State Route 94
Improvement Project

SAN DIEGO COUNTY, CALIFORNIA
DISTRICT 11 – SD – SR-94 (PM 13.4-14.2; 17.1-17.6; 19.2-20.2; 20.4-21.4)
EA 407700 (P ID 1114000067)
SCH# 2013081071

Final Environmental Impact Report

Prepared by the
State of California Department of Transportation

March 2016

This page intentionally left blank

General Information about This Document

For individuals with sensory disabilities, this document can be made available in Braille, in large print, on audiocassette, or on computer disk. To obtain a copy in one of these alternate formats, please call or write to Department of Transportation, Attn: David Nagy, Environmental Planning, 4050 Taylor Street, San Diego, CA 92110; (619) 688-0224 (Voice), or use the California Relay Service 1(800) 735-2929 (TTY), 1(800) 735-2929 (Voice) or 711.

This page intentionally left blank

SCH#2013081071
11-SD-94
EA 407700
PrjID:1114000067

State Route 94 (SR-94), in Unincorporated San Diego County from the SR-94/Jamacha Boulevard intersection to approximately 1,800 feet south of the Jamul Indian Village Tribal Lands.
(Postmiles: 13.4-14.2, 17.1-17.6, 19.2-20.2, 20.4-21.4)

State Route 94 Improvement Project
Final Environmental Impact Report

Submitted Pursuant to: (State) Division 13, California Public Resources Code

THE STATE OF CALIFORNIA
Department of Transportation

Responsible Agencies
County of San Diego
California Department of Fish and Wildlife

3/28/2016
Date of Approval

Laurie Berman
District Director
California Department of Transportation
CEQA Lead Agency

The following person may be contacted for additional information concerning this document:

State Route 94 Improvement Project Hotline
California Department of Transportation
4050 Taylor Street, MS 242
San Diego, CA 92110
(619) 688-4262

This page intentionally left blank

Summary

S.1 INTRODUCTION

The Department of Transportation (Caltrans) is the Lead Agency under the California Environmental Quality Act (CEQA) for the State Route 94 (SR-94) Improvement Project (Proposed Project), which is proposed and funded by the Jamul Indian Village (JIV) to improve various intersections along SR-94 and provide improved access to its Tribal Lands (the "JIV Tribal Lands") in unincorporated San Diego County, California. This Final Environmental Impact Report (Final EIR) analyzes environmental impacts associated with three build alternatives (the "Build Alternatives") designed to lessen traffic impacts that would result from the development of the JIV's approved gaming facility (the "JIV Gaming Development Project"), which is currently under construction on the JIV Tribal Lands. In addition to the three build alternatives, this Final EIR also analyzes a No Project Alternative. Responsible Agencies include San Diego County and the California Department of Fish and Wildlife (CDFW). This Final EIR includes responses to comments received on the Draft EIR and identifies the preferred alternative. If the decision is made to approve the Proposed Project, a Notice of Determination will be published for compliance with CEQA.

S.2 PROJECT LOCATION

The SR-94 Improvement Project begins in the north at the SR-94/Jamacha Boulevard intersection and ends approximately 1,800 feet south of the JIV Tribal lands. The Post Miles for the Proposed Project are identified as PM: 13.4-14.2; 17.1-17.6; 19.2-20.2; 20.4-21.4. Within this stretch of State Highway, for each of the Build Alternatives, proposed improvements would be made to five existing stand-alone intersections. In addition, each of the Build Alternatives includes a different access road (with all necessary associated improvements) leading from either SR-94 or Melody Road to the JIV Tribal Lands. The five SR-94 intersections include the SR-94/Jamacha Boulevard, SR-94/Jamacha Road, SR-94/Steele Canyon Road, SR-94/Lyons Valley Road, and SR-94/Maxfield Road intersections. The access road improvement alignments (Access Road Alignments) are located in an area beginning just north of the SR-94/Melody Road intersection and terminating in an area south of the JIV Tribal Lands. Each includes two additional intersections: SR-94/Melody Road would be improved under each Access Road Alignment and each of the three Access Road Alignments would include its own intersection improvements (at SR-94/Reservation Drive for Alternative 1, at SR-94/Daisy Drive for Alternative 2 and at Melody Road/new JIV Access Road Alignment for Alternative 3). The exact starting and ending locations for each Access Road Alignment is dependent on the Alternative (see Sections 1.4.2 through 1.4.4).

S.3 PROJECT OBJECTIVES

S.3.1 Purpose of the Project

The purpose of the Proposed Project is to provide access and highway improvements along the SR-94 that would mitigate traffic impacts from the JIV gaming development. The Proposed Project Objectives include:

a. Provide appropriate access to and from SR-94 and the approved JIV Gaming Development Project.

b. Lessen direct traffic impacts caused by the JIV Gaming Development Project on SR-94.

c. Improve the geometric design of the main access between SR-94 and the JIV Gaming Development Project.

d. Improve the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road in a manner consistent with the SR-94 Transportation Concept Summary (TCS) and the 2050 RTP.

S.3.2 Need for the Project

Capacity and Transportation Demand

Traffic resulting from the JIV Gaming Development Project, which is currently under construction on the JIV Tribal Lands, would either directly cause operating conditions at various intersections along SR-94 to fall below acceptable levels (below LOS D), would add traffic to intersections currently operating below LOS D, or would contribute to a cumulative impact at SR-94 intersections. In addition to impacted intersections, the existing configuration of the Access Road to the JIV Tribal Lands needs to either be reconfigured or a new Access Road built to meet Caltrans standards. Once the JIV Gaming Development Project is completed in the spring of 2016, traffic would directly impact seven intersections along SR-94. Five of these intersections are located outside of the limits of the Access Road Alignments, while two are located within the limits of the Access Road Alignments. If these intersection/Access Road Alignment improvements are not in place, and the casino opens, operation of the JIV Gaming Development Project would result in a significant traffic impact to these facilities.

The level of service (LOS) for signalized intersections is defined in terms of delay. Level of service measure describes operational conditions within a traffic stream, generally in terms of

such factors as speed, travel time, freedom to maneuver traffic interruption and safety. Please see **Figure 1-3** for the LOS criteria for two-lane highways.

Currently, Proposed Project intersections operate at LOS C or better during weekday and Friday/Saturday peak periods (**Table 1-1**). The exception to this is Lyons Valley Road, which currently operates at LOS E and F levels. Each intersection would operate at LOS D or worse during either the weekday or during the Friday/Saturday peak period when JIV Gaming Development Project traffic is added to the existing roadway network. In addition, the SR-94/Reservation Road intersection would also operate at LOS D or worse with the inclusion of JIV Gaming Development Project traffic in the future.

Traffic volumes on SR-94 are projected to increase from 10,600 average daily trips (ADT) north of Melody Road and 7,500 ADT south of Melody Road, to 17,000 ADT north of Melody Road, and 13,000 ADT south of Melody Road in 2035. Per the Traffic Impact Study, the development of the JIV Gaming Development Project will result in an unacceptable LOS on SR-94 north and south of Melody Road, as well as an unacceptable peak hour LOS at the intersection of SR-94 and Melody Road, thus producing congestion and excessive delays.

Roadway Deficiencies

In addition to the significant LOS issues noted above, the Final Tribal Environmental Evaluation prepared for the JIV Gaming Development Project (Final Tribal EE, 2013) concluded that the existing geometric design of the SR-94/Reservation Road intersection, which is the main access to the JIV Tribal Lands, does not meet Caltrans standards. The intersection angle, horizontal alignment, shoulder width, and corner sight distance are non-standard.

S.4 PROJECT DESCRIPTION

The Final EIR analyzes three alternatives that provide improved access to the JIV Tribal Lands, and improve five stand-alone intersections (hereafter, "Build Alternatives"). The five stand-alone intersection improvements identified in Section S.2 are common features to each Build Alternative, while the design of the Access Road Alignment is unique to each Build Alternative. The Build Alternatives include Access Road Alignments as follows: (1) via the existing "Reservation Road," which connects the JIV Tribal Lands to SR-94, (2) via "Daisy Drive," which is located on the adjacent 4-acre parcel north of the JIV Tribal Lands, and (3) via a new roadway constructed from Melody Road south to the JIV Tribal Lands. Under Alternative 2 (the Daisy Drive Access Road Alignment), there are three build options analyzed. While using the same Daisy Drive access point to and from SR-94, the designed Access Road Alignment improvements along SR-94 vary from option to option under this Alternative. Under Alternative 3: Melody Road Access, a new segment of roadway would be constructed from Melody Road to the JIV Tribal Lands

"In addition to the Build Alternatives, a No Project Alternative is also considered in this Final EIR. Under the No Project Alternative, no improvements would be undertaken for either the stand-alone intersections or Access Road Alignment; however, future growth (including the JIV Gaming Development Project) is still assumed to occur[1]."

Table S-1 lists the physical improvements proposed for each Build Alternative. All improvements would be undertaken in unincorporated San Diego County. Two of the intersections proposed to be improved, SR-94/Jamacha Boulevard and SR-94/Jamacha Road, are located in the San Diego County Valle de Oro Community Plan Area, while the remaining intersections and Access Road Alignments proposed to be improved are located in the Jamul/Dulzura Subregional Plan Area.

S.5 SUMMARY OF ENVIRONMENTAL IMPACTS

Table S-2 presents the summary table of impacts for each alternative evaluated in this DEIR. **Appendix B** contains the Environmental Commitment Record, which includes proposed avoidance, minimization and mitigation measures designed to avoid/minimize potential impacts. The measures listed in Appendix B are hereby incorporated into this Summary section by reference. For detailed discussions of all impacts and mitigation measures, see the environmental analysis sections (Chapters 2 through 5).

As presented in this Final EIR, Alternative 4: No Project Alternative is the Environmentally Superior Alternative, since no permanent right-of-way (ROW) would be required and no construction related impacts would occur to habitat, Waters of the U.S./State, plant/animal species, and cultural resources. Additionally, Alternative 4 would not affect community character or visual resources as would the other Build Alternatives. CEQA requires that, should the No Project Alternative be identified as the environmentally superior alternative, the EIR must specify a development alternative that is environmentally superior to the other Build Alternatives (CEQA *Guidelines* Section 15126.6(e)(2)). In this case, Alternative 2: Option 3 is the Environmentally Superior Alternative. All permanent ROW and temporary construction easement requirements for the five intersections (common features of alternatives) evaluated for

[1] / On August 27, 2013, Jacob Appelsmith, then-Senior Advisor to Governor Brown, sent a letter to JIV Chairman Raymond Hunter (**Appendix C**). The letter reviews Mr. Appelsmith's understanding of the Tribe's efforts up to that date and its plans to mitigate the off-site traffic effects of the Gaming Development Project. Mr. Appelsmith then concludes that if the Tribe implements the planned mitigation measures, "applies for the necessary approvals from the State and County governments, and, prior to the opening day of the [Gaming Development] Project, deposits into an escrow account for the benefit of the responsible government agencies an amount equal to the amount estimated to construct traffic improvements (to be set forth in the CalTrans Encroachment Permits), plus the Tribe's fair share payments to the State and County to mitigate the Project's considerable traffic impacts, it will have made a good faith effort to mitigate off-Reservation impacts as required by the Compact." That same letter estimates the total cost for traffic mitigation to be $16,323,780. The Tribe's assistance with the preparation of this EIR is part of the Tribe's ongoing good faith efforts to obtain the necessary approvals to implement mitigation for the off-site traffic effects of the JIV Gaming Development Project. In light of Mr. Appelsmith's letter, it appears that, if JIV satisfies all the requirements specified in the letter, the JIV Gaming Development Project could potentially operate with or without the traffic improvements contemplated in this EIR actually being in place, and this circumstance would be represented by the No Project Alternative. In addition, it is conceivable that some, but not all, of the traffic improvements analyzed in this EIR would be approved and implemented because the Tribe may not successfully obtain all requisite approvals. If that were to occur, the physical effects would be between the No Project alternative and one of the build options.

Alternative 2: Option 3 would be the same as described for the other Build Alternatives. Additionally, all intersections improved under Alternative 2: Option 3 would operate at acceptable levels of service with the exception of SR-94/Jamacha Boulevard under Horizon Year (2035) conditions. Focusing on impacts related to the Access Road Alignments, Alternative 2: Option 3 would result in a measurable decrease in impacts to Multi-Species Conservation Plan (MSCP) lands, State Waters, and sensitive habitats/ vegetation communities when compared to the other Build Alternatives. Temporary impacts to sensitive habitat types would also be minimized under Alternative 2: Option 3. This is a result of the reduced Access Road Alignment footprint when compared to the other Build Alternatives.

S.6 COORDINATION WITH PUBLIC AND OTHER AGENCIES

Permits and Approvals Needed

The proposed improvements resulting from the Build Alternatives could require outside approval from several agencies including the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), CDFW, State Water Resources Control Board (SWRCB) and San Diego County. Federal Permits required could include a Section 404 Nationwide Permit, Section 7 Consultation with USACE, and consultation with USFWS with regards to MSCP impacts. State approvals needed would include enrollment in the SWRCB for a National Pollutant Discharge Elimination System (NPDES) General Permit, CDFW consultation for MSCP impacts, and issuance of a Streambed Alteration Agreement (SAA) from CDFW. Various approvals from San Diego County would be required as noted in **Table S-3** Permits and Approvals.

TABLE S-3
PERMITS AND APPROVALS

Agency	Permit/Approval	Status
USACE	Clean Water Act Section 404 Nationwide Permit	Approved Sept. 29, 2015
USFWS	Endangered Species Act Section 7 Consultation with USACE before issuance of Nationwide Permit	Pending
	Review/approval of a MSCP Amendment or Boundary Line Adjustment	Pending
SWRCB/RWQCB	Enrollment in the program for a NPDES General Permit for Storm water discharges associated with construction activity,	Pending
	Water quality certification under Section 401 of the Clean Water Act (CWA) in conjunction with USACE issuance of a Nationwide permit	Pending
CDFW	Review/approval of a MSCP Amendment or Boundary Line Adjustment	Pending
	Consultation with CDFW and Issuance of a SAA under Fish and Game Code Section 1600 et seq.	Pending
	CDFW approval of land conveyance to be used for access road ROW	Pending

TABLE S-3 cont.
PERMITS AND APPROVALS

San Diego County	San Diego County approval of encroachment permits to allow the construction of roadway, drainage and utility improvements within the County rights-of-way	Pending
	Review of MSCP and Biological Mitigation Ordinance mitigation implementation for those portions of the Proposed Project that conform to the MSCP land designations Approval of a MSCP Amendment or Boundary Line Adjustment for those portions of the Proposed Project that do not conform to the MSCP land designations	Pending
	County grading permits for work undertaken within San Diego County jurisdiction	Pending
	Prior to any grading activities for Alternative 3, the Proposed Project would need approval from San Diego County for an amendment to the Otay Mesa Specific Plan allowing for the reconfiguration of parcels to accommodate the Alternative 3 alignment	Pending
	Prior to any grading activities for Alternative 3, the Proposed Project would need approval from San Diego County for an exemption to Mobility Goal #, Policy #15 of the Jamul/Dulzura Sub regional Plan allowing for the connection of a commercial facility to Melody Road, which is a collective street	Pending
	Prior to any grading activities for Alternative 3, the Proposed Project would need approval from San Diego County for an amendment to the MSCP allowing for the proposed roadway	Pending
	Irrevocable Offer of Dedication for Caltrans Highway Purposes would be executed for roadway improvements	Approved pending execution

Consultation and Coordination with Public and Other Agencies

A Notice of Preparation (NOP) was mailed out to the public on August 23, 2013 to begin the CEQA public scoping process on the Proposed Project. The NOP was issued by the State Clearinghouse on August 26, 2013, and the review was completed on September 25, 2013. Comments received through October 11, 2013 were accepted and summarized in the SR-94 Improvement Project Scoping Report.

During the NOP comment period, Caltrans held a public information meeting on September 17, 2013 for the SR-94 Improvement Project at the Cottonwood Golf Club located at 3121 Willow Glen Drive in El Cajon, California. In attendance at the Public Information Meeting were a bilingual court reporter, as well as Caltrans and consultant Spanish translators. The public was invited to view informational displays of the Proposed Project and discuss the Proposed Project with Caltrans staff and their representatives. One hundred and thirty seven people from the surrounding community raised various concerns associated with the JIV Gaming Development Project. Facilities were available for the public to provide written/oral comments for the Proposed Project record.

During the scoping process, a total of 8 comment letters were received from public agencies/ groups, 91 individual comment letters were received from the general public, a hearing transcript including comments from 20 individuals and one comment letter was signed by 40 individuals. A total of 496 individual comments were submitted by public agencies, groups and individuals. Approximately 56% of the comments were traffic-related, with requests made to study additional County roads and SR-94 intersections. Community character comments were raised by the participating community with concern being the preservation of Jamul's rural character and quality of life. This concern was related more to the effects of the JIV Gaming Development Project than specific traffic improvements being proposed for the SR-94 Improvement Project. It should be noted that the vast majority of the comments (over 90%) were regarding the JIV Gaming Development Project, which was separately approved and is currently under construction. The next topical issue commented on was biological resources (approximately 9%), which came mostly from CDFW, USFWS and San Diego County. Impacts to the MSCP, wildlife corridors and road-kill were the primary Biological Resource issues raised.

Caltrans has held three Project Development Team (PDT) Meetings with a cross-section of County, State, and Federal agency personnel, as well as community members. The first of these meetings was held early in the process on November 8, 2013, at the Caltrans District 11 offices in San Diego County, California. The second meeting was held on January 28, 2014, while the third was held on June 5, 2014, also at the Caltrans District 11 office. Caltrans staff/consultants have also met with State/Federal agency personnel at the CDFW, USFWS and USACE throughout the process to discuss right-of-way and technical issues (impacts to water of the U.S., MSCP, etc.) related to the Proposed Project.

Consultation/coordination has included phone, e-mail and meetings with various agencies/groups during the course of preparation of the Final EIR including USACE, USFWS, CDFW, County of San Diego, San Diego Natural History Museum (SDNHM), South Coastal Information Center (SCIC), and Native American Heritage Commission (NAHC).

Caltrans publically noticed the July 13, 2015 release of the Draft EIR by mailing public notices and publishing a notice in the *San Diego Union Tribune*. The 45-day Draft EIR comment period extended from July 13, 2015 to August 27, 2015. A public hearing to allow the public an opportunity to provide input regarding the Draft EIR was held at the Cottonwood Golf Club located in El Cajon, California on August 5, 2015. Caltrans received numerous written and oral comments during the public comment period from public agencies, organizations, businesses and individuals (see tabular listing of commenters in Section 6.5 Public Review Period).

Comments and responses to comments are discussed in Chapter 6.0 of the Final EIR.

S.7 ISSUES TO BE RESOLVED AND AREAS OF CONTROVERSY

The intersections and Access Road Alignment improvements are proposed due to the planned growth in traffic that would be experienced from new development within the area, including (but not limited to) the JIV Gaming Development Project. The JIV has begun construction on the Gaming Development Project located on its Tribal Lands. Thus, impacts related to the construction and operation of the JIV Gaming Development Project are beyond the scope of this EIR, except to the extent that they are considered as part of the cumulative impact analysis.

Scoping comments were submitted inquiring about why other intersections impacted by the JIV Gaming Development Project were not included in the Proposed Project. Intersections included in the Proposed Project were identified as those facilities that were significantly impacted solely by traffic from the JIV Gaming Development Project. That is, these intersections operated acceptably prior to the JIV Gaming Development Project, but would operate unacceptably due solely to traffic originating from the JIV Gaming Development Project. Other intersections significantly impacted partially due to Gaming Development Project traffic and partially due to other planned growth not related to the JIV Tribal Lands are not part of this Proposed Project. The JIV plans to pay its fair share contribution to offset its contribution to the impact at those intersections, and would require CEQA clearance before their implementation.

TABLE S-1
SUMMARY OF PROJECT FEATURES

Location	Traffic Signal Modification	New Traffic Signal	Increase Storage Capacity at Median	Construct Additional Acceleration/ Thru lanes	Construct New Turning Lanes	Construct Retaining Walls	Restripe Existing Lanes	Install Bioswales	Upgrade Bus Stop
SR-94/ Jamacha Boulevard	✓						✓		
SR-94/ Jamacha Road	✓		✓		✓	✓		✓	
SR-94/ Steele Canyon Road	✓			✓		✓	✓	✓	✓
SR-94/ Lyons Valley Road		✓					✓		
SR-94/ Maxfield Road				✓		✓	✓	✓	✓
Alt 1: Reservation Road Access Alignment		✓		✓	✓	✓	✓	✓	✓
Alt 2: Daisy Drive Access Alignments		✓		✓	✓	✓	✓	✓	✓
Alt 3: Melody Road Access Alignment		✓		✓	✓	✓	✓	✓	✓

TABLE S-2
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
2.1 Land Use	Consistency with State, Regional, and Local Plans and Policies	Alt 1 would be consistent with RTP/RTIP; County GP, RJER LMP, HCWA LMP, and San Diego NWR CCR.	Alt 2: Opt 1 would be consistent with RTP/RTIP; County GP, RJER LMP, HCWA LMP, and San Diego NWR CCR.	Alt 2: Opt 2 would be consistent with RTP/RTIP; County GP, RJER LMP, HCWA LMP, and San Diego NWR CCR.	Alt 2: Opt 3 would be consistent with RTP/RTIP; County GP, RJER LMP, HCWA LMP, and San Diego NWR CCR.	Alt 3 would be inconsistent with the RTP/RTIP Healthy Environment Goal; Jamul/Dulzura Plan Land Use Goal, Conservation Goal, and Mobility Goal 3; Policy #15. Alt 3 would be consistent with MSCP, RJER LMP, HCWA LMP, and San Diego NWR CCR.	No Impact
	Park and Recreational Facilities	Alt 1 would not impact County, RJER, HCWA or San Diego NWA park/recreational facilities.	Alt 2: Opt 1 would not impact County, RJER, HCWA or San Diego NWA park/recreational facilities.	Alt 2: Opt 2 would not impact County, RJER, HCWA or San Diego NWA park/recreational facilities.	Alt 2: Opt 3 would not impact County, RJER, HCWA or San Diego NWA park/recreational facilities.	Alt 3 would not impact County, RJER, HCWA or San Diego NWA park/recreational facilities.	No Impact
2.2 Growth	Growth	Alt 1 would not result in significant growth inducing impacts.	Alt 2: Opt 1 would not result in significant growth inducing impacts.	Alt 2: Opt 2 would not result in significant growth inducing impacts.	Alt 2: Opt 3 would not result in significant growth inducing impacts.	Alt 3 would not result in significant growth inducing impacts.	No Impact
2.3 Community Character and Cohesion	Long-term Access Impacts	Alt 1 would not result in displacements of existing structures, or barriers within either the Valle de Oro or Jamul/Dulzura communities. Additionally, the proposed improvements would not permanently disrupt established routes or access to abutting land uses.	Alt 2: Opt 1 would not result in displacements of existing structures, or barriers within either the Valle de Oro or Jamul/Dulzura communities. Additionally, the proposed improvements would not permanently disrupt established routes or access to abutting land uses.	Alt 2: Opt 2 would not result in displacements of existing structures, or barriers within either the Valle de Oro or Jamul/Dulzura communities. Additionally, the proposed improvements would not permanently disrupt established routes or access to abutting land uses.	Alt 2: Opt 3 would not result in displacements of existing structures, or barriers within either the Valle de Oro or Jamul/Dulzura communities. Additionally, the proposed improvements would not permanently disrupt established routes or access to abutting land uses.	Alt 3 would not result in displacements of existing structures, or barriers within either the Valle de Oro or Jamul/Dulzura communities. Additionally, the proposed improvements would not permanently disrupt established routes or access to abutting land uses.	No Impact
	ROW Acquisition and Easements	ROW acquisition for Alt 1 total 6.59 acres. No relocation or related community impacts are expected from the temporary or permanent easements identified for Alt 1.	ROW acquisition for Alt 2: Opt 1 totals 6.81 acres. No relocation or related community impacts are expected from the temporary or permanent easements identified for Alt 2: Opt 1.	ROW acquisition for Alt 2: Opt 2 totals 6.50 acres. No relocation or related community impacts are expected from the temporary or permanent easements identified for Alt 2: Opt 2.	ROW acquisition for Alt 2: Opt 3 totals 3.78 acres. No relocation or related community impacts are expected from the temporary or permanent easements identified for Alt 2: Opt 3.	ROW acquisition for Alt 3 totals 12.06 acres. No relocation or related community impacts are expected from the temporary or permanent easements identified for Alt 3.	No Impact
	Long-term Visual Community Impacts	Alt 1 would contribute to the increased urbanization of the rural community	Alt 2: Opt 1 would contribute to the increased urbanization of the rural	Alt 2: Opt 2 would contribute to the increased urbanization of the rural	Alt 2: Opt 3 would contribute to the increased urbanization of the rural	Alt 3 would contribute to the increased urbanization of the rural community	No Impact

[1] / Includes impacts for Access Road Alignments and Non-Access Road Intersection features. Abbreviations are defined in **Appendix D** Terms and Acronyms.

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		character and cohesion of this area to one of a more built environment. This impact is considered less-than-significant with avoidance, minimization, and mitigation measures identified in Section 2.6.	community character and cohesion of this area to one of a more built environment. This impact is considered less-than-significant with avoidance, minimization, and mitigation measures identified in Section 2.6.	community character and cohesion of this area to one of a more built environment. This impact is considered less-than-significant with avoidance, minimization, and mitigation measures identified in Section 2.6.	community character and cohesion of this area to one of a more built environment. This impact is considered less-than-significant with avoidance, minimization, and mitigation measures identified in Section 2.6.	character and cohesion of this area to one of a more built environment. This impact is considered less-than-significant with avoidance, minimization, and mitigation measures identified in Section 2.6.	
	Long-term Noise-related Community Impacts	Noise, noise sensitive receptors in the vicinity of the non-access road intersection improvements would not be significantly impacted by traffic noise under Alt 1.	Noise, noise sensitive receptors in the vicinity of the non-access road intersection improvements would not be significantly impacted by traffic noise under Alt 2: Opt 1.	Noise, noise sensitive receptors in the vicinity of the non-access road intersection improvements would not be significantly impacted by traffic noise under Alt 2: Opt 2.	Noise, noise sensitive receptors in the vicinity of the non-access road intersection improvements would not be significantly impacted by traffic noise under Alt 2: Opt 3.	Noise, noise sensitive receptors in the vicinity of the non-access road intersection improvements would not be significantly impacted by traffic noise under Alt 3.	No Impact
	Construction Impacts	Implementation of the Alt 1 road improvements would result in temporary construction-related impacts in the study area during the anticipated nine-month construction period. Such impacts would be temporary and are not considered significant.	Implementation of the Alt 2: Opt 1 road improvements would result in temporary construction-related impacts in the study area during the anticipated nine-month construction period. Such impacts would be temporary and are not considered significant.	Implementation of the Alt 2: Opt 2 road improvements would result in temporary construction-related impacts in the study area during the anticipated nine-month construction period. Such impacts would be temporary and are not considered significant.	Implementation of the Alt 2: Opt 3 road improvements would result in temporary construction-related impacts in the study area during the anticipated nine-month construction period. Such impacts would be temporary and are not considered significant.	Implementation of the Alt 3 road improvements would result in temporary construction-related impacts in the study area during the anticipated nine-month construction period. Such impacts would be temporary and are not considered significant.	No Impact
2.4 Traffic	Existing Traffic Conditions Plus JIV Gaming and Proposed Project Conditions	All Proposed Project intersections would operate at an acceptable LOS under Alt 1. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 2: Opt 1. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 2: Opt 2. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 2: Opt 3. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 3. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Non-Access Road Intersections, the SR-94/Melody Road Intersection, and SR-94/Project Driveway would operate at LOS D or worse for at least one peak-hour period.
	Near Term (2015) with Proposed Project Traffic Conditions	All intersections would operate at an acceptable LOS under Alt 1. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 2: Opt 1. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 2: Opt 2. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 2: Opt 3. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Proposed Project intersections would operate at an acceptable LOS under Alt 3. Intersections would not be significantly impacted with the addition of Proposed Project improvements.	All Non-Access Road Intersections, SR-94/Via Mercado, SR-94/Cougar Canyon Road, SR-94/Jefferson Road, SR-94/Melody Road, SR-94/Project Driveway, and SR-94/Otay Lakes Road intersections would operate at LOS D or

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
							worse for at least one peak-hour period.
	Horizon Year (2035) with Proposed Project Traffic Conditions	Alt 1 would result in improved traffic conditions within the overall study area. Implementation of the Proposed Project would result in improved or similar traffic operations compared to the existing condition. With the exception of one intersection (SR-94/Jamacha Boulevard), future conditions would not adversely change with or without the Proposed Project.	Alt 2: Opt 1 would result in improved traffic conditions within the overall study area. Implementation of the Proposed Project would result in improved or similar traffic operations compared to the existing condition. With the exception of one intersection (SR-94/Jamacha Boulevard), future conditions would not adversely change with or without the Proposed Project.	Alt 2: Opt 2 would result in improved traffic conditions within the overall study area. Implementation of the Proposed Project would result in improved or similar traffic operations compared to the existing condition. With the exception of one intersection (SR-94/Jamacha Boulevard), future conditions would not adversely change with or without the Proposed Project.	Alt 2: Opt 3 would result in improved traffic conditions within the overall study area. Implementation of the Proposed Project would result in improved or similar traffic operations compared to the existing condition. With the exception of one intersection (SR-94/Jamacha Boulevard), future conditions would not adversely change with or without the Proposed Project.	Alt 3 would result in improved traffic conditions within the overall study area. Implementation of the Proposed Project would result in improved or similar traffic operations compared to the existing condition. With the exception of one intersection (SR-94/Jamacha Boulevard), future conditions would not adversely change with or without the Proposed Project.	All Non-Access Road Intersections, SR-94/Via Mercado, SR-94/Cougar Canyon Road, SR-94/Jefferson Road, SR-94/Melody Road, SR-94/Project Driveway, and SR-94/Otay Lakes Road intersections would operate at LOS D or worse for at least one peak-hour period.
	Construction Impacts	Daily haul and delivery truck traffic associated with Alt 1 construction would be nominal. Traffic along SR-94 (Campo Road) and along all local roadways surrounding the Proposed Project would remain open during all construction phases with the exception of construction activities along Melody Road. Emergency access would be provided during the construction of the Melody Road segment (approximately 6-months), including the bottomless culvert. The impact would be less-than-significant following implementation of TMP mitigation (see Section 2.4.4).	Daily haul and delivery truck traffic associated with Alt 2: Opt 1 construction would be nominal. Traffic along SR-94 (Campo Road) and along all local roadways surrounding the Proposed Project would remain open during all construction phases with the exception of construction activities along Melody Road. Emergency access would be provided during the construction of the Melody Road segment (approximately 6-months), including the bottomless culvert. The impact would be less-than-significant following implementation of TMP mitigation (see Section 2.4.4).	Daily haul and delivery truck traffic associated with Alt 2: Opt 2 construction would be nominal. Traffic along SR-94 (Campo Road) and along all local roadways surrounding the Proposed Project would remain open during all construction phases with the exception of construction activities along Melody Road. Emergency access would be provided during the construction of the Melody Road segment (approximately 6-months), including the bottomless culvert. The impact would be less-than-significant following implementation of TMP mitigation (see Section 2.4.4).	Daily haul and delivery truck traffic associated with Alt 2: Opt 3 construction would be nominal. Traffic along SR-94 (Campo Road) and along all local roadways surrounding the Proposed Project would remain open during all construction phases with the exception of construction activities along Melody Road. Emergency access would be provided during the construction of the Melody Road segment (approximately 6-months), including the bottomless culvert. The impact would be less-than-significant following implementation of TMP mitigation (see Section 2.4.4).	Daily haul and delivery truck traffic associated with Alt 3 construction would be nominal. Traffic along SR-94 (Campo Road) and along all local roadways surrounding the Proposed Project would remain open during all construction phases with the exception of construction activities along Melody Road. Emergency access would be provided during the construction of the Melody Road segment (approximately 6-months), including the bottomless culvert. The impact would be less-than-significant following implementation of TMP mitigation (see Section 2.4.4).	No Impact
	Pedestrian, Transit and Bike Facilities	Alt 1 improvements would not preclude the future establishment of pedestrian	Alt 2: Opt 1 improvements would not preclude the future establishment of	Alt 2: Opt 2 improvements would not preclude the future establishment of	Alt 2: Opt 3 improvements would not preclude the future establishment of	Alt 3 improvements would not preclude the future establishment of pedestrian	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		walkways, transit stops, or bike lanes. Share the road signs would be installed where necessary.	pedestrian walkways, transit stops, or bike lanes. Share the road signs would be installed where necessary.	pedestrian walkways, transit stops, or bike lanes. Share the road signs would be installed where necessary.	pedestrian walkways, transit stops, or bike lanes. Share the road signs would be installed where necessary.	walkways, transit stops, or bike lanes. Share the road signs would be installed where necessary.	
2.5 Utilities/ Emergency Services	Utilities	Construction under Alt 1 would require minor relocation of existing facilities including electrical, potable water, surface water drainage, natural gas, and overhead pole/telecommunication lines. No sewage line relocation would occur within the Proposed Project limits. Impacts to Utilities would be less-than-significant.	Construction under Alt 2: Opt 1 would require minor relocation of existing facilities including electrical, potable water, surface water drainage, natural gas, and overhead pole/telecommunication lines. No sewage line relocation would occur within the Proposed Project limits. Impacts to Utilities would be less-than-significant.	Construction under Alt 2: Opt 2 would require minor relocation of existing facilities including electrical, potable water, surface water drainage, natural gas, and overhead pole/telecommunication lines. No sewage line relocation would occur within the Proposed Project limits. Impacts to Utilities would be less-than-significant.	Construction under Alt 2: Opt 3 would require minor relocation of existing facilities including electrical, potable water, surface water drainage, natural gas, and overhead pole/telecommunication lines. No sewage line relocation would occur within the Proposed Project limits. Impacts to Utilities would be less-than-significant.	Construction under Alt 3 would require minor relocation of existing facilities including electrical, potable water, surface water drainage, natural gas, and overhead pole/telecommunication lines. No sewage line relocation would occur within the Proposed Project limits. Impacts to Utilities would be less-than-significant.	No Impact
	Emergency Services	The construction of Alt 1 improvements would require temporary closure of the right turn lane at SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections, while traffic at SR-94/Melody Road intersection would be temporarily interrupted. Implementation of a TMP (see Section 2.4.4) would ensure a less-than-significant impact.	The construction of Alt 2: Opt 1 improvements would require temporary closure of the right turn lane at SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections, while traffic at SR-94/Melody Road intersection would be temporarily interrupted. Implementation of a TMP (see Section 2.4.4) would ensure a less-than-significant impact.	The construction of Alt 2: Opt 2 improvements would require temporary closure of the right turn lane at SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections, while traffic at SR-94/Melody Road intersection would be temporarily interrupted. Implementation of a TMP (see Section 2.4.4) would ensure a less-than-significant impact.	The construction of Alt 2: Opt 3 improvements would require temporary closure of the right turn lane at SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections, while traffic at SR-94/Melody Road intersection would be temporarily interrupted. Implementation of a TMP (see Section 2.4.4) would ensure a less-than-significant impact.	The construction of Alt 3 improvements would require temporary closure of the right turn lane at SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections, while traffic at SR-94/Melody Road intersection would be temporarily interrupted. Implementation of a TMP (see Section 2.4.4) would ensure a less-than-significant impact.	No Impact
2.6 Visual Resources/ Aesthetics	Long Term Impacts to Visual Resources	The Alt 1 improvements would have a less-than-significant impact at Non-Access Road Intersections. The Access Road Alignment would result in a high change, which would be mitigated to a less-than-significant level.	The Alt 2: Opt 1 improvements would have a less-than-significant impact at Non-Access Road Intersections. The Access Road Alignment would result in a high change, which would be mitigated to a less-than-significant level.	The Alt 2: Opt 2 improvements would have a less-than-significant impact at Non-Access Road Intersections. The Access Road Alignment would result in high change, which would be mitigated to a less-than-significant level.	The Alt 2: Opt 3 improvements would have a less-than-significant impact at Non-Access Road Intersections. The Access Road Alignment would result in high change, which would be mitigated to a less-than-significant level.	The Alt 3 improvements would have a less-than-significant impact at Non-Access Road Intersections. The Access Road Alignment would result in a high change, which would be mitigated to a less-than-significant level.	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
	Construction Impacts	Temporary construction impacts from Alt 1 would include temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours. Construction impacts would cease following completion of the Proposed Project. This is considered a less-than-significant visual impact.	Temporary construction impacts from Alt 2: Opt 1 would include temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours. Construction impacts would cease following completion of the Proposed Project. This is considered a less-than-significant visual impact.	Temporary construction impacts from Alt 2: Opt 2 would include temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours. Construction impacts would cease following completion of the Proposed Project. This is considered a less-than-significant visual impact.	Temporary construction impacts from Alt 2: Opt 3 would include temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours. Construction impacts would cease following completion of the Proposed Project. This is considered a less-than-significant visual impact.	Temporary construction impacts from Alt 3 would include temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours. Construction impacts would cease following completion of the Proposed Project. This is considered a less-than-significant visual impact.	No Impact
2.7 Cultural Resources	Cultural Resources	Impacts to historical resources would be avoided through implementation of ESAs. No impacts to known historical resources would occur as a result of activities under Alt 1.	Impacts to historical resources would be avoided through implementation of ESAs. No impacts to known historical resources would occur as a result of activities under Alt 2: Opt 1.	Impacts to historical resources would be avoided through implementation of ESAs. No impacts to known historical resources would occur as a result of activities under Alt 2: Opt 2.	Impacts to historical resources would be avoided through implementation of ESAs. No impacts to known historical resources would occur as a result of activities under Alt 2: Opt 3.	Impacts to historical resources would be avoided through implementation of ESAs. No impacts to known historical resources would occur as a result of activities under Alt 3.	No Impact
2.8 Hydrology and Floodplain	Construction Impacts to Hydrology	Given the minor amounts of additional impervious surface added under Alt 1, and the use of construction BMPs (see Section 2.9.4) , the potential for change in existing drainage patterns is considered less-than-significant.	Given the minor amounts of additional impervious surface added under Alt 2: Opt 1, and the use of construction BMPs (see Section 2.9.4), the potential for change in existing drainage patterns is considered less-than-significant.	Given the minor amounts of additional impervious surface added under Alt 2: Opt 2, and the use of construction BMPs (see Section 2.9.4), the potential for change in existing drainage patterns is considered less-than-significant.	Given the minor amounts of additional impervious surface added under Alt 2: Opt 3, and the use of construction BMPs (see Section 2.9.4), the potential for change in existing drainage patterns is considered less-than-significant.	Given the minor amounts of additional impervious surface added under Alt 3, and the use of construction BMPs (see Section 2.9.4), the potential for change in existing drainage patterns is considered less-than-significant.	No Impact
	Floodplain Impacts	The Alt 1 improvements would not result in an increase in base floodplain elevation, encroachment into a regulatory floodway, nor would it require a revision to a floodplain map. In addition, Alt 1 would not result in a risk to life or property or an adverse impact on natural and beneficial floodplain values. The proposed	The Alt 2: Opt 1 improvements would not result in an increase in base floodplain elevation, encroachment into a regulatory floodway, nor would it require a revision to a floodplain map. In addition, Alt 1 would not result in a risk to life or property or an adverse impact on natural and beneficial floodplain values.	The Alt 2: Opt 2 improvements would not result in an increase in base floodplain elevation, encroachment into a regulatory floodway, nor would it require a revision to a floodplain map. In addition, Alt 1 would not result in a risk to life or property or an adverse impact on natural and beneficial floodplain values.	The Alt 2: Opt 3 improvements would not result in an increase in base floodplain elevation, encroachment into a regulatory floodway, nor would it require a revision to a floodplain map. In addition, Alt 1 would not result in a risk to life or property or an adverse impact on natural and beneficial floodplain values.	The Alt 3 improvements would not result in an increase in base floodplain elevation, encroachment into a regulatory floodway, nor would it require a revision to a floodplain map. In addition, Alt 1 would not result in a risk to life or property or an adverse impact on natural and beneficial floodplain values. The proposed	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		improvements would not develop or alter existing floodplains and no impact would occur.	The proposed improvements would not develop or alter existing floodplains and no impact would occur.	The proposed improvements would not develop or alter existing floodplains and no impact would occur.	The proposed improvements would not develop or alter existing floodplains and no impact would occur.	improvements would not develop or alter existing floodplains and no impact would occur.	
2.9 Water Quality and Stormwater Runoff	Short-term Construction Related Water Quality Impacts	Based on the implementation of the SWPPP, the REAP and Caltrans' Storm Water Quality Handbook, Alt 1 specific water quality construction BMPs and erosion and monitoring/ sampling plans would be incorporated into the Proposed Project design consistent with the requirements of the General Permit. Potential construction impacts on water quality are considered less-than-significant.	Based on the implementation of the SWPPP, the REAP and Caltrans' Storm Water Quality Handbook, Alt 2: Opt 1 specific water quality construction BMPs and erosion and monitoring/ sampling plans would be incorporated into the Proposed Project design consistent with the requirements of the General Permit. Potential construction impacts on water quality are considered less-than-significant.	Based on the implementation of the SWPPP, the REAP and Caltrans' Storm Water Quality Handbook, Alt 2: Opt 2 specific water quality construction BMPs and erosion and monitoring/ sampling plans would be incorporated into the Proposed Project design consistent with the requirements of the General Permit. Potential construction impacts on water quality are considered less-than-significant.	Based on the implementation of the SWPPP, the REAP and Caltrans' Storm Water Quality Handbook, Alt 2: Opt 3 specific water quality construction BMPs and erosion and monitoring/ sampling plans would be incorporated into the Proposed Project design consistent with the requirements of the General Permit. Potential construction impacts on water quality are considered less-than-significant.	Based on the implementation of the SWPPP, the REAP and Caltrans' Storm Water Quality Handbook, Alt 3 specific water quality construction BMPs and erosion and monitoring/ sampling plans would be incorporated into the Proposed Project design consistent with the requirements of the General Permit. Potential construction impacts on water quality are considered less-than-significant.	No Impact
	Long-term Operational Water Quality Impacts	The downstream beneficial uses of the water bodies are not anticipated to be affected by Alt 1 improvements. because implementation of the BMPs described in Section 2.9.4 ensures that a less-than-significant would result.	The downstream beneficial uses of the water bodies are not anticipated to be affected by Alt 2: Opt 1 improvements because implementation of the BMPs described in Section 2.9.4 ensures that a less-than-significant would result.	The downstream beneficial uses of the water bodies are not anticipated to be affected by Alt 2: Opt 2 improvements because implementation of the BMPs described in Section 2.9.4 ensures that a less-than-significant would result.	The downstream beneficial uses of the water bodies are not anticipated to be affected by Alt 2: Opt 3 improvements because implementation of the BMPs described in Section 2.9.4 ensures that a less-than-significant would result.	The downstream beneficial uses of the water bodies are not anticipated to be affected by Alt 3 improvements because implementation of the BMPs described in Section 2.9.4 ensures that a less-than-significant would result.	No Impact
2.10 Geology/Soils/ Seismic/Topography	Seismic Hazards	The Alt 1 Project limits could be subject to severe ground shaking. Design measures address potential impacts from ground shaking and liquefaction. Expansive soils within the Project limits are considered low and a less-than-significant impact.	The Alt 2: Opt 1 Project limits could be subject to severe ground shaking. Design measures address potential impacts from ground shaking and liquefaction. Expansive soils within the Project limits are considered low and a less-than-significant impact.	The Alt 2: Opt 2 Project limits could be subject to severe ground shaking. Design measures address potential impacts from ground shaking and liquefaction. Expansive soils within the Project limits are considered low and a less-than-significant impact.	The Alt 2: Opt 3 Project limits could be subject to severe ground shaking. Design measures address potential impacts from ground shaking and liquefaction. Expansive soils within the Project limits are considered low and a less-than-significant impact.	The Alt 3 Project limits could be subject to severe ground shaking. Design measures address potential impacts from ground shaking and liquefaction. Expansive soils within the Project limits are considered low and a less-than-significant impact.	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
	Topography and Erosion	Major topographical features that are greater than 25% in slope and 50 feet in height would be preserved. The Alt 1 Project limits is not within a County designated area categorized as having high or moderate potential for unique geologic features, and do not encompass any areas designated as a federal National Natural Landmark. Alt 1 would have a less-than-significant effect on topography. Existing soils are not a significant constraint on development. Erosion from construction activities would be minimized and controlled through the implementation of BMPs (see Section 2.9.4). Alt 1 would not alter or divert the flow or course of any existing streams or drainages that would result in increased erosion or change the course of water flows.	Major topographical features that are greater than 25% in slope and 50 feet in height would be preserved. The Alt 2: Opt 1 Project limits is not within a County designated area categorized as having high or moderate potential for unique geologic features, and do not encompass any areas designated as a federal National Natural Landmark. Alt 2: Opt 1 would have a less-than-significant effect on topography. Existing soils are not a significant constraint on development. Erosion from construction activities would be minimized and controlled through the implementation of BMPs (see Section 2.9.4). Alt 2: Opt 1 would not alter or divert the flow or course of any existing streams or drainages that would result in increased erosion or change the course of water flows.	Major topographical features that are greater than 25% in slope and 50 feet in height would be preserved. The Alt 2: Opt 2 Project limits is not within a County designated area categorized as having high or moderate potential for unique geologic features, and do not encompass any areas designated as a federal National Natural Landmark. Alt 2: Opt 2 would have a less-than-significant effect on topography. Existing soils are not a significant constraint on development. Erosion from construction activities would be minimized and controlled through the implementation of BMPs (see Section 2.9.4). Alt 2: Opt 2 would not alter or divert the flow or course of any existing streams or drainages that would result in increased erosion or change the course of water flows.	Major topographical features that are greater than 25% in slope and 50 feet in height would be preserved. The Alt 2: Opt 3 Project limits is not within a County designated area categorized as having high or moderate potential for unique geologic features, and do not encompass any areas designated as a federal National Natural Landmark. Alt 2: Opt 3 would have a less-than-significant effect on topography. Existing soils are not a significant constraint on development. Erosion from construction activities would be minimized and controlled through the implementation of BMPs (see Section 2.9.4). Alt 2: Opt 3 would not alter or divert the flow or course of any existing streams or drainages that would result in increased erosion or change the course of water flows.	Major topographical features that are greater than 25% in slope and 50 feet in height would be preserved. The Alt 3 Project limits is not within a County designated area categorized as having high or moderate potential for unique geologic features, and do not encompass any areas designated as a federal National Natural Landmark. Alt 3 would have a less-than-significant effect on topography. Existing soils are not a significant constraint on development. Erosion from construction activities would be minimized and controlled through the implementation of BMPs (see Section 2.9.4). Alt 3 would not alter or divert the flow or course of any existing streams or drainages that would result in increased erosion or change the course of water flows.	No Impact
2.11 Hazardous Waste/Materials	Buried Hazards and Exposure to Hazardous Materials	No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found in the Alt 1 Project limits. There is one current recognized environmental condition in connection with the SR-94/Steele Canyon Road Project limits. In addition, aerially-deposited lead/lead-	No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found in the Alt 2: Opt 1 Project limits. There is one current recognized environmental condition in connection with the SR-94/Steele Canyon Road Project limits. In addition, aerially-deposited lead/lead-	No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found in the Alt 2: Opt 2 Project limits. There is one current recognized environmental condition in connection with the SR-94/Steele Canyon Road Project limits. In addition, aerially-deposited lead/lead-	No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found in the Alt 2: Opt 3 Project limits. There is one current recognized environmental condition in connection with the SR-94/Steele Canyon Road Project limits. In addition, aerially-deposited lead/lead-	No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found in the Alt 3 Project limits. There is one current recognized environmental condition in connection with the SR-94/Steele Canyon Road Project limits. In addition, aerially-deposited	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		containing surfaces, and treated wood waste may be present within the Project limits. Measures have been identified to ensure this impact is less-than-significant.	containing surfaces, and treated wood waste may be present within the Project limits. Measures have been identified to ensure this impact is less-than-significant.	containing surfaces, and treated wood waste may be present within the Project limits. Measures have been identified to ensure this impact is less-than-significant.	containing surfaces, and treated wood waste may be present within the Project limits. Measures have been identified to ensure this impact is less-than-significant.	lead/lead-containing surfaces, and treated wood waste may be present within the Project limits. Measures have been identified to ensure this impact is less-than-significant.	
2.12 Air Quality	Construction Impacts – Regional Emissions	Construction of Alt 1 is not expected to last more than 1-year; therefore, a less-than-significant construction impact related to regional emissions would occur.	Construction of Alt 2: Opt 1 is not expected to last more than 1-year; therefore, a less-than-significant construction impact related to regional emissions would occur.	Construction of Alt 2: Opt 2 is not expected to last more than 1-year; therefore, a less-than-significant construction impact related to regional emissions would occur.	Construction of Alt 2: Opt 3 is not expected to last more than 1-year; therefore, a less-than-significant construction impact related to regional emissions would occur.	Construction of Alt 3 is not expected to last more than 1-year; therefore, a less-than-significant construction impact related to regional emissions would occur.	No Impact.
	Construction Impacts – Local Emissions (Hot Spot Analysis)	Alt 1 construction is considered a temporary activity; thus, no local hot spot is anticipated, and a hot spot analysis is not required. There are no active recreational areas along the existing or future alignment; therefore, a less-than-significant impact would occur.	Alt 2: Opt 1 construction is considered a temporary activity; thus, no local hot spot is anticipated, and a hot spot analysis is not required. There are no active recreational areas along the existing or future alignment; therefore, a less-than-significant impact would occur.	Alt 2: Opt 2 construction is considered a temporary activity; thus, no local hot spot is anticipated, and a hot spot analysis is not required. There are no active recreational areas along the existing or future alignment; therefore, a less-than-significant impact would occur.	Alt 2: Opt 3 construction is considered a temporary activity; thus, no local hot spot is anticipated, and a hot spot analysis is not required. There are no active recreational areas along the existing or future alignment; therefore, a less-than-significant impact would occur.	Alt 3 construction is considered a temporary activity; thus, no local hot spot is anticipated, and a hot spot analysis is not required. There are no active recreational areas along the existing or future alignment; therefore, a less-than-significant impact would occur.	No Impact
	Construction Impacts - Odor	Alt 1 construction odors would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people off-site. Odor impacts would be less-than-significant.	Alt 2: Opt 1 construction odors would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people off-site. Odor impacts would be less-than-significant.	Alt 2: Opt 2 construction odors would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people off-site. Odor impacts would be less-than-significant.	Alt 2: Opt 3 construction odors would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people off-site. Odor impacts would be less-than-significant.	Alt 3 construction odors would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people off-site. Odor impacts would be less-than-significant.	No Impact
	Long Term – Regional Emissions	Alt 1 would not generate any new vehicle trips; therefore, the regional emissions of concern are related to construction activities only. A less-than-significant impact would result.	Alt 2: Opt 1 would not generate any new vehicle trips; therefore, the regional emissions of concern are related to construction activities only. A less-than-significant impact would result.	Alt 2: Opt 2 would not generate any new vehicle trips; therefore, the regional emissions of concern are related to construction activities only. A less-than-significant impact would result.	Alt 2: Opt 3 would not generate any new vehicle trips; therefore, the regional emissions of concern are related to construction activities only. A less-than-significant impact would result.	Alt 3 would not generate any new vehicle trips; therefore, the regional emissions of concern are related to construction activities only. A less-than-significant impact would result.	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
	Local Air Quality – Hot Spot Analysis	The Alt 1 CO hotspot modeling results indicate that traffic delays would not exceed the 1-hour or 8-hour NAAQS or CAAQS limit for CO and would not create a CO hotspot. With regards to PM, the mix of vehicles would be similar in the future to existing conditions, thus, total diesel vehicles would be less than eight percent. Additionally, the Project limits are not located in a federally designated $PM_{2.5}$ and/or PM_{10} nonattainment or maintenance area. Therefore, Alt 1 does not meet the criteria of a POAQC as defined in the PM Guidance, and no further analysis is required. A less-than-significant impact would result.	The Alt 2: Opt 1 CO hotspot modeling results indicate that traffic delays would not exceed the 1-hour or 8-hour NAAQS or CAAQS limit for CO and would not create a CO hotspot. With regards to PM, the mix of vehicles would be similar in the future to existing conditions, thus, total diesel vehicles would be less than eight percent. Additionally, the Project limits are not located in a federally designated $PM_{2.5}$ and/or PM_{10} nonattainment or maintenance area. Therefore, Alt 2: Opt 1 does not meet the criteria of a POAQC as defined in the PM Guidance, and no further analysis is required. A less-than-significant impact would result.	The Alt 2: Opt 2 CO hotspot modeling results indicate that traffic delays would not exceed the 1-hour or 8-hour NAAQS or CAAQS limit for CO and would not create a CO hotspot. With regards to PM, the mix of vehicles would be similar in the future to existing conditions, thus, total diesel vehicles would be less than eight percent. Additionally, the Project limits are not located in a federally designated $PM_{2.5}$ and/or PM_{10} nonattainment or maintenance area. Therefore, Alt 2: Opt 2 does not meet the criteria of a POAQC as defined in the PM Guidance, and no further analysis is required. A less-than-significant impact would result.	The Alt 2: Opt 3 CO hotspot modeling results indicate that traffic delays would not exceed the 1-hour or 8-hour NAAQS or CAAQS limit for CO and would not create a CO hotspot. With regards to PM, the mix of vehicles would be similar in the future to existing conditions, thus, total diesel vehicles would be less than eight percent. Additionally, the Project limits are not located in a federally designated $PM_{2.5}$ and/or PM_{10} nonattainment or maintenance area. Therefore, Alt 2: Opt 3 does not meet the criteria of a POAQC as defined in the PM Guidance, and no further analysis is required. A less-than-significant impact would result.	The Alt 3 CO hotspot modeling results indicate that traffic delays would not exceed the 1-hour or 8-hour NAAQS or CAAQS limit for CO and would not create a CO hotspot. With regards to PM, the mix of vehicles would be similar in the future to existing conditions, thus, total diesel vehicles would be less than eight percent. Additionally, the Project limits are not located in a federally designated $PM_{2.5}$ and/or PM_{10} nonattainment or maintenance area. Therefore, Alt 3 does not meet the criteria of a POAQC as defined in the PM Guidance, and no further analysis is required. A less-than-significant impact would result.	No Impact
	Mobile Source Air Toxics	Alt 1 would generate minimal air quality impacts for CAA criteria pollutants and has not been linked with any special MSAT concerns; therefore, Alt 1 would have no meaningful MSAT effects and would result in no meaningful effects to MSAT.	Alt 2: Opt 1 would generate minimal air quality impacts for CAA criteria pollutants and has not been linked with any special MSAT concerns; therefore, Alt 2: Opt 1 would have no meaningful MSAT effects and would result in no meaningful effects to MSAT.	Alt 2: Opt 2 would generate minimal air quality impacts for CAA criteria pollutants and has not been linked with any special MSAT concerns; therefore, Alt 2: Opt 2 would have no meaningful MSAT effects and would result in no meaningful effects to MSAT.	Alt 2: Opt 3 would generate minimal air quality impacts for CAA criteria pollutants and has not been linked with any special MSAT concerns; therefore, Alt 2: Opt 3 would have no meaningful MSAT effects and would result in no meaningful effects to MSAT.	Alt 3 would generate minimal air quality impacts for CAA criteria pollutants and has not been linked with any special MSAT concerns; therefore, Alt 3 would have no meaningful MSAT effects and would result in no meaningful effects to MSAT.	No Impact
2.13 Climate Change	Greenhouse Gas Emissions	Alt 1 would not result in a significant construction and operational impact associated with greenhouse gas emissions.	Alt 2: Opt 1 would not result in a significant construction and operational impact associated with greenhouse gas emissions.	Alt 2: Opt 2 would not result in a significant construction and operational impact associated with greenhouse gas emissions.	Alt 2: Opt 3 would not result in a significant construction and operational impact associated with greenhouse gas emissions.	Alt 3 would not result in a significant construction and operational impact associated with greenhouse gas emissions.	No Impact
2.14 Noise	Traffic Noise	Alt 1 would not result in a direct increase in noise levels at any existing land use. There would be an	Alt 2: Opt 1 would not result in a direct increase in noise levels at any existing land use. There would be an	Alt 2: Opt 2 would not result in a direct increase in noise levels at any existing land use. There would be an	Alt 2: Opt 3 would not result in a direct increase in noise levels at any existing land use. There would be an	Alt 3 would not result in a direct increase in noise levels at any existing land use. There would be an	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		increase in noise levels as traffic volumes increase; however, the change in noise levels on would be barely perceptible to the average human ear and noise levels would not exceed the NAC at any receiver. Therefore, a less-than-significant traffic noise impact would result.	increase in noise levels as traffic volumes increase; however, the change in noise levels on would be barely perceptible to the average human ear and noise levels would not exceed the NAC at any receiver. Therefore, a less-than-significant traffic noise impact would result.	increase in noise levels as traffic volumes increase; however, the change in noise levels on would be barely perceptible to the average human ear and noise levels would not exceed the NAC at any receiver. Therefore, a less-than-significant traffic noise impact would result.	increase in noise levels as traffic volumes increase; however, the change in noise levels on would be barely perceptible to the average human ear and noise levels would not exceed the NAC at any receiver. Therefore, a less-than-significant traffic noise impact would result.	increase in noise levels as traffic volumes increase; however, the change in noise levels on would be barely perceptible to the average human ear and noise levels would not exceed the NAC at any receiver. Therefore, a less-than-significant traffic noise impact would result.	
	Construction Noise	Alt 1 construction noise would be generated by diesel engine-driven construction equipment and construction activities, which would result in a noise level of 85 to 90 dBA at 50 feet. Hourly average noise levels near the edge of the Project limits are anticipated to be 75 dBA Leq or less. Construction-related noise is a less-than-significant impact.	Alt 2: Opt 1 construction noise would be generated by diesel engine-driven construction equipment and construction activities, which would result in a noise level of 85 to 90 dBA at 50 feet. Hourly average noise levels near the edge of the Project limits are anticipated to be 75 dBA Leq or less. Construction-related noise is a less-than-significant impact.	Alt 2: Opt 2 construction noise would be generated by diesel engine-driven construction equipment and construction activities, which would result in a noise level of 85 to 90 dBA at 50 feet. Hourly average noise levels near the edge of the Project limits are anticipated to be 75 dBA Leq or less. Construction-related noise is a less-than-significant impact.	Alt 2: Opt 3construction noise would be generated by diesel engine-driven construction equipment and construction activities, which would result in a noise level of 85 to 90 dBA at 50 feet. Hourly average noise levels near the edge of the Project limits are anticipated to be 75 dBA Leq or less. Construction-related noise is a less-than-significant impact.	Alt 3 construction noise would be generated by diesel engine-driven construction equipment and construction activities, which would result in a noise level of 85 to 90 dBA at 50 feet. Hourly average noise levels near the edge of the Project limits are anticipated to be 75 dBA Leq or less. Construction-related noise is a less-than-significant impact.	No Impact
2.15 Energy	Energy	When balancing energy used during temporary construction against energy saved by relieving congestion and other transportation efficiencies during long-term operation, Alt 1 would result in a less-than-significant impact.	When balancing energy used during temporary construction against energy saved by relieving congestion and other transportation efficiencies during long-term operation, Alt 2: Opt 1 would result in a less-than-significant impact.	When balancing energy used during temporary construction against energy saved by relieving congestion and other transportation efficiencies during long-term operation, Alt 2: Opt 2 would result in a less-than-significant impact.	When balancing energy used during temporary construction against energy saved by relieving congestion and other transportation efficiencies during long-term operation, Alt 2: Opt 3 would result in a less-than-significant impact.	When balancing energy used during temporary construction against energy saved by relieving congestion and other transportation efficiencies during long-term operation, Alt 3 would result in a less-than-significant impact.	No Impact
2.16 Natural Communities	Natural Communities	Line-of-sight clearing on the south side of SR-94 near the SR-94/Lyons Valley Rd. intersection would impact approx. 0.1 acre of coast oak riparian forest. Construction of the SR-94/Maxfield Rd. features would impact approx. 0.69	Line-of-sight clearing on the south side of SR-94 near the SR-94/Lyons Valley Rd. intersection would impact approx. 0.1 acre of coast oak riparian forest. Construction of the SR-94/Maxfield Rd. features would impact approx. 0.69 acres of Diegan	Line-of-sight clearing on the south side of SR-94 near the SR-94/Lyons Valley Rd. intersection would impact approx. 0.1 acre of coast oak riparian forest. Construction of the SR-94/Maxfield Rd. features would impact approx. 0.69 acres of Diegan	Line-of-sight clearing on the south side of SR-94 near the SR-94/Lyons Valley Rd. intersection would impact approx. 0.1 acre of coast oak riparian forest. Construction of the SR-94/Maxfield Rd. features would impact approx. 0.69 acres of Diegan	Line-of-sight clearing on the south side of SR-94 near the SR-94/Lyons Valley Rd. intersection would impact approx. 0.1 acre of coast oak riparian forest. Construction of the SR-94/Maxfield Rd. features would impact	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		acres of Diegan coastal sage scrub: 0.56 acres on the west side of SR-94, and 0.13 acres on the east side of SR-94. Construction of the Alt 1 Access Road Alignment would result in temporary impacts to 0.03 acres of Diegan coastal sage scrub, 0.06 acres of southern coast live oak riparian forest, and 0.48 acres of non-native grassland. Permanent impacts include 0.22 acres of southern coast live oak riparian forest, 0.05 acres of Diegan coastal sage scrub, and 0.95 acres of non-native grassland. The impact to natural communities is less-than-significant with identified mitigation.	coastal sage scrub: 0.56 acres on the west side of SR-94, and 0.13 acres on the east side of SR-94. Construction of the Alt 2: Opt 1 Access Road Alignment would result in temporary impacts to 0.02 acres of southern coast live oak riparian forest, and 0.3 acres of non-native grassland. Permanent impacts include 0.11 acres of southern coast live oak riparian forest, and 0.43 acres of non-native grassland. The impact to natural communities is less-than-significant with identified mitigation.	coastal sage scrub: 0.56 acres on the west side of SR-94, and 0.13 acres on the east side of SR-94. Construction of the Alt 2: Opt 2 Access Road Alignment would result in temporary impacts to 0.03 acres of southern coast live oak riparian forest, and 0.52 acres of non-native grassland. Permanent impacts include 0.25 acres of southern coast live oak riparian forest, and 0.82 acres of non-native grassland. The impact to natural communities is less-than-significant with identified mitigation.	coastal sage scrub: 0.56 acres on the west side of SR-94, and 0.13 acres on the east side of SR-94. Construction of the Alt 2: Opt 3 Access Road Alignment would result in temporary impacts to 0.06 acres of southern coast live oak riparian forest, and 0.09 acres of non-native grassland. Permanent impacts include 0.03 acres of southern coast live oak riparian forest, and 0.07 acres of non-native grassland. The impact to natural communities is less-than-significant with identified mitigation.	approx. 0.69 acres of Diegan coastal sage scrub: 0.56 acres on the west side of SR-94, and 0.13 acres on the east side of SR-94. Construction of the Alt 3 Access Road Alignment would result in temporary impacts to 0.06 acres of southern coast live oak riparian forest, and 0.09 acres of non-native grassland. Permanent impacts include 0.03 acres of southern coast live oak riparian forest, and 0.07 acres of non-native grassland. The impact to natural communities is less-than-significant with identified mitigation.	
	Wildlife Corridors	Improvement sites either do not function as wildlife corridors or features (e.g., retaining walls) would not disrupt known wildlife movement corridors. Retaining walls would discourage animals from entering the ROW. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. Alt 1 would not result in impacts to wildlife movement or corridors.	Improvement sites either do not function as wildlife corridors or features (e.g., retaining walls) would not disrupt known wildlife movement corridors. Retaining walls would discourage animals from entering the ROW. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. Alt 2: Opt 1 would not result in impacts to wildlife movement or corridors.	Improvement sites either do not function as wildlife corridors or features (e.g., retaining walls) would not disrupt known wildlife movement corridors. Retaining walls would discourage animals from entering the ROW. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. Alt 2: Opt 2 would not result in impacts to wildlife movement or corridors.	Improvement sites either do not function as wildlife corridors or features (e.g., retaining walls) would not disrupt known wildlife movement corridors. Retaining walls would discourage animals from entering the ROW. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. Alt 2: Opt 3 would not result in impacts to wildlife movement or corridors.	Alt 3 would result in a new road in Hardline Preserve, which would cause habitat fragmentation and restrict wildlife movement and reduce the utility of Willow Creek as a wildlife corridor. This is considered a significant unavoidable impact.	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
2.17 Wetlands and Other Waters	Water Resources	Alt 1 construction activities could result in 0.05 acres of permanent impacts and 0.01 acres of temporary impacts to waters of the U.S.; and 0.37 acres of permanent impacts and 0.07 acres of temporary impacts to waters of the State. Identified mitigation would reduce the impact to a less-than-significant level.	Alt 2: Opt 1 construction activities could result in 0.01 acres of temporary impacts to waters of the U.S.; and 0.21 acres of permanent impacts and 0.07 acres of temporary impacts to waters of the State. Identified mitigation would reduce the impact to a less-than-significant level.	Alt 2: Opt 2 construction activities could result in 0.05 acres of permanent impacts and 0.01 acres of temporary impacts to waters of the U.S.; and 0.40 acres of permanent impacts and 0.04 acres of temporary impacts to waters of the State. Identified mitigation would reduce the impact to a less-than-significant level.	Alt 2: Opt 3 construction activities could result in 0.02 acres of permanent impacts and 0.01 acres of temporary impacts to waters of the U.S.; and 0.15 acres of permanent impacts and 0.07 acres of temporary impacts to waters of the State. Identified mitigation would reduce the impact to a less-than-significant level.	Alt 3 construction activities could result in 0.10 acres of permanent impacts and 0.02 acres of temporary impacts to waters of the U.S.; and 0.77 acres of permanent impacts and 0.16 acres of temporary impacts to waters of the State. Identified mitigation would reduce the impact to a less-than-significant level.	No Impact
2.18 Plant Species	Special Status Plant Species	Alt 1 would impact 2,250-square feet of Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) at SR-94/Jamacha Rd. intersection. Identified mitigation would reduce this impact to a less-than-significant level.	Alt 2: Opt 1 would impact 2,250-square feet of Palmer's goldenbush at SR-94/Jamacha Rd. intersection. Identified mitigation would reduce this impact to a less-than-significant level.	Alt 2: Opt 2 would impact 2,250-square feet of Palmer's goldenbush at SR-94/Jamacha Rd. intersection. Identified mitigation would reduce this impact to a less-than-significant level.	Alt 2: Opt 3 would impact 2,250-square feet of Palmer's goldenbush at SR-94/Jamacha Rd. intersection. Identified mitigation would reduce this impact to a less-than-significant level.	Alt 3 would impact 2,250-square feet of Palmer's goldenbush at SR-94/Jamacha Rd. intersection and approximately 24-square feet on the 87-acre parcel. Identified mitigation would reduce this impact to a less-than-significant level.	No Impact
2.19 Animal Species	Special-Status Animal Species	None of the wildlife surveys detected any special-status animal species within the Alt 1 Project limits. No direct impacts to special-status animal species would occur.	None of the wildlife surveys detected any special-status animal species within the Alt 2: Opt 1 Project limits. No direct impacts to special-status animal species would occur.	None of the wildlife surveys detected any special-status animal species within the Alt 2: Opt 2 Project limits. No direct impacts to special-status animal species would occur.	None of the wildlife surveys detected any special-status animal species within the Alt 2: Opt 3 Project limits. No direct impacts to special-status animal species would occur.	None of the wildlife surveys detected any special-status animal species within the Alt 3 Project limits. No direct impacts to special-status animal species would occur.	No Impact
	Lighting and Noise	Alt 1 construction activities would generate noise which could temporarily impact wildlife. Temporary/ permanent lighting could disrupt wildlife behavior if not properly shielded. These impacts would be reduced to a less-than-significant level with identified mitigation. Operation of Alt 1 features would not create any	Alt 2: Opt 1 construction activities would generate noise which could temporarily impact wildlife. Temporary/permanent lighting could disrupt wildlife behavior if not properly shielded. These impacts would be reduced to a less-than-significant level with identified mitigation. Operation of Alt 2: Opt 1 features would not create any	Alt 2: Opt 2 construction activities would generate noise which could temporarily impact wildlife. Temporary/permanent lighting could disrupt wildlife behavior if not properly shielded. These impacts would be reduced to a less-than-significant level with identified mitigation. Operation of Alt 2: Opt 2 features would not create	Alt 2: Opt 3 construction activities would generate noise which could temporarily impact wildlife. Temporary/permanent lighting could disrupt wildlife behavior if not properly shielded. These impacts would be reduced to a less-than-significant level with identified mitigation. Operation of Alt 2: Opt 3 features would not create	Alt 3 construction activities would generate noise which could temporarily impact wildlife. Temporary/permanent lighting could disrupt wildlife behavior if not properly shielded. Alt 3 would result in a new road in Hardline Preserve, which would result in a potentially adverse impact to sensitive species from	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
		additional noise sources.	additional noise sources.	any additional noise sources.	any additional noise sources.	noise generated from the new road. These impacts are less-than-significant with identified mitigation.	
	Nesting Birds	If Alt 1 construction activities occur during the breeding season, nesting birds could be directly impacted by tree trimming or removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. This impact is less-than-significant with identified mitigation.	If Alt 2: Opt 1 construction activities occur during the breeding season, nesting birds could be directly impacted by tree trimming or removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. This impact is less-than-significant with identified mitigation.	If Alt 2: Opt 2 construction activities occur during the breeding season, nesting birds could be directly impacted by tree trimming or removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. This impact is less-than-significant with identified mitigation.	If Alt 2: Opt 3 construction activities occur during the breeding season, nesting birds could be directly impacted by tree trimming or removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. This impact is less-than-significant with identified mitigation.	If Alt 3 construction activities occur during the breeding season, nesting birds could be directly impacted by tree trimming or removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. This impact is less-than-significant with identified mitigation.	No impact
	Roadkill	Alt 1 would not generate any additional traffic, so volume-related roadkill effects would not be significant. The erection of these retaining walls is seen as a beneficial impact. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. A less-than-significant vehicle-animal collision impact would result.	Alt 2: Opt 1 would not generate any additional traffic, so volume-related roadkill effects would not be significant. The erection of these retaining walls is seen as a beneficial impact. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. A less-than-significant vehicle-animal collision impact would result.	Alt 2: Opt 2 would not generate any additional traffic, so volume-related roadkill effects would not be significant. The erection of these retaining walls is seen as a beneficial impact. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. A less-than-significant vehicle-animal collision impact would result.	Alt 2: Opt 3 would not generate any additional traffic, so volume-related roadkill effects would not be significant. The erection of these retaining walls is seen as a beneficial impact. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. A less-than-significant vehicle-animal collision impact would result.	The erection of these retaining walls under Alt 3 is seen as a beneficial impact. The bottomless culvert under Melody Road would maintain or increase the heights of current under-road passageways for animals. The new road through Hardline Preserve could increase wildlife-vehicle collisions. This is a significant unavoidable impact.	No Impact
2.20 Threatened and Endangered Species	Construction – Quino Checkerspot Butterfly or Hermes Copper Butterfly	Construction of the Alt 1 would not impact Quino checkerspot butterfly or Hermes Copper butterfly because there is no suitable habitat for these species.	Construction of the Alt 2: Opt 1 would not impact Quino checkerspot butterfly or Hermes Copper butterfly because there is no suitable habitat for these species.	Construction of the Alt 2: Opt 2 would not impact Quino checkerspot butterfly or Hermes Copper butterfly because there is no suitable habitat for these species.	Construction of the Alt 2: Opt 3 would not impact Quino checkerspot butterfly or Hermes Copper butterfly because there is no suitable habitat for these species.	Construction of the Alt 3 would impact approximately 16-square feet of dwarf plantain, which is potential habitat for Quino checkerspot butterfly, and approximately eight square feet of spiny redberry, which is potential habitat for Hermes copper butterfly. Construction	No Impact

TABLE S-2 cont.
SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Category	Sub-Category	Alt 1[1] Reservation Road Access	Preferred Alternative Alt 2: Opt 1[1] Daisy Drive Access Full Footprint	Alt 2: Opt 2[1] Daisy Drive Access Reduced Footprint	Alt 2: Opt 3[1] Daisy Drive Access Minimum Footprint	Alt 3[1] Melody Road Access	Alt 4 No Project
						activities could result in direct impacts such as trampling or vehicle collisions or in indirect impacts via habitat loss. The impact is less-than-significant.	
2.21 Invasive Species	Invasive Species	The use of Caltrans Standard Measures listed in Section 2.21.4 ensures that a less-than-significant impact would result from the construction of Alt 1.	The use of Caltrans Standard Measures listed in Section 2.21.4 ensures that a less-than-significant impact would result from the construction of Alt 2: Opt 1.	The use of Caltrans Standard Measures listed in Section 2.21.4 ensures that a less-than-significant impact would result from the construction of Alt 2: Opt 2.	The use of Caltrans Standard Measures listed in Section 2.21.4 ensures that a less-than-significant impact would result from the construction of Alt 2: Opt 3.	The use of Caltrans Standard Measures listed in Section 2.21.4 ensures that a less-than-significant impact would result from the construction of Alt 3.	No Impact
Cumulative Impacts		Impacts would result from cumulative development; however, the contribution to these impacts from Alt 1 would be less than cumulatively considerable.	Impacts would result from cumulative development; however, the contribution to these impacts from Alt 2: Opt 1 would be less than cumulatively considerable.	Impacts would result from cumulative development; however, the contribution to these impacts from Alt 2: Opt 2 would be less than cumulatively considerable.	Impacts would result from cumulative development; however, the contribution to these impacts from Alt 2: Opt 3 would be less than cumulatively considerable.	Impacts would result from cumulative development. The contribution to animal impacts (wildlife corridor and animal kill) from Alt 3 would be cumulatively considerable.	No Impact

TABLE OF CONTENTS

TABLE OF CONTENTS

FINAL ENVIRONMENTAL IMPACT REPORT
SR-94 IMPROVEMENT PROJECT

S.0 SUMMARY

S.1 Introduction S-1
S.2 Project Location S-1
S.3 Project Objectives S-2
S.3.1 Purpose of the Project S-2
S.3.2 Need for the Project S-2
S.4 Project Description S-3
S.5 Summary of Environmental Impacts S-4
S.6 Coordination with Public and Other Agencies S-5
S.7 Issues to Be Resolved and Areas of Controversy S-7

1.0 PROPOSED PROJECT

1.1 Introduction 1-1
1.2 Project Objectives 1-5
1.2.1 Purpose of the Project 1-5
1.2.2 Need for the Project 1-5
1.3 Project Description Summary 1-7
1.4 Project Alternatives 1-8
1.4.1 Common Design Features of Alternatives 1-3: Build Alternatives 1-8
1.4.2 Alternative 1: Reservation Road Access 1-20
1.4.3 Alternative 2: Daisy Drive Access 1-26
1.4.4 Alternative 3: Melody Road Access 1-38
1.4.5 Alternative 4: No Project Alternative 1-42
1.5 Comparison of Alternatives 1-42
1.6 Identification of the Preferred Alternative 1-43
1.7 Alternatives Considered but Eliminated from Further Discussion Prior to Draft Environmental Impact Report (EIR) 1-44
1.8 Permits and Approvals 1-45

2.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

HUMAN ENVIRONMENT

2.1 Land Use 2.1-1
2.1.1 Existing and Future Land Use 2.1-1
2.1.2 Consistency with the State, Regional and Local Plans and Programs 2.1-10
2.1.3 Park and Recreational Facilities 2.1-42
2.2 Growth 2.2-1
2.2.1 Regulatory Setting 2.2-1
2.2.2 Affected Environment 2.2-1
2.2.3 Environmental Consequences 2.2-2

2.2.4 Avoidance, Minimization and/or Mitigation Measures 2.2-5
2.3 Community Character and Cohesion 2.3-1
2.3.1 Regulatory Setting.....2.3-1
2.3.2 Affected Environment.....2.3-1
2.3.3 Environmental Consequences 2.3-6
2.3.4 Avoidance, Minimization and/or Mitigation Measures 2.3-20
2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities 2.4-1
2.4.1 Regulatory Setting.....2.4-1
2.4.2 Affected Environment.....2.4-1
2.4.3 Environmental Consequences 2.4-11
2.4.4 Avoidance, Minimization and/or Mitigation Measures 2.4-69
2.5 Utilities/Emergency Services 2.5-1
2.5.1 Affected Environment.....2.5-1
2.5.2 Environmental Consequences 2.5-2
2.5.3 Avoidance, Minimization and/or Mitigation Measures 2.5-4
2.6 Visual Resources/Aesthetics 2.6-1
2.6.1 Regulatory Setting.....2.6-1
2.6.2 Affected Environment 2.6-1
2.6.3 Environmental Consequences 2.6-15
2.6.4 Avoidance, Minimization and/or Mitigation Measures 2.6-23
2.7 Cultural Resources 2.7-1
2.7.1 Regulatory Setting.....2.7-1
2.7.2 Affected Environment.....2.7-1
2.7.3 Environmental Consequences 2.7-4
2.7.4 Avoidance, Minimization and/or Mitigation Measures 2.7-4
2.8 Hydrology and Floodplain 2.8-1
2.8.1 Regulatory Setting.....2.8-1
2.8.2 Affected Environment.....2.8-1
2.8.3 Environmental Consequences 2.8-3
2.8.4 Avoidance, Minimization and/or Mitigation Measures 2.8-6
2.9 Water Quality and Storm Water Runoff 2.9-1
2.9.1 Regulatory Setting.....2.9-1
2.9.2 Affected Environment.....2.9-5
2.9.3 Environmental Consequences 2.9-8
2.9.4 Avoidance, Minimization and/or Mitigation Measures 2.9-11
2.10 Geology/Soils/Seismic/Topography 2.10-1
2.10.1 Regulatory Setting.....2.10-1
2.10.2 Environmental Setting.....2.10-1
2.10.3 Environmental Consequences 2.10-4
2.10.4 Avoidance, Minimization and/or Mitigation Measures 2.10-6
2.11 Hazardous Waste/Materials 2.11-1
2.11.1 Regulatory Setting.....2.11-1
2.11.2 Affected Environment.....2.11-2
2.11.3 Environmental Consequences 2.11-5
2.11.4 Avoidance, Minimization and/or Mitigation Measures 2.11-7
2.12 Air Quality 2.12-1
2.12.1 Regulatory Setting.....2.12-1

2.12.2 Affected Environment 2.12-2
2.12.3 Environmental Consequences 2.12-9
2.12.4 Avoidance, Minimization and/or Mitigation Measures 2.12-16
2.13 Climate Change 2.13-1
2.13.1 Regulatory Setting 2.13-1
2.13.2 Proposed Project Analysis 2.13-4
2.13.3 Greenhouse Gas Reduction Strategies 2.13-7
2.13.4 Avoidance, Minimization and/or Mitigation Measures 2.13-13
2.14 Noise 2.14-1
2.14.1 Regulatory Setting 2.14-1
2.14.2 Existing Noise Environment 2.14-2
2.14.3 Environmental Consequences 2.14-6
2.14.4 Avoidance, Minimization and/or Mitigation Measures 2.14-11
2.15 Energy 2.15-1
2.15.1 Regulatory Setting 2.15-1
2.15.2 Affected Environment 2.15-1
2.15.3 Environmental Consequences 2.15-2
2.15.4 Avoidance, Minimization and/or Mitigation Measures 2.15-3

BIOLOGICAL ENVIRONMENT
2.16 Natural Communities 2.16-1
2.16.1 Affected Environment 2.16-1
2.16.2 Environmental Consequences 2.16-5
2.16.3 Avoidance, Minimization and/or Mitigation Measures 2.16-10
2.17 Wetlands and Other Waters 2.17-1
2.17.1 Regulatory Setting 2.17-1
2.17.2 Affected Environment 2.17-2
2.17.3 Environmental Consequences 2.17-4
2.17.4 Avoidance, Minimization and/or Mitigation Measures 2.17-6
2.18 Plant Species 2.18-1
2.18.1 Regulatory Setting 2.18-1
2.18.2 Affected Environment 2.18-1
2.18.3 Environmental Consequences 2.18-2
2.18.4 Avoidance, Minimization and/or Mitigation Measures 2.18-3
2.19 Animal Species 2.19-1
2.19.1 Regulatory Setting 2.19-1
2.19.2 Affected Environment 2.19-1
2.19.3 Environmental Consequences 2.19-3
2.19.4 Avoidance, Minimization and/or Mitigation Measures 2.19-6
2.20 Threatened and Endangered Species 2.20-1
2.20.1 Regulatory Setting 2.20-1
2.20.2 Affected Environment 2.20-2
2.20.3 Environmental Consequences 2.20-4
2.20.4 Avoidance, Minimization and/or Mitigation Measures 2.20-5
2.21 Invasive Species 2.21-1
2.21.1 Regulatory Setting 2.21-1
2.21.2 Affected Environment 2.21-1

2.21.3 Environmental Consequences 2.21-1
2.21.4 Avoidance, Minimization and/or Mitigation Measures 2.21-2

3.0 CUMULATIVE IMPACTS
3.1 Regulatory Setting.....3-1
3.2 Affected Environment.....3-1
3.2.1 Geographic Boundary and Time Frame 3-1
3.2.2 Cumulative Issues/Resources Discussed.....3-2
3.2.3 Cumulative Project List.....3-3
3.3 Environmental Consequences 3-11
3.3.1 Land Use 3-12
3.3.2 Community Character and Cohesion 3-14
3.3.3 Traffic and Transportation/Pedestrian and Bicycle Facilities 3-16
3.3.4 Utilities/Emergency Services 3-19
3.3.5 Visual Resources/Aesthetics 3-21
3.3.6 Hydrology and Floodplain 3-22
3.3.7 Water Quality and Storm Water Runoff 3-24
3.3.8 Geology/Soils/Seismic/Topography.....3-25
3.3.9 Hazardous Waste/Materials 3-26
3.3.10 Air Quality 3-26
3.3.11 Noise 3-27
3.3.12 Energy 3-29
3.3.13 Natural Communities 3-30
3.3.14 Wetlands.....3-32
3.3.15 Plant Species 3-33
3.3.16 Animal Species.....3-34
3.3.17 Threatened/Endangered Species 3-35
3.3.18 Invasive Species.....3-36
3.3.19 Summary 3-38

4.0 MANDATORY CEQA SECTIONS
4.1 No Impacts 4-1
4.2 Less-Than-Significant Impacts 4-1
4.3 Less-Than-Significant Impacts after Mitigation 4-1
4.4 Significant Unavoidable Impacts 4-1

5.0 COUNTY OF SAN DIEGO SUMMARY
5.1 Introduction.....5-1
5.2 Land Use 5-2
5.3 Transportation/Traffic.....5-5
5.4 Utilities and Public Service.....5-10
5.5 Visual Resources.....5-11
5.6 Cultural Resources 5-14
5.7 Hydrology and Floodplain 5-16
5.8 Water Quality.....5-21
5.9 Geology and Soils 5-25

5.10 Hazardous Materials....5-29
5.11 Air Quality....5-33
5.12 Climate Change....5-37
5.13 Noise....5-39
5.14 Biological Resources....5-47
5.15 Energy....5-62

6.0 COMMENTS AND COORDINATION
6.1 Introduction....6-1
6.2 Public Scoping Process....6-1
6.3 Project Development Team Meetings....6-3
6.4 Consultation and Coordination....6-3
6.4 Public Review Record....6-5

7.0 LIST OF PREPARERS....7.1

8.0 DISTRIBUTION LIST....8.1

LIST OF TABLES

S-1 Improvements for Each Location/Alternative....S-9
S-2 Summary of Environmental Impacts....S-10
S-3 Permits and Approval....S-6
1-1 Existing and Future Peak Hour Intersection LOS....1-6
1-2 ROW Details: SR-94/Jamacha Road....1-12
1-3 Proposed ROW Acquisition: SR-94/Steele Canyon Road....1-15
1-4 Proposed ROW Acquisition: SR-94/Maxfield Canyon Road....1-19
1-5 Proposed ROW Acquisition: Alternative 1: Reservation Road Access....1-26
1-6 Proposed ROW Acquisition: Preferred Alternative – Alternative 2: Daisy Drive Access; Option 1 Full Footprint....1-30
1-7 Proposed ROW Acquisition: Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint....1-33
1-8 Proposed ROW Acquisition: Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint....1-37
1-9 Proposed ROW Acquisition: Alternative 3: Melody Road Access Alignment....1-41
1-10 Comparison of Alternatives 1-3: Build Alternatives....1-42
1-11 Permits and Approvals....1-45
2.1-1 Potential Future Development Projects....2.1-10
2.1-2 Consistency with State, Regional, and Local Plans and Programs....2.1-32
2.3-1 Community Impact Study Area and San Diego County Population and Housing Characteristics....2.3-2
2.3-2 Proposed Right-of-Way Acquisition: Non-Access Road Intersections....2.3-8
2.3-3 Proposed Right-of-Way Acquisition: Reservation Road Access Alignment....2.3-11
2.3-4 Proposed Right-of-Way Acquisition: Daisy Drive Access Alignments....2.3-12
2.3-5 Proposed Right-of-Way Acquisition: Melody Road Access Alignment....2.3-14
2.4-1 Study Intersections....2.4-4
2.4-2 Existing (2013) Baseline Peak-Hour Intersection LOS (Weekday)....2.4-6
2.4-3 Existing (2013) Baseline Peak-Hour Intersection LOS (Friday/Saturday)....2.4-7

2.4-4 Existing (2013) Baseline ILV Analysis (Weekday) 2.4-8
2.4-5 Existing (2013) Baseline ILV Analysis (Friday/Saturday) 2.4-8
2.4-6 Existing (2013) Baseline Peak-Hour Arterial Segment Analysis (Weekday) 2.4-9
2.4-7 Existing (2013) Baseline Peak-Hour Arterial Segment Analysis (Friday/Saturday) 2.4-9
2.4-8 Existing (2013) Baseline Two-Way Two-Lane Segment Analysis 2.4-10
2.4-9 Existing (2013) with JIV Gaming Development Project Peak-Hour Intersection LOS (Weekday) 2.4-14
2.4-10 Existing (2013) with JIV Gaming Development Project Peak-Hour Intersection LOS (Friday/Saturday) 2.4-15
2.4-11 Existing (2013) with JIV Gaming Development Project ILV Analysis (Weekday) 2.4-17
2.4-12 Existing (2013) with JIV Gaming Development Project ILV Analysis (Friday/Saturday) 2.4-17
2.4-13 Existing (2013) with JIV Gaming Development Project Peak-Hour Intersection Arterial Segment Analysis (Weekday) 2.4-18
2.4-14 Existing (2013) with JIV Gaming Development Project Peak-Hour Intersection Arterial Segment Analysis (Friday/Saturday) 2.4-18
2.4-15 Existing (2013) with JIV Gaming Development Project Two-Way Two-Lane Highway Segment Analysis 2.4-19
2.4-16 Near-Term (2015) No Build Peak-Hour Intersection LOS (Weekday) 2.4-24
2.4-17 Near-Term (2015) No Build Peak-Hour Intersection LOS (Friday/Saturday) 2.4-25
2.4-18 Near-Term (2015) No Build ILV Analysis (Weekday) 2.4-27
2.4-19 Near-Term (2015) No Build ILV Analysis (Friday/Saturday) 2.4-27
2.4-20 Near-Term (2015) No Build Peak-Hour Arterial Analysis (Weekday) 2.4-28
2.4-21 Near-Term (2015) No Build Peak-Hour Arterial Analysis (Friday/Saturday) 2.4-28
2.4-22 Near-Term (2015) No Build Two-Highway Segment Analysis 2.4-29
2.4-23 Horizon Year (2035) No Build Peak-Hour Intersection LOS (Weekday) Two-Lane Highway Segment Analysis 2.4-31
2.4-24 Horizon Year (2035) No Build Peak-Hour Intersection LOS (Friday/Saturday) 2.4-32
2.4-25 Horizon Year (2035) No Build ILV Analysis (Weekday) 2.4-34
2.4-26 Horizon Year (2035) No Build ILV Analysis (Friday/Saturday) 2.4-34
2.4-27 Horizon Year (2035) No Build Peak-Hour Arterial Segment Analysis (Weekday) 2.4-35
2.4-28 Horizon Year (2035) No Build Peak-Hour Arterial Segment Analysis (Friday/Saturday) 2.4-35
2.4-29 Horizon Year (2035) No Build Two-Lane Highway Segment Analysis 2.4-36
2.4-30 Existing (2013) with JIV Gaming Development Project with Proposed Project Alternatives 1 and 2 Peak-Hour Intersection LOS (Weekday) 2.4-38
2.4-31 Existing (2013) with JIV Gaming Development Project with Proposed Project Alternatives 1 and 2 Peak-Hour Intersection LOS (Friday/Saturday) 2.4-39
2.4-32 Existing (2013) with JIV Gaming Development Project plus Proposed Project Alternative 3: Melody Road Access Peak-Hour Intersection LOS (Weekday) ... 2.4-41
2.4-33 Existing (2013) with JIV Gaming Development Project plus Proposed Project Alternative 3: Melody Road Access Peak-Hour Intersection LOS (Friday/Saturday) 2.4-42

2.4-34 Existing (2013) with JIV Gaming Development Project plus Proposed Project Improvements ILV Analysis (Alts 1-3) (Weekday) 2.4-43
2.4-35 Existing (2013) with JIV Gaming Development Project plus Proposed Project Improvements ILV Analysis 2.4-44
2.4-36 Existing (2013) with JIV Gaming Development Project plus Proposed Project Improvements (Alts 1-3) Peak-Hour Arterial Segment Analysis (Weekday) 2.4-45
2.4-37 Existing (2013) with JIV Gaming Development Project plus Proposed Project Improvements (Alts 1-3) Peak-Hour Arterial Segment Analysis (Friday/Saturday) 2.4-45
2.4-38 Near-Term (2015) plus Proposed Project Alternatives 1 and 2 Peak-Hour Intersection LOS (Weekday) Segment Analysis 2.4-47
2.4-39 Near-Term (2015) plus Proposed Project Alternatives 1 and 2 Peak-Hour Intersection LOS (Friday/Saturday) 2.4-48
2.4-40 Near-Term (2015) Proposed Project Alternative 3: Melody Road Access Peak-Hour Intersection LOS (Weekday) 2.4-50
2.4-41 Near-Term (2015) plus Proposed Project Alternative 3: Melody Road Access Peak-Hour Intersection LOS (Friday/Saturday) 2.4-51
2.4-42 Near-Term (2015) plus Proposed Project Improvements (Alternatives 1-3) ILV Analysis (Weekday) 2.4-52
2.4-43 Near-Term (2015) plus Proposed Project Improvements (Alternatives 1-3) ILV Analysis (Friday/Saturday) 2.4-53
2.4-44 Near-Term (2015) plus Proposed Project Improvements (Alternatives 1- 3) Peak-Hour Arterial Segment Analysis (Weekday) 2.4-54
2.4-45 Near-Term (2015) plus Project Improvements (Alternatives 1- 3) Peak-Hour Arterial Segment Analysis (Friday/Saturday) 2.4-54
2.4-46 Near-Term (2015) plus Project Improvements (Alternatives 1- 3) Peak-Hour Arterial Segment Analysis to Melody Road (Weekday) 2.4-55
2.4-47 Near-Term (2015) plus Project Improvements (Alternatives 1- 3) Peak-Hour Arterial Segment Analysis to Melody Road (Friday/Saturday) 2.4-55
2.4-48 Horizon Year (2035) plus Proposed Project Alternatives 1 - 2 Peak-Hour Intersection LOS (Weekday) 2.4-57
2.4-49 Horizon Year (2035) plus Proposed Project Alternatives 1 - 2 Peak-Hour Intersection LOS (Friday/Saturday) 2.4-58
2.4-50 Horizon Year (2035) plus Proposed Project Alternative 3: Melody Road Access Peak-Hour Intersection LOS (Weekday) 2.4-59
2.4-51 Horizon Year (2035) plus Proposed Project Alternative 3: Melody Road Access Alignment Peak-Hour Intersection LOS (Friday/Saturday) 2.4-60
2.4-52 Horizon Year (2035) plus Proposed Project Improvements (Alternatives 1-3) ILV Analysis (Weekday) 2.4-62
2.4-53 Horizon Year (2035) plus Proposed Project Improvements (Alternatives 1-3) ILV Analysis (Friday/Saturday) 2.4-63
2.4-54 Horizon Year (2035) plus Proposed Project Improvements (Alternatives 1-3) Arterial Segment Analysis (Weekday) 2.4-64
2.4-55 Horizon Year (2035) plus Proposed Project Improvements (Alternatives 1-3) Arterial Segment Analysis (Friday/Saturday) 2.4-64
2.4-56 Horizon Year (2035) plus Proposed Project Improvements (Alternatives 1-3) Arterial Segment Analysis to Melody Road (Weekday) 2.4-65

2.4-57 Horizon Year (2035) plus Proposed Project Improvements (Alternatives 1-3) Arterial Segment Analysis to Melody Road (Friday/Saturday) 2.4-66
2.8-1 Water Surface Elevation Changes 2.8-5
2.9-1 303(d) List Pollutants for Proposed Project Receiving Waters 2.9-7
2.12-1 Ambient Quality Air Standards 2.12-4
2.12-2 Signalized Intersection LOS Analysis 2.12-12
2.12-3 Estimated Future Maximum CO Concentrations 2.12-13
2.13-1 Climate Change/CO_2 Reduction Strategies 2.13-9
2.14-1 Summary of 24-Hour Measurements 2.14-5
2.14-2 Non-Access Road Intersection Existing vs. Future Noise Comparison 2.14-6
2.14-3 Predicted Horizon Year (2035) Traffic Noise Impacts for Access Alignments 2.14-9
2.16-1 Vegetation Communities in Each Access Alignments 2.16-1
2.17-1 Impacts to Jurisdictional Waters within the Access Road Alignments Proposed Project Limits 2.17-6
3-1 Cumulative Future Development Projects 3-4
3-2 Traffic Study Intersections 3-16
3-3 Summary of Proposed Project Contribution to Cumulative Impacts 3-38
4-1 List of Less-than-Significant Impacts of Build Alternatives 4-2
4-2 List of Less-than-Significant Impacts of Build Alternatives Following Mitigation 4-3
4-3 List of Significant Unavoidable Impacts of Build Alternatives 4-4
5.3-1 Allowable Increases on Congested Mobility Element Road Segments 5-6
5.3-2 Allowable Increases on Congested Intersections 5-6
5.3-3 Horizon Year (2035) Plus Project Conditions Roadway Segment Operations – Alternative 3 5-8
5.11-1 Screening-Level Thresholds for Air Quality Impact Analysis 5-34
5.11-2 Worst-Case Daily Construction Emissions 5-36
5.12-1 Construction GHG Emissions 5-39
5.13-1 2035 Noise Levels for No Project and Project Access Intersection Improvements 5-42
5.13-2 2035 Noise Levels for No Project and Project Access Road Alternatives 5-44
5.14-1 Access Road Impacts to Sensitive Vegetation Communities 5-49
5.14-2 Access Road Impacts to USACE Jurisdictional Areas 5-51
5.14-3 Access Road Impacts to State Jurisdictional Areas 5-51
5.14-4 Access Road Impacts to MSCP Lands 5-58
5.14-5 Potential Conditions for Access Road Impacts to Sensitive Vegetation Communities and MSCP) 5-60

LIST OF FIGURES

1-1 Regional Location Map 1-47
1-2 Project Vicinity Map 1-48
1-3 Levels of Service for Two-Lane Highways 1-49
1-4 SR-94/Jamacha Blvd. Intersection Improvements 1-50
1-5 SR-94/Jamacha Rd. Intersection Improvements 1-51
1-6 SR-94/Steele Canyon Rd. Intersection Improvements 1-52
1-7 SR-94/Lyons Valley Road Intersection Improvements 1-53

1-8 SR-94/Maxfield Road Intersection Improvements....1-54
1-9 Reservation Road Access Alignment (Sheet 1-4)....1-55
1-9 Reservation Road Access Alignment (Sheet 2-4)....1-56
1-9 Reservation Road Access Alignment (Sheet 3-4)....1-57
1-9 Reservation Road Access Alignment (Sheet 4-4)....1-58
1-10 Preferred Alternative - Daisy Dr. Access; Option 1 Full Footprint (Sheet 1-4)....1-59
1-10 Preferred Alternative - Daisy Dr. Access; Option 1 Full Footprint (Sheet 2-4)....1-60
1-10 Preferred Alternative - Daisy Dr. Access; Option 1 Full Footprint (Sheet 3-4)....1-61
1-10 Preferred Alternative - Daisy Dr. Access; Option 1 Full Footprint (Sheet 4-4)....1-62
1-11 Daisy Dr. Access Alignment; Option 2 Reduced Footprint (Sheet 1-4)....1-63
1-11 Daisy Dr. Access Alignment; Option 2 Reduced Footprint (Sheet 2-4)....1-64
1-11 Daisy Dr. Access Alignment; Option 2 Reduced Footprint (Sheet 3-4)....1-65
1-11 Daisy Dr. Access Alignment; Option 2 Reduced Footprint (Sheet 4-4)....1-66
1-12 Daisy Dr. Access Alignment; Option 3 Minimum Footprint (Sheet 1-4)....1-67
1-12 Daisy Dr. Access Alignment; Option 3 Minimum Footprint (Sheet 2-4)....1-68
1-12 Daisy Dr. Access Alignment; Option 3 Minimum Footprint (Sheet 3-4)....1-69
1-12 Daisy Dr. Access Alignment; Option 3 Minimum Footprint (Sheet 4-4)....1-70
1-13 Melody Road Access Alignment (Sheet 1-4)....1-71
1-13 Melody Road Access Alignment (Sheet 2-4)....1-72
1-13 Melody Road Access Alignment (Sheet 3-4)....1-73
1-13 Melody Road Access Alignment (Sheet 4-4).... 1-7492.1-1
Planning Areas....2.1-45
2.1-2 State and Federal Wildlife Agency Lands in the Vicinity of the Project Limits..2.1-46
2.1-3 Existing Land Uses at the SR-94/Jamacha Rd. and SR-94/Jamacha Blvd. Intersections....2.1-47
2.1-4 Existing Land Uses at the SR-94/Steele Canyon Road Intersection....2.1-48
2.1-5 Existing Land Uses at the SR-94/Lyons Valley Road and SR-94/Maxfield Road Intersections....2.1-49
2.1-6 Existing Land Uses Near the Access Alignments Study Area....2.1-50
2.4-1 Study Intersections....2.4-72
2.4-2 Existing Geometrics for Intersections within the Study Area....2.4-73
2.4-3 Existing Baseline Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday....2.4-74
2.4-4 Existing Baseline Traffic Volumes at the Study Intersections for Typical Friday and Saturday Afternoon Peak-Hour Periods....2.4-75
2.4-5 Existing Baseline with JIV Gaming Development Project Peak-Hour Traffic Volumes for Typical Weekday....2.4-76
2.4-6 Existing Baseline with JIV Gaming Development Project Peak-Hour Traffic Volumes for a Typical Friday and Saturday....2.4-77
2.4-7 Cumulative Traffic Trip Generation for the Study Area Intersection....2.4-78
2.4-8 Near Term (2015) No Build Peak-Hour Traffic Volumes for a Typical Weekday....2.4-79
2.4-9 Near Term (2015) No Build Peak-Hour Traffic Volumes for a Typical Friday and Saturday....2.4-80
2.4-10 Horizon Year (2035) No Build Peak-Hour Traffic Volumes for a Typical Weekday....2.4-81

2.4-11 Horizon Year (2035) No Build Peak-Hour Traffic Volumes for a Typical Friday and Saturday 2.4-82
2.4-12 Existing with JIV Gaming Development Project plus Proposed Project (Alts 1-2) Peak-Hour Traffic Volumes for a Typical Weekday 2.4-83
2.4-13 Existing with JIV Gaming Development Project plus Proposed Project (Alts 1-2) Peak-Hour Traffic Volumes for a Typical Friday and Saturday 2.4-84
2.4-14 Existing with JIV Gaming Development Project plus Proposed Project (Alt 3) Peak-Hour Volume Adjustments....2.4-85
2.4-15 Near Term (2015) Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday (Alts 1-2) 2.4-86
2.4-15 Near Term (2015) Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday (Alt3) 2.4-87
2.4-16 Near Term (2015) Traffic Volumes at the Study Intersections for Typical a Friday and Saturday Peak-Hour Periods (Alts 1-2)....2.4-88
2.4-17 Near Term (2015) Peak-Hour Traffic Volumes Adjustments: Alternative 3 Melody Road Access Alignment Project 2.4-89
2.4-18 Horizon Year (2035) with Project Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday (Alt 1-2)....2.4-90
2.4-19 Horizon Year (2035) with Project Peak-Hour Traffic Volumes at the Study Intersections for a Typical Friday and Saturday (Alt 1-2)....2.4-91
2.4-20 Horizon Year (2035) with Project Peak-Hour Traffic Volume Adjustments: Alternative 3 Melody Road Access Alignment Project 2.4-92
2.6-1 Key View Locations: SR-94 near Melody Road....2.6-26
2.6-2 Key View Locations: SR-94 North of Maxfield Road....2.6-27
2.6-3 Key View Locations: SR-94 at Lyons Valley Road....2.6-28
2.6-4 Alternative 1: Reservation Road Access - Key View 1 Existing and Simulated Views 2.6-29
2.6-5 Alternative 1: Reservation Road Access - Key View 2 Existing and Simulated Views 2.6-30
2.6-6 Alternative 1: Reservation Road Access - Key View 3 Existing and Simulated Views 2.6-31
2.6-7 Alternative 1: Reservation Road Access - Key View 6 Existing and Simulated Views 2.6-32
2.6-8 Alternative 1: Reservation Road Access - Key View 7 Existing and Simulated Views 2.6-33
2.6-9 Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint - Key View 1 Existing and Simulated Views 2.6-34
2.6-10 Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint - Key View 2 Existing and Simulated Views 2.6-35
2.6-11 Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint - Key View 4 Existing and Simulated Views 2.6-36
2.6-12 Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint - Key View 1 Existing and Simulated Views 2.6-37
2.6-13 Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint - Key View 2 Existing and Simulated Views 2.6-38
2.6-14 Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint - Key View 1 Existing and Simulated Views 2.6-39

2.6-15 Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint - Key View 2 Existing and Simulated Views 2.6-40
2.6-16 Alternative 3: Melody Road Access – Key View 1 Existing View and Simulated View 2.6-41
2.6-17 Alternative 3: Melody Road Access – Key View 2 Existing View and Simulated View 2.6-42
2.6-18 Alternative 3: Melody Road Access – Key View 5 Existing View and Simulated View 2.6-43
2.8-1 Existing Natural Channel at SR-94 and Jamacha Road 2.8-7
2.8-2 FEMA Map of Jamacha Road Channel Encroachment....2.8-8
2.12-1 Carbon Monoxide Hotspot Receptors at the SR-94/Jamacha Blvd. and SR-94/Jamacha Rd. Intersections....2.12-18
2.12-2 Carbon Monoxide Hotspot Receptors at the SR-94/Lyons Valley Rd. Intersection....2.12-19
2.13-1 California Greenhouse Gas Forecast....2.13-5
2.13-2 Possible Effect of Traffic Operation Strategies In Reducing On-Road CO_2 Emissions....2.13-6
2.13-3 Mobility Pyramid 2.13-7
2.14-1 Noise Levels of Common Activities 2.14-13
2.14-2 Noise Measurement and Noise Receptor Locations for Jamacha Blvd. and Jamacha Rd. Intersections 2.14-14
2.14-3 Noise Measurement and Noise Receptor Locations for Steele Canyon Rd. Intersection....2.14-15
2.14-4 Noise Measurement and Noise Receptor Locations for Lyons Valley Rd. and Maxfield Rd. Intersections 2.14-16
2.14-5 Noise Measurement and Noise Receptor Locations for Melody Rd. Intersection....2.14-17
2.16-1 Vegetation Communities and Jurisdictional Waters in the Access Alternatives Project Limits (Northern Half)....2.16-14
2.16-2 Vegetation Communities and Jurisdictional Waters in the Access Alternatives Project Limits (Southern Half)....2.16-15
2.16-3 Vegetation Communities and Jurisdictional Waters in the SR-94/Jamacha Rd. Intersection Project Limits....2.16-16
2.16-4 Vegetation Communities in the SR-94/Lyons Valley Rd. Intersection Project Limits 2.16-17
2.16-5 Vegetation Communities in the SR-94/Maxfield Rd. Intersection Project Limits 2.16-18

APPENDICES

Appendix A Title VI Policy Statement

Appendix B Environmental Commitments Record (ECR)

Appendix C Letter from the Office of the Governor

Appendix D Acronyms

Appendix E CEQA Environmental Checklist

Appendix F List of Technical Reports

Appendix G Utility Conflicts

Appendix H SHPO Concurrence

Appendix I USFWS Species List

Appendix J References

CHAPTER 1.0

PROPOSED PROJECT

Chapter 1 – Proposed Project

1.1 INTRODUCTION

Caltrans is the CEQA lead agency for the Proposed Project, whose limits are defined by the SR-94 alignment between the SR-94/Jamacha Boulevard intersection and 1,800 feet south of Reservation Road, approximately one-mile south of the rural community of Jamul within unincorporated San Diego County (**Figures 1-1** and **1-2**). This chapter provides a description of the Proposed Project.

This Final EIR considers three alternative configurations of the Build Alternatives, as well as a "No Project" Alternative. The three Build Alternatives are as follows:

- Alternative 1: Reservation Road Access,
- Alternative 2: Daisy Drive Access, and
- Alternative 3: Melody Road Access.

Alternative 2: Daisy Drive Access contains three options that vary in footprint width.

Each of the Build Alternatives (sometimes referred to in this document as "Alternatives 1-3: Build Alternatives" or "Build Alternatives") includes the same set of proposed features to five existing intersections (sometimes referred to in this document as the "Non-Access Road Intersections"), as well as a different Access Road Alignment leading to the JIV Tribal lands.

The Non-Access Road Intersections applicable to each Build Alternative are as follows:

- SR-94/Jamacha Boulevard intersection,
- SR-94/Jamacha Road intersection,
- SR-94/Steele Canyon Road intersection,
- SR-94/Lyons Valley Road intersection, and
- SR-94/Maxfield Road intersection.

Proposed features at the Non-Access Road Intersections include the installation of new signals, timing modifications of existing signals, restriping of lanes, construction of retaining walls, construction/ reconstruction of new bus stops, road widening, installation of additional turning lanes and development of new acceleration/through lanes, as described in more detail below.

The three Access Road Alignments are as follows:

- Reservation Road Access Alignment – Applicable to Alternative 1: Reservation Road Access, proposed features (e.g., road widening/straightening, right/left turn lanes) would occur to existing Reservation Road from SR-94 to the JIV Tribal Lands (Figure 1-9);
- Daisy Drive Access Alignment – Applicable to Alternative 2: Daisy Drive Access, proposed features (e.g., road widening/straightening, right/left turn lanes) would occur to the existing Daisy Drive from SR-94 to the JIV Tribal Lands (Figures 1-10 through 1-12);
- Melody Road Access Alignment – Applicable to Alternative 3: Melody Road Access, a new two-lane road would be constructed from Melody Road to the JIV Tribal Lands via a vacant 87-acre parcel located west of SR-94 (Figure 1-13).

The scope of each of the Access Road Alignments includes improvements to the SR-94/Melody Road intersection, in addition to the improvement or creation of the access driveway itself. Each Access Road Alignment would also include grading, the construction of retaining walls, construction/ reconstruction of bus stops, relocation of above/below ground utilities and the construction of vegetated bio-swales.

For the reader's ease of reference, set forth in **Appendix D** is a glossary of Proposed Project-related terms and acronyms used throughout the EIR.

Existing Facility

State Route 94 is a principal route that travels generally in an east-west direction, and carries interregional, intraregional, and some international travel. The route begins near downtown San Diego as an urban freeway and major commuter route heading east where it becomes an expressway with at-grade intersections from Via Mercado to State Route 54 (SR-54). From the SR-54 intersection, SR-94 becomes a conventional highway and travels in a southeasterly direction. From Avocado Boulevard to Otay Lakes Road, SR-94 is designated as a Terminal Access Route, per the November 2013 Caltrans District 11 Truck Network Map. A terminal access route is a facility that allows access to trucks per the requirements stated in the Surface Transportation Assistance Act (STAA). East of the Sweetwater River, and in the vicinity of the Proposed Project, SR-94 is a 2-lane rural arterial serving Jamul and other outlying communities located in southeastern San Diego County. SR-94 provides access to State Route 188 (SR-188) which allows for vehicular travel to the International Border at Tecate, Mexico.

The posted speed limit for SR-94 is 55 mph throughout the Proposed Project limits. Posted speed limits for SR-94 are located at the following locations: (1) eastbound near Steele Canyon

Bridge, (2) eastbound near Daily Ranch Truck Trail, (3) westbound near Daily Ranch Truck Trail, and (4) westbound two signs near Lyons Valley Road.

Project Background

History of the JIV Gaming Development Project

In 1999, in accordance with the Indian Gaming Regulatory Act of 1988,[1] the JIV and the State of California entered into a "Tribal-State Gaming Compact" that authorizes the JIV to develop and operate a gaming facility (now known as the JIV Gaming Development Project) on the JIV Tribal lands. Section 10.8.1 of the Tribal-State Gaming Compact requires the JIV to adopt an ordinance providing for the preparation, circulation, and consideration by the Tribe of environmental impact reports concerning potential off-Tribal Lands environmental impacts of any such gaming project. Section 10.8.2(a) of the Tribal-State Gaming Compact requires the JIV to "take appropriate actions to determine whether the gaming project will have any significant adverse impacts on the off-Tribal Lands environment, and Section 10.8.2(b) requires the JIV to "make good faith efforts to mitigate any and all such significant adverse off-Tribal Lands impacts."

In 2011, the JIV adopted its Tribal Gaming Project Environmental Review Ordinance (Ordinance No. 2011-01), Section 2.1 of which requires the preparation of an environmental document to assess the off-Tribal Lands impacts associated with construction and operation of its proposed gaming facility. Among other things, Section 2.1(b) (*viii)* requires the JIV to make good faith efforts to mitigate any and all significant adverse off-Tribal Lands impacts consistent with the [JIV's] governmental interests."

In 2012, in accordance with the Tribal-State Gaming Compact and the Tribal Gaming Project Environmental Review Ordinance, the JIV prepared a Draft Tribal Environmental Evaluation, or "Draft Tribal EE," for the Gaming Development Project. Following circulation of the Draft Tribal EE, changes were made to components of the Gaming Development Project, including gaming facility square footage, parking layout, and site grading. The revised Gaming Development Project is the "Gaming Development Project" referred to in this EIR. In 2013, a Final Tribal Environmental Evaluation, or "Final Tribal EE," was produced.

