


I would like to comment on the following project -
☐ Project Name: Trails at Carmel Mountain Ranch
☐ Project No. 652519 / SCH No. 2020039006
☐ Community Plan Area: Carmel Mountain Ranch
☐ Council District: 5

I value a strong productive and safe community and I'm finding myself having concerns about the proposed project for CMR. Currently there is a development project under way just on the other side of I15 and another south of us, in Sabre Springs.

Water, traffic, education and safety are major factors to consider in our community. Southern California is constantly being told it's in a drought and we must constantly conserve water. How can we offer new developments what is already at a minimum or not available at all. Already there is a high density of traffic in this area, which has taken a toll on our streets, with so many of them in need of immediate repair. Why would we consider so much additional growth in CMR, in consideration of these two factors alone.

Should something be done with the vacant golf course, of course. Growth yes, but at a minimum. Please consider the massive growth already going on around the CMR area and keep CMR's growth to a minimum, reducing the projected plan would be a good start.

Thank you for your time,
Carol Sutton

 This email has been checked for viruses by AVG antivirus software.
www.avg.com

Response to Comment Letter I139
139 Carol Sutton
February 7, 2021

I139-1 The City acknowledges the comment as an introduction to comments that follow.

I139-2 Water quality and hydrologic impacts are analyzed within Section 5.10, Hydrology and 5.18, Water Quality, of the Draft EIR. The Draft EIR concluded that the project would result in less than significant hydrology and water quality impacts.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Impacts to public health and safety are addressed in Section 5.8, Health and Safety, of the Draft EIR. The analysis concluded that the project would result in less than significant public health and safety impacts. Additionally, refer to **Response to Comment O2-7** regarding public safety.

Transportation/circulation impacts are analyzed in Section 5.2 of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

I139-1

I139-2

I139-3

- I139-3** Cumulative impacts are assessed in Chapter 6, Cumulative Effects, of the Draft EIR. Table 6-1 provides a list of cumulative projects that were included in the analysis. Refer to this section of the Draft EIR for a complete discussion of the cumulative impacts associated with the project.

Comment Letter I140

Response to Comment Letter I140
140 Marilyn Terrian
February 7, 2021

-----Original Message-----

From: marilynt584@gmail.com <marilynt584@gmail.com>
Sent: Sunday, February 7, 2021 2:50 PM
To: DSD EAS <DSEAS@sanidiego.gov>
Subject: [EXTERNAL] The Trails at Carmel Mtn. Ranch

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I am strongly against the above project by New Urban West for several reasons. This endeavor would cause so much congestion of cars and parking problems and people in rentals so often don't keep up their places. We now have residents that have been here twenty some years and have stable neighborhoods. This project is bad news and I hope and pray that it gets rejected.

Thanking you in advance for your consideration on this matter.

Marilyn Terrian (Resident of CMR)

Sent from my iPad

I140-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3** regarding transportation/circulation and parking.

I140-1

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Comment Letter I141

Response to Comment Letter I141
141 Nancy Taerzsch
February 8, 2021

-----Original Message-----

From: nancy taerzsch <taerzsch92128@gmail.com>
Sent: Sunday, February 7, 2021 2:53 PM
To: DSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] CMR

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My biggest concern is the increased volume including cars, people, etc. Our parking areas at shopping sites are already at capacity at certain times of the day. Classrooms are already overcrowded. We cannot increase the number of homes without addressing the problems that it will create.

Sent from my iPhone

I I141-1
I I141-2

- I141-1** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3** regarding transportation/circulation and parking.
- I141-2** Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

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Comment Letter I142

From: Pamela Lacher <pamela.lacher@gmail.com>
Sent: Sunday, February 7, 2021 2:12 PM
To: DSD EAS <DSEAS@sanidiego.gov>; Troy@wealthanalytics.com
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

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I do not agree that this project is a good idea, for several reasons:

1.
 I can appreciate "affordable housing". I am a defense attorney and represent many clients who qualify or have affordable housing. The issue is having those individuals living near me is different from representing them in their criminal activity, including drugs, theft and other crimes. I live in this community because it is not only relatively safe, but people here work hard to be able to afford to live here. Affordable housing will devalue the properties around that housing—and as I understand this project, the community in this housing won't even have to abide by the same/our rules.

2.
 The morning traffic to get to work (excluding Covid) is already an issue. I used to live further north and the commute was awful—adding 1200 more units and however many additional people will increase my commute substantially.

3.
 Having public trails, will add more people around and increase the possibility of more crime.

Thanks for the opportunity to voice my opinion.

I142-1

I142-2

I142-3

Response to Comment Letter I142

142 Pamela Lacher

February 7, 2021

I142-1 Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. The provision of affordable housing, crime, and property values are not physical changes to the environment.

I142-2 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**.

I142-3 Refer to **Response to Comment O2-7** regarding public safety.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment.

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Comment Letter I143

From: shelly <sillyme1227@yahoo.com>
Sent: Sunday, February 7, 2021 1:31 PM
To: OSD EAS <DSDEAS@sanidiego.gov>
Subject: [EXTERNAL] Objection to The Trails at Carmel Mountain Ranch

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Project Name -- The Trails at Carmel Mountain Ranch,
Project Number 652519/SCH No. 2020039006

To whom it may concern,

I am writing in strong opposition to the proposed Trails at Carmel Mountain Ranch Project. I have been a home owner in Carmel Mountain Ranch for 22 years, the first 12 in Provencal Place condominiums then moving into my first house in Waterfield Laurels for which I've lived in the past 11 years. I moved into this neighborhood as a single mother of a 5 year old, mostly for the school district and feeling of safety, as well as the environment. Much has changed since then, with increasing population, traffic, and increased wild fires, yet this is the neighborhood I would choose to remain in. Unfortunately, with this proposed project, I am questioning as to whether to stay or not. Carmel Mountain Ranch is considered a high fire zone area and of course neighboring cities of Poway, Rancho Bernardo and Ramona as very high risk with prior significant damage during previous wildfires.

This size of increased housing: 1200 condos, apartments, and town homes, as the Trails would have, all with automobiles (most likely 2) for every unit, will dramatically increase the traffic in this relatively small neighborhood, already struggling with traffic issues. The safety, especially during wildfires, or earthquakes, is my specific concern. We all saw the fear and panic in one another with previous evacuations during wildfires, all were taking in one direction, with few roads available to do so. With the mass number of increased units and cars this will absolutely create a safety hazard for all of us! The neighboring cities of Poway, Rancho Bernardo and Ramona will need to evacuate and travel on these same roads, causing a gridlock effect. No one would want to see a repeat of the Cedar Fire (2003), where many died in their cars attempting to evacuate, or the Witch Fire (2007) where much of our surrounding neighborhood cities were significantly impacted and escaped/evacuating just in time.

The safety risks and traffic are just 2 of the significant reasons why I oppose this project. Environment loss and damage, loss of community character, are others. Many homeowners purchased these home, at a considerable increase in cost, with golf course views and open space, as part of the "community plan". They were willing to do so, with the awareness that the golf course will consistently be there. This no longer exists, due to the loss of the golf course a few years back. There are many options available for this loss of land, and have been considered from and to this community other than this project, yet the home owners are not listened to as to what is needed and desired in our own neighborhood. It is all about big business, not about affordable housing in San Diego, as the proposed project maintains as their goal.

Thank you,

Shelly Jaffe
14182 Pebble Brook Lane
San Diego, CA 92128

Response to Comment Letter I143

143 Shelly Jaffe
February 7, 2021

- I143-1

The City acknowledges the comment as an introduction to the comments that follow.
- I143-2

Wildfire impacts were analyzed within Section 5.19, Wildfire, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**.
- I143-3

Impacts associated with traffic and transportation are assessed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**.
- I143-4

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I143-5

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

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Comment Letter I144

From: TLC <got.mountain@gmail.com>
Sent: Sunday, February 7, 2021 9:31 AM
To: DSD EAS <DSDEAS@sanidiego.gov>; Troy@wealhanalytics.com
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Project Name – The Trails at Carmel Mountain Ranch
Project Number 652519/SCH No. 2020039006

To Whom It May Concern,

The NUW Carmel Mountain Trails development will have an enormous impact on parking, transportation, safety, and infrastructure. I don't think that was captured and emphasized enough in the environmental report.

The clubhouse area is at significant elevation compared to the region's shopping plazas and the bus station. Giving credit for transportation impact offset by offering bike repair stations is idealistically short sighted. People will not bike to the bus transit nor to the shopping plazas. People do not bike or walk there now. People new to the area are not magically going to do it either.

The elevation and grade are a huge hindrance. A majority of the proposed housing apartments will be situated at the very top of the elevation grade where the clubhouse currently resides. I have walked this area for 15 years. There are very few people who walk anywhere as it is a strong cardio workout no matter which direction you walk.

We live in a realistic world. The development plan needs to account for adequate parking for the apartment complexes that they plan to build. That means, 2 parking spaces (minimum) per housing unit.

The CMR residential and commercial community was planned back in the mid 80s and the homes built in the 90s. The feeder streets to the proposed CMR Trails are almost all residential streets with existing residential homes/units.

The number of housing units proposed is also too much for this area. The current plan would increase the population by 25%, adding 3200 people to the area. Already many cars fly down the hills 15 to 25 mph over the residential speed limit on Carmel Ridge Rd and run the stop signs.

With more housing complex outlets feeding onto Carmel Ridge, there is going to be a lot more traffic and it is going to be a safety nightmare. I already fear to cross at the stop sign intersections which are never enforced. My friends and neighbors who live on Carmel Ridge Rd fear every time they have to back their cars out of their driveways. I can't even imagine how bad it is going to be when 3200 more people are living in that already condensed area.

Thank you for your time and consideration,

Teresa Cottom
11818 Meriden Lane
San Diego, CA 92128

Response to Comment Letter I144

144 Teresa Cottom
February 7, 2021

I144-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. Improvements to alleviate project impacts to traffic operations were identified per the City of San Diego's LMA guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. These improvements will be required as part of the conditions of project approval, they are not mitigation measures, and they are included in Chapter 3, Project Description, of the Draft EIR.

Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant impacts to utility infrastructure with mitigation incorporated.

Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

I144-2 Comment noted.

I144-3 Refer to **Master Response 3** regarding parking.

I144-4 Comment noted.

I144-5 Population and housing impacts are addressed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

I144-6 Refer to **Master Response 3** regarding traffic.

Comment Letter I145

From: Toni TWC email <tpalella@san.rr.com>
Sent: Sunday, February 7, 2021 9:18 AM
To: DSD EAS <DSDEAS@sandiego.gov>
Subject: [EXTERNAL] EIR Concerns -The CMR Trails project

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Re: - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. [2020039006](#)

To whom it may concern,

I would like to express my concerns with regards to the EIR for the proposed Carmel Mountain Ranch project, "The Trails at CMR." As one of the 600+ homeowners that backs up to the former golf course, I have significant safety and environmental concerns that I do not feel the EIR adequately addresses. Please review and address the following concerns.

1. 50 Foot Buffer: Hundreds of CMR homeowners like myself, have 10 foot backyards only. This was something that was reasonable to us at the initial purchase and investment of our home, because we backed up to open space. Now I have significant safety, noise and environmental concerns with the loss of this open space. The proposed 50 foot buffer behind my home should NOT allow for vehicles or roadways within that existing buffer. That is a direct safety threat to my family and children. Frankly, the proposed 50 foot buffer is too small and the EIR does not adequately address safety, noise, and privacy issues for existing homeowners. The current EIR and proposal template for the 50 buffer is too vague.

2. I have significant environmental concerns about the proposed lack of open space. The current proposal is not cohesive or respectful to existing homeowners. We invested in the Carmel Mountain Ranch existing master planned community, to escape the concrete landscape and environmental deficits of the Los Angeles community. This proposed project does not allow for adequate USEABLE open space that is respectful to the existing community or perpetuated by the existing master community plan. This excessive loss of open space will cause considerable environmental damage to the CMR community. The EIR should mitigate these deficiencies.

3. Public safety issues presented by the tunnels are not addressed by the EIR for this proposed project. This is of significant concern to me and my neighborhood community.

4. The EIR does not adequately address the impacts to the adjacent I-15 and I-56 freeways. Especially in consideration of ALL of the currently proposed and approved development projects in the adjacent Rancho Penasquitos and Poway communities. This is inadequately addressed in the existing EIR for this proposed development.

Respectfully,
Toni L'Ecluse
CMR Homeowner
tpalella@san.rr.com

Response to Comment Letter I145

145 Tony L'Ecluse
February 7, 2021

- I145-1

The City acknowledges the comment as an introduction to comments that follow.
- I145-2

Refer to **Response to Comment 02-7** regarding public safety. Refer to **Response to Comment 02-11a** regarding open space. Noise impacts are addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses subject areas, which received analysis in the Draft EIR.
- I145-3

Refer to **Response to Comment 02-11a** regarding open space.
- I145-4

Specific to the issue of safety in the pedestrian tunnels, the analysis for General Plan Policy UD-A.13 included in Draft EIR Table 5.1-2 explained that, the project would incorporate safety lighting throughout the project site for security purposes. Public spaces (i.e., privately owned recreation amenities with a Recreation Easement recorded over them) would also be clearly marked and would be open for public use during designated hours. However, pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours. Refer to **Response to Comment 02-7** regarding public safety.

- I145-5** The TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Nevertheless, improvements to alleviate project effects to traffic operations were identified in the analysis per the LMA guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. No improvements were identified for freeway ramp intersections. Vehicular queueing at freeway off-ramp intersections was evaluated in the LMA (Draft EIR Appendix C) for all analysis scenarios. No ramp queues exceeded storage capacity under any analysis scenario. These improvements will be required as part of the conditions of project approval, they are not mitigation measures, and they are included in Chapter 3, Project Description, of the Draft EIR.

Comment Letter I146

To City of San Diego, E. Shearer-Nguyen, et al,

I would like to thank the Development Services Department and the City of San Diego for the opportunity to comment on this Draft Environmental Impact Report (EIR).

My list of issues and recommendations is attached in the following pages.

As there are significant impacts from my comments, I strongly believe an updated Draft EIR needs to be re-circulated.

Thank You,
John Chiu
Carmel Mountain Ranch / Sabre Springs Community Planning Group Member

I146-1

Response to Comment Letter I146

146 John Chiu
February 7, 2021

I146-1 Refer to **Response to Comment 01-66** regarding EIR recirculation.

Affordability

- EIR should indicate that project is only partially consistent with Policy HE-B.5
Project does not include deed-restricted affordable for-sale units.
- EIR should investigate options to increase the number of units that are deed-restricted for sale
Project of this size and scope should be required to include deed-restricted affordable for-sale units with at least 5% of project for sale housing units

Cumulative Impact

- EIR should be updated to include following projects as any project along SR-56 will likely cause East/West traffic along Ted Williams Parkway. Without adding these cumulative projects, this EIR is does not meet adequacy for cumulative analysis.
 - Millennium PQ (June 2019) 331 units #64431
 - Merge 56
 - Aperture Del Mar
 - Preserve at Torrey Highlands

Alternative Projects

- The EIR should consider the Environmentally Superior Alternative proposed by the CMR/SS CC as that provides a greater potential increase in housing (total # of units, # of affordable rentals, and # of affordable for-sale) with a lower impact to the community and reduced overall environmental impact (such as VMT, greenhouse gas, traffic, etc)
- EIR should consider a Reduced Density Alternative that retains housing on Units 5 & 6 and reduces housing on other units.
 - The current proposed reduced density project alternative does not meet project objectives and fails to investigate better alternatives for the same level of density. Without an alternatives analysis that investigates an alternative of using Units 3-6 (in lieu of other units), the Alternatives analysis is significantly biased to the proposed baseline plan.
 - The EIR does not adequately analyze alternatives that may better meet project objectives
 - Units 5 & 6 provide the easiest access to the I-15 & SR-56 as well as transit (TPA). The reduced density alternative should have prioritized building in Units 3, 4, 5, & 6 due to access to transit & freeways as well as adjacent access to the CMR Community Park. This alternative would allow for a significant number of residents access to the TPA.
 - An alternative plan should be considered that reduces Units 1, 2, 8, & 10 by 25% and Units 9, 16, & 17 by 50 % with no change to Unit 5 & 6. Such a plan would leave 338 townhomes and 478 apartments while keeping 120 affordable units within the TPA.

Unit	Current Baseline	Reduced (Current)	Reduced (Recommended)	Land Use reduction
1 (T)	66	70	49	1.31 acres
2 (T)	87	90	65	1.05 acres
5 (AA)	78	0	78	0 acres
6 (A/AA)	128	0	128	0 acres
8 (T)	98	102	74	1.69 acres

1

I146-2

As stated in Chapter 3, Project Description, of the Draft EIR, the project would include 451 market-rate townhomes on approximately 26.2 acres, 543 market-rate apartments on approximately 19.1 acres, 78 affordable apartments on approximately 2.3 acres, and 128 mixed market-rate and affordable apartments on approximately 3.4 acres. Pursuant to CEQA Guidelines Section 15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. All of the potential environmental impacts caused by the development of affordable housing units on site have been adequately addressed in this EIR.

I146-3

The projects the comment lists and suggests should be added to the cumulative traffic impact analysis, would only be applicable with a level of service analysis, which is no longer required under CEQA to determine impacts associated with a project. However, a level of service was included and disclosed in the LMA for informational purposes only (Draft EIR Appendix C). Level of Service traffic analysis is no longer required under CEQA, with the implementation of SB 743, which now requires traffic impacts to be analyzed under a vehicle miles traveled scenario. The City identified which projects to include in the cumulative projects for Opening Year (2025) analysis based on project location and stage within the development process. The projects included are those expected to be constructed and occupied between the date of existing data collection (2019) and the time of the project's opening year.

I146-4

Refer to **Master Response 10** regarding alternatives.

I146-5

Refer to **Master Response 10** regarding alternatives.

9 (A)	300	195	150	5.55 acres
10 (T)	200	210	150	2.51 acres
16 (A)	123	80	62	2.35 acres
17 (A)	120	78	60	1.64 acres
Total	1200	825	816	16.10 acres

Baseline: 451 townhomes, 543 market rate, 78 affordable, 128 affordable/market-rate

Reduced (Current): 472 townhomes, 353 apartments

Reduced (Proposed): 338 townhomes, 272, market rate, 78 affordable, 128 affordable/market-rate

The project also meets or exceeds the objectives compared to the current reduced density alternative

(Obj 1) Units 5 & 6 would retain the 206 proposed units. Approximately the same number of housing units retained, but with a larger proportion of affordable housing
 (Obj 2) 816 housing units providing a mix of housing for residents, with at least 120 units designated as affordable rentals
 (Obj 3) Reduction in units other than Unit 5 & 6, will decrease the amount of developed land by 16.1 acres. This land can be re-designated as open space or used to reduce the CMR park space deficit. This reduction in space is likely approximately 10 acres greater than the current reduced density alternative.
 (Obj 4) Retain larger majority of ex-golf course for open space and parks. Potential increase open space/parks by 16.1 acres
 (Obj 5) some of the reduction in developed land could be used to increase park acreage address CMR park deficit. There would less overall impact to the library if the library size is not increased
 (Obj 6) Retain proposed trail system and ensure it meets ADA and city bike path requirements.
 (Obj 7) Proposed would provide an improvement over the baseline and the current reduced density alternative for community plan compatibility.
 (Obj Climate & Transport) Proposed project would provide better access to public transit, lower the Vehicle Miles Traveled (VMT), and reduce the Local Mobility impact. Overall lower impact in Greenhouse Gas Emissions. As the housing on Units 5 & 6 is retained, greater than 25% of the development is now within the TPA. This modified alternative could potentially generate VMT per capita 15% below the regional average.

Public Services - Library

- The EIR should correct the Public Facilities and Services Element on page 5.1-126 to indicate the Project is not consistent with objectives and guidelines.
 - The SD General Plan indicates branch libraries should be 15,000 sq ft or larger but the current CMR library is only 13,102 ft. EIR states that "project would increase the demand for library services, thereby exacerbating the existing impact. ... Although the project will make a fair share contribution to address the impacts caused by the associated population increase, the improvements cannot be guaranteed."
- EIR should investigate alternatives that eliminate the public services deficiency such as increasing the size of the library to the recommended 15,000+ sq ft.

Public Services - Parks

I46-5
Cont.

I46-6

I46-7

I46-8

I146-6

Refer to **Master Response 10** regarding alternatives.

I146-7

As noted in Section 5.14, Public Services and Facilities, of the Draft EIR, the proposed project would result in a significant and unavoidable impact to library facilities. Refer to **Master Response 6**. For additional information related to the project's consistency with the City's General Plan and Carmel Ranch Community Plan, refer to **Master Response 1** and Tables 5.1-2 and 5.1-3 of the Draft EIR. The project was determined to be consistent with applicable land use and planning policies and goals of the City's General Plan and the Carmel Mountain Ranch Community Plan.

I146-8

Refer to **Response to Comment 05-3** regarding population-based park requirements.

- **EIR should be updated to indicate Project is Not Consistent with Policy RE-A.8**
 - Project should add 8.9 acres of parks for the 3,180 new residents in CMR; however project only adds 7.87 acres. In addition, the CMR park deficit rises to 21.01 acres. Project should eliminate the deficit in park space by adding 21.01 acres for a total of 27.88 acres of park space.
- **EIR should correct estimated increase in population to be 3,180 on page 5.14-12 to be consistent with other areas within the EIR**
 - Page 5.13-7 indicates “Based on the population rate coefficient of 2.65 persons per household¹ for the Carmel Mountain Ranch community, the project would directly introduce an estimated 3,180 people to the area (SANDAG 2013c)”
 - However, Page 5.14-12 uses non-CMR specific calculation: “The addition of 1,200 dwelling units would yield an estimated additional 2,364 new residents (based on the population rate coefficient of 1.97 persons per household¹ for the Carmel Mountain Ranch community [American Community Survey SANDAG 2017]).
- **EIR should correct the required increase in parks for proposed project to be 8.9 acres (3,180 residents * 2.8 acres /1,000 residents) on page 5.14-12**
- **EIR should consider alternatives that increase the park space to the recommended 2.8 acres per 1,000 people based on the General Plan. Alternatives should address the 20.98 acre deficit in public parks.**
 - Project adds 3,180 residents to CMR for a total of 16,284 residents. A corresponding number of parks per the General Plan should be 45.6 acres. This project adds 7.87 acres to the existing 16.72 acres (total of 24.59 acres), leaving a deficit of 21.01 acres.
- **EIR should correct statement to be “The total amount of parkland provided within the project site would *NOT* meet the City’s park requirements” on page 5.14-12**
- **EIR should also state that project does not address 19.97 acre deficiency that currently exists**

I46-8
Cont.

I46-9

I46-10

I46-11

I46-12

I146-9 Refer to **Response to Comment I146-8**.

I146-10 Refer to **Response to Comment I146-8**.

I146-11 Refer to **Response to Comment I146-8**.

I146-12 With regard to traffic along I-15 and SR-56, the City’s TSM, which established study requirements for transportation analysis in the City, does not require the analysis of freeway segments in the LMA. Refer to **Response to Comment I146-3** and **Master Response 3**.

Transportation & TPA

- **The EIR should conduct freeway impact analysis (I-15 & SR-56) as peak hour trips exceed 150 and update document with completed analysis**
 - Project generates peak traffic generation of 657 (AM) and 772 (PM) peak hour trips. Per city Traffic Impact Study Manual (1998) freeway traffic study is required when trips exceed 150 and by the regionally adopted San Diego Traffic Engineer’s Council [SANTEC] ITE guidelines for impacts over 50 peak hour trips. However, no freeway impact analysis has been conducted although peak hour trips will likely exceed the both requirements.
- **EIR traffic analysis and local mobility analysis should be updated to include following projects as any project along SR-56 will likely cause East/West traffic along Ted Williams Parkway.**
 - Without adding these cumulative projects, this EIR is deficient. Missing projects add significant daily and peak hour trips. For example Pacific Village with 601 units generates 1796 trips - so Millennium PQ with 331 units could generate at least 989+ daily trips. Commercial projects such as Merge 56 and Aperture Del Mar will generate significant

E/W traffic on SR-56/Ted Williams and N/S I-15 as they draw workers from the larger regional area.

- Missing Projects for traffic analysis
 - Millennium PQ (June 2019) 331 units #64431
 - Merge 56
 - Aperture Del Mar
 - Preserve at Torrey Highlands

- **EIR should be updated to not use the TPA designation for units that do not have any portion that is within the TPA**

- The ordinance that "all or a portion is located of the premises within a transit area" is intended for contiguous properties. That it should apply to a golf course with independent units/lots that spans multiple major roads and intersections appears to be a gross misappropriation of the ordinance. To indicate that Unit 16 more than 1.5 mile away is part of the TPA is technically and logically incorrect.

- **EIR should state only a portion or fraction lies within TPA throughout entire document**

- Only 2 units out of 17 are located within TPA

- **EIR should update traffic analysis to reflect Ted Williams (WB) between Rancho Carmel exit and I-15 is only 2 lanes and that significant & unique queuing that occurs in the right lane.**

- Ted Williams WB between Rancho Carmel exit lane and I-15 is only 2 lanes, not 3 lanes. Furthermore, due to the I-15 NB and SB on-ramps access on the right hand lane, significant vehicles queue up in the right lane occurs during peak AM trips generation. When this occurs, vehicles in the right lane on Ted Williams include I-15 on-ramp traffic, Rancho Carmel-Ted Williams WB merging traffic, and Ted-Williams to Rancho Carmel NB/SB exit ramp traffic. Vehicle backups on Ted Williams WB from I-15 SB on-ramp to Shoal Creek Drive often occur during this period.
- See figure below:



4

I46-12
Cont.

I46-13

I46-14

I146-13

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a)(2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

I146-14

As noted in the Draft EIR, Ted Williams Parkway from I-15 to Rancho Carmel Drive is classified as a 6-lane expressway, and three lanes are provided up to the westbound exit ramp and after the westbound entry ramp onto Ted Williams Parkway from Rancho Carmel Drive. The portion of Ted Williams Parkway in-between the westbound ramps is two lanes; however, the City classifies Ted Williams Parkway as a 6-lane expressway between the I-15 ramps and Rancho Carmel Drive, as accurately stated in the Draft EIR.

In addition, an analysis pertaining to the project's impact or addition to this traffic queue would only be applicable with a level of service analysis. Since July 1, 2020, level of service is no longer the applicable standard for transportation analyses in CEQA documents, and as such, traffic increases along roadway segments no longer serve as a basis for determining whether a project may cause an impact. The project's traffic impact is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**.

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Comment Letter I147

This letter is submitted on behalf of the residents of:

14144 Stoney Gate Pl, San Diego

Carmel Mountain Ranch in response to the proposed Trails at Carmel Mountain Ranch Draft Environmental Impact Report.

Environmental Impact Concerns for project Project No. 652519

SCH No. 2020039006

SUBJECT: Trails at Carmel Mountain Ranch:

Topic area	Issue	Comment
Land Use	Development on Unit 8	There is a natural cooling of the air mass and a natural dropping of temperature linked to unit 8. This may be defined as a micro-climate or weather phenomenon as it is naturally occurring, it is constant and it occurring at the same location. Building 98 dwellings within unit 8 and adding impervious surface to over 95% of the alley floor in this area will interfere with the natural cooling of the air mass over this region and disrupt this naturally occurring weather phenomenon. Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area. **Please refer to note 1 below for discovery and discussion.
Air Quality	Development on Unit 8	Any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location. A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit. Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area. **Please refer to note 1 below for discovery and discussion.

I147-1

I147-2

I147-3

Response to Comment Letter I147

147 Ming Han

February 7, 2021

I147-1

The City acknowledges the comment as an introduction to comments that follow. No further response is required.

I147-2

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use consistency. The project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan.

Impacts related to the addition of impervious surfaces are addressed in Sections 5.10 (Hydrology) and 5.18 (Water Quality), of the Draft EIR. In both instances, the Draft EIR concluded the project's potential impacts would be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

I147-3

Specific to air quality, the purported topic area, the project's potential air quality impact is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7** regarding air quality and **Master Response 10** regarding alternatives.

Biological resources	Development on Unit 8	Development as proposed by NUW will add 98 dwellings and interfere with, alter and/or destroy over 95% of the natural habitat within unit 8. This area contains a unique deep valley setting with unique characteristics and unlike any other area this development is altering. As noted by NUW, Unit 8 is up to 20' below adjoining homes and all sites are sloped slightly to ensure drainage. Further, any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location. A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit. Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area. **Please refer to note 1 below for discovery and discussion.
Geologic Conditions	Development on Unit 8 and Unit 2	DSD EIR #652519 stated there was a unique area of topsoil and very moist ground areas in findings but never mapped out. Further include in the EIR report the relevance of the finding topsoil and if it is natural topsoil. "It takes time for topsoil to develop from the breakdown of organic matter (500-1000 years for 1-2 cms in some places). Source: https://www.bettermeetsreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/ Also determine or rule out if the creation of topsoil is in direct correlation to the moist and very moist area as mentioned previously and include in EIR. Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area or interfere with the natural elements that may be attributing to the creation of topsoil and other natural soils and surfaces. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area that may also be connected to the geological conditions. **Please refer to note 1 below for discovery and discussion.
Greenhouse Gas Emissions	Development on Unit 8	Extensive development in this area will cause increased and altered GGE and may alter the unique micro-climate weather phenomenon presented in this area. Further all vehicle traffic will be getting routed by development to the exact location that this weather phenomenon is being experienced. The ADT provided by NUW show 784 at the entry and exit points. **Please refer to note 1 below for discovery and discussion. A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit. Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.
Hydrology	Development on Unit 8	DSD EIR #652519 stated they discovered very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR. Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area. **Please refer to note 1 below

I147-4

I147-5

I147-6

I147-7

I147-4

Impacts to biological resources, including natural habitat, are analyzed in Section 5.4, Biological Resources, of the Draft EIR. The analysis concluded that the project would result in less than significant impacts with the incorporation of recommended mitigation. Impacts associated with drainage patterns, which are analyzed in Section 5.10, Hydrology, of the Draft EIR, were determined to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I147-5

The determination as to whether natural topsoil occurs within the project site is not an issue or an impact area that is required to be analyzed under CEQA. It should be noted that impacts pertaining to soils and geologic conditions are addressed in Section 5.6, Geologic Conditions, of the Draft EIR. As explained therein, the project will not result in significant geologic impacts. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I147-6

Greenhouse gas emissions impacts are analyzed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. The Draft EIR determined the project would result in less than significant impacts. Refer to **Master Response 8**.

Traffic related impacts are assessed in Section 5.2, Transportation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I147-7

The comment pertains to the Draft EIR's hydrologic analysis. Refer to **Response to Comment I147-4**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

1147-8
1147-9
1147-10

I147-9 Impacts pertaining to streams and wetland/jurisdictional resources were analyzed and addressed in Section 5.4, Biological Resources, of the Draft EIR. It was determined that no direct or indirect impacts to wetlands, streams or jurisdictional resources would occur with project implementation.

I147-10 To the extent the comment raises concerns regarding open space, refer to **Response to Comment O2-11a**. Refer to **Master Response 1** regarding land use. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

Visual Effects/Neighbourhood Character	Development on unit 1, 2, 8, 9	<p>85% of Belle Fleur homes 85% have a green belt view from their backyards and another 12% having a partial green belt view from their properties. This development plans to incorporate multi-story, multi-family dwellings on over 85% of the land that makes up the green belt adjacent to the Belle Fleur homes. This will be a substantial change for over 85% of homes in Belle Fleur and a somewhat impactful change for 12% of the homes in Belle Fleur with partial views of green belt.</p> <p>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit.</p> <p>This development plans to utilize the majority of area on unit 1, 2, 8 and 9 for dwellings and amenities for these dwellings and will have a substantial direct impact on over 85% of homes in Belle Fleur, yet no dwellings in the plan to incorporate will match the same real estate classification as the homes in Belle Fleur. Characteristics of Belle Fleur homes are stand-alone single-family structures with front, side and backyards. Homes are approximately 2250-2550 square feet.</p> <p>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit. Plan to include some family homes on unit 9 that match the real estate style and type.</p>
Public services	entire development impact on population and resources.	Introducing a drastic increase in the CMR population yet continues to decline adding essential public services such as library, schools, and safety professionals.

****Note 1**

There is a weather phenomenon present at unit 8. Since the pandemic I have been walking on average 8-12 times per week past a particular section at the end of unit 8 along Shoal Creek Drive.

I walk around the entire perimeter of unit 8 going from Boulton Ave heading towards the East, then I turn right onto Carmel Ridge, I take another right onto Stoney Peak Drive, and another right onto Shoal Creek. As I approach the opening or valley view to unit 8, I feel the air get colder and remain a cooler temperature until I am close to the first property on the corner of Shoal Creek and Windcrest Lane. I continue up Windcrest Ave until Boulton Ave, where I take another right and complete an entire circle around the perimeter of unit 8. I usually walk early mornings between 6:30-8:00am and/or 6:30-9:30pm.

There is a noticeable and constant drop in temperature at this precise location (see pictures) every time I travel through it.

I am no expert in weather patterns but there is definitely some form of unique micro-climate or weather phenomenon that is caused by the properties of natural elements that are present at unit 8 and that is naturally causing a cooling of surface air in this location. I have walked through this location over 250 times within the past 6 months and every time this constant pattern of cooler surface air is present at the same exact location.

The drop in temperature is quite sudden and dramatic and can be easily physically detected when one is present in this area.

I147-11

I147-12

I147-13

I147-11

Visual character is discussed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I147-12

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Schools and libraries are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Impacts to library facilities were determined to be significant and unavoidable. Refer to **Master Response 6**. Section 5.14, Public Services and Facilities, of the Draft EIR concluded that the project would not result in any other significant public service impacts. The comment addresses subject areas, which received analysis in the Draft EIR.

I147-13

Comment noted.

Due to climate change and all factors that are adding to global warming, I believe a full report should be made and documented to see what is causing this weather phenomenon at unit 8 and if in fact, we should do our best to preserve such a unique natural phenomenon.

Further, I also came across part of the EIR that mentioned unit 8 had moist areas that were not mapped and I believe now that further inspection and mapping should take place. This should include instruments that may detect underground streams or other forms of moisture that could be a cause of effect of factors associated with this micro -climate weather phenomenon taking place.

The DSD EIR also mentioned unit 8 had an area of topsoil and other minerals in the soil that may also be taken into consideration as to a possible cause and/or effect of any conditions associated with a weather phenomenon or micro-climate.

Unit 8 is a very unique area that presents a valley setting that will be permanently destroyed by this development. According to NUW, unit 8 is the only area that will be graded 20' below adjoining homes. Unit 8 is a beautiful deep valley and quite unique location when compared to the other development areas and we should seriously consider to preserve this area

Further the exact location on the micro-climate weather phenomenon is where this development plans to have the vehicle access to unit 8 with 784 ADTs according to information provided by NUW.

748 ADTs will also add to green gas emissions and altering of the air in this location.

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1147-13
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Comment Letter I148

Response to Comment Letter I148
148 Michelle Nguyen
February 4, 2021

E. Shearon Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

RE: Objection and Comments from Resident located in the area impacted by this project The Trails at Carmel Mountain Ranch, Project Number 652519/CH1 No. 202003008

Dear Ms. Nguyen

Thank you for going through our concerns as laid out below.

My name is Michelle Nguyen and I am the homeowner at 14064 Montfort Court, San Diego CA 92128.

I would like to object the development of the project all together. I would like to provide you some concerns with respect to their proposed plan some of which previously may have been expressed to you by our HOA committee already.

Please take note of these concerns and we request that you do not approve their proposal. I can be reached at my cell 6197190152 or my office, info below. Thank you for your immediate attention to this matter and I appreciate a reply acknowledging our concerns and let me know your plan to resolve our concerns and direct responses to their development proposal.

Michelle Nguyen

So, Portfolio Manager

BIRDSON INVESTMENT MANAGEMENT, LLC.

Direct: 858.304.1214

After Hours Emergency: 858.284.1192

mynguyen@bksmanagement.com

120 S. Sierra Ave | Solana Beach, CA 92075

The project will be negatively impactful to our safety and health, including but not limited to the fact that our mother and father are much older and not currently in good health, they are allergic to noise and dust, that's why we moved them here to make sure they have clean air quality and questions to cope with their health being deteriorating. Our mother has cancer so it's imperative that she is not subject to any parking construction, including traffic/crowds that which will impact her health tremendously. Our father has allergy and are sensitive to such creative landscaping.

In addition,

Project Does Not Meet Objective to Provide a Range of Housing Types Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

- The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to larger vehicle arterials and bus stops. There is also substantial 60-100' variable landscape buffer areas with grade separation between different developments for further neighborhood distinction and defense purposes.

- NUW developer has not provided a precise site development plan showing building pads and roadways which does not allow for a thorough community and city analysis of the project overall. Analysis and interpretations by City and others may not be accurate.

- The NUW developer was asked many times to provide similar type housing next to existing housing types so as to blend seamlessly with the CMR community. At the 18th community meeting NUW instead came back with 3-4 story apartment housing that fails to be anywhere near compatible with the adjacent established residential communities.

- Developer was consistently asked that failed too far to consistently preserve the view corridor of existing homeowners throughout project, especially premium views at hilltops and upper areas (as designated for in original Community plan. A who plan in a traffic study by developer indicated walls of 3-4 story buildings along with a lack of grade separation that is not only unsuitable but unacceptable to the CMR community plan guidelines for development.

- Aerial map of the developer's guidelines for the Trails and a previous letter were provided by the CMR/SDCC/CPG in the City of San Diego Planning Department and SDG&S yet this information was not part of the EIR's APPENDIX A - Scoping Letter and NFP Comments (Parts 1 and 2). Also, no CMR/SDCC/CPG meeting minutes references were found to be a part as well.

- Proposed Multi-Family Multi-story Construction is Not Compatible With Existing Homes Project Objective 1, Section ES.3 not met - as the range of housing types are not compatible with the adjacent established residential communities.

1/31/2021 - Page 5

* The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%. The Trails consist of 70% Apartments, Carmel Mountain Ranch has 24%. Carmel Mountain consists of about 52% single family homes. The Trails, 0 single family homes. * The Trails at Carmel Mountain Ranch proposes building heights at 37' and 48' with maximum building setbacks at 500 from the property lines of existing 2-story homes.

Page 83 of the Carmel Mountain Ranch Community Plan under Design Compatibility, paragraph 1, "The choice of building heights will be geared to the silhouette of the terrain. Higher buildings are planned on lower ground particularly within the Town Center area".

Please see Figure 27 on page 84 of the Community Plan where apartment buildings are placed at lower elevations so as not to tower over single family homes. The apartments in Carmel Mountain Ranch are also built on the outer edges of the community, not in between rows of single family homes. Please see Google Maps for Carmel Terrace, Carmel Summit and Carmel Landing apartments. Google Maps satellite view of Carmel Ridge Road.

The Trails will be an infill project with large multi-unit buildings 37' and 48' tall and 50' from existing 2-story homes. Height differences could be even greater depending on lot elevation.

In comparison, the 3-story Jefferson Apartments have at least a 100' separation from the condominiums at Willard and a 200' separation across the former freeway to the homes on Carmel Ridge Rd. Carmel Landing Apartments are a lower elevation to homes on the east and are separated by a 4 lane parkway (Ranch Carmel Drive) to the west. Homes in Carmel Mountain Ranch that have a 50-foot or less near separation are of an equal height and type, single family home to single family home.

Again, please see Google Maps above to confirm.

Project Does Not Meet Objective to Provide a Range of Housing Types Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

- The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to larger vehicle arterials and bus stops.

- NUW developer has not provided a precise site development plan showing building pads and roadways which does not allow for a thorough community and city analysis of the project overall. Analysis and interpretations by City and others may not be accurate.

- The NUW developer was asked many times to provide similar type housing next to existing housing types so as to blend seamlessly with the CMR community. At the 18th community meeting NUW instead came back with 3-4 story apartment housing.

I148-1

I148-1

Comment noted.

I148-2

Comment noted.

I148-3

Refer to **Response to Comments O2-3** through **O2-72**.

I148-2

I148-3

Response to Comments

[illegible]

I148-3
Cont.

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RTC-659

1/31/2021 - 2:02pm

• **ARI-1 - the zoning according to the community plan but in the SD General plan it is identified as Parks and Recreation. City's Climate Action plan requires additional park and recreation spaces. The City should not allow destruction of Park and Recreation space. There are many opportunities to add affordable housing without destroying park and recreation space. We should look to retail shopping existing retail shopping centers that will continue to see vacancies due to the explosion of online shopping and the closure of brick and mortar retail.**

• Library impact, offering a community poetry art building is inadequate we need to more library space. The offering of an arts center in exchange for massive environmental damage.

• The concept of calculating open space is flawed. Project is 167 acres. Developer calculates that they will construct buildings on 51 acres. They state that 23% of the property will remain open space. That statement is misleading. In fact they only count building footprints as development. They plan to construct many, many buildings on 11 of the 18 holes. We contend that each hole that is built upon should remove that hole from consideration of open space. If that were the case the calculation of fast open space is 61%. Further each hole built will have many many buildings. An example would be unit 6. The plan is to construct 78 apartments on 2.3 acres of the 7 available acres. If they were to build 10 buildings, 48 feet high spread across the 7 acres how can they contend that 5 acres of open space is left? In reality, the seven acre unit will be entirely covered with buildings, roads, parking.

Wildfire Fire Evacuation Analysis Does Not Fully Reflect Project Impacts The Draft EIR's treatment of fire evacuation ignores historical data. The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Nowhere in the basic treatment of fire evacuation in the community itself (pdf page 603, 5.19 Wildfire; PDF pages 612-18, 5.19.3 Impacts Analysis, Issues 1-3), or unaddressed with cumulative impacts of adjacent communities (PDF page 637, 6.1.19 Wildfire) are evacuation times even mentioned. Appendix D, Fire Fuel Load Modeling Report, is similarly deficient. The Draft EIR does acknowledge that "Typically, the highest fire danger is produced by the high-pressure systems that occur in the Great Basin which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 mph and may exceed 50 mph during extreme conditions." The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting illegal evacuation routes. There are recent high wind-driven ember fires, with mass evacuations ordered, and illegal evacuation routes. This data must be presented and considered along with the additional impact of 1,180 additional residents and their vehicles. It is not enough to simply state, as the Draft EIR does, that the San Diego County Emergency Operations Plan (EOP) (Page 2003) (Issue Q, Evacuation) will not be impacted (pdf page 611-6), or that "For emergency evacuation, the EOP identifies 1-15 and SR-56 as emergency evacuation routes in the vicinity of the project site. Portions of the project site are located adjacent to 1-15 to the east and to the northeast of SR-56. For the VMT Analysis (Appendix G) to this EIR, the proposed project is anticipated to add 7209 average daily trips to and from the project site." (pdf p.613), without further data or analysis. The County EOP as fact in Annex Q, Evacuation, p. 16, provides a formula for determining evacuation times. The recent high wind-driven ember fires and CMR evacuation routes should have been studied and should have produced data available to the City and developer. The Draft EIR needs to get this data or produce it if it has not been compiled, and add the additional impact of 1,180 additional residents and their vehicles to determine the true threat to the community of this massive project.

1/31/2021 - Page 21

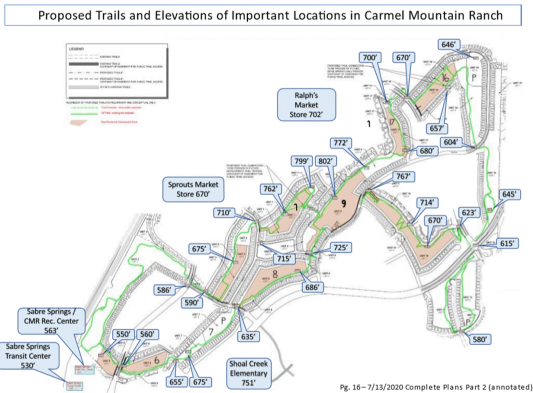
Project Alternatives Project Alternatives Should Include a Low-Unit-Cost Option For Project Option, 1,200 units, 825 Units, Change of Footprint, No Project - The 1,200 and 825 unit and Change in footprint options result in a significant, unmitigable impact on transportation/circulation, public service, and population and housing. Suggest that there be an additional option where the significant impacts can be mitigated. A 250 unit option would likely result in a good compromise. Project Reduced Density Option Draws Invalid Conclusions Reduced Density option comes to the conclusion that since the 825 unit option would not cause the significant and unavoidable impacts it makes sense to not consider this option due to the "slight" reduction in reduced population, housing and transportation impacts. That conclusion is faulty. In fact, the reduced option would reduce the population from 3,180 people to 2,186. That represents a 31.4% reduction. By any measure that should not be considered slight. Further if the 825 unit option does not improve impacts would it not make more sense to evaluate options somewhere between 0 and 825 units?

Mixed-Use Development in Shopping Centers Is Not Addressed as an Alternative There are alternatives for housing in areas that are already developed for commercial use. Due to factors such as online shopping, increasing COVID-caused work-from-home impacts, and higher vacancies in retail and office space there are increasing opportunities for mixed-use developments.

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Appendices

Appendix A – Carmel Mountain Ranch Elevation Map



I148-3
Cont.

Comment Letter I149

Dear E. Shearer-Nguyen,

I am writing after reading the EIR report as I have many concerns regarding the environmental impact of this proposed project.

Extreme Wildfire Risk

The Carmel Mountain Ranch Community is in a state designated Very High Fire Severity Zone. The community narrowly escaped being enveloped by the 2007 Witch Creek Fire which burned over 2,000 acres. The surrounding communities of Rancho Bernardo, Poway, Ramona and Escondido had over 1,000 homes destroyed.

The EIR mentions brush management and units with fire protection systems. However, as we have seen before, these safeguards will be unable to stop a massive wildfire stoked by heat, drought and high intensity Santa Ana winds.

Evacuation Gridlock

An addition of more than 3500 new residents would certainly lead to a dangerous gridlock situation in the event of a wildfire. Routes 56 and 15 are frequently slowed with stoppages due to normal traffic patterns. The majority of Santa Ana fueled fires have winds coming from the east. Fleeing residents of the communities of Rancho Bernardo, Poway, Ramona, Escondido and others would lead to severe congestion of the roadways leading in our direction.

The potential for loss of life is great!

The EIR has not analyzed a potential evacuation scenario in response to a massive wildfire. This is in violation of CEQA.

Misrepresentation of Open Space

The wording in the EIR implies that the project will increase open space by 112 acres. This is simply not true. It will decrease open space by 52 acres. The previous golf course which is designated as agricultural land was considered part of the open, green space of the community in lieu of other green spaces being built into the community original plan. The developers plan to build on 11 of the 18 holes. this is a net loss of 61% of open space.

The developers contend that they are building on 51 acres and two-thirds of the property will remain open space. This is not true. Only the building footprints are being measured. The parking lots, driveways and roads are not being included in this evaluation.

A prime example is hole 6. The project is to place 78 apartments on 2.3 acres of the 7 available. In actuality, potentially 10 buildings may be needed at 48 feet each (4 stories). In

I149-1

I149-2

I149-3

I149-4

Response to Comment Letter I149

149 Patricia Daum

February 7, 2021

I149-1

Comment noted.

I149-2

Wildfire hazards are discussed in Section 5.19, Wildfire, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**.

I149-3

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I149-4

Refer to **Response to Comment 02-11a** regarding open space. Refer to **Response to Comment 01-11** regarding SB 375 consistency.

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3_of the Draft EIR, regarding project consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

addition to all the parking lots, space between buildings and driveways and roads, most of the 7 acres would be built upon.

The EIR states, "The project is designated park, open space, and recreation in the general plan." (5.7-16).

The City of San Diego General Plan states, "The General Plan is the foundation upon which all land use decisions in the City are based. It expresses a citywide vision and provides a comprehensive policy."

The EIR ignores and violates Senate Bill 375 that requires California to preserve open space and not build large housing projects on open space and park land.

In Conclusion

The addition of 1200 multi-family units, and over 3500 new residents will lead to the destruction of community character (no single family homes included in plan). The grading to flatten the rolling hills will destroy the topography that is part of the original general plan. The increase in population will lead to a massive increase in greenhouse gases exacerbating climate change, and gridlocked traffic especially in the event of a wildfire.

I appreciate your time in considering my concerns.

Sincerely,

Patricia Daum

I149-4
Cont.

I149-5

I149-5

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**. Refer to **Response to Comments I149-2** and **I149-3** regarding wildfire hazards and evacuation. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I150

February 2, 2021
E. Shearer-Nguyen, Environmental Planner,
City of San Diego Development Services Center,
1222 1st Avenue, MS 501,
San Diego, CA 92101
Via e-mail to DSDEAS@sanidiego.gov
Re: Project No. 6526519, SCH No. 2020039006

Dear Ms. Shearer-Nguyen and City Council:

We are current residents of Carmel Mountain Ranch who have thoroughly reviewed the EIR for the proposed Trails at Carmel Mountain Ranch Project (heretofore the Project). Because of the numerous issues and discrepancies with the Project EIR, we are strongly opposed to the Project in its current form.

This letter will discuss the following categories: increased wildfire & fire evacuation risk, loss of the open space and parkland, destruction of community character, lack of access to mass transit, traffic and pedestrian danger, construction noise and health risks, and lack of adequate project alternatives.

Wildfire

The EIR acknowledges that a large portion the Project is in a Very High Fire Hazard Severity Zone (per the state map on grid tiles 35, 36, and 40 on City of San Diego Fire Map, 2009). Although not all of the Project footprint falls in the Very High Fire Hazard Severity zone, one can easily see from the history of wildfires in California, a large fire would not simply stop at the boundary of the Very High Fire Hazard Zone and the risks in adjacent zones should be considered holistically. As seen in the massive fires in San Diego in 2003 and 2007, once a large Santa Ana-driven fire sets a suburban community ablaze, the entire community can burn down (see 2003 burn maps from Scripps Ranch). Furthermore, although the EIR attempts to mitigate some of the fire risk through brush clearance and in-home sprinkler systems, that fails to address wind driven Santa Ana fires that can burn thousands of acres in hours rendering such mitigations useless.

Furthermore, the EIR does not specifically address the potential for gridlock and loss of life during a mass evacuation in the Poway and Carmel Mountain Ranch region. The EIR simply states that *"the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired (pdf page 613-4)"* and that *"For emergency evacuation, the EOP identifies I-15 and SR-56 as emergency evacuation routes in the vicinity of the project site."* The EIR should include data that can be modeled and presented showing the impact of 3,000+ additional residents and their vehicles using a few evacuation routes during a large-scale evacuation that includes residents of Poway and Ramona (where a large wind-driven fire would likely come from).

Loss of Open Space and Parkland

The current community plan for Carmel Mountain Ranch states that there will be *"opportunities, as well as visual open space, for the entire community"* and that there will be *"Development of neighborhood and community parks that adequately meet the needs of residents by location and amenities."* Currently, Carmel Mountain Ranch has too few parks based on the city guidelines of 2.8 acres of park per 1000 residents – Carmel Mountain Ranch has only 2.0 acres of park per 1000 residents (note: these city guidelines for parks existed from 1956-2020, and I was unable to use to the new Parks Master Plan to calculate quality of Carmel Mountain Ranch parks). When the community was built in the 1990s an exception was made for having too few parks because of the large open/recreational space provided by the golf course was a recognized as Parks and Recreational Open Space per the city guidelines and the Carmel Mountain Ranch Community plan (source: https://www.sandiego.gov/sites/default/files/carmelmountainfinal_0.pdf).

Response to Comment Letter I150

150 Kristen and Jonathon Greer

February 2, 2021

I150-1 The City acknowledges the comment as an introduction to comments that follow.

I150-2 Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5.**

I150-3 Comment noted.

This proposed project would result in a massive loss of open space and recreational space. Despite the project's claim, the community will not gain any new open space, in fact the proposed project will result in a net loss of open space of approximately 60%.

Furthermore, the EIR's concept of calculating open space is flawed. The Project is 167 acres. The Developer calculates that they will construct buildings on 51 acres. They state that 2/3rds of the property will remain open space. That statement is misleading because they are only counting the actual building footprints as development. Buffer zones, parking, shrubs, rocks and barrier trees immediately adjacent to construction should not be counted as open space that is equal to true nature space for animals, solitude, and community enjoyment. Rather, each hole that has development on it should be removed from the calculation of "open space," generating the 61% loss of open space estimate.

Once the open space is lost, the community, which currently is "under-parked", will still be under-parked despite the nine new acres of parkland proposed by the project. Adding the new proposed parks and new residents will only get Carmel Mountain Ranch to 2.2 acres of park per 1,000 residents. Additionally, the city is focusing on park quality, but the new parkland provides no space for organized sports such as ball fields, pickle ball, or basketball for 3,000 new residents. San Diego's plan to invest in higher quality and higher quantity parks and open spaces should be reflected in this development.

Finally, the EIR states itself that the development plan for parkland is incomplete/unknown. It says, "proposed outdoor spaces include trails, nature viewing areas, children's play areas, picnic areas, a space for outdoor performances and entertainment, farmers markets, and an open park area to support sporting activities and movies in the park. While design details, such as location, capacity, specific activity elements, site configuration, and design are unknown at this time." Due diligence suggests that the full design and amenities for the proposed park and community space be provided in the EIR before the one of the largest city developments in over a decade is approved.

Community Character

According to the [community plan](#), currently Carmel Mountain Ranch is made up of 11% low density residential, 64% low-medium density residential, and 25% medium density residential. The proposed project is 0% low density, 73% low-medium density residential, 27% medium density residential, an. Given the large scale and impact of the proposed development, the mix should reflect the existing community character and include more lower-density housing.

But more importantly, the definition of the low-medium density residential encompasses a very large range of density. The definition of low-medium residential is 6-29 dwelling units per acre (du/ac). While a majority of Carmel Mountain Ranch is currently zoned as low-medium residential, the average density for the homes currently zoned as low-medium in Carmel Mountain Ranch residential is 8 du/ac ([source: CMR community plan](#)). The average density for the low-medium residential homes in the proposed project is 21 du/ac. The proposed project is **260% more than the community is today for this type of housing, which would represent a massive change in community character based on this density alone.** The current smaller garden homes and duplex homes zoned as low-medium density would be towered over by 3-4 story condo-type housing, yet this is all considered low-medium density residential (Note: The averages for the current community density were calculated using the CMR community plan and the averages for the proposed development were calculated using tables provided in the EIR. My full excel-based analysis is available upon request)

Similarly, the average density of the current medium density residential in Carmel Mountain Ranch is 20 du/ac. This proposed project has an average medium resident density of 36 du/ac. This is an 170% increase in density for the medium residential units – another large departure from the current community plan and character.

I150-4

I150-4

Refer to **Response to Comment 02-11a** regarding open space.

I150-5

I150-5

Refer to **Response to Comment 02-11a** regarding open space. Refer to **Response to Comment 02-11b** regarding the park development process.

I150-6

I150-6

Impacts associated with the provision of park space is are addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. As noted in this section, the project would provide adequate park space to meet the City's 2.8 acres-per-1000 people standard. Thus, it was determined that the project would result in a less than significant impact to park and recreation facilities. Refer to **Response to Comment 05-3** regarding population-based park requirements.

I150-7

I150-7

Refer to **Response to Comment 02-11b** regarding the park development process.

I150-8

I150-8

Refer to **Master Response 1** regarding density. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

A more sensible proposal would be one that matches the current community in terms of type of housing (low, low-medium, and medium) as density defined by and du/ac.

Finally, the EIR states the following *"the project site is not located in a highly visible area and is developed on all sides with existing residential development."* This is very misleading, as the project site would infill almost every available acre of developable land in the community (note: the lands the developer is leaving as "open space" are almost entirely made up of wetlands, floodplains, and fossil sites which are difficult or illegal to develop). The developments would tower over existing residents and would be seen throughout the community from many streets, from the Shoal Summit and Walden neighborhoods, and from the 1000s of homes that would now border the new large development.

Lack of Transit Options

The project gets credit for being in a transit priority zone when in reality very little of the project is truly walkable to public transit. Only proposed Units 5 and 6 are within walking distance of the Sabre Springs/Peñasquitos Transit Station, which is a bus-only route with limited reach. This disjointed project should not get credit for being in a TPA when the reality is that the majority of the units planned are one or even two miles from the station.

Additionally, the Transit Station has very few routes and is inadequate. Only three bus routes run out of the Transit Station and no rail is planned for this site. Route 235 and 290 runs to downtown, with the trip taking about 50-60 minutes from Sabre Springs to Downtown depending on traffic. A car can often complete the trip in half that time. None of the transit lines go East/West to Sorrento Valley where many residents work. To get West one must take the 235 or 290 to Mira Mesa and then transfer to a bus that travels along Mira Mesa Blvd. Route 944 runs from the Sabre Springs Transit Station to a small portion of Poway sites along Poway Road, ending near the Poway Walmart. We were unable to obtain ridership numbers on these routes, but anecdotally these existing routes have limited use or appeal to most inhabitants of inland north county.

Finally, the project proposes bike paths to solve the "last mile" issue for the community – however, Carmel Mountain Ranch is quite hilly with some very large inclines throughout. While using the old cart paths as bike paths is an interesting idea, the average citizen cyclist would likely find many parts of these routes too steep to use from both a practical and safety standpoint as they were built for motorized vehicles (golf carts). Likewise, these paths will be connected by existing main roadways and these main roadways in Carmel Mountain Ranch are busy and congested, especially near the shopping centers and near Ted Williams. Existing bike lanes are limited and typically along unprotected shoulders. Overall, Carmel Mountain Ranch does not have a bicycle culture. Additionally, the proposed senior living portion of the development is ~2 miles from the transit stop, and only the most physically-fit senior citizens would be able to walk or bike the steep hills to get to the transit stop. It is unlikely bicycling will be a significant mode of transport for shopping or commuting. Common sense suggests cars and car trips will be much higher than calculated in the EIR. Bicycle-centric communities are a wonderful idea in the flat coastal communities across San Diego, but are significantly less practical in a community made up of hills and valleys like Carmel Mountain Ranch.

Traffic and Pedestrian Danger

The EIR states that there would be 7,928 daily trips added by the proposed development and therefore, the Project is not considered a small project.

It proposes *"traffic calming measures and low speed designs would be used in the design of on-site roadways, with "shared roadway" markings identifying that bicycle use is permitted"* this doesn't address that many of the roads already have heavy daily usage, with cars often traveling far above the speed limit. For example, the Ted Williams Parkway/ Highland Ranch Road intersection has been the site of several high-speed accidents involving serious injuries (a January 2020 crash at that site left a young Carmel

I150-8
Cont.

I150-9

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I150-11

I150-12

I150-13

I150-9

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I150-12

I150-13

Refer to **Master Response 2** regarding aesthetics impacts and private views.

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area. Refer to **Master Response 3** regarding transportation/circulation.

Comment noted.

Comment noted.

Impacts associated with traffic and transportation/circulation are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**. Additionally, Section 13 of the LMA (Draft EIR Appendix C) states that the intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The LMA lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety. Improvements to alleviate project effects to traffic operations include right-turn overlap phasing at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road

<p>Mountain Ranch home owner with permanent brain and spine damage). Likewise, many of the hilly side streets are already overcrowded due to being used as "cut throughs" and are being studied by the city for speed mitigations (Esprit Ave is just one example of these).</p>	<p>↑ I150-13 Cont.</p>	<p>intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. These improvements will be required as part of the conditions of project approval, they are not mitigation measures, and they are included in Chapter 3, Project Description, of the Draft EIR.</p>
<p>The addition of thousands of new cars to the existing roads put current and future Carmel Mountain Ranch resident lives in danger, especially when the project doesn't plan for new speed calming measures for existing dangerous roadways.</p>		
<p>Construction Noise and Health Risks</p>	<p>↑ I150-14</p>	
<p>The proposed development is an "infill" development across numerous plots of land that are each encircled by thousands of existing homes. The residents of the community will have significant disruption in terms of noise and air pollution as this project is constructed over multiple years.</p>		
<p>The mitigations to the noise and air pollution in the EIR are not adequate. As a noise mitigation the EIR states, "Construction operations and related activities associated with the proposed project shall be performed during daytime hours, as outlined within the San Diego Municipal Code, between 7:00 a.m. and 7:00 p.m., with the exception of the days and holidays identified in the Municipal Code." With many companies now permanently moving workers to all-remote work or part-remote work, this does nothing to help with noise residents will experience while working from home for the years that construction is happening outside their windows.</p>	<p>↑ I150-14a</p>	
<p>In terms of air pollution, this project calls for a massive amount of grading which leads to fugitive dust. Fugitive dust is carcinogenic and is implicated in a host of respiratory problems including COPD, asthma, emphysema, lung cancer and valley fever. Typically, a project with this level of grading is in a relatively unpopulated area and is not an infill development with tens of thousands of residents immediately bordering it.</p>		
<p>Lack of Project Alternatives</p>	<p>↑ I150-14b</p>	<p>I150-14 Noise is addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to Master Response 4. Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to Master Response 7.</p>
<p>The EIR propose a "reduced" option of 825 units that does little to mitigate any of the impacts to transportation, traffic, community charter, noise, or public services. The EIR states that the impact from this would be "slight" which means it's not truly a thoughtful alternative</p>		
<p>A better reduced project alternative would be a modest project consisting of 200-300 single family and attached homes, with 15% of the homes categorized as, "affordable housing." This would further San Diego's goal of increasing housing supply as well as mitigate most of the impacts outlined above.</p>	<p>↑ I150-15</p>	<p>I150-14a Refer to Response to Comment I150-14. It is the City's position that compliance with the San Diego Municipal Code regulations pertaining to construction noise would ensure construction noise impacts would be less than significant. The ongoing pandemic does not alter that analysis.</p>
<p>Examples of a such projects that could be used to model this alternative would include "The Farms" in Poway, located ~5 miles north of the proposed project in Carmel Mountain Ranch. In 2017 Poway Voters rejected the 180-condo development proposal for the land that was Stoneridge golf course. But in 2020 they voted in favor of Measure P, which allows 160 homes to be built along with community gardens and attractions. This is an example of proposal the fits the community character of Carmel Mountain Ranch and would likely be applauded by the citizens. Looking further north to Escondido, at another defunct golf course, there are currently 380 homes being built on that site. The proposal of 1200 or 825 units is simply too dense for an infill project in a master planned suburb.</p>		
<p>In order to match the current community in terms of type of housing, as well as density (du/ac) as outlined in the community character section above, a reasonable development might have 30 low density residential units, 165 low-medium residential density units, and 65 medium density residential units. These units could include affordable units for both rent and purchase, as affordable home purchases remain unattainable for many potential buyers in San Diego. This type of development could be completed over 33 acres and match the current du/ac. Then the rest of the land could be converted to</p>	<p>↓ I150-14b</p>	<p>I150-14b Refer to Master Response 7 regarding air quality impacts and fugitive dust.</p>

open space, park land, and recreational space helping San Diego to reach its park and climate action goals.

Conclusion

In conclusion, we oppose this project because it will cause substantial environmental and community damage. The Project will result in the destruction of community character, loss the open space and parkland, increased wildfire risk, reduced air quality, and danger from increased traffic. Moreover, the EIR lacks adequate CEQA alternatives and admits to several unmitigable environmental impacts. We urge the city and developer to consider other project alternatives.

Thank you,
Kirsten & Jonathan Greer
Residents of 13823 Esprit Ave.

↑ I150-15
↓ Cont.

I150-15 Refer to **Master Response 10** regarding alternatives.

↑ I150-16
↓

I150-16 Comment noted.

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Comment Letter I151

Attention: E. Shearer-Nguyen, Environmental Planner
City of San Diego Development Services Center
1222 1st Avenue, MS 501, San Diego, CA 92101,
Project Name: Trails at Carmel Mountain Ranch
Project No. 652519 / SCH No. 2020039006

Via e-mail to DSDEAS@sandiego.gov.

Dear Ms. Shearer-Nguyen and City Council:

- Project Name – The Trails at Carmel Mountain Ranch
- Project Number 652519/SCH No. 2020039006.

My name is Mark Malamud, I am resident of Carmel Mountain Ranch for the past 30 years and original owner of the property on 11774 Windcrest Lane (Proposed Unit 8). Please see attached pictures for location of my property for the proposed project #652519. I purchased my property in the Carmel Mountain Ranch from Lyon Communities, who purchased an annexed property in August 1988 from original owner and developer of Carmel Mountain Ranch. This transaction was recorded in the County of San Diego (Please see document attached). I and all homeowners who purchased homes from Lyon Communities in the Carmel Mountain Ranch are successors of this document. I was provided this document by Lyon Communities at the time of my purchase. It clearly states in the section 7 “Golf Course Easement” that we, the homeowners have Equitable Servitudes bunding agreement with owners of the Golf Course. Also, it says Lyon Understand, Acknowledges and agree that **owning property adjacent to Golf Course is Beneficial and Highly desirable.**

This Easement runs with the land as long as the Golf Course Property is used as a Golf Course and this document does not say anything about future rezoning of Golf Course property from AR-1-1 zone and use land other that consistent with intended AR-1-1 zoning. According to this document rezoning from AR-1-1 and redevelopment of Golf Course land adjacent to Lyon Communities properties with other zoning is not allowed.

I did purchase my property on the same terms and benefits of Golf Course and 650 other homeowners in CMR did the same 30 years ago.

I totally understand that city of San Diego has shortage of housing units and especially Affordable housing but this project on this location of closed Carmel Mountain Ranch Golf Course “Trails at Carmel Mountain Ranch” that is been offered to city for review by developer New Urban West will not solve this problem at all, but instead will create Serious Significant Environmental Impacts in Catastrophic proportions what never could be repaired in our lifetime or our grandkids time in the Carmel Mountain Ranch Community and also to bordering communities Rancho Panasquitos, Sabre Springs , Rancho Bernardo and city of Poway.

Response to Comment Letter I151
151 Mark Malamud
No Date

- I151-1** The City acknowledges the comment as an introduction to comments that follow, and notes that it refers to a “Golf Course Easement” that disallows a rezoning of the golf course property. However, no such easement exists.
- I151-2** Comment noted.

I151-1

I151-2

*This Project brings up a lot of serious issues and concerns even from the city of San Diego that was noted in December 2020 EIR, Chapter 7 that need to be mitigated and also other unmitigable issues.

As you can see from attached project picture, my property location and proximity to proposed BMP 8 Basin next to my Custom Swimming Pool is raising serious concern for Health and Safety of my family.

My concern is as well for the road next to the BMP 8 Basin on other side that will create Noise, Green Gas Emissions, Bad Air Quality and Odor and this all will be in my backyard of my property. My property will be subjected to roads for cars on both sides of my property if this project gets approved and this totally not acceptable! Also, security and privacy issues for backyard and property fencing, because openness as a special design for golf course properties.

Wildfires are also huge concern. Last time we had evacuation order because of fire, took me 40 min to get to I-15 and I live just .25 miles away from it. All evacuation traffic was on Ted Williams Parkway as it only one way to get out of Poway fast to Rout 56 west. South and North bound of I-15 was close to traffic as Fires were in the Scrips Ranch and the Rancho Bernardo areas. The Unit 8 is located in a Very High Fire Hazard Severity Zone (FIGURE 5.19-1 EIR December 2020)

- Traffic issues in the area has not been correctly assed in EIR and should be restudy again as it contains severe mistakes. My concern is Unit 8 and Unit 2 (5.2-11 & 5.2-12 Transportation)

"Unit 8 (98 Townhomes): A full access unsignalized driveway is proposed on Shoal Creek Drive. General distribution of project trips from Unit 2 sends 59% north on Shoal Creek Drive to Rancho Carmel Drive and 41% south toward Ted Williams Parkway. The Unit 8 driveway will be designed to meet City sight distance and design standards."

"Unit 2 (87 Townhomes): A full access unsignalized driveway is proposed on Shoal Creek Drive. General distribution of project trips from Unit 2 sends 59% north on Shoal Creek Drive to Rancho Carmel Drive and 41% south toward Ted Williams Parkway. The Unit 2 driveway will be designed to meet City sight distance and design standards."

How about traffic % distribution from Unit 8, it is showing the same as for Unit 2???

This all numbers for traffic distribution are totally not correct and it has been supplied by a consultant of the developer to meet the city of San Diego threshold. About 70 %+ of traffic from both units (8&2) will go to south toward the Ted Williams Parkway and only 5% or less will go north on Shoal Creek Drive to Rancho Carmel Drive, 25%+ will go to Windcrest Lane as its short connection to CMR Commercial District. All this will add to traffic from Unit 1 and add up to already existing conditions today.

The Windcrest Lane is a major Traffic artery in the area as a shortcut between Carmel Mountain Road and Ted Williams Parkway and also for Emergency Vehicles assigned rout. Traffic already is a big issue on the Windcrest Lane and Shoal Creek Drive in the morning and after work hours. Sometimes in these hours it takes me 10 min to pull out of my driveway (before Covid –19)

This project would result in a significant impact and in inadequate emergency access to the area that will not meet City's Significance Determination Thresholds (2016a).

Other my concern is that proposed Unit 8 driveway and Unit 2 driveway is too close to adjacent streets Windcrest Lane, Stoney Gate, Capewood Lane and Royal Saint George Driveway/Gate.

I151-3

Refer to **Response to Comment 02-7** regarding public safety.

I151-3

With regard to safety issues associated with a stormwater basin, the impact area was addressed in Section 5.10, Hydrology, of the Draft EIR. Hydrology impacts were determined to be less than significant.

I151-4

Noise impacts are addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

I151-5

Greenhouse gas emission impacts are assessed in Section 5.7, Greenhouse Gas Emissions, and air quality impacts, including odors, are assessed in Section 5.3, Air Quality and Odor, of the Draft EIR. Greenhouse gas emissions and air quality impacts were determined to be less than significant. Refer to **Master Response 7** regarding air quality and **Master Response 8** regarding greenhouse gas emissions. The comment addresses subject areas, which received analysis in the Draft EIR.

I151-6

I151-4

Impacts associated with wildfires and emergency evacuation are assessed in Section 5.19, Wildfire, of the Draft EIR. Wildfire and emergency evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I151-7

I151-8

- I151-5** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Unit 2 and Unit 8 are located near each other. Thus, the trip distribution is the same since trips are expected to use the same routes to access both Units. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I151-6** Refer to **Response to Comment I151-5**.
- I151-7** Emergency access impacts are assessed in Section 5.2, Transportation and the provision of emergency service impacts are assessed in Section 5.14, Public Services and Facilities, of the Draft EIR. The Draft EIR concluded that emergency access and service impacts would be less than significant.
- I151-8** Transportation hazards, including driveway design, were addressed in Section 5.2, Transportation, of the Draft EIR. Transportation hazard impacts were determined to be less than significant.

The Shoal Creek Drive is connected to Pedestrian Bridge on south and is used daily for pedestrian School kids to walk to and from Shoal Creek Elementary School. All this extra projected traffic in the area of Shoal Creek Drive will expose kids to a greater danger.

As you know the Carmel Mountain Ranch community is located very close to the Los Penasquitos Canyon Preserve. In recent several years with more housing development on route 56 we as residents of the Carmel Mountain Ranch noticed birds, animals migrate to Golf Course Property as it has open space sanctuary and any housing developments on it will create Wildlife ecosystem disturbance and even endangered species could be extinct forever.

** Carmel Mountain Ranch (Rancho Carmel Community Plan) is the Master Planned Community with Community Plan Resolution Number R-261374 and Adoption of Resolution R-261375 on August 14, 1984 by Council of City of San Diego vote 7 to 0 (2 council members was not present). Page 2 of R-261375 (Please see attached public documents)

"That this Council hereby approves the amendments to that plan entitled RANCHO CARMEL COMMUNITY PLAN, by expanding the industrial area, reducing the number of residential units, adding a golf course, clustering the commercial uses and revising the circulation systems, a copy of which is on file in the office of the City Clerk as Document No, R 26137.4"

Here some history from Carmel Mountain Community Plan. Please take your time and read from the City of San Diego link below:

<https://www.sandiego.gov/sites/default/files/legacy//planning/community/profiles/pdf/cp/cpcmrfull.pdf>

"The 1981 Rancho Carmel Community Plan and accompanying EIR were approved March 16, 1981, and incorporated in the General Plan. The City next approved two planned development permits—a PID (Planned Industrial Development) for the northwestern industrial park, and a PCD (Planned Commercial Development) for the regional commercial center. By 1994, the commercial property was almost built out, and the northwestern Industrial Park was about 75 percent occupied. A Conditional Use Permit (CUP) for a golf course was approved; the course has been in use for a number of years.

A change of ownership in 1983 resulted in a re-evaluation of the 1981 Rancho Carmel Community Plan. As a result, revisions to the plan were proposed to respond to market and **environmental concerns**. The proposed changes included: an increase of industrial acreage, **a 25 percent reduction in residential units, an increase of open space and recreation areas** and a relocation of land uses to create a town center with an urban mixture of commercial and public uses. The community plan amendment was approved by the City Council in 1984.

The 1984 Carmel Mountain Ranch Plan replaced the 1981 Rancho Carmel Plan with a new plan more responsive to today's and tomorrow's concerns. Addressing the environmental concerns of the draft EIRs of 1976 and 1981, this Plan demonstrated sensitivity to impacts and incorporated those concerns into the guidelines for the Plan (see Community Environment, Design and Conservation Element).

Implementation of the 1984 plan again resulted in the need to make minor modifications to the community plan in 1988. Those changes included: relocation of the golf course clubhouse; the addition of a driving range per approved CUP #84-0114.I.; redesignation of 0.9 acres of neighborhood commercial

I151-9

I151-10

I151-11

I151-9

Section 13 of the LMA (Draft EIR Appendix C) states that the intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The LMA lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety. Refer to **Master Response 3** regarding proposed roadway improvements, which would be conditions of project approval, not mitigation measures. Proposed roadway improvements are also included in Chapter 3, Project Description, of the Draft EIR. The project would not increase hazards, due to a design feature or incompatible use, and impacts were determined to be less than significant in Section 5.2, Transportation/Circulation, of the Draft EIR.

I151-10

Impacts to special status wildlife species and wildlife corridors are addressed in Section 5.4, Biological Resources, of the Draft EIR. The Draft EIR determined the project would result in less than significant biological resource impacts with the implementation of mitigation.

I151-11

Comment noted.

use and 0.9 acres of golf course to create a new 1.8acre parcel for community commercial use (Unit 38); redesignation of the land use for Unit 4B from tourist commercial/hotel use to low-medium density residential use and redesignation of Unit 4A from low-medium residential use to neighborhood commercial. In addition, the 1988 Plan amendment included revision of the acreage, unit yield and boundary configuration of several parcels to conform to tentative or subdivision maps (see Tables 1 and 2). Final mapping of the parcels resulted in changes due to the inclusion of adjoining roads in the map boundaries, grading design and accurate survey information."

"Incorporation of the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole." Page 33

- The main reason why the 1984 Carmel Mountain Ranch Plan was replaced the 1981 Rancho Carmel Plan, because of EIR that did state about Significant impact in this area for extra population (residents) and other environmental concerns. It resulted in 25% reduction in residential units, an increase of open space and recreation areas.
- As an Environmental specialist for city of San Diego, please tell me what did changed in the Carmel Mountain Ranch from Environmental perspective from 1984 to 2021 that can allow new residential development in such proportions to increase density and population by 25%?

*Now in 2021, the Carmel Mountain Ranch Community has been totally built out as was projected by the Community Plan back in 1984 and any new housing developments on the Golf Course in the community will not fit with the current Community Plan or even with requested amendments by New Urban West or proposed mitigation with alternatives from EIR December 2020.

* Golf Course property is a part of our Community Plan and has been designated as Open Space Recreational area. This is truly Golf Course community which has 95% of all street names, named after Golf Courses and Golf Clubs around the world (just type any Carmel Mountain Ranch street with a tag "golf "in Google and see). One example is "Fairway Village" development on Stoney Gate Place that is located of Shoal Creek Drive right off Ted Williams Parkway. Each home on that street has 1.5 garage. Why 1.5 garage? Because is space to park Golf Cart.

- Neighborhood Character – The main reason all residents of Carmel Mountain Ranch moved here and as I did 30 years ago because of Master Planned Community with Community Plan that City of San Diego approved in 1984. The Carmel Mountain Ranch Partners the original owners of Carmel Mountain Ranch and same original owners of Golf Course opened in 1986 before all homes were built around it, did very good job in establishing this golf community in the marketing materials and advertisement of Golf Course as a community amenity and open space benefits for homeowners.
- The proposed project by the New Urban West, "The Trails at Carmel Mountain Ranch" with 1,200 new multi-family units on Golf Course property will create severe negative impacts on the community with loss of main benefit of Open Space for Carmel Mountain Ranch residents and for the City of San Diego.
- I am highly opposing "The Trails at Carmel Mountain Ranch" Project Number 652519 and any future housing developments on Carmel Mountain Golf Course property based on many reasons, to name few as it will result in Significant Environmental Impact in the areas of Land Use, Transportation /Circulation, Air Quality and Odor, Biological Recourses, Geologic

I151-11
Cont.

I151-12

I151-13

I151-14

I151-15

I151-16

I151-12 Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan or the Carmel Mountain Ranch Community Plan.

I151-13 Comment noted.

I151-14 Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** for more information.

I151-15 Refer to **Response to Comment 02-11a** regarding open space.

I151-16 Refer to **Responses to Comments I151-3** though **I151-15** regarding land use, traffic, air quality, biological resources, greenhouse gas emissions, noise, visual effects and neighborhood character, and wildfire hazards.

Geologic conditions were addressed in Section 5.6, Geological Conditions, of the Draft EIR. Geologic conditions impacts were determined to be less than significant. Public services and facilities were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Public services and facilities impacts were determined to be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6**. Public utilities were address in Section 5.15, Public Utilities, of the Draft EIR. Public utilities impacts were determined to be less than significant

Conditions, Wildlife, Green Gas Emissions , Noise, Public Services and Facilities, Public Utilities, Visual Effect and Neighborhood Character , Water Quality , Tribal Cultural Resources, Wildfires and most important is Health and Safety .

Any new developments in the Carmel Mountain Ranch Community that requires the Community Plan amendment with REZONE from AR-1-1 on the Golf Course property will result in altering Neighborhood Character and Significant Environmental Impacts in Catastrophic proportions what never could be repaired!!!

“ES.8.1 No Project/No Development Alternative Under the No Project/No Development Alternative, the project would not be implemented and the site would remain in its current condition.”

- The Golf Course Property should be used only as a Golf Course (9-18 hole), Open Space Parkland, Winery just to name few. Any Land use in consistency with AR-1-1 Zoning that will preserve Community Character, Wildlife, Biological Recourses, Tribal Cultural Resources and most important preserve Health and Safety of current residents of Carmel Mountain Ranch should be considered as an alternative.

Please consider my comments in your decision!

Thank You

Regards,

Mark Malamud

Carmel Mountain Ranch Homeowner

11774 Windcrest Lane

San Diego, Ca 92128

I151-16
Cont.

I151-17

with mitigation incorporated. Water quality was addressed in Section 5.18, Water Quality, of the Draft EIR. Water quality impacts were determined to be less than significant. Hydrology was addressed in in Section 5.10, Hydrology, of the Draft EIR. Hydrology impacts were determined to be less than significant. Tribal cultural resources were addressed in Section 5.16, Tribal Cultural Resources, of the Draft EIR. Tribal cultural resources impacts were determined to be less than significant with mitigation incorporated. Health and safety impacts were addressed in Section 5.8, Health and Safety, of the Draft EIR. Health and safety impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

I151-17 Refer to Response **to Comments I151-2** through **I151-16**.

Comment Letter I152

Response to Comment Letter I152

152 Kurt Carlson

February 7, 2021

February 7, 2021

City of San Diego Development Services Center
1222 1st Avenue, MS 501
San Diego, CA 92101

Attention: E. Shearer-Nguyen
Environmental Planner

Regarding: Comments on the Environmental Impact Report

Project: The Trails at Carmel Mountain Ranch
• Project No. 652519
• SCH No. 2020039006
• Community Plan Area: Carmel Mountain Ranch
• Council District: 5

Via e-mail to DSDEAS@sanidiego.gov.

Dear Ms. Shearer-Nguyen,

I would like to thank the Development Services Department for all their hard work on this Draft Environmental Impact Report (EIR) given the challenges of Covid-19, numerous other city projects, and the limited information being provided by the developer.

I have been part of the planning and building industry in San Diego for over 40 years. As a Landscape Architect for a successful and reputable planning and landscape architectural firm, and had the privilege and opportunity to work on many similar type projects. I have been a member of the CMR/Sabre Springs Community Council for many years as well. It has always been noticeable how the existing community's comments have always been respected, listened to, and used to play a key and pivotal role in projects being publicly acceptable and successful. As an involved citizen and 35-year Carmel Mountain Ranch resident, I attended every single public meeting, including the developer's community workshops.

The following are my comments to the recent draft EIR submittal that was reviewed by the City for the proposed project. My comments are not exhaustive but cover some of the following items: Project Alternatives, Project Objectives, Project Components, Tables, Impact Analysis, Project Consistency, Project Visibility and Contrast, Significance of Impact, Sensitive Wildlife and Wildlife Corridors and Habitat Linkages.

1. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	ES.8	ES.8 Project Alternatives	ES-6/28

Issue:

Reduced Density Alternative eliminates residences in Units 5 and 6 does not meet own 3 criteria items.

I152-1 Comment noted.

I152-2 Comment noted.

I152-3 The City acknowledges the comment and notes it is an introduction to comments which follow. Refer to **Response to Comments I152-4** through **I152-93** below.

I152-4 Refer to **Master Response 10** regarding alternatives.

I152-1
I152-2
I152-3
I152-4

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Page 2

Comment:

It is confusing that the selection of alternatives chosen in this EIR is governed by a so-called "rule of reason" (required to evaluate only those alternatives necessary to permit a reasoned choice). EIR needs to provide a more appropriate and reasonable rationale for an alternative that seeks to effectively mitigate the impacts and blend better with the project objectives, the current community plan and existing development. This is especially true since the focus of this analysis is to determine 3 items (1) whether the alternatives can avoid or substantially lessening the significant environmental effects of the project, (2) the feasibility of the alternatives, and (3) whether the alternatives meet all or most of the basic project objectives. EIR should be updated to include a Low-Density alternative, comparable to other North County San Diego golf course redevelopments.

2. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	ES.8	ES.8 Project Alternatives	ES-6/24

Issue:

Reduced Density Alternative. Other Project Alternatives.

In addition to a No Project Alternative, the EIR shall consider other alternatives that are determined through the environmental review process that would mitigate potentially significant environmental impacts. These alternatives must be discussed and/or defined with EAS staff prior to including them in the EIR.

Comment:

Reduced density alternative only analyzes 1 limited option. Another option to investigate is to propose 200 - 250 total 2-story single family detached and 2-story mixed units detached to reduce the number of impacts being made to community. Request doing this option and analyze how this option mitigates impacts. This potential option is currently being proposed on similar golf course infill projects such as Stoneridge Country Club, Poway, an agriculturally themed development of 159 units, a racquet club with two pools, meeting spaces and a 100-foot buffer from existing homes on three sides; and Escondido Golf Course - Three "villages" with 380 units, including 188 condos, constructed in two-story buildings in a neighborhood of single-family homes. Almost half the 109 acres are to be classified as open space, with landscaped buffer zones of between 50' and 200' feet between the new units and the existing houses built around the former golf course.

EIR should be updated to include a Low-Density alternative, such as: 200-250 total 2-story single family detached and 2-story mixed units detached, comparable to other North County San Diego golf course redevelopments.

3. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	ES.3	ES.8 Project Objective	ES-2

Issue:

Reduced Density Alternative. Other Project Alternatives.

Project Objective 7, section ES.3 not met - Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices,

I152-5 Refer to **Master Response 10** regarding alternatives.

I152-6 Refer to **Master Response 10** regarding alternatives.

I152-7 Refer to **Master Response 10** regarding alternatives.

I152-8 Refer to **Master Response 10** regarding alternatives.

I152-9 Refer to **Master Response 10** regarding alternatives.

I152-10 Refer to **Master Response 10** regarding alternatives.

I152-11 The comment serves as an introduction to comments which follow. Refer to **Response to Comment I152-12** through **I152-17** below.

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and performance standards to ensure that the project is cohesive and respectful of existing properties.

Comment:

Grading of project is not providing distinct and responsible separation of elevations between new development and existing as per CMR Community plan or City General Plan. The Trails is proposed to be an infill project with large multi-unit buildings 37' and 48' tall and only 50' away from existing 2 story single family detached homes. Height differences could be even greater depending on lot elevations and/or if an increased density is approved (i.e....Unit 9, from 300 to 453). As a simple comparison, the 3-4 story Jefferson Apartments have at least a dense 100' landscaped buffer and 40' grade separation from the condominiums at Windham and a 200' separation across the former fairway to the homes on Carmel Ridge Rd. Carmel Landing Apartments are purposely located at lower elevations away from single family homes on the east. Single family homes in Carmel Mountain Ranch that have a 50-foot or less rear separation in backyards are of an equal height and housing type and matching detached single family homes to detached single family homes. Proposed project also fails to meet current Landforms and Grading guidelines by CMR Community Plan that has always sought to provide a more aesthetically pleasing environment (see p. 67-74). EIR should study why only a minimal 50' setback is being provided adjacent to existing single-family homes with a totally different housing type when there are so many examples onsite of different buffering elements to utilize. EIR to be updated to request examples of variable setbacks from 75-100' that would mitigate extreme development being proposed and ensure that the project is cohesive and respectful of existing properties as desired by previous guidelines (CMR CP and City SD General Plan). EIR to also analyze why a lack of distinct buffer elements (such as separation of grades (slopes), berming, dense evergreen vegetation, walls and mimicking the terrain between new development and existing residential are not being provided, as established within the current CMR Community Plan for providing 'design capability' (see p. 75-80). These need to be demonstrated, illustrated accurately and shown in the design guidelines as well.

4. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	3.3	Project Components	3-1/86

Issue:

The project would develop distinct residential neighborhoods with a diversity of housing types and open space amenities and with a unique character and sense of place which would be accomplished through implementation of project-specific design guidelines.

Comment:

Project is not distinct, and guidelines are purposely developed to be only compatible with new development and not the existing community. Design guidelines need to keep buffers at variable 75-100' wide w/ first 50' specially at 100% densely planted evergreen plantings only and no vehicular or structural deviations within. All trails need to remain outside the first 50' buffer zone as possible next to existing residential with variable 25-50' of buffering. Proposed trails create safety, noise, security, and privacy issues to the existing backyards of over 650 single family detached homes in community. All residential buffers need to provide distinct grade separation, evergreen planting, berms, screens, walls and fencing as part of the total design elements to match the CMR Community plan (CMRCP), (see p.75, CMRCP). These elements are to be used for neighborhoods of contrasting densities (see p.79 & 80, CMRCP) and reinforce

I152-11
Cont.

I152-12

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I152-21

I152-12

The project proposes a 50' setback between proposed development and the existing community. Draft EIR Section 5.17, Visual Effects/Neighborhood Character analyzes the project's impacts on visual effects and neighborhood character. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Further, Section 5.1, Land Use, of the Draft EIR analyzes the proposed project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Specifically, Tables 5.1-2 and 5.1-3 provide a policy consistency determination and concluded the proposed project "would not conflict with the environmental principles, goals, and policies contained within the General Plan and Community Plan." Refer to **Master Response 1**. The comment addresses subject areas, which received analysis in the Draft EIR.

I152-13

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I152-14

Comment noted.

I152-15

Refer to **Response to Comments I152-12** and **Master Response 2**.

I152-16

Refer to **Response to Comments I152-12** and **Master Response 2**. The project will not result in a significant aesthetic impact, no mitigation is required.

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defensible neighborhood concepts (see p. 22, CMRCP). The EIR needs to be updated to show how eliminating these elements (indicated in the CMR Comm Plan) is an improvement for the quality of neighborhoods and creates a cohesive community that is respectful of existing properties.

5. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	3.3	Project Components	3-1/86

Issue:

Loss of Open Space and Park Land - The EIR suggests the Project will expand designated park land. EIR makes it seem like the Project is providing 111 acres of open space and parkland.

Comment:

The Project would actually result in the reduction of 52 acres of open space, plus another 40-50 acres of support space such as internal roadways, driveways, parking lots, common space, trash areas and trail development with deviations. The greatest amount of open space to be realized would be provided by the "no project alternative" in the EIR. EIR needs to recalculate analysis appropriately. The EIR clearly states: "The project site is designated Park, Open Space, and Recreation in the General Plan." (5.7-16). The City of San Diego General Plan states: "The General Plan is the foundation upon which all land use decisions in the City are based. The plan expresses a citywide vision and provides a comprehensive policy." The City of San Diego climate action plan establishes the protection of open space as an important goal: "Protect Open Space, Parks and Recreation Parks and open space are important resources that contribute to San Diego's culture, character, and economy." Green spaces also offer recreational and tourism opportunities. Open Space also serves as a climate change adaptation resource that alleviates the heat island effect and potentially reduce the impact of flooding."

EIR needs to be updated to acknowledge the total overall loss of open space and parkland and that the net loss is not an improvement.

6. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	3.3	Project Components	3-1/91

Issue:

Trails would range from 5 to 8 feet in width and all trails would be publicly accessible. Over 650 homes along the golf course have 'open style' V.I. fencing that was to provide a open space/view shed easement to the private golf course. If these trails are made for public access, they will create serious safety, security, privacy and noise issues.

Comment:

There are key buffer elements that have purposely been eliminated to cut project costs in favor of development (such as wider open space/LS buffer zones, separate grade elevations, CMU Walls and fencing). By doing this, the developer is not blending in with the existing community and creating issues that are detrimental to the adjacent homeowners. It is very important to ascertain noise levels to be mitigated along the backyards of these existing homes as a mitigative element for disturbing the safety, security, visual privacy, and noise issues. Elements should include such as: a 75'-100' vegetative evergreen buffer w/ substantial amount of trees and shrubs, Separate grade level change (20' minimum), 6' high architectural CMU wall. How

I152-17 Refer to **Response to Comment I152-16**. Also refer to **Response to Comment O2-13a** regarding buffers.

I152-18 The comment is an introduction to comments which follow. Refer to **Response to Comments I152-19** through **I152-22**, below.

I152-19 Refer to **Response to Comment O2-13a**, **Response to Comments I152-12**, **I152-13** and **I152-16**.

I152-20 Refer to **Response to Comment O2-13a** regarding buffers. Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety.

I152-21 Refer to **Response to Comments I152-12**, **I152-13**, **I152-16**, and **I152-20**.

I152-22 Consistency with the Carmel Mountain Ranch Community Plan is addressed in Section 5.1, Land Use (specifically, Table 5.2-3). Refer to **Master Response 1** and **Response to Comment I152-12**.

- I152-23** The City acknowledges the comment as an introduction to comments which follow. Refer to **Response to Comment I152-24** through **I152-26**, below.
- I152-24** To clarify, the project site is a former 18-hole golf course and is currently designated in the Carmel Mountain Ranch Community Plan as Private Recreation–Golf Course, and is not public open space. Refer to **Response to Comment O2-11a** regarding open space.
- I152-25** Regarding the project's consistency with the General Plan, refer to **Response to Comment I152-12** and **Master Response 1**. Greenhouse gas emissions and flooding are discussed in the Draft EIR in Sections 5.7, Greenhouse Gas Emissions, and 5.10, Hydrology, respectively. Greenhouse gas emissions and hydrology impacts were determined to be less than significant. Also refer to **Master Response 8** regarding greenhouse gas emissions.
- I152-26** Refer to **Response to Comment O2-11a** regarding parks and open space.
- I152-27** The comment serves as an introduction to comments which follow. Refer to **Response to Comments I152-28** through **I152-31**, below.
- I152-28** Refer to **Response to Comments I152-12, I152-13, and I152-16**.
- I152-29** Noise impacts were analyzed in Section 5.11, Noise of the Draft EIR. The analysis concluded the project would result in less than significant impacts with the implementation of mitigation. Refer to **Master Response 4**.

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many dBs can these elements mitigate? Please address and update the EIR on how the safety, security and privacy issues can be mitigated with these elements.
Also update to include how the EIR is analyzing the current safety, security, and privacy of the 650 homes if the back yards now become publicly accessible?

7. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Impact Analysis	5.13/91

Issue:

Issue 2: Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

Comment:

The design of this residential development is adversely affecting surrounding land uses and topography. The new residential site planning is insensitive to the existing residential and natural environmental concerns. It needs to establish a sense of safe neighborhood design by the use of physical transitions, natural or created, by separation of internal circulation patterns. Buffers being proposed are not detailed enough and do not explain what buffers are to be, such as separation of grades (slopes), berming, dense evergreen vegetation, walls, fencing. This is needed as a means of demonstrating and reinforcing the concept of defensible neighborhoods. EIR needs to review grading plans and 'marked up' developers Design guidelines by CMR CPG to understand the totality of site and community impact issues not being addressed or mitigated for. EIR needs to include a detailed site development plans for all Units (roadways, parking, trash, driveways, etc...) so an accurate analysis (and not interpreted) and review can be provided.

8. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1.3	Project Objectives	5.1-18/641

Issue:

The following are one the goals and objectives of the project that are not viewed as being met by the local CPG:

Ensure that new housing fosters a sense of community through architectural design using features that promote community interaction. This will enable growth to be accommodated throughout the City without adversely impacting existing neighborhood character.

Comment:

The current developer NUVV, has failed to get any concessions, agreements or approvals from the existing CMR CPG and/or community on its proposed plans and design guidelines. The EIR should review and be updated to include the Carmel Mountain Ranch's position letter submitted to Mr. Jeff Peterson, Project Manager in the City of San Diego Development Services (dated 07/15/20).

9. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1.3	Project Consistency	5.1-18/228

I152-30 Refer to **Response to Comment O2-7** regarding public safety. Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.

I152-31 Refer to **Response to Comment O2-7** regarding public safety.

I152-32 The comment is an introduction to comments which follow. Refer to **Response to Comments I152-33** and **I152-34**, below.

I152-33 Refer to **Response to Comments I152-12, I152-13** and **I152-16**.

I152-34 The Draft EIR evaluated the environmental impacts of the project as described in Chapter 3, Project Description, and as governed by the Master Planned Development Permit and associated Design Guidelines. Refer to Section 3.0, Project Description, of the Draft EIR, which provides a summary of the proposed land uses and a Conceptual Site Plan. The project also includes Design Guidelines which prescribe the type and form of development to occur. Therefore, sufficiently detailed information has been provided to perform a thorough CEQA analysis. The project is also processing a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation. Refer to **Master Response 1**.

- I152-35** The project's consistency with the General Plan is analyzed in Section 5.1, Land Use and specifically Table 5.1-2. The Draft EIR determined the project would not conflict with this policy for the reasons explained the consistency analysis related to Housing Element Goal 1 (see Draft EIR page 5.1-105). Refer to **Master Response 1**.
- I152-36** Comment noted. With respect to the implication that the project does not conform to the Carmel Mountain Ranch Community Plan, refer to **Master Response 1** and **Response to Comment I152-12**.
- I152-37** Refer to **Master Response 1** and **Response to Comment I152-12**.

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Issue:

Project is not Consistent with Carmel Mountain Ranch Community Plan Goals

Comment:

The Carmel Mountain Ranch Community Plan is considered the ultimate framework upon which all the land use decisions and conformance by the City are decided. It asserts a city adopted concept and comprehensive policy as the standard to go by. It states that the protection of Parks, Recreation and Open Space are important resources that highly contribute to San Diego's culture, character, and economy. The current EIR adopted was for 7,185 dwelling units, 14,000 resident population and 7,100 employment opportunities. This project does not meet the existing criteria for protecting open space and thus has a negative effect on the community of CMR's culture and character.

How can it be acceptable to change these well thought out CMR design guidelines to add housing senselessly? If this project were analyzed to the current guidelines and general plan, it would fail! It is very dishonest to change the rules of the game just to insert housing without any sensitivity or logical/rational thought!

EIR should analyze actual impacts regardless of proposed guideline changes and amendments so that honest and actual impacts can be realized. A potential increase of over 3,500 more residents needs to be analyzed in EIR and take into account the 1981 Rancho Carmel Community Plan and accompanying EIR (approved March 16, 1981), amendments as well as the 1984 CMR Plan, that was indicated as more responsive to tomorrow's concerns. The golf course was deemed a recreational and visual open space amenity which this was adopted as a community goal to meet the needs of and desires of users through numerous workshops and community meetings. The current developer NUW, has failed to try to get any concessions, agreements, or approvals from the existing CMR CPG and/or community on its current plans and design guidelines.

Project does not adequately address reduction in open space, public park space, etc.. EIR needs to be updated to indicate how and why this project is inconsistent with Community Plan Goals.

10. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1.2	Issue 6	5.1-16/124

Issue:

Issue 6: Would the Project result in the exposure of sensitive receptors due to current or future noise levels, which exceed standards established in the Noise Element of the General Plan? The project's land uses would be compatible with Table 5.1-1, City of San Diego Land Use – Noise Compatibility Guidelines, therefore, impacts would be less than significant.

Comment:

Disagree less than significant impact for issue 6. EIR needs to include more comparative studies that analyzes noise level differences between the existing 2 story detached single family home backyard mitigation option vs. a proposed 3-4 story apartment tower with roadways and parking lots that are only 50' away from existing homes. Also an option should include the Reduced Alternative option as well which shows an increase at Unit 9 (from 300 to 453 units).

I152-38 To the extent the comment indicates the project results in aesthetic and/or land use impacts, refer to **Response to Comments I152-12, I152-13 and I152-16**, above.

I152-39 Refer to **Response to Comments I152-12, I152-13, and I152-16**, above. Also refer to **Master Response 2**.

I152-40 Refer to **Master Response 1** and **Response to Comment I152-12**. Refer to **Response to Comment O2-11a** regarding parks and open space.

I152-41 Refer to **Master Response 4** regarding noise. The comment is an introduction to comments which follow. Refer to **Response to Comments I152-42 through I152-44**.

I152-42 Table 5.1-1 provides the City's noise land use compatibility guidelines, which is copied from Table NE-3 of the General Plan Noise Element. As shown therein, single-family and multiple dwelling unit residential (i.e., 3-4 story apartments) have the same interior noise level standard of 45 A-weighted decibels (dBA). Further, as shown in Table 5.11-4, both single family and multi-family homes have the same threshold for determining noise impacts from traffic (i.e., roadway noise), therefore, the Draft EIR does consider noise from roadways in the analysis as requested by the comment. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

I152-43 Refer to **Master Response 4** regarding noise and **Master Response 10** regarding alternatives.

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EIR should include noise level analysis for single family residential units at 65 dBA per Table 5.1-1 as SFR units are located on both sides of each unit development area.

11. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1.2	Issue 6	5.1-16/124

Issue:

Issue 6: Would the Project result in the exposure of sensitive receptors due to current or future noise levels, which exceed standards established in the Noise Element of the General Plan? The project's land uses would be compatible with Table 5.1-1, City of San Diego Land Use – Noise Compatibility Guidelines, therefore, impacts would be less than significant.

Comment:

Disagree with EIR's less than significant impact comment for issue 6. EIR needs to include more comparative studies that analyzes noise level differences between the existing 2 story detached single family home backyard mitigation option vs. a proposed 3-4 story apartment tower with roadways and parking lots that are only 50' away from existing homes. Also an option should include the Reduced Alternative option as well which shows an increase at Unit 9 (from 300 to 453 units). EIR should include noise level analysis for single family residential units at 65 dBA per Table 5.1-1 as SFR units are located on both sides of each unit development area.

12. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	ES.8	Other Project Alternatives	ES.5/A

Issue:

EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2) is missing items that should be reviewed and part of analysis.

Comment:

A red-lined markup of the developer's guidelines for the Trails (version dated April 14, 2020) and a position letter (dated 07/15/20) were provided by the CMRSS/CC CPG to the City of San Diego Development Services Department and NUW developer. Also, no CMRSS/CC CPG meeting minutes references were provided as important community input and background information. However, this information was not part of the EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2). EIR should update and include and analyze these documents provided by the CMR/SS CC to the SD Planning Department in Appendix A.

13. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	3.3	Project Components	3-7/91

Issue:

Recreational Open Space - Approximately 111.0 acres of development would be composed of parkland, open space, and buffer area. This area includes approximately 6 miles of publicly accessible trails and 7.9 acres of publicly accessible parkland; 78.1 acres of open space; and 25.0 acres of buffer area.

I152-44 Refer to Sections 5.1, Land Use, and 5.11, Noise, of the Draft EIR, which analyzed the proposed project's noise impacts with respect to the City's Noise Ordinance and determined impacts would be mitigated to less than significant through implementation of mitigation measures **MM-NOI-1** through **MM-NOI-2**. Also refer to **Master Response 4**.

I152-45 Refer to **Response to Comments I152-40** through **I152-44**.

I152-46 Refer to **Response to Comment I152-36**.

I152-47 Refer to **Response to Comment O2-3e**.

I152-48 The comment serves as an introduction to comments which follow. Refer to **Response to Comment I152-49**.

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Comment:

The Community disagrees with developer's definition of "Open Space" to include the 25.02 acres of buffer zone and other odds and ends. Lots that are part of Units developed with housing are not open space but basically a functional amenity that should provide safety, security, noise protection and privacy. An acceptable and more common-sense approach is to only count as "Open Space" Units which will not have housing (63.2 acres). Units with clusters of 3 and 4 story multi-unit buildings with 50' of buffer from existing homes with no distinct grade change cannot be considered "Open Space". EIR should be updated to reflect open space and parks of 73.1 acres. Buffer areas within developed units account for the remainder of 37.9 acres

14. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Project Components	5.1/127

Issue:

Project's Inconsistency with City of San Diego's General Plan

Comment:

By eliminating pristine Open space and view sheds, project fails to meet main goal of General Plan which states " Purpose - To preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users". (See RE-3 of Recreational Element for General Plan and Figure RE-1 Community Plan Designated Open Space and Parks Map). The golf course is a dedicated visual recreational amenity for the community per the CMR Community Plan. EIR should be updated and show a detailed analysis to determine how project can furnish more open space and maintain existing view sheds for the existing residential neighborhoods located along the designated ridgeline homes of CMR.

15. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1.3	Project's Consistency	5.1-21/129

Issue:

The project says that a majority of the project site would be retained as recreation and open space. Open space uses would be composed of approximately 111.27 acres, which includes approximately 6 miles of publicly accessible trails and 9.79 acres of publicly accessible parkland.

Comment:

The project is attempting to hide the fact that there is a major loss of open space and recreational land. The developer is claiming of only developing 53.2 acres (32.3%) of the 164.54 acres of golf course, leaving a net reduction of 111.34 (or .27). The reality is that developer is actually developing 11 of the 18 holes (61% of the golf course) which is more like 100.37 acres of development. The 53.2 acres indicated by developer only accounts for the building floor plate. There is no precise site development plan so the EIR is only interpreting what can happen. There are no builder plans and do not account for any acreage that includes all the driveways, private roads, utilities, parking lots, walkways and private common space for units (such as playgrounds, recreation areas, pools, plazas, green space, etc). Also, the park acreage total is

I152-49 Refer to **Response to Comment 02-11a** regarding open space and **Response to Comment 02-13a** regarding buffers.

I152-50 Refer to **Master Response 1**.

I152-51 Refer to **Master Response 1** regarding General Plan consistency. Regarding the request to consider how the project can provide more open space, refer to **Master Response 10**. Refer to **Master Response 2** regarding alternatives.

I152-52 Refer to **Response to Comment 02-11a** regarding parks and open space.

I152-53 The Draft EIR evaluated the environmental impacts of the project as described in Chapter 3, Project Description, and as governed by the Master Planned Development Permit and associated Design Guidelines. Refer to Section 3.0, Project Description, of the Draft EIR, which provides a summary of the proposed land uses and a Conceptual Site Plan. The project also includes Design Guidelines which prescribe the type and form of development to occur. Therefore, sufficiently detailed information has been provided to perform a thorough CEQA analysis. The project is also processing a General Plan Amendment, Community Plan Amendment, Rezoning, Vesting Tentative Map, Master Planned Development Permit, Site Development Permit, and Easement Vacation. Refer to **Master Response 1**. Lastly, refer to **Response to Comment 02-11a** regarding open space.

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7.87 acres (not 9.79), so the park acreage need almost 2 more acres minimally. However, the point is (as indicated by the Planning Commissioners at project initiation) that an "above the bar project" should allow for more recreational open space. The EIR needs to update these facts and include in analysis for clarification.

16. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Table 5.1-2	5.1-86/194

Issue:

Preserve, protect and enhance the integrity and quality of existing parks, open space, and recreation programs citywide. Preserve, protect, and enrich natural, cultural, and historic resources that serve as recreation facilities.

Comment:

Project is creating a net reduction in Parks and Open Space for CMR as NUW is proposing developing over half of the 164-acre golf course or 11 of 18 holes (61%). Golf course is already designated as Parks and Recreational Open Space per the City's General plan. Project leaves a considerable amount of land unused, dormant, and blighted with a shortage of only 7.87 acres (not 9.79 as developer indicates in plans) of proposed park space dedicated to City to develop. Also, unit 7 park location is publicly inaccessible via ADA or by any emergency or maintenance vehicles. EIR needs to be updated and provide alternative location for better park site and increase in acreage. In addition, project reduces recreation space within CMR by 44%, so EIR should be corrected to indicate Policy RE-C.2 is inconsistent with policy.

17. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Table 5.1-2	5.1-84/192

Issue:

An equitable citywide distribution of and access to parks and recreation facilities. OP-1-1: This zone would be assigned to public parks on Units 7, 13, and 16 and would be designed in accordance with the City's General Development Plan public input process (p. 3-10).

Comment:

Disagree that project is providing an equitable citywide distribution of and access to parks and recreation facilities. One of the largest parks proposed, Lot 7, is totally inaccessible for ADA compliance or vehicles (maintenance and emergency) due to its elevation change. In addition, it has major visual/surveillance concerns that do not meet CPTED principles (<https://www.cpted.net/>) or goals for Recreational Element of the City's General plan (See RE-6 goals). There are many areas that are lots more accessible and community equitable for providing developed parks and recreation such as Lots 3, 5 and 9 that are more suitable to community. They are ADA accessible, closer, safer, and have better surveillance opportunities for police and public view. Developed neighborhood parks should not be placed on sloped, inaccessible, or "leftover" open space, as this is often discouraged in many community parks in San Diego. The EIR needs to be updated to consider alternative location for parks that provide improved access and safety that meet CPTED principles.

I152-54 Refer to **Response to Comment 05-3**, the application of the City's population-based park standard results in a requirement of approximately 6.62 acres of usable park acreage, which the project exceeds with 7.87 acres; therefore, impacts are appropriately determined to be less than significant.

I152-55 Refer to Response to **Comments I152-53** and **I152-54**.

I152-56 The comment serves as an introduction to comments which follow. Refer to **Response to Comments I152-12, I152-13** and **I152-24**.

I152-57 Refer to **Response to Comment 02-11a** regarding parks and open space.

I152-58 Refer to **Response to Comment I152-54**. Refer to **Response to Comment 02-11a** regarding open space.

I152-59 Unit 7 is accessible from Shoal Creek Drive. Relative to emergency access, the Draft EIR, Section 5.2 analyzed whether the project would result in inadequate emergency access. As discussed on pages 5.1-21 and 5.1-22, impacts were determined to be less than significant. Additionally, refer to **Master Response 3** for a discussion pertaining to ADA accessibility.

I152-60 Refer to **Master Response 1** regarding consistency with policies and **Response to Comment I152- Response to Comments I152-12, I152-13** and **I152-24**. Refer to **Master Response 10** regarding alternatives.

- I152-61** The comment serves as an introduction to comments which follow. Refer to **Response to Comments I152-61** through **I152-65**, below. Further, the Draft EIR, Section 5.1, Land Use, provides a General Plan consistency analysis in Table 5.1-2. As analyzed therein, the project was determined to be consistent with the General Plan. Refer to **Master Response 1**.
- I152-62** Refer to **Master Response 3** for a discussion pertaining to ADA accessibility. Also refer to **Response to Comments O5-3** regarding park acreages and **O2-11a** regarding open space.
- I152-63** With respect to Crime Prevention Through Environmental Design (CPTED) issues, the comment does not relate to physical effects on the environment, therefore, it is not an issue considered under CEQA and no further response is required. Regarding the project's conformance with general plan policies, the Draft EIR, Section 5.1, Land Use, provides a General Plan consistency analysis in Table 5.1-2. As analyzed therein, the project was determined to be consistent with the General Plan. Refer to **Master Response 1**.
- I152-64** Refer to **Master Response 3** regarding ADA accessibility and **Response to Comment O2-11a** regarding parks and open space.
- I152-65** Refer to **Master Response 10** regarding alternatives. Refer to **Response to Comment O2-7** regarding public safety.

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18. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Table 5.1-2	5.1-84/192

Issue:

An equitable citywide distribution of and access to parks and recreation facilities. OP-1-1: This zone would be assigned to public parks on Units 7, 13, and 16 and would be designed in accordance with the City's General Development Plan public input process (p. 3-10).

Comment:

Disagree that project is providing an equitable citywide distribution of and access to parks and recreation facilities. One of the largest parks proposed, Lot 7, is totally inaccessible for ADA compliance or vehicles (maintenance and emergency) due to its elevation change. In addition it has major visual/surveillance concerns that do not meet CPTED principles (<https://www.cpted.net/>) or goals for Recreational Element of the City's General plan (See RE-6 goals). There are many areas that are more accessible and community equitable for providing developed parks and recreation such as Lots 3, 5 and 9 that are more suitable to community. They are ADA accessible, closer, safer, and better surveillance opportunities for police and public view. Developed neighborhood parks should not be placed on sloped, inaccessible, or 'leftover' open space. EIR to be updated and provide for alternative locations for parks that are more suitable and provide improved access and safety.

I152-66

19. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Table 5.1-3	5.1-87/195

Issue:

Accessibility Goals - A park and recreation system that provides an equitable distribution of park and recreation facilities that are designed to accommodate the needs of a diverse population.

Comment:

The CMR golf course was constructed on steep hillsides making pedestrian/senior usage, ADA compliance, and bicycle travel a challenging exercise for all but the fittest with a elevation change of over 270' from Ridgeline homes to the recreation center. Additionally, the project's trails are proposed to be only 5-8 feet wide. They are to be partially constructed of decomposed granite that are non-sustainable and will erode constantly. Finally, people riding down the hills may be traveling at a high rate of speed making it hazardous for people. EIR should be updated to indicate Policy RE-D.6 is inconsistent with policy.

I152-67

I152-68

20. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1	Table 5.1-2	5.1-38/146

Issue:

Project's Consistency with City of San Diego's General Plan - item f. Provide adequate levels of lighting for pedestrian safety and comfort. This will be impossible along the publicly accessible trails.

I152-69

I152-66 Refer to **Response to Comments I152-61** through **I152-65**.

I152-67 The Draft EIR, Section 5.1, Land Use, provides a General Plan consistency analysis in Table 5.1-2. As analyzed therein, the project was determined to be consistent with the General Plan. Refer to **Master Response 1**.

I152-68 Refer to **Response to Comment O3-32**.

I152-69 The comment is an introduction to comments which follow. Refer to **Response to Comments I152-70** through **I152-75**. Further, the Draft EIR, Section 5.1, Land Use, provides a General Plan consistency analysis in Table 5.1-2. As analyzed therein, the project was determined to be consistent with the General Plan. Refer to **Master Response 1**.

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Comment:

Multi use trails are being developed by adapting golf cart paths which run adjacent to 650 existing homeowners' backyards. These trails are not safe, not ADA compliant or comfortable at all due to the 273' change of elevation throughout the hilly and sloped community from the TPA site. Trailheads and trails should be provided with adequate lighting for safety and security concerns; however, developer needs to mitigate for this by providing CMU walls for the existing 650 homes for privacy, sound, safety, and light shielding, so light does not shine into existing homes. Also, the proposed width of these trails is too narrow and create safety, security, noise and privacy issues for the existing homeowners. Multi-use trails need to be at least 12 to 14 feet wide to accommodate two-way traffic, a variety of users (hikers, walkers, runners, bikes and skateboarders) and be a minimum of 50' from existing homeowner fences for sound issues. The proposed 50' is minimal and needs to be variable from 75'-100' wide. This will also help accommodate wildlife corridors and habitat linkage as well (see Appendix, section 3.2.7, Wildlife Corridors and Habitat Linkages. The publicly accessible trail design also needs to meet the ADA slope limit of not being steeper than 5%, or up to 8% with handrails. The EIR should be updated to re-evaluate public trail locations, size, buffer zones and provide mitigation methods that address the community concerns for pedestrian safety and security at night-time, plus noise and privacy protection for all 650 existing homeowners along the golf course.

21. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.1-3	Table 5.1-3	5.1-123/231

Issue:

A multi-use trail system would circulate throughout the project site to provide mobility and recreational opportunities for pedestrians and bicyclists. The majority of the trail system would include paved trails that would be repurposed from the previous golf cart path, and new paved trails would provide connections through new development areas. Trails would range from 5 to 8 feet in width and all trails would be publicly accessible.

Comment:

The developers poorly planned trail systems are relying on narrow ex golf-cart paths that are on unusually steep, hilly terrain and are very unsafe and hazardous as shared use or multi-use trail system. The ex-golf-cart paths are not safe for Senior citizens/pedestrian usage or ADA compliant due to 273' change of elevation throughout project. Narrow trails would not be wise with skateboarders, bikes, hikers, runners, and pedestrians all using the same trail, especially on the downhill portions. The trails are not publicly accessible for pedestrians without major trail reconfiguration and switchbacks to maintain <5% slope. Also, typical standard width of Class I multi-use trail system is 12' clear paved path per City of San Diego Bicycle Master Plan (see p. 19). In fact, the CMR Community plan already specifies a 15' multi-use trail (see p. 49) existing in lower south portion of CMR development. The EIR should update their analysis and redistribute their report indicating the importance of providing more specific trail design standards that are sensitive and respond to community concerns for safety, security, visual privacy, noise, and sustainability.

22. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.17.3	Significance of Impact	5.17-15/569

I152-70 Refer to **Response to Comment I152-49, I152-67, I152-68, O2-11a** and **Master Response 3**.

I152-71 Refer to **Response to Comment O2-7** regarding public safety. Additionally, the Draft EIR analyzed impacts of light and glare in Section 5.17, Visual Effects/ Neighborhood Character. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Additionally, as discussed on Draft EIR pages 5.17-19 and 5.17-20 the project would be in conformance with the San Diego Municipal Code.

I152-72 Refer to **Master Response 3** regarding trails. Refer to **Response to Comment O2-7** regarding public safety. Refer to **Master Response 4** regarding noise.

I152-73 Wildlife corridors are addressed in Section 5.4, Biological Resources, of the Draft EIR. As described therein, "the project site is not within the designated MHPA and is not located within a designated key biological core and linkage area, as noted in the City's MSCP Subarea Plan (City of San Diego 1997)" (Draft EIR, 5.4-26). In addition, "the project site is mostly disturbed and is surrounded by existing residential development". As a result, the Draft EIR determined the project would have a less than significant impact on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan.

I152-74 Please refer to **Master Response 3** regarding ADA accessibility.

- I152-75** Refer to **Response to Comments I151-70** through **I152-74**.
- I152-76** Refer to **Response to Comment I152-70** through **I152-74** and **Master Response 3** regarding trails. The comment is an introduction to comments which follow. Refer to **Response to Comment I152-77**.
- I152-77** Refer to **Response to Comments I151-70** through **I152-74**. Also refer to **Master Response 3**.
- I152-78** The comment serves as an introduction to comments which follow. Refer to **Response to Comments I152-79** through **I152-82**. Also refer to **Master Response 2**.

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Issue:

Issue 2: Would the project result in the creation of a negative aesthetic site or project?

Comment:

The existing homeowners have had open space views since 1984. Any development of 3-4 story Apartment towers could not be any less negative since there has been no effort made to mitigate this option. The developer has only provided boiler-plate type sketches and picture characterizations of units. Also no detailed site development plans of the project showing any proposed building pads and roadways has been provided. Without these detailed development plans, analysis and interpretations by City and others may not be accurate. This lack of information minimizes the effects of the real impacts since a different builder will be constructing the buildings, thus further hiding significant information to truly analyze. An example would be headlights shining into the existing residential backyards from unknown internal roadways. This is so important in how it ultimately effects the future of the CMR community and evaluate the environmental impacts for the overall project, including the negative aesthetics. A precise site development plan will show these building pads, internal roadways, driveways, parking lots, common areas, utilities (trash enclosures, transformers) and need to be provided. The EIR should obtain the full site development plans from developer, re-evaluate the EIR analysis with these true plans, and update the report accordingly showing sensitive mitigative efforts that could be made.

23. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.17	Project Visibility and Contrast	5.17-17/571

Issue:

The project is not located in a highly visible area such as on a canyon edge or hilltop. While the southwestern portion of the project site is adjacent to I-15 and SR-56 is nearby, intervening terrain and vegetation partially screens the nearest areas of the project site from view. The majority of the project site is screened from view of interstate and state route motorists by intervening terrain, landscaping, and development. As such, the project site is not located in a highly visible area. Further and as previously discussed, development of the project site would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.

Comment:

Disagree! This project is highly visible for a minimum of 20% of the homes in CMR. The walls of 3-4 story homes will tower over the existing 2-story homes and block and eliminate precious community viewing resources and corridors, which include views of Mira Mesa, Rancho Penasquitos, downtown Poway, UTC, and the close surrounding hillsides of Mt Woodson, Iron Mountain and Black Mountain. Also, this development is not even close to creating a sense of neighborhood and/or providing any significant physical transitions and buffers between development and existing residential, therefore not reinforcing a key design rule for creating defensible distinct neighborhoods. (see Units with towering Clusters of 3 and 4 story multi-unit buildings crammed into cul-de-sacs on Units 1,2,7,9 and 10 that are immediately adjacent (50' buffer) to existing homes with no distinct grade changes are to be considered highly visible and not compliant with current CMR Community Plan. Developer needs to mitigate impacts by providing distinct grade changes, berming, dense vegetative evergreen landscape buffers, walls, and fencing. This needs to be analyzed and incorporated into impact analysis (see p. 62 Landform and View Analysis in CMR Community plan). EIR to be updated to indicate

I152-79 Refer to Response to **Comment I152-13** and **Master Response 2**.

I152-80 The Draft EIR includes a detailed project description in Section 3.0 of the Draft EIR, which provides for a summary of the proposed land uses and a Conceptual Site Plan. The project also includes Design Guidelines which prescribe the type and form of development to occur. Therefore, sufficiently detailed information has been provided to perform a thorough CEQA analysis. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I152-81 Refer to **Response to Comment I152-80**.

I152-82 The comment serves as an introduction to comments which follow. Refer to **Response to Comments I152-83** through **I152-86**.

I152-83 Refer to **Response to Comment I152-13** and **Master Response 2**.

I152-84 Refer to **Response to Comment I152-13**. The Draft EIR, Section 5.17, Visual Effects/ Neighborhood Character, analyzed the proposed projects visual effects. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I152-85 Refer to **Response to Comment I152-16**.

I152-86 Refer to **Response to Comments I152-83** through **I152-85**, as well as **Master Response 2** and **Master Response 10**.

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significant impact to existing CMR community within and include mitigations noted above between existing housing and proposed new development.

24. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
EIR	5.17	Project Visibility and Contrast	5.17-17/571

Issue:

The project is not located in a highly visible area such as on a canyon edge or hilltop. While the southwestern portion of the project site is adjacent to I-15 and SR-56 is nearby, intervening terrain and vegetation partially screens the nearest areas of the project site from view. The majority of the project site is screened from view of interstate and state route motorists by intervening terrain, landscaping, and development. As such, the project site is not located in a highly visible area. Further and as previously discussed, development of the project site would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage or architectural projections.

Comment:

This statement is untrue as this project is not only highly visible, but it blocks and eliminates precious community viewing resources and corridors that includes views of Mira Mesa, downtown Poway, UTC, Mt Woodson, Iron Mountain and the Black Mountain surrounding hillsides. Development is not even close to creating a sense of neighborhood and/or providing any significant physical transitions (grade changes) and buffers between development and existing residential, therefore not reinforcing a key design rule for creating defensible distinct neighborhoods. The developer is proposing to shoehorn apartments towers with clusters of 3 and 4 story multi-unit buildings stacked together into cul-de-sacs on Units 1,2,7,9 and 10 that are immediately adjacent (50' buffer) to existing backyards of golf course family homes. According to their grading plans, there are no distinct grade changes to help buffer these new neighborhoods. This has to be considered highly visible and not compliant with even the current CMR Community Plan. The developer needs to mitigate for these impacts by providing distinct grade changes, substantial berming, dense evergreen landscape buffers, and 6' tall CMU walls. This needs to be analyzed and incorporated into impact analysis (see p. 62 Landform and View Analysis in CMR Community plan). EIR to be updated to indicate significant impact to existing CMR community within and include these mitigative elements noted above for Project Visibility and Contrast issues between existing housing and proposed new development.

25. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
Appendix	3.2.6	Sensitive Wildlife	23/302

Issue:

In the Biological Resources, section 5.4, it was mentioned that of the total 18 wildlife species observed during the reconnaissance survey in July of 2019, only one (1) special-status and MSCP-covered species was observed: the coastal California gnatcatcher (*Polioptila californica californica*). This is definitely not the case for many years. Besides the reoccurring gnatcatcher (that has been spotted more frequently since the golf course closing, a nesting pair of Coopers Hawks have been present in the upper ridgeline homes (units 1, 9, 10 and 18) and have been ever present for the last 5-6 years and seen on a regular basis throughout these units as well as the community. We have photo documentation.

↑ I152-87
↓ Cont.

I152-88

I152-89

I152-87 Refer to **Response to Comments I152-83** through **I152-86**.

I152-88 The comment serves as an introduction to comments which follow. Refer to **Response to Comment I152-89**.

I152-89 Refer to **Response to Comment O3-8**.

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Comment:

The Cooper's hawk is a state Watch List and a MSCP covered species. It is also protected by the Federal Endangered Species Act and the Migratory Bird Treaty Act. The Migratory Bird Treaty Act prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, "take" is defined as "pursue, hunt, shoot, wound, kill trap, capture, or collect, or any attempt to carry out these activities" (16 USC 703 et seq.). According to the California ESA, it establishes state policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Under the California ESA, CDFW is responsible for maintaining a list of threatened species and endangered species (California Fish and Game Code, Section 2070). Several of these birds have steadily increased over the last 3 years since the course has closed and wildlife has been an amazing resource that should be protected and allowed to continue in our open space. Several community members have also spotted Red Tail Hawks frequently dwelling within our open spaces as well. The Coopers Hawk should be protected, and their locations are not listed in the EIR. The EIR needs to be updated to include the Cooper's Hawk and these other birds for the protection of our area's sensitive wildlife.

26. Document/ Appendix	Section	Subsection/ Paragraph/ Table-Figure	Pg/PDF
Appendix	3.2.7	Wildlife Corridors and Habitat Linkages	26/34

Issue:

These Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the immigration and emigration of animals throughout our community. These corridors contribute to Wildlife population viability by (1) assuring the continual exchange of genes between populations, which helps maintain genetic diversity; (2) providing access to adjacent habitat areas, representing additional territory for foraging and mating; (3) allowing for a greater carrying capacity; and (4) providing routes for colonization of habitat lands following local population extinctions or habitat recovery from ecological catastrophes (e.g., fires).

Comment:

In the report (p. 27), It mentions that "Chicarita Creek provides wildlife habitat and may support wildlife species movement; however, the upper limit of the creek and its associated habitat ends at the project site's northern boundary and therefore this part of the project site would be a dead end for wildlife movement. Wildlife could move between the habitat along the eastern boundary of the project site and the adjacent land just east of the project site, however this natural habitat is bounded on all sides by roads and residential development and therefore movement would be restricted".

This is not a true statement because as a community member who has lived, walked and golfed in this community for the last 35 years, the golf course/open space has served as a wildlife corridor for over 35 years for all kinds of animals and birdlife. It was originally explained by the past developer and previous EIR studies that this was intended to be a wildlife corridor at the outset of its planning. The corridor connected to Chicarita creek from the tunnel under the Interstate 15 linking Rancho Penasquitos Canyon to the valleys and canyons of Poway. All of the golf course's 650 residents have seen, heard and experienced the hawks, various bird species, ducks, cranes, blue herons and coyotes packs roving and flying between the fairways through the once green and now ignored open space that channels through the established community of CMR. The same occurs for all wild birds, skunks, possum and reptiles. This will still occur if trails are publicly accessible and needs more area than an engineered 50' buffer

I152-90 Refer to **Response to Comments I152-92** through **I152-93**.

I152-91 The comment serves as an introduction to comments which follow. Refer to **Response to Comments I152-92** through **I152-93**.

I152-92 Refer to **Response to Comment O2-49b**.

I152-93 Refer to **Response to Comment I152-92**.