The Final Tribal EE includes an analysis of both on-Tribal Lands and off-Tribal Lands environmental effects of the Gaming Development Project, in order to allow for a complete and total picture of environmental effects, and includes mitigation measures for each of the significant environmental effects identified.[2] Among other things, the Final Tribal EE concluded that operational traffic from the Gaming Development Project would result in significant direct

[1] / P.L. 100-497, codified at 18 U.S.C. Sec. 1166 et seq. and 25 U.S.C. Sec. 2701 et seq..
[2] / The Final Tribal EE has been supplemented with addenda since it was certified, but no changes have been made that are relevant to the mitigation measures addressed in this EIR.

impacts to six intersections along SR-94 (i.e., Jamacha Boulevard, Jamacha Road, Steele Canyon Road, Lyons Valley Road, Maxfield Road, and Melody Road). The Final Tribal EE also proposed mitigation measures, which required the financing and implementing of various improvements at each of those six intersections[3]. In addition, the Final Tribal EE concluded that the existing configuration of the intersection of SR-94 and the existing access driveway to the JIV Tribal Lands via Reservation Road was inconsistent with current Caltrans design standards if it were to be used as the main access to the JIV Gaming Development Project. Therefore, the Final Tribal EE also included a mitigation measure requiring the JIV to construct an improved or new Access Road Alignment.

The JIV Gaming Development Project was approved by the JIV in 2013. The JIV Gaming Development Project itself is currently under construction and is expected to be completed and opened in 2016. This EIR consists of upgrades to the seven intersections discussed above, as well as the construction of the improved or new Access Road Alignment to the Tribal Lands. These are the improvements that the Final Tribal EE determined would be required to mitigate the off-Tribal Lands traffic impacts of the Gaming Development Project. The JIV must make good faith efforts to implement these improvements, pursuant to the terms of the Tribal-State Gaming Compact and the Tribal Gaming Project Environmental Review Ordinance.

Consistency with 2050 Regional Transportation Plan

The San Diego Association of Governments (SANDAG) 2050 Regional Transportation Plan (RTP) includes corridor improvements for the rural portions of SR-94 within the limits of the Proposed Project. The Plan shows the segment of SR-94 from Jamacha Road to Steele Canyon Road to be improved from a 2-lane conventional highway to a 4-lane conventional highway under the Revenue Constrained Scenario. From Steele Canyon Road to Melody Road SR-94 would remain a 2-lane conventional highway in the Revenue Constrained Scenario. Under the unconstrained revenue scenario, the segment between Jamacha Road to Steele Canyon Road would be converted from a 2-lane conventional highway to a 6-lane conventional highway. The segment between Steele Canyon and Melody Road would be improved to a 4-lane conventional highway in the Unconstrained Scenario. From Melody Road to I-8 (which includes the frontage of the JIV Tribal Lands), SR-94 is to remain a 2-lane conventional highway in both the Revenue Constrained and Unconstrained scenarios.

The proposed SR-94 improvements are not included as part of the SANDAG's 2050 RTP; however, all improvements are consistent with, or in addition to, the improvements listed in the

[3] / Intersections other than those listed for improvement within this Final EIR were identified as being significantly impacted by JIV Gaming Development Project traffic in the Final Tribal Environmental Evaluation prepared for the JIV Gaming Development Project (2013). However, those intersections are impacted by cumulative traffic and, thus, would receive a "fair-share" contribution by the JIV to mitigate the proportionate share of the impact created by traffic from the JIV Gaming Development Project.

2050 RTP. It should be noted that the traffic volumes used for the development of SANDAG's 2050 RTP included traffic generated by the JIV Gaming Development Project.

1.2 PROJECT OBJECTIVES

1.2.1 Purpose of the Project

The purpose of the Proposed Project is to provide access and highway improvements along the SR-94 that would mitigate traffic impacts from the JIV gaming development. The Proposed Project Objectives include:

a. Provide appropriate access to and from SR-94 and the approved JIV Gaming Development Project.

b. Lessen direct traffic impacts caused by the JIV Gaming Development Project on SR-94.

c. Improve the geometric design of the main access between SR-94 and the JIV Gaming Development Project.

d. Improve the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road in a manner consistent with the SR-94 Transportation Concept Summary (TCS) and the 2050 RTP.

1.2.2 Need for the Project

Capacity and Transportation Demand

Traffic resulting from the JIV Gaming Development Project, which is currently under construction on the JIV Tribal lands, would either directly cause operating conditions at various intersections along SR-94 to fall below acceptable levels (below LOS D), would add traffic to intersections currently operating below LOS D, or would contribute to a cumulative impact at SR-94 intersections. In addition to impacted intersections, the existing configuration of the access road to the JIV Tribal lands needs to either be reconfigured or a new access road built to meet Caltrans standards. Once the JIV Gaming Development Project is completed in the spring of 2016, traffic would directly impact seven intersections along SR-94. Five of these intersections are located outside of the access road limits, while two are located within the access road limits. If these intersection/access road improvements are not in place, and the casino opens, operation of the JIV Gaming Development Project would result in a significant traffic impact to these facilities.

The level of service (LOS) for signalized intersections is defined in terms of delay. Level of service measure describes operational conditions within a traffic stream, generally in terms of such factors as speed, travel time, freedom to maneuver traffic interruption and safety. Please see **Figure 1-3** for the LOS criteria for two-lane highways.

Currently, Proposed Project intersections operate at LOS C or better during weekday and Friday/Saturday peak periods (**Table 1-1**). The exception to this is Lyons Valley Road, which currently operates at LOS E and F levels. Each intersection would operate at LOS D or worse during either the weekday or during the Friday/Saturday peak period when JIV Gaming Development Project traffic is added to the existing roadway network. In addition, the SR-94/Reservation Road intersection would also operate at LOS D or worse with the inclusion of JIV Gaming Development Project traffic in the future.

TABLE 1-1
EXISTING AND FUTURE PEAK-HOUR INTERSECTION LOS

Intersection	Existing No Build Conditions Weekday/Fri-Sat		Future (2035) with No Build Conditions Weekday/Fri-Sat[1]	
	AM	PM	AM	PM
1. SR-94/Jamacha Boulevard	B/C	C/B	C/**F**	**F/D**
2. SR-94/Jamacha Road	C/C	C/C	**E/F**	**F/F**
3. SR-94/Steele Canyon Road	C/C	C/C	**D/F**	**F**/C
4. SR-94/Lyons Valley Road	**F/F**	**F/E**	**F/F**	**F/F**
5. SR-94/Maxfield Road	B/B	B/B	**D/F**	**F/F**
6. SR-94/Melody Road[2]	B/C	B/B	**D/E**	**F/F**
7. SR-94/Reservation Road[2]	NC[3]	NC[3]	**F/F**	**F/F**

Bold denotes significant impact
[1]/ JIV Gaming Development operational traffic is included in Future (2035) Conditions
[2]/ Intersection included within the access road.
[3]/ Under this scenario, this intersection does not have conflicting movements.

Traffic volumes on SR-94 are projected to increase from 10,600 average daily trips (ADT) north of Melody Road and 7,500 ADT south of Melody Road to 17,000 ADT north of Melody Road and 13,000 ADT south of Melody Road in 2035. Per the Traffic Impact Study, the development of the JIV Gaming Development Project will result in an unacceptable LOS on SR-94 north and south of Melody Road, as well as an unacceptable peak hour LOS at the intersection of SR-94 and Melody Road, thus producing congestion and excessive delays.

Roadway Deficiencies

In addition to the significant LOS issues noted above, the Final Tribal Environmental Evaluation prepared for the JIV Gaming Development Project (Final Tribal EE, 2013) concluded that the existing geometric design of the SR-94/Reservation Road intersection, which is the main access to the JIV Tribal lands, does not meet Caltrans standards. The intersection angle, horizontal alignment, shoulder width, and corner sight distance are non-standard.

1.3 PROJECT DESCRIPTION SUMMARY

The Proposed Project is located on the SR-94 alignment between the SR-94/Jamacha Road intersection and 1,800 feet south of Reservation Road, approximately one mile south of the rural community of Jamul within unincorporated San Diego County (**Figures 1-1** and **1-2**.). The purpose of the Project is to improve access to and from SR-94 and the JIV Gaming Development Project, currently under construction, and to reduce traffic impacts to SR-94 that may be caused by the Gaming Development Project. The Proposed Project includes the improvement of five non-access road intersections:

- SR-94/Jamacha Boulevard intersection (**Figure 1-4**),
- SR-94/Jamacha Road intersection (**Figure 1-5**),
- SR-94/Steele Canyon Road intersection (**Figure 1-6**),
- SR-94/Lyons Valley Road intersection (**Figure 1-7**), and
- SR-94/Maxfield Road intersection (**Figure 1-8**).

The Proposed Project also includes improved access to the Gaming Development Project by either improving one of two existing alignments from SR-94 or constructing a new alignment from Melody Lane. There are four Proposed Project alternatives, one of which includes three separate options:

Alternative 1: Reservation Road Access (**Figure 1-9**);

Alternative 2: Daisy Drive Access (Option 1 – Full Footprint (**Figure 1-10**), Option 2 – Reduced Footprint (**Figure 1-11**), and Option 3 – Minimum Footprint, which is the environmentally superior alternative) (**Figure 1-12**);

Alternative 3: Melody Road Access (**Figure 1-13**); and.

Alternative 4: No-Project Alternative.

In addition, the Daisy Drive Access (Alternative 2), was previously approved by the JIV as its preferred alternative when the Gaming Development Project was approved in 2013.

Each of the alternatives, as well as the improvements to the five non-access road intersections, is more fully analyzed in Section 1.4 below. These alternatives are compared in Section 1.5.

Lead and Responsible Agencies

Caltrans is the Lead Agency under CEQA and is responsible for approving/denying the SR-94 Improvement Project. San Diego County and CDFW are Responsible Agencies under CEQA. Responsible Agencies comply with CEQA by considering the EIR and reaching their own conclusions on whether and how to approve the Proposed Project for permits required under their jurisdiction. Permits required from the Responsible Agencies include those listed in Section 1.7.

Intended Uses of the EIR

This EIR examines the environmental impacts of the Proposed Project. This EIR is intended to provide the public and decision-makers with sufficient information about the project and to enable the decision-makers to fully analyze the project in the approval process.

1.4 PROJECT ALTERNATIVES

This section describes the Proposed Project alternatives developed to attain the Project objectives, while avoiding or minimizing environmental impacts where feasible. Three Build Alternatives are evaluated in detail, as well as the No Project Alternative. The Build Alternatives are a range of reasonable alternatives that could meet the Purpose and Need of the Proposed Project. Each Build Alternative would include construction of improvements to the five Non-Access Road Intersections, as well as a different improved or new Access Road Alignment between SR-94 or Melody Road and the JIV Tribal Lands. The No Project Alternative assumes that no improvements are made to the Non-Access Road Intersections and no Access Road Alignment work is performed, and all of the traffic generated from the separately-approved JIV Gaming Development Project (currently under construction) is present, and enters and exits the JIV Tribal Lands at the existing Reservation Road.

1.4.1 Common Design Features of Alternatives 1-3: Build Alternatives

Alternatives 1-3: Build Alternatives share common features related to Proposed Project design. The Non-Access Road Intersections would be improved under each alternative with the features described below. These intersections include: (1) SR-94/Jamacha Boulevard intersection, (2) SR-94/Jamacha Road intersection, (3) SR-94/Steele Canyon Road intersection, (4) SR-94/Lyons Valley Road intersection, and (5) SR-94/Maxfield Road intersection. The design features presented below are not repeated under each Build Alternative discussed later in this Chapter.

Non-Access Road Intersections

SR-94/Jamacha Boulevard Intersection

Roadway Improvements

The northbound left-turn lane on Jamacha Boulevard would be restriped for a section of 1,400 feet approaching the intersection of SR-94 to become a through-shared-left-turn lane. The northbound through-shared-left-turn lane would be restriped to become a second right-turn lane. The existing lane width for each lane would be maintained as existing conditions, which are 12 feet for the inside lane and the middle lane and 14 feet for the outside lane. This improvement would require minor modifications to the existing traffic signal, including new traffic signal heads, lane designation signs, and revisions to the signal timing settings and detection system. No grading would be required for SR-94/Jamacha Boulevard intersection improvements. Construction would occur in one phase and is expected to begin in early 2016 and be completed by the summer of 2016.

The proposed improvements would affect Jamacha Boulevard (within San Diego County), while requiring modifications to the existing traffic signal (within Caltrans ROW). The SR-94/ Jamacha Boulevard intersection improvements are shown in **Figure 1-4**.

Construction Staging/Storage and Access Areas

It is anticipated that the contractor would stage/store material within the Proposed Project limits. All staging/storage areas would be located at least 25 feet from occupied residences. The staging/storage areas would require temporary lighting for night work and would be fenced. Best Management Practices would be used at the staging/storage areas to meet stormwater quality requirements. Work in staging/storage areas that generate loud noises, such as equipment maintenance, would not be allowed between the hours of 10:00 p.m. and 7:00 a.m.

Road Closures/Detours

Temporary lane closures would be required to complete the improvements. One lane of northbound Jamacha Boulevard traffic would be closed at any given time for night or weekend work, and open to traffic during peak-hour operations. Northbound traffic along Jamacha Boulevard would be maintained in the open lane. The temporary lane closures would follow traffic control standards.

Non-Standard Design Features/Easements and ROW Acquisition

No mandatory and/or advisory design exceptions are proposed with this improvement. Additionally, all work would be undertaken within the existing ROW, so no easements or right-

of-way (ROW) acquisition would be required for the SR-94/Jamacha Boulevard intersection improvements.

SR-94/Jamacha Road Intersection

Roadway Improvements

A second eastbound right-turn lane would be added to SR-94, which would require widening the south side of SR-94 by 12 feet for a length of 530 feet. The construction of a retaining wall is anticipated to support the additional roadway width. The widening would extend beyond the existing Caltrans ROW and would require ROW acquisition. The addition of the second eastbound right-turn lane would provide extra capacity for traffic from the west turning south along SR-94 (Campo Road). In addition to the new right turn lane, the proposed improvements include the reconstruction of the northbound median to provide left-turn storage capacity for the northbound left-turn movement. The median taper would be reduced to provide the additional storage while maintaining the left-turn storage for southbound left-turns into Rancho San Diego Town Center. Lastly, the proposed improvements include modifications to the existing traffic signal, including relocation of signal poles on the southwest corner of the intersection. Earthwork at the SR-94/Jamacha Road intersection is expected to balance with an estimated maximum of 750-cubic yards (cy) of cut matching the estimated maximum of 750-cy of fill. Construction would occur in one phase and is expected to begin in early 2016 and be completed by the summer of 2016.

Non-Standard Design Features

No mandatory and/or advisory design exceptions are needed for the SR-94/Jamacha Road improvements. Caltrans and San Diego County would be reviewing agencies for these proposed improvements. The SR-94/Jamacha Road intersection improvements are shown in **Figure 1-5**.

Retaining Walls

A retaining wall would be constructed to support the additional 12-foot wide right-turn lane on the south-side of SR-94. The retaining wall would be a Caltrans standard Type 1 wall, which is a structural concrete wall cantilevered on a concrete spread footing. The length of the retaining wall would be approximately 330 feet, and it would be 10 feet high at its highest point. The location of the proposed retaining wall is shown on **Figure 1-5**.

Biofiltration Swales/Drainage Improvements

One biofiltration swale (bioswale) would be constructed on the north-side of SR-94 within the existing Caltrans ROW for stormwater treatment. Runoff from the existing roadway would be conveyed to the bioswale through a sidewalk underdrain for treatment to offset the added

impervious area of the widened roadway. The dimension of the bioswale is 7 feet wide by 55 feet long. The bioswale would treat 100% of the equivalent net increase impervious area. The bioswale would be planted with native grass sod. A storm drain inlet would be placed at the end of the bioswale to capture any overflows, which would then be conveyed to the existing storm drainage system. The location of the bioswale is shown on **Figure 1-5**.

Two existing storm drains would be extended on the south side of SR-94 to accommodate the widening of SR-94 for the additional right-turn lane. The existing 18-inch culvert would be extended 5 feet and the existing 36-inch culvert would be extended 4 feet. As mentioned above under Biofiltration Swales, a bioswale would be constructed on the north-side of SR-94 within the existing Caltrans ROW. Existing flow patterns to and from the bioswale and storm drains would remain the same.

Utilities

The relocation of existing electrical and gas facilities located along SR-94 within the existing freeway to accommodate proposed intersection improvements would be required. A list of facilities to be relocated within the Proposed Project limits is provided below:

- One traffic signal cabinet on the south-side of SR-94,
- Two gas valves on the southwest side of SR-94,
- Traffic signal equipment on the southwest side of SR-94, and
- Pullbox on the southwest side of SR-94.

Construction Staging/Storage and Access Areas

It is anticipated that the contractor would stage/store material within the existing eastbound right turn lane area of the intersection, which is within the Proposed Project limits and would be closed during construction. The site would be accessed along SR-94 with openings in the k-rail. Staging/storage areas would be located at least 25 feet from occupied residences. The staging/storage areas would require lighting and would be fenced. Best Management Practices would be used at the staging/storage areas to meet stormwater quality requirements. Work in staging/storage areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.

Road Closures/Detours

A temporary lane closure of the SR-94 eastbound right-turn lane would be required for a majority of the construction period in order to complete the improvements, which could last 2 to 3 months. The exclusive right-turn lane and the southernmost eastbound lanes would be closed, the eastbound right-turn movements would use the middle eastbound lane which would be reconfigured as a shared through right-turn lane. For the construction of the raised median along

Campo Road, the northbound and southbound inside lanes would be closed. All vehicular movements would be accommodated with the use of the remaining lanes. Any temporary lane closures would follow traffic control standards.

Easements and ROW Acquisition

A temporary easement and additional ROW would be needed for the SR-94/Jamacha Road improvements. A temporary easement of 0.05 acres would be needed for the construction of the retaining wall and culvert improvements south of SR-94. Additional ROW would be required at the edges of the existing parcels abutting the existing Caltrans ROW along SR-94 near Jamacha Road. The SR-94/Jamacha Road intersection would require ROW from two parcels totaling approximately 0.28 acres for the completion of the roadway improvements. The location of the additional temporary easement and ROW needed is shown on **Figure 1-5**. The ROW details for the SR-94/Jamacha Road intersection are provided in **Table 1-2**.

TABLE 1-2
ROW DETAILS: SR-94/JAMACHA ROAD

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
506-020-3400	21.46	0.02	0.09%
506-020-3500	4.23	0.26	6.15%
Total Estimated ROW Needed		0.28	

<u>SR-94/Steele Canyon Road Intersection</u>

Roadway Improvements

SR-94 would be widened on both sides of the intersection with Steele Canyon Road to provide a second 12-foot wide through-lane and an 8-foot wide shoulder in each direction. The roadway widening would start approximately 1,000 feet west of Steele Canyon Road and would extend for approximately another 1,000 feet east of the Steele Canyon Road intersection. Widening at this location would allow additional vehicles to clear through the intersection during green-light phases and would provide additional queuing space during red-light phases. Curb and gutter improvements, utility relocation, ROW acquisition, and traffic signal modifications, including relocation of signal equipment and upgrades to pedestrian signal heads and push buttons based on the current ADA requirements would also occur at this location. Bus pads and bus stop boarding and lighted areas would be improved to current standards. Construction would occur in one phase and is expected to begin in early 2016 and be completed by the summer of 2016. The proposed SR-94/Steele Canyon Road intersection improvements are shown in **Figure 1-6**.

Retaining Walls

A retaining wall would be constructed to support additional 12-foot wide roadway width on the north-side of SR-94 east of Canfield Road. The retaining wall would be a Type 1 wall with a length of approximately 160 feet and 5 feet in height. The location of the retaining wall is shown on **Figure 1-6**.

Transit Stops

Two bus stops would be upgraded/relocated under the SR-94/Steele Canyon intersection improvements. The existing bus stop at the north side of SR-94, approximately 275 feet west of the Steele Canyon Road intersection, would be removed and reconstructed at a location approximately 50 feet west of the intersection. The existing bus stop on the south side of SR-94, approximately 100 feet east of the SR-94/Steele Canyon Road intersection, would be removed and reconstructed approximately 50 feet east of the intersection. Two new concrete bus pads 55 feet long by 8 feet wide would be installed at the new bus stop locations. Each bus boarding and alighting area would be improved with a new concrete sidewalk. Bus stop shelters would not be provided. The new bus stops would have better lighting levels since they would be closer to the intersection. The locations of the proposed transit stop modifications are shown in **Figure 1-6**.

Biofiltration Swales/Drainage Improvements

Three bioswales would be constructed within the existing Caltrans ROW for stormwater treatment. The bioswales would be trapezoidal with a top width of 5 feet for all three bioswales. One bioswale (40 feet long) would be constructed on the south-side of SR-94, approximately 450 feet west of the Steele Canyon Road intersection. One bioswale (70 feet long) would be constructed on the north side of SR-94, approximately 975 feet west of the Steele Canyon Road intersection, and one bioswale (45 feet long) would be constructed 150 feet east of the Steele Canyon Road intersection. The bioswales would be designed as described for the SR-94/Jamacha Road intersection. The locations of the proposed bioswales are shown in **Figure 1-6**.

Nine existing storm inlets would be relocated along SR-94. Six of the inlets on the north-side of SR-94 and three on the south-side would be relocated to accommodate the proposed widening. The inlet relocations would require extension of the existing storm drains. Storm drain extensions for inlet relocations would vary between 10 feet to 20 feet. As mentioned above under Biofiltration Swales, three bioswales would be constructed on the north side of SR-94 within the existing Caltrans ROW. Each proposed bioswale would require an inlet and storm drain pipe. Existing flow patterns to and from the bioswales and inlets would remain the same.

Utilities

Existing electrical, water and power/telecommunications lines located along SR-94 within the existing freeway would need to be relocated to accommodate proposed intersection improvements. A list of facilities to be relocated within the Proposed Project limits is provided below:

- Relocate eleven San Diego Gas & Electric (SDG&E) power poles and telecommunication poles on the north-side and seven on the south-side of SR-94,
- One electric vault on the north-side and one on the south-side of SR-94,
- One traffic signal cabinet on the north side of SR-94,
- Two water valves on the north-side and one on the south-side of SR-94,
- One electrical service cabinet on the north-side,
- Five pull boxes on the north-side and four on the south-side of SR-94, and
- Three water meters on the south side of SR-94.

Construction Staging/Storage and Access Areas

Three major construction phases are anticipated for the completion of the proposed improvements at the SR-94/Steele Canyon Road intersection. The contractor would utilize the designated work area within the Proposed Project limits as construction staging/storage areas. Access to each construction area would be provided along SR-94 with openings in the k-rail. The first phase of construction would be the south side of the roadway, where the eastbound lane would be closed and vehicular traffic would be shifted to the north. Once this phase is completed, the work would be shifted to the north side of the roadway, west of the SR-94/Steele Canyon intersection. The westbound travel lane would be closed and vehicular traffic would shift to the south. The third major construction phase would be at the north side of the roadway, east of the Steele Canyon Road intersection. The westbound travel lane would be closed and vehicular traffic would shift to the south. The staging/storage areas would require temporary lighting for night work and would be fenced. Best Management Practices (BMPs) would be used at the staging/storage areas to meet stormwater quality requirements. Work in staging/storage areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.

Road Closures/Detours

Temporary lane closures would be required to complete the improvements at the Steele Canyon Road intersection, which could last four to six months. The temporary lane closures would be completed following traffic control standards.

Non-Standard Design Features

The proposed non-standard design features are summarized below:

1. Embankment (fill) slopes steeper than 4:1 are proposed within the clear recovery zone.
2. Embankment (fill) slopes catch existing ground closer than 18 feet from the edge of shoulder.

Easements and ROW Acquisition

Both temporary easements and ROW acquisition would be required for the SR-94/Steele Canyon Road intersection improvements. Approximately 0.25 acres of temporary construction easements would be needed for construction of a retaining wall on the north side of SR-94 and reconstruction of driveways and parking areas on both the north and south sides of SR-94. Additional ROW would be required at the edges of the existing parcels abutting the existing Caltrans ROW on both approaches to Steele Canyon Road. The SR-94/Steele Canyon Road intersection would require ROW from six parcels totaling 0.414 acres for the completion of the roadway improvements and utility relocation. The locations of the temporary easements and ROW needed are shown on **Figure 1-6**. The ROW details for the SR-94/Steele Canyon Road intersection are provided in **Table 1-3**.

TABLE 1-3
PROPOSED ROW ACQUISITION:
SR-94/STEELE CANYON ROAD

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
596-231-2300	0.585	0.004	0.68%
596-231-2500	1.26	0.1	7.94%
596-040-0200	1.98	0.09	4.55%
596-040-6900	2.28	0.09	3.95%
596-040-3900	0.93	0.09	9.68%
596-040-6800	14.66	0.04	0.27%
Total Estimated ROW Needed		0.414	

SR-94/Lyons Valley Road Intersection

Roadway Improvements

A traffic signal would be installed at this location to reduce delays for traffic turning from Lyons Valley Road onto SR-94. The new signal would include pedestrian signal heads and push buttons based on the current ADA requirements. The signal would be equipped with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). Traffic signal equipment such as a detection system, conduits, and pull boxes would be installed within San Diego County's ROW. Tree and/or brush removal would be required on 0.2 acres to provide adequate sight distance to the new signal. The vegetation removal would extend beyond the existing Caltrans ROW and would require additional ROW. No grading would be required for SR-94/Lyons Valley Road intersection improvements. Construction would occur in one phase and is expected to begin in early 2016 and be completed in the summer of 2016.

Construction Staging/Storage and Access Areas

It is anticipated that the contractor would stage/store material within the Proposed Project limits. Staging/storage areas would be located at least 25 feet from occupied residences. The staging/storage areas would require temporary lighting for night work and fencing would be installed to keep the public out of these areas. Best Management Practices would be used at the staging/storage areas to meet stormwater quality requirements. Work in staging/storage areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.

Road Closures/Detours

Temporary lane closures and shoulder closures would be required to complete the improvements at the SR-94/Lyons Valley intersection. The temporary lane and shoulder closures would be completed following traffic control standards. One lane of traffic for each direction would be maintained during construction at all times. Business and residential access would be maintained at all times. Lane closures along SR-94 would be limited to restricted working hours to be provided by Caltrans prior to construction.

Non-Standard Design Features

One exception to Caltrans design features is required for the SR-94/Lyons Valley Road improvements. The design speed of 45 mph is proposed for the existing curve west of Lyons Valley Road along SR-94. This would maintain existing geometrics along this curve.

ROW Acquisition

ROW acquisition would be required for the SR-94/Lyons Valley Road intersection improvements. Additional ROW would be required at the edge of an existing parcel (596-071-6100) abutting the existing Caltrans ROW on the south side of SR-94. The SR-94/ Lyons Valley Road intersection would require 0.082 acres of additional ROW for the removal of trees and/or brush to provide adequate sight distance. The ROW needed is 1.09 percent of the 7.54-acre parcel. This Final EIR provides updated impact totals within the relevant sections of the document.

The SR-94/Lyons Valley Road intersection improvements are shown in **Figure 1-7**.

<u>SR-94/Maxfield Road Intersection</u>

Roadway Improvements

State Route 94 would be widened west of Maxfield Road to provide a 12-foot wide acceleration lane for vehicles turning left from Maxfield Road onto westbound SR-94. The new acceleration lane would have a total length of 950 feet. Following the new acceleration lane, there would be a lane drop section of the road for approximately 650 feet. The existing westbound and eastbound through lanes would be restriped to provide adequate room for the acceleration lane. This feature would allow vehicles turning left from Maxfield Road to turn once they find an adequate gap in eastbound traffic and have time to accelerate and merge into westbound traffic. Bus pads and bus stop boarding and lighted areas would also be improved to current standards. Total estimated maximum cut for the SR-94/Maxfield Road improvements is 16,250 cubic yards (cy), while estimated maximum fill is 2,250-cy. The excess cut would be transported off-site to a licensed disposal facility. Construction would occur in one phase and is expected to begin in early 2016 and be completed in the summer of 2016. The SR-94/Maxfield Road improvements are shown on **Figure 1-8**.

Retaining Wall

A retaining wall would be constructed 10 feet in height to improve site distance on the south-side of SR-94. The retaining wall would be a Type 1 wall with a length of approximately 340 feet. The location of the proposed retaining wall is shown on **Figure 1-8**.

Transit Stops

One upgraded and one new bus stop would be constructed at the SR-94/Maxfield Road intersection. The existing bus stop boarding and lighted area located approximately 75 feet north of the intersection on the west side of SR-94 would be upgraded with a new concrete pad 55 feet long by 8 feet wide. A new bus stop boarding and lighted area would also be constructed

approximately 100 feet north of the intersection on the east side, where a new concrete bus pad 55 feet long by 8 feet wide would be constructed. The locations of the proposed bus stop modifications are shown on **Figure 1-8**.

Biofiltration Swales/Drainage Improvements

Two bioswales would be constructed within the existing Caltrans ROW for stormwater treatment. The bioswales would be trapezoidal in design with a top width of 5 feet. One bioswale (65 feet long) is proposed for the south-side of SR-94 approximately 1,000 feet northwest of the SR-94/Maxfield Road intersection, while the second (65 feet long) is located on the west side of SR-94 approximately 75 feet north of the Maxfield Road intersection. The bioswales would be designed as described for the SR-94/Jamacha Road intersection. The locations of the proposed bioswales are shown in **Figure 1-8**.

One existing culvert parallel to SR-94 would be replaced, while one existing culvert under SR-94 would be extended. The culvert replacement would be located under a private driveway east of SR-94, approximately 1,500 feet north of Maxfield Road. The culvert replacement would be with an 18-inch pipe approximately 66 feet long. The second culvert extension is located 1,150 feet north of Maxfield Road. The existing 18-inch culvert would require a 20-foot extension on the upstream end of the pipe and a 15-foot extension on the downstream end of the pipe. As mentioned above under Biofiltration Swales, two bioswales would be constructed on the north side of SR-94 within the existing Caltrans ROW.

Utilities

Existing electrical and power/telecommunications lines located along SR-94 within the existing freeway would be relocated to accommodate Proposed Project features. A list of facilities to be relocated within the Proposed Project limits is provided below:

- Relocate five power poles and telecommunication poles on the north-side of SR-94,
- One electric box on the north-side of SR-94, and
- Two pull boxes on the north-side of SR-94.

Construction Staging/Storage and Access Areas

Two major construction phases are anticipated for the completion of the improvements at the SR-94/Maxfield Road intersection. The contractor would utilize the designated work area within the Proposed Project limits as construction staging/storage areas. Access to each construction area would be provided along SR 94 with openings in the k-rail. The first phase of construction would be the north side of the roadway, where the westbound lane would be closed and vehicular traffic would be shifted to the south. Once this phase is completed, the work would shift to the

south side of the roadway, west of the SR-94/Maxfield Road intersection. Additional smaller construction phases are anticipated for tie ends and minor construction areas.

Road Closures/Detours

Temporary lane closures would be required to complete the improvements at Maxfield Road. The temporary lane closures would be completed following traffic control standards.

Two major construction phases are anticipated for the completion of this work. The first phase of construction would be the north side of the roadway, where the westbound lane would be closed and vehicular traffic would shift to the south. Once this phase is completed, the work would shift to the south side of the roadway, west of the SR-94/Maxfield Road intersection.

Non-Standard Design Features

The proposed non-standard design features are summarized below:

1. Embankment (fill) slopes steeper than 4:1 are proposed within the clear recovery zone.
2. Embankment (fill) slopes catch existing ground closer than 18 feet from the edge of shoulder.

Easements and ROW Acquisition

Temporary easements and ROW acquisition would be required for the SR-94/Maxfield Road improvements. Approximately 0.04 acres of temporary construction easement would be needed for reconstruction of an existing driveway located at the north-western end of the improvements. Additional ROW would be required at the edges of the existing parcels abutting the existing Caltrans ROW near Maxfield Road. The SR-94/Maxfield Road intersection would require ROW from two parcels totaling 0.18 acres for the completion of the roadway improvements and utility relocations. The additional ROW would be needed along the north-western end of the roadway. The location of the additional temporary easement and ROW needed is shown on **Figure 1-8**. The ROW details for the SR-94/Maxfield Road intersection are provided in **Table 1-4**.

TABLE 1-4
PROPOSED ROW ACQUISITION:
SR-94/MAXFIELD CANYON ROAD

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
596-180-02-00	18.83	0.17	0.9%
596-180-01-00	141.7	0.01	<0.01%
Total Estimated ROW Needed		0.18	

Transit Stops

The new and reconstructed bus stops include these design specifics:

- The sidewalk width adjacent to the bus stop location shall be 6 feet minimum and meet ADA requirements,

- A concrete bus pad is required at the location where the buses would stop with a minimum length of 80 feet by a width of 12 feet,

- The concrete bus pad must be 8 inches thick with rebar,

- The minimum length of bus stop locations at the far side of the intersection must be 80 feet, and

- The minimum length of the bus stop locations at the near side of the intersection must be 100 feet.

For locations that currently have a bus stop, temporary bus stop locations would be established during construction in coordination with the Metropolitan Transit System (MTS). While facilities are being constructed, temporary bus stops are expected to include a new sign at the temporary location where the bus would stop.

1.4.2 Alternative 1: Reservation Road Access

Alternative 1: Reservation Road Access **(Figure 1-9)** would provide access to the JIV Gaming Development Project via the existing Reservation Road. This alternative also includes improvements to SR-94, as well as improvements at the SR-94/Melody Road intersection and SR-94/Reservation Road intersection. Alternative 1: Reservation Road Access includes both the construction of the Common Design Features (including the Non-Access Road Intersections) described in Section 1.4.1, as well as the Reservation Road Access Alignment described below. Reference below is made to the "Reservation Road Access Alignment" or "Access Road Alignment" given that the Access Road Alignment component of this alternative is detailed in this section.

The Reservation Road Access Alignment would include improvements to SR-94 from approximately 1,200 feet north of Melody Road to approximately 1,800 feet south of Reservation Road, for a total length of approximately 0.89 miles. This section of SR-94 would be realigned to provide flatter horizontal and vertical curvature, as well as pavement cross slope and super-elevation. Lanes and shoulders would be widened to also meet current standards. The proposed angle of intersection at this location would require an advisory design exception to the Caltrans Highway Design Manual standards.

Traffic signals would be installed at the SR-94/Melody Road intersection, and also at the SR-94/Reservation Road intersection — the proposed JIV Tribal Lands access location for this Access Road Alignment. The signals would be equipped with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). Exclusive left-turn lanes would be provided along SR-94 at the SR-94/Melody Road/Peaceful Valley Ranch Road intersection for northbound vehicles turning west onto Melody Road, and for southbound vehicles to turn east onto Peaceful Valley Ranch Road. Likewise, an exclusive left-turn lane would be provided for northbound vehicles turning west onto Reservation Road. In addition, a second southbound through lane would be provided along SR-94 between Melody Road and Reservation Road. The Reservation Road Access Alignment also would widen Melody Road and Peaceful Valley Ranch Road to provide exclusive left-turn lanes onto SR-94 for overall improved intersection operation. The length of roadway needed for the improvements along Melody Road and Peaceful Valley Ranch Road are approximately 700 feet and 500 feet, respectively.

The SR-94/Reservation Road intersection also would be reconfigured to meet current Caltrans design standards (due to the curved nature of the intersection reconfiguration the angle of intersection is measured with respect to the location of the limit line on Reservation Road). The existing angle of the intersection would not accommodate the increased traffic demand at this intersection for this Access Road Alignment. This reconfiguration of the intersection would shift the SR-94 alignment to the east of the existing highway, which would result in increased ROW needs.

Two intersections, the SR-94/Melody Road intersection and the SR-94/Reservation Road intersection, would be modified. The design and location of the SR-94/Melody Road intersection improvements are influenced by the access road improvement, because the intersection is located within the access road improvement alignment. At the SR-94/Melody Road intersection, a second 12-foot southbound travel lane would be added with a length of approximately 250 feet. The southbound left-turn lane would be extended to provide a total combination of deceleration and storage length of 550 feet. Along Melody Road, a new 12-foot left turn lane would be added with a total deceleration and storage length of 350 feet. Along Peaceful Valley Ranch Road, a 12-foot westbound left-turn lane would be added with a total deceleration and storage length of approximately 150 feet. A new 12-foot northbound lane would be added with a total deceleration and storage length of 700 feet.

Other SR-94/Melody-Peaceful Valley Ranch Road intersection improvements include:

- Restriping to provide additional turn lanes,
- Roadway realignment and widening to provide additional turn lanes,
- Shoulder, curb and gutter reconstruction,
- Utility relocation,

- Pedestrian ramps construction,
- Pavement reconstruction (including excavation, repaving and restriping),
- Drainage improvements, and
- Reconstruction of Melody Road culvert.

At the SR-94/Reservation Road intersection, the second southbound lane on SR-94 added at the SR-94/Melody Road intersection would become an exclusive right-turn lane onto the JIV Gaming Development Project site. The total length of this lane from Melody Road to the JIV Gaming Development Project entrance would be approximately 1,650 feet. In addition, at Reservation Road, a 12-foot northbound left-turn lane would be added with a total deceleration and storage length of approximately 700 feet. Coming off the JIV Tribal Lands site, two 12-foot left-turn lanes and a 12-foot right-turn lane would be provided on Reservation Road itself, located on the JIV Tribal Lands.

Construction Schedule

A combination of short, intermediate, and long-term stationary work is anticipated during construction of the proposed improvements. To minimize traffic disturbance and maintain traffic movements on SR-94, detailed stage construction and traffic handling plans would be prepared during development of the final plans, specifications and estimate (PS&E) for this Proposed Project. The Access Road Alignment would be constructed in three major stages lasting a total of 15 months.

Stage 1: While maintaining traffic along the existing roadway, the portion of proposed SR-94 along the northeast side of the existing alignment from just north of Peaceful Valley Ranch Road to just south of Daisy Drive would be constructed. This 6-month stage would include construction of the retaining walls south of Peaceful Valley Ranch Road, as well as relocation of the existing overhead utilities. Access to Peaceful Valley Ranch Road and Melody Road would be maintained.

Stage 2: In this stage, the traffic would be shifted from the existing roadway to the portion of SR-94 built in Stage 1. This 6-month stage would involve construction of the southwest portion of SR-94 along the existing alignment. During this stage, Melody Road would be closed to traffic to construct the Proposed Project features. Traffic would be detoured to Proctor Valley Road.

Stage 3: During this 3-month stage, the remaining portion of SR-94 at the north and south end of SR-94 would be constructed. Included in this stage are minimal grading, widening, and overlay operations. Melody Road would be opened in this stage.

Retaining Walls

A total of seven retaining walls are proposed for Reservation Road Access Road Alignment in order to minimize right-of-way requirements and environmental impacts. Three walls would be constructed on the east-side of SR-94 between the SR-94/Peaceful Valley Ranch Road intersection and the SR-94/Reservation Road intersection to accommodate the realignment and widening of SR-94. These walls would be contained on a property that is burdened by an Irrevocable Offer of Dedication for Caltrans Highway purposes (the IOD Land). The IOD Land extends from Peaceful Valley Ranch Road in the north to Hollenbeck Wildlife Preserve in the south. The retaining walls in this location would total approximately 1,200 feet in combined length, and would vary in height from about 10 feet to 20 feet. These walls would be Caltrans standard Type 1 walls or soil nail walls. One retaining wall approximately 350 feet in length and 6 feet in height would be required along the west side of SR-94 south of the SR-94/Melody Road intersection, also to accommodate improvements of SR-94. This wall would be a Caltrans standard Type 1 wall.

One retaining wall approximately 200 feet in length and varying in height from about 8 feet to 16 feet would also be constructed on the south-side of Melody Road near the intersection with SR-94. This wall would accommodate realignment and widening of Melody Road. This wall would be a Caltrans standard Type 1 wall. Two other retaining walls, less than 6 feet in height, would also be constructed to minimize ROW impacts. The locations of the retaining walls are identified on **Figure 1-9 (Sheets 2-4).**

Transit Stops

Two new bus stops would be installed near the access to JIV at Reservation Road: (1) east side of SR-94 approximately 50 feet north of Reservation Road, and (2) west side of SR-94 approximately 25 feet south of Reservation Road. New concrete bus pads would measure 55 feet long by 8 feet wide would be installed at the proposed bus stop locations. Each bus boarding and alighting area would be improved with a new concrete sidewalk. Bus stop shelters would not be provided. The new bus stops would be closer to the intersection where improved lighting exists. Pedestrians would have access along the road shoulder or along a dirt path. There are currently no bus stops at these locations. The locations of the transit stops are shown on **Figure 1-9 (Sheet 4)**.

Bioswales/Drainage Improvements

Five bioswales would be constructed within the Caltrans and San Diego County ROW for stormwater treatment. Three bioswales would be constructed within the Caltrans ROW (one north of Melody Road and two south of Melody Road) and two within the San Diego County ROW (north and south of Melody Road). The bioswale located to the north of Melody Road along SR-94 would be 5 feet wide and 150 feet long. The bioswales located to the north and

south of Melody Road would be 5 feet wide and 60 feet long. The bioswales along SR-94 south of Melody Road would both be 6 feet wide and 105 feet long. The bioswales would be designed as described for the SR-94/Jamacha Road intersection. The locations of the bioswales are identified on **Figure 1-9 (Sheets 2-3)**.

An existing box culvert under Melody Road would be replaced with a bottomless culvert to create a natural creek bed in Willow Creek under Melody Road. This culvert is anticipated to be a precast arch structure that would span approximately 36 feet with a width of 90 feet. The Proposed Project would maintain or increase the height of the existing pipe culvert at Melody Road that serves as a passageway for animals. The culvert would include a bank or bench above the normal water level (bank full condition) on at least one side (i.e., out of the low flow channel) through the culvert to facilitate wildlife movement.

Other drainage improvements consist of constructing new drainage inlets and storm drain facilities at all low points and superelevation[4] transition areas, where the roadway cross-slope changes; installing bioswales for stormwater treatment; and installing ditches for hillside areas. There are five existing culverts within the Proposed Project site. Two of these culverts that cross SR-94 south of Melody Road would be reconstructed to accommodate the roadway improvements. The 12-inch culvert would be upsized to a 24-inch culvert. The 18-inch culvert would be upsized to a 36-inch culvert. Another culvert under a private driveway adjacent to SR-94 approximately 630 feet north of Melody Road would also be reconstructed. The existing culvert would be removed and replaced with the same size culvert. Existing culverts would be sized so that drainage paths accommodate the existing flow rate and additional stormwater flows from the improvement Proposed Project. As mentioned above, an existing box culvert under Melody Road would be replaced with a bottomless culvert to provide a natural creek bed to Willow Creek under Melody Road.

Utilities

Existing utilities such as electrical overhead, communication lines, and water lines would be impacted by the construction of the improvements under this Access Road Alignment. Existing electrical and communication overhead utilities owned by SDG&E and Cox Communications are longitudinally adjacent to SR-94 along the east side of the existing highway. Along the west side of the highway are the existing communication overheads owned by AT&T. These facilities are anticipated to be impacted by this Proposed Project and are proposed to be relocated to a combined overhead facility along the east side of the proposed alignment. SDGE would lead the relocation of the power poles and would accommodate AT&T and Cox telecommunication lines on SDGE poles.

[4] / Superelevation is the rotation of the pavement on the approach to and through a horizontal curve. Superelevation is intended to assist the driver by counteracting the lateral acceleration produced by tracking the curve.

Combinations of 12-inch and 16-inch water mains owned by the Otay Water District are also within the Proposed Project limits. These facilities are located under the existing pavement along SR-94. The water-line profile elevations would be adjusted in select locations to accommodate the highway's change of grade.

Construction Staging/Storage and Access Areas

Staging/storage areas would be located within the Proposed Project limits, as well as upon a four-acre parcel (Daisy Drive parcel) adjacent to SR-94 north of Reservation Road. Staging/storage areas would be located at least 25 feet from occupied residences. The staging/storage areas would require lighting and would be fenced. Best Management Practices would be used at the staging/storage areas to meet stormwater quality requirements. Work in staging/storage areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.

Road Closures/Detours

No prolonged closures are expected for SR-94. The existing lanes on SR-94 would be maintained during construction. Temporary lane closures would be necessary to move barriers, re-stripe roadway, move heavy equipment, etc. These temporary lane closures would be completed following traffic control standards.

During reconstruction of Melody Road, an alternative route would be required for closure of Melody Road at the intersection with SR-94. Proctor Valley Road would be utilized to detour traffic that currently uses the SR-94/Melody Road intersection. Detour signs and construction area signs would be provided to direct traffic during the closure of Melody Road. The duration of the closure for Melody Road is estimated to be 6 months.

Easements and ROW Acquisition

Right-of-way acquisition, permanent easement and temporary easements would be required for Reservation Road Access Alignment. This Access Road Alignment would require ROW from ten parcels totaling 5.63 acres. This Access Road Alignment results in no displacement of land owners. A total of 0.16 acres would be acquired from residential properties north of Peaceful Valley Ranch Road and Melody Road. A total of 0.38 acres would be needed from the 10-acre property northwest of the SR-94/Melody Road intersection, while 0.53 acres would be needed from the 87-acre parcel located southwest of the SR-94/Melody Road intersection.

The reconfiguration of the SR-94/Reservation Road intersection would shift the SR-94 alignment to the east of the existing highway, which would result in the need to acquire 1.8 acres of ROW from the CDFW property south of Reservation Road as shown in **Figure 1-9 (Sheet 4)**.

Two parcels totaling 2.5 acres, part of the IOD Land, would be required for this Access Road Alignment. These parcels are located along the east side of SR-94 south of Peaceful Valley Ranch Road.

Permanent easement required for Reservation Road Access Alignment would include utility easements, drainage easement and footing easements. A total of 0.08 acres would be required for utility easements. A total of 0.10 acres would be required for drainage easements. A total of 0.50 acres would be required for footing easements for proposed retaining walls.

Temporary easements would be acquired to allow access to construct the improvements. A total of 0.66 acres of temporary easements would be required for this Access Road Alignment. The ROW details for Reservation Road Access Alignment are provided in **Table 1-5**.

TABLE 1-5
PROPOSED ROW ACQUISITION:
ALTERNATIVE 1: RESERVATION ROAD ACCESS

APN	Parcel Size (acres)	ROW Needed (acres)	ROW Needed as % of Parcel Size
597-041-2600	8.02	0.03	0.37%
597-041-4400	1.36	0.12	8.82%
597-041-4000	1.36	0.24	17.65%
597-041-1500	5.62	0.01	0.18%
597-060-0200	28.85	2.49	8.63%
597-042-1300	10.34	0.38	3.68%
597-060-0500	86.03	0.53	0.62%
597-080-0500	1.54	0.03	1.95%
597-080-800	68.16	1.72	2.52%
597-160-0400	79.91	0.08	0.10%
Total Estimated ROW Needed		5.63	

1.4.3 Alternative 2: Daisy Drive Access

Alternative 2: Daisy Drive Access would provide primary access to the JIV Gaming Facility by means of the existing Daisy Drive. This alternative includes improvements to SR-94, as well as improvements at the SR-94/Melody Road intersection. This alternative has been further divided into three different options **(Figures 1-10 through 1-12)**, each of which intersects differently with SR-94. All options for this alternative include construction of the Common Design Features (including the Non-Access Road Intersections), as described in detail in Section 1.4.1.

The Daisy Road Access Alignment includes improvements along SR-94 from an area north of Melody Road to an area south of the JIV Tribal Lands. In addition, the existing Daisy Drive

located on the 4-acre parcel north of the JIV Tribal Lands would be improved to the Tribal Lands boundary. The existing Daisy Drive connects the JIV Tribal Lands to SR-94 via a two-lane paved facility. Three options using the same entrance are addressed under this alternative. While maintaining the same entrance, each option disturbs differing areas and has different environmental impacts and ROW requirements. Locating the access point at Daisy Drive would decrease the intersection spacing to Melody Road, but also would shorten the Proposed Project limits at the southern end. The realignment of SR-94 under this alternative would maintain an alignment on the west side of existing SR-94, south of Daisy Drive, which would result in one less horizontal curve along SR-94 within the Proposed Project limits. Under this alternative, the existing Reservation Road would be fitted with removable bollards and used only for emergency purposes.

Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint

Alternative 2: Daisy Drive Access; Option 1 Full Footprint includes both the construction of the Common Design Features (including the Non-Access Road Intersections) described in Section 1.4.1, as well as the Daisy Drive Access Alignment; Option 1 Full Footprint described below. Reference below is made to the "Daisy Drive Access Alignment: Option 1 Full Footprint" or "Access Road Alignment" given that the Access Road Alignment component of this alternative is detailed.

The Daisy Drive Access Alignment; Option 1 Full Footprint (**Figure 1-10**) would improve SR-94 from approximately 1,200 feet north of Melody Road to approximately 1,400 feet south of existing Reservation Road, for a total length of approximately 0.82 miles. Similar to the Reservation Road Access Alignment, SR-94 would be realigned and widened as part of this Access Road Alignment. No design exceptions to Caltrans' design standards would be needed for the Daisy Drive Access Alignment; Option 1 Full Footprint.

As part of this improvement, two new traffic signals would be installed, one at the SR-94/Melody Road and a second at the SR-94/Daisy Drive intersection. The signals would be equipped with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). At the SR-94/Melody Road intersection, a second 12-foot southbound travel lane would be added with a length of approximately 150 feet. The southbound left-turn lane would be extended to provide a total combination of deceleration and storage length of 550 feet. Along Melody Road, a new 12-foot left turn lane would be added with a total deceleration and storage length of 350 feet. Along Peaceful Valley Ranch Road, a 12-foot westbound left-turn lane would be added with a total deceleration and storage length of approximately 150 feet. A new 12-foot northbound lane would be added with a total deceleration and storage length of 700 feet.

At the SR-94/Daisy Drive intersection, the second southbound lane added at the SR-94/Melody Road intersection would become an exclusive right-turn lane onto the JIV Gaming Development Proposed Project site. The total length of this lane from the SR-94/Melody Road intersection to the JIV Gaming Development Project entrance would be approximately 1,150 feet. In addition, at Reservation Road, a 12-foot northbound left-turn lane would be added with a total deceleration and storage length of approximately 700 feet. Coming from Daisy Drive to SR-94, two 12-foot left-turn lanes and a 12-foot right-turn lane would be provided on Daisy Drive.

Construction Schedule

See page 1-20 *Construction Schedule* for Alternative 1: Reservation Road Access.

Retaining Walls

Three retaining walls would be constructed as part of the Daisy Drive Access Alignment; Option 1 Full Footprint. Two retaining walls would be located along the east-side of SR-94, between Peaceful Valley Ranch Road and Daisy Drive to accommodate the realignment and widening of SR-94. These walls would be within the IOD Land. These walls would be approximately 750 feet in combined length and would vary in height from about 10 feet to 16 feet. These walls are anticipated to be Caltrans standard Type 1 walls or soil nail walls. One retaining wall approximately 200 feet in length varying in height from about 8 feet to 16 feet would also be constructed along the south side of Melody Road near the intersection with SR-94. This wall would accommodate realignment and widening of Melody Road. This wall is anticipated to be Caltrans standard Type 1 wall. The locations of the retaining walls are identified on **Figure 1-10 (Sheets 2 and 3)**.

Transit Stops

Two bus stops would be installed near the access to JIV at Daisy Drive: (1) east side of SR-94 immediately north of Daisy Drive, and (2) west side of SR-94 approximately 25 feet south of Daisy Drive. Bus stop details provided for Alternative 1: Reservation Road Access applies to this Access Road Alignment. There are currently no bus stops at these locations. The locations of transit stops are identified on **Figure 1-10** Daisy Drive Access Alignment; Option 1 Full Footprint.

Biofiltration Swales/Drainage Improvements

Six bioswales would be constructed within the Caltrans and San Diego County ROW for stormwater treatment. Three bioswales would be constructed within the Caltrans ROW (one north of Melody Road and two south of Melody Road) and three within the San Diego County ROW (Peaceful Valley Ranch Road and Melody Road). The bioswale located to the north of Melody Road along SR-94 would be 5 feet wide and 150 feet long. The bioswales located to the

north and south of Melody Road along Melody Road would be 5 feet wide and 60 feet long. The bioswales along SR-94 south of Melody Road would be 6 feet wide and 105 feet long. The bioswales would be designed as described for the SR-94/Jamacha Road intersection. The locations of the bioswales are identified on **Figure 1-10 (Sheets 2-3)**.

An existing box culvert under Melody Road would be reconstructed with a bottomless culvert to provide a natural creek bed to Willow Creek under Melody Road. The Proposed Project would maintain or increase the height of the existing pipe culvert at Melody Road that serves as a passage way for animals. The culvert would include a bank or bench above the normal water level (bank full condition) on at least one side (i.e., out of the low flow channel) through the culvert to facilitate wildlife movement.

Other drainage improvements for this Access Road Alignment would be the same as described for Alternative 1: Reservation Road Access.

Utilities

Existing utilities such as electrical overhead, communication lines, and water lines would be impacted under this Access Road Alignment. Existing electrical and communication overhead utilities owned by SDG&E and Cox Communications are longitudinally adjacent to SR-94 along the east side of the existing highway. These facilities are anticipated to be impacted by this Access Road Alignment and are proposed to be relocated to a combined overhead facility along the east side of the proposed alignment. SDGE would relocate the power poles and would accommodate AT&T and Cox telecommunication lines on SDGE poles.

Combinations of 12-inch and 16-inch water mains owned by the Otay Water District are also within the Proposed Project limits. These facilities are anticipated to be protected in place and relocated in certain locations to accommodate the highway realignment.

Construction Staging/Storage and Access Areas

See page 1-23 *Construction Staging/Storage and Access Areas* for Alternative 1: Reservation Road Access.

Road Closures/Detours

See page 1-23 *Road Closures/Detours* for Alternative 1: Reservation Road Access.

Easements and ROW Acquisition

ROW acquisition, permanent easement and temporary easements would be required for the Daisy Drive Access Alignment; Option 1 Full Footprint. This Access Road Alignment would require ROW from 10 parcels totaling 5.85 acres. This Access Road Alignment results in no

displacement of land owners. A total of 0.32 acres would be needed from residential properties north of Peaceful Valley Ranch Road and Melody Road. Additionally, 0.41 acres would be acquired from the 10-acre property northwest of the SR-94/Melody Road intersection, and 0.63 acres would be acquired from the 87-acre property southwest of the SR-94/Melody Road intersection. A total of 1.1 acres would be needed from CDFW property southeast of Reservation Road as shown in **Figure 1-10**. After the Draft EIR was released, the alignment of SR-94 was revised to avoid acquisition within the Rancho Jamul Ecological Reserve on the west side of SR-94. The revised alignment stayed within the previous area of impact identified and analyzed in the Draft EIR. The total acreage impacted from this adjustment was reduced from 6.34+/- acres to 5.85+/- acres. While the realignment changed areage numbers, the significance of impacts was not changed. This Final EIR provides updated impact totals within the relevant sections of the document. Lastly, the IOD ROW impacts are similar to Alternative 1: Reservation Road Access.

Permanent easements required for Daisy Drive Access Alignment; Option 1 Full Footprint would include utility easements, drainage easement and footing easements. A total of 0.1 acres would be required for utility easements. A total of 0.06 acres would be required for drainage easements. A total of 0.47 acres would be required for footing easements for proposed retaining walls.

Temporary easements would be needed to allow construction of the improvements. A total of 0.75 acres of temporary easements would be required for this Access Road Alignment. The ROW details for Daisy Drive Access Alignment; Option 1 Full Footprint are provided in **Table 1-6**.

TABLE 1-6
PROPOSED ROW ACQUISITION: PREFERRED ALTERNATIVE – ALTERNATIVE 2: DAISY DRIVE ACCESS; OPTION 1 FULL FOOTPRINT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-041-2600	8.02	0.01	0.12%
597-041-4400	1.36	0.09	6.62%
597-041-4000	1.36	0.24	17.65%
597-041-5800	1.82	0.09	4.95%
597-041-1500	5.62	0.13	2.31%
597-060-0200	28.85	2.86	9.91%
597-042-1300	10.34	0.41	3.97%
597-060-0500	86.03	0.63	0.73%
597-060-0400	4.35	0.33	7.59%
597-080-800	68.16	1.06	1.56%
Total Estimated ROW Needed		5.85	

Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint

Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint includes both the construction of the Common Design Features (including the Non-Access Road Intersections) described in Section 1.4.1, as well as the Daisy Drive Access Alignment; Option 2 Reduced Footprint described below. Reference below is made to the "Daisy Drive Access Alignment: Option 2 Reduced Footprint" or "Access Road Alignment" given that the Access Road Alignment component of this alternative is detailed.

The Daisy Drive Access Alignment; Option 2 Reduced Footprint (**Figure 1-11**) would improve SR-94 from about 1,200 feet north of Melody Road to about 1,400 feet south of existing Reservation Road, for a total length of approximately 0.82 miles. The Proposed Project limits north and south along SR-94 would be the same as stated for Alternative 2: Daisy Drive Access; Option 1 Full Footprint. The Daisy Drive Access Alignment; Option 2 Reduced Footprint differs from the Daisy Drive Access Alignment; Option 1 Full Footprint in that disturbance would be reduced south of Melody Road west of SR-94. The centerline alignment for SR-94 under this Access Road Alignment would be shifted to the west through the intersection with Melody Road with the use of a reduced radius, and a broken-back[5] curve would be introduced between Melody Road and the proposed access driveway at Daisy Drive. The introduction of a reduced radius and broken-back horizontal curvature would help to facilitate the reduced disturbed area associated with this Access Road Alignment. The Daisy Drive Access Alignment; Option 2 Reduced Footprint also would incorporate a reduced rate of superelevation through the SR-94/Melody Road intersection and also along the proposed horizontal curve located just north of Daisy Drive. The reduced rate of superelevation would require a mandatory design exception for not meeting current Caltrans standards.

Proposed traffic signals and left-turn lanes are the same as stated for the Daisy Drive Access Alignment; Option 1 Full Footprint, with the exception that no exclusive left-turn lane is proposed on the departure from Peaceful Valley Ranch Road for the Daisy Drive Access Alignment; Option 2 Reduced Footprint.

Construction Schedule

See page 1-20 *Construction Schedule* for Alternative 1: Reservation Road Access.

Retaining Walls

Six retaining walls would be constructed as part of the Daisy Drive Access Alignment; Option 2 Reduced Footprint. Three retaining walls approximately 100 feet to 150 feet in length and approximately 6 feet tall would be required along the west side of SR-94 between Melody Road

[5] / A broken-back curve consists of two curves in the same direction joined by a short straight segment of road.

and Daisy Drive, to contain the improvement within the existing ROW. These walls are anticipated to be Caltrans standard Type 1 Walls. One retaining wall, approximately 400 feet in length and between 10 feet to 18 feet in height, would be constructed along the south side of Melody Road to avoid impacts to property south of Melody Road. This wall would be a Caltrans standard Type 1 wall.

Two retaining walls would be constructed along the east-side of SR-94 between the SR-94/Daisy Drive intersection and SR-94/Peaceful Valley Ranch Road intersection to accommodate the realignment and widening of SR-94. These walls would be within the IOD Land. These retaining walls would have a combined length of about 700 feet and would vary in height from approximately 8 feet to 12 feet, and would be Caltrans standard Type 1 walls or soil nail walls. The locations of the proposed retaining walls are identified on **Figure 1-11**.

Transit Stops

Two bus stops would also be installed: (1) east side of SR-94 immediately north of Daisy Drive, and (2) west side of SR-94 approximately 25 feet south of Daisy Drive. Bus stop details detailed for Alternative 1: Reservation Road Access applies to this Access Road Alignment. There are currently no bus stops at these locations. The locations of transit stops are identified on **Figure 1-11 (Sheet 3)**.

Biofiltration Swales/Drainage Improvements

See page 1-27 *Biofiltration Swales/Drainage Improvements* for Alternative 2: Daisy Drive Access; Option 1 Full Footprint.

Utilities

See page 1-27 *Utilities* for Alternative 2: Daisy Drive Access; Option 1 Full Footprint.

Construction Staging/Storage and Access Areas

Staging/storage areas would be located within the Proposed Project limits, as well as upon a four-acre parcel adjacent to SR-94 north of Reservation Road (Daisy Drive parcel). Staging/storage areas would be located at least 25 feet from occupied residences. The staging/storage areas would require lighting and would be fenced. Best Management Practices would be used at the staging/storage areas to meet stormwater quality requirements. Work in staging/storage areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.

Road Closures/Detours

See page 1-23 *Road Closures/Detours* for Alternative 1: Reservation Road Access.

Non-Standard Design Features

The Daisy Drive Access Alignment; Option 2 Reduced Footprint would require design exceptions to superelevation at the SR-94/Melody Road intersection. The superelevation is the roadway cross slope required when the roadway alignment is in a curve.

Easements and ROW Acquisition

Right of way acquisition, permanent easement and temporary easements would be required for the Daisy Drive Access Alignment; Option 2 Reduced Footprint. This Access Road Alignment would require ROW from 15 parcels totaling 5.54 acres. This Access Road Alignment results in no displacement of land owners. A total of 0.15 acres would need to be acquired from residential properties north of Peaceful Valley Ranch Road and Melody Road. Additionally, 0.33 acres would be needed from the 10-acre property northwest of the SR-94/Melody Road intersection, while 0.59 acres would be needed from the 87-acre property southwest of the SR-94/Melody Road intersection. A total of 1.1 acres would be needed from the CDFW property south of Reservation Road from as shown in **Figure 1-11**. The IOD Land impacts would be similar to Alternative 1: Reservation Road Access.

Permanent easements required for Daisy Drive Access Alignment; Option 2 Reduced Footprint would include utility easements, drainage easement and footing easements. A total of 0.08 acres would be required for utility easements. A total of 0.09 acres would be required for drainage easements. A total of 0.49 acres would be required for footing easement of proposed retaining walls.

Temporary easements would be needed to allow for space to construct the improvements. A total of 0.75 acres of temporary easements would be required for this Access Road Alignment. The ROW details for the Daisy Drive Access Alignment; Option 2 Reduced Footprint are provided in **Table 1-7**.

TABLE 1-7
PROPOSED ROW ACQUISITION:
ALTERNATIVE 2: DAISY DRIVE ACCESS;
OPTION 2 REDUCED FOOTPRINT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-041-2600	8.02	0.03	0.37%
597-041-4400	1.36	0.12	8.82%
597-041-4000	1.36	0.24	17.65%
597-060-0200	28.85	2.59	8.98%

TABLE 1-7 cont.
PROPOSED ROW ACQUISITION:
ALTERNATIVE 2: DAISY DRIVE ACCESS;
OPTION 2 REDUCED FOOTPRINT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-042-1300	10.34	0.34	3.29%
597-060-0400	4.35	0.52	11.95%
597-060-0500	86.03	0.60	0.70%
597-080-0400	4.66	0.03	0.64%
597-080-0500	1.54	0.03	1.95%
597-080-700	72.59	0.56	0.77%
597-080-800	68.16	0.41	0.60%
597-160-0400	79.91	0.07	0.09%
Total Estimated ROW Needed		5.54	

Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint

Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint includes both the construction of the Common Design Features (including the Non-Access Road Intersections) described in Section 1.4.1, as well as the Daisy Drive Access Alignment; Option 3 Minimum Footprint described below. Reference below is made to the "Daisy Drive Access Alignment: Option 3 Minimum Footprint" or "Access Road Alignment" given that the Access Road Alignment component of this alternative is detailed.

The Daisy Drive Access Alignment; Option 3 Minimum Footprint (**Figure 1-12**) would provide access to the JIV Gaming Development Project via Daisy Drive, the same as for the Daisy Drive Access Alignment; Options 1 and 2. The design of this Access Road Alignment, however, minimizes disturbed areas with the implementation of non-standard geometric elements requiring mandatory exceptions to Caltrans design standards. This Access Road Alignment would result in:

- Reduced design speed from 55 mph to 45 mph,
- Reduced horizontal curvature,
- Reduced shoulder width,

- Reduced stopping sight distance along vertical curvature,
- Increased maximum grade, and
- Reduced superelevation rate.

Although the proposed geometric elements for this Access Road Alignment include non-standard design features, the realignment would be an improvement from existing conditions.

Proposed Project features would begin approximately 800 feet north of Melody Road and continue to about 400 feet south of Reservation Road, for a total length of approximately 0.6 miles. Proposed traffic signals and exclusive left turn lanes are the same as those proposed as a part of the Daisy Drive Access Alignment; Option 1 and Option 2. The proposed profile for SR-94 through the SR-94/Melody Road intersection would be kept close to existing grade to minimize roadway excavation and minimize impact to right-of-way; therefore, the proposed profiles for Melody Road and Peaceful Valley Ranch Road would also remain close to existing grade. The lane widths for this Access Road Alignment would be reduced along Melody Road in order to accommodate the roadway widening while minimizing environmental disturbance. Unlike the Daisy Drive Access Alignment; Option 2 Reduced Footprint, which realigned Melody Road to the north, the Daisy Drive Access Alignment; Option 3 Minimum Footprint retains the existing southern edge of traveled way and widens Melody Road to the north. Maintaining the existing profile grade and widening only to the north along Melody Road reduces overall environmental disturbance.

Construction Schedule

See page 1-20 *Construction Schedule* for Alternative 1: Reservation Road Access.

Retaining Walls

Six retaining walls would be constructed as part of the Daisy Drive Access Alignment; Option 3 Minimum Footprint. One retaining wall would be located along the west side of SR-94, about 200 feet north of Melody Road, and would be about 100 feet in length and 4 feet in height. This wall would be a Caltrans standard Type 1 Wall. Three retaining walls would be constructed on both sides of Melody Road to minimize impact to the properties north and south of Melody Road. These walls would be approximately 1,100 feet in combined length and approximately 10 to 15 feet in height. These walls would be Caltrans standard Type 1 Walls. Two retaining walls would be located along the east side of SR-94 between Peaceful Valley Ranch Road and the existing Reservation Road to accommodate the realignment and widening of SR-94. These retaining walls would be approximately 1,000 feet in length combined, and would vary in height from about 10 feet to 20 feet. These walls would be Caltrans standard Type 1 Walls or soil nail

walls. These walls would be located within the IOD Land. The locations of the proposed retaining walls are identified on **Figure 1-12**.

Transit Stops

Two bus stops would also be installed: (1) east side of SR-94 immediately north of Daisy Drive, and (2) west side of SR-94 approximately 25 feet south of Daisy Drive. Bus stop details provided for the Reservation Road Access Alignment applies to this Access Road Alignment. The locations of transit stops are identified on **Figure 1-12**.

Biofiltration Swales/Drainage Improvements

Three bioswales would be constructed within the Caltrans ROW for stormwater treatment. One bioswale would be constructed north of Melody Road, while two bioswales would be constructed south of Melody Road. The bioswale located to the north of Melody Road along SR-94 would be 5 feet wide and 150 feet long. The bioswales located to the north and south of Melody Road along Melody Road would be 5 feet wide and 60 feet long. The bioswales along SR-94 south of Melody Road would both be 6 feet wide and 105 feet long. The bioswales would be designed as described for the SR-94/Jamacha Road intersection. The locations of the proposed bioswales are identified on **Figure 1-12**.

Other drainage improvements would be the same as described for the Reservation Road Access Alignment.

Utilities

See page 1-23 *Utilities* for Alternative 1: Reservation Road Access.

Construction Staging/Storage and Access Areas

See page 1-23 *Construction Staging/Storage and Access Areas* for Alternative 1: Reservation Road Access.

Road Closures/Detours

See page 1-23 *Road Closures/Detours* for Alternative 1: Reservation Road Access.

Non-Standard Design Features

The Daisy Drive Access Alignment; Option 3 Minimum Footprint was developed to avoid impact to environmental resources. Because of this, several design exceptions to Caltrans current standards would be required. To avoid impacts to environmental resources, the Access Road Alignment would require reduction of the design speed of SR-94 from 55 mph to 45 mph.

A lower design speed would maintain Caltrans standards for curve radius and superelevation. Shoulder width would also be reduced by 2 feet. To minimize roadway excavations, steeper grades along SR-94 would be required. Design exceptions to stopping sight distance and superelevation rates would also be required for this Access Road Alignment.

Easements and ROW Acquisition

Right of way acquisition, permanent easement and temporary easements would be required for the Daisy Drive Access Alignment; Option 3 Minimum Footprint. This Access Road Alignment would require ROW from eight parcels totaling 2.82 acres. This Access Road Alignment results in no displacement of land owners. No partial takes would need to be acquired from residential properties north of Peaceful Valley Ranch Road and Melody Road. A total of 0.06 acres would be needed from the 10-acre property northwest of the SR-94/Melody Road intersection, while 0.04 acres would be needed from the 87-acre property southwest of the SR-94/Melody Road intersection. A total of 0.08 acres would be acquired from CDFW property south of Reservation Road from as shown in **Figure 1-12**. Lastly, the IOD ROW impacts would be similar to the Reservation Road Access Alignment.

Permanent easements required for the Daisy Drive Access Alignment; Option 3 Minimum Footprint would include utility easements, drainage easement and footing easements. A total of 0.05 acres would be required for utility easements. A total of 0.38 acres would be required for drainage easements. A total of 1.1 acres would be required for footing easement of proposed retaining walls.

Temporary easements would be needed to allow for space to construct the improvements. A total of 0.5 acres of temporary easements would be required for this Access Road Alignment. The ROW details for the Daisy Drive Access Alignment; Option 3 Minimum Footprint are provided in **Table 1-8**.

TABLE 1-8
PROPOSED ROW ACQUISITION:
ALTERNATIVE 2: DAISY DRIVE ACCESS; OPTION 3 MINIMUM FOOTPRINT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-041-4000	1.36	0.24	17.65%
597-060-0200	28.85	2.40	8.32%
597-042-1300	10.34	0.06	0.58%
597-060-0500	86.03	0.04	0.05%
597-080-0400	4.66	0.002	0.04%

TABLE 1-8 cont.
PROPOSED ROW ACQUISITION:
ALTERNATIVE 2: DAISY DRIVE ACCESS; OPTION 3 MINIMUM FOOTPRINT

597-080-0500	1.54	0.0007	0.05%
597-080-700	72.59	0.03	0.04%
597-080-800	68.16	0.05	0.07%
Total Estimated ROW Needed		2.82	

1.4.4 Alternative 3: Melody Road Access

Alternative 3: Melody Road Access (**Figure 1-13**) would provide primary access to the JIV Tribal Lands via a proposed new access driveway from Melody Road. This alternative includes improvements to SR-94, SR-94/Melody Road intersection, and a new access drive from Melody Road (west of the intersection) to the Tribal Lands. This alternative includes both the construction of the Common Design Features (including the Non-Access Road Intersections) described in Section 1.4.1, as well as the Melody Road Access Alignment described below. Reference below is made to the "Melody Road Access Alignment" or "Access Road Alignment" given that the Access Road Alignment component of this alternative is detailed.

The new Access Road Alignment would allow access to the JIV Gaming Facility over an 87-acre parcel to the north of the JIV Tribal Land. No new driveway intersection is proposed at either Reservation Road or Daisy Drive with this Access Road Alignment. A wider footprint would be necessary at the SR-94/Melody Road-Peaceful Valley Ranch Road intersection in order to accommodate the necessary intersection improvements proposed as a part of this Access Road Alignment. In contrast to the other Access Road Alignments, the Melody Road Access Alignment would require an additional northbound through lane north of Melody Road to accommodate a second exclusive left turn lane proposed from Melody Road. A second exclusive left turn lane would also be required for the north to west move from SR-94 to Melody Road. A second through lane is also needed for westbound Melody Road leading to the proposed access driveway.

This Access Road Alignment would improve SR-94 from about 1,300 feet north of Melody Road to about 900 feet south of Reservation Road, for a total length of approximately 0.85 miles of SR-94. As part of this improvement, two new traffic signals would be installed, one at the SR-94/Melody Road intersection and the second signal at the proposed new entrance road from Melody Road to the 87-acre parcel. The signals would be equipped with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). At the new Melody Road intersection, an exclusive 12-foot-wide southbound lane would be added with a length of approximate 400 feet. The existing SR-94 southbound left-turn lane approaching

Peaceful Valley Ranch Road would be extended by 225 feet to provide a total combination of deceleration and storage length of 375 feet.

Along Melody Road, two new 12-foot westbound lanes would be added, in addition to 12-foot dual eastbound lanes and an eastbound 12-foot shared through-right turn lane. The dual left-turn lanes from eastbound Melody Road to northbound SR-94 would have a combined deceleration and storage length of approximately 700 feet. Along Peaceful Valley Ranch Road, a 12-foot westbound left-turn lane would be added with a total deceleration and storage length of approximately 150 feet. Dual 12-foot northbound left-turn lanes would be added with a combined deceleration and storage length of 1,000 feet.

At the new intersection for the Melody Road Access Alignment, dual 12-foot westbound left-turn lanes would be added with a combined deceleration and storage length of 700 feet. At approximately 200 feet west of the new signalized entrance, Melody Road would be widened to provide a second eastbound lane that would continue east until the intersection with SR-94.

Construction Schedule

See page 1-20 *Construction Schedule* for Alternative 1: Reservation Road Access.

Retaining Walls

Eleven retaining walls would be constructed as part of the Melody Road Access Alignment. Two retaining walls would be constructed along SR-94 approximately 500 feet in combined length and 8 to 10 feet in height along the east-side of the highway between Peaceful Valley Ranch Road and Daisy Drive. These walls would be Caltrans standard Type 1 walls or soil nail walls. One retaining wall approximately 350 feet in length and approximately 6 feet tall would be required along the west side of SR-94 between Melody Road and Daisy Drive, to minimize impacts to ROW. One retaining wall approximately 150 feet in length and varying in height from 6 feet to 12 feet would be required along the south side of Melody Road adjacent to the intersection with SR-94. Within the 87-acre parcel south of Melody Road, seven retaining walls of up to 40 feet in height and combined length of approximately 4,000 feet would be constructed to accommodate the access driveway to the JIV Tribal Lands. These walls are anticipated to be Caltrans standard Type 1 Walls. The locations of the proposed retaining walls are identified on **Figure 1-13**.

Transit Stops

One new bus stop would be installed near the access at Melody Road. There are currently no bus stops at this location. The locations of the transit stops are shown on **Figure 1-13**.

Biofiltration Swales/Drainage Improvements

Six bioswales would be constructed within the Caltrans and San Diego County ROW for stormwater treatment. Three of the bioswales would be constructed within the Caltrans ROW (one north of Melody Road and two south of Melody Road) and three within the San Diego County ROW (Peaceful Valley Ranch Road and Melody Road). The bioswale located to the north of Melody Road along SR-94 would be 5 feet wide and 150 feet long. The bioswales located to the north and south of Melody Road along Melody Road would be 5 feet wide and 60 feet long. The bioswales along SR-94 south of Melody Road would both be 6 feet wide and 105 feet long. The locations of the proposed bioswales are identified on **Figure 1-13**.

The other drainage improvements would be the same as described for the Reservation Road Access Alignment with the addition of roadside ditches to drain the access driveway from Melody Roadway.

Utilities

See page 1-23 *Utilities* Alternative 1: Reservation Road Access.

Construction Staging/Storage and Access Areas

See page 1-23 *Construction Staging/Storage and Access Areas* for Alternative 1: Reservation Road Access.

Road Closures/Detours

No prolonged closures are expected for SR-94. The existing number of lanes on SR-94 would be maintained during construction. Short term lane closures would be conducted to move barriers, re-stripe roadway, move heavy equipment, etc. These temporary lane closures would be completed following traffic control standards.

During reconstruction of Melody Road, an alternative route would be required for closure of Melody Road at the intersection with SR-94. Proctor Valley Road would be utilized to detour traffic that currently uses the SR-94/Melody Road intersection. Detour signs and construction area signs would be provided to direct traffic during the closure of Melody Road. The duration of the closure for Melody Road is estimated to be 6 months.

Non-Standard Design Features

The Melody Road Access Alignment would not require Caltrans design exceptions.

Easements and ROW Acquisition

Right-of-way (ROW) acquisition, permanent easement and temporary easements would be required for the Melody Road Access Alignment. This Access Road Alignment would require partial ROW from 15 parcels totaling 11.10 acres. This Access Road Alignment results in no displacement of land owners. A total of 0.48 acres would be needed from residential properties north of Peaceful Valley Ranch Road and Melody Road. A total of 0.68 acres would be needed from the 10-acre property located at the northwest corner of the SR-94/Melody Road intersection, while 4.5 acres would be needed from the 87-acre property located at the southwest corner of the SR-94/Melody Road intersection to accommodate the access driveway from Melody Road. A total of 0.84 acres would be needed from CDFW property south of Reservation Road from as shown in **Figure 1-13**. Lastly, IOD ROW impacts would be the same as stated for the Reservation Road Access Alignment.

Permanent easements required for the Reservation Road Access Alignment would include utility easements, drainage easement and footing easements. A total of 0.07 acres would be required for utility easements. A total of 0.08 acres would be required for drainage easements. A total of 1.7 acres would be required for footing easement of proposed retaining walls.

Temporary easements would be needed to allow for space to construct the improvements. A total of 0.62 acres of temporary easements would be required for this Access Road Alignment. The ROW details for the Melody Road Access Alignment are provided in **Table 1-9**.

TABLE 1-9
PROPOSED ROW ACQUISITION:
ALTERNATIVE 3: MELODY ROAD ACCESS ALIGNMENT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-041-2500	3.61	0.002	0.06%
597-041-2600	8.02	0.05	0.62%
597-041-4400	1.36	0.15	11.03%
597-041-4000	1.36	0.24	17.65%
597-041-5800	1.82	0.14	7.69%
597-041-1500	5.62	0.13	2.31%
597-060-0200	28.85	2.87	9.95%
597-042-1300	10.34	0.68	6.58%
597-060-0500	86.03	4.49	5.22%
597-060-0400	4.35	1.26	28.97%
597-080-0400	4.66	0.11	2.36%
597-080-0500	1.54	0.10	6.49%

TABLE 1-9 cont.
PROPOSED ROW ACQUISITION:
ALTERNATIVE 3: MELODY ROAD ACCESS ALIGNMENT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-080-800	68.16	0.46	0.67%
597-080-700	72.59	0.37	0.51%
597-280-6700	0.990	0.05	5.05%
Total Estimated ROW		11.10	

1.4.5 Alternative 4: No Project Alternative

No intersection or access road improvements would be implemented under Alternative 4: No Project Alternative. With the construction and operation of the JIV Gaming Development Project, the direct traffic impacts of the Gaming Development Project would not be mitigated[6]. The existing Reservation Road would serve as the access point to and from the JIV Tribal Lands onto and off of SR-94. The effect of this would be unacceptable LOS and operations (geometric design) between Melody Road and Reservation Road. In addition to the SR-94/Melody Road intersection, the various intersections identified under Section 1.4.1 Common Design Features of Alternatives 1-3: Build Alternatives would be impacted by the increased traffic from the JIV Gaming Development Project.

Even though Alternative 4: No Project Alternative would not entail any construction activities, the consequences of implementing this alternative would be non-standard road geometrics and increased traffic congestion/flow at five intersections along SR-94.

1.5 COMPARISON OF ALTERNATIVES

Table 1-10 below provides a comparison of the Build Alternatives:

TABLE 1-10
COMPARISON OF ALTERNATIVES 1-3: BUILD ALTERNATIVES

Features	Alternative 1: Reservation Road Access	Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint	Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint	Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint	Alternative 3: Melody Road Access Alignment
Total Impact Area	6.96	7.93	6.38	4.77	12.88
Estimated Construction Costs	$9,100,000 to $12,500,000	$8,200,000 to $11,300,000	$7,800,000 to $10,700,000	$8,600,000 to $11,800,000	$12,500,000 to $17,200,000

[6] / Please see Office of the Governor letter in **Appendix C**.

TABLE 1-10 cont.
COMPARISON OF ALTERNATIVES 1-3: BUILD ALTERNATIVES

Features	Alternative 1: Reservation Road Access	Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint	Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint	Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint	Alternative 3: Melody Road Access Alignment
Estimated Support Costs	$3,125,000	$2,825,000	$2,675,000	$2,950,000	$4,300,000
Environmental Issues	See Table S-1	See Table S-1	See Table S-1	See Table S-1	See Table S-1

After the Draft EIR public circulation period, all comments were considered, and Caltrans identified a preferred alternative and made the final determination of the Proposed Project's effect on the environment. In accordance with CEQA, Caltrans will certify that the EIR complies with CEQA, prepare findings for all significant impacts identified, prepare a Statement of Overriding Considerations for any impacts that would not be mitigated below a level of significance, and certify that the findings and Statement of Overriding Considerations have been considered prior to Proposed Project approval. Caltrans may then take action to approve the Proposed Project. If it does so, Caltrans would then file a Notice of Determination with the State Clearinghouse that would identify whether the Proposed Project will have significant impacts, if mitigation measures are included as conditions of Proposed Project approval, that findings were made, and that a Statement of Overriding Considerations was adopted.

1.6 IDENTIFICATION OF THE PREFERRED ALTERNATIVE

Caltrans has identified Alternative 2: Daisy Drive Access; Option 1 Full Footprint as the preferred alternative. To determine the preferred alternative, a Project Development Team "Alternative Selection Task Group" of 17 Caltrans staff was convened. The Task Group chose to use specific criteria within a value metric evaluation process.

The specific criteria chosen were:

- Traffic Operations
- Roadway Geometrics
- Right-of-Way Impacts
- Environmental Impacts
- Constructability

The criteria chosen were based on the performance requirements or desired attributes of the project with respect to the Purpose and Need and the specific project objectives to:

- Provide appropriate access to and from SR-94 and the approved JIV Gaming Development,
- Lessen direct traffic impacts caused by the JIV gaming facility on SR-94,
- Improve the geometric design of the main access between SR-94 and the gaming facility, and
- Improve the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road in a manner consistent with the SR-94 Transportation Concept Summary (TCS) and the 2050 Regional Transportation Plan (RTP).

The individual Task Group participants then ranked the criteria according to importance with respect to the Purpose and Need. The criteria were then weighted based on the sum of the Task Group rankings. The Task Group members individually assigned a performance rating or score value between 1 (worst) and 10 (best) to each alternative with respect to each criteria. Those rates were then multiplied by the criteria weight to arrive at an overall performance value of each alternative with respect to the criteria. Alternative 2: Daisy Drive Access; Option 1 Full Footprint was the highest ranked alternative overall. This alternative was also ranked highest in the key criteria of Traffic Operations (safety) and Roadway Geometrics, and requires one design exception for the SR-94/Lyons Valley Road intersection.

1.7 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER DISCUSSION PRIOR TO DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

CEQA Guidelines Section 15126.6(c) states that the "EIR should…identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." This section of the Guidelines goes on to state "among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: i) failure to meet most of the basic Proposed Project objectives, ii) infeasibility, or iii) inability to avoid significant environmental impacts."

The three Access Road Alignments addressed in this Final EIR were an outgrowth of the Jamul Final Tribal EE undertaken by the JIV for its Gaming Development Project. The 2013 Final Tribal EE identified three access locations, which addressed LOS and safety issues resulting from future gaming related traffic. In addition, five other intersection improvements were identified as mitigation for traffic increases resulting from the JIV Gaming Development Project[7]. The identified improvements at these locations addressed capacity deficiencies at these

[7] / Other intersection improvements were identified in the 2013 Final Tribal EE; however, the JIV is responsible for making a good-faith effort to mitigate 100% of the impact from the five addressed in this SR-94 Improvement Project Final EIR (aside from the access road). Per the 2013 Final Tribal EE, the JIV is responsible for a fair-share contribution for the impacted intersections that are not addressed in this Final EIR.

existing intersection facilities. The access locations addressed in this Final EIR were determined to be the best suited locations given site constraints and Caltrans design standards.

No other access locations have been considered and/or rejected during the EIR scoping process. Variations on the improvements at these locations were considered over time; however, these did not include an alternative access location different than currently considered.

1.8 PERMITS AND APPROVALS

The permits, reviews and approvals that may be required for Proposed Project construction are listed in **Table 1-11**.

TABLE 1-11
PERMITS AND APPROVALS

Agency	Permit/Approval	Status
USACE	Clean Water Act Section 404 Nationwide Permit	Approved September 29, 2015
USFWS	Endangered Species Act Section 7 Consultation with USACE before issuance of Nationwide Permit	Pending
	Review/approval of a MSCP Amendment or Boundary Line Adjustment	Pending
SWRCB/RWQCB	Enrollment in the program for a NPDES General Permit for Storm water discharges associated with construction activity,	Pending
	Water quality certification under Section 401 of the Clean Water Act (CWA) in conjunction with USACE issuance of a Nationwide permit	Pending
CDFW	Review/approval of a MSCP Amendment or Boundary Line Adjustment	Pending
	Consultation with CDFW and Issuance of a SAA under Fish and Game Code Section 1600 et seq.	Pending
	CDFW approval of land conveyance to be used for access road ROW	Pending
	Review of MSCP and Biological Mitigation Ordinance mitigation implementation for those portions of the Proposed Project that conform to the MSCP land designations Approval of a MSCP Amendment or Boundary Line Adjustment for those portions of the Proposed Project that do not conform to the MSCP land designations	Pending
San Diego County	County grading permits for work undertaken within San Diego County jurisdiction	Pending
	Prior to any grading activities for Alternative 3, the Proposed Project would need approval from San Diego County for an amendment to the Otay Mesa Specific Plan allowing for the reconfiguration of parcels to accommodate the Alternative 3 alignment	Pending
	Prior to any grading activities for Alternative 3, the Proposed Project would need approval from San Diego County for an	Pending

TABLE 1-11 cont.
PERMITS AND APPROVALS

Agency	Permit/Approval	Status
	exemption to Mobility Goal #, Policy #15 of the Jamul/Dulzura Sub regional Plan allowing for the connection of a commercial facility to Melody Road, which is a collective street	
	Prior to any grading activities for Alternative 3, the Proposed Project would need approval from San Diego County for an amendment to the MSCP allowing for the proposed roadway	Pending
	Irrevocable Offer of Dedication for Caltrans Highway Purposes would be executed for roadway improvements	Approved pending execution

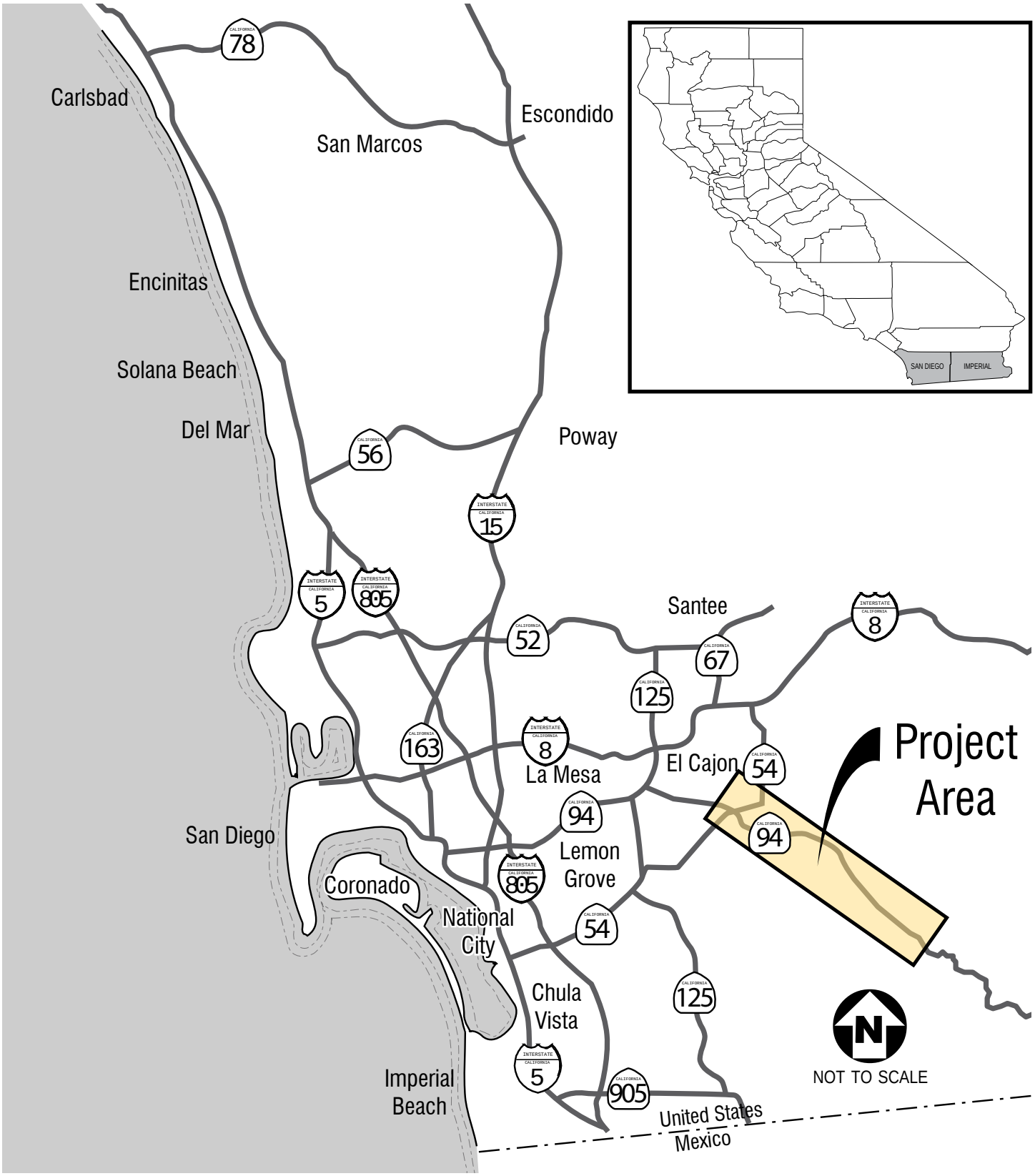


Figure 1-1
Regional Location Map

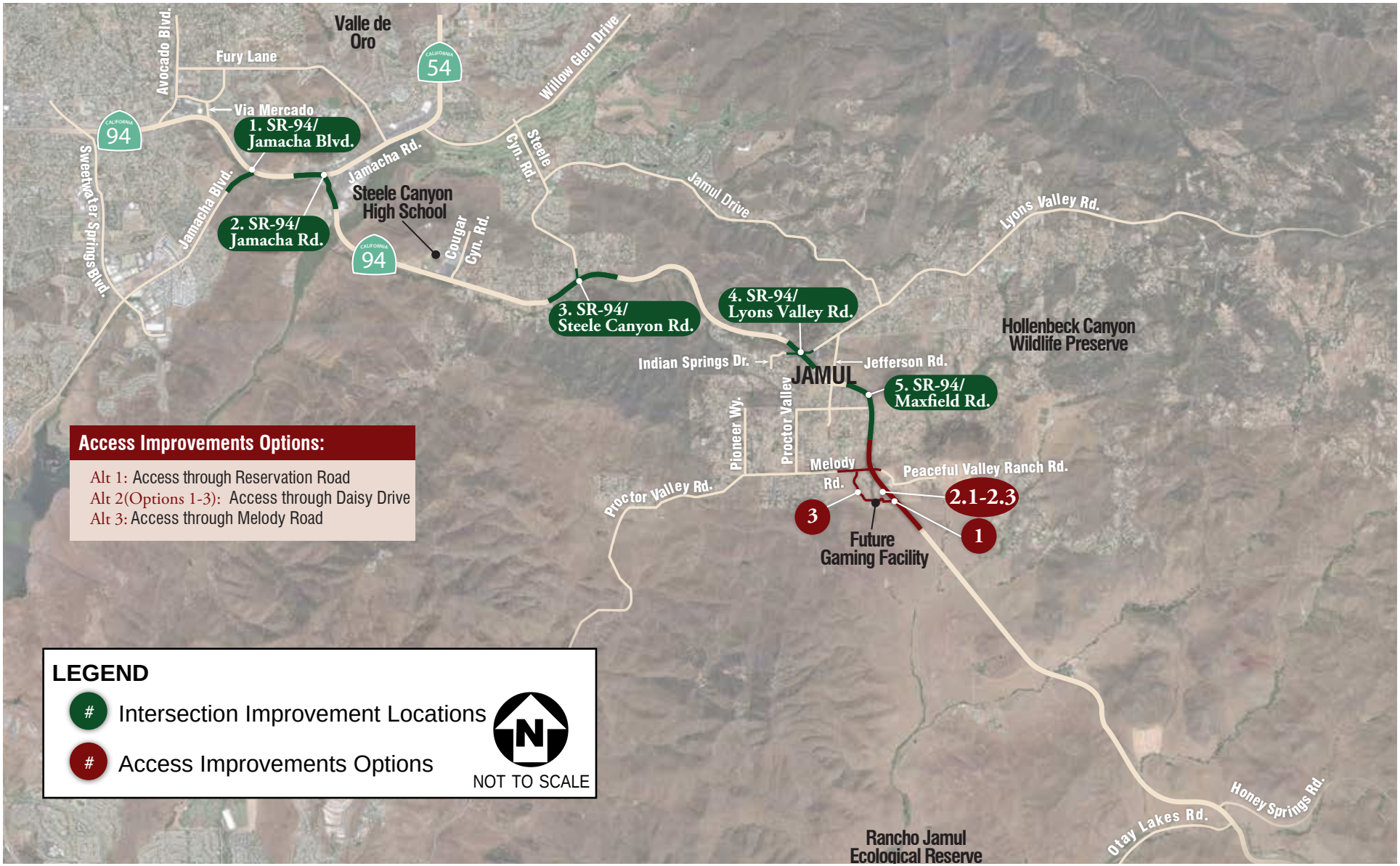
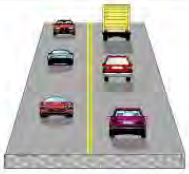


Figure 1-2
Project Vicinity Map

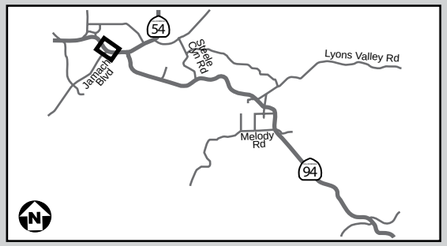
LEVELS OF SERVICE

for Two-Lane Highways

Level of Service	Flow Conditions	Operating Speed (mph)	Technical Descriptions
A		55+	Highest quality of service. Free traffic flow with few restrictions on maneuverability or speed. **No delays**
B		50	Stable traffic flow. Speed becoming slightly restricted. Low restriction on maneuverability. **No delays**
C		45	Stable traffic flow, but less freedom to select speed, change lanes or pass. **Minimal delays**
D		40	Traffic flow becoming unstable. Speeds subject to sudden change. Passing is difficult. **Minimal delays**
E		35	Unstable traffic flow. Speeds change quickly and maneuverability is low. **Significant delays**
F			Heavily congested traffic. Demand exceeds capacity and speeds vary greatly. **Considerable delays**

Source: 2000 HCM, Exhibit 20-2, LOS Criteria for Two-Lane Highways in Class 1

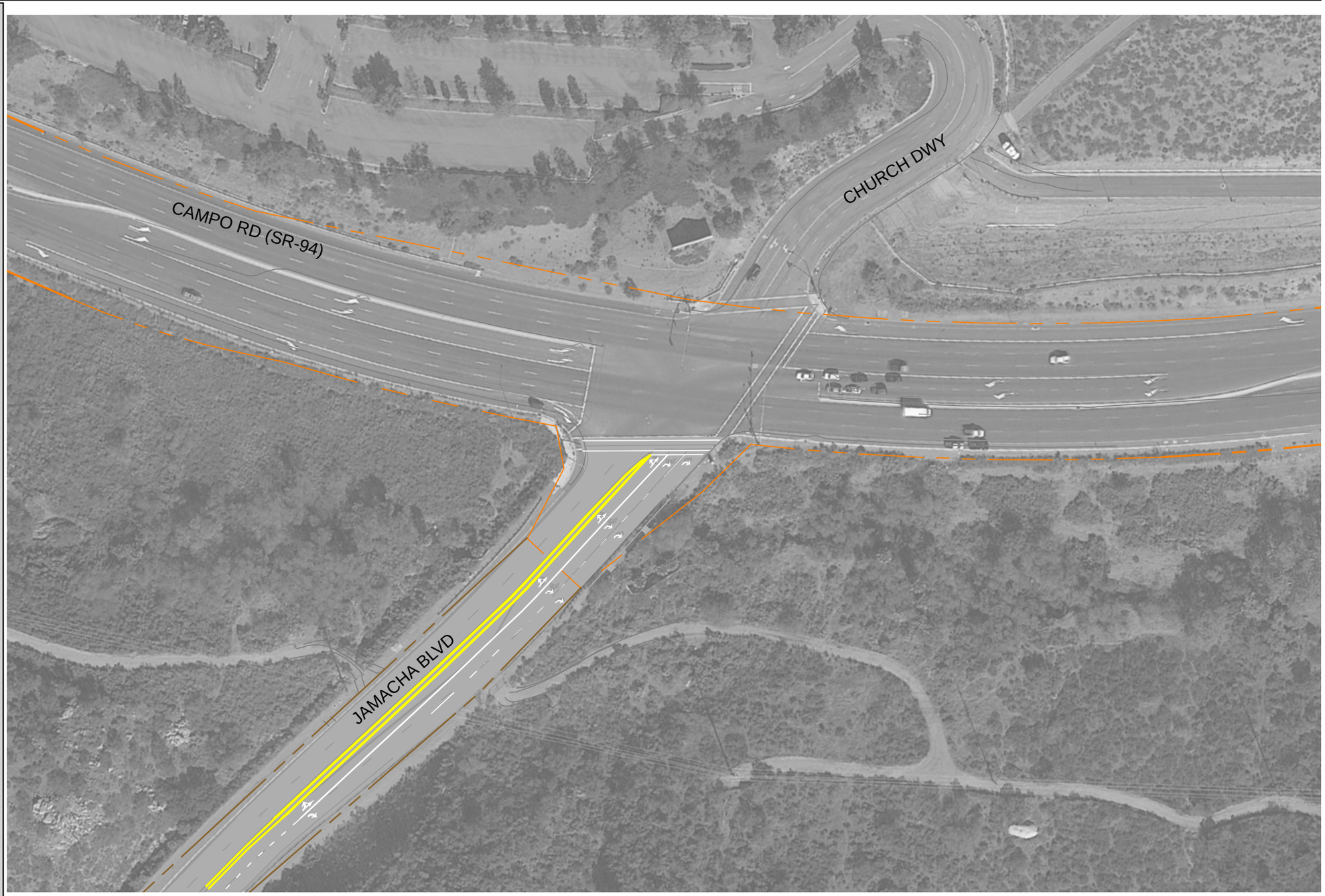
Figure 1-3
Levels of Service for Two-Lane Highways



Existing Caltrans ROW

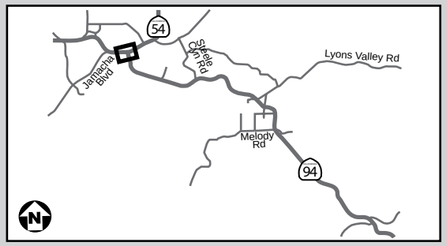
Existing County ROW

Proposed Restriping



200 100 0 200

Figure 1-4
SR-94/Jamacha Blvd. Intersection Improvements



LEGEND

- Proposed Storm Drain Extension or Replacement
- Proposed Outside Lane Widening
- Proposed Outside Mainline Shoulder Widening
- Proposed Retaining Wall
- Proposed Guardrail
- Proposed Grading Limit (cut)
- Proposed Grading Limit (fill)
- Existing Caltrans ROW
- Proposed Caltrans ROW
- Proposed Bioswale
- Proposed Acquisition Area
- Proposed Temporary Easement
- Proposed Restriping
- Proposed Reconstructed/New Pavement Area
- Proposed ADA Pad at Pedestrian Crossings

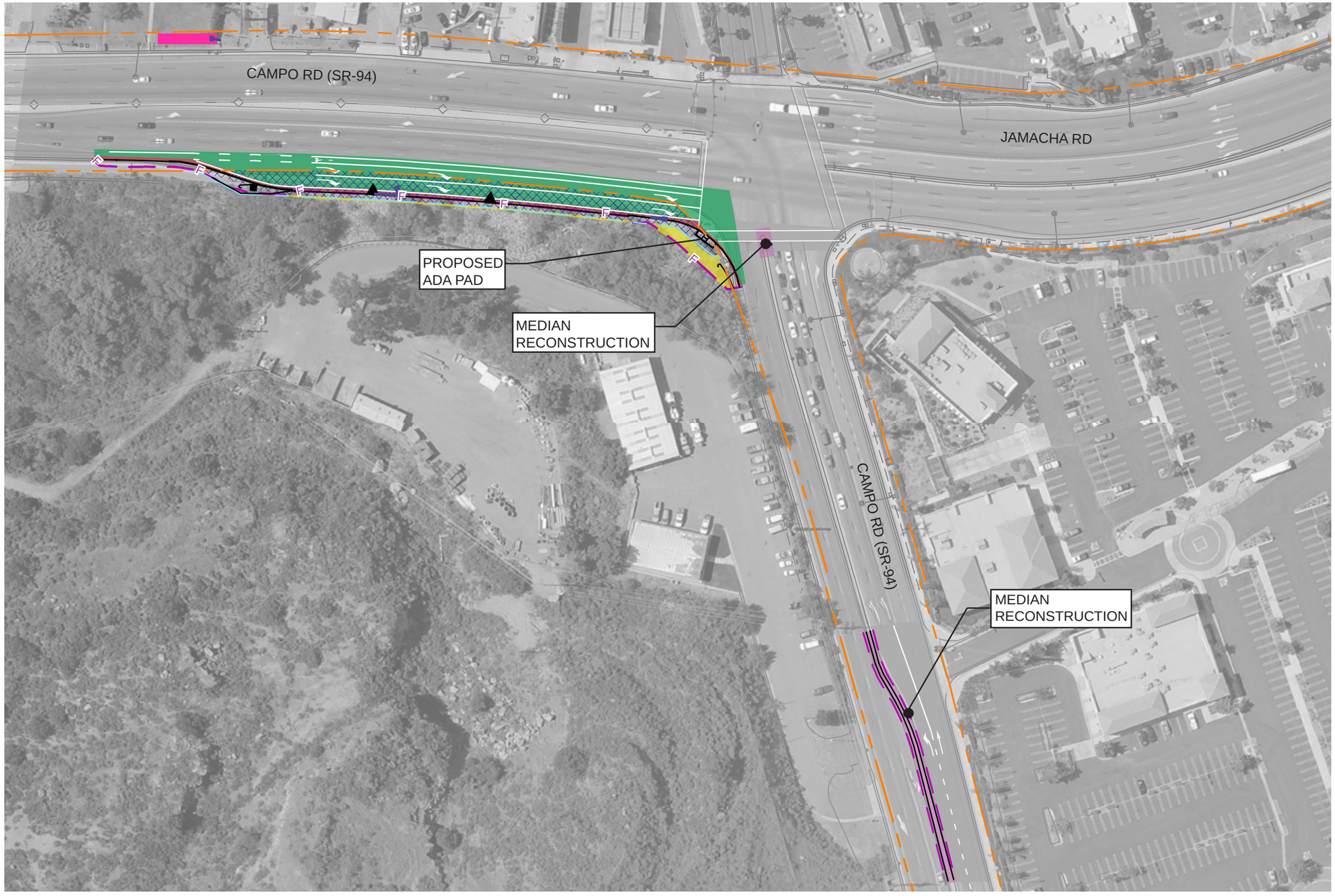
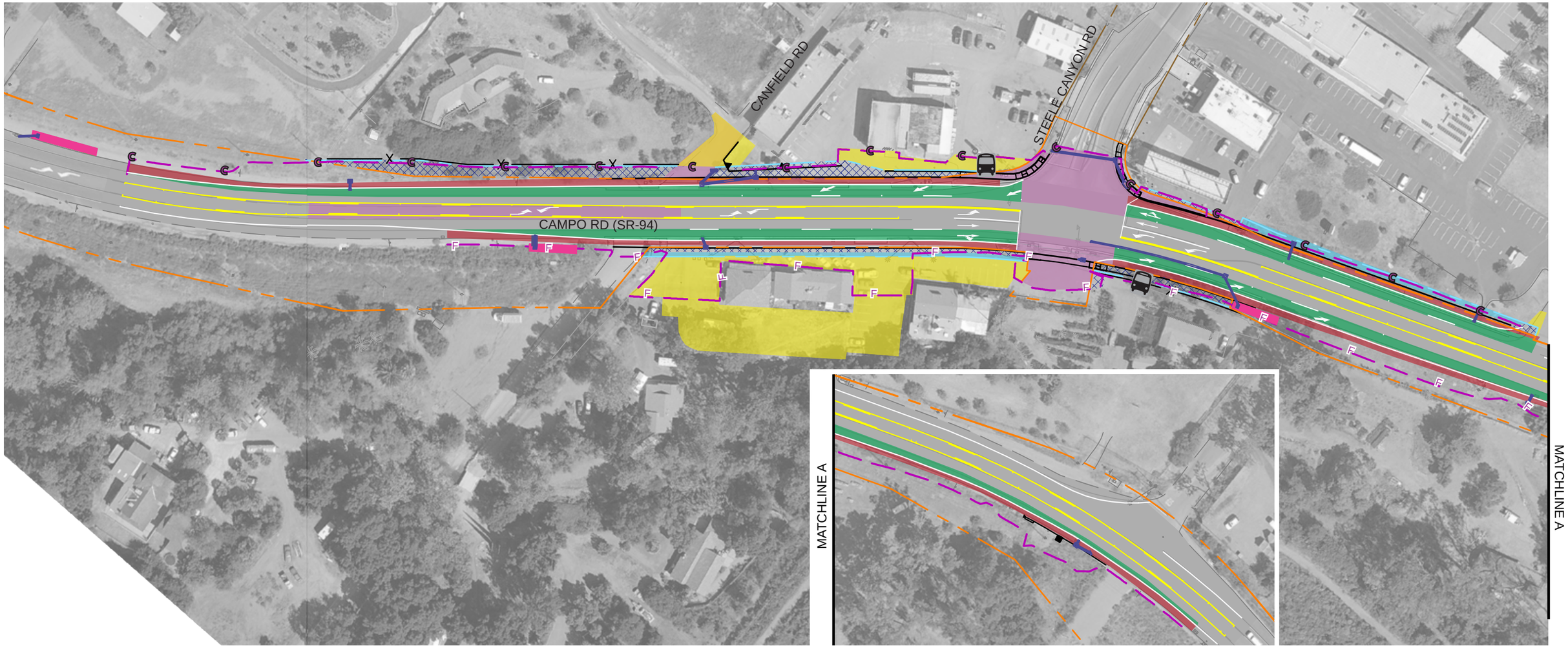
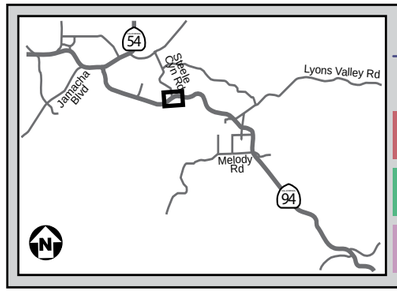


Figure 1-5
SR-94/Jamacha Road Intersection Improvements





LEGEND

- Proposed Storm Drain Extension or Replacement
- Proposed Outside Mainline Shoulder Widening
- Proposed Outside Lane Widening
- Proposed Reconstructed/New Pavement Area
- Proposed Guardrail
- Proposed Retaining Wall
- Existing Caltrans ROW
- Existing County ROW
- Proposed Caltrans ROW
- Proposed Grading Limit (cut)
- Proposed Grading Limit (fill)
- Proposed Acquisition Area
- Proposed Temporary Easement
- Proposed Permanent Easement
- Proposed Bioswale
- Proposed Restriping
- New or Existing Bus Stop to be Upgraded
- Relocated Existing Fence
- Proposed ADA Pads at Pedestrian Crossings