I152-90

I152-91

I152-92

I152-93

EIR Comments
2/7/21
Page 15

band that the developer and future builders plan to deviate from to suite their own needs and not what's best for the community The EIR needs to address the protection of these Wildlife Corridors and Habitat Linkages and include a revised study to mitigate for and encourage variable buffer zones of 75-100' wide.

~~~~~  
To be honest, in all my years as a licensed professional working with communities and the public, I have never experienced this level of disappointing project non-transparency, the total disregard of the community's project requests and suggestions. In fact, even though it was requested time and again, the developer would not divulge any of their actual housing ideas, proposed density, or removal of open space until the 18th community meeting! (which happened to be right before their first city submittal).

We understand the current political environment and need for more housing. However, we are very disturbed and alarmed by the level of poor planning being displayed in proposing high density 3-4 story apartment towers being "shoe-horned" into a single-family neighborhood as a sensible and sustainable manner of planning. This type of apartment density should be located: a 'true' walkable half mile distance near commercial retail areas (shopping, food and services), distinctly separated and buffered from single family homes and closer to larger roadway arterials that can take the extra vehicle capacity. In this current pandemic it is becoming obvious that dead or dying retail areas would be much more ideal for introducing dense housing where the infrastructure is more suitable. Maybe its time for a CMR Community plan update, it's due.

This project process with the developer the last 20 months or so, has been consistently disappointing, uninspiring, unimaginative, and has purposely failed to appropriately relate with the community of Carmel Mountain Ranch's culture. Our community strongly urges the Development Services Department & the City of San Diego to address the numerous issues, planning concerns, and recommendations identified. One thing our community noted was that in the appendices, there was missing resources such as a community redlined design guidelines and position letter from our community planning group that outlined many issues the community had. As there are significant impacts from these and other comments, I would request that an updated Draft EIR be re-circulated.

Sincerely,  
Kurt W. Carlson,  
Landscape Architect  
CMR Community Council/Homeowner since 1986

I152-94      Comment noted.

I152-95      Comment noted.

↑ I152-93  
Cont.  
I152-94

I152-95

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Comment Letter I153

Response to Comment Letter I153

153 Leslie Wilson  
(No Date)

To: [DSDEAS@SanDiego.gov](mailto:DSDEAS@SanDiego.gov)

From: Leslie Wilson

12282 Cornwallis Square, San Diego, CA 92128 (Carmel Mountain Ranch Homeowner)

Re: Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

To Whom it May Concern,

I am writing due to my deep concern as a homeowner in Carmel Mountain Ranch since 2001. I have reviewed the EIR report related to the proposed project (The Trails at Carmel Mountain Ranch) and have significant concerns about the proposed project due to numerous reasons including non-mitigatable impacts on population, housing, transportation/traffic and public services.

**Significant impact that are not mitigable (ES-5)**

The EIR report itself states that “significant impacts related to transportation/traffic circulation, public services (libraries), and population and housing would remain significant and unavoidable. Additionally, cumulative impacts associated with transportation/traffic circulation and population and housing would be significant and unavoidable.” These significant impacts cannot be mitigated as described in the report. The areas impacted are vital to the community experience and should not be overlooked.

**Alternative Options ES-8.2):**

I strongly urge the city council to consider alternatives options, including the “no build” option that is noted in the EIR. As stated in the EIR “CEQA requires discussion of a No Project Alternative to give decision makers the ability to compare impacts of approving the project with those of not approving the project (Section 15126.6(e)).”

One option described in the EIR is a Reduced Density option. This option is deemed to only have a “slight” reduction in reduced population, housing and traffic impact so it was deemed that it should not be considered in the EIR. This makes absolutely no sense at all!

Reducing the population by almost a third **IS** significant and while it does not completely mitigate impacts it would reduce those areas that are significantly impacted (population, services, transportation, traffic). Furthermore, the thinking underlying the EIR conclusion that a reduced density option should not be considered and therefore the project as is should go forward, is flawed. If the goal is to only consider options that significantly mitigate the impacted areas, then their conclusion (that reduced density does not and should not be considered) leaves the city council with only one option...that a “No Project” alternative would be the only viable solution. Given this line of thinking, and on the basis that the EIR documents that there is no alternative that would successfully mitigate the impacted areas, I strongly encourage the city council to reject the project in it's entirety and maintain the AR 1-1 zoning.

I153-1

I153-2

I153-3

**I153-1**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Regarding public services, public services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6** regarding schools and libraries. The comment addresses subject areas, which received analysis in the Draft EIR.

**I153-2**

Comment noted.

**I153-3**

Comment noted. Refer to **Master Response 10** regarding alternatives.



Open Space/Parkland:

The current parcels are zoned AR-1-1: (Agriculture) which is consistent with the community master plan when Carmel Mountain Ranch was developed. Outside the current AR1-1 area, CMR has little open park space in comparison with surrounding communities. Taking away 52.9 acres of precious open space blatantly violates Senate bill 375 which requires California preserve open space and not build large housing projects on open space and park land. The project as proposed would have significant impact on air quality, fire risk, evacuation and cause harm to the current residents of CMR.

Conclusion:

I strongly urge a rejection of the project as designed. I believe that the project should be substantially downsized or rejected and AR 1-1 zoning maintained. It is important to note that a statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be to be significant and unmitigable identified in the EIR: ( Transportation/Circulation, Public Services (Libraries), Population and Housing) and I would be shocked if the city council would provide a statement of overriding consideration on an EIR that is deficient in many areas.

Please consider strongly the voices of the community that would be directly impacted by this project.

Respectfully,  
Leslie Wilson

I153-4

**I153-4** Refer to **Response to Comment 02-11a** regarding open space. Refer to **Response to Comment 01-11** regarding SB 375 consistency.

I153-5

**I153-5** Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I153-6

**I153-6** Comment noted.

Comment Letter I154

Response to Comment Letter I154  
154 Cindy Gorniak-Toor  
February 8, 2021

Attention: E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501, San Diego, CA 92101  
Project Name: Trails at Carmel Mountain Ranch  
Project No. 652519 / SCH No. 2020039006 Community  
Plan Area: Carmel Mountain Ranch  
Council District: 5

February 8, 2021

I154-1      The City acknowledges the comment as an introduction to comments that follow.

To City of San Diego, E. Shearer-Nguyen, et al,

Please find below my EIR concerns, discussions, discoveries and alternative to the best of my ability to comprehend the material and subject matter as layout in the DSD Environmental Report stated above.

It is not my intention to misrepresent any information provided and if any data is not correct it is only in error. If you find an error, I would ask that you not dismiss all my EIR concerns, discussions, discoveries and alternative and only that which is in error.

I hope you consider the information I have included and please free to contact me if you have any questions regarding the information I have provided.

Sincerely,

Cindy Gorniak-Toor

I154-1

| Topic area           | Issue                            | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Land Use             | Development on Unit 8            | There is a natural cooling of the air mass and a natural dropping of temperature linked to unit 8. This may be defined as a micro-climate or weather phenomenon as it is a natural occurring, constant, and at the same location. Building the planned 98 dwellings within unit 8 and adding impervious surface to over 95% of the valley floor in this area will interfere with the natural cooling of the air mass over this region and disrupt this naturally occurring weather phenomenon taking place.<br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area. And leave all habitat the lives and strives in this area to remain.</b><br>**Please refer to note 1 below for discovery and discussion. |
| Air Quality          | Development on Unit 8            | Any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location.<br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>**Please refer to note 1 below for discovery and discussion.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Biological resources | Development on Unit 8            | Development as proposed by NUW to add 98 dwellings and interfere with, alter and/or destroy over 95% of the natural habitat within unit 8. This area contains a unique deep valley setting with unique characteristics and unlike any other area this development is altering. As noted by NUW, Unit 8 is up to 20' below adjoining homes and all sites are sloped slightly to ensure drainage. This will alter the entire land surface. Further, any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location.<br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>**Please refer to note 1 below for discovery and discussion.            |
| Geologic Conditions  | Development on Unit 8 and Unit 2 | DSD EIR #652519 states there is a unique area of topsoil and very moist ground areas in findings but never mapped out. Also included in the EIR report is the relevance of the finding of topsoil. It should be determined if it is natural topsoil. "It takes time for topsoil to develop from the breakdown of organic matter (500-1000 years for 1-2 cms in some places).<br>Source: <a href="https://www.bettermeetsreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/">https://www.bettermeetsreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/</a><br>Also determine or rule out if the creation of topsoil is in direct correlation to the moist and very moist areas as mentioned previously and include all findings in the EIR.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area or interfere with the natural elements that may be attributing to the creation of topsoil and other natural soils and</b>                                                                                                                                                         |

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## I154-2

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan or the Carmel Mountain Ranch Community Plan. Impacts related to the addition of impervious surfaces are addressed in Sections 5.10 (Hydrology) and 5.18 (Water Quality), of the Draft EIR. The Draft EIR concluded the project's potential impacts would be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

## I154-3

Specific to air quality, the purported topic area, air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Additionally, refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

## I154-4

Impacts to biological resources, including natural habitat, are analyzed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated. Impacts associated with drainage patterns are analyzed in Section 5.10, Hydrology, of the Draft EIR. Hydrology impacts were determined to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

- I154-5** The determination as to whether natural topsoil occurs within the project site is not an issue or an impact area that is required to be analyzed under CEQA. It should be noted that impacts pertaining to soils and geologic conditions are addressed in Section 5.6, Geologic Conditions, of the Draft EIR. As explained therein, the project will not result in significant geologic impacts; refer to this section for additional information regarding soils. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

|                          |                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          |                                                                            | surfaces. Leave all elevations alone and protect the elements that are connected to the geological conditions.<br>**Please refer to note 1 below for discovery and discussion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Greenhouse Gas Emissions | Development on Unit 8                                                      | Extensive development in this area will cause increased and altered GGE and may alter the unique micro-climate weather phenomenon presented in this area. There are 98 dwellings planned along with the majority of land being turned into pervious surfaces. Further all vehicle traffic will be routed by development to the exact location that this weather phenomenon is being experienced. The ADT provided by NUW show 784 at the entry and exit points for unit 8. **Please refer to note 1 below for discovery and discussion of micro-climate weather phenomenon at unit 8. A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protected and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><br>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.                                                                  |
| Hydrology                | Development on Unit 8                                                      | DSD EIR #652519 stated they discovered moist and very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below and/or above ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR.<br><br>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.<br><br>**Please refer to note 1 below                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Land use                 | Development on Unit 1, 2, 8, 9 in relation to the Belle Fleur neighborhood | Disproportional and unfair placement of dwellings within Unit 1, 2, 8 and 9 as it relates to the residents of Belle Fleur.<br>This development will have a substantial direct impact on over 85% of residence in Belle Fleur. Approximately 85% of Belle Fleur properties share a common boundary with unit 1, 2, 8 and 9 that currently have a green belt open space adjacent to their homes. This development will see the majority of this green belt open space converted into multi-family multi-story dwellings and covered almost entirely with impervious surface. Over 99% of all homes in Belle Fleur that are adjacent to units 1, 2, 8 and 9 have iron fencing between them and the new dwellings. This will create a huge infringement on their peaceful enjoyment and privacy that the current green belt open space behind their homes now provides and has been in place for over 30 years.<br>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS, be on more main roads that are easier and faster to connect to by transit and near the largest area of open space within the development. |
| Land use                 | Development on Unit 1, 2, 8, 9 in relation to the Belle Fleur neighborhood | Disproportional and unfair placement of dwellings around the neighborhood of Belle Fleur. This development will have a substantial impact on over 85% of residence in Belle Fleur. More than 45% of all planned dwellings are going to be placed on the 4 units (unit 1, 2, 8 and 9) that share a common boundary with the residential properties. As planned Unit 1 – 66 Townhomes, Unit 2- 87 townhomes, Unit 8 – 98 Townhomes and Unit 9 – 300 Market Rate Apartments. That equates to 551 new dwellings going on one of the 4 units adjacent to Belle Fleur / 1200 overall units = 45.9%<br>Yet Belle Fleur will be left with the smallest amount of open space adjacent to its residential boundary. And the majority of this open space will consist of wetlands, steep slopes and difficult terrain. Little to no open space on unit 8 with removal of all green belt open space, little to no open space on unit 2 with removal of all green belt open space, and little to no open space on unit 1 with all green belt planned for removal. Highest number of dwellings planned for unit 9 and only a small area of wetland (refer to DSD EIR #652519) left as open space next to the Belle Fleur boundary. The Belle Fleur residents will experience the largest                                                                   |

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154-5  
Cont.

1154-6

Greenhouse gas emission impacts are analyzed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. Traffic related impacts are assessed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

1154-6

1154-7

1154-7

Hydrology impacts are assessed in Section 5.10, Hydrology, of the Draft EIR. The Draft EIR determined hydrology impacts to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

1154-8

1154-8

To the extent the comment raises concerns regarding open space, refer to **Response to Comment 02-11a**. Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use consistency. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received extensive analysis in the Draft EIR.

|                                       |                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       |                                                                                      | overall substantial impact in regards to number of new dwelling sharing their boundaries, the largest amount of removal and destruction of all green belt open space adjoining their boundaries and left the least amount of usable open space near their boundaries.<br><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS, near more main roads that are easier and faster to connect to by transit and near the largest area of open space within the development.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Visual Effects/Neighborhood Character | Development on unit 1, 2, 8, 9 in relation to the Belle Fleur neighborhood           | Currently there are zero open spaces or parks within the boundaries of Belle Fleur neighborhood. However, to compensate for this, 85% of properties in Belle Fleur have a direct view of the green belt open space from their backyards and another 12% having a partial view of the green belt open space from their properties. The NUW development plans to incorporate multi-story, multi-family dwellings along with impervious surface destroying over 87.5% of the land that makes up the green belt open space adjacent to the Belle Fleur homes. Of the area left and classified as open space by the development, it is mostly comprised of steep slopes, wetland or difficult terrain. This will be a substantial impact change for over 85% of homes in Belle Fleur that back on to the green belt open space and a somewhat impactful change for 12% of the homes in Belle Fleur with partial views of the green belt.<br><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS, on more main roads that are easier and faster to connect to by transit and near the largest area of open space within the development.</b>                                                                                                                                                                                    |
| Visual Effects/Neighborhood Character | Development on unit 1, 2, 8, 9 in relation to the Belle Fleur neighborhood           | This development plans to utilize the majority of area on unit 1, 2, 8 and 9 for dwellings and amenities for these dwellings and will have a substantial direct impact on over 85% of homes in Belle Fleur, yet no dwellings are planned to match the same real estate "characteristics as the homes in Belle Fleur." Characteristics of Belle Fleur homes are stand-alone single-family structures with front, side and backyards. All new dwellings planned by NUW that will share an adjoining boundary with Belle Fleur and have a substantial impact on over 85% of properties in Belle Fleur that have a direct view of new dwellings, will be multi-story, multi-family dwellings with square footage 1/2 to 1/3 the size surrounded by parking spaces, roadways and other impervious surfaces.<br><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit. Another alternative is a plan that includes dwellings that are single family dwellings with similar traits, minimize impervious surfaces, allow bigger buffer areas on unit 9 and preserve large areas of the green belt open space. Also allow natural settings where one can enjoy views of the valleys and mountain ranges over what use to be hole 18 and over unit 10.</b> |
| Traffic and Transportation            | Project Alt 1 and Alt 2<br>1200 multi-family dwellings<br>825 multi-family dwellings | Overall number of dwellings should be reduced so there is not a significant impact to CMR community.<br><b>Alternative reduce overall number of dwellings to be better aligned with community layout, CMR current masterplan while still allowing some areas to be developed for city planning agenda. Incorporate majority of dwellings closer to MTS, CMRSS Recreation Center and largest area of open space on unit 5 and unit 6. Consider an increase in percentage of Affordable Housing up to 30%. Therefore, consider an overall number of dwellings to be &lt;= 300 with number of affordable units being between 30-90 units. Unit 1= 0 units, Unit 2= 0 units, Unit 5&gt;=78 units, Unit 6= 128, Unit 8=0, and Unit 9, Unit 10, Unit 16 and Unit 17 reduced number of dwellings so total number of dwellings is &lt;= 300 dwellings. Consider remaining dwellings to be single-family with backyards, front yards and side yards. This will greatly be reducing ADT on the residential streets and will keep most traffic near freeways and on main connecting streets.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Population and Housing                | Project Alt 1 and Alt 2<br>1200 multi-family dwellings<br>new population est. 3180   | Overall number of dwellings should be reduced so there is not a significant impact to CMR community.<br><b>Alternative reduce overall number of dwellings and placement of dwellings to be better align with community layout and CMR current</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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154-8  
Cont.

1154-9

1154-10

1154-11

**1154-9**

Refer to **Response to Comment 02-11a** regarding open space. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

**1154-10**

Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

**1154-11**

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

|                 |                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 | 825 multi-family dwellings<br>new population est. 2186                                                                                       | masterplan while still allowing some areas to be developed for city planning agenda. Incorporate majority of dwellings closer to MTS, CMRSS Recreation Center and largest area of open space on unit 5 and unit 6. Consider an increase of affordable units up to 30% to better meet city agenda for housing. Consider an overall number of dwellings to be <= 300 with number of affordable units being between 30-90 units. Unit 1= 0 units, Unit 2= 0 units, Unit 5>=78 units, Unit 6>= 128, Unit 8=0, and Unit 9, Unit 10, Unit 16 and Unit 17 reduced number of dwellings so total number of dwellings is <= 300 dwellings. Incorporate single family dwellings with front yards, back yards and side yards throughout Units 9, 10, 16 and 17.<br>New Population 2.64/household for multi-family dwellings and 3.23/household for single-family dwells, new population estimate <=850.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Public services | Project Alt 1 and Alt 2<br>1200 multi-family dwellings<br>new population est. 3180<br>825 multi-family dwellings<br>new population est. 2186 | Introducing a substantial increase in population in CMR. This will cause the residence of CMR (current and future) to suffer reduced and limited essential resources. According to the DSD EIR this development will be declining to incorporate or consider any expansions of CMR's essential public service such as library, schools, and safety professional. Even though given either of the two alternatives they have provided CMR will see an increase in population of 2186 or 3180 residents. The population still is too high with both alternatives given.<br>Alternative reduce overall number of dwellings and placement of dwellings to be better align with community layout and CMR current masterplan while still allowing some areas to be developed for city planning agenda. Incorporate majority of dwellings closer to MTS, CMRSS Recreation Center and largest area of open space on unit 5 and unit 6. Consider an increase of affordable units up to 30% to better meet city agenda for housing. Consider an overall number of dwellings to be <= 300 with number of affordable units being between 30-90 units. Unit 1= 0 units, Unit 2= 0 units, Unit 5>=78 units, Unit 6>= 128, Unit 8=0, and Unit 9, Unit 10, Unit 16 and Unit 17 reduced number of dwellings so total number of dwellings is <= 300 dwellings. Incorporate single family dwellings with front yards, back yards and side yards throughout Units 9, 10, 16 and 17.<br>New Population 2.64/household for multi-family dwellings and 3.23/household for single-family dwells, new population estimate <=850. |

**\*\*Note 1**

I have observed an unusual weather trend in connection to unit 8. It was not documented in my first EIR correspondence back in April, 2020 as I have only discovered it after the fact.

Due to the pandemic, in late March, 2020, I started staying closer to home and took up walking around the Carmel Mountain Ranch community.

I have walked many different routes but one of my main routes is walking the entire perimeter of unit 8. I travel clock-wise from Boulton Avenue to Carmel Ridge Rd to Stoney Gate Pl to Shoal Creek Dr to Windcrest Lane and finally completing the circle back on Boulton Avenue. I walk this particular route on average 10 times/week in the early mornings between 6:30am-8:00am and/or late evenings between 6:30-9:30pm.

I observed as I approach the opening or valley view to unit 8, along the sidewalk on Shoal Creek Dr, I feel the air get colder and a drastic drop in the temperature. It remains at a cooler temperature until the boundary of the first house at the corner of Windcrest Lane.

I started recognizing a pattern of a constant drop in temperature at this precise location (see pictures) every single time I have traveled through this area.

I am no expert in weather patterns but there is definitely some form of unique micro-climate or weather phenomenon that is being caused naturally from the elements of unit 8.

154-11  
Cont.

I154-12

I154-13

**I154-12**

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Schools, libraries, and other public services and facilities were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Public service impacts were determined to be significant and unavoidable due to the impact on library facilities. Refer to **Master Response 6** regarding schools and libraries. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

**I154-13**

Comment noted.

I have walked through this location over 250 times within the past 6 months and every time this constant pattern of cooler surface air is present at this exact location on Shoal Creek Dr at the opening of the valley off of unit 8.

I would describe the drop in temperature as quite sudden and dramatic through this area. At the times I walk through this area, I can easily and physically detect the temperature change.

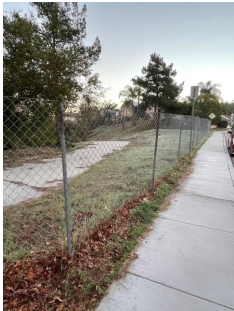
Due to climate change and all factors that are adding to global warming, I believe a full report should be made and documented to see what is causing this weather phenomenon at unit 8 and if in fact, we should do our best to preserve such a unique natural phenomenon.

The DSD EIR #652519 mentions unit 8 having moist and very moist areas that are not mapped. After this discovery, I believe that further inspection and mapping should take place. This should include instruments that may detect underground streams or other forms of moisture that could be associated to factors with this micro-climate weather phenomenon.

The DSD EIR #652519 also mentions unit 8 having an area of topsoil and other minerals in the soil that may also need to be taken into consideration as to a possible link to conditions associated with this weather phenomenon or micro-climate.

Unit 8 is a very unique area that presents a valley setting that will be permanently destroyed by this development. According to NUW, unit 8 is the only area that will be graded 20' below adjoining homes. Unit 8 is a beautiful deep valley and quite unique in location when compared to the other development areas.

Photo of location off unit 8 where the drop in temperature can be felt.



154-13  
Cont.



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Comment Letter I155

Response to Comment Letter I155  
155 Adam Szepkouski  
February 4, 2021

**From:** Adam Szepkouski <adam.szepkouski@bespokepartners.com>  
**Sent:** Thursday, February 4, 2021 12:55 PM  
**To:** DSD EAS <DSEAS@sanidgo.gov>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom this may concern,

I am in opposition of The Trails at CMR for several reasons. But most notably is the space the new buildings will occupy.

We live on the 16<sup>th</sup> hole. We have 2 young children and purchased our home ~3 years ago solely because of the openness/privacy open space the golf course provided for our growing family. As it stands today in the plans, there will be a 3 story building butting right up against our house (50 feet is close!) – taking away the precious space we sought when buying here...

Please don't take that away from us.

Thank you for your consideration of my comments,  
-Adam Szepkouski

12129 Eastbourne Rd.  
San Diego, CA 92128

 **Adam Szepkouski**  
Vice President of Talent | Bespoke Partners  
phone (858) 356-5638 mobile (860) 884-2484  
email adam.szepkouski@bespokepartners.com

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I155-1      Comment noted.

I155-1

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Comment Letter I156

Response to Comment Letter I156

156 Susan Green

February 4, 2021

I am one of the first occupants of CMR – moving in, in December 1987. I live near the golf course and work downtown. The addition of 1200 units, into this small community, will adversely impact my quality of life by both increasing traffic, increasing the number of people and their impact, and by also creating more visual “noise” in the form of multi-story housing.

This community was developed with density pre-my vote, to change that density all in the name of making more money for the City (taxes, etc..) and developer.

Stop this. The land should be kept free of high-more in HOA fees to ensure less housing, and more open space be retained.

Susan Green  
14951 Summerbreeze Way  
San Diego CA 92128

I156-1

I156-1

Traffic related impacts are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Analysis on visual character, scenic vistas, and project bulk and scale are provided in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Master Response 1** regarding density. The comment addresses subject areas, which received analysis in the Draft EIR.

I156-2

I156-2

To clarify, the project would establish an independent HOA, separate from any existing HOAs. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Establishment of an independent Master HOA is not a physical change to the environment.

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Comment Letter I157

**Response to Comment Letter I157**

**157 Halina and Jeff Tesar**

**February 6, 2021**

February 6, 2021

Halina & Jeff Tesar  
14351 Seabridge Lane  
San Diego, CA 92128-4223

Members of the Development Services Department,

After review of the Draft EIR for the Project: [Trails at Carmel Mountain Ranch, Project No.652519/SCH No.2020039006](#), I have concerns about the Draft EIR that will have a consequential impact on the residents of Carmel Mountain Ranch. As a longtime owner and resident of the property adjacent to Unit 1 of the golf course of the Carmel Mountain Ranch Community since October 1999, I have seen remarkable changes through the years that have been good for our community and some NOT so good. We rely on the City of San Diego to make decisions about changes that will protect us. Please review the following:

[1. Proposed Multi-Family Multi-story Construction is Not Compatible with Existing Homes](#)

**Project Objective 1, Section ES.3 not met – Provide multi-family housing units with range of housing types that are compatible with adjacent established residential communities.**

*~ The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to vehicle arterials and bus stops.*

I157-1

I157-2

**I157-1**

The City acknowledges the comment as an introduction to comments that follow.

**I157-2**

Impacts related to community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR, while impacts associated with land use consistency are addressed in Section 5.1, Land Use, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and community character. Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

In regard to housing types, a variety of building types (townhomes, garden walk-ups, stacked flats, and apartments, among others) would be provided in the community, with a mix of for-sale, rental and age-restricted product to serve a diverse and mixed population and household size. A variety of architectural styles would be allowed across the neighborhoods, so long as a consistency is established at each planning unit neighborhood to help define a sense of place. Therefore, the project would provide a variety of housing types, and therefore meets Project Objective 1. The comment addresses subject areas, which received analysis in the Draft EIR.

**This Project with 3-4 story Apartments towering over single family homes is definitely not compatible with the area. The Project as submitted in this Draft EIR does not meet the goals as described and negatively impacts of all residents of CMR Community.**

↑  
I157-2  
Cont.

**I157-3**

As discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR, the project was determined to comply with the City's Climate Action Plan, and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. The comment addresses a subject area, which received analysis in the Draft EIR.

## 2. Greenhouse Gas Emissions Unmitigated Greenhouse Gas Emissions Violate City and State Climate Action

Plans Greenhouse Gas Emissions, will be excessive due to the project exceeding Vehicle Miles Traveled guidelines established by the State of California. The City of San Diego has adopted its own climate action plan. Leaders will need to violate both City and State guidelines to initiate the Trails at CMR development. Global warming is a scientific fact. Nations are around the world now realize the we must make significant changes to prevent catastrophe. Continue to build in area that are car dependent is no longer an option. The new development, must change and become environmental responsible.

↑  
I157-3

**I157-4**

Impacts related to traffic are addressed in Section 5.2, Transportation, of the Draft EIR. Section 5 of the Local Mobility Analysis (Draft EIR Appendix C) describes the procedures used in assigning project traffic to the network. Existing cut-through traffic and its effect on roadway network operations is accounted for in the Local Mobility Analysis. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**Adding a large number of new residents with over 8000 average daily trips will not promote public health. It will create too much traffic for streets not designed for such a big crowd as well as it will add to air pollution which will then aggravate our existing allergies. Also, my concern is that The Unit I project is located at already busy intersection: Seabridge Lane and Windcrest Ln. Residents of this area already use Seabridge Ln as a short cut to go to the Ralph's shopping plaza which makes Seabridge Lane an extremely busy street.**

↑  
I157-4

## 3. 100-foot Buffers for Sensitive Areas Are Needed on All Project Perimeters

Project Objective 3, section ES.3 not met - Preserve the majority of the project site as open space, avoid areas of native vegetation or potentially suitable habitat for special-status plant species, and avoid areas of sensitive habitat including jurisdictional areas and their associated 100-foot buffers.

~ Proposed development should utilize those same 100' buffers for edge conditions adjacent to existing sensitive golf course homes. The 100' buffers with the trails are needed to provide for the health, safety, security, noise and privacy issues created by a 100% publicly accessed trail.

↑  
I157-5

**I157-5**

Air pollution impacts, as it pertaining to emissions from traffic, are addressed in Section 5.3, Air Quality of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

Regarding Project Objective 3, the project provides approximately 111.0 acres of development composed of parkland, open space, and buffer area. This area includes approximately 6 miles of publicly accessible trails and 7.87 acres of publicly accessible

My concern is that Carmel Mountain Ranch is rather small Community and eliminating the open space to create 100% publicly accessible walkways along existing see-through fencing will deprive residents of privacy, security, and safety. This free access to the public will potentially create criminal situations and endanger our lives.

I157-6

Thank you for considering my comments in review of the Draft EIR # 652519/SCH

Sincerely,

Halina Tesar

*Halina Tesar*

Jeff Tesar

*Jeff Tesar*

Justin Tesar

*Justin Tesar*

Nicole Tesar

*Nicole Tesar*

Jessica Tesar

*Jessica Tesar*

parkland; 78.1 acres of open space; and 25.0 acres of buffer area. Thus, a majority of the project site would consist of open space. In addition, the project would not impact any special status plant species or vegetation communities (refer to Section 5.4, Biological Resources). Thus, the project would meet Project Objective 3.

Noise impacts were addressed in Section 5.11, Noise, of the Draft EIR, and were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

**I157-6** Comment noted.



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Comment Letter I158

Anthony Lysek  
13627 Shoal Summit Dr.  
San Diego, CA 92128

Response to Environmental Impact Report  
Re: The Trails at Carmel Mountain Ranch  
Project Number 652519/SCH No. 2020039006

E. Shearer-Nguyen,  
Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501, San Diego, CA 92101

Sent Via e-mail to [DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

Dear Ms. Shearer-Nguyen and City Council:

After carefully reviewing the proposed Trails at Carmel Mountain Ranch development I am opposed to the development due the many negative impacts it will impose on the community in which I have been a resident homeowner for 23 years.

The Carmel Mountain Ranch community has been one of the most desirable communities in San Diego, as it provides all the necessary conveniences a typical resident desires like, schools, medical facilities, shopping and recreation. It is also unique in what it does not provide, congested roads, inadequate parking, excess noise and crime. The community is unique in it's ability to provide city conveniences with a peaceful quality of life and safety that is often lacking today within the city boundaries. I believe all of these qualities which have brought and kept homeowners here would be to a large degree destroyed by the proposed development for a number or reasons which I will address.

The proposed multi-family multi story construction is not compatible with the existing homes surrounding the development.

The project is comprised of all multi-unit buildings, while the impacted adjacent properties are nearly 100% single family residences. The project proposes no single family homes. In addition the proposed multi-unit buildings will be 3-4 stories high and about twice the height of existing homes. This completely changes the unique appeal of this community. Homeowners have paid a premium for the openness and views and lower density of being located on open space. Those advantages will all be taken away from hundreds of homeowners with significant negative impacts on their ability to enjoy the peace and tranquility that brought them here. This of course will make Carmel Mountain Ranch a much less desirable community to prospective homeowners as well, and have a negative impact on property values.

Project building types and setbacks are incompatible with the existing community plan.

Project Objective 7 section ES.3 requires the development is compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure the project is cohesive and respectful of existing properties. This would require primarily 2 story single family housing as currently exists in the community. In addition the 50 ft.

Response to Comment Letter I158  
158 Anthony Lysek  
No Date

- I158-1** The City acknowledges the comment as an introduction to comments that follow.
- I158-2** Impacts related to community character are addressed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- Impacts associated with land use consistency are addressed in Section 5.1, Land Use, of the Draft EIR. Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR. The project would not conflict with the goals, objectives, and recommendations of the City's General Plan or the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.
- I158-3** Refer to **Response to Comment I158-2** regarding community character. Impacts related to noise are addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment 02-7** regarding public safety.

I158-1

I158-2

I158-3

setback proposed is not in fact a true setback as deviations are allowed for roadways, trails and other land use that is not respectful to existing properties. There needs to be a much greater setback of perhaps 100 ft. to allow a net setback of 50 ft. after allowing for the planned use of the setback. Homeowner privacy, security and noise will all be negatively impacted by this development and so the project should be inclined to provide a substantial cushion in the setback rather than the minimum possible if respect for the current homeowners is a criteria.

VMT mitigations using bicycles on trails makes unrealistic assumptions and ignores the negative impacts.

There are two mitigation measures proposed an on site bicycle repair station and 600 short term bicycle parking spaces. Both of these proposals are not supported by the current level of bicycles utilized on Carmel Mountain streets. In addition it ignores the safety issues that would be created by having an 8 ft wide trail accommodate people on foot and bicycles at the same time. This is a problem even on straight paved paths one can witness along city beachfront paths that allow walkers and bicycles. They require constant law enforcement monitoring to mitigate the inevitable conflicts and safety issues that arise. This would be an even greater problem with a proposed trail of decomposed granite (not paved) on our sloping twisting terrain.

People do not bicycle in significant numbers and few walk due to the terrain and distance to reach any community services. I can tell you with certainty from observing my own neighbors that the majority of homeowners in my development of over 100 homes rarely ever walk or bike as means of transportation. When they do walk it is to walk their dogs or get some exercise. None of this replaces any vehicle usage. In reality people will primarily drive to everywhere they go in Carmel Mountain Ranch as they always have, and our roads and parking will be negatively impacted by the several thousand new vehicles in our community.

Safety and Privacy Issues Caused by Opening Trails to Public Access

The development plan fails to address the safety and privacy problems which will result from opening a public trail system in the development. Currently, the closed golf course is separated from single family homes by a metal fence. The traffic on the golf course was limited to those who were playing golf which greatly restricts the number of players that can be allowed on the course at one time. Once complete, the trail system will be open to the public and there will be no such restrictions. These fences will allow views into the golf course frontage homes at night. As a private area with no trespassing restrictions that has not been a major concern for residents. But once the grounds are open the public, it will provide access to homeowners back yards at all hours of the day and night. This will negatively impact the current homeowners privacy and safety.

Thank you for your consideration of homeowner concerns.

Sincerely,

Anthony Lysek  
Carmel Mountain Ranch Homeowner

I158-3  
Cont.

I158-4

I158-5

I158-4

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses a subject area, which received analysis in the Draft EIR.

I158-5

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety.

Comment Letter I159

**Response to Comment Letter I159**  
**159 Residents of Boulton Avenue, San Diego**  
**February 7, 2021**

This letter is submitted on behalf of the residents of:

**11687 Boulton Ave, San Diego**

Carmel Mountain Ranch in response to the proposed Trails at Carmel Mountain Ranch  
 Draft Environmental Impact Report.

**Environmental Impact Concerns for project Project No. 652519**  
**SCH No. 2020039006**

**SUBJECT: Trails at Carmel Mountain Ranch:**

I159-1

**I159-1**

The City acknowledges the comment as an introduction to comments that follow.

**I159-2**

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Impacts related to the addition of impervious surfaces are addressed in Sections 5.10 (Hydrology) and 5.18 (Water Quality), of the Draft EIR. The Draft EIR concluded the project's potential impacts would be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

| Topic area  | Issue                        | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Land Use    | Development on Unit <b>8</b> | There is a natural cooling of the air mass and a natural dropping of temperature linked to unit 8. This may be defined as a micro-climate or weather phenomenon as it is naturally occurring, it is constant and it occurring at the same location. Building 98 dwellings within unit 8 and adding impervious surface to over 95% of the alley floor in this area will interfere with the natural cooling of the air mass over this region and disrupt this naturally occurring weather phenomenon.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>***Please refer to note 1 below for discovery and discussion. |
| Air Quality | Development on Unit <b>8</b> | Any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location.<br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural</b>                                                                                                                                                                                                                                                                             |

I159-2

**I159-3**

Specific to air quality, the purported topic area, Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

I159-3

|                          |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          |                                  | air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.<br>**Please refer to note 1 below for discovery and discussion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Biological resources     | Development on Unit 8            | Development as proposed by NUW to add 98 dwellings and interfere with, alter and/or destroy over 95% of the natural habitat within unit 8. This area contains a unique deep valley setting with unique characteristics and unlike any other area this development is altering. As noted by NUW, Unit 8 is up to 20' below adjoining homes and all sites are sloped slightly to ensure drainage. Further, any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location.<br><br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>**Please refer to note 1 below for discovery and discussion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Geologic Conditions      | Development on Unit 8 and Unit 2 | DSD EIR #652519 stated there was a unique area of topsoil and very moist ground areas in findings but never mapped out. Further include in the EIR report the relevance of the finding topsoil and if it is natural topsoil. "It takes time for topsoil to develop from the breakdown of organic matter (500-1000 years for 1-2 cms in some places). Source: <a href="https://www.bettermexicoreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/">https://www.bettermexicoreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/</a><br>Also determine or rule out if the creation of topsoil is in direct correlation to the moist and very moist area as mentioned previously and include in EIR.<br><br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area or interfere with the natural elements that may be attributing to the creation of topsoil and other natural soils and surfaces. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area that may also be connected to the geological conditions.</b><br><b>**Please refer to note 1 below for discovery and discussion.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Greenhouse Gas Emissions | Development on Unit 8            | Extensive development in this area will cause increased and altered GGE and may alter the unique micro-climate weather phenomenon presented in this area. Further all vehicle traffic will be getting routed by development to the exact location that this weather phenomenon is being experienced. The ADT provided by NUW show 784 at the entry and exit points. **Please refer to note 1 below for discovery and discussion.<br><br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>DSD EIR #652519 stated they discovered very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>**Please refer to note 1 below |
| Hydrology                | Development on Unit 8            | DSD EIR #652519 stated they discovered very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>**Please refer to note 1 below                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

1159-3  
Cont.

1159-4

Impacts to biological resources, including natural habitat, are analyzed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated. Impacts associated with drainage patterns are analyzed in Section 5.10, Hydrology, of the Draft EIR. Hydrology impacts were determined to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

1159-4

1159-5

1159-5

The determination as to whether natural topsoil occurs within the project site is not an issue or an impact area that is required to be analyzed under CEQA. It should be noted that impacts pertaining to soils and geologic conditions are addressed in Section 5.6, Geologic Conditions, of the Draft EIR. As explained therein, the project will not result in significant geologic impacts; refer to this section for additional information regarding soils. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

1159-6

1159-7

1159-6

Greenhouse gas emission impacts are analyzed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

Traffic related impacts are assessed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Master Response 10** regarding the Draft EIR's

alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

- I159-7** Hydrology impacts are assessed in Section 5.10, Hydrology, of the Draft EIR. The Draft EIR determined hydrology impacts to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

|          |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Traffic  | Development on Unit 1, 2, 8 | Areas of traffic flow in and out of these areas are located at awkward locations in relations to the closest main street intersections Shoal Creek Dr, which will be impossible for residents to get out if developed in any situation of fire, flood or earth quakes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Land use | Development on Unit 8       | <p>DSD EIR #652519 stated they discovered very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR.</p> <p><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b></p> <p><b>**Please refer to note 1 below</b></p> <p>Disproportional and unfair placement of dwellings around the neighborhood of Belle Fleur. This development will have a substantial impact on over 85% of residence in Belle Fleur. More than 45% of all planned dwellings are going to be placed on the 4 units (unit 1, 2, 8 and 9) that share a common boundary with the residential properties. As planned Unit 1 – 66 Townhomes, Unit 2- 87 townhomes, Unit 8 – 98 Townhomes and Unit 9 – 300 Market Rate Apartments. That equates to 551 new dwellings going on one of the 4 units adjacent to Belle Fleur / 1200 overall units = 45.9%.</p> <p>Yet Belle Fleur will be left with the smallest amount of open space adjacent to its residential boundary. And the majority of this open space will consist of wetlands, steep slopes and difficult terrain. Little to no open space on unit 8 and all green belt open space planned for removal, little to no open space on unit 2 and, little to no open space on unit 1 and all green belt planned for removal and only a small area of wetland (refer to DSD EIR #652519) left as open space next to the Belle Fleur boundary on unit 9. So, the Belle Fleur residents will experience the largest overall substantial impact in regards to number of new dwelling sharing their boundary, removal and destruction of all green belt surrounding Belle Fleur and a minimum amount of planned open and usable new open space and parks next to or within its boundaries.</p> <p><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit.</b></p> |

I159-8

**I159-8**

Refer to **Response to Comment I159-6**.

I159-9

**I159-9**

Impacts pertaining to streams and wetland/ jurisdictional resources were analyzed and addressed in Section 5.4, Biological Resources, of the Draft EIR. It was determined that no direct or indirect impacts to wetlands, streams or jurisdictional resources would occur with project implementation. As discussed in Section 5.6, Geologic Conditions, and 5.10, Hydrology, of the Draft EIR, groundwater was encountered at depths of 7 to 32 feet on the project site. Section 5.10, Hydrology, of the Draft EIR, determined that the project would not result in decreased aquifer recharge or result in extraction from an aquifer. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

I159-10

**I159-10**

To the extent the comment raises concerns regarding open space, refer to Response to Comment O2-11a. Refer to **Master Response 1** regarding land use consistency. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

|                                        |                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Visual Effects/Neighbourhood Character | Development on unit 1, 2, 8, 9                         | 85% of Belle Fleur homes 85% have a green belt view from their backyards and another 12% having a partial green belt view from their properties. This development plans to incorporate multi-story, multi-family dwellings on over 85% of the land that makes up the green belt adjacent to the Belle Fleur homes. This will be a substantial change for over 85% of homes in Belle Fleur and a somewhat impactful change for 12% of the homes in Belle Fleur with partial views of green belt.<br><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit.</b><br><br>This development plans to utilize the majority of area on unit 1, 2, 8 and 9 for dwellings and amenities for these dwellings and will have a substantial direct impact on over 85% of homes in Belle Fleur, yet no dwellings in the plan to incorporate will match the same real estate classification as the homes in Belle Fleur. Characteristics of Belle Fleur homes are stand-alone single-family structures with front, side and backyards. Homes are approximately 2250-2550 square feet.<br><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit. Plan to include some family homes on unit 9 that match the real estate style and type.</b> |
| Public services                        | entire development impact on population and resources. | <b>Introducing a drastic increase in the CMR population yet continues to decline adding essential public services such as library, schools, and safety professionals.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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I159-11

**I159-11** Visual character was analyzed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

I159-12

**I159-12** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

**\*\*Note 1**

There is a weather phenomenon present at **unit 8**.

I walk around the entire perimeter of **unit 8** going from Boulton Ave heading towards the East, then I turn right onto Carmel Ridge, I take another right onto Stoney Peak Drive, and another right onto Shoal Creek. As I approach the opening or valley view to unit 8, the air gets colder and remain a cooler temperature until I am close to the first property on the corner of Shoal Creek and Windcrest Lane. I continue up Windcrest Ave until Boulton Ave, where I take another right and complete an entire circle around the perimeter of **unit 8**.

**There is a noticeable and constant drop in temperature at this precise location every time I travel through it.**

I am no expert in weather patterns but there is definitely some form of unique micro-climate or weather phenomenon that is caused by the properties of natural elements that are present at unit 8 and that is naturally causing a cooling of surface air in this location. I have walked through this

I159-13

**I159-13** Comment noted.



location for years and every time this constant pattern of cooler surface air is present at the same exact location.

The drop in temperature is quite sudden and dramatic and can be easily physically detected when one is present in this area.

**Due to climate change and all factors that are adding to global warming, I believe a full report should be made and documented to see what is causing this weather phenomenon at unit 8 and if in fact, we should do our best to preserve such a unique natural phenomenon.**

Further, I also came across part of the EIR that mentioned unit 8 had moist areas that were not mapped and I believe now that further inspection and mapping should take place. This should include instruments that may detect underground streams or other forms of moisture that could be a cause of effect of factors associated with this micro-climate weather phenomenon taking place.

The DSD EIR also mentioned unit 8 had an area of topsoil and other minerals in the soil that may also be taken into consideration as to a possible cause and/or effect of any conditions associated with a weather phenomenon or micro-climate.

**Unit 8 is a very unique area that presents a valley setting that will be permanently destroyed by this development. According to NUW, unit 8 is the only area that will be graded 20' below adjoining homes. Unit 8 is a beautiful deep valley and quite unique location when compared to the other development areas and we should seriously consider to preserve this area**

Further the exact location on the micro-climate weather phenomenon is where this development plans to have the vehicle access to unit 8 with 784 ADTs according to information provided by NUW.

748 ADTs will also add to green gas emissions and altering of the air in this location.

**\*\*Note 2, This was just once picture taken from our backyard which is facing Unit 8. Besides the Hawks, there are awls and all kinds of birds nest in this special narrow valley – uni**



**I159-14** Impacts related wildlife species and biological resources can be found in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated.

I159-13  
Cont.

I159-14

Comment Letter I160

From: aschroeder28@aol.com <aschroeder28@aol.com>  
Sent: Saturday, February 6, 2021 4:48 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

I believe that the EIR is deficient in the following area. The Project does not meet the objective to provide housing types that are compatible with the adjacent established residential communities.

The Project, as proposed, is not consistent with the community character of Carmel Mountain Ranch. The open space, natural features, and natural topography will be destroyed by grading the terrain and building a dense development into former open space. Much of that open space is located on narrow strips in between single and two-story homes.

Per the EIR, 3.2 Project Objectives and ES.3 Project Objectives "The following are the goals and objectives of the project: 1. Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities." And "7. Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure that the project is cohesive and respectful of existing properties." Also, in The Design Guidelines section of the EIR (page 95) it states that "The primary purpose and intent of the design guidelines is to provide guidance and direction on site planning, building design and landscape design to ensure that future development at the project site is of a high-quality and results in an attractive, safe and livable environment. Additionally, the design guidelines are intended to provide a framework for future project implementation and, as such, must be consistent with, support and implement the goals and policies of the Carmel Mountain Ranch Community Plan, City of San Diego General Plan and Climate Action Plan, by demonstrating how new development can be designed to be compatible with and sensitive to the existing surrounding community." I believe the proposed development of 1,200, three and four-story buildings is not consistent with the character of the surrounding single and two-story homes. I believe that a reduced density alternative would make more sense for this property.

Additionally, as stated in section ES.8.4 Environmentally Superior Alternative, "the environmentally superior alternative, would be the Reduced Density Alternative." Also, per EIR Table ES-1. Summary of Significant Environmental Impacts and Mitigation, "Population and Housing, The project would directly induce substantial population growth to the area based on the currently adopted Housing Element (City of San Diego 2013) and impacts would be potentially significant (Impact PH-1). No feasible mitigation measures. Impacts would be significant and unavoidable", therefore, I believe the reduced density alternative would lessen the significant impact to the community.

In summary, I feel that a more modest project consisting of 150-250 single family and attached, one and two-story homes, townhomes and buildings, with a percentage of the homes categorized as, 'affordable housing', would be more appropriate for this property.

Thank you for your consideration.

Adrienne Schroeder  
13779 Lindamere Lane  
San Diego, CA 92128

Response to Comment Letter I160

160 Adrienne Schroeder

February 7, 2021

- I 1160-1
- I 1160-2
- I 1160-3
- I 1160-4
- I 1160-5
- I160-1
- I160-2
- I160-3
- I160-4
- I160-5
- Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.
- Refer to **Response to Comment I160-1**. Additionally, refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan and the Community Plan.
- Refer to **Response to Comment I160-2**.
- Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Refer to **Master Response 10** regarding alternatives. The comment addresses subject areas, which received analysis in the Draft EIR.
- Comment noted.

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Comment Letter I161

Response to Comment Letter I161  
161 Stuart Fagan  
February 7, 2021

From: Stuart Fagan <sfagan@sfaganlaw.com>  
Sent: Saturday, February 6, 2021 2:54 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Ranch Project Number 652519/SCH No. 2020039006

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>  
> I'm opposed to the above-referenced project. The area already has enough traffic. Besides, just because you can build additional homes, it does not follow that you should.  
>  
> Sincerely,  
> Stuart E. Fagan, Esq.  
> (858) 220-9601  
>  
> Sent from my iPhone  
>

I161-1

**I161-1** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

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Comment Letter I162

**Response to Comment Letter I162**

162 Kathleen Harrington

February 8, 2021

-----Original Message-----

From: kathy harrington <kharrington24@yahoo.com>

Sent: Sunday, February 7, 2021 5:01 PM

To: DSD EAS <DSEAS@sanidiego.gov>

Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch

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Since the inception, 1986 of living at Carmel Mountain Ranch this has always been a friendly, safe, clean, peaceful, well maintained, walkability, with the golf course behind my house. Now the golf course has people using their motorcycles as a fun time next to our homes at 12 in the morning. Yet, the new project wants to open this to everyone not even who lives here. The traffic is now difficult with a daily traffic average of over 35,000. As a school teacher it has become more difficult to get to my class (not in Carmel Mountain) on time using the 15. Yet, The most important problem is how would I get out from a fire with all the thousands of extra people?

Sincerely,

Kathleen Harrington,

13968 Chicarita Creek Road, San Diego, CA, 92128 Sent from my iPad

I162-1

I162-2

I162-3

**I162-1**

Comment noted.

**I162-2**

Impacts associated with traffic were assessed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I162-2**

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

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Comment Letter I163

From: C wootton <wootton.clark@gmail.com>  
Sent: Sunday, February 7, 2021 2:37 PM  
To: DSD EAS <DSDEAS@sandiego.gov>; MarnivonWilpert@sandiegov  
Subject: [EXTERNAL] Ref Trails at Carmel Mountain Ranch Golf Course EIR Ref Project No. 652519 / State Clearinghouse No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and City Council member von Wilpert  
Ref Trails at Carmel Mountain Ranch Golf Course  
EIR Ref Project No. 652519 / State Clearinghouse No. 2020039006

Here are my comments to this project:

I am writing to you as a concerned citizen for preserving San Diego passive open space parkland, planting more tree canopies, (especially in areas where creeks provide some water), creating more cool zones and carbon sequestration, avoiding wildfires in San Diego, and helping to reduce climate change.

- 1)-Carmel Mountain Ranch is in a State-designated Very High Fire Severity Zone. Approximately 55 fires have burned within 5 miles of the project site since the beginning of the historical fire data record (Appendix D). This is of particular concern, especially during wind driven Santa Anna fires which could carry fire into the surrounding housing and preserved surrounding wild habitats.
- 2)-The traffic would be difficult for a fire evacuation. Ted Williams Park Parkway is already a parking lot during rush hour.
- 3)-The EIR appendix E states that the storm drain system will discharge into the Los Penasquitos Creek. The plan is to treat the on-site stormwater prior to discharging into the downstream systems. The project is on a floodplain, and due to climate destruction's atmospheric rivers, there is some additional concern about this location being paved over with the housing rather than keeping the golf course as open passive park land. See section 2-5 under Environmentally Sensitive Lands, P. 79 of 696.
- 4)-The project requires rezoning. It would be more economical to use abandoned retail or office space which can be made into housing since all the infrastructure is already there. Using existing infrastructure, build up can be much more affordable to create what is truly needed: affordable housing and walkable communities.
- 5)-The project is currently designated park, open space, and recreation in the city of San Diego general plan. This is how it should remain. This area could be incorporated into our park system which is vital to us now during climate change. We could use this to plant trees and other carbon sequestering, riparian plants to take advantage of the little water we do have. This would also improve SD air quality.
- 6)-The residents are opposed. The Project destroys the community character of Carmel Mountain Ranch.
- 7)-There are significant impacts to potentially breeding wildlife including 3 MSCP covered species Lee spells burial, coastal California gnatcatcher and Cooper's Hawk as well as yellow warblers. Although the EIR discusses the significant impacts during the construction and breeding of these species, it does not discuss effects at different times in the lifecycle of these covered species.
- Ref P. 32 of 696 Table ES-1. Summary of Significant Environmental Impacts and Mitigation"
- 8)-Carmel Mountain Ranch is a suburban development and infill is not appropriate for the suburban periphery of San Diego. It could be more appropriate to build a more modest project consisting of 150-250 single family and attached homes, with 15% of the homes categorized as, "affordable housing."

Thank you for considering my request.  
Regards, Cynthia Wootton  
7256 Jackson Drive  
San Diego CA 92119

Sent from my iPad

Response to Comment Letter I163

163 Cynthia Wootton

February 7, 2021

**I163-1** The City acknowledges the comment as an introduction to comments that follow.

**I163-2** Wildfire hazards are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**.

**I163-3** Emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were therefore determined to be less than significant. Refer to **Master Response 5**.

**I163-4** Impacts related to the addition of impervious surfaces can be found are addressed in Sections 5.10 (Hydrology) and 5.18 (Water Quality), of the Draft EIR. Hydrology and water quality impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

**I163-5** Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.



- I163-6** Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Refer to **Response to Comment O2-11a** regarding parks and open space.
- Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR, and impacts were determined to be less than significant. Refer to **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.
- I163-7** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I163-8** Impacts to special-status wildlife species are discussed in Section 5.4, Biological Resources, of the Draft EIR. No direct impacts to special-status wildlife species would occur with project implementation. Indirect impacts to these wildlife species would occur, but only if construction were to occur during breeding season. Mitigation measure **MM-BIO-1** was included to ensure potential impacts would be reduced to a less than significant level. Thus, the Draft EIR determined that the project would result in less than significant biological resource impacts with mitigation incorporated. The comment addresses a subject area, which received analysis in the Draft EIR.
- I163-9** Comment noted.

Comment Letter I164

**Response to Comment Letter I164**  
**164 David and Dagny Ferguson**  
**February 8, 2021**

From: Dave Ferguson <daveferguson858@gmail.com>  
 Sent: Monday, February 8, 2021 12:57 PM  
 To: DSD EAS <DSDEAS@sanidiego.gov>  
 Subject: [EXTERNAL] Project Name: Trails at Carmel Mountain Ranch. Project No. 652519/SCH No.20020039006;  
 Community Area: Carmel Mountain Ranch; Council District: 5

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

February 8, 2021

David S. Ferguson  
 Dagny V. Ferguson  
 14335 Seabridge Lane  
 San Diego, CA 92128-4221

Members of the Development Services Department,

After review of the Draft EIR for the Project: Trails at Carmel Mountain Ranch, Project No. 652515/SCH No 20200390, We have concerns about escape routes during wildfire season.

We moved to Carmel Mountain Ranch in 1991 and are aware of California wildfires over the years.

The worst on was in October 2007 where we saw flames coming over the hills towards our home. The Witch Creek Fire destroyed 1,650 structures. Killed 2 civilians. Burned 197,990 acres. My home faces unit 1 and is 3,000 feet from Interstate 15. It took me 90 minutes to exit the area.

The Local Mobility Analysis at pdf pages 47-70, and the entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs.

I164-1

I164-2

**I164-1** The City acknowledges the comment as an introduction to the comments that follow.

**I164-2** For clarification, the City notes that average daily trips and a level of service analysis, as well as the Local Mobility Assessment prepared for the project, are not for CEQA impact determination purposes. Rather, traffic from a CEQA perspective is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses a subject area, which received analysis in the Draft EIR.

The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes.

I 1164-3

**I164-3** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Thank you for considering our comments of the Draft EIR #652519/SCH.

I 1164-4

Respectfully,

**I164-4** Comment noted.

David and Dagny Ferguson

Comment Letter I165

From: Ruben Diaz Avalos <rdiaz@lji.org>  
Sent: Sunday, February 7, 2021 2:25 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Sirs,

I would like to submit an opinion about the projected development of housing in the Carmel Mountain Ranch area.

My concern is that as it is, we are already encroaching into the habitat of several animal species that, as we overtake their natural space, are being pushed into extinction, which would be an irreparable loss, as these native animals have taken cons to adapt to the harsh environment of the desert. As we develop housing in their habitat, we are also increasing the frequency of encounters in which, most of the time, are the animals that end up losing their lives.

There is no question that housing is a difficult problem in the San Diego area. I myself moved here a few years ago, and it was a time-costly challenge to find an appropriate house for my family, but it was no different or less affordable than in other parts of the country. It is clear to me that the community would be served better by not developing the housing proposed, as this will also increase the problems in an already overloaded infrastructure of services, highways, etc.

With best regards,

Ruben Diaz.

--  
\*\*\*\*\*  
Ruben Diaz Avalos, Ph.D.,  
Director of Electron Microscopy,  
La Jolla Institute for Immunology,  
9420 Athena Circle Dr.,  
La Jolla, CA 92037  
(858)752-6960  
\*\*\*\*\*

Response to Comment Letter I165  
165 Ruben Diaz Avalos  
February 7, 2021

- I165-1The City acknowledges the comment as an introduction to comments that follow.
- I165-2Impacts to biological resources were analyzed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated.
- I165-3Traffic is discussed in Section 5.2, Transportation/ Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

I165-1  
I165-2  
I165-3

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Comment Letter I166

From: Kathleen Hagenbach <khagen@att.net>  
Sent: Sunday, February 7, 2021 9:24 AM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Cc: Troy Daum <troy@wealthanalytics.com>  
Subject: [EXTERNAL] Trails@CMR # 652519/SCH

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and Council,

I have been a homeowner at Carmel Mountain Ranch since 1997 and would like to comment on the above project, which has, in addition to the above title, the number 2020039006.

Basically, I understand that housing development is a needed reality in San Diego, and am not opposed to it in general. I only object to the way the above project is being proposed, especially to its increase in density.

Carmel Mountain Ranch is mostly a single family community, and building a large amount of multi-level apartments would change the community character, especially the height and number of these proposed apartment buildings.

"Follow the science" is all the rage now, but what science would possibly conclude that a large increase in population would not negatively affect public services, such as schools, emergency response, police and fire departments? Wild fire evacuation itself would be impacted, to say nothing of individual house fire response time. More people per police officer and ambulance would also negatively impact 911 response time for police and emergencies. Schools would be more crowded.

I live on Carmel Ridge Road and already it is often a challenge trying to back out of my driveway, as many cars are heading down the street, going to Ted Williams and the freeway. What would hundreds more people do but make this worse and more dangerous for me? Most families, even apartment dwellers, have at least two cars per household, some with even more. Long gone are the days of the "family car."

I think your supposition that residents in these newly developed apartments would bike to work, to the grocery store, and to the public transit depot are based on what you WISH people would do, rather than what they actually DO! CMR is really hilly and difficult to bike on anyway. Please consider true human nature, rather than wishful thinking, when you estimate how people will act in their daily lives. They will drive everywhere and not take public transportation.

My suggestion is building single family one story homes. With an aging population, such homes are really hard to find and would be in great demand. The majority of single story homes now are located in expensive RB, where they are very old and almost all need lots of money for renovation. New single story homes in CMR would continue our community's pleasant character.

Please consider my remarks, as well as those of many of my neighbors who also have written to you.

Thank you for your time in reading my letter,

Kathleen Hagenbach  
13872 Carmel Ridge Road  
San Diego, CA 92128

Response to Comment Letter I166

166 Kathleen Hagenbach  
February 8, 2021

- I166-1** The City acknowledges the comment as an introduction to comments that follow.
- I166-2** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I166-3** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.
- Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- Police and fire protection services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police and fire protection services were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.
- I166-4** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and

evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

With regard to fire protection services response times, in accordance with the CEQA Guidelines, impacts related to public services and facilities (i.e., fire-rescue) are evaluated in light of whether the impact would result in a physical change to the environment. Response time deficiencies due to a lack of personnel or equipment can be helped only by continued, mandatory approval by the City Council of the affected department's budget proposal for operations within the affected area because individual development projects cannot be required to fund ongoing operational costs nor can individual development projects make budgetary decisions regarding such funding. The provision of adequate facilities are a planning and facility matter. As discussed in Section 5.14 of the Draft EIR, the project would not result in an increased demand for facilities associated with fire rescue through either the provision of new or physically altered facilities.

- I166-5** Refer to **Response to Comment I166-3** and **I166-4**.
- I166-6** Refer to **Response to Comment I166-3**.
- I166-7** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I166-8** Comment noted.
- I166-9** Comment noted.

Comment Letter I167

**From:** Jeremy Owens <jeremy@jeremyowens.com>  
**Sent:** Saturday, February 6, 2021 7:06 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch (Project Number: / 652519) - PLEASE DO NOT ALLOW

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

Dear sir or madam,

My name is Jeremy Owens and I live at 14896 Waverly Downs Way, San Diego, CA 92128. My wife Rachel and I have lived here in this same house for 25 years.

I would like to share my opinion regarding the old golf course being converted into 1,200 unit 2 and 3 story townhome and apartment rentals.

I am very much against The Trails at Carmel Mountain Ranch (Project Number: / 652519) being built in my community. Here are my reasons why:

1. Too big.

1,200 rentals would be about a 35% increase to this community. There are currently roughly 3,400 single family homes, apartments, and townhomes in CMR. This increase will overwhelm this area.

2. Fire evacuation.

Wildfire is a real threat to this area. Currently the fire evacuation plan calls for 1 1/2 hours to evacuate this area. The additional 35% increase is a real safety concern for me and my family.

2. Grocery shopping.

We currently have 4 grocery stores. Ralphps, Trader Joes, Target, and Costco. This increase will overwhelm our grocery stores. It's already hard enough to get into the shopping center parking lot.

3. Schools.

There are currently just 2 elementary schools in our community. This will certainly increase classroom sizes and affect the children's learning environment.

4. Hiking and Walking Trails.

The website for the Trails at Carmel Mountain Ranch explain that there will be 6 miles of walking and hiking trails. That sounds good, but my concern is for the 4 tunnels under the roads that connect all of these future trails. Without those tunnels you will not be able to get to the trails. Are they going to maintain these tunnels? It's been just a couple of years since the golf course went away and already some of those tunnels are showing signs of major disrepair and are possibly hazardous. The one at Highland Ranch that goes under Ted Williams is flooded with muddy stagnant water year round. Is there a plan to maintain these tunnels? If not then people will not be able to use these trails as you will not be able to navigate as they connect to each other.

Please do not let a business own and operate such a large part of my community. Of the 1,200 units proposed by the Trails project, 949 of them are rentals. I would be much more agreeable to a smaller scale project that includes more home ownership. A much better fit for this community would be a plan that adds single family homes and townhomes.

Thank you for your time.

Respectfully,

Jeremy Owens

Response to Comment Letter I167

167 Jeremy Owens  
 February 7, 2021

**I167-1** The City acknowledges the comment as an introduction to comments that follow.

**I167-2** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

**I167-3** Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I167-4** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Shopping is not a physical change to the environment.

**I167-5** Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

**I167-6** Refer to **Response to Comment O2-7** regarding public safety.

**I167-7** Comment noted.



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Comment Letter I168

From: David Wang <davidgwang123@outlook.com>  
Sent: Sunday, February 7, 2021 4:13 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] RE: Trails at Carmel Mountain in Ranch (Project No. 652519)

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Madam/Sir,  
I am writing to you in regards to the Project # 652519.

I am the owner of a property (13828 Esprit Ave) that the project has a direct impact. As an owner, I strongly oppose the project as it will worsen the traffic, especially the morning traffic when schools are open is already unbearable. Further, replacing the open field with houses will absolutely destroy the property value that represents the majority of my life savings and has been the single most important part of my retirement plan.

To summarize, I oppose the project in the strongest possible terms as it will significantly impact my life in a negative way.

Thank you in advance for your consideration.

Sincerely yours,

David Wang

I168-1

I168-2

I168-3

Response to Comment Letter I168

168 David Wang

February 7, 2021

**I168-1** Traffic impacts are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I168-2** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment.

**I168-3** Comment noted.

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Comment Letter I169

**From:** brittany daum <brittdaum22@gmail.com>  
**Sent:** Sunday, February 7, 2021 2:59 PM  
**To:** DSD EAS <DSDEAS@sandiego.gov>  
**Subject:** [EXTERNAL] EIR Response for The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

February 7, 2021

E. Shearer-Nguyen, Environmental Planner,  
 City of San Diego Development Services Center,  
 1222 1st Avenue, MS 501,  
 San Diego, CA 92101

Via e-mail to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov).

Dear Ms. Shearer-Nguyen and City Council,

My name is Brittany Anderson and I am a Carmel Mountain Ranch resident, currently living in the Cambridge community. I am writing to you to address the proposed Trails project in its current form. Presently, the proposed Trails at Carmel Mountain Ranch project should not be approved due to its significant impact on the safety of Carmel Mountain Ranch residents, as outlined below.

**Fire Evacuation Analysis Does Not Accurately Represent Project's Impacts:**

Carmel Mountain Ranch has been labeled by the state as a Very High Fire Severity Zone. As stated in the EIR, the proposed project is anticipated to add 7,928 average daily trips to and from the project site (Appendix G, p. 613). The wind-driven Santa Ana fires have the potential of burning thousands of acres in a few hours. Combining these already severe fire risks with the anticipated increase of vehicles on the road due to this project could cause clogged evacuation routes.

The Draft EIR states, that the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired by the Trails Project (pdf page 613-4). This illustrates the impact of approximately 3,180 additional residents and their vehicles has not been adequately studied, as there will be a significant impact on the San Diego County Emergency Operations Plan due to the increased number of residents on the roads of Carmel Mountain Ranch, I-15, and 56 highway. From past high wind-driven ember fires, mass evacuations were ordered. In circumstances like this where the evacuation plans have not been properly analyzed, clogged evacuation routes could cause a significant threat to the safety of Carmel Mountain Ranch residents.

The EIR needs to compile this data and add the additional impact of the new residents and their vehicles to their fire evacuation analysis in order to accurately assess the true threat of wildfires and clogged evacuation routes of this immense project.

Thank you for your consideration on this matter. I look forward to your response.

Respectfully,

Brittany Anderson  
 10614 Rancho Carmel Drive  
 San Diego, CA 92128

**Response to Comment Letter I169**

**169 Brittany Anderson**

**February 7, 2021**

**I169-1** Refer to **Response to Comment 02-7** regarding public safety.

**I169-2** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I169-1

I169-2

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Comment Letter I170

**From:** Brian Nielsen <brian\_nielsen@yahoo.com>  
**Sent:** Friday, February 5, 2021 4:14 PM  
**To:** DSD EAS <DSEAS@sanidiego.gov>  
**Cc:** Troy@WealthAnalytics.com <Troy@WealthAnalytics.com>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To Whom It May Concern,

As a homeowner in Carmel Mountain Ranch, I'm concerned about Project Number 652519/SCH No. 2020039006, The Trails at Carmel Mountain Ranch.

The Project will diminish the amount of green space in the neighborhood when Carmel Mountain Ranch is already below the city's average in terms of green space per housing units. Adding 1,200 condo, apartment, and townhome units will further aggravate this problem and destroy the aesthetics of the neighborhood.

I'm also concerned about the negative impact on the already crowded roads and school system. Adding 1,200 units will again aggravate this problem.

Finally, I've very concerned about the negative impact of fire evacuation routes due to the increase in traffic. Given the fire danger present in the Project area and the county, this has the potential of being a life and death issue.

Please give my concerns and the concerns of others in the neighborhood serious consideration when evaluating this Project.

Best regards,

Brian Nielsen  
 14805 Fox Hunt Ln  
 San Diego, CA 92128  
 858-602-6389

I I170-1

I I170-2

I I170-3

I I170-4

I I170-5

Response to Comment Letter I170

170 Brian Nielsen

February 5, 2021

**I170-1** The City acknowledges the comment as an introduction to comments that follow.

**I170-2** Refer to **Response to Comment O2-11a** regarding open space. Visual quality and character impacts are addressed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I170-3** Traffic was addressed in Sections 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I170-4** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I170-5** Comment noted.

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Comment Letter I171

From: Brenda Sappenfield <blsfield@gmail.com>  
Sent: Friday, February 5, 2021 11:24 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and San Diego City Council:

Thank you for the opportunity to comment on the proposed new project, The Trails at Carmel Mountain Ranch (the "Project"). Your decision will significantly impact many families in the Carmel Mountain Ranch (CMR) and other surrounding communities for generations to come, so we greatly appreciate your sincere and very serious consideration of the multiple complex issues, the grave impacts this Project will have and our community input.

In its current form, unfortunately the Project does not accomplish nor align with San Diego's and the community's goals and vision. It would destroy the unique and joyful character of the CMR community and will result in the loss of beautiful open space and parkland, increase the already consequential risk of wildfires (see more commentary on that below), negatively impact our ability to evacuate in an emergency, create more sprawl housing, markedly reduce air quality which will deteriorate our health, and also add to the already gridlocked traffic. Construction of 1,200 condos, apartments, and townhomes, and adding 3500+ more people, is totally inconsistent with the community character of Carmel Mountain Ranch. Not only does this Project destroy much of the green space (a loss of 52 acres of open space) and visual beauty we residents greatly enjoy, CMR is located in a State-designated Very High Fire Severity Zone. Building in very high fire severity zones is so dangerous that numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature.

Although technically located within the City of San Diego limits, Carmel Mountain Ranch is suburban development. Open space should not be converted to suburban sprawl development, and this is one of the largest sprawl developments in the past several decades in San Diego. The EIR states: "the proposed project would introduce a population beyond what is planned for the project site." The 1,200 proposed homes is much too excessive, resulting in overcrowding, reduced community quality, and high Vehicles miles travelled (VMT). Recently the state has attempted to reduce VMT with the passage of SB743, but this Project is not compliant with SB743 - it does the opposite and instead it creates large increases in traffic and VMT.

This Project also represents a major increase in air pollution and related damaging health effects. A large construction project of this nature occurring within a long-standing neighborhood like CMR would produce abundant air pollution and dust. Despite efforts to diminish it, significant fugitive dust from grading, hauling, conveying and loading will inevitably occur. Fugitive dust is carcinogenic and is implicated in various respiratory problems including COPD, asthma, emphysema, lung cancer and premature death. In addition, fugitive dust in San Diego County can induce valley fever that is also very harmful and potentially deadly. In addition to seniors and families, a lot of children live in CMR and this Project would likely be devastating to many people's health and quality of life.

Additionally, the Project produces a large increase in traffic, especially in the North County, and the EIR concludes that transportation impacts are unmitigatable. This is despite the fact that "Portions of the Project site are located within a Transit Priority Area (TPA) due to proximity to the Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit Station approximately 0.5 miles south of the Project Site." Traffic is often stopped on area roads and Freeways, and this compounds an already serious gridlock problem.

Response to Comment Letter I171  
171 Brenda Sappenfield  
February 5, 2021

- I171-1

The City acknowledges the comment as an introduction to comments that follow.
- I171-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Response to Comment O2-11a** regarding open space.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.



- I171-3** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.
- I171-4** Refer to **Response to Comment I171-2**. Impacts related to vehicle miles traveled are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR and impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I171-5** Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Section 5.3 of the Draft EIR also contains a discussion of the Health Risk Assessment prepared for the proposed project. Refer to **Master Response 7** regarding air quality impacts and Valley Fever.
- I171-6** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway

We residents of Carmel Mountain Ranch bought our homes under the impression that open space and green space would be a prominent feature of our community and lives. We had good reason to believe that green space would permanently characterize the community since the project site is designated Park, Open Space, and Recreation in the General Plan. We've already lost significant money via decreased home values due to the CMR golf course closure (especially those of us located right on the greens/holes), and adding sprawl housing will make this even worse.

In summary, and for a lot of important reasons, I will candidly say I *strongly* oppose the proposed Trails at Carmel Mountain Ranch Project. The so-called Reduced Density Alternative is not a real alternative, either - it reduces the size of the project by only 31% and most of the problems that accrue from the 1200 homes/townhouses are also present in this alternative. Their EIR admits the impacts of the so-called Reduced Density Alternative would be slight. The EIR understates the best alternative: "The No Project/No Development Alternative would have the fewest impacts." In fact it would have NO environmental, health, safety, traffic or other negative impacts.

Please take the time to seriously evaluate this proposed Project and recognize how much the substantial negative impacts outweigh any perceived or potential minimal benefits there may - or may not - be. I strongly urge you to reject this Project in favor of something more safe and aligned with CMR's and San Diego's vision and sensibilities that preserve our beautiful community, health and environment.

Thank you,

Brenda Sappenfield  
Brewster Ct.  
San Diego, CA 92128

I171-7

I171-8

intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I171-7**

Refer to **Response to Comment 02-11a** regarding open space. Refer to **Master Response 1**, regarding the proposed rezone and amendments to the City's General Plan and the Carmel Mountain Ranch Community Plan.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

**I171-8**

Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

**I171-9**

Comment noted.

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Comment Letter I172