200 100 0 200

Figure 1-6
SR-94/Steele Canyon Road Intersection Improvements

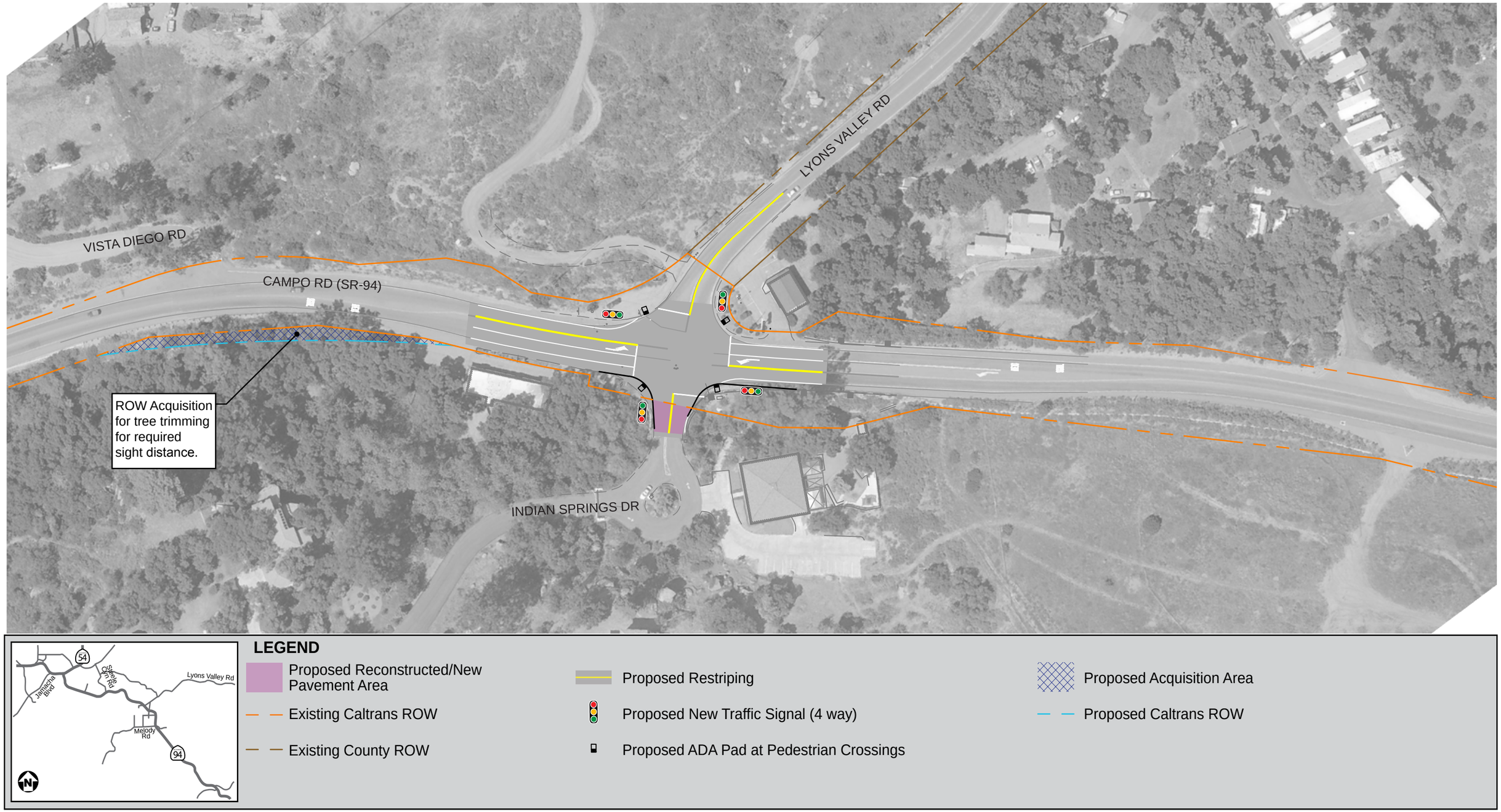


Figure 1-7
SR-94/Lyons Valley Road Intersection Improvements

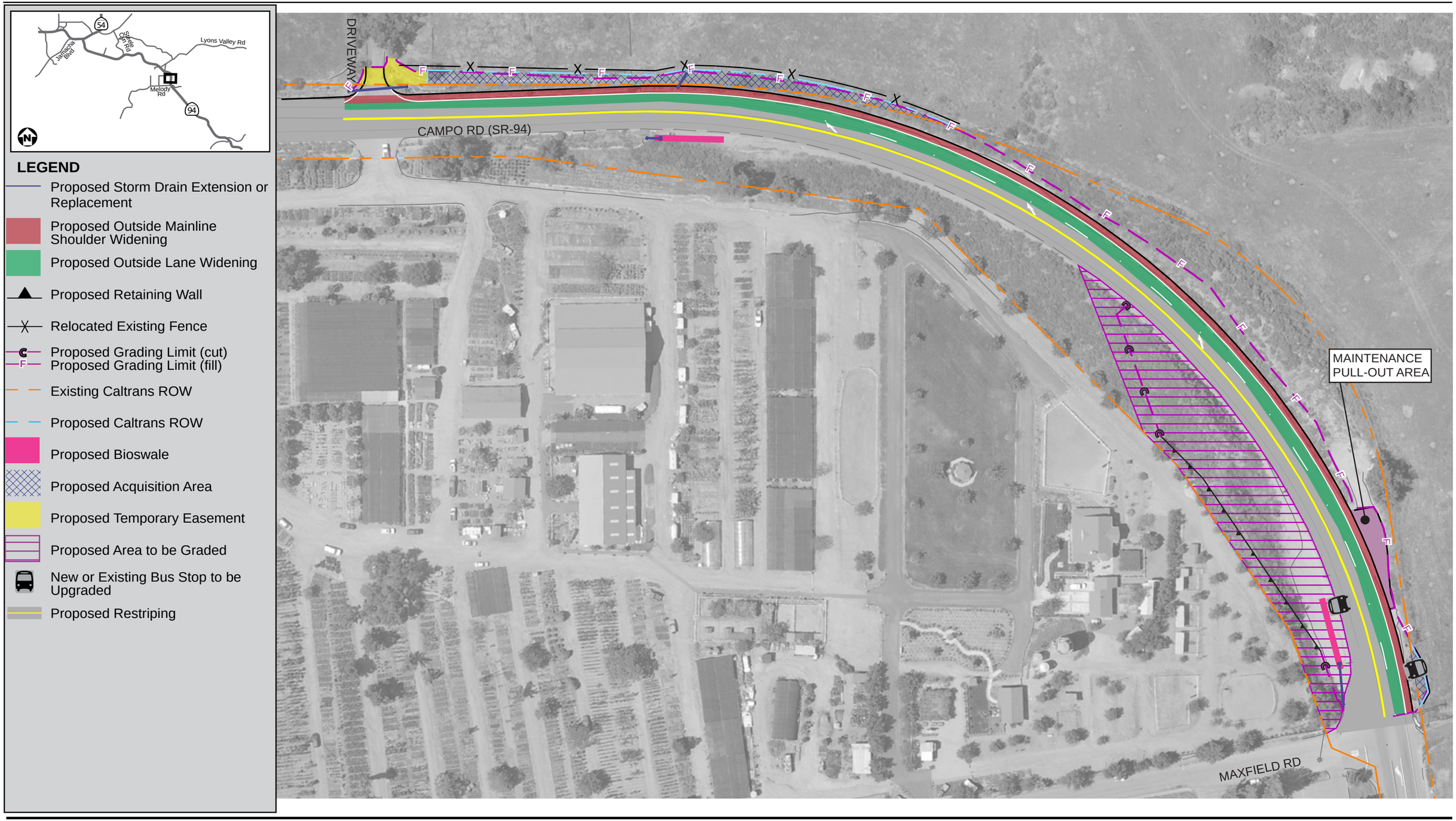


Figure 1-8
SR-94/Maxfield Road Intersection Improvements

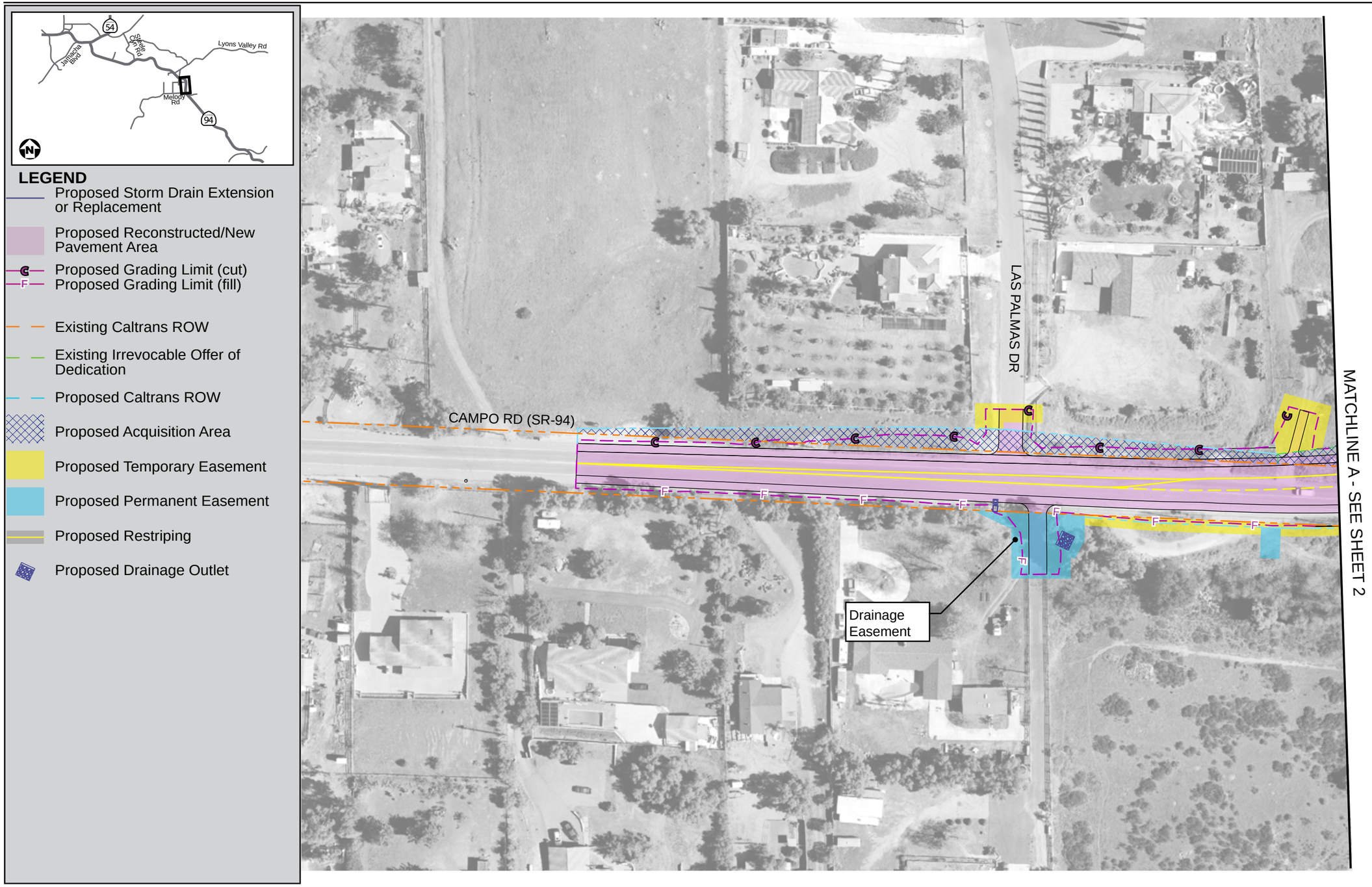


Figure 1-9
Reservation Road Access Alignment (Sheet 1-4)

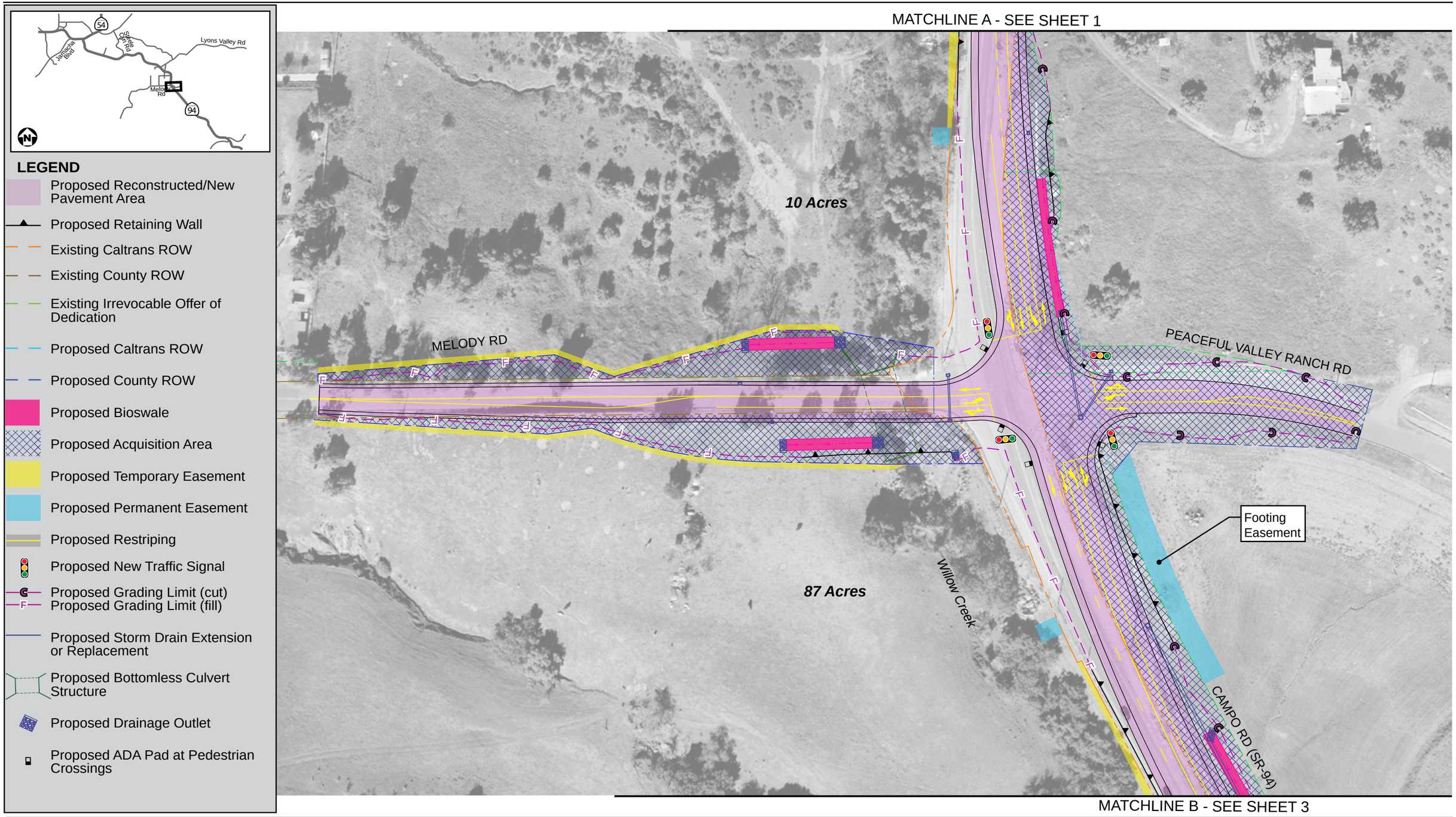


Figure 1-9
Reservation Road Access Alignment (Sheet 2-4)

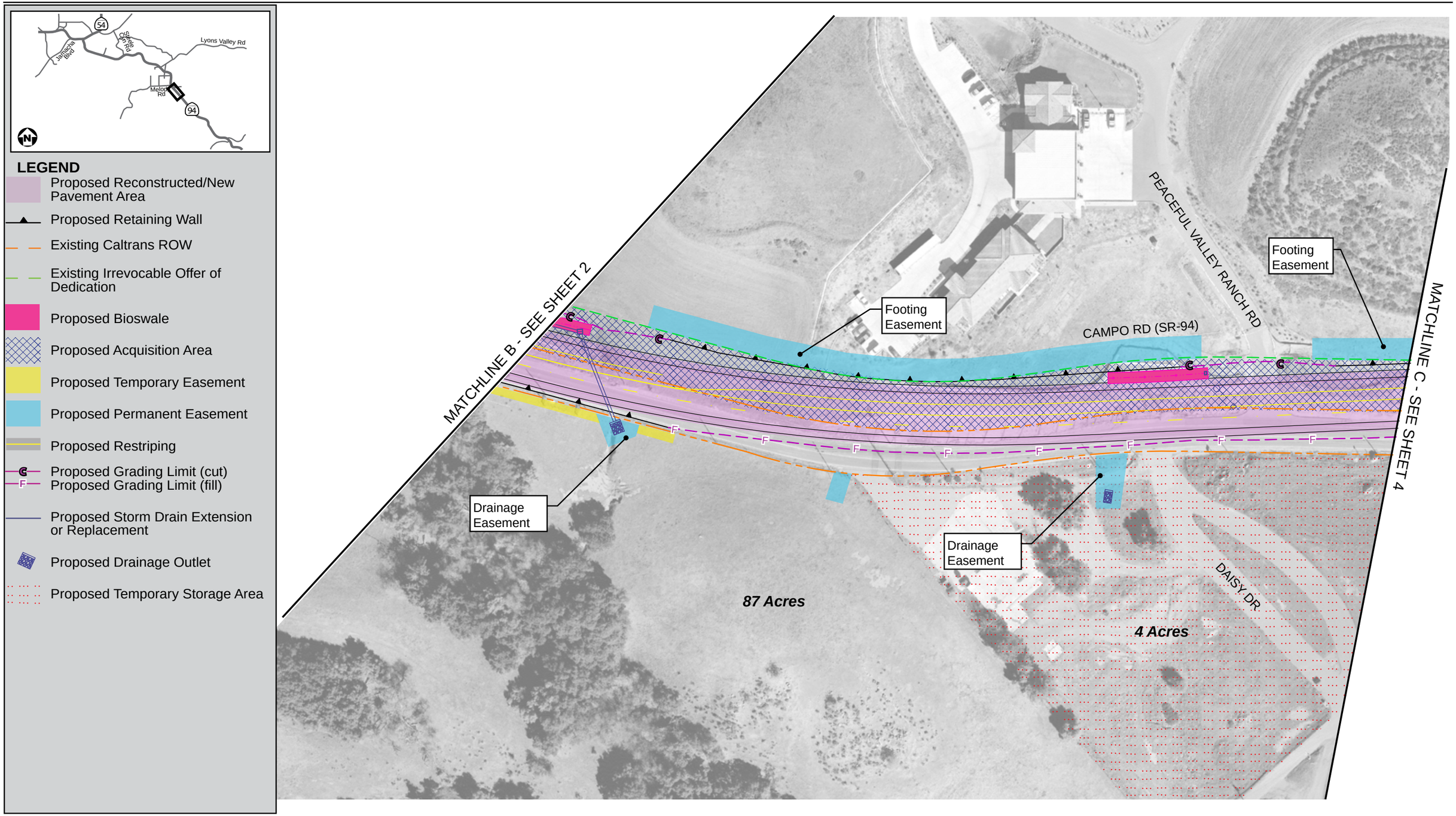
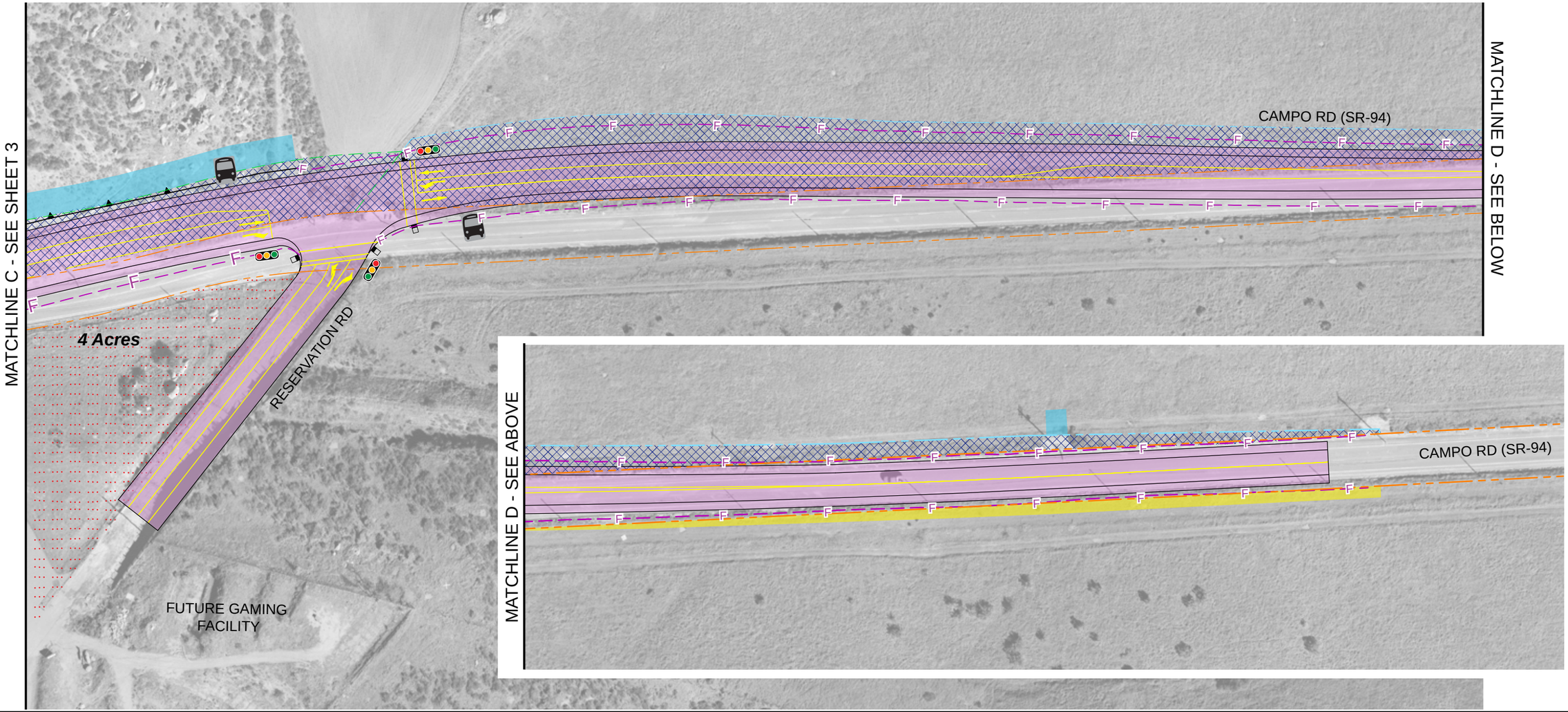
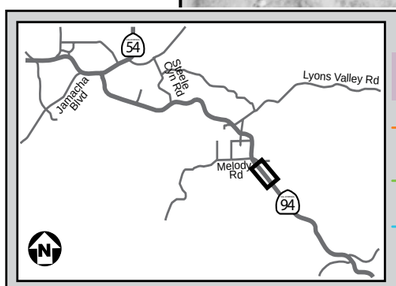


Figure 1-9
Reservation Road Access Alignment (Sheet 3-4)





LEGEND

- Proposed Reconstructed/New Pavement Area
- Existing Caltrans ROW
- Existing Irrevocable Offer of Dedication
- Proposed County ROW
- Proposed Acquisition Area
- Proposed Temporary Easement
- Proposed Permanent Easement
- Proposed New Traffic Signal
- Proposed Restriping
- Proposed Retaining Wall
- Proposed Grading Limit (cut)
- Proposed Grading Limit (fill)
- New or Existing Bus Stop to be Upgraded
- Proposed ADA Pad for Pedestrian Crossings
- Proposed Temporary Storage Area

200 100 0 200

Figure 1-9
Reservation Road Access Alignment (Sheet 4-4)

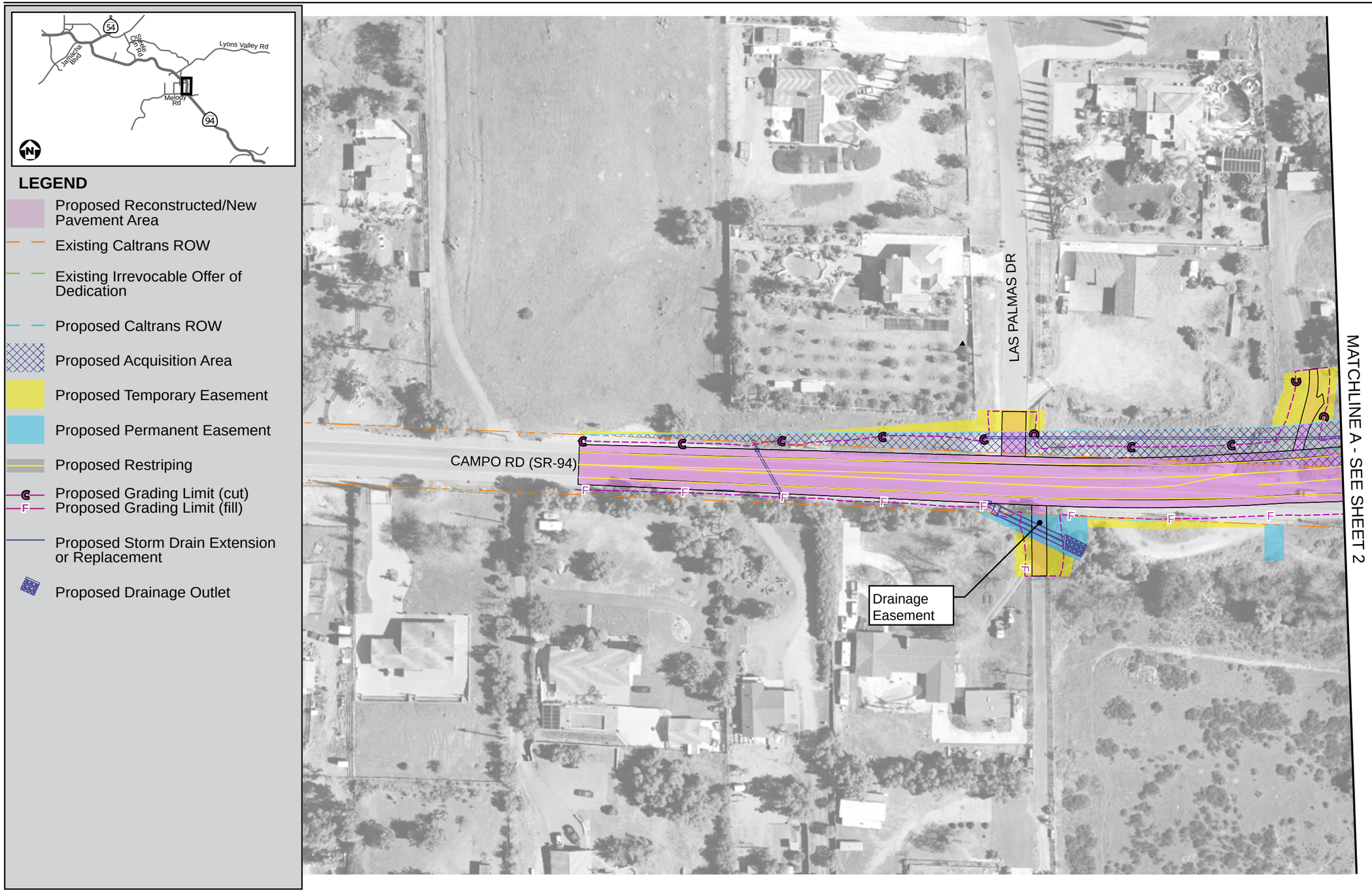


Figure 1-10
Preferred Alternative - Daisy Drive Access ; Option 1 Full Footprint (Sheet 1-4)

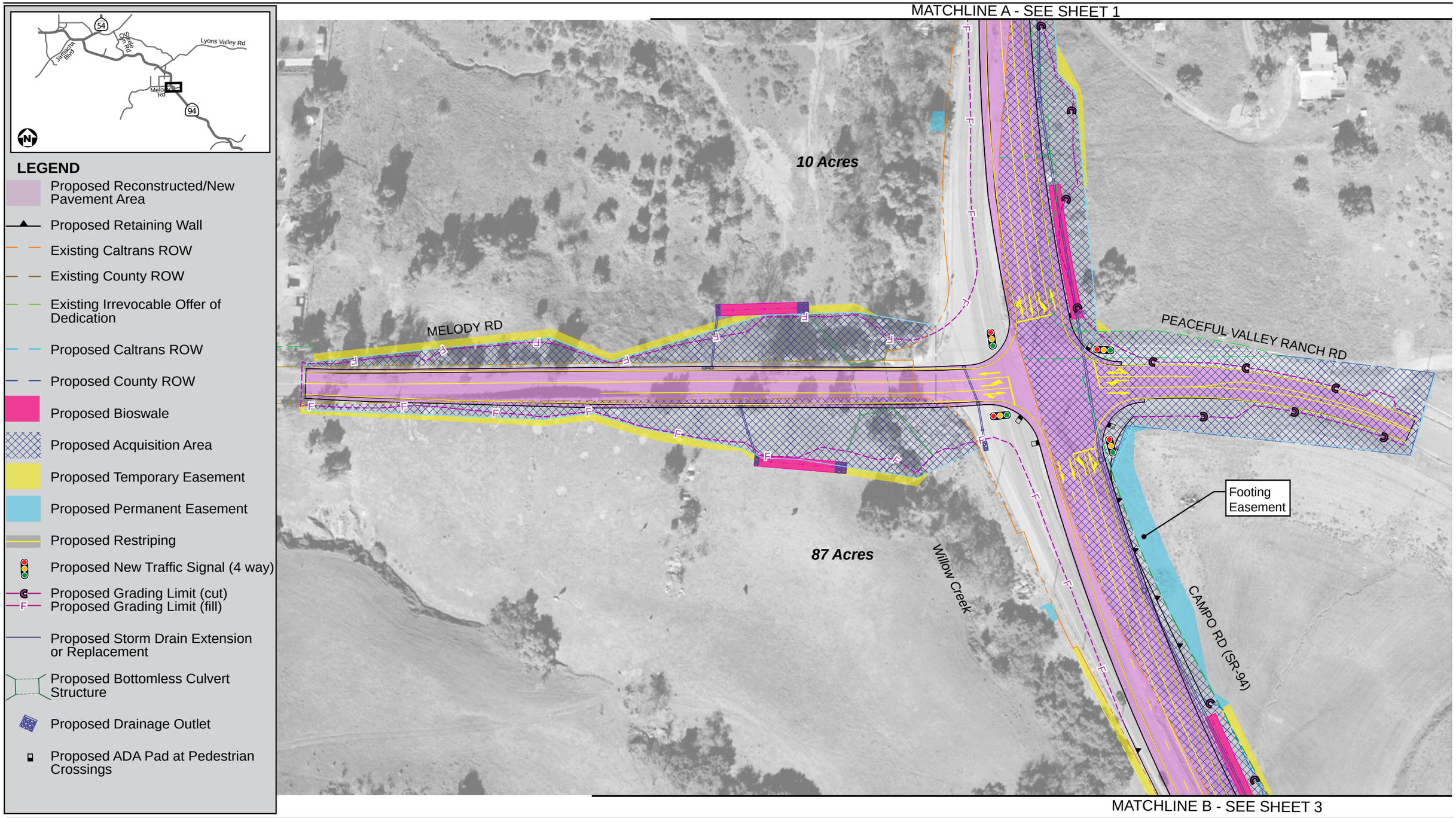


Figure 1-10
Preferred Alternative - Daisy Drive Access ; Option 1 Full Footprint (Sheet 2-4)

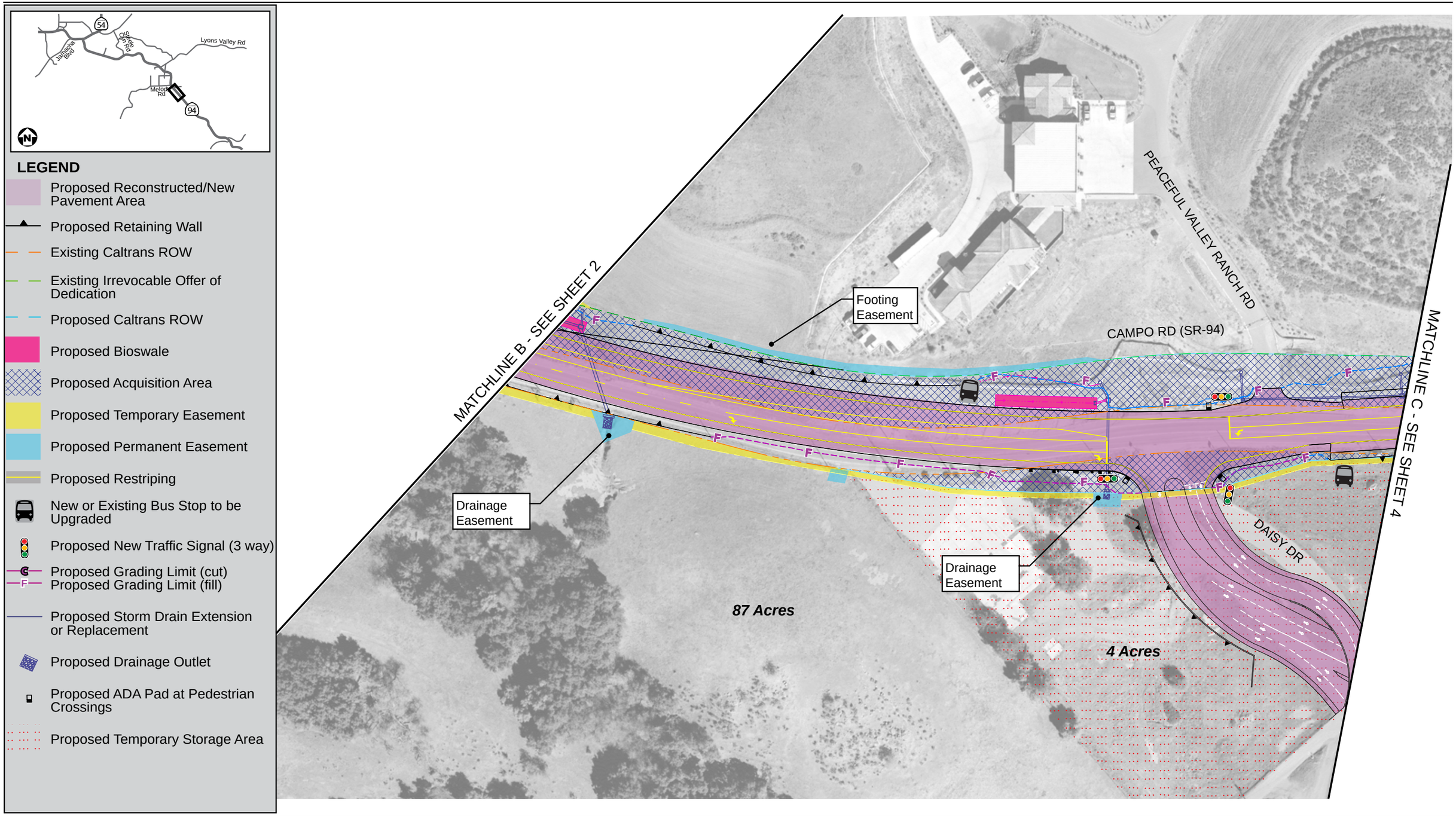


Figure 1-10
Preferred Alternative - Daisy Drive Access ; Option 1 Full Footprint (Sheet 3-4)

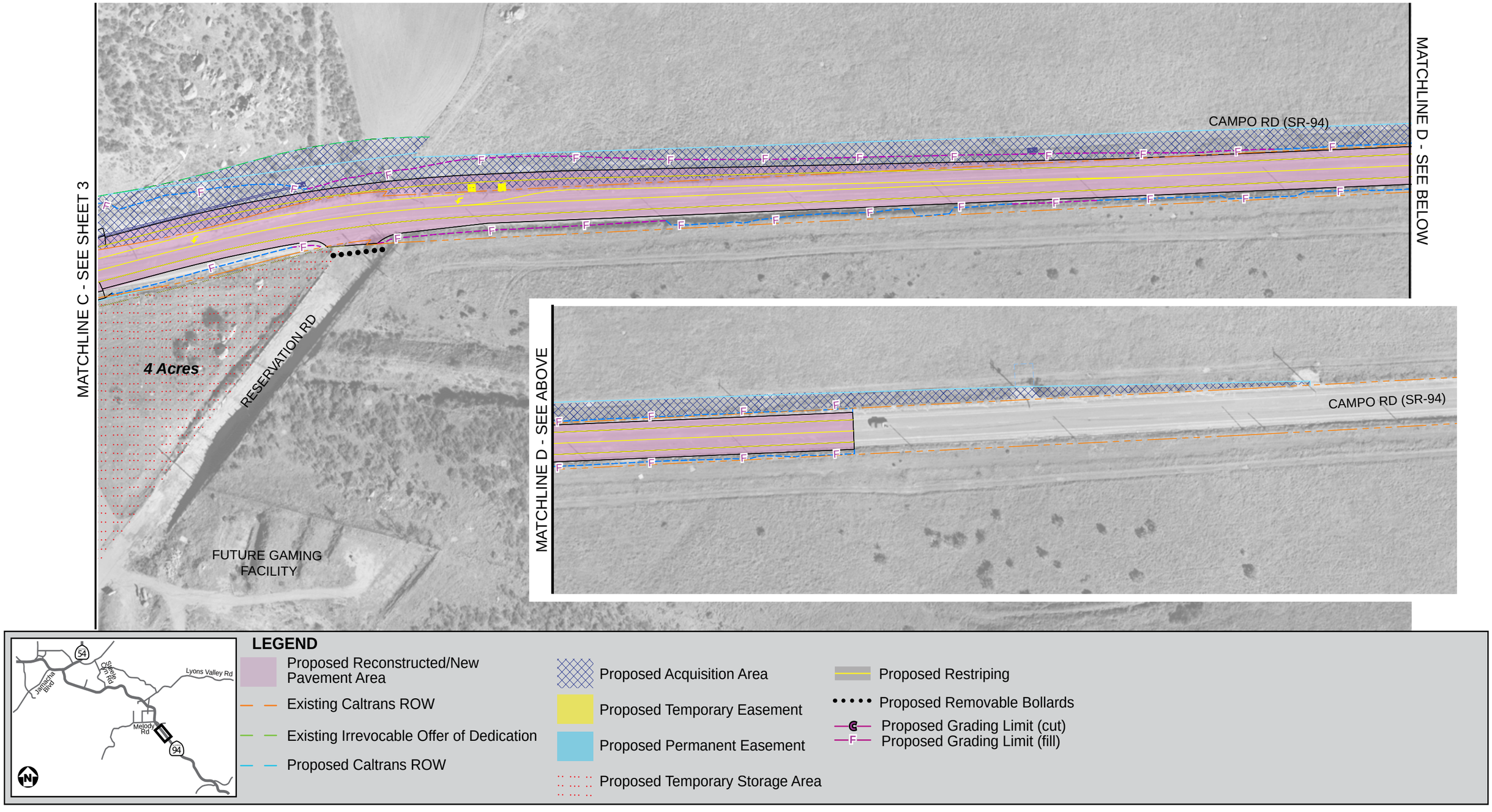


Figure 1-10
Preferred Alternative - Daisy Drive Access ; Option 1 Full Footprint (Sheet 4-4)

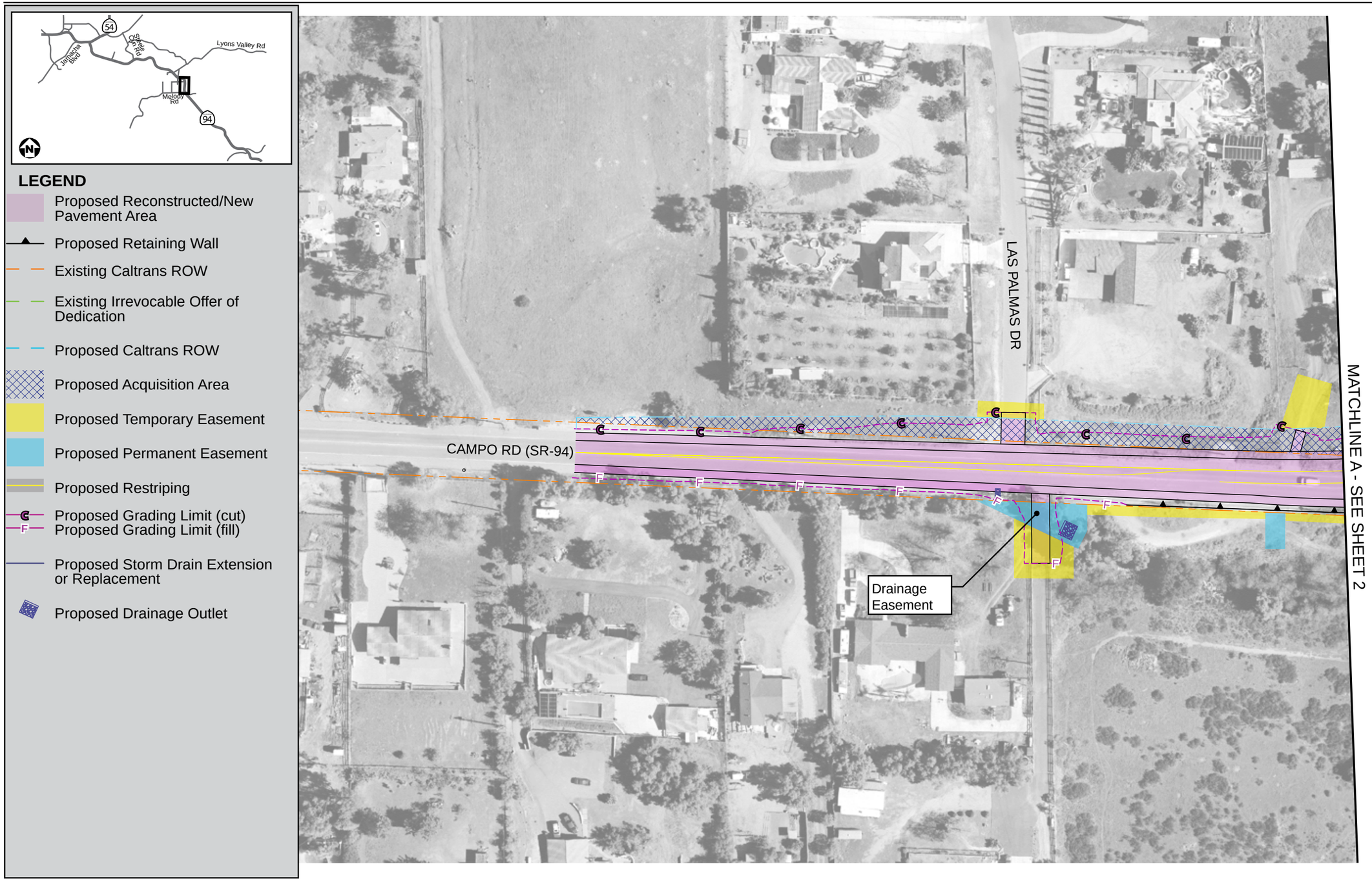


Figure 1-11
Daisy Drive Access Alignment; Option 2 Reduced Footprint (Sheet 1-4)

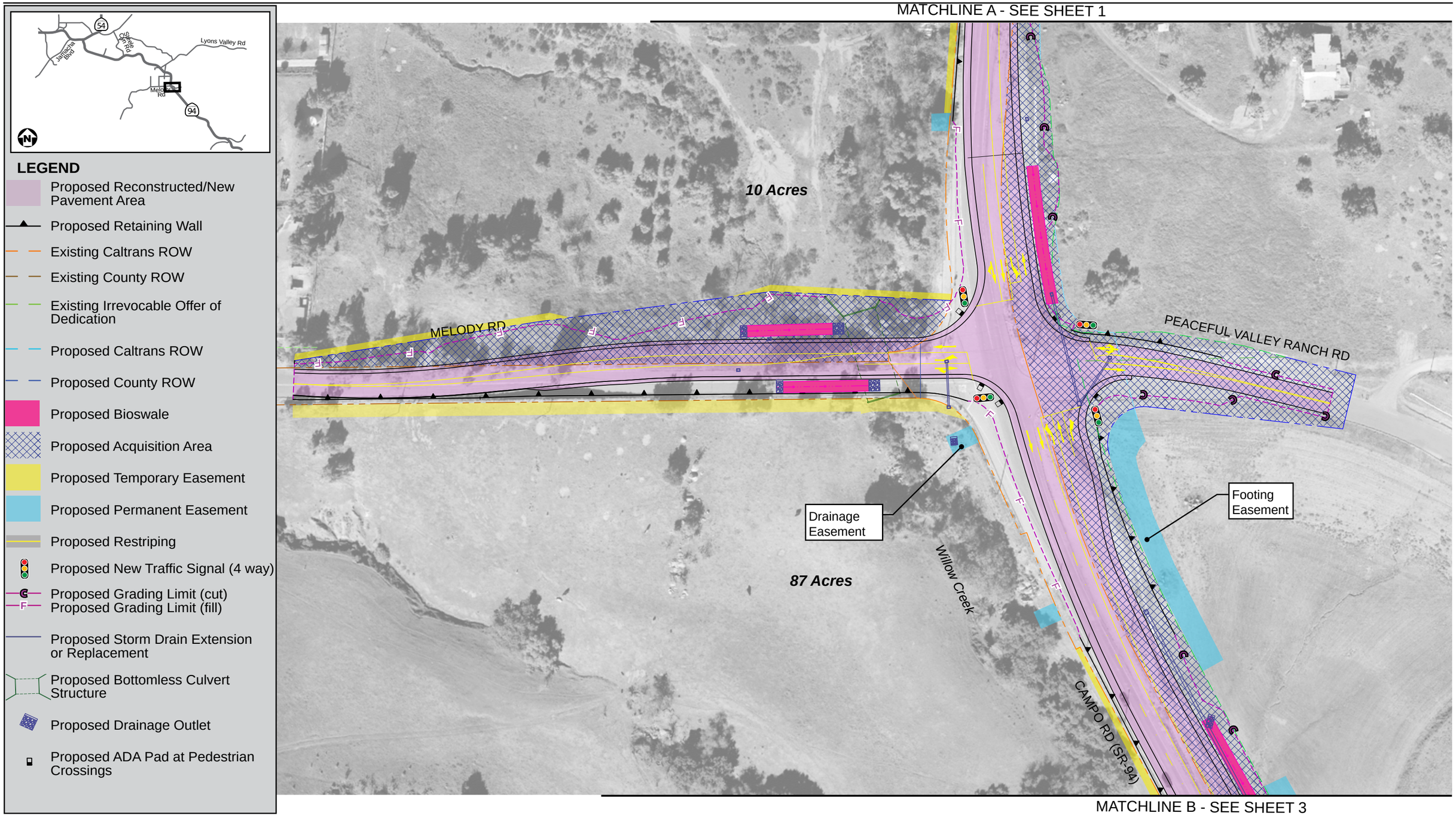


Figure 1-11
Daisy Drive Access Alignment; Option 2 Reduced Footprint (Sheet 2-4)

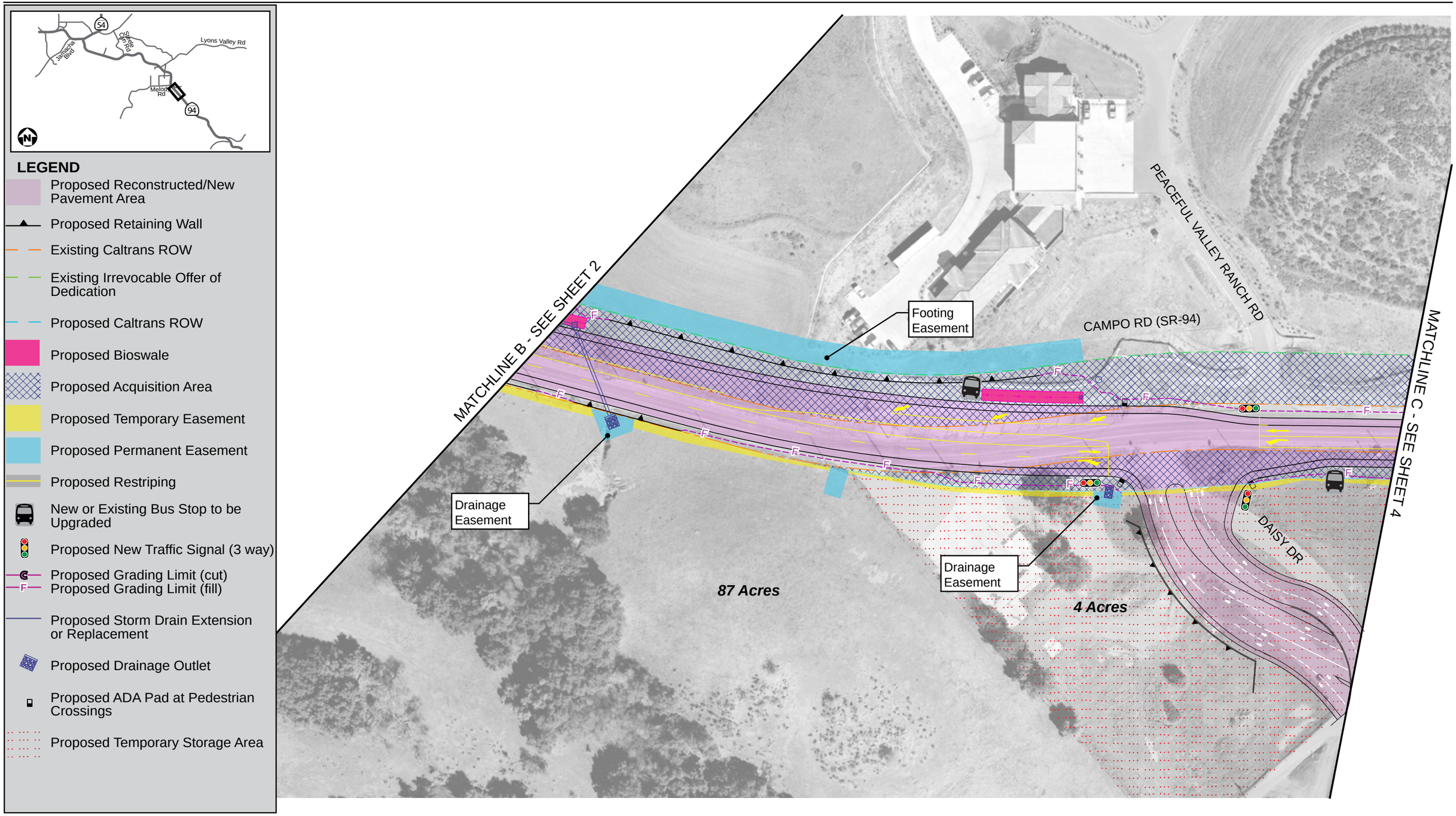


Figure 1-11
Daisy Drive Access Alignment; Option 2 Reduced Footprint (Sheet 3-4)

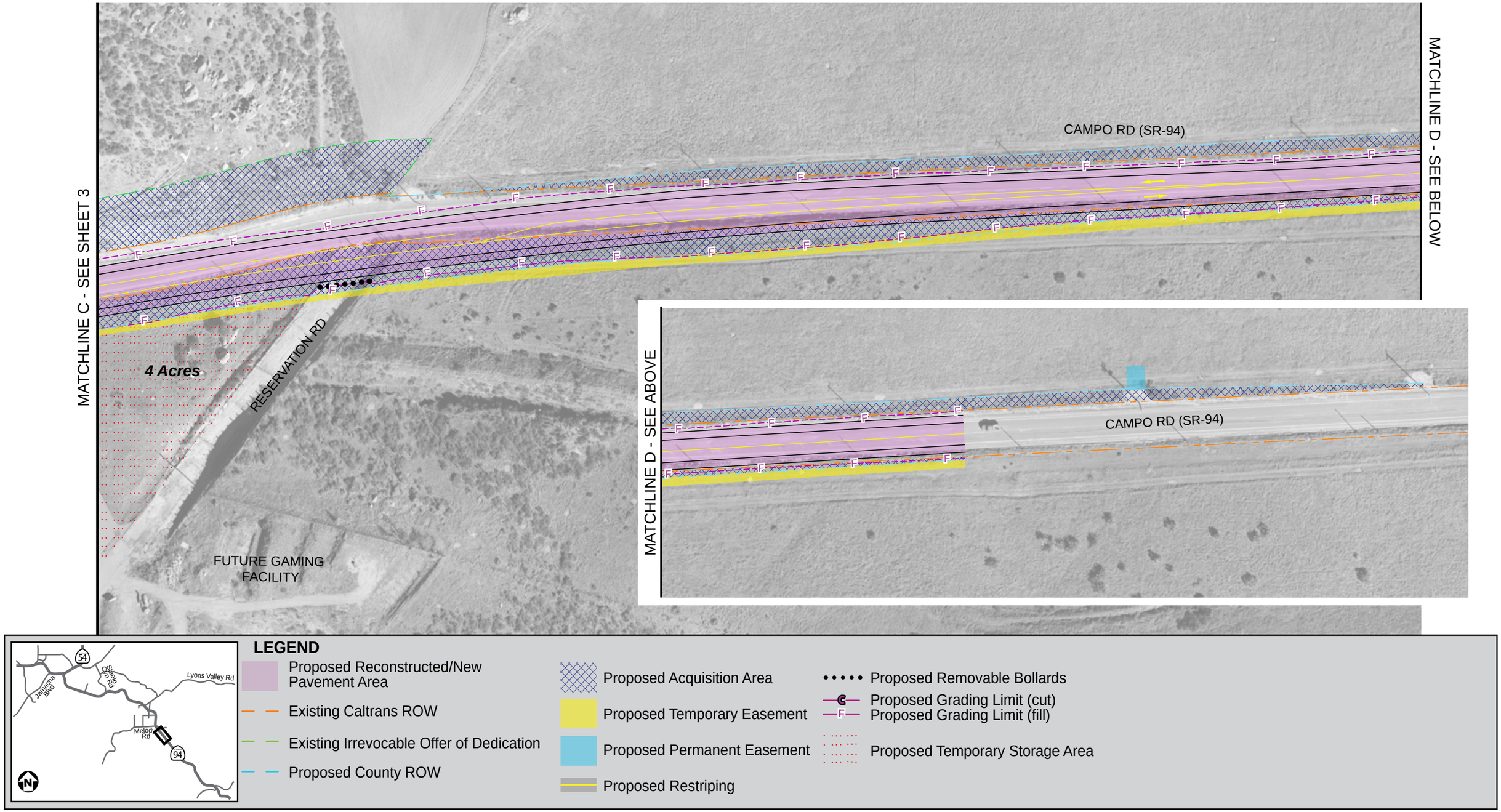


Figure 1-11
Daisy Drive Access Alignment; Option 2 Reduced Footprint (Sheet 4-4)

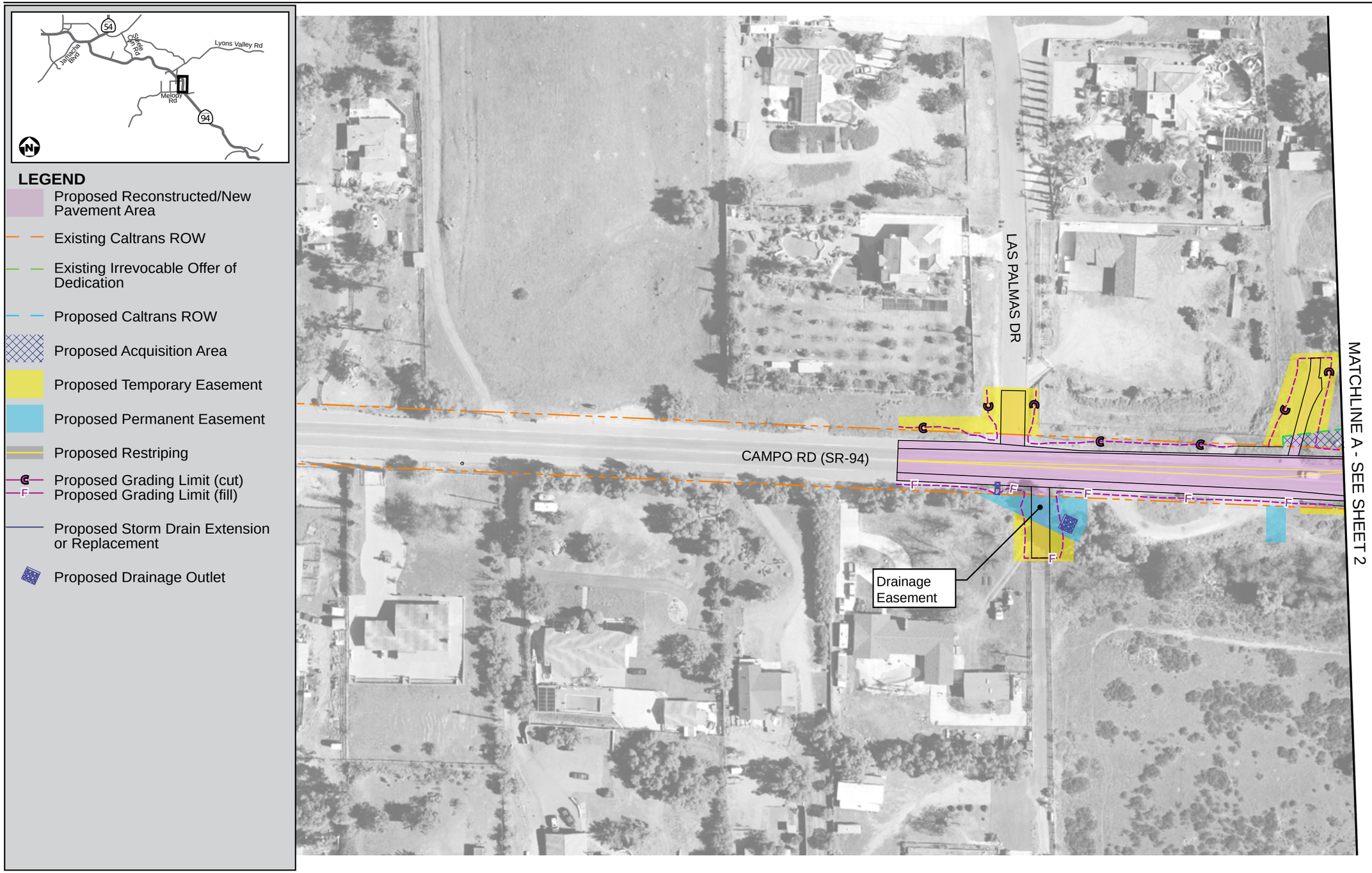


Figure 1-12
Daisy Drive Access Alignment; Option 3 Minimum Footprint (Sheet 1-4)

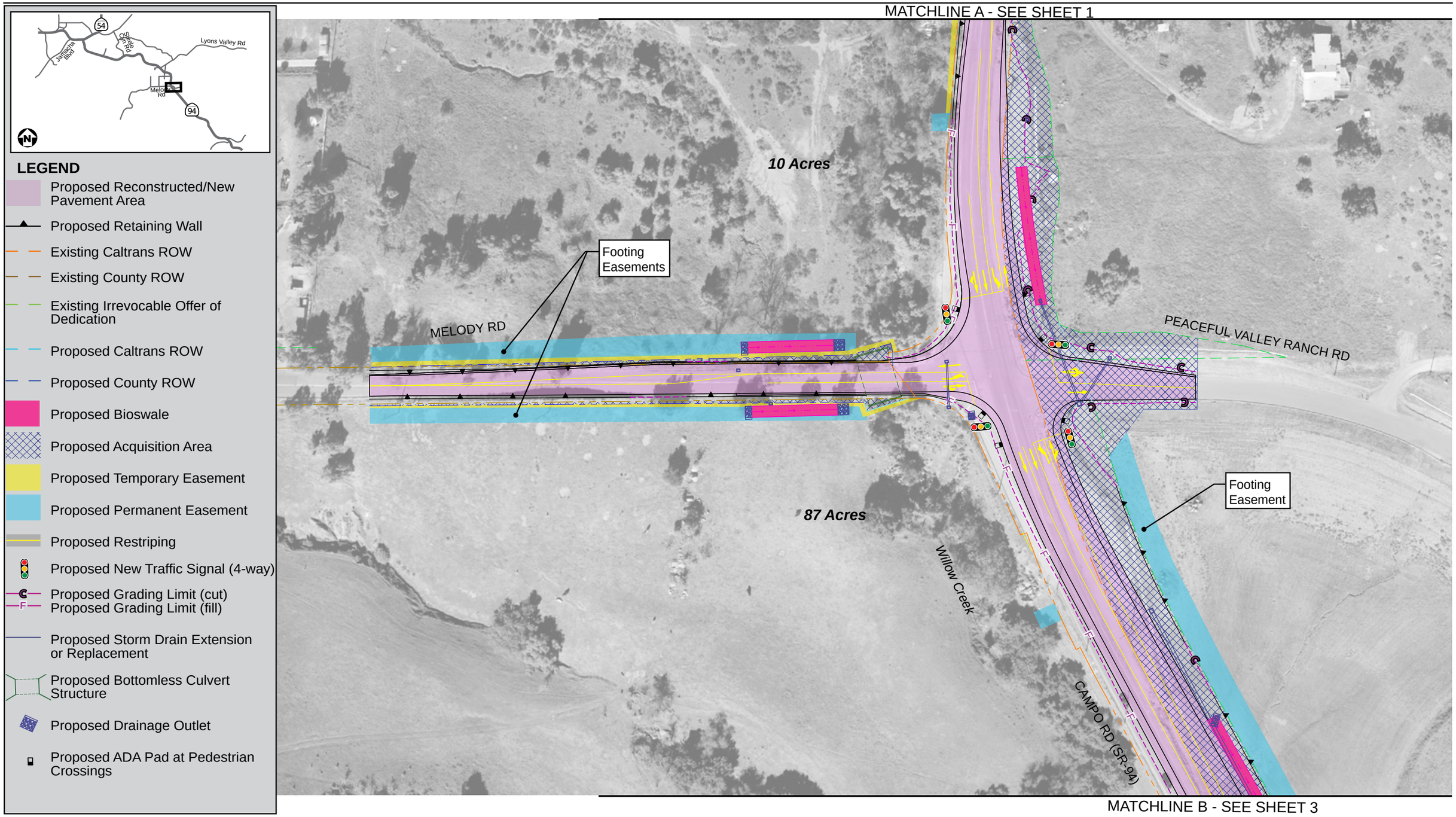


Figure 1-12
Daisy Drive Access Alignment; Option 3 Minimum Footprint (Sheet 2-4)

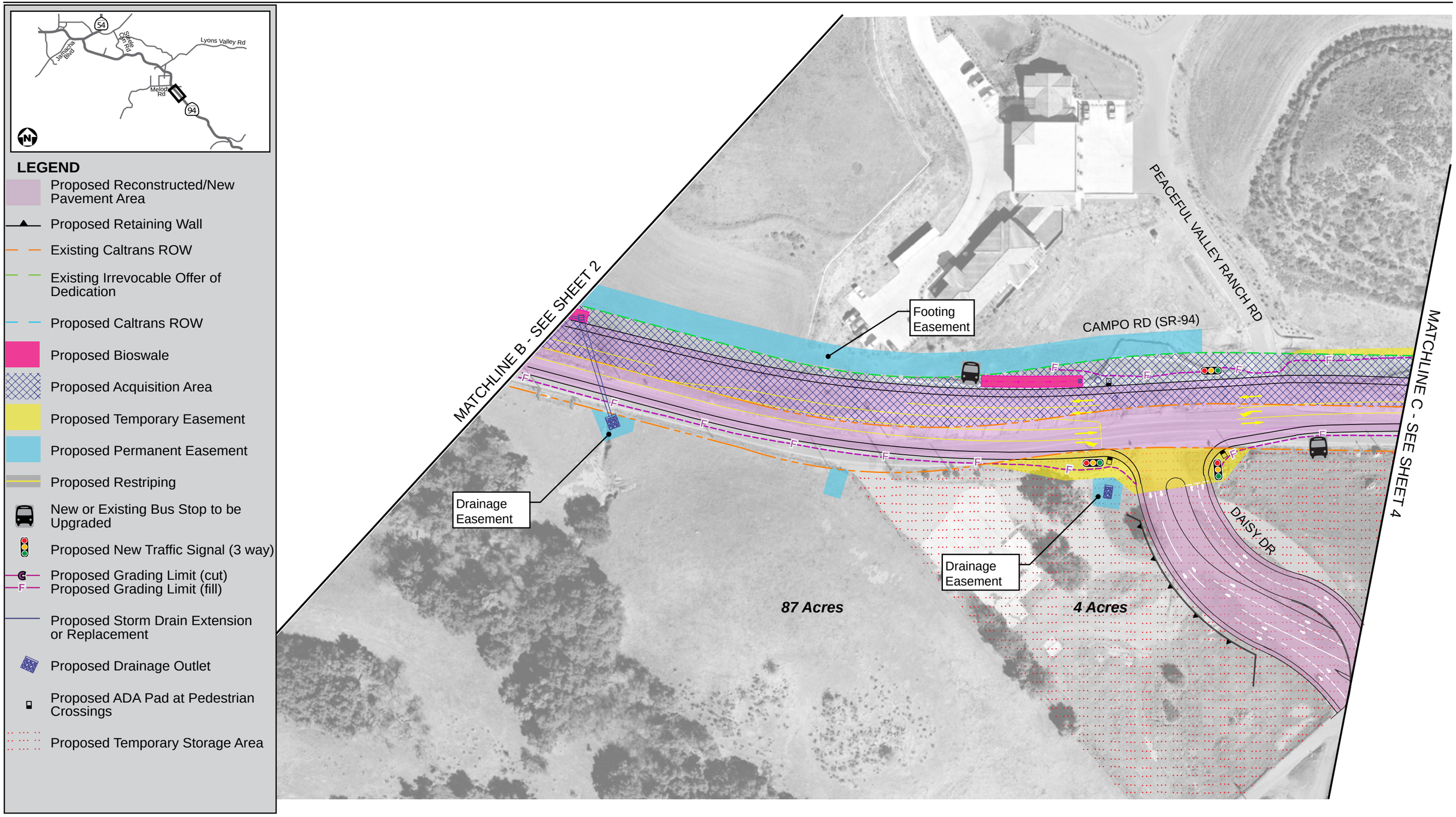
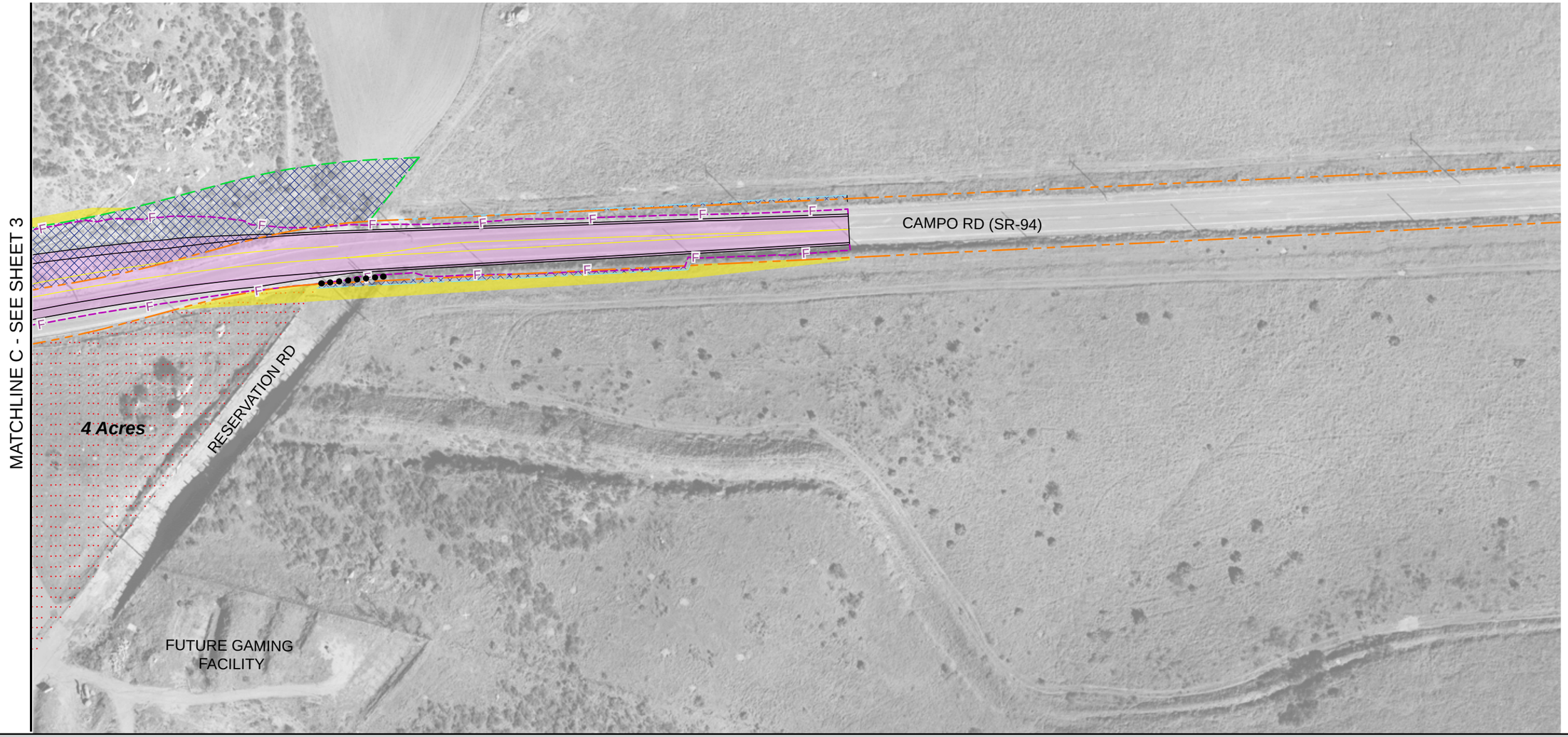
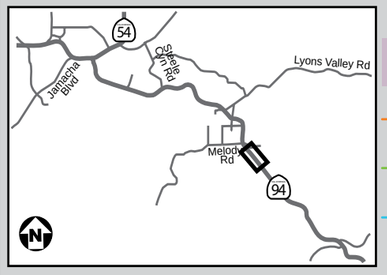


Figure 1-12
Daisy Drive Access Alignment; Option 3 Minimum Footprint (Sheet 3-4)



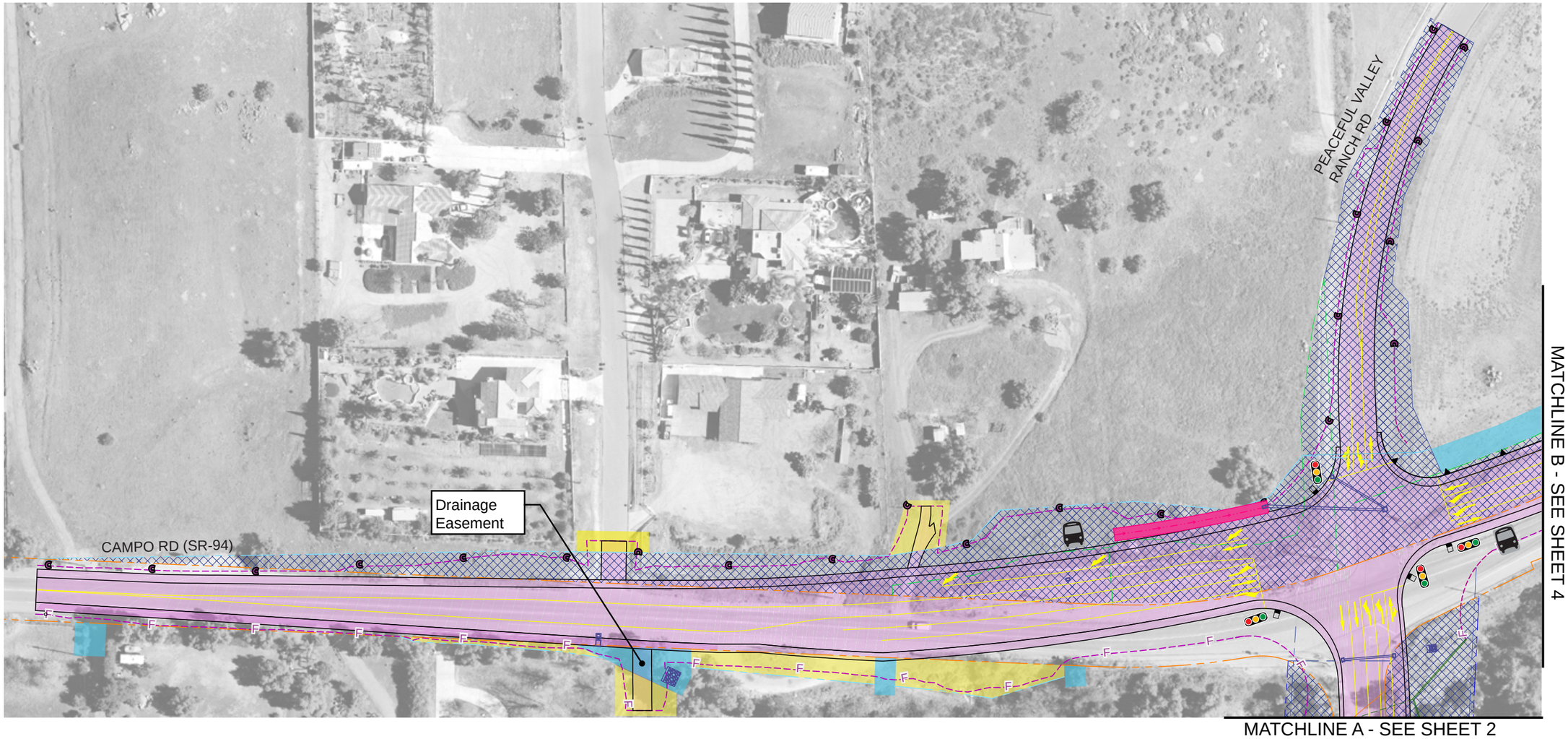


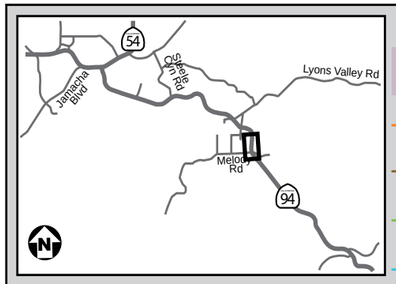
LEGEND

- Proposed Reconstructed/New Pavement Area
- Existing Caltrans ROW
- Existing Irrevocable Offer of Dedication
- Proposed Caltrans ROW
- Proposed Acquisition Area
- Proposed Temporary Easement
- Proposed Restriping
- Proposed Removable Bollards
- Proposed Grading Limit (cut)
- Proposed Grading Limit (fill)
- Proposed Temporary Storage Area

200 100 0 200

Figure 1-12
Daisy Drive Access Alignment; Option 3 Minimum Footprint (Sheet 4-4)





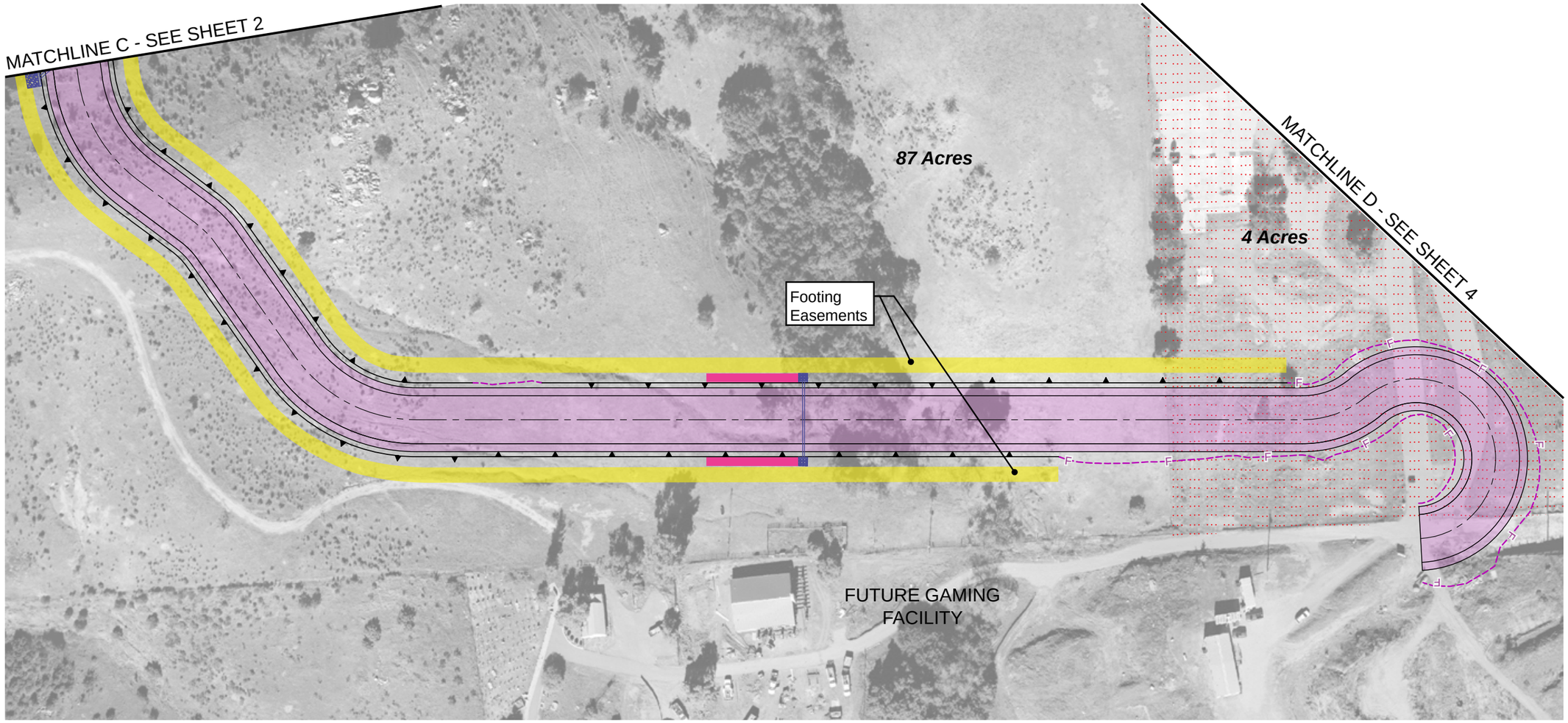
LEGEND

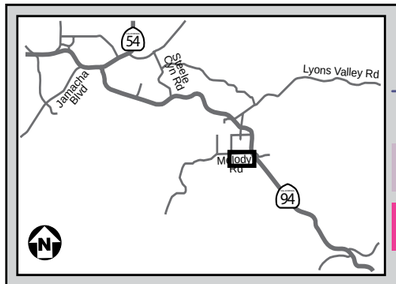
- Proposed Reconstructed/New Pavement Area
- Existing Caltrans ROW
- Existing County ROW
- Existing Irrevocable Offer of Dedication
- Proposed Caltrans ROW
- Proposed County ROW
- Proposed Bioswale
- Proposed Acquisition Area
- Proposed Temporary Easement
- Proposed Permanent Easement
- New or Existing Bus Stop to be Upgraded
- Proposed Restriping
- Proposed Retaining Wall
- Proposed New Traffic Signal (4 way)
- Proposed Grading Limit (cut)
- Proposed Grading Limit (fill)
- Proposed Storm Drain Extension or Replacement
- Proposed Bottomless Culvert Structure
- Proposed Drainage Outlet
- Proposed ADA Pad at Pedestrian Crossings

200 100 0 200

Figure 1-13
Melody Road Access Alignment (Sheet 1-4)

Figure 1-13
Melody Road Access Alignment (Sheet 2-4)



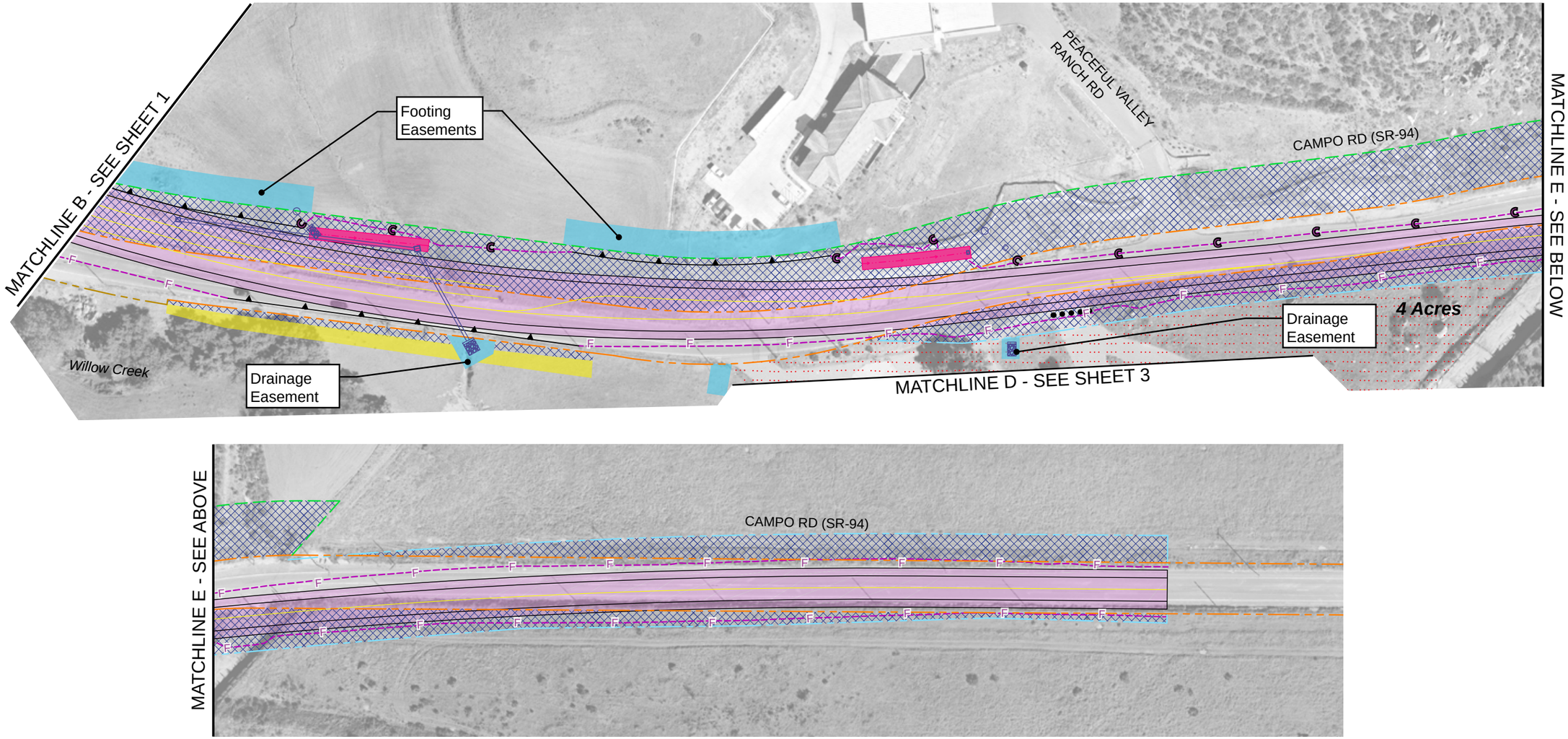


LEGEND

- Proposed Storm Drain Extension or Replacement
- Proposed Reconstructed/New Pavement Area
- Proposed Bioswale
- Proposed Retaining Wall
- Proposed Grading Limit (cut)
- Proposed Grading Limit (fill)
- Proposed Temporary Easement
- Proposed Drainage Outlet
- Proposed Temporary Storage Area

200 100 0 200

Figure 1-13
Melody Road Access Alignment (Sheet 3-4)



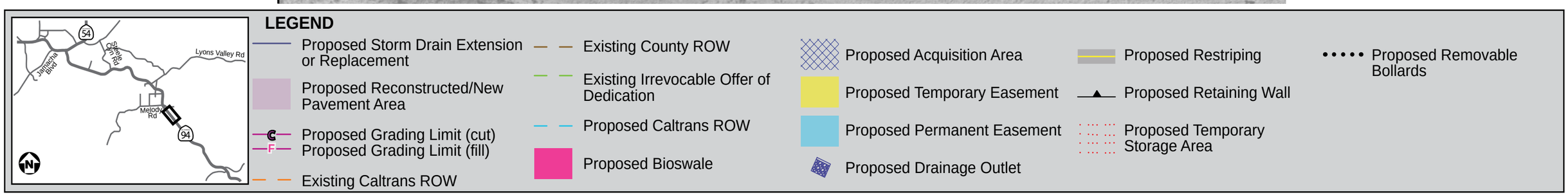


Figure 1-13
Melody Road Access Alignment (Sheet 4-4)

CHAPTER 2.0

ENVIRONMENTAL SETTING, IMPACTS AND MITIGATION MEASURES

Chapter 2 – Environmental Setting, Impacts, and Mitigation Measures

This chapter describes the resources that would be affected by the Proposed Project. As part of the scoping and environmental analysis conducted for the Proposed Project, the following environmental issues were considered, but no adverse impacts were identified. Consequently, there is no further discussion of these issues in this document.

Coastal Zone: The Proposed Project limits are not located within the Coastal Zone.

Wild and Scenic Rivers: There are no designated Wild and Scenic Rivers within the Proposed Project limits.

Farmlands/Timberlands: The Proposed Project limits are not located on land under a Williamson Act contract or within a Timber Production Zone. Proposed Project implementation would not convert farmland to non-agricultural uses or affect any farmlands or timberlands.

Paleontology: Neither the record searches nor surveys indicate any sediments present within the Proposed Project limits that are potentially sensitive for paleontological resources.

Appendix E presents the CEQA Environmental Checklist that identifies factors that may be affected by the Proposed Project. Each of the checklist criteria/questions was addressed and the checklist indicates the manner in which the questions were answered based on the text and analysis in the Final EIR.

For every relevant topic addressed, this chapter presents the regulatory setting and affected environment, then identifies and discusses the impacts of each of the Build Alternatives and the No Project Alternative, and finally, discusses any proposed avoidance, minimization, and/or mitigation measures.

The following impact analysis evaluates both temporary construction-related impacts (*i.e.,* impacts related to temporarily changed physical conditions that occur during construction activities) and permanent impacts (*i.e.,* impacts related to physical conditions that remain changed after construction activities are completed).

The following technical studies were prepared in support of this Final EIR and are incorporated by reference:

1. Community Impact Assessment (June 2014),

2. Visual Impact Assessment (May 2014),

3. Natural Environment Study (June 2014),

4. Archaeological Survey Report for the State Route 94 Improvement Project, San Diego County, California (August 2014) – Available to Authorized Parties [1] upon Request,

5. Historical Resources Compliance Report (August 2014) – Available to Authorized Parties Upon Request,

6. Phase 1 Environmental Site Assessments (June 2014),

7. Noise Study Report (August 2014),

8. Air Quality Study Report (May 2014),

9. Combined Paleontological Identification and Evaluation Report for the SR-94 Improvement Project, San Diego County, California (August 2014) – Available to Authorized Parties Upon Request,

10. Traffic Impact Study (July 2014),

11. District Preliminary Geotechnical Report (September 2013), and

12. SR-94 Improvements PA/ED Drainage Report (March 2014).

The list of technical studies, their authors and date of completion is provided in **Appendix F**.

The analysis of environmental impacts and proposed mitigation measures presented in the following sections of this document are based on preliminary Proposed Project design and current environmental information and circumstances. The impact evaluation for each Proposed Project alternative encompasses the environmental effects of all work required to fully implement that alternative. In order to evaluate the environmental impacts for each alternative, the impact analysis does not differentiate in which jurisdiction the improvements for that particular alternative (i.e., Caltrans ROW, County land, JIV land, or other) are located.

[1] / Due to the sensitive nature of the information, only Authorized Parties are eligible to view this document.

HUMAN ENVIRONMENT

2.1 LAND USE

This section contains a discussion of the existing land use setting for the Proposed Project and surrounding areas and evaluates the potential impacts related to land use and planning during construction and operation of the Proposed Project. This section is based, in part, on the March 2014 Community Impact Assessment (CIA), which is a separate technical study prepared for the SR-94 Improvement Project and incorporated by reference. The Land Use section includes:

- Existing and Future Land Use;
- Consistency with State, Regional and Local Plans and Programs, and
- Parks and Recreational Facilities.

2.1.1 Existing and Future Land Use

2.1.1.1 Affected Environment

Existing Land Use

Regional Setting

The Proposed Project is located in the southwestern portion of San Diego County. San Diego County is the second largest county by area in the state at 4,425 square miles, is home to approximately 3.05 million people, and contains 1.14 million housing units within the incorporated and unincorporated areas. The County extends from the Mexican border to the south, to Orange/Riverside Counties to the north, and Imperial County to the east. The Pacific Ocean forms the western boundary of the County. The population in San Diego County, which grew 10 percent from 2000 to 2010, accounts for approximately 8.26 percent of California's population of 37 million residents.

San Diego County consists of eighteen incorporated cities and numerous unincorporated communities, as well as tribal reservations. The metropolitan area of the City of San Diego is the largest in the County, followed by the cities of Chula Vista, Oceanside and Escondido, respectively. Approximately 55 percent of San Diego County lands are held in the public trust as national forests and state, county or local parks. There are eighteen federally recognized Native American tribal reservations within San Diego County, covering 125,000-acres.

Subregional Setting

The Proposed Project limits traverse two plan areas within the unincorporated portion of San Diego County, that were established by San Diego County and are part of the San Diego County General Plan: the Valle de Oro Community Plan Area and the Jamul/Dulzura Subregional Plan Area (**Figure 2.1-1**).

Valle de Oro Community Plan Area

Two intersection improvements, SR-94/Jamacha Boulevard and SR-94/Jamacha Road, are located within the Valle de Oro Community Plan Area (CPA). The Valle de Oro CPA is located immediately northwest of the Jamul/Dulzura Subregional Planning Area and encompasses approximately 19 square miles and is bounded by El Cajon to the north, La Mesa to the north/northwest, Spring Valley to the west/southwest, and the Jamul/Dulzura Subregional Area to the south/southeast. The Valle de Oro CPA includes several unincorporated communities including Casa de Oro, Mount Helix and Rancho San Diego. As of January 2012, the total population within the Valle de Oro CPA was 41,133 with a total of 15,579 housing units. Regional Access to the CPA is provided by SR-94 and SR-54.

The Valle de Oro CPA contains a mix of residential and commercial uses. Existing residential development in the Casa de Oro/Mount Helix area occurs near Campo Road and SR-94, as well as on the slopes of Mount Helix and in areas to the east near Jamacha Road. The Rancho San Diego area contains single-family housing on small lots, as well as large-scale apartment, condominium and senior-housing projects adjacent to commercial areas and transportation corridors. The Vista Grande Hills area consists of low-density single-family development. In addition to the residential areas listed above, the Valle de Oro CPA includes the following commercially designated areas: Campo Road near Bancroft Drive; Casa de Oro Shopping District; Rancho San Diego Shopping District; Avocado Boulevard at Fuerte Drive; Rancho San Diego commercial areas; and Jamacha Road at Chase Avenue. San Diego County adopted the revised Valle de Oro Community Plan in August 2011.

Jamul/Dulzura Subregional Area

Three intersection improvements, SR-94/Steele Canyon Road, SR-94/Lyons Valley Road and SR-94/Maxfield Road, and the Access Road Alignments are located within the Jamul/Dulzura Subregion.

The Jamul/Dulzura Subregion encompasses approximately 168-square miles extending southward to the U.S./Mexico border. Land within the Jamul/Dulzura Subregion is characterized by rolling hills with flat, broad valleys. As of January 2012 the Jamul/Dulzura Subregion was home to approximately 9,542 people and 3,305 housing units. There are several unincorporated communities within the Jamul/Dulzura Subregion, including Jamul, Steele Canyon, Dulzura and

Barrett Junction. The unincorporated Jamul community, located in the northwestern portion of the Jamul/Dulzura Subregion, is the largest of these communities and houses a majority of the Subregion's population. State Route 94, which traverses the Subregion in a northwest to southeast direction, provides regional access to the area.

The northwest section of this Subregion has recently felt residential growth pressures, according to the San Diego County Jamul/Dulzura Subregional Plan. Commercial development, consisting primarily of strip commercial, is generally confined to two nodes in the Jamul Community. The first node is around the SR-94/Steele Canyon Road intersection, and the second is around the SR-94/Jefferson-Maxfield Road intersections. Agricultural uses occur in small, scattered areas and include dry land farming, grazing, and some row crops.

The unincorporated Jamul community area (census designated place) covers a land area of 17 square miles. The JIV Tribal Lands, measuring approximately six acres in size, is the only Tribal Lands within the unincorporated Jamul community. Within the vicinity of the Access Road Alignments, existing land uses consist primarily of rural residences and open space. The natural terrain consists of sparsely vegetated rocky hillsides with open tree-lined drainages, and is interrupted by vegetated rural residential lots. The San Diego Rural Fire Protection District (SDRFD) operates out of a fire station accessed from Peaceful Valley Ranch Road.

To the south of the JIV Tribal Lands and west of SR-94 is the approximate 4,800- acre Rancho Jamul Ecological Reserve (RJER), which was transferred to CDFW for preservation purposes and serves as a Core area for the MSCP. To the northeast of the RJER is the Hollenbeck Canyon Wildlife Area (HCWA). Both the RJER and the HCWA are owned by the State of California and managed by CDFW for conservation purposes (**Figure 2.1-2**). Rancho Jamul Estates, a low-density residential development, is located approximately 0.7 miles southeast of Reservation Road. Rural residences are located in the hilly terrain in the vicinity. Residential lots are large, ranging from just under one acre to over ten-acres.

East of SR-94 and south of Peaceful Valley Ranch Road is Peaceful Valley Ranch. This major subdivision approval created 57 estate residential, equestrian, open space, and public fire service lots on approximately 181-acres. The San Diego County General Plan re-designations and rezoning approvals allowed for increased residential densities on the residential portion of the Peaceful Valley Ranch land, while also allowing for a Major Use Permit for spectator events at a private equestrian/polo training facility. To date, only a Fire Station for the Rural Fire Protection District has been constructed on the Peaceful Valley Ranch property. SR-94 forms the western boundary of Peaceful Valley Ranch, while Melody Road forms a portion of the northern boundary. A portion of Daley Ranch forms the southern boundary and a mixture of private properties form the eastern boundary. Primary access to Peaceful Valley Ranch is via SR-94 and Peaceful Valley Ranch Road, which is located across from Melody Road.

Partly as a result of population growth, San Diego County has increased efforts to preserve habitat for endangered species and other natural resources. Population growth is expected to center primarily in the Jamul community, west and north of the proposed access road improvements. San Diego County adopted the revised Jamul/Dulzura Subregional Plan in August 2011.

Proposed Project Setting

The setting description below presents the existing setting within each of the Non-Access Road Intersection Proposed Project limits and the Access Road Alignment Proposed Project limits.

State Route 94/Jamacha Boulevard Intersection: The SR-94/Jamacha Boulevard intersection is located at the northwestern end of the Proposed Project limits. Land uses include the intersection, which includes four-way signalization, paved pedestrian/wheelchair accessible waiting areas on all four corners, cross-walks, paved curbs and gutters, stormwater drainage, highway guard rails, utility boxes, highway identification/directional signage, and paved through/turning lanes. Overhead power poles/lines do not exist within the Proposed Project limits of this intersection.

Adjacent to the intersection, land uses include undeveloped/open space land to the west and south of the intersection, the Skyline Wesleyan Church land to the north/northwest of the intersection, and undeveloped land northeast of the intersection (**Figure 2.1-3**).

Some of the local traffic using the SR-94/Jamacha Boulevard intersection originates from development located southwest of and adjacent to Jamacha Boulevard, which terminates at SR-94. Traveling in a southwesterly direction from SR-94 along Jamacha Boulevard, land uses encountered include multi-family residential and commercial uses. The nearest residences to the intersection are located approximately 1,500 feet to the west at the Avenida Roberta cul-de-sac (single-family residential). Residents from this area have access to SR-94 from either SR-94/Jamacha Boulevard, SR-94/Sweetwater Springs Boulevard, or SR-94/Kenwood Drive intersections. No schools, colleges, libraries, hospitals or parks exist in the vicinity of the intersection.

State Route 94/Jamacha Road Intersection: The intersection includes paved through/turning lanes, four-way signalization, paved pedestrian/wheelchair accessible waiting/sidewalk areas on all four corners, cross-walk on the south side, paved curbs and gutters, business landscaping on the north and southeast side, raised medians, highway guard rails, electrical boxes, and highway identification/directional signage. Overhead power poles/lines do not exist within the Proposed Project limits.

Neighborhood/General Commercial uses dominate the urban landscape adjacent to the SR-94/Jamacha Road intersection (**Figure 2.1-3**). The two main shopping centers near this

intersection include the Rancho San Diego Shopping Center located at the southeast corner of the intersection (Target, Albertsons, Edwards Theatre and others), and the Plaza Rancho Shopping Center located northeast of the intersection (includes Bank of America, US Bank, Leslie's Pool Supplies, Sprint and others). Strip commercial (Union 76 gas station and Circle K convenience store) is located northwest of the intersection.

The San Diego County Department of Public Works Corporation Yard is located southwest of the intersection. No schools, colleges, churches, libraries, hospitals or parks exist in the vicinity of the proposed intersection improvements. Cuyamaca College is located east of the intersection, but access to the College (via Cuyamaca College Drive West) would not be directly affected by the proposed intersection improvements because that access is located approximately 1,100 feet to the northeast of the SR-94/Jamacha Road intersection and thus outside of the Proposed Project limits for the improvements proposed at this intersection.

State Route 94/Steele Canyon Road Intersection: The intersection and highway Proposed Project limits include paved through/turning lanes, four-way signalization, paved curbs and gutters/storm drainage, business landscaping on the northeast corner and southeast of the intersection, overhead power poles/lines both north and south of SR-94, paved business driveways both north and south of SR-94, paved surface parking south of SR-94, electrical boxes, and highway identification/directional signage.

Commercial land uses are the dominant land uses adjacent to the SR-94/Steele Canyon Road intersection (**Figure 2.1-4**). Commercial uses south of the intersection are within two buildings and an adjacent nursery. On the south side, uses include Steele Canyon Produce, Jamul Flower, and Bravo Café in one building, and the Greek Sombrero Restaurant in the other. East of these commercial buildings is the Jamul Nursery. West of the commercial buildings is undeveloped residential frontage. The Jamul Nursery is east of the commercial buildings. Undeveloped frontage is west of the commercial buildings.

On the north side of SR-94, land uses include paved driveways/parking for commerical businesses, undeveloped frontage, utility poles/boxes, intersection signal at the Steele Canyon Road intersection, and subsurface stormwater drainage. North of SR-94, west of the intersection, is Ranch Feed/Pet Supply, the carpentry shop for Fenstermann Pivot Doors, and undeveloped residential frontage further to the southwest of the intersection. North of SR-94, east of the intersection is a 7 Eleven with a gas station with the Plaza La Tienda retail strip behind. Land within the Proposed Project limits east of the Plaza La Tienda retail strip is undeveloped.

No schools, colleges, churches, libraries, hospitals or parks exist in the vicinity of the intersection. Steele Canyon County Park and Jamacha Elementary School are located approximately 1.25 miles north of the intersection at Steele Canyon Road and Jamul Drive. Vehicles departing the school or park can use either SR-94 (south) or Willow Glen Drive (north).

State Route 94/Lyons Valley Road Intersection: The intersection includes paved through/turning lanes, stop signs north and south of SR-94, asphalt curbs and gutters at the intersection, business landscaping on the northeast corner and southeast of the intersection, fire hydrant southwest of the intersection, monument signs for Indian Springs southwest and east of the intersection, overhead power poles/lines on the south side of SR-94, paved business driveways on the southwest and northeast side of SR-94, guard railing southeast of the intersection and highway identification/directional signage.

Commercial, residential and open space uses surround the SR-94/Lyons Valley Road intersection (**Figure 2.1-5)**. Uses immediately surrounding the intersection include the Indian Springs residential gated community and Taproot Montessori Preschool south of the intersection, commercial land uses on the northeast and southwest corners, and access to a single-family residence off the northwest corner of the intersection (via Lyons Valley Road). Overhead utilities/utility boxes and highway railing, stop signs/street signs exist along the two-lane highway.

Single-family residences northeast of the intersection use Lyons Valley Road as a primary means of access to SR-94. An alternative route out of the area from Lyons Valley Road exists from Jamul Drive to Steele Canyon Drive.

No colleges, churches, libraries, hospitals or parks exist within the vicinity of the intersection. As mentioned previously, the Taproot Montessori Pre-School is located southeast of the intersection with access directly onto both Lyons Valley Road and SR-94 near the intersection.

State Route 94/Maxfield Road Intersection: The intersection includes paved through/turning lanes (northbound)/shoulder, stop sign on the south side of the intersection, storm drainage, overhead power poles/lines north of SR-94, unpaved access drive north side of SR-94, and highway identification/directional signage.

Open space, residential and commercial uses surround the SR-94/Maxfield Road intersection (**Figure 2.1-5)**. Rural commercial uses to the south include Jamul Feed and Supply southeast of the intersection and a Post Office and Jamul Office Plaza (insurance, security, real estate, etc.) southwest of the intersection. In the area of the intersection, a private dirt drive to a single-family residence exists on the east side of SR-94 opposite Maxfield Road.

Frontage property beyond existing pavement traveling north on SR-94 within the Proposed Project limits includes undeveloped frontage, overhead utility poles, various signs including bus stop, directional, pedestrian, and signal signs, and an unpaved pull-out area.

No colleges, churches, libraries, hospitals or parks exist within the vicinity of the intersection. A veternary hospital does exist between within the shopping center between Maxfield Road and Lyons Valley Road.

Access Road Alignments: Residential, open space, preserve/reserve, and tribal land surround the Access Road Alignment (**Figure 2.1-6**). State Route 94 is a two-lane paved highway through the entire length of the access road Proposed Project limits. The detailed setting description provided below begins in the northern portion of the Access Road Alignment Proposed Project limits and proceeds to the southern end.

Land fronting SR-94, north of the Melody/Peaceful Valley Ranch Road intersection, consists of rural residential uses including access to single-family residences set back from the highway. Land immediately fronting SR-94 includes undeveloped grasslands, riparian habitat near Willow Creek, gravel shoulders adjacent to the paved highway, an unpaved pullout area from the highway, fire hydrants, a call box, stormwater drainage, overhead power poles/boxes, directional signs, paved and unpaved private residential driveways from SR-94, mailboxes, and paved County road intersections. The SDRFD station that was formerly located on a 4-acre parcel owned by the Tribe (located immediately north of the JIV Tribal Lands), has been removed and only the concrete pads remain. That 4-acre parcel is currently vacant, with building slabs, pavement, and a paved driveway (known as "Daisy Drive") that serves the JIV Tribal Lands.

Melody Road is a two-lane paved County road that begins at SR-94 and provides access to/from SR-94 for single-family residences to the west and north. Land adjacent to Melody Road includes undeveloped grasslands, riparian habitat near Willow Creek, a culvert structure for Willow Creek where it crosses under Melody Road, fences, overhead utility poles/boxes, rock outcropping, unpaved private drives and mailboxes. Land south of Melody Road on the west side of SR-94 is undeveloped land used for cattle grazing. There are two undeveloped parcels (87-acre parcel and 4-acre parcel) fronting the west side of SR-94 between Melody Road and the JIV Tribal Lands. Within the 87-acre parcel south of Melody Road is Willow Creek and its associated riparian habitat. The remainder of the 87-acre parcel is vacant and has historically been used for cattle grazing. The 4-acre parcel is owned by the JIV and is currently being used as a staging area for the JIV Gaming Development Project under construction. Frontage land along the 4-acre parcel includes utility poles, rock outcroppings, roadway directional sign, JIV Tribal Land directional sign, stormwater drainage, and a fire hydrant.

Peaceful Valley Ranch Road is a two-lane paved County road on the east side of SR-94 across from Melody Road. This road currently provides access to the recently relocated/constructed fire station and a private residence located north of the fire station. Land along Peaceful Valley Ranch Road includes undeveloped grasslands and overhead utility poles. Land south of the Peaceful Valley Ranch Road intersection on the east side of SR-94 includes the IOD Land. The IOD Land extends from Peaceful Valley Ranch Road in the north to Hollenbeck Wildlife Preserve in the south. The IOD Land includes undeveloped frontage, overhead power poles, surface-to-subsurface stormwater drainage, roadway directional sign, and a paved emergency access drive to the fire station.

The JIV Tribal Lands are located immediately south of the 87-acre and 4-acre parcels and west of SR-94. Reservation Road historically provided access to the JIV Tribal Lands; however, the two-lane roadway is currently inaccessable and barricaded while construction work on the JIV Gaming Development project is underway. Current access to the JIV Tribal Lands is provided via Daisy Drive through the adjacent 4-acre parcel. The western portion of the JIV Tribal Lands contains a Community Center, Tribal Office and associated surface parking. The remainder of the Tribal Lands is currently being developed for the JIV Gaming Development project.

Land south of the JIV Tribal Lands includes the Rancho Jamul Ecological Reserve west of SR-94 and Hollenbeck Canyon Wildlife Preserve east of SR-94. Each of these lands are owned by the State and operated by CDFW. Frontage land south of the JIV Tribal Lands includes undeveloped grasslands, parcel fencing, overhead utility poles, and highway signage.

A new roadway from Melody Road (west of SR-94) to the JIV Tribal Lands would be constructed under the Melody Road Access Alignment. To access this new road, improvements further west on Melody Road would be required. Adjacent frontage along Melody was described previously. Frontage located further west along Melody Road includes undeveloped grasslands, a paved private drive, County road intersection, street/directional signage, fire hydrant, parcel fencing, street light, utility box, and stormwater drainage. The 87-acre parcel between Melody Road and the JIV Tribal Lands consist of grasslands and riparian/oak woodland, which is regulated under the San Diego County MSCP, and is classified as Hardline Preserve, Pre-Approved Mitigation, and Take-Authorized Areas. No existing developments exist on the 87-acre parcel.

Future Land Use

The Proposed Project site is broken up into six different sites, five of which comprise the Non-Access Road Intersections and one comprising the Access Road Alignment sites. Beginning in the northwest and traveling southeast through the Non-Access Road Intersections, the first Proposed Project intersection is SR-94/Jamacha Boulevard.

State Route 94/Jamacha Boulevard Intersection: Future land development northwest and southwest of the SR-94/Jamacha Boulevard intersection would be limited due to the existing Open Space/Conservation land use designation in the San Diego County General Plan.

State Route 94/Jamacha Road Intersection: Vacant land available for future development around the SR-94/Jamacha Road intersection is limited. The only vacant land near the intersection is the drainage channel southwest of the intersection. This undeveloped area is designated as Public/Semi-Public per the County General Plan and Valle de Oro Community Plan; however, the existing channel and potential impacts to waters of the U.S. would limit future land development at this location. Future development surrounding this intersection would most likely be the result of redevelopment or infill of existing developed parcels.

State Route 94/Steele Canyon Road Intersection: No vacant parcels exist surrounding the length of the intersection Proposed Project limits. Future development surrounding this intersection would most likely be the result of redevelopment or infill of existing developed parcels.

State Route 94/Lyons Valley Road Intersection: No vacant parcels exist adjacent to the intersection, so future development would be the result of redevelopment or infill development.

State Route 94/Maxfield Road Intersection: Underdeveloped parcels on the east side of SR-94 could potentially be developed in the future with Semi-Rural Residential uses, as well as Rural Commercial uses on a parcel currently developed with a residential facility located at the northwestern end of the Proposed Project limits.

Access Road Alignments: The improvements for the Access Road Alignments extend from an area north of Melody Road to an area south of the JIV Tribal Lands. Immediately north of Melody/Peaceful Valley Ranch Road, vacant Semi-Rural Residential designated land exists on the east and west side of SR-94. Future development north of Melody Road could include Semi-Rural Residential uses on these vacant residentially designated parcels.

South of Melody/Peaceful Valley Ranch Road, future land uses could consist of residential/equestrian uses east of SR-94 in the Peaceful Valley Ranch development recently approved by San Diego County. Future urban opportunities west of SR-94 are limited due to the Otay Ranch Specific Plan and MSCP preservation designations for this currently vacant land. The four-acre parcel located northwest of SR-94/Reservation Road is designated Semi-Rural Residential; however, the future use is expected to remain an access road parcel for the JIV Tribal Lands.

Future use on the JIV includes the gaming facility, currently being developed. Land south of the JIV is not expected to see future development due to the RJER (west of SR-94) and HCWA (east of SR-94) owned and operated by CDFW. This land south of the JIV Tribal Lands has a General Plan land use designation of Open Space Conservation, which would confirm its future open space/conservation status.

There are fifteen potential future development Proposed Projects shown around the Proposed Project limits as shown in **Table 2.1-1.** Future land use in the surrounding area consists primarily of estate and residential homes. Additional equestrian use is also proposed, as is the JIV gaming facility currently being developed. Two road improvements are also listed: (1) improvement of Proctor Valley Road from a dirt road to a 2-lane light collector from Chula Vista City limits to SR-94 and (2) the realignment of Otay Lakes Road with the intersection of Honey Springs Road.

TABLE 2.1-1
POTENTIAL FUTURE DEVELOPMENT PROJECTS

Name	Jurisdiction	Proposed Uses	Status
Jamul Indian Village Gaming Project	San Diego County	A 203,000 square feet gaming facility on 6.2 acres of tribal land held in trust by the United States for the benefit of the JIV.	Approved and under construction.
Morgan Minor Subdivision	San Diego County	Two single-family estate homes proposed to the north of the Procter Valley Road/Poplar Meadow Lane intersection.	Pending
Hendrix Subdivision	San Diego County	Five single-family estate homes proposed east of SR-94 (Campo Road) on Las Palmas Road.	Pending
Mintz Subdivision	San Diego County	Ten single-family estate homes proposed north of Skyline Truck Trail and east of Hidden Trail Drive.	Pending
Jamul Highlands Subdivision	San Diego County	Twenty-five single-family estate homes proposed south of the Lyons Valley Road/Jamul Highlands Road intersection.	Pending
TPM 20626	San Diego County	Three single-family estate homes proposed on the west side of Proctor Valley Road, north of the Proctor Valley Road/Melody Road intersection.	Pending
Yacoo Minor Subdivision	San Diego County	Four single-family estate homes proposed on Steele Canyon Road north of Proctor Valley Road.	Pending
Residential Subdivision	San Diego County	Twenty single-family estate homes proposed east of the JIV Tribal Lands and south of Olive Vista Drive.	Pending
Blanco Parcel Map	San Diego County	Four single-family estate homes proposed on the east side of SR-94, north of Melody Road.	Pending
Stein Barth Minor Subdivision	San Diego County	Two single-family estate homes proposed north of the JIV Tribal Lands and south of Olive Vista Drive.	Pending
Pioneer Minor Subdivision	San Diego County	Three single-family estate homes proposed west of the JIV Tribal Lands and north of Melody Lane.	Pending
Otay Ranch-Village 19	San Diego County	Twenty single-family estate homes proposed south-west of the JIV Tribal Lands and south of Melody Lane.	Pending
Jamul Estates II	San Diego County	Maximum allowable developable lots are 68 single-family estate homes located just north-east of the JIV Tribal Lands.	Pending
Simpson Farms	San Diego County	Ninety-eight single-family estate homes and 115,000 square feet of commercial uses generally located on the northeast corner of the SR-94/Jefferson Road intersection.	Pending
Peaceful Valley Ranch	San Diego County	Project proposes the subdivision of 181.31acres for an estate residential development, 46 new estate residential lots, a 6.7-acres equestrian facility and a new joint-use fire and administration offices for the SDRFD and the USFWS. The project is located east of SR-94 and would use the intersection of SR-94 and Melody Road as a single access point.	Approved

2.1.2 Consistency with State, Regional, and Local Plans and Programs

Improvements for the State highway system are guided by the Regional Transportation Plan (RTP) and Regional Transportation Improvement Plan (RTIP). Land use development on land outside the existing State highway ROW is guided by the San Diego County General Plan, Valle de Oro Community Plan and Jamul/Dulzura Subregional Plan, all of which were updated and adopted in August 2011. The San Diego County Multiple Species Conservation Plan: South

County Subarea Plan applies to certain portions of land outside the Caltrans ROW but within the Proposed Project limits. The Land Management Plan for the Rancho Jamul Ecological Reserve (approved July 2010) guides management, maintenance and restoration activities on the RJER, which is located south of the JIV Tribal Lands. Right-of-way expansion for several of the Alternatives, south of the JIV Tribal Lands, encroaches onto the RJER. Each of the plans identified above are summarized below.

Affected Environment

Regional Transportation Plan

The San Diego Association of Governments' (SANDAG) 2050 RTP is a plan for the regional transportation system that builds on the current transportation system by outlining Proposed Projects and funding for transit, rail and bus services, express or managed lanes, highways, local streets, bicycling and walking.

The applicable 2050 RTP Goals are as follows:

- Mobility: the transportation system should provide the general public and those who move goods with convenient travel options. The system should operate in a way that maximizes productivity. It should reduce the time it takes to travel and the cost associated with travel.

- Reliability: the transportation system should be reliable. Travelers should expect relatively consistent travel times, from day to day, for the same trip and mode of transportation.

- System Preservation and Safety: the transportation system should be well maintained to protect the public investment in transportation. It also is critical to ensure a safe regional transportation system.

- Healthy Environment: the transportation system should promote environmental sustainability and foster efficient development patterns that optimize travel, housing, and employment choices. The system should encourage growth away from rural areas and closer to existing and planned development.

The 2050 RTP shows the segment of SR-94 from Avocado Boulevard to Jamacha Road widened from a 4-lane to a 6-lane conventional highway and the segment from Jamacha Road to Steele Canyon Road widened to a 4-lane conventional highway in the revenue constrained plan, in 2050. In the 2050 RTP's unconstrained scenario, the segment of SR-94 from Jamacha Road to Steele Canyon Road is planned for widening to a 6-lane conventional highway, while the

segment from Steele Canyon Road to Melody Road is planned for widening from a 2-lane to a 4-lane conventional highway by the year 2050.

Regional Transportation Improvement Program

SANDAG is required by state and federal laws to develop and adopt an RTIP, which is a multi-year program of proposed projects for major highway, arterial, transit, and bikeway projects. Any transportation projects funded with federal, state or local monies must be included in an approved RTIP. The RTIP covers five fiscal years and incrementally implements the 2050 RTP.

At its meeting on September 28, 2012, the SANDAG Board of Directors adopted the final 2012 RTIP. The 2012 RTIP received federal approval on December 14, 2012. SANDAG developed and adopted the 2014 RTIP on September 26, 2014, which updated the 2012 RTIP to cover fiscal years 2015 through 2019. All regionally significant and/or capacity increasing transportation projects are required to be included in the RTIP. In addition, all projects included in the 2014 RTIP must be consistent with the 2050 RTP. Federal approval of the 2014 RTIP was received on December 15, 2014.

San Diego County General Plan

The County Board of Supervisors voted on August 3, 2011 to approve a new County General Plan, which represents the first large scale update of the General Plan in approximately 30 years. The General Plan directs future growth in the unincorporated areas of the County with a projected capacity to accommodate more than 232,300 homes (San Diego County, 2011a). The General Plan document reduces housing capacity by 15 percent and shifts 20 percent of future growth from the eastern backcountry areas to the western communities. The elements of the General Plan include Vision and Guiding Principles, Land Use Element, Mobility Element, Conservation and Open Space Element, Housing Element, Safety Element, Noise Element, and Implementation.

The Land Use Element designates the general location and intensity of housing, business, industry, open space, education, public buildings and grounds, waste disposal facilities and other land uses. This element of the General Plan states that Community Plans, such as the Valle de Oro Community Plan and Jamul/Dulzura Subregional Plan (at times referred to as a "Community Plan"), define Goals & Policies to provide more precise guidance regarding the character, land uses, and densities. Given that goals & policies of the Valle de Oro Community Plan and Jamul/Dulzura Subregional Plan provide more precise guidance than the General Plan, the discussion of Land Use Goals and objectives will be provided below.

Valle de Oro Community Plan

The Valle de Oro Community Plan encompasses the Project limits for two of the Non Access Road intersection components of the Proposed Project: SR-94/Jamacha Boulevard and SR-94/Jamacha Road. The Valle de Oro Community Plan was originally adopted in 1977 to guide development in the unincorporated areas of Casa de Oro, Mount Helix, Vista Grande Hills and Rancho San Diego. The Community Plan, which also was amended in August 2011, has the following vision statement:

> The unique balance of urban, semi-rural, agricultural, and open space land uses shall be retained. The green-belt separation from adjacent cities and planning areas shall be preserved. New development will conserve natural resources and topography and will provide a pleasant, safe environment for present and future residents of Valle de Oro.

The main sections of the Valle de Oro Community Plan include: community character, land use, housing, mobility, public services, conservation, recreation, scenic highways, energy, public safety and noise.

The applicable Valle de Oro Community Plan Goals can be found below:

- Community Character: Retain the unique balance of urban, semi-rural agricultural and open space land uses within the community, with open space and low density buffers that separate the community from adjacent cities and unincorporated communities, while new development within the community conserves natural resources and topography.

- Open Space: The preservation of open space including sensitive habitat, steep slopes, canyons, floodplains, and agricultural lands; and regulation of the use of open space within the community.

- Mobility: Provide a balanced, coordinated transportation system which will provide safe, efficient circulation within and through the community that will effectively connect Valle de Oro to neighboring communities, and which will complement existing and future land use patterns.

- Conservation: Promote conservation and planned management of all valuable resources, natural and man-made, and prevent wasteful exploitation and destruction of the resources.

- Scenic Highways: Utilize scenic highway corridors as one method of protecting and enhancing the appearance of scenic, historical, and recreational areas.

- Public Safety: Develop and maintain plans and programs to assure the health, safety, and well-being of the residents of the Valle de Oro community.

- Noise: Protect and enhance Valle de Oro's acoustical environment by supporting the control of noise at its source, along its transmission path, and at the site of sensitive receptors.

Jamul/Dulzura Subregional Plan

The Jamul/Dulzura Subregional Plan encompasses the Access Road Project limits and three Non-Accress Road Intersection Project limits. The Jamul/Dulzura Subregional Plan was initially adopted in 1979 to guide development in the unincorporated areas of Jamul and other rural communities in the region, including Steele Canyon, Dulzura, and Barrett Junction. The Subregional Plan was most recently amended in August 2011, and continues to have the Goal of encouraging development in such a manner as to retain the rural atmosphere of the community. The updated Jamul/Dulzura Subregional Plan contains six main sections, as well as an appendix that identifies Resource Conservation Areas. The main sections of the Subregional Plan address land use, mobility, recreation, conservation, scenic highway and plan implementation.

The relevant Jamul/Dulzura Subregional Plan Goals can be found below:

- Land Use: Development of the land in such a manner as to retain the rural densities and land uses of the community.

- Mobility: Develop a transportation system that provides for safe, efficient travel throughout this rural community and preserves the beauty, quality, and rural character of the Jamul/Dulzura Subregional Planning area. Automobile and non-motorized modes of travel are accommodated within the planning area. A local road system that is safe and efficient.

- Conservation: Environmental resources in the Jamul/Dulzura area that are carefully managed to maintain them for future needs.

- Scenic Highways: The designation of a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area.

<u>San Diego County Multiple Species Conservation Plan (MSCP)</u>

In 1997, the San Diego County adopted the MSCP Subarea Plan as part of a larger Natural Communities Conservation Program to provide long-term habitat conservation for a variety of sensitive habitats and species. The Access Road Alignments are located at the junction of two different planning segments: the Metropolitan-Lakeside-Jamul (MLJ) segment, and the South

County Segment Preserve Areas and Developable Areas (South County Segment). The Non-Access Road Intersection limits all fall within the MLJ segment. Portions of the limits for the Access Road Alignments fall within the MLJ segment, with the remainder in the South County Segment, as discussed in more detail below.

The MSCP designated areas are regulated under the authority of San Diego County in cooperation with the CDFW and the USFWS. Specific mitigation requirements for individual projects are required to be consistent with the mitigation requirements set forth in the MSCP and the applicable Subarea Plan. The mitigation ratios included in the Subarea Plan are identical to the mitigation ratios in San Diego County's Biological Mitigation Ordinance (BMO). The BMO contains design and mitigation requirement guidelines for projects subject to County discretionary authority. These BMO guidelines state that projects proposed within the MLJ Segment will avoid sensitive biological resources (as defined in the BMO) to the maximum extent practicable through siting the project in less sensitive areas, reducing road standards, and developing on steeper slopes (to avoid sensitive habitats). Projects should be designed so that they do not significantly contribute to edge effects or affect established wildlife movement corridors.

Mitigation ratios are higher for areas that are designated in Subarea Plan as Biological Resource Core Areas (areas ranked moderate or high in the County's Habitat Evaluation Model). Within the Access Road and the Non-Access Road Intersection limits, only one area is designated a Biological Resource Core Area: a portion of the Access Road Alignment south of Melody Road and west of SR-94 (on the 87-acre parcel). Regulations associated with the different MSCP designations occurring within the Proposed Project limits are summarized below.

MLJ Segment

Portions of the Access Road Alignment limits located east of SR-94, and north of Melody Road, are in the MLJ Segment. All Non-Access Road Intersections limits are located within the MLJ Segment. Portions of some of these Proposed Project limits areas are designated "Minor Amendment Areas" (meaning that a Minor Amendment to the MSCP is required from the County before development may occur). Other areas are designated "Take-Authorized Areas" (meaning that the take of covered species and their habitats is authorized for projects that meet BMO requirements and comply with the terms of the Subarea Plan).

South County Segment

Portions of the Access Road Alignments limits located west of SR-94, and south of Melody Road, are in the South County Segment, which is divided into two designations: (1) Take-Authorized Areas; and (2) Multiple Habitat Planning Areas (MHPAs). Within Take-Authorized Areas, projects must conform to the BMO and the Subarea Plan. Land uses within the MHPAs are generally very limited. Some examples of land uses that may be authorized within the

MHPAs include: hand clearing of vegetation for fuel management, habitat restoration, noxious weed control, scientific studies, and recreational trails.

Habitat- and Species-Based Mitigation

The BMO identifies measures to ensure that a project properly mitigates potential effects to both covered species and their habitats. These measures include identifying mitigation sites based on their value to covered species (based on data within the MSCP and BMO), avoiding known populations, avoiding special habitats (such as vernal pools), and determining appropriate mitigation ratios and grading restrictions.

Land Management Plan (LMP) for the Rancho Jamul Ecological Reserve

This LMP was prepared to guide CDFW in the management, maintenance and restoration of the biological diversity and ecosystem components currently and historically present within the RJER.

The RJER is located in southwestern San Diego County between the communities of Jamul and Dulzura, approximately 26 miles east-southeast from downtown San Diego. The RJER borders on SR-94 for approximately four miles along the northeastern edge of the property. The JIV Tribal Lands and adjacent 87-acre parcel represent the northern boundary of the RJER, while Otay Lakes Road is located just north of the southern border of the property.

The primary purpose for the establishment of the RJER is to:

- provide long-term protection for biological resources,
- offer "sensible and compatible" wildlife-dependent recreational and educational opportunities for the public,
- offer opportunities for research and scientific study, and
- provide protection for important historical and cultural resources, such as the homestead site of Pio Pico, the last Mexican governor.

The purchase of the land was a 5-year coordinated effort between the State and others to preserve a significant block of land within the MLJ segment of the San Diego County County MSCP Subarea Plan. The State identifies the purchase of the RJER as a component that helps protect valuable biological resources in the MSCP.

The primary public entrance to RJER is accessed from SR-94 approximately two-miles south of the Rural Fire Station on the west side of the road. Public access to the RJER is by special permit only and public uses are limited to managed hunting, scientific research, and limited equestrian rides. Educational groups also are allowed by special arrangement. According to the LMP, the RJER is otherwise closed to the public (Resources Agency, 2010). RJER contains a

network of old ranch roads, some of which are used by CDFW management, law enforcement, access to research sites, and by Fire Agencies and Border Patrol staff. Segments of roads that do not travel through sensitive areas also serve as a trail network for hunters and equestrians using the area under permit.

According to the adopted LMP, the purpose of this LMP is to establish a set of management Goals and objectives that are compatible with ecological reserve management principles. The LMP serves as a guidance document that ensures the long-term protection of wildlife and their habitats and allow for compatible public uses.

Land Management Plan (LMP) for the Hollenbeck Canyon Wildlife Area

This LMP was prepared to guide CDFW in the management, maintenance and restoration of the biological diversity and ecosystem components currently and historically present within the HCWA (Resources Agency, 2008). The 5,189-acre HCWA is located in south-central San Diego County between the communities of Jamul and Dulzura, approximately 26 miles east-southeast from downtown San Diego. State Route 94 is the western border of the HCWA for most of the length of the wildlife area, and the JIV Tribal Lands and adjacent 87-acre parcel are located across SR-94 from the northwest corner of the HCWA.

The primary purpose for the establishment of the HCWA is to "provide compatible wildlife dependent recreation and to conserve, restore, and protect declining sensitive species and their associated habitats" (Resources Agency, 2008). Acquisition of HCWA ensured preservation of a large portion of an established north-south wildlife corridor along the entirety of Hollenbeck Canyon into Lyons Valley. Completing the acquisitions that formed HCWA ensured a functional connection to the RJER immediately to the west, and the Bureau of Land Management's Otay Mountain Wildlife Management Area and Wilderness Area immediately to the south. HCWA fits into a larger, relatively intact habitat mosaic and was identified by the MSCP as a high-priority acquisition for linking and conserving contiguous habitat.

The primary public entrance to HCWA is accessed from SR-94 via Honey Springs Road, which is near the intersection of Otay Lakes Road and SR-94. Public access to the HCWA is free and is for day-use only, and public uses are limited to hiking, wildlife observation, scientific research, and managed hunting. HCWA contains a network of old ranch roads, some of which are used by CDFW management, law enforcement, access to research sites, and by Fire Agencies and Border Patrol staff. Segments of roads not traveling through sensitive areas also serve as a trail network used by hikers using the area and hunters under permit.

According to the adopted LMP, the purpose of this LMP is to establish a set of management Goals and objectives that are compatible with wildlife area management principals. The LMP defines appropriate natural and cultural resource management tasks and public uses on the property while maximizing the public's enjoyment of the wildlife area.

Comprehensive Conservation Plan (CCP) for the San Diego National Wildlife Refuge (NWR)

The San Diego National Wildlife Refuge was established in 1996, currently contains approximately 11,530 acres, and is managed by the USFWS. The NWR stretches from Jamul to communities in Spring Valley and eastern Chula Vista. In 1997, the USFWS approved a Land Protection Plan (LPP) and acquisition boundary that has the potential to protect up to 43,860 acres of native habitat (**Figure 2.1-2**). For descriptive purposes, the USFWS divides the Otay-Sweetwater Unit into five management areas: (1) McGinty Mountain, (2) Sweetwater River, (3) Las Montañas, (4) San Miguel Mountain, and (5) Otay Mesa and Lakes.

According to the USFWS website, the refuge is "…the USFWS contribution to the MSCP, a landscape-wide habitat conservation plan to preserve habitat and species while allowing appropriate development. The refuge actively restores habitats degraded by prior agricultural uses and wildfire; restoration strategies are guided by ongoing biological surveys and species monitoring programs." The Refuge protects a variety of native upland and wetland habitats, and plays a critical role in the regional effort to maintain the high biological diversity of southwestern San Diego County. More than 16 species currently listed as threatened or endangered under the Federal ESA and/or the CESA are either known to occur on the NWR or have occurred here within the last 20 years. Many other species of concern, including at least 35 species covered by the MSCP have also been documented on the Refuge.

The goals for the San Diego NWR include:

Goal 1: Protect, manage, and, where appropriate, enhance or restore habitat to support the recovery of the federally and State listed endangered and threatened species and other species of concern currently or historically present on the Refuge.

Goal 2: Protect, manage, and restore the Refuge's native habitats, MSCP-covered species, and other species of concern for their inherent value and to contribute to the regional effort of conserving the biological diversity of southwestern San Diego County.

Goal 3: Engage in partnerships and provide leadership in coordinating land management and acquisition efforts throughout southwestern San Diego County in support of the MSCP and other resource protection objectives developed for the Region.

Goal 4: Provide safe and high-quality opportunities for compatible wildlife-dependent recreational uses that foster public appreciation of the unique natural heritage of the San Diego region.

The USFWS has prepared a draft CCP to guide management of the NWR over the next 15 years. Currently, the draft CCP is undergoing environmental review to comply with the National Environmental Policy Act (NEPA). Currently, there is no overarching management plan in place for the San Diego NWR. The Conceptual Management Plan for the San Diego National Wildlife Refuge provides a broad overview of the Service's proposed approach for managing Refuge resources and operations, while the MSCP Plan provides general guidance for habitat and species management and monitoring within the larger MSCP preserve.

2.1.2.1 Environmental Consequences

Consistency with State, Regional, and Local Plans and Programs

The Non-Access Road Intersections and Access Road consistency with State, Regional and Local Plans and Programs is presented below. **Table 2.1-2**, which is provided at the end of Section 2.1.2.1, presents consistency/inconsistency conclusions with summary statements for each Plan/Program addressed.

Non-Access Road Intersections

Consistency with 2050 RTP/RTIP

The proposed improvements at the Non-Access Road Intersections would be consistent with the stated Goals of the 2050 RTP. The operating efficiencies resulting from the proposed Non-Access Road Intersections would be consistent with the Mobility and Reliability Goals of reducing the time it takes to travel and providing relatively consistent travel time through this area. The improvements would also be consistent with the System Preservation and Safety Goal given that all improvements would be designed and built consistent with Caltrans' design manual, and maintained by Caltrans (within State ROW).

The proposed Non-Access Road Intersections would be consistent with the Healthy Environment Goal as they are proposed for an existing roadway and are located primarily within the existing roadway ROW. Of the intersections that require additional ROW (SR-94/Jamacha Road, SR-94/Steele Canyon, SR-94/Lyons Valley Road and SR-94/Maxfield Road), SR-94/Lyons Valley Road and SR-94/Maxfield Road are the only intersections that would affect natural communities. The additional ROW needed at SR-94/Lyons Valley Road would result in an impact to 0.1-acres of southern coast oak riparian habitat (see Section 2.16 Natural Communities). The impact would be mitigated by preserving riparian habitat or purchasing mitigation credits in compliance with the BMO. The additional ROW needed at SR-94/Maxfield Road would result in an impact to 0.69-acres of Diegan coastal sage scrub (see Section 2.16 Natural Communities). Mitigation for the impact at the SR-94/Maxfield Road intersection includes revegetating the cut-and-fill slopes with native vegetation to be maintained for at least 3 years.

With the exception of the SR-94/Jamacha Road intersection improvements, the Non-Access Road Intersections would not impact jurisdictional waters (see Section 2.17 Wetlands and Other Waters) or threatened/endangered species (see Section 2.20 Threatened and Endangered Species). The proposed improvements at the SR-94/Jamacha Road intersection would result in three square feet of permanent impacts to jurisdictional waters (see Section 2.17 Wetlands and Other Waters). This impact results from the use of concrete footers for the retaining wall (see Section 1.4.1 Common Design Features of the Alternatives 1-3: Build Alternatives). Implementation of Water Resources Avoidance, Minimization and/or Mitigation Measures listed in Section 2.17.4 (e.g., land preservation/restoration plan, obtaining permits from USACE, SWRCB and CDFG) would ensure that impacts to wetlands are less-than-significant with mitigation. Implementation of Threatened and Endangered Species avoidance, minimization and/or mitigation measures (e.g., pre-construction survey surveys, consultation with USFWS and CDFG, and use of a monitoring biologist) listed in Section 2.20.4 would ensure that impacts to Threatened and Endangered Species are less-than-significant. With these mitigation measures, even the SR-94/Jamacha Road intersection improvements would be consistent with the Healthy Environment Goal.

In addition, proposed improvements for the Non-Access Road Intersections would not create a transportation system that would affect housing and employment patterns, given that these patterns are in place around the intersection. Lastly, the improvements do not affect growth as they are designed to mitigate traffic associated with the JIV Gaming Facility, which is currently under construction.

Consistency with Applicable General/Community/Subregional Plans

The proposed improvements are consistent with the stated Plan Goals under Affected Environment. Goals of the Valle de Oro Community Plan apply to the SR-94/Jamacha Boulevard and SR-94/Jamacha Road intersections, while the Goals of the Jamul/Dulzura Subregional Plan apply to the SR-94/Steele Canyon Road, SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections.

Valle de Oro Community Plan: The Proposed Project features at the SR-94/Jamacha Boulevard intersection would affect an existing paved intersection; therefore, the improvements would be consistent with the Valle de Oro Community Character Goal of conserving natural resources and topography, as well as the Open Space and Conservation Goals of preserving open space and promoting conservation of valuable resources within the community. Although the Proposed Project features at the SR-94/Jamacha Road intersection extend beyond the existing Caltrans ROW, the Proposed Project features would not significantly impact natural resources or natural topography. As mentioned previously, three square feet of permanent impact to jurisdictional waters would occur due to the proposed location of the concrete footings of the retaining wall. The impact to jurisdictional waters does not result in a significant floodplain/hydrology impact

as discussed in Section 2.8. As described in Section 2.16, no impact to natural communities would exist at this location. The topographic change that would occur on the south-side of SR-94 would be to a man-made slope previously constructed to accommodate SR-94. This slope would be reconstructed to accommodate an additional right-turn lane. Accordingly, the proposed improvements at the SR-94/Jamacha Road intersection would be consistent with the Community Character, Open Space and Conservation Goals of the Valle de Oro Community Plan.

The Proposed Project features would improve operational efficiencies of the two intersections, which would also be consistent with the Mobility and Public Safety Goals of providing a safe, efficient circulation within and through the community.

The Proposed Project features would also be consistent with the Scenic Highway and Noise Goals of the Valle de Oro Community Plan. As noted in Visual Resources/Aesthetics (Section 2.6) and Noise (Section 2.14), the proposed features at these two intersections would not result in a significant visual impact, nor would they increase long-term noise. The restriping of Jamacha Boulevard would not detract from the scenic values or increase long-term noise given that roadway striping and vehicle use currently exist at this location. The SR-94/Jamacha Road intersection is surrounded by commercial and public land uses, which do not contribute to natural scenic values along SR-94. The proposed modifications to this intersection would not detract from the scenic values of SR-94. According to Section 2.14 Noise, the proposed improvements would not result in a substantial noise increase at any receivers and traffic noise levels would not approach or exceed the noise abatement criteria at any receiver.

Jamul/Dulzura Subregional Plan: With the possible exception of the SR-94/Lyons Valley Road and SR-94/Steele Canyon Road intersections, the Proposed Project features would be consistent with the Jamul/Dulzura Subregional Plan's Land Use Goal. The proposed features at the SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections would improve existing operations without disrupting rural densities and land uses of the community. The additional ROW needed for Proposed Project features at the SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections would not affect the rural densities, nor would structures be impacted because the additional ROW would be acquired from uninhabited/undeveloped grassland and riparian woodland.

The development of a second through-lane on the south side of SR-94 at the SR-94/Steele Canyon Road intersection would reduce the number of retail parking spaces for the adjacent commercial uses. There currently are a total of 57 regular spaces and 2 handicapped spaces at the Steele Canyon businesses. Of the 59 total spaces, 5 surface parking spaces front SR-94 and 22 diagonal parking spaces front the local retail establishments. The 5 spaces fronting SR-94 are within the existing Caltrans ROW. A parking occupancy study conducted for the Proposed Project revealed the highest use of parking spaces occurred at 5pm on Saturday with 39 of the 59 spaces (67%) being occupied. The highest use on Sunday was 4pm with 36 of the 59 spaces

(61%) being occupied. Both Thursday and Friday had lower peak occupancy rates than either Saturday or Sunday. San Diego County code requires 34 total spaces based on existing building square footage, while 39 spaces would be required based on existing occupancy limits of current businesses.

A total of 23 parking spaces (39%) would be removed to accommodate the additional ROW needed for the SR-94/Steele Canyon Road intersection features. These spaces consist of: (1) 8 spaces in front of the fruit market and adjacent building, (2) 10 head-in spaces, and (3) 5 parallel spaces in front of the Greek restaurant on the south side. The remaining 36 spaces would meet County Code post construction for square footage requirement.

The proposed improvements at the SR-94/Steele Canyon Road, SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections would also be consistent with the Jamul/Dulzura Subregional Plan Mobility Goal. The proposed improvements would be constructed to be consistent with both the Caltrans and County standards, which would ensure the establishment of safe, efficient improvements. The proposed roadway improvements, construction of a new signal that includes pedestrian signal heads and push buttons based on current ADA requirements (SR-94/Lyons Valley Road intersection) and bus stop improvements are consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.

The Proposed Project features at the SR-94/Steele Canyon Road, SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections would similarly be consistent with the Jamul/Dulzura Subregional Plan Conservation Goal. Environmental resources around the SR-94/Steele Canyon Road intersection would not be significantly impacted. No impacts to natural communities (Section 2.16 Natural Communities), jurisdictional waters (Section 2.17 Wetlands and Other Waters) or threatened/endangered species (Section 2.20 Threatened and Endangered Species) would occur with construction at this intersection. Proposed bioswales would be constructed to slow runoff and promote infiltration for stormwater at all three intersections.

The additional ROW impacts required at the SR-94/Maxfield Road intersection would result in an impact to approximately 0.69-acres of Diegan coastal sage scrub (Section 2.16 Natural Communities). Mitigation for this impact includes revegetating the cut-and-fill slopes with native vegetation to be maintained for at least 3-years (see Section 2.16.3 Natural Community Avoidance, Minimization and/or Mitigation Measures). Impacts to natural communities (Section 2.16 Natural Communities), would occur at the SR-94/Lyons Valley Road intersection where tree and/or brush removal would disturb 0.1 acre of southern coast live oak riparian habitat. Implementation of natural communities mitigation measures (e.g., preserving riparian habitat or purchasing mitigation credits in compliance with the BMO) listed in Section 2.16.3 would ensure that impacts to natural communities are less than significant.

The proposed improvements for SR-94/Lyons Valley Road and SR-94/Maxfield Road would be consistent with the Jamul/Dulzura Subregional Plan Conservation Goal following implementation of the mitigation stated above. Lastly, no impacts to jurisdictional waters (Section 2.17 Wetlands and Other Waters) or threatened/endangered species (Section 2.20 Threatened and Endangered Species) would occur at the SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections.

The proposed improvements for the SR-94/Steele Canyon Road, SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections would also be consistent with the Jamul/Dulzura Subregional Plan *Scenic Highway Goal*. Please see Section 2.1.1 for a detailed discussion of the existing land uses surrounding these intersections. The visual resource analysis (Section 2.6 Visual Resources) conducted for the intersections concluded that the change to the existing visual character for SR-94/Steele Canyon Road and SR-94/Lyons Valley Road would create increases in urban features, yet would be contextual with the roadway corridor. The proposed change to existing visual resources and response would result in a less-than-significant visual resource impact at these two intersections; therefore, the Proposed Project features would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area.

The visual resource analysis conducted for the SR-94/Maxfield Road intersection concluded that the proposed improvements for this intersection would result in a greater expanse of paving and graded slopes, resulting in the permanent loss of landscape. The change to existing visual character/quality would be moderate, while viewer response would likewise be moderate; however, this change would not result in a significant visual resource impact because the proposed improvements at the SR-94/Maxfield Road intersection would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area (see Section 2.6.3 Visual Resources/Aesthetics Environmental Consequences).

MSCP Consistency

Since compensatory mitigation for any natural habitat disturbance/loss would be performed as specified in the MSCP and BMO, and as presented in Section 2.16.3 Natural Communities Avoidance, Minimization and/or Mitigation Measures, there would be no impact to the Goals of the MSCP. Accordingly, the proposed Non-Access Road Intersection features would, therefore, be consistent with the Goals of the MSCP.

The proposed SR-94/Jamacha Boulevard features are located within Caltrans' ROW, which is not subject to the MSCP. The features at this intersection consist of restriping and traffic signal modifications. Since there would be no natural habitat disturbance outside of Caltrans' ROW, there would be no impact to the Goals of the MSCP.

A small portion of the Proposed Project features for the other intersections (SR-94/Jamacha Road, SR-94/Lyons Valley Road, SR-94/Steele Canyon Road, and SR-94/Maxfield Road) is located within the MLJ Segment of the MSCP. The majority of the Proposed Project area is in Caltrans' ROW, which is not subject to the MSCP.

The area surrounding the Jamacha channel at the SR-94/Jamacha Road intersection is owned by the County; County-owned lands are not subject to the MSCP. Proposed Project features would occur primarily on lands that are paved, landscaped, or barren. However, a small portion of Jamacha channel would be affected by the installation of a retaining wall: approximately 3 square feet of permanent impacts and 1,369 square feet of temporary construction impacts.

Proposed Project features at the SR-94/Lyons Valley Road intersection would include tree and/or brush removal on 0.1 acre of southern coast live oak riparian habitat that is not within the existing Caltrans' ROW. Since compensatory mitigation for this natural habitat disturbance will be performed as specified in the MSCP and BMO, there would be no impact and this Proposed Project feature is consistent with the goals of the MSCP.

Proposed Project features at the SR-94/Steele Canyon Road intersection would occur only on lands that are paved, landscaped, or barren. Since there would be no natural habitat disturbance, there would be no impact to the Goals of the MSCP. This Proposed Project feature is consistent with the Goals of the MSCP.

Proposed Project improvements at the SR-94/Maxfield Road intersection would occur primarily on lands that are paved, landscaped, or barren. However, at this intersection, construction would impact approximately 0.69-acres of Diegan coastal sage scrub. Since compensatory mitigation for this natural habitat disturbance/loss will be performed as specified in the MSCP and BMO, there would be no resultant impact and this Proposed Project feature is consistent with the Goals of the MSCP.

Land Management Plan (LMP) for the Rancho Jamul Ecological Reserve

The Non-Access Road Intersection improvements would have no impact on the RJER given that they are not adjacent to or within the RJER, nor do they require any additional ROW from the RJER. Thus, improvements proposed for the Non-Access Road Intersections would not impede the State's plan for management, maintenance and restoration of the RJER.

Land Management Plan (LMP) for the Hollenbeck Canyon Wildlife Area

The Non-Access Road Intersection improvements would have no impact on the HCWA given that they are not adjacent to or within the HCWA, nor do they require any additional ROW from the HCWA. Accordingly, improvements proposed for the Non-Access Road Intersections would not impede the State's plan for management, maintenance and restoration of the HCWA.

Comprehensive Conservation Plan (CCP) for the San Diego National Wildlife Refuge (NWR)

The Non-Access Road Intersection improvements would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR. Accordingly, improvements proposed for the Non-Access Road Intersections would not impede the USFWS plan for management, maintenance and restoration of the NWR.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Consistency with 2050 RTP/RTIP

The segment of SR-94 from Steele Canyon Road to Melody Road is to be widened to a 4-lane conventional highway under the Unconstrained Scenario of the RTP. The proposed SR-94 Proposed Project features would constitute operational, rather than capacity improvements, to ensure proper operating conditions at the two intersections within the Access Road Alignment.

South of Melody Road, both the Revenue Constrained and Unconstrained Scenarios of the RTP identify SR-94 as a 2-lane conventional highway. SR-94 would contain one through-lane in each direction south of Melody Road, which is consistent with the RTP. Project features (i.e., turning lanes) would also be provided to ensure adequate traffic operations. The operational improvements would not make the proposed improvements south of Melody Road inconsistent with the RTP.

The proposed improvements would also be consistent with the 2050 RTP's Mobility and Reliability Goals of reducing the time it takes to travel and providing relatively consistent travel time through this area. The improvements would also be consistent with the System Preservation and Safety Goal given that all improvements would be designed and built consistent with Caltrans' standards, and maintained by Caltrans.

The Reservation Road and Daisy Drive (Options 1-3) Access Road Alignments would be consistent with the Healthy Environment Goal of promoting environmental sustainability. These Access Road Alignments include the use of bioswales, which help promote environmental sustainability by filtering the first-flush from surface runoff and encouraging infiltration. The development of new transit stops, crosswalks and traffic signal construction/modifications, including upgrades to pedestrian signal-heads and push-buttons based on the current ADA requirements, encourages the use of alternative transportation that assists in reducing dependency on gasoline within single-occupant vehicles. Lastly, each Access Road Alignment proposes retaining walls at key locations limiting the amount of hillside grading required for the improvement footprint. While the Melody Road Access Alignment would use bioswales,

provide transit stops, crosswalks and signal improvements as stated above, it would also result in the construction of a new and separate roadway from the highway where none currently exists. This results in the elimination of more natural habitat than either the Reservation Road Access Alignment or Daisy Drive Access Alignment. Additionally, the new roadway for the Melody Road Access Alignment would result in conflicts with an established wildlife corridor. Therefore, this Access Road Alignment would be inconsistent with the Healthy Environment Goal of promoting environmental sustainability due to the fact that the new roadway would eliminate natural habitat and conflict with an established wildlife corridor.

The RTP Healthy Environment Goal promotes a transportation system that would foster efficient development patterns that optimize travel, housing, and employment choices. It also should encourage growth away from rural area and closer to existing or planned development. The Access Road Alignments would provide operational improvements for traffic resulting from land use decisions already made by an outside land use authority. In this case, the JIV has already adopted a plan for employment growth and is currently in the process of developing the Gaming Development Project. It optimizes travel choices by providing two bus stops, which makes travel available to those that prefer to use public transit. Housing and employment choices would not be affected given that a majority of the improvements would be in the existing Caltrans ROW. Employment choices would not be affected by the selection of any of the Access Road Alignments. The Access Road Alignments would neither encourage nor discourage growth around rural, existing or planned development. The improvements are proposed to address a Gaming Development Project that has already been approved and is currently under construction; therefore, the proposed improvements would not encourage growth in rural Jamul. The selection of the Melody Road Access Alignment by itself, would not encourage growth in the rural area of the 87-acre parcel located between Melody Road and the JIV Tribal Lands because the existing MSCP discourages future urban uses from being constructed on this parcel.

Consistency with Applicable General Plan and Community/Subregional Plans.

<u>Reservation Road and Daisy Drive Access Alignments</u>. The Access Road Alignments would be consistent with the stated General Plan/Jamul Dulzura Subregional Plan Goals. The Goals of the Valle de Oro Community Plan do not apply to the Access Road Alignments because the intersection is located outside the Valle de Oro Community Plan Area boundaries.

The proposed features for the Access Road Alignments would be consistent with the Jamul/Dulzura Subregional Plan Land Use Goal given that the Proposed Project would modify the roadway within the Proposed Project limits without changing or disrupting rural densities and land uses of the community. The proposed grading limits would extend beyond the Caltrans ROW as detailed in Section 1.4 of the Project Description; however, additional ROW needs would not disrupt rural densities or urban land uses of the community. None of the parcels' acreages would fall below rural density requirements, nor would existing urban land uses be

impacted by the ROW needs. Affected lands (needed for ROW) are undeveloped/uninhabited narrow strips of land adjacent to existing Caltrans ROW, and as such, are lands already influenced by roadways, or have land uses oriented toward roadways, such as driveways, drainage, utility corridors, etc.

The Access Road Alignments would be consistent with the Jamul/Dulzura Subregional Plan Mobility Goal. The proposed improvements would be constructed to be consistent with both Caltrans and County standards, which ensure the establishment of safe, efficient improvements. The roadway improvements, which include the development of two bus stops, would be consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.

Goal 1 of the Mobility Chapter directs that a transportation system be developed that provides for safe, efficient travel throughout this rural community and preserves the beauty, quality, and rural character of the Jamul/Dulzura Subregional Planning area. The Access Road Alignment would add retaining walls and widen lanes that could conflict with maintaining the rural character for this area pursuant to the Jamul/Dulzura Subregional Planning Area. There are two competing interests with respect to mobility: (1) desire to provide a safe, efficient system, and (2) desire to provide a transportation system that maintains the rural character of the area. Existing and future traffic levels show that the improved facility is needed to provide a safe, efficient system in Jamul. Avoidance and minimization measures provided in Section 2.6 Visual Resources/Aesthetics are required to reduce the visual impacts of the Access Road Alignments.

Transportation facility capacity resulting from the Access Road Alignments would not facilitate County land growth that could change the density/intensity of land uses in the area. This is due to the fact that the improved transportation facility would be designed to accommodate existing traffic and planned/approved future traffic only. Therefore, the size of the proposed transportation facility would not result in unplanned (i.e., growth inducing) land use changes that would challenge the rural character of the surrounding community. Please see the discussion of growth-related impacts in Section 2.2.

The Jamul/Dulzura Subregional Plan does include a Policy within the Mobility Goal 3; Policy#15 that is directed to "(e)ncourage the elimination of safety hazards caused by direct access onto major arterial or collector streets. In particular, new commercial development shall have limited access to such roads." The Access Road Alignments would not result in a new connection to major arterial or collector streets; therefore, this Access Road Alignments is considered consistent with Policy #15.

Based on the analysis provided above, the Access Road Alignments would be considered consistent with the Conservation Goal to manage resources for future needs. The use of the bottomless culvert at the proposed Melody Road crossing of Willow Creek for the Access Road Alignments would assist in the preservation of Willow Creek and its adjoining riparian habitat.

The use of retaining walls reduces the need for grading, thereby preserving hillsides and the vegetation that exists in these areas. The use of bioswales preserves the quality of adjoining waterways. Lastly, providing bus stops minimizes the use of single-occupant vehicles, reduces emissions and reduces the use of fossil fuels.

The Access Road Alignments would be consistent with the Jamul/Dulzura Subregional Plan Scenic Highway Goal following implementation of Visual Resource/Aesthetic mitigation listed in Section 2.6.4. As detailed previously in Section 2.1.1 Existing and Future Land Uses, the land uses surrounding the Proposed Project limits of the Access Road Alignments include residential, open space, preserve/reserve, and tribal land. The primary viewer group experiencing this setting is local motorists used to viewing transportation related facilities such as highway, signage and intersections along this corridor. The proposed modifications under the Reservation Road Access Alignments, which include lane improvements; hillside grading; retaining wall installation; two signal installations; bus stop and bioswales development, would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. A less-than-significant impact would result for the Access Road Alignments with listed mitigation in Section 2.6.4 related to retaining walls, concrete barriers, metal beam guard rails, native plantings, and replacement trees. The Access Road Alignments would be consistent with the Jamul/Dulzura Subregional Plan Scenic Highway Goal following implementation of mitigation listed in Section 2.6.4.

<u>Melody Road Access Alignment</u>: The Melody Road Access Alignment would be inconsistent with two goals of the Jamul/Dulzura Subregional Plan. The Goals of the Valle de Oro Community Plan do not apply to the Access Road Alignment because the intersection is located outside the Valle de Oro Community Plan Area boundaries. The Melody Road Access Alignment would cause disruption to the existing wildlife corridor located west of the highway, as detailed in Section 2.16 Natural Communities, causing wildlife conflicts, which would be considered inconsistent with the Conservation and Land Use Goals of the Jamul/Dulzura Community Plan.

The proposed improvements would be constructed to be consistent with both Caltrans and County standards, which ensure the establishment of safe, efficient improvements. The roadway improvements, which include the development of two bus stops, would also be consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.

Goal 1 of the Mobility Chapter directs that a transportation system be developed that provides for safe, efficient travel throughout this rural community and preserves the beauty, quality, and rural character of the Jamul/Dulzura Subregional Planning area. The Melody Road Access Alignment would add retaining walls and widen lanes that could conflict with maintaining the rural character for this area pursuant to the Jamul/Dulzura Subregional Planning Area.

Transportation facility capacity resulting from the Melody Road Access Alignment would not facilitate County land growth that could change the density/intensity of land uses in the area. This is due to the fact that the improved transportation facility would be designed to accommodate existing traffic and planned/approved future traffic only. Therefore, the size of the proposed transportation facility would not result in unplanned (i.e., growth inducing) land use changes that would challenge the rural character of the surrounding community. Please see the discussion of growth-related impacts in Section 2.2.

The Jamul/Dulzura Subregional Plan does include a Policy within the Mobility Goal 3; Policy#15 that is directed to "(e)ncourage the elimination of safety hazards caused by direct access onto major arterial or collector streets. In particular, new commercial development shall have limited access to such roads." The Melody Road Access Alignment from the JIV Tribal Lands to Melody Road would connect a commercial establishment (the JIV Gaming Development Project) into a rural light collector street (Melody Road), which conflicts with this stated County Policy. The Melody Road Access Alignment would be considered inconsistent with Mobility Goal 3, Policy #15 of the Jamul/Dulzura Subregional Plan.

The use of the bottomless culvert at the proposed Melody Road crossing of Willow Creek for the Access Road Alignments would assist in the preservation of Willow Creek and its adjoining riparian habitat. The use of retaining walls reduces the need for grading, thereby preserving hillsides and the vegetation that exists in these areas. The use of bioswales preserves the quality of adjoining waterways. Lastly, providing bus stops minimizes the use of single-occupant vehicles, reduces emissions and reduces the use of fossil fuels.

However, the Melody Road Access Alignment does include a new roadway through an undeveloped area that is currently used as a wildlife corridor by area wildlife. The location of the new road under this Alignment would result in the greatest impact to Hardline Preserve lands when compared against the Reservation Road and Daisy Drive (Options1-3) Access Alignments. Given the above, the selection of the Melody Road Access Alignment would not result in the careful management of environmental resources when compared with the Reservation Road Daisy Drive Access Alignments. Therefore, the Melody Road Access Alignment would be considered inconsistent with the Conservation Goal of the Jamul/Dulzura Subregional Plan.

The Melody Road Access Alignment would be consistent with the Jamul/Dulzura Subregional Plan Scenic Highway Goal following implementation of Visual Resource/Aesthetic mitigation listed in Section 2.6.4. As detailed previously in Section 2.1.1 Existing and Future Land Uses, the land uses surrounding the Proposed Project limits of the Access Road Alignment include residential, open space, preserve/reserve, and tribal land. The primary viewer group experiencing this setting is local motorists used to viewing transportation related facilities such as highway, signage and intersections along this corridor. The proposed modifications, which include lane improvements; hillside grading; retaining wall installation; two signal installations; bus stop and bioswales development, would contribute to a more dissonant relationship between

the proposed features and elevations and the existing topography. The Melody Road Access Road Alignments would be consistent with the Jamul/Dulzura Subregional Plan Scenic Highway Goal following implementation of mitigation listed in Section 2.6.4, which includes retaining walls, concrete barriers, metal beam guard rails, native plantings, and replacement trees.

MSCP Consistency

Portions of the proposed Access Road Alignments are located within the MSCP. Other portions of the Proposed Project area are within the Caltrans ROW, which is not subject to the MSCP. Construction of the Access Road Alignments would impact natural habitats within the MSCP. To achieve consistency with the MSCP, lands not authorized for take would need to be designated as developable by a MSCP Plan boundary adjustment or by a Minor Amendment to the MSCP Subarea Plan, which requires approval by the San Diego County Planning Director and dedication of new preserve lands. Development within the MSCP is consistent with the MSCP Goals as long as compensatory mitigation for natural habitat disturbance/loss is performed as specified in the MSCP and BMO. With implementation of these measures, the Proposed Project would not be inconsistent with the Goals of the MSCP for the Access Road Alignments.

Land Management Plan (LMP) for the Rancho Jamul Ecological Reserve

The Reservation Road Access Alignment and Daisy Drive Access Alignment; Option 1 Full Footprint would avoid the RJER. The remaining Access Road Alignments would all require ROW from the RJER as shown in Chapter 1 Project Description (see ROW Detail Tables 1-7 through 1-9 for APN 597-080-700). The Daisy Drive Access Alignment; Option 2 Reduced Footprint would require the most land from the RJER measuring 0.56-acres of land along the SR-94 frontage as shown in the Chapter 1 plans. This area consists of upland non-native grasses with limited habitat value for wildlife. No listed plant/animal species have been observed within this frontage strip along SR-94. The use of this strip of frontage land would be inconsistent with the RJER LMP management, maintenance and restoration goals before mitigation because it would result in a reduction in land area of the reserve. However, compensatory mitigation would be performed at a 3:1 ratio, with new, higher-quality land being added to the RJER (see Natural Communities Section 2.16.3). The net effect would be an expansion of the RJER in terms of acreage and an increase in habitat quality. Therefore, implementation of the Access Road Alignments would be consistent with the goals of the LMP for the Rancho Jamul Ecological Reserve.

Land Management Plan (LMP) for the Hollenbeck Canyon Wildlife Area

The Access Road Alignments would require ROW from the HCWA as shown in Chapter 1 Project Description (see ROW Detail Tables 1-5 through 1-9 for APN 597-080-800). The Reservation Road Access Alignment would require the most land from the HCWA measuring 1.72 acres of land along the SR-94 frontage as shown in the Chapter 1 plans. This area consists of disturbed areas and upland non-native grasses with limited habitat value for wildlife, and is managed for hunting dog training. No listed plant/animal species have been observed within this frontage strip along SR-94 (see Section 2.18 Plant Species and 2.19 Animal Species). The use of this strip of frontage land would be inconsistent with the HCWA LMP management, maintenance and restoration goals before mitigation because it would result in a reduction in land area of the Wildlife Area. However, compensatory mitigation would be performed at a 3:1 ratio, with new, higher-quality land being added to the HCWA (see Natural Communities Section 2.16.3). The net effect would be an expansion of the HCWA in terms of acreage and an increase in habitat quality. Therefore, implementation of the Access Road Alignments would not adversely affect nor be inconsistent with the HCWA LMP management, maintenance and restoration Goals.

Comprehensive Conservation Plan (CCP) for the San Diego National Wildlife Refuge (NWR)

The Access Road Alignments would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR. Accordingly, improvements proposed for the Access Road Alignments would not impede the USFWS plan for management, maintenance and restoration of the NWR.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result from this No Project Alternative.

2.1.2.2 Avoidance, Minimization and/or Mitigation Measures

Consistency with State, Regional, and Local Plans and Programs

(1) Implement Visual Resources/Aesthetics Avoidance, Minimization and Mitigation Measures for Retaining Walls, Concrete Barriers, Metal Beam Guard Rails with Patina, Replacement Highway Planting, and Replacement Trees (Section 2.6.4).

(2) Implement Natural Communities Avoidance, Minimization and Mitigation Measures for Permanent Impacts (Section 2.16.3).

TABLE 2.1-2
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
2050 RTP/RTIP						
Mobility Goal: *The transportation system should provide the general public and those who move goods with convenient travel options. The system should operate in a way that maximizes productivity. It should reduce the time it takes to travel and the cost associated with travel.*	**Consistent**. Reservation Road Access and Non-Access Road Intersections would reduce the time it takes to travel.	**Consistent**. Daisy Drive: Option 1 Access and Non-Access Road Intersection improvements would reduce the time it takes to travel.	**Consistent**. Daisy Drive: Option 2 Access and Non-Access Road Intersection improvements would reduce the time it takes to travel.	**Consistent**. Daisy Drive: Option 3 Access and Non-Access Road Intersection improvements would reduce the time it takes to travel.	**Consistent**. The Melody Road Access and Non-Access Road Intersection improvements would reduce the time it takes to travel.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
Reliability Goal: The transportation system should be reliable. Travelers should expect relatively consistent travel times, from day to day, for the same trip and mode of transportation.	**Consistent**. Reservation Road Access and Non-Access Road Intersections would provide relatively consistent travel time through this area	**Consistent**. Daisy Drive: Option 1 Access and Non-Access Road Intersection improvements would provide relatively consistent travel time through this area	**Consistent**. Daisy Drive: Option 2 Access and Non-Access Road Intersection improvements would provide relatively consistent travel time through this area	**Consistent**. Daisy Drive: Option 3 Access and Non-Access Road Intersection improvements would provide relatively consistent travel time through this area	**Consistent**. The Melody Road Access and Non-Access Road Intersection improvements would provide relatively consistent travel time through this area	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
System Preservation and Safety Goal: The transportation system should be well maintained to protect the public investment in transportation. It also is critical to ensure a safe regional	**Consistent**. Reservation Road Access and Non-Access Road Intersections would be designed and built pursuant to Caltrans' design manual and maintained by Caltrans.	**Consistent**. Daisy Drive: Option 1 Access and Non-Access Road Intersection improvements would be designed and built pursuant to Caltrans' design manual and maintained by Caltrans.	**Consistent**. Daisy Drive: Option 2 Access and Non-Access Road Intersection improvements would be designed and built pursuant to Caltrans' design manual and maintained by Caltrans.	**Consistent**. Daisy Drive: Option 3 Access and Non-Access Road Intersection improvements would be designed and built pursuant to Caltrans' design manual and maintained by Caltrans.	**Consistent**. The Melody Road Access and Non-Access Road Intersection improvements would be designed and built pursuant to Caltrans' design manual and maintained by Caltrans.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
transportation system.						would result.
Healthy Environment Goal: the transportation system should promote environmental sustainability and foster efficient development patterns that optimize travel, housing, and employment choices. The system should encourage growth away from rural areas and closer to existing and planned development.	**Consistent**. Reservation Road Access and Non-Access Road Intersection improvements are proposed for an existing roadway and are located primarily within the existing ROW. Identified mitigation ensures all improvements would be consistent with the Healthy Environment Goal.	**Consistent**. Daisy Drive: Option 1 Access and Non-Access Road Intersection improvements are proposed for an existing roadway and are located primarily within the existing ROW. Identified mitigation ensures all improvements would be consistent with the Healthy Environment Goal.	**Consistent**. Daisy Drive: Option 2 Access and Non-Access Road Intersection improvements are proposed for an existing roadway and are located primarily within the existing ROW. Identified mitigation ensures all improvements would be consistent with the Healthy Environment Goal.	**Consistent**. Daisy Drive: Option 3 Access and Non-Access Road Intersection improvements are proposed for an existing roadway and are located primarily within the existing ROW. Identified mitigation ensures all improvements would be consistent with the Healthy Environment Goal.	**Inconsistent**. The Melody Road Access and Non-Access Road Intersection improvements would result in the construction of a new and separate roadway where none currently exists (Melody Road Access). This new roadway would result in natural habitat impacts and would conflict with an established wildlife corridor.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
General Plan and Community/Subregional Plans						
Valle de Oro Community Plan[1]						
Community Character: Retain the unique balance of urban, semi-rural agricultural and open space land uses within the community, with open space and low density buffers that separate the community from adjacent cities and	**Consistent**. Planned improvements at the two affected intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would not	**Consistent**. Planned improvements at the two affected intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved areas. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would not	**Consistent**. Planned improvements at the two affected intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved areas. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would not	**Consistent**. Planned improvements at the two affected intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved areas. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would not	**Consistent**. Planned improvements at the two affected intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved areas. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would not	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

[1] / Improvements for SR-94/Jamacha Boulevard and SR-94/Jamacha Road intersections are only Proposed Project features subject to the Valle de Oro Community Plan. All other features fall outside the Valle de Oro Community Plan boundaries.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
unincorporated communities, while new development within the community conserves natural resources and topography.	significantly impact natural resources or natural topography.	significantly impact natural resources or natural topography.	significantly impact natural resources or natural topography.	significantly impact natural resources or natural topography.	significantly impact natural resources or natural topography.	
Open Space: The preservation of open space including sensitive habitat, steep slopes, canyons, floodplains, and agricultural lands; and regulation of the use of open space within the community.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
Mobility: Provide a balanced, coordinated transportation system which will provide safe, efficient circulation within and through the community that will effectively connect Valle de Oro to	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies, which is consistent with the goal of proving a safe, efficient circulation system within	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies, which is consistent with the goal of proving a safe, efficient circulation system within	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies, which is consistent with the goal of proving a safe, efficient circulation system within	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies, which is consistent with the goal of proving a safe, efficient circulation system within	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies, which is consistent with the goal of proving a safe, efficient circulation system within	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
neighboring communities, and which will complement existing and future land use patterns.	and throughout the community.	and throughout the community.	and throughout the community.	and throughout the community.	and throughout the community.	
Conservation: Promote conservation and planned management of all valuable resources, natural and man-made, and prevent wasteful exploitation and destruction of the resources.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve existing intersections and focus mostly on existing paved intersections. The minor off-pavement improvements proposed for the SR-94/Jamacha Road intersection would encroach onto land used by the San Diego County Department of Public Works. The proposed improvements would not significantly impact natural resources or natural topography.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
Scenic Highways: Utilize scenic highway corridors as one method of protecting and enhancing the appearance of scenic, historical, and recreational areas.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not result in a significant visual impact. The restriping of Jamacha Boulevard would not detract from the scenic values. The SR-94/Jamacha Road	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not result in a significant visual impact. The restriping of Jamacha Boulevard would not detract from the scenic values. The SR-	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not result in a significant visual impact. The restriping of Jamacha Boulevard would not detract from the scenic values. The SR-94/Jamacha Road	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not result in a significant visual impact. The restriping of Jamacha Boulevard would not detract from the scenic values. The SR-94/Jamacha Road	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not result in a significant visual impact. The restriping of Jamacha Boulevard would not detract from the scenic values. The SR-	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
	intersection is surrounded by commercial and public land uses, which do not contribute to natural scenic values along SR-94. The proposed modifications to this intersection would not detract from the scenic values of SR-94.	94/Jamacha Road intersection is surrounded by commercial and public land uses, which do not contribute to natural scenic values along SR-94. The proposed modifications to this intersection would not detract from the scenic values of SR-94.	intersection is surrounded by commercial and public land uses, which do not contribute to natural scenic values along SR-94. The proposed modifications to this intersection would not detract from the scenic values of SR-94.	intersection is surrounded by commercial and public land uses, which do not contribute to natural scenic values along SR-94. The proposed modifications to this intersection would not detract from the scenic values of SR-94.	94/Jamacha Road intersection is surrounded by commercial and public land uses, which do not contribute to natural scenic values along SR-94. The proposed modifications to this intersection would not detract from the scenic values of SR-94.	
Public Safety: Develop and maintain plans and programs to assure the health, safety, and well-being of the residents of the Valle de Oro community.	**Consistent.** Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies consistent with Caltrans standards, which is consistent with the goal of assuring the health, safety and well-being of the residents of the community.	**Consistent.** Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies consistent with Caltrans standards, which is consistent with the goal of assuring the health, safety and well-being of the residents of the community.	**Consistent.** Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies consistent with Caltrans standards, which is consistent with the goal of assuring the health, safety and well-being of the residents of the community.	**Consistent.** Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies consistent with Caltrans standards, which is consistent with the goal of assuring the health, safety and well-being of the residents of the community.	**Consistent.** Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would improve operational efficiencies consistent with Caltrans standards, which is consistent with the goal of assuring the health, safety and well-being of the residents of the community.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
Noise: Protect and enhance Valle de Oro's acoustical environment by supporting the control of noise at its source, along its transmission path, and at the site of sensitive receptors.	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not increase long-term noise. The restriping of Jamacha Boulevard would not increase long-term noise given that roadway striping and vehicle use currently exist at this location. The SR-94/Jamacha Road intersection is surrounded by commercial and public	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not increase long-term noise. The restriping of Jamacha Boulevard would not increase long-term noise given that roadway striping and vehicle use currently exist at this location. The SR-94/Jamacha Road intersection is surrounded by commercial and public	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not increase long-term noise. The restriping of Jamacha Boulevard would not increase long-term noise given that roadway striping and vehicle use currently exist at this location. The SR-94/Jamacha Road intersection is surrounded by commercial and public	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not increase long-term noise. The restriping of Jamacha Boulevard would not increase long-term noise given that roadway striping and vehicle use currently exist at this location. The SR-94/Jamacha Road intersection is surrounded by commercial and public	**Consistent**. Planned improvements at the two affected Non-Access Road Intersections (Jamacha Blvd. and Jamacha Rd.) would not increase long-term noise. The restriping of Jamacha Boulevard would not increase long-term noise given that roadway striping and vehicle use currently exist at this location. The SR-94/Jamacha Road intersection is surrounded	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
	land uses. According to Section 2.14 Noise, the proposed improvements would not result in a substantial noise increase at any receivers and traffic noise levels would not approach or exceed the noise abatement criteria at any receiver.	land uses. According to Section 2.14 Noise, the proposed improvements would not result in a substantial noise increase at any receivers and traffic noise levels would not approach or exceed the noise abatement criteria at any receiver.	land uses. According to Section 2.14 Noise, the proposed improvements would not result in a substantial noise increase at any receivers and traffic noise levels would not approach or exceed the noise abatement criteria at any receiver.	land uses. According to Section 2.14 Noise, the proposed improvements would not result in a substantial noise increase at any receivers and traffic noise levels would not approach or exceed the noise abatement criteria at any receiver.	by commercial and public land uses. According to Section 2.14 Noise, the proposed improvements would not result in a substantial noise increase at any receivers and traffic noise levels would not approach or exceed the noise abatement criteria at any receiver.	
Jamul/Dulzura Subregional Plan[2]						
Land Use: Development of the land in such a manner as to retain the rural densities and land uses of the community.	**Consistent**. The additional ROW needed for the Non-Access Road Intersections and the Reservation Road Access would not affect rural densities, nor would existing structures be significantly impacted. Although parking spaces on the south side of SR-94 at the Steele Canyon Rd. intersection would be eliminated, sufficient parking would exist during and following construction.	**Consistent**. The additional ROW needed for the Non-Access Road Intersections and the Daisy Drive Access: Option 1 would not affect rural densities, nor would existing structures be significantly impacted. Although parking spaces on the south side of SR-94 at the Steele Canyon Rd. intersection would be eliminated, sufficient parking would exist during and following construction.	**Consistent**. The additional ROW needed for the Non-Access Road Intersections and the Daisy Drive Access: Option 2 would not affect rural densities, nor would existing structures be significantly impacted. Although parking spaces on the south side of SR-94 at the Steele Canyon Rd. intersection would be eliminated, sufficient parking would exist during and following construction.	**Consistent**. The additional ROW needed for the Non-Access Road Intersections and the Daisy Drive Access: Option 3 would not affect rural densities, nor would existing structures be significantly impacted. Although parking spaces on the south side of SR-94 at the Steele Canyon Rd. intersection would be eliminated, sufficient parking would exist during and following construction.	**Inconsistent**. The Melody Road Access Alignment would cause disruption to the existing wildlife corridor located west of the highway, as detailed in Section 2.16 Natural Communities, causing wildlife conflicts, which would be considered inconsistent with the Conservation and Land Use Goals of the Jamul/Dulzura Community Plan.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
Mobility: Develop a transportation system that provides for safe, efficient travel throughout this rural community and preserves the beauty,	**Consistent.** The proposed improvements for the Non-Access Road Intersections and Reservation Road Access would be constructed to be consistent	**Consistent.** The proposed improvements for the Non-Access Road Intersections and Daisy Drive Access: Option 1 would be constructed to be	**Consistent.** The proposed improvements for the Non-Access Road Intersections and Daisy Drive Access: Option 2 would be constructed to be consistent	**Consistent.** The proposed improvements for the Non-Access Road Intersections and Daisy Drive Access: Option 3 would be constructed to be consistent	**Consistent.** The proposed improvements for the Non-Access Road Intersections and Melody Road Access would be constructed to be consistent with both the	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative;

[2] / Goals of the Jamul/Dulzura Subregional Plan apply to all Proposed Project features except for those at SR-94/Jamacha Boulevard and SR-94/Jamacha Road intersections because these intersections are outside of the Plan boundaries.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
quality, and rural character of the Jamul/Dulzura Subregional Planning area. Automobile and non-motorized modes of travel are accommodated within the planning area. A local road system that is safe and efficient.	with both the Caltrans and County standards, which would ensure the establishment of safe, efficient improvements. The proposed roadway improvements would contain features consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.	consistent with both the Caltrans and County standards, which would ensure the establishment of safe, efficient improvements. The proposed roadway improvements would contain features consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.	with both the Caltrans and County standards, which would ensure the establishment of safe, efficient improvements. The proposed roadway improvements would contain features consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.	with both the Caltrans and County standards, which would ensure the establishment of safe, efficient improvements. The proposed roadway improvements would contain features consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.	Caltrans and County standards, which would ensure the establishment of safe, efficient improvements. The proposed roadway improvements would contain features consistent with the Mobility Goal of accommodating automobile and non-motorized modes of travel in the planning area.	therefore, no impacts with adopted plans would result.
Conservation: Environmental resources in the Jamul/Dulzura area that are carefully managed to maintain them for future needs.	**Consistent.** The use of such features as bioswales and a bottomless culvert at Melody Road in the proposed improvements, as well as mitigation for Diegan coastal sage scrub at the SR-94/Maxfield Intersection and mitigation for southern coast live oak riparian habitat at the SR-94/Lyons Valley Road Intersection ensure consistency with the Conservation goal.	**Consistent.** The use of such features as bioswales and a bottomless culvert at Melody Road in the proposed improvements, as well as mitigation for Diegan coastal sage scrub at the SR-94/Maxfield Intersection and mitigation for southern coast live oak riparian habitat at the SR-94/Lyons Valley Road Intersection ensure consistency with the Conservation goal.	**Consistent.** The use of such features as bioswales and a bottomless culvert at Melody Road in the proposed improvements, as well as mitigation for Diegan coastal sage scrub at the SR-94/Maxfield Intersection and mitigation for southern coast live oak riparian habitat at the SR-94/Lyons Valley Road Intersection ensure consistency with the Conservation goal.	**Consistent.** The use of such features as bioswales and a bottomless culvert at Melody Road in the proposed improvements, as well as mitigation for Diegan coastal sage scrub at the SR-94/Maxfield Intersection and mitigation for southern coast live oak riparian habitat at the SR-94/Lyons Valley Road Intersection ensure consistency with the Conservation goal.	**Inconsistent**. The Non-Access Road Intersections would use bioswales for each intersection that increases impervious surfaces, and would apply mitigation for Diegan coastal sage scrub impacts at the SR-94/Maxfield Intersection and for southern coast live oak riparian impacts at the SR-94/Lyons Valley Road Intersection. The Melody Road Access; however, includes a new roadway through an undeveloped area that is currently used as a wildlife corridor by area wildlife. The selection of the Melody Road Access Alignment would not result in the careful management of environmental resources.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
Scenic Highways: The designation of a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area.	**Consistent**. The proposed improvements for the Non-Access Road Intersections would result in a change to change to the existing visual character that is contextual with the roadway corridor. The proposed features would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area. The proposed modifications under the Reservation Road Access would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. The Reservation Road Access would be consistent with this goal following implementation of mitigation listed in Section 2.6.4.	**Consistent**. The proposed improvements for the Non-Access Road Intersections would result in a change to change to the existing visual character that is contextual with the roadway corridor. The proposed features would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area. The proposed modifications under the Daisy Drive Access: Option 1 would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. The Daisy Drive Access would be consistent with this goal following implementation of mitigation listed in Section 2.6.4.	**Consistent**. The proposed improvements for the Non-Access Road Intersections would result in a change to change to the existing visual character that is contextual with the roadway corridor. The proposed features would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area. The proposed modifications under the Daisy Drive Access: Option 2 would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. The Daisy Drive Access would be consistent with this goal following implementation of mitigation listed in Section 2.6.4.	**Consistent**. The proposed improvements for the Non-Access Road Intersections would result in a change to change to the existing visual character that is contextual with the roadway corridor. The proposed features would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area. The proposed modifications under the Daisy Drive Access: Option 3 would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. The Daisy Drive Access would be consistent with this goal following implementation of mitigation listed in Section 2.6.4.	**Consistent**. The proposed improvements for the Non-Access Road Intersections would result in a change to change to the existing visual character that is contextual with the roadway corridor. The proposed features would not detract from a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area. The proposed modifications under the Melody Road Access would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. The Melody Road Access would be consistent with this goal following implementation of mitigation listed in Section 2.6.4.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
San Diego County Multiple Species Conservation Plan (MSCP)						
	Consistent. For the portion of the Proposed Project site subject to the MSCP, compensatory mitigation for habitat disturbance/loss would be performed as specified in the MSCP and	**Consistent**. For the portion of the Proposed Project site subject to the MSCP, compensatory mitigation for habitat disturbance/loss would be performed as specified in the MSCP and	**Consistent**. For the portion of the Proposed Project site subject to the MSCP, compensatory mitigation for habitat disturbance/loss would be performed as specified in the MSCP and	**Consistent**. For the portion of the Proposed Project site subject to the MSCP, compensatory mitigation for habitat disturbance/loss would be performed as specified in the MSCP and	**Consistent**. For the portion of the Proposed Project site subject to the MSCP, compensatory mitigation for habitat disturbance/loss would be performed as specified in the MSCP and	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
	Biological Mitigation Ordinance, which would ensure consistency with the MSCP.	Biological Mitigation Ordinance, which would ensure consistency with the MSCP.	Biological Mitigation Ordinance, which would ensure consistency with the MSCP.	Biological Mitigation Ordinance, which would ensure consistency with the MSCP.	Biological Mitigation Ordinance, which would ensure consistency with the MSCP.	impacts with adopted plans would result.
Land Management Plan (LMP) for the Rancho Jamul Ecological Reserve						
	Consistent. The Non-Access Road Intersection improvements and Reservation Road Access would have no impact on the RJER given that they are not within the RJER, nor do they require any additional ROW from the RJER.	**Consistent**. The Non-Access Road Intersection improvements and Daisy Drive Access: Option 1 would have no impact on the RJER given that they are not within the RJER, nor do they require any additional ROW from the RJER.	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the RJER given that they are not adjacent to or within the RJER, nor do they require any additional ROW from the RJER. The Daisy Drive Access: Option 2 would require a strip of ROW, which would necessitate compensatory mitigation to be performed at a 3:1 ratio, with new, higher quality land.	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the RJER given that they are not adjacent to or within the RJER, nor do they require any additional ROW from the RJER. The Daisy Drive Access: Option 3 would require a strip of ROW, which would necessitate compensatory mitigation to be performed at a 3:1 ratio, with new, higher quality land.	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the RJER given that they are not adjacent to or within the RJER, nor do they require any additional ROW from the RJER. The Melody Road Access would require a strip of ROW, which would necessitate compensatory mitigation to be performed at a 3:1 ratio, with new, higher quality land.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.
Land Management Plan (LMP) for the Hollenbeck Canyon Wildlife Area						
	Consistent. The Non-Access Road Intersection improvements would have no impact on the HCWA given that they are not adjacent to or within the HCWA, nor do they require any additional ROW from the HCWA. The Reservation Road Access would require a strip of ROW, which would necessitate compensatory	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the HCWA given that they are not adjacent to or within the HCWA, nor do they require any additional ROW from the HCWA. The Daisy Drive Access: Option 1 would require a strip of ROW, which would necessitate	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the HCWA given that they are not adjacent to or within the HCWA, nor do they require any additional ROW from the HCWA. The Daisy Drive Access: Option 2 would require a strip of ROW, which would necessitate	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the HCWA given that they are not adjacent to or within the HCWA, nor do they require any additional ROW from the HCWA. The Daisy Drive Access: Option 3 would require a strip of ROW, which would necessitate	**Consistent**. The Non-Access Road Intersection improvements would have no impact on the HCWA given that they are not adjacent to or within the HCWA, nor do they require any additional ROW from the HCWA. The Melody Road Access would require a strip of ROW, which would necessitate compensatory	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

TABLE 2.1-2 cont.
CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PLANS AND PROGRAMS

	Alt 1	Preferred Alternative Alt 2: Opt 1	Alt 2: Opt 2	Alt 2: Opt 3	Alt 3	Alt 4: No Project Alt
	mitigation to be performed at a 3:1 ratio, with new, higher quality land.	compensatory mitigation to be performed at a 3:1 ratio, with new, higher quality land.	compensatory mitigation to be performed at a 3:1 ratio, with new, higher quality land.	compensatory mitigation to be performed at a 3:1 ratio, with new, higher quality land.	mitigation to be performed at a 3:1 ratio, with new, higher quality land.	
Comprehensive Conservation Plan (CCP) for the San Diego National Wildlife Refuge (NWR)						
	Consistent. The Non-Access Road Intersection improvements and Reservation Road Access would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR.	**Consistent**. The Non-Access Road Intersection improvements and Daisy Drive Access: Option 1 would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR.	**Consistent**. The Non-Access Road Intersection improvements and Daisy Drive Access: Option 2 would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR.	**Consistent**. The Non-Access Road Intersection improvements and Daisy Drive Access: Option 3 would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR.	**Consistent**. The Non-Access Road Intersection improvements and Melody Road Access would have no impact on the San Diego NWR given that they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR.	No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts with adopted plans would result.

2.1.3 Park and Recreational Facilities

2.1.3.1 Regulatory Setting

This Proposed Project would affect facilities that are protected by the Park Preservation Act (California Public Resources Code [PRC] Sections 5400-5409). The Park Preservation Act prohibits local and state agencies from acquiring any property which is in use as a public park at the time of acquisition unless the acquiring agency pays sufficient compensation or land, or both, to enable the operator of the park to replace the park land and any park facilities on that land.

2.1.3.2 Affected Environment

San Diego County Park System

The San Diego County Parks and Recreation Department maintains a system of local and regional parks, campgrounds, 300-miles of trails, fishing lakes, recreation centers/sports complexes, ecological preserves and open space preserves. No County park facility is located within the Proposed Project limits, and the closest County park facility is located approximately 1-mile from the Proposed Project limits.

Rancho Jamul Ecological Reserve

For a discussion of the RJER, please see Section 2.1.2 Land Management Plan (LMP) for the Rancho Jamul Ecological Reserve.

Hollenbeck Canyon Wildlife Management Area

For a discussion of the HCWMA, please see Section 2.1.2 Land Management Plan (LMP) for the Hollenbeck Canyon Wildlife Area.

San Diego National Wildlife Refuge

For a discussion of the San Diego NWR, please see Section 2.1.2 Comprehensive Conservation Plan (CCP) for the San Diego NWR.

2.1.3.3 Environmental Consequences

The consistency with adopted plans discussion below is divided into two sections: (1) Common Design Features of the Build Alternatives, and (2) Unique Features of the Build Alternatives.

Parks and Recreational Facilities

Non-Access Road Intersections

The closest boundary of the San Diego National Wildlife Refuge to the Proposed Project limits is approximately 1,000 feet south of the SR-94/Jamacha Boulevard Intersection. The proposed improvements for this intersection are confined to land currently within the Caltrans ROW. Non-Access Road Intersections requiring additional ROW include SR-94/Jamacha Road, SR-94/Steele Canyon Road and SR-94/Maxfield Road. The SR-94/Jamacha Road Intersection is approximately 3,000 feet north of the Refuge, while SR-94/Steele Canyon Road and SR-94/Maxfield Road intersections are 750 feet north and 4,000 feet southeast of the Refuge, respectively. The SR-94/Lyons Valley Road Intersection improvements, which are approximately 2,700 feet southeast of the Refuge, would occur within or directly adjacent to the existing Caltrans ROW. No portion of the Non-Access Road Intersection improvements would be located adjacent to or on San Diego County NWR land, nor would NWR recreational activities be disrupted by the Proposed Project features. Therefore, no impact to the San Diego County NWR would result from implementation of the Non-Access Road Intersection improvements.

The Non-Access Road intersections would have no impact on the RJER or HCWA given that the intersections are not adjacent to or within close proximity to either. The proposed ROW needed for the SR-94/Jamacha Road, SR-94/Steele Canyon Road, and SR-94/Maxfield Road intersection improvements do not require land from ROW from the RJER or HCWA. Therefore, a less-than-significant impact to the RJER and HCWA would result from implementation of the Non-Access Road Intersection improvements.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

The San Diego NWR is located approximately 3.5 miles to the west of the Access Road Alignments. No portion of the proposed Access Road Alignment improvements would be located on or adjacent to the San Diego County NWR, nor would NWR recreational activities be disrupted by the Proposed Project features. Therefore, no impact to the San Diego NWR would result from implementation of the proposed Access Road Alignment improvements.

Some of the Access Road Alignments would require additional ROW from the RJER. The additional ROW needed for the proposed SR-94 Improvements on the west side of SR-94 would be located on a strip of RJER land immediately adjacent to SR-94. Total RJER ROW needed for the access improvements ranges from a maximum of 0.56 acres for the Daisy Drive Alignment; Option 2 Reduced Footprint to no acres for the Reservation Road Access and the Daisy Drive

Access; Options 1 Full Footprint alignments. The width varies from a maximum of approximately 43 feet for the Daisy Drive Access Alignment; Option 2 and the Melody Road Access Alignment, to no ROW being required for the Reservation Road Access and Daisy Drive Access; Options 1 Full Footprint alignments. The needed ROW is widest near the JIV Tribal Lands at the northern end of the RJER and tapers down as one travels in a southeasterly direction away from the JIV Tribal Lands. The land is occupied by grasslands and utility poles. This land is not used for recreational uses. The proposed Access Road Alignments would not impact recreational activities on the RJER.

The additional ROW needed for the proposed SR-94 Improvements on the east side of SR-94 would be located on a strip of HCWA land immediately adjacent to SR-94. Total HCWA ROW needed for the access improvements ranges from a maximum of 1.72 acres for the Reservation Road Alignment to 0.05 acres for the Daisy Drive Access Alignment; Option 3 Minimum Footprint. The width varies from a maximum of approximately 86 feet for the Reservation Road Alignment to 3.5 feet for the Melody Road Access Alignment. As is the case for the RJER land across SR-94, the land is occupied by grasslands and utility poles. This land is not currently used for recreational uses. The recreational activities allowed throughout the HCWA per the LMP include hiking, wildlife observation and managed hunting. The proposed Access Road Alignments would not impact recreational activities on the HCWA.

2.1.3.4 Avoidance, Minimization and/or Mitigation Measures

No avoidance, minimization and/or mitigation measures are required.

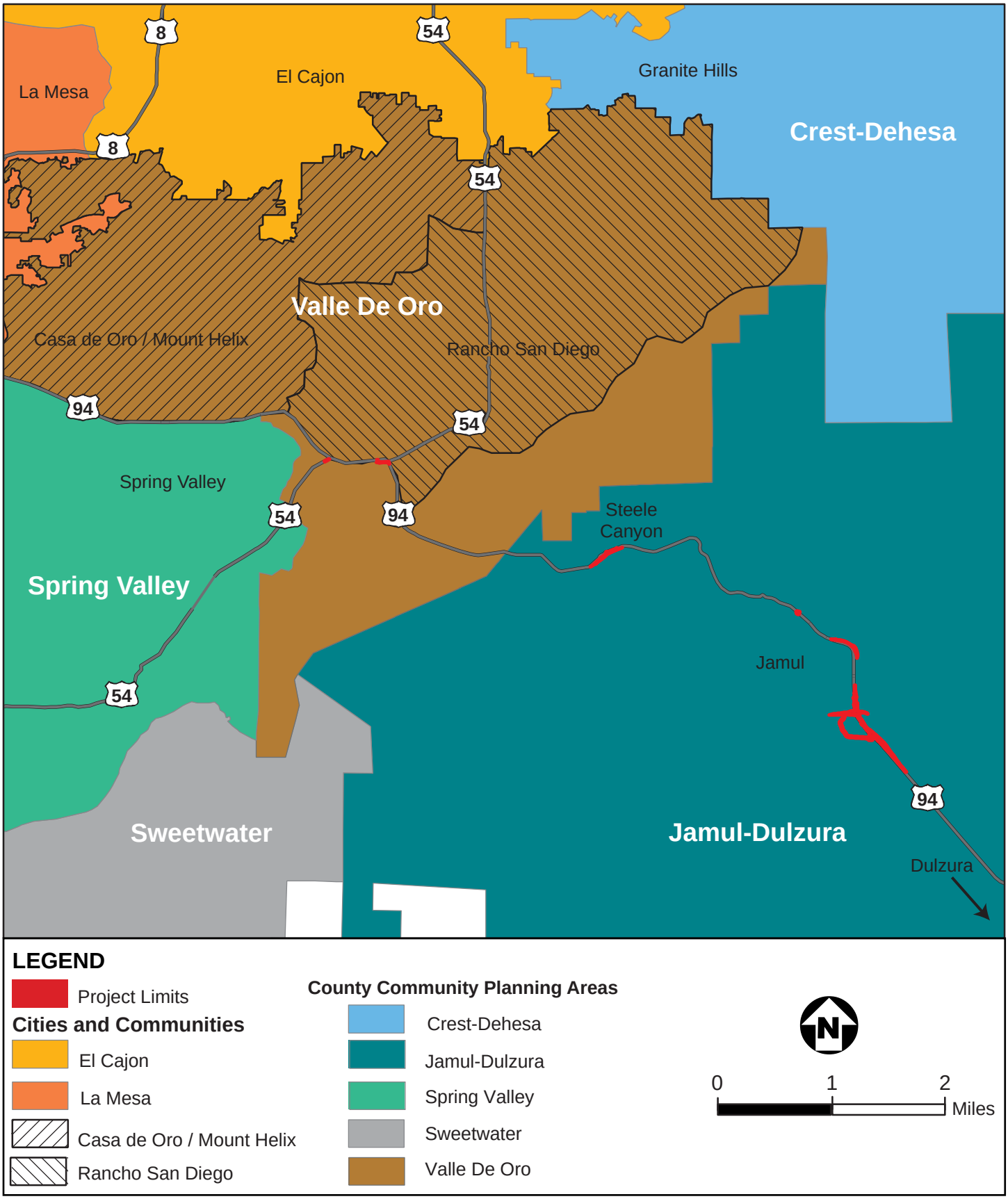


Figure 2.1-1
Planning Areas

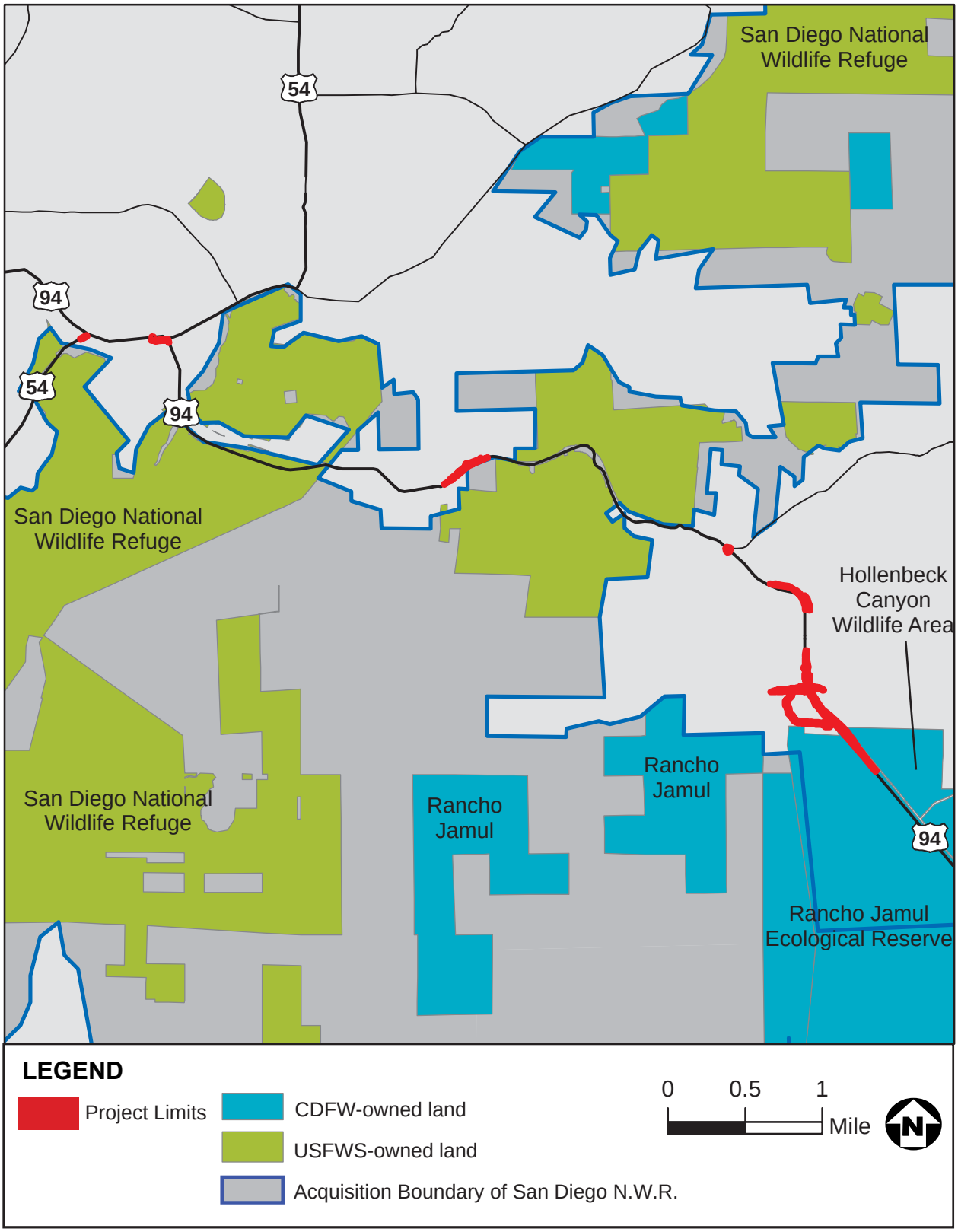


Figure 2.1-2
State and Federal Wildlife Agency Lands in the Vicinity of the Project Limits

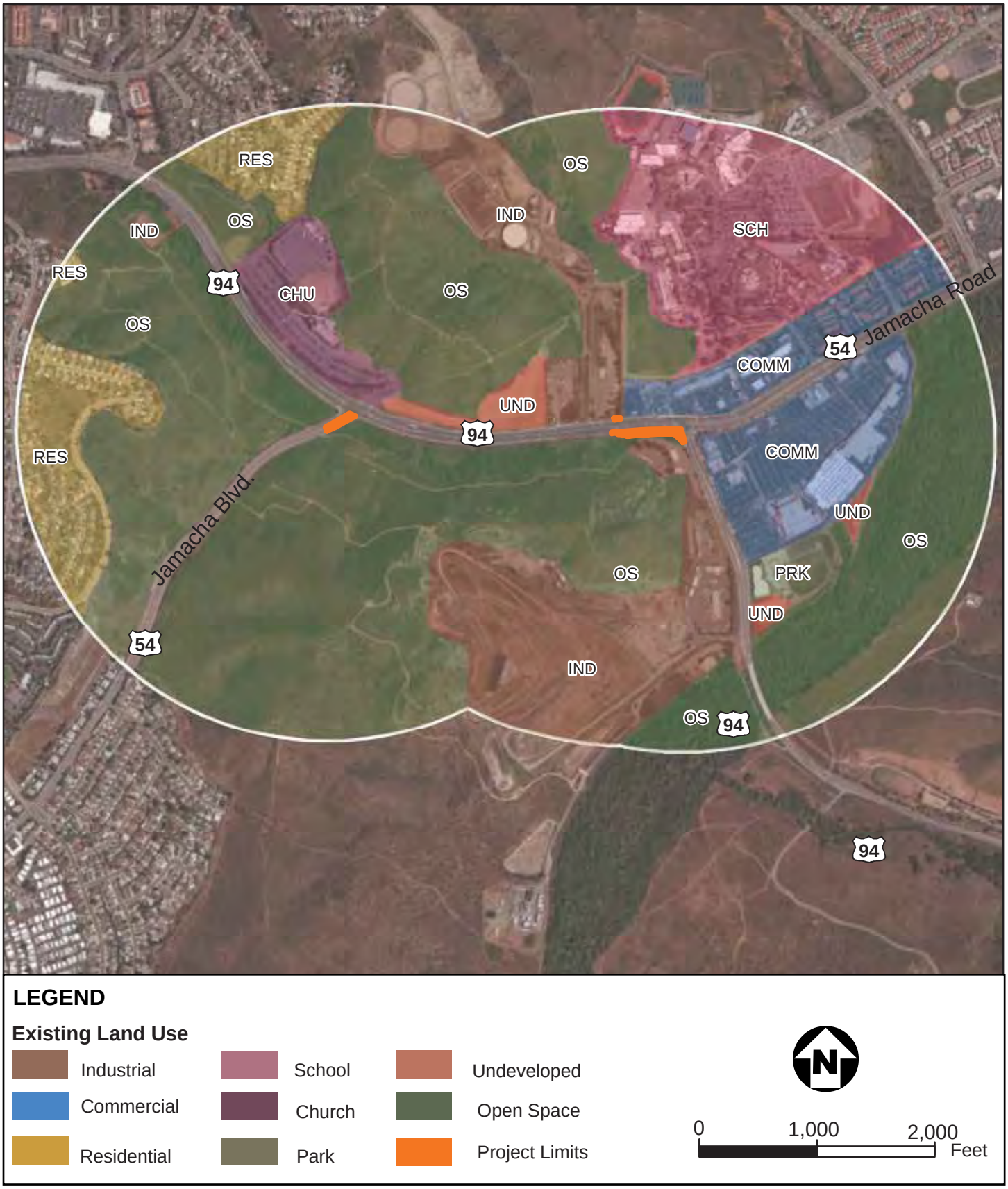


Figure 2.1-3
Existing Land Uses at the SR-94/Jamacha Rd. and SR-94/Jamacha Blvd. Intersections

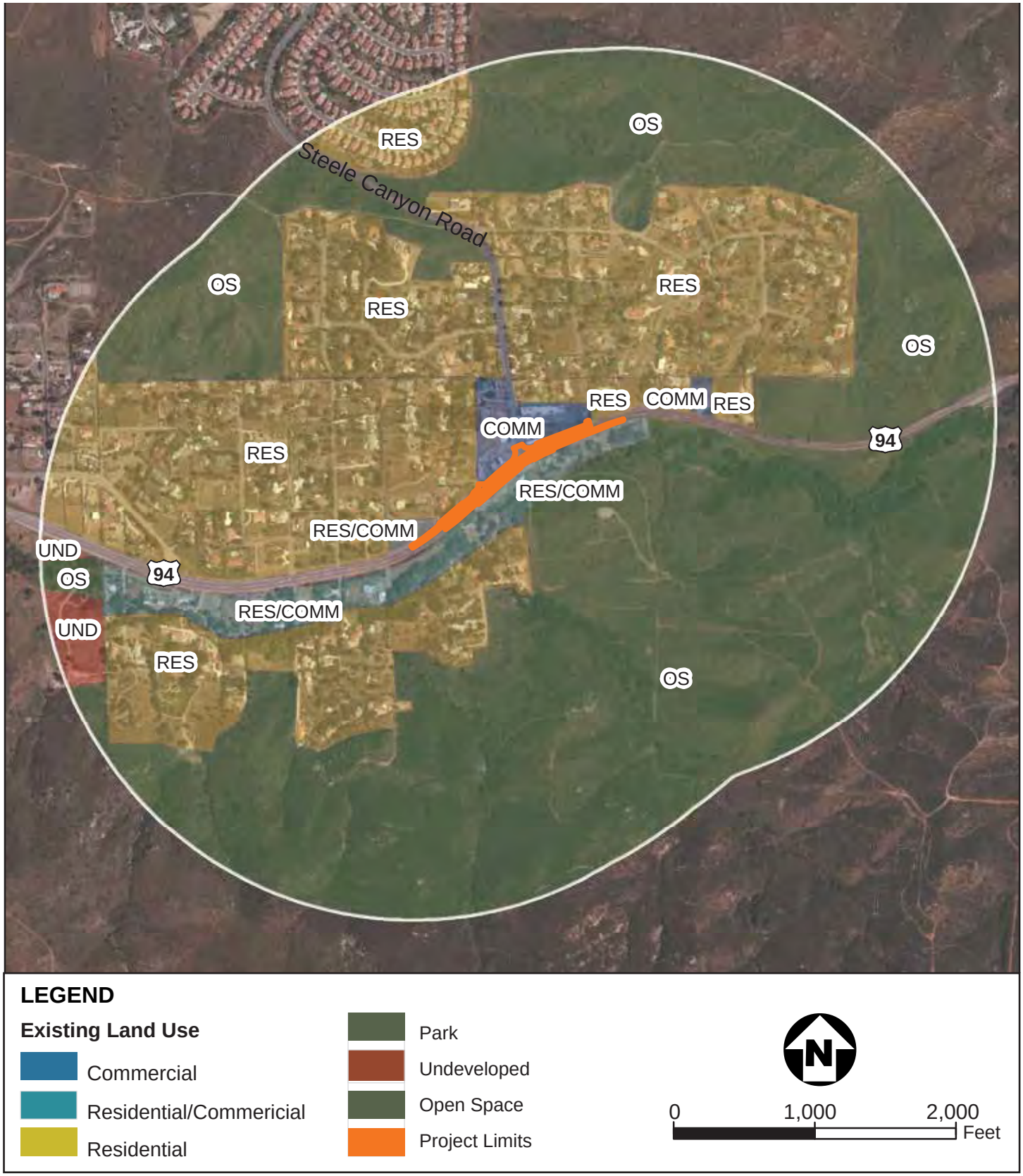


Figure 2.1-4
Existing Land Uses at the SR-94/Steele Canyon Road Intersection

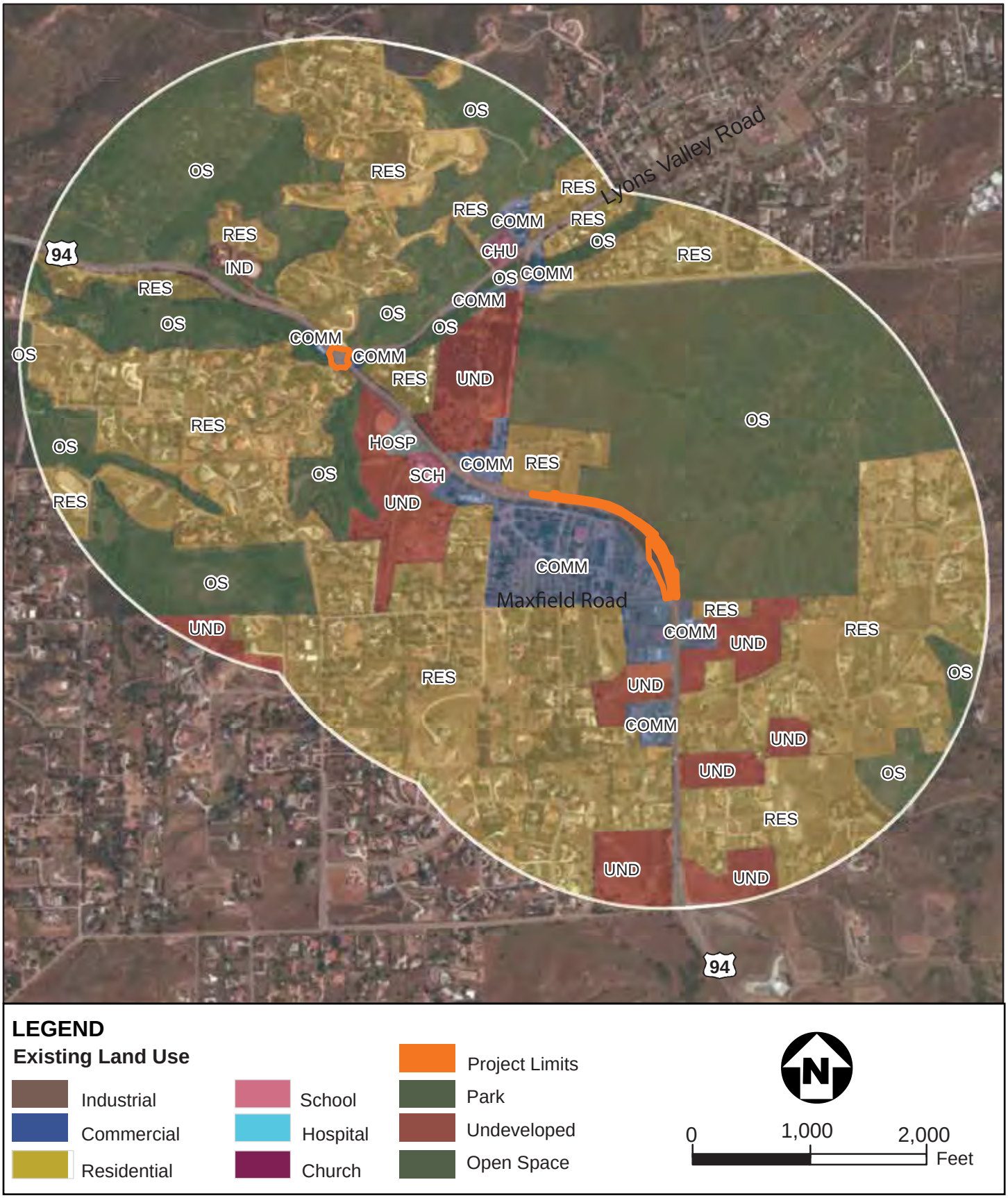


Figure 2.1-5
Existing Land Uses at the SR-94/Lyons Valley Rd. and SR-94/Maxfield Rd. Intersections

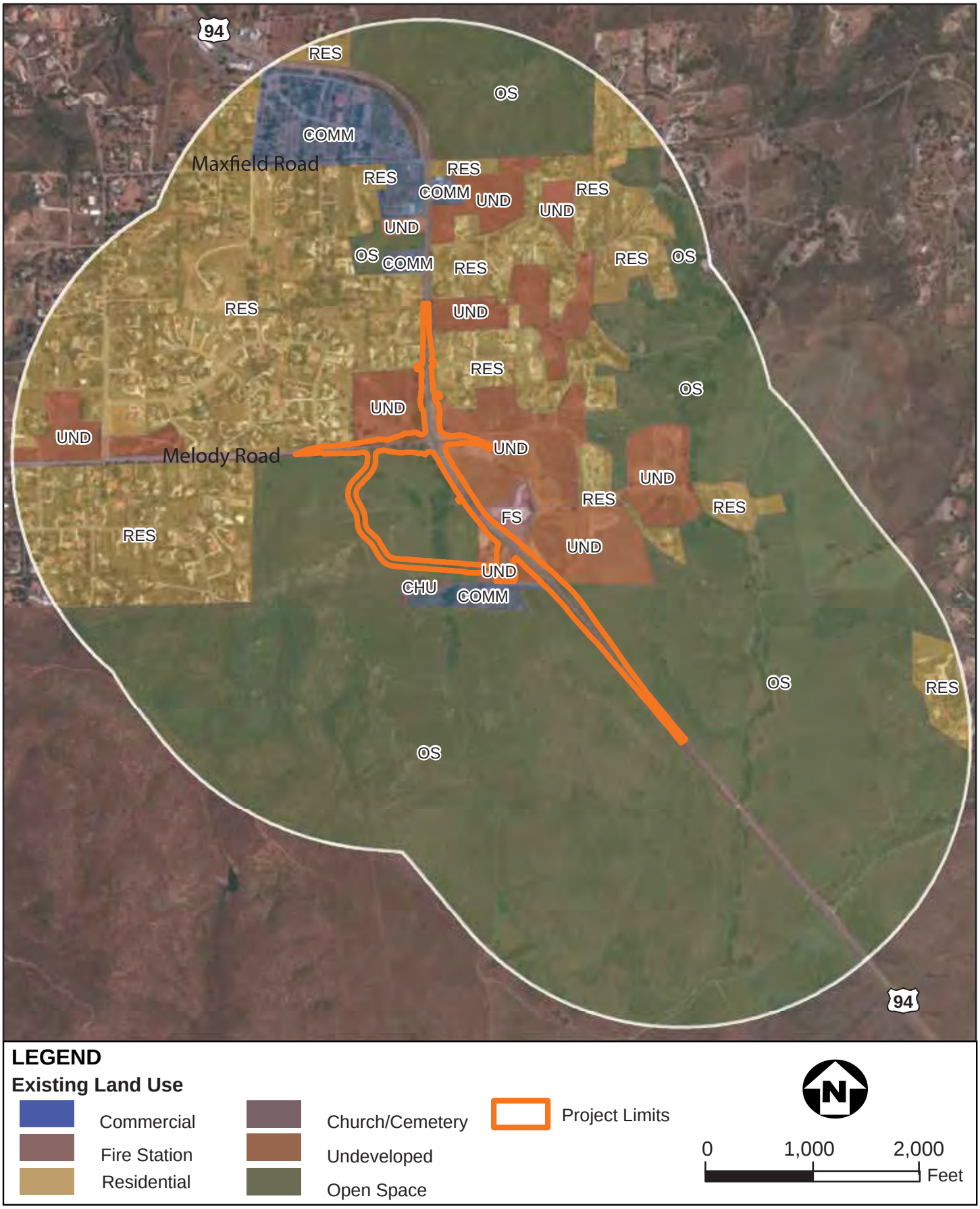


Figure 2.1-6
Existing Land Uses Near the Access Alignments Study Area

2.2 GROWTH

2.2.1 Regulatory Setting

CEQA requires the analysis of a project's potential to induce growth. The CEQA Guidelines (Section 15126.2[d]), require that environmental documents "…discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment...".

2.2.2 Affected Environment

The Proposed Project is located in areas ranging from primarily undeveloped areas to locations that are more urbanized. There are large amounts of undeveloped land in close proximity to the Proposed Project limits; however, this is deceptive as it relates to future growth potential because existing County zoning and preserve/reserve land holdings restrict the amount of growth that could occur on these lands. Additionally, it also appears that future growth potential exists on land surrounding the Proposed Project sites given the existence of sparse urban development; however, a majority of these lands contain Rural and Semi-Rural County land use designations, which limit density/intensity potential.

The most restrictive factors to future growth within the areas surrounding the Proposed Project limits are land holdings within the San Diego NWR, RJER and HCWA. Collectively, these land holdings account for approximately 19,530 acres of land that are restrictive to urban development. **Figure 2.1-2** shows the boundaries of the various preserves/reserves. As discussed in Section 2.1.2 Consistency with State, Regional, and Local Plans and Programs, uses are restricted in these areas to Tribal Lands, scientific, educational and limited recreational uses. The County's MSCP zoning throughout the area (especially the Hardline preserve designation) adds another restrictive layer to future growth.

While bordered by undeveloped land, three of the Proposed Project locations have zoning and preserve/reserve uses/designations that restrict growth. The vacant land bordering the SR-94/Jamacha Boulevard site to the northwest and southwest of the intersection contains an Open Space/Conservation County land use designation, as well as land within the San Diego NWR. Land immediately adjacent to the Access Road Alignments south of Melody Road, west of SR-94 contains the MSCP designation of Hardline Preserve, while land immediately adjacent to SR-94 south of the JIV Tribal Lands is within the RJER and HCWA. Lastly, San Diego NWR land is located to the south of the SR-94/Steele Canyon Road intersection.

The most urbanized of the Proposed Project sites are SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections. Adjacent land surrounding the SR-94/Jamacha Road intersection is built out with Commercial and Public/Semi-Public land uses, while land surrounding the SR-

94/Steele Canyon Road intersection is built out with Commercial and Semi-Rural Residential uses.

There is undeveloped land adjacent to SR-94/Jamacha Road and the Access Road Alignments. Northeast of the SR-94/Jamacha Road intersection is land zoned Neighborhood Commercial per the Valle de Oro Community Plan and Rancho San Diego Specific Plan. Land adjacent to the Access Road Alignments – south of Melody Road and east of SR-94 – is vacant land within the recently County designated Peaceful Valley Ranch development. This undeveloped land is designated for future residential and equestrian uses.

2.2.3 Environmental Consequences

Alternative 1-3: Build Alternatives

All Proposed Project improvements are designed to mitigate impacts resulting from future JIV Gaming Development Project traffic at Proposed Project intersections, and provide a safe access road to and from the JIV and SR-94. Additionally, the Tribal-State Compact between the State of California and the Jamul Indian Village requires the JIV to make good faith efforts to mitigate any and all significant adverse off-Reservation environmental impacts, but does not require that the JIV be successful in its good-faith efforts. In the case where the JIV makes a good faith effort to mitigate significant impacts per Section 10.8.2(b)(2) of the Compact, but is not successful in receiving approvals, it appears that the JIV may still proceed with its Gaming Development Project. Thus, the operation of the JIV Gaming Development Project is not dependent on approval of this Proposed Project. Therefore, the Proposed Project improvements would not be considered growth inducing.

The Non-Access Road Intersection improvements would not result in a change to accessibility as the improvements would be made to existing intersection facilities and are designed to maintain existing traffic routes on the State Highway. All of the Non-Access Road Intersections, except for the SR-94/Lyons Valley Road intersection, would have either the same or worse LOS (but operationally acceptable LOS) under Proposed Project conditions as under existing baseline conditions (see Traffic Tables 2.4-7, 2.4-35/36). No-excess capacity exists to cause growth inducement at the SR-94/Jamacha Boulevard, SR-94/Jamacha Road, SR-94/Steele Canyon Road, SR-94/Maxfield Road intersections. The improvement noted for the SR-94/Lyons Valley Road intersection results from the fact that the noted LOS under existing baseline conditions (LOS E/F) is reflective of the stop sign controlled approach from Lyons Valley Road onto SR-94. The existing baseline LOS E/F is not reflective of the flow of traffic through the intersection from the two SR-94 approaches. The current LOS for the SR-94 approaches is A. Following the Proposed Project facilities, LOS at this intersection would be the same or worse (but would continue to have an operationally acceptable LOS). Improving this intersection would result in a signal-controlled intersection, which would improve the overall LOS on all four approaches; however, the perception for SR-94 travelers approaching the intersection (which a majority of

nearby undeveloped land fronts) could actually be a "worsening" of LOS because of the signal control not previously experienced. Although the perception of travelers could be otherwise, the overall improved intersection LOS at the SR-94/Lyons Valley Road intersection is not expected to result in growth inducement.

Existing access to the JIV Tribal Lands historically has been accommodated by both Reservation Road and Daisy Drive (both located south of Melody Road). The selection of either Alternative 1: Reservation Road Access or Alternative 2: Daisy Drive Access would result in improvements to the existing access location, but would not change accessibility to the JIV Tribal Lands. Accessibility to the JIV Tribal Lands would change; however, if Alternative 3: Melody Road Access is selected because it would forgo the use of both Reservation Road and Daisy Drive for gaming traffic in favor of a new road accessed off of Melody Road. This new access road would travel through a vacant 87-acre parcel located west of SR-94 between Melody Road and the JIV Tribal Lands. To get to the new access route, both southbound and northbound SR-94 travelers would turn west on Melody Road and then south to the new access road.

Part of the improvements under Alternative 3: Melody Road Access would be to widen and improve Melody Road. There are three residentially zoned undeveloped parcels located off Melody Road west of the SR-94/Melody Road intersection (**Figure 2.1-6**). The SR-94/Melody Road intersection LOS would be the same in the future following construction of Alternative 3 improvements as exists today. The existing baseline LOS at the SR-94/Melody Road intersection is B. Following improvements and opening of the JIV Gaming Development Project, the SR-94/Melody Road intersection would have LOS B with higher delay than currently exists (see Traffic Tables 2.4-6 and 2.4-36). The JIV Gaming Development Project traffic would immediately consume excess capacity provided under the Alternative 3 improvements. If road capacity were the sole determinant of growth inducement, it could be expected that this growth would occur today since the same LOS, and a better delay, currently exists at the SR-94/Melody Road intersection. If growth in those areas does occur in the future, it most likely would be the result of some factor other than Proposed Project related roadway capacity increases (e.g., other infrastructure improvements like water/wastewater). Therefore, Alternative 3: Melody Road Access improvements are not expected to induce growth to the west of the SR-94/Melody Road intersection. The same could be said for the undeveloped Peaceful Valley Ranch and other undeveloped property located east of SR-94 around the SR-94/Melody Road intersection. This undeveloped land has most likely remained undeveloped (except for the relocated fire station) due to factors other than roadway capacity (e.g., inadequate water/ wastewater infrastructure).

Whether growth would be induced on the 87-acre parcel between Melody Road and the JIV Tribal Lands due to the new access road is considered very unlikely due to: (1) land surrounding the new access road on the 87-acre parcel is zoned to restrict future urban growth, and (2) the access road would be a single-purpose road (i.e., JIV Gaming Development Project traffic).

Additionally, the Willow Creek corridor meanders north-south through the eastern portion of the parcel, and a documented cultural site is situated west of the creek. These factors serve to restrict future development potential of the 87-acre parcel.

Pursuant to the San Diego County MSCP, the eastern half of the 87-acre parcel is a Biological Resource Core Area and designated as Hardline Preserve, which limits development by precluding grading, excavation, clearing vegetation, and construction of any building or structure. Development proposals on Hardline Preserve lands would require a Minor Amendment to the San Diego County MSCP, which would be considered by the San Diego County Planning Director. In the event that a Minor Amendment is denied, proposals would be required to seek a Major Amendment to the MSCP, which would be considered by the Board of Supervisors. The hilly land west of the Hardline Preserve is designated Take-Authorized Areas, which requires any development proposal to meet the requirements of the BMO and conformance with the terms of the MSCP Subarea Plan. San Diego County would have the final say as to what type of development occurs on the 87-acre parcel since any urban development would require a discretionary permit and requisite CEQA review to secure development entitlements. The San Diego County MSCP restriction on land use, and the design of the Melody Road Access Alignment as a single-purpose roadway, makes it highly unlikely that the Melody Road Access Alignment would result in growth inducement on the 87-acre parcel.

It could be speculated that construction of the access road through the 87-acre parcel could result in Tribal interest to have the 87-acre parcel taken into federal trust status, which would remove San Diego County land use authority resulting in future growth. This is unlikely given that the Tribe has previously proposed to take the parcel into federal trust with a roadway developed similar to what is shown under the Melody Road Access Alignment. This fee-to-trust request was removed by the Tribe.

The JIV Gaming Development Project is a commercial enterprise recently approved on tribal land south of Melody Road surrounded by unincorporated San Diego County. The question of growth on the JIV has been taken up and decided as part of the Final Tribal EE conducted by the JIV in early 2013. In summary, the commercial growth planned for the JIV would occur, and is occurring, with or without the Proposed Project improvements. No additional development in the area dependent upon the proposed road improvements is known. To the contrary, exterior constraints on development due to existing open space areas protected in perpetuity, as well as restrictive land use designations, apply to surrounding parcels. As a result, it is not reasonably foreseeable that the Proposed Project improvements would induce growth and no additional analysis is necessary.

Alternative 4: No Project Alternative

No physical improvements would result from Alternative 4: No Project Alternative; therefore, Alternative 4 would not result in a growth impact.

2.2.4 Avoidance, Minimization and Mitigation Measures

No avoidance, minimization and mitigation measures are required.

2.3 COMMUNITY CHARACTER AND COHESION

2.3.1 Regulatory Setting

Under CEQA, an economic or social change by itself is not to be considered a significant effect on the environment. However, if a social or economic change is the result of a physical change, then social or economic change may be considered in determining whether the physical change is significant. Since this Proposed Project would result in physical change to the environment, it is appropriate to consider changes to community character and cohesion in assessing the significance of the Proposed Project's physical effects.

2.3.2 Affected Environment

The analysis within this subchapter is based, in part, on the Community Impact Assessment (CIA) prepared for the Proposed Project in June 2014. To analyze the affected environment and potential impacts on the local community, the CIA relied primarily on statistics prepared by the San Diego Association of Governments (SANDAG). As the regional growth management agency for the San Diego area, SANDAG is responsible for compiling demographic and economic statistics and regional growth forecasts. SANDAG's demographic statistics are based on the 2010 U.S. Census, augmented by annual population and housing estimates that are developed in cooperation with local agencies and the California Department of Finance.

Proposed Project improvements are located within the unincorporated communities of Jamul and Rancho San Diego. More specifically, the proposed non-access intersection improvements at the SR-94/Jamacha Boulevard and SR-94/Jamacha Road intersections are located within the Rancho San Diego neighborhood; and the non-access intersection improvements at SR-94/Steele Canyon Road, SR-94/Lyons Valley Road, SR-94/Maxfield Drive, and the Access Road Alignments, are located within the community of Jamul.

Community impacts would be primarily localized to the neighborhoods along and adjacent to the Proposed Project limits. The study area for analysis of the affected environment and potential impacts on the local community is defined by the community plan boundaries that encompass the Rancho San Diego and Jamul communities. These include the Valle de Oro Community Plan Area (CPA) and the Jamul/Dulzura Subregional Plan Area (SPA).

Demographic Profile of the Study Area

The study area encompasses the Valle de Oro CPA and the Jamul/Dulzura SPA, each with its own character and level of cohesion. Indicators that a community may have a high degree of cohesion may include: long average residency tenures; households of two or more people (a high percentage of single-person households tends to correlate with lower cohesion); single-family homes over higher density housing; frequent personal contact and community activity (e.g., at

community gathering places); ethnic homogeneity; and presence of the elderly. Wherever possible, conclusions regarding neighborhood-level community cohesion were inferred from data available within the community planning area.

Table 2.3-1 presents a demographic profile of the study area, in addition to providing comparative data for San Diego County as a whole. The portion of the study area within the Valle do Oro CPA contains a mix of residential and commercial uses at varying intensities with an overall suburban character. The Jamul/Dulzura SPA is rural and characterized by mostly single-family residential uses on large lots interspersed with commercial uses and large areas of open space and undeveloped land. In general, the area residents tend to be older and less ethnically diverse, with substantially higher median household incomes compared to County averages, as discussed below.

TABLE 2.3-1
COMMUNITY IMPACT STUDY AREA AND SAN DIEGO COUNTY POPULATION AND HOUSING CHARACTERISTICS

Characteristic	Valle de Oro CPA	Jamul/Dulzura SPA	San Diego County
Population			
Total Population	40,548	10,746	3,095,313
Gender			
Male	19,171 (47%)	5,992 (56%)	1,553,679 (50%)
Female	21,377 (53%)	4,754 (44%)	1,541,634 (50%)
Age Distribution			
Under 5	2,029 (5%)	367 (3%)	203,423 (7%)
5 to 19	7,665 (19%)	2,094 (20%)	617,840 (20%)
20-34	6,921 (17%)	1,732 (16%)	741,672 (24%)
35-54	11,625 (29%)	3,360 (31%)	851,337 (27%)
55-64	6,077 (15%)	1,743 (16%)	329,616 (11%)
65+	6,231 (15%)	1,450 (14%)	351,425 (11%)
Median Age	42.7	43.0	34.7
Median Household Income	$84,165	$101,350	$62,771
Population by Race and Ethnicity			
Non-Hispanic			
White	29,030 (72%)	6,877 (64%)	1,500,047 (48%)
Black/African American	1,821 (4%)	409 (4%)	146,600 (5%)
American Indian	142 (<1%)	78 (1%)	14,098 (<1%)
Asian and Pacific Islander	1,592 (4%)	209 (2%)	341,562 (11%)
All Other	1,459 (4%)	224 (2%)	101,658 (3%)
Hispanic	6,504 (16%)	2,949 (27%)	991,348 (32%)
Housing			
Total Housing Units	15,536	3,234	1,158,076
Housing Unit Type			
Single-family (detached)	11,149 (72%)	3,013 (93%)	561,890 (48%)
Attached Units	4,286 (28%)	125 (4%)	553,545 (48%)
Mobile Home/Others	101 (<1%)	96 (3%)	42,641 (4%)
Occupied Households	14,957 (97%)	3,148 (97%)	1,086,865 (94%)
Persons per Household	2.69	2.92	2.75

Population Demographics

Gender

Within the study area, the population within the Valle de Oro CPA has a marginally higher percentage of females than males. Conversely, the population within the Jamul/Dulzura SPA consists of more males than females. This slightly differs from the San Diego region as a whole, which is evenly distributed with approximately 50 percent males and 50 percent females.

Age

The median age within the Valle de Oro CPA and Jamul/Dulzura SPA is similar at 42.7 and 43.0, respectively. This is higher than the San Diego regional median of 34.5 years of age. Both the Valle de Oro CPA and Jamul/Dulzura SPA have a higher percentage of elderly populations compared to the region.

Race and Ethnicity

Based on the 2010 U.S. Census, the majority of the residents within the study area are White non-Hispanic; approximately 72 percent of the population in the Valle de Oro CPA consists of White non-Hispanic and approximately 64 percent of the population in the Jamul/Dulzura SPA is White non-Hispanic. The percentages of minority populations within both the Valle do Oro CPA and Jamul/Dulzura SPA are lower than the overall region.

Household Income

The median household income within the study area is higher than the region-wide median. Within the Valle de Oro CPA, the median income is $84,165 and $101,350 in Jamul/Dulzura SPA, compared to the region-wide median income of $62,771.

Housing Demographics

Household Size

The Valle de Oro CPA has a lower density of people per household than the San Diego region at 2.69 compared to 2.75, respectively. The Jamul/Dulzura SPA, however, has a higher density of people per household than the region at 2.92.