**From:** Brandon Padilla <brpadilla.account@gmail.com>  
**Sent:** Sunday, February 7, 2021 11:06 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Good evening,

As a Carmel Mountain Ranch homeowner for over 19 years, I am anxious to know how the city plans to address the proposed Trails project, specifically the reduction in park space. As a parent of three young children, Carmel Mountain Ranch (CMR) is severely lacking in parks and outdoor play areas. Currently, there are only two parks in the neighborhood: Carmel Mountain Ranch Park (10152 Rancho Carmel Drive) and Highland Ranch Park (14840 Waverly Downs Way), which are 11.4 and 5.3 acres in size, respectively. For clarity, please note that I am referring to actual parks with playground equipment and outdoor space, not a small patch of grass with a picnic bench. For over 12,000 residents in a roughly 1,400 acre planned community, our parks are already insufficient for our children. In fact, we rarely visit our neighborhood parks due to their overcrowding, we find ourselves spending more time in adjoining neighborhoods; both Rancho Penasquitos and 4S Ranch have a much larger park/green space footprint, with respect to percentage size and per capita residents.

While I am not an original homeowner, I know CMR was granted a zoning exception due to the golf course, which is approximately 165 acres. While its use was restricted to paying customers, at least there was open space and green views for the residents. Presently, the Trails project is proposing construction on 11 of the 18 holes, which accounts for over a 60% loss of green space. While they highlight the 9 acres of parks, it is important to note that none of them will contain ball fields or open space for sports activities. With 1,200 units and 3,000 residents in this project, I don't understand how this construction meets the city's General Plan, which for zoning purposes classifies the golf course as parks and recreation. Furthermore, it raises questions about how the project complies with the city's Climate Action Plan, which requires substantial green space. While I respect the need for additional housing in our growing city, any new project should be required to explore existing commercial space, as the COVID-19 pandemic continues to disrupt traditional brick and mortar shopping locations. Destroying our green space should be our last option, especially as we address climate change together.

Ultimately, does the destruction and reduction of green space comply with the city's long term plans, as indicated above? Thank you very much for your time and I respectfully await your response to these concerns.

Regards,  
 Brandon Padilla  
 14818 Summerbreeze Way  
 San Diego, CA 92128

Response to Comment Letter I172

172 Brandon Padilla  
 February 7, 2021

I172-1

Refer to **Response to Comment 02-11a** regarding parks and open space. Refer to **Response to Comment 02-11b** regarding the City's park development process.

Refer to **Master Response 1** regarding land use consistency. Additionally, the Draft EIR considered the project's compatibility with the City's Climate Action Plan in Section 5.7, Greenhouse Gas Emissions, and determined the project would result in a less than significant greenhouse gas emissions impact. Refer to **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

I172-1

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Comment Letter I173

From: Marti Bieksha <mmbtoday@gmail.com>  
Sent: Monday, February 8, 2021 9:27 PM  
To: DSD EAS <DSDEAS@sanidgo.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello. We are residents at the former 17th green of Carmel Mountain Golf Course. We purchased our property in 2000 with the understanding that the area behind our house was to remain agricultural - housing a golf course.

We want to bring a couple of items to your attention in the wake of the proposed development of this former golf course.

1. Parking - There is already a lack of parking for the townhomes that were constructed on the former golf range. The residents of the townhouses park on Carmel Ridge Road as their complex does not support the number of people who occupy these homes. The proposed development does not address how it will accommodate this increase in density.

2. Cul-de-sac. A commitment was made when the townhomes were built that Eastbourne Road would be a cul-de-sac because of the increase in traffic. After reviewing the proposed plans, it looks as though an entry into the new development will be at the cul-de-sac on Eastbourne. How is that upholding the previous agreement?

3. Infrastructure - if you travel to this area during the weekend, you will experience the saturation we have in regard to our grocery locations and roads. The roads are mine fields of potholes and bandaids to fix the potholes. The parking lots, on any day of the week but especially on Saturdays in the parking lot which houses both Trade Joe's and Ralphs, are packed. Residents are required to continue circling the lot and following people in their cars to find an available spot.

4. Set-backs from existing housing - The proposed set-backs for where our property ends and the new construction starts are outrageous. We paid a premium price to have our home located on a golf course and on a corner lot. We will still remain a corner lot but now with headlights in our bedroom and the once sought after view of the golf course will now be obstructed by multiple individuals looking onto our yard, home and specifically our bedroom.

I173-1

I173-2

I173-3

I173-4

I173-5

Response to Comment Letter I173

173 Bob and Marti Bieksha  
February 8, 2021

**I173-1** Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.

**I173-2** Refer to **Master Response 3** regarding parking.

**I173-3** The commenter is correct that Eastbourne Road is proposed to be an entrance to the project site. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

**I173-4** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Overcrowding at shopping centers is not a physical change to the environment.

**I173-5** Setbacks and views are discussed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.

We bought a home in a planned community that we were told would have no further development as it was maxed out. We have made vast improvements to our lot and our home. Now, because a "businessman" made poor choices on how to maintain a golf course, we must all suffer the consequences of his foolish choices.

I agree with more housing in San Diego. I want my children to be able to live in this community where they grew up but what is planned is not the community that was established. There are no single family homes. These are high rise dwellings cramped into an already planned space. Please, put yourself in our shoes. Would you want this development in your backyard?

Regards,  
Bob and Marti Bieksha  
14324 Carmel Ridge Road  
San Diego, CA 92128

↑  
I173-5  
Cont.

↑  
I173-6

**I173-6**      Comment noted.

Comment Letter I174

From: Blake Sperry <blake.sperry@yahoo.com>  
 Sent: Monday, February 8, 2021 7:26 AM  
 To: DSD EAS <DSDEAS@sanidiego.gov>  
 Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern:

The purpose of this email is to voice my concern regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. I have read through a large amount of information regarding the proposal, and the following issues are most important to me:

1. The Poway Unified School District has long been one of the best school districts in Southern California, and was the reason my family chose to move here 25 years ago. As a former student to this school district, I have benefited from the excellence they strive for. Should the 1,200 units New Urban West is proposing to build be approved, how will our school district be able to maintain its standard of excellence with the accompanying significant increase in student population?
2. Most of us who live here know one or more families who have lost homes to the 2003 Cedar fire or the 2007 Witch Creek fire. Thankfully, there was minimal loss of life. How can we ensure our community's families will be able to safely evacuate the next wildfire with the addition of 1,200 housing units in our immediate backyards?

Sincerely,

Blake Sperry  
 CMR Resident  
 11835 Wilmington Rd.  
 San Diego, CA 92128

Response to Comment Letter I174

174 Blake Sperry

February 8, 2021

- I174-1** The City acknowledges the comment as an introduction to comments that follow.
- I174-2** Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I174-3** Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.



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Comment Letter I175

**From:** Mike Sperry <mbsperry601@aol.com>  
**Sent:** Sunday, February 7, 2021 5:40 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Troy@WealthAnalytics.com  
**Subject:** [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern:

The purpose of this email is to voice my concern regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. I have read thru a large amount of information regarding the proposal, and the following issues are most important to me:

- 1) The Poway Unified School District has long been one of the best school districts in Southern California, and was the reason my family chose to move here 25 years ago. Should the 1,200 units New Urban West is proposing to build be approved, how will our school district be able to maintain its standard of excellence with the accompanying significant increase in student population?
- 2) Most of us who live here know one or more families who have lost homes to the 2003 Cedar fire or the 2007 Witch Creek fire. Thankfully, there was minimal loss of life. How can we ensure our community's families will be able to safely evacuate the next wildfire with the addition of 1,200 housing units in our immediate backyards?

Sincerely,

Beth Sperry  
 CMR Resident  
 11835 Wilmington Rd. San Diego, CA 92128

Sent from [Mail](#) for Windows 10

Response to Comment Letter I175

175 Beth Sperry  
 February 8, 2021

**I175-1** The City acknowledges the comment as an introduction to comments that follow.

**I175-2** Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

**I175-3** Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

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Comment Letter I176

From: Ashish Pandit <aspandit@yahoo.com>  
Sent: Monday, February 8, 2021 3:53 PM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To:  
E. Shearer-Nguyen, Environmental Planner,  
City of San Diego Development Services Center,  
1222 1st Avenue, MS 501, San Diego, CA 92101,

From:  
Ashish Pandit  
12088 Ferncrest Place  
San Diego, CA 92128

Comment is sent Via e-mail to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov).

Dear Ms. Shearer-Nguyen and City Council:

I have been resident of CMR for last 7 years. I have reviewed the Environment report have participated in all the briefings provided by the builder and I believe with many other issues it destroys the community character of Carmel Mountain Ranch

There are so many tasks

**Destruction of Community Character - The** The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%. The Trails consist of 70% Apartments, Carmel Mountain Ranch has 24%. Carmel Mountain consists of about 52% single family homes, The Trails, 0 single family homes.

By building houses that doesn't match existing building style and character, it is going to destroy the community. It is going to uproot families who moved here looking at existing nature of the community.

As per Page 83 of the Carmel Mountain Ranch Community Plan under Design Compatibility, paragraph 1, "the choice of building Heights will be geared to the silhouette of the terrain: higher buildings are planned on lower ground particularly within the Town Center area"

As many of houses lower than the building the perceived height will much larger than the construction which is 48' and only 50' from our houses.

**Wildfire**  
The current area is considered as a high risk and had hard time getting insurance. With this additional 25% of housing , this is posing additional risk to fire escape time to every one. It is going to make it very unsafe

I176-1

I176-2

I176-3

Response to Comment Letter I176

176 Ashish Pandit

February 8, 2021

- I176-1** The City acknowledges the comment as an introduction to comments that follow.
- I176-2** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I176-3** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**Project alternative:**

With COVID 19, the business are changing for real even after pandemic is over. Many business offices are going to be available for mix use. Is there not an option to use that space for additional apartments and business together? This is a better solution from environment perspective than setting up apartment complex in the middle of the housing complex that is atleast 1.5 miles from the bus station.

Alternately, like to have developer consider low density option of 250 units or less.

100-foot Buffers for Sensitive Areas Are Needed on All Project Perimeters Project Objective 3, section ES.3 not met - Preserve the majority of the project site as open space, avoid areas of native vegetation or potentially suitable habitat for special-status plant species, and avoid areas of sensitive habitat including jurisdictional areas and their associated 100-foot buffers. ~ Proposed development should utilize those same 100' buffers for edge conditions adjacent to existing sensitive golf course homes. The 100' buffers with the trails are needed to p

**Transportation**

The mitigation option regarding VMT impact and transportation wouldn't work. With the hilly area and myself being a cyclist, bikes work only with those who are very fit and able to climb more than 4% of the climb. The former golf course was constructed on steep hillsides making bicycle travel a challenging exercise for all but the fittest of riders

**Buffer**

Current 50' buffer is not acceptable. It needs to be minimum 100' in order to have new structures blend in.

**Public Recreational Area is Reduced,**

There is no public recreation to where we are located close to #10 and #11. Why is there no consideration for existing residents?

Thanks,

Ashish Pandit

12088 Ferncrest Place  
San Diego, CA 92128

I176-4

**I176-4**

Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

**I176-5**

Regarding Project Objective 3, the project would not impact any special status plant species or vegetation communities (refer to Section 5.4, Biological Resources). Thus, the project would meet Project Objective 3 pertaining to resource protection. Refer to **Master Response 2** for community compatibility concerns. Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

I176-5

I176-6

I176-7

I176-8

**I176-6**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The project's location in a transit priority area matters for vehicle miles traveled mitigation through compliance with the City's "Complete Communities: Mobility Choices Program". The project follows requirements for Mobility Zone 2 (Transit Priority Area—TPA) because Mobility Zone 2 is defined as any premises located either partially or entirely in transit priority area. The project provides vehicle miles traveled reduction measures, including several on-site bicycle facilities and amenities, in accordance with the program. Because the project cannot guarantee specific vehicle miles traveled reductions associated with the reduction measures, the project continues to have a significant and unavoidable transportation/circulation impact. Refer to **Master Response 3**.

- I176-7** Refer to **Response to Comment I176-2** and **Response to Comment O2-13a** regarding aesthetics impacts and buffers.
- I176-8** Refer to Response to Comment O2-11a regarding parks and open space.

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Comment Letter I177

**From:** Andrew Kalfayan <atkalfayan@gmail.com>  
**Sent:** Monday, February 8, 2021 3:25 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch Project Number 652519/SCH No. 2020039006

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To Whom it May Concern:

Below are a couple of my concerns with the proposed plan.

I disagree with the assessment that PUSD has the availability to facilitate additional students. It is a well known fact that our schools have been working with limited resources/teachers and increased class sizes. Allowing further development of an already populated community will only perpetuate the problem. In addition this assessment is only taking into account the impact of this one development and not the other developments taking place in the immediate area. These other developments will also have an impact on PUSD.

I believe that the 3-4 stories will be significantly different than what was planned and is available in the existing community. This completely changes the character of the Carmel Mountain Ranch community. This was a master planned community and the land was assigned as agricultural. If there was a thought that in the future this land would need to be developed into additional housing then it should have been assigned as residential. I believe that there are other options available for this land that will keep to the original agricultural designation while maintaining all historic monuments and open space.

Thank you for your time,

Andrew Kalfayan

**Response to Comment Letter I177**

**177 Andrew Kalfayan**

**February 8, 2021**

**I177-1**

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

**I177-2**

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I177-1

I177-2



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Comment Letter I178

From: Amy Spedale <amyspedale@gmail.com>  
Sent: Monday, February 8, 2021 7:32 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Cc: Troy@wealthanalytics.com  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

SD City Planning Commission,

I have numerous concerns regarding the planned development by New Urban West and the associated EIR report:

(1) The EIR report does not appropriately contain a low density alternative that is cohesive and coherent with the existing community. All the building types (100%! ) proposed are multi-unit buildings that are 3 to 4 stories high in a single family 2-story planned community.

(2) The project is not aligned with the City of Villages Strategy. Carmel Mountain Ranch is a hilly area and the planned project does not adequately provide a walkable village. The developer is purposely misleading on this topic to try and convince they are in compliance of this strategy, which they very clearly are not. Most of the plan is farther than 0.5 miles with significant elevation changes leading to the "city center". This means more vehicle traffic for short trips which will increase greenhouse emissions. This unmitigated increase of greenhouse gases is in direct opposition to both the City and the State action plans to reduce greenhouse emissions.

(3) The negative impact on traffic and appropriate mitigation efforts are missing from the plan and EIR. The already overloaded residential streets cannot handle the increased VMT this project will add. In addition, there was not any impact study done in the EIR for the I-15/56 freeways. How can this be overlooked and not deemed as mandatory for the EIR report? There is little to no room for expansion on the I-15/56 in the Carmel Mountain Ranch area and the population increase by this project will of course impact these freeways beyond repair. We need to better understand this impact before moving forward with any project in the area. Why was this impact study not part of the EIR?

(4) Where is the comprehensive impact study from all the development proposals in the area. There are at least 2 other projects (Alante & The Junipers) within several miles and the EIR report is missing the comprehensive net EIR impact from these developments. Who is analyzing and looking at the big picture? How can a decision be made without a full impact analysis connecting all of the dots?

I178-1

I178-2

I178-3

I178-4

Response to Comment Letter I178

178 Amy Spedale

February 8, 2021

I178-1

Refer to **Master Response 10** regarding alternatives.

I178-2

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined significant and unavoidable. Refer to **Master Response 3**.

Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

I178-3

Vehicle miles traveled is the transportation metric for CEQA analysis. Level of Service and congestion or capacity-based measures of effectiveness are not considered as impact criteria for CEQA purposes.

Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. No improvements were identified for freeway ramp intersections. Vehicular queueing at freeway off-ramp intersections was evaluated in the LMA (Draft EIR Appendix C) for

I recommend the City Planning commission vote NO on the approval of this project as planned and seek a development solution that is cohesive with the community and complies with both the City and State's strategies and goals. These goals should not be ignored!

Thank you and I look forward to receiving a response addressing my concerns,

Amy  
14462 Seabridge Lane  
San Diego, CA 92129  
858-232-6017

I178-5

all analysis scenarios. No ramp queues exceeded storage capacity under any analysis scenario. The Transportation Study Manual does not require the analysis of ramp meters or freeway segments in the Local Mobility Analysis. Refer to **Master Response 3**.

**I178-4** Cumulative impacts from other projects in the area were included in Chapter 6, Cumulative Effects, of the Draft EIR. As shown in Table 6-1 of the Draft EIR, a total of 11 other projects were analyzed in combination with the proposed project, including the Alante project and the Junipers project.

**I178-5** Comment noted.

Comment Letter I179

Response to Comment Letter I179  
179 Allen Zeighami  
February 8, 2021

From: mbiautoloan <mbiautoloan@yahoo.com>  
Sent: Monday, February 8, 2021 1:53 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Golf Course Development

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom It May Concer,

As a home owner living in Carmel Mountain Ranch for past 23 years I am totally against the project developments in the golf course. It causes more traffic, adding populations, reducing properties values, destroys the piece and quite environment, bringing all kinds of strangers to the community and many more obstacles and problems. I am totally against it.

Thank you  
Allen Zeighami

Sent from my T-Mobile 4G LTE Device

I179-1

I179-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I180

Response to Comment Letter I180  
180 Ben and Maria Padilla  
February 7, 2021

I180-1

Community character, building heights, and setbacks were addressed in Section 5.17, Visual Effects/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Additionally, refer to **Master Response 1** regarding the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.

I180-1

From: bxpaddilla bxpaddilla <bxpaddilla@cox.net>  
Sent: Sunday, February 7, 2021 6:42 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Cc: Benjamin Padilla <bxpaddilla@cox.net>; MARIA <MPADILLA2009@GMAIL.COM>  
Subject: [EXTERNAL] Comments from CMR Homeowners re: The Trails proposal

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Sirs:

We are writing to voice our concerns regarding the planned project "The Trails" at Carmel Mountain Ranch.

We are Carmel Mountain Ranch Homeowners. Our house is at 14204 Breezeway Place in Carmel Mountain Ranch.

The proposed multifamily/multistory construction is not compatible with the existing community of homes at Carmel Mountain Ranch and would adversely impact the character of the existing community.

The project is 100% multi-unit buildings, where Carmel Mountain Ranch currently has 47% multi-unit buildings.

The Trails consist of 70% apartments, where the rest of Carmel Mountain Ranch has 24% apartments.

The Trails proposal does not include single family homes, where Carmel Mountain Ranch has 52% single family homes.

The Trails proposes building heights of 37 feet and 48 feet with minimum building setbacks of 50 feet from the property lines of existing 2-story homes.

Currently existing apartment buildings are placed at lower elevations so as not to tower over single family homes. The Apartments in Carmel Mountain Ranch are also built on the outer edges of the Community, not in-between rows of single family homes.

The existing 3-story Jefferson Apartments have at least a 100 foot separation from the condominiums at Windham and a 200 foot separation across the former fairway to the homes on Carmel Ridge Road. Carmel Landing apartments are a lower elevation to homes on the east and are separated by a 4-lane parkway (Rancho Carmel Drive) to the west. Homes in Carmel Mountain Ranch that have a 50 foot or less rear separation are of equal height and type, single family home to single family home.

We ask that The Trails proposal be modified to conform to the Carmel Mountain Ranch Community Plan, placing 2-story single family homes at upper elevation and core areas of existing CMR development to create appropriate and compatible densities. Three to four story apartment buildings should match the style and locations per CMR plan with 75 to 100 foot landscape buffers.

The Trails could have the same footprint of the proposed project but with reduced density to keep with the Carmel Mountain Ranch Community Plan and maintain the character of the existing Carmel Mountain Ranch Community surrounding the golf course.

Respectfully,

Ben & Maria Padilla

14204 Breezeway Place

San Diego, CA 92128

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Comment Letter I181

**Response to Comment Letter I181**  
**181 Residents of 14144 Stoney Gate Place**  
**February 7, 2021**

This letter is submitted on behalf of the residents of:

**14144 Stoney Gate Pl, San Diego**

Carmel Mountain Ranch in response to the proposed Trails at Carmel Mountain Ranch Draft Environmental Impact Report.

**Environmental Impact Concerns for project Project No. 652519**  
**SCH No. 2020039006**  
**SUBJECT: Trails at Carmel Mountain Ranch:**

| Topic area  | Issue                 | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Land Use    | Development on Unit 8 | There is a natural cooling of the air mass and a natural dropping of temperature linked to unit 8. This may be defined as a micro-climate or weather phenomenon as it is naturally occurring. It is constant and it occurring at the same location. Building 98 dwellings within unit 8 and adding impervious surface to over 95% of the alley floor in this area will interfere with the natural cooling of the air mass over this region and disrupt this naturally occurring weather phenomenon.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>→Please refer to note 1 below for discovery and discussion. |
| Air Quality | Development on Unit 8 | Any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location.<br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protect and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this</b>                                                                                                                                                                                                                                                                                                                                                |

I181-1

I181-2

I181-3

**I181-1**

The City acknowledges the comment as an introduction to comments that follow.

**I181-2**

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan or the Carmel Mountain Ranch Community Plan. Impacts related to the addition of impervious surfaces can be found are addressed in Sections 5.10 (Hydrology) and 5.18 (Water Quality), of the Draft EIR. Hydrology and water quality impacts were determined to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

**I181-3**

Specific to air quality, the purported topic area, the project's potential air quality impact is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7** regarding air quality, and **Master Response 10** regarding alternatives.

**I181-4**

Impacts to biological resources, including natural habitat, are analyzed in Section 5.4, Biological Resources, of the Draft EIR. The analysis concluded that the project would result in less than significant impacts with the incorporation of recommended mitigation. Impacts associated with drainage patterns,



|                          |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          |                                  | location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.<br>**Please refer to note 1 below for discovery and discussion.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Biological resources     | Development on Unit 8            | Development as proposed by NUW to add 98 dwellings and interfere with, alter and/or destroy over 95% of the natural habitat within unit 8. This area contains a unique deep valley setting with unique characteristics and unlike any other area this development is altering. As noted by NUW, Unit 8 is up to 20' below adjoining homes and all sites are sloped slightly to ensure drainage. Further, any development on unit 8 may change or alter a micro-climate or weather phenomenon taking place at this location. A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protected and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>**Please refer to note 1 below for discovery and discussion.                                                                                                       |
| Geologic Conditions      | Development on Unit 8 and Unit 2 | DSD EIR #652519 stated there was a unique area of topsoil and very moist ground areas in findings but never mapped out. Further include in the EIR report the relevance of the finding topsoil and if it is natural topsoil. "It takes time for topsoil to develop from the breakdown of organic matter (500-1000 years for 1-2 cms in some places)."<br>Source: <a href="https://www.bettermattersreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/">https://www.bettermattersreality.com/how-commercial-topsoil-is-made-differences-to-natural-topsoil/</a><br>Also determine or rule out if the creation of topsoil is in direct correlation to the moist and very moist area as mentioned previously and include in EIR.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area or interfere with the natural elements that may be contributing to the creation of topsoil and other natural soils and surfaces. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area that may also be connected to the geological conditions.</b><br>**Please refer to note 1 below for discovery and discussion. |
| Greenhouse Gas Emissions | Development on Unit 8            | Extensive development in this area will cause increased and altered GGE and may alter the unique micro-climate weather phenomenon presented in this area. Further all vehicle traffic will be getting routed by development to the exact location that this weather phenomenon is being experienced. The ADT provided by NUW show 784 at the entry and exit points. **Please refer to note 1 below for discovery and discussion.<br>A full study should be done to determine what is causing the air mass to cool naturally over this region and further steps should be allowed to determine if this area should be protected and preserve so this weather phenomenon will not be interrupted before any development takes place in this unit.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b>                                                                                                                                                                                                                                                               |

I181-3  
Cont.

I181-4

I181-5

I181-6

I181-5

I181-6

which are analyzed in Section 5.10, Hydrology, of the Draft EIR, were determined to be less than significant. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses a subject area, which received analysis in the Draft EIR.

The determination as to whether natural topsoil occurs within the project site is not an issue or an impact area that is required to be analyzed under CEQA. It should be noted that impacts pertaining to soils and geologic conditions are addressed in Section 5.6, Geologic Conditions, of the Draft EIR. As explained therein, the project will not result in significant geologic impacts. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses a subject area, which received analysis in the Draft EIR.

Greenhouse gas emission impacts are analyzed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. The Draft EIR determined the project would result in less than significant impacts. Refer to **Master Response 8**.

Traffic related impacts are assessed in Section 5.2, Transportation/Circulation, of the Draft EIR. The analysis concluded the project would result in significant and unavoidable transportation/circulation impacts. Refer to **Master Response 3**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

|                                        |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Hydrology                              | Development on Unit <b>8</b>          | DSD EIR #652519 stated they discovered very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>***Please refer to note 1 below                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Traffic                                | Development on Unit <b>1, 2, 8</b>    | Areas of traffic flow in and out of these areas are located at awkward locations in relations to the closest main street intersections Shoal Creek Dr, which will be impossible for residents to get out if developed in any situation of fire, flood or earth quakes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Land use                               | Development on Unit <b>8</b>          | DSD EIR #652519 stated they discovered very moist areas in unit 8. A more thorough study should be done including measurements of any streams or water sources below ground. It should be absolutely determined what is causing the moist and very moist areas referred to in the DSD EIR #652519. All finding should be included in the EIR.<br><b>Alternative: preserve unit 8 as a natural valley setting without altering its current topography or landmass area, minimize impervious surface at this location to the point that it will not modify or disrupt the natural air flow through this area. Leave all elevations alone and protect the elements that are creating the weather phenomenon in this area.</b><br>***Please refer to note 1 below<br><br>Disproportional and unfair placement of dwellings around the neighborhood of Belle Fleur. This development will have a substantial impact on over 85% of residence in Belle Fleur. More than 45% of all planned dwellings are going to be placed on the 4 units (unit 1, 2, 8 and 9) that share a common boundary with the residential properties. As planned Unit 1 - 66 Townhomes, Unit 2 - 87 townhomes, Unit 8 - 98 Townhomes and Unit 9 - 300 Market Rate Apartments. That equates to 551 new dwellings going on one of the 4 units adjacent to Belle Fleur / 1200 overall units = 45.9%<br>Yet Belle Fleur will be left with the smallest amount of open space adjacent to its residential boundary. And the majority of this open space will consist of wetlands, steep slopes and difficult terrain. Little to no open space on unit 8 and all green belt open space planned for removal, little to no open space on unit 2 and, little to no open space on unit 1 and all green belt planned for removal and only a small area of wetland (refer to DSD EIR #652519) left as open space next to the Belle Fleur boundary on unit 9. So, the Belle Fleur residents will experience the largest overall substantial impact in regards to number of new dwelling sharing their boundary, removal and destruction of all green belt surrounding Belle Fleur and a minimum amount of planned open and usable new open space and parks next to or within its boundaries.<br><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit.</b> |
| Visual Effects/Neighbourhood Character | Development on unit <b>1, 2, 8, 9</b> | 85% of Belle Fleur homes 85% have a green belt view from their backyards and another 12% having a partial green belt view from their properties. This development plans to incorporate multi-story, multi-family dwellings on over 85% of the land that makes up the green belt adjacent to the Belle Fleur homes. This will be a substantial change for over 85% of homes in Belle Fleur and a somewhat                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

I181-7

**I181-7**

Refer to **Response to Comment I181-4** regarding hydrology. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I181-8

**I181-8**

Refer to **Response to Comment I181-6** regarding traffic. All Unit driveways will be designed to meet City sight distance and design standards.

I181-9

**I181-9**

Impacts pertaining to streams and wetland/ jurisdictional resources were analyzed and addressed in Section 5.4, Biological Resources, of the Draft EIR. It was determined that no direct or indirect impacts to wetlands, streams or jurisdictional resources would occur with project implementation. As discussed in Section 5.6, Geologic Conditions, and Section 5.10, Hydrology, of the Draft EIR, groundwater was encountered at depths of 7 to 32 feet on the project site. Section 5.10, Hydrology, of the Draft EIR determined that the project would not result in decreased aquifer recharge or result in extraction from an aquifer. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

I181-10

**I181-10**

To the extent the comment raises concerns regarding open space, refer to **Response to Comment O2-11a**. Refer to **Master Response 1** regarding land use consistency. Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I181-11

**I181-11**

Visual character was addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to

|                 |                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                                        | <p>impactful change for 12% of the homes in Belle Fleur with partial views of green belt.</p> <p><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit.</b></p> <p>This development plans to utilize the majority of area on unit 1, 2, 8 and 9 for dwellings and amenities for these dwellings and will have a substantial direct impact on over 85% of homes in Belle Fleur, yet no dwellings in the plan to incorporate will match the same real estate classification as the homes in Belle Fleur. Characteristics of Belle Fleur homes are stand-alone single-family structures with front, side and backyards. Homes are approximately 2250-2550 square feet.</p> <p><b>Alternative is to have NUW plan for no dwellings on unit 1, unit 2 and unit 8. It is more logical to incorporating a higher concentration of multi-story multi-family dwellings within unit 5 and unit 6. Here the dwellings will be closer to the CCRSS Recreation Center and MTS and on more main roads that are easier and faster to connect to by transit. Plan to include some family homes on unit 9 that match the real estate style and type.</b></p> |
| Public services | entire development impact on population and resources. | <b>Introducing a drastic increase in the CMR population yet continues to decline adding essential public services such as library, schools, and safety professionals.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

**\*\*Note 1**

There is a weather phenomenon present at unit 8. Since the pandemic I have been walking on average 8-12 times per week past a particular section at the end of unit 8 along Shoal Creek Drive.

I walk around the entire perimeter of unit 8 going from Boulton Ave heading towards the East, then I turn right onto Carmel Ridge, I take another right onto Stoney Peak Drive, and another right onto Shoal Creek. As I approach the opening or valley view to unit 8, I feel the air get colder and remain a cooler temperature until I am close to the first property on the corner of Shoal Creek and Windcrest Lane. I continue up Windcrest Ave until Boulton Ave, where I take another right and complete an entire circle around the perimeter of unit 8. I usually walk early mornings between 6:30-8:00am and/or 6:30-9:30pm.

There is a noticeable and constant drop in temperature at this precise location (see pictures) every time I travel through it.

I am no expert in weather patterns but there is definitely some form of unique micro-climate or weather phenomenon that is caused by the properties of natural elements that are present at unit 8 and that is naturally causing a cooling of surface air in this location. I have walked through this location over 250 times within the past 6 months and every time this constant pattern of cooler surface air is present at the same exact location.

The drop in temperature is quite sudden and dramatic and can be easily physically detected when one is present in this area.

I181-11  
Cont.

**I181-12**

I181-12

I181-13

**I181-13**

**Master Response 2.** Also refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Schools and library facilities are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Impacts to library facilities were determined to be significant and unavoidable. Refer to **Master Response 6**. Section 5.14, Public Services and Facilities, of the Draft EIR concluded that the project would not result in any other significant public service impacts. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment noted.

Due to climate change and all factors that are adding to global warming, I believe a full report should be made and documented to see what is causing this weather phenomenon at unit 8 and if in fact, we should do our best to preserve such a unique natural phenomenon.

Further, I also came across part of the EIR that mentioned unit 8 had moist areas that were not mapped and I believe now that further inspection and mapping should take place. This should include instruments that may detect underground streams or other forms of moisture that could be a cause of effect of factors associated with this micro -climate weather phenomenon taking place.

The DSD EIR also mentioned unit 8 had an area of topsoil and other minerals in the soil that may also be taken into consideration as to a possible cause and/or effect of any conditions associated with a weather phenomenon or micro-climate.

Unit 8 is a very unique area that presents a valley setting that will be permanently destroyed by this development. According to NUW, unit 8 is the only area that will be graded 20' below adjoining homes. Unit 8 is a beautiful deep valley and quite unique location when compared to the other development areas and we should seriously consider to preserve this area

Further the exact location on the micro-climate weather phenomenon is where this development plans to have the vehicle access to unit 8 with 784 ADTs according to information provided by NUW.

748 ADTs will also add to green gas emissions and altering of the air in this location.

↑  
1181-13  
Cont.  
↓

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Comment Letter I182

From: Douglas Crow <drc2700@yahoo.com>  
Sent: Monday, February 8, 2021 1:46 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

I am a 76 year old resident of Carmel Mountain Ranch(CMR). We moved to CMR in 1992 because of the ambience of CMR and all the convenience of "Live, Work, and Play" in CMR.  
We have two major concerns regarding the addition of 1,200 apartments to our community; (1) Safety of Egress: Since 1992 CMR has been threatened by 2 (TWO) major fires. The first fire evacuation was very organized and flowed well; while the second fire and evacuation was very threatening. Adding an estimated 1,200 to 2,400 cars to the only evacuation route will likely result in many DEATHS!

(2) Infrastructure Overload: As CMR residents and families age so do the number of cars per residence. When we move to CMR in 1992 the cars parked on th streets were predominantly visitors; today the cars belong to the residents. The increase in cars will add to air pollution, erosion of streets, and congestion of all facilities.  
We are not "NIMBY'S but the addition of 1,200 multi-story units in a predominantly single story community is a poorly thought out project whose only goal must be to make a lot of money for the developers.  
Sincerely yours,

Douglas R. Crow  
11986 Tivoli Park Row  
San Diego, CA 92128

[Sent from Yahoo Mail on Android](#)

I182-1

I182-2

**Response to Comment Letter I182**

**182 Douglas Crow  
February 8, 2021**

**I182-1** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I182-2** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I183

Response to Comment Letter I183

183 Dien and Jennifer Ha

February 8, 2021

From: Dien Ha <dienha1668@gmail.com>  
Sent: Saturday, February 6, 2021 2:31 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

Hi,

My family lives at 14854 Werris Creek Lane, San Diego, CA 92128 since 2003. We moved to this neighborhood because it is not congested with traffic and we feel comfortable that our son can walk safely to school as well as a good school district.

With project # 652519/SCH No. 2020039006, these units will create more traffic and make it unsafe for children to be walking to school. We wish to continue to foster the safe and uncongested traffic in our neighborhood. I hope you will consider other locations for your plans.

Thanks,  
Dien and Jennifer Ha



Virus-free. [www.avast.com](http://www.avast.com)

I183-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I183-1



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Comment Letter I184

Response to Comment Letter I184  
184 Diane Jachim-Petroff  
February 5, 2021

From: DIANE PETROFF <djachimpet@aol.com>  
Sent: Friday, February 5, 2021 5:06 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project - Trails at Carmel Mountain Ranch, # 652519/SCH No. 2020039006/Council District 5

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We paid a premium for a larger lot on a cut-de-sac, with a beautiful view of the first hole. Little did we realize that the owner of the golf course would be greedy when golf lost some of its popularity, and water rates rose. The land could have been used for one and two story home, tastefully designed, instead of taking advantage of existing homeowners. There is a place for rental apartments, and condo's - and it's not in personal residences back yards.

We were here when the Witch Creek fire struck Scripps Ranch. We saw the flames from our back yard on Breezeway Pl and had to evacuate. We headed towards Anaheim, where we spent the night. Trying to evacuate was a nightmare, even in 1988. Traffic was at a standstill. What will happen when a fire strikes in the near future?? Will the people living in "The Trails" be able to evacuate?? West of Hwy15 are new multi family projects. Roads can't be added or expanded because of all the new development. The city does not care about it's current residents!

I would appreciate if some of these concerns were considered.

Disappointed Homeowner,

Diane Jachim-Petroff

I184-1 Comment noted.

I184-2 Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I184-1

I184-2

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Comment Letter I185

**From:** Diana Walker <dianawalker8587@gmail.com>  
**Sent:** Saturday, February 6, 2021 12:51 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom it May Concern:

Re: The Trails at Carmel Mountain Ranch

I understand this will be the largest infill development in over a decade.

I believe this project will lead to massive environmental damage, traffic, fire safety and evacuation issues, stress on schools, and libraries due to the significant increase in population.

Let's keep Carmel Mountain the amazing family community which it currently is.

Thank you for your time and consideration.

Diana Walker  
 12025 Eastbourne Road  
 San Diego CA 92128

858.229.0227

I185-1

**Response to Comment Letter I185**

**185 Diana Walker**

**February 8, 2021**

**I185-1**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Schools and libraries are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Impacts to library facilities were determined to be significant and unavoidable. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I186

**From:** Deepti Bhat <deeptibhat@gmail.com>  
**Sent:** Sunday, February 7, 2021 10:25 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Re: Comments on trails of CMR

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Sir/ Madam,  
 We are residents of CMR for the last 20 years. We are not in favor of the new Apartment units in CMR. Already our schools are crowded and this will be an added stress on our school system. Our roads are in bad shape and its been years since pot holes has been fixed.  
 When already we are on capacity we dont see why the CMR has been chosen to loose some of the green spaces that makes our neighborhood special.  
 These little pockets of greenery gives us a little space to unstress from our busy schedule.  
 Please dont crowd these areas.  
 Regards,  
 Deepti

I186-1

**Response to Comment Letter I186**

**186 Deepti Bhat  
 February 7, 2021**

**I186-1**

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6.**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3.**

Refer to **Response to Comment 02-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I187

From: Deborah Fontaine <debafont@gmail.com>  
Sent: Saturday, February 6, 2021 2:10 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Cc: Deborah Fontaine <debafont@gmail.com>  
Subject: [EXTERNAL] Project Name- The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No.2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

E. Shearer-Nguyen, Environmental Planner,  
City of San Diego Development Services Center,  
1222 1st Avenue, MS 501,  
San Diego, CA 92101

Dear Ms. Shearer- Nguyen and City Council:

My Opposition to the planned development called the Trails at Carmel Mountain (referred to as Trails in this letter) is generated from passion for my community and its health and safety.

In the review of the EIR presented to our community there are numerous areas of serious concern which need to be addressed for the health and well being of our people. Carmel Mountain Ranch (CMR) is a community built and developed around a plan the leads both to the safety, health and well being of our community members and the environment and the Trails puts this status under attack.

In the review of the EIR our community is being set up for a life threatening situation if we need to evacuated due to wildfire, constant gridlock traffic due to the increased population proposed, environmental hazard from increased noise, dust and traffic, increased green house gases being produced and the destruction of our parks and open spaces.

**6.1.19 Wildfire (Evacuation)-EIR Flaw**  
CMR is in an extreme high fire severity zone and the Trails will make this issue even worse. The state map for the City of San Diego 2009 shows this designation in grids 35, 36 and 40. The Trails will add 1200 units and approximately 3500 people to this evacuation equation in our area where history has shown it is already dangerously congested when evacuation is needed. Yes, we have routes 56 and 15 but this has not been enough in the past. "The extremely powerful Santa Ana winds fanned the wildfires in Southern California, causing many of the wildfires to rapidly expand westward. At 1:30 AM PDT on October 22, 2007, the Guejito Fire ignited southeast of the San Diego Wild Animal Park, within the San Pasqual River drainage. By 4:30 AM PDT, the Guejito Fire rapidly expanded to Interstate 15, forcing the closure of the freeway in both directions, which disrupted some evacuations from areas affected by the Witch Creek Fire." was reported in our newspapers. The EIR makes no mention of how to evacuate our people or solve this problem.

This deadly wildfire evacuation concern is also a byproduct of the daily traffic congestion and gridlock the addition of the 1200 units and 3500+ people will bring to CMR and our surrounding communities like Poway. The addition of this number of people and vehicles has already been studied in the Twin Peaks Road Study of Traffic February 2017 which showed the intersection where Rt 56 terminates in Poway that some of the intersections are rated D and E indicating high levels of congestion. This was studied during routine rush hour traffic, not during an advancing wildfire where evacuation could be nearly impossible. As a resident that lived through the Witch Creek and Cedar Fires, the threat of hurricane force Santa Ana winds blowing out of the east forcing even greater numbers of people having to flee for their lives is devastating. One can remember the 10 or so people who died being caught in their cars by the advancing fires along with those trying to flee on foot as the gridlock blocked their way out.

Climate change and our need to reduce Green House Gases is either ignored or buried in this EIR. The report admits that "the project will continue to have a significant and unavoidable VMT transportation impact" (5.2.10). This is a noteworthy admission that indicates clearly that project will have long term negative impacts on traffic and GHG. Traffic, the project construction, HVAC system for apartment building wedged into narrow spaces, noise pollution from HVAC machinery and traffic (5.11-Noise) will only add to the deterioration of our community. The City needs to see that the Trails takes us further away from the Climate Action Plan of the city and state moving us further and further away from the 1990 goal while even crushing the 2021 levels.

Response to Comment Letter I187  
187 Deborah Fontaine  
February 6, 2021

I187-1 Comment noted.

I187-2 Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.



Considerable environmental damage, change in character of the City approved Community Plan and danger to our residents will result from this project. The Trails violates the many provisions of the California Environment Quality Act (CEQA) while presenting environmental issues that negatively impact our citizens.

Considerable environmental damage will result from the Trails. Additionally, community discussion points to the EIR being deficient in many respect. The Trails will result in the destruction of community character, loss the open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases greenhouse gas exacerbating climate change, reduced air quality, and more traffic gridlock. And our wildlife, the Cooper Hawks, gnatcatcher and yellow tail warbler will disappear.

The original plan for CMR was the open spaces, the recreational areas and it parks which is noted in the EIR 5.7-16 but the Trails, though noting open spaces and parks actually diminishes these essential community qualities and buries the real damage it does by cramming apartment buildings into narrow fairway spaces close to single family homes. It even says the Trails is in a TPA area when one tiny section is close to public transportation and the rest miles away, too far for people to walk to services.

Your attention to the issues surrounding the proposed Trails is appreciated. I thank you for your time and efforts to make Carmel Mountain Ranch remain a safe and healthy community for all its residents.

Sincerely, Deborah Fontaine  
11970 Eastbourne Road

I187-5

I187-6

Refer to **Response to Comment 02-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

**I187-3**

Refer to **Response to Comment I187-2**.

**I187-4**

Refer to **Response to Comment I187-2**.

**I187-5**

Refer to **Response to Comment I187-2** regarding wildfire, evacuation, greenhouse gas emissions, air quality, and traffic. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Master Response 9** regarding housing sprawl.

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

**I187-6**

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2), defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

Comment Letter I188

**From:** Dawn Nowlin <d.nowlin@sbcglobal.net>  
**Sent:** Friday, February 5, 2021 8:24 PM  
**To:** DSD EAS <DSDEAS@sandiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear E. Shearer-Nguyen,  
 I object to potential concessions for New Urban West for 3-C deviations from base zone standards (Appendix B, Table 1). Their requests for height deviation, lot area and street frontage apply to all but the PVT commercial unit 14. This demonstrates the inappropriateness of this type of development in addition to changing agricultural status (AR1-1) to residential that is mostly RM-2 and above (Appendix A, Table 2).

A height deviation request from 30 to 37 ft, or from 40 to 48 ft for 3 – 4 story, medium to low density residential buildings may not seem significant, yet realize these behemoth structures with only a 50' buffer zone are proposed to be plopped on very narrow lots in between single-family homes of 1 -2 story.

The Trails development is 100% multi-unit buildings which is not consistent with the current status of 53% single-family homes. *And*, NUW is only considering a 50 ft buffer zone between these high-density structures & existing homes. There are multi-family homes in CMR that have at least a 100' separation from the condominiums at Windham and a 200' separation across the former fairway to the homes on Carmel Ridge Rd. Why allow NUW to scrimp on these standards?

A range of housing types proposed by NUW does not comply with the existing community. The NUW developer was asked many times to provide similar type housing next to existing housing types to blend seamlessly with the CMR community. Instead, NUW proposes 3-4 story apartment housing next to single-family homes. The impact of a 1200-unit development on existing single-family homes, that paid a premium to be on the golf course to begin with, will be significantly compromised and undoubtedly reduce property values. Please also recognize that the

to their backyards. The NUW development project does not address these concerns. The hilly topography of CMR has afforded views of the hillsides or vast expanse of the golf course. NUW developments was asked but failed to consciously preserve the view corridors of existing homeowners throughout project, especially premium views at hilltops and upper areas (as designed for in original Community plan). They seem more intent on density at a cost of quality of the neighborhood. Thank you for considering my concerns about the NUW development and how the character of the CMR community will be forever, negatively changed by this development.  
 Regards,  
 Dawn Nowlin, 20-yr CMR resident; 11858 Wilmington Rd. SD 92128

Response to Comment Letter I188

188 Dawn Nowlin  
 February 5, 2021

I188-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Refer to **Master Response 1** regarding land use compatibility and consistency with the City's General Plan and Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.

I188-2

Community character was addressed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment.

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Comment Letter I189

From: Dave Downing <dave.r.downing@gmail.com>  
Sent: Monday, February 8, 2021 5:06 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

I'm writing to express my significant concerns about The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

Specifically, the Draft EIR's fire evacuation analysis does not quantify the potential danger from an extreme, wind-driven wildfire event. There is a significant amount of brush to the south and west of the proposed project. The impact of an additional 3,000 plus residents and their vehicles could be devastating to both property and lives in the event of an emergency evacuation.

Please ensure that the Draft EIR for The Trails at Carmel Mountain Ranch includes this analysis so that existing residents, the City and the developer can understand this potential threat to the safety of our community.

Thank you,  
David R. Downing  
11327 Provencal Place  
San Diego, CA 92128  
619-507-5339

I I189-1

I I189-2

I I189-3

Response to Comment Letter I189  
189 David Downing  
February 8, 2021

- I189-1      Comment noted.
- I189-2      Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I189-3      Comment noted.

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Comment Letter I190

From: darrin schwabe <dschwabe18@gmail.com>  
 Sent: Monday, February 8, 2021 9:51 AM  
 To: DSD EAS <DSDEAS@sandiego.gov>  
 Cc: Troy Daum <Troy@wealthanalytics.com>  
 Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

I am writing in relation to the Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

After reviewing the EIR, I had some concerns/items I wanted to be sure and identify. In advance, I appreciate your time and commitment to reviewing my feedback and to the effort your team is putting in this project to ensure it is safe and appropriate for our families who live in the Carmel Mountain Ranch community.

Item #1 Transit Center - Only a small portion of the proposed development is within a half-mile of the transit center, approximately 276 units. Unit 16 is about 2 miles walking distance from the Transit Center and 0.4 mi from Ralphs. Units 9 and 10, with a projected 500 residents, are on average 1.5 miles from the Transit Center and 1 mile to Ralphs, exceeding the ½ mile walkable goal in the City's Mobility Element. (using the clubhouse, 14050 Carmel Ridge Rd and 12001 Ferncrest for averages). - Beyond the distances are the extreme elevation differences between most of the new units and either the Shopping Center or the Transit Center. Further, the topography, street layout, and locations of Trail points of connection to existing streets force walking paths to traverse steep (up to 10% slopes) grades to move around the CMR community.

Item #2 General Plan - Project Does Not Meet SD General Plan Urban Design Goals for Use of Open Space. The project is NOT consistent with policies UD-A.1 and UD-A.2, Urban Design Element Policy UD-A.1 (Table 5.1.2 (EIR Pg. 159) Project's Consistency with City of San Diego's General Plan ) Part a. "Protect the integrity of community plan designated open spaces" - Carmel Mountain Ranch was designed with the golf course land counting as part of the community's Open Space and per the Community Plan, "as a physical and visual amenity that will link the natural and physical features of the community into a coherent whole" Urban Design Element Policy UD-A.2 "Use open space and landscape to define and link communities." - The Trails at CMR takes away the very concept that Carmel Mountain Ranch was built upon, using open space of the golf course to define and link the community. Boundary planting, even with a pathway, cannot mitigate the placement of apartment and condominium complexes along with their connecting roads, parking lots, and refuse enclosures in the most central area of more than half of the former fairways.

Item #3 Wildfires - The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Nowhere in the basic treatment of fire evacuation re the community itself (pdf page 603, 5.19 Wildfire; PDF pages 613-18, 5.19.3 Impacts Analysis, Issues 1-3), or considered with cumulative impacts of adjacent communities (PDF page 637, 6.1.19 Wildfire) are evacuation times even mentioned. Appendix D, Fire Fuel Load Modeling Report, is similarly deficient. The Draft EIR does acknowledge that "Typically, the highest fire danger is produced by the high-pressure systems that occur in the Great Basin which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 mph and may exceed 50 mph during extreme conditions." The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. There are recent high wind-driven ember fires, with mass evacuations ordered, and clogged evacuation routes. This data must be presented and considered along with the additional impact of 3,180 additional residents and their vehicles.

Response to Comment Letter I190

190 Darrin Schwabe  
 February 8, 2021

**I190-1** Comment noted.

**I190-2** As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

**I190-3** Refer to **Master Response 1**, and Tables 5.1-2, and 5.1-3 of the Draft EIR, regarding land use compatibility and consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

**I190-4** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

You are our front line in ensuring any construction, no matter what it is, is done with the utmost consideration for health, legal requirements, the environment and future generations. I truly appreciate your taking this process and my input sincerely to ensure the full scope of all these items are vetted and reported on for full transparency to the community and deciding council!

Regards,

Darrin Schwabe  
14835 Summerbreeze Way  
San Diego, CA, 92128

I190-5

**I190-5**      Comment noted.

Comment Letter I191

From: Daniela De Castri <daniela.decastri@gmail.com>  
Sent: Monday, February 8, 2021 1:51 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Cc: Troy@wealthanalytics.com  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hi  
my email is in regard of the following project:  
**Project Name - The Trails at Carmel Mountain Ranch**  
**Project Number 652519/SCH No. 2020039006**

I have been living in the Carmel Mountain Ranch area since May 2000.  
After learning about the plan of building new structures in the area I am now very concerned about the Environmental Impact that this will cause to the existing establishment.  
Following is my risk analysis of the future plan, should that take place in the future

o Transportation/Circulation:

- Traffic increase will add smoke, pollution and poisonous particles to the air affecting the health of the residents especially kids an older people
- Traffic will increase Gas Emissions in the environment => worsening of the air we breath
- Roads and streets had not been built to support the increased number of circulating vehicles => increased pollution, increased number of accidents, decreased safety

o Structures

- the population density increase will have a negative effect on the current structures supporting the area: water resources, sewer pipelines, power supply impacting the safety of the people living in the area

o Greenhouse Gas Emissions

- the population density increase will have a negative effect on pollution

o Noise

- Noise pollution is another fact that will badly impact the population

o Wildfire

- vicinity of houses will increase the risk of danger for serious damages due to wildfire

A short side note is that when I purchased my house I chose very carefully the community where I wanted to live and that included an area where the surrounding did not have permission to build new houses

Daniela De Castri  
12140 Carrollton Square,  
San Diego, CA 92128

Response to Comment Letter I191

191 Daniela De Castri  
February 8, 2021

**I191-1** Comment noted.

**I191-2** Transportation/circulation impacts were addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality was addressed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions were addressed in Section 5.7. Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I191-3** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.



Impacts on public utilities were analyzed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant impacts to public utilities with mitigation incorporated, including water supply, sewer pipelines, and power supply. The comment addresses subject areas, which received analysis in the Draft EIR.

**I191-4** Refer to **Response to Comment I191-2** regarding greenhouse gas emissions and traffic. Noise impacts were addressed in Section 5.11, Noise, of the Draft EIR and determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Wildfire hazards are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I191-5** Comment noted.

Comment Letter I192

**From:** Daniel Shih <dshih2@gmail.com>  
**Sent:** Monday, February 8, 2021 12:29 AM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Re: Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and City Council,

I am a resident of Carmel Mountain Ranch and live directly in front of where the "Trails at Carmel Mountain Ranch Project" is proposed.

**Some of my family's concerns:**

1. Wildfires and CMR evacuation issues have not been studied and data has not been compiled to add the additional impact of 1200 new housing units, 3180 additional residents, and their vehicles
2. VMT analysis does not properly reflect increased greenhouse gas emissions
3. Unmitigated greenhouse gas emissions violate city and state climate action plans
4. Golf course blight must be remedied as soon as possible by current owners - there is a huge wildfire risk with recent high wind-driven ember fires
5. Public safety issues and increased street congestion caused by opening trails to public access

Thank you for your time and consideration,  
 Daniel Shih

I I192-1  
 I I192-2  
 I I192-3  
 I I192-4  
 I I192-5

**Response to Comment Letter I192**

**192 Daniel Shih  
 February 8, 2021**

- I192-1** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I192-2** Greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.
- I192-3** Refer to **Response to Comment I192-2**.
- I192-4** Refer to **Response to Comment I192-1**.
- I192-5** Refer to **Master Response 3** regarding traffic/congestion. Refer to **Response to Comment O2-7** regarding public safety.

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Comment Letter I193

From: Dan McCarthy <dmccarthy@intersectioncre.com>  
 Sent: Monday, February 8, 2021 6:52 PM  
 To: DSD EAS <DSDEAS@sanidiego.gov>  
 Subject: [EXTERNAL] EIR - The Trails at Carmel Mountain Ranch, Project Number 65219/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen,

As a resident of Carmel Mountain Ranch since 1997 and commercial real estate professional, I was contemporaneously aware of the master planning effort and thoughtful balancing of factors that preceded CMR's development. I am familiar with the infrastructure, traffic patterns, pedestrian access and general lifestyle of the CMR community. Naturally, I have an interest in the proposed changes detailed in the EIR and appreciate your review of my thoughts on the report.

The EIR goes into great detail about the proposed redevelopment of 1,200 residential units and subsequent effects on the community. The broad scope of this re-development is reflected by the significant amendments required to the current General Plan, zoning, community plans, as well as new approvals for environmentally sensitive lands and other required development permits. A number of important factors have been raised by the report. Here are my main takeaways after evaluating the information presented:

**Open Space** - In order to accommodate the 1,200 units there appears to be a significant reduction in open space. The existing CMR open space is recognized park and recreational open space according to San Diego's General Plan. The redevelopment plan would reduce such open space from the existing 112 acres to 52 acres. While the EIR indicates walking trails and dedicated park areas, the net result is a 64% reduction in such open space. Such a reduction is not only at odds with our General Plan, but also conflicts with the open space mandates of CA Senate bill 375. It is concerning to see an increase in developed density at the direct expense of open space reduction.

**Traffic** – Increase in VMTs are to be expected with such the proposed increase in residential population. The main arterial roads in the Carmel Mountain Ranch area were designed for the existing community plan and did not allow for significant increase in VMTs. Over the years, additional residential development to the east (Poway) and north (Rancho Bernardo) have increased vehicular traffic on Ted Williams Parkway, Camino Del Norte, Sabre Springs Pkwy/Rancho Carmel and Carmel Mountain Road. These arterials currently experience significant traffic loads from Carmel Mountain Ranch and the surrounding communities. Resulting safety concerns have mandated changes to turn lanes, right turn limits, and changes in stoplight controls. Further vehicular pressure is not advisable, as the EIR suggests such impacts to be "significant and unavoidable". It is likely that traffic will increase, and related vehicular/pedestrian safety will be reduced.

Response to Comment Letter I193

193 Dan McCarthy  
 February 8, 2021

I193-1

The City acknowledges the comment and notes it provides an introduction to the following comments.

I193-2

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and the project's consistency with the City's General Plan or the Carmel Mountain Ranch Community Plan. Refer to **Response to Comment O2-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

I193-1

I193-2

I193-3

**Community Identity** – The infill of 1,200 residential units as planned appears contrary to the community plan for CMR, as originally envisioned. The design is destructive to the original objectives for topographic character and landscaping. The proposed residential 2-3 story multifamily units are densely contained within limited open spaces and incongruent with the existing single-family concept. Since the original plan maximized densities with a balance to open spaces, infrastructure and community resources, the infill plan creates imbalance and generates new costs to the original residents. The topographical highlights of the CMR community are deeply impacted by the infill plan and have not been addressed by the EI

Overall, I find the EIR elicits many concerns to both known and potential impacts to the Carmel Mountain Ranch community. The EIR does not support the required changes to General Plan, community plan and zoning as they are contrary to current regulation and community planning goals.

Appreciate you taking these thoughts into consideration as you continue your process.

Best,

Dan

Dan McCarthy

Senior Director  
DRE Lic. #00928868



P 619.577.4557 M 619.261.3687 F 619.819.9919  
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I193-4

I193-5

**I193-3**

Traffic is discussed in Section 5.2, Transportation/Circulation, and proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and proposed roadway improvements.

Regarding pedestrian safety, Section 13 of the Local Mobility Analysis (Draft EIR Appendix C) identifies which intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The Local Mobility Analysis lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety. The comment addresses subject areas, which received analysis in the Draft EIR.

**I193-4**

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

**I193-5**

Comment noted.

Comment Letter I194

From: Christine Reed <creedcwinters@gmail.com>  
Sent: Monday, February 8, 2021 7:12 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Cc: troy@wealthanalytica.com  
Subject: [EXTERNAL] : Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern:

I'm sending this email to share my concerns regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. As a homeowner, community member, and parent I have a few thoughts on the impact of this proposed project.

1. For one, the Poway Unified School District is known for being a great school district in Southern California, and was the motivating factor for buying our first house in this area over 15 years ago. With the possibility of 1,200 units getting approved with New Urban West's proposal, it's hard to imagine this not having a direct impact on the quality of our schools already hit with providing education during a pandemic.
2. Remembering the 2007 Witch Creek fire and how close the flames came to our community when it was much farther than the golf course proposal is frightening. It looks like a fire hazard now right with the lack of upkeep, we are just trying to imagine evacuating like we did years ago with the dense population being added to the mix.
3. Traffic. Come one, this can't be something that will work.
4. All of the multi-housing projects across the 15 freeway are not even built and sold yet and we are already multiplying more units for an outside developer to profit from in the name of affordable housing? We are smarter and better than that. It will not remain affordable and will continue to diminish the quality of our community that so many people moved to live in for better schools and more space. The same community that many of us had to commute on the road for years to afford to live in because it was worth the sacrifice at the end of the day. And now that quality of life in this community and education system, along with the value of our homes we have worked so hard for all these years are being threatened to line the pockets of an out-of-state developer to simply check a box.
5. Have we not learned anything from the pandemic? It's the urban areas with dense populations that have been impacted the most. And yet...we want to build this in to a community founded on building something special away from the city with the intent of neighbors living next to each other, but not on top of each other.
6. Please consider working "with" our community and not against us.

Sincerely,  
Christine Reed  
14067 Stoney Gate Place 92128

Response to Comment Letter I194

I194 Christine Reed

February 8, 2021

- I194-1
- The City acknowledges the comment as an introduction to comments that follow.
- I194-2
- School capacity is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I194-3
- Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I194-4
- Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation
- I194-5
- The project would be required to comply with San Diego Municipal Code Section 142.1304, Inclusionary Affordable Housing Regulations, which requires the project to provide ten percent of the units on site as affordable. The project proposes to include 180 affordable apartments. In addition, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Impacts due to the pandemic and quality of life are not physical changes to the environment.

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Comment Letter I195

From: Bill Ho <billho.ocm@gmail.com>  
Sent: Monday, February 8, 2021 11:01 AM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern,

My family moved to Carmel Mountain Ranch community in 2018 before the golf course shutdown. We really love this community because of the nice people, nice environment.

I'd like to write this email to express my personal concern about the development of the golf course.

I think we should consider more about how to increase the cohesion of the community.

From my understanding to the proposed project, it is not cohesive in that the density and type of housing will stand out instead of blending in with the community. Instead, the project is 100% multi-unit buildings, the buildings are all three and four stories tall, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing homes.

I think this may dramatically change the current environment of my community, not only the space but also the living quality.

Hopefully you can consider this and help us to make the community better! Thank you!

Best regards,  
Chih-Hao Ho & Yafen-Hsieh  
Address: 13880 Etude Rd San Diego CA92128

I195-1

Response to Comment Letter I195

195 Bill Ho  
February 8, 2021

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.

I195-1



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Comment Letter I196

From: ccrsd@san.rr.com <ccrsd@san.rr.com>  
Sent: Sunday, February 7, 2021 9:53 PM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Cc: ccrsd@san.rr.com  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

February 1, 2020

E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501  
San Diego, CA 92101  
Via e-mail to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov).

Dear Ms. Shearer-Nguyen and City Council:

As a 20-year resident and home owner in Carmel Mtn Ranch, I am sending my concerns regarding the proposed project: New Urban West/The Trails at Carmel Mountain Ranch. My concerns relate to violations of the California Environmental Impact Act, traffic mitigation, school impact, wildfire evacuation plans/routes, and quality of life.

**California Environmental Impact Act:** Beginning with extensive construction traffic and the related exhaust, construction worker traffic, noise and dust pollution, dislodging of protected bird (Cooper's Hawk) and wildlife species and ending with the cumulative impact of cramming 3500+ more residents into a confined space...this project as proposed portends too much/too many on too little space.

**Traffic /Transportation:** New Urban West claims the project to be within easy access of the I-15 Transit Station. (TPA Overlay Zone)Unfortunately, this is true for a miniscule number of units. The overwhelming majority of project will be 1.5 to 3 miles from the transit center, thereby nullifying New Urban West's claim the project qualifies for TPA density bonuses. Traffic congestion/VMT would increase significantly in Carmel Mountain Ranch, all freeway access points, and surrounding communities.

On a weekday basis, traffic accessing Highland Ranch Elementary school is backed up for blocks waiting for the light at Highland Ranch Road/Eastbourne during start/dismissal times of school. Hundreds of proposed apartments will expand the number of students traveling to Highland Ranch Elementary either by car or foot, with parents then attempting to leave for work. In the current proposal, many of the apartment structures show exit/entrance traffic flow patterns dumping onto Highland Ranch Road within a block of the school.

1

I196-1

I196-2

I196-3

I196-4

I196-5

Response to Comment Letter I196

196 Cathy Carr  
February 1, 2021

I196-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I196-2

Refer to **Response to Comment I196-1** regarding traffic. Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Air quality was addressed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air Quality impacts were determined to be less than

significant. Refer to **Master Response 7**. Biological resources were addressed in Section 5.4, Biological Resources, of the Draft EIR. Biological resources impacts were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

**I196-3** Refer to **Response to Comment I196-1** and **Master Response 3** regarding traffic/congestion and vehicle miles traveled. Additionally, improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection.

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area. The comment addresses subject areas, which received analysis in the Draft EIR.

**I196-4** Comment noted.

One apartment complex exiting onto Highland Ranch Road requires cars to only exit to the west then most likely execute a U-turn at an already congested intersection and heavily trafficked student crosswalk located at Highland Ranch Road/Eastbourne to then head to Ted Williams/access to highway 15.... the result creating an extremely dangerous situation for elementary students crossing in the crosswalk.

**School Impact:** As a PUSD teacher for 40 years, I cringe at the prospect of an ever-changing, revolving door of more transient apartment-dwelling students attending local schools. It takes a huge time commitment on the part of school personnel to integrate new students into a classroom, help them assimilate to classroom routines, and assess and address their individual educational needs. Inevitably, the constant comings and goings of a fluctuating student population, perhaps made more transient with apartment dwellers than students from single family homes will detract from the overall quality of education of all students.

**Wildfire Evacuation Plans/Routes:** During wildfire evacuations in 2003 and 2007, access roads to I-15 were dangerously congested with slow moving traffic from not only CMR but surrounding communities. There are limited thoroughfares for evacuation traffic. Adding 3500+ residents to the already traffic flow increases the danger for all residents.

**Quality of Life:** The residents of Carmel Mountain Ranch purchased properties specifically designated as Park/Open Space and Recreation with the expectation of having open, green space with a community plan, not a sprawling urban environment condensed with apartments and condos. The proposed project violates the promise made to current residents to live in a spacious community comprised of mostly single-family homes. The aesthetic aspects of Carmel Mountain Ranch do not lend themselves to 4 story apartment buildings with mass units, the cramming of as many units as possible on any available space.

*According to the City of San Diego Land Use and Community Planning Element, "it is the City of San Diego's practice to apply zoning that is consistent with community plan land use designations to ensure their implementation."*

Amenities in CMR for groceries, laundry, gas, coffee shops and restaurants are overcrowded with limited parking while shopping....one can only imagine adding 3500+ more residents.

While I understand the need for more housing in San Diego County, I do not support this massive housing project.

Sincerely,  
Cathy Carr  
CMR Resident

I196-5  
Cont.

I196-6

I196-7

I196-8

I196-9

**I196-5** Comment noted.

**I196-6** Refer to **Response to Comment I196-1** and **Master Response 6** regarding schools.

**I196-7** Refer to **Response to Comment I196-1** and **Master Response 5** regarding wildfire and evacuation.

**I196-8** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment.

**I196-9** Comment noted.

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Comment Letter I197

From: Caroline Palmer <caroline.m.palmer@gmail.com>  
Sent: Monday, February 8, 2021 5:13 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Feedback for: Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Project Name - The Trails at Carmel Mountain Ranch  
Project Number 652519/SCH No. 2020039006

Dear City of San Diego:

San Diego is in a housing crisis and we need to develop more housing, however, housing proposals need to be in alignment with a neighborhood's intrinsic constraints and character. After reading through the Environmental Impact report I am greatly concerned about the impact the New Urban Development proposal will have on Carmel Mountain Ranch. The development's plan of 1200 units is too aggressive, the fragmented design of the proposal is not well thought out, and it imposes significant impacts and risks on the community.

Destruction of Community Character:

Within two blocks of my house in Carmel Mountain Ranch, there are three different apartment complexes (Jefferson at Carmel Mountain Ranch, Carmel Summit and Carmel Terrace Apartments). These apartments were well planned. They are landscaped into the topology of Carmel Mountain. Most are two story apartments and a few three story apartments are perfectly graded into a hillside to offset their height. They are constructed on large swaths of land that were easily developed and independent. These were well planned out complexes walking distance to shopping and public transportation with close access to freeways. They retain the community character of Carmel Mountain Ranch.

The Carmel Mountain Ranch golf course presents a very difficult challenge for development with its 18 long and narrow swaths of land fully surrounded by people's backyards. New Urban Development agreed that this was a challenge for them. Rather than rise up to the occasion of developing a unique solution to develop these areas in coherence with the surroundings, they proposed an extremely dense development of 1200 units with 3-4 story buildings, developed on 11 holes of the golf course, next to people's backyards. Additionally, there is no mention of grading the landscape to offset the unprecedented height of these buildings.

This proposal is not cohesive with the surrounding. Not only will these large complexes block views and take away the green spaces that were parceled out throughout the community, but the sheer density of these units and their design do not fit with the community character.

Additional Traffic and Noise

Most of the areas being developed in this New Urban Development proposal are located far enough away from shopping that they are not considered walkable. As the crow flies, distances are short, but due to topography and the design of the golf course holes, distances are quite far and require going up and down large hills. That said, the New Urban Development "walkable community" will actually contribute greatly to the traffic and congestion of roads and parking at shopping complexes. Additionally, the creation of roads in and out of the narrow entrances in these long golf holes will create a huge amount of disturbance for those surrounding houses, especially with 1200 units.

Response to Comment Letter I197  
197 Caroline Palmer  
February 8, 2021

- I197-1The City acknowledges the comment as an introduction to comments that follow.
- I197-2Comment noted.
- I197-3Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2.**
- I197-4As noted in Section 5.3, Air Quality and Odor, of the Draft EIR, project construction would include 957,607 cubic yards of cut and 995,763 cubic yards of fill as represented in the grading phase, which would require 38,156 cubic yards of import.
- I197-5Refer to **Response to Comment I197-3** and **Master Response 2.**
- I197-6Traffic impacts are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3.**

I197-1  
I197-2  
I197-3  
I197-4  
I197-5  
I197-6

Reduction in Green Space

The Carmel Mountain Ranch golf course is currently recognized as Parks and Recreational Open Space under the City's General plan. The proposal in place develops 11 out of the 18 holes, over half of the golf course. This is net loss for the community. Additionally, this development does not have any concrete plans for public parks and recreation, except for an inaccessible bit of land given to the City to develop into a park. Additionally, the holes with proposed development are closely located together, which means there are parts of Carmel Mountain Ranch that will in effect lose all of its surrounding green space within a 15 minute walking distance.

Project Alternatives

There should be a lower unit count option which optimizes larger swaths of land for development keeping narrower, less accessible holes freed up for green space. A 200-300 unit option with mixed housing would be a good compromise.

Summary

The reason I was drawn to Carmel Mountain Ranch was because of its character. I love the trees, the green space, the hills, the boulders, and the cool night breeze that flows off of the golf course. Development is necessary, but high-density development for the sake of development will have a profound negative impact on the community. This is not a large swath of land that is independent and can be developed in whichever way. It is a series of 18 long and winding roads nestled between people's backyards. It is important to maintain the character of the community as well as assess the real impact of traffic and noise and loss of green space on Carmel Mountain Ranch.

Thank you for your consideration,  
Caroline Palmer  
CMR Home Owner  
11737 Cedarhurst Lane  
San Diego, CA 92128

I197-7

I197-8

I197-9

I197-7

I197-8

I197-9

Noise impacts were addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses subject areas, which received analysis in the Draft EIR.

Refer to **Response to Comment 02-11a** regarding open space.

Refer to **Master Response 10** regarding the alternatives analysis.

Comment noted.

Comment Letter I198

From: Michael Sperry <mbsperry601@aol.com>  
 Sent: Sunday, February 7, 2021 9:21 PM  
 To: bsperry@mit.edu; DSD EAS <DSDEAS@sanidiego.gov>  
 Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Please email tonight to [dsdeas@sanidiego.gov](mailto:dsdeas@sanidiego.gov)  
 The subject needs to have the project name and number like it is

To whom it may concern:

The purpose of this email is to voice my concern regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. I have read thru a large amount of information regarding the proposal, and the following issues are most important to me:

1. The Poway Unified School District has long been one of the best school districts in Southern California, and was the reason my family chose to move here 25 years ago. As a former student to this school district, I have benefitted from the excellence they strive for. Should the 1,200 units New Urban West is proposing to build be approved, how will our school district be able to maintain its standard of excellence with the accompanying significant increase in student population?
2. Most of us who live here know one or more families who have lost homes to the 2003 Cedar fire or the 2007 Witch Creek fire. Thankfully, there was minimal loss of life. How can we ensure our community's families will be able to safely evacuate the next wildfire with the addition of 1,200 housing units in our immediate backyards?

Sincerely,

Bryan Sperry  
 CMR Resident  
 11835 Wilmington Rd. San Diego, CA 92128

Response to Comment Letter I198

198 Bryan Sperry

February 7, 2021

- |               |                                                                                                                                                                                                                                               |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>I198-1</b> | The City acknowledges the comment as an introduction to comments that follow.                                                                                                                                                                 |
| <b>I198-2</b> | Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to <b>Master Response 6.</b>                                                   |
| <b>I198-3</b> | Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to <b>Master Response 5.</b> |

I198-1

I198-2

I198-3



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Comment Letter I199

From: Bruce A. Bergman <bruceb@fatcity.com>  
Sent: Monday, February 8, 2021 1:54 PM  
To: DSD EAS <DSDEAS@sandiego.gov>; Bruce Bergman <bruceb@fatcity.com>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Hello --

I am a Carmel Mountain Ranch resident and owner (since 2010), and I would like to express my concern over this project, and the EIR which has been filed. Upon review, it is my belief that this EIR is incompatible with the community character, environmental impact, and transportation impact that one would expect of a developer interested in this project.

Environmental impact

Substantial environmental damage will occur if this project is approved. The EIR is incorrect in many respects. The project will cause the destruction of community character, loss open space and park areas, increased wildfire and disaster risk, substantially increased evacuation risk, reduced air quality, and an unacceptable level of gridlocked traffic. The EIR lacks adequate CEQA options and mitigations, and even recognizes the large number of unacceptable environmental impacts.

Increased evacuation problems

Egress and evacuation from Carmel Mountain Ranch in the event of a wildfire (or other disaster/emergency) will be extremely difficult, and could result in the loss of lives and property. The proposal of this project estimates 1,200 new homes and more than 3,500 residents, including all of their vehicles and belongings. This will further increase the current dangerous situation to unacceptable levels. Property will suffer because people will be unable to leave the area in a timely manner, and it this would also cause deaths and hospitalization for those who cannot leave safely and timely. In San Diego, our wildfires usually come the East during windy Santa Ana conditions, and the Eastern community to Carmel Mountain Ranch are prone to wildfires. Though we do have several freeways, these roadways will be overloaded by residents fleeing other large nearby communities to the North, West, and East, including Rancho Penasquitos, Poway, Rancho Bernardo, Ramona, Julian, Escondido, San Marcos and others.

Transportation

The proposed project will incur a huge increase in traffic in our area, and in North County San Diego in general. Their EIR even concedes that transportation impacts are undeniable and not able to be addressed with this development. This despite the fact that they claim the transit center is nearby (it is not; they measured from an incorrect starting location that was convenient for them). Even today, traffic is often stopped on our roadways, surface streets, and freeways (especially during commute times), and this compounds an already serious problem. The developer cannot offer a solution to this issue, and combined with the increased evacuation problems, this is a recipe for disaster. The EIR states that the transit station is located near a convenient corner of the project, the proposed project would still result in an increase in density above what is currently zoned for the site. It is clearly misleading and incorrect for them to say that the project is within a "Transit Priority Area."

I urge you to consider our concerns, and to recommend that the developer resolve ALL community concerns and impact statements before being adopted.

Respectfully,  
Bruce Bergman  
Joy Bergman  
Cassandra Bergman  
Isabella Bergman  
13856 Stoney Gate Place  
San Diego, CA 92128-3655  
858-829-2456  
bruceb@fatcity.com

1

Response to Comment Letter I199

199 Bruce Bergman and Family

February 7, 2021

I199-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to Master Response 3. The comment addresses subject areas, which received analysis in the Draft EIR.

I199-2

Comment noted.

I199-3

Refer to **Response to Comment I199-1** regarding community character and traffic. Refer to **Response to Comment 02-11a** regarding open space.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas,

which received analysis in the Draft EIR.

- I199-4** It is unclear from this comment what alternatives and mitigation measures were inadequate, and, therefore, no specific response can be provided or is required. However, refer to **Master Response 10** regarding the process for developing project alternatives. As to the unavoidable environmental impacts identified in the EIR, the City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a) (3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project.
- I199-5** Refer to **Response to Comment I199-3** and **Master Response 5** regarding evacuation. Additionally, as determined in Section 5.2, Transportation, and Section 5.19, Wildfire, of the Draft EIR, the proposed project would provide adequate emergency access to the project site.

**I199-6** Refer to **Response to Comment I199-1** regarding traffic. As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a)(2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

**I199-7** Comment noted.

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Comment Letter I200

**From:** Huang, K Chris CIV USN COMNAVAIRSYSCOM PAX (USA) <kuowei.huang@navy.mil>  
**Sent:** Monday, February 8, 2021 6:45 AM  
**To:** DSDEAS@sanidiego.gov  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch, 652519/SCH No. 2020039006

To City Council and Committee,

I have a grave concern to the New Urban West development plan at Carmel Mountain Ranch, CA 92128.

Residents decided to settle into one neighborhood based on the existing community setup and offering, in proportion to the paid purchased price. In this case, the fair market value I paid was based on Carmel Mountain Ranch's quality of living, available open space and traffic loading.

Land owner and city are entitled to re-purpose the existing zoning and usage, but it needs to be thoroughly assessed and mutually agreed on. I am sure you can related that no matter how legally sounded and novel the justification is, you don't see and you don't easily agree to your neighbor's house get converted into a clinic, a church, a nursing home.

I understand you want to bring revenue for the city. What differentiate us San Diego from some other cities is that we can do so while also build and add values to the city. I sincerely ask you to put yourself as a resident of the community and serve in the best interest of the local residents and San Diego

Best Regards,  
Chris Huang  
14857 Gable Ridge Rd.  
San Diego, CA 921328

Response to Comment Letter I200

200 Chris Huang

February 7, 2021

- I200-1** The City acknowledges the comment as an introduction to comments that follow.
- I200-2** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not a physical change to the environment.
- I200-3** Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.
- I200-4** Comment noted.

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Comment Letter I201

From: Martin Teal <marty.teal@sbcglobal.net>  
Sent: Sunday, February 7, 2021 8:47 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] EIR Comments – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern:

I have two comments about the EIR:

1) The Project Objective 1, Section ES.3 is not met. The range of housing types are not compatible with the adjacent established residential communities.  
• The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%. The Trails consist of 70% Apartments, Carmel Mountain Ranch has 24%. Carmel Mountain consists of about 52% single family homes, The Trails, 0 single family homes.  
• The Trails at Carmel Mountain Ranch proposes building heights at 37' and 48' with minimum building setbacks at 50ft from the property lines of existing 2 story homes.

2) I did not find the Geomorphic Report by Chang Consultants (also called the SCCWRP report) that was referenced in the Appendix E Drainage study and also in Appendix S Stormwater Study (e.g., see Section 3.2, 4.1) among the documents provided for review. As a trained geomorphologist I am highly skeptical of the findings that Chicarita Creek is of "low erodibility." From my personal observations, sections of the creek have been highly eroded by existing urban runoff, and other sections are highly susceptible to further erosion. Therefore, the recommended biofiltration and other hydromodification mitigation measures for low erodibility channels will be inadequate for high or even medium erodible channels.

Thank you for your attention to these matters.

Sincerely,

Martin Teal, P.E., P.H., D.WRE, F.ASCE  
11975 Brewster Court  
San Diego, CA 92128

Response to Comment Letter I201  
201 Martin Teal  
February 7, 2021

I201-1 The City acknowledges the comment as an introduction to comments that follow.

I201-2 The lack of inclusion of single-family housing or inclusion of apartments at a rate higher than the overall community does not equate to an incompatibility with the adjacent established community. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

In regard to housing types, a variety of building types (townhomes, garden walk-ups, stacked flats and apartments, among others) would be provided in the community, with a mix of for-sale, rental and age-restricted product to serve a diverse and mixed population and household size. A variety of architectural styles would be allowed across the neighborhoods, so long as a consistency is established at each planning unit neighborhood to help define a sense of place. Therefore, the project would provide a variety of housing types, and therefore meets Project Objective 1. The comment addresses a subject area, which received analysis in the Draft EIR.



- I201-3** The adequacy and appropriateness of water quality features of the project were addressed by a qualified Registered Professional Engineer (Chelisa Pack) as well as the City Engineer. This information is documented within Appendix S, Stormwater Quality Management Plan (See Attachment 1 and 2). Regarding the Geomorphic Report mentioned by the commenter, this assessment report was included as Attachment 2c of the Stormwater Quality Management Plan (EIR Appendix S). As described in Appendix S, the Geomorphic Assessment determined that the channels, including Chicarita Creek, had a low susceptibility to erosion. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I202

From: Maria Schneider <supermo55@hotmail.com>  
Sent: Monday, February 8, 2021 6:58 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Cc: Troy Daum <troy@wealthanalytics.com>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Maria Schneider  
13824 Stoney Gate PL  
San Diego, CA 92128

Dear Mayor Todd Gloria, and San Diego Council Members,

As a long time resident of Carmel Mountain Ranch, (almost 24 years), and a person who believes in a Green America, the current development of the Trails, as currently planned, has an issue of instead of reducing "green house gases" by 40% by 2030, the density proposed will increase our pollution and air quality. Also losing much open and green space for the community.

I am hoping that you all realize that the Trails, is not the only new development in our area... Less than 1 mile from Carmel Mtn, in fact just going up Carmel Mtn Road, from Rancho Carmel Drive, the Lennar Pacific Village has 1400 new homes developed and almost completed. Not to mention the other Rancho Penasquitos Housing Development where the Karlan DoubleTree Hotel used to be with the area of the DoubleTree Golf course as well.... That will increase the density of population immensely.

Also, there is a Merge 56 project West of Rancho Penasquitos near Camino Del Sur...When looking at each of these projects individually, you might not get a clear picture of how close each of the separate projects are to each other and the increase in "Green House Gases" and population density that they will cause. Also, another project is in Mira Mesa, just as a reminder, Mira Mesa Rd is just 3 exits south of Hwy 56... which is connected to Carmel Mtn Ranch... I know, because where I live is literally one block off of Ted Williams/Hwy 56....

There are many shopping malls, that have lost many retail stores, and in Northern California, specifically Silicon Valley, they have incorporated housing and shopping malls... Which reduces "green house gases" due to many occupants of housing attached to shopping malls, can actually work and shop without having to drive to another location... Win, win!

I also hope in order to have more affordable housing for many San Diegan's, that having existing apartment complexes, to have 15 percent of their apartments to be used as low cost housing. A way to achieve this, is that when an existing renter who is paying a higher rent currently moves out, that the apartment complex then allows that open rental to be that of a low income housing option. Once each existing apartment complex reaches the correct percentage of low income housing and that of regular renters, that they then keep up the balance of regular rent and low income housing as tenants move in and move out. Another win, win to help expand the option for more and more people to have affordable housing in their community for people, such as teachers, police officers, firefighters, and medical personal.

Response to Comment Letter I202  
202 Maria Schneider  
February 7, 2021

I202-1

Greenhouse gas emissions are addressed in Section 5.7, Greenhouse Gas Emissions, and air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Greenhouse gas emissions and air quality impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**. Refer to **Response to Comment O2-11a** regarding open space.

Pollution-related topics include air quality, discussed in Section 5.3, Air Quality and Odor; greenhouse gas emissions, discussed in Section 5.7, Greenhouse Gas Emissions; water quality, discussed in Section 5.18, Water Quality; health and safety, discussed in Section 5.8, Health and Safety; and wildfire, discussed in Section 5.19, Wildfire, of the Draft EIR. All impacts associated with these environmental topics were determined to be less than significant. These are subject areas, which received analysis in the Draft EIR.

I202-2

The City acknowledges there are several cumulative projects in the vicinity, as identified in EIR Table 6-1, Cumulative Projects. Cumulative impacts were addressed in Chapter 6, Cumulative Effects, of the Draft EIR. Cumulative projects considered in the cumulative analysis include the Pacific Village project. The cumulative analysis did not include the Merge 56 project or the unidentified project in Mira Mesa stated by the commenter. These projects were not included in the cumulative analysis due to the distance from the

I hope that you all take this information into consideration, and that with all these new and dense development plans for communities that already have increasing traffic issues, issues with crowded schools, and in our current situation of COVID-19 pandemic, that having a population with less open space as we see currently, and a more dense population causes increases in communicable diseases, like the one we are in right now.

Thank you for your time and consideration,  
We just need to do what's best for everyone, and learn from past mistakes, and learn to "think outside of the box"

Sincerely,  
Maria Schneider  
13824 Stoney Gate PL  
San Diego, CA 92128

I202-5  
Cont.

- I202-3** Refer to **Response to Comment I202-1** regarding greenhouse gas emissions.
- I202-4** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. The provision of and eligibility for affordable housing is not a physical change to the environment.
- I202-5** Traffic is discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.
- Refer to **Response to Comment O2-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I203

From: Marcie Milner <milner.marcie@gmail.com>  
Sent: Monday, February 8, 2021 3:35 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Cc: troy@wealthanalytics.com  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear E.Shearer-Nguyen,

As a resident and homeowner in Carmel Mountain Ranch, I am writing to address concerns with the EIR associated with the above referenced project. My husband and I purchased our property in 2001 because we wanted to live in a planned community with single family homes. The project, as proposed, would dramatically change our neighborhood, creating additional traffic, imposing burdens on our schools, and unnecessarily impacting the neighborhood infrastructure. Specifically, the proposal has not met Objective 1, Section ES.3 - The range of housing types proposed are not compatible with the adjacent established residential communities.

• The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%.  
The Trails consist of 70% Apartments, Carmel Mountain Ranch has 24%.

Carmel Mountain consists of about 52% single family homes, The Trails, 0 single family homes. • The Trails at Carmel Mountain Ranch proposes building heights at 37' and 48' with minimum building setbacks at 50 ft from the property lines of existing 2 story homes.

Further, the developer has not provided a precise site development plan showing building pads and roadways prohibiting a thorough community and city analysis of the project overall. Therefore, analysis and interpretations by the City and others may not be accurate.

There are currently thousands of apartment units at Mira-Mesa and the I-15, and multiple high density housing projects already under construction in the I-15 corridor. The city's need to address affordable housing, should not consist of approving every project that comes before it without thoughtful consideration. As a homeowner in San Diego, I am not opposed to growth - and believe our neighborhood could accommodate additional single family homes. However, the Trails at Carmel Mountain Ranch, as proposed, goes way beyond what the Carmel Mountain Ranch neighborhood was zoned to support.

Sincerely,  
Marcie A. Milner  
13827 Lewiston Street  
San Diego, CA 92128

Response to Comment Letter I203  
203 Marcie Milner  
February 7, 2021

I203-1 The City acknowledges the comment as an introduction to comments that follow.

I203-2 Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant utility infrastructure impacts with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

I203-1  
I203-2  
I203-3  
I203-4  
I203-5

**I203-3** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

In regard to housing types, a variety of building types (townhomes, garden walk-ups, stacked flats, and apartments, among others) would be provided in the community, with a mix of for-sale, rental and age-restricted product to serve a diverse and mixed population and household size. A variety of architectural styles would be allowed across the neighborhoods, so long as a consistency is established at each planning unit neighborhood to help define a sense of place. Therefore, the project would provide a variety of housing types, and therefore meets Project Objective 1. The comment addresses subject areas, which received analysis in the Draft EIR.

**I203-4** Chapter 3, Project Description, of the Draft EIR provides a summary of the proposed land uses and a Conceptual Site Plan. The project also includes Design Guidelines which prescribe the type and form of development to occur. Therefore, sufficiently detailed information has been provided to perform a thorough CEQA analysis.

**I203-5** Comment noted.

Comment Letter I204

From: Lori McCarthy <mccmrs@gmail.com>  
Sent: Monday, February 8, 2021 8:07 PM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Subject: [EXTERNAL] EIR - The Trails at Carmel Mountain Ranch, Project Number 65219/SCH No. 2020039006

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Ms. Shearer-Nguyen,

Had a chance to read the referenced EIR report.

As a mom and longtime resident, I've come to appreciate the thorough planning that's resulted in a safe and enjoyable neighborhood at CMR. Based on concerns for the safety of my family and community, allow me to comment on a few EIR issues that are important to the safety of the community.

The first is fire safety. Since Carmel Mountain Ranch is designated by our state as a Very High Fire Severity Zone, the EIR raises a serious issue with a likely increase in wildfire risk. We experienced the wildfires in 2003 and 2007 and appreciated the wisdom of the original planners for the Carmel Mountain community. Dedicated open areas and the golf course provided natural fire breaks, but such a barrier would be significantly limited to accommodate an additional 1,200 proposed units. Wildfire risk would be further heightened by the increased traffic impacts also cited in the EIR. Were we to have another required evacuation such as in 2003 and 2007 wildfires, there could be negative impacts to health and safety of CMR residents.

The EIR (pg. 405) indicates that the pesticide use on the golf course/open space is a recognized environmental condition. It does not, however, detail the areas tested, nor quantify the environmental impact of 32 years of pesticide and herbicide buildup. The air quality section of the EIR is lacking and raises doubts as to air quality safety resulting from planned excavation and grading. The safety of our families should warrant a more detailed investigation and presentation of findings. There are further air quality concerns regarding fugitive dust generated during site work, grading, hauling and loading during construction. Potential risks to the respiratory health of the community should be fully and responsibly addressed before concluding that no mitigation is required. The information presented is insufficient to support the EIR conclusion that mitigation is not required.

Greenhouse gas release for the proposed project also appears incomplete. While the issue is addressed in the EIR, the GHG that would be released throughout development far exceeds the goals of San Diego's Climate Action Plan as well as California's goals. Again, the EIR is incomplete in this area and does not include the total amount of GHG for the 5 years of project construction. This issue should be more fully and accurately addressed.

The EIR is also lacking in critical factors of home security. Currently, golf course frontage residences have low fences separating homes from the open space. This open space that has been maintained and secured by the property owner and has been a safe environment from criminal elements. Elimination of such open space and replacement with public trails. Construction of new homes in the open space will decrease privacy and increase potential crime threats. Security threats would also be increased in the 8 pedestrian tunnels that will become public access. These areas were previously monitored, secured and kept free of homeless encampment and gang activity. There is no EIR planned mitigation for this reasonably foreseen issue.

Response to Comment Letter I204

204 Lori McCarthy  
February 7, 2021

- I204-1

The City acknowledges the comment as an introduction to comments that follow.
- I204-2

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I204-3

Potential contamination was addressed in Section 5.8, Health and Safety, of the Draft EIR. Soil tests and soil sampling have not occurred at this point; however, should any hazardous materials be encountered or otherwise be required to be removed, it would be done so in accordance with applicable regulatory requirements, which would ensure impacts related to hazardous materials would be less than significant. The Draft EIR determined that potential hazards related to soil contamination would be less than significant with compliance with applicable regulatory requirements and documents. Additionally, the Master HOA will be responsible for ongoing maintenance of all open space which would include trash removal and any graffiti abatement.

In summary, the lack of detail and plans for mitigation in the EIR have caused serious concern and do not warrant approval of the report supporting the 1,200 units proposed. There are many real impacts to the CMR community that have not been effectively addressed.

Respectfully ask that you focus attention on these issues with the EIR.

Sincerely,

**Lori McCarthy**

[McCarthyMedicalTrust@gmail.com](mailto:McCarthyMedicalTrust@gmail.com)

<https://youtu.be/TnpLr3k6-x0>

<https://www.facebook.com/haleyshopeforhealth/>

[gf.me/u/vwagv7](https://gf.me/u/vwagv7)

I204-6

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I204-4**

As stated in Section 5.7, Greenhouse Gas Emissions, the project would be consistent with the City's Climate Action Plan and not result in any significant greenhouse gas emissions impacts. Therefore, the project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing greenhouse gas emissions. Refer to **Master Response 8**.

**I204-5**

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Additionally, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Home security and crime are not physical changes to the environment.

**I204-6**

Comment noted.

Comment Letter I205

From: Loreen Arnold <LoreenArnold@outlook.com>  
Sent: Sunday, February 7, 2021 4:04 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Re: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 202003900

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To: The City of San Diego Development Services Center  
Attn: Environmental Planner

I am writing as a resident of Carmel Mountain Ranch in response to the environmental impact report for the proposed project on my community.  
I am very concerned about the impact that this project will in my beautiful neighborhood. A lot of thought and planning went into the design of this community in the beginning which included the open space previously used as a golf course which attracted so many to purchase homes in the area. It is my understanding that this project proposed by New Urban West consists of 1,200 units of which 60% are rental units. This type of housing and density does not fit in with the existing development. I am very concerned that this will have a negative impact on the traffic congestion and parking issues that already exist in the area. It is very difficult to find parking at the grocery store, home depot, and other existing shopping plazas at peak times as is. It is also concerning that the proposed project will create a brand new master association. I anticipate this will lead to a lot of angst and disagreements between residents of different areas of this small community when each have different rules to live by in the area.

The use of the open space in the community needs to be compatible and respectful of the existing properties. This project proposed by Urban West does not seem to fit and I don't see it being cohesive or blending in at all with existing housing. It does not seem to be a respectful use of the open spaces many including myself use and appreciate daily.

Sincerely,  
  
Loreen Arnold

Response to Comment Letter I205  
205 Loreen Arnold  
February 8, 2021

- I205-1The City acknowledges the comment as an introduction to comments that follow.
- I205-2Impacts regarding visual effects and neighborhood character are discussed in Section 5.17, Visual Effects and Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**.
- I205-3Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and parking.
- I205-4Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Creation of a new master association is not a physical change to the environment.
- I205-5Refer to **Response to Comment I205-2**.

I205-1  
I205-2  
I205-3  
I205-4  
I205-5



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Comment Letter I206

Response to Comment Letter I206  
206 Leo and Lela Foshansky  
February 7, 2021

From: Leo Foshansky <lfoshansky@yahoo.com>  
Sent: Sunday, February 7, 2021 7:31 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern  
The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006 is not acceptable  
We are totally against this project  
Please, reconsider it  
Regards  
Leo and Lela Foshansky  
11965 Meriden Lane  
San Diego, CA 92128

I206-1

I206-1      Comment noted.

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Comment Letter I207

From: Lee Lowell <lee14067@gmail.com>  
Sent: Monday, February 8, 2021 5:26 PM  
Cc: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To Whom It May Concern:

CITY EVACUATION PLANS

In reviewing numerous resources regarding the Proposed project, an important question is now being posed. Would the Project substantially impair an emergency response plan or emergency evacuation plan? I concur with my CMR neighbors that it indeed does.

Since 2003 and 2007, considerably more residents now live in the communities around Carmel Mountain Ranch. Residents of the area deserve a substantive fire evacuation study. This study should also include the cumulative impact of more than 3000 more residents in the Trails of Carmel Mountain Ranch. Offering less than a detailed analysis would represent a severe danger to the lives of CMR residents.

CREATES MORE URBAN SPRAWL

The EIR states: "the proposed project would introduce a population beyond what is planned for the project site."

The Sierra Club San Diego states: "The 1200 pro posed homes is excessive resulting in reduced quality community character, crowding, and high vehicle miles traveled."

The Sierra Club San Diego, conversely, would support a project of approximately 200 hundred homes that would be a mix of single family homes, multi-family homes, and rentals.

I certainly would support such a proposal.  
Thank you for your thoughtful consideration.

Sincerely,  
Lee Lowell  
14067 Carmel Ridge Rd.  
San Diego, CA 92128

I207-1

I207-2

Response to Comment Letter I207  
207 Lee Lowell  
February 7, 2021

**I207-1** Impacts associated with wildfire hazards and impairment of an adopted emergency response plan, as well as potential cumulative impacts, are assessed in Section 5.19, Wildfire, Section 5.8, Health and Safety, and Chapter 6, Cumulative Effects, of the Draft EIR. Wildfire and evacuation-related impacts, and cumulative wildfire and evacuation-related impacts, were determined to be less than significant. Refer to **Master Response 5**.

**I207-2** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Alternatives were addressed in Chapter 8, Alternatives, of the Draft EIR. Refer to **Master Response 10**. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I208

Response to Comment Letter I208

208 Laurence Fontaine

February 8, 2021

From: Larry Fontaine <larryfont@gmail.com>  
Sent: Monday, February 8, 2021 3:06 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch Project No. 652519 / SCH No. 2020039006

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This document previously sent, I believe an error occurred in sending.  
Thanks-

February 08, 2021

E. Shearer-Nguyen, Environmental Planner,  
City of San Diego Development Services Center,  
1222 1st Avenue, MS 501,  
San Diego, CA 92101,

Project No. 652519 / SCH No. 2020039006

Via e-mail to [DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov).

Dear Ms. Shearer-Nguyen and City Council:

I have been a resident of Carmel Mountain Ranch for twenty-nine years and **strongly oppose the proposed Trails at Carmel Mountain Ranch development as currently presented**. My home is on the former seventeenth fairway (now unit seventeen). I am very much in favor of smart development as the community now sits with unsightly broken fences surrounding the former course along with dead trees and vegetation. Residents are eager to see our community green and pleasant again and would find a proposed innovative development consisting of single and two-story homes with half the density of the current proposal very refreshing. Unfortunately, after lengthy plans and document(s) review, I find the latest draft EIR flawed in numerous sections. I wish to bring some to your attention. Kindly review:

**EIR Flaw- 6.1.19 Wildfire (Evacuation)**

Carmel Mountain Ranch is in a State-designated Very High Fire Severity Zone. Nowhere are evacuation times ever mentioned. Fire evacuation of the community itself (pdf page 603, 5.19 Wildfire; PDF pages 613-18, 5.19.3 Impacts Analysis. Issues 1-3) fails to take into account wind driven Santa Ana fires that can burn thousands of acres in hours. Carmel Mountain traffic will be gridlocked before ever reaching the suggested evacuation routes. For emergency evacuation, the EOP identifies I-15 and SR-56 as emergency evacuation routes in the vicinity of the project site. Portions of the project site are located adjacent to I-15 to the east and to the northeast of SR-56. Per the VMT Analysis (Appendix G to the EIR), the proposed project is anticipated to add 7,928 average daily trips to and from the project site." (pdf p 613), without further data or analysis.

1

**I208-1** The City acknowledges the comment.

**I208-2** The City acknowledges the comment as an introduction to comments that follow.

**I208-3** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I208-1

I208-2

I208-3

The EIR is deficient in that it does not adequately assess the risk of wildfire and erroneously concludes: *"The Project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Therefore, potential impacts related to wildfire hazards would be less than significant."* This statement is inaccurate and follows the disregard of the severity of a wildfire. The EIR mentions evacuations as briefly as possible and refers to city evacuation plans with no mention of any in depth city review (or of a second opinion of an organization not affiliated with the developer). **The EIR should be updated to analyze to I-15 and SR-56 evacuation routes, additionally, taking into account additional other local projects with high volume daily trips not included in the analysis.**

**EIR Flaw -5.11 – Noise (Exceeding Code Standards)**

Residential Mechanical Equipment includes heating, ventilation, and air conditioning (HVAC) equipment that can be a significant noise source. Each outdoor HVAC condenser unit has a sound emission source level of 74 dBA at 3 feet (Johnson Controls 2010). The design guidelines prepared for the proposed project specify a 50-foot setback/buffer between existing residential property boundaries and new buildings. Assuming an attenuation rate of 6 dB per doubling of distance and shielding that would break the line of site to the outdoor HVAC equipment, the noise level at the nearest receiving property line would be approximately 44.5 dBA during continuous operation, exceeding the San Diego Municipal Code residential noise level standard of 40 dBA between 10:00 p.m. and 7:00 a.m.

[The Impact to residents residing close to development]

The magnitude of a 4.5 dBA noise increase over ambient levels certainly should be addressed to determine the significance of change in noise levels. The EIR did not include an analysis, supported by substantial evidence, explaining why the magnitude of an increase in ambient noise, as opposed to meeting an absolute noise threshold such as 40 dBA, need not be addressed to determine the significance of the project's noise impact. The EIR does not provide a rational explanation for this approach to environmental change. Simply saying municipal code noise levels are going to be exceeded, no big deal, does not provide a rational explanation for why a 4.5dBA increase is insignificant.

In contrast, Exceeding SD Residential noise limits is a very serious issue, especially for young children. Studies indicate that excessive noise levels on children have physiological and psychological effects. The world Health Organization has published literature outlining cognitive function impairment relating to prolonged excessive noise levels. Without detailed site plans depicting specific locations of HVAC locations and definite specifications, the noise level could be significantly higher.

I208-3  
Cont.

I208-4

**I208-4**

Noise was addressed in Section 5.11, Noise, of the Draft EIR, including noise associated with heating, ventilation, and air conditioning (HVAC) operation. The Draft EIR determined that an increase in noise due to residential mechanical equipment would result in a potentially significant impact (**Impact NOI-2**). The Draft EIR thus provided mitigation measure **MM-NOI-2**, which reduced this impact to a less than significant level. Refer to **Master Response 4**.

The EIR should re-analyze long term noise impacts with the full development plans for each site.  
Special consideration should be included for noise-sensitive receivers such as children as nearly every unit is impacting the backyard of over 500 homes.

EIR Flaw 15088.5 – (Feasible alternative ignored.)

Excerpt from:

2020 California Environmental Quality Act (CEQA) Statute and Guidelines

#### 15088.5. RECIRCULATION OF AN EIR PRIOR TO CERTIFICATION

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that: (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented. (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.*

The proposed “no project alternative” does not meet project objectives and failed to investigate alternatives presented that included a vineyard/winery on much of the open space. Out of the ordinary...yes, however it would have possibly been an innovative model for many other community developers to follow. The vineyard option included Poway Unified schools having the opportunity to include an introduction to agriculture and climate change in the curriculum.

The best environmentally superior alternative would be to concentrate high density multi-story housing at the town center along Carmel Mountain Road and Units 5 & 6 near the TPA. The existing commercial zone should be re-zoned as multi-use and tall buildings (5-6 story) could be added without significant impact to surrounding residents. This plan could easily add more than the planned 1200 residential units with less overall impact and meet/exceed the baseline project in all 7 project objectives identified in Section 3.2.

I208-4  
Cont.  
I208-5

I208-6

I208-7

I208-8

I208-5

The noise analysis provided within Section 5.11, Noise, of the Draft EIR, assesses potential impacts on sensitive receptors throughout the analysis. Refer to **Master Response 4.**

I208-6

Comment noted.

I208-7

Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

I208-8

Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.



(1) Multi-family housing would be concentrated near the TPA (Units 5 & 6) and in the town center along Carmel Mountain Road.  
(2) Reduce development on ex-golf course units by 50%. Only develop 5 units (vs 9 baseline) and reduce impact to community with single family residences or 2 story townhomes.  
(3) Retain larger majority of ex-golf course as open, possibly the “vineyard proposal” along with space for a variety of learning activities by schools (examples, nature, agriculture and climate awareness).  
(4) Proposed would meet or exceed baseline for community plan compatibility.  
Climate & Transport) Proposed project would provide better access to public transit, lower the Vehicle Miles Traveled (VMT), and reduce the Local Mobility impact. Overall lower impact in Greenhouse Gas Emissions. Alternative proposed could potentially generate VMT per capita 15% below the regional average.  
**The EIR should consider taking additional time and effort to review alternative options as the (Innovative) Environmentally Superior Alternative.**  
**Much like my previous objection to noise, ignoring well prepared and thought out alternatives that were proposed and simply going to be ignored due to the fact proponents did not want to adopt it does not provide a rational explanation for why this decision should be the final judgement.**

Closing comment, greenhouse gas released from this project exceeds any GHG goals of the Climate Action Plans of the City of San Diego and State of California. The project will result in considerable increase in GHG even after some minor insignificant mitigations on the City of San Diego checklist are implemented. This project does not take us closer to the 1990 GHG levels, the goal of the City’s Climate Action Plan; it would not even come close to maintaining GHG at 2021 GHG levels. Finally, I fail to see a total amount of GHG generated during the many years of construction of this development.

The EIR is flawed in numerous areas, for stated reasons, I find the EIR flawed and ask for a recirculation with correct information prior to certification.  
**Key Thoughts:** Keep Residents Safe when wildfire strikes again- Keep our environment safe and Clean-  
Keep our children engaged to our climate and planet by innovative thinking. Thank You-

Respectfully,  
Laurence Fontaine  
11970 Eastbourne Road  
San Diego, 92128

I208-8  
Cont.

I208-9

I208-10

**I208-9** As stated in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR, the project would be consistent with the City’s Climate Action Plan. Therefore, the project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing greenhouse gas emissions. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8.**

**I208-10** Comment noted.

Comment Letter I209

**From:** Laura Hodges <lhodges@san.rr.com>  
**Sent:** Monday, February 8, 2021 5:08 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Troy@WealthAnalytics.com  
**Subject:** [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern:

The purpose of this email is to voice my concern regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. I have read thru a large amount of information regarding the proposal, and the following issues are most important to me:

1. The Poway Unified School District has long been one of the best school districts in Southern California, and was the reason my family chose to move here 25 years ago. Should the 1,200 units New Urban West is proposing to build be approved, how will our school district be able to maintain its standard of excellence with the accompanying significant increase in student population?

2. Another concern is the traffic and congestion. CMR is a master planned community. The shopping centers' parking lots are already full. Also if there is another fire like the 2003 Cedar fire or the 2007 Witch Creek fire. How can we ensure our community's families will be able to safely evacuate the next wildfire with the addition of 1,200 housing units in our immediate backyards?

Sincerely,

Laura Hodges  
 CMR Resident  
 14059 Stoney Gate Place  
 San Diego, CA 92128

Sent from [Mail](#) for Windows 10

I209-1

I209-2

I209-3

I209-4

Response to Comment Letter I209

209 Laura Hodges

February 8, 2021

**I209-1** The City acknowledges the comment as an introduction to comments that follow.

**I209-2** Impacts to schools are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

**I209-3** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking.

**I209-4** Wildfire hazards and evacuation-related impacts are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

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Comment Letter I210

From: Greg Cosgrove <gcosg@yahoo.com>  
Sent: Monday, February 8, 2021 6:03 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Cc: Troy@WealthAnalytics.com  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch / Project # 652519/SCH No. 2020039006os

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom it may concern,

I am writing to state my concerns regarding the proposed development known as The Trails at Carmel Mountain, the former Carmel Mountain Golf Course. My wife and I purchased our home in CMR in 1987 and have lived here for 33 years. One of the reasons for buying here, besides the great school district, was the concept of the Master Planned Development. It really was a well thought out plan, knowing where everything was going to be, schools, shopping, roads, housing developments, and the maximum amount of future development. I have attended most of the community meetings regarding the new proposed Trails project. From the very start, the developer never really addressed the impact of traffic congestion in Carmel Mountain based on the number of new homes. There are already existing issues with traffic. 1. The traffic on ramps to the I-15 freeway from Ted Williams Parkway and Carmel Mt. Ranch Dr. are already at gridlock during the morning and evening commute.

2. The addition of a new housing development, and 2 new proposed developments on the west side of the I-15 freeway, plus the proposed new 1,200 homes in Carmel Mountain Ranch, will over burden an already congested situation in the community. Please, reconsider the impact, both on our issues with traffic congestion, and the environmental impact of additional vehicles on our roads, that this new development will have on the residents of Carmel Mountain Ranch.

Thank you.  
Kristina and Greg Cosgrove  
10562 Rancho Carmel Drive

I210-1  
I210-2

Response to Comment Letter I210  
210 Kristina and Greg Cosgrove  
February 7, 2021

- I210-1 The City acknowledges the comment as an introduction to comments that follow.
- I210-2 Impacts to traffic and transportation are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. No improvements were identified for freeway ramp intersections. Vehicular queueing at freeway off-ramp intersections was evaluated in the LMA (Draft EIR Appendix C) for all analysis scenarios. No ramp queues exceeded storage capacity under any analysis scenario. The Transportation Study Manual does not require the analysis of ramp meters or freeway segments in the Local Mobility Analysis. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

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Comment Letter I211

From: kimiko yoshikawa <kyoshika@att.net>  
Sent: Saturday, February 6, 2021 2:48 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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"My wife and I are against the construction of the new housing units in our community.  
  
We have been living in this peaceful community for decades, and the new construction will cause more traffic which could increase the possibility of an unsafe environment for all.  
  
The development would hinder any peace that has been created over the years from the home owners, and the mix of rental properties within our community is not what we look forward to. "

Kimiko Yoshikawa

I I211-1  
I I211-2  
I I211-3

Response to Comment Letter I211  
211 Kimiko Yoshikawa  
February 6, 2021

- I211-1      Comment noted.
- I211-2      Impacts to traffic and transportation are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I211-3      Comment noted.

INTENTIONALLY LEFT BLANK

Comment Letter I212

**From:** Kerris Hardman <lovinlowtide@gmail.com>  
**Sent:** Monday, February 8, 2021 8:15 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Carmel Mountain Ranch

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Dear Council,

As sad as it is to see the CMR golf course close, it is even sadder to see what is proposed. When the homeowners purchased here, the golf course was touted as additional open space, open space that was greatly needed in a very dense master plan.

There are other areas with infill projects that are maintaining the look and protecting the values of the neighborhood. Why aren't we also offered nice, large single family homes with park areas instead of cramming 1200 unit multi stories into a neighborhood where the shopping centers already are crowded and there is no parking?

Please do not ruin our neighborhood with this dense plan. We have apartments and condos aplenty. What we need is more open space. What we can accept are additional single family homes in keeping with most of the area around the golf course.

I doubt you can find a single CMR homeowner who doesn't think this is a terrible plan. Please go back to the drawing board and consider the area's citizens whose life savings are invested in their homes.

Sincerely,

Kerris Hardman  
 Former Salesperson in CMR for Presley and Lyon Homes

I212-1

**Response to Comment Letter I212**

**212 Kerris Hardman  
 February 8, 2021**

**I212-1**

Refer to **Response to Comment 02-11a** regarding open space. Refer to **Master Response 3** regarding parking. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.



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Comment Letter I213

From: Karuna Jay <kjaycj@gmail.com>  
Sent: Saturday, February 6, 2021 7:45 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Homeowner comments: Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Distinguished Environmental Planner  
City of San Diego Development Services Center

Hello,

We are writing this email to express our serious concerns with the proposed development - Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006, at Carmel Mountain Ranch (CMR). We join thousands of homeowners at CMR that are strongly opposed to this proposed new development in our neighborhood, by New Urban West. The VERY LAST thing that CMR needs is further density of homes and dwelling units, adding to our already heavily dense neighborhoods. This proposed new development will:

- Cause significant traffic jams and traffic density on our surface streets, access to Ted Williams Pkwy, Interstate 15 and other key traffic arteries.
- Further over-congest our already extremely congested Carmel Mt Rd and all of the surrounding shopping areas.
- Increase congestion and stress on our local schools.
- Cause greater strain on our environmental resources - water being among the most precious and scarce.
- Bring additional transient foot and motor traffic into our neighborhoods with the creation of public trails, leading to greater propensity for theft and vandalism.
- With the influx of additional and mixed use residential development - the potential to reduce real estate values throughout CMR due to the above grave concerns.

Please, please - we respectfully ask that you please consider the strong feelings and sentiments of thousands of CMR homeowners such as myself, that have serious concerns about this proposed new development and not wishing to have this proposed new development in our neighborhoods. Please let us collectively respect our land and our scarce resources and not allow further urban development to take place, in our precious CMR where we live and work and take walks with our pets and our children. Please allow the thousands of seriously-concerned voices to be heard and be respected.

Sincerely,

Karuna Jay  
Homeowner at : 11945 Danvers Cir  
San Diego, CA 92128

Response to Comment Letter I213

213 Karuna Jay  
February 6, 2021

- I213-1
- The City acknowledges the comment and notes it provides an introduction to the comments that follow.
- I213-2
- Impacts to traffic and transportation are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I213-3
- Schools are assessed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I213-4
- Impacts to the public water system, as well as water supply and conservation, are addressed in Section 5.15, Public Utilities, of the Draft EIR. As discussed in this section, impacts to water resources and water supply were determined to be less than significant. The comment addresses a subject area, which received analysis in the Draft EIR.
- I213-5
- Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment.

- I213-6** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not a physical change to the environment.
- I213-7** Comment noted.

Comment Letter I214

From: julie garcia <garcia0004@sbcglobal.net>  
Sent: Monday, February 8, 2021 9:10 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project The Trails at Carmel Mountain Ranch Project #652519/SCH No. 2020039006

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New Urban West's planned 1,200 units and density will forever change the community of Carmel Mountain Ranch whose community plan was built around the golf course.

Some of our concerns:

Transit Priority Area Designation misleading due to limited routes

- TPA criteria that the city is using to increase density around transit sites is misleading in this case. Only proposed units 5 and 6 are walking distance of the Sabre Springs/Penasquitos Transit Station and the bus route support is limited to the Downtown San Diego employment area. There are no known future Light Rail connections planned and the station was constructed as a drive-to park and ride for downtown workers.

Proposed Project is not cohesive with existing properties

- CMR consists of mainly single family homes, this project does not contain any single family homes.
- This project infills former golf fairways throughout the CMR community of homes that were built around the golf course specifically. This golf course does not have "normal, wide-expanse" fairways that are buildable.

Traffic, Wildfires

- There will be an increase in traffic on our small residential streets and flow out to already congested streets in the area which is a problem for evacuation during a wildfire.
- Also, there has been no consideration regarding traffic and congestion at retail areas taking into account the new housing developments across I-15 in Rancho Penasquitos. Those residents will use the freeway on/off ramps, shops and use services located in CMR. The density for the area will be affected by those new developments as well and must be taken into consideration.

We trust the city will make decisions that are in the best interest of the existing community and will take into account residents concerns and comments.

Thank you,  
Julie and Mike Garcia  
14413 Seabridge Lane  
San Diego, CA 92128

Response to Comment Letter I214  
214 Julie and Mike Garcia  
February 8, 2021

- I214-1** The City acknowledges the comment as an introduction to comments that follow.
- I214-2** As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a)(2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.
- I214-3** Impacts related to visual effects and neighborhood character are addressed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I214-4** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- Wildfire hazards and evacuation impacts are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.
- I214-5** Cumulative impacts are discussed in Chapter 6, Cumulative

Effects, of the Draft EIR and cumulative traffic was analyzed in the Local Mobility Analysis (Draft EIR Appendix C). Due to the variety of surrounding land uses and varying trip purposes throughout the day, cumulative project trips disperse throughout the roadway network, and not all trips generated by ongoing and proposed developments pass through the study area. Refer to Table 6-1 for a list of Cumulative Projects, which were considered in the Draft EIR. As no specific issue with the analysis was identified by the comment, a more specific response is not required.

**I214-6** Comment noted.

Comment Letter I215

**From:** Juliane Howes <julianehowes@gmail.com>  
**Sent:** Sunday, February 7, 2021 4:46 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project name: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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February 7, 2021

E. Shearer-Nguyen, Environmental Planner,  
City of San Diego Development Services Center,  
1222 1st Avenue, MS 501  
San Diego, CA 92101

Via email to DSDEAS@ [sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

Dear Ms. Shearer-Nguyen and City Council:

I am writing to you to express my deep concerns about the proposed project, "The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No.2020039006" as presented in the current form of 1200 units in the Environmental Impact Report. To be clear, I do not oppose all development in the areas formerly occupied by the golf course. It is my opinion that the current project, as presented in the EIR, simply causes far too much environmental and community harm. A smaller project of between 100-140 mostly single family units (including a larger percentage of low income units) compatible with what is currently present in Carmel Mountain Ranch (CMR) would not cause these issues and would have my full support.

I am a twenty-five year resident of Carmel Mountain Ranch and have three major concerns about the project as presented in the EIR:

- When we purchased our home in 1995 we did so after carefully reviewing the Master Community Plan approved by the City of San Diego. A key part of our decision to purchase was the promise provided by the City through the master planning process that this community would be one with "green spaces" and "open spaces" sprinkled throughout the many neighborhoods and streets that compose CMR. These green spaces included both the manicured golf course areas and also many natural open space areas.
  - The project as presented in the EIR is in direct violation of the character of the community of CMR presented in the Community Plan. The project removes the vast majority of these "green" and natural "open" spaces and fills them with concrete, asphalt and high density, high rise buildings completely inconsistent with the community plan. The current zoning designation of AR-1 does not support this development.
  - There are many areas within the 92128 community that could be utilized for high density residences that would not cause the significant environmental issues that are created from "The Trails" proposal. These areas include retail areas, empty lots, parking lots and vacant commercial facilities. The City of San Diego needs to explore all of these options prior to violating the promises made to the thousands of CMR residents via the approved Community Plan. If community plans can be violated and green spaces "paved over", what is the purpose of the planning department or community plans in general?

I215-1

I215-2

I215-3

I215-4

**Response to Comment Letter I215**  
**215 Juliane Howes**  
**February 7, 2021**

- I215-1** The City acknowledges the comment as an introduction to the comments that follow, and notes it expresses general project opposition.
- I215-2** Refer to **Response to Comment 02-11a** regarding open space.
- I215-3** Impacts related to visual effects and neighborhood character are addressed in Section 5.17, Visual Effects and Neighborhood Character, in the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I215-4** Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

- The spaces formerly occupied by the golf course and the open spaces included in this proposal are currently home to diverse plant and animal life including those who are federally protected like the Coopers Hawk and yellow Warbler (pictures below were taken on Stoney Gate Place off of what was formerly the #7 fairway).
  - The development presented in the EIR would cause significant and long lasting harm to the viability of these plant and animal species. Once again, the type and density of development presented in the report is incompatible with the long term viability of these species. The proposed human population increase of 25% (plus the associated carbon emitting vehicles) will drive these beautiful creatures from their habitats and will lead to species diversification reduction in the long term.
- Our home on Stoney Gate Place is currently in a state-designated "Very High Fire Severity Risk Zone". Even though our CMR community was spared in the Cedar fire of 2003 and the Witch fire of 2007, evacuations were ordered in our community during the 2007 fire and were a disaster. We are located almost directly off Ted Williams parkway, it took almost an hour for us to evacuate our home in our car—the same distance we would normally cover in about 2 minutes.

- Adding an additional 25% human population could have devastating consequences and result in a loss of life. There is simply no way to "mitigate" this concern. Additionally, the increased population proposed in "The Trails" increases the risk of fires created by human activity.
- While the developer does promise to engage fire "mitigation" fires fueled by Santa Ana winds can rapidly travel to residences and structures that were not built with these mitigations (sprinklers, etc). The increased population will create additional traffic during wildfire evacuations and I have real fears of people dying in their cars while attempting to evacuate similar to what happened in the Cedar fire when 10 people perished in their vehicles.
- The traffic studies specific to this development occurred during the "time of COVID". Because a vast majority of CMR residents have worked from home and children have not been on-site at schools, these traffic reports are meaningless when we all return to a "post-Covid" environment.

Although there are many parts of this proposed development that I have significant concerns about, these "big three", inconsistency with the Community Plan, irreputable harm to plant/animal life and increased fire risk including loss of life offer me no choice but to object to the proposal as presented. I welcome the opportunity to review an EIR for a development proposal that takes into account these concerns as well as reduces the size and scope of buildings in these "open" and "green" spaces.

Sincerely,

Juliane Howes  
Fairway Village  
13809 Stoney Gate Place

I215-5

**I215-5**

Impacts to biological resources, including special-status wildlife species, were addressed in Section 5.4, Biological Resources, in the Draft EIR. No direct impacts to special status wildlife species would result; however, indirect impacts may occur, as discussed in this section of the Draft EIR. The Draft EIR included mitigation measure **MM-BIO-1**, which reduces impacts to special-status wildlife species to a less than significant level.

I215-6

**I215-6**

Wildfire hazards and evacuation impacts are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I215-7

**I215-7**

Since July 1, 2020, level of service is no longer the applicable standard for transportation analyses in CEQA documents, and as such, traffic increases along roadway segments no longer serve as a basis for determining whether a project may cause an impact. However, for clarification, roadway and intersection traffic counts for the Local Mobility Analysis (Draft EIR Appendix C) were taken in 2019, prior to the COVID-19 pandemic. Transportation/circulation impacts are discussed in Section 5.2, Transportation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I215-8

**I215-8**

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated.

Comment Letter I216

Lilli Renier

From: Shearer-Nguyen, Elizabeth <EShearer@sandiego.gov>  
Sent: Monday, February 8, 2021 3:39 PM  
To: Alexandra Martini; Carey Fernandes; Jonathan Frankel  
Subject: Trails at Carmel Mountain Ranch - Comment Letter (Joseph Marsella)

-----Original Message-----  
From: Joseph Marsella <aquamanlovesmera@gmail.com>  
Sent: Sunday, February 7, 2021 10:43 PM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch

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To Whom It May Concern:

This letter is in regards to the proposed development labeled The Trails at Carmel Mountain Ranch., Project # 652519/SCH No. 2020039006 My name is Joseph Marsella. I reside at 11905 Tivoli park Row, #3, San Diego, 92128. I have been a resident of Carmel Mountain Ranch for the past 17 years. This community has worked very hard to maintain a safe, family friendly, and beautiful environment for all of it's residents. The inclusion of the above mentioned development would destroy many of the efforts put forth by our current Residential Community Association. Carmel Mountain Ranch is a small community that has always had a plan on maintaining the beauty and integrity of it's infrastructure. The addition of the proposed houses and apartments concern us for a number of reasons. As a long time resident, I would like to present some of the concerns I have.

\*The number of people that will move into the limited space of CMR. Over the years, I have seen the population of our small community grow, and with it came increased trash, traffic, and noise. The increased density of having additional homes placed in between existing homes and condominiums would double, perhaps triple the amount of traffic and noise. My condominium overlooks what used to be Hole 10 of the golf course, and there is a plan to built multiple apartment buildings behind me. There is only one way out of that area, and with houses already existing in that area, there will be no way for cars to leave the new units except right past the condos on Tivoli Park Row. This also presents an increased traffic problem for Carmel Ridge Road. I know our new mayor's plan is for people to use public transportation more, but we unfortunately, lack access to public transportation. The recently added MTS structure is easily 2 miles from the proposed units. Our streets would have become more overworked and overcrowded.

\*We purchased our homes with a community plan in place. We bought her for the beauty and character that a master planned community provided. Now we are being told that we will no longer have any view, and that the proposed units/houses would be taller and intrusive of the surroundings.Carmel Mountain Ranch prides itself on its' beauty and serenity. That would all be gone when buildings that are too tall and too impacted with new residents are introduced into the plan. While this is not a valid argument, I propose that that is just not fair. What is valid is stating that a 1200 unit development is going to severely and negatively impact this community. With each of those units having 2-4 individuals in them, we are talking about a lot of people in a very small space.

\*What is the plan for fire safety? That many people crowded into a small space makes exiting and entering the community a real issue. If we are ever asked to evacuate during a wild fire, are we all going to make it out on 2 roads?

\*Will this new development have security? Or will you be providing money to the police and fire department to increase staff? With more people comes more crime. How do you plan on dealing with this?

Response to Comment Letter I216  
216 Joseph Marsella  
February 7, 2021

I216-1 The City acknowledges the comment as an introduction to comments that follow.

I216-2 Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Noise impacts were addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses a subject area, which received analysis in the Draft EIR.

I216-3 Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.



\*Are you providing the community with a new school? As a teacher, I know how impacted out schools are already. Surely, these new units will bring more children tot he area, and these children will require a school. Are the existing schools going to be able to handle this impact?

\*I am concerned that our community is losing most of its' open space. Will you be providing the entire Carmel Mountain Ranch community new parks and new resources to maintain the beauty of our community?

Overall, the proposed development is not good for the community and residents of Carmel Mountain Ranch. More is not better. Don't destroy our community .

Sincerely,

Joseph Marsella  
11905 Tivoli park Row #3  
San Diego, CA 92128  
858-776-5766

I 1216-6

I 1216-7

I 1216-8

**I216-4** Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I216-5** Impacts to police and fire protection services are addressed in Section 5.14, Public Services and Facilities, in the Draft EIR. As discussed in this section, impacts to fire protection and police services were determined to be less than significant.

**I216-6** Impacts to schools are addressed in Section 5.14, Public Services and Facilities, in the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

**I216-7** Impacts to parks and recreation facilities are addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to parks and recreation facilities were determined to be less than significant. Refer to **Response to Comment O2-11a** regarding open space. The comment addresses a subject area, which received analysis in the Draft EIR.

**I216-8** Comment noted.

Comment Letter I217

From: Jonathan Howes <jonathan.howes@gmail.com>  
Sent: Sunday, February 7, 2021 6:04 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project No. 652519/SCH No. 2020039006

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February 7, 2021

E. Shearer-Nguyen  
City of San Diego Development Services Center,  
1222 1st Avenue, MS 501  
San Diego, CA 92101

Via email to DSDEAS@ [sanidiego.gov](mailto:dsdeas@sanidiego.gov)

Dear Ms. Shearer-Nguyen:  
This message regards "The Trails at Carmel Mountain Ranch" (Project No. 652519/SCH No. 2020039006). While I am supportive of developing the currently abandoned golf course, I am not in favor of the current project plan. From my point of view, the nature and scale of the proposal is not in keeping with the Master Community Plan and has an adverse impact on the area. Within this neighborhood of single family homes, the high density, multistory proposal is both out of place and strains the current infrastructure and resources. The sheer number of proposed high density, high rise buildings threatens to overwhelm the roads, schools, and already overloaded shopping areas (especially parking lots) in Carmel Mountain Ranch.

I am most concerned with the project's proposed treatment of natural open spaces, replacing a significant percentage of open land with parking lots and high rise buildings with low margins between existing and new construction. My hope is that you and the City Council strongly consider balancing the need for additional, affordable housing with the nature and character of the neighborhood that I have called home for twenty-five years. Carmel Mountain Ranch and, indeed, San Diego remain desirable and livable because we have not followed the path of Los Angeles, filling every available open space with asphalt and apartments. I believe that balancing the number of occupiable residences with an environmental plan that supports and protects natural open space is important to any community and, in fact, our wellbeing.

Do we need more available housing? Yes. Are the shuttered greens of the golf course in Carmel Mountain Ranch a candidate for Mira Mesa's "Casa Mira View" style construction? No. I hope that you consider these comments in your review.

Best regards,  
Jonathan Howes  
13809 Stoney Gate Place  
San Diego, CA 92128

I217-1  
I217-2  
I217-3  
I217-4

Response to Comment Letter I217

217 Jonathan Howes

February 7, 2021

**I217-1** The City acknowledges the comment and notes it provides an introduction to the comments that follow.

**I217-2** Impacts related to visual effects and neighborhood character are addressed in Section 5.17, Visual Effects and Neighborhood Character, in the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Refer to **Master Response 1**, and Tables 5.1-2 and 5.2-3 of the Draft EIR, regarding land use compatibility and the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant utility infrastructure impacts with mitigation incorporated.

Schools were discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I217-3** Refer to **Response to Comment 02-11a** regarding open space. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Shopping and associated parking lots are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

**I217-4** Comment noted.

Comment Letter I218

**From:** John Cooper <neverenoughbricks@sbcglobal.net>  
**Sent:** Friday, February 5, 2021 12:11 PM  
**To:** DSD EAS <DSEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] EIR Input - Trails at Carmel Mountain Ranch, Project No. 652519 / SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Environmental Planning Staff,

I am writing to provide input regarding the Environmental Impact Report (EIR) for the following project:

- ☐ Project Name: Trails at Carmel Mountain Ranch
- ☐ Project No. 652519 / SCH No. 2020039006
- ☐ Community Plan Area: Carmel Mountain Ranch
- ☐ Council District: 5

5.17 Visual Effects/Neighborhood Character

The EIR does not adequately address the significant impact to Visual Effects/Neighborhood Character resulting from three and four story buildings being placed directly behind existing one and two story single family homes. The bulk, height and scale of the proposed development will result in significant impact, which will affect the entire community, not just the adjacent home occupants. For example, FIGURE 5.17-2, Photo H shows the current expansive open space view with distant hillsides. Replacing this with large blocks of three or four story buildings is very detrimental. An alternate plan with new building heights not exceeding adjacent building (i.e. two stories) would be less detrimental to the community.

5.3 Air Quality and Odor

The EIR does not adequately address the significant impact to localized Air Quality and Odor resulting from the proposed development. The proposed design guidelines only ensure thirty (30) foot buffer between new auto circulation/parking and existing properties. Many CMR residents relax on their back patios. These patios are located a significant distance from existing roadway vehicle exhaust and odors at the front of the homes. The proposed development would sandwich many hundreds of homes between existing roadways and new auto circulation/parking. This will be very detrimental to localized Air Quality and Odor. An alternate requirement for minimum auto circulation/parking setback of 75 - 100 feet would reduce the impact.

5.11 Noise

The EIR does not adequately address the significant localized impact to noise resulting from the proposed development. The combined effect of mechanical equipment noise along with vehicular engine and tire noise must be addressed. Many CMR residents relax on their back patios and enjoy the quiet along the current green space. The combined noise effects of the proposed development will be very detrimental and need to be mitigated. In addition to possible noise mitigation identified in the EIR, an added requirement for minimum auto circulation/parking and building setback of 75 - 100 feet would reduce the impact.

Thank you in advance for addressing these concerns in the EIR.

Sincerely,

John Cooper  
 12235 Eastbourne Road  
 San Diego, CA 92128

Response to Comment Letter I218

218 John Cooper  
 February 5, 2021

**I218-1** The City acknowledges the comment as an introduction to comments that follow.

**I218-2** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. The comment addresses subject areas, which received analysis in the Draft EIR.

**I218-3** Air quality is analyzed in Section 5.3, Air Quality and Odor, of the Draft EIR. As discussed in this section, the project proposes residential land uses, which are not uses that are associated with odor issues. Air quality impacts associated with vehicular traffic emissions are also addressed in this section of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

**I218-4** Noise impacts are discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

**I218-5** Comment noted.

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Comment Letter I219

**From:** John at JB Tech <jbts@earthlink.net>  
**Sent:** Saturday, February 6, 2021 9:05 PM  
**To:** DSD EAS <DSEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Regarding 'the trails' 652519

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

To whom it may concern,

NUW is proposing plans of high density, multi family housing which is in no way compatible with the existing Planed Development, the whole of Carmel Mountain Ranch which was built out decades ago and guided by the CMR Community Plan approved in 1984.

This Planned Development, "A place to live, work, and play" as represented by developer's sales agents was really a 'contract' of "Low to medium density" housing with future owners of property such as my family in 1984.

The proposed buildings, their height, occupancies, and close proximity to each other and the existing Planned Community residences violates the commitments made between owners and the city without residents approval. Each of us has an 'understanding' with the city which is that we live in this Planned Community as it was approved in 1984, not otherwise, and that we agree to support this community as it is described in the Community Plan by abiding the guidelines of the community CC&Rs, and respecting City regulations.

Thank you,  
 John Barth  
 11253 Timbergate Circle  
 Waterfield Laurels  
 858-485-1177

I219-1

Response to Comment Letter I219

219 John Barth

February 6, 2021

I219-1

Impacts related to community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Additionally, refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and the project's consistency the City's General Plan and the Carmel Mountain Ranch Community Plan.

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Comment Letter I220

From: Joe Rukaj <joerukaj@gmail.com>  
 Sent: Monday, February 8, 2021 4:13 PM  
 To: DSD EAS <DSEAS@sanidiego.gov>  
 Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern:

I'm writing to voice my concern over the proposed development - The Trails at Carmel Mountain Ranch.

There are quite a few issues, but I find these to be the most salient and worthy of your attention:

1) The proposed multi-story development is not compatible with the look and the specific topography of the area(s) of interest. Buildings that would soar amidst the surrounding 2 story private houses are out of place, downgrade community feel and will drive down the value of our homes. I'm not necessarily opposed to the stated height of the developments on principle. In fact, I think the surrounding communities in Carmel Landing, Carmel Summit and the Jefferson apartments are all very sensible and good placement for those types of developments. They are located towards the lower end of the slope in our hilly community, allowing for a peaceful coexistence. It stands to reason that any development in that area should not change the entire look that was otherwise thoughtfully planned out over 3 decades ago, and I am not confident that the stated plans will meet the objective of providing a range of housing types that won't change the complexion for the worse.

2) The former golf course used assorted chemicals, herbicides, petroleum and petroleum products, and I have significant concerns over the particulates that could be unearthed and be sent airborne. I regularly walk all around the neighborhood with my young children and dog all the time and have a healthy and safety concern. My son and wife are both asthmatic and are prone to respiratory ailments. Are we supposed to not walk in our own neighborhood for what would be months? It would be impossible for the developers to contain any airborne health concerns, and I respectfully ask that you consider the safety of the very air we breathe in our community.<sup>1</sup>

My address is:

14360 Seabridge Lane  
 San Diego, CA 92128

Our home is a stone's throw from the 1st hole. I'm hoping you take these concerns seriously and take the necessary precautions.

Thank you for taking the time to hear these concerns.

Respectfully submitted,  
 Joe Rukaj  
 917-648-6708

Response to Comment Letter I220

220 Joe Rukaj  
 February 9, 2021

**I220-1** The City acknowledges the comment as an introduction to comments that follow.

**I220-2** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

**I220-3** Impacts related to hazards and hazardous materials, as well as fugitive dust emissions, are addressed within Sections 5.8, Health and Safety, and 5.3, Air Quality and Odor, respectively. As discussed in Section 5.8, Health and Safety, as a condition of project approval, the project would be required to comply with the County of San Diego Department of Environmental Health Voluntary Assistance Program (DEH VAP), which would include the preparation and review of a Soil Sampling Plan and Hazardous Materials Contingency Plan. It was determined that potential hazards related to chemical disturbance and removal would be less than significant



with compliance of these regulatory requirements and documents. Impacts related to air quality likewise were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I220-4** Comment noted.

Comment Letter I221

Response to Comment Letter I221  
221 Jimmy and Jasmine Hu  
February 8, 2021

I221-1 Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding the project’s consistency with the City’s General Plan and the Carmel Mountain Ranch Community Plan.

From: Jim Hu <jittbh@gmail.com>  
Sent: Monday, February 8, 2021 1:00 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and City Council:

We strongly oppose the proposed Trails at Carmel Mountain Ranch Project. This Project is totally against the original Carmel Mountain Ranch Community Plan. Specifically, when we purchased the home under the assumption that the golf course and open space is here to stay.

Understand things can change and golf course business can fail; however, the zoning should be staying the same or something comparable should be replacing the golf course--NOT a dense multi-story construction to replace the open space. Recommend the City to deny the request in the current form.

Sincerely Yours,

Jimmy & Jasmine Hu

15176 Cross Stone Dr  
San Diego, CA 92127

I221-1

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Comment Letter I222

Response to Comment Letter I222  
222 Jeremy Briggs  
February 7, 2021

Lilli Renier

**From:** Shearer-Nguyen, Elizabeth <EShearer@sandiego.gov>  
**Sent:** Monday, February 8, 2021 3:31 PM  
**To:** Alexandra Martini; Carey Fernandes; Jonathan Frankel  
**Subject:** Trails at Carmel Mountain Ranch - Comment Letter (Jeremy Briggs)

-----Original Message-----  
From: Jeremy Briggs <jeremy.briggs9@gmail.com>  
Sent: Sunday, February 7, 2021 8:43 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Subject: [EXTERNAL] Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

Hello,

I am writing concerning the proposed 1,200 unit project in Carmel Mountain Ranch. After reading the the Environment Impact Report, my main concern is the high increase in population in such a small area of the city. Traffic, crime rates, and parking issues are all affected from overcrowding. Please consider the safety and overall well being our our community.

Thank You,

Jeremy Briggs  
CMR resident and PUSD teacher

Sent from my iPhone

I222-1

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking.

Refer to **Response to Comment 02-7** regarding public safety. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I222-1

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Comment Letter I223

From: Jan Stephan <jstephan5@yahoo.com>  
Sent: Saturday, February 6, 2021 7:25 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Carmel Mountain Ranch

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

It I am writing this to express my concerns about plans to build on the open space that was previously a golf course in CMR. The new plans do not take into consideration the original character of this beautiful development. They also will not provide a range of housing types, and will increase traffic and parking issues. This will be true in the neighborhood, as well as the commercial and retail areas.  
In addition, the health and safety of residents will be impacted by increased traffic, public access to trails and the proposed tunnels. There are many other important reasons to preserve the open space but I will leave it here for now. Thank you for your consideration,

Jan Stephan  
CMR resident since 1989  
14151 Stoney Gate Place  
San Diego, Ca 92128

[Sent from Yahoo Mail for iPhone](#)

I223-1

I223-2

Response to Comment Letter I223

223 Jan Stephan  
February 6, 2021

I223-1

Refer to **Response to Comment 02-11a** regarding open space. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

I223-2

Transportation hazards were addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation hazards impacts were determined to be less than significant. With regard to health from traffic, air quality and greenhouse gas emissions were addressed in Sections 5.3, Air Quality and Odor, and 5.7, Greenhouse Gas Emissions, of the Draft EIR, respectively. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**. Public access to trails is not an environmental issue area that is required to be analyzed under CEQA. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I224

From: J Barth <barthsd01@earthlink.net>  
Sent: Sunday, February 7, 2021 2:58 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch; Project #652519 / SCH #2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom it May Concern,

Regarding: [The Trails at Carmel Mountain Ranch; Project #652519 / SCH #2020039006](#)

I have many concerns regarding the proposed development project (The Trails) located in Carmel Mountain Ranch. However I will keep this brief and address only my biggest concern, which is the substantial impact that 1200 new housing units will do to our community.

Carmel Mountain Ranch is a Master Planned Community that was being built in 1984, which is the year that my husband and I purchased our home here. We live in Waterfield Laurels, which is the very first development that was built. I believe it took approximately 7 years to reach build-out. And we have been enjoying our community ever since.

The addition of 1200 homes will cause everything from roads to schools to shopping centers to become a complete nightmare.

Please view the attached aerial view of our shopping centers (Ralph's etc) which was taken by a drone in December of 2019. As the saying goes -- a picture tells a thousand words. This is what Carmel Mountain looks like; without adding any additional homes. We will no longer be a Master Planned Community and the result will be a total mess.

Please consider the consequences to our community. Thank you for your time and attention.

Jan Barth  
11253 Timbergate Circle  
San Diego, CA 92128  
(858) 722-9829



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

Response to Comment Letter I224

224 Jan Barth  
February 7, 2021

**I224-1** The City acknowledges the comment as an introduction to comments that follow.

**I224-2** Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Impacts to shopping centers are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

**I224-3** Comment noted.



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Comment Letter I225

From: Marianna Koehmstedt <1mariannak@gmail.com>  
Sent: Sunday, February 7, 2021 9:22 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] PLEASE DO NOT ALLOW - The Trails at Carmel Mountain Ranch Project Number 652519

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear City Official:

My name is James Koehmstedt. My wife, Marianna and I have lived at 12110 Waverly Downs Lane, San Diego, CA 92128 for the past 27 years. We love our community! We love that it is made up of 3400 single family homes, apartments and townhomes. We would like to voice why ***we are completely against the Trails project.***

Our community is already too congested. This project would exacerbate the already congested traffic flow. Our grocery stores, our parking lots, our main intersections are already overwhelmed and crowded.

When we first bought our home our mello roos dollars helped pay for extra classrooms to get our students out of mobile classrooms because in the early 1990's our schools were not set up to handle the increased student population. The Trails project would severely impact and create a need for more classrooms which would increase our taxes yet again.

Our Grocery stores are already overwhelmed as there are many times you can not get everything you need and have to make several trips a week which drives up costs.

Please listen to those of us who have lived here and taken great care of our community. Please do not allow these 1200 proposed units to be built. There has to be a different solution. Adding more people to an already overwhelmed area is not the right solution!

Sincerely,  
James & Marianna Koehmstedt

I225-1  
I225-2  
I225-3

Response to Comment Letter I225  
225 James and Marianna Koehmstedt  
February 7, 2021

- I225-1** The City acknowledges the comment, and notes it provides and introduction to the comment letter.
- I225-2** Traffic and transportation/circulation impacts are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/ circulation and parking.
- I225-3** Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Taxes and impacts to shopping centers are not physical changes to the environment.

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Comment Letter I226

**From:** Jackie Yim <jackiemym@gmail.com>  
**Sent:** Monday, February 8, 2021 6:02 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006 - OPPOSITION NOTICE

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

The purpose of this e-mail is to express my opposition to The Trails at Carmel Mountain Ranch (Project Number 652519/SCH No. 2020039006).

As a local homeowner, I do not support The Trails at Carmel Mountain Ranch project because of the following reasons:

- Increased density to our traffic and local shopping areas that are already crowded
- Public recreation areas would be reduced
- Loss of open space and park land
- Increase the risk of wild fires
- Increase the evacuation risk
- Massive risk in greenhouse gases
- Reduce air quality
- Proposed project construction is not compatible with existing homes
- Safety and privacy issues by opening trails to public access is a serious concern to my family and neighbors
- Public safety issues presented by tunnels is not addressed

Overall, this project would be a detriment to our community that we love and enjoy.

Thank you,  
 Jackie Yim  
 13737 Tradition Street  
 San Diego, CA 92128

I226-1

I226-2

**Response to Comment Letter I226**

**226 Jackie Yim**

**February 8, 2021**

**I226-1**

The City acknowledges the comment as an introduction to comments that.

**I226-2**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Response to Comment 02-11a** regarding parks and open space.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I227

Response to Comment Letter I227

227 Inese and JR Menvielle

February 7, 2021

From: inese pavars <inesebelle@yahoo.com>  
Sent: Sunday, February 7, 2021 8:03 PM  
To: DSD EAS <DSD EAS@sandiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCHO No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer- Nguyen and City Council:

We are current residents of Carmel Mountain Ranch. We purchased our home in 2012. The biggest reason why we moved here was because of the way the golf course was designed around and throughout the community. Homes were prior in this area, but we felt that it was a great investment. The air actually felt cleaner here. It was nice to go on walks with our little daughter and enjoy the open space. Our neighborhood was quiet. Very few cars came down our street. We started to settle in and really enjoy our community. We got to know our neighbors. Many had been homeowners here for over twenty years! It was always interesting to hear stories about how there were just a few homes back in the day. There were few complaints about growth, but always a comment here or there about how happy everyone was with the open space in the community.

In July of 2018, the Carmel Mountain Golf Course closed abruptly and unexpectedly. Life in Carmel mountain Ranch has not been the same since. The beautiful open space that was once the golf course is now a bunch of land filled with weeds and large holes in the ground. The entire area of what was once the golf course is surrounded by ugly gates with menacing signs. Many transients have made temporary homes throughout this desolate wasteland. We frequently find empty food containers and trash on my evening walks past the barricaded golf course. Our beautiful community feels caged. The air does not feel as clean as it once did. Carmel Mountain Ranch felt a loss in community as well. Many residents, fearful of the outcome of the proposed Trails at Carmel Mountain Ranch Project, have sold their homes in search of a community similar to the one now lost. This proposed project, in its current form, scares us as well.

When the community was built in the 1990's, an exception was made for having too few parks because of the large open/recreational space provided by the golf course was recognized as Parks and Recreation Open Space per the city guidelines and the Carmel Mountain Ranch Community plan. This proposed project would result in a massive loss of open space and recreational space. Despite the project's claim, the community will not gain any new open space, in fact, the proposed project will result in a net loss of open space of approximately 60%. They state that 2/3 of the property will remain open space. That statement is misleading because they are only counting the actual building footprints as development. Buffer zones, parking, shrubs, rocks, and barrier trees immediately adjacent to construction should not be counted as open space that is equal to true nature space for animals, solitude, and community enjoyment.

We are afraid of the impending danger of increased traffic. More development equates to more housing, which equates to more drivers. The addition of thousands of new cars to the existing roads put current and future Carmel Mountain Ranch resident lives in danger, especially when the project does not plan for new speed calming measures for existing dangerous roadways. Many commuters will begin cutting through residential streets as a way to save time. This puts our once quiet street at risk as well. As more cars drive through the once quiet neighborhoods rushing to work, our children are put in danger as they are walking to school. The once clean air will be further polluted with exhaust from the cars. Much of our beautiful wildlife is also put in danger from the increase of traffic. The residents of the community will have significant disruption in terms of noise and air pollution.

We oppose the proposed Trails at Carmel Mountain Ranch Project because it will cause substantial environmental and community damage. This proposed Project will also result in the loss of open space and parkland, reduced air quality, and danger from increased traffic.  
Respectfully yours,  
Inese and JR Menvielle  
Residents of 11877 Meriden Lane

I227-1

The City acknowledges the comment as an introduction to comments that follow.

I227-2

Refer to Response to Comment O2-11a regarding parks and open space.

I227-3

Transportation, including transportation hazards, were addressed in Section 5.2, Transportation/Circulation, of the Draft. Transportation hazards impacts were determined to be less than significant. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Regarding transportation hazards, the project does not include any elements that could potentially create a traffic hazard for motor vehicles, bicycles, or pedestrians. The proposed circulation system is designed to interconnect with the existing adjacent public street system and discourage cut-through automobile traffic. Access points would not create a hazard for vehicles or people entering or exiting the site. Therefore, the project would not result in a hazardous roadway design or unsafe roadway configuration; place incompatible uses on existing roadways; or create or place curves, slopes, or walls that impede adequate sight distance on a roadway. The comment addresses subject areas, which received analysis in the Draft EIR.

**I227-4** Air pollution was addressed in Section 5.3, Air Quality and Odor, and Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.

Biological resources, including wildlife, were addressed in Section 5.4, Biological Resources, of the Draft EIR. Biological resources impacts were determined to be less than significant with mitigation incorporated.

Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses a subject area, which received analysis in the Draft EIR.

**I227-5** Comment noted.

Comment Letter I228

**From:** HR Tagh <hrtagh@hotmail.com>  
**Sent:** Monday, February 8, 2021 3:52 AM  
**To:** DSD EAS <DSEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Objections to the proposed Trails at Carmel Mountain Ranch Project

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Feb 7, 2021

E. Shearer-Nguyen, Environmental Planner  
 City of San Diego Development Services Center  
 1222 1st Avenue, MS 501, San Diego, CA 92101

Dear Ms. Shearer-Nguyen and City Council:

I'm a property owner at Carmel Mountain Ranch (CMR). I'm writing you with great concern to express my opposition to the proposed Trails at Carmel Mountain Ranch Project. Not only does the project destroy my existing view and open space behind my house which was one of my main reasons for making the investment in this property over 30 years ago, it fundamentally and suddenly changes the character of the neighborhood, introduce congestion and safety issues and it violates a number of rules. I'm very dismayed at how this has happened and fear its deficiencies will result in loss of quality of life as well as bring down property values. I hope you will reject this very high density project and instead only allow a much more modest project that preserves the character of the neighborhood and maintain or increase green space and open views.

Best,

HR Taghavi,

Owner of 14284 Breezeaway Place

Mailing Address: PO Box 5121, Garden Grove, CA 92846

Phone 562-315-8004

A discussion of our concerns

[Open/green space issues](#)

This project leads to a net loss of green space. We need MORE green space, not less! At a time the city is putting more focus on addressing the need for more open and green space it's odd that this project is being so tone-deaf.

[Destruction of Community Character](#)

The characteristics of this project are completely incompatible with the long standing characteristic of this neighborhood. It is a high density project while the rest of neighborhood is much lower density with mostly single family residences. The city, the streets, the corridors are NOT designed for this.

Response to Comment Letter I228

228 HR Taghavi  
 February 7, 2021

**I228-1** Comment noted.

**I228-2** Refer to **Response to Comment 02-11a** regarding parks and open space. Impacts to neighborhood character are addressed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding aesthetics impacts and private views.

Traffic impacts are addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding traffic and congestion.

Health and safety issues are addressed in Section 5.8, Health and Safety, of the Draft EIR. Health and safety impacts were determined to be less than significant. Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

**I228-3** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property value and quality of life are not physical changes to the environment.

**I228-4** Comment noted.



Safety issues

Our area is in a high fire security zone. This project’s land has been subject to repeated fires. With high profile buildings added through this project while reducing the green space this is only adding to the fire problem. Furthermore, the additional density of this project there will come added traffic issues which will lead to slowdowns of evacuation or access by fire and police departments.

Loss of View:

This problem particularly upsets us. When we bought this property it was due to its location and we paid and added premium for our view. This project will completely destroy that. How can we like this idea?

Loss of Property Values:

This project’s character clashes with the neighborhoods. It has negative impacts on all aspects, safety, view, density, traffic, clash of cultures of low density residents vs high density, high turn-over residents. As such, it will drive down property values.

Environmental Impacts

This project will add to the carbon footprint, will reduce air quality, will reduce green space, and have a net negative impact.

I228-7

**I228-5**

Refer to **Response to Comment 02-11a** regarding open space.

I228-8

**I228-6**

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**.

I228-9

**I228-7**

Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5. I228-8** Refer to **Master Response 2** regarding private views.

I228-10

**I228-9**

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment.

**I228-10**

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**. Refer to **Response to Comment 02-11a** regarding open space. The comment addresses a subject area, which received analysis in the Draft EIR.

Comment Letter I229

**From:** Roberto Zicari <rzicari@gmail.com>  
**Sent:** Saturday, February 6, 2021 12:03 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] (Carmel Mountain Ranch) Trails at Carmel Mountain Ranch / Project No. 652519

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

We would like to add our comments to the proposed project number 652519. As Carmel Mountain Ranch Homeowners and Residents, we have serious concerns about the proposed 1200 unit development. We are concerned about the traffic congestion that this will add due to the existing limited road infrastructure, which was not built to sustain the additional daily commuters. While we agree that there is a need to make use of the vacated land from the defunct golf course, we believe that 1200 units proposed to be built on land in the middle of an existing master planned neighborhood, with infrastructure not built to handle it, will be detrimental to the environment and quality of life of for all residents including the new residents. As concerned citizens, we would like to see a more reasonable and lower number of housing units built which the current infrastructure can handle.