Housing Type

Within the study area, most of the residents live in single-family residences, which represent 72 percent of the housing stock in the Valle de Oro CPA and approximately 93 percent in the Jamul/Dulzura SPA. This is substantially higher than the regional average of approximately 48

percent. The amount of attached homes and mobile homes within the study area is substantially lower than the region as a whole.

Occupancy

The housing occupancy rate within the study area was 97 percent for both the Valle do Oro CPA and Jamul/Dulzura SPA in 2010, as compared to approximately 93 percent region wide.

Valle de Oro Community Plan Area

The Valle de Oro CPA encompasses approximately 19-square miles and is bounded by El Cajon to the north, La Mesa to the west, Spring Valley to the southwest, and Jamul to the south/southeast. The CPA includes several unincorporated communities: Casa de Oro, Mount Helix, Vista Grande Hills, and Rancho San Diego. Regional Access to the CPA is provided by SR-94 and SR-54.

The CPA contains a mix of residential and commercial uses. Existing residential development in the Mount Helix/Casa de Oro area occurs near Campo Road and SR-94, as well as on the slopes of Mount Helix and in areas to the east near Jamacha Road. The Rancho San Diego area contains single-family housing on smaller lots, as well as large-scale apartment, condominium, and senior-housing development adjacent to commercial areas and transportation corridors. The Vista Grande Hills area consists of low-density single-family development. In addition to the residential areas listed above, the CPA includes the following commercial areas: along Campo Road near Bancroft Drive, in the Casa de Oro Shopping District, in the Rancho San Diego Shopping District, neighborhood convenience shopping at Avocado Boulevard and Fuerte Drive, the Rancho San Diego commercial areas, and neighborhood commercial uses at Jamacha Road and Chase Avenue.

Based on the number of single-family residential homes, an average household size of greater than two, ethnic homogeneity, and the presence of an elderly population (see **Table 2.3-1**), the Valle de Oro CPA appears to have a moderately high level of community cohesion.

Jamul/Dulzura Subregional Plan Area

The Jamul/Dulzura SPA of San Diego County encompasses approximately 168-square miles generally extending south of Loveland Reservoir and the Sweetwater River, adjacent to and north of the U.S./Mexico border, and east of the Rancho San Diego neighborhood. Land within the Jamul/Dulzura SPA is characterized by rolling hills with flat, broad valleys. A portion of the Cleveland National Forest is located in the northeast portion of the plan area. There are several unincorporated rural communities within the Jamul/Dulzura SPA including Jamul, Steele Canyon, Dulzura, and Barrett Junction. Regional access to the SPA is provided by SR-94.

The Jamul community (which encompasses the access road alternatives and three of the five Non-Access Road Intersections) is located in the northwestern portion of the Jamul/Dulzura SPA. It is the largest community within the SPA (approximately 17 square miles) and houses a majority of the Subregion's population. Jamul is characterized mostly by rural residential uses and large open spaces, with two small nodes of strip commercial development. The trend of land use development/growth over the last two decades within the Jamul community has been residential development and associated commercial growth.

Partly as a result of this growth, the County has increased efforts to preserve habitat for endangered species and other natural resources. The Land Use Map for the Jamul/Dulzura SPA issued by the County in 2008 showed a shift in land use designations in the region east of the Proposed Project site from General Agriculture and Multiple Rural Use to Open Space and Rural Lands. Population growth is expected to center primarily in the Jamul Community, west and north of the proposed access road improvements. The County adopted the revised Jamul/Dulzura land use plan in August 2011.

Rural Commercial establishments exist within each residential node within the Jamul community. There are Rural Commercial uses at both the SR-94/Steele Canyon Road intersection and SR-94/Proctor Valley Road intersection. None of these uses include big-box retailers or regionally serving commercial uses.

Based on the number of single-family residential homes, average household size of greater than two, ethnic homogeneity, and presence of an elderly population (see **Table 2.3-1**) within the Jamul/Dulzura SPA, the SPA is characterized as having a moderately high level of community cohesion.

Community Facilities

A number of schools are located within the study area. There are four public schools located off of Lyons Valley Road: (1) Oak Grove Middle School, (2) Jamul Intermediate School, (3) Jamul Primary School, and (4) Jamul Kid's Club Preschool. All four of the schools are within the Jamul-Dulzura Union School District. The Taproot Montessori Preschool is located immediately southeast of the SR-94/Lyons Valley Road intersection. Steele Canyon High School is a Charter School located off SR-94 at Cougar Canyon Road, which is closest to the proposed SR-94/Steele Canyon intersection improvement. Jamacha Elementary School, which is within the Cajon Valley School District, is accessible from Steele Canyon Road north of the proposed SR-94/Steele Canyon Road intersection improvement. Schools near the Jamacha intersections include Hillsdale Middle School (within the Cajon Valley School District) and Monte Vista High School (within the Grossmont Union High School District). Additionally, Cuyamaca College, a community college within the Grossmont-Cuyamaca Community College District, is located in Rancho San Diego.

A number of churches are also located in the study area. Four churches are located off Lyons Valley Road north of the SR-94/Lyons Valley Road intersection: (1) Jamul Community Church, (2) St. Pius X Church, (3) The Church of Jesus Christ of Latter-Day Saints, and (4) Jamul Community Church. The Skyline Wesleyan Church is located on the north side of SR-94, across from the proposed SR-94/Jamacha Boulevard improvements.

The study area is also home to a mix of nature preserves, reserves, and reservoirs, which provide recreational opportunities to area residents and visitors. These areas include the Hollenbeck Canyon Wildlife Area, Rancho Jamul Ecological Reserve, Otay Mountain Ecological Reserve, Sycuan Peak Ecological Reserve, McGintry Mountain Ecological Reserve, Otay Reservoir, and Sweetwater Reservoir, as well as others. Additional recreational opportunities include golf courses, school fields, and stables/equestrian training centers.

Other community facilities in the study area include the Rancho San Diego Branch Library, which is part of the San Diego County library system, the Rancho San Diego Town Center shopping center, additional retail commercial uses, and the McGrath Family YMCA.

Transportation-related community facilities, including transit services, bicycle, and pedestrian facilities, are discussed in Section 2.4, Traffic and Transportation/Pedestrian and Bicycle Facilities.

Community Involvement

Development issues within the study area are frequently addressed through the Jamul/Dulzura Community Planning Group (CPG) and the Valle de Oro CPG. The CPGs are formal bodies that exist as a means for San Diego County to solicit local public input and recommendations on land use matters in their sphere of influence. Prior to County consideration of discretionary entitlements, the CPG addresses applications, holds public meetings and provides feedback to the County. Elected CPG members serve a 4-year term and meet once per month at area schools.

2.3.3 Environmental Consequences

Long-term Access Impacts

Non-Access Road Intersections

None of the proposed improvements would result in displacements of existing structures, or physical barriers within either the Valle de Oro or Jamul/Dulzura communities. Additionally, access to adjacent land uses would be maintained throughout and following the construction period. The Proposed Project improvements to the Non-Access Road Intersections would not divide the community. Improvements would occur at existing roadway intersections and approaches. Although road widening would occur along portions of some roadway segments

near these intersections, such widening would not bifurcate the community locales of the proposed improvements because (1) road widening would occur along existing road alignments that already traverse the community, and (2) the extent of widening would not substantially increase the width of the roadway segments to be widened such that it would represent a barrier (physical or psychological/social) within the community.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Alternative 1: Reservation Road Access Alignment: The transportation-related improvements proposed for the Reservation Road Access Alignment would facilitate traffic flow and improve traffic safety when compared to no improvements and the operation of the gaming facility currently being constructed on the JIV Tribal Lands. The proposed improvements would not create new physical geographic or social barriers that would impact community character given that these improvements, including lane widening, signalization bioswales, bus stops, and retaining walls would be located along existing alignments of SR-94 and County streets. The proposed improvements would not permanently disrupt established routes or access to abutting land uses.

Alternative 2: Daisy Drive Access Alignment: The Daisy Drive Access Alignment improvements would be constructed along or adjacent to existing roadway facilities, with the exception of the access route proposed through the four-acre parcel north of the JIV Tribal Lands, which would be constructed to connect SR-94 to JIV Tribal Lands. This parcel is currently being used as a staging area for the construction of the JIV Gaming Development Project. Area residents and travelers through the area would see a new access road to the JIV Tribal Lands; however, historical use of this property included a paved two-lane access road to the JIV Tribal Lands. Construction of this element of the Proposed Project would not result in the division of an existing community. The proposed improvements would not create new physical geographic or social barriers that would impact community character given that these improvements, including lane widening, signalization, bioswales, bus stops, and retaining walls would be located along existing alignments of SR-94 and County streets. The proposed improvements would not permanently disrupt established routes or access to abutting land uses.

Alternative 3: Melody Road Access Alignment: A new access road would be constructed through an undeveloped 87-acre parcel from Melody Road south to the JIV Tribal Lands. The new roadway segment from Melody Road south to the JIV Tribal Lands would not physically divide an established community because the proposed road alignment would travel through an undeveloped parcel located west of SR-94. The Melody Road Access Alignment improvements would be constructed along or adjacent to existing roadway facilities with the exception of the

access road proposed through the undeveloped 87-acre parcel located north of the JIV Tribal Lands. The proposed improvements would not permanently disrupt established routes or access to abutting land uses.

Alternative 4: No Project Alternative

The No Project Alternative would not result in improvements to SR-94 or area streets; therefore, no long term access impacts would result. Under the No Project Alternative, traffic congestion at the various intersections addressed within this document would deteriorate from existing conditions once the JIV Gaming Development Project is operational, because the proposed intersection improvements would not be implemented, which could adversely affect the existing community character.

Right-of-Way Acquisition and Easements

Non-Access Road Intersections

The Proposed Project improvements for the intersection of SR-94/Jamacha Boulevard would be entirely within the existing Caltrans ROW, while improvements for the intersections of SR-94/Jamacha Road, SR-94/Steele Canyon Road, SR-94/Lyons Valley Road, and SR-94/Maxfield Road would necessitate additional ROW, as identified in **Table 2.3.2**. The location of proposed acquisition areas are shown on **Figures 1-5** through **1-8**. Proposed acquisitions would be partial acquisitions.

TABLE 2.3.2
PROPOSED RIGHT-OF-WAY ACQUISITION:
NON-ACCESS ROAD INTERSECTIONS

Assessor Parcel Number	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
SR-94/Jamacha Road			
506-020-3400	21.46	0.02	0.09%
506-020-3500	4.23	0.26	6.15%
Total Estimated ROW Needed		0.28	
SR-94/Steele Canyon Road			
596-231-2300	0.585	0.004	0.68%
596-231-2500	1.26	0.10	7.94%
596-040-0200	1.98	0.09	4.55%
596-040-6900	2.28	0.09	3.95%
596-040-3900	0.93	0.09	9.68%
596-040-6800	14.66	0.04	0.27%
Total Estimated ROW Needed		0.41	

TABLE 2.3.2 cont.
PROPOSED RIGHT-OF-WAY ACQUISITION:
NON-ACCESS ROAD INTERSECTIONS

Assessor Parcel Number	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
SR-94/Lyons Valley Road			
596-070-6100	7.54	0.082	1.09%
Total Estimated ROW Needed		0.082	
SR-94/Maxfield Road			
596-180-0200	18.83	0.17	0.9%
596-180-0100	141.70	0.01	<0.01%
Total Estimated ROW Needed		0.18	

While the Proposed Project improvements for SR-94/Jamacha Road would require additional ROW on the south side of SR-94, they would occur on undeveloped land situated between SR-94 and an existing drainage way. Industrial and open space uses are located south of the drainage way. Land uses surrounding the median reconstruction, signal modification, and bioswale construction consist of commercial, open space, and industrial uses. Access to adjacent uses would be maintained during and after construction. In addition, a temporary easement of 0.05 acre would be needed for the construction of a retaining wall and culvert improvements south of SR-94 (refer to **Figure 1-5**). No acquisition, relocation, or related community impacts are expected from the temporary easements.

The additional ROW required at the SR-94/Steele Canyon intersection contains residential landscaping and paved commercial frontage. On the south side of SR-94, the ROW required would cause the loss of portions of the front setbacks and surface parking for existing local businesses fronting SR-94. This would necessitate the removal of a total of 23 of 59 existing parking spaces (approximately 39 percent) on the south side of SR-94. Even with removal of the parking spaces caused by the Proposed Project improvements, the remaining 36 spaces would meet San Diego County parking requirements for the businesses. Nonetheless, the landowner/business owner would be contacted prior to the Proposed Project being approved to reconfigure and/or provide replacement parking. The driveways providing access to these local businesses would remain functional as they would continue to provide access to interior parking and the land currently being used for Jamul Nursery. Because the accessibility to local goods and services within the local community at this location would not be impaired due to loss of available parking, no associated significant community impacts would occur. In addition, approximately 0.25 acre of temporary construction easements would be needed for construction of a retaining wall on the north side of SR-94 and reconstruction of driveways and parking areas

on both the north and south sides of SR-94 (refer to **Figure 1-6**). No acquisition, relocation, or related community impacts are expected from the temporary easements.

At the SR-94/Lyons Valley Road intersection, an additional 0.082-acre of ROW would be required to allow tree and/or brush removal. Vegetation would need to be removed along the south side of SR-94 in order to provide adequate sight distance to the new traffic signal (refer to **Figure 1-7**). Commercial and open space uses are located in the area. Vegetation removal would occur within an undeveloped area, and access to adjacent uses would be maintained during and after construction; no significant community impacts would occur.

The Proposed Project improvements for the SR-94/Maxfield Road intersection would require an additional 0.18-acre of ROW to accommodate the acceleration lane improvement. The 0.18-acre of land constitutes a very small portion of the two parcels, which measure 18.83 acres and 141.70 acres. No displacement of existing structures would occur with implementation of the Proposed Project improvements. Access to area streets and residential parcels would be maintained during and following construction. In addition, approximately 0.04 acre of temporary construction easements would be needed for reconstruction of an existing driveway located at the north-western end of the improvements (refer to **Figure 1-8**). No acquisition, relocation, or related community impacts are expected from the temporary easements.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Alternative 1: Reservation Road Access Alignment: The Reservation Road Access Alignment would require 5.63 acres of additional ROW in order to construct the Proposed Project improvements, as identified in **Table 2.3.3**. The needed ROW is located on 10 parcels adjacent to SR-94, Melody Road, and Peaceful Valley Ranch Road (refer to **Figure 1-9**). Proposed acquisitions would be partial acquisitions and would not result in the displacement of structures or the creation of sub-standard lots. Vehicular traffic that currently uses area roadways would continue to use the roadways in the future along the same routes that currently exist.

TABLE 2.3.3
PROPOSED RIGHT-OF-WAY ACQUISITION:
RESERVATION ROAD ACCESS ALIGNMENT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW Needed as % of Parcel Size
597-041-2600	8.02	0.03	0.37%
597-041-4400	1.36	0.12	8.82%
597-041-4000	1.36	0.24	17.65%
597-041-1500	5.62	0.01	0.18%
597-060-0200	28.85	2.49	8.63%
597-042-1300	10.34	0.38	3.68%
597-060-0500	86.03	0.53	0.63%
597-080-0500	1.54	0.03	1.95%
597-080-800	68.16	1.72	2.52%
597-160-0400	79.91	0.08	0.10%
Total Estimated ROW Needed		5.63	

Permanent easements required for the Reservation Road Access Alignment would include utility easements, drainage easements, and footing easements. A total of 0.08 acre would be required for utility easements, 0.10 acre would be required for drainage easements, and 0.50 acre would be required for footing easements for proposed retaining walls. Temporary easements would be acquired to allow for space to construct the improvements. A total of 0.66 acres of temporary easements would be required for this Access Road Alignment. Permanent and temporary easement locations are shown on **Figure 1-9**. No acquisition, relocation, or related community impacts are expected from the permanent or temporary easements.

Alternative 2: Daisy Drive Access Alignment: The Daisy Drive Access Alignments would require additional ROW ranging from 2.82 to 5.85 acres (depending on the Option) in order to construct the proposed improvements, as identified in **Table 2.3.4**. The needed ROW is located on parcels adjacent to SR-94, Melody Road, and Peaceful Valley Ranch Road (refer to **Figures 1-10**, **1-11**, and **1-12**). Proposed acquisitions would be partial acquisitions and would not result in the displacement of structures or the creation of sub-standard lots. Vehicular traffic that currently uses area roadways would continue to use the roadways in the future along the same routes that currently exist.

TABLE 2.3.4
PROPOSED RIGHT-OF-WAY ACQUISITION: DAISY DRIVE ACCESS ALIGNMENTS

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
Option 1 Full Footprint			
597-041-2600	8.02	0.01	0.12%
597-041-4400	1.36	0.09	6.62%
597-041-4000	1.36	0.24	17.65%
597-041-5800	1.82	0.09	4.95%
597-041-1500	5.62	0.13	2.31%
597-060-0200	28.85	2.86	9.91%
597-042-1300	10.34	0.41	3.97%
597-060-0500	86.03	0.63	0.73%
597-060-0400	4.35	0.33	7.59%
597-080-800	68.16	1.06	1.56%
Total Estimated ROW Needed		5.85	
Option 2 Reduced Footprint			
597-041-2600	8.02	0.03	0.37%
597-041-4400	1.36	0.12	8.82%
597-041-4000	1.36	0.24	17.65%
597-060-0200	28.85	2.59	8.98%
597-042-1300	10.34	0.34	3.29%
597-060-0400	4.35	0.52	11.95%
597-060-0500	86.03	0.60	0.70%
597-080-0400	4.66	0.03	0.64%
597-080-0500	1.54	0.03	1.95%
597-080-700	72.59	0.56	0.77%
597-080-800	68.16	0.41	0.60%
597-160-0400	79.91	0.07	0.09%
Total Estimated ROW Needed		5.54	
Option 3 Minimum Footprint			
597-041-4000	1.36	0.24	17.65%
597-060-0200	28.85	2.40	8.32%
597-042-1300	10.34	0.06	0.58%
597-060-0500	86.03	0.04	0.05%
597-080-0400	4.66	0.002	0.04%
597-080-0500	1.54	0.0007	0.05%
597-080-700	72.59	0.03	0.04%
597-080-800	68.16	0.05	0.07%
Total Estimated ROW Needed		2.82	

Permanent easements required for Alternative 2: Option 1 Full Footprint would include utility easements, drainage easements, and footing easements. A total of 0.01 acre would be required for utility easements, 0.06 acre would be required for drainage easements, and 0.47 acre would be required for footing easements for proposed retaining walls. Temporary easements totaling 0.75 acre would be needed to allow for space to construct the improvements under Alternative 2: Option 1. Permanent and temporary easement locations for Alternative 2: Option 1 are shown on **Figure 1-10**. No acquisition, relocation, or related community impacts are expected from the permanent or temporary easements.

Permanent easements required for Alternative 2: Option 2 Reduced Footprint would include utility easements (0.08 acre), drainage easements (0.09 acre) and footing easements for retaining walls (0.49 acre). Temporary easements totaling 0.75 acre would be needed to allow for space to construct the improvements. Permanent and temporary easement locations for Alternative 2: Option 2 are shown on **Figure 1-11**. No acquisition, relocation, or related community impacts are expected from the permanent or temporary easements.

Permanent easements required for Alternative 2: Option 3 Minimum Footprint would include utility easements (0.05 acre), drainage easements (0.38 acre) and footing easements for retaining walls (1.1 acres). Temporary easements totaling 0.50 acre would be needed to allow for space to construct the improvements. Permanent and temporary easement locations for Alternative 2: Option 3 are shown on **Figure 1-12**. No acquisition, relocation, or related community impacts are expected from the permanent or temporary easements.

Alternative 3: Melody Road Access Alignment: The Melody Road Access Alignment would require 11.10 acres of additional ROW in order to construct the proposed improvements, as identified in **Table 2.3.5**. The required ROW is located on 15 parcels adjacent to SR-94 Melody Road, and Peaceful Valley Ranch Road (refer to **Figure 1-13**). Proposed acquisitions would be partial acquisitions and would not result in the displacement of structures. Vehicular traffic that currently uses area roadways would continue to use the roadways in the future along the same routes that currently exist.

TABLE 2.3.5
PROPOSED RIGHT-OF-WAY ACQUISITION:
MELODY ROAD ACCESS ALIGNMENT

APN	Parcel Size (acres)	ROW Needed (acres)	ROW as % of Parcel Size
597-041-2500	3.61	0.002	0.06%
597-041-2600	8.02	0.05	0.62%
597-041-4400	1.36	0.15	11.03%
597-041-4000	1.36	0.24	17.65%
597-041-5800	1.82	0.14	7.69%

TABLE 2.3.5 cont.
PROPOSED RIGHT-OF-WAY ACQUISITION:
MELODY ROAD ACCESS ALIGNMENT

597-041-1500	5.62	0.13	2.31%
597-060-0200	28.85	2.87	9.95%
597-042-1300	10.34	0.68	6.58%
597-060-0500	86.03	4.49	5.22%
597-060-0400	4.35	1.26	28.97%
597-080-0400	4.66	0.11	2.36%
597-080-0500	1.54	0.10	6.49%
597-080-800	68.16	0.46	0.67%
597-080-700	72.59	0.37	0.51%
597-280-6700	0.990	0.05	5.05%
Total Estimated ROW		11.10	

Permanent easements required for the Melody Road Access Alignment would include utility easements (0.07 acre), drainage easements (0.08 acre) and footing easements for retaining walls (1.7 acres). Temporary easements totaling 0.62 acre would be needed to allow for space to construct the improvements. Permanent and temporary easement locations for the Access Road Alignment are shown on **Figure 1-13**. No acquisition, relocation, or related community impacts are expected from the permanent or temporary easements.

Alternative 4: No Project Alternative

The No Project Alternative would not result in improvements to SR-94 or area streets; therefore, no ROW acquisitions would occur, nor would any easements be established.

Long-term Visual Community Impacts

Non-Access Road Intersections

The visual change caused by the proposed non-access road intersection improvements would not significantly impact visual quality within the Proposed Project limits (see Section 2.6 Visual Resources/Aesthetics). Minor changes to intersections such as SR-94/Jamacha Boulevard and SR-94/Lyons Valley Road would be located primarily within the existing Caltrans ROW and would cause low to moderately-low visual change. Improvements for both intersections would fit within the context of the existing transportation facility. The proposed improvements at the SR-94/Jamacha Road, SR-94/Steele Canyon Road, and SR-94/Maxfield Road intersections would all result in an expansion of the existing transportation facilities; however, Section 2.6 Visual Resources/Aesthetics concluded that the changes at the SR-94/Jamacha Road and SR-94/

Steele Canyon Road intersections would be contextual with the roadway corridor. The change to the existing visual character of the SR-94/Maxfield Road intersection would be moderate based on the construction of a new retaining wall and some roadside grading, but associated visual impacts would be less than significant. At the SR-94/Steele Canyon intersection, the most prominent feature on the north side of the highway would be the 160-foot long, 5-foot high retaining wall located east of Canfield Road. This would not be considered a significant visual impact given the relatively low height (5-feet) of the wall and the commercial development within this area. The most prominent feature on the south side of the highway would be the visual change of the eastbound through-lane in close proximity to the commercial uses west of the Steele Canyon Road intersection. At the SR-94/Jamacha Boulevard and SR-94/Maxfield Road intersections, the proposed retaining wall and transit facilities would result in features that would be noticeable to vehicular travelers in this portion of the rural community; however, this change was determined to be a less-than-significant visual impact in Section 2.6 Visual Resources/Aesthetics. Visual community impacts associated with the Non-Access Road Intersections are considered less than significant.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Alternative 1: Reservation Road Access Alignment: As the southbound traveler approaches Melody Road, or as the northbound traveler approaches the JIV Tribal Lands, they would observe a density of built environment features not encountered since Jamacha Boulevard/Road – retaining walls, dedicated turn-lanes, through-lanes, widened shoulders and multiple signals within a short traveling distance. The access alignment improvements would continue a shift from rural residential to a more developed/built environment.

Retaining walls proposed along SR-94 and Melody Road would create new visual elements to the landscape, impacting the community character and cohesion. Visually, the retaining walls would contribute to the increased urbanization of the area from the current rural landscape adjacent to SR-94 to a more built environment. It should be noted that this transformation began with the residential development off of Melody Road and the fire station on the east side of SR-94, and continues with the construction of the JIV Gaming Development Project on the JIV Tribal Lands. While not physically dividing an existing community, the retaining walls would contribute to the increased urbanization of the rural community character and cohesion of this area to one of a more built environment, resulting in a potentially significant visual community impact. Avoidance, minimization, and mitigation measures are identified in Section 2.6 that would reduce visual impacts and this associated visual community impact to below a level of significance.

Alternative 2: Daisy Drive Access Alignment: Potential long-term visual impacts resulting from the Daisy Drive Access Alignments (Options 1-3) would generally be the same as described for the Reservation Road Access Alignment, which is less than significant with mitigation.

Alternative 3: Melody Road Access Alignment: Access to the Melody Road Access Alignment would be via existing SR-94 and Melody Road. Southbound SR-94 traffic would make a right-turn at Melody Road and travel to the new intersection and then turn left onto the adjacent 87-acre parcel at a newly constructed signalized intersection. No traffic would be required to travel through adjacent residential areas located north of Melody Road under this Access Road Alignment. However, existing residents located north and west along Melody Road, and travelers along Melody Road, would experience a shift from a primarily rural environment to a more built environment, both visually and in terms of traffic congestion along Melody Road. This shift would be counter to the rural community character the community currently experiences at this location.

Proposed retaining walls would add new visual elements to the landscape, impacting the community character and cohesion. The Melody Road Access Alignment would require seven retaining walls of up to 40 feet in height, with a combined length of approximately 4,000 feet. These retaining walls would be a new, visually dominant man-made element on the area landscape, offset from SR-94 and other area roadways on a currently undeveloped 87-acre parcel, which would be seen by area residents and travelers through the area. These retaining walls would contribute to the increased urbanization of the area from the current rural landscape adjacent to SR-94 to more of a built environment that began with the residential development off of Melody Road and the fire station on the east side of SR-94, and continues with the construction of the JIV Gaming Development Project on the JIV Tribal Lands at the southern end of what would be the Melody Road Access Alignment. While not physically dividing an existing community, the roadway and associated retaining walls under this Access Road Alignment would contribute to the increased urbanization of this area to one of a more built environment, resulting in a significant visual community impact. The avoidance, minimization, and mitigation measures identified in Section 2.6 would reduce the impact below a level of significance.

Alternative 4: No Project Alternative

The No Project Alternative would not result in improvements to SR-94 or area streets; therefore, no long term community visual impacts would occur.

Long-term Noise-related Community Impacts

Non-Access Road Intersections

A project that results in substantial noise increases could affect the character of the surrounding community. As discussed in Section 2.14, Noise, noise sensitive receptors in the vicinity of the non-access road intersection improvements would not be significantly impacted by traffic noise. No associated long-term noise-related community impacts would occur.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

As discussed in Section 2.14, Noise, noise-sensitive receptors in the vicinity of the Access Road Alignment improvements would not be significantly impacted by traffic noise. No associated long-term noise-related community impacts would occur.

Alternative 4: No Project Alternative

The No Project Alternative would not result in improvements to SR-94 or area streets; therefore, no long term noise related impacts would occur.

Project Benefits Related to Community Character and Cohesion

Non-Access Road Intersections

The improved transit facilities would provide alternative transportation options to the community around the Proposed Project site. The improved transit facilities at the south end of the Proposed Project site would be constructed within the existing roadway ROW, and would benefit community cohesion as pedestrian activity in and around the area would be encouraged.

Improvements to the existing transportation corridor would also benefit travelers through the area. The signal improvements at SR-94/Lyons Valley Road would benefit community cohesion as it would provide intersection traffic control at the adjacent Montessori school and gated residential community to the south. The new signal (with crosswalks) would also be a benefit to community cohesion by encouraging pedestrian activity in the area. The construction of the bioswale at the SR-94/Jamacha Road intersection would result in the elimination of this segment (approximately 55-feet) of a dirt walkway currently used as a sidewalk. The reconstruction of the walkway around the bioswale ensures that the improvement would not create a new division or physical barrier for pedestrians. Traffic would be accommodated through all intersections during and after construction. Access through the Proposed Project sites would be maintained during the nine-month construction period.

As discussed above, the Proposed Project improvements at the non-access road intersections would not result in a new facility that would divide an existing community, create new divisions or physical barriers within the community, or adversely affect the existing community character of the non-access road intersection locales. The proposed non-access road intersection improvements would not result in significant impacts related to community character and cohesion.

Alternative 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Transit and pedestrian use in the Proposed Project area would be improved with the construction of the Access Road Alignment. Two new bus stops at Reservation Road would be constructed under the Reservation Road Access Alignment. In addition, the improvements include a new signal at the SR-94/Melody Road and SR-94/ Reservation Road intersections, designed with pedestrian signal heads and push buttons to meet current ADA requirements. The bus stops and signal features would be a benefit to both transit users and pedestrians of the surrounding community.

As discussed above, the Reservation Road Access Alignment would not result in a new facility that would divide an existing community, or create new divisions or physical barriers within the community. However, the improvements would result in roadway improvements that would contribute to the increased urbanization of this part of the rural community to one of a more built environment. The avoidance, minimization, and mitigation measures identified in Section 2.6 would reduce impacts below a level of significance.

Community character and cohesion benefits would be the same as described for the Reservation Road Access Alignment. The Daisy Drive Access Alignment improvements would not result in a new facility that would divide an existing community, or create new divisions or physical barriers within the community. However, implementation of the proposed roadway improvements would contribute to the increased urbanization of this part of the rural community to one of a more built environment. The avoidance, minimization, and mitigation measures identified in Section 2.6 would reduce impacts below a level of significance.

Community character and cohesion benefits would be the same as described for the Reservation Road Access Alignment. The Melody Road Access Alignment improvements would not result in a new facility that would divide an existing community, or create new divisions or physical barriers within the community. However, implementation of the proposed roadway improvements would contribute to the increased urbanization of this part of the rural community to one of a more built environment. The avoidance, minimization, and mitigation measures identified in Section 2.6 would reduce impacts below a level of significance.

Alternative 4: No Project Alternative

The No Project Alternative would not result in improvements to SR-94 or area streets; therefore, no physical impacts would result. Under the No Project Alternative, traffic congestion at the various intersections addressed within this document would deteriorate from existing conditions once the JIV Gaming Development Project is operational, because the proposed intersection improvements would not be implemented, which could adversely affect the existing community character.

Construction Impacts

Non-Access Road Intersections

Implementation of the non-access road improvements would result in temporary construction-related impacts in the study area during the anticipated nine-month construction period. These include, but are not limited to, impacts related to temporary disruptions of vehicular or pedestrian access and mobility, increased noise, dust generation, lighting (during nighttime construction hours, if required), and visual changes to the existing landscape of the study area. Such impacts would be temporary and are not considered significant (please see Section 2.6 Visual Resources/Aesthetics, Section 2.12 Air Quality, and Section 2.14 Noise).

Construction-related impacts to the community would be minimized by the TMP to control temporary traffic impacts and construction BMPs (such as regular watering, covering exposed dirt piles, construction noise controls, and construction site maintenance). These construction-related community impacts would be temporary within each affected location in the study area. Furthermore, construction is not anticipated to impact the fundamental character of the study area, or the level of cohesion of its communities. Construction of the proposed improvements at the SR-94/Steele Canyon Road Intersection would result in the temporary displacement of a portion of the existing parking for businesses fronting SR-94. During the anticipated nine-month construction period for the improvements at this intersection, a total of 23 of the 59 existing parking spaces (approximately 39 percent) on the south side of SR-94 would be removed. The landowner/business owner would be contacted prior to the Proposed Project being approved to reconfigure and/or provide replacement parking. Access to the local businesses and temporary parking areas would be provided throughout the construction period. Proposed Project construction activities associated with the Non-Access Road Intersection improvements would not result in lasting adverse effects on community cohesion or changes to the essential character of the local neighborhoods.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives includes those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

The land adjacent to SR-94 and south of Melody Road within the Proposed Project limits is either undeveloped or open space and thus, no residences or businesses would be affected by construction work. There are six residential lots fronting SR-94 north of Melody Road; however, the residential structures are set-back from SR-94. The residences north of Melody Road could experience minor temporary inconveniences related to construction noise and dust emissions during the nine-month construction period; however, this inconvenience would be temporary and is not considered significant (please see Section 2.6 Visual Resources/Aesthetics, Section 2.12 Air Quality, and Section 2.14 Noise). Traffic delays for area residents would be experienced along Melody Road when the Willow Creek culvert is being reconstructed. During Phase 2 of construction, Melody Road would be closed to allow for the reconstruction of the roadway and the installation of the culvert. Residents would be temporarily detoured up/down Proctor Valley Road during this six-month construction phase. Although residents of the local community would experience temporary accessibility restrictions, existing travel routes would not be permanently affected. Proposed Project construction activities associated with the access road alternatives would not result in lasting adverse effects on community cohesion or changes to the essential character of the local neighborhoods. Overall, construction-related impacts to the community would occur, but would be minimized by a TMP to control temporary traffic impacts and construction BMPs (such as regular watering, covering exposed dirt piles, construction noise controls, and construction site maintenance).

Alternative 4: No Project Alternative

No improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no physical impacts would result. No construction-related impacts would result from Alternative 4: No Project Alternative.

2.3.4 Avoidance, Minimization and/or Mitigation Measures

With implementation of the avoidance, minimization, and mitigation measures identified in Section 2.6 Visual Resources/Aesthetics of this Final EIR, impacts related to community character and cohesion would be less-than-significant. No additional avoidance, minimization, and mitigation measures are required.

2.4 TRAFFIC AND TRANSPORTATION/PEDESTRIAN AND BICYCLE FACILITIES

2.4.1 Regulatory Setting

Caltrans, as assigned by the FHWA, directs that full consideration should be given to the safe accommodation of pedestrians and bicyclists during the development of roadway projects. It further directs that the special needs of the elderly and the disabled must be considered in all projects that include pedestrian facilities. When current or anticipated pedestrian and/or bicycle traffic presents a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility.

In July 1999, the U.S. Department of Transportation (USDOT) issued an Accessibility Policy Statement pledging a fully accessible multimodal transportation system. Accessibility is governed by the USDOT regulations (49 CFR Part 27) implementing Section 504 of the Rehabilitation Act (29 United States Code [USC] 794). FHWA has enacted regulations for the implementation of the 1990 Americans with Disabilities Act (ADA), including a commitment to build transportation facilities that provide equal access for all persons. These regulations require application of the ADA requirements to Federal-aid projects, including Transportation Enhancement Activities.

2.4.2 Affected Environment

This section is based on the 2014 Traffic Impact Study. The Traffic Impact Study includes a copy of all the sources used for all existing traffic count volumes used in the study.

Highway Facility Performance Evaluation Methods

The following sections describe the methodologies used for the preparation of the traffic impact study for the Proposed Project.

Highway Capacity Model Methodology

The 2000 Highway Capacity Model (HCM) published by the Transportation Research Board establishes procedures to evaluate highway facilities and rate their ability to process traffic volumes. The terminology "level of service" (LOS) is used to provide a qualitative evaluation based on calculations used to measure the performance of an intersection or roadway segment. The performance of an intersection is identified with a letter grade of A, B, C, D, E, or F with a letter grade of A representing the best conditions and a grade of F representing the worst conditions.

LOS for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the

hour analyzed. Intersections with different control types, specifically those with traffic signals and those without traffic signals (including those with stop signs) are evaluated differently:

- For a signalized intersection, the average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay.
- The LOS for non-signaled intersections is determined by the computed or measured control delay and is defined for each minor movement.
- At an all-way stop controlled intersection, the delay reported is the average control delay of the intersection. At a one-way or two-way stop controlled intersection, the delay reported represents the worst movement, which are typically the left-turns from the minor street (i.e., street with the least amount of traffic) approach.

The following provides a description of the existing street system within the vicinity of the study area. The study area includes all the intersection and roadway segments affected by the Proposed Project.

SR-94 begins near downtown San Diego as an eight-lane, access-controlled freeway. As it proceeds to the east, it narrows to a four-lane facility, with the freeway terminating at Avocado Boulevard. SR-94 then becomes a four-lane major roadway with signalized at-grade intersections between Avocado Boulevard and Jamacha Boulevard. In the relatively short section between Jamacha Boulevard and Jamacha Road, it is a six-lane road. South and east of Jamacha Road, it is a four-lane facility for approximately 1,300 feet before it transitions to a two-lane cross section. In the vicinity of the Proposed Project site, it is a two-lane, undivided, conventional highway that is also known as Campo Road. Bike lanes are currently not provided and curbside parking is prohibited along both sides of the roadway. Bus stops are provided intermittently along the roadway. SR-94 is part of the County of San Diego Bicycle Network System. SR-94 is approximately 26 feet wide with shoulders generally varying from 2 to 8 feet in the study area. The posted speed limit is 55 MPH. A two-way left-turn lane striping is provided along sections of the roadway where driveway access is denser. The segment between Cougar Canyon Road and Steele Canyon Road provides a two-way left-turn lane. SR-94 is classified as a prime arterial north of Melody Road and a major road south of Melody Road on the County of San Diego Circulation Element.

Jamacha Boulevard is constructed as a six-lane prime arterial south of SR-94. The posted speed limit along this corridor is 45 MPH. This roadway segment is built to its ultimate classification.

Jamacha Road is constructed as a six-lane prime arterial east of SR-94. The posted speed limit along this corridor is 45 MPH. This roadway segment is built to its ultimate classification.

Steele Canyon Road is currently constructed as a two lane undivided roadway, providing one travel lane in the north direction and one travel lane in the south direction. Steele Canyon Road is

signalized at SR-94, Jamul Drive and Willow Glen Drive. Steele Canyon Road has a roadway width of 45 feet with no shoulders provided. The posted speed limit on Steele Canyon Road is 45 MPH. Steele Canyon Road is classified as a collector road in the County of San Diego Circulation Element. Between Jamul Drive and Heatherwood Drive, a two-way left-turn lane is provided to facilitate access to adjacent properties along both sides of the road.

Lyons Valley Road is a two-lane undivided roadway. Bike lanes are provided and curbside parking is prohibited. Lyons Valley Road has a current roadway width of 35 feet with no shoulders provided. The speed limit is posted at 45 MPH.

Jefferson Road is a two-lane undivided roadway with a posted speed limit of 40 MPH. Currently, Jefferson Road has a roadway width of 30 feet with no shoulders provided. Jefferson Road is an unclassified roadway within the County of San Diego.

Melody Road is currently constructed as a two-lane undivided roadway providing one lane of travel per direction. No bike lanes or bus stops are provided and curbside parking is prohibited. Currently, Melody Road has a roadway width of 40 feet with no shoulders provided.

Reservation Road is an access roadway to the JIV site. This access roadway is constructed as a 2-lane road. This roadway is being evaluated as the main access driveway for the JIV Gaming Development Project under Alternative 1: Reservation Road Access.

Daisy Drive is a secondary access roadway to the JIV site. This roadway is being evaluated as the main access driveway for the JIV Gaming Development Project under Alternative 2: Daisy Drive Access.

Table 2.4-1 lists all of the intersections included in the study area and indicates how traffic is controlled at each (e.g. signalized, stop-controlled). As shown in **Table 2.4-1**, six study intersections are signalized and six study intersections are unsignalized. **Figure 2.4-1** displays the location of the study intersections. **Figure 2.4-2** shows the existing geometrics for the intersections within the study area.

Existing (2013) Baseline Traffic Conditions

Baseline Conditions for traffic are defined as the traffic volumes that exist at the time the Notice of Preparation (NOP) is prepared for the EIR. The NOP was issued by the State Clearinghouse on August 26, 2013.

TABLE 2.4-1
STUDY INTERSECTIONS

Intersection	Traffic Control (a)
1. SR-94 and Via Mercado	Signal
2. SR-94 and Jamacha Boulevard	Signal
3. SR-94 and Jamacha Road	Signal
4. SR-94 and Cougar Canyon Road	Signal
5. SR-94 and Steele Canyon Road	Signal
6. SR-94 and Lyons Valley Road	TWSC
7. SR-94 and Jefferson Road	Signal
8. SR-94 and Maxfield Road	OWSC
9. SR-94 and Melody Road	TWSC
10. SR-94 and Reservation Road	OWSC
11. SR-94 and Honey Springs Road	OWSC
12. SR-94 and Otay Lakes Road	OWSC

Notes:
TWSC = Two-way Stop Control
OWSC = One-way Stop Control

Existing peak-hour traffic counts for the intersections within Caltrans right-of-way were collected between 2009 and 2012. An evaluation of historical counts along SR 94 between the year 2001 and 2013 found that the existing peak-hour traffic counts were the best representation for baseline conditions within the study area. At the time the NOP was prepared for public circulation, traffic counts were reviewed and determined to adequately reflect the existing peak hour conditions at the intersections listed above. As such, the traffic analysis is based on those peak hour volume counts. Peak hour volumes are used to assess the performance of intersection operations because they represent the time of day when highest traffic volumes travel through the intersections. The intersections are evaluated at a morning (referred to as AM) and an afternoon (referred to as PM) peak hour. The peak hour represents the hour timeframe during the traffic counts with the highest volumes between 7-9 am and 4 to 6 pm.

Figure 2.4-3 illustrates the existing (2013) baseline peak-hour traffic volumes at the study intersections for a typical weekday. **Figure 2.4-4** illustrates existing (2013) baseline traffic volumes at the study intersections for a typical Friday and Saturday afternoon peak-hour periods.

Intersection Analysis

Tables 2.4-2 and **2.4-3** display the peak-hour LOS analysis results for the study intersections under Existing (2013) Baseline Conditions for all peak-hour periods analyzed. As shown in the tables, all intersections currently operate at LOS C or better during all peak periods analyzed, except for the following intersection:

- SR-94 (Campo Road) and Indian Spring Drive/Lyons Valley Road (LOS F weekday a.m. and p.m. peak-hour, LOS F Friday p.m. peak-hour and LOS E Saturday p.m. peak-hour)

The SR-94 (Campo Road) and Lyons Valley Road intersection is currently a two-way stop controlled intersection. During the peak-hour operations, considerable delay is experienced by vehicles entering the intersection from Lyons Valley Road as the through traffic along SR-94 (Campo Road) does not provide sufficient vehicle gaps needed to enter the intersection.

Intersection Analysis (ILV)

Tables 2.4-4 and **2.4-5** display the ILV analysis results for the Caltrans-owned signalized intersections under Existing (2103) Baseline Conditions for all peak hours analyzed. As shown in the table, all intersections along SR-94 (Campo Road) currently operate at below or approaching capacity during all peak periods.

Peak-Hour Arterial Analysis

Tables 2.4-6 and **2.4-7** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under Existing (2013) Baseline Conditions. As shown in Tables 2.4-10 and 2.4-11, SR-94 (Campo Road) between Via Mercado and Proctor Valley Road currently functions at LOS B or better.

Table 2.4-8 displays the peak-hour two-lane highway analysis along SR-94 (Campo Road) between Proctor Valley Road and Otay Lakes Road under Existing (2013) Baseline Conditions. The table shows the results of the weekday and weekend conditions. As shown in Table 2.4-12, all roadway segments within the study area currently function at LOS D under the Existing (2013) Baseline Conditions.

TABLE 2.4-2
EXISTING (2013) BASELINE PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Traffic Control	Peak Hour	Existing Baseline	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	AM	18.9	B
			PM	20.6	C
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	AM	15.3	B
			PM	29.6	C
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	AM	23.8	C
			PM	21.2	C
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	AM	17.9	B
			PM	10.2	B
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	AM	28.8	C
			PM	24.7	C
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	AM	589.6	F
			PM	73.6	F
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	AM	10.9	B
			PM	10.1	B
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	AM	12.3	B
			PM	14.8	B
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	AM	14.5	B
			PM	14.4	B
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	AM	Under this scenario, this intersection does not have conflicting movements.	
			PM		
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	AM	12.0	B
			PM	11.0	B
12	SR-94 (Campo Rd) & Otay Lakes Rd.	One-Way Stop	AM	11.2	B
			PM	12.3	B

Notes

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0 (a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

Bold values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better.

TABLE 2.4-3
EXISTING (2013) BASELINE PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Traffic Control	Peak Hour	Existing Baseline	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	FRI PM	19.9	B
			SAT PM	13.8	B
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	FRI PM	32.9	C
			SAT PM	15.8	B
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	FRI PM	24.5	C
			SAT PM	21.0	C
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	FRI PM	10.0	B
			SAT PM	13.5	B
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	FRI PM	27.3	C
			SAT PM	26.2	C
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	FRI PM	125.3	**F**
			SAT PM	40.7	**E**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	FRI PM	15.9	B
			SAT PM	13.8	B
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	FRI PM	14.2	B
			SAT PM	11.6	B
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	FRI PM	16.6	C
			SAT PM	12.9	B
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	FRI PM	Under this scenario, this intersection does not have conflicting movements.	
			SAT PM		
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	FRI PM	12.0	B
			SAT PM	10.5	B
12	SR-94 (Campo Rd) & Otay Lakes Rd.	One-Way Stop	FRI PM	12.6	B
			SAT PM	10.6	B

Notes

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0 (a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement. **Bold** values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better..

Bold values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better.

TABLE 2.4-4
EXISTING (2013) BASELINE ILV ANALYSIS (WEEKDAY)

Intersection		Peak hour	Existing Baseline	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	1253	Approaching Capacity
		PM	1240	Approaching Capacity
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	895	Below Capacity
		PM	1346	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	997	Below Capacity
		PM	1009	Below Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1094	Below Capacity
		PM	888	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1126	Below Capacity
		PM	999	Below Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	AM	646	Below Capacity
		PM	635	Below Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity

TABLE 2.4-5
EXISTING (2013) BASELINE ILV ANALYSIS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Existing Baseline	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	1170	Below Capacity
		SAT PM	964	Below Capacity
2	SR-94 (Campo Rd) & Jamacha Blvd.	FRI PM	1365	Approaching Capacity
		SAT PM	1076	Below Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	1058	Below Capacity
		SAT PM	916	Below Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	928	Below Capacity
		SAT PM	505	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	FRI PM	1036	Below Capacity
		SAT PM	608	Below Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	FRI PM	726	Below Capacity
		SAT PM	460	Below Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity

TABLE 2.4-6
EXISTING (2013) BASELINE PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (WEEKDAY)

Roadway Segment	Direction	AM Peak		PM Peak	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd	EB	48.9	A	45.4	A
	WB	41.7	B	42.3	A

Notes:

(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).

(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-7
EXISTING (2013) BASELINE PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Friday		Saturday	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd	EB	43.9	A	45.2	A
	WB	42.4	A	42.2	A

Notes:

(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).

(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-8
EXISTING (2013) BASELINE TWO-WAY TWO-LANE SEGMENT ANALYSIS

Highway Segment	Peak Hour	Existing Baseline		
		LOS (a)	Average Travel Speed (mph)	PTSF (b)
SR-94				
Proctor Valley Road to Melody Rd	Weekday AM	**D**	40.5	64.9%
	Weekday PM	**D**	40.5	64.8%
	Friday PM	**D**	40.2	68.7%
	Saturday PM	**D**	41.0	62.7%
Melody Road to Otay Lakes Rd	Weekday AM	**D**	44.4	63.4%
	Weekday PM	**D**	44.4	63.5%
	Friday PM	**D**	44.0	66.0%
	Saturday PM	**D**	45.0	61.1%

Notes:
(a) LOS is based on Average Travel Speed and Percent Time Spent Following per Chapter 12 of the 2000 Highway Capacity Manual.
(b) PTSF = Percent Time Spent Following
Bold values indicate intersections operating at LOS D, E or F and thus worse than Caltrans' target LOS C or better.

Pedestrian, Transit and Bike Facilities

Pedestrian

Paved pedestrian walkways do not exist in the Proposed Project limits with the exception of the east side of SR-94 just south of Jamacha Road for approximately 1,350 feet. There are two paved pedestrian waiting areas at the signalized corners of SR-94/Jamacha Boulevard and SR-94/Jamacha Road. The remainder of the intersections (SR-94/Steele Canyon Road, SR-94/Lyons Valley Road, SR-94/Maxfield, and SR-94/Melody Road) contain no paved pedestrian walkways. The access road locations do not contain paved pedestrian walkways. Pedestrian activity, to the extent undertaken in these locations, utilizes paved shoulders or adjacent dirt trails.

Transit

The San Diego County Metropolitan Transit System (MTS) provides transit service to the Jamul-Dulzura community. The Jamul-Dulzura community currently has no park-and-ride facilities. MTS Route 894 provides bus service to the Proposed Project limits via SR-94 Monday through Friday. MTS Route 894 does not provide service on Saturday, Sunday or Holidays. The stops for Route 894 include the following locations:

1. El Cajon Transit Center: located north of the Proposed Project limits,

2. Rancho SD Town Center: Located near the SR-94/Jamacha Road intersection at the San Diego Towne Center and Transit Center (stop is located inside the commercial development off SR-94),

3. Jamul: Located between Maxfield Road and Lyons Valley Road on SR-94 west of the SR-94/Proctor Valley Road intersection,

4. Dulzura: located south of the Proposed Project limits.

Bike Lanes

The Jamul-Dulzura community currently has one existing bikeway facility located on Lyons Valley Road from SR-94 to Jamul Drive. State Route 94 is part of the County of San Diego Bicycle Network System and on-highway bikeway facilities are proposed from Jamacha Boulevard to well south of the Tribal Lands. The proposed SR-94 bikeway facilities as identified in the County's Bicycle Transportation Plan as Priority 1, include the following:

1. Segment of SR-94 from Jamacha Boulevard to Steele Canyon Road - Class II bike lane facility;

5. Segment of SR-94 from Steele Canyon Road to Proctor Valley Road – Class III bike route ; and

6. Segment of SR-94 from Proctor Valley Road past the JIV Tribal Lands – "Share-the-Road" signage corridor.

Currently, bike lanes are not provided on SR-94 and curbside parking is prohibited along both sides of SR-94 for the entire length of this highway within the Proposed Project limits. Bike lanes are provided and curbside parking is prohibited on Lyons Valley Road.

2.4.3 Environmental Consequences

This section evaluates the Proposed Project's effects on the existing traffic volumes. The analysis evaluates different scenarios to identify the projected levels of service on the affected roadways and intersections not only within the context of the existing conditions, but also relative to conditions anticipated in the future when other developments in the area are expected to contribute to traffic in the area.

The purpose of evaluating different scenarios is to provide context and perspective of the Proposed Project's contribution to existing and future traffic conditions. The traffic analysis compares the projected traffic volumes with and without the Proposed Project. The context of each scenario is described in further detail below.

It should be noted that the Proposed Project consists of roadway and intersection improvements that were identified in a previous environmental document prepared for the JIV Gaming Development Project as off-site improvements necessary to mitigate traffic conditions created or contributed to by the JIV Gaming Development Project. Therefore, while the Proposed Project does not actually generate operational traffic, this analysis includes traffic from the JIV Gaming Development Project in analyzing conditions with the Proposed Project in order to meaningfully determine if the improvements would improve traffic conditions from the Gaming Development Project itself, as well as from conditions associated with other traffic on the roadways and intersections. Further, the traffic impact analysis scenarios include both weekday and weekend scenarios to ensure the analysis takes into account the difference in traffic volumes associated with the JIV Gaming Development Project operations on weekdays and weekends.

The conditions of the three traffic scenarios are based on the following:

Existing Conditions (2013)

Existing (2013) with JIV Gaming Development Project Conditions

This represents the traffic conditions of the existing street network with the addition of the JIV Gaming Development Project but without the intersection and access-road improvements associated with the Proposed Project.

Existing (2013) with JIV Gaming Development Project with Proposed Project Improvements Conditions

This represents the traffic conditions with the addition of the traffic volumes generated by the JIV Gaming Development Project and the Proposed Project intersection and access-road improvements.

Near Term Conditions (2015)

Near Term No Build Conditions

This scenario represents the traffic conditions of the street network assumed to be in place under the Near Term without the Proposed Project improvements. This scenario includes a projected traffic growth based on the addition of the JIV Gaming Development Project and other potential projects in the study area.

Near Term with Proposed Project Improvements Conditions

This scenario represents the Near Term traffic conditions (including traffic volumes generated by the JIV Gaming Development Project) with the addition of the Proposed Project improvements and thus demonstrates anticipated near term cumulative conditions.

Horizon Year Conditions (2035)

Horizon Year No Build Conditions

This scenario represents the traffic conditions of the street network to be in place under Horizon Year Conditions, consistent with the RTP, and is used to establish long-term, without Proposed Project conditions for evaluating cumulative impacts and the degree to which the Proposed Project would contribute to any such impacts. This scenario includes a projected traffic growth based on the addition of the JIV Gaming Development Project and other potential projects in the study area.

Horizon Year with Proposed Project Improvements Conditions

This scenario represents the Horizon Year traffic conditions with projected traffic growth based on the addition of the JIV Gaming Development Project and other potential projects in the study area and the addition of the Proposed Project improvements and thus demonstrates anticipated long term cumulative conditions.

Existing (2013) with JIV Gaming Development Project Conditions Analysis

Intersection Analysis

Figure 2.4-5 illustrates the Existing (2013) with JIV Gaming Development Project peak-hour traffic volumes at the study intersections for a typical weekday. **Figure 2.4-6** illustrates Existing (2103) with JIV Gaming Development Project traffic volumes at the study intersections for a typical Friday and Saturday peak-hour period.

Tables 2.4-9 and **2.4-10** display the peak-hour LOS analysis results for the study intersections under Existing (2013) with JIV Gaming Development Project traffic for all peak-hour periods analyzed.

TABLE 2.4-9
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Traffic Control	Peak Hour	Existing with JIV Gaming Development Project	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	AM	22.5	C
			PM	27.9	C
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	AM	16.2	B
			PM	37.2	**D**
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	AM	25.0	C
			PM	30.9	C
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	AM	19.5	B
			PM	15.0	B
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	AM	37.9	**D**
			PM	42.0	**D**
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	AM	ECL	**F**
			PM	659.0	**F**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	AM	13.3	B
			PM	13.6	B
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	AM	19.5	C
			PM	45.3	**E**
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	AM	24.1	C
			PM	34.6	**D**
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	AM	45.4	**E**
			PM	645.3	**F**
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	AM	13.1	B
			PM	12.3	B
12	SR-94 (Campo Rd) & Otay Lakes Rd.	One-Way Stop	AM	14.5	B
			PM	16.0	C

Notes

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0 (a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

Bold values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better.

TABLE 2.4-10
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Traffic Control	Peak Hour	Existing with JV Gaming Development Project	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	FRI PM	34.7	C
			SAT PM	18.0	B
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	FRI PM	40.6	**D**
			SAT PM	20.0	C
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	FRI PM	54.0	**D**
			SAT PM	32.3	C
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	FRI PM	16.3	B
			SAT PM	20.4	C
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	FRI PM	56.7	**E**
			SAT PM	42.5	**D**
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	FRI PM	ECL	**F**
			SAT PM	972.2	**F**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	FRI PM	17.2	B
			SAT PM	21.9	C
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	FRI PM	58.9	**F**
			SAT PM	32.3	**D**
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	FRI PM	77.8	**F**
			SAT PM	42.8	**E**
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	FRI PM	ECL	**F**
			SAT PM	ECL	**F**
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	FRI PM	14.2	B
			SAT PM	12.2	B
12	SR-94 (Campo Rd) & Otay Lakes Rd.	One-Way Stop	FRI PM	17.7	C
			SAT PM	14.2	B

Notes

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0 (a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

Bold values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

As shown in the tables, several intersections are expected to operate at LOS D or worse for at least one peak-hour period:

- Jamacha Boulevard and SR-94 (Campo Road) (LOS D weekday p.m. peak-hour and Friday p.m. peak-hour);
- SR-94 (Campo Road) and Jamacha Road (LOS D Friday p.m. peak-hour);
- Steele Canyon Road and SR-94 (Campo Road) (LOS D weekday a.m. and p.m. peak hours, LOS E Friday p.m. peak-hour, and LOS D Saturday p.m. peak-hour);
- Indians Spring Drive/Lyons Valley Road and SR-94 (Campo Road) (LOS F all peak-hour periods);
- SR-94 (Campo Road) and Maxfield Road (LOS E weekday p.m. peak-hour, LOS F Friday p.m. peak-hour, LOS D Saturday p.m. peak-hour);
- SR-94 (Campo Road) and Melody Road/Peaceful Valley Ranch Road (LOS D Weekday p.m. peak-hour, LOS F Friday p.m. peak-hour and LOS E Saturday p.m. peak-hour); and
- SR-94 (Campo Road) and Reservation Road (LOS E weekday a.m. peak-hour, LOS F weekday, Friday and Saturday p.m. peak hours).

Intersection Analysis (ILV)

Tables 2.4-11 and **2.4-12** display the ILV analysis results for the signalized intersections within the State Right of Way under Existing (2013) with JIV Gaming Development Project traffic conditions for all peak hours analyzed. As shown in the tables, all intersections along SR-94 (Campo Road) would operate at below or approaching capacity during all peak periods, except for the following intersections, which are expected to operate at above capacity conditions:

- SR-94 (Campo Road) & Jamacha Boulevard (Friday p.m. peak-hour); and
- SR-94 (Campo Road) & Steele Canyon (Friday p.m. peak hours).

Peak-Hour Arterial Analysis

Tables 2.4-13 and **2.4-14** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under Existing (2013) with JIV Gaming Development Project traffic conditions. As shown in the tables, the roadway segments would operate at LOS B or better with the addition of the JIV Gaming Development Project traffic during the weekday and weekend peak hours evaluated.

TABLE 2.4-11
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT ILV ANALYSIS (WEEKDAY)

Intersection		Peak Hour	Existing Plus JIV Gaming Development Project	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	1303	Approaching Capacity
		PM	1389	Approaching Capacity
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	960	Below Capacity
		PM	1466	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	1052	Below Capacity
		PM	1228	Approaching Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1230	Approaching Capacity
		PM	1292	Approaching Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1244	Approaching Capacity
		PM	1389	Approaching Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	AM	795	Below Capacity
		PM	1060	Below Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity

TABLE 2.4-12
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT ILV ANALYSIS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Existing Plus JIV Gaming Development Project	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	1362	Approaching Capacity
		SAT PM	1175	Below Capacity
2	SR-94 (Campo Rd) & Jamacha Blvd.	FRI PM	1517	**Above Capacity**
		SAT PM	1228	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	1391	Approaching Capacity
		SAT PM	1162	Below Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	1354	Approaching Capacity
		SAT PM	934	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	FRI PM	1517	**Above Capacity**
		SAT PM	1152	Below Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	FRI PM	1212	Approaching Capacity
		SAT PM	1000	Below Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-13
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PEAK-HOUR INTERSECTION ARTERIAL SEGMENT ANALYSIS (WEEKDAY)

Roadway Segment	Direction	AM Peak		PM Peak	
		Speed (a)	LOS b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd.	EB	47.7	A	41.5	B
	WB	38.3	B	41.6	B

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-14
EXISTING (2013) BASELINE WITH JIV GAMING DEVELOPMENT PROJECT PEAK-HOUR INTERSECTION ARTERIAL SEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Friday		Saturday	
		Speed (a)	LOS b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd.	EB	37.9	B	43.7	A
	WB	39.4	B	38.8	B

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

HCM Peak-Hour Two-Lane Highway Analysis

Table 2.4-15 displays the peak-hour two-lane highway analysis along SR-94 (Campo Road) between Proctor Valley Road and Otay Lakes Road under Existing (2013) with JIV Gaming Development Project traffic conditions. The table shows the results of the weekday and weekend conditions. The segment between Proctor Valley Road and Reservation Road is expected to operate at LOS E during all peak-hours analyzed with the exception of the Weekday a.m. peak-hour. During the Weekday a.m. peak-hour period, the segment of Melody Road to Reservation Road is expected to operate at LOS D. The segment between Reservation Road and Otay Lakes Road is expected to operate at LOS D during all peak-hour periods analyzed.

TABLE 2.4-15
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT TWO-WAY TWO-LANE HIGHWAY SEGMENT ANALYSIS

Highway Segment	Peak Hour	Existing Baseline		
		LOS (a)	Average Travel Speed (mph)	PTSF (b)
SR-94				
Proctor Valley Road to Melody Rd	Weekday AM	**E**	37.2	78.5%
	Weekday PM	**E**	34.5	84.8%
	Friday PM	**E**	31.1	89.6%
	Saturday PM	**E**	32.6	87.7%
Melody Rd to Reservation Rd	Weekday AM	**D**	41.2	76.8%
	Weekday PM	**E**	38.1	84.1%
	Friday PM	**E**	34.1	89.5%
	Saturday PM	**E**	36.0	87.2%
Reservation Rd to Otay Lakes Rd	Weekday AM	**D**	43.7	67.0%
	Weekday PM	**D**	44.4	63.5%
	Friday PM	**D**	42.5	74.4%
	Saturday PM	**D**	43.2	69.4%

Notes:
Bold values indicate intersections operating at LOS D, E or F.
(a) LOS is based on Average Travel Speed and Percent Time Spent Following per Chapter 12 of the 2000 Highway Capacity Manual.
(b) PTSF = Percent Time Spent Following

Near Term (2015) Conditions Analysis

This section provides a description of Near Term (2015) Conditions without the construction of the roadway improvements associated with the Proposed Project.

Road Network

No roadway network changes are assumed to take place under the Near Term Conditions scenario. The same roadway network conditions as described in existing (2013) conditions are assumed for this scenario.

Cumulative Projects

There are fifteen potential cumulative projects that could add traffic to the study area intersections. Other than the JIV Gaming Development Project itself, which was previously approved and is currently under construction, these cumulative projects are unrelated to the Proposed Project or the JIV Gaming Development Project. They have been previously proposed, and in many cases they have not been built or have not been built-out to their entitled density. These projects are included in the 2015 Near Term analysis because they represent development projects that would not be counted in the existing conditions, but are likely to be constructed before other roadway improvements assumed to be in place in the 2035 Horizon Year analysis are completed. These projects include the following:

1. ***Jamul Indian Village Gaming Project*** is a 203,000 square feet gaming facility that is currently under construction on a 6.2 acre Tribal Lands held in trust by the United States for the benefit of the Jamul Indian Village. The external boundaries of the Tribal Lands lie within the Community of Jamul, County of San Diego. This project is estimated to generate 9,000 ADT with 420 inbound/179 outbound trips during the AM weekday peak-hour and 533 inbound/472 outbound trips during the weekday PM peak-hour.

2. ***TPM 20550 (Morgan Minor Subdivision)*** proposes to construct 2 single-family estate homes. The project site is proposed north of the Procter Valley Road/Poplar Meadow Lane intersection. The project's anticipated daily traffic was manually calculated using SANDAG's *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (April 2002) ("SANDAG's Trip Rates") for estate homes. The project trips were calculated to generate 24 ADT with 1 inbound/1 outbound trip during the AM peak-hour and 1 inbound/1 outbound trip during the PM peak-hour.

3. ***TM 5154 RPL1 (Hendrix Subdivision)*** is located east of SR-94 (Campo Road) on Las Palmas Road. The project proposes to develop 5 single-family estate homes. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 60 ADT with 2 inbound/3 outbound trips during the AM peak-hour and 4 inbound/2 outbound trips during the PM peak-hour.

4. ***TM 5213 RPL2 (Mintz Subdivision)*** is located north of Skyline Truck Trail and east of Hidden Trail drive. The project proposes to develop approximately 25-acres of land into 10 single-family estate homes. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 120 ADT with 3 inbound/7 outbound trips during the AM peak-hour and 8 inbound/4 outbound trips during the PM peak-hour.

5. ***TM 5289 RPL2 (Jamul Highlands Subdivision)*** proposes to construct 25 single-family estate homes. The project site is proposed south of the Valley Road/Jamul Highlands Road intersection. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 300 ADT with 7 inbound/l9 outbound trips during the AM peak-hour and 21 inbound/9 outbound trips during the PM peak-hour.

6. ***TPM 20626*** proposes to construct 3 single-family estate homes. The project site is proposed on the west side of Procter Valley Road, just north of the Proctor Valley Road/Melody Road intersection. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 36 ADT with 1 inbound/2 outbound trips during the AM peak-hour and 3 inbound/1 outbound trips during the PM peak-hour.

7. ***TPM 20628 RPLI (Yacoo Minor Subdivision)*** proposes to construct 4 single-family estate homes. The project site is proposed on Schlee Canyon Road north of Procter Valley Road. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 48 ADT with 1 inbound/3 outbound trips during the AM peak-hour and 4 inbound/1 outbound trips during the PM peak-hour.

8. ***A Residential Development*** is proposed on land situated just east of the Proposed Project and south of Olive Vista Drive. The project proposes to develop 20 single-family estate homes. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 240 ADT with 6 inbound/13 outbound trips during the AM peak-hour and 17 inbound/7 outbound trips during the PM peak-hour.

9. ***TPM 20599 RPLI (Blanco Parcel Map)*** proposes to construct 4 single-family estate homes. The project site is proposed on the east side of SR-94, north of the Melody Road. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 48 ADT with l inbound/3 outbound trips during the AM peak-hour and 4 inbound/1 outbound trips during the PM peak-hour.

10. ***TPM 20868 (Stein Barth Minor Subdivision)*** is located just north of the Proposed Project and south of Olive Vista Drive. The project proposes to develop 2 single-family estate homes. The project trips were manually calculated using SANDAG's Trip Rates for

estate homes. The project is calculated to generate 24 ADT with 1 inbound/1 outbound trip during the AM peak-hour and 1 inbound/1 outbound trip during the PM peak-hour.

11. ***TPM 20594 (Pioneer Minor Subdivision)*** is located just west of the Proposed Project and north of Melody Lane. The project proposes to develop 3 single-family estate homes. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 36 ADT with 1 inbound/2 outbound trips during the AM peak-hour and 3 inbound/1 outbound trips during the PM peak-hour.

12. ***Otay Ranch -Village 19*** is located south west of the Proposed Project and south of Melody Lane. The project proposes to develop 20 single-family estate homes. The project trips were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 240 ADT with 6 inbound/13 outbound trips during the AM peak-hour and 17 inbound/7 outbound trips during the PM peak-hour.

13. ***Jamul Estates II*** is located just north east of the Proposed Project. The maximum allowable developable lots are 68 single-family estate homes based on the current zoning and for purposes of this EIR it is conservatively assumed that all 68 will be approved/built. Therefore, the project trips associated with such 68 homes were manually calculated using SANDAG's Trip Rates for estate homes. The project is calculated to generate 816 ADT with 20 inbound/46 outbound trips during the AM peak-hour and 57 inbound/24 outbound trips during the PM peak-hour.

14. ***Simpson Farms*** is generally located on the northeast corner of the SR-94 (Campo Road)/Jefferson Road intersection in the Jamul Community of San Diego County. The project proposes to develop 98 single-family estate homes and 115,000 square feet (sf) of commercial uses. Therefore, the project trips associated with this project were manually calculated using SANDAG's Trip Rates. The project trips were calculated to generate approximately 6,500 ADT with approximately 124 inbound/130 outbound trips during the AM peak-hour and 323 inbound/275 outbound trips during the PM peak-hour.

15. ***Peaceful Valley Ranch*** project entails the subdivision of 181.31-acres for an estate residential development including, 46 new estate residential lots, a 6.7-acre equestrian facility and a new joint-use fire and administration offices for the Rural Fire Protection District and the US Fish and Wildlife Services. The project is located east of SR-94 and would use the intersection of SR-94 and Melody Road as a single access point. The project trips associated with this project were manually calculated using SANDAG's Trip Rates. The total project is calculated to generate approximately 750 ADT with 43 inbound/46 outbound trips during the AM peak hour and 56 inbound/46 outbound trips during the PM peak hour.

Figures 2.4-7 illustrates the cumulative traffic trip generation for the study area intersections within the study area.

Traffic Volumes

Traffic volumes for the Near Term (2015) No Build Conditions were estimated by adding the near term cumulative project traffic to the Existing (2013) Baseline traffic volumes. In addition, to account for other projects not yet identified by Caltrans or the County of San Diego, a traffic volume growth rate was calculated for each movement and added to the existing traffic counts for a period of five years (2010 and 2015). The traffic volume growth rate varies by location and it is based on a linear extrapolation of traffic volumes between the Horizon Year 2035 volumes and Existing (2013) with JIV Gaming Development Project and other approved/pending cumulative project volumes.

Figure 2.4-8 shows Near Term (2015) No Build peak-hour volumes for a typical weekday. **Figure 2.4-9** shows the Near Term (2015) No Build peak-hour volumes for a typical Friday and Saturday.

Intersection Analysis

Tables 2.4-16 and **2.4-17** display the peak-hour LOS analysis results for the study intersections under Near Term (2015) No Build Conditions. As shown in the tables, the following intersections would operate at LOS D, E or F for at least one peak period analyzed:

- SR-94 (Campo Road) & Via Mercado (LOS D weekday a.m. peak-hour, LOS F weekday p.m. peak-hour, and LOS E Friday p.m. peak-hour);
- SR-94 (Campo Road) & Jamacha Boulevard (LOS E weekday p.m. peak-hour, and LOS D Friday p.m. peak-hour);
- SR-94 (Campo Road) & Jamacha Road (LOS D weekday a.m. peak-hour, LOS F weekday p.m. peak-hour, E Friday p.m. peak-hour and D Saturday p.m. peak-hour);
- SR-94 (Campo Road) & Cougar Canyon Road (LOS D weekday p.m. peak-hour);
- SR-94 (Campo Road) & Steele Canyon Road (LOS D weekday a.m. peak-hour, LOS F weekday p.m. peak-hour, and LOS E Friday p.m. peak-hour);
- SR-94 (Campo Road) & Lyons Valley Road (LOS F all peak-hour periods analyzed);

TABLE 2.4-16
NEAR TERM (2015) NO BUILD PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Traffic Control	Peak Hour	Near Term No Build	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	AM	44.2	**D**
			PM	91.7	**F**
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	AM	18.8	B
			PM	57.1	**E**
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	AM	36.1	**D**
			PM	94.2	**F**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	AM	34.7	C
			PM	45.6	**D**
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	AM	43.9	**D**
			PM	119.7	**F**
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	AM	ECL	**F**
			PM	ECL	**F**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	AM	53.2	**D**
			PM	61.1	**E**
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	AM	25.4	**D**
			PM	111.2	**F**
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	AM	43.5	**E**
			PM	179.9	**F**
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	AM	56.7	**F**
			PM	767.0	**F**
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	AM	16.8	C
			PM	17.2	C
12	SR-94 (Campo Rd) & Otay Lakes Rd.	One-Way Stop	AM	20.0	C
			PM	23.8	C

Notes:

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0

Bold values indicate intersections operating at LOS D, E, or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-17
NEAR TERM (2015) NO BUILD PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Traffic Control	Peak Hour	Near Term No Build	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	FRI PM	65.2	**E**
			SAT PM	32.6	C
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	FRI PM	52.4	**D**
			SAT PM	22.2	C
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	FRI PM	71.2	**E**
			SAT PM	41.5	**D**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	FRI PM	19.9	B
			SAT PM	9.5	A
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	FRI PM	69.5	**E**
			SAT PM	29.9	C
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	FRI PM	ECL	**F**
			SAT PM	1472.9	**F**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	FRI PM	41.9	**D**
			SAT PM	23.7	C
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	FRI PM	96.0	**F**
			SAT PM	40.1	**E**
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	FRI PM	109.1	**F**
			SAT PM	48.3	**E**
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	FRI PM	ECL	**F**
			SAT PM	ECL	**F**
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	FRI PM	22.8	C
			SAT PM	16.4	C
12	SR-94 (Campo Rd) & Otay Lakes Rd.	One-Way Stop	FRI PM	32.5	**D**
			SAT PM	18.2	C

Notes:

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0

Bold values indicate intersections operating at LOS D, E, or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

- SR-94 (Campo Road) & Jefferson Road (LOS D a.m. peak-hour, LOS E p.m. peak-hour, LOS D Friday p.m. peak-hour);
- SR-94 (Campo Road) & Maxfield Road (LOS D weekday a.m. peak-hour, LOS F weekday and Friday p.m. peak-hour, LOS E Saturday p.m. peak-hour);
- SR-94 (Campo Road) & Melody Road (LOS E weekday a.m. peak-hour, LOS F weekday p.m. and weekend Friday p.m. peak-hours, and LOS E Saturday p.m. peak-hour);
- SR-94 (Campo Road) & Reservation Road (LOS F all peak-hour periods analyzed); and
- SR-94 (Campo Road) & Otay Lakes Road (LOS D Friday p.m. peak-hour).

Intersection Analysis (ILV)

Tables 2.4-18 and **2.4-19** display the ILV analysis results for the Caltrans-owned signalized intersections under Near Term (2015) No Build Conditions for all peak hours analyzed. As shown in the tables, all intersections along SR-94 (Campo Road) would operate at below or approaching capacity during all peak periods, except for the following intersections, which operate at above capacity conditions:

- SR-94 (Campo Road) & Via Mercado (weekday a.m. and p.m. peak hours, Friday p.m. peak-hour);
- SR-94 (Campo Road) & Jamacha Boulevard (weekday p.m. peak-hour and Friday p.m. peak-hour);
- SR-94 (Campo Road) & Jamacha Road (weekday p.m. peak-hour);
- SR-94 (Campo Road) & Cougar Canyon Road (weekday p.m. peak-hour);
- SR-94 (Campo Road) & Steele Canyon Road (weekday a.m. and p.m. peak hours and Friday p.m. peak-hour); and
- SR-94 (Campo Road) & Jefferson Road (weekday p.m. peak hour and Friday p.m. peak-hour).

Peak-Hour Arterial Analysis

Tables 2.4-20 and **2.4-21** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under the Near Term (2015) No Build Conditions.

TABLE 2.4-18
NEAR TERM (2015) NO BUILD ILV ANALYSIS (WEEKDAY)

Intersection		Peak Hour	Near Term No Build	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	1537	**Above Capacity**
		PM	1727	**Above Capacity**
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	1267	Approaching Capacity
		PM	1631	**Above Capacity**
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	1210	Approaching Capacity
		PM	1684	**Above Capacity**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1484	Approaching Capacity
		PM	1697	**Above Capacity**
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1530	**Above Capacity**
		PM	1891	**Above Capacity**
7	SR-94 (Campo Rd) & Jefferson Rd	AM	1249	Approaching Capacity
		PM	1670	**Above Capacity**

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-19
NEAR TERM (2015) NO BUILD ILV ANALYSIS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Near Term No Build	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	1669	**Above Capacity**
		SAT PM	1404	Approaching Capacity
2	SR-94 (Campo Rd) & Jamacha Blvd.	FRI PM	1592	**Above Capacity**
		SAT PM	1291	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	1465	Approaching Capacity
		SAT PM	1281	Approaching Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	1420	Approaching Capacity
		SAT PM	968	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	FRI PM	1591	**Above Capacity**
		SAT PM	1197	Below Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	FRI PM	1684	**Above Capacity**
		SAT PM	1288	Approaching Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-20
NEAR TERM (2015) NO BUILD PEAK-HOUR ARTERIAL ANALYSIS (WEEKDAY)

Roadway Segment	Direction	AM Peak		PM Peak	
		Speed (a)	LOS b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd.	EB	45.2	A	24.6	**D**
	WB	35.5	B	33.8	C

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.
Bold values indicate intersections operating above capacity.

TABLE 2.4-21
NEAR TERM (2015) NO BUILD PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Friday		Saturday	
		Speed (a)	LOS b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd.	EB	31.6	C	44.9	A
	WB	34.6	B	39.0	B

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

As shown in the tables, the roadway segment would function at LOS C or better under the Near Term (2015) No Build Conditions, except for the following segment:

- SR-94 (Campo Road) eastbound between Via Mercado and Proctor Valley Road (LOS D weekday p.m. peak-hour).

<u>HCM Peak-Hour Two-Lane Highway Analysis</u>

Table 2.4-22 displays the peak-hour two-lane highway analysis along SR-94 (Campo Road) between Proctor Valley Road and Otay Lakes Road under Near Term (2015) No Build Conditions. As shown in the table, all roadway segments within the study area would function at LOS D or E for all peak hours analyzed.

TABLE 2.4-22
NEAR TERM (2015) NO BUILD TWO-HIGHWAY SEGMENT ANALYSIS

Highway Segment	Peak Hour	Near Term		
		LOS (a)	Average Travel Speed (mph)	PTSF (b)
SR-94				
Proctor Valley Road to Melody Rd	Weekday AM	**E**	35.9	81.9%
	Weekday PM	**E**	32.8	87.4%
	Friday PM	**E**	31.3	89.3%
	Saturday PM	**E**	33.2	86.8%
Melody Rd to Project Driveway	Weekday AM	**D**	41.3	76.6%
	Weekday PM	**E**	32.8	87.4%
	Friday PM	**E**	35.5	87.9%
	Saturday PM	**E**	37.2	85.5%
Project Driveway to Otay Lakes Rd	Weekday AM	**D**	43.1	69.7%
	Weekday PM	**D**	42.6	71.9%
	Friday PM	**D**	42.1	73.2%
	Saturday PM	**D**	43.2	69.3%

Notes:
Bold values indicate intersections operating at LOS D, E or F.
(a) LOS is based on Average Travel Speed and Percent Time Spent Following per Chapter 12 of the 2000 Highway Capacity Manual.
(b) PTSF = Percent Time Spent Following

Horizon Year (2035) No Build Conditions Analysis

This section provides a description of Horizon Year (2035) Conditions without the Proposed Project.

Road Network

Per the County of San Diego's Mobility Element included in the approved General Plan, two roadway segment improvements were assumed to be completed under the Horizon Year (2035) Conditions:

- Completion of Proctor Valley Road as a 2-lane light collector from Chula Vista city limits to SR-94; and
- Realignment of Otay Lakes Road with the intersection of Honey Springs Road to form a four-way intersection at SR-94.

Traffic Volumes

Chapter 2 of the Traffic Impact Study (at page 2-2) provides a description of how the Horizon Year (2035) volumes were developed. **Figure 2.4-10** shows Horizon Year (2035) No Build peak-hour volumes for a typical weekday. **Figure 2.4-11** shows Horizon Year (2035) No Build volumes for typical Friday and Saturday afternoon peak hours.

Intersection Analysis

Tables 2.4-23 and **2.4-24** display the peak-hour LOS analysis results for the study intersections under Horizon Year (2035) No Build Conditions.

TABLE 2.4-23
HORIZON YEAR (2035) NO BUILD PEAK-HOUR INTERSECTION LOS (WEEKDAY)
TWO-LANE HIGHWAY
SEGMENT ANALYSIS

Intersection		Traffic Control	Peak Hour	Horizon Year No Build	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	AM	178.7	**F**
			PM	312.4	**F**
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	AM	29.6	C
			PM	84.5	**F**
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	AM	61.6	**E**
			PM	185.6	**F**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	AM	41.5	**D**
			PM	43.4	**D**
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	AM	50.9	**D**
			PM	124.4	**F**
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	AM	ECL	**F**
			PM	ECL	**F**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	AM	388.9	**F**
			PM	321.6	**F**
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	AM	26.7	**D**
			PM	217.9	**F**
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	AM	38.9	**E**
			PM	259.5	**F**
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	AM	87.1	**F**
			PM	ECL	**F**
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	As part of the County of San Diego's General Plan, the intersection of Honey Spring's Road would be realigned to form a four-way intersection with Otay Lakes.		
12	SR-94 (Campo Rd) & Otay Lakes Rd.	Signal	AM	20.1	C
			PM	30.4	C

Notes

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0 (a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

Bold values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-24
HORIZON YEAR (2035) NO BUILD PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Traffic Control	Peak Hour	Horizon Year No Build	
				Delay (a)	LOS (b)
1	SR-94 (Campo Rd) & Via Mercado	Signal	FRI PM	276.9	**F**
			SAT PM	146.5	**F**
2	Jamacha Blvd. & SR-94 (Campo Rd)	Signal	FRI PM	88.2	**F**
			SAT PM	36.6	**D**
3	SR-94 (Campo Rd) & Jamacha Rd.	Signal	FRI PM	160.3	**F**
			SAT PM	99.0	**F**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	Signal	FRI PM	23.9	C
			SAT PM	9.5	A
5	Steele Canyon Rd. & SR-94 (Campo Rd)	Signal	FRI PM	90.9	**F**
			SAT PM	31.5	C
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	Two-Way Stop	FRI PM	ECL	**F**
			SAT PM	1499.5	**F**
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	Signal	FRI PM	307.0	**F**
			SAT PM	140.5	**F**
8	SR-94 (Campo Rd) & Maxfield Rd.	One-Way Stop	FRI PM	256.7	**F**
			SAT PM	52.7	**F**
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	Two-Way Stop	FRI PM	352.2	**F**
			SAT PM	62.7	**F**
10	SR-94 (Campo Rd) & Reservation Rd.	One-Way Stop	FRI PM	ECL	**F**
			SAT PM	ECL	**F**
11	SR-94 (Campo Rd) & Honey Springs Rd.	One-Way Stop	As part of the County of San Diego's General Plan, the intersection of Honey Spring's Road would be realigned to form a four-way intersection with Otay Lakes.		
12	SR-94 (Campo Rd) & Otay Lakes Rd.	Signal	FRI PM	39.3	**D**
			SAT PM	17.5	B

Notes

(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0 (a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.

Bold values indicate intersections operating at LOS D, E, or F and thus worse than Caltrans' target LOS of C or better.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

As shown in the tables, each of the intersections would operate at LOS D, E, or F during one or more peak hours:

- SR-94 (Campo Road) & Via Mercado (LOS F all peak-hour periods analyzed);
- SR-94 (Campo Road) & Jamacha Boulevard (LOS F weekday and Friday p.m. peak-hour, and LOS D Saturday p.m. peak-hour);
- SR-94 (Campo Road) & Jamacha Road (LOS E weekday a.m. peak-hour, and LOS F weekday, Friday and Saturday p.m. peak-hours);
- SR-94 (Campo Road) & Cougar Canyon Road (LOS D weekday a.m. and p.m. peak-hours);
- SR-94 (Campo Road) & Steele Canyon Road (LOS D weekday a.m. peak-hour, and LOS F weekday and Friday p.m. peak-hours);
- SR-94 (Campo Road) & Lyons Valley Road (LOS F all peak-hour periods analyzed);
- SR-94 (Campo Road) & Jefferson Road (LOS F all peak-hour periods analyzed);
- SR-94 (Campo Road) & Maxfield Road (LOS D a.m. peak-hour period, and LOS F all other peak-hour periods analyzed);
- SR-94 (Campo Road) & Melody Road (LOS E weekday a.m. peak-hour, and LOS F weekday, Friday and Saturday p.m. peak-hours);
- SR-94 (Campo Road) & Reservation Road (LOS F all peak-hour periods analyzed); and
- SR-94 (Campo Road) & Otay Lakes Road (LOS D Friday p.m. peak-hour period)

Intersection Analysis (ILV)

Tables 2.4-25 and **2.4-26** display the ILV analysis results for the Caltrans-owned signalized intersections under Horizon Year (2035) No Build Conditions for all peak hours analyzed. As shown in the tables, all intersections along SR-94 (Campo Road) would operate at above capacity during one or more peak hours.

Peak-Hour Arterial Analysis

Tables 2.4-27 and **2.4-28** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under the Horizon Year (2035) No Build Conditions.

TABLE 2.4-25
HORIZON YEAR (2035) NO BUILD ILV ANALYSIS (WEEKDAY)

Intersection		Peak Hour	Horizon Year	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	2104	**Above Capacity**
		PM	2600	**Above Capacity**
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	1061	Below Capacity
		PM	1739	**Above Capacity**
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	1419	Approaching Capacity
		PM	1951	**Above Capacity**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1565	**Above Capacity**
		PM	1680	**Above Capacity**
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1604	**Above Capacity**
		PM	1904	**Above Capacity**
7	SR-94 (Campo Rd) & Jefferson Rd	AM	2098	**Above Capacity**
		PM	3678	**Above Capacity**

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-26
HORIZON YEAR (2035) NO BUILD ILV ANALYSIS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Horizon Year	
			ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	2540	**Above Capacity**
		SAT PM	2030	**Above Capacity**
2	SR-94 (Campo Rd) & Jamacha Blvd.	FRI PM	1781	**Above Capacity**
		SAT PM	1447	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	2150	**Above Capacity**
		SAT PM	1600	**Above Capacity**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	1523	**Above Capacity**
		SAT PM	960	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	FRI PM	1715	**Above Capacity**
		SAT PM	1212	Approaching Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	FRI PM	3025	**Above Capacity**
		SAT PM	2204	**Above Capacity**

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-27
HORIZON YEAR (2035) NO BUILD PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (WEEKDAY)

Roadway Segment	Direction	AM Peak		PM Peak	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd	EB	33.8	C	16.6	**E**
	WB	24.8	**D**	17.8	**E**

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.
Bold values indicate intersection operating at LOS D, E or F.

TABLE 2.4-28
HORIZON YEAR (2035) NO BUILD PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Friday		Saturday	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Proctor Valley Rd	EB	19.3	**E**	33.7	C
	WB	16.4	**E**	21.3	**D**

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.
Bold values indicate intersection operating at LOS D, E or F.

As shown in the tables, the roadway segment would operate at LOS D or E during the following peak-hour periods:

- Eastbound direction (LOS E weekday and Friday p.m. peak-hours); and
- Westbound direction (LOS D weekday a.m. and Saturday p.m. peak-hours, and LOS E weekday and Friday p.m. peak-hours)

HCM Peak-Hour Two-Lane Highway Analysis

Table 2.4-29 displays the peak-hour two-lane highway analysis along SR-94 (Campo Road) between Proctor Valley Road and Otay Lakes Road under Horizon Year (2035) No Build Conditions. As shown in the table, all roadway segments within the study area would function at LOS D or E.

TABLE 2.4-29
HORIZON YEAR (2035) NO BUILD
TWO-LANE HIGHWAY SEGMENT ANALYSIS

Highway Segment	Peak Hour	Horizon Year (2035) No Build		
		LOS (a)	Average Travel Speed (mph)	PTSF (b)
SR-94				
Proctor Valley Road to Melody Rd	Weekday AM	**E**	35.4	83.0%
	Weekday PM	**E**	30.7	90.1%
	Friday PM	**E**	29.6	91.3%
	Saturday PM	**E**	32.5	87.8%
Melody Rd to Project Driveway	Weekday AM	**D**	40.8	77.9%
	Weekday PM	**E**	38.0	84.3%
	Friday PM	**E**	34.8	88.7%
	Saturday PM	**E**	36.7	86.3%
Project Driveway to Otay Lakes Rd	Weekday AM	**E**	38.7	82.3%
	Weekday PM	**E**	38.3	83.3%
	Friday PM	**E**	36.6	86.1%
	Saturday PM	**D**	40.1	79.0%

Notes:
Bold values indicate intersections operating at LOS D, E or F.
(a) LOS is based on Average Travel Speed and Percent Time Spent Following per Chapter 12 of the 2000 Highway Capacity Manual.
(b) PTSF = Percent Time Spent Following

Existing (2013) Traffic Conditions with JIV Gaming Development Project Plus Proposed Project Analysis

This section summarizes the operations of the existing roadway circulation network with the addition of the traffic from the JIV Gaming Development Project along with the implementation of the Proposed Project intersection and roadway improvements.

Alternatives 1-3: Build Alternatives

Traffic Volumes

It is assumed that with the exception of Alternative 3: Melody Road Access, the Proposed Project would not change the traffic volumes and patterns along the study area, since both access points to the JIV Gaming Development site evaluated under Alternatives 1- 2 would be located along SR-94 south of Melody Road. For Alternative 3: Melody Road Access proposed improvements, however, the traffic volumes associated with the JIV Gaming Development Project would enter SR-94 (Campo Road) via Melody Road, changing the traffic distribution for the intersection of SR-94 and Melody Road. For this reason, peak-hour volumes at the SR-94 (Campo Road)/Melody Road/Peaceful Valley Ranch Road and the SR-94 (Campo Road)/Reservation Road intersections were adjusted for the analysis of Alternative 3: Melody Road Access only. The adjustment of traffic volumes was done to reflect the fact that all traffic related to the JIV Gaming Development Project would turn to and from Melody Road instead of a driveway at Daisy Drive or Reservation Road under Alternative 3: Melody Road Access conditions. It should be noted that Alternatives 1-3: Build Alternatives are the same with respect to the proposed improvements at Jamacha Boulevard, Jamacha Road, Steele Canyon, Maxfield Road and Lyons Valley Road.

Figure 2.4-12 illustrates the existing peak-hour traffic volumes at the study intersections for a typical weekday. **Figure 2.4-13** illustrates existing traffic volumes at the study intersections for a typical Friday and Saturday peak-hour periods. **Figure 2.4-14** illustrates the peak-hour traffic volume adjustment needed for the evaluation of the Alternative 3: Melody Road Access scenario, where the JIV Gaming Development Project related traffic would use Melody Road to access the SR-94.

Intersection Analysis

Tables 2.4-30 and **2.4-31** display the peak-hour LOS analysis results for the study intersections under Existing (2013) with JIV Gaming Development Project traffic plus Proposed Project Alternatives 1-2 conditions for all peak-hour scenarios analyzed. As shown in the tables, with the implementation of the Proposed Project improvements, every intersection within the study area

would operate at LOS D or better. Implementation of Alternatives 1-2 would result in a less-than-significant impact.

TABLE 2.4-30
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT WITH PROPOSED PROJECT ALTERNATIVES 1 AND 2 PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Peak Hour	Existing with JIV Gaming Development Project		Existing with JIV Gaming Project plus Proposed Project (ALT 1-2)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	AM	22.5	C	22.5	C	0.0
		PM	27.9	C	27.9	C	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	AM	16.2	B	18.0	B	1.8
		PM	37.2	**D**	28.9	C	-8.3
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	25.0	C	24.7	C	-0.3
		PM	30.9	C	28.5	C	-2.4
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	19.5	B	19.5	B	0.0
		PM	15.0	B	15.0	B	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	AM	37.9	**D**	19.0	B	-18.9
		PM	42.0	**D**	22.4	C	-19.6
6	Indian Springs Dr/Lyons Valley Rd. & SR-94 (Campo Rd)	AM	ECL	**F**	12.0	B	-
		PM	659.0	**F**	8.3	A	-650.7
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	AM	13.3	B	13.3	B	0.0
		PM	13.6	B	13.6	B	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	AM	19.5	C	13.2	B	-6.3
		PM	45.3	**E**	20.5	C	-24.8
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	AM	24.1	C	4.8	A	-19.3
		PM	34.6	C	6.2	A	-28.4
10	SR-94 (Campo Rd) & Reservation Rd.	AM	45.4	**D**	4.8	A	-40.6
		PM	645.3	**F**	7.0	A	-638.3
11	SR-94 (Campo Rd) & Honey Springs Rd.	AM	13.1	B	13.1	B	0.0
		PM	12.3	B	12.3	B	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	AM	14.5	B	14.5	B	0.0
		PM	16.0	C	16.0	C	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements
Bold values indicate intersections operating at LOS D, E or F. ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 second.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-31
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT WITH PROPOSED PROJECT ALTERNATIVES 1 AND 2 PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Existing with JIV Gaming Development Project		Existing with JIV Gaming Project plus Proposed Project (ALT 1-2)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	34.7	C	34.7	C	0.0
		SAT PM	18.0	B	18.0	B	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	FRI PM	40.6	**D**	28.9	C	-11.7
		SAT PM	20.0	C	19.8	B	-0.2
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	54.0	**D**	46.1	**D**	-7.9
		SAT PM	32.3	C	31.2	C	-1.1
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	16.3	B	16.3	B	0.0
		SAT PM	20.4	C	20.4	C	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	FRI PM	56.7	**E**	24.4	C	-32.3
		SAT PM	42.5	**D**	22.9	C	-19.6
6	Indian Springs Dr. /Lyons Valley Rd. & SR-94 (Campo Rd)	FRI PM	ECL	**F**	10.1	B	-
		SAT PM	972.2	**F**	8.2	A	-964.0
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	FRI PM	17.2	B	17.2	B	0.0
		SAT PM	21.9	C	21.9	C	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	FRI PM	58.9	**F**	23.0	C	-35.9
		SAT PM	32.3	**D**	17.9	C	-14.4
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	FRI PM	77.8	**E**	6.8	A	-71.0
		SAT PM	42.8	**D**	6.8	A	-36.0
10	SR-94 (Campo Rd) & Reservation Rd.	FRI PM	ECL	**F**	9.0	A	-
		SAT PM	ECL	**F**	7.7	A	-
11	SR-94 (Campo Rd) & Honey Springs Rd.	FRI PM	14.2	B	14.2	B	0.0
		SAT PM	12.2	B	12.2	B	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	FRI PM	17.7	C	17.7	C	0.0
		SAT PM	14.2	B	14.2	B	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements
Bold values indicate intersections operating at LOS D, E or F. ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

Table 2.4-32 and **2.4-33** display the peak-hour LOS analysis results for the study intersections under the Existing (2103) with JIV Gaming Development Project plus Proposed Project Alternative 3: Melody Road Access conditions for all peak-hour scenarios analysis. This analysis includes the evaluation of the Melody Road and the potential JIV gaming access intersection, which would be created under Alternative 3: Melody Road Access only. As with the Alternative 1-2 Project conditions, with the implementation of the Proposed Project improvements, every intersection within the study area would operate at LOS D or better. Implementation of Alternative 3: Melody Road Access would result in a less-than-significant impact.

Intersection Analysis (ILV)

Tables 2.4-34 and **2.4-35** display the ILV analysis results for the Caltrans-owned signalized intersections under Existing (2013) with JIV Gaming Development Project Traffic and Proposed Project Improvements Conditions for all peak hours analyzed. As shown in the table, all intersections along SR-94 (Campo Road) would operate at equal or better conditions than before Project conditions. Implementation of Alternative 3: Melody Road Access would result in a less-than-significant impact.

Peak-Hour Arterial Analysis

Tables 2.4-36 and **2.4-37** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under Existing (2013) with JIV Gaming Development Project Traffic and Proposed Project Improvements Conditions. As shown in the table, SR-94 between Via Mercado and Proctor Valley Road would continue to operate at LOS B or better after the construction of the proposed improvements. Implementation of Alternative 3: Melody Road Access would result in a less-than-significant impact.

<u>Alternative 4: No Project Alternative</u>

The No Project Alternative would not result in physical improvements to SR-94 or area streets.

TABLE 2.4-32
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PLUS PROPOSED PROJECT ALTERNATIVE 3: MELODY ROAD ACCESS PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Peak Hour	Existing with JIV Gaming Development Project		Existing with JIV Gaming Development Project plus Proposed Project (ALT 3)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	AM	22.5	C	22.5	C	0.0
		PM	27.9	C	27.9	C	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	AM	16.2	B	18.0	B	1.8
		PM	37.2	**D**	28.9	C	-8.3
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	25.0	C	24.7	C	-0.3
		PM	30.9	C	28.5	C	-2.4
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	19.5	B	19.5	B	0.0
		PM	15.0	B	15.0	B	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	AM	37.9	**D**	19.0	B	-18.9
		PM	42.0	**D**	22.4	C	-19.6
6	Indian Springs Dr. /Lyons Valley Rd. & SR-94 (Campo Rd)	AM	ECL	**F**	12.0	B	-
		PM	659.0	**F**	8.3	A	-650.7
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	AM	13.3	B	13.3	B	0.0
		PM	13.6	B	13.6	B	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	AM	19.5	C	13.2	B	-6.3
		PM	45.3	**E**	20.5	C	-24.8
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	AM	24.1	C	18.3	B	-5.8
		PM	34.6	C	19.4	B	-15.2
10	SR-94 (Campo Rd) & Reservation Rd.	AM	45.4	**E**	This intersection does not exist under this scenario.		
		PM	645.3	**F**			
11	SR-94 (Campo Rd) & Honey Springs Rd.	AM	13.1	B	13.1	B	0.0
		PM	12.3	B	12.3	B	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	AM	14.5	B	14.5	B	0.0
		PM	16.0	C	16.0	C	0.0
13	Melody Road & Casino Driveway	AM	15.2	B	15.2	B	0.0
		PM	10.2	B	10.2	B	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements

Bold values indicate intersections operating at LOS D, E or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-33
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PLUS PROPOSED PROJECT ALTERNATIVE 3: MELODY ROAD ACCESS PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Existing with JIV Gaming Development Project		Existing with JIV Gaming Development Project plus Proposed Project (ALT 3)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ(c)
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	34.7	C	34.7	C	0.0
		SAT PM	18.0	B	18.0	B	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	FRI PM	40.6	**D**	28.9	C	-11.7
		SAT PM	20.0	C	19.8	B	-0.2
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	54.0	**D**	46.1	**D**	-7.9
		SAT PM	32.3	C	31.2	C	-1.1
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	16.3	B	16.3	B	0.0
		SAT PM	20.4	C	20.4	C	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	FRI PM	56.7	**E**	24.4	C	-32.3
		SAT PM	42.5	**D**	22.9	C	-19.6
6	Indian Springs Dr. /Lyons Valley Rd. & SR-94 (Campo Rd)	FRI PM	ECL	**F**	10.1	B	-
		SAT PM	972.2	**F**	8.2	A	-964.0
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	FRI PM	17.2	B	17.2	B	0.0
		SAT PM	21.9	C	21.9	C	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	FRI PM	58.9	**F**	23.0	C	-35.9
		SAT PM	32.3	**D**	17.9	C	-14.4
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	FRI PM	77.8	**E**	26.3	C	-51.5
		SAT PM	42.8	**D**	18.4	B	-24.4
10	SR-94 (Campo Rd) & Reservation Rd.	FRI PM	ECL	**F**	This intersection does not exist under this scenario.		
		SAT PM	ECL	**F**			
11	SR-94 (Campo Rd) & Honey Springs Rd.	FRI PM	14.2	B	14.2	B	0.0
		SAT PM	12.2	B	12.2	B	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	FRI PM	17.7	C	17.7	C	0.0
		SAT PM	14.2	B	14.2	B	0.0
13	Melody Road & Casino Driveway	FRI PM	10.3	B	10.3	C	0.0
		SAT PM	7.8	A	7.8	A	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements

Bold values indicate intersections operating at LOS D, E or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-34
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PLUS PROPOSED PROJECT IMPROVEMENTS ILV ANALYSIS (ALT 1-3) (WEEKDAY)

Intersection		Peak Hour	Existing With JIV Gaming Project		Existing With JIV Gaming Project Plus Project (Alt 1-2)		Existing With JIV Gaming Project Plus Project (Alt 3)	
			ILV/hr Total	Capacity	ILV/hr Total	Capacity	ILV/hr Total	Capacity
1	SR 94 (Campo Rd) & Via Mercado	AM	1303	Approaching Capacity	1303	Approaching Capacity	1303	Approaching Capacity
		PM	1389	Approaching Capacity	1389	Approaching Capacity	1389	Approaching Capacity
2	SR 94 (Campo Rd) & Jamacha Blvd.	AM	960	Below Capacity	850	Below Capacity	850	Below Capacity
		PM	1466	Approaching Capacity	1184	Below Capacity	1184	Below Capacity
3	SR 94 (Campo Rd) & Jamacha Rd.	AM	1052	Below Capacity	1052	Below Capacity	1052	Below Capacity
		PM	1228	Approaching Capacity	1167	Below Capacity	1167	Below Capacity
4	SR 94 (Campo Rd) & Cougar Canyon Rd.	AM	1230	Approaching Capacity	1230	Approaching Capacity	1230	Approaching Capacity
		PM	1292	Approaching Capacity	1292	Approaching Capacity	1292	Approaching Capacity
5	SR 94 (Campo Rd) & Steele Canyon Rd.	AM	1244	Approaching Capacity	889	Below Capacity	889	Below Capacity
		PM	1389	Approaching Capacity	833	Below Capacity	833	Below Capacity
6	SR 94 (Campo Rd) & Lyons Valley Rd	AM	This intersection would not be signalized under this scenario		1248	Approaching Capacity	1248	Approaching Capacity
		PM			1145	Below Capacity	1145	Below Capacity
7	SR 94 (Campo Rd) & Jefferson Rd	AM	795	Below Capacity	795	Below Capacity	795	Below Capacity
		PM	1060	Below Capacity	1060	Below Capacity	1060	Below Capacity
9	SR 94 (Campo Rd) & Melody Rd	AM	This intersection would not be signalized under this scenario		628	Below Capacity	742	Below Capacity
		PM			915	Below Capacity	709	Below Capacity
10	SR 94 (Campo Rd) & Reservation Rd or Daisy Drive	AM	This intersection would not be signalized under this scenario		494	Below Capacity	This intersection would not be signalized under this scenario	
		PM			727	Below Capacity		

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-35
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PLUS PROPOSED PROJECT IMPROVEMENTS ILV ANALYSIS

Intersection		Peak Hour	Existing With JIV Gaming Development Project		Existing With JIV Gaming Development Project Plus Project (Alt 1-2)		Existing With JIV Gaming Development Project Plus Project (Alt 3)	
			ILV/hr Total	Capacity	ILV/hr Total	Capacity	ILV/hr Total	Capacity
1	SR 94 (Campo Rd) & Via Mercado	AM	1362	Approaching Capacity	1362	Approaching Capacity	1362	Approaching Capacity
		PM	1175	Below Capacity	1175	Below Capacity	1175	Below Capacity
2	SR 94 (Campo Rd) & Jamacha Blvd.	AM	1517	**Above Capacity**	1191	Below Capacity	1191	Below Capacity
		PM	1228	Approaching Capacity	986	Below Capacity	986	Below Capacity
3	SR 94 (Campo Rd) & Jamacha Rd.	AM	1391	Approaching Capacity	1304	Approaching Capacity	1304	Approaching Capacity
		PM	1162	Below Capacity	1162	Below Capacity	1162	Below Capacity
4	SR 94 (Campo Rd) & Cougar Canyon Rd.	AM	1354	Approaching Capacity	1354	Approaching Capacity	1354	Approaching Capacity
		PM	934	Below Capacity	934	Below Capacity	934	Below Capacity
5	SR 94 (Campo Rd) & Steele Canyon Rd.	AM	1517	**Above Capacity**	912	Below Capacity	912	Below Capacity
		PM	1152	Below Capacity	769	Below Capacity	769	Below Capacity
6	SR 94 (Campo Rd) & Lyons Valley Rd	AM	This intersection would not be signalized under this scenario		1367	Approaching Capacity	1367	Approaching Capacity
		PM			1255	Approaching Capacity	1255	Approaching Capacity
7	SR 94 (Campo Rd) & Jefferson Rd	AM	1212	Approaching Capacity	1212	Approaching Capacity	1212	Approaching Capacity
		PM	1000	Below Capacity	1000	Below Capacity	1000	Below Capacity
9	SR 94 (Campo Rd) & Melody Rd	AM	This intersection would not be signalized under this scenario		1088	Below Capacity	812	Below Capacity
		PM			887	Below Capacity	915	Below Capacity
10	SR 94 (Campo Rd) & Reservation Rd or Daisy Drive	AM	This intersection would not be signalized under this scenario		955	Below Capacity	This intersection would not be signalized under this scenario	
		PM			958	Below Capacity		

Notes:

<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity

Bold values indicate intersections operating above capacity.

TABLE 2.4-36
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PLUS PROPOSED PROJECT IMPROVEMENTS (ALTS 1-3) PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (WEEKDAY)

Roadway Segment	Direction	Existing With JIV Gaming Development Project		Existing With JIV Gaming Development Project Plus Proposed Project		
		Speed (a)	LOS (b)	Speed (a)	LOS (b)	Δ
AM Peak						
SR-94						
Via Mercado to Proctor Valley Rd	EB	47.7	A	46.2	A	-1.5
	WB	38.3	B	40.0	B	1.7
PM Peak						
SR-94						
Via Mercado to Proctor Valley Rd	EB	41.5	B	42.6	A	1.1
	WB	41.6	B	40.3	B	-1.3

Notes:

(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).

(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-37
EXISTING (2013) WITH JIV GAMING DEVELOPMENT PROJECT PLUS PROPOSED PROJECT IMPROVEMENTS (ALTS 1-3) PEAK-HOUR ARTERIALSEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Existing Plus JIV Gaming Development Project		Existing Plus JIV Gaming Development Project Plus Proposed Project		
		Speed (a)	LOS (b)	Speed (a)	LOS (b)	Δ
Friday PM						
SR-94						
Via Mercado to Proctor Valley Rd	EB	39.2	B	41.8	B	2.6
	WB	44.9	A	38.5	B	-6.4
Saturday PM						
SR-94						
Via Mercado to Proctor Valley Rd	EB	44.8	A	43.7	A	-1.1
	WB	44.0	A	39.7	B	-4.3

Notes:

(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).

(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

Near Term (2015) with Proposed Project Conditions Analysis

This section summarizes the operations of the street network assumed to be in place under the Near Term Conditions (including a projected traffic growth based on the addition of the JIV Gaming Development Project and other potential projects in the study area), with the addition of the roadway improvements proposed as part of the Proposed Project.

Alternatives 1-3: Build Alternatives

Traffic Volumes

It is assumed that with the exception of Alternative 3: Melody Road Access, the Proposed Project improvements would not change the traffic volumes and patterns along the study area since both access points to the JIV Casino site evaluated under Alternatives 1-2 would be located along SR-94 south of Melody Road. For Alternative 3: Melody Road Access proposed improvements, however, the traffic volumes associated with the JIV Gaming Development Project would enter SR-94 (Campo Road) via Melody Road changing the traffic distribution for the intersection of SR-94 and Melody Road. For this reason, peak-hour volumes at the SR-94 (Campo Road)/ Melody Road/Peaceful Valley Ranch Road and the SR-94 (Campo Road)/Reservation Road intersections were adjusted for Alternative 3: Melody Road Access only. The adjustment of traffic volumes was done so all traffic related to the JIV Gaming Development Project would turn to and from Melody Road instead of a driveway at Daisy Drive or Reservation Road. It should be noted that Alternatives 1-3 are the same with respect to the proposed improvements at Jamacha Boulevard, Jamacha Road, Steele Canyon, Maxfield Road and Lyons Valley Road.

Figure 2.4-15 illustrates the Near Term (2015) peak-hour traffic volumes at the study intersections for a typical weekday. **Figure 2.4-16** illustrates the Near Term (2015) traffic volumes at the study intersections for typical Friday and Saturday peak-hour periods. **Figure 2.4-17** illustrates the peak-hour traffic volume adjustments needed for the evaluation of the Alternative 3: Melody Road Access scenario, where the JIV Gaming Development Project related traffic uses Melody Road to access the SR-94.

Intersection Analysis

Tables 2.4-38 and **2.4-39** display the peak-hour LOS analysis results for the study intersections under the Near Term (2015) plus Proposed Project Alternatives 1-2 Conditions for all peak-hour scenarios analyzed. As shown in the tables, with the implementation of the Proposed Project improvements, all intersections would operate with equal or less delay than the before Project conditions or would operate at an acceptable level of service. Implementation of Alternatives 1-2 would result in a less-than-significant impact.

TABLE 2.4-38
NEAR TERM (2015) PLUS PROPOSED PROJECT
ALTERNATIVES 1 AND 2 PEAK-HOUR INTERSECTION LOS (WEEKDAY)
SEGMENT ANALYSIS

Intersection		Peak Hour	Near Term (2015) No Build		Near Term (2015) with Improvements (ALT 1-2)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	AM	44.2	**D**	44.2	**D**	0.0
		PM	91.7	**F**	91.7	**F**	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	AM	18.8	B	22.1	C	3.3
		PM	57.1	**E**	50.9	**D**	-6.2
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	36.1	**D**	35.1	**D**	-1.0
		PM	94.2	**F**	66.4	**E**	-27.8
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	34.7	C	34.7	C	0.0
		PM	45.6	**D**	45.6	**D**	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	AM	43.9	**D**	23.1	C	-20.8
		PM	119.7	**F**	28.6	C	-91.1
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	AM	ECL	**F**	27.2	C	-
		PM	ECL	**F**	20.4	C	-
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	AM	53.2	**D**	53.2	**D**	0.0
		PM	61.1	**E**	61.1	**E**	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	AM	25.4	**D**	14.7	B	-10.7
		PM	111.2	**F**	27.0	**D**	-84.2
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	AM	43.5	**D**	8.9	A	-34.6
		PM	179.9	**F**	10.8	B	-169.1
10	SR-94 (Campo Rd) & Reservation Rd.	AM	56.7	**E**	4.8	A	-51.9
		PM	767.0	**F**	7.1	A	-759.9
11	SR-94 (Campo Rd) & Honey Springs Rd.	AM	16.8	C	16.8	C	0.0
		PM	17.2	C	17.2	C	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	AM	20.0	C	20.0	C	0.0
		PM	23.8	C	23.8	C	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements

Bold values indicate intersections operating at LOS D, E or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-39
NEAR TERM (2015) PLUS PROPOSED PROJECT ALTERNATIVES 1 AND 2 PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Near Term (2015) No Build		Near Term (2015) With Improvements (ALT 1-2)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	65.2	**E**	65.2	**E**	0.0
		SAT PM	32.6	C	32.6	C	0.0
2	Jamacha Blvd. & SR 94 (Campo Rd)	FRI PM	52.4	**D**	40.3	**D**	-12.1
		SAT PM	22.2	C	24.0	C	1.8
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	71.2	**E**	60.4	**E**	-10.8
		SAT PM	41.5	**D**	40.1	**D**	-1.4
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	19.9	B	19.9	B	0.0
		SAT PM	9.5	A	9.5	A	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	FRI PM	69.5	**E**	26.9	C	-42.6
		SAT PM	29.9	C	18.1	B	-11.8
6	Indian Springs Dr./Lyons Valley Rd. & SR 94 (Campo Rd)	FRI PM	ECL	**F**	11.5	B	-
		SAT PM	1472.9	**F**	8.8	A	-1464.1
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	FRI PM	41.9	**D**	41.9	**D**	0.0
		SAT PM	23.7	C	23.7	C	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	FRI PM	96.0	**F**	26.2	**D**	-69.8
		SAT PM	40.1	**E**	19.2	C	-20.9
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	FRI PM	109.1	**F**	8.6	A	-100.5
		SAT PM	48.3	**D**	8.3	A	-40.0
10	SR-94 (Campo Rd) & Reservation Rd.	FRI PM	ECL	**F**	9.4	A	-
		SAT PM	ECL	**F**	7.8	A	-
11	SR-94 (Campo Rd) & Honey Springs Rd.	FRI PM	22.8	C	22.8	C	0.0
		SAT PM	16.4	C	16.4	C	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	FRI PM	32.5	**D**	32.5	**D**	0.0
		SAT PM	18.2	C	18.2	C	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements

Bold values indicate intersections operating at LOS D, E or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

Tables 2.4-40 and **2.4-41** display the peak-hour LOS analysis results for the study intersections under the Near Term (2015) with Project Alternative 3: Melody Road Access conditions for all peak-hour scenarios analyzed. As shown in the tables, with the implementation of the Proposed Project improvements, all intersections would operate with equal or less delay than the before Project conditions or would operate at an acceptable level of service. Implementation of Alternative 3: Melody Road Access would result in a less-than-significant impact.

Intersection Analysis (ILV)

Tables 2.4-42 and **2.4-43** display the ILV analysis results for the Caltrans-owned signalized intersections under Near Term (2015) Plus Proposed Project Improvements Conditions for all peak hours analyzed. As shown in the tables, even though some intersections along SR-94 (Campo Road) would be above capacity under Near Term (2015) Plus Proposed Project Improvements Conditions, all intersections would have equal or better operations with the Proposed Project improvements than before Project conditions. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact.

Peak-Hour Arterial Analysis

Tables 2.4-44 and **2.4-45** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under Near Term (2015) Plus Proposed Project Improvements Conditions. As shown in the tables, with the Proposed Project improvements, the analyzed roadway segment would operate at LOS C or better. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact.

HCM Peak-Hour Two-Lane Highway Analysis

With the completion of the Project, new traffic signals would be installed at the following intersections:

- SR-94 (Campo Road) and Lyons Valley Road;
- SR-94 (Campo Road) and Melody Road; and
- SR-94 (Campo Road) and Reservation Road or Daisy Drive (Alternatives 1 and 2 only).

The installation of traffic signals at these locations would change the characteristics of the roadway operations between Proctor Valley Road and Otay Lakes Road making the HCM peak-hour two-lane highway analysis no longer applicable. With the installation of the traffic signals, this segment would operate as an arterial since traffic signals would be located within a 2 mile distance from each other. **Tables 2.4-46** and **2.4-47** show the results of the Peak-Hour Arterial Analysis for the segment between Via Mercado and Melody Road. As shown in the Table, the

results of the analysis show that SR-94 would operate at LOS C or better. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact.

TABLE 2.4-40
NEAR TERM (2015) PROPOSED PROJECT
ALTERNATIVE 3: MELODY ROAD ACCESS PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Peak Hour	Near Term (2015) No Build		Near Term (2015) With Improvements (ALT 3)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	AM	44.2	**D**	44.2	**D**	0.0
		PM	91.7	**F**	91.7	**F**	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	AM	18.8	B	22.1	C	3.3
		PM	57.1	**E**	50.9	**D**	-6.2
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	36.1	**D**	35.1	**D**	-1.0
		PM	94.2	**F**	66.4	**E**	-27.8
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	34.7	C	34.7	C	0.0
		PM	45.6	**D**	45.6	**D**	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	AM	43.9	**D**	23.1	C	-20.8
		PM	119.7	**F**	28.6	C	-91.1
6	Indian Springs Dr./Lyons Valley Rd. & SR-94 (Campo Rd)	AM	ECL	**F**	27.2	C	-
		PM	ECL	**F**	20.4	C	-
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	AM	53.2	**D**	53.2	**D**	0.0
		PM	61.1	**E**	61.1	**E**	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	AM	25.4	**D**	14.7	B	-10.7
		PM	111.2	**F**	27.0	**D**	-84.2
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	AM	43.5	**D**	18.1	B	-25.4
		PM	179.9	**F**	20.6	C	-159.3
10	SR-94 (Campo Rd) & Reservation Rd.	AM	56.7	**F**	This intersection does not exist under this scenario.		
		PM	767.0	**F**			
11	SR-94 (Campo Rd) & Honey Springs Rd.	AM	16.8	C	16.8	C	0.0
		PM	17.2	C	17.2	C	0.0
12	SR-94 (Campo Rd) & Otay Lakes Rd.	AM	20.0	C	20.0	C	0.0
		PM	23.8	C	23.8	C	0.0
13	Melody Road & Casino Dwy	AM	16.1	B	16.1	B	0.0
		PM	8.0	A	8.0	A	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements

Bold values indicate intersections operating at LOS D, E or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds

TABLE 2.4-41
NEAR TERM (2015) PLUS PROPOSED PROJECT
ALTERNATIVE 3: MELODY ROAD ACCESS
PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Near Term (2015) No Build		Near Term (2015) With Improvements (ALT 3)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR 94 (Campo Rd) & Via Mercado	AM	65.2	**E**	65.2	**E**	0.0
		PM	32.6	C	32.6	C	0.0
2	Jamacha Blvd. & SR 94 (Campo Rd)	AM	52.4	**D**	40.3	**D**	-12.1
		PM	22.2	C	24.0	C	1.8
3	SR 94 (Campo Rd) & Jamacha Rd.	AM	71.2	**E**	60.4	**E**	-10.8
		PM	41.5	**D**	40.1	**D**	-1.4
4	SR 94 (Campo Rd) & Cougar Canyon Rd.	AM	19.9	B	19.9	B	0.0
		PM	9.5	A	9.5	A	0.0
5	Steele Canyon Rd. & SR 94 (Campo Rd)	AM	69.5	**E**	26.9	C	-42.6
		PM	29.9	C	18.1	B	-11.8
6	Indian Springs Dr./Lyons Valley Rd. & SR 94 (Campo Rd)	AM	ECL	**F**	11.5	B	-
		PM	1472.9	**F**	8.8	A	-1464.1
7	Proctor Valley Rd./Jefferson Rd. & SR 94 (Campo Rd)	AM	41.9	**D**	41.9	**D**	0.0
		PM	23.7	C	23.7	C	0.0
8	SR 94 (Campo Rd) & Maxfield Rd.	AM	96.0	**F**	26.2	**D**	-69.8
		PM	40.1	**E**	19.2	C	-20.9
9	SR 94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	AM	109.1	**F**	19.4	B	-89.7
		PM	48.3	**D**	16.2	B	-32.1
10	SR 94 (Campo Rd) & Reservation Rd.	AM	ECL	**F**	This intersection does not exist under this scenario.		
		PM	ECL	**F**			
11	SR 94 (Campo Rd) & Honey Springs Rd.	AM	22.8	C	22.8	C	0.0
		PM	16.4	C	16.4	C	0.0
12	SR 94 (Campo Rd) & Otay Lakes Rd.	AM	32.5	**D**	32.5	**D**	0.0
		PM	18.2	C	18.2	C	0.0
13	Melody Rd & Casino Dwy	AM	12.7	B	12.7	B	0.0
		PM	11.0	B	11.0	B	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements

Bold values indicate intersections operating at LOS D, E or F.

ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-42
NEAR TERM (2015) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3)
ILV ANALYSIS (WEEKDAY)

Intersection		Peak Hour	Near Term (2015) No Build		Near Term (2015) with Improvements (ALT 1-2)		Near Term (2015) with Improvements (ALT 3)	
			ILV/Hr Total	Capacity	ILV/Hr Total	Capacity	ILV/Hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	1537	**Above Capacity**	1537	**Above Capacity**	1537	**Above Capacity**
		PM	1727	**Above Capacity**	1727	**Above Capacity**	1727	**Above Capacity**
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	1267	Approaching Capacity	999	Below Capacity	999	Below Capacity
		PM	1631	**Above Capacity**	1384	Approaching Capacity	1384	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	1210	Approaching Capacity	1210	Approaching Capacity	1210	Approaching Capacity
		PM	1684	**Above Capacity**	1050	Below Capacity	1050	Below Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1484	Approaching Capacity	1484	Approaching Capacity	1484	Approaching Capacity
		PM	1697	**Above Capacity**	1697	**Above Capacity**	1697	**Above Capacity**
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1530	**Above Capacity**	1061	Below Capacity	1061	Below Capacity
		PM	1891	**Above Capacity**	1167	Below Capacity	1167	Below Capacity
6	SR-94 (Campo Rd) & Lyons Valley Rd	AM	This intersection would not be signalized under this scenario		1550	**Above Capacity**	1550	**Above Capacity**
		PM			1610	**Above Capacity**	1610	**Above Capacity**
7	SR-94 (Campo Rd) & Jefferson Rd	AM	1249	Approaching Capacity	1249	Approaching Capacity	1249	Approaching Capacity
		PM	1670	**Above Capacity**	1670	**Above Capacity**	1670	**Above Capacity**
9	SR-94 (Campo Rd) & Melody Rd	AM	This intersection would not be signalized under this scenario		703	Below Capacity	739	Below Capacity
		PM			1028	Below Capacity	790	Below Capacity
10	SR-94 (Campo Rd) & Reservation Rd or Daisy Drive	AM	This intersection would not be signalized under this scenario		502	Below Capacity	This intersection would not be signalized under this scenario	
		PM			746	Below Capacity		

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-43
NEAR TERM (2015) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ILV ANALYSIS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Near Term (2015) No Build		Near Term (2015) with Improvements (ALT 1-2)		Near Term (2015) with Improvements (ALT 3)	
			ILV Total	Capacity	ILV Total	Capacity	ILV Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	1669	**Above Capacity**	1669	**Above Capacity**	1669	**Above Capacity**
		PM	1404	Approaching Capacity	1404	Approaching Capacity	1404	Approaching Capacity
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	1592	**Above Capacity**	1308	Approaching Capacity	1308	Approaching Capacity
		PM	1291	Approaching Capacity	1079	Below Capacity	1079	Below Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	1465	Approaching Capacity	1451	Approaching Capacity	1451	Approaching Capacity
		PM	1281	Approaching Capacity	1281	Approaching Capacity	1281	Approaching Capacity
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1420	Approaching Capacity	1420	Approaching Capacity	1420	Approaching Capacity
		PM	968	Below Capacity	968	Below Capacity	968	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1591	**Above Capacity**	962	Below Capacity	962	Below Capacity
		PM	1197	Below Capacity	806	Below Capacity	806	Below Capacity
6	SR-94 (Campo Rd) & Lyons Valley	AM	This intersection would not be signalized under this scenario		1424	Approaching Capacity	1424	Approaching Capacity
		PM			1311	Approaching Capacity	1311	Approaching Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	AM	1684	**Above Capacity**	1684	**Above Capacity**	1684	**Above Capacity**
		PM	1288	Approaching Capacity	1288	Approaching Capacity	1288	Approaching Capacity
9	SR-94 (Campo Rd) & Melody Rd	AM	This intersection would not be signalized under this scenario		1111	Below Capacity	980	Below Capacity
		PM			900	Below Capacity	978	Below Capacity
10	SR-94 (Campo Rd) & Reservation Rd or Daisy Drive	AM	This intersection would not be signalized under this scenario		971	Below Capacity	This intersection would not be signalized under this scenario	
		PM			960	Below Capacity		

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-44
NEAR TERM (2015) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (WEEKDAY)

Roadway Segment	Direction	Near Term No Build		Near Term with Improvements (ALT 1-3)		
		Speed (a)	LOS (b)	Speed (a)	LOS (b)	Δ
AM						
SR-94						
Via Mercado to Proctor Valley Rd	EB	45.2	A	44.2	A	-1.0
	WB	35.5	B	36.1	B	-0.6
PM Peak						
SR-94						
Via Mercado to Proctor Valley Rd	EB	24.6	**D**	33.0	C	8.4
	WB	33.8	C	34.3	B	0.5

Notes:

(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).

(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

(c) **Bold** values indicate intersection operating at LOS D, E or F.

TABLE 2.4-45
NEAR TERM (2015) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) PEAK-HOUR ARTERIAL SEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Near Term No Build		Near Term with Improvements (ALT 1-3)		
		Speed (a)	LOS (b)	Speed (a)	LOS (b)	Δ
Friday						
SR-94						
Via Mercado to Proctor Valley Rd	EB	31.6	C	37.7	B	6.1
	WB	34.6	B	34.7	B	0.1
Saturday PM						
SR-94						
Via Mercado to Proctor Valley Rd	EB	44.9	A	44.1	A	-0.8
	WB	39.0	B	38.6	B	-0.4

Notes:

(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).

(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-46
NEAR TERM (2015) PLUS PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) PEAK-HOUR ARTERIAL SEGMENT ANALYSIS TO MELODY ROAD (WEEKDAY)

Roadway Segment	Direction	AM Peak		PM Peak	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Reservation Rd	EB	44.4	A	34.1	B
	WB	34.1	B	33.1	C

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-47
NEAR TERM (2015) PLUS PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) PEAK-HOUR ARTERIAL SEGMENT ANALYSIS TO MELODY ROAD (FRIDAY/SATURDAY)

Roadway Segment	Direction	Friday		Saturday	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Reservation Rd	EB	37.3	B	44.5	A
	WB	34.1	B	38.8	B

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no Near Term Year impacts would result.

Horizon Year (2035) plus Proposed Project Conditions Analysis

This section summarizes the operations of the street network assumed to be in place under the Horizon Year (2035) Conditions with the addition of the roadway improvements proposed as part of the Proposed Project.

Alternatives 1-3: Build Alternatives

Road Network

Horizon Year (2035) plus Proposed Project Improvements Conditions was analyzed with the Proposed Project intersection traffic control, striping, and roadway facility improvements described in Chapter 1 Project Description. In addition, per the County of San Diego's Mobility Element included in the approved General Plan, two roadway segment improvements were assumed to be completed under the Horizon Year (2035) with Project conditions:

- Completion of Proctor Valley Road as a 2-lane light collector from Chula Vista city limits to SR-94; and
- Realignment of Otay Lakes Road with the intersection of Honey Springs Road to form a four-way intersection at SR-94.

Traffic Volumes

The Proposed Project improvements would not generate any permanent additional traffic; therefore Horizon Year (2035) plus Proposed Project Improvements Conditions volumes would be the same as Horizon Year (2035) No Build Conditions (**Figures 2.4-11** and **2.4-12**). **Figure 2.4-18** illustrates the Horizon Year (2035) plus Proposed Project Improvements Conditions peak-hour traffic volumes at the study intersections for a typical weekday. **Figure 2.4-19** illustrates the Horizon Year (2035) plus Proposed Project Improvements Conditions traffic volumes at the study intersections for typical Friday and Saturday peak-hour periods. **Figure 2.4-20** illustrates the Horizon Year (2035) plus Proposed Project Improvements Conditions peak-hour traffic volume adjustments needed for the evaluation of the Alternative 3: Melody Road Access, where the JIV Gaming Development Project related traffic uses Melody Road to access the SR-94.

Intersection Analysis

Tables 2.4-48 and 2.4-49 display the peak-hour LOS analysis results for the study intersections under Horizon Year (2035) plus Proposed Project Alternatives 1-2 Conditions. **Tables 2.4-50** and **2.4-51** display the peak-hour LOS analysis results for the study intersections under the Horizon Year (2035) plus Proposed Project Alternative 3: Melody Road Access Conditions for all peak-hour scenarios analyzed. As shown in the tables, all intersections would operate at equal or better LOS than before Project conditions with the exception of the following intersection:

- SR-94 (Campo Road) & Jamacha Boulevard (LOS E weekday a.m. peak-hour, LOS F weekday p.m. peak-hour, and LOS D Saturday p.m. peak-hour)

TABLE 2.4-48
HORIZON YEAR (2035) PLUS PROPOSED PROJECT ALTERNATIVES 1-2 PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Peak Hour	Horizon Year (2035) No Build		Horizon Year (2035) with Project (ALT 1-2)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	AM	178.7	**F**	178.7	**F**	0.0
		PM	312.4	**F**	312.4	**F**	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	AM	29.6	C	56.7	**E**	27.1
		PM	84.5	**F**	87.6	**F**	3.1
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	61.6	**E**	60.5	**E**	-1.1
		PM	185.6	**F**	155.0	**F**	-30.6
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	41.5	**D**	41.5	**D**	0.0
		PM	43.4	**D**	43.4	**D**	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	AM	50.9	**D**	25.6	C	-25.3
		PM	124.4	**F**	31.4	C	-93.0
6	Indian Springs Dr/Lyons Valley Rd. & SR-94 (Campo Rd)	AM	ECL	**F**	37.2	**D**	-
		PM	ECL	**F**	22.3	C	-
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	AM	388.9	**F**	388.9	**F**	0.0
		PM	321.6	**F**	321.6	**F**	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	AM	26.7	**D**	15.0	C	-11.7
		PM	217.9	**F**	31.9	**D**	-186.0
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	AM	38.9	**D**	12.8	B	-26.1
		PM	259.5	**F**	16.0	B	-243.5
10	SR-94 (Campo Rd) & Reservation Rd.	AM	87.1	**F**	4.8	A	-82.3
		PM	ECL	**F**	7.8	A	-
11	SR-94 (Campo Rd) & Honey Springs Rd.	As part of the County of San Diego's General Plan, the intersection of Honey Springs Road would be realigned to form a four-way intersection with Otay Lakes.					
12	SR-94 (Campo Rd) & Otay Lakes Rd.	AM	20.1	C	20.1	C	0.0
		PM	30.4	C	30.4	C	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements
Bold values indicate intersections operating at LOS D, E or F.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-49
HORIZON YEAR (2035) PLUS PROPOSED PROJECT ALTERNATIVES 1-2 PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Horizon Year (2035) No Build		Horizon Year (2035) with Project (ALT 1-2)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	276.9	**F**	276.9	**F**	0.0
		SAT PM	146.5	**F**	146.5	**F**	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	FRI PM	88.2	**F**	85.7	**F**	-2.5
		SAT PM	36.6	**D**	43.8	**D**	7.2
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	160.3	**F**	143.4	**F**	-16.9
		SAT PM	99.0	**F**	95.2	**F**	-3.8
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	23.9	C	23.9	C	0.0
		SAT PM	9.5	A	9.5	A	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	FRI PM	90.9	**F**	31.2	C	-59.7
		SAT PM	31.5	C	19.8	B	-11.7
6	Indian Springs Dr./Lyons Valley Rd & SR-94 (Campo Rd)	FRI PM	ECL	**F**	18.3	B	-
		SAT PM	1499.5	**F**	8.7	A	-1490.8
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	FRI PM	307.0	**F**	307.0	**F**	0.0
		SAT PM	140.5	**F**	140.5	**F**	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	FRI PM	256.7	**F**	33.8	**D**	-222.9
		SAT PM	52.7	**F**	20.7	C	-32.0
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	FRI PM	352.2	**F**	18.2	B	-334.0
		SAT PM	62.7	**E**	12.1	B	-50.6
10	SR-94 (Campo Rd) & Reservation Rd.	FRI PM	ECL	**F**	11.2	B	-
		SAT PM	ECL	**F**	8.3	A	-
11	SR-94 (Campo Rd) & Honey Springs Rd.	As part of the County of San Diego's General Plan, the intersection of Honey Springs Road would be realigned to form a four-way intersection with Otay Lakes.					
12	SR-94 (Campo Rd) & Otay Lakes Rd.	FRI PM	39.3	**D**	39.3	**D**	0.0
		SAT PM	17.5	B	17.5	B	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements
Bold values indicate intersections operating at LOS D, E or F.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-50
HORIZON YEAR (2035) PLUS PROPOSED PROJECT ALTERNATIVE 3: MELODY ROAD ACCESS PEAK-HOUR INTERSECTION LOS (WEEKDAY)

Intersection		Peak Hour	Horizon Year (2035) No Build		Horizon Year (2035) with Project (ALT 3)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd.) & Via Mercado	AM	178.7	**F**	178.7	**F**	0.0
		PM	312.4	**F**	312.4	**F**	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd.)	AM	29.6	C	56.7	**E**	27.1
		PM	84.5	**F**	87.6	**F**	3.1
3	SR-94 (Campo Rd.) & Jamacha Rd.	AM	61.6	**E**	60.5	**E**	-1.1
		PM	185.6	**F**	155.0	**F**	-30.6
4	SR-94 (Campo Rd.) & Cougar Canyon Rd.	AM	41.5	**D**	41.5	**D**	0.0
		PM	43.4	**D**	43.4	**D**	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	AM	50.9	**D**	25.6	C	-25.3
		PM	124.4	**F**	31.4	C	-93.0
6	Indian Springs Dr. /Lyons Valley Rd. & SR-94 (Campo Rd)	AM	ECL	**F**	37.2	**D**	-
		PM	ECL	**F**	22.3	C	-
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	AM	388.9	**F**	388.9	**F**	0.0
		PM	321.6	**F**	321.6	**F**	0.0
8	SR-94 (Campo Rd.) & Maxfield Rd.	AM	26.7	**D**	15.0	C	-11.7
		PM	217.9	**F**	31.9	**D**	-186.0
9	SR-94 (Campo Rd.) & Melody Rd./Peaceful Valley Ranch Rd.	AM	38.9	**D**	16.1	B	-22.8
		PM	259.5	**F**	20.9	C	-238.6
10	SR-94 (Campo Rd.) & Reservation Rd.	AM	87.1	**F**	This intersection does not exist under this scenario.		
		PM	ECL	**F**			
11	SR-94 (Campo Rd.) & Honey Springs Rd.	As part of the County of San Diego's General Plan, the intersection of Honey Springs Road would be realigned to form a four-way intersection with Otay Lakes.					
12	SR-94 (Campo Rd.) & Otay Lakes Rd.	AM	20.1	C	20.1	C	0.0
		PM	30.4	C	30.4	C	0.0
13	Melody Rd & Casino Dwy	AM	17.0	B	17.0	B	0.0
		PM	13.2	B	13.2	B	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements
Bold values indicate intersections operating at LOS D, E or F.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

TABLE 2.4-51
HORIZON YEAR (2035) PLUS PROPOSED PROJECT
ALTERNATIVE 3: MELODY ROAD ACCESS PEAK-HOUR INTERSECTION LOS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Horizon Year (2035) No Build		Horizon Year (2035) with Project (ALT 3)		
			Delay (a)	LOS (b)	Delay (a)	LOS (b)	Δ (c)
1	SR-94 (Campo Rd) & Via Mercado	FRI PM	276.9	**F**	276.9	**F**	0.0
		SAT PM	146.5	**F**	146.5	**F**	0.0
2	Jamacha Blvd. & SR-94 (Campo Rd)	FRI PM	88.2	**F**	85.7	**F**	-2.5
		SAT PM	36.6	**D**	43.8	**D**	7.2
3	SR-94 (Campo Rd) & Jamacha Rd.	FRI PM	160.3	**F**	143.4	**F**	-16.9
		SAT PM	99.0	**F**	95.2	**F**	-3.8
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	FRI PM	23.9	C	23.9	C	0.0
		SAT PM	9.5	A	9.5	A	0.0
5	Steele Canyon Rd. & SR-94 (Campo Rd)	FRI PM	90.9	**F**	31.2	C	-59.7
		SAT PM	31.5	C	19.8	B	-11.7
6	Indian Springs Dr. /Lyons Valley Rd. & SR-94 (Campo Rd)	FRI PM	ECL	**F**	18.3	B	-
		SAT PM	1499.5	**F**	8.7	A	-1490.8
7	Proctor Valley Rd./Jefferson Rd. & SR-94 (Campo Rd)	FRI PM	307.0	**F**	307.0	**F**	0.0
		SAT PM	140.5	**F**	140.5	**F**	0.0
8	SR-94 (Campo Rd) & Maxfield Rd.	FRI PM	256.7	**F**	33.8	**D**	-222.9
		SAT PM	52.7	**F**	20.7	C	-32.0
9	SR-94 (Campo Rd) & Melody Rd./Peaceful Valley Ranch Rd.	FRI PM	352.2	**F**	22.2	C	-330.0
		SAT PM	62.7	**E**	30.8	C	-31.9
10	SR-94 (Campo Rd) & Reservation Rd.	FRI PM	ECL	**F**	This intersection does not exist under this scenario.		
		SAT PM	ECL	**F**			
11	SR-94 (Campo Rd) & Honey Springs Rd.	As part of the County of San Diego's General Plan, the intersection of Honey Springs Road would be realigned to form a four-way intersection with Otay Lakes.					
12	SR-94 (Campo Rd) & Otay Lakes Rd.	FRI PM	39.3	**D**	39.3	**D**	0.0
		SAT PM	17.5	B	17.5	B	0.0
13	Melody Rd & Casino Dwy	FRI PM	12.9	B	12.9	B	0.0
		SAT PM	12.9	B	12.9	B	0.0

Notes:
(a) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a two-way stop-controlled intersection, delay refers to the worst movement.
(b) LOS calculations are based on the methodology outlined in the *2000 Highway Capacity Manual* and performed using Synchro 8.0
(c) Change in delay due to addition of Project Proposed Improvements
Bold values indicate intersections operating at LOS D, E or F.
ECL = Exceeds Calculable Limit. Reported when delay exceeds 1500 seconds.

The HCM intersection analysis shows that overall traffic operations at the study intersections are improved as a result of implementing the Proposed Project improvements in the Horizon Year. One exception noted in the analysis is the intersection listed above. The proposed improvement at this intersection would increase the overall delay at this intersection and would result in an adverse cumulative contribution to traffic operations at the intersection when compared to the No Build scenario. However, when evaluating the proposed roadway improvements within study area overall, traffic operations are improved compared to the No Build scenario. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact.

Intersection Analysis (ILV)

Tables 2.4-52 and **2.4-53** displays the ILV analysis results for the signalized intersections within the State ROW under the Horizon Year (2035) Plus Proposed Project Improvements Conditions for all peak hours analyzed. As shown in the tables, all existing signalized intersections would operate at equal or better operations than the Horizon Year (2035) No Build scenario with the exception of SR-94 & Jamacha Boulevard during the AM peak-hour (Approaching Capacity). The new traffic signal at SR-94 (Campo Road) and Lyons Valley Road would operate at above capacity. The new traffic signals at Melody Road, Reservation Road and Otay Lakes Road would operate at below or approaching capacity conditions. The Proposed Project improvements would not result in any adverse operations at signalized intersections within the State ROW compared to the No Build scenario. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact.

Peak-Hour Arterial Analysis

Tables 2.4-54 through **2.4-55** display the peak-hour arterial analysis along SR-94 (Campo Road) between Via Mercado and Proctor Valley Road under Horizon Year (2035) plus Proposed Project Improvements Conditions. As shown in the table, with the exception of the eastbound direction during the weekday morning peak-hour period, SR-94 (Campo Road) would operate at better than before Project conditions during all peak-hour periods analyzed. Although overall vehicular traffic speed would decrease during the morning peak-hour period in the eastbound direction, the corridor would operate at an acceptable LOS C. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact. HCM Peak-Hour Two-Lane Highway Analysis

TABLE 2.4-52
HORIZON YEAR (2035) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ILV ANALYSIS (WEEKDAY)

Intersection		Peak Hour	Horizon Year (2035) No Build		Horizon Year (2035) Plus Project Alternatives 1-2		Horizon Year (2035) Plus Project Alternative 3	
			ILV/hr Total	Capacity	ILV/hr Total	Capacity	ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	2104	**Above Capacity**	2104	**Above Capacity**	2104	**Above Capacity**
		PM	2600	**Above Capacity**	2600	**Above Capacity**	2600	**Above Capacity**
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	1061	Below Capacity	1304	Approaching Capacity	1304	Approaching Capacity
		PM	1739	**Above Capacity**	1626	**Above Capacity**	1626	**Above Capacity**
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	1419	Approaching Capacity	1419	Approaching Capacity	1419	Approaching Capacity
		PM	1951	**Above Capacity**	1951	**Above Capacity**	1951	**Above Capacity**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1565	**Above Capacity**	1565	**Above Capacity**	1565	**Above Capacity**
		PM	1680	**Above Capacity**	1680	**Above Capacity**	1680	**Above Capacity**
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1604	**Above Capacity**	1144	Below Capacity	1144	Below Capacity
		PM	1904	**Above Capacity**	1138	Below Capacity	1138	Below Capacity
6	SR-94 (Campo Rd) & Lyons Valley Rd	AM	This intersection would not be signalized under this scenario		1625	**Above Capacity**	1625	**Above Capacity**
		PM			1584	**Above Capacity**	1584	**Above Capacity**
7	SR-94 (Campo Rd) & Jefferson Rd	AM	3025	**Above Capacity**	3025	**Above Capacity**	3025	**Above Capacity**
		PM	2204	**Above Capacity**	2204	**Above Capacity**	2204	**Above Capacity**
9	SR-94 (Campo Rd) & Melody Rd	AM	This intersection would not be signalized under this scenario		774	Below Capacity	671	Below Capacity
		PM			1056	Below Capacity	762	Below Capacity
10	SR-94 (Campo Rd) & Reservation Rd or Daisy Drive	AM	This intersection would not be signalized under this scenario		514	Below Capacity	This intersection would not be signalized under this scenario	
		PM			874	Below Capacity		
12	SR-94 (Campo Rd) & Otay Lakes Rd	AM	This intersection would not be signalized under this scenario		1002	Below Capacity	1002	Below Capacity
		PM			1189	Below Capacity	1189	Below Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-53
HORIZON YEAR (2035) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ILV ANALYSIS (FRIDAY/SATURDAY)

Intersection		Peak Hour	Horizon Year (2035) No Build		Horizon Year (2035) Plus Project Alternatives 1 - 2		Horizon Year (2035) Plus Project Alternative 3: Melody Road Access Alignment	
			ILV/hr Total	Capacity	ILV/hr Total	Capacity	ILV/hr Total	Capacity
1	SR-94 (Campo Rd) & Via Mercado	AM	2540	**Above Capacity**	2540	**Above Capacity**	2540	**Above Capacity**
		PM	2030	**Above Capacity**	2030	**Above Capacity**	2030	**Above Capacity**
2	SR-94 (Campo Rd) & Jamacha Blvd.	AM	1781	**Above Capacity**	1550	**Above Capacity**	1550	**Above Capacity**
		PM	1447	Approaching Capacity	1327	Approaching Capacity	1327	Approaching Capacity
3	SR-94 (Campo Rd) & Jamacha Rd.	AM	2150	**Above Capacity**	2150	**Above Capacity**	2150	**Above Capacity**
		PM	1600	**Above Capacity**	1600	**Above Capacity**	1600	**Above Capacity**
4	SR-94 (Campo Rd) & Cougar Canyon Rd.	AM	1523	**Above Capacity**	1523	**Above Capacity**	1523	**Above Capacity**
		PM	960	Below Capacity	960	Below Capacity	960	Below Capacity
5	SR-94 (Campo Rd) & Steele Canyon Rd.	AM	1715	**Above Capacity**	1063	Below Capacity	1063	Below Capacity
		PM	1212	Approaching Capacity	851	Below Capacity	851	Below Capacity
6	SR-94 (Campo Rd) & Lyons Valley Rd	AM	This intersection would not be signalized under this scenario		1626	**Above Capacity**	1626	**Above Capacity**
		PM			1339	Approaching Capacity	1339	Approaching Capacity
7	SR-94 (Campo Rd) & Jefferson Rd	AM	3025	**Above Capacity**	3025	**Above Capacity**	3025	**Above Capacity**
		PM	2204	**Above Capacity**	2204	**Above Capacity**	2204	**Above Capacity**
9	SR-94 (Campo Rd) & Melody Rd	AM	This intersection would not be signalized under this scenario		1222	Approaching Capacity	873	Approaching Capacity
		PM			975	Below Capacity	860	Below Capacity
10	SR-94 (Campo Rd) & Reservation Rd or Daisy Drive	AM	This intersection would not be signalized under this scenario		1114	Below Capacity	This intersection would not be signalized under this scenario	
		PM			947	Below Capacity		
12	SR-94 (Campo Rd) & Otay Lakes Rd	AM	This intersection would not be signalized under this scenario		1379	Approaching Capacity	1379	Approaching Capacity
		PM			818	Below Capacity	818	Below Capacity

Notes:
<1200 = Below Capacity, 1201 - 1500 = Approaching Capacity, >1500 = Above Capacity
Bold values indicate intersections operating above capacity.

TABLE 2.4-54
HORIZON YEAR (2035) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ARTERIAL SEGMENT ANALYSIS (WEEKDAY)

Roadway Segment	Direction	Horizon Year No Build		Horizon Year with Project Alt 1-3		
		Speed (a)	LOS (b)	Speed (a)	LOS (b)	Δ
AM Peak						
SR-94						
Via Mercado to Proctor Valley Rd	EB	33.8	C	33.5	C	-0.3
	WB	24.8	**D**	25.2	**D**	0.4
PM Peak						
SR-94						
Via Mercado to Proctor Valley Rd	EB	16.6	**E**	21.8	**D**	5.2
	WB	17.8	**E**	18.0	**E**	0.2

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-55
HORIZON YEAR (2035) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ARTERIAL SEGMENT ANALYSIS (FRIDAY/SATURDAY)

Roadway Segment	Direction	Horizon Year No Build		Horizon Year with Project Alt 1-3		
		Speed (a)	LOS (b)	Speed (a)	LOS (b)	Δ
Friday PM						
SR-94						
Via Mercado to Proctor Valley Rd	EB	19.3	**E**	23.1	**D**	3.8
	WB	16.4	**E**	16.6	**E**	0.2
Saturday PM						
SR-94						
Via Mercado to Proctor Valley Rd	EB	33.7	C	34.1	B	0.4
	WB	21.3	**D**	21.7	**D**	0.4

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

With the completion of the Project, new traffic signals would be installed at the following intersections:

- SR-94 (Campo Road) and Lyons Valley Road;
- SR-94 (Campo Road) and Melody Road; and
- SR-94 (Campo Road) and Reservation Road or Daisy Drive (Alternatives 1 and 2 only).

The installation of traffic signals at these locations would change the characteristics of the roadway operations between Proctor Valley Road and Otay Lakes Road making the HCM peak-hour two-lane highway analysis no longer applicable. With the installation of the traffic signals, this segment would operate as an arterial since traffic signals would be located within a 2 mile distance from each other. **Tables 2.4-56** and **2.4-57** show the results of the Peak-Hour Arterial Analysis for the segment between Via Mercado and Melody Road. As shown in the Tables, the results of the analysis show that during the weekdays, the eastbound movement would operate at LOS D or better and operate at LOS E in the westbound direction. During the weekend p.m. peak hour periods, arterial speeds on Friday would operate at LOS E or better and LOS D or better on Saturday. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur with Alternative 4: No Project Alternative; therefore, no Horizon Year impacts would result.

TABLE 2.4-56
HORIZON YEAR (2035) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ARTERIAL SEGMENT ANALYSIS TO MELODY ROAD (WEEKDAY)

Roadway Segment	Direction	AM Peak		PM Peak	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Reservation Rd	EB	35.0	B	23.6	**D**
	WB	20.1	**E**	17.2	**E**

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

TABLE 2.4-57
HORIZON YEAR (2035) PLUS PROPOSED PROJECT IMPROVEMENTS (ALTERNATIVES 1-3) ARTERIAL SEGMENT ANALYSIS TO MELODY ROAD (FRIDAY/SATURDAY)

Roadway Segment	Direction	Friday		Saturday	
		Speed (a)	LOS (b)	Speed (a)	LOS (b)
SR-94					
Via Mercado to Reservation Rd	EB	24.6	**D**	34.7	B
	WB	17.3	**E**	22.0	**D**

Notes:
(a) Speed is calculated as the roadway segment distance divided by the travel time in miles per hour (mph).
(b) The arterial LOS is based on average through-vehicle travel speed for the segment or for the entire street under consideration and is influenced both by the number of signals per mile and by the intersection control delay.

Construction (Short Term) Related Impacts

Alternatives 1-3: Build Alternatives

The project would generate temporary construction related trips along SR-94 (Campo Road). Construction-related vehicles would access or exit the project work areas through SR-94. Haul truck volumes associated with the Proposed Project would vary from day to day, with the highest volumes generally occurring during the excavation and surface preparation stage. Haul trucks would be used to haul excavated and demolished materials off-project area over the construction period. The soil hauling would not occur evenly throughout the construction period. More soil hauling with its associated truck trips would occur during the first phases of construction. Daily haul and delivery truck traffic associated with project construction will be nominal.

Other construction related temporary traffic would be generated from deliveries and workers arriving and leaving the project site during construction. The construction of the project (including haul trucks and deliveries and workers) would represent less than 1% of the total capacity of the existing roadway segments.

Traffic along SR-94 (Campo Road) and along all local roadways surrounding the project would remain open during all construction phases with the exception of construction activities along Melody Road. For all Build Alternatives, the section of Melody Road between Calle Mesquite and SR-94 would be closed for the construction of a new bottomless culvert near the intersection of Melody Road and SR-94. Only emergency access would be provided during the construction of the Melody Road segment, including the bottomless culvert. It is estimated that closure of Melody Road could last six months. All vehicular traffic that would otherwise use this section of Melody Road would be detoured to Proctor Valley Road. Based on the existing low traffic

volumes along Melody Road, the detoured traffic to Proctor Valley Road would not cause a significant traffic related impact along Proctor Valley Road, or at the intersection of Proctor Valley Road and SR-94.

See Section 2.4.4 Avoidance, Minimization and Mitigation Measures for a description of the traffic management strategies the project will use to minimize short term construction related impacts to SR-94 and the surrounding street network.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no construction impacts would result.

Pedestrian, Transit and Bike Facilities

Non-Access Road Intersections

SR-94/Jamacha Boulevard Intersection

Improvements at the SR-94/Jamacha Boulevard intersection would be constructed entirely within the existing ROW. Therefore, no temporary or permanent impacts would occur to pedestrians (no existing walkways exist and the Project would not preclude establishment of walkways in the future), transit (Project restriping does not impact an existing transit stops/route on Jamacha Boulevard nor would it preclude the establishment of one in the future), or bike lanes (restriping on Jamacha Boulevard does not impact existing bikeway nor would it preclude the establishment of a bike lane on SR-94. Implementation of the improvements for SR-94/Jamacha Road intersection would result in a less-than-significant impact.

SR-94/Jamacha Road Intersection

Improvements at the SR-94/Jamacha Road intersection would require additional ROW to the south of SR-94 in order to accommodate the additional right turn lane. These improvements would adversely affect pedestrians at this intersection. The existing pedestrian waiting area at the southwest corner of this intersection would be temporarily shut down during construction; however, the TMP would ensure that a temporary pedestrian waiting area be accommodated at this location. The existing concrete waiting area would be reconstructed as part of the Project. Transit service to Jamul would not be interrupted as the existing eastbound through lane on SR-94 would be temporarily converted to a through/right-turn lane thus allowing for a continuation of transit service. The dual right turn lane post-Project would facilitate transit service through this intersection post-Project. There are bike lanes along SR-94 west of Jamacha Road. The bike lane would be closed during construction. Share the road signs would be installed. The Project would

not preclude the establishment of an on-highway bike lane. Implementation of improvements for SR-94/Jamacha Road intersection would result in a less-than-significant impact.

SR-94/Steele Canyon Road Intersection

Improvements at the SR-94/Steele Canyon Road intersection require that the existing center lane be converted to eastbound and westbound through lanes in order to accommodate traffic during construction activities. No existing pedestrian walkways exist at this location. Post Project conditions include the establishment of pedestrian sidewalks along both the north and south sides of SR-94. Transit service to Jamul would not be interrupted as the existing center lane would be temporarily converted to accommodate traffic during construction activities. The existing bus stop at the north side of SR-94, approximately 275 feet west of the Steele Canyon Road intersection, would be removed and reconstructed at a location approximately 50 feet west of the intersection. The existing bus stop on the south side of SR-94, approximately 100 feet east of the Steele Canyon Road intersection, would be removed and reconstructed approximately 50 feet east of the intersection. No existing bike lanes exist at this location. The Project would not preclude the establishment of an on-highway bike lane at this location. Implementation of improvements for SR-94/Steele Canyon Road intersection would result in a less-than-significant impact.

SR-94/Lyons Valley Road Intersection

Improvements at the SR-94/Lyons Valley Road Intersection would not result in long term temporary lane closures. However, overnight lane closures may be needed for the installation of detection systems and/or pavement markings. Traffic operations would be maintained in all directions. No existing pedestrian walkways exist at this location. Post-Project conditions include the establishment of paved ADA ramps at each corner for pedestrians. Transit service to Jamul would not be interrupted as existing traffic would be accommodated during construction activities. No transit stop would be impacted at this location. The existing bike lane that begins at this intersection and continues up Lyons Valley Road to Jamul Drive would not be significantly impacted as SR-94/Lyons Valley Road is the termination of the bike lane. No bike lane connections would be interrupted by the construction activities. The Project would not preclude the establishment of an on-highway bike lane at this location in the future. Implementation of improvements for SR-94/Lyons Valley Road intersection would result in a less-than-significant impact.

SR-94/Maxfield Road Intersection

Improvements at the SR-94/Maxfield Road Intersection would not interrupt traffic flow through this intersection. Traffic operations would be maintained in all directions during construction activities. No existing pedestrian walkways exist at this location. Transit service to Jamul would not be interrupted as existing traffic would be accommodated during construction activities. No transit stop would be impacted at this location. No bike lanes exist at this improvement location.

The Project would not preclude the future establishment of pedestrian walkways, transit stops or bike lanes. Implementation of improvements for SR-94/Maxfield Road intersection would result in a less-than-significant impact.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives includes those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Improvements along the area covered by the Access Road Alignments could temporarily interrupt traffic flow from Melody Road to SR-94 depending on the type of Willow Creek crossing. No pedestrian walkways, transit stops or bike lanes exist at this location of the Project site. Transit service would remain uninterrupted along SR-94 as no highway lane closure would occur during construction. The Proposed Project would not preclude the future establishment of pedestrian walkways, transit stops, or bike lanes. Implementation of the Access Road Alignments would result in a less-than-significant impact.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; therefore, no Pedestrian, Transit, or Bike Facilities impacts would result.

2.4.4 Avoidance, Minimization and Mitigation Measures

The following measures would reduce traffic impacts during construction activities:

(1) Prepare a TMP to minimize motorist delays when implementing projects or performing other activities on the State Highway. The goals of the TMP are as follows:

   a. Reduce traffic delay or time spent in the queue to less than 15 minutes above normal recurring traffic delay,

   b. Maintain traffic flow throughout the corridor and the surrounding areas,

   c. Maintain existing transit operations, and

   d. Provide a safe environment for the work force and motoring public.

(2) Below are strategies that would be implemented as part of the TMP:

   a. A Public Awareness Campaign (PAC): The purpose of this is to provide advance roadway information to the public and provide an opportunity for the public to plan travel within the affected areas during construction periods. This will

include news releases distributed to media outlets and nearby emergency services, radio ads and paid advertising, and a project website with information about new project developments, temporary closures, and photos.

b. Use of portable changeable message signs: Portable changeable message signs will be placed at key locations to notify motorists of lane closures, detour routes, expected delays, and upcoming road closures. These signs will also inform drivers of speed limit reductions and enforcement activities in a work zone.

c. Use of ground mounted signs: Temporary conventional signs will be mounted in the ground to provide traveler information to guide motorists through the work zone.

d. Use of Caltrans Highway Information Network and SANDAG 5-1-1 traffic services: Work zone-related information, static (project dates) or real-time (potential delays) or both, using technology such as cellular telephones, pagers, in-vehicle systems, and e-mail notifications will be provided.

e. Use of Construction Zone Enhanced Enforcement Program: The project will contract with the California Highway Patrol (CHP) to provide enhanced enforcements services in work zones through the construction phasing.

f. Traffic Management Team: A team will be assembled to manage traffic during incidents and planned lane closure activities.

g. Construction Staging: A sequence of construction activities will be prepared with specifications that will identify portions of the project to be completed in a specific sequence to minimize impacts to the traveling public.

h. Traffic Handling Plans: Plans will be prepared containing alignment details, profiles and typical cross-sections to guide traffic through the work zone in the sequence shown in the construction staging plan.

i. Lane Requirement Charts: Charts will be prepared for the contractor identifying the number of lanes that must be open for traffic each hour of the day to minimize delay when work activities are being conducted.

j. Use of Lane Modifications: Traffic lane modifications will be used to maintain the existing number of travel lanes to the extent possible. Special consideration will be given to accommodate extra-high and extra-wide trucks where possible.

k. Use of Delay Clauses: Incentive/disincentive clauses will be used within the project's specifications for the contractor to minimize the overall construction duration of the project.

l. Coordination with Other Projects and Special Events: An effort will be made to combine, coordinate and stage the project phases within SR-94 to minimize a combined impact on the motoring public and community caused by other projects or special events.

m. Work hours limited to off-peak periods, nights or weekends: Allowable work windows will be determined to minimize work zone impacts on motorists and adjacent businesses. Consideration will be given to potential impacts to residents due to noise.

n. Speed Limit Reductions within the work zone: A reduced speed limit from 55 miles per hour to 45 miles per hour will be implemented within work areas to improve traffic and worker safety within the work zone.

(3) Parking associated with construction workers would be provided within the project footprint and managed by the contractor depending on each phase of construction.

(4) Sidewalk or pedestrian path closures would be temporary in nature and pedestrian detours would be provided during the sidewalk or pedestrian closures. Changes to the sidewalks in the vicinity of the affected roads would be ADA compliant.

(5) The traffic control set-ups to be used for each stage of construction would accommodate bicycle traffic per the latest California Manual on Traffic Control Devices and Caltrans Traffic Operations approval.

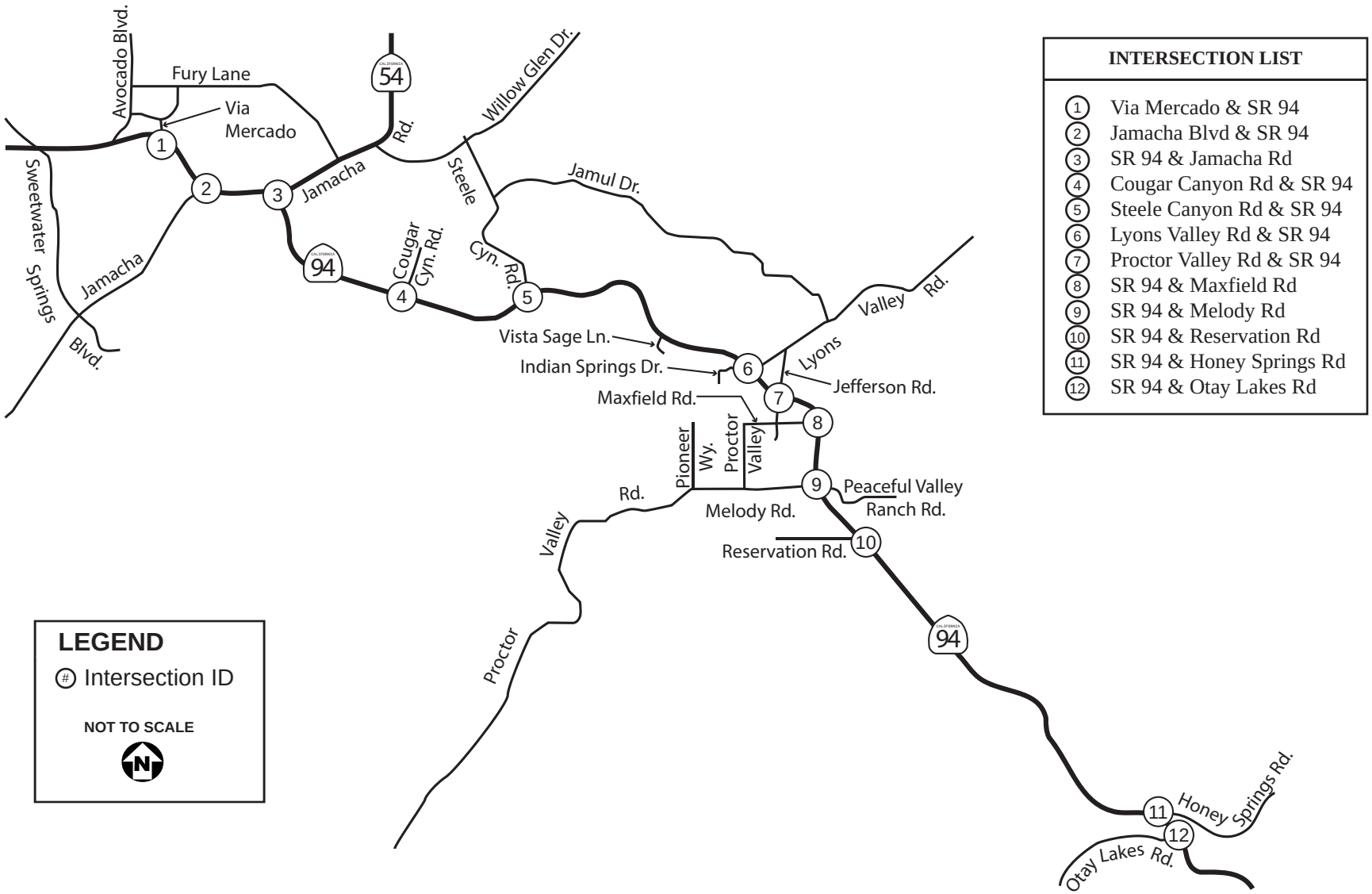


Figure 2.4-1
Study Intersections

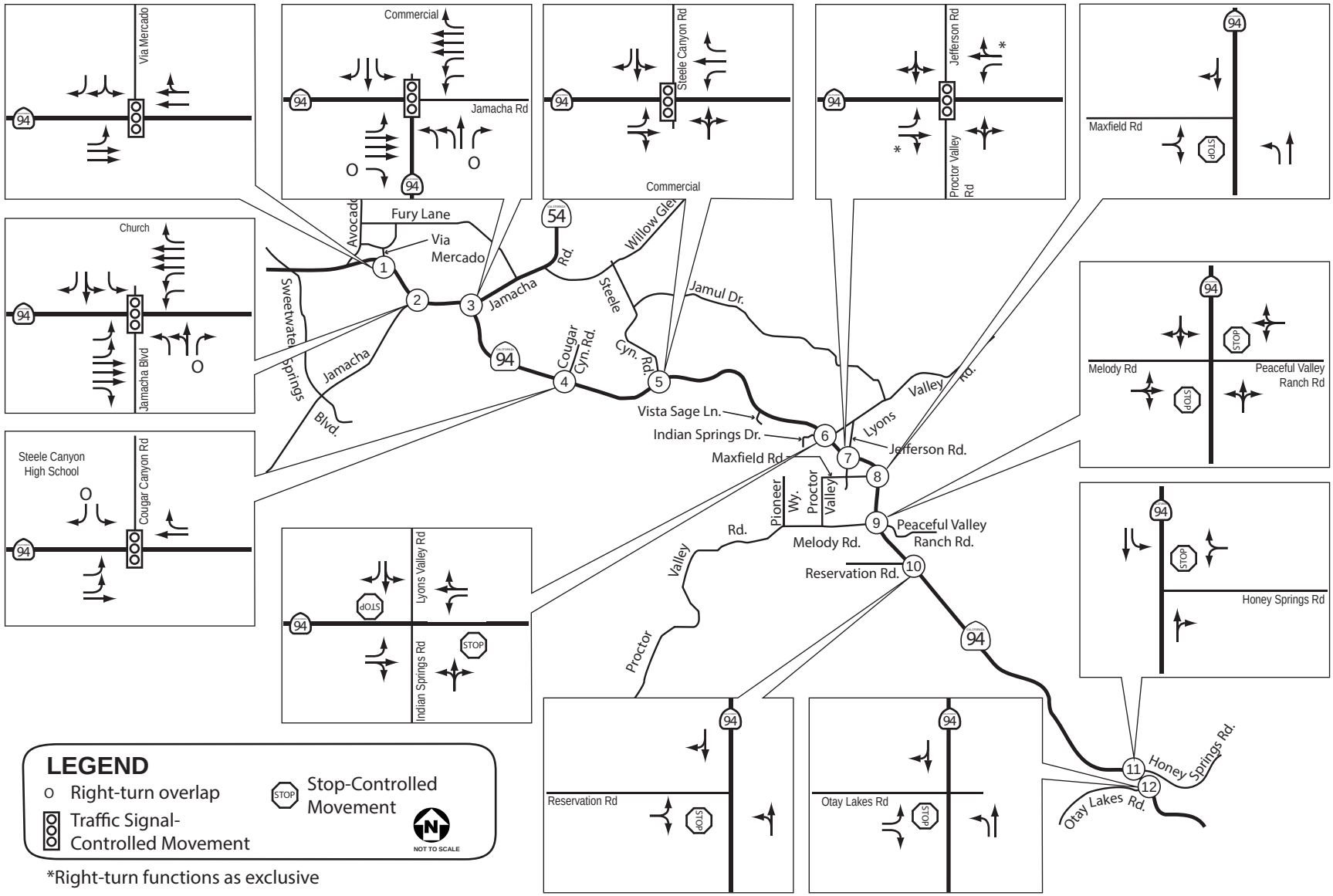


Figure 2.4-2
Existing Geometrics for the Intersections within the Study Area

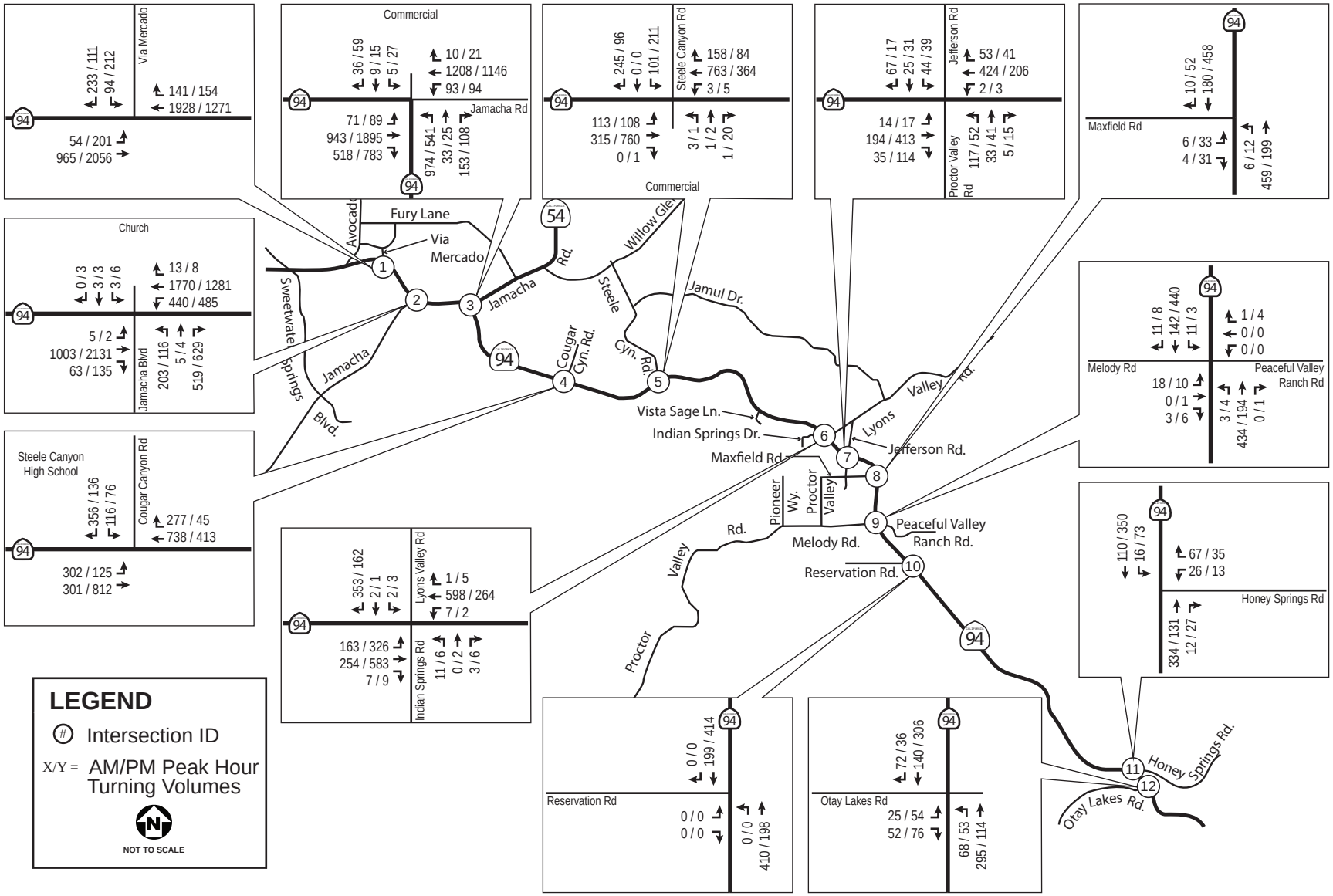


Figure 2.4-3
Existing Baseline Peak - Hour Traffic Volumes at the Study Intersections for a Typical Weekday

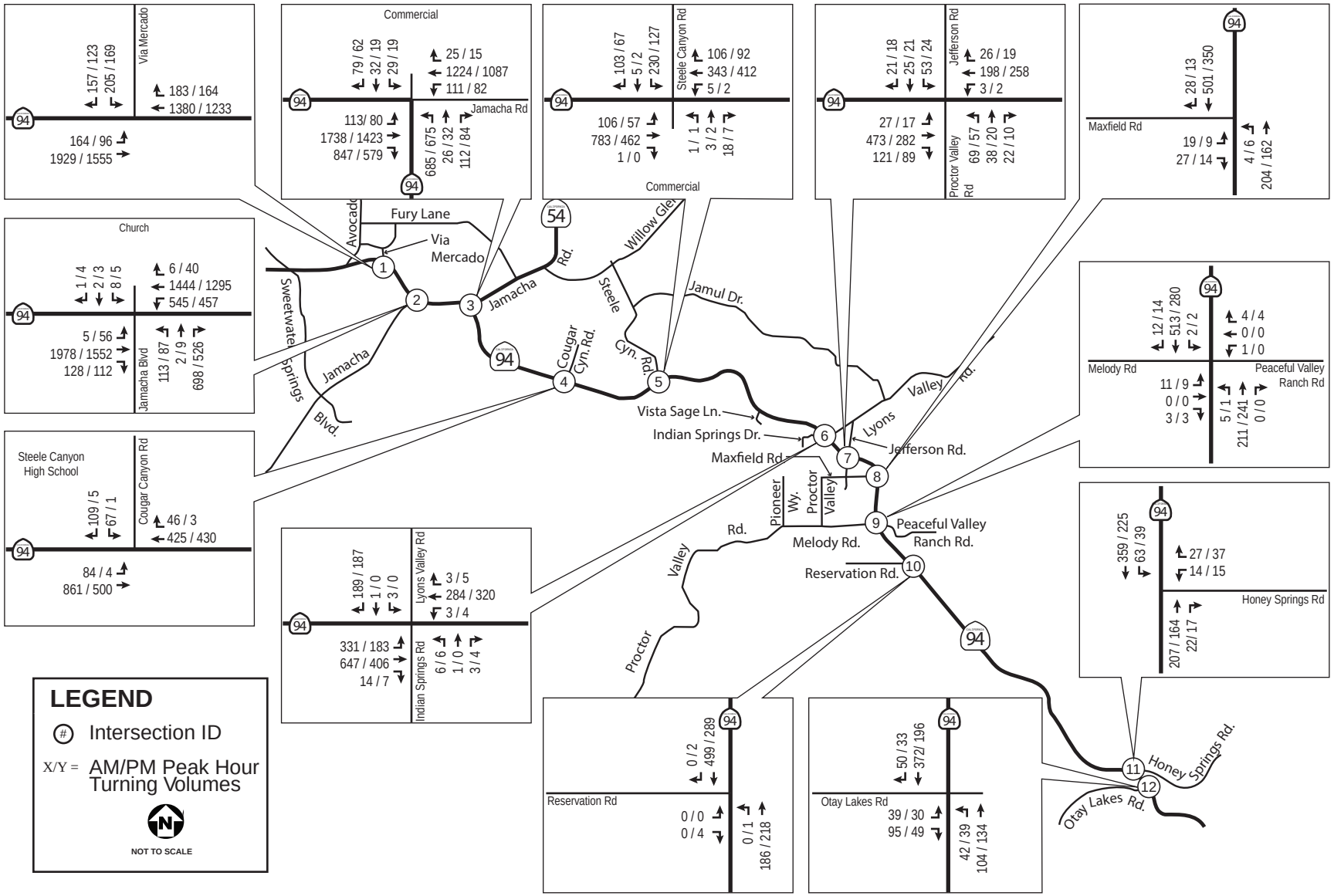


Figure 2.4-4

Existing Baseline Traffic Volumes at the Study Intersections for Typical Friday and Saturday Afternoon Peak-Hour Periods

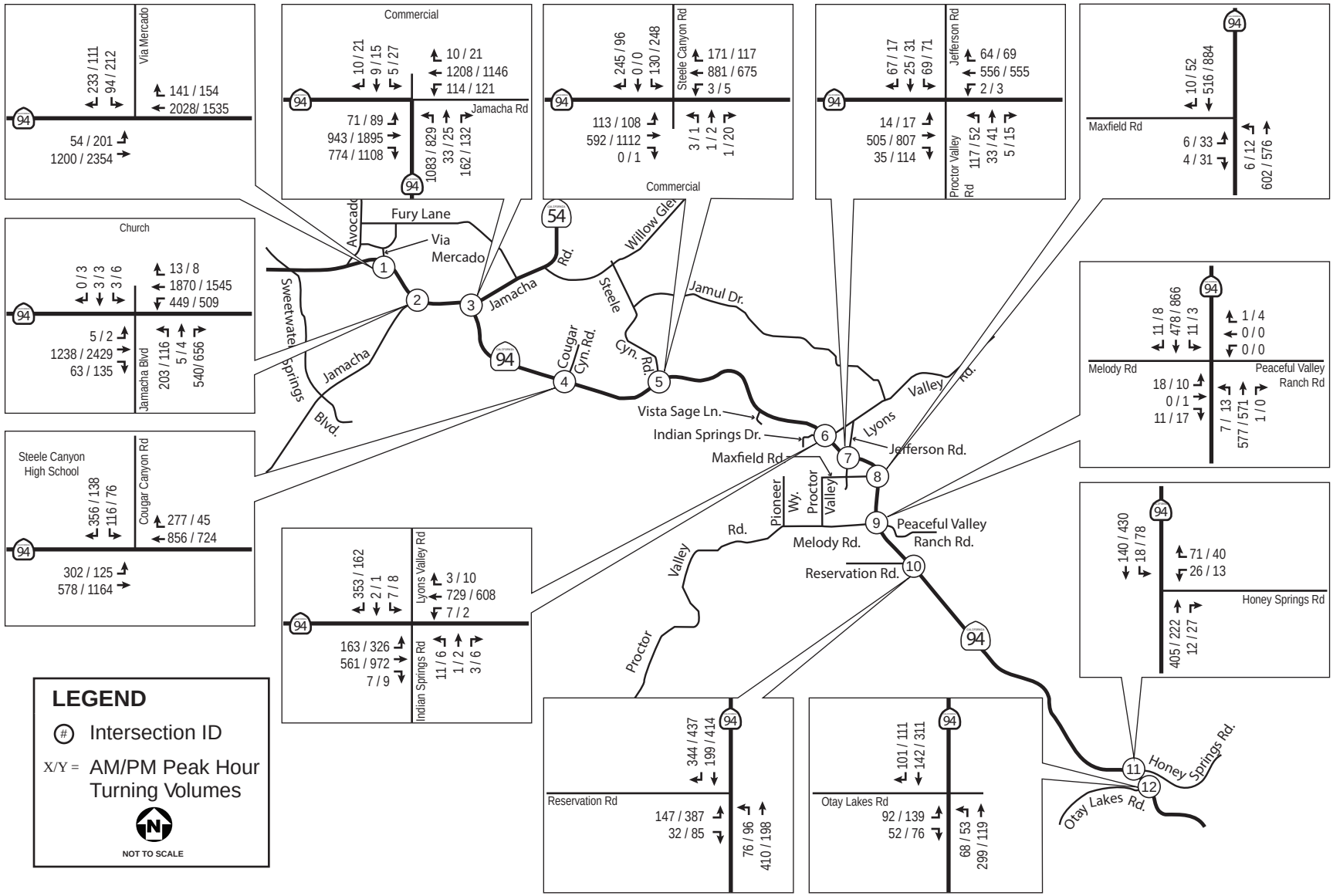


Figure 2.4-5

Existing Baseline with JIV Gaming Development Project Peak - Hour Traffic Volumes for Typical Weekday

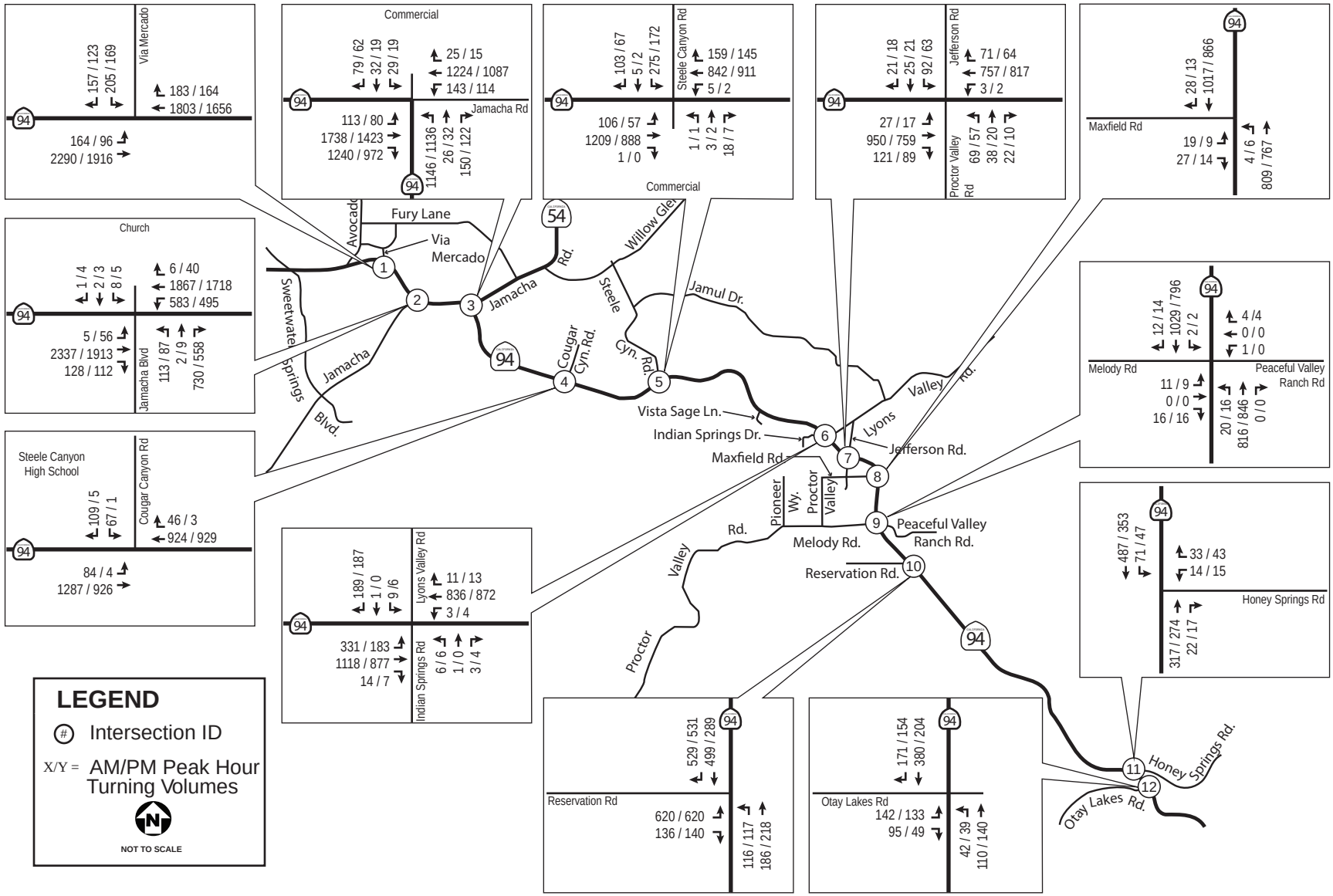


Figure 2.4-6

Existing Baseline with JIV Gaming Development Project Peak-Hour Traffic Volumes for a Typical Friday and Saturday

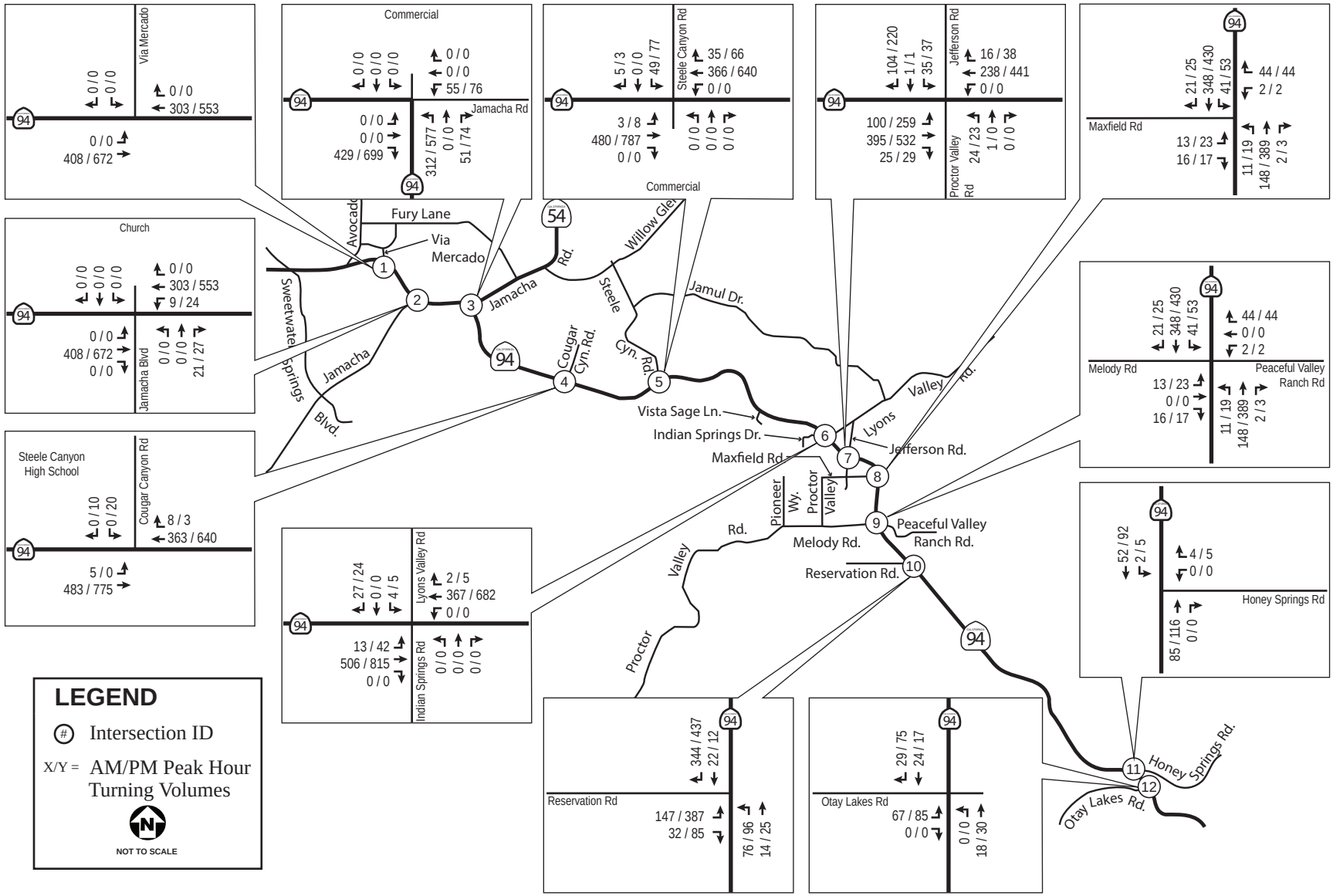


Figure 2.4-7
Cumulative Traffic Trip Generation for the Study Area Intersections

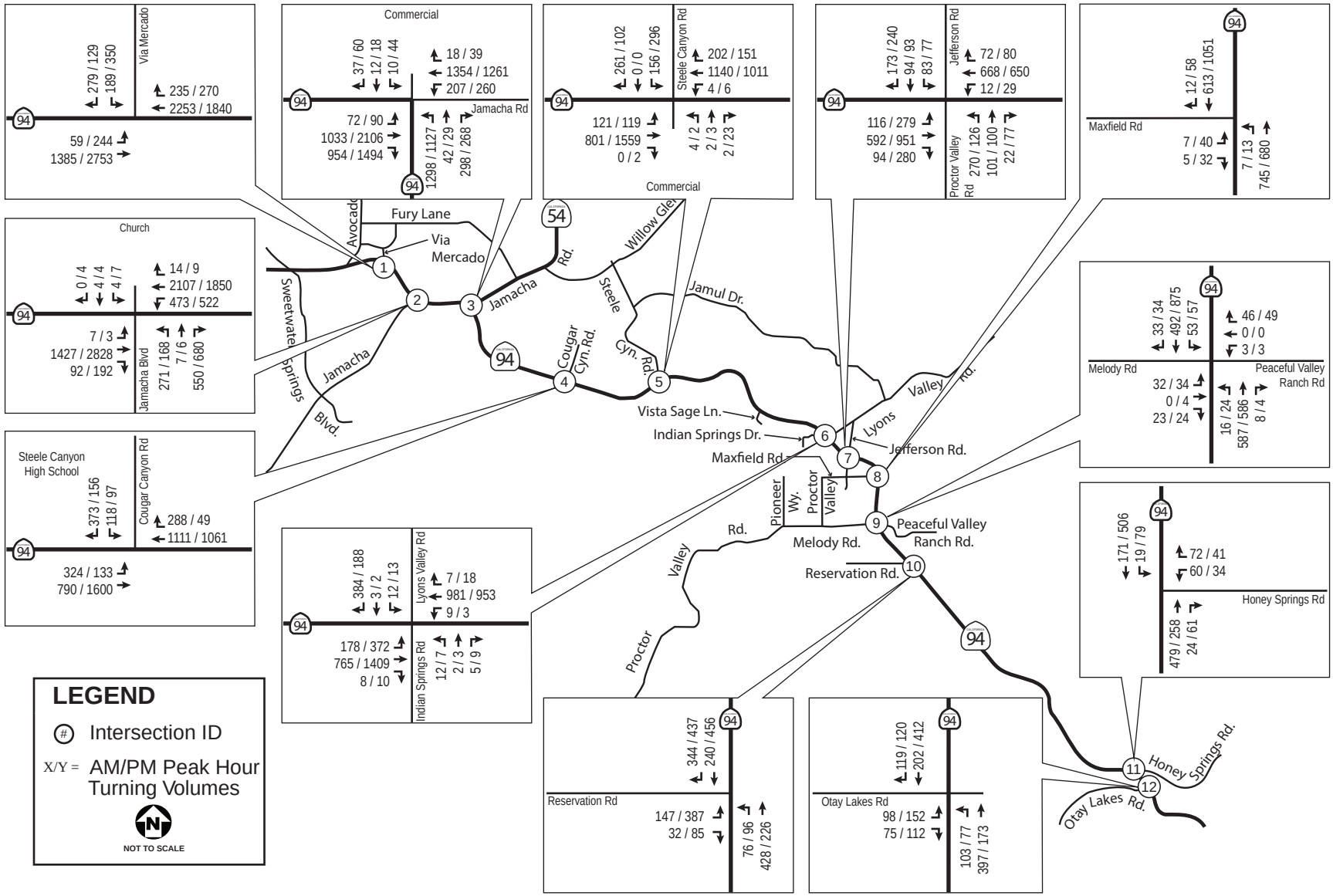


Figure 2.4-8

Near Term (2015) No Build Peak-Hour Traffic Volumes for a Typical Weekday

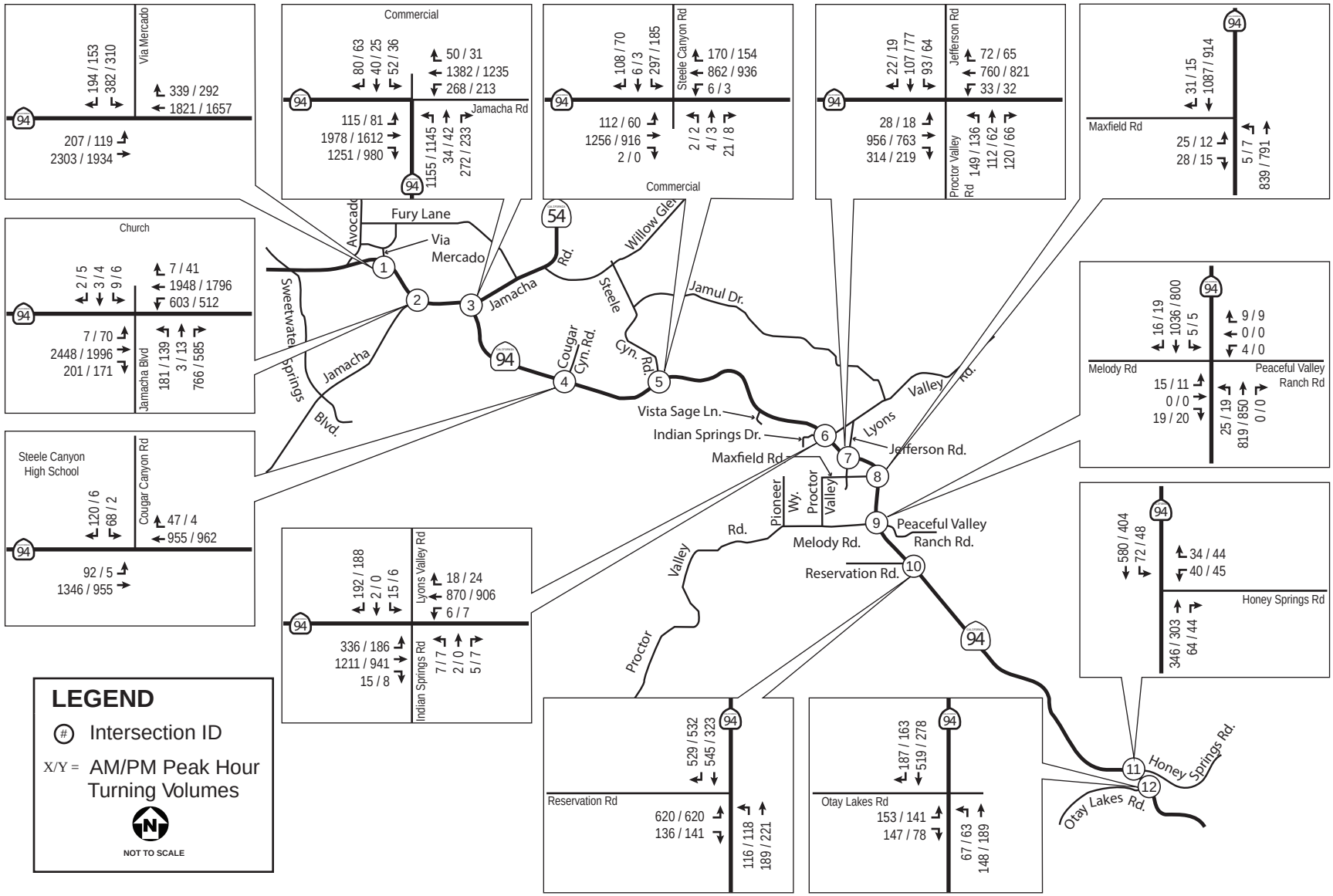


Figure 2.4-9

Near Term (2015) No Build Peak-Hour Traffic Volumes for a Typical Friday and Saturday

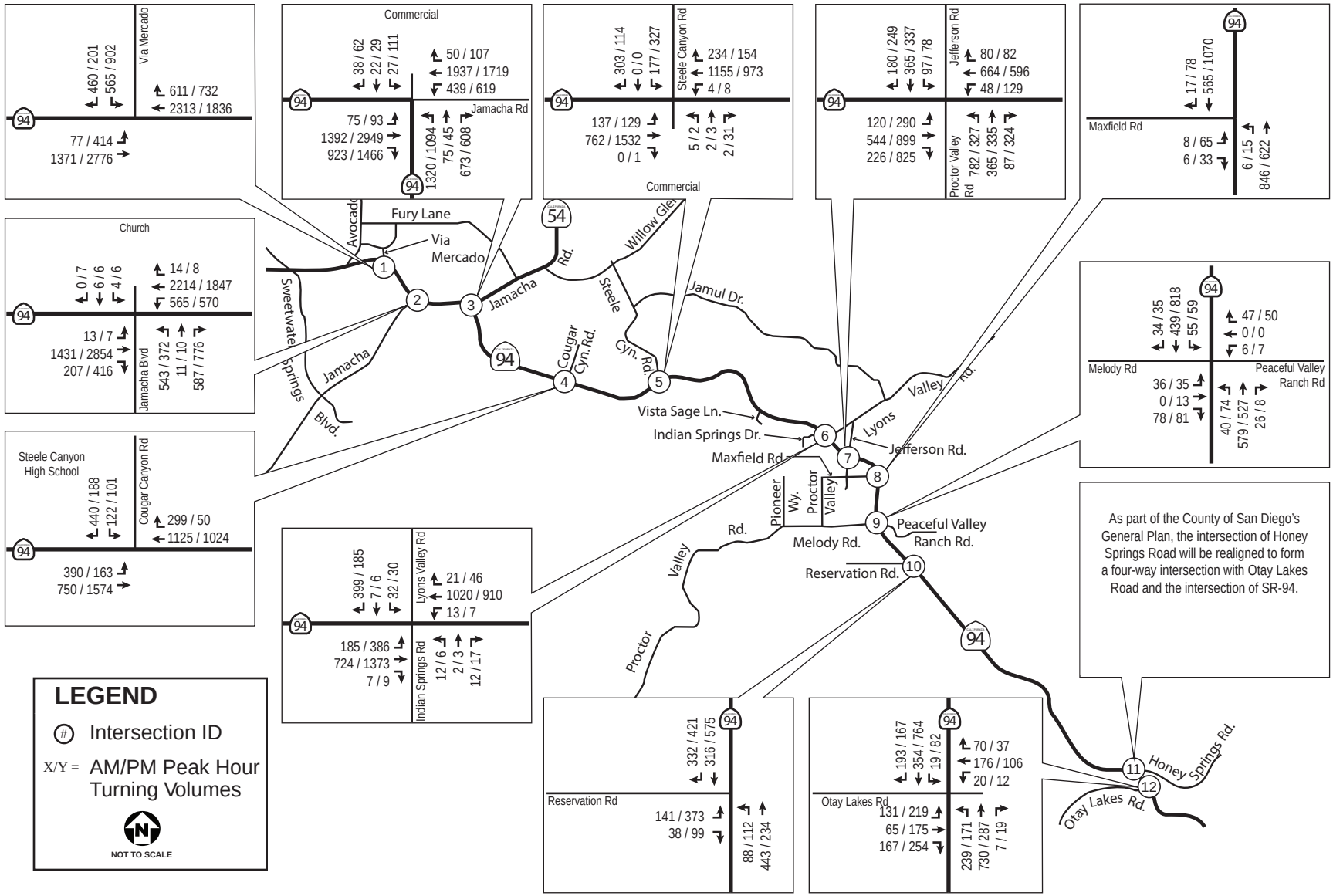


Figure 2.4-10

Horizon Year (2035) No Build Peak-Hour Traffic Volumes for a Typical Weekday

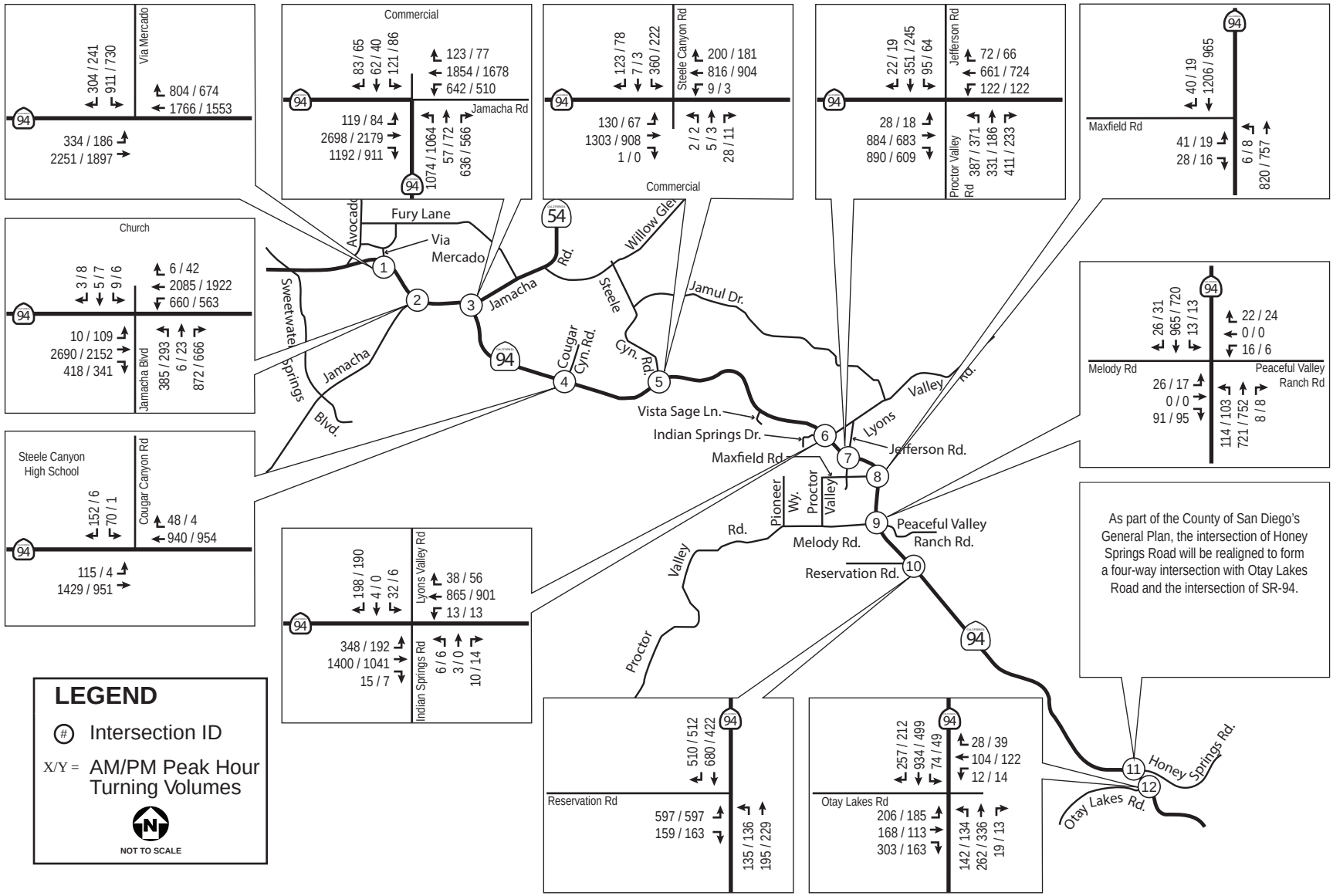


Figure 2.4-11

Horizon Year (2035) No Build Peak-Hour Traffic Volumes for a Typical Friday and Saturday

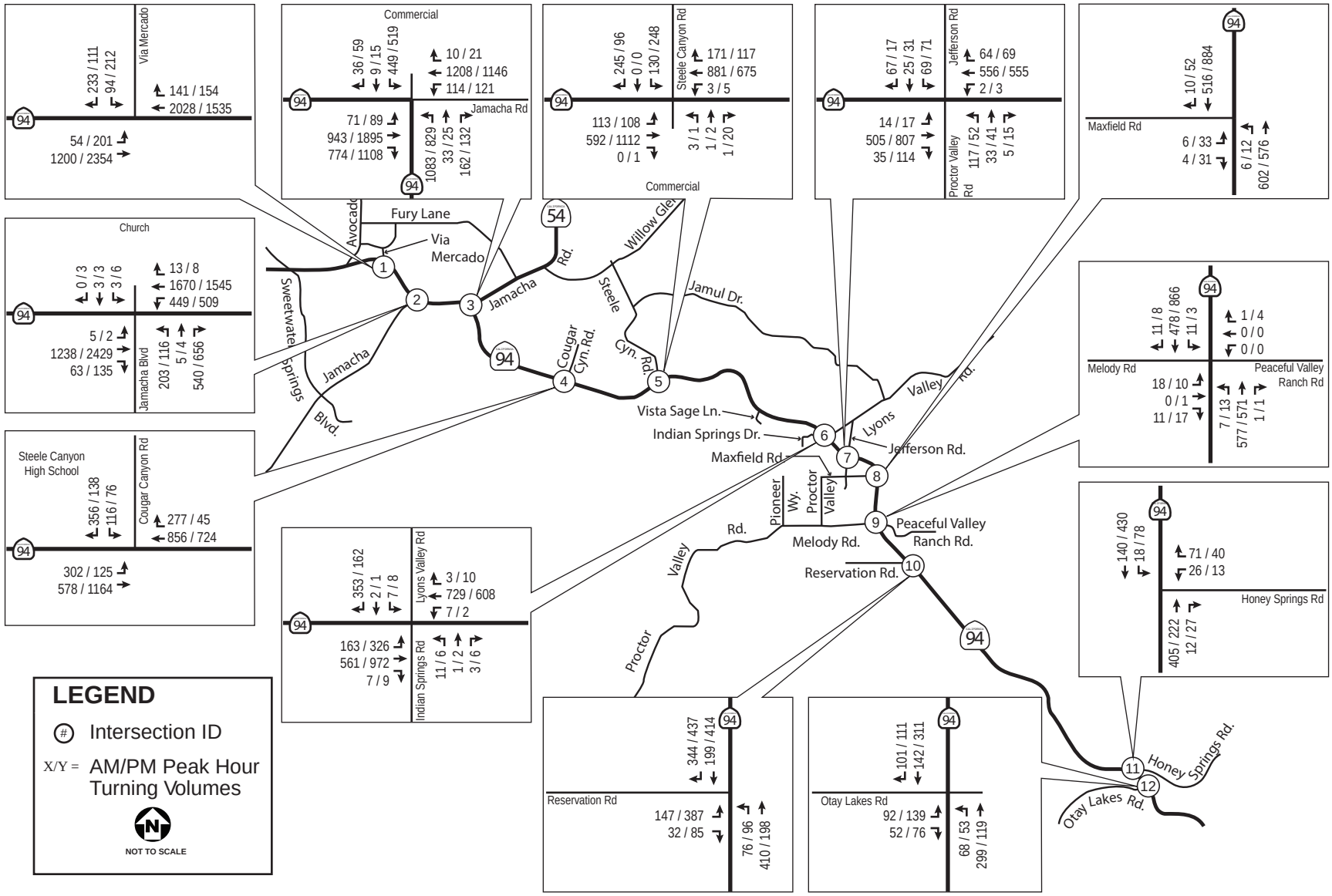


Figure 2.4-12

Existing with JIV Gaming Development Project Plus Proposed Project (Alts 1-2) Peak-Hour Traffic Volumes for a Typical Weekday

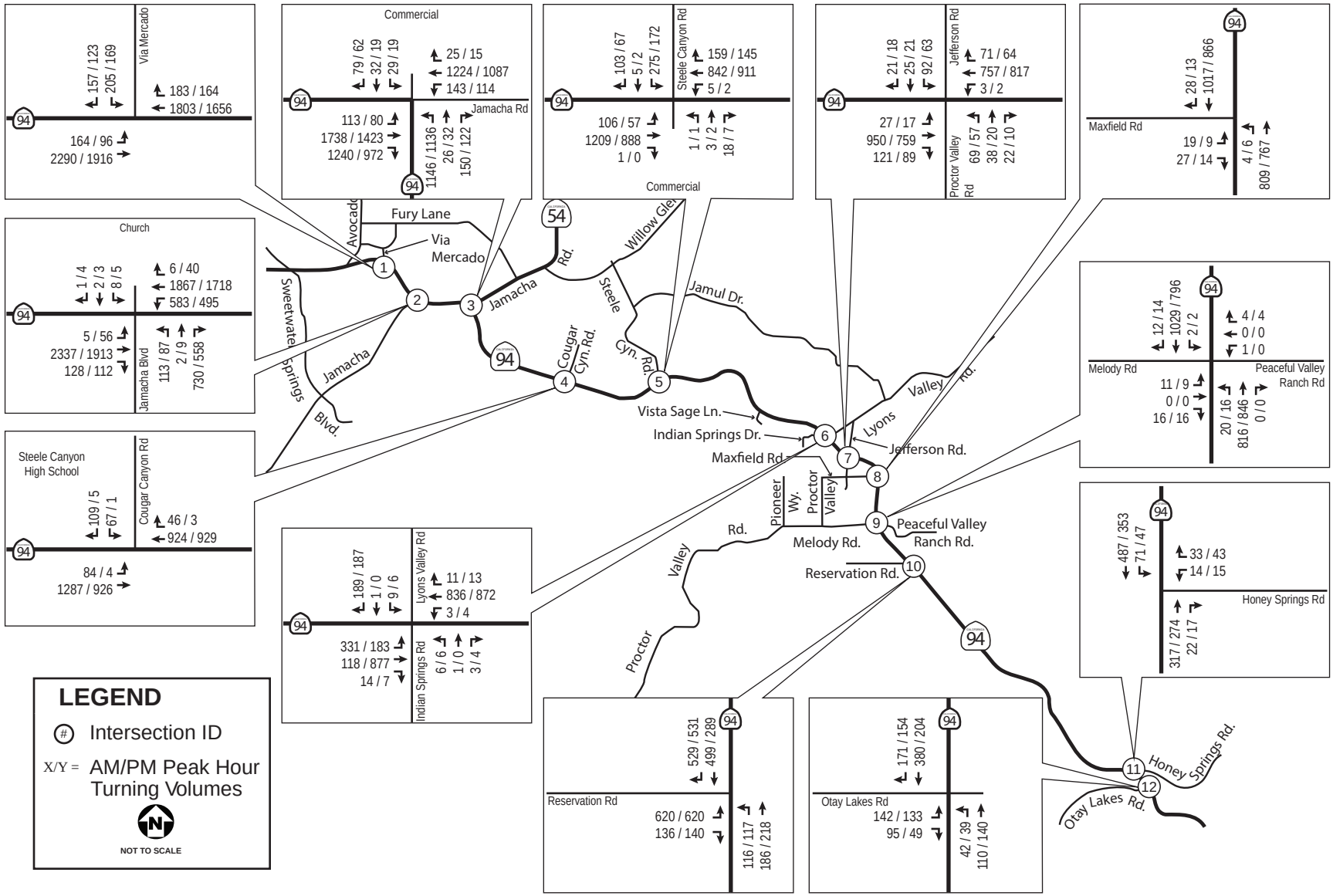


Figure 2.4-13

Existing with JIV Gaming Development Project Plus Proposed Project (Alts 1-2) Peak-Hour Traffic Volume for a Typical Friday and Saturday

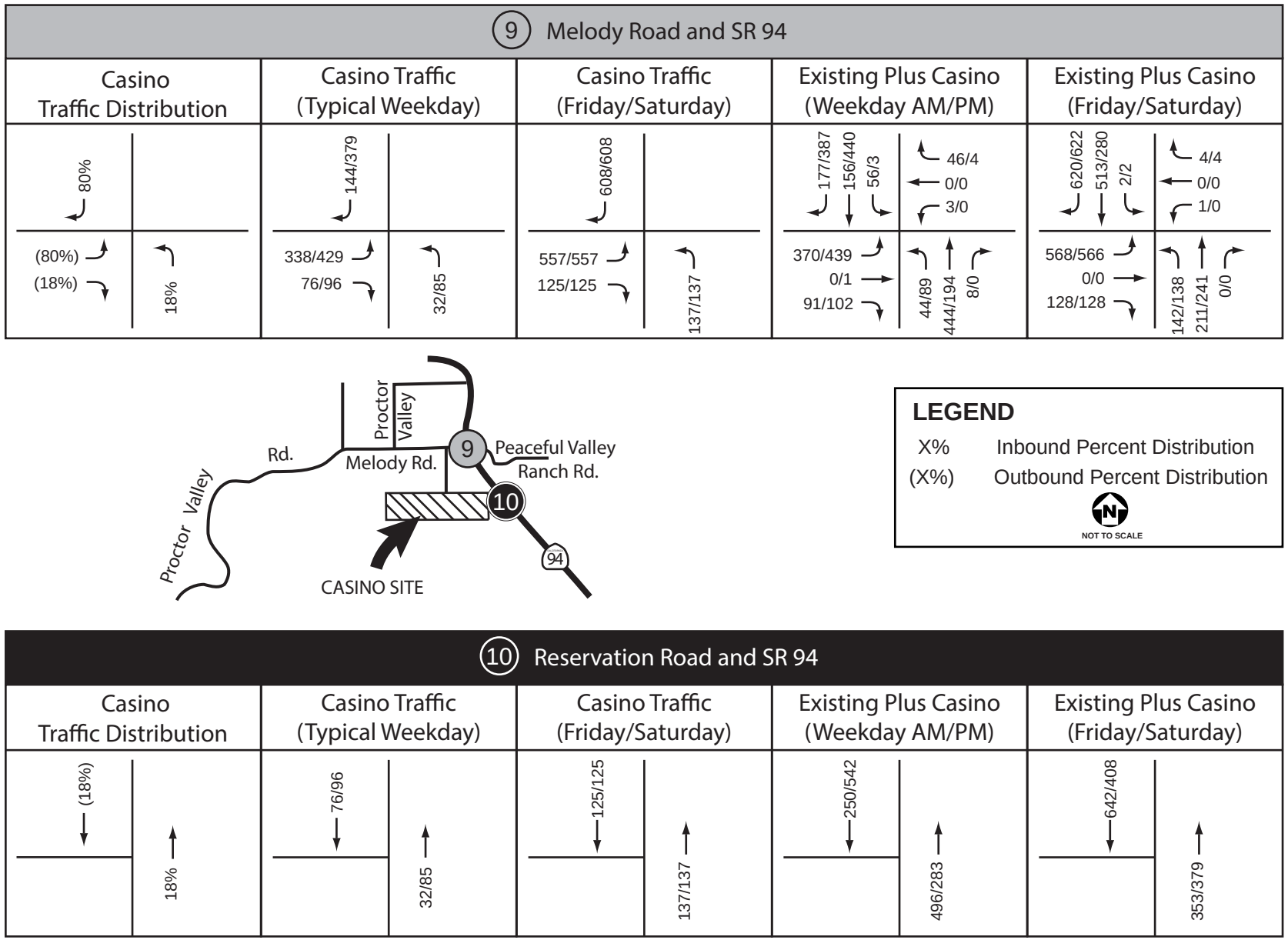


Figure 2.4-14
Existing with JIV Gaming Development Project Plus Proposed Project (Alt 3) Peak-Hour Volume Adjustments

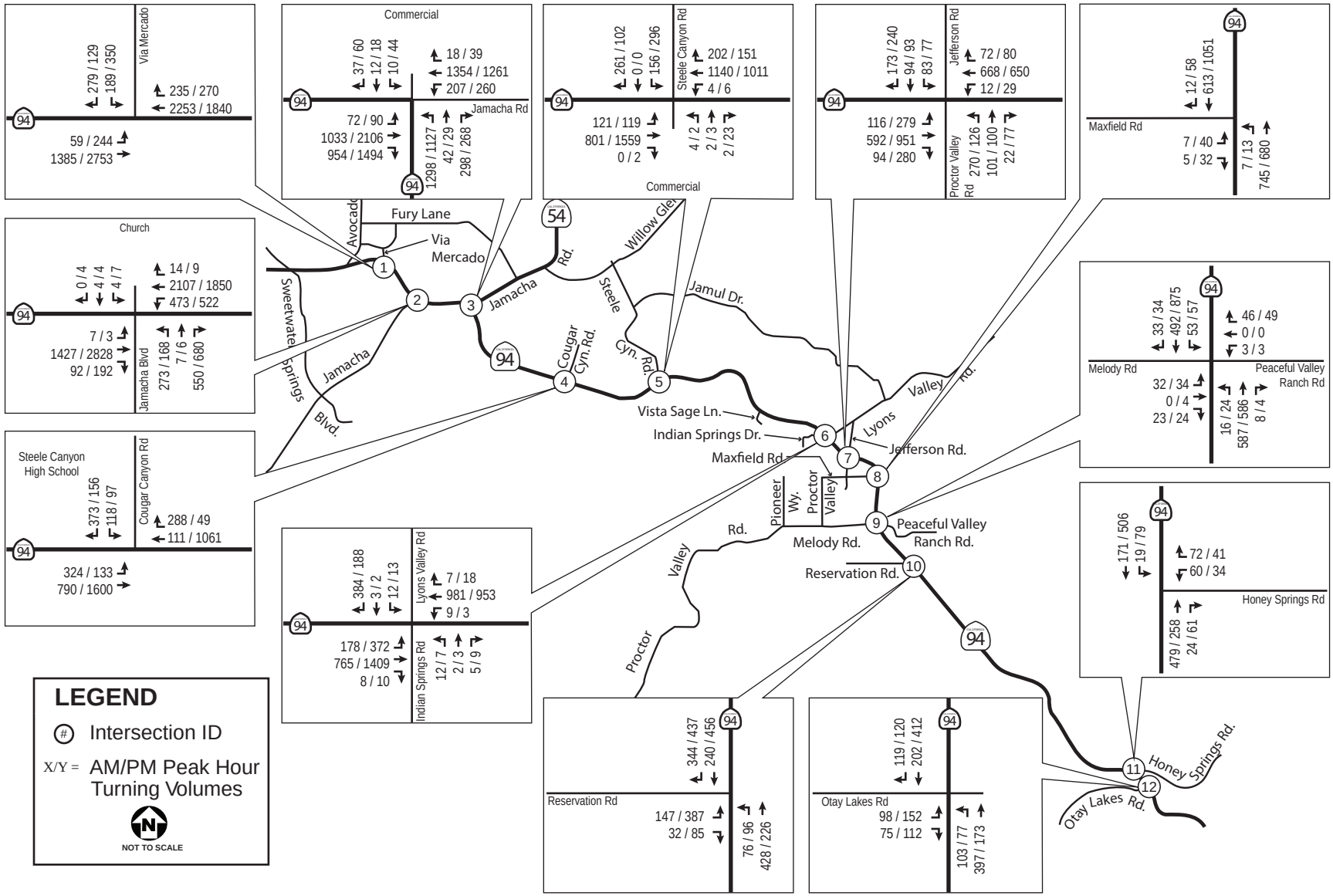


Figure 2.4-15 (Part 1)

Near-Term (2015) Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday (Alt. 1-2)

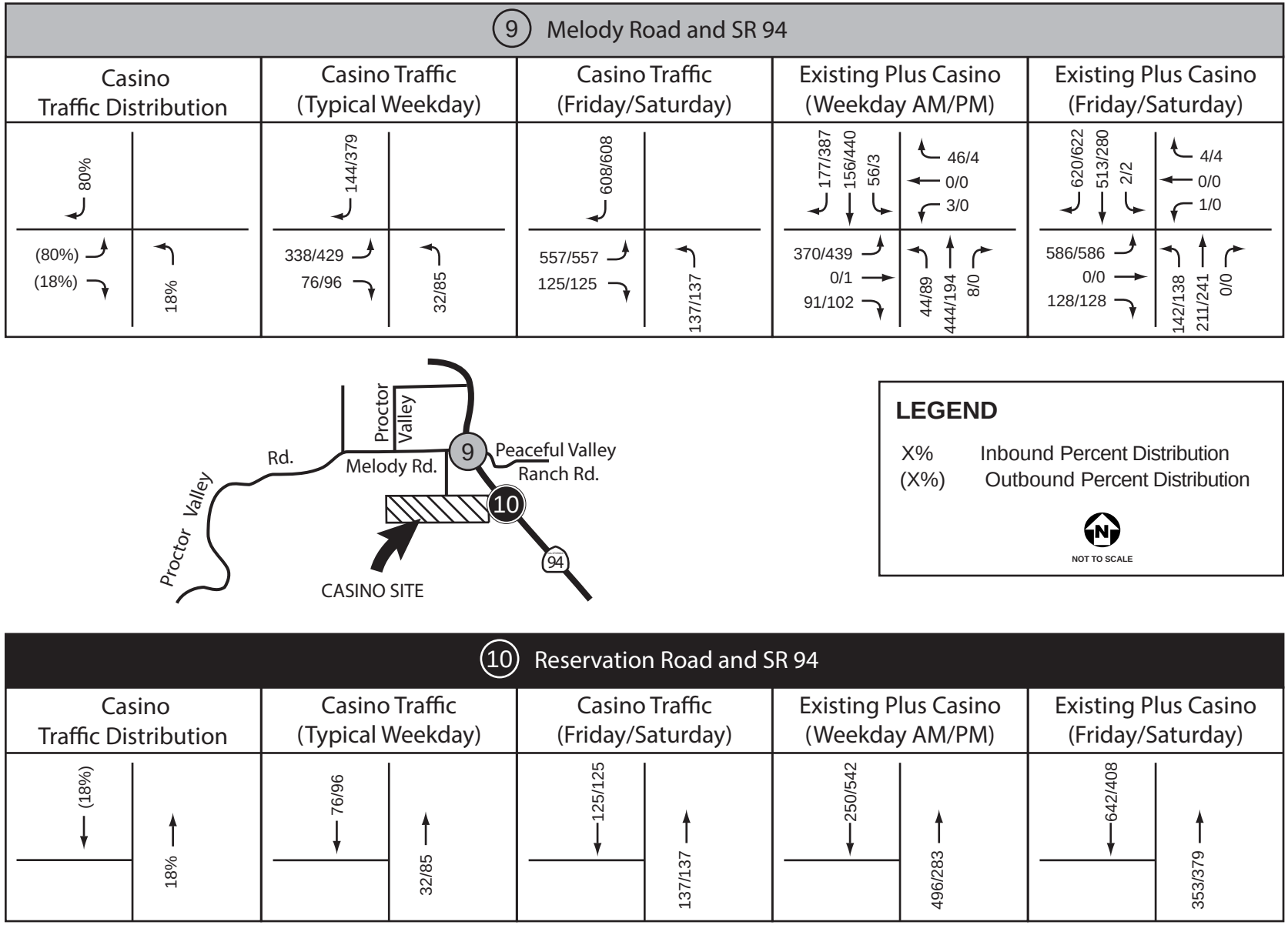


Figure 2.4-15 (Part 2)

Near Term (2015) Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday (Alt. 3)

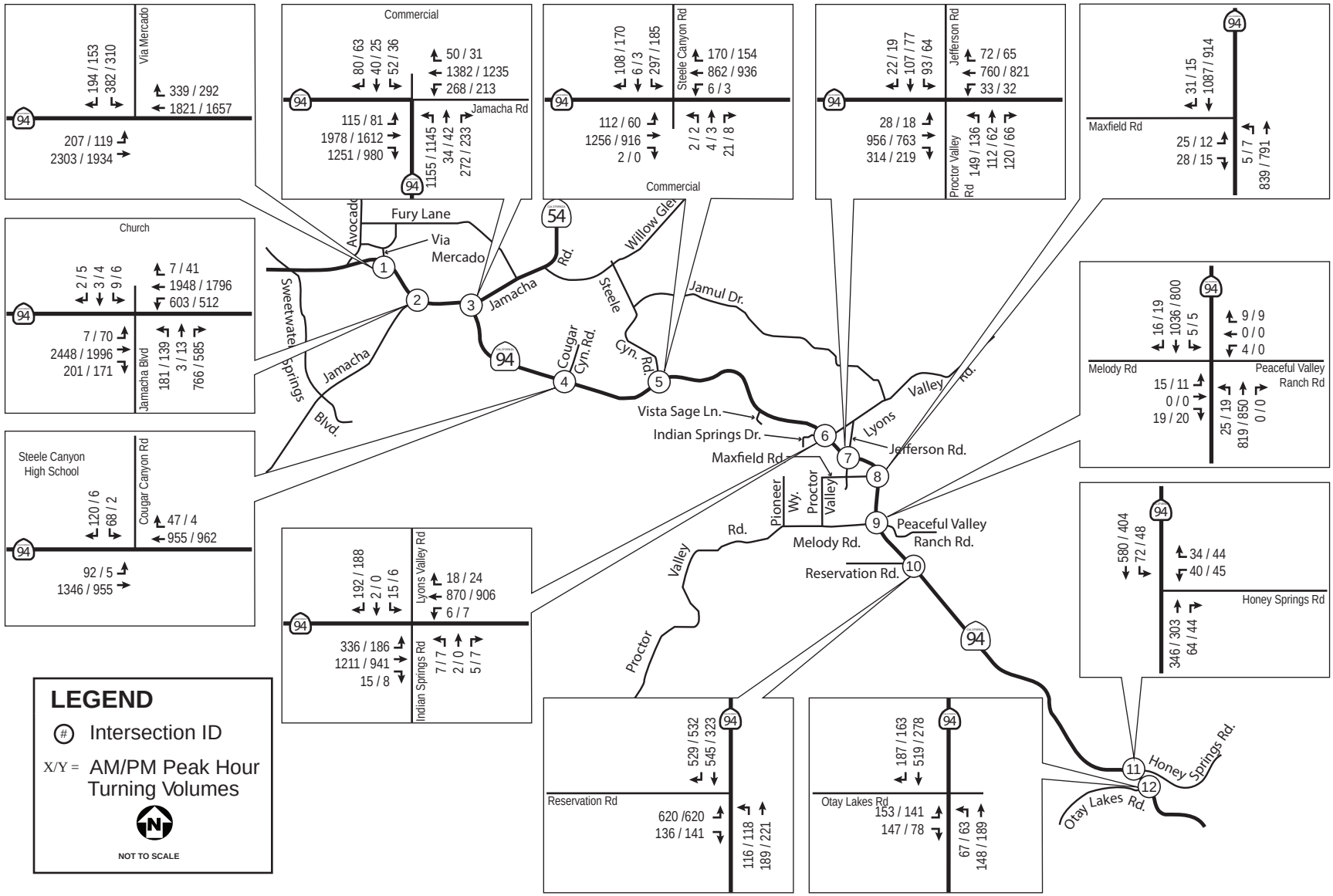


Figure 2.4-16

Near Term (2015) Traffic Volumes at the Study Intersections for a Typical Friday and Saturday Peak-Hour Periods (Alt 1-2)

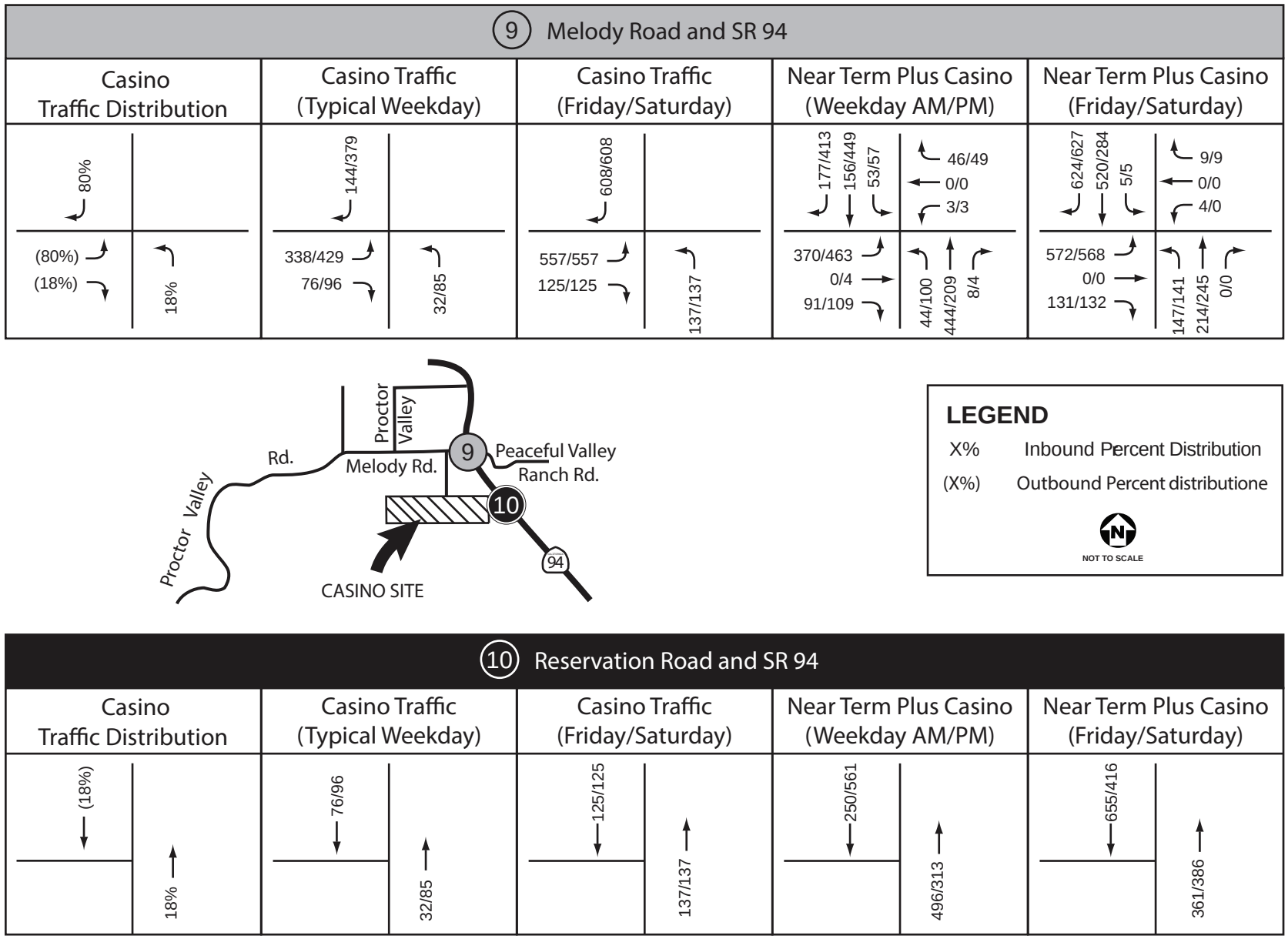


Figure 2.4-17

Near Term (2015) Peak-Hour Traffic Volume Adjustments: Alternative 3 Melody Road Access Alignment Project

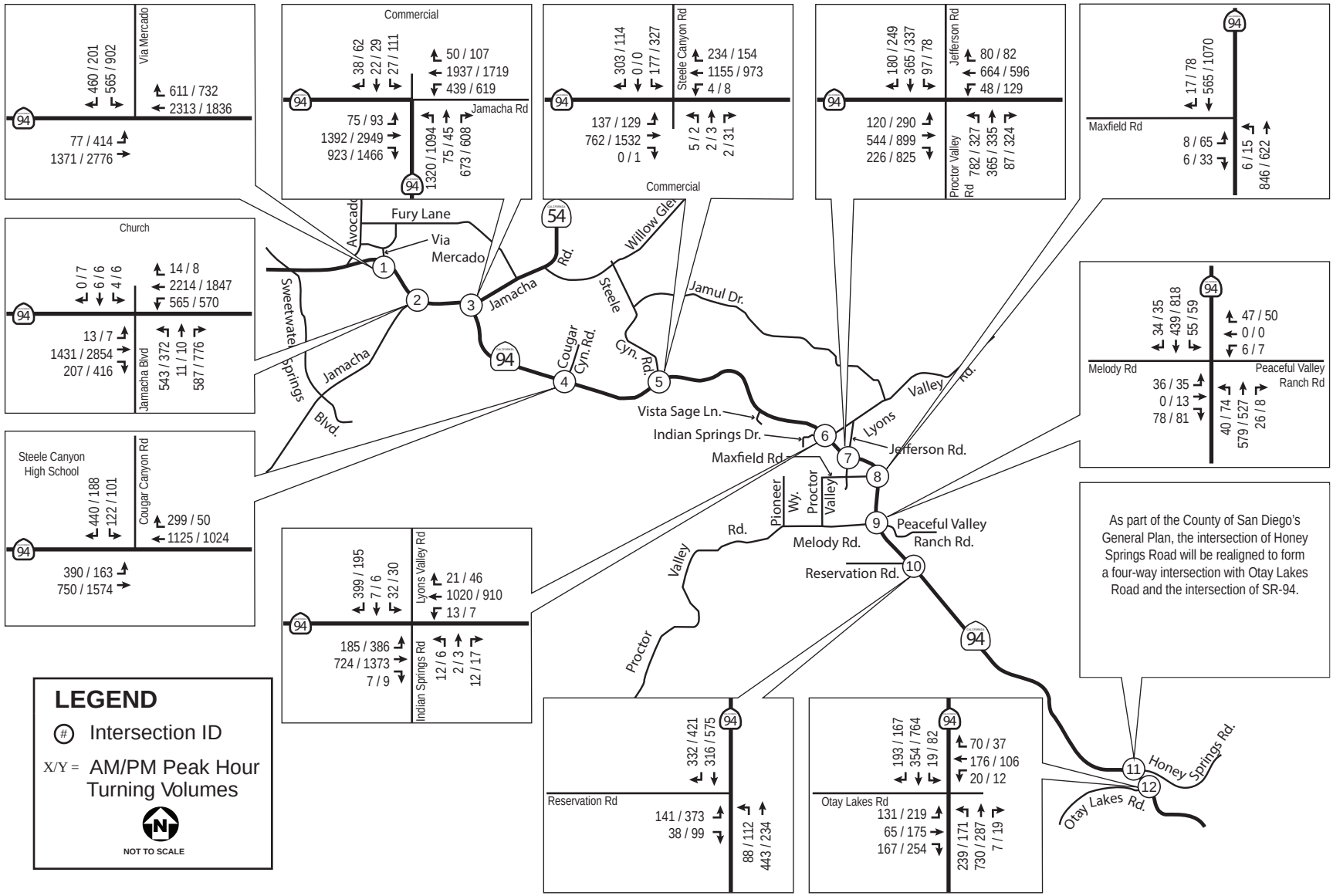


Figure 2.4-18

Horizon Year (2035) with Project Peak-Hour Traffic Volumes at the Study Intersections for a Typical Weekday (Alt 1-2)

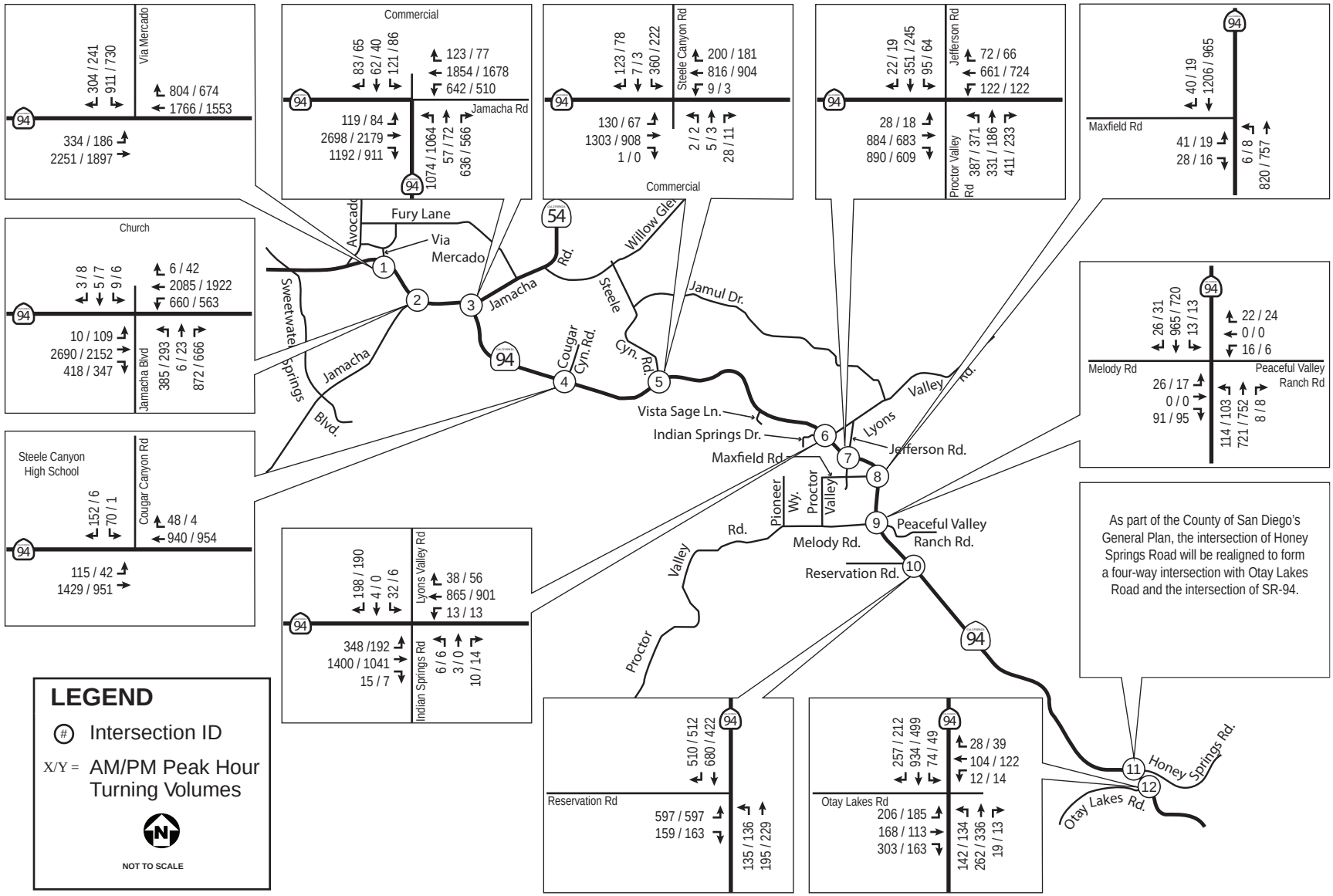


Figure 2.4-19

Horizon Year (2035) with Project Peak-Hour Traffic Volumes at the Study Intersections for a Typical Friday and Saturday

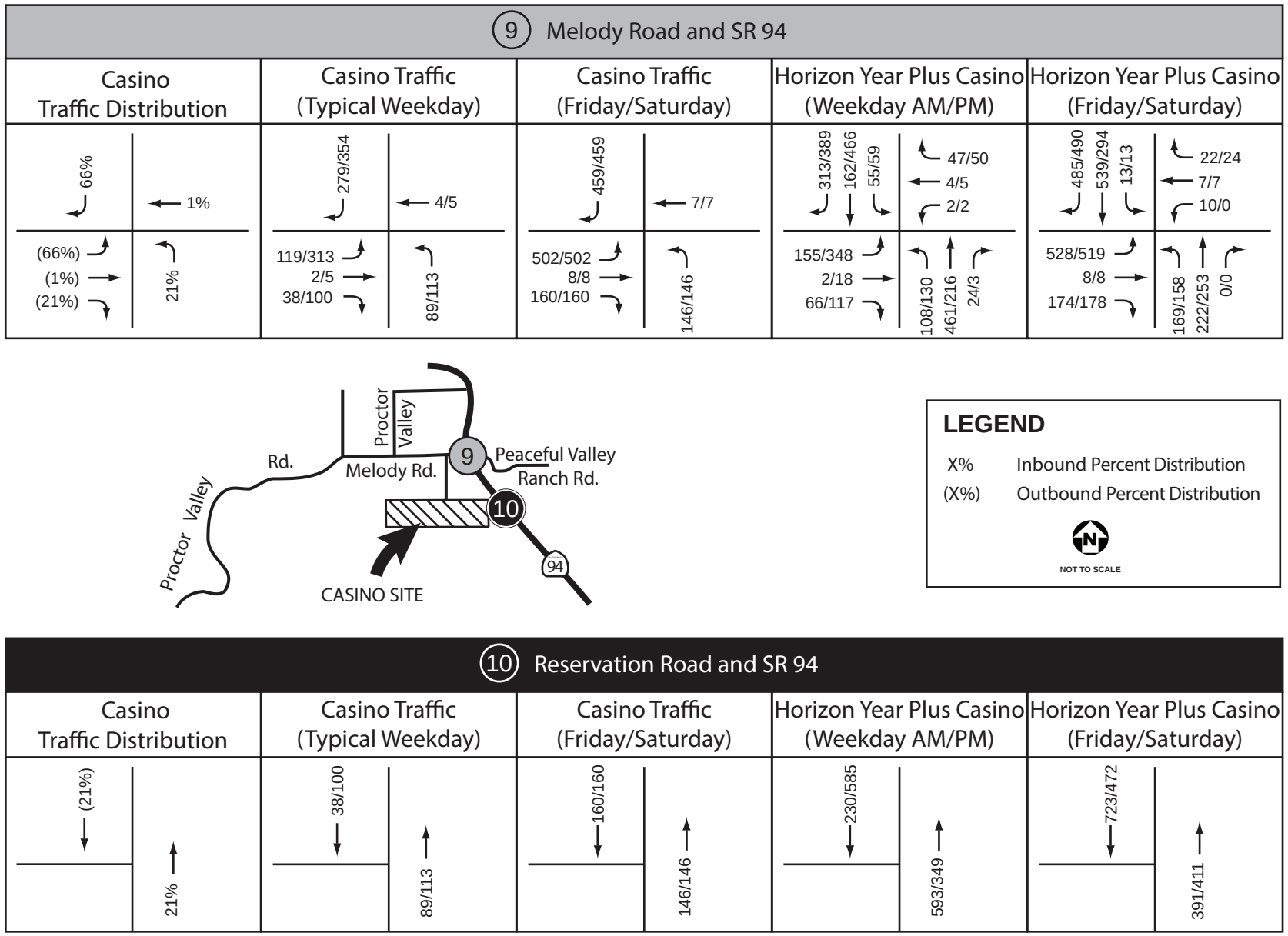


Figure 2.4-20

Horizon Year (2035) with Project Peak-Hour Traffic Volume Adjustments: Alternative 3 Melody Road Access Alignment Project

2.5 UTILITIES/EMERGENCY SERVICES

2.5.1 Affected Environment

Utilities

Above and below ground utilities including electrical, water, drainage, natural gas, traffic signals, utility poles and telecommunication lines are located within the Proposed Project limits. Underground sewage pipes are not located within the Proposed Project limits. Every intersection contains a combination of electrical facilities, such as electric/utility cabinets, electric vaults, pull boxes, overhead power poles, and traffic signals. Please see **Appendix G** for a complete list of utilities located within the Proposed Project ROW.