Thank you,

Howard Holtzman  
 Roberto Zicari  
 14106 Brent Wilsey Place #3  
 San Diego, CA 92128

I229-1

I229-2

**Response to Comment Letter I229**  
**229 Howard Holtzman and Roberto Zicari**  
**February 6, 2021**

**I229-1** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I229-2** Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to public utilities were determined to be less than significant with mitigation incorporated.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment. The comment addresses a subject area, which received analysis in the Draft EIR.

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Comment Letter I230

From: Germaine Gerlach <germaineg001@gmail.com>  
Sent: Sunday, February 7, 2021 9:48 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern:

The purpose of this email is to voice my concern regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. I have read thru a large amount of information regarding the proposal, and the following issues are most important to me:

1. The Poway Unified School District has long been one of the best school districts in Southern California, and was the reason my daughter's family chose to move here 25 years ago. My three grandsons have benefitted from this wonderful school district. Now that I am a resident of Carmel Mountain Ranch, I am concerned with the 1,200 units New Urban West is proposing to build and if it is approved, how will our school district be able to maintain its standard of excellence with the accompanying significant increase in student population?
2. My daughter's family lived here and personally knew four families who have lost their homes to the 2003 Cedar fire or the 2007 Witch Creek fire. Thankfully, there was minimal loss of life. Now that I live here, how can we ensure our community's families will be able to safely evacuate the next wildfire with the addition of 1,200 housing units in our immediate backyards?

Sincerely,

Germaine Gerlach

CMR Resident

11835 Wilmington Rd. San Diego, CA 92128

Response to Comment Letter I230  
230 Germaine Gerlach  
February 7, 2021

- I230-1
- The City acknowledges the comment as an introduction to comments that follow.
- I230-2
- Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I230-3
- Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

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Comment Letter I231

From: George Katsanis <georgekatsanis@gmail.com>  
 Sent: Monday, February 8, 2021 11:36 PM  
 To: DSD EAS <DSEAS@sandiego.gov>  
 Cc: Troy Daum <Troy@wealthanalytics.com>; Michelle DeWindt <michelledewindt@gmail.com>  
 Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To: San Diego Development Services Department

From: George Katsanis and Michelle DeWindt  
 13725 Sorbonne Ct.  
 San Diego, CA 92128  
 805-441-1297

Dear Development Services Department,

I am writing to express my strong opposition to the proposed New Urban West development of the Carmel Mountain Ranch (CMR) golf course and Open Space. The proposed development is a uniquely terrible project – it will destroy existing Open Space, proliferate housing sprawl, and add 1,200 housing units with VMT/Capita at 32-43% above the VMT significance threshold.

A stated goal of the original CMR Community Plan was the “retention of open space acreage for view easements, noise buffers, or preservation of natural, irreplaceable environments” (page 33). As noted in the CMR Community Plan (page 35), the golf course was strategically laid out to reinforce ecological preservation and to minimize the impact of urbanization on local ecology. Furthermore, the city’s own General Plan designates the golf course as a “Park, Open Space, and Open Space, and Recreation” area. The golf course represents 175.5 acres of CMR’s total 347.2 acres of Open Space (51%). That is correct, the majority of CMR’s existing Open Space consists of the golf course – and this irreplaceable Open Space is under direct threat of destruction. This is in violation of Senate Bill 375 which requires that California preserve open space and not destroy them with development.

While the proposed project does reserve some land as Open Space it leaves it reduced and fragmented - it will be only a shadow of its former self. Additionally, the constructs for ecological preservation and amenities to make the land accessible for the public’s enjoyment are conceptual at best and noncommittal. What assurances do we have that the residual Open Spaces will be preserved in perpetuity? Clearly, the site’s designation as Open Space in the CMR Community Plan and the City’s General Plan, as well as AR 1-1 zoning, have not been sufficient to protect the land from high density housing development. Perhaps it will need to be dedicated as a wildlife refuge.

Additionally, the proposed project will worsen Climate Change – the biggest challenge of our times – by adding housing with VMT/Capita that is 32-43% above the VMT significance threshold. Appendix G of the EIR notes that impact to VMT are significant and unavoidable. Section-5.2.3 of the EIR states, “the project is in an area where VMT/Capita is between 100 and 125 percent of the regional average. Therefore, the project is not located in a VMT efficient area”.

As a city, we can and must do better. Robbing the CMR community of vital Open Space while increasing regional VMT/Capita is not the right choice.

I231-1

**Response to Comment Letter I231**  
**231 George Katsanis and Michelle DeWindt**  
**February 8, 2021**

Refer to **Response to Comment 02-11a** regarding open space. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I231-2

Refer to **Master Response 1** regarding consistency with the City’s General Plan and the Community Plan, as well as Tables 5.1-2 and 5.1-3 of the Draft EIR. Moreover, the project would not convert the entire former golf course into development, rather, as stated in Section 3.0, Project Description, of the Draft EIR, the project would include approximately 111 acres remaining as parkland, open space, and buffer areas. Also refer to **Response to Comment 01-11** regarding SB 375 consistency.

I231-3

Refer to **Response to Comment 02-11a** regarding open space. Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project’s impacts on biological resources were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

- I231-4** Refer to **Response to Comment 02-11a** regarding open space. The long-term maintenance and preservation of open space resources on the project site including the trail system would be the responsibility of a new Master HOA. The HOA would also be required to contract with qualified professionals for the long-term care and maintenance of the bioretention basins and brush management zones. The HOA would also be responsible for enforcement of the project's Covenants, Conditions, and Restrictions. Any potential changes in use would be subject to future environmental review and the discretionary process. Additionally, the project will record public recreation easements over the entire trail network. Refer to **Master Response 10** regarding alternatives. The comment addresses a subject area, which received analysis in the Draft EIR.
- I231-5** Greenhouse gas emissions were addressed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**. Refer to **Master Response 3** regarding transportation/circulation impacts. Refer to **Response to Comment 02-11a** regarding open space. The comment addresses subject areas, which received analysis in the Draft EIR.

The following are some additional personnel reflections, I share them with the intention of adding some color to how I fear the proposed development will impact my community...

My wife and I have been Carmel Mountain Ranch homeowners since 2015, and have two children who both attend Shoal Creek Elementary school. We both work full time, are active in the community, and are proud to call San Diego home.

My wife and I both grew up in San Diego but met when we attended Cal Poly in San Luis Obispo. After college we lived in Los Angeles for six years. During those six years, our constant aspiration was to return to San Diego, not only because we have family here but also because of the quality of life that America's Finest City offers – especially when compared to the overdeveloped, crowded, and congested Los Angeles. We often joked about our “get out of Los Angeles plan”.

We call Los Angeles the “one thing a day city”. Want to go to the beach, go on a Costco run, or how about visit friends – you can do any of those but will have to pick only one, because it will literally take all day. The congestion is unbelievable – I’m talking total gridlock at 9 am on a Sunday morning.

One day, while still living in Los Angeles, we were back in San Diego visiting family. While enjoying some sandwiches at a Subway we saw a van pull up. A whole little team hoped out, all in their uniforms, and were stopping to get ice cream. It struck us that you would never see that kind of thing in Los Angeles (even in the nice parts) – it’s just too crowded and difficult to move around to enjoy yourself.

We doubled our resolve to move back to San Diego. Soon we got jobs in San Diego, moved to Carmel Mountain Ranch, and have been happily raising our family here ever since. We desperately don’t want to see San Diego become another Los Angeles. The goal of city leaders should be to maximize resident’s quality of life – not to compete with other cities for the biggest population and largest tax revenue.

If the pandemic has taught us nothing else it has taught us that people need space, space to spread out, and to get outside. COVID spread early on like a wildfire in the most densely populated urban areas; we are not meant to live like that – crammed into a megalopolis. Now people are flocking to the countryside seeking the space they need to live, thrive, and stay healthy. These changes will be long lasting, trends towards telecommuting are shifting where people chose to live and should be considered when community planning. Yesterday’s priorities, like proximity to public transportation, are becoming less important as people stay closer to home.

My view is not NIMBYism, when the Carlsbad Strawberry Field shopping mall (30 miles from my home) was on the ballot a few years ago I opposed that as well – and for the same reasons, and was relieved that it was voted down. That, just like New Urban West, was another Los Angeles area developer (Rick Caruso) looking to pave over our open space. Developing open space is the worst kind of development – once you lose the open space you never get it back.

There’s all the other stuff I’m sure your hearing from other residents too – the proposed development is not in the character of the existing CMR master plan, there is inadequate parking, buffer zones are too small, there will be environmental impacts, there are significant Native American sights on the land, road/school/fire infrastructure is inadequate for the growth, etc... All very true, but the thing I’m focused on is maintaining our Open Space – which was and is a vital cornerstone of the CMR master plan, so that we can all have it as a community resource to enjoy and spread out a bit.

NUW gives lip service to maintaining open space in their slick marketing but the parking lots, drainage embankments, and a handful of tiny pocket parks are thin consolation to the loss of the large open space our community is built around. Make no mistake; this is about developing mostly unaffordable housing to enrich the seller and developer.

Before you vote – have listen to Big Yellow Taxi by County Crows...

“You don’t know what you’ve got til its gone  
They paved paradise  
And put up a parking lot”

2

I231-6

Comment noted.

I231-7

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Response to Comment I231-2** above for information on land use consistency.

Tribal cultural resources were addressed in Section 5.15, Tribal Cultural Resources, of the Draft EIR. Impacts to tribal cultural resources were determined to be less than significant with mitigation incorporated.

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information and regarding parking. Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant utility infrastructure impacts with mitigation incorporated.

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Fire services were addressed in Section 5.14, Public Services and Facilities. Impacts to fire services and facilities were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

I231-6

I231-7

I231-8

I231-9



There is a smarter way to do community development. My wife and I recently took the kids on a weekend getaway to San Luis Obispo, to visit our alma mater. Sure the city has grown, but it has not lost its character. There is still an abundance of open space, new development has been thoughtfully integrated, and some previously developed areas have been rebuilt to accommodate growth.

Please, let's follow the San Luis Obispo model of city development and not the Los Angeles model.

Keep CMR Beautiful and protect San Diego from overdevelopment!

Thank you,  
George Katsanis and Michelle DeWindt

I231-9  
Cont.

- I231-8 Refer to **Response to Comment 02-11a** regarding open space.
- I231-9 Comment noted.

Comment Letter I232

From: George Asaad <georgeasaad@gmail.com>  
Sent: Friday, February 5, 2021 10:55 AM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To Whom it May Concern,

My name is George Asaad. I live at 11969 Tivoli Park Row, Unit 8. I am writing to express my concerns over the new developments at Carmel Mountain Ranch. We are especially concerned that the proposed housing is not compatible with existing housing in the area. Your project objectives will not be met with this plan. Without the addition of any single-family homes, the project will develop a dense housing strategy in the area, which will not fit with our community. Without comprehensive analysis or estimates, we are left to believe that there will be a negative impact on schooling, transportation and mobility of existing communities. Such a drastic population increase could truly be detrimental to the resources and safety of our community. We are deeply concerned about these changes.

I232-1  
I232-2  
I232-3  
I232-4

*If you have any questions please do not hesitate to call or e-mail me.*

Sincerely,  
  
*George Asaad*  
A Berkshire Hathaway HomeServices Affiliate  
16969 Bernardo center Dr.  
San Diego, CA 92128  
Ofc : 858-385-8443  
Fax : 858-451-0932  
Cell : 619-218-4922  
Email: [georgeasaad@gmail.com](mailto:georgeasaad@gmail.com)  
DRE # 01270354

Response to Comment Letter I232  
232 George Asaad  
February 5, 2021

- I232-1** The City acknowledges the comment and notes it serves as an introduction to comments which follow.
- I232-2** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. Refer to **Master Response 2**.
- I232-3** Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I232-4** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element.

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Comment Letter I233

From: Mariafe Salamat <fesalamat@hotmail.com>  
Sent: Saturday, February 6, 2021 1:53 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Comments

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Project Name: The Trails at Carmel Mountain Ranch  
Project Number: 652519/SCH No  
2020039006

As among the first Carmel Mountain Ranch homeowners for almost 3 decades, we're really concerned of the proposals for the new housing development. With the proposed 1,200 units development approximately 60% rental units is much of our concern. 60% rental units is a big number and will create more density, congestion, lack of parking spaces, more public. Can the proposed number of units and % of rental units be lowered?

Carmel Mountain Ranch Community is a perfect place for us being at the last journey of our lives a retired/senior citizens. CMR is our HOME and if ever the proposed plan happens, the project should retain the character of what Carmel Mountain Ranch Community is.

Sincerely,  
Florentino and Mariafe Salamat

Response to Comment Letter I233  
233 Florentino and Mariafe Salamt  
February 6, 2021

- I233-1
- Refer to **Master Response 1** regarding density. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation, congestion, and parking. The comment addresses subject areas, which received analysis in the Draft EIR.
- I233-2
- The City acknowledges the comment and notes it pertains to community character. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

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Comment Letter I234

From: Eric Schleicher <ericschleicherpt@gmail.com>  
Sent: Monday, February 8, 2021 11:06 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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I am writing in strong opposition to New Urban West's planned development. This type of housing, and the density, will create additional traffic on our already congested streets, parking problems and safety issues for our community. We are committed to pursuing all legal opposition to this project for as long as necessary.

Eric Schleicher  
11109 Provencal Place  
San Diego, CA 92128

I234-1

Response to Comment Letter I234

234 Eric Schleicher

February 8, 2021

I234-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** transportation/circulation and parking. Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I235

**From:** Trish Lindgren <tlindgren22@yahoo.com>  
**Sent:** Monday, February 8, 2021 11:31 PM  
**To:** DSD EAS <DSEAS@sandiego.gov>  
**Subject:** [EXTERNAL] EIR Input—Trails at Carmel Mountain Ranch Project #652519/SCH #2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Environmental Planning Staff,

I am writing to provide input regarding the Environmental Impact Report (EIR) for the following project:  
 Project Name: Trails at Carmel Mountain Ranch  
 Project No. 652519 / SCH No. 2020039006  
 Community Plan Area: Carmel Mountain Ranch  
 Council District: 5

Issues include:  
 5.2 Transportation  
 5.3 Air Quality and Odor  
 5.11 Noise  
 5.17 Visual Effects/Neighborhood Character

The proposed project, if approved, will result in a multitude of significant environmental impacts. I request that you choose the "No Project/No Development" alternative. As an original owner in the Carmel Mountain Ranch development, I am disappointed that the city is considering the approval of any major change to the planned community of Carmel Mountain Ranch. I would suspect that you are only hearing the concerns from a very small portion of the community, but most of the residents are vehemently opposed to developing any part of the golf course because it was the central reason for buying into this community in the first place.

The community received its nickname "Crowded Mountain Ranch" because of the congestion felt on the streets and in the shopping centers. After the years of negotiations between developers and the city planners who agreed to the ultimate ratios of residential, commercial and open space, additional high-density housing was built. Now, as any CMR resident can attest, the area is crowded with traffic, and we all have often had difficulty finding parking. To make matters worse, someone wants to develop high-density housing to replace the parking garage on Carmel Ridge Road, just north of Ted Williams Parkway. If that project proceeds, it will bring additional people and vehicles to the community, further impacting the area's retail establishments and parking lots. The recently approved and constructed Pacific Village is an eyesore and is likely to add significant traffic to the Carmel Mountain Ranch development once residents have fewer restrictions and recommendations to stay at home. Adding more housing and residents to the community will decrease the desirability to live in this community.

The multi-family apartment complex proposed for Unit/Hole 16 is in close proximity to Highland Ranch Elementary School, the ESS facility, and Highland Ranch Park. The traffic that will be added due to this and the apartments proposed for Unit/Hole 17 will further compound the congestion that is already problematic. Twice each school day, it is nearly impossible to enter or leave the neighborhood for up to an hour at a spell. Simultaneously, parents dropping off or picking up their children park everywhere they can, sometimes blocking driveways and making it impossible to even drive off one's own driveway. There already are times when emergency vehicles are slowed or restricted when called to help people in the existing developments. We are not assured that the area can be evacuated in a safe and timely manner if threatened by wildfire or an explosion. The potential for lawsuits on these points are a serious concern.

Carmel Mountain Ranch was a thoroughly thought-out planned community, which is the reason that people have gravitated here and it has been as popular as it has been. The city planners at the time were instrumental in setting a reasonable ratio of residential, commercial and open space. If this project is approved, the city is reneging on its earlier agreements and disrupting what the planners worked hard to create. It makes no sense. Please contemplate all of the health and safety issues, as well as the visual effects, of the proposed project more closely. This project fails to satisfy the requirements the city planners demanded when this community was designed. There have been too many exceptions allowed that have altered the original community plan significantly.

Thank you for reviewing and considering my input. Please choose the "No Project/No Development" alternative for this proposal.

Sincerely,  
 Patricia Lindgren  
 CMR Homeowner and Resident

Response to Comment Letter I235

235 Patricia Lindgren

February 8, 2021

I235-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Air quality was addressed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.

I235-2

Comment noted.

I235-3

Refer to **Response to Comment I235-1** regarding traffic. Cumulative impacts were analyzed in Section 6.2, Cumulative Impacts, of the Draft EIR and both the Pacific Village and Alante projects, as mentioned by the commenter, were included in the cumulative analysis.



Refer to **Master Response 3** regarding parking. The comment addresses subject areas, which received analysis in the Draft EIR.

**I235-4** Refer to **Response to Comment I235-1** regarding traffic.

**I235-5** Emergency access was addressed in Section 5.2, Transportation/Circulation, and Section 5.17, Wildfire, of the Draft EIR. The proposed project would provide adequate emergency access to the project site and would comply with applicable state and City standards associated with fire hazards and prevention. Impacts related to emergency access were determined to be less than significant.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I235-6** Refer to **Response to Comment I235-1** regarding community character.

**I235-7** Comment noted.

Comment Letter I236

**From:** Eliana Safar <elianasafar@yahoo.com>  
**Sent:** Monday, February 8, 2021 5:33 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Thanks for taking the time to read this.

I took a quick look at the CMR EIR and have many concerns. Here are some of the concerns I have just to list a few.

Will miss all the wildlife that moved in in the last 2 years, quail, road runners, pelicans, coyotes, red hawks, bobcats, and many kinds of birds.

Back in 2007 during the October fires we were unable to evacuate. With more residents in the area, evacuation plans are not addressed enough in the EIR.

The majority of existing houses are two store homes while the new project does not list any 2-store houses. The new buildings 3-4 multi store buildings that don't fit in the character of CMR.

The distance between existing houses and new buildings is not adequate. Privacy and noise are big concerns to us.

Regards,

Eliana Safar

[14059 Via Corsini, San Diego, CA 92128](mailto:14059.Via.Corsini.San.Diego.CA.92128)

I I I I I  
I236-1 I236-2 I236-3 I236-4 I236-5

Response to Comment Letter I236

236 Eliana Safar

February 9, 2021

- I236-1** The City acknowledges the comment as an introduction to comments that follow.
- I236-2** Impacts to biological resources are assessed in Section 5.4, Biological Resources, of the Draft EIR, in which impacts to special status wildlife species were analyzed and determined to be less than significant with mitigation incorporated.
- I236-3** Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I236-4** Impacts to visual quality and character are assessed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.
- I236-5** Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Noise impacts were addressed within Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

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Comment Letter I237

**From:** Eduardo Lopez <alopez@san.rr.com>  
**Sent:** Monday, February 8, 2021 11:30 AM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** webmaster@waltersmanagement.com <webmaster@waltersmanagement.com>  
**Subject:** [EXTERNAL] Project name -The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Sir or Madam,  
I am writing in opposition to this project.  
Reading the Environmental Impact Report for Project 652519 draft report dated 12/23/20, I can see that report finds this project will have significant negative impact in the community. The report recommends alternatives that may have less impact but even with the modifications the impact to noise, population will still be significant.  
Therefore, the No project seems to be the best alternative.  
These are some of my concerns:

- The proposed development will encroach on a well established community and destroy its character and nature. Although the goal of providing affordable housing is a great one, the project offers 10% of units as affordable housing. This looks mor like a political goal. In any case, the project doesn't offer even 50% chance of ownership. So, who will benefit from this project? Not the community but investors.
- The alternative low density project attempts to mitigate various problems. However, it calls "for numerous building types" to be built in current residents backyards. The project takes into consideration current regulations but it also calls for "allowable deviations" and gives non-specific concessions to the developer, i.e., building height, lot size, backyard setbacks, etc.
- Despite mitigation measures the noise, population and housing aspects were found to be significantly impacted: "Transportation/traffic, circulation, public services (libraries), and population and housing would remain significant and unavoidable". Even, more the cumulative impact will be worse.
  - This specific item doesn't address impact on other services such police, schools, recreation
- The draft states the City Council would need to determine whether and how to mitigate the impact on transportation/Circulation, public services, population and housing.
  - The City Council would need to override these concerns as there are no feasible solutions to these issues:
    - Street parking (already a significant problem)
    - Public services
    - Traffic
- The alternative proposal, low density, may reduce severity of the impact but would still remain significant and unavoidable.
  - The reduced footprint option would require another deviation from the height limits. The project asks for a deviation to 48 feet, the proposed reduced alternative requests a deviation to 68 feet height to accommodate 4-6 stories buildings. Many more balconies looking into other people's backyards.

I237-1

I237-2

I237-3

I237-4

I237-5

I237-6

I237-7

I237-8

Response to Comment Letter I237

237 Eduardo Lopez-Gibson

February 7, 2021

I237-1

Impacts to noise were analyzed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.

I237-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I237-3

Comment noted.

I237-4

Refer to **Master Response 10** regarding alternatives.

I237-5

Comment noted.

I237-6

Public services and facilities were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police, schools, and recreation facilities were

In summary,

- The golf course is already surrounded by homes that have been there for a long time and whose occupants will lose their privacy.
- There is no mention in the report on the impact on fire department, police, schools, postal service, grocery stores.
- The report doesn't address parkin problems that will only get worse.
- This is not a single project but multiple project scattered through a well-established community.

Respectfully,

Eduardo Lopez-Gibson  
3664 Berryfield Ct.  
San Diego, CA 92130  
(858) 259-0063

I 1237-9  
I 1237-10  
I 1237-11  
I 1237-12

determined to be less than significant. Refer to **Master Response 6** regarding schools. The comment addresses subject areas, which received analysis in the Draft EIR.

**I237-7** Refer to **Response to Comment I237-6** regarding public services and facilities. Public services and facilities impacts were determined to be significant and unavoidable due to the impact on library services. Impacts to all other public services and facilities were determined to be less than significant.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. The comment addresses subject areas, which received analysis in the Draft EIR.

**I237-8** Refer to **Master Response 10** regarding alternatives.

**I237-9** Comment noted.

**I237-10** Relative to police and school services, refer to **Response to Comment I237-6**. The same less than significant conclusion applies to fire services. With regard to postal service or grocery stores, pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Impacts to postal service and grocery stores are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

**I237-11** Refer to **Master Response 3** regarding parking.

**I237-12** Comment noted.

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Comment Letter I238

From: E Li <eli92121@yahoo.com>  
Sent: Monday, February 8, 2021 3:43 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Cc: E Li <eli92121@yahoo.com>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern,

My name is E Lisa Li, and I am a resident at Carmel Mountain Ranch. I have deep concerns about the New Urban West's planned 1,200 units development. I've lived in CMR for more than twenty years. I love our community and its uniqueness of peaceful, open space, and its recreation areas. I live on the down hill side of the golf course. Thinking about 3 or 4 story buildings above my backyard is very depressing. I have a lot of concerns for the new development. Below is a summary of my main concerns.

- VMT analysis does not properly reflect increased greenhouse gas emissions. These results are dramatically contrary to the City's Climate Action Plan goal of reducing greenhouse gas emissions. I really worry about the public health impact on our small community.
- The development will significantly increase traffic on our already congested streets, causing more parking problems on the street. It will impact on the planned public walking trails.
- Filling prime open space parcels with 3 and 4 story buildings will forever remove the feel of peacefulness that open green spaces bring.
- The blighted look of the golf course was created by current ownership. Permanent irrigation system will be needed to keep all common and buffer areas alive and growing. Golf Course Blight Should be Remedied by Current Owners by increasing mowing and brush maintenance.
- project is creating a net reduction in Parks and Open Space for CMR. We need more parks and recreation areas due to uniqueness and amount of open space in CMR. These spaces should be developed recreationally such as additional playgrounds, playgrounds, passive park space, frisbee golf or skatepark.
- Trails as proposed will not meet proposed uses and will create other problems. Width of Trails is too narrow, not ADA compliant and create existing homeowner's safety, security, noise and privacy issues. Multi-use trails need to be a minimum of 50' from existing homeowner fences.
- 100-foot buffers for sensitive areas are needed on all project Pperimeters. The 100' buffers with the trails are needed to provide for the health, safety, security, noise and privacy issues created by a 100% publicly accessed trail.

I238-1

I238-2

I238-3

I238-4

I238-5

I238-6

I238-7

I238-8

Response to Comment Letter I238

238 E. Lisa Li  
February 7, 2021

I238-1

The City acknowledges the comment and notes it expresses general project opposition and serves as an introduction to comments which follow.

I238-2

Regarding greenhouse gas impacts and consistency with the City's Climate Action Plan, refer to Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. As explained therein, the project would be consistent with the City's Climate Action Plan and greenhouse gas emissions were determined to be less than significant. Refer to **Master Response 8**.

I238-3

Traffic impacts are analyzed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking.

I238-4

Refer to **Response to Comment 02-11a** regarding open space. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.

I238-5

Impacts to water (i.e., irrigation) are analyzed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR concluded the project would result in



Please feel free to reach me via phone at 858-231-5988 or email at [eli92121@yahoo.com](mailto:eli92121@yahoo.com). Thank you for your considering my concerns and getting them addressed.

Sincerely,

E Lisa Li

14163 Capewood Lane,

San Diego, CA 92128

Phone: 858-231-5988

Email: [eli92121@yahoo.com](mailto:eli92121@yahoo.com)

I 1238-9

a less than significant impact related to water supply. Additionally, the project would establish an independent HOA, separate from any existing HOAs. The long-term maintenance and preservation of open space resources on the project site including the trail system would be the responsibility of a new Master HOA. The HOA would also be required to contract with qualified professionals for the long-term care and maintenance of the bioretention basins and brush management zones.

**I238-6** Refer to **Response to Comment 02-11a** regarding parks and open space.

**I238-7** Refer to **Response to Comment 02-7** regarding public safety. Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment 02-13a** regarding buffers.

**I238-8** Refer to **Response to Comments I238-7**.

**I238-9** Comment noted.

Comment Letter I239

From: espedale <erikspedale@gmail.com>  
Sent: Monday, February 8, 2021 5:07 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Cc: Troy Daum <troy@wealthanalytics.com>  
Subject: [EXTERNAL] Re: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Re: *The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006*

Dear San Diego City Planning Commission,

I am writing to encourage you to reject the project proposed by New Urban West, a Los Angeles-based developer. I have read the flawed EIR report submitted to you by New Urban West and take issue with its conclusion that this project would not pose a significant impact to the environment in the community of Carmel Mountain Ranch.

Of course, it is common sense to understand that increasing housing density an additional 25% in an already densely populated area will have a huge negative impact on traffic, water use, classroom size, emergency services, and quality of life. My objection will focus on how the increased traffic will directly impact the life of my family in a very unsafe way.

New Urban West would have you believe that traffic flow from each individual project location will be distributed to the surrounding main roads with multiple lanes. This is simply not the reality. Please reference the included map for visual clarification of my argument.

The red patches represent the regions of "The Trails" development relevant to my specific objection. The yellow lines represent the traffic flow New Urban West would have you believe is the common route residents of the new development properties would take to get to the major shopping centers (Ralphs, Trader Joe's, Costco, etc.). They would like you to assume residents would take the two and three lane roads including: Ted Williams, Rancho Carmel Drive, and Highland Ranch Rd. (indicated with yellow lines). Indeed, these multi-lane roads were designed for high traffic.

As you will see, this assumption is flawed and dangerous.

Residential traffic from "The Trails" would instead flow through our already high-traffic residential streets. Most affected would be the streets of Windcrest Ln. and Seabridge Ln (indicated with red lines and arrows). Why is this the case? Taking a look at the yellow lines on the map, you can see that the main roads are not only a longer route from the main shopping centers, but these routes also have multiple traffic lights with long wait times. Existing residents in Carmel Mountain Ranch have figured out that using Windcrest Ln and Seabridge Ln provides a "shortcut" (shortest distance, no traffic lights) to get to the main shopping centers. Many residents drive through our residential streets at unsafe speeds. During high traffic times (in the AM to work, PM from work, and weekends), it is already a heart-pounding experience for residents of both Windcrest and Seabridge trying to back out into relentless speeding traffic from their driveways. The proposed project would compound that risk to a very dangerous level.

This is exactly the type of project the City Planning Commission is mandated to protect the citizens of San Diego from. It will make our residential streets congested and unsafe, especially for children and the elderly. Please recommend the San Diego City Council VOTE NO on project approval of "The Trails at Carmel Mountain Ranch" as currently proposed. Rather, there needs to be a lower density plan that fully addresses the traffic capacity our residential streets were designed to accommodate.

Thank you for your consideration.

Erik Spedale

14462 Seabridge Ln  
San Diego, CA 92128  
(858) 395-5417

Response to Comment Letter I239

239 Eric Spedale  
February 8, 2021

I239-1

Comment noted. To clarify, the City prepared the Draft EIR.

I239-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Level of service and congestion or capacity-based measures of effectiveness are not considered as impact criteria for CEQA purposes. Therefore, they are not considered in the transportation/circulation impact analysis and no CEQA mitigation is required associated with project traffic being added to Windcrest Lane and Seabridge Lane. The Local Mobility Analysis performed for the project did evaluate the addition of project traffic to Windcrest Lane and Seabridge Lane and found that both roadways have adequate capacity to accommodate the project traffic under opening year and 2050 conditions.

Water use is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to water services and facilities were determined to be less than significant. Emergency services and facilities were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to emergency services and facilities were determined to be less than significant.



I239-5

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

**I239-3** Regarding cut-through traffic, Section 5 of the Local Mobility Analysis (Draft EIR Appendix C) describes the procedures used in assigning project traffic to the network. Existing cut-through traffic and its effect on roadway network operations is accounted for in the Local Mobility Analysis. Improvements to alleviate project effects to traffic operations were identified per the City of San Diego's Local Mobility Analysis guidelines. Refer to **Response to Comment I239-2** and **Master Response 3** for additional information regarding transportation/circulation impacts.

**I239-4** Comment noted.

**I239-5** Refer to **Response to Comment I239-3**.

Comment Letter I240

Response to Comment Letter I240  
240 Eric and Deva Edelman  
February 7, 2021

February 8, 2021  
E. Shearer-Nguyen, Environmental Planner,  
City of San Diego Development Services Center,  
1222 1st Avenue, MS 501,  
San Diego, CA 92101  
Via e-mail to DSDEAS@sandiego.gov  
Re: Project No. 6526519, SCH No. 2020039006

From: Eric & Deva Edelman  
14015 Royal Melbourne Sq  
San Diego, CA 92128

Dear Ms. Shearer-Nguyen and City Council:

We are currently residents/homeowners in CMR. We have lived in CMR for the past 17 years. We have reviewed the draft EIR for this project in detail and have serious concerns about the project as it is currently proposed.

This letter will touch on the following subjects:

- Increased Wildfire & Fire Evacuation Risk
- Detrimental Impact to Community Character
- Lack of Viable Mass Transit
- Lack of Consideration Given to Project Alternatives

Wildfire

The EIR shows that quite a bit of this proposed project lies within a Very High Fire Hazard Severity Zone (per the state map on grid tiles 35, 36, and 40 on City of San Diego Fire Map, 2009). Even though not all of the project lies within this zone. The history of wildfires in California, and San Diego in particular, teaches us that the fire is not going to simply stop at the edge of this mapped boundary. Wildfire risks to adjacent zones need to be considered along with the Very High Fire Hazard zone.

Sprinkler systems and brush clearing will mitigate some of the fire risk; however, wind-driven Santa Ana fire conditions are unpredictable and have shown us in the past that in a serious Santa Ana fire event, no amount of mitigation will stop a storm like this from consuming everything in its path.

- I240-1 The comment serves as an introduction to comments which follow.
- I240-2 Wildfire is discussed in Section 5.19, Wildfire, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**.

I240-1

I240-2

I worked at MCAS Miramar during the 2003 wildfires. I was there when 15,000 acres of east Miramar was consumed by fire in less than 30 minutes. It is clear from past experience that these fires are not something agencies can always plan for. When the wind is blowing and the fire gets started in the wrong place at the wrong time, everything will burn.

We lived in CMR during the 2007 wildfires and were asked to evacuate. At that time we had an infant son. When we tried to evacuate as instructed we got stuck in traffic and were forced to turn back and stay at home. Fortunately that fire didn't reach CMR. We may not be as lucky next time. One thing we are sure of, is that there will be a next time.

This EIR does not specifically address the potential for gridlock during a mass evacuation event. The EIR designates SR56 and I-15 as evacuation routes; although, it does not address how the impact of several thousand new residents to the area will impact these evacuation routes. Also, this project does not exist in a vacuum. Other recent development across I-15 in Rancho Penasquitos will further impact these routes.

#### Detrimental Impact to Community Character

The proposed development should align with the planned and current character of CMR. The plan, as proposed, contains 0% low-density housing. According to our community plan CMR is composed of 11% low-density residential, 64% low-medium density residential, and 25% medium-density residential. This plan contains 73% low-medium density residential, and 27% medium-density residential.

Along with the incongruity with the community plan as it relates to housing density, this project, as proposed, will drastically alter the percentage of for-rent vs. owned housing units. Roughly 1000 new for-rent units in CMR will forever alter the character of this community. Making 10% of those rental units "affordable" will mean that there will be approximately 100 "affordable" units.

The need for affordable housing is crucial to the continued growth and success of CMR and San Diego in-general; however, if all the "affordable" housing is only for-rent dwellings, this will not help those seeking to put down roots here gain an equity stake in the community.

The EIR does not adequately address or propose adequate mitigation for the permanent alteration to the character of this community.

#### Lack of Viable Mass Transit

This project is given special treatment on certain items due to the fact that two of the proposed development units lie w/in a TPA. This TPA, while it may be less than a half a mile from units 5 and 6 is not walkable.

I240-3

I240-4

I240-5

I240-6

I240-7

I240-8

I240-9

**I240-3**

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I240-4**

Refer to **Response to Comment I240-3** regarding evacuation.

**I240-5**

Cumulative impacts were analyzed in Section 6, Cumulative Impacts, of the Draft EIR. All other cumulative projects would be subject to the same requirements as the proposed project with respect to FMZs and compliance with all applicable building and fire code requirements, which have been demonstrated to slow the spread of wildfire in previous fire events. Lastly, not all the projects listed in Table 6-1 are within Very High FHSZ areas (in fact, only The Junipers is within a Very High FHSZ), nor would they all be evacuated at the same time. Rather, each fire event is managed by an Incident Command (IC) who would make decisions in real time to determine which, if any, neighborhoods, and communities were safe to evacuate. Such factors that would be considered include any traffic/gridlock, weather and wind patterns and the likely path of travel for the fire, presence of defensible space to defend structures and neighborhoods, and other considerations. Refer to **Master Response 5** for additional information regarding wildfire hazards and evacuation.

**I240-6**

Community character was addressed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

- I240-7** Refer to **Response to Comment I240-6** regarding community character. Additionally, refer to **Master Response 1** regarding the project's consistency with the City's General Plan and Carmel Mountain Ranch Community Plan.
- I240-8** Refer to **Response to Comment I240-6** regarding community character.
- I240-9** As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

Aside from repurposing old golf-cart paths, this project does nothing to address this lack of walkability. CMR's terrain is steep and varied. There is an elevation difference between the highest and lowest point in our community is several hundred feet.

The sidewalks in CMR are generally unprotected from traffic that runs between 45 and 60 MPH in the areas people would be expected to walk. There is no proposed mitigation for this in the EIR. Nor does the EIR address the fact that these new, proposed trails are not ADA compliant.

In addition to the lack of access for residents to the TPA, there are not viable transportation routes available to people once they arrive at the transit center. There is no rail planned for this site and currently only 3 bus routes that travel from this location. Bus routes 235 and 290 go downtown. There are no westbound routes from this TPA site. In order to go west, a rider must go to Mira Mesa and transfer to a different bus. The lack of westbound routes negates the ability for a rider who works where most of the jobs actually are, to get to work in a timely manner.

#### Lack of Consideration Given to Project Alternatives

There is a reduced option proposed in the EIR of 825 units. Since the mitigation of such a project would only be "slight" the EIR goes on to state that this reduced option is not viable.

The CMRSSCC (Carmel Mountain Ranch/Sabre Springs Community Council) has proposed a much smaller project option on several occasions. The CPS's annual report (available on the City's website) states that the CPG is not opposed to development, but opposed to the project as proposed. The CPG's position letter delivered to the SD Planning Department on July 15th 2020, also proposes a project of approximately 250 units.

A project of 250 - 300 units with 15% of those units being for-sale, deed-restricted affordable housing would do more to mitigate the affordability crisis in San Diego, than a project with 100 "affordable" for-rent units.

#### Conclusion

We oppose this project because it will forever alter the character of CMR. It will create increased casualties in the event of a large Santa Ana-driven fire-storm. There are very few viable mass transit options available to residents. The city of San Diego and the developer have thus far ignored any counter proposal from the CMRSSCC.

Thank you,



Eric & Deva Edelman  
14015 Royal Melbourne Sq.

I240-9  
Cont.

I240-10  
I240-11

I240-12

I240-13

I240-14

I240-15

**I240-10** The existing sidewalks are part of the baseline condition, and the proposed project is not required to analyze existing conditions under CEQA. Nevertheless, Section 5.2, Transportation/Circulation, of the Draft EIR does analyze the potential for the project to conflict with an adopted program, plan ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities. The Draft EIR determined that impacts would be less than significant. Additionally, Section 13 of the Local Mobility Analysis (Draft EIR Appendix C) identifies which intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The Local Mobility Analysis lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety. The comment addresses a subject area, which received analysis in the Draft EIR.

**I240-11** Refer to **Master Response 3** for a discussion pertaining to ADA accessibility.

**I240-12** Comment noted.

**I240-13** The Draft EIR concluded that the Reduced Density Alternative, which was identified as the Environmentally Superior Alternative, would not avoid any of the significant and unavoidable impacts of the project; nor would it meet the project objectives to the same extent as the project. Refer to **Master Response 10** regarding the alternatives analysis.

**I240-14** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

**I240-15** Comment noted.



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Comment Letter I241

Response to Comment Letter I241

241 Karen Vogue (2)

February 8, 2021

February 8, 2021

E. Shearer-Nguyen, Environmental Planner  
Development Services Dept  
101 Ash Street  
San Diego, CA 92101

Re: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

Addendum to my letter to you of Feb 3, 2020

Dear Ms. Shearer-Nguyen:

In the last several days, it has come to my attention that there were inadequacies in the Biological Resources Survey and I would like to add these to my letter of February 3rd.

A neighbor mentioned the surveyors did not see Cooper's Hawks on the former golf course, yet he sees them quite often in his backyard that abuts the course. Another neighbor said the same thing, so I asked the community to send me photos of wildlife and was amazed what was sent to me over a three day period. Photos are attached. There are 3 pages of Cooper's Hawks alone plus bobcats, a blue heron, a turkey vulture etc.

People submitted over 20 photos of Cooper's Hawks that were photographed in the last two years, some were taken today. They are a protected species. There were two sightings of yellow warblers, which are listed as a "species of concern". These were not spotted either in the survey.

It seems the survey was inadequate as these and other animals were not observed living on the golf course when in fact they are. The survey period was very short, less than 15 hours total over four days: one full day, a half day, a 2 hour period and a 1 hour period. This is clearly not enough time to get an accurate picture of what is living on the golf course.

It is obvious the former golf course in its current state has become a wildlife habitat. This is in spite of it being a fallowed property. It's not land in its natural state and yet it's supporting a multitude of wildlife. It is supporting protected and special status species. With this new information, I feel this habitat needs to be protected. Removing habitat during non-nesting season is not a satisfactory mitigation. It will be unconscionable to allow the destruction of nests and habitats of so many animals living here, especially when CMR has a large Cooper's Hawk population and other rare animals.

As I pointed out in my first letter, the golf course was designed as an integral part of Carmel Mountain Ranch. The golf course is classified as Open Space both in our Community Plan and the General plan and zoned AR1-1 since its inception.

This proposed development will not only destroy the character of CMR it will destroy wildlife habitat. Because of this new information, I respectfully request the city adhere to the zoning and have the owner of the property sell or use the land under another AR1-1 use.

I241-1  
I241-2  
I241-3  
I241-4  
I241-5  
I241-6  
I241-7

I241-1

The comment provided additional comments to those previously submitted by the commenter. Refer to **Response to Comment Letter I138**.

I241-2

Biological resources, including Cooper's Hawks, are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. The Draft EIR includes mitigation measure **MM-BIO-1 (e) and (f)** to ensure indirect impacts to Cooper's hawk would be reduced to less than significant. Refer to **Response to Comment S2-21**.

I241-3

The Draft EIR, Section 5.4 Biological Resources, identified yellow warbler as an MSCP covered species with a moderate to high potential to occur on-site; thus, the analysis did consider the project's impact on this species. Accordingly, mitigation measure **MM-BIO-1** is recommended to reduce impacts to yellow warbler to below a level of significance.

I241-4

Biological surveys were conducted in accordance with the City's guidelines and were performed after the golf course closed. In addition to survey results, the biological resources analysis also considered what species were likely to occur in the project area; thus, even if certain species were not observed their presence is still assumed. Section 5.4, Biological

Resources, analyzes the proposed project's impacts to biological species, including species protected under both the Federal and State ESAs and the Migratory Bird Act Treaty. Impacts were found to be potentially significant, and mitigation is provided to reduce impacts to less than significant levels.

**I241-5** Refer to **Response to Comment I241-2**.

**I241-6** Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. The comment addresses a subject area, which received analysis in the Draft EIR.

**I241-7** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Regarding wildlife and biological resources, refer to **Response to Comment I241-2** through **I241-4**.

**I241-8** Comment noted.

**I241-9** Comment noted.

Comment Letter I242

Response to Comment Letter I242  
242 John Neighbors  
February 7, 2021

February 8, 2021

E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501, San Diego, CA 92101

Project Name: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

Dear Ms. Shearer-Nguyen,

My comments in regard to the Environmental Impact Report 652519

- Section 3, Project Description, 3-11 "Deviations" section:** I am concerned with the deviations section regarding height increases for the RM-1-1 & RM-1-3 from 30 to 37 feet. Obviously, a means to add an additional story. In regions of existing single family residential and townhomes of 2 story character, this would be an egregious act in keeping with the community's character. In zones designated RM-2-4 through RM-3-7, this is again even further damaging the residential nature in place. In regards to frontages, side yards, and rear yards, these should be allowed only with judicious application and not wholly granted for the entire project.
- Section 8, Alternatives, Section 8.6.3 "Reduced Footprint Alternative":** This option is not acceptable at all. This proposes 4 to 6 story apartments with a height of up to 68 feet in height adjacent to 2 story residential homes. This would be worth a presidential impeachment, kidding of course, it would literally be an unbelievable move to allow that height, along with having 453 units having 1 egress and ingress drive lane onto Carmel Ridge Road. This would be insane. Apartments at unit 9 should not even be allowed to be developed adjacent to the single-family residences in my opinion.
- Section 5.17, Visual Effect/Neighborhood Character:** Figure 5.17-7 & 8 These illustrations of the proposed rowhouse and townhouse elevations is unbelievably bad esthetically, and exudes cheap construction econo-boxes ready for an architectural onion from the AIA. A much better example would be the Cypress development located at Brent Wilsey Place off of Carmel Ridge Road near Highland Ranch Road. In that development the building masses are well broken up with recesses and articulated components of the facades. I would hope that these some sort of eyewash for the EIR and not something that would be actually in consideration for the building and planning departments.

Please take these comments in sincerely in your evaluation of this EIR.

Regards,  
John Neighbors  
CA Architect 17162  
11914 Brewster Court  
San Diego, CA 92128  
(619) 807-5145

I I242-1

I242-2

I242-3

I242-4

I I242-5

- I242-1** The comment is an introduction to the comments that follow.
- I242-2** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Master Response 1** regarding the proposed deviations.
- I242-3** Refer to **Master Response 10** regarding alternatives.
- I242-4** Comment noted.
- I242-5** Comment noted.

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Comment Letter I243

Response to Comment Letter I243

243 Jim and Laura Peters

February 8, 2021

To our Entrusted City Leaders:

Regarding: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

From Jim and Laura Peters, We are original owners of a home on Unit one the old Hole #1 of Carmel Mountain Ranch. We have been blessed to enjoy such an amazing community, with great schools, ideal location to many jobs and a perfect environment to raise our family. We selected CMR Ranch not only for the spacious lots, open space and the golf course. We understand that our city needs more housing, especially those that support our communities like teachers and firemen and police etc. We therefore have never been 100% against some development, but had no idea this would be proposed. We believe that 1200 Townhomes all rentals, with 3-4 Story Massive buildings and no Single Family Detached homes, like 80% of the community is now, IS SIMPLY, TOO MANY UNITS, TOO TALL and TOO CLOSE. We are all about helping this housing goal and will support smart fair development that has respect for those living here today and those who will be able to move here in the future. We are excited that many new families will be able to call Carmel Mountain Ranch home, but we ask that you look closely at THREE areas of the EIR that clearly will have negative impacts on the CMR community.

1.) Reduced Density Alternative Should Be Much Smaller:

Section ES.8.2 Reduced Density Alternative- Please consider reducing the total # of units to 845 or less plan.

2.) Project Does Not Meet Objective to Provide a Range of Housing Types:

Project Objective 1, Section ES.3 does not meet More affordable housing What happened to the 55+ and Single Family Residences similar to those in the community today, seems like a great compromise to help " Maintain The CMR Community Character"

3.) Project Building Types and Setbacks Make it Incompatible with Existing Community

Please consider No More than 2 story Townhomes, and 3 story apartments. NO 3 story next to current 2 story homes and no 4 story buildings next to current 3 story.

Once again, we do support The Trails at CMR but would ask that you reconsider a more reasonable, less impactful number of units, built to match the community and no taller than existing structures. Thank you for your consideration.

Respectfully, Jim and Laura Peters 14090 Montfort Court

**I243-1** The City acknowledges the comment and notes it expresses general project opposition and serves as an introduction to the comments that follow.

**I243-2** Refer to **Master Response 10** regarding the selection of alternatives.

**I243-3** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

**I243-4** Refer to **Response to Comment I243-3**.

**I243-5** Comment noted.

I243-1

I243-2

I243-3

I243-4

I243-5

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Comment Letter I244

Response to Comment Letter I244

244 Tyrone and Jennifer Dill

February 7, 2021

Tyrone & Jennifer Dill  
13698 Fontanelle Place  
San Diego, CA 92128  
858-676-0401  
jenwdill@gmail.com

February 7, 2021

[DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

City of San Diego Development Services Department

Subject: Comments On the Trails at Carmel Mountain Ranch Environmental Impact Report

Project Number: 652519/SCH No. 2020039006

Dear San Diego Development Services Representative,

January 2021 officially marked our 23<sup>rd</sup> anniversary of moving into our "new" dream home in Carmel Mountain Ranch. We love our community and want to share a few of our concerns regarding the proposed Trails Development at Carmel Mountain Ranch.

- **AT RISK: Fire evacuation efforts in our community.**
  - We have endured two major fires in the area since 1998 and sat through an enormous amount of "emergency evacuation traffic". The increased number of residents proposed in the Trails project greatly impacts the traffic and potential safety of our family and our neighbors.
- **AT RISK: The current traffic flow in our community.**
  - We've witnessed the increase in rush-hour and weekend traffic since moving here. Adding 1,200 units will create more traffic in our "little" community than we have in urban San Diego communities.
- **AT RISK: Parking congestion in our community.**
  - Multi-unit homes bring multi-unit vehicles. The additional renter and guest street parking needed for the proposed units will potentially create a number of parking issues. We already have that problem near the apartment communities. The new units will make it much worse and current home owners in our "suburban" community will need to struggle with keeping an open "visitor" parking space in front of their homes.
- **AT RISK: The original character of our community.**
  - The "beauty" of the Carmel Mountain Ranch Community Plan, is completely compromised by the developers. Mitigation for additional open space is essential to keeping "some" of the aspects of the original plan in place.
  - We often walk through our community and love the neighborhood feel that attracted us here. The proposed Trails project seeks to replace the golf course open space that characterizes our community and "completely" fill it with concrete, multi-level, multi-unit housing that overwhelm the landscape and destroy the "foundation" of the original Community Plan.

Thanks in advance for your consideration,

*Tyrone & Jennifer Dill*

Tyrone & Jennifer Dill

I244-1

The comment serves as an introduction to comments which follow.

I244-2

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I244-3

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I244-4

Refer to **Master Response 3** regarding parking.

I244-5

Refer to **Response to Comment 02-11a** regarding open space.

I244-6

To clarify, the project will not completely replace the golf course property with development. Refer to **Response to Comment 02-11a** regarding open space. Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.



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Comment Letter I245

Response to Comment Letter I245

245 Frank Primiano

February 7, 2021

February 8, 2021

E. Shearer Nguyen And San Diego City Council:

This email concerns the EIR for the Trails at Carmel Mountain Ranch Project No. 652519/ SCH No. 2020039006.

I fully agree with the criticisms of the New Urban West 1200-unit project expressed in the statements sent you by the Sierra Club on January 23, 2021, and by Carmel Mountain Ranch United. However, I have a few additional points to bring to your attention.

As far as I can tell, the EIR doesn't adequately address the local fauna affected by this project. When the owners of the golf course cut down trees bordering the fairways to save money for water, they displaced the birds nesting in those trees, including protected woodpeckers. Consequently, these birds, looking for a place to live, attacked the houses along the golf course, making holes in the walls to set up residences. My neighbors and I have had to bear the expense of repairs and non-lethal deterrents to discourage them from destroying our property. This has been an on-going problem for several years. When the existing trees are removed to clear space for the proposed NUW construction, a new wave of these hole drillers will be loosed on the community for years to come. Who will pay for the damage they cause?

Furthermore, since the golf course has been unmaintained, vermin have dispersed into the surrounding neighborhoods. Rats and mice are now common visitors, damaging property (chewing wires and upholstery in cars) and potentially spreading disease. Building 1200 housing units and eliminating the habitat of their natural predators will only make the problem worse.

I live at the bottom of a sloping former fairway. When the golf course eliminated the grass fairways and planted native plants to save money on water, they didn't water the new

I245-1

I245-2

I245-3

I245-4

**I245-1**

The City acknowledges the comment and notes it expresses general project opposition and serves as an introduction to comments which follow.

**I245-2**

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Damage of existing homes is not a physical change to the environment.

**I245-3**

Refer to **Response to Comment I245-2**.

**I245-4**

Comment noted.

**I245-5**

Section 5.10, Hydrology, and Section 5.15, Public Utilities, of the Draft EIR considered the project's drainage and water use, respectively. Drainage and water use impacts were determined to be less than significant. Section 5.19, Wildfire, addressed the proposed brush management program. As shown in Table 5.19-1, Trails at CMR Brush Management Zones, of the Draft EIR, the project would include between 50 and 110-feet for brush management. The Draft EIR analyzed the potential for "downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes" and determined that impacts would be less

than significant. Refer to **Master Response 5** regarding wildfire impacts and brush management.

Regarding brush management and flood/mudslide control, the modified burn management zone approach includes an existing irrigated rear yard Zone 1 condition area (minimum 10 feet in width) and Zone 2 area that varies in width. The Zone 2 area would be planted/retain vegetation and only thinning and pruning would occur. No grubbing or removal of plant roots would occur which could cause increase in erosion.

Finally, the project would establish an independent HOA, separate from any existing HOAs and the long-term maintenance and preservation of open space resources on the project site would be the responsibility of a new Master HOA. The HOA would also be required to contract with qualified professionals for the long-term care and maintenance of the bioretention basins and brush management zones. The comment addresses subject areas, which received analysis in the Draft EIR.

plants. They relied on rainfall for moisture. This didn't work. The plants did not thrive, and when a major rainstorm occurred, the plants were washed away and could not retain the water. Mud swept down from the denuded hill and filled the sewer that drained the hill. Mud spilled into the adjacent street, blocking traffic. Mud and water also filled my backyard, flooding my patio and almost entering my house. I had to get a crew to remove the mud, which killed a section of my lawn.

The EIR addresses the danger of wildfires but doesn't deal with mudslides from the areas designated "open spaces." In order to retain the earth during heavy rains, there must be living plants. This requires regular watering. Who will pay for that water, which the golf course owners could not afford? I now have to pay for flood insurance and I live near the top of a "mountain." What provisions are being made to balance brush control (to mitigate wild fire danger) and flood/mud slide control?

Finally, the section entitled, "Cultural Resource Element," page 99 of the Carmel Mountain Community Plan, 2005 posting, discusses an "archaeological site retained in the open space as part of the golf course and preserved." Where is that site and what is being done to continue to preserve it?

Frank Primiano  
14003 Montfort Ct.  
San Diego, CA 92128  
858 774-8389

I245-4  
Cont.

I245-5

I245-6

## I245-6

Archaeological resources are analyzed in Section 5.9, Historical Resources, of the Draft EIR. The Draft EIR determined the project could cause a potentially significant impact to the site, as referenced in the comment, and the Draft EIR recommended mitigation measures **MM-HR-1** (avoidance of known cultural resources) and **MM-HR-2** (monitoring) to reduce the potential impact to below a level of significance. The location of the site in question is being kept confidential pursuant to CFP Title 36, Section 296.18, Confidentiality of Archaeological Resource Information. The comment addresses a subject area, which received analysis in the Draft EIR.

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Comment Letter I246

Response to Comment Letter I246  
246 Peter Anderson  
February 7, 2021

**From:** Peter Andersen <westone47@gmail.com>  
**Sent:** Thursday, February 4, 2021 3:55 PM  
**To:** Eric Edelman <edelmanrealty@gmail.com>  
**Cc:** DSD EAS <DSDEAS@san Diego.gov>; Kempton, Tony <KemptonT@san Diego.gov>; Prinz, Michael <MPrinz@san Diego.gov>; Hoeprich, Jack <JHoeprich@san Diego.gov>; marni@marnivonwilpert.com; Estrada, Stephanie <EstradaS@san Diego.gov>; Andrade, Evlyn <Evlyn.Andrade@sdcounty.ca.gov>; Peterson, Jeff <JAPeterson@san Diego.gov>; Kirsten Greer <kirstenla@gmail.com>  
**Subject:** [EXTERNAL] Re: CMRSSCC - Draft EIR Response 2/4/2021

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Received, thank you. Very nice job! An impressive response.  
Peter Andersen

On Thu, Feb 4, 2021 at 2:46 PM Eric Edelman <edelmanrealty@gmail.com> wrote:

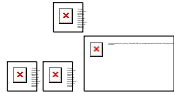
Carmel Mountain Ranch/Sabre Springs Community Council  
Attention: E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501, San Diego, CA 92101,

Project Name: Trails at Carmel Mountain Ranch  
Project No. 652519 / SCH No. 2020039006  
Community Plan Area: Carmel Mountain Ranch  
Council District: 5

Attached is our CPG's combined comments/response to the draft EIR for the above-referenced project. This document was unanimously approved by our board. Please confirm receipt of this email and the attached document.

Thank you,

Eric Edelman - CMRSSCC Chairperson  
--  
Eric Edelman - Realtor  
Century 21 Award Realty  
858-673-7573 - Office  
619-300-3254 - Cell  
[edelmanrealty@gmail.com](mailto:edelmanrealty@gmail.com)  
CALBRE01430056



I246-1      Comment noted.

I I246-1

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Comment Letter I247

**From:** MSafar <msafar@gmail.com>  
**Sent:** Monday, February 8, 2021 5:27 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Musa <msafar@gmail.com>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Thanks for taking the time to read this.

I took a quick look at the CMR EIR and have many concerns. Here are some of the concerns I have just to list a few.

Will miss all the wildlife that moved in in the last 2 years, quail, road runners, pelicans, coyotes, red hawks, bobcats, and many kinds of birds.

Back in 2007 during the October fires we were unable to evacuate. With more residents in the area, evacuation plans are not addressed enough in the EIR.

The majority of existing homes are two store homes while the new project does not list any 2-store houses. The new buildings 3-4 multi store buildings that don't fit in the character of CMR.

The distance between existing houses and new buildings is not adequate. Privacy and noise are big concerns to us.

Regards,

Musa Safar

14059 Via Corsini, San Diego, CA 92128

I I247-1

I I247-2

I I247-3

I I247-4

I I247-5

Response to Comment Letter I247

247 Musa Safar

February 7, 2021

**I247-1** The comment serves as an introduction to comments which follow.

**I247-2** Biological resources were addressed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources were determined to be less than significant with mitigation incorporated.

**I247-3** Emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I247-4** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.



- I247-5** Noise was address in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment 02-13a** regarding buffers. Refer to **Response to Comment I247-4** regarding community character. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I248

February 3, 2021

E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501, San Diego, CA 92101

Project Name: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

Dear Ms. Shearer-Nguyen,

I support an endeavor to develop our community as long as it has a balanced approach with needed changes to ensure it has minimal impact to the health and safety of our community. These are my top 3 major concerns:

1. **Fire evacuations:** We've lived through several major fires that have impacted our community. Even without this proposed 25% increase in housing, the roads were backed up during the fires making it difficult to leave our area. My family lives right next to the existing CMR club house where the plan is to develop 3 to 4 story apartments along with 2 to 3 story condominiums on the back side of my house on the 10<sup>th</sup> hole. During the fires, Poway and CMR residents fled using Ted Williams Highway to get to 15 and both were jammed. Firetrucks and emergency vehicles were racing down those same roads. We were all in darkness with thick smoke and live embers in the air making it impossible to see very far let alone breathe. The developer's plan is to exit new residents on these same existing roads that lead to Ted Williams and Interstate 15. It is irresponsible to even consider that this development plan will not hinder people's safety as we try to leave our community during future fires.
2. **Multi-Story Apartments/Condos:** This is a major egregious impact to this area of mainly single family homes. There is one existing apartment building, 4 stories in the area but the bottom 2 stories are in below sight since the land was cut below grade. Across from my house is a 4 story apartment building planned right next to nothing but single family homes.
3. **The Trails:** Trails, if done correctly, is an excellent idea but the developer's plan is woefully inadequate. Use of the existing golf cart paths are inadequate for people walking both directions, bike riding nor are they ADA compliant. Many of the paths are sloped sideways, some are steep and slippery. The tunnels if updated are a great way to allow people to cross busy streets and there needs to be a plan to ensure they remain safe for families to use.

Please adjust the developer's plan down below the 25% housing increase and ensure the developer pays for and executes the proper changes needed to support the health and safety impact to our community before their project is done. A change of this scope must have a responsible integration.

Thank you for your consideration.

*Cecile Neighbors*

Cecile Neighbors  
11914 Brewster Court  
San Diego, CA 92128  
(858)829-6160

Response to Comment Letter I248

248 Cecile Neighbors

February 3, 2021

**I248-1** The comment serves as an introduction to comments which follow.

**I248-2** Emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I248-3** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

**I248-4** Refer to **Master Response 3** regarding the proposed trails and for a discussion pertaining to ADA accessibility. Specific to the issue of the pedestrian tunnels, the analysis for General Plan Policy UD-A.13 included in Draft EIR Table 5.1-2 explained that, the project would incorporate safety lighting throughout the project site for security purposes. Public spaces (i.e., privately owned recreation amenities with a Recreation Easement recorded over them) would also be clearly marked and would be open for public use during designated hours. However, pedestrian lighting would be provided to increase on-site safety, visibility, and wayfinding throughout the site during nighttime hours.

**I248-5** Comment noted.

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Comment Letter I249

From: MATASABURO YOSHIKAWA <myoshika@att.net>  
Sent: Saturday, February 6, 2021 2:50 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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"My wife and I are against the construction of the new housing units in our community.  
  
We have been living in this peaceful community for decades, and the new construction will cause more traffic which could increase the possibility of an unsafe environment for all.  
  
The development would hinder any peace that has been created over the years from the home owners, and the mix of rental properties within our community is not what we look forward to. "  
  
Matasaburo Yoshikawa

I I249-1  
I I249-2  
I I249-3

Response to Comment Letter I249  
249 Matasaburo Yoshikawa  
February 6, 2021

- I249-1      Comment noted.
- I249-2      Traffic is discussed in Section 5.2, Transportation/  
Circulation, of the Draft EIR. Transportation/  
circulation impacts were determined to be significant  
and unavoidable. Refer to **Master Response 3.**
- I249-3      Potential impacts pertaining to compatibility with  
community character are addressed in Section 5.17,  
Visual Effect/Neighborhood Character, of the Draft  
EIR. The Draft EIR determined the project’s impacts  
would be considered less than significant. Refer to  
**Master Response 2.**

INTENTIONALLY LEFT BLANK

Comment Letter I250

From: judimcc@san.rr.com <judimcc@san.rr.com>  
Sent: Saturday, February 6, 2021 2:28 PM  
To: DSD EAS <DSEAS@san.rr.com>  
Subject: [EXTERNAL] Project Name: Trails at Carmel Mountain Ranch, Project Number: 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

**Project Name:** Trails at Carmel Mountain Ranch  
**Project Number:** 652519/SCH No. 2020039006  
**Community Plan Area:** Carmel Mountain Ranch  
**Council District:** 5

February 6, 2021

Dear Ms. Shearer-Nguyen,

As 30-year residents of Carmel Mountain Ranch, we have the following concerns regarding the Draft Environmental Impact Report for the proposed development of 1,200 units on the former Carmel Mountain Golf Course.

ES.3 Project Objectives

1. The planned housing types are NOT compatible with the adjacent established residential communities. Carmel Mountain Ranch is 52% single-family homes. The Project would replace the open space, natural terrain with apartments, townhomes and condos (100%), all multi-unit buildings, 3-4 stories high, which would significantly change the character of Carmel Mountain Ranch. The California Environmental Quality Act (CEQA) states that development must not violate the character of the General Plan.

3. The majority of the Project site would NOT be preserved as open space, as development is planned on 11 of 18 former golf course fairways. Therefore, there would be a 61% reduction of open space. The golf course is a recognized Parks and Recreational Open Space per the City's General Plan.

4. The Project would NOT replace dead and dying vegetation associated with the vacant and blighted golf course with drought-tolerant, native landscaping. Rather, the Project would decimate the natural topography, flora, fauna and wildlife by replacing it with multiple 3-4 story buildings on 61% of the former golf course's open space, which is the majority of open space in Carmel Mountain Ranch.

7. The Project is NOT respectful of existing properties or existing residents. Conversely, the Project consists of 100% 3-4 story multi-unit buildings for apartments, condos and townhomes that would be erected on 11 of 18 former golf course fairways. These gigantic buildings would literally be in existing residents' backyards and side yards. The existing homes have wrought iron fences in the back yards that allow residents to enjoy the scenic views of open spaces and natural terrain, and to gaze at various wildlife that have made it their home. Their scenic views would be eliminated and replaced by 3-4 story buildings, parking lots, roads, and people.

I250-1

I250-2

I250-3

I250-4

I250-5

Response to Comment Letter I250

250 Michael and Judi McCarter

February 6, 2021

I250-1

The comment serves as an introduction to comments which follow.

I250-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I250-3

Refer to **Response to Comment 02-11a** regarding open space.

I250-4

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated.

I250-5

Refer to **Response to Comment I250-2** regarding community character. Refer to **Master Response 2** regarding private views.

ES.9 Transportation/Circulation. Even after mitigation measures, the EIR acknowledges that “the project will continue to have a significant and unavoidable VMT transportation impact” (5.2- 10). This admission indicates clearly that the Project will have long term negative impacts on traffic and greenhouse gas emission (GHG). Therefore, this does NOT demonstrate a benefit or improvement to the community, rather the increased traffic (Vehicle Miles Traveled/VMT) would result in clogged surface streets and highways (I-15 and SR 56).

Section 5.1 Land Use. Issue 4. The Project WOULD physically divide an established community. Existing homes were built in and around the former golf course. As stated in The Community Plan, Parks and Open Space Element, “Incorporation of the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole.”  
The former fairways provide scenic open space with views of the natural environment, wildlife and the continuity of the community. Erecting multiple 3-4 story buildings on 11 of 18 narrow fairways would be placing humongous barriers that physically separate the established community.

Table 5.1-2 Project’s Consistency with City of San Diego’s General Plan. Policy UD-A.3.  
The Project will NOT minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain. Conversely, the Project proposes to level the existing natural slopes and hillsides on 11 of 18 existing golf course fairways to create large level pads.

#### 5.13 Population and Housing

The EIR acknowledges that “the Project would directly induce substantial population growth to the area based on the currently adopted Housing Element (City of San Diego 2013) and impacts would be potentially significant (Impact PH-1). No feasible mitigation exists to reduce or avoid these potentially significant impacts absent a feasible alternative to the proposed project.”  
These admissions confirm that this Project would result in a significant, unmitigable impact on Transportation, Population and Housing, and Public Services and Facilities. Shoehorning 1,200 housing units and 3,180 residents into the open space of a master-planned community is in violation of the Community Plan.

#### 5.19.3 Wildfire Risk and Evacuation Capacity

The EIR acknowledges that the Project is located in a Very High Fire Severity Zone. The EIR further acknowledges that the VTM Analysis shows there would be a significant and unavoidable impact (32-43% above the VMT significance threshold of 16.2), even with inclusion of travel demand management measures. The EIR concludes that there will be unmitigated impacts to Transportation, even during normal daily activities. In the event of a wildfire, surface streets would become gridlocked and there would be bottlenecks at the entry ramps to the I-15 and SR 56, which would prevent residents from safely evacuating the area.

In addition to the projected increase of 3,180 residents from this Project, there are new developments underway including Alante 100 residents (50 units) located at 10200 Rancho Carmel Road, in front of the Project site (2 fairways) and development 1 mile from Carmel Mountain Ranch, across the I-15 that would add another 3,890 residents from 1,468 units: The Junipers (536 units), Pacific Village (601 units), Millennium PQ (331 units). Increasing the density to this level in the Carmel Mountain area would overwhelm the current infrastructure, and clog the surface streets, freeway I-15 and SR 56.

I250-6

With respect to traffic, the comment is correct that the project would result in a significant and unavoidable transportation/circulation impact. The City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project. Refer to **Master Response 3**.

Greenhouse gas emissions were addressed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 8**.

I250-7

Regarding the comment that the project would divide an established community, as analyzed in Section 5.1, Land Use, of the Draft EIR, “The proposed project would not construct structures that have the potential to physically divide an established community (such as large roadways, extension of physical barriers).” Further, “[t]he golf course, which is private property, was not available for public use during previous operation and is currently fenced preventing public access. The proposed project would include 6 miles of publicly accessible trails that would provide increased connections between the proposed project and the surrounding community.” As a result, the Draft EIR determined that impacts would be less than significant, and the comment does not

ES.9 Transportation/Circulation. Even after mitigation measures, the EIR acknowledges that “the project will continue to have a significant and unavoidable VMT transportation impact” (5.2- 10). This admission indicates clearly that the Project will have long term negative impacts on traffic and greenhouse gas emission (GHG). Therefore, this does NOT demonstrate a benefit or improvement to the community, rather the increased traffic (Vehicle Miles Traveled/VMT) would result in clogged surface streets and highways (I-15 and SR 56).

I250-6

Section 5.1 Land Use. Issue 4. The Project WOULD physically divide an established community. Existing homes were built in and around the former golf course. As stated in The Community Plan, Parks and Open Space Element, “Incorporation of the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole.”  
The former fairways provide scenic open space with views of the natural environment, wildlife and the continuity of the community. Erecting multiple 3-4 story buildings on 11 of 18 narrow fairways would be placing humongous barriers that physically separate the established community.

I250-7

Table 5.1-2 Project’s Consistency with City of San Diego’s General Plan. Policy UD-A.3.  
The Project will NOT minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain. Conversely, the Project proposes to level the existing natural slopes and hillsides on 11 of 18 existing golf course fairways to create large level pads.

I250-8

#### 5.13 Population and Housing

The EIR acknowledges that “the Project would directly induce substantial population growth to the area based on the currently adopted Housing Element (City of San Diego 2013) and impacts would be potentially significant (Impact PH-1). No feasible mitigation exists to reduce or avoid these potentially significant impacts absent a feasible alternative to the proposed project.”  
These admissions confirm that this Project would result in a significant, unmitigable impact on Transportation, Population and Housing, and Public Services and Facilities. Shoehorning 1,200 housing units and 3,180 residents into the open space of a master-planned community is in violation of the Community Plan.

I250-9

**I250-8**

Refer to **Response to Comment I250-7** regarding land use consistency.

#### 5.19.3 Wildfire Risk and Evacuation Capacity

The EIR acknowledges that the Project is located in a Very High Fire Severity Zone. The EIR further acknowledges that the VTM Analysis shows there would be a significant and unavoidable impact (32-43% above the VMT significance threshold of 16.2), even with inclusion of travel demand management measures. The EIR concludes that there will be unmitigated impacts to Transportation, even during normal daily activities. In the event of a wildfire, surface streets would become gridlocked and there would be bottlenecks at the entry ramps to the I-15 and SR 56, which would prevent residents from safely evacuating the area.

I250-10

**I250-9**

Refer to **Response to Comment I250-7** for land use consistency information and **Response to Comment I250-6** for information on the statement of overriding consideration that the decision makers must adopt to approve the proposed project.

In addition to the projected increase of 3,180 residents from this Project, there are new developments underway including Alante 100 residents (50 units) located at 10200 Rancho Carmel Road, in front of the Project site (2 fairways) and development 1 mile from Carmel Mountain Ranch, across the I-15 that would add another 3,890 residents from 1,468 units: The Junipers (536 units), Pacific Village (601 units), Millennium PQ (331 units). Increasing the density to this level in the Carmel Mountain area would overwhelm the current infrastructure, and clog the surface streets, freeway I-15 and SR 56.

I250-11

**I250-10**

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I250-11**

To clarify, only the southern portion of the project site is in a Very High FHSZ, and for the other cumulative projects, only the Junipers is in a Very High FHSZ. Further, all of the cumulative projects include brush management programs and fire-smart design principles to ensure compliance with the California



Traffic jams and clogged streets, freeways and highways are not conducive to a successful evacuation of all residents during a wildfire in the area. Residents from both sides of the I-15 would need to evacuate onto the I-15 at Carmel Mountain Road. Therefore, in the event of wildfire, this situation would be detrimental to the community.

The EIR acknowledges that the Project's contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant. The inability to evacuate quickly, successfully and safely would result in the loss of many lives. How is this acceptable?

The EIR does NOT contain an analysis of fire risk or evacuation times that includes the increase of 4,810 vehicles and 7,170 residents to access the I-15 and SR 56.

The EIR does NOT address an evacuation plan for the increase of 4,810 vehicles and 7,170 residents or determine if a safe evacuation of all residents is even possible.

#### 5.7 Greenhouse Gas Emissions. Transit Priority Area (TPA)

The EIR acknowledges that only 11% of the Project (Units 5 and 6) is located within a TPA. The majority of the Project (89%) is 1 ½ miles from the MTS Sabre Springs/Peñasquitos Transit Station. Most of the new residents would still drive vehicles, resulting in overcrowded streets.

Additionally, according to an August 14, 2020, Union-Tribune article, The San Diego Association of Governments (SANDAG) is proposing a \$177B, 30-year transit plan that provides NO high-speed or light rail to Carmel Mountain Ranch, only more busses, and a bus route on the SR 56.

#### Section 5.4 Biological Resources. Wildlife

The former golf course represents the majority of open space in Carmel Mountain Ranch. Eliminating the golf course fairways to construct multiple 3-4 story buildings would destroy the areas that are home to various wildlife, flora and fauna, as well as the unobstructed views of the natural environment for existing residents. The last biological survey was conducted in August 2019. Since the golf course closed and the land returned to its natural state, the number and species of plants and animals has increased significantly and should be protected. The EIR should include a recent biological survey to ensure that animals and birds that are protected under the Federal Endangered Species Act and the Migratory Bird Treaty Act are listed and their future protection addressed.

#### Air Quality

##### Table 5.5-1. Hours of Operation for Construction Equipment Reduced Air Quality and Pollution

The EIR states that "diesel-fueled construction equipment would operate for an estimated 426,832 hours", which will produce massive amounts of unmitigated GHG, resulting in pollution of the air. The construction sites for this Project are fairways of the closed golf course, located literally in the front, back and side yards of the existing homes. In addition to the close proximity to the homes, there are sidewalks that wind all around these fairways. This large construction project involves 11 separate sites. These construction sites, which are located within existing neighborhoods and surrounded by thousands of homes, would produce significant air pollution, dust and dirt (even with mitigation), which would have a significant detrimental effect on the health of residents, especially those who already suffer from asthma, COPD, emphysema and lung disorders.

A1-11  
Cont.

I250-12

I250-13

I250-14

I250-15

Building Code and Consolidated Fire Code. In addition, the projects would not all be evacuated at the same time. Rather, each fire event is managed by an Incident Command (IC) who would make decisions in real time to determine which, if any, neighborhoods, and communities were safe to evacuate. Such factors that would be considered include traffic/gridlock, weather and wind patterns and the likely path of travel for the fire, presence of defensible space to defend structures and neighborhoods, and other considerations. Refer to **Master Response 5**. The comment addresses a subject area, which received analysis in the Draft EIR.

**I250-12**

Refer to **Response to Comments I250-10** and **I250-11**.

**I250-13**

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

**I250-14**

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. Biological surveys were conducted in accordance with the City's guidelines and were performed after the golf course closed. In addition to survey results, the biological resources analysis also considered what species were likely to occur in the project

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| <p>Section 6 Cumulative Effects.</p> <p>In addition to the projected increase of 3,180 residents (1,200 units) from this Project, there are new developments underway, including Alante 100 residents (50 units) located at 10200 Rancho Carmel Road, in front of the Project site (2 fairways) and development 1 mile from Carmel Mountain Ranch, across the I-15 that would add another 3,890 residents (1,468 units): The Junipers (536 units), Pacific Village (601 units), Millennium PQ (331 units). Increasing the density to this level in the Carmel Mountain area would overwhelm the current infrastructure, and clog the surface streets, freeway I-15 and SR 56.</p> <p>The EIR acknowledges that the Project's contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant. Therefore, in the event of wildfire, this situation would be detrimental to the community, and possibly deadly. Traffic jams, clogged streets, and bottlenecks at freeways and highways are not conducive to a successful evacuation of all residents during a wildfire in the area. Residents from both sides of the I-15 would need to evacuate onto the I-15 at Carmel Mountain Road. The EIR does NOT contain an analysis of fire risk or evacuation times that includes the increase of 4,810 vehicles and 7,170 residents that would need to access the I-15 and SR 56. The EIR does NOT address an evacuation plan for the increased number of vehicles (4,810) and residents (7,170) or determine if a safe evacuation of all residents is even possible.</p> <p>Project Alternatives</p> <p>The EIR does NOT provide any viable alternatives as required by the CEQA. Most of the former golf course is zoned as AR-1-1 (Agriculture). Feasible alternatives would include utilizing the former golf course as sustainable community gardens where participants share in the maintenance and products of the gardens that produce healthful, affordable fresh fruits and vegetables; converting the open space into parkland; establishing a vineyard; allowing the Carmel Mountain Ranch community to purchase the individual parcels (former fairways) under the AR-1-1 zoning.</p> <p>We are not opposed to sensible development that would benefit the community and the City of San Diego. However, increasing the population by 25% would cause overcrowded surface streets, highways (I-15, SR 56), stores, restaurants, businesses, and their associated parking lots. In the event of necessary evacuation due to wildfires in the area, this high-density development would put at risk the lives of all the people who live in the community and would have a negative impact on the quality of life for existing and new residents of Carmel Mountain Ranch.</p> <p>Mixed-use development that would utilize existing empty commercial buildings for conversion to apartments and condos would provide additional housing without over-developing a master-planned community that has already been fully "built out".</p> <p>Thank you for your consideration of our concerns regarding the Draft Environmental Impact Report.</p> <p>Respectively,</p> <p>Michael and Judi McCarter<br/>Residents of Carmel Mountain Ranch since 1991<br/>14042 Chestnut Hill Lane<br/>San Diego, CA 92128</p> | I250-16 |                | area; thus, even if certain species were not observed their presence is still assumed. Section 5.4, Biological Resources, analyzes the proposed project's impacts to biological species, including species protected under both the Federal and State ESAs and the Migratory Bird Act Treaty. Impacts were found to be potentially significant, and mitigation is provided to reduce impacts to less than significant levels. Finally, refer to <b>Master Response 2</b> regarding private views. The comment addresses subject areas, which received analysis in the Draft EIR.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | I250-19 |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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**I250-18** Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. Refer to **Response to Comments I250-10** and **I250-11** regarding wildfire and evacuation. The comment addresses subject areas, which received analysis in the Draft EIR.