Water is provided from the Otay Water District, which is a member agency of the San Diego County Water Authority (SDCWA). The SDCWA is a member agency of the Metropolitan Water District of Southern California (MWD). The Otay Water District currently maintains two water mains in the area of the Access Road: 12-inch water main in Melody Road and a 16-inch water main under SR-94. Besides the water main located within the access road Proposed Project limits, two water meters and two wells are located within the SR-94/Steele Canyon Proposed Project limits.

Existing electrical and communication overhead utilities owned by San Diego Gas and Electric (SDGE) and Cox Communications are longitudinally adjacent to SR-94 along the east side of the existing highway. Along the west side of the highway are the existing communication overhead utilities owned by American Telephone and Telegraph (AT&T). San Diego Gas and Electric serves the Jamul area through one circuit via 12 kilovolt above ground power lines along SR-94.

AT&T provides all basic telecommunications services, including cellular communications, to the Proposed Project area. Pacific Bell currently has above ground phone lines along SR-94, which provide service to the homes in the area. Cox communications provides cable TV to the Proposed Project area.

Emergency Services

Fire and Emergency Services

The California Department of Forestry and Fire Protection (CDF) provides wildland fire protection and responds to all wildfires. The nearest CDF stations to the Proposed Project site are located in Jamul, Dulzura, and El Cajon.

The San Diego Rural Fire Protection District (SDRFPD) consists of 14 stations that protect primarily residential areas, and responds to calls for fire and medical emergencies. The majority

of responses are for medical emergencies. The fire stations consist of both paid and volunteer staff. The closest station to the Proposed Project site is the new Jamul Station, located on SR-94 east of the JIV Tribal Lands. The SDRFPD station typically provides first response services to any fire within the JIV Tribal Lands. The Jamul Fire Station allows for very quick emergency response times ranging from one to five minutes.

Various hospitals within San Diego County provide medical services. The nearest hospital to the Proposed Project site that would provide standard medical aid is Grossmont Hospital. The ambulance service provided in the area of the Proposed Project site is a joint venture between the SDRFPD and American Medical Response; Mercy Air provides emergency air transportation.

Law Enforcement

The San Diego County Sheriff's Department is the chief law enforcement agency in San Diego County. The Sheriff's Department handles law enforcement services in both the unincorporated area of the County and the nine cities that contract for law enforcement services with the Department.

The San Diego County Sheriff's Department provides general public safety and law enforcement service for the area of the Proposed Project site. The services are provided from the Lemon Grove Station, with jurisdiction over the Lemon Grove Command Area. The Lemon Grove station provides service to a portion of the unincorporated area (115,000 people) and has contract services with the City of Lemon Grove (25,000 people). The Jamul area currently consists of nine beat areas and is patrolled twenty-four hours a day by a one-person patrol unit from the Lemon Grove Station.

The California Highway Patrol is the chief law enforcement agency for traffic-related issues on public highways and roads leading up to the Proposed Project area. The station that services the Jamul area is located in the City of El Cajon. The El Cajon Station serves an extensive region of San Diego County from the border of the incorporated areas of the City of San Diego, El Cajon, Santee and Poway east to the northeastern, eastern, and southern borders of the County.

2.5.2 Environmental Consequences

Utilities

Alternative 1-3: Build Alternatives

Construction would require minor relocation of existing facilities including electrical, potable water, surface water drainage, natural gas, and overhead pole/telecommunication lines. These utility relocations are expected to occur within the Proposed Project limits (i.e.,

existing/proposed ROW) as shown in Chapter 1 Project Description. No sewage line relocation would occur within the Proposed Project limits of Alternative 1-3: Build Alternatives.

Underground Service Alert (USA) provides a free "Dig Alert" service to all excavators in California. An excavator calls USA, and that call automatically notifies all USA members (utility service providers) that might have underground facilities at the excavator's work site. In response, the USA member(s) would mark or stake the horizontal path of underground facilities, provide information about the facilities, and/or give clearance to dig. This safety service protects the excavator from personal injury and prevents underground facilities from being damaged.

The utility companies would be responsible for the timely removal or protection of any existing utility facilities located within the Proposed Project limits. The Joint Utilities Coordination Committee has developed procedures to assist cities, counties, and utilities in coordinating public improvement projects to alleviate scheduling and construction conflicts. Use of USA by the excavator, which is a standard construction practice, ensures that a less-than-significant impact to existing Utilities would occur.

When addressed on a regional level, the proposed improvements would not result in a significant increase in electrical demand. The only long term increase in electrical demand would result from the new signal located at the SR-94/Lyons Valley Road Intersection, which will employ energy-saving LEDs that consume a finite amount of electricity. Implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impact to utilities.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, Alternative 4 would not result in any utility relocations.

Emergency Services

Non-Access Road Intersections

Proposed improvements at the SR-94/Jamacha Boulevard, SR-94/Lyons Valley Road and SR-94/Maxfield Road Intersection would not close all traffic lanes or unduly restrict traffic flow through the intersections. Traffic operations would be maintained in all directions during construction activities. The construction of proposed improvements would necessitate temporary closure of the right turn lane at SR-94/Jamacha Road and SR-94/Steele Canyon Road intersections. At Jamacha Road, the existing eastbound through lane would temporarily be converted to a shared through/right-turn lane to accommodate traffic flow. The Steele Canyon Road Intersection would require that the existing median be converted to eastbound and westbound through lanes in order to accommodate traffic during construction activities.

Although traffic would be accommodated through construction zones of the Non-Access Road Intersections, emergency service response times could be temporarily delayed through these Proposed Project areas if no TMP were implemented; however, the required TMP ensures that emergency services would not be significantly delayed or interrupted during Proposed Project construction activities. Emergency response times are expected to improve post Proposed Project as intersections operations improve with the exception of the left bound turn onto SR-94 from Jamacha Boulevard. At this location, ample width for the safe passage for fire and emergency vehicles[1] is available along Jamacha Boulevard and SR-94 should fire, emergency and/or law enforcement vehicles need to access SR-94 northbound from Jamacha Boulevard under the Horizon Year scenario 2035. No significant emergency services impacts would result from Proposed Project implementation.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Improvements along the area covered by the access road alignments would temporarily interrupt traffic flow from Melody Road to SR-94. Access for emergency services would be maintained via use of Maxfield Road to Proctor Valley Road. Implementation of the TMP (Section 2.4.4(1)) would ensure that temporary construction related impacts are less-than-significant at the access road alignments. Post-Project conditions would improve traffic flow along this stretch of highway and at the SR-94/Melody Road Intersection; therefore, the Proposed Project would not result in emergency service impacts.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, this alternative would not impact baseline emergency service conditions.

2.5.3 Avoidance, Minimization and/or Mitigation Measures

The following measure would reduce emergency service impacts during construction activities:

(1) Implement TMP Mitigation 2.4.4(1).

[1] / Vehicles need a minimum of eight feet to pull over and away from the main line of traffic flow to accommodate the passage of fire, emergency and law enforcements vehicles.

2.6 VISUAL RESOURCES/AESTHETICS

A Visual Impact Assessment (VIA) *was prepared for the proposed project (March 2014) and is incorporated by reference.*

2.6.1 Regulatory Setting

CEQA establishes that it is the policy of the state to take all action necessary to provide the people of the state "with…enjoyment of *aesthetic*, natural, scenic and historic environmental qualities" (CA Public Resources Code [PRC] Section 21001[b]).

2.6.2 Affected Environment

The Proposed Project is located on SR-94 between Jamul and Dulzura in the Jamul/Dulzura Sub-region in San Diego County, California. The Project is located in the inland valley of southern California. The SR-94 corridor is designated as a Scenic Highway in the County General Plan Conservation and Open Space Element. The landscape is characterized by hills, valleys, riparian plant communities, boulders/rock outcroppings, naturalized grasses, Oak Trees, Sycamores and California Pepper Trees lining roadways. The land uses within the corridor are primarily rural—coupled with residential and open space, but also including areas of rural residential and commercial use, as well as the JIV Reservation.

The regional setting is rural, located approximately 23 miles east of downtown San Diego along SR-94. Traveling from San Diego, the Project begins in the town of Jamul, California, and extends south of Jamul into a transitional area between rural residential and designated open space corridor.

The Project location and setting provide the context for determining the type and severity of changes to the existing visual environment. The terms "visual character" and "visual quality" are defined below and are used to further describe the visual environment. The Project setting is also referred to as the "corridor" or "Project corridor," which is defined as the area of land that is visible from, adjacent to, and outside the highway right-of-way, and is determined by topography, vegetation, and viewing distance.

Scenic Resources

The SR-94 east of SR-125 to the eastern end of the route at I-8 is eligible to be designated as a State Scenic Highway. The corridor passes through the valley floor with views of rolling hills and distant peaks and ranges.

Visual Assessment Units and Key Views

The Project corridor is a single visual assessment unit wherein specific improvements are proposed at intersections along SR-94 and alternatives for improvements are proposed at areas south of Melody Road. The visual assessment unit has its own visual character and visual quality. It is typically defined by the limits of a particular viewshed. For this Project, the following visual assessment unit and its associated key views have been identified:

SR-94 (Campo Road) Visual Assessment Unit

The SR-94 Visual Assessment Unit includes portions of the SR-94 corridor encompassing approximately 0.9 miles in total length from approximately 1,300-feet North of Melody Road, and extending southward to approximately 1,800-feet south of Reservation Road. Cross streets include Las Palmas Road, Melody Road/Peaceful Valley Ranch Road, Daisy Road, and Reservation Road.

The SR-94 Visual Assessment Unit also encompasses several intersections where roadway improvements are proposed. The intersections include the SR-94 roadway widening north of Maxfield Road for approximately 1,600-feet would accommodate a new acceleration lane; the SR-94 and Jamacha Boulevard, the SR-94 and Jamacha Road, the SR-94 and Steele Canyon Road, and the SR-94 and Lyons Valley Road intersections.

The SR-94 Visual Assessment Unit viewshed is comprised of valley floor along the SR-94 corridor, naturalized grass-covered valley floor and rolling hills, boulder outcroppings, Oak tree communities, and views of distant foothill ranges. Please see **Figures 2.6-1** through **2.6-3**.

Key Views

Key Views from within the Project area include:

Key View #1: Southeast from SR-94, South of SR-94/Melody Road Intersection

Viewing Southeast from SR-94 just South of the Melody Road/SR-94 intersection. This view provides a vantage point for comparing the road access alignments for all the Alternatives, giving an idea of the proposed site improvements for each. Please see **Figures 2.6-1** through **Figure 2.6-4**.

Key View #2: West from the SR-94/Melody Road Intersection

Viewing West from the SR-94/Melody Road intersection. This view provides a vantage point for comparing the road access alignments for all the Alternatives, giving an idea of the proposed site

improvements, viewing from the intersection of SR-94/Melody Road. Please see **Figures 2.6-1** through **2.6-3,** and **Figures 2.6-5, 2.6-10, 2.6-13, 2.6-15** and **2.6-17**.

Key View #3: North from SR-94 toward the SR-94/Reservation Road Intersection

Viewing Northwest from SR-94 toward the Reservation Road/SR-94 intersection. This view provides a vantage point for showing a representative idea of the SR-94 road widening when coming from the Southeast, as well as the intersection at Reservation Road/SR-94 in Alternative 1. Please see **Figures 2.6-1** through **2.6-3,** and **Figure 2.6-6**.

Key View #4: Southeast from SR-94 toward the SR-94/Daisy Road Intersection

Viewing Southeast from SR-94 toward the Daisy Road/SR-94 intersection. The view from this vantage point gives a representative idea of the proposed improvements for Alternative 2, Options 1 through 3 approaching the Daisy Road/SR-94 intersection from the Northwest. Please see **Figures 2.6-1** through **2.6-3**, and **Figure 2.6-11**.

Key View #5: Southwest from Melody Road toward the Access Road

Viewing Southwest from Melody Road toward the location of the access road proposed as part of Alternative 3. This view provides a vantage point for showing a representative idea of the new access road from Melody Road to the Gaming Facility that is included in Alternative 3. Please see **Figures 2.6-1** through **2.6-3** and **Figure 2.6-18**.

Key View #6: Northwesterly direction from SR-94 toward the widening and slopes

Viewing Northwesterly direction from SR-94 toward the widening and slopes associated with the improvements at the intersection of SR-94 and Maxfield Road. This view provides a vantage point for showing a representative idea of the road widening viewing toward the Northwest. Please see **Figures 2.6-1** through **2.6-3** and **Figure 2.6-7**.

Key View #7: Northeasterly direction toward Lyons Valley Road

Viewing Northeasterly direction toward Lyons Valley Road. This view provides a vantage point for showing a representative idea of the road widening at the Lyons Valley Road intersection, viewing in a Northeasterly direction. Please see **Figures 2.6-1** through **2.6-3** and **Figure 2.6-8**.

EXISTING VISUAL RESOURCES

Resource change is assessed by evaluating the visual character and the visual quality of the visual resources that comprise the project corridor **before and after** the construction of the proposed project. Resource change is one of the two major variables in the equation that

determine visual impacts; the other is viewer response, discussed in later sections in 'Viewer Exposure' and 'Viewer Sensitivity'.

Existing Visual Character and Visual Quality

Method of Rating Visual Character

This section assesses the existing visual character of the resources in the project corridor. Visual character is assessed for 'Pattern Element' attributes such as form, line, color, texture, and is used to describe, not evaluate; that is, as these attributes are neither considered good nor bad. The 'Pattern Character' attributes are also assessed for dominance, scale, diversity and continuity, and is used to describe, not evaluate.

Pattern Elements

Form - visual mass or shape

Line - edges or linear definition

Color - reflective brightness (light, dark) and hue (red, green)

Texture - surface coarseness

Pattern Character

Dominance - position, size, or contrast

Scale - apparent size as it relates to the surroundings

Diversity - a variety of visual patterns

Continuity - uninterrupted flow of form, line, color, or textural pattern

The visual attributes are rated on a two-sided "pendulum" scale (+3 to -3, with 5 units of change possible) to measure contrasting qualities in each category. For example, the existing key views would each be assessed for the level of "curvilinear" and "rectilinear" attributes under the category "line" in the 'pattern elements' analysis. A second example, the existing key views would be assessed for the level of "small/human" and "large/monumental" attributes under the category "scale" in the 'pattern character' analysis. The levels of the pattern elements and pattern character were assessed and determined by the Landscape Architect that has prepared the Visual Impact Assessment.

Method of Rating Visual Quality

This section assesses the existing visual quality of the resources in the project corridor. Visual quality is assessed by identifying the vividness, intactness, and unity present in the project corridor. The three criteria for evaluating visual quality are defined below:

> Vividness - the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.
>
> Intactness - the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.
>
> Unity - the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

The existing visual quality attributes, vividness, intactness and unity, were assessed and determined by the Landscape Architect that prepared the Visual Impact Assessment, and rated on a scale of 1 to 5; 1 (low), 2 (moderately low), 3 (moderate), 4 (moderately high), and 5 (high).

Existing Visual Character and Visual Quality Summaries

<u>Key View #1: Southeast from SR-94, South of SR-94/Melody Road Intersection</u>

The existing view is comprised of a fine textured roadway facility (pavement) and soft irregular textural forms of the landscape on each side of the roadway. Generally, the form and alignment of the roadway follows the topography. Overhead power poles and transmission wires accentuate the alignment (line) of the roadway. The green Oak trees and the brown earth tones of the native grasses contrast with the gray monotones of the highway features. The continuity (intactness) of the landscape is disrupted by development, such as, graded slopes, fire station structures, existing asphalt parking lots, and abandoned bus stops, in the middleground. Vividness is moderate due to the memorable natural features, i.e. the rolling hills, native Oak trees, and rock outcroppings, in the view. Intactness is moderate due to the slight distraction of power poles, overhead transmission wires and development in the middleground. Unity is moderate due to the harmony between the landscape and man-made elements in the viewshed. Combining vividness, intactness, and unity, the resulting overall visual quality, as observed from Key View #1, can be rated as moderate. Please see **Figures 2.6-1** through **Figure 2.6-4**.

<u>Key View #2: West from the SR-94/Melody Road Intersection</u>

The existing view is comprised of a fine textured roadway and soft irregular textural forms of the landscape on the roadway edges. The trees located on both sides of Melody Road, and the

earthtones of the native grasses along the roadway edges, as well as the brown earthtones and green trees on the hillside contrast with the gray monotones of the asphalt roadway surface. Vividness of the view is moderate, due primarily to the vegetation partially obscuring the immediate view. While the view is distracted by the utility poles and overhead service lines, the foreground view of Melody Road, combined with the intact landscape of the surrounding hillside retains integrity of the view. The intactness therefore is moderate. Unity is moderate due to the harmony of the landscape and man-made elements in the rural scene. Combining vividness, unity and intactness, the resulting overall visual quality can be defined as moderate. Please see **Figures 2.6-1** through **2.6-3** and **Figures 2.6-5, 2.6-10, 2.6-13, 2.6-15** and **2.6-17**.

Key View #3: North from SR-94 toward the SR-94/Reservation Road Intersection

The existing setting is comprised of a fine textured roadway and soft irregular textural forms of the landscape along the roadway. Power poles, wires and fences visually accentuate the line of the roadway. Brown earthtones of the native grasses along the roadway contrast with the gray monotones of the asphalt roadway. The diversity of the landscape is shown in the varying landforms and mixture of boulder outcroppings. The continuity of the natural setting is interrupted by the highway, overhead utility lines and poles, and the pile and concrete panel retaining wall. The retaining wall is located at the intersection of SR-94 and Reservation Road. The visual character (landscape diversity tempered somewhat by manmade features) is considered moderately high. The views of the ridge line and rock outcropping create memorable features in the view shed. The vividness rating of the setting is moderate. Due to the visual encroachment of the highway paving, access control fencing, overhead utility lines and poles, signage, and off-facility structures (retaining wall), the intactness is moderate. While the harmony of the rural setting is interrupted by the highway facility, the placement of features unifies the setting. The unity therefore is moderately high. As a result, the visual quality is moderate. Please see **Figures 2.6-1** through **2.6-3** and **Figure 2.6-6**.

Key View #4: Southeast from SR-94 toward the SR-94/Daisy Road Intersection

The existing view is comprised of a fine textured roadway, irregular textural landscape forms and a low level of development located each side of SR-94. The alignment of the highway follows the surrounding topography. Overhead transmission lines and power poles align with the highway edges and accentuate the roadway. The earthtones of the surrounding hillsides contrast with the gray hue of the asphalt roadway and private drives. The existing visual character is considered moderately high. The ridge line views of distant mountains and interesting topographical features create a memorable visual setting. The existing vividness is moderately high. The visual encroachment of the overhead transmission lines and poles detract from the intactness of the setting. The intactness of the existing setting is considered moderate. While some site features visually compete with the natural setting (overhead transmission lines, poles),

others (highway alignment) harmonize with the surrounding topography. The existing unity is considered moderate. Combining vividness, unity and intactness, the resulting overall visual quality can be defined as moderate. Please see **Figures 2.6-1** through **2.6-3** and **Figure 2.6-11**.

Key View #5: Southwest from Melody Road toward the Access Road

The existing setting is comprised of a two-lane local roadway, irregular textural forms of the landscape, fencing, and overhead utilities. The surrounding hillside features rolling topography, interspersed trees and native grasses. The brown earthtones and green hues of the landscape dominate the view. The ridge line views of the nearby hillside communities and interesting topographical features create a memorable visual setting. The existing vividness rating is moderately high. While the view is distracted by the utility poles and overhead services lines, the foreground view of Melody Road combined with the surrounding landscape retains the natural character of the setting. The intactness is moderately-high. While low density residential housing and the local roadway have intruded into the rural setting, the composition of the scene is unified. Unity is considered moderately-high. Combining vividness, unity and intactness, the resulting overall visual quality can be defined as moderately high. Please see **Figures 2.6-1** through **2.6-3** and **Figure 2.6-18**.

Key View #6: Northwesterly direction from SR-94 toward the widening and slopes

The existing view is comprised of a smooth textured roadway, overhead transmission and utility poles, and irregular textured landscape forms in this foreground view. The view includes residential development in the distant hills. The manufactured textures and monotone color palette of the residences harmonize with the natural irregular textures and earth tone hues of the existing native vegetation. The ridge line views of the nearby hillside communities and interesting topographical features create a memorable visual setting. The existing vividness rating therefore is moderate. The visual encroachment of the overhead transmission lines and poles, and topographical changes detract from the intactness of the setting. The existing intactness of the setting is considered moderate. The existing unity is considered moderately-high. The existing visual character is considered moderate. The existing visual quality rating (vividness, intactness, and unity) is considered moderate. See **Figures 2.6-1** through **2.6-3** and **Figure 2.6-7.**

Key View #7: Northeasterly direction toward Lyons Valley Road

The existing view is comprised of hard, textured paving, fine textured surrounding built environment, and soft irregular textured landscape forms. The existing alignment of Lyons Valley Road creates two cut slope conditions along the north side of the road that is prominent. Overhead utilities and poles create a major distraction in the view. Brown earth tones and green

colors of native and ornamental landscapes contrast with the gray monotones of the asphalt roadway. Vividness of the view is moderately low due to the high distraction of built elements in the view. Intactness is moderate due to the cut-slope and the distraction of power poles, and overhead wires. Unity is moderate due to the moderate harmony of the landscape and manmade features in the rural scene. Combining vividness, unity and intactness, the existing visual quality can be defined as moderate. See **Figures 2.6-1** through **2.6-3** and **Figure 2.6-8.**

SR-94 and Jamacha Boulevard Intersection

The existing view is comprised of rural open space areas that transition to a suburban commercial environment. The roadway is a dominant feature in the view. The view is composed of hard, smooth textured roadway features that contrast with soft texture landscape forms at edges beyond the roadway. Upon approach to the intersection, an abrupt transition occurs, changing from the rural areas to suburban commercial that is comprised of typical architectural buildings, signage, lighting and commercial features. The architectural themes in the area contrast with the colors of the expansive roadway paving. Vividness is moderately low as there are few memorable features in the view. Intactness is moderately low due to some distraction of built features and signage elements in the view, yet with few overhead utilities present. Unity is moderate due to the low level of harmony of landscape and manmade features in the view. Combining vividness, unity and intactness, the existing visual quality can be defined as moderately low.

SR-94 and Jamacha Road Intersection

The existing view is comprised of rural open space located along the SR-94 corridor. The view is comprised of soft, irregular textured landscape features that are bisected by the hard, smooth textured paving of the roadway features. The landscape is the dominant feature within the view. Vividness of the view is moderately high due to the high contrast between landscape and roadway features in the view. Intactness is moderately high due to minimal distractions in the view. Unity is moderately high due to the high level of harmony between the landscape and manmade features in the rural scene. Combining vividness, unity and intactness, the existing visual quality can be defined as moderately high.

SR-94 and Steele Canyon Road Intersection

The existing view is comprised of the hard, smooth textured paving of Steele Canyon Road and SR-94 that bisects the soft, irregular landscape features of the local environment. The expanse of roadway paving, off-roadway paving and architectural features dominate the immediate foreground views. Background views are prominent with native landscape covered mountains visible from any direction when traveling the roadway. Overhead utilities and poles create some

distraction in the view. Brown earth tones and green colors of native and ornamental landscapes contrast with the gray monotones of the asphalt roadway. Vividness of the view is moderately low due to few memorable elements in the view. Intactness is moderate due to the minimal visual encroachment of features in the view. Unity is moderate due to the balanced harmony of landscape and manmade features in the rural scene. Combining vividness, unity and intactness, the existing visual quality can be defined as moderate.

VIEWERS AND VIEWER RESPONSE

Viewers are people whose views of the landscape may be altered by the proposed project either because the landscape itself has changed, or their perception of the landscape has changed. The 'viewer' is one of two variables that determine the extent of visual impacts that would be caused by the construction and operation of the proposed project. The other variable is the change to visual resources discussed below.

Viewer Exposure

Viewer exposure is one of two elements considered when evaluating "viewer response," which is a measure or prediction of the viewer's reaction to changes in the visual environment. Viewer response is the second major factor in the evaluation of the visual impacts of the Project (the first is "resource change," discussed below under impacts per each Alternative).

Viewer exposure is a measure of the viewer's ability to see a particular object. Viewer exposure has three attributes: location, quantity (number), and duration. Location relates to the position of the viewer in relationship to the object being viewed. The closer the viewer is to the object, the more exposure. Quantity (number) refers to how many people see the object. The more people who can see an object or the greater frequency an object is seen, the more exposure the object has to viewers. Duration refers to how long a viewer is able to keep an object in view. The longer an object can be kept in view, the more exposure. High viewer exposure helps predict that viewers would have a response to a visual change.

There are two major types of viewer groups for highway projects: highway neighbors and highway users. Each viewer group has their own particular level of *viewer exposure* and *viewer sensitivity*, resulting in distinct and predictable visual concerns for each group which help to predict their responses to visual changes.

Highway Neighbors (Views to the Road)

Highway neighbors are people who have views *to* the road. They can be subdivided into different viewer groups by land use. For example, residential, commercial, industrial, retail, institutional, civic, educational, recreational, and agricultural land uses may generate highway neighbors or viewer groups with distinct reasons for being in the corridor and therefore having distinct

responses to changes in visual resources. For this Project the following highway neighbors were considered:

Existing Residents, Businesses, Fire Station Personnel and JIV Occupants: Residents, business owners and patrons, fire station personnel and JIV Occupants ("Highway Neighbors") would have limited views of the Project due to the location of the Project and the positions from which they would be able to view it. The topography of the area typically obscures views towards the road from the viewing location of Highway Neighbors. The number of Highway Neighbors who would have views of the Project is approximately twenty to thirty homes or businesses at the outer edge of the neighborhoods, plus the fire station personnel. Those that have views would view the Project from backyards, patios, picture windows, driveways, drop-off and loading areas. The duration of time that residents would view the Project would range from several hours to less than a minute. Because of the limited number of Highway Neighbors, their position in relationship to the Project, and the varying duration of their viewing, the exposure rating for residents, businesses, and fire station personnel and JIV Occupants is considered to be moderately low.

Residents and business owners and patrons adjacent to the SR-94/Jamacha Road and SR-94/Steele Canyon intersections would have partial views of the proposed roadway improvements from the commercial businesses along the roadway at these two areas. Many of the businesses are fast food restaurants, or shops where patrons and employees would be indoors, resulting in a moderately low exposure rating to the Proposed Project features. It is anticipated that there would be hundreds to a couple thousand business employees or patrons that would experience the view of the Project for a minute to a few minutes at a time while at the neighboring businesses.

Highway Users (Views from the Road)

Highway users are people who have views *from* the road. They can be subdivided into different viewer groups in two different ways—by mode of travel or by reason for travel. For example, subdividing highway users by mode of travel may yield pedestrians, bicyclists, transit riders, car drivers and passengers, and truck drivers. Dividing highway users or viewer groups by reason for travel creates categories like tourists, commuters, and commercial haulers. It is also possible to use both mode and reason for travel simultaneously, creating a category like *bicycling tourists,* for example. For this Project the following highway users were considered:

Local Motorists**:** Local motorists that live in the region travel through the Project area regularly. They would view the road improvement Project from the roadway with direct view of the proposed improvements in the foreground. The number of the viewers would be approximately ten to seventeen thousand viewers per day, including residents and commercial users. The duration of exposure would be limited due to the short length of the Proposed Project,

approximately 0.9 miles, and the rate of speed at which they would travel, approximately 55 MPH. As a result, local motorists would have an exposure rating considered to be moderate.

Local motorists that travel through the SR-94/Jamacha Road and SR-94/Steele Canyon intersections would have direct views of the proposed roadway improvements in the foreground. The number of viewers would be approximately twenty thousand viewers per day at the SR-94/Jamacha Road intersection and several thousand for the SR-94/Steele Canyon intersection. The duration of exposure would be limited to a few seconds up to a minute due to the short length of the Proposed Project improvements at each intersection and the moderately low rate of travel, approximately 35 MPH. As a result, local motorists would have an exposure rating considered to be moderately low.

Regional Travelers/Tourists**:** These inter-regional highway users view the Project on a limited basis due to the infrequent travel on this section of highway. While generally, due to the limited destination points, the numbers of travelers/tourists are few, it is anticipated that the quantity of travelers/tourists would increase due to the future operation of the Gaming Facility. Despite the anticipated increase in travelers, the location, number of the travelers/tourists, the duration of the view, and the rate of travel (55 MPH), the exposure rating is considered to be low.

Regional travelers/tourists that travel through the SR-94/Jamacha Road and SR-94/Steele Canyon intersections would have direct views of the proposed roadway improvements in the foreground. The number of viewers would be less than 1000 viewers per day at the SR-94/Jamacha Road and SR-94/Steele Canyon intersections. The duration of exposure would be limited to a few seconds to a minute due to the short length of the Proposed Project improvements at each intersection and the moderately low rate of travel, approximately 35 MPH. As a result, local motorists would have an exposure rating considered to be moderately low.

Commercial Drivers**:** Commercial drivers would view the Project from the roadway on a regular basis (multiple times a day, daily, weekly, monthly). The number of viewers is high as SR-94 is a primary route for commercial drivers to access rural destinations in southeast San Diego County or to the border crossing at Tecate, Mexico. The duration of exposure would be limited due to the speed they travel, at approximately 55 MPH. Exposure rating is considered to be moderate.

Commercial drivers that travel through the SR-94/Jamacha Road and SR-94/Steele Canyon intersections would have direct views of the proposed roadway improvements in the foreground. The quantity of viewers would be approximately a few hundred viewers per this viewer group per day at the SR-94/Jamacha Road intersection and SR-94/Steele Canyon intersection. The duration of exposure would be limited to a few seconds to a minute due to the short length of the Proposed Project improvements at each intersection and the moderately low rate of travel,

approximately 35 MPH. As a result, local motorists would have an exposure rating considered to be moderately low.

Collective Viewer Exposure Rating

Collectively, viewers would have an exposure rating considered moderate. This weighted rating is based on the volumes per each viewer category and the different levels of exposure that each viewer group would have when viewing the Project.

Viewer Sensitivity

Viewer sensitivity is the second of the two elements considered when evaluating "viewer response," which is a measure or prediction of the viewer's reaction to changes in the visual environment. As noted above, viewer response is the second major factor in the evaluation of the visual impacts of the Project (the first is "resource change," discussed below under impacts per each Alternative).

Viewer sensitivity is a measure of the viewer's recognition of a particular object. It has three attributes: activity, awareness, and local values. Activity relates to the preoccupation of viewers—are they preoccupied, thinking of something else, or are they truly engaged in observing their surroundings. The more they are actually observing their surroundings, the more sensitivity viewers would have of changes to visual resources. Awareness relates to the focus of view—the focus is wide and the view general or the focus is narrow and the view specific. The more specific the awareness, the more sensitive a viewer is to change. Local values and attitudes also affect viewer sensitivity. If the viewer group values aesthetics in general or if a specific visual resource has been protected by local, state, or national designation, it is likely that viewers would be more sensitive to visible changes. High viewer sensitivity helps predict that viewers would have a high concern for any visual change.

<u>Highway Neighbors (Views to the Road)</u>

Existing Residents, Business Personnel, Fire Station Personnel and JIV Occupants

Residents, business owners, patrons and JIV Occupants would likely have a low sensitivity as there are few direct views of the Project from close proximity or from within businesses. These viewers would have a low awareness of the Project as it would be obscurely visible in their views. Patrons of the JIV facility would have a low awareness of the Project as they would likely be more focused on their gaming experience, occupational duties and immediate surroundings. The viewshed provides a wide open space scene that dominates the view where the Project would be minimally visible. The awareness/focus of view for this viewer group would be minimal due to the location and distance at which the viewer is from the Project. Highway Neighbors may be sensitive to the Project, to the extent that their values and attitudes may reflect

an opposition to the construction of the future private JIV Gaming Project and related development encroachment upon the rural character of the valley. Sensitivity rating is considered to be high.

Residents, business owners and patrons adjacent to the SR-94/Jamacha Road and SR-94/Steele Canyon intersections would likely be indoors and focused on their business at hand. Viewers, when outside, would be primarily focused on traffic, signage around the commercial businesses, or the greater surrounding environment, resulting in a low level of awareness. Residents, business owners and patrons would not be overly sensitive to the proposed improvements as Sensitivity ratings for this viewer group would likely be moderately low.

Highway Users (Views from the Road)

Local Motorists

Local motorists (drivers), due to their activity, would be focused on the roadway and traffic conditions in which they are traveling, but would have a high awareness of the Project in their immediate foreground as they travel through the Project. Passengers would have a more generalized awareness of their environment. Collectively, viewer sensitivity for this group would be high, as local motorists may be more sensitive to the encroachment of development upon the rural character of the landscape within the area (as opposed to motorists who are passing through the area). Sensitivity rating is considered to be high.

Local motorists (drivers) that travel through the SR-94/Jamacha Road and SR-94/Steele Canyon intersections, due to their activity, would be focused on the roadway and traffic conditions in their foreground views and have low awareness of the Project features. Passengers would have a more generalized awareness of their environment. Viewer sensitivity for this group at these two intersections would be moderately low as the Project improvements would not be considered as encroachment upon the rural character of the landscape, but roadway improvements that may simply improve circulation. Sensitivity rating is considered to be moderately low.

Regional Travelers/Tourists

Regional travelers and tourists, due to their activity, would have moderate viewer sensitivity to the Project. Though they travel infrequently through the area, their experience of the rural open space would be affected by the expansion of built features within the viewshed. This viewer group would likely have passengers that would be more sensitive to their surroundings and would be more preoccupied with the view than would drivers. Local values and attitudes would be low since this viewer group does not live or work in the community. Overall, this viewer group would likely be more focused on the views and natural landscape features beyond the Project than on the road improvement Project itself. Sensitivity rating is considered to be moderately low.

Regional travelers/tourists that travel through the SR-94/Jamacha Road and SR-94/Steele Canyon intersections, due to their activity, would be focused on the roadway and traffic conditions in their foreground views and have low awareness of the Project features. Passengers would have a more generalized awareness of their environment. Viewer sensitivity for this group at these two intersections would be moderately low as the Project improvements would not be considered as encroachment upon the rural character of the landscape, but roadway improvements that may improve circulation. Sensitivity rating is considered to be moderately low.

Commercial Drivers

Similar to regional travelers and tourists, commercial drivers, due to their activity, would have a moderate awareness to the changes in the highway or traffic conditions. They would be aware of the Project improvements, but likely would be preoccupied with their driving. They would have low sensitivity to encroachment of the Proposed Project on the local rural character. Commercial driver sensitivity rating is considered to be low.

Commercial drivers that travel through the SR-94/Jamacha Road and SR-94/Steele Canyon intersections, due to their activity, would be focused on the roadway and traffic conditions in their foreground views and have low awareness of the Project features. Viewer sensitivity for this group at these two intersections would be moderately low as the Project improvements would not be considered as encroachment upon the rural character of the landscape. Sensitivity rating is considered to be moderately low.

Collective Sensitivity Rating

Viewers would have a collective sensitivity rating considered to be moderately high. Specific to the collective sensitivity rating for highway neighbors and users, a weighted average is applied to the ratings. As a result, the anticipated volume of patrons and employees of the gaming facility and the number of local motorists traveling the Project area, were assessed a greater 'weight' to the rating. Following this analysis the exposure rating is considered moderately high. This rating is based on the volumes per each viewer subcategory and the different levels of sensitivity that each viewer subgroup would have when viewing the Project.

General Community Sensitivity

The community outreach efforts for this Project resulted in the receipt of over 1500 comments from Jamul residents via community meetings and form letters expressing concern for a variety of potential issues if the Project were constructed, thus indicating that community residents are sensitive to future development in the Jamul area within the SR-94 corridor.

The narrative description of viewer exposure and viewer sensitivity for each viewer group was merged to establish a collective viewer response that indicates a moderate viewer response to the proposed change in the visual environment.

2.6.3 Environmental Consequences

The Project Description identifies intersections, construction staging/storage and access areas; transit stops; road closures/detours; and construction phasing and schedule as common design features of the build alternatives. Given that these items apply to each intersection, the environmental consequences discussion below analyzes the Non-Access Intersections and Alternatives 1-3: Access Road Alignments assuming the inclusion of the other common features.

Impacts to Visual Resources

Non-Access Road Intersections

The impact assessment below for Non-Access Road Intersections is broken down by individual intersection:

SR94/Jamacha Boulevard Intersection

The roadway improvements proposed at the SR-94/Jamacha Boulevard intersection is primarily roadway restriping work and minor signal modifications. The change to existing visual character of the SR-94 Visual Assessment Unit (at SR-94/Jamacha Boulevard Intersection) would be low. The change to existing visual quality would be low. The Collective change to existing visual character and quality would be low. Viewer response would be moderately low. The low change to existing visual resources and moderately low response would result in a moderately low visual impact that is considered less-than-significant.

SR94/Jamacha Road Intersection

The roadway improvements proposed at the SR-94/Jamacha Road intersection would create an increase in urban features, yet would be contextual with the roadway corridor. The introduction of wider pavement for dedicated turn lanes and traffic signal modifications would result in a minimal loss of landscape. The change to existing visual character of the SR-94 Visual Assessment Unit (at SR-94/Jamacha Road Intersection) would be moderately low. The change to existing visual quality would be moderately low. The collective change to existing visual character and quality would be low. Viewer response would be moderately low. The low change to existing visual resources and moderately low response would result in a moderately low visual impact that is considered less-than-significant.

SR94/Steele Canyon Road Intersection

The roadway improvements proposed at the SR-94/Steele Canyon Road intersection would create an increase in urban features, yet would be contextual with the roadway corridor. The introduction of wider pavement for dedicated turn lanes and traffic signal modifications would result in a minimal loss of landscape. The change to existing visual character of the SR-94 Visual Assessment Unit (at SR-94/Steele Canyon Road Intersection) would be low. The change to existing visual quality would be low. The collective change to existing visual character and quality would be low. Viewer response would be moderately low. The low change to existing visual resources and moderately low response would result in a moderately low visual impact that is considered less-than-significant by CEQA standards.

SR-94/Lyons Valley Road Intersection

Please see **Figure 2.6-8** for Key View 7.

The roadway improvements proposed at the SR-94/Lyons Valley Road intersection would create an increase in urban features, yet would be contextual with the roadway corridor. The introduction of wider pavement for dedicated turn lanes and signal lights would result in a minimal loss of landscape. Likewise, the tree and/or brush removal along the south side of SR-94 would result in a minimal loss of landscape as only a minor portion of the existing vegetation along this corridor would be removed. The change to existing visual character of the SR-94 Visual Assessment Unit (Key View 7 – Lyons Valley Road) would be moderately-low. The change to existing visual quality would be moderately low. The collective change to existing visual character and quality would be moderately low. Viewer response would be moderate. The moderately low change to existing visual resources and a moderate response would result in a moderate visual impact that is considered less-than-significant by CEQA standards.

SR-94/Maxfield Road (north of) Widening

Please see **Figure 2.6-7** for Key View 6.

The SR-94 roadway widening north of Maxfield Road would result in a greater expanse of paving and graded slopes, resulting in the permanent loss of landscape and a more urban appearance. The change to existing visual character of the SR-94 Visual Assessment Unit (Key View 6 – Maxfield Road) at the Maxfield Road widening location would be moderate. The change to existing visual quality would be moderate. The collective change to existing visual character and quality would be moderate. Viewer response would be moderate. The moderate

change to existing visual resources and a moderate response would result in a moderate visual impact that is considered less-than-significant by CEQA standards.

Alternative 1 - Reservation Road Access

Visual simulations for each of the key views studied for Alternative 1 are presented in **Figures 2.6-4** through **2.6-6** for Key Views 1 through 3.

Visual impacts for Alternative 1 (Key Views 1-3) would result in the permanent loss of landscape and increase the built elements in the view. The proposed alternative improvements would include widened roadway paving, retaining walls, roadway guard rails, fencing, intersection signaling, and replacement overhead utility poles and distribution lines that would result in an imbalance between built and landscape elements in the view. The Proposed Project would alter the form and line of the existing highway and further urbanize the view. The Proposed Project would adjust the roadway alignment and increase the width of the pavement section to a more urban scale. The Proposed Project would alter the roadway horizontal and vertical curvature to a less sinuous form and change the character to a more urban aesthetic. In Key View #3, the realigned and widened roadway is located further within the open space, making the roadway a more prominent element in the view. The grades of the roadway as shown in Key View #1 would change to 5-6-feet higher than the existing grade along SR-94. At Key View #2, along Melody Road, the roadway would change in elevation to approximately 11-feet to 20-feet higher than the original grades, making the roadway more prominent. The additional highway features would introduce retaining walls, guard rails, fencing, and topographical changes that would create a more dissonant relationship between Proposed Project built features and the existing natural features and topography. The Project would reduce the natural hues and textures, adding monochromatic hues and tones of highway features, increasing the urban character of the view. The change to existing visual character would be high.

The Project would expand the built features within the viewshed, changing the rural character and scale to more urban scene and reducing the memorability of the view. Vividness would be reduced to moderately low. The Project would replace the existing overhead utility wood poles and wires with taller and wider weathered steel poles located at more prominent elevations than the present locations, contributing to an increase of distractions in the view. The Project would also introduce new urban roadway forms and features, including signalized intersections that would result in the overall increase of distractions in the view. Intactness would be reduced to low. The Project would introduce features that would create a dissonant relationship between the built and landscape features, reducing the overall harmony in the view. Unity would be reduced to low. The change to the existing visual quality would be high.

Alternative #1 would create a high change to the existing visual environment from Key Views 1-3. The proposed improvements would impact scenic views, as the Project is located at the edge

of the existing rural community and rural open space. The implementation of the Project would change the rural visual character of the view by introducing new built features within the viewshed. The Project introduces two lighted, signaled intersections, however would not create a new source of light or glare that would significantly impact day or nighttime views in the area.

The high change to existing visual resources and a moderately high viewer response would result in a significant visual resource impact. The avoidance, minimization and mitigation measures listed in Section 2.6.4 would reduce the impact to a less-than-significant level.

Alternative 2 – Daisy Drive Access

Preferred Alternative - Alternative 2: Daisy Drive Access; Option 1 Full Footprint

Visual simulations for each of the key views studied for Alternative 2: Option 1 are presented in **Figures 2.6-9** through **2.6-11** for Key Views 1, 2 and 4.

The Proposed Project Alternative 2: Option 1 would have the following impacts when implemented: The SR-94 roadway would be realigned and widened for two additional lanes between Daisy Road and Melody Road, creating an expanded roadway surface that would contrast with the natural scene. Retaining walls would be installed along the east side of SR-94 (approximately 400-feet in length with the height varying between 10-feet to 16-feet) that would become dominant features in the viewshed. The Project proposes an elevation change of the roadway surface from 0 to 5-feet higher than the original roadway grades, creating a dissonant relationship with the natural topography of the site. A short fill retaining wall would also be installed along the west side of SR-94 for approximately 65-feet and would not be visible to the motorists traveling the SR-94 roadway. One distinct feature different from Alternative #1 is the concrete barrier at the base of the retaining walls that creates a more dominant composition and presence of built features in the view. At Key View #2, along Melody Road, an additional left turn eastbound lane would be provided and the roadway would change in elevation, varying from approximately 10-feet to 19-feet higher than the original grades requiring a variable height retaining wall of 10’-18’ to support the widened roadway and thus creating a dissonant relationship between the proposed and existing topography. Traffic signals would be installed at the Melody Drive/SR-94 intersection and at the Daisy Drive/SR-94 intersection, introducing urban roadway features to the existing environment. The Project would replace the existing overhead utility wood poles and wires with taller and wider weathered steel poles located at more prominent elevations than the present locations, contributing to an increase of distractions in the view.

The expanded roadway surface, guard rails, safety fencing, retaining walls with concrete barriers, graded slopes and replacement overhead utility poles and wires would increase the number of built features in the view, resulting in the permanent loss of existing landscape and urbanization

of the view. The Proposed Project features become the more dominant features and create a dissonant relationship between built and landscape features in the view. The Project features would increase the apparent width of the existing roadway from a rural to a more urban scale. Vividness would be reduced to moderately low. The textures and monotone color palette would replace the natural irregular textures and earth tones of the native landscape. The replacement of the overhead utility poles and wires would contribute to an overall increase of distractions as the Project introduces disruptive vertical features to the view. Intactness would be reduced to low. Unity would be reduced to moderately low. The Proposed Project would change the rural character to a more urban setting.

Alternative 2: Option 1 would create a high change to the existing visual environment from Key Views 1-3. The proposed improvements would not greatly affect scenic views, as the access road component of the Project is located further away from the rural open space to the south than the access road component of Alternative 1, and closer to the developed portion of the existing rural community. The implementation of the Project would change the rural visual character of the view by introducing new urban roadway features within the viewshed. The Project introduces two lighted, signaled intersections, however would not create a new source of light or glare that would significantly impact day or nighttime views in the area.

The impacts presented above are considered significant visual impacts. The avoidance, minimization and mitigation measures listed in Section 2.6.4 would reduce the impact to a less-than-significant level.

Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint

Visual simulations for each of the key views studied for Alternative 2: Option 2 are presented in **Figures 2.6-12** through **2.6-13** for Key Views 1 and 2.

From Key View #1, the roadway would change in elevation, varying from approximately 9-feet to 18-feet higher than the original grades and would require a wider Project footprint at the intersection of SR-94 and Melody Road. These changes would contribute to a more dissonant relationship between the proposed features and elevations and the existing topography. Melody Road and Peaceful Valley Ranch Road would be widened to accommodate left turn lanes onto SR-94, creating a greater expanse of paving that would become a dominant feature in the view. A continuous retaining wall of varying height would be installed along the eastbound side of Melody Road to structurally support the widened roadway (approximately 400-feet in length with the height varying between 10-feet to 18-feet). Additionally, three short retaining walls would be installed along the southbound side of SR-94 (approximately 100-feet to 150-feet in length and approximately 6-feet in height) that would likely be visible from the eastbound lanes of Melody Road. The retaining wall structures would also contribute to a more dissonant relationship between the proposed elevations and existing topography. Unity would be reduced

to low. A new traffic signal installed at the SR-94/Melody Road intersection, the expanded roadway surface, guard rails and graded slopes on the northern side of Melody Road would introduce more urban roadway features to the scene. The widened roadways and new retaining walls and roadway alignment change would result in the permanent loss of the existing landscape within the existing view. The Proposed Project would result in a loss of landscape and increase the urban scale and character of the setting. The Project would replace the existing overhead utility wood poles and wires with taller and wider weathered steel poles located at more prominent elevations than the present locations, contributing to an increase of distractions in the view. Intactness would be reduced to low. The manufactured textures and monotone color palette would replace the natural irregular texture and earth tone color of the existing native grasses and trees. Vividness would be reduced to moderately low.

Alternative 2: Option 2 would create a high change to the existing visual environment from Key Views 1-2. The proposed improvements would not greatly affect scenic views, as the Project is located further away from rural open space than Alternative 1, and is closer to the existing rural community. The implementation of the Project would change the rural visual character of the view by introducing new built features within the viewshed. The Project introduces two lighted, signaled intersections, however would not create a new source of light or glare that would significantly impact day or nighttime views in the area.

The impacts presented above are considered significant visual impacts. The avoidance, minimization and mitigation measures listed in Section 2.6.4 would reduce the impact to a less-than-significant level.

<u>Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint</u>

Visual simulations for each of the key views studied for Alternative 2; Option 3 is presented in **Figures 2.6-14** through **2.6-15** for Key Views 1 and 2.

The Project proposes an elevation change of the roadway surface approximately 1 to 2-feet higher than the original grade. The retaining walls would be constructed with graded slopes that transition the topography to the roadway edge, reducing the amount of wall face exposed to the view, yet the lengths of the walls are longer than those proposed in other alternatives. Retaining walls would be installed along the northbound side of SR-94 (approximately 1,000-feet in length with the height varying between 10-feet to 20-feet). A retaining wall would be installed on the southbound side of SR-94, about 200-feet north of Melody Road, about 100-feet in length and 4-feet in height. Melody Road and Peaceful Valley Ranch Road would be widened to accommodate proposed left turn lanes onto SR-94. No walls would be proposed along the right of way at either side of Melody Road; however the roadway transitions through an existing roadway cut. The widened roadway would require cut slope retaining walls to retain the slopes. The roadway cuts would require retaining walls (varying heights) along both east and westbound

lanes of Melody Road. The proposed retaining walls would be highly visible to the motorists traveling along Melody Road.

The Project would replace the existing overhead utility wood poles and wires with taller and wider weathered steel poles located at more prominent elevations than the present locations, contributing to an increase of distractions in the view. Intactness would be reduced to low. The proposed expanded roadway surface, guard rails, safety railings, traffic signals, graded slopes and retaining walls, increase the built forms in the view and result in a permanent loss of landscape. The built elements become more dominant in the foreground and create an unbalanced view of built and natural landscape elements. Unity would be reduced to low. The Project features, including the wider pavement section, increase the urban scale and character of the setting. The manufactured textures and monotone color palette would replace the natural irregular texture and earth tones of the native landscape. Vividness would be reduced to moderately low.

Alternative 2: Option 3 would create a high change to the existing visual environment from Key Views 1-2. The proposed improvements would not greatly affect scenic views, as the Project is located further away from rural open space than Alternative 1, and close to the existing rural community. The implementation of the Project would change the rural visual character of the view by introducing new built features within the viewshed. The Project introduces two lighted, signaled intersections, however would not create a new source of light or glare that would significantly impact day or nighttime views in the area.

The impacts presented above are considered significant visual impacts. The avoidance, minimization and mitigation measures listed in Section 2.6.4 would reduce the impact to a less-than-significant level.

<u>Alternative 3 - Melody Road Access</u>

Visual simulations for each of the key views studied for Alternative 3 are presented in **Figures 2.6-16** through **2.6-18** for Key Views 1, 2, and 5.

Alternative 3 (Key Views 1, 2 and 5) would result in the following impacts: Generally, the form of the widened roadway improvements would create a stark contrast to the landscape features in the view. The expanded roadway paving, guard rails, safety railing, retaining walls with concrete barriers, and graded slopes that increase the number of built features in the view that would result in a permanent loss of landscape and unbalanced view. The scale of the wider roadway paving and retaining walls along SR-94 and Melody Road would dominate the immediate landscape and increase the urban scale and character of the setting. The proposed improvements would also cause the permanent loss of color and textural contrast in the viewshed by introducing gray, smooth built forms. These manufactured textures and monotone color

palettes would replace the natural irregular texture and earth tones of the native landscape. The Project would replace the existing overhead utility wood poles and wires with taller and wider weathered steel poles located at more prominent elevations than the present locations, contributing to an increase of distractions in the view. The introduction of urban built features (retaining walls, expansion of pavement, guard rails, signalization and replacement poles and distribution lines) and reduction in vegetation would diminish the intactness of the setting and change the character to a more urban scene. The change to existing visual character would be high.
The vividness of the rural scene would be diminished due to the access drive on the hillside. The continuity of the landscape would be interrupted with the form of the access drive and retaining wall features intruding on the landscape. The Project would create a dissonant relationship between the built and natural features in the view. Vividness and intactness would be reduced to low. Unity would be reduced to low.

Alternative 3 would create a high change to the existing visual environment from Key Views 1, 2 and 5. The proposed improvements would greatly affect scenic views, as portions of the Project are located within higher elevation areas of existing undeveloped land that retains natural character and would be visible from several areas within the viewshed. The implementation of the Project would change the rural visual character of the view by introducing new built features within the viewshed.

The Project would create a new source of substantial light or glare that would significantly impact day or nighttime views in the area. Patrons of the JIV Gaming facility would use this roadway for access, introducing traffic lights and headlight pollution at high elevations that would be seen from local and distant residential areas.

The impacts presented above are considered significant visual impacts. The avoidance, minimization and mitigation measures listed in Section 2.6.4 would reduce the impact to a less-than-significant level.

Alternative 4: No Project Alternative

The No Project Alternative would not result in any changes to the SR-94 transportation system; therefore, no change to visual resources would occur. The No Project Alternative would not result in temporary construction-related impacts to visual resources.

Construction Impacts to Visual Resources

Alternatives 1-3: Build Alternatives

Temporary visual impacts would occur during the Project construction. The project limits of construction and staging areas are clearly defined within ROW areas or temporary construction easements. Temporary construction impacts would include temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours. Construction impacts would cease following completion of the Project. Visual mitigation for the construction period would not be considered necessary due to the changing and temporary nature of these impacts. The permanent Project enhancement features would be implemented as construction is completed. The duration of construction would be approximately 18 to 24 months. A less-than-significant visual resource impact would result from construction because of the changing and temporary nature of the construction activities.

Alternative 4: No Project Alternative

The No Project Alternative would not result in any changes to the SR-94 transportation system; therefore, no change to visual resources would occur. The No Project Alternative would not result in temporary construction-related impacts to visual resources.

2.6.4 Avoidance, Minimization and/or Mitigation Measures

The following measures are required to mitigate the significant impacts of all the Build alternatives, Alternatives 1-3, to a less-than-significant level:

Retaining Walls

(1) The heights of retaining walls should be minimized to the lowest height feasible. The exposed surface of the wall should have a finish blending with the natural colors and textures of the rural valley. Retaining walls should be required to have a semi-consistent, rough, natural appearance, with an undefined top edge and vertical sides to provide an 'unfinished' edge. No vertical bands should be placed on the face of the wall surface. Supplemental highway planting should be used where possible to soften the appearance or screen the walls from neighboring developments. All structural features developed with the Project should receive architectural treatment consistent with an approved aesthetic concept plan. The Project features would complement a design theme established for the corridor during the design development phase.

(2) Wall Alignment and Profile (Terrain Contoured). The Project should use retaining walls with long radius curves and battered faces compatible with surrounding topography. Retaining walls that follow the contours of the proposed topography and maintain a

sloped elevation at the top of the wall lessen visual impacts. The proposed wall layout alignment and profile should consist of long radius curves without tangents or points of intersection. Wall faces should complement the angles, textures and features of the surrounding natural land features (soil texture and color, boulder outcroppings).

(3) Cut Section. Where ROW is available, walls should be located at mid-slope and visually compatible with the surrounding terrain. Retaining wall constructed within the highway ROW should meet Caltrans standards. When ROW is available, wall alignment should occur at mid-slope allowing sufficient horizontal space for supplemental highway planting.

(4) Top-of-Slope Retaining Wall In-fill Sections. When ROW is available, retaining walls located at top-of-slope fill sections should provide buffer areas for vegetative screening between the wall and open space areas.

(5) Color and Texture: Proposed retaining walls along SR-94 between Melody Road and Reservation Road (Key Views 1-5) should have a decorative texture and color with an aesthetic complementing the context of the rural surroundings. The color should match the hue of the native soil and/or boulder outcropping. This minimization measure should be employed with any Alternative.

Concrete Barriers

(1) Unless necessary for safety requirements, concrete barriers should not be fabricated at the base of retaining walls. Barriers should not be needed on retaining walls installed at mid-slope conditions.

Metal Beam Guard Rails with Patina

(1) Metal beam guard rails with patina should be used for any of the proposed guard rails along the SR-94 and Melody Road corridors (Key Views 1-5). The metal surface of the beam should be chemically treated to develop a 'patina' finish, a weathered look that may be a more contextual color than the standard gray metal. This minimization measure should be employed with all Access Alternatives requiring metal beam guard rails, upon approval for use.

Replacement Highway Planting (Native)

(1) Replacement highway planting with native species and local genotype should be provided with all Access Alternatives, including a vegetative cover of native shrubs and/or groundcover planting in all areas disturbed by the Proposed Project. The

replacement planting should have an aesthetic complementing the context of the local native plant material community.

Replacement Trees

(1) Along SR-94 and Melody Road corridor (Key Views #1, #2, #5). New trees (native species and local genotype) should be provided to replace any existing trees removed from within the Project area to provide screening of proposed improvements and to help reduce the scale of the widened roadway and heights of retaining walls. This minimization measure should be employed with all Project Access Alternative.

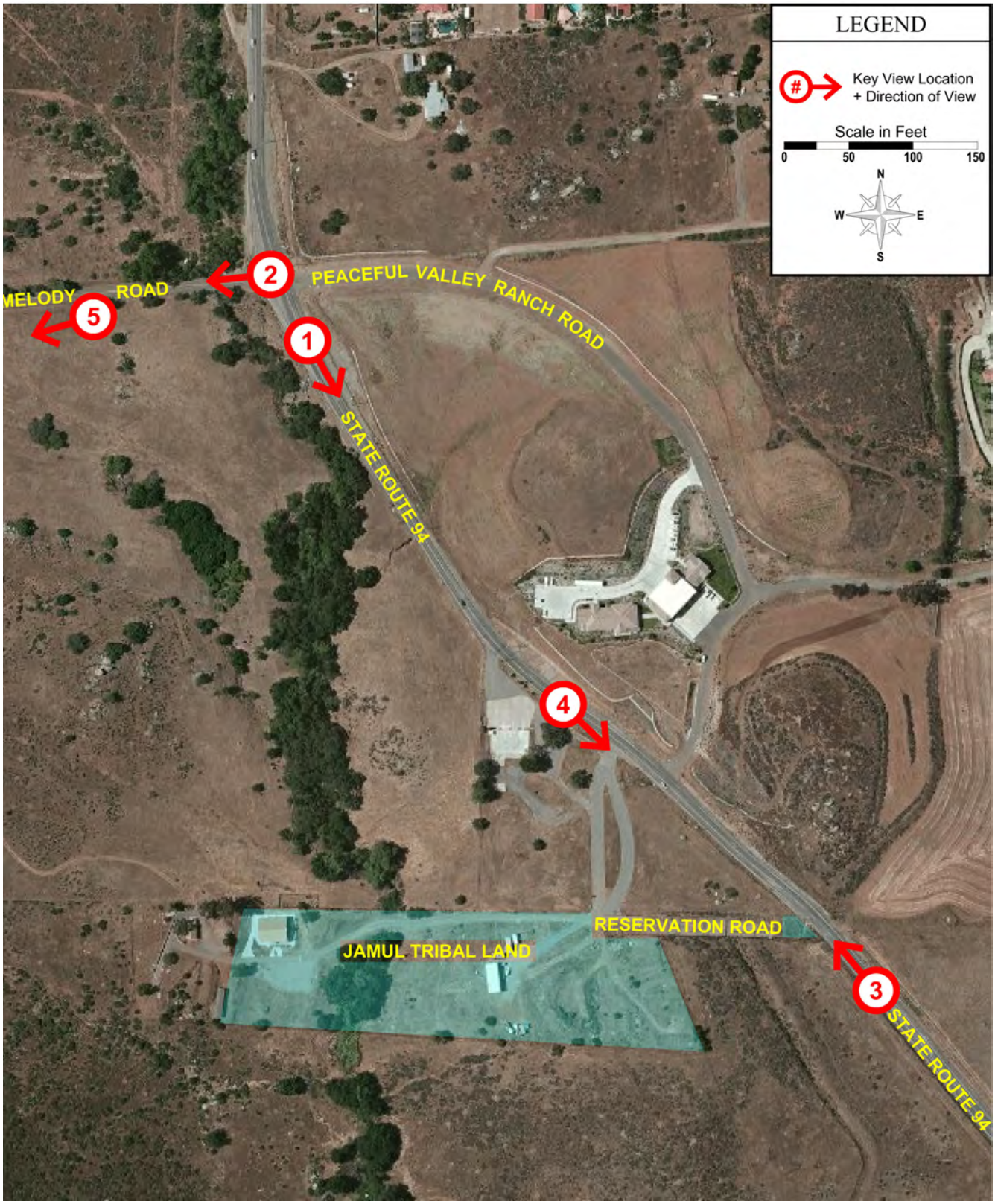


Figure 2.6-1
Key View Locations: SR-94 near Melody Road

Figure 2.6-2
Key View Location: SR-94 North of Maxfield Road

Figure 2.6-3
Key View Location: SR-94 on Lyons Valley Road

Existing View of southbound SR-94, viewing southeast, south of Melody Road - Key View 1

Alternative 1 - Key View 1 - Simulated View

Figure 2.6-4
Alternative 1: Reservation Road Access Alignment - Key View 1
Existing and Simulated View

Existing View of Melody Road, viewing west from SR-94 intersection - Key View 2

Alternative 1 -Key View 2 – Simulated View

Figure 2.6-5
Alternative 1: Reservation Road Access Alignment - Key View 2
Existing and Simulated Views

Existing View of northbound SR-94, viewing northwest - Key View 3

Alternative 1 - Key View 3 - Simulated View

Figure 2.6-6
Alternative 1: Reservation Road Access Alignment - Key View 3
Existing and Simulated Views

Existing View of northbound SR-94, viewing northwest - Key View 6

Alternative 1 - Key View 6 - Simulated View

Figure 2.6-7

Alternative 1: Reservation Road Access Alignment; Key View 6
Existing and Simulated Views

Existing View of the Lyons Valley Road intersection from west of SR-94 - Key View 7

Alternative 1 Key View 7 - Simulated View

Figure 2.6-8

Alternative 1: Reservation Road Access Alignment: Key View 7
Existing and Simulated Views

Existing View of southbound SR-94, viewing southeast, south of Melody Road - Key View 1

Alternative 2 - Key View 1 - Simulated View

Figure 2.6-9

Alternative 2: Daisy Drive Access Alignment; Option 1 Full Footprint- Key View 1

Existing and Simulated Views

Existing View of Melody Road, viewing west from SR-94 intersection - Key View 2

Alternative 2 Option 1 - Key View 2 - Simulated View

Figure 2.6-10
Alternative 2: Daisy Drive Access Alignment; Option 1 Full Footprint - Key View 2
Existing and Simulated Views

Existing View, viewing southeast from SR-94 toward Daisy Drive Access - Key View 4

Alternative 2, Option 1 - Key View 4 - Simulated View

Figure 2.6-11

Alternative 2: Daisy Drive Access Alignment; Option 1 Full Footprint - Key View 4
Existing and Simulated Views

Existing View of southbound SR-94, viewing southeast, south of Melody Road - Key View 1

Alternative 2, Option 2 - Key View 1 - Simulated View

Figure 2.6-12

Alternative 2: Daisy Drive Access Alignment; Option 2 Reduced Footprint - Key View 1
Existing and Simulated Views

-

Existing View of Melody Road, viewing west from SR-94 intersection - Key View 2

Alternative 2, Option 2 - Key View 2 - Simulated View

Figure 2.6-13
Alternative 2: Daisy Drive Access; Option 2 Reduced Footprint - Key View 2
Existing and Simulated Views

Existing View of southbound SR-94, viewing southwest, south of Melody Road - Key View 1

Alternative 3, Option 3- Key View 1 - Simulated View

Figure 2.6-14
Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint - Key View1
Existing and Simulated Views

Existing View of Melody Road, viewing west from SR-94 intersection - Key View 2

Alternative 2, Option 3 - Key View 2 - Simulated View

Figure 2.6-15
Alternative 2: Daisy Drive Access; Option 3 Minimum Footprint - Key View 2
Existing and Simulated Views

Existing View of southbound SR-94, viewing southeast, south of Melody Road - Key View 1

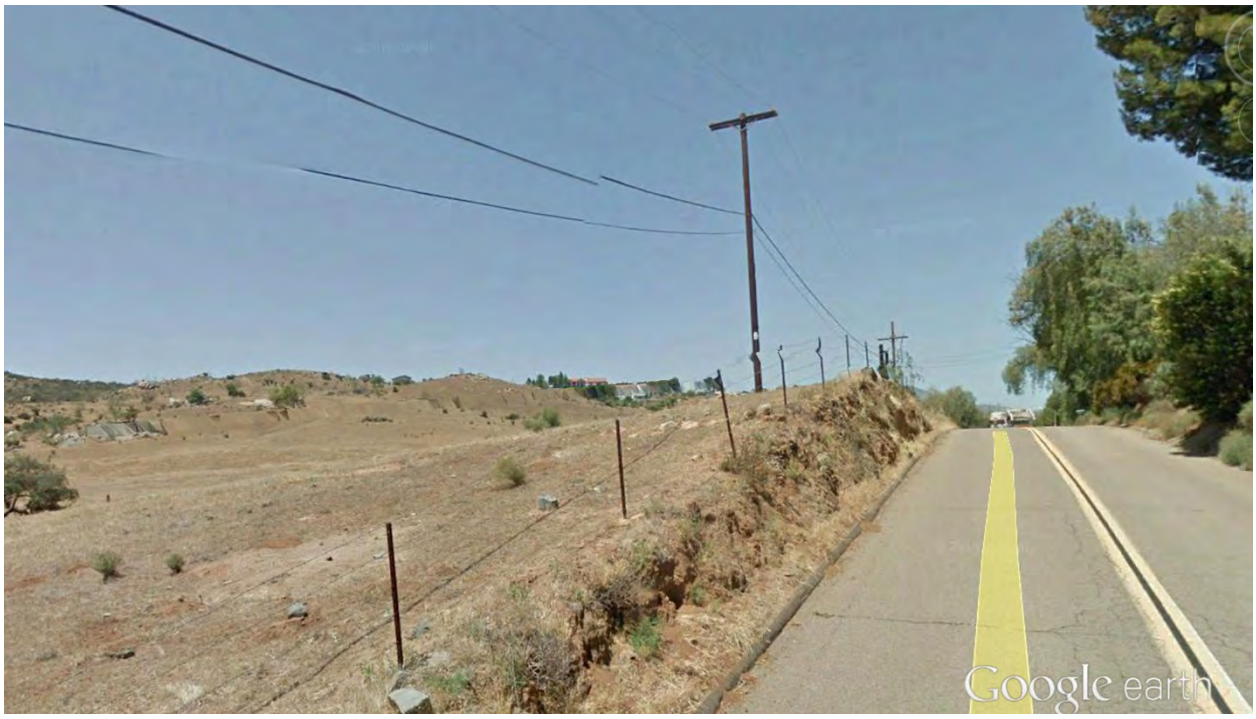
Alternative 3 - Key View 1 - Simulated View

Figure 2.6-16
Alternative 3: Melody Road Access - Key View 1
Existing and Simulated Views

Existing View of Melody Road, viewing west from SR-94 intersection - Key View 2

Alternative 3 - Simulated View- Key View 2

Figure 2.6-17
Alternative 3: Melody Road Access - Key View 2
Existing and Simulated Views



Existing View of Melody Road, viewing southwest toward the Access Road - Key View 5

Alternative 3 - Simulated View- Key View 5

Figure 2.6-18
Alternative 3: Melody Road Access - Key View 5
Existing and Simulated Views

2.7 CULTURAL RESOURCES

2.7.1 Regulatory Setting

The term "cultural resources" as used in this document refers to all "built environment" resources (structures, bridges, railroads, water conveyance systems, etc.), culturally important resources, and archaeological resources (both prehistoric and historic), regardless of significance. Laws and regulations dealing with cultural resources include the California Environmental Quality Act (CEQA) and California Public Resources Code (PRC) Section 5024.

The Archaeological Resources Protection Act (ARPA) applies when a Proposed Project may involve archaeological resources located on federal or tribal land. The ARPA requires that a permit be obtained before excavation of an archaeological resource on such land can take place.

Historical resources are considered under CEQA, as well as PRC Section 5024.1, which established the California Register of Historical Resources (CRHR). PRC Section 5024 requires state agencies to identify and protect state-owned resources that meet the National Register of Historic Places (NRHP) listing criteria. It further specifically requires Caltrans to inventory state-owned structures in its rights-of-way. Sections 5024(f) and 5024.5 require state agencies to provide notice to and consult with the State Historic Preservation Officer (SHPO) before altering, transferring, relocating, or demolishing state-owned historical resources that are listed on or are eligible for inclusion in the NRHP or are registered or eligible for registration as California Historical Landmarks (CHLs).

2.7.2 Affected Environment

Reports prepared for the Proposed Project include an Historical Resources Compliance Report (HRCR) (2014), an Archaeological Survey Report (ASR) (2014), an Extended Phase I Testing Report (XPI) (2014), an Environmentally Sensitive Area (ESA) Action Plan (2014), and a Technical Memorandum (2015). These reports are confidential and are not for public review.

The Project Area Limits (PAL) was established for the Proposed Project by Caltrans archaeological staff in consultation with the project manager and design team. Consistent with Caltrans policies and general cultural resources practices, the PAL includes the area directly impacted by construction, construction staging areas, and the ESA established to protect the entirety of CA-SDI-7966/11410/H and CA-SDI-11050. The Area of Direct Impact (ADI) covers approximately 28.4 acres of potential ground disturbance distributed within Caltrans right-of-way (ROW), paralleling narrow ROW acquisition area along SR-94, Irrevocable Offer of Dedication (IOD) land on the east side of SR-94 north and south of Melody Road, an overland route from Melody Road under Alternative 3: Melody Road Access, a construction staging area, and five SR-94 interchange improvement locations. The construction staging area would be located within the 4-acre parcel, which is north of the JIV Tribal Lands and contiguous with the

JIV Tribal Lands and SR-94. The maximum anticipated depth of vertical disturbance for Access Road Alignment or intersection improvements is 4-feet, with the exception of 11-feet for traffic signal installation and 30-feet for the footings for three Willow Creek crossings for Alternative 3: Melody Road Access.

Consultation with Native American organizations and individuals was conducted during development of the HRCR. The Native American Heritage Commission (NAHC) was contacted regarding the Proposed Project in July 2009 to request a search of their Sacred Lands File. The NAHC responded in August 2009 that their file search found Native American sacred lands or traditional cultural resources located within the PAL, and provided a list of contacts for additional consultation. Letters were sent and follow-up telephone calls were placed in June 2010 to the 14 tribes, groups, or individuals on the contact list provided by the NAHC soliciting views regarding the identification of sensitive Native American cultural resources within the vicinity of the PAL, of which several responded. None of the responses raised concerns about the Proposed Project's potential to impact Native American sacred lands or traditional cultural resources. Additionally, due to the proximity of the Proposed Project to the JIV Tribal Lands, consultation with JIV Tribal members was conducted in 2014 to gather information on the cultural significance of one site that was previously recommended as being eligible for NRHP and CRHR listing for the cultural importance to the JIV. The results of the Native American consultation are explored more fully in the HRCR and the ASR.

Records searches performed by the South Coastal Information Center at San Diego University in July 2009, September 2012, and April 2013 revealed 85 cultural studies have been completed within a 0.5-mile search radius around the PAL, including 30 studies conducted within portions of the PAL. In total, 38 cultural resources were previously recorded within 0.5 mile of the PAL, and an additional eight archaeological resources were recorded within the PAL. No built environment resources have been previously recorded within or immediately adjacent to the PAL.

Archaeological field work included survey and Extended Phase I investigations. Surveys were conducted within the PAL in June 2010, August 2011, July 2013, August 2013, February 2014, April 2014, May 2014, and October 2015. No previously unrecorded archaeological resources were identified during the field surveys, and several sites were not relocated on the surface within the PAL. Survey results indicated that two of the archaeological sites previously mapped as being within the PAL had been destroyed by previous road construction. Subsurface testing was conducted in February 2014 and April 2014. No intact cultural features or deposits were found during the subsurface testing at any of the testing locations. Site boundaries were redrawn to reflect the results of the cultural resource identification efforts, with a total of three archaeological site boundaries being remapped outside the PAL as a result of the negative findings. Of the eight archaeological resources previously identified within the PAL during the

record search, only three were located within the PAL at the end of the cultural resource identification process:

- CA-SDI-14954 (P-37-016541) is a State-owned archaeological site found to not contain intact subsurface deposits or features and to not meet NRHP or CHL eligibility criteria; and

- CA-SDI-7966/11410/H (P-37-007966/011410) and CA-SDI-11050 (P-37-011050) are archaeological sites located adjacent to the Proposed Project impacts that were determined eligible for listing in the NRHP and CRHR.

The HRCR, ASR, XPI, and ESA Action Plan were submitted to the SHPO pursuant to PRC Section 5024 on August 27, 2014 to seek concurrence on NRHP and CHL eligibility determinations for CA-SDI-14954 (P-37-016541) and identify project effects to eligible resources within State ROW. A response of concurrence from the SHPO was received September 26, 2014 for the determination of ineligibility for CA-SDI-14954 and finding of no effect on State-owned resources (see **Appendix H**).

Archaeological Resources

The following archaeological sites are considered eligible for the NRHP/CRHR and would be protected as Environmentally Sensitive Areas:

- CA-SDI-7966/11410/H (P-37-007966/011410): This 15.28-acre multi-component site contains concentrations (loci) of prehistoric and historic activity. The eight prehistoric loci contain lithics, groundstone, multiple bedrock milling features, Tizon brownware fragments, and faunal bone. The historic component includes one small locus with a sparse refuse scatter. As mapped subsequent to the XPI study, the entire site is located within the PAL but outside the area to be directly affected by the Proposed Project and would be protected by establishment of the ESA. CA-SDI-7966/11410/H was determined eligible for listing in the NRHP and CRHR under Criterion A/1 for the cultural importance of the resource to the JIV and under Criterion D/4 for the potential to yield information important to prehistory.

- CA-SDI-11050 (P-37-011050): This Late Prehistoric habitation site includes two distinct concentrations (Loci A and B) and lithic tools and debitage, projectile points, groundstone, faunal bone, and a bedrock milling feature. The core midden at the site (Locus A) has been preserved in an open space easement. As mapped subsequent to the XPI study, the entire 4-acre site is located within the PAL but outside the area to be directly affected by the Proposed Project and would be protected by establishment of the ESA. CA-SDI-11050 is considered eligible for NRHP and CRHR listing under Criterion D/4 for the potential to yield information important to prehistory.

Caltrans would avoid these sites through implementation of ESAs; therefore, these resources would not be impacted by the Proposed Project.

Built Environment Resources

There are no built environment cultural resources within the PAL. All buildings in the PAL are not eligible for inclusion in the NRHP or CRHR.

2.7.3 Environmental Consequences

Alternatives 1-3: Build Alternatives

Impacts to cultural resources would apply equally under all Build Alternatives. The impacts to historical resources are determined to assess whether the proposed undertaking would significantly impact the qualities that make each eligible for listing in the NRHP/CRHR. An historical resource would either have no impact, less than significant impact, less than significant impact with mitigation, or potentially significant impact, depending on the resource type and the nature of Proposed Project impacts to that resource. No impact to an historical resource means the Proposed Project is avoiding the resource completely.

It is Caltrans policy to avoid cultural resource impacts whenever possible. As such, impacts to CA-SDI-7966/11410/H and CA-SDI-11050 would be avoided through implementation of ESAs. With avoidance of CA-SDI-7966/11410/H and CA-SDI-11050, no impacts to known historical resources would occur as a result of Proposed Project activities.

Alternatives 4: No Project Alternative

Under the No Project Alternative, no effects would occur to cultural resources because no work is proposed.

2.7.4 Avoidance, Minimization and/or Mitigation Measures

No avoidance, minimization and/or mitigation measures are required.

The following Caltrans Standard Measures would be implemented:

(1) The two noted Environmentally Sensitive Areas (ESAs) shall be delineated on plans and layout sheets. Within the boundaries of the ESAs, as indicated on the Proposed Project plans, or where designated by the Resident Engineer, no construction or related activities that involve ground disturbance are permitted.

(2) Preconstruction Meeting: All responsible parties will ensure that ESAs are discussed during the preconstruction meeting. The importance of ESAs will be discussed with construction personnel and it will be stressed that no construction activity (including

storage or staging of equipment or materials) should occur within the ESAs and that workers must remain outside of the ESAs at all times. Additionally, personnel will be informed of historic preservation laws that protect archaeological sites against any disturbance or removal of artifacts. Any Proposed Project-related personnel that for any reason do not attend this educational meeting will be informed by the Contractor about the ESAs and said required avoidance.

(3) ESA temporary fencing will be installed by hand around the sites. The fencing will be installed at least one calendar week prior to initiating any work in those areas. The Consultant Archaeologist will coordinate this activity with the Contractor, the Environmental Construction Liaison and Resident Engineer, and be present to supervise and monitor fence installation, along with a JIV Tribal monitor. A photographic record of the newly installed ESA fence will be documented by the Consultant Archaeologist. The Consultant Archaeologist and the Environmental Construction Liaison will conduct a weekly inspection to ensure the integrity of the ESA.

(4) Contractor will notify Engineer and Consultant Archaeologist at least 5 days prior to any work adjacent to ESA.

(5) Monitoring will be conducted by an archeologist(s) under the supervision of the Consultant Archaeologist and by a JIV Tribal Monitor(s) of all earth-disturbing activities in proximity to the ESAs and of all earth-disturbing activities in native soils/sediments within the PAL. The Contractor will coordinate this activity with the Consultant Archaeologist.

(6) The archaeological monitor has the authority to halt construction within the vicinity of unanticipated cultural discoveries.

(7) Weekly monitoring summaries will be sent via email by the Consultant Archaeologist to the Resident Engineer.

(8) If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.

(9) Halt construction if significant or potentially significant cultural resources are exposed or adversely affected by construction activities outside the ESA boundaries. The Contractor and the Engineer shall halt work in the vicinity of the deposit, and the Consultant Archaeologist will follow Stipulation XV.B of the 2014 First Amended Section 106 Programmatic Agreement for Post Review Discoveries.

(10) Should human skeletal material be uncovered, Contractor's construction activities within 20 meters (66 feet) of the find shall be halted, and not resumed until permitted in writing, by Engineer.

(11) Should human skeletal material be uncovered, Consultant Archaeologist or Contractor will notify Engineer. Consultant Archaeologist will be responsible for notifying and consulting regarding treatment with the County Coroner, Native American Heritage Commission (NAHC), State Historic Preservation Officer (SHPO), Federal Highway Administration (FHWA) and Native Americans, as appropriate. If human remains are discovered, State Health and Safety Code Section 7050.5 states that all activities shall stop in all areas suspected to overlie remains, and the County Coroner shall be contacted. Pursuant to PRC Section 5097.98, if the remains are thought to be Native American, the Coroner would notify the NAHC, which would then notify the Most Likely Descendent (MLD). The person who discovered the remains would contact the Consultant Archaeologist so that they may work with the MLD on respectful treatment of the remains. Further provisions of PRC Section 5097.98 are to be followed as applicable.

(12) The Environmental Construction Liaison will inform the Consultant Archaeologist when construction is complete. The Contractor, under supervision of the Environmental Construction Liaison and/or Consultant Archaeologist, will remove temporary fencing at the conclusion of construction. The JIV Tribal monitor and Consultant Archaeologist will monitor fence removal.

2.8 HYDROLOGY AND FLOODPLAIN

2.8.1 Regulatory Setting

Executive Order (EO) 11988 (Floodplain Management) directs all federal agencies to refrain from conducting, supporting, or allowing actions in floodplains unless it is the only practicable alternative. The Federal Highway Administration (FHWA) requirements for compliance are outlined in 23 Code of Federal Regulations (CFR) 650 Subpart A.

To comply, the following must be analyzed:

- The practicability of alternatives to any longitudinal encroachments.
- Risks of the action.
- Impacts on natural and beneficial floodplain values.
- Support of incompatible floodplain development.
- Measures to minimize floodplain impacts and to preserve/restore any beneficial floodplain values affected by the Project.

The base floodplain is defined as "the area subject to flooding by the flood or tide having a one percent chance of being exceeded in any given year." An encroachment is defined as "an action within the limits of the base floodplain."

2.8.2 Affected Environment

The information provided in this section comes from the following technical studies:

- Draft Project Approval/Environmental Document (PA/ED) Drainage Report dated March 2014,
- Location Hydraulic Study (April 2014), and
- Summary Floodplain Encroachment Report (April 2014).

Hydrology

The Location Hydraulic Analysis indicates that there are two watersheds conveying runoff in existing natural channels below the roadways that contribute flows crossing the Proposed Project improvement corridor, and two man-made cross-culverts below the roadways that convey runoff across the Proposed Project improvement corridor. The two main watersheds are to the Otay River and the Sweetwater River. The Melody Road intersection has one cross-

culvert and the SR-94/Jamacha Road intersection contains the other cross culvert. The two intersections are described in more detail below.

Melody Road Intersection

The Melody Road intersection is located within a small watershed (approximately 10 square miles) in the headwaters of Jamul Creek north of the Jamul Mountains. The Melody Road intersection is located within the Jamul Hydrologic Subarea (Hydrologic Unit 10.33), which is located within the Dulzura Hydrologic Area of the larger Otay Basin. The Otay Hydrologic Unit consists of the Otay River and its major tributaries. The Otay River is the second largest river draining into San Diego Bay. Damming in the early part of the 20th century created the Otay Reservoirs, which provide drinking water for southern San Diego County. Seventy percent of the Otay River watershed is open and undeveloped; agriculture occurs in ten percent of the watershed, and urban or industrial land uses occur in the remaining twenty percent of the watershed. Large areas within the watershed are protected by state and federal wildlife refuges, and by the City of San Diego Water Department. Other major landowners include Caltrans, with jurisdiction over all freeways and highways in the watershed, local Native American tribes, and the US Navy.

The general direction of surface runoff in the Proposed Project area is to the south via Willow Creek, a drainage tributary to Jamul Creek, which is tributary to Dulzura Creek, which terminates in the Lower Otay Reservoir. The Lower Otay Reservoir is the terminus of the second San Diego Aqueduct. Surface runoff from over 160 square miles within the Otay Basin watershed flows ultimately to the south San Diego Bay and Pacific Ocean.

Willow Creek is located adjacent to the proposed access improvements at Melody Road. This existing natural channel crosses Melody Road via a 60-inch reinforced concrete pipe (RCP) culvert. Results of hydrologic modeling indicate that the existing flow within the channel during a 100-year storm event is 196 cubic feet per second (cfs). Downstream of the culvert, the channel is natural and continues to Jamul Creek.

SR-94/Jamacha Road Intersection

The SR-94/Jamacha Road intersection is located adjacent to an unnamed tributary to Sweetwater River. The channel below the roadway crosses under SR-94 via two box culverts estimated to be 16-feet wide by 6-feet high. The culvert conveys the surface water underground through the adjacent shopping center area to an existing outlet just east of the existing YMCA facility to the Sweetwater River. Results of hydrologic modeling indicate that the existing flow within the channel during a 100-year storm event is approximately 1,115 cfs.

The Sweetwater River flows to the west and flows through mostly private and public open space areas between the Proposed Project improvement corridor and the Sweetwater Reservoir, and

then ultimately to San Diego Bay. See **Figure 2.8-1** for location of the existing natural channel at the SR-94/Jamacha Road location.

Floodplains

FEMA determines the presence or absence of the 100-year and 500-year flood zones within the Proposed Project limits. The SR-94/Jamacha Road intersection is the only Proposed Project area that is near a FEMA mapped floodplain. The SR-94/Jamacha Road location is designated Zone D for areas of undetermined flood risk. The Zone D designation is applied for areas where there are possible, but undetermined, flood risks, and no flood hazard analysis has been conducted. For purposes of comparison, flood zones labeled with the letters B, C, or X represent moderate- and low-risk areas. Flood zones identified as AE are areas within the 100-year floodplain and considered to be areas at high risk of flooding. Flood zones identified with letter A, or V represent high risk areas, known as Special Flood Hazard Areas (SFHAs). Areas that are identified as Zone D are often undeveloped and sparsely populated. The FEMA floodplain mapping near this intersection is shown in **Figure 2.8-2**.

2.8.3 Environmental Consequences

Hydromodification describes an activity in which that natural ground surface is altered such that it affects the velocity and volume (also referred to as flow rate) of surface water runoff. Hydromodification is a concern whenever Proposed Projects result in increases in the percentage of impervious surfaces which could result in increased surface water runoff or flooding. Flooding can cause direct and indirect adverse impacts on the environment. Typical direct impacts resulting from flooding include the loss of life and/or property; health and safety hazards; disruption of commerce, water, power, and telecommunications services; loss of agricultural lands; and infrastructure damage.

The proposed improvements on SR-94 are similar in each Alternative. A similar number of biofiltration swales are proposed for each Alternative. A biofiltration swale is a vegetated area that removes pollutants from stormwater runoff as it flows through the vegetation. The locations of the biofiltration swales are shown on the Proposed Project Feature Maps (Figures 1-4 to 1-13). One exception is Alternative 3; the Melody Road access improvements, which includes fewer improvements on Melody Road and therefore, incrementally fewer changes in surface water runoff along Melody Road. However, with respect to the overall approach to addressing potential impacts to hydrology and increased surface water, each Alternative is similar; therefore, impacts are addressed collectively in the discussion below.

Construction Impacts to Hydrology

Short-term construction related impacts to hydrology are similar for the Non-Access Road Intersections and each access alignment. Grading, changes in impervious area, and proximity to area creeks and drainages would be similar for each.

Alternatives 1-3: Build Alternatives

Offsite improvements are required at five intersections. The channel and drainage improvements required include clearing, grading, widening of the existing roadway for expanded intersections, and other improvements to the existing cross culverts underneath SR-94. These improvements have the potential to result in impacts as a result of changes to natural drainage patterns. Temporary impacts, such as an increase of velocity or volume of downstream flow, erosion, and flooding could occur during construction as construction equipment would be operating in adjacent channels. However, construction would require an NPDES General Permit for Discharges of Storm Water Associated with Construction Activities (No. CAS000002, Order No. 2009-009-DWQ). The permit regulates storm water discharges from construction sites that result in a Disturbed Soil Area (DSA) of one acre or greater. Grading activities, including clearing, and grubbing activities, would encompass approximately 15 acres among all of the roadway improvement areas. The limits of the grading activities are shown in **Figures 1-3** through **1-12** for each of the Non-Access Road Intersections and Access Road Alignments.

Prior to construction, a SWPPP would be prepared for the selected Alternative and would be reviewed and approved by Caltrans. The SWPPP demonstrates that the Proposed Project would comply with all requirements of an NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The SWPPP would identify the BMPs required to reduce potential increases in surface water runoff or flooding to the maximum extent practicable, based on the final engineering design.

Typical BMPs to minimize potential effects of increased surface water include: avoiding construction during rain events, and erosion control measures such as silt fences, fiber rolls, storm drain inlet protection, stockpile management, desilting basins, gravel bag berm, and rip rap for energy dissipation. The BMPs are discussed in more detail in Section 2.9 Water Quality and Stormwater Runoff. The water quality measures incorporated into the construction phase of the Proposed Project are typical BMPs required to satisfy federal and state requirements for stormwater discharge. The required BMPs would also minimize potential changes to the channel hydrology because the construction BMPs include requirements to stabilize soil, minimize surface water velocity, and control the rate of surface water flow through detention or retention to prevent increased volumes of water from exceeding the capacity of the existing drainage system.

Because of the relatively small scale of intersection and Access Road Alignment improvement, the minor amounts of additional impervious surface added, and the use of construction BMPs, the potential for change in existing drainage patterns is considered less-than-significant. Therefore, Alternatives 1-3: Build Alternatives would result in less-than-significant construction related impacts to hydrology.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; therefore, no construction impact to hydrology would result.

Floodplain Impacts

Alternatives 1-3: Build Alternatives

None of the proposed improvements, including the proposed channel improvements at the intersections of SR-94/Jamacha Road and SR-94/Melody Road, are located in areas that are mapped as within the 100-year floodplain. None of the proposed improvements have been identified as having the potential to adversely affect or hinder surface water such that it would result in a significant increase in surface water elevation during a 100-year flood event.

Because the improvements at the SR-94/Jamacha Road and SR-94/Melody Road intersections include improvements within and adjacent to existing drainage channels, changes in water surface elevation were calculated for these two improvement areas. The results are shown in **Table 2.8-1**, Water Surface Elevation Changes.

TABLE 2.8-1
WATER SURFACE ELEVATION CHANGES

Channel Location	Water Surface Elevation (ft.)	
	Existing	Proposed
SR-94/Jamacha Road	355.44	355.70
SR-94/Melody Road	957.17	955.25

The water surface elevation at the SR-94/Jamacha Road intersection is anticipated to increase up to 0.26-foot (approximately 3 inches) as result of the encroachment. A 0.26-foot increase would not be considered a significant increase in water surface elevation because that level of increase would not exceed the capacity of the existing drainage area. Additionally that level of increase would not exceed the surface elevation of the SR-94/Jamacha Road intersection and would not expose people or property to flooding or flood hazards that did not previously exist. The water surface elevation at the SR-94/Melody Road intersection is anticipated to decrease as a result of the Proposed Project. The proposed improvements at Melody Road include a larger culvert

which would result in a surface elevation drop of approximately two feet, minimizing the potential for flooding upstream and downstream of the Proposed Project area. This is because the lower water surface elevation would be less likely to exceed the height of the existing channel and elevation of the SR-94/Melody Road intersection.

The proposed improvements would not result in an increase in base floodplain elevation, encroachment into a regulatory floodway, nor would it require a revision to a floodplain map. In addition, the Proposed Project would not result in a risk to life or property or an adverse impact on natural and beneficial floodplain values. The proposed improvements would not develop or alter existing floodplains and no impact would occur.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; no impacts would result.

2.8.4 Avoidance, Minimization and Mitigation Measures

None required.

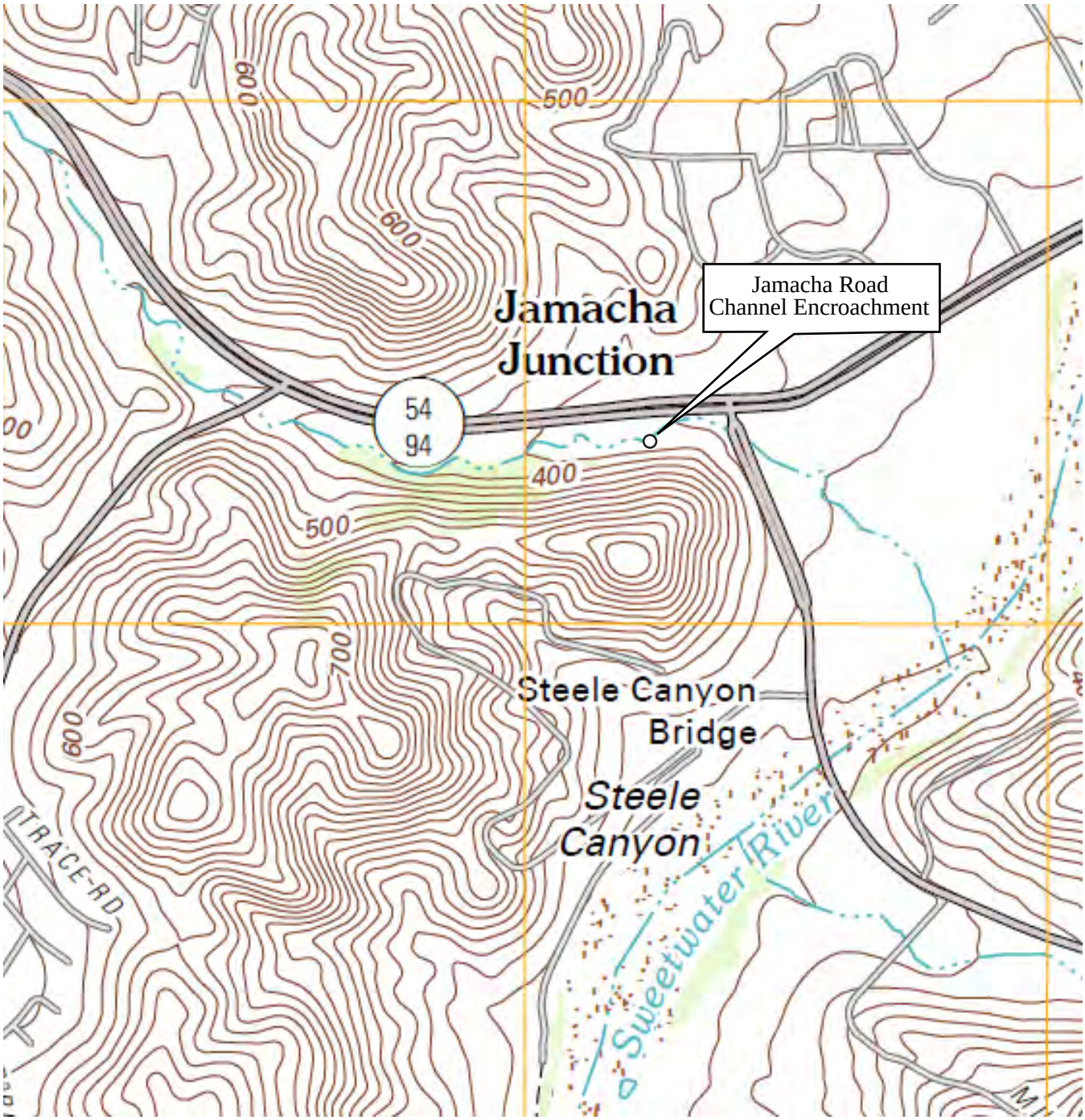


Figure 2.8-1
Existing Natural Channel at SR-94 and Jamacha Road

Figure 2.8-2
FEMA Map of Jamacha Road Channel Encroachment

2.9 WATER QUALITY AND STORM WATER RUNOFF

2.9.1 Regulatory Setting

Federal Requirements: Clean Water Act

In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the waters of the United States (U.S.) from any point source unlawful unless the discharge is in compliance with a NPDES permit. This act and its amendments are known today as the Clean Water Act (CWA). Congress has amended the act several times. In the 1987 amendments, Congress directed dischargers of storm water from municipal and industrial/construction point sources to comply with the NPDES permit scheme. The following are important CWA sections:

- Sections 303 and 304 require states to issue water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the U.S. to obtain certification from the state that the discharge will comply with other provisions of the act. This is most frequently required in tandem with a Section 404 permit request (see below).
- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the U.S. Regional Water Quality Control Boards (RWQCB) administer this permitting program in California. Section 402(p) requires permits for discharges of storm water from industrial/construction and municipal separate storm sewer systems (MS4s).
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the U.S. This permit program is administered by the USACE.

The goal of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."

The USACE issues two types of CWA Section 404 permits: General and Standard permits. There are two types of General permits: Regional permits and Nationwide permits. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Ordinarily, projects that do not meet the criteria for a Nationwide Permit may be permitted under one of the USACE's Standard permits. There are two types of Standard permits: Individual permits and Letters of Permission. For Standard permits, the USACE decision to approve is

based on compliance with U.S. Environmental Protection Agency (U.S. EPA) Section 404 (b)(1) Guidelines (U.S. EPA CFR 40 Part 230), and whether the permit approval is in the public interest. The Section 404(b)(1) Guidelines (Guidelines) were developed by the U.S. EPA in conjunction with the USACE, and allow the discharge of dredged or fill material into the aquatic system (waters of the U.S.) only if there is no practicable alternative which would have less adverse effects. The Guidelines state that USACE may not issue a permit if there is a least environmentally damaging practicable alternative (LEDPA) to the proposed discharge that would have lesser effects on waters of the U.S. and not have any other significant adverse environmental consequences. According to the Guidelines, documentation is needed that a sequence of avoidance, minimization, and compensation measures has been followed, in that order. The Guidelines also restrict permitting activities that violate water quality or toxic effluent[1] standards, jeopardize the continued existence of listed species, violate marine sanctuary protections, or cause "significant degradation" to waters of the U.S. In addition, every permit from the USACE, even if not subject to the Section 404(b)(1) Guidelines, must meet general requirements. See 33 CFR 320.4. As discussed in **Section 2.17**, Wetlands and Other Waters, the Proposed Project impacts less than 0.5 acre of waters of the US. As such, the Proposed Project would qualify for a CWA Section 404 Nationwide Permit for fill of waters of the US, and therefore, a discussion of the LEDPA determination is not required for this Proposed Project.

State Requirements: Porter-Cologne Water Quality Control Act

California's Porter-Cologne Act, enacted in 1969, provides the legal basis for water quality regulation within California. This act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state. It predates the CWA and regulates discharges to waters of the state. Waters of the State include more than just waters of the U.S., such as groundwater and surface waters not considered waters of the U.S. Additionally, it prohibits discharges of "waste" pursuant to a definition of waste that is broader than the CWA's definition of "pollutant." Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements (WDRs) and may be required even when the discharge is already permitted or exempt under the CWA.

The State Water Resources Control Board (SWRCB) and RWQCBs are responsible for establishing the water quality standards (objectives and beneficial uses) required by the CWA, and regulating discharges to ensure compliance with the water quality standards. Details about water quality standards in a project area are included in the applicable RWQCB Basin Plan. For this Proposed Project, the site is within the jurisdiction of the San Diego Regional Water Quality Control Board; Region 9. In California, Regional Boards designate beneficial uses for all water body segments, and then set criteria necessary to protect these uses. As a result, the water

[1]/ The U.S. EPA defines "effluent" as "wastewater, treated or untreated, that flows out of a treatment plant, sewer, or industrial outfall."

quality standards developed for particular water segments are based on the designated use and vary depending on that use. In addition, the SWRCB identifies waters failing to meet standards for specific pollutants. These waters are then state-listed in accordance with CWA Section 303(d). If a state determines that waters are impaired for one or more constituents and the standards cannot be met through point source or non-point source controls (NPDES permits or WDRs), the CWA requires the establishment of Total Maximum Daily Loads (TMDLs). TMDLs specify allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed.