**I250-19** Refer to **Master Response 10** regarding alternatives.

**I250-20** Comment noted.

Comment Letter I251

**From:** Mike Sperry <mbsperry@aol.com>  
**Sent:** Monday, February 8, 2021 9:44 AM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Troy@WealthAnalytics.com <Troy@WealthAnalytics.com>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern:

Before making a decision regarding the New Urban West proposed development project, I ask that you take a quick look at the attached photo of our Carmel Mountain Ranch master planned community. I took this photo while on a mountain bike ride in nearby Black Mountain Open Space Park a few months ago. This photo graphically illustrates how integrated the golf course is in our community – it is impossible to discern where the 18 fairways lie because they are so intertwined with housing. New Urban West proposes to build four story buildings where the fairways now lie – forever changing the character of our beautiful San Diego community and increasing density by close to 25%. Will this project be able to be built without permanently, adversely affecting our quality of schools, community character, and ability to safely evacuate from the next wildfire?

Respectfully,

Michael Sperry  
 11835 Wilmington Rd.  
 San Diego, CA 92128

Sent from [Mail](#) for Windows 10

I251-1

**Response to Comment Letter I251**

**251 Michael Sperry  
 February 8, 2021**

**I251-1**

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.



I251-1  
Cont.

Comment Letter I252

From: Mike <m.aguiar7550@att.net>  
Sent: Monday, February 8, 2021 11:13 AM  
To: DSD EAS <DSEAS@sandiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Dear Planning Committee,

I'm writing today to submit a formal comment about concerns with the proposed development plan "The Trails at Carmel Mountain Ranch" Project number 652519/SCH No. 2020039006. Understandably there is a lot of fear surrounding this project. Fear of how will the project affect the quality of life for current residents in Carmel Mountain Ranch and fear of how will the current infrastructure integrate with the proposed additional communities.

In regard to infrastructure I have two main concerns that I do not believe were adequately covered in the impact study. My first concern is how will the current sewer infrastructure be able to handle the additional volume from these new communities? I understand that the new communities may have sewer pipes with a large enough diameter but what about the existing sewer pipes that those will integrate into? I'm assuming those were installed with the intent that Carmel Mountain Ranch will only grow to the size it is today. If the existing sewer infrastructure is overwhelmed that could result in costly damage to existing residents due to main line back ups.

The second concern I have is the water pump station. Currently, there is a water pump station just above Shoal Creek Elementary School. The impact study mentioned the plan is to upgrade that pump station. My concern is, how will the current infrastructure handle the added pressure to the water system. That station was designed over twenty years ago and integrates into older pipes. Increasing water pressure to the legacy infrastructure could also result in costly damage to current residents. Even a small increase in pressure can burst pipes causing floods and other damage.

A final note on quality of life. Projects like this are not completed overnight. They take years and disrupt the community. There are many families who moved to Carmel Mountain Ranch with the hope to provide a peaceful environment for their children to grow up in. If the proposed project is approved families with children in high school will be forced to endure their final years with their children at home in a stressful construction zone. It is also still unclear how the current school infrastructure will be able to handle the added volume of children.

I252-1

I252-2

I252-3

I252-4

Response to Comment Letter I252  
252 Mike and Wendy Aguilar  
February 8, 2021

I252-1

Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant utility infrastructure impacts with mitigation incorporated. The comment addresses a subject area, which received analysis in the Draft EIR.

I252-2

Refer to **Response to Comment I252-1** regarding utility infrastructure.

I252-3

Refer to **Response to Comment I252-1** regarding utility infrastructure.

I252-4

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

As a city I agree we must progress and add more housing options for future generations to have the same opportunities for a safe and peaceful place to live. However, the proposed plan is excessive and misses the mark on harmoniously integrating into a community that has been established over 20 years. Upon reviewing the plan please keep these concerns in mind and ask the question, will this development integrate harmoniously? Or, will this development push the existing community and its infrastructure to the limit?

Regards,

Mike & Wendy Aguilar  
Carmel Mountain Ranch Residents

I252-5

**I252-5**

Refer to **Response to Comment I252-4** regarding community character. Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I253

Response to Comment Letter I253  
253 Mike Sperry (2)  
February 7, 2021

From: Mike Sperry <mikesperry134@gmail.com>  
Sent: Sunday, February 7, 2021 4:04 PM  
To: DSD EAS <DSDEAS@sanidago.gov>  
Cc: Troy@WealthAnalytics.com  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To whom it may concern -

My name is Mike Sperry, and I and my wife are 25 year residents of Carmel Mountain Ranch (CMR). I would like to begin by stating that I agree that we as a city could have done a better job of planning for more housing to accommodate expected growth in our beautiful city. I recognize that New Urban West's (NUW) proposed development will be very profitable for those promoting it, and will certainly increase available housing, but I do not agree that it is an equitable or smart solution to the city's housing shortage. As attractive an option closed golf courses often can be, the CMR golf course is different - every hole of this 18-hole course winds thru and infiltrates the entire community. It does not encompass one large square parcel of land, as most courses do, but rather the entire community. Both sides of 15 fairways are lined with homes - unlike most traditional courses that only impinge on backyards around the perimeter of the course. Two of the three exceptions, which are only lined by homes on one side of the fairway, abut the I-15 freeway - coincidentally not where NUW has proposed building. The layout of this golf course was designed to improve the character of the master planned community, yet now would simply serve to greatly increase the adverse impacts of building hundreds of rental units and condos in the back yards of so many.

My biggest concern with the NUW proposal (traffic, noise, and congestion notwithstanding) - is the reality of living in an overpopulated community during the next wildfire. I can attest to this risk -- I was leading a boy scout campout in the nearby city of Ramona the morning the 2003 Cedar fire started. We woke to what looked like a thunderstorm looming to the east - as soon as we recognized it to be smoke from a fire we quickly broke down camp and exited the campground. 60' flames raced down the hillsides towards us and we could feel the intense heat thru our vehicle windows as we sped down Dos Picos Park Road to escape. There was no traffic, as Ramona is much more sparsely populated than CMR, and I shudder to think what would have happened had we had encountered any. As I finally, safely arrived in our CMR neighborhood, 7 miles away, it became apparent to me the risk we already face with the current number of existing homes and the proximity of Carmel Mountain Ranch Open Space directly south. Adding 1,200 homes to our small community will surely increase risk to all when the next wildfire strikes.

I253-1  
I253-2  
I253-3

I253-1 Comment noted.

I253-2 Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2.**

I253-3 Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5.**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to Master Response 3.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise Impacts were determined to be less than significant with mitigation incorporated. Refer to Master Response 4. The comment addresses subject areas, which received extensive analysis in the Draft EIR.



Finally, I would like to make a point regarding the problem of housing availability in San Diego. I am a retired Marine Corps colonel, current United Airlines captain and long time resident of CMR. I live there with my wife of 33 years, where we have raised three sons. The oldest earned a masters in aeronautical engineering from UCSD and works at Northrop Grumman. He recently bought a townhouse in south Escondido, an area that he was able to afford. My second son graduated from Cal State Fullerton and rents a condo in Orange County. My youngest is a second year student at MIT. Although all three have worked hard, none have an expectation to be able to afford housing in our area at this stage of their lives. Nor did I at their age - in fact for several years I worked 3 jobs simultaneously in order to afford the house I now own in CMR. A beautiful, modest house in a master planned community with a golf course. Opportunity exists in our country for those willing to work for it - that's the America I grew up in and served for 28 years. I have heard many arguments that we need to make San Diego an affordable place to live - apparently for anyone who decides they want to come - yet I disagree. We are extremely fortunate to live in a beautiful city with arguably the best weather in the world - yet we seem to think that anyone who wants to should be able to afford housing here, at the expense of those who have worked hard and have earned the privilege. When I was a young officer in the Marines, I rented a townhouse and commuted to work. I now can afford to live in CMR, but don't expect housing in my price range to be made available to me on the ocean in La Jolla. I own a modest home with a very small yard, and have the option to move farther from downtown if I want to afford a larger house on a larger plot of land. I chose San Diego because I do not want to live in a New York City, a Los Angeles City, or any other city that has become choked by overpopulation.

I appreciate the time you have taken to read this response, and am confident a responsible decision will ultimately be made regarding the NUW development project.

Respectfully,

Mike Sperry  
Concerned citizen  
11835 Wilmington Rd. San Diego, CA 92128

Sent from [Mail](#) for Windows 10

I253-4 Comment noted.

I253-5 Comment noted.

I253-4

I253-5

Comment Letter I254

From: mvallend@san.rr.com <mvallend@san.rr.com>  
Sent: Monday, February 8, 2021 4:36 PM  
To: DSD EAS <DSDEAS@san.rr.com>  
Cc: 'Troy@WealthAnalytics.com' <Troy@WealthAnalytics.com>; 'mvallend@san.rr.com' <mvallend@san.rr.com>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom It May Concern:

I bought my home in Collage in CMR in December 1993. One of the major attributes that attracted me to my home was the fact the community had a golf course and the open space that provides. I am extremely disappointed the golf course is no longer in operation and I am even more disappointed it is proposed to be replaced with high density housing which will take away our open space and replace it multi family multi story buildings. This proposed high density housing and its parking lots will only create eyesores throughout our beautiful community. All this additional housing will also make the traffic and congestion in our neighborhoods and surrounding areas dramatically worse than it is today. This land should continue to be used in a manner that is consistent with the original overall design and layout of the community. That is what we agreed to when we signed our purchase contracts.

Thank you,

Mike Vallender  
11955-1 Tivoli Park Row  
San Diego, CA 92128  
858-774-7405

I254-1  
I254-2  
I254-3

Response to Comment Letter I254  
254 Mike Vallender  
February 8, 2021

- I254-1
- Refer to **Response to Comment 02-11a** regarding open space.
- I254-2
- Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**.  
  
Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.
- I254-3
- Comment noted.

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Comment Letter I255

**From:** paula.bessey <aussieaussiepb@gmail.com>  
**Sent:** Saturday, February 6, 2021 6:19 AM  
**To:** DSD EAS <DSEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and City Council;

Our family chose to buy a modest home in Carmel Mountain Ranch in Cambridge 17 years ago for the layout and sense of community spirit.

**Concerns;**

**Streets and traffic.**

How much more time is going to be added to ones commute to work?

The streets are in disarray and already burdened with traffic especially Ted Williams Parkway, I-15 on and off ramps, Rancho Carmel Drive, Highland Ranch Road, Carmel Mountain Drive, Camino Del Norte will be congested even further.

The planned development within an already congested planned housing will be a disaster and put families at risk in case of fire or other emergencies.

There would be no possible safe escape routes for residents.

**City services.**

Approximately 4 1/2 years ago our community had re-paved our streets at the cost of \$400,000. Almost immediately after and still continuing, our newly paved streets have been dug up by the city to fix sewer and water pipes and sometimes twice!

Last month, the city had to come out on an emergency basis after being contacted weeks before notifying of a problem. A pipe was not fixed properly and water started coming up from the asphalt!

Who knows how long the water has been running under the streets which could have created potential for a sink hole.

How much more strain will be placed on our sewer and water pipes with this proposed development?  
 What will the response time be for the city to come out make repairs and properly patch our streets in the community?

**Noise pollution.**

Why are residents asked to accept additional noise and peoples hearing, especially children's, affected?

Majority of homes cannot open their dual pane windows.

Carmel Mountain Ranch is still missing the noise wall that was funded and never built (where did these funds go?) along the East side of I-15 and I/15 north Ted Williams Parkway exit to Carmel Mountain Ranch exit.

Response to Comment Letter I255

255 Paula Bessey  
 February 6, 2021

**I255-1** The City acknowledges the comment and notes it is an introduction to the comments that follow.

**I255-2** Under CEQA, level of service (i.e., vehicle delay) is no longer an applicable measure of a project's impact on transportation, rather, traffic impacts are based on vehicle miles traveled. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts and cumulative transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I255-3** Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I255-4** Regarding impacts to public utilities, the Draft EIR analyzed impacts to water, sewer and storm drain systems in Section 5.15, Public Utilities, and determined that with implementation of the required mitigation measures, impacts would be reduced to less than significant levels. All improvements would be performed in accordance with the city's engineering and design requirements.

Carmel Mountain Rec Center with baseball field, basketball court, playgrounds and Communities; Cambridge and Waterford Laurels are butted to this main corridor.

The city wants to add further to the noise off this area as well as the noise off Rancho Carmel Drive where the decibel noise levels are already well over the CalOsha requirements?

I have asked about this noise wall in the past and have been given the run around and no answer ever provided. (Communications included at bottom of email)

Our family is in complete agreement with the letter sent to you by the Sierra Club San Diego Chapter 8304 dated January 23, 2021 and their Environmental Impact Report, Trails at Carmel Mt. Ranch Environmental Impact Report Project No. 652519 / State Clearinghouse No. 2020039006

Carmel Mountain Ranch was planned a long time ago. The residents invested in this community have the rights to continue living in this community as it was planned.

Thank you.  
Paula Bessey  
10384 Rancho Carmel Drive, San Diego CA 92128  
619.602.9809

↑  
I255-6  
Cont.  
  
|  
I255-7  
  
|  
I255-8

- I255-5** Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise Impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses subject areas, which received extensive analysis in the Draft EIR.
- I255-6** Refer to **Response to Comment I255-5** regarding noise. To clarify, the applicable threshold for noise impacts is not California Occupational Safety and Health Administration (Cal/OSHA) standards, but the City's Noise Ordinance.
- I255-7** Refer to **Response to Comment Letter O1**.
- I255-8** Comment noted.

Supporter of Jay Sekulow, American Center for Law & Justice

On Jun 7, 2019, at 11:59 AM, Siordia, Brittney <[BSiordia@saniego.gov](mailto:BSiordia@saniego.gov)> wrote:

Good morning Paula

Thank you for contacting our office. I am your Community Representative for Councilman Kersey's office. I addressed this issue with a few different staff members and the best option for moving forward with this concern would be to contact Assembly-member Brian Maienschein's office, as this would fall under CalTrans rather than the City of San Diego.

Assembly Member Maienschein's local office #: [\(858\) 675-0077](tel:8586750077)  
Assembly Member Maienschein's Capitol Office #: [\(916\) 319-2077](tel:9163192077)

If you have any other questions, feel free to contact our office!

Best,

Brittney Siordia  
Council Representative  
Councilmember Mark Kersey  
City of San Diego - Council District 5  
[\(619\) 236-6655](tel:6192366655)

Disclosure: This email is public information. Correspondence to and from this email address is recorded and may be viewed by third parties and the public upon request.

-----Original Message-----

From: Paula [<mailto:aussieaussiepb@gmail.com>]  
Sent: Friday, June 07, 2019 8:09 AM  
To: Councilmember Mark Kersey <[MarkKersey@saniego.gov](mailto:MarkKersey@saniego.gov)>  
Cc: [aussieaussiepb@gmail.com](mailto:aussieaussiepb@gmail.com); Lindsay, Carrie <[CLindsay@saniego.gov](mailto:CLindsay@saniego.gov)>  
Subject: Noise wall Sabre Springs Road to Camel Mountain Road

Hi Council member Kersey and Ms. Lindsay,

I255-9      Comment noted.

I255-9

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Comment Letter I256

**From:** Prashant Khade <prashantkhade@gmail.com>  
**Sent:** Monday, February 8, 2021 10:26 AM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Dear Sir,

We live in Carmel Mountain. We have been hearing about the housing development projects in our area. We are worried about the traffic, parking spaces, HW-56 traffic and noise level which will add more stress on present families. This area is already congested due to population and traffic. Adding another 5-6k population and 2-4k cars will really affect the accessibility of the area.

Regards,  
 Prashant Khade  
 12110 Via Milano, San Diego, CA 92128.

I256-1

**Response to Comment Letter I256**

**256 Prashant Khade  
 February 8, 2021**

**I256-1**

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking. Specific to traffic along I-15 and SR-56, the City's Transportation Study Manual (City of San Diego 2020) established study requirements for transportation analysis in the City. The Transportation Study Manual does not require the analysis of freeway segments in the Local Mobility Analysis.

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise Impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. The comment addresses subject areas, which received extensive analysis in the Draft EIR. The comment addresses subject areas, which received analysis in the Draft EIR.



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Comment Letter I257

From: Mukherjee Poribar <mukherjee.poribar@gmail.com>  
Sent: Monday, February 8, 2021 12:40 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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We are homeowners next to the proposed project. The specifics of the proposed project concern us and we would like to request the city to consider our perspectives:

- The architecture plan doesn't have enough buffers and will make the whole area cramped up. Building houses is one thing but really surprised that the city is even considering this type of density!
- The road infrastructure won't be adequate for a project of this volume. Shouldn't the city first lay out that infrastructure and then consider such a project?
- We were astonished to learn that multi-story buildings are being proposed. Can we please take into consideration what is around? Why this sudden deviation from course
- We are also very concerned of safety...the plans are inadequate in several areas from wildfire to cycling lanes

Please reconsider the plans and ask for something that is in line with the community style, decorum and its people. San Diego is not LA and CMR doesn't wish to become a downtown. Had we wished to live in a densely populated neighbourhood with traffic jams on every street, we would not have come to CRM.

If you want to carry forward with a plan like this, at least allow 5-10 years for community residents to plan (and if required move out!)

Thanks,  
Pri and Rick Mukherjee  
12047 World Trade Dr

I I257-1  
I I257-2  
I I257-3  
I I257-4  
I I257-5  
I I257-6

Response to Comment Letter I257  
257 Pri and Rick Mukherjee  
February 7, 2021

- I257-1The comment is an introduction to comments which follow.
- I257-2Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**.
- I257-3Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information. The General Plan Circulation Element roadways in Carmel Mountain Ranch have already been built to their ultimate classifications within the study area. However, improvements to alleviate project effects to traffic operations were identified per the City of San Diego’s Local Mobility Analysis guidelines. Right-turn overlap phasing will be implemented at the Carmel Mountain Road/Rancho Carmel Drive intersection, Ted Williams Parkway/Pomerado Road intersection, and Carmel Mountain Road/Camino Del Norte intersection. A traffic signal will be installed at the Carmel Ridge Road/Ted Williams Parkway intersection to reduce delay, allow for movements in all directions, and reduce excessive queues at the Ted Williams Parkway/Shoal Creek Drive intersection.

- I257-4** Refer to **Response to Comment I257 2**.
- I257-5** Wildfire hazards are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**.
- Related to bicycle facilities, please refer to Section 5.2, Transportation/Circulation – specifically pages 5.2-5/6 and 5.1-20/11. Additionally, Section 13 of the Local Mobility Analysis (Draft EIR Appendix C) identifies which intersections where the project adds the most traffic are more likely to experience safety issues, based on Appendix C of the City's Systemic Safety the Data-Driven Path to Vision Zero and a hotspot map provided by the City. The Local Mobility Analysis lists measures that could be implemented at these intersections to improve pedestrian and bicycle safety. The comment addresses subject areas, which received analysis in the Draft EIR.
- I257-6** Refer to **Response to Comment I257-2** regarding community character. Refer to **Master Response 10** regarding alternatives.

Comment Letter I258

From: Ram Chintala <ramchintala@gmail.com>  
Sent: Monday, February 8, 2021 9:14 AM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Name and address:

Ram Chintala  
11883 Wilmington Rd, San Diego, CA 92128

**I strongly Oppose the construction of 1,200 residential units:**  
By Adding 1,200 Homes will add traffic and pollution to this neighborhood. It also increases Security issues to this community.

Loss of Open Space: We will lose open space, since most of the families bought homes here because of the open space and natural beauty.

**Alternative to consider:**

- 1. Convert Golf Course to Vineyard or an orange orchard.
- 2. Construct single family 1 floor homes with 1Acre lots.

Thanks  
-Ram chintala

Response to Comment Letter I258  
258 Ram Chintala  
February 8, 2021

- I258-1  
Traffic is discussed in Section 5.2, Transportation/  
Circulation, of the Draft EIR. Transportation/  
circulation impacts were determined to be significant  
and unavoidable. Refer to **Master Response 3**.  
  
Regarding pollution, pollution-related topics include  
air quality, discussed in Section 5.3, Air Quality  
and Odor; greenhouse gas emissions, discussed in  
Section 5.7, Greenhouse Gas Emissions; water quality,  
discussed in Section 5.18, Water Quality; health and  
safety, discussed in Section 5.8, Health and Safety; and  
wildfire, discussed in Section 5.19, Wildfire, of the Draft  
EIR. All impacts associated with these environmental  
topics were determined to be less than significant.  
The comment addresses subject areas, which received  
analysis in the Draft EIR.
- I258-2  
Pursuant to CEQA Guidelines §15064(e), the EIR  
need not address economic or social changes unless  
the change would result in a significant physical  
environmental impact. Security is not a physical  
change to the environment. Refer to **Response to  
Comment 02-7** regarding public safety.
- I258-3  
Refer to **Response to Comment 02-11a** regarding  
open space.
- I258-4  
Refer to **Master Response 10** regarding alternatives.
- I258-5  
Comment noted.

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Comment Letter I259

**From:** Ramakrishna Popuri <rama.popuri@gmail.com>  
**Sent:** Saturday, February 6, 2021 12:47 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Ramakrishna Popuri <rama.popuri@gmail.com>  
**Subject:** [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Sir

This is regarding the Carmel Mountain  
 Project Name -The Trails at Carmel Mountain Ranch  
 Project Number 652519  
 SCH No. 2020039006

As a Carmel Mountain Ranch Neighbour, we have few Concerns with this new construction

1. Traffic will be heavy, it will be a problem for the existing homeowners commute
2. This new construction will impact school traffic
3. School - Students in each class room will increase, and that will impact the Teachers-Student collaboration.
4. Already Carmel Mountain neighbourhood is full of traffic and congested streets, with the addition of these many new homes will impact heavy traffic
5. Carmel Mountain shopping complex will face parking problems
6. Other transient issues for our community

Thanks

I I259-1  
 I I259-2  
 I I259-3  
 I I259-4  
 I I259-5

**Response to Comment Letter I259**  
**259 Ramakrishna Popuri**  
**February 6, 2021**

- I259-1** The comment serves as an introduction to the comments which follow.
- I259-2** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The project will add vehicular traffic to the local community and may add traffic near local schools. Vehicle level of service and delay were analyzed per the requirements in the City's Transportation Study Manual and no specific issues were evaluated or identified related to school traffic. However, transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.
- I259-3** Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I259-4** Refer to **Response to Comment I259-2** and **Master Response 3** regarding traffic and parking.
- I259-5** Refer to **Master Response 3** regarding parking.

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Comment Letter I260

Response to Comment Letter I260

260 Rey and Lolita Soriano

February 8, 2021

-----Original Message-----

From: Reynan Soriano <reynan\_soriano@yahoo.com>

Sent: Sunday, February 7, 2021 4:44 PM

To: DSD EAS <DSDEAS@sanidiego.gov>

Cc: Troy@wealthanalytics.com

Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

To whom it may concern:

I am writing to show my concern for the Trails at Carmel Mountain Ranch Project, #652519/SCH No. 2020039006 as proposed. This project destroys the community character of Carmel Mountain Ranch and presents a number of unmitigable environmental impacts. I am especially concerned about the increased traffic in the area.

I have lived in Carmel Mountain Ranch on-and-off since 1987. The golf courses were inconspicuously tucked away behind houses. Unless you walked onto the course using one the narrow golf cart paths, you would hardly notice course. I cannot fathom building 1200+ new homes into the area that was once the golf course. Carmel Mountain Ranch Sabre Springs Community Council Chair Eric Edelman stated that these areas were simply not designed for more housing.

I ask that you reconsider developing abandoned retail or office space into housing. More and more are closing due to the pandemic and the infrastructure is already in place.

Alternatively I would ask you to reconsider the CMRSSCC's suggested alternative, which would see a smaller version of the proposed housing put on the golf course.

While I recognize the need for additional housing in our neighborhood, I believe a substantially downsized project or the no project alternative should be approved.

Sincerely yours,  
Rey and Lolita Soriano  
13844 Lewiston St.  
San Diego, CA 92128

Sent from my iPhone

I I260-1  
I I260-2  
I I260-3  
I I260-4  
I I260-5  
I I260-6

I260-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

With regard to the significant and unavoidable impacts of the project, the City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a)(3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project. The comment addresses subject areas, which received analysis in the Draft EIR.

I260-2

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I260-3

Refer to **Master Response 1** regarding density.



- I260-4** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.
- I260-5** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.
- I260-6** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

Comment Letter I261

From: Richard Kawa <richardkawa@yahoo.com>  
Sent: Monday, February 8, 2021 3:41 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch

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Project#652519/SCH No.2020039006  
As a resident of Carmel Mountain Ranch I strictly oppose along with my family the building of the Trails at Carmel Mountain Ranch. I urge all city members to take in consideration the residents that all ready live here and the environmental impact it would cause in a negative way.. the destruction of a beautiful community will never rest. Problems such as traffic and overpopulation in such a small area would also be a huge problem.. There are much better options to consider and would hope the city would explore these options instead of making a huge mistake.

Sincerely,  
Rick Kawa  
11372 Provencal Pl  
San Diego, Ca 92128

I261-1

Response to Comment Letter I261

261 Richard Kawa  
February 8, 2021

I261-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element. Refer to **Master Response 10** regarding alternatives. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I262

From: Rich Krejci <rkrejci@att.net>  
Sent: Monday, February 8, 2021 11:14 AM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Draft EIR Response

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Project Name – The Trails at Carmel Mountain Ranch,  
Project Number 652519 / SCH No. 2020039006

The development exacerbates an already bad wildfire evacuation situation.

Carmel Mountain Ranch is completely surrounded and partially within a Very High Fire Hazard Severity Zone. When our community was evacuated during the 2007 wildfires, the infrastructure at the time was already insufficient to support a large fire evacuation. Consequently, it took residents an hour and more just to reach the adjacent freeway, the I5, which was our primary evacuation route. Since then, the size and intensity of wildfires in California have been increasing – the 7 largest fires in California history occurred in the last 3 years – so the threat of a wildfire and evacuation is higher now than ever.

This development (again, completely surrounded and partially within a Very High Fire Hazard Severity Zone) adds 1,200 multi-family residential units and all of its corresponding traffic (7,928 daily trips according to this EIR), yet it does not include additional evacuation capacity to mitigate the increased population, traffic, and fire risk. Furthermore, fire risk assessments and mitigation steps to not adequately address the reality of a wildfire.

For example, Table 5.1-2 in the Draft EIR lists fire mitigation steps (e.g. brush management, using drought-tolerant plants, and building in compliance with applicable local, regional, state, and federal requirements related to fire safety); however, none of these steps are shown to lower the severity of our Very High Fire Hazard Severity Zone. A further study must be done to determine what must be done to lower our fire severity level, otherwise these mitigation steps are useless. Note that this study should include the surrounding community too – wildfires do not start and stop on this project's property line, and wildfire evacuations affect the entire community.

Table 5.1-2 mentions an evacuation plan, but none is offered. What is the evacuation plan and how does it address the increased capacity (1,200 multi-family residential units and 7,928 daily trips) on an already bad wildfire evacuation situation?

Section 5.2 concludes that the development has adequate fire evacuation routes due to it having six access points to adjacent public streets; however, this only addresses the evacuation of a building - it does not address evacuation of the entire community during a wildfire. There must be a study on the proposed development's negative impact on the evacuation of the entire community in which it will be built.

Section 5.8 and 5.19.3 lists our primary evacuation routes (I15 and SR56), but again the roads leading to our primary evacuation routes are already overloaded. This development will exacerbate the problem. What is needed is additional access to both I15 and SR56. This needs to be addressed in the EIR. Furthermore, Section 5.19.3 concludes that the development's impact on evacuation is not significant, yet it does not offer enough supporting evidence nor does it address the increased capacity. More supporting evidence is required to make that conclusion.

1

Response to Comment Letter I262

262 Rich Krejci  
February 8, 2021

- I262-1** Wildfire and evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I262-2** A FHSZ is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high). FHSZ maps evaluate wildfire hazards, which are physical conditions that create a likelihood that an area will burn over a 30- to 50-year period. They do not take into account modifications such as fuel reduction efforts (CAL FIRE 2020). As such, FHSZ severity cannot be reduced through site design. However, measures, such as brush management zones, can be implemented to reduce the risk of structure ignition and significant loss, injury, or death involving wildland fires. Wildfire impacts were determined to be less than significant in the Draft EIR. Refer to **Master Response 5**.
- I262-3** Refer to **Response to Comment I262-1** and **Master Response 5**.
- I262-4** Refer to **Response to Comment I262-1** and **Master Response 5**.
- I262-5** Refer to **Response to Comment I262-1** and **Master Response 5**.

Issue 2 on page 5.19 12 concludes that the project will not expose people or structures to significant risk of loss, injury, or death involving wildland fires. The evidence given does not support this conclusion – everyone in San Diego knows that trimming bushes and trees do not stop wildfires, so the EIR must either include steps that are proven to stop a wildfire or it must conclude that the project will expose people or structures to significant risk of loss, injury, or death involving wildland fires. In short, wildfire risk mitigation in this EIR must reflect the reality of the project being completely surrounded and partially within a Very High Fire Hazard Severity Zone.

Issue 2 also concludes that there is no *increased* impact due to the development, but the area is already at the highest risk level – nothing in the EIR is shown to lower the Very High Fire Hazard Severity Zone that partially covers and completely surrounds the community and the project area. Also, there is no evidence showing that evacuation routes have capacity to evacuate the entire community within a safe timeframe. Both of these areas need to be addressed in detail.

In summary, our community and this project are completely surrounded and partially within a Very High Fire Hazard Severity Zone; therefore, fire risk assessments and mitigation steps in the EIR must adequately address the reality of a wildfire. Furthermore, if mitigation steps cannot be shown to reduce the risk of being surrounded and within a Very High Fire Hazard Severity Zone, then the EIR must properly report the negative impact of the project on community evacuations and in exposing people and structures to significant risk of loss, injury, or death involving wildland fires.

Richard Krejci  
14005 Royal Melbourne Sq  
San Diego, CA, 92128  
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I262-6

I262-7

I262-8

**I262-6**

Refer to **Response to Comment I262-2**. To clarify, CEQA does not require that public agencies analyze the impact existing environmental conditions might have on a project's future users or residents (*California Building Industry Association v Bay Area Air Quality Management District*, (2015) 62 Cal.4<sup>th</sup> 369). Thus, an analysis of the environment's impact (wildfire) on the project is not required.

**I262-7**

Refer to **Response to Comment I262-2** and **Response to Comment I262-6**.

**I262-8**

Comment noted.

Comment Letter I263

From: Rob Jones <robjones619@san.rr.com>  
Sent: Monday, February 8, 2021 10:16 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project# 652519 Trails CMR/SCH 2020039006

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To Whom It May Concern:

As a 17 year resident and homeowner in the Carmel Mountain Ranch community ([11783 Windcrest Ln](#)) I wanted to voice my concerns and objection to the disastrous effects the above referenced project proposal would have on our community and my family. I have a 3 children including a 3 year-old son and two daughters (10 and 8). We are hoping they my son will attend Shoal Creek Elementary nearby as had been my hope for my children son since buying my home in 2004 in a community that, while already very busy and populated, my family and I have loved for many years. Due to increased population and apartment housing packed into our area we have already had to deal with significant traffic in our area and have had to be re-zoned for voting poll stations as well as future middle school zoning to locations further away. As it happens, I live on a wide street (Windcrest Lane) that I believe was designed for easy emergency vehicle access and lends itself to problems with speeding and traffic as a defacto shortcut between Ted Williams parkway and Carmel Mountain road. It also happens to be a street with three existing large apartment home mega-complexes with entrances on the north end of the street. The proposal is designed to add two more mega complexes squeezed on two golf course fairways flanking Windcrest on both sides. I can not imagine the traffic and noise conjection this will create for our community and additional safety hazards it will create in the interest of unneeded housing for extreme profit. The impact on overcrowding of schools and resources will be equally terrible. I implore you to consider these factors and the overwhelming community opposition to this proposal. It is simply not safe and is a complete disregard to this planned community where many have been rooted and have raised families for so long. I would greatly appreciate any support in rejecting this housing proposal or to change the longstanding community plan.

Thank you,

Rob Jones.

Sent from my iPhone

Response to Comment Letter I263

263 Rob Jones  
February 8, 2021

- I263-1
- The City acknowledges the comment and notes it expresses general project opposition and provides an introduction to the comments that follow.
- I263-2
- Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. The comment identifies concerns related to project traffic being added to Windcrest Lane. Level of service and congestion or capacity-based measures of effectiveness are not considered as impact criteria for CEQA purposes. Therefore, are not considered in the transportation/circulation impact analysis and no CEQA mitigation is required associated with project traffic being added to Windcrest Lane. The Local Mobility Analysis performed for the project did evaluate the addition of project traffic to Windcrest Lane and found that the roadway has adequate capacity to accommodate the project traffic under opening year and 2050 conditions. transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.  
  
Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Refer to **Response to Comment 02-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

- I263-3** Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Comment Letter I264

From: robert clark <1rcclark@att.net>  
Sent: Monday, February 8, 2021 4:34 PM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Subject: [EXTERNAL]

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello my name is Robert Clark and have been a resident of Carmel Mountain Ranch for 32 years. I'm deeply saddened but not surprised that our elected officials would engage again in building homes on any inch of real estate in our beautiful city. The elementary, middle and high schools are tapped out for any new students. If the city council has ever taken any time to inquire they would be astounded to know the schools don't need anymore new students. I'm sure they know but don't care. Are there plans to build new schools to accommodate the new influx of students? The answer is no. Lets touch on law enforcement for a moment. I served for the San Diego Police Department for 25 years. For 15 years at the Northeastern Division. I know first hand about staffing shortages. If the citizens would get the truth from their elected officials they would be horrified by the lack of staffing that is actually out there on any given shift. I know for a fact five officers routinely go out on the third shift (2100-0700) of an area from Miramar Rd on the south and north to the Wild Animal Park. How would people sleep at night knowing this. Fire stations have their hands full to so we definitely don't need anymore housing in Carmel Mountain. The roads look terrible and more wear and tear is not needed. I would welcome to address these concerns to anyone at any time. Sincerely, Robert Clark a concerned resident.

I264-1  
I264-2  
I264-3  
I264-4

Response to Comment Letter I264  
264 Robert Clark  
February 8, 2021

- I264-1** The City acknowledges the comment letter, and notes it provides an introduction to the comments that follow.
- I264-2** Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I264-3** Police and fire protection services are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police and fire protection services were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.
- I264-4** Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.



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Comment Letter I265

**From:** Robert Mallory <mallory.robert@gmail.com>  
**Sent:** Saturday, February 6, 2021 7:45 PM  
**To:** DSD EAS <DSDEAS@sandiego.gov>  
**Subject:** [EXTERNAL] Project Name: Trails at Carmel Mountain Ranch, Project No. 652519 / SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

E. Shearer-Nguyen  
 Environmental Planner  
 City of San Diego Development Services Center  
 1222 1st Avenue, MS 501  
 San Diego, CA 92101  
 DSDEAS@sandiego.gov

February 6, 2021

13971 Royal Melbourne Square  
 San Diego, CA 92128  
 858.613.9043  
 mallory.robert@gmail.com

**Subject:** Project Name: Trails at Carmel Mountain Ranch, Project No. 652519 / SCH No. 2020039006,  
 Community Plan Area: Carmel Mountain Ranch, Council District: 5

Hello E. Shearer-Nguyen,

The following issues and concerns discovered during our review of the proposed project. Please review our comments herein as part of your EIR draft review process.

1. Notice of Availability, page 2. Listing of Assessor Parcel Number (APN) found as erroneous, one APN has no record found, one APN is for a residential property, and one APN listed with a duplicate.  
 Source: <https://sdgis.sandag.org>
2. EIR, page 1. Listing of Assessor Parcel Number (APN) found as erroneous, one APN has no record found, one APN is for a residential property, and one APN listed with a duplicate.  
 Source: <https://sdgis.sandag.org>
3. Issue with golf course property APN's 3136902500, 3136902600 and 3130408500 not included on purchase agreement between property owner PACS Enterprises, LLC (Optionor) and developer NUWI CMR, LLC (Optionee).  
 Source: Memorandum of Purchase Option recorded August 21, 2019 by San Diego County Recorder, Ernest J. Dronenburg, Jr., Official Records, Source: DOC# 2019-0355587, and DOC# 2019-0355625, signed and dated June 21, 2019. Note: these APN's are found in the project proposal, but these APN's were not agreed between both parties for purchase agreement.
4. Multiple issues found in Executive Summary, page 3. ER.4 Project Description. Summary found with land usage for proposed zone change to CC-2-1. San Diego Municipal Code Chapter 13 states the uses proposed by developer are not permitted in commercial zones.

1

I265-1

I265-2

## Response to Comment Letter I265

265 Robert Mallory

February 6, 2021

### I265-1

The City acknowledges the comment and notes it provides background information and states that there are issues with regard to the APNs for the project site.

### I265-2

The Final EIR has been revised to clarify that the caretaker unit is considered watchkeeper quarters, which is allowed in the CC-2-1 zone per San Diego Municipal Code Section 131.0522, Table 131-05B.

### I265-3

To clarify, the City prepared the Draft EIR; the developer did not prepare the document. Moreover, as explained in Section 5.1, Land Use, of the Draft EIR, "The proposed project would not construct structures that have the potential to physically divide an established community (such as large roadways, extension of physical barriers)." Further, "[t]he golf course, which is private property, was not available for public use during previous operation and is currently fenced preventing public access. The proposed project would include approximately 5 miles of publicly accessible trails that would provide increased connections between the proposed project and the surrounding community." Although the project is surrounded by an existing community, infill development does not inherently result in the division of an established community. As a result, the Draft EIR determined that impacts would be less than significant and the comment does not provide information to the contrary. The comment addresses a subject area, which received analysis in the Draft EIR.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                 |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><i>"In addition, the project proposes a 12,000-square-foot pad for future development of a community art gallery/studio located near the existing Carmel Mountain Ranch library. This gallery may include up to 6,000 square feet in one or two buildings to house gallery space, studio space with an indoor kiln, and a bathroom/kitchen. In addition, this amenity could include an up-to-2,000-square-foot outdoor open shed structure to house a wood-burning ceramic kiln, wood storage, and a washing area. A 3,000-square-foot café/restaurant/banquet area is proposed with 2,000 square feet of dining space and a 1,000-square-foot kitchen. On additional caretaker unit up to 1,200 square feet would also be proposed. This Community Plan Land Use proposed is Community Commercial and the zone would be CC-2-1."</i></p> <p>Source: <a href="https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division05.pdf">https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division05.pdf</a> San Diego Municipal Code Chapter 13: Zones (1-2021) §131.0522 Use Regulations Table for Commercial Zones. The uses allowed in the commercial zones are shown in Table 131-05B.</p> | I265-2<br>Cont. | <b>I265-4</b> | Refer to <b>Response to Comment I265-3</b> . To clarify, the project would establish an independent HOA, separate from any existing HOAs. Implementation of a new HOA would not physically divide the established community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>5. Misinformation from developer. Impact Analysis, Issue 4: Would the project physically divide an established community? Yes, it will, truthfully the developers answer to impact study issue 4 is misleading. Actually, the proposed project is significant as it will physically divide the established master planned community boundaries and borders.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | I265-3          | <b>I265-5</b> | Refer to <b>Response to Comment I265-3</b> and <b>Response to Comment I265-4</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>Source: Carmel Mountain Ranch RCA. The home owners association is presently comprised of 5070 total units. CMR RCA currently has fifteen (15) Districts with 2024 single family units, or 40% of total; ten (10) Sub-Associations with 1784 single family units, or 35% of total; and four (4) Apartment Houses with 1262 multiple family units, or 25% of total.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                 | <b>I265-6</b> | The long-term maintenance and preservation of open space resources on the project site would be the responsibility of a new Master HOA. The HOA would also be required to contract with qualified professionals for the long-term care and maintenance of the bioretention basins and brush management zones.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <p>6. Misinformation from developer. Issues with project proposing to create boundaries inside existing homeowners association borders, this property line boundary will physically divide the community and legally divide the existing master planned community's home owners association.</p> <p>Source: Impact Threshold(s). According to the City's Significance Determination Thresholds (2016a), land use impacts may be significant if a project would physically divide an established community.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | I265-4          |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>7. Major Issue. 3.3 Project Components, page 3-9. Issue with newly developed units not being included in the master planned community's home owners association. Newly developed units will create a new home owners association separately. Allowing new units to be built will divide community geographically, physically and legally.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | I265-5          |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>8. Major Issue. Concerns with long-term maintenance and preservation of open space resources on the project site including the trail system would be the responsibility of a new Master HOA.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                 | <b>I265-7</b> | The commenter is correct in that the project would not include approximately 164.38 acres of open space, recreation, and trails amenities. The project would include approximately 111 acres of open space, recreation, and trails amenities. The entire project site is approximately 164.5 acres. Section 5.17, Visual Effects/Neighborhood Character, has been updated in <del>strikeout</del> / <u>underline</u> to reflect this change in the Final EIR. Section 15088.5 of the CEQA Guidelines provides the regulatory framework for when an EIR must be recirculated prior to certification. The Draft EIR need not be recirculated because no new significant information has been presented and added to the Draft EIR as a result of the public review period, such as a new significant environmental impacts or mitigation measures. The revisions to the Draft EIR included in the Final EIR provide a correction that does |
| <p><i>"The proposed project would be developed in phases, over an estimated four year period (see Figure 3-3, Project Phasing). Maintenance and operation of the individual projects would be financed through homeowner's associations (HOAs) and owners of multi-family developments that would be responsible for all private roads, private utilities, and common amenities. The long-term maintenance and preservation of open space resources on the project site including the trail system would be the responsibility of a new Master HOA. The HOA would also be required to contract with qualified professionals for the long-term care and maintenance of the bio retention basins and fuel modification zones. Detention and water quality treatment facilities will be provided within all areas of proposed development in accordance with the requirements of the SDMC and San Diego Regional Water Quality Control Board MS4 permit. The HOA would also be responsible for enforcement of the project's Covenants, Conditions, and Restrictions."</i></p>                                                                                                                                         | I265-6          |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

9. Misinformation from developer. 5.17 – Visual Effect/Neighborhood Character. Community Landmark, page 5.17-17. Major issues, the developers comment here are false, the project will not introduce approximately 164.38 acres of open space, recreation, and trail amenities at the project site. Major issues with demolition of existing golf course club house. Multiple issues with golf course property owner found to be in violation of city municipal code, zoning investigators have cited property owner with multiple code enforcement violations, such as non compliance of brush management, weed abatement, and removal of fire hazard debris on the golf course. These issues remain open as an ongoing, active investigation by City Code Enforcement staff.

*“No specific community identification symbols or landmarks identified in the General Plan or Carmel Mountain Ranch Community Plan are present at the project site (City of San Diego 2008, 1999). The Carmel Mountain Ranch Community Plan identifies the existing golf course on site as a visual recreational amenity for the community, as well as an attractive separation between the various residential neighborhoods. However, the majority of the golf course is currently gated and unmaintained. As a result, the golf course supports weedy and overgrown vegetation (see Figures 5.17-3 and 5.17-4, which illustrate the existing visual character of the project site). The project would introduce approximately 164.38 acres of open space, recreation, and trail amenities at the project site, providing improved visual recreational amenities compared to the unmaintained, inactive, and inaccessible golf course. As the former golf course has not been identified as a community identification symbol or landmark, the project would not result in the physical loss, isolation, or degradation of a community identification symbol or landmark that is identified in the General Plan, applicable community plan, or local coastal program.”*

10. Issue with Zoning. Appendix T - Vested Tentative Map, page 7 of 62, small font highlights an irrevocable offer to dedicate (IOD), Unit 7 Lot 1-Park property deed to city. How many more Units are being considered for an irrevocable offer to dedicate? Will these Units become deeded as city property and added to the City of San Diego's Parks and Recreation Department?

Respectfully,

Robert and Jane Mallory

Robert Mallory  
858.335.0872  
[mallory.robert@gmail.com](mailto:mallory.robert@gmail.com)

I265-7

I265-8

I265-8

not affect the analysis contained within the Draft EIR. Thus, recirculation is not required. Additionally, refer to **Master Response 2** regarding aesthetics impacts.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Historic maintenance of the project site is not a physical change to the environment.

Comment noted. The comment does not raise an issue that relates to a physical effect on the environment. No further response is required because the comment does not raise an environmental issue.

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Comment Letter I266

Response to Comment Letter I266

266 Robert Ray  
February 8, 2021

-----Original Message-----

From: Bob Ray <robertray123@icloud.com>  
Sent: Monday, February 8, 2021 5:14 PM  
To: DSD EAS <DSDEAS@saniego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch

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So much for moving to a master planned community!! How can this happen in a city approved development?? What's the point then. This "plan" will ruin the quality of life, creating huge traffic issues and damage property values forever. We would not have bought here if we would have known that the city could change the Master Plan that they approved.  
Bob & Candy Ray  
11609 Boulton Ave.

Sent from my iPhone

I266-1

I266-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values and quality of life are not physical changes to the environment.

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Comment Letter I267

**From:** Roger McWilliams <roger.mcwilliams@gmail.com>  
**Sent:** Monday, February 8, 2021 2:31 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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I vehemently oppose the development of this plan. This area is already too congested. The traffic will increase dramatically. Esprit Avenue which is the main thoroughfare in and out of this community will become a super highway. This will become very dangerous for children and all current residents. This lower income proposed project will invariably decrease current homeowners property values. 60% of these 1200 units are going to be rental property. I fear that will increase crime in this community. Having two different homeowners associations, one for the existing homes and one for the proposed 1200 condos will cause a serious conflict of interest because of different CC and Rs. I moved here in 1992 and did not ever envision this proposed project from happening.

I sincerely hope this lower income housing is not approved.

Thank you for your consideration,

Roger McWilliams  
 13841 Esprit Ave, San Diego, CA 92128

I267-1

I267-2

**Response to Comment Letter I267**

**267 Roger McWilliams**

**February 8, 2021**

**I267-1**

Traffic, including transportation hazards, is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

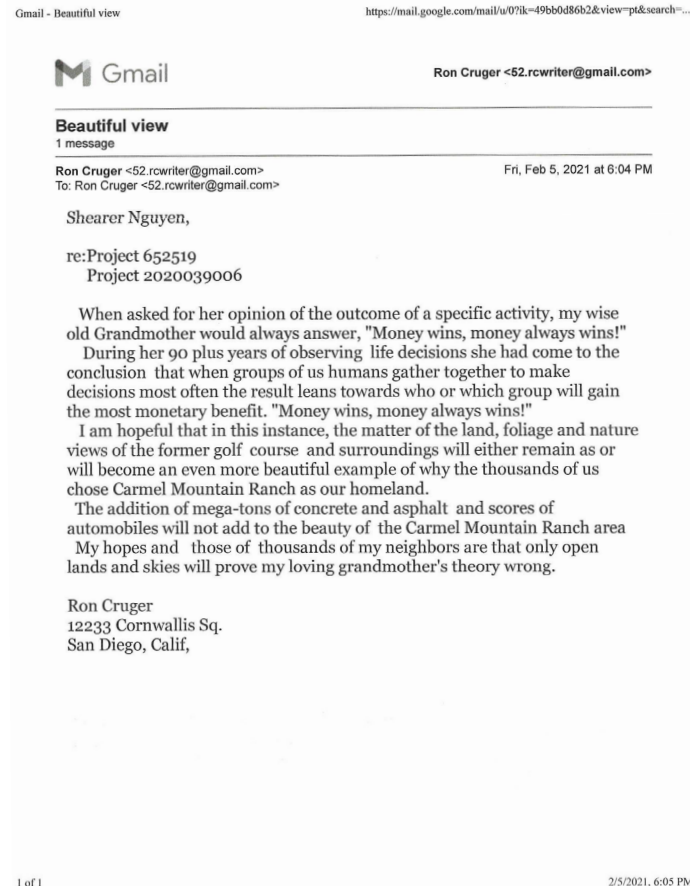
**I267-2**

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment.



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Comment Letter I268



I268-1

Response to Comment Letter I268

268 Ron Cruger  
February 5, 2021

I268-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I269

From: Saeed Sharifi Tehrani <sharifitehrani@yahoo.com>  
Sent: Sunday, February 7, 2021 8:38 PM  
To: DSD EAS <DSDEAS@sanidgo.gov>  
Subject: [EXTERNAL] Comments Regarding Project Name : The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Project Name: The Trails at Carmel Mountain Ranch  
Project Number 652519/SCH No. 2020039006

Dear Sir/Madam,

I have been a home owner and a resident in Carmel Mountain Ranch (CMR) since 2013. I'm writing this letter to provide my comments regarding the above referenced project and its EIR document:

- **Project Alternatives:** The project targets 1200 new units. It is not clear and not justified why EIR document only considers 825 Units as an alternative and does not study lower unit count alternatives:
  - Please note that even with the estimation of ~2.65 persons per unit (which is low and seems somewhat unrealistic) both 1200 and 825 units options result in more than +3180 and +2186 increase in population respectively. Both of them significantly increase the population of CMR.
  - Before Covid, I used to witness everyday heavy traffic in CMR around schools and entrances to highways. Such a 1200 or 825 unit project intensifies the pressure on schools in our area, on already-congested CMR's routes, parking spaces, public services, etc.
  - The above gives the impression that EIR document is indented to consider only "high-density" options. EIR document should include a much lower unit count options (for example, 200 to 400 unit counts).
- **Evacuation Analysis:** Vast spread of fire by high-speed winds is a real environmental danger in south California. It has happened in south California and it will happen again. In such cases, mass evacuation is a reality:
  - It is very concerning that (fire) evacuation analysis provided in the EIR document ignores the accumulated effects of evacuating neighbor communities.
  - The impact of +3180 increase in population should be clearly evaluated. Historical fire evacuation data should be incorporated in such evaluation. Safety should be number 1 priority in EIR document.

Regards,  
Saeed Sharifi, Ph.D.

Response to Comment Letter I269

269 Saeed Sharifi  
February 7, 2021

**I269-1** The City acknowledges the comment and notes it provides an introduction to the comments that follow.

**I269-2** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis. Additionally, as explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

**I269-3** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking.

Public services and facilities, including schools, were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. As explained therein, public services and facilities impacts were determined to be significant and unavoidable due to the impact on library facilities. Impacts to all other public services and facilities were determined to be less than significant. Refer to **Master Response 6** regarding schools and libraries.

**I269-4** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

**I269-5** Emergency evacuation is discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Emergency evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

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Comment Letter I270

**From:** Sapna Mehta <sapnam.2008@gmail.com>  
**Sent:** Sunday, February 7, 2021 9:33 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch, Project # 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Sir/Madam,

I am writing to you today regarding my concerns on the planned project at Carmel Mountain Ranch (CMR) listed in the subject line!

1. Environmental impact - Loss of Green Space

There are very few parks in CMR and most of them are fairly small or located very near the freeway. Having the golf course provided a lot of additional green space and quiet to CMR. It was better for the bird and wild animal life as well as providing a serene atmosphere for the residents while taking their daily walks. Taking away this green space for more housing development is very concerning. It will add to pollution and increase greenhouse impact.

2. Traffic, Noise, Emergency access, additional burden on existing facilities

I live near Highland Ranch Elementary School close to the golf course/planned project in CMR. It often takes me over 30 minutes frequently to get to the main road because of school traffic early in the morning. The planned project will increase school traffic considerably as well as traffic in the community and shopping center. It will also considerably increase the number of children using the school, bus and library placing a huge burden on existing facilities and worsening the existing resident's experience. As it is, the road (waverly downs way) is always full of potholes due to the existing school traffic and this will worsen. It is also hard for emergency and fire vehicles to reach my house in an emergency when there is school traffic and this will be the case for other residents as well. The background noise (traffic and general) will also increase with the increased population.

Therefore, I strongly recommend against approval of this project given my concerns listed above which I am sure are also shared by other CMR residents.

Regards,

Sapna Mehta  
 14892 Waverly Downs Way,  
 San Diego, CA 92128

Response to Comment Letter I270

270 Sapna Mehta  
 February 7, 2021

I270-1

The City acknowledges the comment and notes it provides an introduction to the comments that follow.

I270-2

Refer to **Response to Comment 02-11a** regarding open space. Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated.

Greenhouse gas emissions, which are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR were determined to be less than significant. Refer to **Master Response 8**. Regarding pollution, pollution-related topics include air quality, discussed in Section 5.3, Air Quality and Odor; greenhouse gas emissions, discussed in Section 5.7, Greenhouse Gas Emissions; water quality, discussed in Section 5.18, Water Quality; health and safety, discussed in Section 5.8, Health and Safety; and wildfire, discussed in Section 5.19, Wildfire, of the Draft EIR. All impacts associated with these environmental topics were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

**I270-3** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Public services and facilities, including schools, library, police and fire services, were all addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to public services and facilities were determined to be significant and unavoidable due to the impact on library facilities. Impacts to all other public services and facilities were determined to be less than significant. Refer to **Master Response 6** regarding schools and libraries. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I271

From: Scott Leslie [Home] <scottleslie@san.rr.com>  
Sent: Monday, February 8, 2021 9:39 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

I write this letter with concern about the proposed density of this development. There are too many units planned for the area. This added population will stress education and emergency services and subsequently devalue quality of living in the area. Please consider this in your evaluation of the EIR.

Sincerely,

Scott Leslie  
11675 Castile Way  
San Diego, CA 92128

I271-1

Response to Comment Letter I271  
271 Scott Leslie  
February 8, 2021

I271-1

Refer to **Master Response 1** regarding density. Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Fire and police services were also addressed in Section 5.14, Public Services and Facilities. Impacts to fire and police services and facilities were determined to be less than significant.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Quality of life is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.



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Comment Letter I272

Response to Comment Letter I272  
272 Shalendra Maharaj  
February 8, 2021

From: Slim Man <slimman2837@gmail.com>  
Sent: Monday, February 8, 2021 11:13 AM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] In support of The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,  
I fully support the development of The Trails at Carmel Mountain Ranch. The need for more housing is dire in San Diego and I am not sure what the homeowners expected to happen to an abandoned golf course that is located within 2 miles of 1 of the 2 main freeways of San Diego county. Higher density housing is needed close to freeways so that the county does not turn into areas like Los Angeles and Orange County. The land will be developed and I am not sure why my HOA is so adamant on delaying the inevitable. Based on what I have heard from my HOA, the things they suggest are not feasible for any developer to ever build on that land and I do not agree with most of their concerns about this development.

Thank you for your time

-Shalendra Maharaj

I272-1      Comment noted.

I272-1

Comment Letter I273

From: Pat Lowell <plowellsm@gmail.com>  
Sent: Monday, February 8, 2021 4:19 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at CarmelMountainRanch Project Number 652519/SCH No.2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

TO WHOM IT MAY CONCERN:

I have lived in the Carmel Mountain Ranch community for 30 years. In my opinion this proposed project, known as The Trails at Carmel Mountain Ranch, will result in eliminating community character, loss of open space and parkland, increased wildfire risk, increased evacuation risk, and creation of more sprawl housing.

ELIMINATING COMMUNITY CHARACTER

I purchased my home under the assumption that open space and green space would be a prominent feature of the community. I had good reason to believe that green space would characterize the community since, the project site had been designated Park, Open Space, and Recreation in the General Plan.

I have voiced opposing opinions to our San Diego City Council. I believe construction of 1200 condos, apartments, and town houses is inconsistent with the community character of CMR. The vast majority of structures in CMR are single family homes. The newly proposed project consists entirely of town houses, three and four story apartment buildings, and condos, which are inconsistent with the community and eliminate the visual character of CMR.

LOSS of OPEN SPACE and PARK LAND

-EIR states The Project will provide 112 acres of open space and parkland. Contrary to that projection, there would be the reduction of 52 acres of open space.  
- the city of SanDiego climate action plan establishes the protection of open space as an important goal  
- Senate bill 385 requires that California preserve open space and not build large housing projects on open space and parkland

INCREASED WILDFIRE RISK

- Carmel Mountain Ranch is in a State-designated Very High Fire Severity Zone  
- numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature  
- the EIR acknowledges the Project is in a Very High Hazard Severity Zone

INCREASED EVACUATION RISK

Evacuation from CMR in the event of a wildfire will be extremely difficult especially with the proposed additional 1200 homes and more than 3500 residents. This will make an already dangerous situation even worse.

Freeway exits in the area of Routes 15 and 56 would be swamped by residents fleeing other large communities to the north and east including Poway, Rancho Bernardo, Ramona, Escondido and others.

Thank you for your thoughtful consideration.

Sincerely,  
Patricia A. Lowell  
14067 Carmel Ridge Road  
San Diego, CA 92128

Response to Comment Letter I273  
273 Patricia Lowell  
February 8, 2021

I273-1

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Response to Comment 02-11a** regarding parks and open space.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Population and housing growth are discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project’s potential impact on population and housing growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan’s Housing Element. The comment addresses subject areas, which received analysis in the Draft EIR.

I273-2

Refer to **Response to Comment I273-1**.

- I273-3** Refer to **Response to Comment 02-11a** regarding parks and open space. Greenhouse gas emissions impacts were determined to be less than significant in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Refer to **Master Response 8**.
- I273-4** Refer to **Response to Comment I273-1**.
- I273-5** Refer to **Response to Comment I273-1**.

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Comment Letter I274

Response to Comment Letter I274

274 Resident  
February 6, 2021

From: Research Assistant <research.nowarta@yahoo.com>  
Sent: Saturday, February 6, 2021 8:05 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

Dear Mom/Sir,  
We are very concerned about the environmental effects this project will have in our community. Please consider the infrastructure of the Carmel mountain ranch while approving their permit. They are planning to build 1200 units and this area has absolutely no room for a huge project like this.  
Regards

Sent from my iPhone

I274-1

Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3**.

I274-1

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Comment Letter I275

From: srini ari <srari@hotmail.com>  
Sent: Sunday, February 7, 2021 8:43 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and City council,  
I, Srinivasa Ari, am strongly against the proposed Trails at Carmel Mountain Ranch project in its current form.

Environmental Effects:

The proposed project will be detrimental to the quality of life to the current residents in Carmel Mountain Ranch. This project will increase the dangerous and toxic gases emitted from the cars, houses, and other appliances contributing to the growing greenhouse gases. The current plan is to create 1,200 condominiums, town homes, and apartments which will increase traffic and leading to more accidents and deaths in the community. With the addition of 1,200 housing the littering and pollution will escalate destroying the community. This also will be problematic in cases of fires and evacuation scenarios. If we had to evacuate due to a fire, many people may not be able to do it in time due to traffic. This is a likely scenario because Carmel Mountain Ranch is in a state-designated very high fire severity zone.

Social Effects:

With the increase of 1,200 condominiums there will be nearly 4 times as many people coming into the community. The level of crime would increase, and traffic would be a never-ending problem. Before Covid-19 my commute to work would be a problem with school's traffic, and with the current plan it's bound to get worse. Another problem is that my family and many others will lose their privacy with these three-four story apartments and townhomes. These buildings will tower over my backyard and many people will be able to see whatever we are doing. Also, when I bought my home the golf course and view was a contributing factor. The value of my home will decrease with the current plan. I am against the current plan, but I believe if the condominium, townhomes and apartments were changed to single family homes I would be more open to the plan.

Education:

At present more than 800 children are studying in Highland Ranch Elementary School. In 2010 the student and teacher ratio 1:25 and now 1:35. Already the teachers are **overwhelmed**. Please consider all the environmental, social and education issues and change the current proposed plan.

Let me know if you have questions

Thanks  
Srinivasa Ari  
12223 Eastbourne Road  
San Diego, CA, 92128

1

Response to Comment Letter I275

275 Srinivasa Ari

February 7, 2021

I275-1

Comment noted.

I275-2

Greenhouse gas emissions was addressed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality was addressed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality and greenhouse gas impacts were determined to be less than significant. Refer to **Master Response 7** regarding air quality and **Master Response 8** regarding greenhouse gas emissions.

Traffic, including traffic safety, is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Regarding general pollution, pollution-related topics include air quality, discussed in Section 5.3, Air Quality and Odor; greenhouse gas emissions, discussed in Section 5.7, Greenhouse Gas Emissions; water quality, discussed in Section 5.18, Water Quality; health and safety, discussed in Section 5.8, Health and Safety; and wildfire, discussed in Section 5.19, Wildfire, of the Draft EIR. All impacts associated with these environmental



topics were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

**I275-3** Refer to **Response to Comment I275-2** regarding traffic. Refer to **Master Response 2** regarding private views. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime and privacy are not physical changes to the environment. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.

**I275-4** School capacity is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Comment Letter I276

**From:** Stacy MacDonald <stacymac28@gmail.com>  
**Sent:** Friday, February 5, 2021 9:54 AM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Trails at Carmel Mountain Ranch, Project no 652519/SCH no 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

My name is Stacy MacDonald  
 13966 Royal Melbourne Sq  
 San Diego, CA 92128

I would like to voice my concern regarding this proposed project. The project is not respectful of the existing community as it infills the former golf fairways spread throughout the community. The reason I purchased my house in CRM is because of the beauty of the community. The golf fairways contributed to the beauty. If those fairways are filled in as proposed, it will change the whole look of the community and there will not be the openness that attracted me to this community. The proposed plan has 3-4 story tall buildings, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing home. This is not the beauty I was looking for when I bought my house.

Additionally I am concerned about the overcrowding that this proposed project would bring. This community is crowded already, and adding more residents to the area will deplete resources (water) and lead to crowding in egress if there is a major event such as a fire or earthquake. The current roads will not be able to accommodate so many extra residents, specifically if there is a major event.

I urge you to please consider some of these points.

Kind regards,  
 Stacy MacDonald

I276-1

I276-2

Response to Comment Letter I276

276 Stacey McDonald

February 5, 2021

I276-1

Impacts to visual quality and character are assessed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

I276-2

Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element.

The project's impact on water supply issues was addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. The analysis determined the project would result in a less than significant water supply impact.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I277

From: Steve Nolan <drstevenolan@yahoo.com>  
 Sent: Monday, February 8, 2021 8:28 PM  
 To: DSD EAS <DSEAS@sanidiego.gov>; troy@wealthanalytics.com  
 Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch EIR, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

This objection letter is in reference to The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

SDPC,

Are you going to rubber stamp yet another high density housing development in the City of San Diego? Your approval of the Alante project and every other project in the area despite objections by the taxpayers and CPG's in this city shows what little regard you seem to have for the will of the people. I just want you to know that there will be serious political fallout for those who approve this development. Maybe not for you who sit on the commission and were not elected by the people. You are all pro development sycophants serving your developer masters. There should be a full audit of each and every one of your financial ties. We the people will make sure that any elected official who allows this to happen to our community will lose valuable votes that will jeopardize their political futures.

This project will destroy our community. How can you not see that?

\*More traffic.  
 \*More crime.  
 \*Stretched resources like water supply and class sizes.  
 \*Delayed fire egress endangering lives.

The environmental impact report shows 3,000 more daily trips and you don't consider that to be an impact on traffic? It is time for the citizens of this city to wake up and realize what irreversible damage you are doing by approving all construction projects for your corporate masters.

Dr. Steve Nolan

I277-1

I277-2

Response to Comment Letter I277

277 Steve Nolan  
 February 8, 2021

**I277-1** Comment noted.

**I277-2** Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

The project's impact on water supply issues was addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. The analysis determined the project would result in a less than significant water supply impact.

Emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Regarding impacts to police services, Section 5.14 of the Draft EIR provides an assessment of public service and facility impacts, specific to police services and facilities. The Draft EIR determined that impacts to police services and facilities would be less than significant.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

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Comment Letter I278

**From:** nsubbarao@hotmail.com <nsubbarao@hotmail.com>  
**Sent:** Monday, February 8, 2021 10:14 AM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Ms. Shearer-Nguyen and City council,  
 I, Suba Nelakuditi is strongly against the proposed Trails at Carmel Mountain Ranch project for the proposed plans.

**Environmental impact:** Existing roads are designed for the population with that existing house hold. with the proposed plan these is going to be huge impact on the roads when there is an emergencies like fire, medical emergency services and so on. There is huge impact on the current owner who opted years ago as per the existing scenarios of the area. With the increase traffic the daily commute also heavily impacted.

**Social impact:** The kids elderly community will be impacted with the quality of time. The shopping lines also increases with that the regular like style like spending time with family also impacted for the existing home owners.

**Impact on Education:** the schools designed for the existing house hold and papulation. With the proposed project that the population increase has huge impact on the schools which is NOT going change the current capacity and resources.

Subbarao Nelakuditi  
 11987 EastBourne rd  
 San Diego, CA-92128

I 1278-1

I 1278-2

I 1278-3

I 1278-4

Response to Comment Letter I278

278 Subbarao Nelakuditi

February 8, 2021

**I278-1** Comment noted.

**I278-2** Traffic was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Emergency services were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to emergency services, including fire and police services and facilities, were determined to be less than significant.

Utility infrastructure was addressed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

**I278-3** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Shopping lines and quality of life are not physical changes to the environment.

- I278-4** School capacity is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Comment Letter I279

From: Sue T. <suet44@gmail.com>  
Sent: Saturday, February 6, 2021 11:32 AM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Trails EIR

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Good afternoon,

I strongly oppose re building more homes/apartments. We have enough as it is. My main concerns are: **traffic, safety,** school over crowded, lack of wildlife/greenery.

Carmel Mountain has enough and we do NOT need more.

Carmel Mountain resident.

Sue Taetzsch

I279-1

Response to Comment Letter I279

279 Sue Taetzsch

February 6, 2021

I279-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable Refer to **Master Response 3**. Refer to **Response to Comment 02-7** regarding public safety.

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Biological resources, including wildlife impacts, are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.



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Comment Letter I280

From: Susana Kravit <susana.kravit@gmail.com>  
Sent: Monday, February 8, 2021 12:31 AM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear City of San Diego,

I am a resident of Carmel Mountain Ranch, with a son in T-K and another son in 7th grade in the Poway Unified School District. I am extremely concerned about the huge impact that the proposed Carmel Mountain Ranch housing development will have on my local schools as well as our ability to safely evacuate in a wildfire emergency.

1. Increased density/road traffic will impact the ability for the Carmel Mountain Ranch residents to evacuate quickly in the event of a wildfire. Bordering CMR on the south, a large undeveloped area (Van Dam Peak) is considered "Fire Hazard Severity Zone" rating of Very High (highest rating possible). <https://www.readysandiego.org/wildfire-hazard-map/> [reference image attached] If a wildfire broke out on the Van Dam Peak mountain, the entire CMR community would need to evacuate in less than 20 minutes. During the Coco Fire in 2014, it took the community over two hours to evacuate. Increasing the housing density by 37% and adding 3,180 residents to the CMR community will significantly impact the ability for residents to evacuate quickly.

2. The PUSD schools Shoal Creek Elementary, Highland Ranch Elementary, Middlebrook Middle, and Rancho Bernardo High will be significantly impacted by the number of students that will result from the proposed Carmel Mountain Ranch Trails project. The Trails project would include 451 townhomes, 629 market-rate apartments, and 120 affordable apartments. The Carmel Mountain Ranch Trails EIR report states:

"Based on the PUSD multi-family student generation rates, the proposed project is estimated to generate 193 elementary school students, 90 middle school students, and 121 high school students, resulting in a total of 404 students within the PUSD school system." [EIR Ref page 4.14-13]

The major flaw in the EIR Table 5.14-7 is that the data is based on the calculation of all the residences being classified as multi-family properties, which has historically generated 0.33 student per residence. However, the 451 townhomes will be 3-4 bed residences, and most likely priced at or above what the 3-4 bed residences are currently priced at the nearby Pacific Village townhomes [https://www.zillow.com/community/pacific-village-commons/2082462254\\_zpid/](https://www.zillow.com/community/pacific-village-commons/2082462254_zpid/). These are being priced at \$971,000. At this price range, this will be a "single-family" home, as detached single family homes are starting at 1.1-1.2 million in the CMR area, and out of the price range of the average family.

Since the primary purchaser of a newly built 3-4 bed family home in an excellent school district would be families with school-age children, the assumption that the 451 townhouses would only generate 148 students in the PUSD school system seems incredibly flawed. Most likely at least 90% of the homes will be sold to families, most likely averaging 2.2 children. This would generate 992 students plus 247 students from the apartments, totaling 1,239 students who would be attending the above listed PUSD schools. Poway Unified will not have the ability to absorb this many students into the local schools, putting the educational quality at risk when classroom numbers are too high.

Please consider approving a smaller number of new homes being built in CMR, to ensure that the City's infrastructure can support a good quality of life for its residents.

Kind regards,  
Susana and Alan Kravit  
11951 Brewster Ct  
San Diego, CA 92128

Response to Comment Letter I280

280 Susana and Alan Kravit

February 8, 2021

I280-1

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**. The comment addresses subject areas, which received analysis in the Draft EIR.

I280-2

Refer to **Response to Comment I280-1**.

I280-3

Refer to **Response to Comment I280-1** regarding schools. Specific to the issue of student generation rates, the Draft EIR explained that are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. As discussed therein, PUSD does not have standard generation rates; however, estimates were provided within the PUSD 2020 Development Fee Justification Study produced in May 2020. The project's total estimated student generation was based on the student generation rates associated with multi-family dwelling units provided within this study. As provided in the PUSD 2020 Development Fee Justification Study, the student generation rate for multi-family dwelling units is a total of 0.3349 students per unit combined

for all grade levels. For single-family attached units, the student generation rate is a total of 0.3481 students per unit combined for all grade levels. Therefore, if the 451 townhomes were calculated based on the single-family attached student generation rate provided in the PUSD Study, these proposed townhomes would result in approximately 157 total students for all grade levels. Under the multi-family attached unit student generation rate, these proposed townhomes would result in approximately 151 total students for all grade levels. The resulting difference in student generation would be 6 students based on the student generation rates for single-family attached and multi-family attached as provided in the PUSD Study. Therefore, if the single-family attached student generation rate was used for the 451 proposed townhomes, the difference in student generation would be negligible. Refer to **Master Response 6** for additional information pertaining to schools.

Comment Letter I281

**From:** Pijatida Lee <pijatida.lee@outlook.com>  
**Sent:** Monday, February 8, 2021 9:19 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006.

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

I'm writing to adress my concern about the number of units to be built in Carmel Mountain Ranch (CMR).

Me and my family moved to CMR in 2016. We purchased our house here due to the proximity to the Highland Ranch Elementary school and the neighborhood.

We soon noticed, when it was time to bring our son to the school, that a lot of parents parked around the neighborhood to bring their kids to scgool as well.

Already now the situation here during school times with respect to parking is crazy. Sometimes even so crazy that people park really close to the driveways or even block them half way.

The same situation is valid for the close by shopping center. Especially during the weekend that mall is busy.

What is the plan regarding traffic and parking when 1200 units are being build?

Residents who will move into those 1200 units will need to park their cars somewhere.

Almost every household has 1 car. This means approx. 1200 cars more will be parked around here.

Also, what will be done to assure the safety with respect to driving?

Even though it is a 25mph road, there are so many cars driving significantly faster through the neighborhood. Adding more cars will make it more dangerous especially for young children.

I do understand that the housing situation in San Diego needs to be improved but is it really needed in an area where many families with kids moved due to the safety, the silence of the golf course and proximity to schools and stores?

1200 units are a lot. Multiple storage homes are not the reason why owners signed a contract when purchasing properties in CMR for a big amount of money and I'm pretty sure I'm not the only one seeing it like this.

If i would have wanted people living right in front of us and being able to look into our house any time they want, i would have purchased a property in Mira Mesa, downtown or L.A.

Having units right behind our fence will influence our privacy and safety.

I didn't not picture me and my family being watched while having dinner or just relaxing in the living room.

If you haven't been yet please, before you consider this plan from New Urban West, CMR on the weekends and during schol drop off/ pickup times during the week. Please keep in mind though that due to the current covid restrictions traffic is less than normal. Ounce everything is beck to normal, hopefully soon, the traffic will at least triple.

Thank you  
 Susanne Lee

Sent from my Galaxy Tab® S2

Response to Comment Letter I281

281 Susanne Lee

February 8, 2021

I281-1

Traffic, including traffic safety and roadway hazards, is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/ circulation and parking.

I281-2

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety.

I281-3

Refer to **Response to Comment I281-1** and **Master Response 3**.

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Comment Letter I282

-----Original Message-----

From: Therese Oneill <oneillcnm@gmail.com>  
Sent: Monday, February 8, 2021 8:13 PM  
To: DSD EAS <DSEAS@sanidgo.gov>  
Cc: Troy@wealthanalytics.com  
Subject: [EXTERNAL] Project name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\*

To Whom It May Concern,

I am writing this email to voice my concern regarding the proposed development project by New Urban West in the Carmel Mountain Ranch master planned community. I have read through the proposal and the following issues are the most concerning to me:

1) The purpose of being a master planned community is that thought went into the best place for single family homes and higher rise apartment/condo's to be situated so that property values are positively affected. As things are now, the apartment/condos are closer to the shopping area and are in a lower elevation than the single family homes. With this new proposal, multi-level apartments/condos will be situated amongst the existing single family homes. I am concerned that property values as well as aesthetics will be affected.

2) I am concerned that the existing roads will not be adequate to handle the increase in population that the proposal would bring about. The traffic and congestion is already an issue as it is - more housing will only make this worse.

3) I am tired of looking at falling down fences and dead fairways - what our community needs is more open spaces for trails, walking and bike riding - this will not only increase property values but the quality of life for all of us that call CMR our home. I realize we need more housing - I would hope a compromise can be reached to add some housing but also more open space for recreation

Thank you,

CMR Resident

11857 Wilmington Rd San Diego, CA 92128

I282-1

I282-2

I282-3

Response to Comment Letter I282

282 Theresa Oneill

February 8, 2021

I282-1

Aesthetics are discussed in Section 5.17, Visual Effects/ Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment.

I282-2

Traffic is discussed in Section 5.2, Transportation/ Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I282-3

Refer to **Response to Comment 02-11a** regarding open space. Refer to **Response to Comment 02-11b** regarding the City's park development process.

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Comment Letter I283

From: Thong Cao <tvcao@aol.com>  
Sent: Sunday, February 7, 2021 6:53 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Reference: The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006  
Dear Ms Shearer-Nguyen:  
My name is Thong Cao and I am a resident and homeowner in the Carmel Mountain Ranch area since 1992. As a master-planned community, all CMR residents adhere to the Carmel Mountain Ranch Community Plan.  
The Trails development, project number 652519/SCH No. 2020039006, as proposed by New Urban West did not provide answers to a number of issues.

- The Trails development has its own master association and did not refer to or coordinate with the existing CMR residential association. This will result in a number impacts which CMR has planned to address 30 years ago. Some of these benefits include:
  - Wide access to a number of services and amenities
  - High degree of safety and security
  - Stabilized property values
- The 1,200 unit new development includes approximately 60% rental property; it is proposed as an affordable housing development yet has a majority of rental units. If the Trails development is meant to an affordable housing development for new families, it will need to provide more ownership opportunities.
- In reviewing the 2020 crime rates in CMR as reported on ARJIS, there is an increase compared to 2019 and previous years. An increase in population without planning for additional law enforcement support will result in increasing crime rates.
- Another by-product of increased population and traffic is the increased road decay as seen on some the streets around CMR (e.g. Highland Ranch Road, Rancho Carmel Road to name a few).
- The Trails proposal also includes a number of bike paths which did not take into account environmental impact analysis. Since there was not any reference or coordination with the CMR Community Plan, this proposal ignores a number of recommendations for off street, major street, and neighborhood guidelines (see Figure 15 on page 58 of the CMR Community Plan filed with the San Diego City).
- Another missing analysis was for wildfire protection for these new construction. Typically, there should be a wildfire impacts analysis presented.

Ms Shearer-Nguyen, the above are some of my concerns with The Trails proposal. I'm counting on you as the Environmental Planner for the City of San Diego Development Services Center to continue to work with New Urban West to obtain reasonable answers.  
Thank you very much for all your assistance in resolving this matter.  
Sincerely,  
Thong Cao

I283-1

I283-2

I283-3

I283-4

I283-5

Response to Comment Letter I283

283 Thong Cao  
February 7, 2021

I283-1

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. HOA coordination, property values, security, home ownership and crime are not physical changes to the environment. Refer to **Response to Comment 02-7** regarding public safety.

Public services and facilities, including police services, are discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to police services and facilities were determined to be less than significant. Refer to **Response to Comment 02-11b** regarding the City's park development process.

I283-2

Traffic was addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I283-3

To clarify, all the planned bicycle facilities included in the Community Plan and Bicycle Master Plan have already been constructed. The project would include a trail system that would circulate throughout the project site to provide increased mobility and recreational opportunities for pedestrians and bicyclists. The proposed trail system is part of the project and



therefore, was analyzed as a project component throughout the Draft EIR where applicable to the environmental issue. Refer to **Master Response 1** and Table 5.1-3 of the Draft EIR regarding the project's consistency with the Community Plan.

**I283-4** Wildfire impacts are discussed in Section 5.19, Wildfire, of the Draft EIR. Wildfire impacts were determined to be less than significant. Refer to **Master Response 5**.

**I283-5** Comment noted.

Comment Letter I284

Response to Comment Letter I284

284 Tim Phan  
February 7, 2021

From: Tim Phan <timphan4@gmail.com>  
Sent: Sunday, February 7, 2021 4:42 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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Good evening  
I am a resident at this neighborhood for almost two year now. The proposed future project will definitely have a significant impact on traffic not only in the vicinity of the neighborhood but also all the entrance and exit ramps within I-15 at Carmel Mountain road and SR-56/I-15 interchange. These ramps on I-15/Carmel Mountain rd and the Sr-56/I-15 interchange are built out and cannot handle additional traffic without decreasing Level of Service (LOS) way down. In addition, more traffic will dump onto the SB I-15 and and WB SR56 during the AM peak hours which will reduce the the LOS to D or even F (complete stop and go).

I'm writing this to express my concern as a citizen.

Thank you  
Tim Phan

--  
Sent from Gmail Mobile

I284-1

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. transportation/ circulation impacts were determined to be significant and unavoidable. With regard to traffic along I-15 and SR-56, the City's Transportation Study Manual established study requirements for transportation analysis in the City. The Transportation Study Manual does not require the analysis of freeway segments in the Local Mobility Analysis. The Transportation Study Manual also does not require the analysis of ramp meters in the Local Mobility Analysis. Vehicular queueing at freeway off-ramp intersections was evaluated int the Local Mobility Analysis (Draft EIR Appendix C) for all analysis scenarios, and no ramp queues were found to exceed storage capacity. Refer to **Master Response 3**.

I284-1

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Comment Letter I285

From: Tom Hodges <thodges@Ellsworth.com>  
Sent: Monday, February 8, 2021 5:29 PM  
To: DSD EAS <DSEAS@san Diego.gov>  
Cc: Troy@WealthAnalytics.com  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To whom it may concern,  
I would like to voice my concerns over the planned development of CMR.

To be honest, I'm extremely disappointed as to what is planned and shows sheer greed by the developers to pack the surrounding community. Here are my specific reasons:

- It will entirely add too many people already to an overcrowded community. You already struggle to find parking at the local shopping centers and the residential streets are full with homeowners already having limited parking spots.
- Low income housing will affect the overall values of our homes.
- Low income housing brings in transient families that have no intent to invest in our neighborhoods.
- The overall safety and our ability to evacuate the neighborhood in an event of a natural disaster.
- I'm assuming building on these strips of land is inevitable so I'd prefer to see single family dwellings that blend in with the surrounding communities rather than high rise condos.
- I hope to see much of the space preserved and put to good use (dog parks, hiking/biking trails, children's play grounds, community gardens, vineyards...)

Save CMR!

Tom Hodges  
Engineering Sales Representative  
Ellsworth Adhesives | ESR Group  
Email: thodges@Ellsworth.com | Web: [ellsworth.com](http://ellsworth.com)  
Mobile: +1 (858) 663-6030

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Response to Comment Letter I285

285 Tom Hodges  
February 8, 2021

I285-1 Comment noted.

I285-2 Population inducement is discussed in Section 5.13, Population and Housing, of the Draft EIR. As explained in **Master Response 9**, the project's potential impact on population growth was determined to be less than significant in the Final EIR based on the 2020 Update to the General Plan's Housing Element. Refer to **Master Response 3** regarding parking.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values and transiency are not physical changes to the environment.

I285-3 Refer to **Response to Comment 02-7** regarding public safety. Evacuation is discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I285-4 Comment noted.

I285-5 Refer to **Response to Comment 02-11a** regarding open space. Refer to **Response to Comment 02-11b** regarding the City's park development process.

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Comment Letter I286

From: Tony Maude <tmaude@navaide.com>  
Sent: Monday, February 8, 2021 10:42 AM  
To: DSD EAS <DSDEAS@sandiego.gov>  
Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

ATTN Environmental Planner of San Diego,  
  
As a homeowner of Carmel Mountain Ranch (CMR) I am very concerned with the subject development that is being propose by New Urban West.  
  
The proposed development will created massive environmental damage, traffic, fire safety evacuation issues, stress on schools, libraries, etc. Specifically, I feel that this housing development will create too much congestion in CMR, and it is not in-line with the CMR Community Plan. Over congestion can create issues with fire safety and evacuation, in an area of San Diego that is high risk for brush fires. Furthermore, many residents moved to CMR for the great schools, which will be over extended with an increase of 1200 families. This will likely bring down property values in the area once the quality of education decreases due to over population.  
  
Please feel free to contact me should you have any questions. Thank you.

Best Regards,  
Tony

Anthony (Tony) Maude  
CMR Homeowner  
Address: 14581 Rutledge Sq.; San Diego, CA 92128  
Phone: 619-279-7297

I286-1

Response to Comment Letter I286  
286 Tony Maude  
February 8, 2021

Traffic is discussed in Section 5.2, Transportation/ Circulation, of the Draft EIR. Transportation/ circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Schools and library facilities were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Impacts to library facilities were determined to be significant and unavoidable. Refer to **Master Response 6**.

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses subject areas, which received analysis in the Draft EIR.

I286-1

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Comment Letter I287

**From:** Troy Brinza <tbrinza@gmail.com>  
**Sent:** Monday, February 8, 2021 4:54 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Troy@wealthanalytics.com  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

TO: SD City Planning Department

RE: Preserving the spirit and beauty of Carmel Mountain Ranch

Growth and change are inevitable. However, when it comes to growth in San Diego, we should carefully consider how to go about that. I understand that the City of SD supports a "City of Villages" strategy with mix-use villages located throughout the city and connected by high quality transit." This makes sense to me.

One of the reasons I like this strategy is that the developers create infrastructure, open spaces, retail, services, parks, and mixed-use buildings in addition to the housing. The mixture of these elements should be well-planned and appropriate for each community. It creates the neighborhood "vibe". It allows (or forces) developers to create neighborhoods that are highly desirable for people to live in.

The proposed development on the former site of the Carmel Mountain Ranch golf course does not meet this strategy, in any way. I am adamantly opposed to the in-fill development on the individual fairways. I would like to share my thoughts as a resident of the Carmel Mountain Ranch community.

As this conversation has developed over the last couple of years, I cannot help but to juxtapose it with the city of San Diego's favorite theme: "America's Finest City". As we discuss the proposed development in Carmel Mountain Ranch, let's consider that theme as our lens to view the project. Does the proposed development improve our quality of life in San Diego and contribute to our claim as America's Finest City? How does the development improve the schools, public services, retail, way of life in Carmel Mountain Ranch? Honestly, I cannot identify one benefit for the existing members of the community.

1. **The project does not adhere to the existing character of Carmel Mountain Ranch.** The range of housing types are not compatible with the adjacent established residential communities. More importantly, the location of the proposed buildings is inappropriate as it relates to the existing homes.

"The Trails" project consists of 100% multi-unit buildings. The CMR community has 47%.

"The Trails" project consists of 70% apartments, CMR has 24%

"The Trails" project offers no single-family homes, CMR consists of 52%

1

Response to Comment Letter I287

287 Troy Brinza

February 8, 2021

I287-1

Refer to **Master Response 1**, and Table 5.1-2 and Table 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan.

I287-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment. The comment addresses a subject area, which received analysis in the Draft EIR.

I287-1

I287-2



And most notable, "The Trails" proposes building heights at 37' and 48' with minimum building setbacks at 50ft from the property lines of existing 2 story homes.

50 feet? Let's think about that for a moment...current homeowners would walk to the property line of their backyard. The new multi-family dwelling, standing 37' to 48' high, could begin 17 paces (one pace = 3 feet) from that property line. How will that impact the property values of the current residents? Who would want to live with a 37' to 48' structure sitting 17 paces beyond their backyard? Would you?

## 2. The fallacy of calling the MTS parking facility in Sabre Springs a component of "mass transit".

The MTS facility is a fancy park and ride. It allows a place for people to meet up before they carpool. That's great. However, the limited capability of "mass transit" from this location is breathtaking. Citizens have the choice of three public bus routes. Two go to downtown SD, and the third goes to Poway. If you took a poll of the current residents of Carmel Mountain Ranch asking how many moved here due to the proximity of the bus stop, you'd be lucky to get one positive response.

In addition to limited public transportation, only a small percentage of proposed units within "The Trails" project are located within a half-mile of the transit center. Some of the housing is located 2 miles walking distance from the Transit Center and half mile from the community grocery store. Other residential units average 1.5 miles from the Transit Center and 1 mile to the local grocery store. These units exceed the half-mile walkable goal in the City's Mobility Element. Only a small portion of units will be within "walking distance" of Transit Station.

## 3. Overcrowding and existing residential development in the area

There are two large residential developments currently under construction directly across the 15-Freeway from Carmel Mountain Ranch. While both are "officially" located in the community of Rancho Penasquitos, the people moving into those developments will most definitely shop in Carmel Mountain Ranch.

The "Pacific Village" project is located on Carmel Mountain Road at the northwest corner of state Route 56 and Interstate 15, the bulk of the site will be used by Lennar for development of a residential neighborhood that will include 99 single-family homes, 105 triplexes and 120 townhomes.

"The Junipers" project is a new, age-qualified, active adult (55+) residential neighborhood of 455 single-family homes and 81 units for fixed-income seniors. It will be located on the old Carmel Highlands Golf Course, also on Carmel Mountain Road, on the west side of the freeway.

And we're considering another 1200 units in addition to these?

The current projects already guarantee over-crowding and a degradation in quality of life as it relates to the existing residents of CMR. **But what about public safety issues?** Twice in the last 15 years, our area has been threatened with major fires. How does the addition of hundreds of new homes impact evacuation of the area when the next fire comes? Again, how does that enhance the quality of life for the existing residents of CMR? Does this sound like America's Finest City?

2

I287-3

Public Resources Code Section 21064.3 defines a major transit stop as any of the following: (a) an existing rail or bus rapid transit station, (b) a ferry terminal served by either a bus or rail transit service, or (c) the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. The Metropolitan Transit System (MTS) Sabre Springs Transit Station (Station), located less than 0.5 miles from the project site, provides one rapid bus service, the Rapid Express 235 line from Escondido to downtown (San Diego MTS 2019). Therefore, the Station is considered to be a major transit stop pursuant to Public Resources Code Section 21064.3.

I287-4

As stated in Chapter 2, Environmental Setting, the project site is located within the TPA Overlay Zone, as shown on the City's TPA map (City of San Diego 2019a). San Diego Municipal Code Section 143.1103(a) (2) defines Mobility Zone 2 as "any premises located either partially or entirely in a [TPA]," therefore, the entire project site is considered to be within a transit priority area.

I287-5

Population inducement is discussed in Section 5.13, Population and Housing, and cumulative impacts are discussed in Chapter 6, Cumulative Effects, of the Draft EIR. The Pacific Villages project and The Junipers project, as mentioned by the commenter, were included in the cumulative analysis. As explained in **Master Response 9**, the project's potential impact on population growth and cumulative population growth impacts were determined to be less than significant in

**Project Alternatives** must include a low-unit-count option if we're going to preserve the beauty and quality of life in Carmel Mountain Ranch.

The current 1,200 and 825-unit options result in a significant unmitigable impact on transportation/circulation, public service, and population and housing. There should be an additional option where the impacts can be mitigated. A 250-unit option, limited to one or two-story structures, would likely result in a good compromise.

Thank you for considering the feedback of our community. The residents of Carmel Mountain Ranch take great pride in our community and we'd like to preserve the quality of life we purchased when we bought homes here.

Best regards,

Troy Brinza

13873 Fontanelle Place

San Diego, CA 92128

I287-7

I287-8

**I287-6**

the Final EIR based on the 2020 Update to the General Plan's Housing Element.

Wildfire and emergency evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and emergency evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

**I287-7**

Refer to **Master Response 10** regarding the Draft EIR's alternatives. The comment also expresses general concern with the significant and unavoidable impacts of the project. The City Council will be required to make findings for each of the significant effects identified in the EIR pursuant to CEQA Guidelines Section 15091(a) (3). Pursuant to CEQA Guidelines Section 15093, the decision-makers are required to balance the benefits of a project against its unavoidable impacts when determining whether to approve a project. A Statement of Overriding Considerations will be provided to the City Council for its consideration when it decides whether to approve or deny the project.

**I287-8**

Comment noted.

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Comment Letter I288

From: Valentin Sunico <vsunico@sbcglobal.net>  
Sent: Saturday, February 6, 2021 7:17 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name - The trails at Carmel Mountain Ranch; Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

We have lived in Carmel Mountain Ranch for over 30 years. A community of very close knit neighbors. Not congested, not polluted, very peaceful, an environment that most people wanted to be. And hardly have any crime.

This plan will destroy the life that most residents enjoy. They have worked hard all their lives to find a perfect place to be for their retirement. It will DECREASE the home values of the community.

With this planned Trail project, which is close to the residential homes, Its a potential for CRIMES. Have you all considered this possibility. None residents using the Projected Trail could or might scan houses near the Trail.

Few months back, Felons were given an early released by the thousands. Can you guarantee that crimes will not increased due to this Projected Trail Plan.

Concern Residents,

Valentin & Elizabeth Sunico  
13975 Stoney Gate Pl.  
San Diego, Ca. 92128

I288-1

Response to Comment Letter I288  
288 Valentin and Elizabeth Sunico  
February 6, 2021

Privacy is not an issue that is required to be analyzed under CEQA or based on the City’s CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime and property values are not physical changes to the environment.

I288-1

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Comment Letter I289

From: Valerie Chandler <vcchandler22@gmail.com>  
Sent: Monday, February 8, 2021 12:46 AM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

I am writing to you to express my concerns regarding the Trails at Carmel Mountain Ranch Project number 652519.

As a long term resident of Carmel Mountain Ranch I have enjoyed living in a community that has been safe, supportive and has been extremely family oriented. The proposed Trails at CMR project has a number of environmental impacts that are extremely concerning to the neighborhood.

The Carmel Mountain Ranch neighborhood is already extremely dense. The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Nowhere in the basic treatment of fire evacuation re the community itself (pdf page 603, 5.19 Wildfire; PDF pages 613-18, 5.19.3 Impacts Analysis. Issues 1-3), or considered with cumulative impacts of adjacent communities (PDF page 637, 6.1.19 Wildfire) are evacuation times even mentioned.

Those of us who live in California see the dangerous fires that have caused massive destruction each year to neighborhoods whose density is far less than what is being proposed with the Trails project. Long time residents remember the Scripps Ranch fire that destroyed many homes and took years for families to recover – some never did. The addition of 3,180 additional residents and the close proximity of these new buildings to existing homes will only increase the likelihood that once a fire begins, that it will quickly spread and burn down additional homes.

Having an addition 3,180 residents and the increase in the number of vehicles trying to evacuate quickly in the event of a fire, in a neighborhood that is already dense and shares roadways with families in Rancho Bernardo, Poway and Rancho Penasquitos is a recipe for disaster that creates an opportunity for increased number of deaths and a neighborhood completely wiped out by fire. Can you imagine if that was your neighborhood and family that was trying to escape?

In addition, the Trails as Proposed Will Not Meet Proposed Uses and Will Create Other Problems Project Objective 6, section ES.3 not met - Establish a multi-use trail system for pedestrians and bicyclists with connections to major amenities and adjacent neighborhoods. Establish a public system of trails and paths for community-wide use, thereby providing enhanced neighborhood connectivity. The Trails should accommodate many types of users such as walkers, hikers, joggers, runners, bird watchers, dog walkers, bikers and be ADA compliant. The Width of Trails is too narrow, **not ADA compliant** and creates existing homeowner's safety, security, noise and privacy issues. Multi-use trails need to be at least 12 to 14 feet wide to accommodate two-way traffic and be a minimum of 50' from existing homeowner fences. The majority of the development is on very hilly and sloping topography.

Carmel Mountain Ranch was built around numerous golf course holes to ensure that neighbors had open land and the ability to view open and green space. By filling in the majority of the golf course holes with apartment buildings and condominiums creates a concrete jungle and removes the aesthetics and the park like views that every neighborhood needs especially those that have few parks available to them in comparison to the number of residents in the area.

I289-1

I289-2

I289-3

I289-4

Response to Comment Letter I289  
289 Valerie Chandler  
February 8, 2021

- I289-1** The City acknowledges the comment letter and notes it provides an introduction to the comments that follow.
- I289-2** Wildfire and emergency evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and emergency evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- Cumulative impacts are discussed in Chapter 6, Cumulative Effects, of the Draft EIR. Cumulative wildfire and evacuation-related impacts were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.
- I289-3** Refer to **Master Response 3** regarding trails and ADA compliance. The project would meet Project Objective 6.
- I289-4** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. Refer to **Master Response 2** regarding aesthetics impacts and private views.

Finally, the proposed project is neither cohesive or respectful of the existing community project. Project Objective 7, section ES.3 not met. The project is not cohesive in that it infills former golf fairways spread throughout the Carmel Mountain Ranch Community. The density and type of housing will stand out instead of blending in with the community. It is 100% multi-unit buildings, the buildings are all three and four stories tall, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing homes.

I thank you for your consideration of these negative environmental impacts the proposed project will have upon our existing neighborhood.

Sincerely,

Valerie Chandler  
13922 Royal Dornoch Sq.  
San Diego, CA 92128

I289-5

I289-5

Refer to **Master Response 1**, as well as Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding land use compatibility and consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Additionally, potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2** regarding community character. The project would meet Project Objective 7.

Comment Letter I290

From: Vince Mario <vincemario64@gmail.com>  
Sent: Monday, February 8, 2021 3:36 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom it May Concern,

My name is Vince Mario. My family and I live in Carmel Mountain Ranch at:  
11948 Wilmington Rd, San Diego, CA 92128  
I am writing in concern of the above mentioned project. My concerns include the following:

Proposed construction is not compatible with existing homes. 100% multi-family units all multi-story is not a project that will match the community. Placing apartments that look down into yards of single family residences, or into private backyards and placing multi-family homes in between rows of single family residences is unacceptable. This project is not respectful of existing properties with three and four story high buildings set close up to homes.

A foundation for mixed use development already exists in retail centers in CMR and would be much more appropriate. This would create walkable communities that would make more sense and be more sensitive to a climate action plan. We never walk to stores or restaurants in our area because of long distances and already busy streets.

Safety, noise and privacy would be degraded placing such a high density of units so close to homes. Most homes in this area, especially in view lots have open bar fences. Allowing people to look directly into private areas, allowing noises to be easily heard causing safety issues from construction and emissions. Even new fencing would not likely be enough for the three and four story buildings to be placed directly next to homes.

The addition of 1200 new housing units negatively impacts the community in many ways. Increased traffic, noise, lights, emissions. Increase in local school density. More than 5 years of construction, pollution, noise is a major negative impact to our community.

When we moved our family into Carmel Mountain Ranch we chose this area for many reasons including the look of the community, the density of the community, the schools, crime rates and the suburban lifestyle. We do not want this project to make our area into what Mira Mesa or the more urban areas have become. I am very concerned about the safety, the density, the traffic, the noise and other negative impacts this project brings to the area where we chose to raise our family. Any consideration to our concerns is greatly appreciated.

Sincerely,

Vince Mario and the Mario family.

I290-1

I290-2

I290-3

I290-4

Response to Comment Letter I290  
290 Vince Mario  
February 8, 2021

- I290-1**

Privacy is not an issue that is required to be analyzed under CEQA or based on the City’s CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.
- I290-2**

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.

General health and safety and noise impacts were determined to be less than significant in Section 5.8, Health and Safety, and Section 5.11, Noise, of the Draft EIR, respectively. Refer to **Master Response 4** regarding noise. Refer to **Response to Comment I290-1** regarding privacy. The comment addresses subject areas, which received analysis in the Draft EIR.
- I290-3**

The project would be developed in phases, over an estimated four year period. Additional construction and phasing information is provided in Chapter 3, Project Description, of the Draft EIR.



Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Refer to **Response to Comment I290-2** for information on noise, emissions and pollution. Refer to **Master Response 4** regarding noise, **Master Response 7** regarding air quality, and **Master Response 8** regarding greenhouse gas emissions.

Project lighting is discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The analysis concluded the project would not result in a significant lighting impact.

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I290-4** Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Crime is not a physical change to the environment.

Comment Letter I291

**From:** Yashwant Muralidharan <yash\_blizz@yahoo.com>  
**Sent:** Monday, February 8, 2021 6:31 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Cc:** Saumya Manglik <saumyamanglik@gmail.com>  
**Subject:** [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To Whomsoever It May Concern

I loved the Golf Course at Carmel Mountain Ranch. Golf Course brought a promise of tradition, culture and sense of community. It is an agricultural land, that brought the promise of inclusion for seniors, privacy for kids and peace to busy professional since the inception of the community for decades. Carmel Mountain Ranch as a community has always had a vision to include a vital and large segment of population being senior citizens and kids. This beautiful lush green agricultural land is being replaced by 4 storied structures, and this destroys the spirit of the community that has been there for decades based on vision of serenity and peace.

I291-1

Since the 2018, I have seen some wildlife in our backyards. From Beautiful Blackbirds, to awesome Hawks and weird looking frogs that kids enjoy seeing and hearing almost all night. I have seemed to have grown certain fondness even the under maintained golf course. I wish we could have rebuilt this as the agricultural land itself and maintain the beautiful aura that makes this community beautiful.

I291-2

I do hope and pray that you are able to maintain this land as the agricultural land, that is supposed to be, especially because since the closure of the Gold club and the extensive rains this year, the fertility of the land has only increased. Doing is construction over perfectly fertile land that has become home of some beautiful species of animals, bids and amphibians, will be a wrongdoing against nature and environment. I hope you can come up with an innovative solution with help of environmentalist for this piece of land.

I291-3

When my Husband and I bought this our house in the Carmel Mountain ranch, we bought it because of the community that it represented. The beautiful Cul-de-sac, the great school district, and known people, traffic, and peaceful community that also had space of environment in it. The 4 storied structures, for rental purposes would stand against everything this community stands for. With new renters, every year, every month, it would bring huge safety concerns. With strangers who would not be house owners, so they would not have similar commitment towards the community but would still have a view onto our backyards and to our privacies. I feel unfair to this because we have put our life savings into buying a house to ensure privacy, safety, and a sense of committed community. This is heartbreaking and sad for us and our children.

1

**Response to Comment Letter I291**  
**291 Yash Murali and Saumya Manglik**  
**February 8, 2021**

**I291-1** Comment noted.

**I291-2** Wildlife is analyzed in Section 5.4, Biological Resources, of the Draft EIR. Impacts to biological resources, including wildlife, were determined to be less than significant with mitigation incorporated. Regarding the preservation of agricultural land, most of the parcels within the project site are currently zoned as Agricultural-Residential (AR-1-1). However, the project site has historically been developed as a golf course and is designated in the City's General Plan as Park, Open Space, and Recreation. The entire project site and immediate surroundings are also classified as "Urban and Built-Up Land" under the California Department of Conservation's Farmland Mapping and Monitoring Program. Therefore, as determined in Chapter 7, Effects Found Not to be Significant, of the Draft EIR, the project would result in no impacts to agricultural resources. The comment addresses subject areas, which received analysis in the Draft EIR.

**I291-3** Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Response to Comment O2-7** regarding public safety.

We bought this house since it has been walking distance from the schools, and the traffic on the roads is just about acceptable. However, with the number of renters and 4 storied buildings that are going to be introduced, the traffic is going to be unimaginable, and the safety concerns are only going to grow for our children and seniors. I can only imagine that what is going to happen the traffic is going to increase exponentially within the residential areas. Teachers are already stressed with the number of students in their class, and this amount of excessive rental properties, is only going to make it worse. This is going to be like increasing the quantity of students in Poway school district and may reduce the quality of the overall school ranking of the Poway schools. It's like a retail store, that chooses quantity of quality, and the school ratings will drop, this will furthermore make parents move to a school district with higher ratings.

If heartbreakingly you do decide and allow construction over this piece of land, then I request you to allow current land owners to buy additional piece of land adjacent to their property, if they wish to maintain it as an agricultural piece of land, that would allow some scope of environment preservation. I also hope, that if construction is permitted is allowed on this piece of agricultural land, the houses are ranch style, and are sold only to homeowners. Ranch style houses seniors would be able to move-in the houses. At the same time ranch-style houses would limit the no. of houses that can be built, reduce the privacy concern, and sense of committed community would remain. I love this neighborhood and our lives are bound here. This will also have a sense of service to the seniors and elderly.

I request you to let us be a part of the community that you are building and extending, instead of excluding us from the very community that we spent years building, and of which everyone wants to be a part of. Help us maintain the spirit of the community, environment, culture, privacy and safety.

Warm Regards,  
Yash Murali & Saumya Manglik  
12084 Ferncrest Pl., San Diego 92128

I291-4

I291-5

I291-6

I291-7

**I291-4**

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. The comment addresses subject areas, which received analysis in the Draft EIR.

Traffic and transportation safety are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I291-5**

School capacity is discussed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.

**I291-6**

Refer to **Response to Comment I291-2** regarding agriculture. Refer to **Master Response 1**, and Tables 5.1-2 and 5.1-3 of the Draft EIR, regarding zoning, land use compatibility, and the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Refer to **Master Response 10** regarding project alternatives.

**I291-7**

Comment noted.

Comment Letter I292

From: Hamilton McWhorter <Hamilton@hmcwhorter.com>  
Sent: Saturday, February 6, 2021 1:54 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

I am writing to express my objection to the Trails at Carmel Mountain Ranch Project, I have lived in CMR for the last 32 years. We purchased our home with the understanding that the community plan would be respected. This project does not respect that plan and in fact, threatens to radically alter the community we have built over the years.

Carmel Mountain Ranch was designed with the golf course land counting as part of the community's Open Space and per the Community Plan, "as a physical and visual amenity that will link the natural and physical features of the community into a coherent whole". The Trails at CMR takes away the very concept that Carmel Mountain Ranch was built upon, using open space of the golf course to define and link the community. Boundary planting, even with a pathway cannot mitigate the placement of apartment and condominium complexes along with their connecting roads, parking lots, and refuse enclosures in the most central area of more than half of the former fairways.

For these and many other reasons, I urge you to reject this "plan" that will have serious deleterious effects on our community.

Hamilton McWhorter  
13989 Stoney Gate Place  
San Diego, CA 92128

I292-1

I292-2

Response to Comment Letter I292  
292 Hamilton McWhorter  
February 6, 2021

- I292-1
- Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**.
- I292-2
- Refer to **Master Response 1** and Table 5.1-3 of the Draft EIR regarding the project’s consistency with the Community Plan.

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Comment Letter I293

From: crissyo@san.rr.com <crissyo@san.rr.com>  
 Sent: Monday, February 8, 2021 10:58 AM  
 To: DSD EAS <DSDEAS@sanidiego.gov>  
 Subject: [EXTERNAL] Project Name - The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

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To Whom It May Concern,

If the developers who want to build homes on the abandoned Carmel Mountain Ranch golf course ("CMRgc") property were to take the below measures, it would surely make a positive difference to current homeowners who may otherwise be adverse to the construction of this development.

The developers should be respectful of those who already own homes in the area and take measures in the construction and design of such land improvements such as:

1) HOME VALUES - Structure designs and open space planning should add value to our existing homes, not decrease it.

2) NOISE - Those of us who bought homes in Carmel Mountain Ranch before the golf course closed, purchased our homes knowing that the land around our homes was quiet, open and maintained. Every measure should be taken to reduce noise (i.e. parking structures/lots should be built away from existing homes and ample space should be left between existing homes and new construction).

3) OPEN SPACE - Ample open space should be available to ALL (not just those that will live in this new community); including ideally: parks (including a dog park), walking/bike trail(s) and plenty of landscaping to encourage fauna to flourish.

4) CONSTRUCTION - Measures to lessen noise and mess during construction should be taken as well as existing street changes (i.e. new traffic lights, street widening, etc.) to help traffic flow where new traffic would be heaviest.

5) MASTER COMMUNITY - The CMRgc is very intertwined into the existing Carmel Mountain Ranch master community. What adverse changes would a new master community affect current homeowners? Would that mean that outsiders couldn't use the open space? Would this new master community work against the current master community? Would this new master community bring existing home values down? If the answers to these questions are "yes" then the developers need to take a closer look at how to positively impact the current homeowners and master community - work together and not against.

Although I do not speak for all of Cambridge, I want to thank you for your time and consideration of my opinion and thoughts.

Carmel Mountain Ranch Homeowner  
 Cris Olsen (Cambridge HOA President)

I293-1

I293-2

I293-3

I293-4

I293-5

I293-6

Response to Comment Letter I293

293 Cris Olsen  
 February 8, 2021

I293-1

Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment.

I293-2

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

I293-3

Refer to **Response to Comment 02-11a** regarding open space.

I293-4

Refer to **Response to Comment I293-2** regarding noise. Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**. The comment addresses subject areas, which received analysis in the Draft EIR.

I293-5

To clarify, the project will include an independent HOA. Refer to **Response to Comment 02-11a** regarding open space. Pursuant to CEQA Guidelines §15064(e), the EIR need not address economic or social changes unless the change would result in a significant physical environmental impact. Property values are not physical changes to the environment.

I293-6

Comment noted.

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Comment Letter I294

From: Shilpa Parikh <shilpa19205@gmail.com>  
Sent: Monday, February 8, 2021 11:06 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Name – The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To:  
E. Shearer-Nguyen, Environmental Planner,  
City of San Diego Development Services Center,  
[1222\\_1st Avenue\\_MS 501\\_San Diego\\_CA 92101](mailto:1222_1st Avenue_MS 501_San Diego_CA 92101).

From:  
Shilpa Parikh  
[12088 Ferncrest Place\\_San Diego\\_CA 92128](mailto:12088 Ferncrest Place_San Diego_CA 92128)

Comment is sent Via e-mail to [DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov).

Dear Ms. Shearer-Nguyen and City Council:

**Project Designs are NOT Sensitive to the Well-established Character of CMR**

Our houses are around 30 feet tall / 2 story buildings. The apartment buildings will be around 70 feet tall and only 50 ft from our house boundary. Also, based on the downward slope, the height will be even appear more since our street is bit lower in elevation. AS per Urban design guidelines, Pg. 174 Policy UD-B.2 "c. Provide transitions of scale between higher-density development and lower density neighborhoods." - It is not apparent The Trails has any transitions of scale between higher and lower density development.

**Like housing:**

For every community meetings I attended, the builder mentioned that it will be like housing to match the community. It was only in 18th or 19th meeting when they proposed 3-4 story buildings. The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%.

**Project EIR Omits Walkability from City of Villages Compliance Evaluation**

As per the General planning, the proposal is to build a city where walking is a viable travel choice, particularly for trips of less than one-half mile."

The proposed density and parking is based on the assumption it is close to the transit center. However, due to hilly nature of the area and 1.5 miles walking distance from the transit center, most of the buildings are not walkable from the transit center

I294-1

I294-2

I294-3

Response to Comment Letter I294

294 Shilpa Parikh  
February 8, 2021

**I294-1** Community character is discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

Refer to **Master Response 1**, and Table 5.1-2 and Table 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. The comment addresses subject areas, which received analysis in the Draft EIR.

**I294-2** Community character is discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Additionally, refer to **Master Response 1** regarding density.

**I294-3** Refer to **Master Response 1**, and Table 5.1-2 and Table 5.1-3 of the Draft EIR, regarding the project's consistency with the City's General Plan and the Carmel Mountain Ranch Community Plan. Also refer to **Master Response 3** regarding parking.



**Traffic**

The traffic is already very high. Adding 25% additional population is going to make it worse. Have you counted pre-covid traffic in consideration?

I294-4

**Wildfire:**

This area is designated as high risk from wildfire perspective. Current escape routes are not adequate. Adding additional housing is going to make it worse. Have you looked at what it takes to get the home insurance and can you guarantee it will not increase our risk?

I294-5

Thanks,

Shilpa Parikh

[12088 Ferncrest Place](#)  
[San Diego, CA 92128](#)

Sent from my iPhone

**I294-4**

For clarification, roadway and intersection traffic counts for the Local Mobility Analysis (Draft EIR Appendix C) were taken in 2019, prior to the COVID-19 pandemic. Transportation/circulation impacts are discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

**I294-5**

Wildfire and emergency evacuation are discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Wildfire and emergency evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Comment Letter I295

From: jennifer covin <jennifer.covin9@gmail.com>  
Sent: Sunday, February 7, 2021 7:15 PM  
To: DSD EAS <DSEAS@sanidiego.gov>  
Subject: [EXTERNAL] Project Number 652519 / SCH No. 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom It May Concern:

I am writing regarding the proposed project entitled "The Trails at Carmel Mountain Ranch", Project Number 652519 / SCH No. 2020039006.

I have been a homeowner in the Carmel Mountain Ranch community since 1998, live in the Collage complex, and share a fence with the now closed Carmel Mountain Ranch Golf Course. I am writing to express my deepest concern about the proposed Trails at CMR project. While I understand the motivation of the current owners and the City to make something of the neglected space in our community where the golf course was previously functioning, the Trails project as proposed is absolutely not the solution.

There are numerous technical and environmental issues that I have reviewed in the plan that are of great concern. I am not knowledgeable enough to address these specifically, so I will leave that to others to communicate. I will focus on highlighting some priority areas of impact instead that would affect day-to-day living for me personally, and the greater community, that are of utmost importance. These include:

- the risk and negative impact on the health and safety of the current and future residents in Carmel Mountain Ranch
- the influx of traffic in an already very crowded area. This includes freeway access, main streets (Ted Williams and Carmel Mountain Road), and residential areas
- the inability to evacuate the area is already challenging and this plan escalates this and creates an unsafe environment
- the negative impact on parking and overcrowding in our community businesses
- the project does not achieve the goal to build homes that are compatible with the existing infrastructure originally planned for this community
- the housing types proposed are too limited
- the infringement on privacy given the proposed plan is too high

I urge you to reject this plan and consider the negative impact this will have on current and future members of the community. There has to be other solutions. I urge you to please seek other options to address the future use of this space.

Respectfully,

Jennifer Covin  
Owner, 11955 Tivoli Park Row #3, San Diego, CA 92128  
[jennifer.covin9@gmail.com](mailto:jennifer.covin9@gmail.com)

I295-1

I295-2

I295-3

I295-4

I295-5

I295-6

I295-7

I295-8

I295-9

Response to Comment Letter I295

295 Jennifer Covin

February 7, 2021

I295-1

The City acknowledges the comment and notes it provides an introduction to the comments that follow.

I295-2

Health and safety issues are discussed in Section 5.8, Health and Safety, of the Draft EIR. Health and safety related impacts were determined to be less than significant. Other topics that generally relate to health and safety include air quality, greenhouse gas emissions, geologic conditions, transportation, water quality, and wildfire. Refer to **Master Response 7** regarding air quality, **Master Response 8** regarding greenhouse gas emissions, **Master Response 3** regarding transportation, and **Master Response 5** regarding wildfires. Also refer to **Response to Comment O2-7** regarding public safety. These subject areas received analysis in the Draft EIR.

I295-3

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I295-4

Emergency evacuation is discussed in Section 5.19, Wildfire, and Section 5.8, Health and Safety, of the Draft EIR. Emergency evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

I295-5

Refer to **Master Response 3** regarding parking. Pursuant to CEQA Guidelines §15064(e), the EIR

need not address economic or social changes unless the change would result in a significant physical environmental impact. Overcrowded businesses are not a physical change to the environment.

**I295-6** Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. Impacts to utility infrastructure were determined to be less than significant with mitigation incorporated. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

Community compatibility is discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I295-7** Comment noted.

**I295-8** Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues.

**I295-9** Comment noted.

Comment Letter I296

Response to Comment Letter I296

296 Cooper Family  
February 7, 2021

From: Cooper Family <minicoop4@sbcglobal.net>  
Sent: Friday, February 5, 2021 1:10 PM  
To: DSD EAS <DSEAS@sandiego.gov>  
Subject: [EXTERNAL] EIR Input—Trails at Carmel Mountain Ranch Project #652519/SCH #2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear Environmental Planning Staff,

I am writing to provide input regarding the Environmental Impact Report (EIR) for the following project:

- ☐ Project Name: Trails at Carmel Mountain Ranch
- ☐ Project No. 652519 / SCH No. [2020039006](#)
- ☐ Community Plan Area: Carmel Mountain Ranch
- ☐ Council District: 5

Regarding:  
5.3 Air Quality and Odor  
5.11 Noise  
5.2 Transportation

The proposed large apartment building by golf course Hole 16 is only about 300-500 feet from Highland Ranch Elementary School, its ESS program buildings and play area, and Highland Ranch Park, as well as near the main intersection for families going to and from school. The air quality will be highly compromised for our neighborhood children by the excavating, grading, long-term construction equipment, and the on-going air pollution and ozone effect of vehicle exhaust, both from construction and from highly increased vehicle traffic. The dangers to children and people with asthma and other respiratory conditions must not be ignored. Causing new health problems such as valley fever because of disrupting the environment with pollutants is not as good as keeping open space and preserving a healthier natural, climate-friendly environment. The many hawks, ibis, raccoons, coyotes, bunnies, hummingbirds, etc., that we see daily behind our small yard, are much healthier to the many nearby children!

The construction noise will be distracting and detrimental to teachers and students at the school, as well as to the bordering residents, but there will also be endless increased noise pollution from extra trash trucks, delivery trucks, resident vehicles, etc., in the new development.

Our street, Eastbourne Road, already becomes blocked from school traffic; we literally cannot travel down our street at certain times of day when many cars are idling in the middle of the street waiting to enter the school parking lot to pick up children. Cars also routinely park on Eastbourne in "No Stopping" zones by the school. Cars also park and block part of our driveway during the start and end of school. These infractions will multiply in the neighborhood. More traffic will equal more traffic laws being broken. This is already an annoyance, to which many more cars will be added, probably backing traffic up all the way to Highland Ranch Road and on it as well, but it is an extreme danger to emergency equipment needing to get into our neighborhood! Adding so many cars to this part of Carmel Mountain Ranch is also a danger if evacuation is needed. The school bus stop for neighborhood children going to Meadowbrook Middle School is on Highland Ranch Road, right where the construction and future apartment entrance will be. The construction and future increased traffic at that spot is a danger to the safety of children walking to and from, and waiting at, the bus stop.

Please look at all the health and safety details of the proposed project more closely, and please consider the community plan and all its residents, and how to best meet climate and open space goals for our city. Please consider the many ongoing dangers, pollutants and problems of building a large 4-story apartment complex at Hole 16.

Thank you,

Lisa Cooper  
CMR resident

I296-1

I296-2

I296-3

I296-4

I296-5

I296-1

The City acknowledges the comment and notes it provides an introduction to the comments that follow.

I296-2

Air quality is discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**.

Greenhouse gas emissions were addressed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Greenhouse gas emissions were determined to be less than significant. Refer to **Master Response 8**. The comment addresses subject areas, which received analysis in the Draft EIR.

I296-3

Noise is discussed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

I296-4

Traffic and traffic safety were addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Emergency services were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to emergency services, including fire and police services and facilities, were determined to be less than significant. The comment addresses subject areas, which received analysis in the Draft EIR.

**I296-5** Health and safety issues are discussed in Section 5.8, Health and Safety, of the Draft EIR. Health and safety related impacts were determined to be less than significant. Other topics that generally relate to health and safety include air quality, greenhouse gas emissions, geologic conditions, transportation/circulation, water quality, and wildfire. Refer to **Master Response 7** regarding air quality, **Master Response 8** regarding greenhouse gas emissions, **Master Response 3** regarding transportation/circulation, and **Master Response 5** regarding wildfires. Also refer to **Response to Comment O2-7** regarding public safety. These subject areas received analysis in the Draft EIR.

Comment Letter I297

From: Rob and Nanette Tennant <nanny\_rob@hotmail.com>  
Sent: Saturday, February 6, 2021 3:58 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] Opposition to The Trails in Carmel Mountain Ranch

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Hello,

I am a homeowner in Carmel Mountain Ranch. I am writing to you to express my deep concern and opposition to the proposed building of 1200 units (known as The Trails at Carmel Mountain Ranch, Project Number 652519/SCH No. 2020039006) in our master planned community.

I own a home at 12295 Cornwallis Square. San Diego, CA 92128. I purchased it in 2003 because I wanted to raise my sons in a community that was well planned out and that had great schools, shopping, parks and very importantly, lots of open space. My home backs up to the former golf course. I have absolutely loved having open space as my backyard.

Over the years we have seen the traffic continue to increase. You can hardly get a parking spot now if you go to the shopping center on a weekend. 1200 new families moving into the neighborhood would make this situation much worse. During holiday times Carmel Mountain Road is jam packed with traffic. We simply cannot handle any more cars on our roads.

I have seen the schools become full with new homeowners forced to enroll their children in schools that were not in their immediate neighborhood. The building of these units would wreak havoc on our already overflowing local schools. There just isn't space at the schools to accommodate an increase in 25% more homes.

In the last 17 years I have evacuated my home twice due to nearby wildfires. Carmel Mountain Ranch lies in a Very High Fire Severity Zone. In event of a required evacuation the time needed due to increased traffic could be devastating. Lives could be lost. We've seen the effects of climate change and global warming. Fires are increasing in number. Fires are increasing in size and severity. We cannot add another 25% of our current homes to the area.

I am vehemently opposed to the increased noise and pollution that the building of The Trails at Carmel Mountain Ranch will bring with it. The air quality has been very unhealthy in the recent past. The extended amount of time needed to build these 1200 units will cause my husband's asthma and my son's allergies even worse.

In closing I would like to say that Carmel Mountain Ranch is a wonderful master planned community. The golf course was it's crown jewel. Now that it has closed I would like to see a plan that includes the retention of much more open space and park land. I agree we need more housing in San Diego. However, this current plan has far too many units for our small community.

Regards,  
Nanette Tennant  
Heritage Hills Homeowner since 2003

1

Response to Comment Letter I297  
297 Nanette Tennant  
February 7, 2021

- I297-1The City acknowledges the comment as an introduction to comments that follow.
- I297-2Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3** regarding transportation/circulation and parking.
- I297-3Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**.
- I297-4Wildfire hazards and emergency evacuation are discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Wildfire and evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.
- I297-5Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**. Air quality was discussed in Section 5.3, Air Quality and Odor, of the Draft EIR. Air quality impacts were determined to be less than significant. Refer to **Master Response 7**. The comment addresses subject areas, which received analysis in the Draft EIR.

**I297-6** Refer to **Response to Comment O2-11a** regarding open space.

Comment Letter I298

From: Yolanda M <charnkris@gmail.com>  
Sent: Monday, February 8, 2021 2:37 PM  
To: DSD EAS <DSDEAS@sanidiego.gov>  
Subject: [EXTERNAL] The Trails of Carmel Mountain Ranch Project No.652519/SCH 2020039006

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

To Whom It May Concern,

The New Urban plan of building 1200 units of multi-family, multi-story construction that is 60% rental is not compatible and not respectful with existing homes at Carmel Mountain Ranch due to density and scale.

This will disrupt lives of already well established community of over 15,000 residents and businesses.

It will change the culture and value of the existing development forever.  
The Trails Project will result in the destruction and character of the community,  
loss of open space and parkland, and massive increases of GHG exacerbation, climate change and air pollution.

It will cause massive environmental damage, hinder evacuation issues and safety causing clogged evacuation routes for additional 3,180 residents and their vehicles. with tremendous traffic gridlock.

New development will exacerbate an already existing traffic congestion on Eastbourne Rd, and Waverly Downs Way during school days and increases delay and travel time.

It will cause massive stress on schools, libraries and infrastructures.  
The trails will create existing homeowners safety, security, noise, and privacy issues.

The New Urban Project will be completely separate from the Master Planned community guidelines of the existing HOA.

Because of the stated issues and concern above, I strongly voice my rejection of the Trails Project at Carmel Mountain Ranch.

Respectfully yours,

Yolanda Mendiola  
(homeowner at CMR)  
14894 Waverly Downs Way  
San Diego, Ca 92128

I298-1

Response to Comment Letter I298  
298 Yolanda Mendiola  
February 8, 2021

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project’s impacts would be considered less than significant. Refer to **Master Response 2**. Refer to **Response to Comment 02-11a** regarding open space.

Air quality is discussed in Section 5.3, Air Quality and Odor, and greenhouse gas emissions are discussed in Section 5.7, Greenhouse Gas Emissions, of the Draft EIR. Air quality and greenhouse gas emissions impacts were determined to be less than significant. Refer to **Master Response 7** and **Master Response 8**.

Emergency evacuation is discussed in Section 5.19, Wildfire, and in Section 5.8, Health and Safety, of the Draft EIR. Evacuation-related impacts were determined to be less than significant. Refer to **Master Response 5**.

Traffic is discussed in Section 5.2, Transportation/Circulation, of the Draft EIR. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

I298-1



Schools and libraries were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Impacts to library facilities were determined to be significant and unavoidable. Refer to **Master Response 6**.

Utility infrastructure is discussed in Section 5.15, Public Utilities, of the Draft EIR. The Draft EIR determined the project would result in less than significant utility infrastructure impacts with mitigation incorporated. Proposed roadway improvements are discussed in Chapter 3, Project Description, of the Draft EIR. Refer to **Master Response 3** for additional information.

Noise was addressed in Section 5.11, Noise, of the Draft EIR. Noise impacts were determined to be less than significant with mitigation incorporated. Refer to **Master Response 4**.

Privacy is not an issue that is required to be analyzed under CEQA or based on the City's CEQA Significance Thresholds. However, site design would include buffers, setbacks, specific building articulation, and landscape features to help diminish potential privacy issues. Refer to **Response to Comment O2-7** regarding public safety. The comment addresses subject areas, which received analysis in the Draft EIR.

Comment Letter I299

Response to Comment Letter I299

299 Valerie Thompson

February 7, 2021

Valerie Thompson  
14004 Chacarita Creek Rd  
San Diego, CA 92128

E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501, San Diego, CA 92101  
[DSDEAS@SanDiego.gov](mailto:DSDEAS@SanDiego.gov)  
Project Name – The Trails at Carmel Mountain Ranch  
Project Number 652519/SCH No. 2020039006  
February 6, 2021

Dear Ms. Shearer-Nguyen and San Diego City Council:

I write to you with serious concerns about the proposed Trails at Carmel Mountain Ranch Project as submitted. I am an original Carmel Mountain Ranch homeowner since 1986, and my home is adjacent to the Carmel Mountain Golf Course. My educational background, a B.S. (UC Davis) and M.S. (SDSU) in Animal Behavior, together with my professional experience (25 years at the San Diego Zoo and 18 years with the San Diego County Office of Education) make me especially qualified to assess the environmental concerns I have with the detrimental effect the Project will have on the green space in the community. While at the Zoo, I was involved in a number of international conservation projects, including acting as the global Species Survival Plan Coordinator for Tree Kangaroos, and conducting an extensive habitat assessment in Australia which resulted in the US Fish and Wildlife Service listing the Koala as a Threatened species. At SDCOE, I have taught environmental science to all age groups, and currently work as Outdoor Educator at Cuyamaca Outdoor School. I feel much of the needed review here is common sense, though, and it is unfortunate that the simple facts need to be couched in a multi-paged complex technical document that most of the community will be disinterested in sorting through. There is a typo on page 662 by the way. Did you notice it? If I may be so bold, the document preparers may want to correct their EIR document template.

As a community member and long term homeowner, it is clear to me that the Project violates many provisions of the California Environment Quality Act (CEQA), including that it is distinctly out of character with the community of Carmel Mountain Ranch (CMR) as defined in the CMR Master Plan. As stated in the EIR, the Carmel Mountain Master Plan, approved by the City of San Diego, states: "The golf course that will meander through Carmel Mountain Ranch will provide a visual recreational amenity for the community, as well as an attractive separation between the various residential neighborhoods. The separation ...will provide screened neighborhood units." The environmental impacts of the Trails development as proposed include significant loss of open space

I299-1

I299-2

I299-1

The City acknowledges the comment as an introduction to comments that follow.

I299-2

Impacts related to neighborhood character are discussed in Section 5.17, Visual Effects/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**. Also refer to **Master Response 1** and Table 5.1-2 of the Draft EIR regarding the project's consistency with the General Plan. The project was determined to be consistent with the General Plan. The comment addresses subject areas, which received analysis in the Draft EIR.

Ms. Shearer-Nguyen and San Diego City Council  
February 6, 2021  
Page 2

and parkland, and proceeding with the Project as is (1200 three to four story units and over 3,000 new residents) also results in a myriad of other problems. As stated in the EIR, "implementation of the project would result in significant impacts related to the following issue areas: biological resources, transportation, historical resources, noise, population and housing, public services (libraries), public utilities, and tribal cultural resources." As also stated, even with mitigation measures, the development continues to have significant impact on transportation, population and housing. When we purchased our home, the CMR Master Plan stipulated preservation of natural open space and topography. Preservation of existing open space and current zone classification is consistent with the City of San Diego Land Use and Community Planning Element, and the State of California Senate Bill 375, requiring that California not build large housing projects on open space and park land. The EIR itself admits that "the Project would directly induce substantial unplanned population growth based on the currently adopted Housing Element (City of San Diego 2013) ...Therefore, cumulative impacts to population and housing would be cumulatively significant and unavoidable." Is this the new gold standard for approving new housing? In addition to these consequences, does San Diego really benefit by destruction of potentially rich habitat supporting biodiversity?

With regard to the loss of green space, in looking over the EIR Biological Technical Report, there is a disconcerting view that the habitat for wildlife is only worth preserving if it is "undisturbed" or native vegetation, which was identified as being only 8% of the area proposed for development. The implied view is that "disturbed" habitat is completely dispensable for destruction from a conservation standpoint. While it is ideal to have green space consisting only of native habitat, this is unfortunately not the case for the majority of San Diego County. There is, for example, a large hawk nest in an African Flame Tree on the Golf Course. Is this massive and healthy tree not worthy of protection because it is not native to San Diego, in spite of providing much needed shade, shelter, and food for threatened native mammals, reptiles, birds and insects?

Equally concerning is the implied view that it is okay to destroy even existing native habitat if it is "outside of the breeding season," and that protected bird species nests can even be destroyed as long as they are not "active" with eggs or chicks. Technically then, a nest can be destroyed if the female has not yet laid her eggs, and there is no regard for the multitude of bird species that use the same nests from year to year. Even though it is well documented elsewhere and confirmed in the EIR that sensitive bird species would be significantly impacted by a mere 300 ft buffer zone between nesting sites and construction activities/human activity, that is the stipulated plan for protection "if necessary." It is also of concern that only 15 bird species were observed or suspected to be present (Appendix B) by the Dudek biological surveyors, with three of these legislatively protected (Bell's vireo, Cooper's hawk, Yellow warbler). I personally have confirmed observations of well over 30 different bird species in the CMR Golf Course habitat in the past year, including a rare Golden Eagle juvenile (see photo). Examining this species' habitat requirement alone, it is well documented that proximate human activities lead to nest and territory

↑ I299-2  
Cont.  
I299-3  
I299-4  
I299-5  
I299-6  
I299-7  
↓

**I299-3**

The City acknowledges the comment and notes it restates information contained in the Draft EIR and does not raise an environmental issue within the meaning of CEQA.

**I299-4**

Refer to **Master Response 1** regarding land use consistency. In addition, refer to **Response to Comment O1-11** regarding SB 375 consistency.

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The proposed project's impacts on biological resources were determined to be less than significant with mitigation incorporated. The comment addresses subject areas, which received analysis in the Draft EIR.

**I299-5**

Comment noted. Refer to **Response to Comment I299-4**.

**I299-6**

The City acknowledges the comment and notes it provides general statements pertaining to wildlife species. Refer to **Response to Comment I299-4**.

**I299-7**

Biological resources are discussed in Section 5.4, Biological Resources, of the Draft EIR. The Draft EIR included mitigation measure **MM-BIO-1**, which reduces impacts to special-status wildlife species to a less than significant level. The 300-foot buffer was developed by the City of San Diego as a measure to ensure that all development adheres to grading restrictions identified in their Land Development.

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February 6, 2021  
Page 3

abandonment in Golden Eagles, and that we are losing this species' territories at an alarming rate (San Diego County Bird Atlas, P. Unitt, 2004). Golden Eagles are protected under the same Multiple Species Conservation Plan (MSCP) as mentioned in the EIR for the Cooper's Hawk, Bell's Vireo and Yellow Warbler, but Golden Eagles need a much larger undisturbed buffer zone, maintaining home ranges or territories that may be as large as 77 square miles. To only consider 300 ft. of buffer space (EIR p. 12151) between construction areas and nesting areas for any of these threatened birds as adequate protection is, at best, ill-advised. Even the EIR states that this results in the "edge effect," where disruption to wildlife can easily occur directly and indirectly from proximate human activities. As learned by the near extinction of the California Gnatcatcher (also noted to be present on the CMR Golf Course in the EIR Dudek Survey Report), contiguous habitat is critical to survival of some of the rarest of San Diego County's native species. Creating a patchwork of habitat within open space dotted by developments is the death knoll for many animals who need undisturbed continuous corridors of habitat.

For the Dudek Surveyors to indicate that the CMR Golf Course should not be considered as a wildlife corridor because it is surrounded by chain link fence and residential areas is extremely short-sighted in light of the fact that the shoddy temporary fencing installed by the Golf Course Owner after course closure is riddled with gaps, and while obviously not a barrier for birds and bats, it is also easily penetrable by terrestrial wildlife, as evidenced by regular sightings by community members of bobcats, raccoons and coyotes moving from one fairway to the next. I have also observed animals using the golf cart trail tunnels to move easily across transects. It is noteworthy that Dudek Surveyors only conducted their minimal data collection in the daytime over the course of 4 days within a month's time, for a total of 14.5 hours. The EIR even admits that the biological survey taken is limited since it was completed over such a short period of time and only in daylight hours. The biological survey was taken in the hottest month of the year, while in the cooler months coyotes are ubiquitous and Chicarita Creek comes alive with ducks, egrets, and so many Pacific Tree Frogs it can be difficult to carry on a conversation at dusk in adjacent neighborhoods. It is interesting that in the summary of sensitive wildlife potentially occurring within the project Site (Appendix D) that many species are noted as "not expected to occur" and yet these same species are listed in the same paragraph as having "known occurrences" within the region and/or vicinity. It seems quite possible that the surveyors were underestimating how many species actually were occupying the designated site before the data collection, suggesting that habitat quality may be more suitable than had been predicted.

I propose that more complete biological survey be conducted of the area, perhaps by a different company, that includes variable times of day and across seasons, rather than only 14.5 hours over the course of one summer month. Based on the results of the more extensive survey, it might be worth considering including at least a portion of the Golf Course footprint within the existing nearby Multi-Habitat Planning Area (MHPA), since one is located only a quarter mile away. A solid Multi

**1299-8**

The Biology Report states that portions of the project area could be used for local wildlife movement (see Biology Report Section 3.2.7 for additional information). As stated therein, smaller urban wildlife could potentially use these areas of the tributary for live-in habitat and foraging, but movement would be constrained by development and lack of vegetation coverage.

The MHPA of the MSCP was designed to include key biological core and linkage areas within the City (City of San Diego 1997). The proposed project site is not within the designated MHPA and is determined not to be a biological core or linkage area. The MHPA boundary occurs approximately 0.25 miles southeast of the proposed project site and is not adjacent to the project site (Biology Report Figure 1).

**1299-9**

Comment noted.

1299-7  
Cont.

1299-8

1299-9

Ms. Shearer-Nguyen and San Diego City Council  
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Page 4

Species Conservation Plan (MSCP) is imperative to preserve San Diego County's biological diversity, and it would be a benefit to include the precious existing green space in Carmel Mountain Ranch, based on not only what species utilize the Golf Course habitat year round, but also for those passing through, on migratory routes or for hunting grounds. If, for whatever reason, development must occur on this site, please consider scaling down the multi-story densely-planned housing proposed in the Trails Project. More consistent with the Carmel Mountain Ranch Community Plan would be 150-200 one or two story single family and attached homes. With adequate planning, it is potentially feasible to accomplish this without massive environmental impact, and 15% of these homes could be categorized as affordable. As clearly stated in the EIR, the reduced scope of the "Alternate Plan" submitted barely mitigates the impacts known to exist for the larger plan, so this is also unacceptable. While the EIR suggests the Project is providing 112 acres of open space and parkland, upon closer review of the plan, the Sierra Club has confirmed that the Project would actually result in the reduction of 52 acres of open space and they suggest approving the "no project alternative" until the existing deficient EIR is rewritten and resubmitted. I respectfully support the Sierra Club's recommendation, and encourage you to do the same.

Sincerely,

Valerie Thompson

#### References Cited

Unitt, P. 2004. San Diego County Bird Atlas. Online (Google Earth) version. Proceedings of the San Diego Society of Natural History, no. 39. San Diego, California: San Diego Natural History Museum. Accessed March 30, 2013. <http://www.sdnhm.org/science/birds-and-mammals/projects/san-diego-county-bird-atlas/>.

City of San Diego. 1997. City of San Diego Final MSCP Subarea Plan. Prepared by the City of San Diego Community and Economic Development Department. March 1997. <https://www.sandiego.gov/sites/default/files/legacy/planning/programs/mscp/pdf/subareafullversion.pdf>.

City of San Diego. 2013. General Plan Housing Element 2013–2020. March 4, 2013. <https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/heu/pdf/housingelementfull.pdf>.

**I299-10** Refer to **Master Response 10** regarding the Draft EIR's alternatives analysis.

**I299-11** Comment noted.

I299-9  
Cont.

I299-10

I299-11

Ms. Shearer-Nguyen and San Diego City Council  
February 6, 2021  
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Photograph Attachments:

Golden Eagle Photo credit (1-3): John Donnelly, Carmel Mountain Golf Course Hole 3, January 17, 2021. Wingspan estimated 5-7 ft.

Red Shouldered Hawk Photo credit (4): John Donnelly, Carmel Mountain Ranch Golf Course Hole 3, January 17, 2021.

Giant Egret Photo credit (5): Valerie Thompson, Carmel Mountain Ranch Golf Course, May 31, 2020.

Coyote Photo credit (6): Valerie Thompson, Carmel Mountain Ranch Golf Course Hole 3, January 8, 2021.

Sunset view photo credit (7): Valerie Thompson, Carmel Mountain Ranch Golf Course Hole 6, February 7, 2021. Looking west at State 56 and the ocean. Imagine a 4 story apartment building right in the middle of the view. Oh, right, there are no views or vistas that will be lost with this development. Just read the EIR.

I299-11  
Cont.

Ms. Shearer-Nguyen and San Diego City Council  
February 6, 2021  
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Cont.

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Cont.



Ms. Shearer-Nguyen and San Diego City Council  
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Ms. Shearer-Nguyen and San Diego City Council  
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I299-11  
Cont.

Comment Letter I300

Response to Comment Letter I300

300 Sonia Caskey

February 2, 2021

I300-1

Impacts related to traffic were addressed in Section 5.2, Transportation/Circulation, of the Draft EIR. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

RECEIVED

FEB 02 2021

Development Services

Sonia Caskey  
13635 Holly Oak Way  
Poway, CA  
92064  
1/27/2021

E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501,  
San Diego, CA 92101

Re: Trails at Carmel Mountain Ranch, Project #652519

Dear Ms. Shearer-Nguyen,

Please accept this letter as my objection to the proposed development of the Trails at Carmel Mountain Ranch. My objection is due to the already high density of homes and excess of traffic in the area.

I have owned a house on Werris Creek Lane, just a block from Highland Ranch Elementary School, for the last decade. It is a lovely family community, but already fairly densely populated. The streets within the housing areas become exceedingly clogged with traffic during school pick up and let out times. However, the worst traffic is in and around the shopping areas of Carmel Mountain Road and World Trade Drive. The high volume of cars and lack of parking makes some of those shopping areas, especially around Ralph's and Home Depot, very dangerous and difficult. Please do not add to this congestion even further with such a large influx of new high density housing.

Thank you,

  
Sonia Caskey

I300-1

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Comment Letter I301

Response to Comment Letter I301  
301 Jacqueline Weir  
February 2, 2021

January 24, 2021

E. Shearer-Nguyen, Environmental Planner  
City of San Diego Development Services Center  
1222 1st Avenue, MS 501  
San Diego, CA 92101

RECEIVED  
FEB 02 2021  
Development Services

Via e-mail to DSDEAS@sandiego.gov

RE: (Carmel Mountain Ranch) Trails at Carmel Mountain Ranch / Project No. 652519

Dear Ms. Shearer-Nguyen and City Council Members:

Regarding project no 652519 there are significant concerns that me and my family have regarding this proposed new development and the Environmental Impact Report (EIR) does not adequately address these concerns.

Community Character

This development is a plan to build up to 1,200 units. As a homeowner of 21 years in Carmel Mountain Ranch and a very tight knit community where neighbors know each other I would suggest a more modest project of 250 or less single family and/or attached homes. This would fit better with the community character of Carmel Mountain Ranch whereby approximately 80% of the housing in CMR is single family homes. Reducing the quantity of units would also maintain more open space.

Open Space

In the EIR section 16. Loss of land designated as parkland. The EIR quotes the SD general plan that states: "The project site is designated Park, Open Space, and Recreation in the General Plan." However, this development does not maintain the Open Space that currently exists and in fact consumes the majority of open space. In fact, this project would result in the reduction of 52 acres of open space. The EIR violates Senate Bill 375 that requires that California preserve open space and not build large housing projects on open space and park land. San Diego's new Parks Master Plan requires that San Diego provide thriving recreational spaces, allow for flexibility and innovation to provide unique recreational opportunities and prioritize investments in parks. Building new development on current park land or open space is not in the best interest of San Diego or the environment.

Page 1 of 3

I301-1

The City acknowledges the comment letter and notes it is a copy of **Comment Letter I1** from the same commenter. Refer to **Response to Comment Letter I1**.

I301-1



Climate Change

I have reviewed the 2015 Climate Action Plan (Our Climate Our Future) that requires developers to incorporate planning-related adaptation strategies (page 59 of the Plan) such as "...designating land for a full range of uses, including open spaces and high-density areas where appropriate." The Plan also requires "San Diego Green Streets" grassy swales and infiltration basins" as Green Spaces serve as a climate change adaptation resource where they can alleviate the heat island effect and potentially reduce the impact of flooding" pages 62-63 of the Plan. The development plans described in Project No. 652519 are in conflict with development of the scale proposed (up to 1,200 multi-family units).

Fugitive Dust and Valley Fever

I am very concerned about the health hazards related to dust, microbes, and Toxic Air Contaminants that will be emitted during this project. CMR is a mountainous area and this project proposes significant grading of earth in order to build these structures.

Valley Fever is a serious and sometimes fatal lung infection known as coccidioidomycosis which is often associated with grading and earthmoving. Some people experience a chronic cough; others can be stricken for years into such a limited capacity as to be bedridden by the infection. The operation of a construction site completely surrounded by residents in an area where Valley Fever occurs increases the rate of exposure and threatens those frequently outdoors, especially seniors and children.

EIR Section 5.3 indicates that "fugitive dust emissions are not anticipated" but this is an erroneous statement. Earth will need to be graded throughout much of The Trails project and this will emit dust. I recommend that there be new source review requirements for the dust and air contaminants that are subject to SDAPCD Rule 1200. The EIR states: "Development of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM10 and PM2.5 emissions. The proposed project would be subject to SDAPCD Rule 55, Fugitive Dust Control. This rule requires that the proposed project take steps to restrict visible emissions of fugitive dust..." Amazingly the EIR reaches an erroneous conclusion: "Maximum daily overlap of construction and operation would not exceed the operational emissions threshold or the 100 pounds per day threshold of PM10. Impacts would be



I301-1  
Cont.

less than significant. No mitigation would be required". This is NOT a logical conclusion and I am very concerned about the respiratory health of myself and my neighbors in CMR.


Greenhouse Gas Emissions

The development of The Trails will contribute to greenhouse gas emissions. The EIR on this project does not provide a mitigation plan. I have attended the HOA Golf Course Sub-Committee Meetings and San Diego City Council meetings. I have also reviewed California Environmental Quality Act (CEQA) that was established in 1970. CEQA provides support of citizens to challenge environmental damage posed by uncontrolled new development. Among several significant purposes of CEQA, it identifies ways that potential significant environmental impact(s) can be avoided or significantly reduced. CEQA works to prevent significant avoidable damage to the environment by requiring changes in the project through alternatives and mitigation. Per CEQA, new development must not have "Substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

Wildfires and Evacuation Routes

We need to consider the impact of climate change and increasing risk of wildfires in California and especially in San Diego County. I have lived in Carmel Mountain Ranch for 21 years. Through almost every fire in San Diego County in recent years, CMR has been in a mandatory evacuation zone as this area in general is a very high fire zone and this development would exacerbate an already poor wildfire evacuation situation. There have been 55 fires in the last century within San Diego County, two within the last couple of years. The EIR does not specify how emergency evacuations will be accommodated with The Trails being added into an already compacted community.

Thank you for considering the concerns of my family and the residents of CMR.

  
Jacqueline Weir  
11929 Tivoli Park Row, Unit #7  
San Diego, CA 92128-6502  
(858) 212-3595  
[Jaussie1@outlook.com](mailto:Jaussie1@outlook.com)

I301-1  
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Comment Letter I302

Response to Comment Letter I302

302 Betsy Holt  
February 8, 2021

**From:** Betsy Holt <betsyholt@mac.com>  
**Sent:** Monday, February 8, 2021 11:28 AM  
**To:** DSDEAS@sanidiego.gov  
**Subject:** [EXTERNAL] The Trails development

Hello,

I'm writing to convey my concern about the number of proposed units to be built in Carmel Mountain Ranch (CMR).

I've lived in CMR for 16 years. Even when the golf course was operating, the area was already congested, with overcrowded schools, a packed shopping center, and very busy parks, stores, and streets. My daughter has attended all the area schools, and pre-Covid, the traffic was a nightmare dropping her off and picking her up. What is the plan for accommodating all the extra families who will be moving to this area? This will bring significantly more traffic to the neighborhood schools and stores.

I'm not opposed to adding some homes. I understand that we have a housing crisis in San Diego. But I don't understand why anyone would think it is a good idea to cram 1,200 units into a community that is already very dense. The golf course itself is extremely narrow, and many parts of it cannot even be built on due to the grading of the slopes, which means the parts of the golf course that will be built on will be extremely crowded. There are hundreds of homes that ring the golf courses. These owners paid a premium, opting for patio-sized yards to have a tranquil view of the golf course. With this new plan, they will be looking at three-story apartment buildings just 50 feet away.

Building one-story units with some breathing room? That's reasonable. Building a few small two-story buildings in areas away from current backyards? That also seems reasonable. But proposing multistory buildings that are pushed up against people's backyards? It's a money grab from an Los Angeles builder and it's going to devalue our entire community.

I hope the city will put some reasonable parameters in place to prevent Carmel Mountain Ranch from turning into another concrete jungle like Mira Mesa or Los Angeles. Please, before you consider this plan from New Urban West, come to our community on a Saturday and see what the ramifications will be.

Thank you,

Betsy Holt

I302-1

I302-2

I302-1

Impacts related to traffic are addressed in Section 5.2, Transportation/Circulation. Transportation/circulation impacts were determined to be significant and unavoidable. Refer to **Master Response 3**.

Schools were addressed in Section 5.14, Public Services and Facilities, of the Draft EIR. Impacts to schools were determined to be less than significant. Refer to **Master Response 6**. The comment addresses subject areas, which received analysis in the Draft EIR.

I302-2

Potential impacts pertaining to compatibility with community character are addressed in Section 5.17, Visual Effect/Neighborhood Character, of the Draft EIR. The Draft EIR determined the project's impacts would be considered less than significant. Refer to **Master Response 2**.

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Comment Letter I303

From: Sassan Shahrokhinia <shahrokhinia@gmail.com>  
Sent: Wednesday, January 27, 2021 11:03 AM  
To: DSD EAS <DSEAS@sanidiego.gov>; Sassan Shahrokhinia <shahrokhinia@gmail.com>  
Subject: [EXTERNAL] Carmel Mountain Ranch development NSW comments

**\*\*This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.\*\***

Dear E. Shearer-Nguyen (Environmental Planner), I would like to go on record that myself and all of our neighbors strictly oppose the proposed development of the Carmel Mountain Ranch golf course by NSW development. This outrageous plan puts way too many units in this carefully planned community bringing in huge traffic problems and additional burdens on fire, police, schools and other city services without mitigation. I don't even see how one can mitigate road capacity and other services where no space exists in a mature planned community. Myself and all our neighbors fully support plans set forth by the CMR RCA. Thank you for your support.

Regards, Sassan Shahrokhinia  
11678 Chippenham Way, San Diego, CA 92128

I303-1

Response to Comment Letter I303  
303 Sassan Shahrokhinia  
January 27, 2021

I303-1

The City acknowledges the comment and notes it is a copy of **Comment Letter I24** from the same commenter. Refer to **Response to Comment Letter I24**.

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## References

- CAL FIRE (California Department of Forestry and Fire Protection). 2009. "Very High Fire Hazard Severity Zones in LRA: San Diego" [map]. 1:74,000. June 11, 2009. [https://osfm.fire.ca.gov/media/5969/san\\_diego.pdf](https://osfm.fire.ca.gov/media/5969/san_diego.pdf).
- Calflora. 2021. The Calflora Database. <https://www.calflora.org/app/taxon?crn=8336>. Berkeley, California: Accessed April 19, 2021.
- California Department of Forestry and Fire Protection (CalFire). 2020. Fire and Resource Assessment Program (FRAP) Viewer for Fire Hazard Severity Zones in California. Updated January 2021. <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>. Accessed June 2021.
- Caltrans (California Department of Transportation). 2013. *Transportation and Construction Vibration Guidance Manual*. Division of Environmental Analysis, Environmental Engineering, Hazardous Waste, Air, Noise, Paleontology Office. Sacramento, California. September 2013.
- CAPCOA (California Air Pollution Control Officers Association). 2017. *California Emissions Estimator Model (CalEEMod) User's Guide Version 2016.3.2* Prepared by Trinity Consultants and the California Air Districts. Accessed October 2017. [http://www.aqmd.gov/docs/defaultsource/caleemod/upgrades/2016.3/01\\_user-39-s-guide2016-3-1.pdf?sfvrsn=2](http://www.aqmd.gov/docs/defaultsource/caleemod/upgrades/2016.3/01_user-39-s-guide2016-3-1.pdf?sfvrsn=2).
- CARB (California Air Resources Board). 2015b. EMFAC2014 Web Database. Accessed September 2020. <https://arb.ca.gov/emfac/2014/>.
- CDFW (California Department of Fish and Wildlife). 2020. "State and Federally Listed Endangered and Threatened Animals of California." California Natural Diversity Database. CDFW, Biogeographic Data Branch. April 2, 2021. Accessed April 19, 2021.
- CEC (California Energy Commission). 2020. 2019 Building Energy Efficiency Standards Frequently Asked Questions. March. Accessed March 2021. [https://www.energy.ca.gov/sites/default/files/2020-03/Title\\_24\\_2019\\_Building\\_Standards\\_FAQ\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf).
- City of San Diego Planning Department. 2019. Transit Priority Areas per SB743. Revised February 2, 2019. <https://www.sandiego.gov/sites/default/files/transit-priority-map.pdf>. Accessed June 2021.
- City of San Diego. 1999. *Carmel Mountain Ranch Community Plan*. Revised December 1999.
- City of San Diego. 2005. Official Zoning Map, Grid Tile 41. November 2005. <https://www.sandiego.gov/sites/default/files/legacy/development-services/zoning/pdf/maps/grid41.pdf>.
- City of San Diego. 2008. *City of San Diego General Plan*. Adopted March 10, 2008. Accessed March 2020. <https://www.sandiego.gov/planning/genplan#genplan>.
- City of San Diego. 2011. General Plan and Community Plan Amendment Manual: A companion item to the General Plan. Development Services Department – Planning Division. August 24, 2011.
- City of San Diego. 2013. *General Plan Housing Element 2013–2020*. March 4, 2013. <https://www.sandiego.gov/>



sites/default/files/legacy/planning/genplan/heu/pdf/housingelementfull.pdf.

City of San Diego. 2017. "Office of Homeland Security." In *Fiscal Year 2017 Adopted Budget*, 331–337. <https://www.sandiego.gov/finance/annual/fy17>.

City of San Diego. 2019. Housing Inventory Annual Report. [https://www.sandiego.gov/sites/default/files/report\\_annualhousinginventory2019\\_final.pdf](https://www.sandiego.gov/sites/default/files/report_annualhousinginventory2019_final.pdf). Accessed March 2021.

City of San Diego. 2019a. "Transit Priority Areas per SB743" [map]. February 2019. Accessed March 2020. <https://www.sandiego.gov/sites/default/files/transit-priority-map.pdf>.

City of San Diego. 2020. *City of San Diego General Plan Housing Element March Draft 2021-2029*. [https://www.sandiego.gov/sites/default/files/he\\_marchdraftonscreenversion.pdf](https://www.sandiego.gov/sites/default/files/he_marchdraftonscreenversion.pdf).

City of San Diego. 2020. Transportation Study Manual. September 29, 2020.

County of San Diego. 2017. *Multi-Jurisdictional Hazard Mitigation Plan*. October 2017. Accessed April 1, 2020. [https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency\\_management/HazMit/2017/County-HazMit-Plan-2017-Sections-1-7-with-Appendixes-BOS-Approved.pdf](https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/HazMit/2017/County-HazMit-Plan-2017-Sections-1-7-with-Appendixes-BOS-Approved.pdf).

County of San Diego. 2018a. *Operational Area Emergency Operations Plan*. Unified San Diego County Emergency Services Organization and County of San Diego. September 2018.

County of San Diego. 2018b. "Evacuation." In *Operational Area Emergency Operations Plan*, Annex Q. Unified San Diego County Emergency Services Organization and County of San Diego. September 2018.

DTSC (California Department of Toxic Substances Control). 2012. Vapor Intrusion Public Participation Advisory. California Environmental Protection Agency, Department of Toxic Substances Control. February.

J.T. Kruer & Company. 2019. Construction Activity Assumptions for the Carmel Mountain Ranch Project. August 17, 2019.

Leppert Engineering Corporation. 2020. *Ad-Hoc Fee Study Discussion for Fees for Library Facilities—The Trails at Carmel Mountain Ranch*. December 10, 2020.

PUSD (Poway Unified School District). 2014. *District Maps and School Zones*. Revised May 2014. Accessed April 8, 2020. <https://www.powayusd.com/en-US/Departments/Business-Support/Planning/District-Map-and-School-Zones-May-2014.aspx>

San Diego Metropolitan Transit System. 2019. "Rapid Regional Connections." September 2019. Accessed April 30, 2020. [https://www.sdmts.com/sites/default/files/attachments/i-15\\_bus\\_service\\_sep2019.pdf](https://www.sdmts.com/sites/default/files/attachments/i-15_bus_service_sep2019.pdf).

SANDAG (San Diego Association of Governments). 2017. American Community Survey. Prepared for the City of San Diego Planning Department.

SANDAG. 2013c. "Series 13 Regional Growth Forecast: Carmel Mountain Ranch Community Planning Area." October 2013.

SDAPCD. 2017a. Regulation XII. Toxic Air Contaminates; Rule 1200: Toxic Air Contaminates – New Source Review. Accessed October 2017. [http://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules\\_and\\_Regulations/Toxic\\_Air\\_Cotaminants/ACPD\\_R1200.pdf](http://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Toxic_Air_Cotaminants/ACPD_R1200.pdf).

U.S. Census Bureau. 2019. "QuickFacts San Diego City, California. Population Estimates for July 1, 2019." Accessed April 13, 2020. <https://www.census.gov/quickfacts/sandiegocitycalifornia>.

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