State Water Resources Control Board and Regional Water Quality Control Boards

The SWRCB administers water rights, sets water pollution control policy, and issues water board orders on matters of statewide application, and oversees water quality functions throughout the state by approving Basin Plans, TMDLs, and NPDES permits. RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

National Pollutant Discharge Elimination System Program

Municipal Separate Storm Sewer Systems (MS4)

Section 402(p) of the CWA requires the issuance of NPDES permits for five categories of storm water discharges, including MS4s. An MS4 is defined as "any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over storm water, that is designed or used for collecting or conveying storm water." The SWRCB has identified Caltrans as an owner/operator of an MS4 under federal regulations. The MS4 permit covers all Caltrans rights-of-way, properties, facilities, and construction activities in the state. The SWRCB or the RWQCB issues NPDES permits for five years, and permit requirements remain active until a new permit has been adopted.

Caltrans' MS4 Permit (Order No. 2012-0011-DWQ) was adopted on September 19, 2012 and became effective July 1, 2013. The permit has three basic requirements:

1. Caltrans must comply with the requirements of the Construction General Permit (see below);

2. Caltrans must implement a year-round program in all parts of the State to effectively control storm water and non-storm water discharges; and

3. Caltrans' storm water discharges must meet water quality standards through implementation of permanent and temporary (construction) Best Management Practices (BMPs), to the Maximum Extent Practicable, and other measures as the SWRCB determines to be necessary to meet the water quality standards.

To comply with the permit, Caltrans developed the Statewide Storm Water Management Plan (SWMP) to address storm water pollution controls related to highway planning, design, construction, and maintenance activities throughout California. The SWMP assigns responsibilities within Caltrans for implementing storm water management procedures and practices as well as training, public education and participation, monitoring and research, program evaluation, and reporting activities. The SWMP describes the minimum procedures and practices Caltrans uses to reduce pollutants in storm water and non-storm water discharges. It outlines procedures and responsibilities for protecting water quality, including the selection and implementation of BMPs. The Proposed Project would be programmed to follow the guidelines and procedures outlined in the latest SWMP to address storm water runoff.

Construction General Permit

Construction General Permit (Order No. 2009-009-DWQ), adopted on September 2, 2009, became effective on July 1, 2010. The permit regulates storm water discharges from construction sites that result in a Disturbed Soil Area (DSA) of one acre or greater, and/or smaller sites that are part of a larger common plan of development. By law, all storm water discharges associated with construction activity where clearing, grading, and excavation result in soil disturbance of less than one acre must comply with the provisions of the Construction General Permit. Construction activity that results in soil disturbances of less than one acre is subject to this Construction General Permit if there is potential for significant water quality impairment resulting from the activity as determined by the RWQCB. Operators of regulated construction sites are required to develop storm water pollution prevention plans; to implement sediment, erosion, and pollution prevention control measures; and to obtain coverage under the Construction General Permit.

The 2009 Construction General Permit separates projects into Risk Levels 1, 2, or 3. Risk levels are determined during the planning and design phases, and are based on potential erosion and transport to receiving waters. Construction General Permit requirements apply according to the Risk Level determined. For example, a Risk Level 3 (highest risk) project would require compulsory storm water runoff pH and turbidity monitoring and aquatic biological assessments during specified seasonal windows both before and after construction. For all projects subject to the Construction General Permit, applicants are required to develop and implement an effective SWPPP. In accordance with Caltrans Standard Specifications, a Water Pollution Control Plan (WPCP) is necessary for projects with DSA less than one acre.

Section 401 Permitting

Under Section 401 of the CWA, any project requiring a federal license or permit that may result in a discharge to a water of the U.S. must obtain a 401 Certification, which certifies that the project will be in compliance with state water quality standards. The most common federal permits triggering 401 Certification are CWA Section 404 permits issued by the USACE. The 401 permit certifications are obtained from the appropriate RWQCB, dependent on the project location, and are required before the USACE issues a 404 permit.

In some cases, the RWQCB may have specific concerns with discharges associated with a project. As a result, the RWQCB may issue a set of requirements known as Waste Discharge Requirements (WDRs) under the State Water Code (Porter-Cologne Act) that define activities, such as the inclusion of specific features, effluent limitations, monitoring, and plan submittals that are to be implemented for protecting or benefiting water quality. WDRs can be issued to address both permanent and temporary discharges of a project.

2.9.2 Affected Environment

The information provided in this section comes from the following technical studies:

- Caltrans' Long Form Stormwater Data Report, completed February 14, 2014
- Project Approval/Environmental Document Drainage Report for Jamul Indian Village of California, April 2014
- Project Approval/Environmental Document Offsite Mitigation Drainage Report, May 2014

Watersheds

The upper watershed of the Jamul area contains large undeveloped areas within the Cleveland National Forest and Cuyamaca Rancho State Park. Unincorporated rural and suburban communities characterize the central part of the watershed. The urbanized lower portion of the Sweetwater watershed contains portions of several cities including San Diego, National City, Chula Vista, La Mesa, and Lemon Grove. Approximately forty-one percent (41%) of the land within the Sweetwater Watershed is administered by state and federal agencies, or is controlled by Native American tribes. The unincorporated communities of Jamul, Pine Valley, Descanso, and Alpine, the Cleveland National Forest, Cuyamaca Rancho State Park, and the Viejas Indian Reservation occupy much of the undeveloped land in the Sweetwater Watershed.

The topography of the Proposed Project area is a rolling terrain, with a general slope east to west. The climate is arid, with annual precipitation averaging about 10-inches.

The topography of the intersections from Jamacha Boulevard to Lyons Valley Road generally slopes from east to west and drains into Sweetwater River, which eventually discharges into the Sweetwater Reservoir. These intersections are located within the Jamacha Hydrologic Subarea (Hydrologic Unit 9.21), which is located in the Middle Sweetwater Hydrologic Area of the larger Sweetwater Basin.

The Sweetwater Hydrologic Unit consists of the Sweetwater River and its major tributaries. The Sweetwater River is the largest river draining into San Diego Bay. The dominant land uses in the Sweetwater River watershed are urban (29%), open space / agriculture (22%), and undeveloped (49%). Surface runoff from over 415 square miles within the Sweetwater Basin watershed flows ultimately to the south San Diego Bay and Pacific Ocean.

The Access Road Alignments and SR/94 Maxfield Road intersection improvements are located within the Jamul Hydrologic Subarea (Hydrologic Unit 910.33), which is located within the Dulzura Hydrologic Area of the larger Otay Basin. The improvement areas drain to Jamul Creek (Hydrologic Unit 910.33), which flows to the Lower Otay Reservoir (Hydrologic Unit 910.31), the Otay River (Hydrologic Unit 910.21), and ultimately flows to San Diego Bay (Hydrologic Unit 910.20).

The Otay Hydrologic Unit consists of the Otay River and its major tributaries. The Otay River is the second largest river draining into San Diego Bay. Damming in the early part of the 20th century created the Otay Reservoirs, which provide drinking water for southern San Diego County (Regional Water Quality Control Board 2007b). Seventy percent of the Otay River watershed is open and undeveloped; agriculture occurs in ten percent of the watershed, and urban or industrial land uses occur in twenty percent of the watershed (Regional Water Quality Control Board 2007b). Although the upper parts of the Otay watershed are protected from future development (e.g., within dedicated open space areas), there has been rapid growth in certain regions, including the Jamul area. Large areas within the watershed are protected by state and federal wildlife refuges, and by the City of San Diego Water Department. Other major landowners include Caltrans, with jurisdiction over all freeways and highways in the watershed, Native American Tribes, and the Federal Government.

These hydrologic units and hydrologic areas represent subdivisions of the larger Sweetwater and Otay basins as defined in the San Diego Basin Plan. The tracking and recognition of these smaller watersheds are important to water quality management because they identify the receiving water bodies to which surface water for a particular area will flow.

Water Quality

The San Diego Basin Plan identifies beneficial uses of the downstream reservoirs from the Proposed Project areas. The beneficial uses of the downstream water bodies are as follows:

1. Sweetwater Reservoir: Municipal and Domestic Supply, Agricultural Supply, Industrial Service Supply, Industrial Process Supply, Water Contact Recreation, Non-contact Water Recreation, Warm Freshwater Habitat, Cold Freshwater Habitat, Wildlife Habitat, and Spawning.

2. Otay Reservoir: Municipal and Domestic Supply, Agricultural Supply, Industrial Service Supply, Industrial Process Supply, Water Contact Recreation, Non-contact Water Recreation, Warm Freshwater Habitat, Cold Freshwater Habitat, and Wildlife Habitat.

The CWA approach to managing water quality relies on evaluating the condition of surface waters and setting limitations on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The limits of water pollutants are established by total maximum daily loads (TMDLs). A TMDL must account for all sources of the pollutants that caused the water to be listed. Federal regulations require that the TMDL, at a minimum, account for contributions from point sources (federally permitted discharges) and contributions from nonpoint sources. A list maintained by the RWQCB (known as the 303(d) list), identifies the maximum levels of pollutants allowed for receiving water bodies in California. **Table 2.9-1** 303(d) List Pollutants for Proposed Project Receiving Waters, lists receiving water bodies, and the types of pollutants for which the water body is impaired. The RWQCB has not adopted any TMDLs for these water bodies and pollutant combinations.

TABLE 2.9-1
303(d) LIST POLLUTANTS FOR PROPOSED PROJECT RECEIVING WATERS

Receiving Water Body	Pollutant Category						
	Metals	Nuisance	Nutrients	Pathogens	Salinity	Toxicity	Misc.
Jamul Creek						X	
Lower Otay Reservoir	X	X	X				X
Sweetwater Reservoir			X				
Lower Sweetwater River	X		X	X	X	X	
San Diego Bay	X	X	X	X	X	X	X

Drainage – Non-Access Road Intersections

All stormwater originating within the improvement areas from Jamacha Boulevard to Lyons Valley Road is collected with storm drain inlets and conveyed by storm drain to an unnamed tributary. This tributary is a drainage tributary to the Sweetwater River, which extends to the Sweetwater Reservoir and continues to the San Diego Bay.

Drainage – Access Road Alignments

The access alignments and the SR-94/Maxfield Road intersection improvements generally slope from east to southwest. A culvert conveys offsite runoff under Melody Road in one location just west of the SR-94 intersection. Culvert locations are shown in Proposed Project designs for each Alternative in the Project Description section (**Figures 1-4** through **1-13**).

All stormwater originating within the access alignments and SR-94/Maxfield Road Intersection Proposed Project limits drains by sheet flow along surface grades to Willow Creek or, to a minor extent, to the ditches of the SR-94 right-of-way which drains into Jamul Creek and eventually into the Lower Otay Reservoir and to San Diego Bay. The San Diego County Flood Control District currently maintains culverts along Willow Creek at the following locations:

- a private roadway about 360 feet north of Melody Road with a 12-inch corrugated metal pipe;
- Melody Road, with a 60-inch concrete pipe; and
- the JIV's onsite private road (Daisy Drive), with a 24-inch corrugated metal pipe. A tributary of Willow Creek collects runoff from the Calle Mesquite residential development north of Melody Road, and discharges runoff under Melody road via a 24-inch corrugated metal pipe approximately 800 feet east of the Melody Road/SR-94 intersection.

2.9.3 Environmental Consequences

This section discusses the potential water quality effects associated with the implementation of the Proposed Project and whether it would cause or contribute to the violation of water quality standards or water quality objectives. The analysis also evaluates the procedures and practices that would be applied to reduce those impacts.

Short-term Construction Related Water Quality Impacts

Alternatives 1-3: Build Alternatives

The Non-Access Road Intersection improvements are shown in **Figures 1-4** through **1-8** in Chapter 1 Project Description. Potential sources of temporary surface water impacts include: construction materials, contaminants in and near the existing roadway, vehicle leaks, traffic accidents, and illegal dumping. Temporary construction site storm water BMPs would be implemented to minimize or eliminate impacts to ground and surface waters.

It is estimated that the largest percentage of construction pollutants would be sediment, from grading activities, and dust generated during excavation, grading, hauling, demolition, and other

ground disturbing activities. The impacts of these activities would vary based on as construction activities. Grading activities, including clearing and grubbing, and would encompass approximately 15 acres among all of the roadway improvement areas. The limits of the grading activities are shown in **Figures 1-4** through **1-13** for each of the Non-Access Road Intersections and Access Road Alignments.

Water quality impacts due to clearing and grading activities would be minimized by containment of potential pollutants before they come in contact with offsite drainages. Under the requirements of the General Permit for Storm Water Discharge Associated with Construction Activities (Order No. 2009-0009, NPDES No. CAS000002) a SWPPP would be required. It would be prepared and submitted to Caltrans for review and approval. The SWPPP is reviewed by Caltrans water quality specialists to ensure consistency with NPDES General Permit requirements. The SWPPP is approved by Caltrans prior to the start of construction. The SWPPP would contain BMPs specifically designed to address construction water quality impacts. Coverage under the permit requires creation and implementation of an effective storm water pollution prevention plan, erosion control plan, hazardous materials management and spill response plan, and construction best management practices, all of which are designed to minimize or eliminate erosion issues and eliminate sediment discharges. Adverse effects to water quality during the construction phase would also be avoided through compliance with Caltrans Storm Water Quality Handbook and implementation of an erosion control plan. With proper implementation, these plans reduce or eliminate the potential for accidental release of sediment and other pollutants during construction, as well as reduce the potential for erosion. The erosion control plan would be prepared before construction commences, and would identify the location of erosion control features necessary to protect and filter stormwater runoff. Features used during construction may include but are not limited to silt fences, fiber rolls, and gravel bag check dams.

To specifically address erosion the SWPPP also includes the development of a Construction Site Monitoring Program that presents procedures and methods related to the monitoring and sampling and analysis plans for non-visible pollutants, sediment and turbidity, pH, and receiving waters. This Proposed Project is determined to be a Risk Level 2 based on the site's sediment risk and receiving water risk during periods of grading and site stabilization. Caltrans has reviewed the Risk Level assessment as part of the Stormwater Data Report and has concurred with the determination. The risk determination is based on factors described in the NPDES General Permit. Risk Level 2 projects are also required to prepare a Rain Event Action Plan (REAP) and sample storm water discharge. Therefore, based on the implementation of the SWPPP, the REAP and Caltrans' Storm Water Quality Handbook, Project specific water quality construction BMPs and erosion and monitoring/sampling plans would be incorporated into the Proposed Project design consistent with the requirements of the General Permit. Construction impacts on water quality are considered less-than-significant.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; therefore, no short term construction related impacts to water quality would result.

Long-term Operational Water Quality Impacts

Alternatives 1-3: Build Alternatives

Surface water pollutants originating from vehicles (e.g., tire and brake lining wear, litter, and spills during vehicle accidents) are expected to be present in surface water runoff associated with the roadway improvements. Other potential pollutant sources, anticipated from the Proposed Project in the long-term include sediment, heavy metals, organic compounds, trash and debris, and oil and grease. These pollutants already exist in the area as a result of cars on the existing roadways. Permanent impacts to water quality could occur over months or years following construction of the Proposed Project. In the areas where the BMPs are proposed, the improvements would result in improved water quality treatment compared to the existing roadway areas as water treatment mechanisms do not currently exist in these areas. The use of temporary construction and permanent operational SWPPP/BMP measures listed in Section 2.9.4 ensures that a less-than-significant impact would result.

The preliminary storm water treatment strategy is to implement Treatment Control BMP techniques to control and reduce runoff rates, promote infiltration and mimic existing natural drainage conditions. Treatment Control BMPs are measures that are incorporated into the Proposed Project design with the intent of treating storm water prior to it entering the main channel or drainage where the surface water would normally collect. Runoff from the proposed roadway improvements would drain to biofiltration swales prior to being collected by an inlet and storm drain. The biofiltration swales capture runoff from the impervious areas before discharging to the storm drain system. Runoff is allowed to infiltrate prior to reaching the storm drain system. Numerous biofiltration swales are incorporated into the Proposed Project and are shown in the Proposed Project features maps, **Figures 1-5, 1-6, 1-8**, and **1-9** through **1-13**. With the exception of the improvements at SR-94/Jamacha Boulevard and SR-94/Lyons Valley Road, the biofiltration swales would treat 100% of the equivalent net increase in impervious area (i.e., new pavement area). The improvements at the Jamacha Boulevard and Lyons Valley Road intersections do not propose an increase in impervious area, therefore no biofiltration swales are required. These design parameters including, water quality flow rate, hydraulic residence time (amount of time the surface water is within the biofiltration swale), depth, and water velocity within the biofiltration swale are included in the Long Form Storm Water Data Report (SWDR) prepared for the Proposed Project.

The improvements located at intersections between Jamacha Boulevard and Lyons Valley Road discharge into the upper reach of Sweetwater River. This segment of the river is not listed on the

303(d) list, however the Sweetwater Reservoir, Lower Sweetwater River, and San Diego Bay are listed on the 303(d) list as shown in **Table 2.9-1**. The remaining improvements located south of Lyons Valley Road discharge to Jamul Creek, Lower Otay Reservoir, Otay River, and San Diego Bay, which are listed on the 303(d) list for the specific pollutant categories shown in Table 2.9-1. The source of the pollutants varies as a result of the variety of existing land uses within the watersheds, but generally speaking the pollutant source is from surface water runoff coming from existing development.

The Proposed Project includes the implementation of BMPs listed in Section 2.9-4 below as part of the Proposed Project and as part of compliance with existing federal law as well as Caltrans requirements. As such no significant water quality impacts to any of the 303(d) impaired water bodies listed in **Table 2.9-1** are anticipated. The BMPs identified incorporate source and treatment control measures that are consistent with the Caltrans Stormwater Quality Manual for selecting BMPs based on type of roadway improvements and anticipated surface water pollutants associated with the Proposed Project. The Caltrans Stormwater Quality Manual incorporates the requirements of the SWRCB NPDES Permit, Statewide Stormwater Permit and Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 99-06-DWQ, NPDES No. CAS000003) for containment and treatment of surface water runoff.

For these reasons, the proposed roadway improvements would not cause or contribute to the violation of water quality standards or water quality objectives. The downstream beneficial uses of the water bodies are not anticipated to be affected by the Proposed Project because implementation of the BMPs described in Section 2.9.4 ensure that a less-than-significant impact would result.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; therefore, no operational impact to water quality would result.

2.9.4 Avoidance, Minimization and Mitigation Measures

No avoidance, minimization and mitigation measures are required.

The following Caltrans Standard Measures would be implemented:

(1) The construction contractor is required to follow the procedures outlined in the California Department of Transportation (Caltrans) Storm Water Quality Handbooks, Project Planning and Design Guide (July 2010 or subsequent issuance) for implementing Design Pollution Prevention and Treatment BMPs for the project. This will include coordination with the San Diego RWQCB with respect to the feasibility, maintenance, and monitoring of Treatment BMPs as set forth in Caltrans Statewide Storm Water Management Plan

(SWMP, May 2003 or subsequent issuance). The construction contractor is also required to comply with other provisions identified in the NPDES Permit, Statewide Storm Water Permit, and Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003 or subsequent issuance).

(2) Temporary Construction BMPs:

BMPs used to prevent, reduce, or treat stormwater pollution would be implemented and maintained both before and during the construction phase of the Proposed Project. The combination of the proposed construction and post-construction BMPs would reduce the expected pollutants and would not adversely impact the beneficial uses or water quality of the receiving waters downstream.

Prior to initiating any construction activities, the developer would prepare and provide a SWPPP to Caltrans for review and approval. A copy of the approved SWPPP would be kept at the construction site as a reference for regular maintenance and inspection actions. The SWPPP would detail how stormwater pollution will be prevented, reduced and/or treated to ensure that the water quality and beneficial uses of receiving waters will not be adversely impacted, including but not limited to the use of the of the following construction BMPs from the Caltrans Stormwater Quality Manual for construction site BMPs that would be implemented based on site specific conditions.

(a) Soil Stabilization Measures – Temporary soil stabilization consists of preparing the soil surface and applying one or combination thereof, of the following BMPs based on site specific conditions:

- Scheduling - This BMP involves developing a schedule that includes sequencing of construction activities with the implementation of construction site BMPs.

- Preservation of Existing Vegetation - Preservation of existing vegetation is the identification and protection of desirable vegetation that provides erosion and sediment control benefits.

- Hydraulic Mulch - Hydraulic mulch consists of applying a mixture of shredded wood fiber or a combination of other soil stabilizers with hydroseeding equipment, which temporarily protects exposed soil from erosion by raindrop impact or wind.

- Hydroseeding - Hydroseeding consists of applying a mixture of wood fiber, seed, fertilizer, and stabilizing emulsion with hydro-mulch

equipment, which temporarily protects exposed soils from erosion by water and wind.

- Soil Binders - Soil binders consist of applying and maintaining a soil stabilizer to exposed soil surfaces. Soil binders are materials applied to the soil surface to temporarily prevent water-induced erosion of exposed soils on construction sites.

- Straw Mulch - Straw mulch consists of placing a uniform layer of straw and incorporating it into the soil with a studded roller or anchoring it with a stabilizing mixture.

- Geotextiles, Plastic Covers, and Erosion Control Blankets/Mats – This BMP involves the placement of geotextiles, mats, plastic covers, or erosion control blankets to stabilize disturbed soil areas and protect soils for erosion by wind or water.

(b) Wood Mulching - Wood mulching consists of applying a mixture of shredded wood mulch, bark or compost.

(c) Sediment Control Measures - Temporary sediment control practices include those practices that intercept and slow or detain the flow of storm water to allow sediment to settle and be trapped. These practices can consist of installing temporary linear sediment barriers (such as silt fences, sandbag barriers, and straw bale barriers); providing fiber rolls, gravel bag berms, or check dams to break up slope length or flow; or constructing a temporary sediment/desilting basin on a sediment trap.

(d) Tracking Control - Tracking control consists of preventing or reducing vehicle tracking (dirt or sediments on the tires) from entering a storm drain or watercourse.

(e) Non-storm Water Management Measures - Non-stormwater management BMPs are source control BMPs that prevent pollution by limiting or reducing potential pollutants at their source before they come in contact with storm water. These practices involve day-to-day operations of the construction site and are usually under the control of the Contractor. These BMPs are also referred to as "good housekeeping practices", which involve keeping a clean, orderly construction site.

(f) Storm Water Sampling and Analysis – Stormwater sampling helps determine whether the BMPs employed on a construction site are effective in controlling

potential construction site pollutants from leaving the site and causing or contributing to an exceedance of water quality objectives in the receiving waters.

(3) Long Term Operational BMPs

(a) Site Design BMPs: Site design BMPs aim to conserve natural areas and minimize impervious cover, especially impervious areas directly connected to receiving waters, to maintain or reduce increases in peak flow velocities from the Proposed Project site. Site Design BMPs for the Proposed Project include:

- All vegetation outside of the work limits would be preserved to provide the maximum erosion and sediment control benefits practicable.
- Permanent erosion control would include native re-vegetation. Hydroseed mixes for slopes and vegetation for swales will be specified during design.
- Hard surfaces for the Proposed Project drainage design will consist of rock slope protection (RSP) at the end of pipe outlets.
- Concentrated flow conveyance systems such as ditches, dikes, swales, overside drains, and outlet protection/velocity dissipation devices are proposed for this Proposed Project to intercept and convey surface flows to minimize soil erosion. Dikes route the runoff to existing and proposed drainage inlets. Outlet protection/velocity dissipation BMPs are placed at all outlets of drainage systems that discharge into earthen areas.

(b) Treatment BMPs: Post-construction treatment control stormwater management BMPs treat stormwater emanating from the Proposed Project site. The NPDES General Permit requires the use of post-construction BMPs that will remain in service to protect water quality throughout the life of the Proposed Project. The SWDR would include the following Treatment BMPs for the Proposed Project:

- Biofiltration Swales would be incorporated throughout the Proposed Project to ensure treatment of 100% of the equivalent net increase impervious area.
- A single Checklist T-1, Part 2 would be completed for the proposed biofiltration swales.
- Each biofiltration swale would be designed to meet treatment requirements and conveyance criteria per HDM Chapter 800. The water

quality flow rate, hydraulic residence time, and depth for each bioswale would be determined for each bioswale prior to construction.

2.10 GEOLOGY/SOILS/SEISMIC/TOPOGRAPHY

2.10.1 Regulatory Setting

For geologic and topographic features, the key federal law is the Historic Sites Act of 1935, which establishes a national registry of natural landmarks and protects "outstanding examples of major geological features." Topographic and geologic features are also protected under CEQA.

This section also discusses geology, soils, and seismic concerns as they relate to public safety and Proposed Project design. Earthquakes are prime considerations in the design and retrofit of structures. Caltrans' Office of Earthquake Engineering is responsible for assessing the seismic hazard for Caltrans projects. Structures are designed using Caltrans' Seismic Design Criteria (SDC). The SDC provides the minimum seismic requirements for highway bridges designed in California. The type and size of the earth retaining system will determine its seismic performance level and which methods are used for estimating the seismic demands and structural capabilities. For more information, please see Caltrans' Division of Engineering Services, Geotechnical Services, Guidelines for the Preparation of Geotechnical Design Reports for Earth Retaining Systems.

2.10.2 Environmental Setting

A District Preliminary Geotechnical Report (DPGR) was prepared for the Proposed Project in September 2013, and is incorporated herein by reference. Preparation of the DPGR included a site reconnaissance to the Proposed Project area performed on August 26 and 27, 2013. These field visits were conducted by staff geologists from Geocon, Inc., the preparers of the report. In addition to the site reconnaissance, four small diameter borings were drilled at the following locations within the existing Caltrans right-of-way:

Boring 1: North side of Jamacha Road, east of SR-94

Boring 2: South side of SR-94 at intersection with Steele Canyon Road

Boring 3: West of SR-94 and north of Maxfield Road

Boring 4: East side of SR-94 North of Peaceful Valley Ranch Road.

The boring locations were at the approximate location of some of the proposed biofiltration swales, where water infiltration is expected to occur. Soil samples from these boring locations were examined in a laboratory to determine the soil composition. The holes left in the ground are used for water infiltration tests to evaluate the infiltration capacity of the soil.

Regional Geology

The Proposed Project study area is situated in the western portion of the Peninsular Ranges geomorphic province and lies between the coastal plain and the western foothill slopes. The dominant structural trend of the Peninsular Ranges is characterized by faults associated with the Rose Canyon and Elsinore fault zones, along with other similar northerly and northwesterly-trending fault zones in southern and Baja California that form steep "tread and riser" topography that rises to the east.

The Proposed Project alignment generally runs parallel to the Rose Canyon and Elsinore fault zones. For the purpose of determining distances to these nearby fault zones, the northwest terminus of the Proposed Project is considered the SR-94/Jamacha Road intersection, and the southeast terminus is considered the location 1,900 feet south of the SR-94/Reservation Road intersection. The northwest terminus of the Proposed Project is located approximately 13-miles east of the Rose Canyon fault zone. The southeast terminus of the Proposed Project is located approximately 31-miles southwest of the Elsinore (Julian) fault, and approximately 80 miles to the west of the San Andreas Fault. There are other faults that are located closer to the Proposed Project site, but these faults are not considered active, and are therefore less of a seismic hazard.

Site Soils

The soil descriptions below were acquired from mapping sources provided by United States Department of Agriculture (USDA), Natural Resources Conservation Service (USDA, 2014), while descriptions were provided by USDA, Soil Conservation Service (USDA, 1973).

SR-94/Jamacha Boulevard Intersection

The Placentia sandy loam (PfC) is the naturally occurring soil at the SR-94/Jamacha Boulevard intersection improvement area. This soil is gently to moderately sloping, has a 20 to 36-inch surface layer, and has an effective rooting depth of 20 to 36-inches. Available water holding capacity is 4 to 5-inches. Runoff is slow to medium, and the erosion hazard is slight to moderate.

SR-94/Jamacha Road Intersection

PfC is the naturally occurring soil at the SR-94/Jamacha Boulevard intersection improvement area. This soil is gently to moderately sloping, has a 20 to 36-inch surface layer, and has an effective rooting depth of 20 to 36-inches. Available water holding capacity is 4 to 5-inches. Runoff is slow to medium, and the erosion hazard is slight to moderate.

SR-94/Steele Canyon Road Intersection

The Ramona sandy loam (RaC) is the naturally occurring soil at the SR-94/Steele Canyon Road intersection improvement area. Permeability of RaC is moderately slow, while the available

water holding capacity is 8.5 to 10.5-inches. Runoff is slow to moderate, and the erosion hazard is slight to moderate. The rooting depth is more than 60-inches.

SR-94/Lyons Valley Road Intersection

The Cieneba very rocky coarse sandy loam (CmrG) is the naturally occurring soil at the SR-94/Lyons Valley Road intersection improvement area. This soil is steep to very steep, has rock outcrops on about 20 percent of the surface, very large granodioritic boulders on about 30 percent, and is only 5 to 15-inches deep over hard granodioritic rock. Runoff is rapid to very rapid, and the erosion hazard high to very high. The available water holding capacity is 1 to 1.5-inches.

SR-94/Maxfield Road Intersection

The RaC, Fallbrook sandy loam (FaD2), and Placentia sandy loam (PeC2) are the naturally occurring soils at the SR-94/Maxfield Road improvement area. Permeability of RaC is moderately slow, while the available water holding capacity is 8.5 to 10.5-inches. Runoff of RaC is slow to moderate, and the erosion hazard is slight to moderate. The rooting depth of RaC is more than 60-inches. The depth of FaD2 is 27 to 57-inches over deep rock, and it has 4.5 to 7.5-inches of water holding capacity. Runoff of FaD2 is medium, and the erosion hazard is moderate. The effective rooting depth of PeC2 is 9 to 17-inches, while runoff is slow to medium. Erosion hazard of PeC2 is slight to moderate.

Access Alignments

The Proposed Project area of the Access Road Alignments area is underlain by 10 soil types, but primarily the Cieneba loam (CIE2, CmrG), Escondido loam (Esc), FaD2, Friant loam (FxG), Las Posas loam (LpC2, LpE2), RaC2, and Wyman loam (WmC). The soils are well drained to somewhat excessively drained and have a low to moderately low water-holding capacity and slow to moderately rapid permeability. Runoff is slow to very rapid. Soil depth to bedrock varies with topography (0 to over 70-inches).

Subsurface Conditions

According to the preliminary geotechnical investigation and previous geotechnical investigations, the site is expected to be underlain by fill, topsoil, alluvium or granitic rock with varying degrees of weathering. The boring samples were taken to depths of approximately 4 feet below the ground. No groundwater was encountered at any of the boring test sites.

2.10.3 Environmental Consequences

Seismic Hazards

Alternatives 1-3: Build Alternatives

Some of the proposed intersection improvements and Access Road Alignment improvements would be built into the sloped areas adjacent to the existing roadway and supported with retaining walls to avoid drainages in the Proposed Project area. This is especially true of the work under all Access Road Alignments from Melody Road southward. In addition, grading of existing slopes and use of retaining walls would also be needed at the SR-94/Maxfield, SR-94/Steele Canyon and SR-94/Jamacha Road intersections. The proposed retaining walls would be Type 1 (concrete cantilever) or soil nail (ground anchor) walls built to the specifications required by Caltrans. Guidelines require retaining walls to be designed and constructed to withstand the site specific soil and seismic conditions in which they are built.

According to the DPGR prepared for the Proposed Project (September 2013), the Proposed Project site could be subject to severe ground shaking in the event of an earthquake along faults in the southern California/northern Baja California region. Based on the currently available Proposed Project documents, the site is underlain by granitic rock and relatively shallow alluvium and colluvium. The Proposed Project is not within deep sedimentary basins.

Liquefaction is a phenomenon in which loose, saturated, and relatively cohesion-less soil deposits beneath the groundwater table lose strength during strong ground shaking motions. Primary factors controlling liquefaction include intensity and duration of ground accelerations, characteristics of the subsurface soil, in situ stress conditions, and depth to groundwater. There may be a potential for liquefaction in areas with loose sandy soils combined with a shallow groundwater table (typically within alluvial river valleys/basins and floodplains). None of the Proposed Project areas are located within alluvial river valleys, basins, or floodplains.

The potential for liquefaction at the proposed improvement areas is considered low due to the presence of relatively shallow dense materials such as silty sand and granitic rock; and the lack of near-surface groundwater encountered during boring tests (down to four feet) as part of the District Preliminary Geotechnical Report.

Aside from liquefaction, seismic events within the Proposed Project limits could cause severe ground shaking and acceleration forces that could cause slope failure. The existing SR-94 corridor was graded through cut and fill operations. Based on field observations provided in the District Preliminary Geotechnical Report, the existing side slopes with varying inclination and height generally appear to be in good condition along the entire alignment and no debris/rock fences, debris/rock barriers or debris/rock walls were observed along the alignment. Effective design measures to minimize seismic shaking include constructing earth fills to partially absorb

underlying ground movements; isolating foundations from the underlying ground movements; and designing strong, ductile (malleable) foundations that can accommodate some deformation without compromising the functionality of the structure. Therefore, potential impacts from ground shaking and acceleration are considered less-than-significant.

Problematic soils, such as those that are expansive, can damage buried utilities and increase maintenance requirements. Expansive soils are characterized by their ability to undergo significant volume change (i.e., to shrink and swell) as a result of variation in moisture content. Changes in soil moisture can result from rainfall, landscape irrigation, utility leakage, roof drainage, and/or perched groundwater.[1] Expansive soils are typically very fine-grained and have a high to very high percentage of clay. Expansion and contraction of expansive soils in response to changes in moisture content can lead to differential and cyclical movements that can cause damage and/or distress to structures and equipment. Soil sample logs for the four geotechnical boring locations indicate that soil samples taken to a depth of approximately 4 feet identified silty sandy soils and granitic rock and that the underlying soils do not contain high percentage clay soils. No groundwater was encountered at any of the four boring test sites. The potential for expansive soils is considered low and would be a less-than-significant-impact.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impact related to seismic hazards would result.

Topography and Erosion

Alternatives 1-3: Build Alternatives

Construction under each alternative would entail grading activities, including clearing and grubbing, that would encompass approximately 15-acres total among all of the roadway improvement areas. The limits of the grading activities are shown in **Figures 1-4** through **1-13** for each of the Non-Access Road Intersections and Access Road Alignments. Due to the steep slopes and drainages within the Proposed Project area (e.g., Alternative 3 features south of Melody Road), cutting and filling of certain topographic features would be necessary. The use of retaining walls minimizes the amount of grading that is required. Therefore, more of the natural topography, including hillsides, drainages, and rock outcroppings are left in their existing condition.

While some cut slopes would be noticeable after construction is complete, the major topographical features of the Proposed Project area such as hilltops, drainages, and steep slope

[1]/ Perched groundwater is a local saturated zone above the water table that typically exists above an impervious layer (such as clay) of limited extent.

areas (i.e., those areas greater than 25% in slope and 50 feet in height) would be preserved. Thus, implementation of the Proposed Project is considered to have a less-than-significant effect on topography from Alternatives 1-3: Build Alternatives.

No exposed debris/rock fences, debris/rock barriers or debris/rock walls were observed on the existing alignment that would indicate significant erosion has occurred. Erosion can also occur as a result of stream flows that carry away soil and other sediments which result in stream bank failure which could result in damage to existing and proposed roadway improvements. Natural channels are located adjacent to the proposed improvements at SR-94/Jamacha Road and SR-94/Melody Road intersections. Field observations completed in August 2013 in conjunction with the preparation of the District Preliminary Geotechnical Report (September 2013) show that the existing drainage channels flow at natural inclines (slope) and that increased water velocity resulting in eroded channel banks was not observed.

Erosion from construction activities would be minimized and controlled through the implementation of BMPs discussed in **Section 2.9 (Water Quality)**. As noted in **Section 2.9**, the Proposed Project would not alter or divert the flow or course of any existing streams or drainages that would result in increased erosion. Proposed improvements to existing culverts would not change the course of water flowing through the Proposed Project areas. The proposed improvements would be designed to ensure that the flow rate and velocity are not substantially increased over existing conditions. Please see **Section 2.8** Hydrology and Floodplain for a discussion of hydrology for the Proposed Project.

Based on these field observations and the incorporation of BMPs listed in **Section 2.9.4**, the Proposed Project would neither incur nor create a significant impact with respect to erosion along the proposed roadway improvements. Therefore, potential impacts from erosion are less-than-significant.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impact to topography and erosion would result.

2.10.4 Avoidance, Minimization and/or Mitigation Measures

No avoidance, minimization and/or mitigation measures are required.

The following Caltrans Standard Measures would be implemented:

Seismic Hazards

Prior to construction, the Geotechnical Engineer of Record would prepare a GDR for review and approval by Caltrans Geotechnical specialists. The GDR should include a

plan to address potential ground movement and failure. The plan would provide specific provisions to avoid or minimize damage from ground movement, and the specific performance standards, based on the prevailing design standard (e.g., Highway Design Manual, California Building Code, etc.) that must be met for work to continue in that area. The Plan would include a program requiring periodic surveying for ground movement, where the Geotechnical Engineer's representative determines that potential for ground movement and failure may exist. The GDR shall incorporate the following recommendations from the Preliminary Geotechnical Report to ensure seismic stability of the Proposed Project:

- All construction of retaining walls would adhere to the requirements of the Caltrans Guidelines for the Preparation of Geotechnical Design Reports for Earth Retaining Systems regarding the design of the retailing wall including the materials used, maximum height, and construction method.

- Stabilize areas before fill placement or paving. Stabilization methods may include complete excavation and replacement, and/or installation of a fabric or geo-grid for additional stabilization. The depth and extent of required soil removal and remedial repair would be reviewed and approved in the field by an on-site geotechnical engineer based on the final Geotechnical Report prepared for the final engineering design.

- Determine the presence of groundwater using site-specific subsurface investigations at locations determined by the Proposed Project Geotechnical Engineer of Record. The effects of groundwater would be incorporated into temporary slope design on a case-by-case basis.

2.11 HAZARDOUS WASTE/MATERIALS

2.11.1 Regulatory Setting

Hazardous materials, including hazardous substances and wastes, are regulated by many state and federal laws. Statutes govern the generation, treatment, storage and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health and land use.

The primary federal laws regulating hazardous wastes/materials are the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and the Resource Conservation and Recovery Act of 1976 (RCRA). The purpose of CERCLA, often referred to as "Superfund," is to identify and clean up abandoned contaminated sites so that public health and welfare are not compromised. The RCRA provides for "cradle to grave" regulation of hazardous waste generated by operating entities. Other federal laws include:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety and Health Act (OSHA)
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, EO 12088, Federal Compliance with Pollution Control Standards, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

California regulates hazardous materials, waste, and substances under the authority of the California Health and Safety Code and is also authorized by the federal government to implement RCRA in the state. California law also addresses specific handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning of hazardous waste. The Porter-Cologne Water Quality Control Act also restricts disposal of wastes and requires clean-up of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and clean-up of contamination include Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, Title 23 Waters, and Title 27 Environmental Protection.

Worker and public health and safety are key issues when addressing hazardous materials that may affect human health and the environment. Proper management and disposal of hazardous material is vital if it is found, disturbed, or generated during Proposed Project construction.

2.11.2 Affected Environment

Environmental Site Assessments

The following assessments were prepared for the SR-94 Improvement Project and are hereby incorporated by reference:

- Phase 1 Environmental Site Assessment (ESA) for the Access Alternatives Project limits (June 2014);
- Phase 1 ESA for the State Route 94/Jamacha Boulevard Intersection Project limits (June 2014);
- Phase 1 ESA for the State Route 94/Jamacha Road Intersection Project limits (June 2014);
- Phase 1 ESA for the State Route 94/Steele Canyon Road Intersection Project limits (June 2014);
- Phase 1 ESA for the State Route 94/Lyons Valley Road Intersection Project limits (June 2014); and
- Phase 1 ESA for the State Route 94/Maxfield Road Intersection Project limits (June 2014).

The Phase I ESAs were completed in accordance with American Society for Testing and Materials (ASTM) guidelines in order to identify any potential sources of hazardous materials, waste, and substances in, and adjacent to, the Proposed Project limits. The work performed for the Phase 1 ESAs included the following:

- Electronic regulatory record search to identify possible land uses or environmental conditions that may be of concern.
- Interviews and field inspection of the parcels in and adjacent to the Proposed Project limits to look for and document land use, disturbance, materials, or facilities that may indicate past or current releases or activities that may release or use hazardous materials.
- Review of title records, historical aerial photography, historic maps (e.g., topographic maps and fire insurance maps) and municipal and county case files, where available, to identify facilities or sites that may potentially contain toxic substances.

Phase 1 ESAs do not assess lead contamination or treated wood waste; thus, these topics are addressed separately below.

SR-94/Jamacha Boulevard Intersection Proposed Project Limits

The SR-94/Jamacha Boulevard intersection is located in a rural area with no known industrial history and no known historical usage of hazardous materials or petroleum products. There are no historical or current recognized environmental conditions in connection with the SR-94/Jamacha Boulevard intersection. Records review, database searches, site reconnaissance, and interviews failed to identify any environmental conditions in connection with this intersection.

SR-94/Jamacha Road Intersection Proposed Project Limits

The SR-94/Jamacha Road intersection is located in a suburban area with no known industrial history and no known historical uses of hazardous materials or petroleum products. Some surrounding parcels are currently used for light industrial purposes, including automotive fueling and servicing stations; however, the Phase I ESA performed for this intersection improvement area detected no evidence of environmental contamination from these adjacent land uses. No recognized or historical recognized environmental conditions were found in connection with the SR-94/Jamacha Road intersection. Records review, database searches, site reconnaissance, and interviews failed to identify any current environmental conditions in connection with this intersection.

SR-94/Steele Canyon Road Intersection Proposed Project Limits

The SR-94/Steele Canyon Road intersection is located in a suburban area with some historical usage of hazardous materials and petroleum products. Properties within the intersection improvements Proposed Project limits have been used for light commercial uses, including automotive servicing and automobile fueling and dry cleaning. The Phase I ESA performed for this intersection improvement Proposed Project limits detected one case of environmental contamination: the 7-Eleven Store #21802 at 12981 Campo Road, which is currently operating two underground storage tanks (USTs) for automobile fueling. During removal of previously-used USTs, which apparently leaked, contamination from diesel, gasoline, and gasoline additives in both soil and groundwater was discovered. Groundwater under this intersection therefore is currently contaminated from these historical 7-Eleven Store petroleum product releases; contaminants consist primarily of diesel, gasoline, and gasoline additives (TBA, MTBE, and benzene). Records review, database searches, site reconnaissance, and interviews failed to identify any other current environmental conditions in connection with this intersection.

Soil under the intersection improvement Proposed Project limits may or may not be contaminated from the petroleum product releases from the 7-Eleven Store. Site investigation and site remediation are already occurring under supervision of the Regional Water Quality

Control Board. For the purposes of this proposed intersection improvement Proposed Project, it has been conservatively assumed that contamination still exists at this location and that remedial activities would not be finished before the proposed intersection improvement Proposed Project is constructed.

SR-94/Lyons Valley Road Intersection Proposed Project Limits

The SR-94/Lyons Valley Road intersection is located in a suburban area with no known industrial history and no known historical uses of hazardous materials or petroleum products. There are no current recognized environmental conditions, in connection with the SR-94/Lyons Valley Road intersection. Records review, database searches, site reconnaissance, and interviews failed to identify any current environmental conditions in connection with this intersection.

SR-94/Maxfield Road Intersection Proposed Project Limits

The SR-94/Maxfield Road intersection is located in a suburban area with no known industrial history and no known historical uses of hazardous materials or petroleum products. There are no historical or current recognized environmental conditions in connection with the SR-94/Maxfield Road intersection. Records review, database searches, site reconnaissance, and interviews failed to identify any environmental conditions in connection with this intersection.

Access Alignment Proposed Project Limits

The Access Road Alignment study area is located in a rural area and has historical development of rangeland, roadways, residences, tribal administrative buildings, an orchard, and a fire station. The only known historical uses of hazardous materials or petroleum products are associated with the fueling stations at the old fire station (14145 SR-94, Jamul) and the new fire station (14024 Peaceful Valley Ranch Road, Jamul), which are permitted facilities with regular inspections by the County and have no known history of leaks or contamination.

There are no historical or current recognized environmental conditions in connection with the proposed Access Road Alignment limits. The records review, database searches, site reconnaissance, and interviews failed to identify any environmental conditions within the Proposed Project limits.

Lead Contamination Potential

Leaded gasoline was used as a vehicle fuel in the U.S.A. from the 1920s through the 1980s. Although lead is no longer used in gasoline formulations, historical lead emissions from automobiles are a recognized source of contamination in soils along heavily-used roadways. Thus, surface and near-surface soils along such roadways have the potential to contain elevated

concentrations of aerially deposited lead (ADL). Ongoing testing by Caltrans throughout California has indicated that ADL exists along major freeway routes. At sites where soil has not been disturbed, the ADL is generally limited to the upper 2 feet of soil within unpaved shoulder and median areas.

Implementation of the Proposed Project may require the excavation and export of soils from the Proposed Project limits. Soil within, and adjacent to, the Caltrans rights-of-way may contain ADL; however, it is not yet known whether lead is present, and if so, if the level of lead within the Proposed Project limits is at a hazardous level. In accordance with Caltrans' standard requirements, prior to construction, ADL levels would be determined in order to handle the soil appropriately.

Lead may also be present within the Proposed Project limits on lead-containing surfaces (LCSs), such as metal guard rails, piping, bridge components, and roadway striping. Current Caltrans paint specifications require paints to have lead concentrations less than 20 mg/kg. Old non-yellow paints (e.g., white, blue, black, etc.) had higher concentrations of lead, but not high enough for removed paint to be classified as a hazardous waste. Therefore, residue from the removal of these paints is considered to be a nonhazardous waste. Yellow traffic paint used prior to 1999 contained high concentrations of lead. In addition, application of yellow thermoplastic material containing high concentrations of lead occurred in the Caltrans rights-of-way until that practice was phased out from 2004 to 2006. The lead concentrations in these paints and thermoplastics are high enough to make these materials hazardous wastes when they are removed.

Treated Wood Waste

Treated wood waste (TWW) may be generated when posts along metal beam guard railing, three beam barrier, piles, or roadside signs are removed. These wood products are typically treated with preserving chemicals that protect against insect attack and fungal decay. These chemicals include, but are not limited to, arsenic, chromium, copper, creosote, and pentachlorophenol. These chemicals may exist within the Proposed Project limits in concentrations that are hazardous to health.

2.11.3 Environmental Consequences

Buried Hazards and Exposure to Hazardous Materials

Non-Access Road Intersections

No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found during environmental site assessments recently performed for the Non-Access Intersections except at SR-94/Steele Canyon Road. There is one current

recognized environmental condition in connection with the SR-94/Steele Canyon Road Proposed Project limits: the 7-Eleven Store #21802 at 12981 Campo Road. During removal of previously-used USTs, which apparently leaked, contamination from diesel, gasoline, and gasoline additives in both soil and groundwater was discovered outside of the Proposed Project limits but adjacent to the Proposed Project limits. The plume of contaminated groundwater from this parcel apparently spread to other parcels. Groundwater under the Proposed Project limits is currently contaminated from these historical 7-Eleven Store petroleum product releases. Contaminants include diesel, gasoline, and gasoline additives (tert-butyl alcohol, methyl tert-butylether, and benzene). Soil under the Proposed Project limits may or may not be contaminated from these petroleum product releases from the adjacent property. Construction activities could pose a risk to human health of construction personnel if contaminants are encountered. Hazards include ignition of flammable liquids or vapors, inhalation of toxic vapors in confined spaces such as trenches, skin contact with contaminated soil or water, or the excavation of undocumented obstructions such as USTs, piping, or solid waste. This is a potentially significant impact, but avoidance, minimization and/or mitigation measures have been identified in Section 2.11-4 to reduce this impact to a less than-significant-level.

Aerially-deposited lead or lead-containing surfaces may or may not be present within the Proposed Project limits. Soil disturbance or export could result in lead environmental contamination or exposure to sensitive receptors. In addition, implementation of the Proposed Project may require the removal of lead-containing materials such as traffic stripe paint which could result in lead environmental contamination or exposure to sensitive receptors. This is a potentially significant impact, but avoidance, minimization and/or mitigation measures have been identified in Section 2.11-4 to reduce this impact to a less-than-significant level.

Treated wood waste may or may not be present within the Non-Access Road Proposed Project Limits, and improper handling and disposal of this waste could result in environmental contamination or exposure to sensitive receptors. This is a potentially significant impact, but avoidance, minimization and/or mitigation measures have been identified in Section 2.11-4 to reduce this impact to a less-than-significant level.

<u>Alternatives 1-3: Build Alternatives</u>

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

No evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions were found during environmental site assessments recently performed within the proposed Access Road Alignment limits. No significant impacts from buried tanks or hazardous waste contamination are expected from implementation of the proposed Access Road Alignments.

Aerially-deposited lead or lead containing-surfaces may or may not be present within the Proposed Project limits. Soil disturbance or export could result in lead environmental contamination or exposure to sensitive receptors. In addition, implementation of the Proposed Project may require the removal of lead-containing materials such as traffic stripe paint which could result in lead environmental contamination or exposure to sensitive receptors. This is a potentially significant impact, but avoidance, minimization and/or mitigation measures have been identified in Section 2.11-4 to reduce this impact to a less-than-significant level.

Treated wood waste may or may not be present within the Non-Access Road limits, and improper handling and disposal of this waste could result in environmental contamination or exposure to sensitive receptors. This is a potentially significant impact, but avoidance, minimization and/or mitigation measures have been identified in Section 2.11-4 to reduce this impact to a less than-significant-level.

Alternative 4: No Project Alternative

No grading or excavation of soils within the Proposed Project limits would occur under Alternative 4: No Project Alternative; therefore, hazardous materials would not be encountered. No hazardous materials impacts would result from this alternative.

2.11.4 Avoidance, Minimization and/or Mitigation Measures

Buried Hazards and Exposure to Hazardous Materials

The following measures would reduce the risk of encountering contaminated soil, contaminated groundwater, or a buried hazardous material container for Alternatives 1-3: Build Alternatives to a less-than-significant level:

(1) If contaminated soil or groundwater, or a buried hazardous material storage container, is encountered during Proposed Project construction, work would be halted in that area, and the type and extent of the contamination should be identified and characterized by qualified professionals. A qualified professional, in consultation with regulatory agencies, would then develop an appropriate method to remediate the contamination. As deemed necessary by the regulatory agency, a remediation plan would be implemented in conjunction with continued Proposed Project construction.

(2) As deemed necessary by the regulatory agency, an Environmental Contaminant Health and Safety Plan (HASP) would also be created and implemented before construction resumes. The HASP would be prepared for the construction process by a qualified professional, consistent with general industry standards and the Occupational Safety and Health Administration, and would address any risks to construction personnel and public safety. This site-specific HASP would describe in detail the health and safety guidelines,

procedures, and work practices that must be adhered to and the work to be performed, and would also include special details governing certain work, such as working in confined spaces. Should contaminants be found, appropriate measures would be taken to mitigate potential effects. This may include excavation of contaminated soils and disposal at an appropriate facility. The HASP would also address appropriate personal protective equipment (PPE), monitoring to protect on-site workers (if contamination or storage tanks are encountered), and the appropriate level of worker training (e.g., Hazardous Waste Operations and Emergency Response training). Monitoring may - include visual and olfactory observation (e.g., soil staining or unusual odors), or air monitoring with hand-held devices (e.g., photo-ionization detector) to detect volatile hydrocarbons. In addition, health-risk based action levels would be identified for applicable contaminants that would trigger modifications to work practices. Work practice modifications may include the cessation of construction activities until soil or groundwater sampling is performed, or an increase in the level of PPE or worker training. A Sampling and Analysis Plan would accompany the HASP to determine if constituents of concern are present and at what concentrations. The HASP would also address procedures to follow if unknown objects (e.g., USTs and associated piping) are encountered, and the use of specialized contractors to decommission and remove such USTs and perform confirmation sampling.

(3) No soil would be disturbed or exported from within the PSA before an ADL study is completed and a lead compliance plan is implemented. No paint striping would be removed before a lead compliance plan is implemented. The potential presence of elevated lead concentrations requires sampling and analytical testing of any exported soil and any traffic paint materials to determine appropriate health and safety procedures and proper management and disposal practices. A Project-specific Lead Compliance Plan would be required and must be prepared by a Certified Industrial Hygienist and properly implemented by the contractor. The requirements for the lead compliance plan can be found in the Caltrans Standard Specifications in Section 7-1.02K(6)(j)(ii) and CCR Title 8, Section 1532.1. Note that just one lead compliance plan that addresses all types of lead exposures on the Proposed Project is to be prepared. As specified in this plan, lead-containing materials must be sampled and analyzed prior to disposal. If the analytical results show that lead levels are below the regulated hazardous level the materials may be disposed with other construction and demolition debris. If the analytical results show that lead levels are above the regulated hazardous level, the waste must be transported under manifest to a Class I landfill appropriately permitted to receive the material. The Project-specific Lead Compliance Plan is intended, among other things, to minimize worker exposure to lead. The plan would include protocols for environmental and personnel monitoring, requirements for the use of personal protective equipment, and other health and safety protocols and procedures for the handling of lead-containing materials. The

plan would also include a dust control plan and health and safety plan to minimize worker exposure to lead and any other hazardous materials.

(4) The DTSC requires that TWW either be disposed of as a hazardous waste if test results classify it as such, or if not tested, the generator may presume that TWW is a hazardous waste (to avoid the time and expense involved in completing laboratory testing) and manage the waste by Alternative Management Standards (AMS). The AMS are described in the California Code of Regulations, Title 22, Division 4.5, Chapter 34. The AMS lessen storage requirements, extend accumulation periods, allow shipments of presumed hazardous waste TWW without manifests and registered hazardous waste haulers, and permit disposal at specific non-hazardous waste landfills. Note that treated wood that is disturbed but is not considered a waste, must not be recycled or salvaged off of the Proposed Project site.

2.12 AIR QUALITY

2.12.1 Regulatory Setting

The Federal Clean Air Act (FCAA), as amended, is the primary federal law that governs air quality while the California Clean Air Act is its companion state law. These laws, and related regulations by the USEPA and the California Air Resources Board (ARB), set standards for the concentration of pollutants in the air. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). NAAQS and state ambient air quality standards have been established for six transportation-related criteria pollutants that have been linked to potential health concerns: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), which is broken down for regulatory purposes into particles of 10 micrometers or smaller (PM_{10}) and particles of 2.5 micrometers and smaller ($PM_{2.5}$), and sulfur dioxide (SO_2). In addition, national and state standards exist for lead (Pb), and state standards exist for visibility reducing particles, sulfates, hydrogen sulfide (H_2S), and vinyl chloride. The NAAQS and state standards are set at levels that protect public health with a margin of safety, and are subject to periodic review and revision. Both state and federal regulatory schemes also cover toxic air contaminants (air toxics); some criteria pollutants are also air toxics or may include certain air toxics in their general definition.

Conformity

Caltrans assesses air quality impacts based on concepts of the Federal Clean Air Act Section 176(c), which requires projects conform to State Implementation Plan (SIP). Transportation conformity applies to highway and transit projects and takes place on two levels: the regional—or, planning and programming level—and the project level. The Proposed Project must conform at both levels to be approved.

Conformity requirements apply only in nonattainment and "maintenance" (former nonattainment) areas for the NAAQS, and only for the specific NAAQS that are or were violated. Conformity requirements do not apply in unclassifiable/attainment areas for NAAQS and do not apply at all for state standards regardless of the status of the area.

Regional conformity is concerned with how well the regional transportation system supports plans for attaining the NAAQS for CO, NO_2, O_3, PM_{10} and $PM_{2.5}$, and in some areas (although not in California), SO_2. California has attainment or maintenance areas for all of these transportation-related "criteria pollutants" except SO_2, and also has a nonattainment area for Pb; however, lead is not required to be covered in transportation conformity analysis. Regional conformity is based on emission analysis of Regional Transportation Plans (RTPs) and Federal Transportation Improvement Programs (FTIPs) that include all transportation projects planned for a region over a period of at least 20-years (for the RTP), and 4-years (for the FTIP). RTP and FTIP conformity uses travel demand and emission models to determine whether or not the

implementation of those projects would conform to emission budgets or other tests at various analysis years showing that requirements of the SIP are met. If the conformity analysis is successful, make the determinations that the RTP and FTIP are in conformity with the SIP for achieving the goals of the Clean Air Act. Otherwise, the projects in the RTP and/or FTIP must be modified until conformity is attained. If the design concept, scope, and "open-to-traffic" schedule of a proposed transportation project are the same as described in the RTP and the FTIP, then the project meets regional conformity requirements for purposes of project-level analysis.

Conformity analysis at the project-level includes verification that the Proposed Project is included in the regional conformity analysis and a "hot-spot" analysis if an area is "nonattainment" or "maintenance" for CO and/or PM_{10} or $PM_{2.5}$. A region is "nonattainment" if one or more of the monitoring stations in the region measures a violation of the relevant standard and the USEPA officially designates the area nonattainment. Areas that were previously designated as nonattainment areas but subsequently meet the standard may be officially redesignated to attainment by USEPA, and are then called "maintenance" areas. "Hot-spot" analysis is essentially the same, for technical purposes, as CO or particulate matter analysis performed for NEPA purposes. Conformity does include some specific procedural and documentation standards for projects that require a "hot-spot" analysis. In general, projects must not cause the "hot-spot" related standard to be violated, and must not cause any increase in the number and severity of violations in nonattainment areas. If a known CO or particulate matter violation is located in the project vicinity, the project must include measures to reduce or eliminate the existing violation(s) as well.

2.12.2 Affected Environment

An Air Quality Study Report was developed for the Proposed Project (May, 2014), and is hereby incorporated by reference.

Climate and Meteorology

The Proposed Project is located in the San Diego Air Basin (SDAB), which is within San Diego County. The climate of San Diego County is characterized by warm, dry summers and mild, wet winters. One of the main determinants of the climatology is a semi-permanent high-pressure area (the Pacific High) in the eastern Pacific Ocean. In the summer, this pressure center is located well to the north, causing storm tracks to be directed north of California. This high-pressure cell maintains clear skies for much of the year. When the Pacific High moves southward during the winter, this pattern changes, and low-pressure storms are brought into the region, causing widespread precipitation. In San Diego County, the months of heaviest precipitation are November through April, averaging about 9 to 14 inches annually. The mean temperature is 62.2°F, and the mean maximum and mean minimum temperatures are 75.7°F and 48.5°F, respectively.

The Pacific High also influences the wind patterns of California. The predominant wind directions are westerly and west-southwesterly during all four seasons, and the average annual wind speed is approximately six miles per hour.

A common atmospheric condition known as a temperature inversion, or subsidence inversion, affects air quality in the SDAB. During an inversion, air temperatures get warmer rather than cooler with increasing distance from the ground surface. Subsidence inversions occur during the warmer months (May through October) as descending warmer air associated with the Pacific High comes into contact with cooler marine air below it. The boundary between the warmer and cooler layers of air represents a temperature inversion that traps pollutants between the descending warmer air and the ground surface. The subsidence inversion layer is approximately 2,000 feet above mean sea level during the months of May through October. However, during the remaining months (November through April), the temperature inversion is approximately 3,000 feet above mean sea level. Inversion layers are important elements of local air quality because they inhibit the dispersion of pollutants, thus resulting in a temporary degradation of air quality.

Air Pollutants

"Air Pollution" is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants may adversely affect human or animal health, reduce visibility, damage property, and reduce the productivity or vigor of crops and natural vegetation.

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout an air basin. The major factors affecting air pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants, and the local topography. Air quality issues arise when the rate of pollutant emissions exceeds the rate of dispersion. Air quality in California is commonly expressed as the number of days in which air pollution levels exceed standards set by the California Air Resources Board (ARB) and the USEPA.

The FCAA requires the USEPA to set ambient air quality standards (AAQS) for six common pollutants, known as criteria pollutants. The pollutants regulated as criteria pollutants are: O_3, CO, SO_2, NO_2, Pb, and PM_{10} and $PM_{2.5}$. The National and State AAQS are summarized in **Table 2.12-1**.

TABLE 2.12-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)	0.075 ppm (147 µg/m^3)			
Respirable Particulate Matter (PM_{10})[8]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3	—			
Fine Particulate Matter ($PM_{2.5}$)[8]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[9]	1 Hour	0.18 ppm (339 µg/m m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[10]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[10]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[10]	—	
Lead[11,12]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—	0.15 µg/m^3			
Visibility Reducing Particles[13]	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[11]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

Notes: mg/m^3 = milligrams per cubic meter; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ppm = parts per million; µg/m^3 = micrograms per cubic meter

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m3 is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m3 to 12.0 µg/m3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m3, as was the annual secondary standard of 15 µg/m3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
SOURCE: ARB 2013a
9. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
10. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24- hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
11. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
12. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
13. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

Carbon Monoxide (CO)

CO is a colorless and odorless gas which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. Relatively high concentrations are typically found near crowded intersections and along heavily used roadways carrying slow-moving traffic. Even under the severest meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Overall, CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. CO concentrations are typically higher in winter. As a result, California has required the use of oxygenated gasoline in the winter months to reduce CO emissions.

Ozone (O_3)

O_3 is the principal component of smog and is formed in the atmosphere through a series of reactions involving reactive organic gases and oxides of nitrogen (NO_X) in the presence of sunlight. Reactive organic gases and NO_X are called precursors of O_3. NO_X includes various combinations of nitrogen and oxygen, including nitrogen oxide (NO), nitrogen dioxide (NO_2), nitrogen trioxide (NO_3), etc. O_3 is a principal cause of lung and eye irritation in the urban environment. Significant O_3 concentrations are normally produced in the summer, when atmospheric inversions are greatest and temperatures are high. Reactive organic gases and NO_X emissions are both considered critical in O_3 formation. Control strategies for O_3 have focused on reducing emissions from vehicles, industrial processes using solvents and coatings, and consumer products.

Nitrogen Dioxide (NO_2)

NO_2 is a product of combustion and is generated in vehicles and in stationary sources such as power plants and boilers. NO_2 can cause lung damage. As noted above, NO_2 is part of the NO_X group and is a principal contributor to O_3 and smog.

Sulfur Dioxide (SO_2)

SO_2 is a combustion product, with the primary source being power plants and heavy industries that use coal or oil as fuel. SO_2 is also a product of diesel engine combustion. The health effects of SO_2 include lung disease and breathing problems for asthmatics. SO_2 in the atmosphere contributes to the formation of acid rain. In the SDAB, there is relatively little use of coal and oil; therefore, SO_2 is of lesser concern than in many other parts of the country.

Lead (Pb)

Pb is a stable compound that persists and accumulates both in the environment and in animals. Previously, the Pb used in gasoline anti-knock additives represented a major source of Pb

emissions to the atmosphere. The USEPA began working to reduce Pb emissions soon after its inception, issuing the first reduction standards in 1973, which called for a gradual phase down of Pb to one-tenth of a gram per gallon by 1986. The average Pb content in gasoline in 1973 was 2 to 3 grams per gallon, or about 200,000 tons of Pb a year. In 1975, passenger cars and light trucks were manufactured with a more elaborate emission control system, which included a catalytic converter that required lead-free fuel. In 1995 leaded fuel accounted for only 0.6 percent of total gasoline sales and less than 2,000 tons of Pb per year. Effective January 1, 1996, the FCAA banned the sale of the small amount of leaded fuel that was still available in some parts of the country for use in on-road vehicles. Pb emissions have significantly decreased due to the near elimination of the use of leaded gasoline.

Particulate Matter (PM)

PM is a complex mixture of extremely small particles and liquid droplets. PM is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. Natural sources of particulates include windblown dust and ocean spray.

The size of PM is directly linked to the potential for causing health problems. The USEPA is concerned about particles that are 10 micrometers in diameter or smaller because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Health studies have shown a significant association between exposure to PM and premature death. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems such as heart attacks and irregular heartbeat. Individuals particularly sensitive to fine particle exposure include older adults, people with heart and lung disease, and children. The USEPA groups PM into two categories, $PM_{2.5}$ and PM_{10}, as described below.

Fine Particulate Matter ($PM_{2.5}$)

Fine particles, such as those found in smoke and haze, are 2.5 micrometers in diameter and smaller ($PM_{2.5}$). Sources of fine particles include all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. $PM_{2.5}$ is the major cause of reduced visibility (haze) in California. Control of $PM_{2.5}$ is primarily achieved through the regulation of emission sources, such as the USEPA's Clean Air Interstate Rule and Clean Air Visibility Rule for stationary sources; the 2004 Clean Air Nonroad Diesel Rule, the Tier 2 Vehicle Emission Standards, and Gasoline Sulfur Program; or the ARB Goods Movement reduction plan.

Inhalable Particulate Matter (PM_{10})

Inhalable particles (PM_{10}) include both fine and coarse dust particles; the fine particles are $PM_{2.5}$. Coarse particles, such as those found near roadways and dusty industries, are larger than 2.5 micrometers and smaller than 10 micrometers in diameter. Sources of coarse particles include crushing or grinding operations, and dust from paved or unpaved roads. The health effects of PM_{10} are similar to $PM_{2.5}$. Control of PM_{10} is primarily achieved through the control of dust at construction and industrial sites, the cleaning of paved roads, and the wetting or paving of frequently used unpaved roads.

The criteria pollutants that are most important for this air quality impact analysis are those that can be traced principally to motor vehicles and to earth-moving activities. Of these pollutants, CO, reactive organic gases, NO_X, $PM_{2.5}$, and PM_{10} are evaluated on a regional or "mesoscale" basis. CO is also often analyzed on a localized or "microscale" basis in cases of congested traffic conditions. In December 2010, the FHWA and USEPA released the final guidance for conducting quantitative analyses to evaluate microscale impacts of $PM_{2.5}$ and PM_{10}.

Mobile Source Air Toxics

Mobile Source Air Toxics (MSATs) are compounds emitted from highway vehicles and nonroad equipment. Some toxic compounds are present in fuel and are emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline. The USEPA also extracted a subset of this list of 21 compounds that it now labels as the seven priority MSATs. These are *benzene, formaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, naphthalene, polycyclic organic matter, and 1, 3-butadiene*. While these MSATs are considered the priority transportation toxics, the USEPA stresses that the lists are subject to change and may be adjusted by future regulatory actions.

The USEPA has issued a number of regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines. According to an FHWA analysis, even if the number of vehicle miles traveled increases by 64 percent, reductions of 57 percent to 87 percent in MSATs are projected from 2000 to 2020.

Diesel Exhaust Particulate

The control of emissions from mobile sources is a statewide responsibility of the ARB that has not been delegated to the local air districts. However, the San Diego Air Pollution Control District (SDAPCD) is participating in the administration programs to reduce diesel emissions, principally by procurement and use of replacement vehicles powered by natural gas. Some air districts have issued preliminary project guidance for projects with large or concentrated

numbers of trucks, such as warehouses and distribution facilities. No standards exist for quantitative impact analysis for diesel particulates.

Asbestos

The FCAA requires the USEPA to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with FCAA Section 112, the USEPA established National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. Asbestos was one of the first hazardous air pollutants regulated under this section. On March 31, 1971, the USEPA identified asbestos as a hazardous pollutant, and on April 6, 1973, first promulgated the asbestos NESHAP in 40 CFR 61. In 1990, a revised NESHAP regulation was promulgated by the USEPA.

The asbestos NESHAP regulations protect the public by minimizing the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material. Accordingly, the asbestos NESHAP specifies work practices to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). In addition, the regulations require the project applicant to notify applicable state and local agencies and/or USEPA regional offices before all demolitions or before construction that contains a certain threshold amount of asbestos.

Naturally Occurring Asbestos (NOA)-bearing Serpentine

Serpentine is a mineral commonly found in seismically active regions of California, usually in association with ultramafic rocks and along associated faults. Certain types of serpentine occur naturally in a fibrous form known generically as asbestos. Asbestos is a known carcinogen and inhalation of asbestos may result in the development of lung cancer or mesothelioma. The ARB has regulated the amount of asbestos in crushed serpentinite used in surfacing applications, such as for gravel on unpaved roads, since 1990. In 1998, new concerns were raised about health hazards from activities that disturb asbestos-bearing rocks and soil. In response, the ARB revised their asbestos limit for crushed serpentines and ultramafic rock in surfacing applications from 5 percent to less than 0.25 percent and adopted a new rule requiring best practices dust control measures for activities that disturb rock and soil containing NOA (CDC 2000). According to the report *A General Location Guide for Ultramafic Rocks in California-Area Likely to Contain Naturally Occurring Asbestos* (CDC, 2000), the coastal portion of San Diego County NOA is not typically found in the geological formations present on the Proposed Project site (CDC, 2000). Thus, hazardous exposure to asbestos-containing serpentine materials would not be a concern with the Proposed Project.

Regional and Local Air Quality

Specific geographic areas are classified as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with federal and state standards. If an area

is re-designated from nonattainment to attainment, the FCAA requires a revision to the SIP, called a maintenance plan, to demonstrate how the air quality standard will be maintained for at least 10-years. The Transportation Conformity Rule, 51 Code of Federal Regulations (CFR) 390-464, classifies an area required to develop a maintenance plan as a maintenance area.

The Proposed Project site is located in the SDAB, which currently meets the federal standards for all criteria pollutants, except O_3. On April 15, 2004, the USEPA issued the initial designations for the 8-hour O_3 standard, and the SDAB was classified (and remains classified) as a federal nonattainment area (marginal) for the 8-hour O_3 standard. Marginal is the least severe of the five degrees of O_3 nonattainment[1]. The boundaries of the 8-hour O_3 nonattainment area are the boundaries of San Diego County (ARB, 2013a). The SDAB is a CO attainment-maintenance area, following a 1998 re-designation as a CO federal attainment area.

The Proposed Project site is located in the SDAB, which currently meets the state standards for all criteria pollutants, except O_3, PM_{10} and $PM_{2.5}$. The SDAB is currently classified as a state nonattainment area for O_3, $PM_{2.5}$, and PM_{10} (ARB, 2013a).

Ambient air pollutant concentrations in the SDAB are measured at 11 air quality monitoring stations operated by the SDAPCD. The SDAPCD air quality monitoring station that represents the Proposed Project area, climate, and topography in the SDAB is the Alpine monitoring station, approximately eleven miles northeast of the Proposed Project area. However, the station does not monitor CO or PM_{10}. Thus, to provide data on other pollutants, the next most representative station, Otay Mesa, was used to report ambient concentrations of CO and PM_{10}.

2.12.3 Environmental Consequences

Construction Impacts: Regional Emissions

The principal criteria pollutants emitted during construction would be PM_{10} and $PM_{2.5}$. The source of the pollutants would be fugitive dust created during clearing, grubbing, excavation, and grading; demolition of pavement; vehicle travel on paved and unpaved roads; and windblown material from unprotected graded areas, stockpiles, and haul trucks. Generally, the distance that particles drift from their source depends on their size, emission height, and wind speed. A secondary source of pollutants during construction would be the engine exhaust from construction equipment during all construction activities. The non-attainment pollutants of concern would be NO_X and volatile organic compounds emissions that would contribute to the formation of O_3, which is a regional nonattainment pollutant.

[1] / Federal ozone nonattainment areas are designated as Marginal, Moderate, Serious, Severe, or Extreme, depending on the level of pollution. Each of these classifications comes with required pollution control measures: the more severe the pollution, the more stringent are the required controls, and the longer the area is allowed before it must demonstrate attainment.

Alternatives 1-3: Build Alternatives

Caltrans utilizes federal conformity regulations for CEQA compliance, which requires analysis of construction impacts for projects when construction activities last for more than 5-years at one location. Construction of the Proposed Project, including the non-access intersection improvements, is not expected to last more than 1-year; therefore, no quantitative estimates of regional construction emissions are required for these temporary emissions. A less-than-significant construction impact related to regional emissions would result from implementation of Alternatives 1-3: Build Alternatives.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no construction-related regional emission impact would result.

Construction Impacts: Local Emissions (Hot Spot Analysis)

As mentioned previously, Caltrans utilizes its established protocol for air quality compliance. According to 40 CFR, Part 51, Section 93.123 (5), CO, PM_{10}, and $PM_{2.5}$ hot spot analyses are not required for construction-related activities, which create a temporary increase in air emissions. Temporary is defined as increases that only occur during a construction phase and last 5-years or less at any individual site. A less-than-significant construction impact would result from project implementation.

Alternatives 1-3: Build Alternatives

The construction phase of the Proposed Project would last for approximately one year and would be considered temporary. Thus, no local hot spot is anticipated, and a hot spot analysis is not required.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no construction related local emission impact would result.

Construction Impacts: Odor

Sources of odor during construction include exhaust fumes from diesel-fueled construction equipment and haul trucks, as well as emissions associated with asphalt paving.

Alternatives 1-3: Build Alternatives

Odors associated with the construction of Alternatives 1-3 would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people off-site. As a result, short-term construction odor impacts at off-site land uses would be less-than-significant.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no construction-related odor impact would result.

Long Term Emissions: Regional Air Quality

Alternatives 1-3: Build Alternatives

Alternatives 1-3 include the construction of an access road, as well as improvements to five off-site intersections. The Proposed Project would not generate any new vehicle trips, but rather provide improved traffic flow through the access road and off-site intersection locations. Therefore, the regional emissions of concern in this analysis are related to construction activities only. A less-than-significant long term emissions impact would result from project implementation.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no long-term regional air quality impact would result.

Local Air Quality: Hot Spot Analysis

Alternatives 1-3: Build Alternatives

Carbon Monoxide

As part of environmental reviews Caltrans requires that projects not cause or contribute to any new localized CO or PM violations or increase the frequency or severity of any existing CO or PM violations in CO and PM nonattainment and maintenance areas. The CO portion of the Rule applies to the Proposed Project because the SDAB is classified as a federal CO maintenance area. Procedures and guidelines for use in evaluating the potential local level CO impacts of a project are contained in Transportation Project-Level Carbon Monoxide Protocol (CO Protocol; University of California, Davis—Institute of Transportation Studies 1997). The CO Protocol provides a methodology for determining the level of analysis, if any, required on a project. The guidelines comply with the FCAA, federal conformity rules, the National Environmental Policy

Act (NEPA), and the CEQA. The CO Protocol states that the determination of project-level CO impacts should be carried out in accordance with the Local CO Analysis.

The Proposed Project is in a CO attainment-maintenance area, following a 1998 re-designation from a CO nonattainment area and continued attainment has been verified with the SDAPCD. Thus, the primary concern would be if the Proposed Project would worsen air quality. The Proposed Project has the potential to affect local air quality due to increased congestion at local intersections. As shown in **Table 2.12-2**, the Proposed Project traffic report identifies five signalized intersections that would operate at LOS E or LOS F under the 2035 build conditions: SR-94/Via Mercado, SR-94/Jamacha Boulevard, SR-94/Jamacha Road, SR-94/Steele Canyon Road, and SR-94/Proctor Valley Road/Jefferson Road. Additionally, the Proposed Project would signalize the intersection of SR-94/ Lyons Valley Road, which is currently unrestricted along SR-94.

The SR-94/ Jamacha Boulevard intersection would experience an increase in the delay or worsening of traffic flow under the 2035 conditions, the SR-94/Jamacha Road intersection would have the greatest traffic volumes, and the SR-94/Lyons Valley Road intersection would experience the greatest delay change along SR-94 due to the new signalized intersection. Therefore a detailed CO hot spot analysis was conducted for these intersections. Curbside CO concentrations were estimated using the CALINE-4 dispersion model developed by Caltrans, using peak-hour AM and PM traffic volumes and worst-case meteorological assumptions. Worst-case meteorological conditions include low wind speed and stable atmospheric conditions producing the highest CO concentrations for each case. Similarly, all approach volumes for the intersections, including left turn lanes, were modeled using emissions factors for idling vehicles, while all departing vehicle emissions were modeled at 5 miles per hour. This is conservative as the departure speeds would be higher, which would result in lower emission factors and provide a margin of safety in the emissions calculations. The highest 1-hour background concentration of CO reported by the SDAPCD was 2.4 ppm in 2012 at the El Cajon monitoring station, which was used as the background concentration for all modeling conditions in 2015 and 2035 and added to the Proposed Project's contribution. This is considered conservative as it is the highest recorded concentration in 2012 and concentrations of CO are expected to drop due to fuel reformulations, and increases fuel efficiency requirements for new vehicles.

TABLE 2.12-2
SIGNALIZED INTERSECTION LOS ANALYSIS

Intersection	Peak Hour	2015 No Build		2015 Build		2035 No Build		2035 Build	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
SR-94/Via Mercado	AM	44.2	D	44.2	D	**178.7**	**F**	**178.7**	**F**
	PM	**91.7**	**F**	**91.7**	**F**	**312.4**	**F**	**312.4**	**F**

TABLE 2.12-2 cont.
SIGNALIZED INTERSECTION LOS ANALYSIS

Intersection	Peak Hour	2015 No Build		2015 Build		2035 No Build		2035 Build	
		Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
SR-94/Jamacha Boulevard	AM	18.8	B	23.0	C	**29.6**	**C**	**56.0**	**E**
	PM	**57.1**	**E**	50.4	D	**84.5**	**F**	**85.2**	**F**
SR-94/Jamacha Road	AM	36.1	D	29.7	C	**61.6**	**E**	49.0	D
	PM	**94.2**	**F**	**61.3**	**E**	**185.6**	**F**	**133.8**	**F**
SR-94/Cougar Canyon Road	AM	34.7	C	34.7	C	41.5	D	41.5	D
	PM	45.6	D	45.6	D	43.4	D	43.4	D
SR-94/Steele Canyon Road	AM	43.9	D	23.1	C	50.9	D	25.6	C
	PM	**119.7**	**F**	28.6	C	**124.4**	**F**	31.4	C
SR-94/Proctor Valley Road/Jefferson Road	AM	53.2	D	53.2	D	**388.9**	**F**	**388.9**	**F**
	PM	**61.1**	**E**	**61.1**	**E**	**321.6**	**F**	**321.6**	**F**
SR-94/Lyons Valley Road *	AM	**U**	**F**	41.2	D	**U**	**F**	51.0	D
	PM	**U**	**F**	39.4	D	**U**	**F**	40.5	D

Notes: **Bold** entries indicated LOS E or F intersections.
* = Unsignalized

The results of the CO hotspot modeling for intersections is shown in **Table 2.12-3**, which indicates that the traffic delays resulting from the Proposed Project would not exceed the 1-hour or 8-hour NAAQS or CAAQS limit for CO and would not create a CO hotspot. CO receptor locations are shown in **Figures 2.12-1** through **2.12-2**.

TABLE 2.12-3
ESTIMATED FUTURE MAXIMUM CO CONCENTRATIONS

Intersection	Peak Hour	2015 Build		2035 Build	
		1-hr	8-hr	1-hr	8-hr
SR-94/Jamacha Boulevard	AM	8.2	5.74	6.9	4.83
	PM	11.9	8.33	6.9	4.83
SR-94/Jamacha Road	AM	9.1	6.37	5.8	4.06
	PM	10.3	7.21	7.5	5.25
SR-94/Lyons Valley Road	AM	6.4	4.48	4.1	2.87
	PM	9.1	6.37	5.2	3.64

Notes:
ppm = parts per million
Federal Standards: 1-hour 35 ppm, 8-hour 9 ppm
State Standards: 1-hour 20 ppm, 8-hour 9.0 ppm

Particulate Matter

On March 10, 2006, the USEPA published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in $PM_{2.5}$ and PM_{10} nonattainment and maintenance areas (FHWA 2006). PM hot-spot analyses are required for projects of local air quality concern. This would include certain highway and transit projects that involve significant levels of diesel vehicle traffic and any other project identified in the PM SIP as a localized air quality concern (EPA 2013a). While the SDAB is not a federally designated $PM_{2.5}$ or PM_{10} nonattainment or maintenance area and there is no PM SIP for San Diego, it is designated as a state nonattainment area for both pollutants. Thus, to be conservative, the Proposed Project is assessed using the procedures outlined in the *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas* (EPA 2010). This document represents the Caltrans PM Guidance. The PM Guidance describes procedures and requirements for preparing qualitative and quantitative $PM_{2.5}$ and PM_{10} hot spot analyses.

A hot spot analysis assesses the air quality impacts on a scale smaller than an entire nonattainment or maintenance area, including, for example, congested roadway intersections and highways or transit terminals. Such an analysis is a means of demonstrating that a transportation project supports state and local air quality goals with respect to potential localized air quality impacts.

Projects of Air Quality Concern

The USEPA final rule requires $PM_{2.5}$ and PM_{10} hot spot analyses to be performed for "projects of air quality concern." Projects not identified as projects of air quality concern (POAQC) are considered to meet statutory requirements without any further hot spot analyses.

The PM Guidance defines POAQC as projects within a federally designated $PM_{2.5}$ or PM_{10} nonattainment or maintenance area, and one of the following types of projects:

- New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
- Projects affecting intersections that are LOS D, E, or F with a significant number of diesel vehicles, or those that will change to LOS D, E, or F, because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- New bus and rail terminals, and transfer points, that result in a significant number of diesel vehicles at a single location;

- Expanded bus and rail terminals, and transfer points, that result in a significant increase in the number of diesel vehicles at a single location; and

- Projects identified in the $PM_{2.5}$ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

The PM Guidance contains examples of POAQC and examples of projects that are not an air quality concern. Under the example of POAQC, a significant volume for a new highway or expressway is defined as facilities with an annual ADT volume of 125,000 or more. A significant number of diesel vehicles is defined as 8 percent or more of the total annual ADT as diesel truck traffic.

The access improvements that are the subject of this analysis do not affect any transit facilities (e.g., bus/rail terminals or transfer points). As indicated, the Proposed Project would signalize four currently unsignalized intersections, which once signalized would operate at LOS B or better in the near term and in the horizon year (**Table 2.12-3**). While the intersection would operate at LOS D in the near term, according to the Caltrans *2011 Annual Average Daily Truck Traffic on the California State Highway System*, the percentage of total truck traffic on SR-94 at Post Mile 19.4 (Lyons Valley Road, approximately 1 mile west of the Proposed Project), is 6 to7 percent. The annual average daily traffic (ADT) volumes on SR-94 are approximately 161,000. While this volume would define the SR-94 as a potential POAQC, the percentage of total trucks is relevant, as these vehicles typically represent the diesel vehicles operating on a road. The mix of vehicles using this roadway segment would be similar in the future to the existing conditions along the identified section of highway, thus, the total diesel vehicles operating at this intersection would be less than 8 percent. Additionally, the Proposed Project is not located in a federally designated $PM_{2.5}$ and/or PM_{10} nonattainment or maintenance area. The Proposed Project does not meet the criteria of a POAQC as defined in the PM Guidance, and no further analysis is required. As the project is not a POAQC, no impact would occur from implementation of the Proposed Project.

<u>Alternative 4: No Project Alternative</u>

Alternative 4: No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no hot spot impact would result.

Mobile Source Air Toxics

<u>Alternatives 1-3: Build Alternatives</u>

The purpose of the Proposed Project is to improve an existing access point and intersection operations by restriping and minor alignment modifications, constructing a dedicated turn lane, and installing signals. This Proposed Project has been determined to generate minimal air

quality impacts for FCAA criteria pollutants and has not been linked with any special MSAT concerns. As such, this Proposed Project therefore would not result in changes in traffic volumes, vehicle mix, basic Proposed Project location, or any other factor that would cause a substantial increase in MSAT impacts compared to the existing conditions. Therefore, Alternatives 1-3 are considered a Category 1 project. Under the FHWA and USEPA guidance, Category 1 project have no meaningful MSAT effects.

United States Environmental Protection Agency regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades. Based on regulations now in effect, an analysis of national trends with the USEPA's forecasts a combined reduction of over 80 percent in the total annual emission rate for the priority MSAT from 2010 to 2050, while vehicle-miles of travel are projected to increase by over 100 percent. This would both reduce the background level of MSAT as well as the possibility of even minor MSAT emissions from this Proposed Project. Therefore, Alternatives 1-3 would result in no meaningful effects to mobile source air toxics. A less-than-significant impact would result from project implementation.

Alternative 4: No Project Alternative

The No Project Alternative would not result in physical improvements to SR-94 or area streets; therefore, no mobile source air toxic impact would result.

Climate Change

The California Global Warming Solutions Act of 2006 (also known as Assembly Bill 32) requires that California reduce its GHG emissions to 1990 levels by 2020. SB 97, passed in 2007, expressly recognizes the need to analyze greenhouse gas emissions as a part of the CEQA process. Climate change impacts of the Proposed Project are assessed in Section 2.13.

2.12.4 Avoidance, Minimization and/or Mitigation Measures

No avoidance, minimization and/or mitigation measures are required for air quality. However, the following Caltrans Standard Measures would be implemented to further reduce construction emissions:

(1) Minimize, to the maximum extent feasible, land disturbance,

(2) Use watering trucks to minimize dust; watering should be sufficient to confine airborne dust to the Project work areas,

(3) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent airborne dust,

(4) Cover all trucks hauling dirt when traveling at speeds greater than 15 miles per hour,

(5) Stabilize the surface of dirt piles if not removed within two days,

(6) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads,

(7) Minimize unnecessary vehicular and machinery activities,

(8) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway,

(9) Revegetate disturbed land, including vehicular paths created during construction, to avoid future off-road vehicular activities,

(10) Remove on-site construction materials that remain unused after the Proposed Project is constructed, and

(11) Locate construction equipment and truck staging and maintenance areas as far as feasible and downwind of schools, active recreation areas, and other areas of high population density.

LEGEND

CO Hotspot Receptor Location

Project Study Areas

N

0 200 400 Feet

Figure 2.12-1

Carbon Monoxide Hotspot Receptors at the SR-94/Jamacha Blvd. and SR-94/Jamacha Rd. Intersections

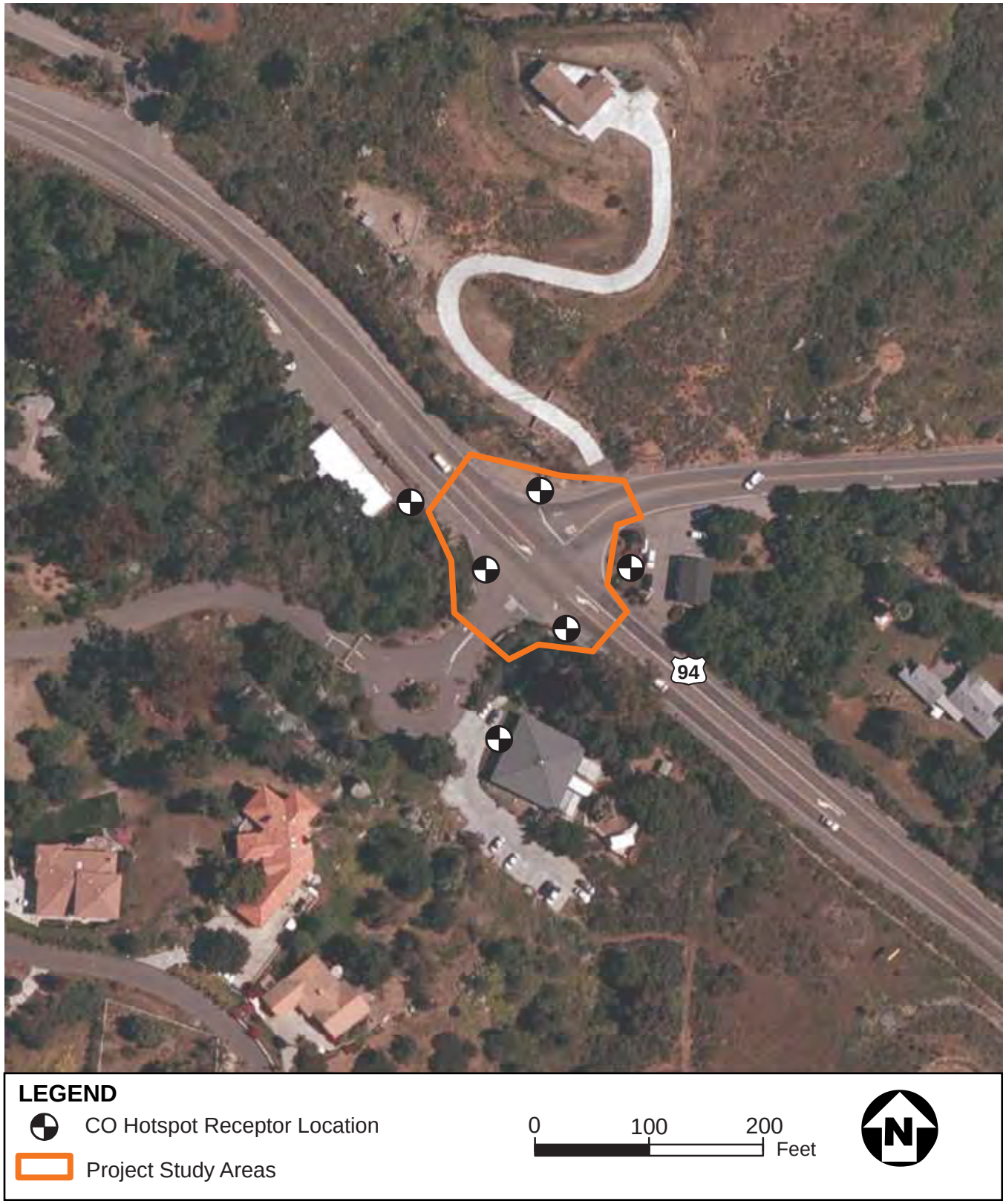


Figure 2.12-2
Carbon Monoxide Hotspot Receptors at the SR-94/Lyons Valley Rd. Intersection

2.13 CLIMATE CHANGE

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to greenhouse gas (GHG) emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change (IPCC) by the United Nations and World Meteorological Organization in 1988 has led to increased efforts devoted to GHG emissions reduction and climate change research and policy. These efforts are primarily concerned with the emissions of GHGs generated by human activity including CO_2, CH_4, N_2O, tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF_6), HFC-23 (fluoroform), HFC-134a (s, s, s, 2-tetrafluoroethane), and HFC-152a (difluoroethane).

In the U.S., the main source of GHG emissions is electricity generation, followed by transportation. In California, however, transportation sources (including passenger cars, light-duty trucks, other trucks, buses, and motorcycles) make up the largest source of GHG-emitting sources. The dominant GHG emitted is CO_2, mostly from fossil fuel combustion.

There are typically two terms used when discussing the impacts of climate change: “Greenhouse Gas Mitigation” and “Adaptation.” "Greenhouse Gas Mitigation" is a term for reducing GHG emissions to reduce or "mitigate" the impacts of climate change. “Adaptation" refers to the effort of planning for and adapting to impacts resulting from climate change (such as adjusting transportation design standards to withstand more intense storms and higher sea levels)[1].

There are four primary strategies for reducing GHG emissions from transportation sources: (1) improving the transportation system and operational efficiencies, (2) reducing travel activity, (3) transitioning to lower GHG-emitting fuels, and (4) improving vehicle technologies/efficiency. To be most effective all four strategies should be pursued cooperatively. [2]

2.13.1 Regulatory Setting

State

With the passage of several pieces of legislation including State Senate and Assembly bills and Executive Orders, California launched an innovative and pro-active approach to dealing with GHG emissions and climate change.

[1]/ http://climatechange.transportation.org/ghg_mitigation/
[2]/ http://www.fhwa.dot.gov/environment/climate_change/mitigation/

Assembly Bill 1493 (AB 1493), Pavley, Vehicular Emissions: Greenhouse Gases, 2002: This bill requires the California ARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with the 2009-model year.

Executive Order S-3-05 (EO) (June 1, 2005): The goal of this EO is to reduce California's GHG emissions to: 1) year 2000 levels by 2010, 2) year 1990 levels by the 2020, and 3) 80 percent below the year 1990 levels by 2050. In 2006, this goal was further reinforced with the passage of Assembly Bill 32.

Assembly Bill 32 (AB 32), Núñez and Pavley, The Global Warming Solutions Act of 2006: AB 32 sets the same overall GHG emissions reduction goals as outlined in EO S-3-05, while further mandating that ARB create a scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases."

Executive Order S-20-06 (October 18, 2006): This order establishes the responsibilities and roles of the Secretary of the California Environmental Protection Agency (Cal/EPA) and state agencies with regard to climate change.

Executive Order S-01-07 (January 18, 2007): This order set forth the low carbon fuel standard for California. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least ten percent by the year 2020.

Senate Bill 97 (SB 97) Chapter 185, 2007, Greenhouse Gas Emissions: required the Governor's Office of Planning and Research (OPR) to develop recommended amendments to the California Environmental Quality Act (CEQA) Guidelines for addressing GHG emissions. The amendments became effective on March 18, 2010.

Senate Bill 375 (SB 375), Chapter 728, 2008, Sustainable Communities and Climate Protection: This bill requires ARB to set regional emissions reduction targets from passenger vehicles. The Metropolitan Planning Organization (MPO) for each region must then develop a "Sustainable Communities Strategy" (SCS) that integrates transportation, land-use, and housing policies to plan for the achievement of the emissions target for their region.

Senate Bill 391 (SB 391) Chapter 585, 2009 California Transportation Plan: This bill requires the State's long-range transportation plan to meet California's climate change goals under AB 32.

Federal

Although climate change and GHG reduction are a concern at the federal level, currently no regulations or legislation have been enacted specifically addressing GHG emissions reductions

and climate change at the project level. Neither the USEPA nor the FHWA has issued explicit guidance or methods to conduct project-level GHG analysis.[3] FHWA supports the approach that climate change considerations should be integrated throughout the transportation decision-making process, from planning through project development and delivery. Addressing climate change mitigation and adaptation up front in the planning process will assist in decision-making and improve efficiency at the program level, and will inform the analysis and stewardship needs of project-level decision-making. Climate change considerations can be integrated into many planning factors, such as supporting economic vitality and global efficiency, increasing safety and mobility, enhancing the environment, promoting energy conservation, and improving the quality of life.

The four strategies outlined by FHWA to lessen climate change impacts correlate with efforts that the state is undertaking to deal with transportation and climate change; these strategies include improved transportation system efficiency, cleaner fuels, cleaner vehicles, and a reduction in travel activity.

Climate change and its associated effects are being addressed through various efforts at the federal level to improve fuel economy and energy efficiency, such as the "National Clean Car Program" and EO 13514 - *Federal Leadership in Environmental, Energy and Economic Performance*.

Executive Order 13514 (October 5, 2009): This order is focused on reducing greenhouse gases internally in federal agency missions, programs and operations, but also direct federal agencies to participate in the Interagency Climate Change Adaptation Task Force, which is engaged in developing a national strategy for adaptation to climate change.

USEPA's authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, USEPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six greenhouse gases constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Act and USEPA's assessment of the scientific evidence that form the basis for USEPA's regulatory actions. USEPA in conjunction with the National Highway Traffic Safety Administration (NHTSA) issued the first of a series of GHG emission standards for new cars and light-duty vehicles in April 2010.[4]

---

[3]/ To date, no national standards have been established regarding mobile source GHGs, nor has USEPA established any ambient standards, criteria or thresholds for GHGs resulting from mobile sources.
[4]/ http://www.c2es.org/federal/executive/epa/greenhouse-gas-regulation-faq

The USEPA and NHTSA are taking coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. These next steps include developing the first-ever GHG regulations for heavy-duty engines and vehicles, as well as additional light-duty vehicle GHG regulations.

The final combined standards that made up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The standards implemented by this program are expected to reduce GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016).

On August 28, 2012, USEPA and NHTSA issued a joint Final Rulemaking to extend the national program for fuel economy standards to model year 2017 through 2025 passenger vehicles. Over the lifetime of the model year 2017-2025 standards this program is projected to save approximately four billion barrels of oil and two billion metric tons of GHG emissions.

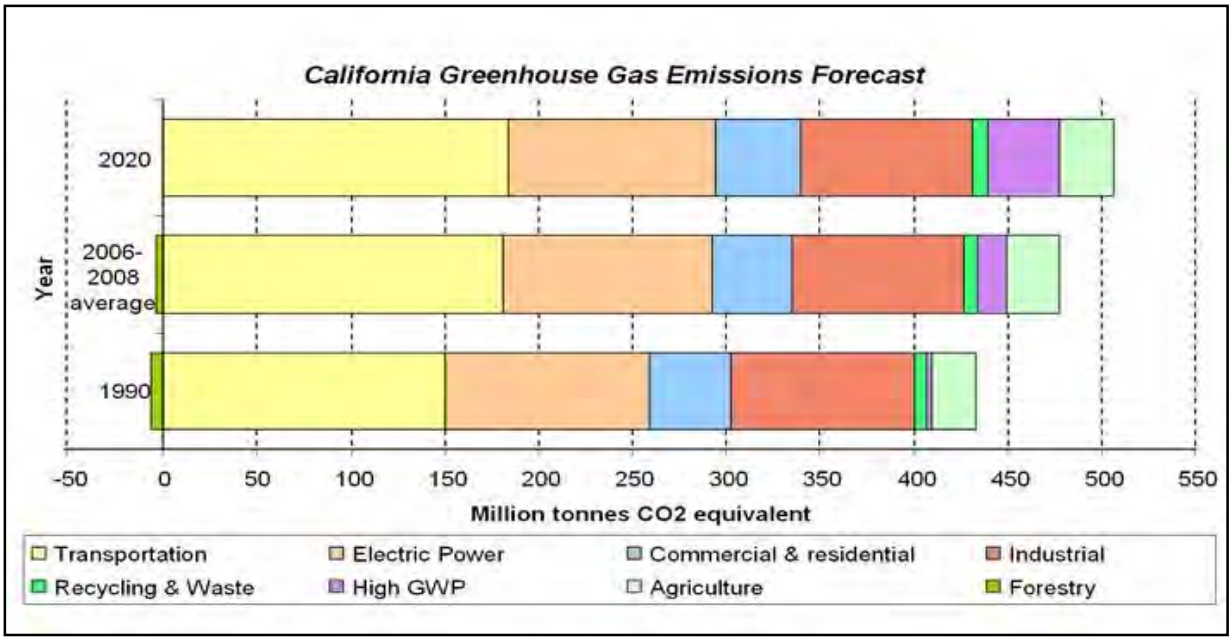
The complementary USEPA and NHTSA standards that make up the Heavy-Duty National Program apply to combination tractors (semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles (including buses and refuse or utility trucks). Together, these standards will cut greenhouse gas emissions and domestic oil use significantly. This program responds to President Barack Obama's 2010 request to jointly establish greenhouse gas emissions and fuel efficiency standards for the medium- and heavy-duty highway vehicle sector. The agencies estimate that the combined standards will reduce CO2 emissions by about 270 million metric tons and save about 530 million barrels of oil over the life of model year 2014 to 2018 heavy duty vehicles.

2.13.2 Proposed Project Analysis

An individual project does not generate enough GHG emissions to significantly influence global climate change. Rather, global climate change is a cumulative impact. This means that a project may contribute to a potential impact through its *incremental* change in emissions when combined with the contributions of all other sources of GHG.[5] In assessing cumulative impacts, it must be determined if a project's incremental effect is "cumulatively considerable" (CEQA Guidelines Sections 15064(h)(1) and 15130). To make this determination, the incremental impacts of the project must be compared with the effects of past, current, and probable future projects. To gather sufficient information on a global scale of all past, current, and future projects to make this determination is a difficult, if not impossible, task.

[5]/ This approach is supported by the AEP: Recommendations by the Association of Environmental Professionals on How to Analyze GHG Emissions and Global Climate Change in CEQA Documents (March 5, 2007), as well as the South Coast Air Quality Management District (Chapter 6: The CEQA Guide, April 2011) and the US Forest Service (Climate Change Considerations in Project Level NEPA Analysis, July 13, 2009).

The AB 32 Scoping Plan mandated by AB 32 includes the main strategies California will use to reduce GHG emissions. As part of its supporting documentation for the Draft Scoping Plan, the ARB released the GHG inventory for California (forecast last updated: October 28, 2010). The forecast is an estimate of the emissions expected to occur in 2020 if none of the foreseeable measures included in the Scoping Plan were implemented. The base year used for forecasting emissions is the average of statewide emissions in the GHG inventory for 2006, 2007, and 2008.



Source: http://www.arb.ca.gov/inventory/data/forcast.htm

Figure 2.13-1
California Greenhouse Gas Forecast

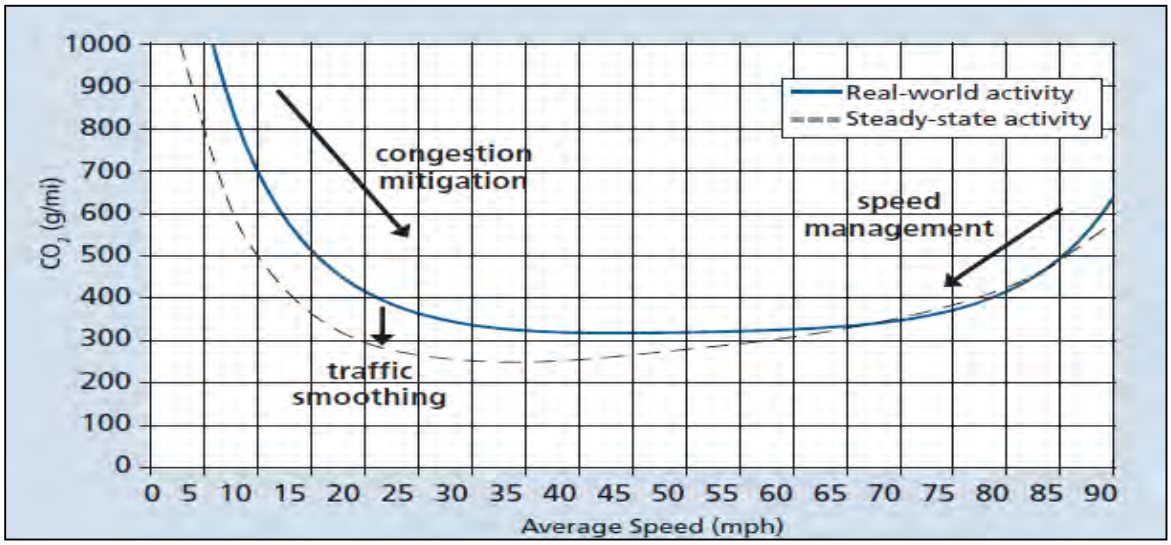
Caltrans and its parent agency, the Transportation Agency, have taken an active role in addressing GHG emission reduction and climate change. Recognizing that 98 percent of California's GHG emissions are from the burning of fossil fuels and 40 percent of all human made GHG emissions are from transportation, Caltrans has created and is implementing the Climate Action Program at Caltrans that was published in December 2006.[6]

Greenhouse gas emissions for transportation projects can be divided into those produced during construction and those produced during operations. Construction GHG emissions include emissions produced as a result of material processing, emissions produced by onsite construction equipment, and emissions arising from traffic delays due to construction. These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases. In addition, with innovations such as longer

[6]/ Caltrans Climate Action Program is located at the following web address:
http://www.dot.ca.gov/hq/tpp/offices/ogm/key_reports_files/State_Wide_Strategy/Caltrans_Climate_Action_Program.pdf

pavement lives, improved traffic management plans, and changes in materials, the GHG emissions produced during construction can be mitigated to some degree by longer intervals between maintenance and rehabilitation events.

One of the main strategies in Caltrans' Climate Action Program to reduce GHG emissions is to make California's transportation system more efficient. The highest levels of CO_2 from mobile sources such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour (see **Figure 2.13-2**). To the extent that a project relieves congestion by enhancing operations and improving travel times in high congestion travel corridors GHG emissions, particularly CO_2, may be reduced.



Source: Traffic congestion and Greenhouse Gases, *http://onlinepubs.trb.org/onlinepubs/tnews268.pdf*

Figure 2.13-2
Possible Effect of Traffic Operation Strategies
In Reducing On-Road CO_2 Emissions

Because, as discussed above under the analysis of growth-inducing impacts, the Proposed Project does not increase traffic capacity on SR-94, the Proposed Project has little to no potential for climate change effects. The improvements implemented as part of the Proposed Project will help to alleviate traffic congestion and enhance local traffic circulation. Congestion relief achieved as a result of the Proposed Project will help to reduce idling times, acceleration, and braking, which have all been established as contributors to air pollution. The Proposed Project will realign a portion of SR-94 to create a safer access point to the Tribal Lands as well as construct intersection improvements to reduce overall delay times of all vehicles operating at these intersections and the effects on climate change would be very small.

As the Proposed Project would improve traffic flow and decrease overall congestion in the Proposed Project area, the Proposed Project would not increase operational greenhouse gas emissions. Therefore, the Proposed Project would result in no greenhouse gas emission impact.

Construction Emissions

Greenhouse gas emissions for transportation projects can be divided into those produced during construction and those produced during operations. Construction GHG emissions include emissions produced as a result of material processing, emissions produced by onsite construction equipment, and emissions arising from traffic delays due to construction. These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases. In addition, with innovations such as longer pavement lives, improved traffic management plans, and changes in materials, the GHG emissions produced during construction can be mitigated to some degree by longer intervals between maintenance and rehabilitation events. Thus, while Project greenhouse gas emissions will temporarily increase due to construction machinery and idling motorists during lane closures, the Proposed Project will result in no impact to greenhouse gas emissions.

2.13.3 Greenhouse Gas Reduction Strategies

Figure 2.13-3
Mobility Pyramid

Caltrans continues to be involved on the Governor's Climate Action Team as the ARB works to implement Executive Orders S-3-05 and S-01-07 and help achieve the targets set forth in AB 32. Many of the strategies Caltrans is using to help meet the targets in AB 32 come from then-Governor Arnold Schwarzenegger's Strategic Growth Plan for California. The Strategic Growth Plan targeted a significant decrease in traffic congestion below 2008 levels and a corresponding reduction in GHG emissions, while accommodating growth in population and the economy. The Strategic Growth Plan relies on a complete systems approach to attain CO2 reduction goals: system monitoring and evaluation, maintenance and preservation, smart land use and demand management, and operational improvements as shown in **Figure 2.13-3**: The Mobility Pyramid.

Caltrans is supporting efforts to reduce vehicle miles traveled by planning and implementing smart land use strategies: job/housing proximity, developing transit-oriented communities, and

high-density housing along transit corridors. Caltrans works closely with local jurisdictions on planning activities but does not have local land use planning authority.

Caltrans also assists efforts to improve the energy efficiency of the transportation sector by increasing vehicle fuel economy in new cars, light and heavy-duty trucks; Caltrans is doing this by supporting on-going research efforts at universities, by supporting legislative efforts to increase fuel economy, and by participating on the Climate Action Team. It is important to note, however, that control of fuel economy standards is held by the USEPA and ARB.

Caltrans is also working towards enhancing the State's transportation planning process to respond to future challenges. Similar to requirements for regional transportation plans under Senate Bill (SB) 375 (Steinberg 2008), SB 391(Liu 2009) requires the State's long-range transportation plan to meet California's climate change goals under Assembly Bill (AB) 32.

The California Transportation Plan (CTP) is a statewide, long-range transportation plan to meet our future mobility needs and reduce GHG emissions. The CTP defines performance-based goals, policies, and strategies to achieve our collective vision for California's future, statewide, integrated, multimodal transportation system.

The purpose of the CTP is to provide a common policy framework that will guide transportation investments and decisions by all levels of government, the private sector, and other transportation stakeholders. Through this policy framework, the CTP 2040 will identify the statewide transportation system needed to achieve maximum feasible GHG emission reductions while meeting the State's transportation needs.

Table 2.13-1 summarizes the efforts that Caltrans is implementing to reduce GHG emissions. More detailed information about each strategy is included in the Climate Action Program at Caltrans (December 2006) Caltrans Director's Policy 30 (DP-30) Climate Change (June 22, 2012): is intended to establish a Caltrans policy that will ensure coordinated efforts to incorporate climate change into Caltrans decisions and activities.

Caltrans Activities to Address Climate Change (April 2013)[7] provides a comprehensive overview of activities undertaken by Caltrans statewide to reduce greenhouse gas emissions resulting from agency operations.

[7] http://www.dot.ca.gov/hq/tpp/offices/orip/climate_change/projects_and_studies.shtml

TABLE 2.13-1
CLIMATE CHANGE/CO2 REDUCTION STRATEGIES

Strategy	Program	Partnership		Method/Process	Estimated CO2 Savings Million Metric Tons (MMT)	
		Lead	Agency		2010	2020
Smart Land Use	Intergovernmental Review (IGR)	Caltrans	Local governments	Review and seek to mitigate development proposals	Not Estimated	Not Estimated
	Planning Grants	Caltrans	Local and regional agencies & other stakeholders	Competitive selection process	Not Estimated	Not Estimated
	Regional Plans and Blueprint Planning	Regional Agencies	Caltrans	Regional plans and application process	.975	7.8
Operational Improvements & Intelligent Transportation System (ITS) Deployment	Strategic Growth Plan	Caltrans	Regions	State ITS; Congestion Management Plan	.07	2.17
Mainstream Energy & GHG into Plans and Projects	Office of Policy Analysis & Research; Division of Environmental Analysis	Interdepartmental effort		Policy establishment, guidelines, technical assistance	Not Estimated	Not Estimated
Educational & Information Program	Office of Policy Analysis & Research	Interdepartmental, CalEPA, ARB, CEC		Analytical report, data collection, publication, workshops, outreach	Not Estimated	Not Estimated
Fleet Greening & Fuel Diversification	Division of Equipment	Department of General Services		Fleet Replacement B20 B100	.0045	.0065 .045 .0225
Non-vehicular Conservation Measures	Energy Conservation Program	Green Action Team		Energy Conservation Opportunities	.117	.34
Portland Cement	Office of Rigid Pavement	Cement and Construction Industries		2.5 % limestone cement mix 25% fly ash cement mix > 50% fly ash/slag mix	1.2 .36	4.2 3.6
Goods Movement	Office of Goods Movement	Cal EPA, ARB, BT&H, MPOs		Goods Movement Action Plan	Not Estimated	Not Estimated
Total					2.72	18.18

The following measures will also be included in the Proposed Project to reduce the GHG emissions and potential climate change impacts from the Proposed Project:

1. Caltrans and the California Highway Patrol are working with the County to implement ITS to help manage the efficiency of the existing highway system. ITS commonly consists of electronics, communications, or information processing used singly or in combination to improve the efficiency or safety of a surface transportation system. ITS is included in the Build Alternatives.

2. The Proposed Project would incorporate the use of energy-efficient lighting, such as LED traffic signals. LED bulbs cost $60 to $70 each, but last five to six years, compared to the one-year average lifespan of the incandescent bulbs previously used. The LED bulbs themselves consume 10 percent of the electricity of traditional lights, which will also help reduce the Proposed Projects CO_2 emissions.[8]

3. According to Caltrans Standard Specifications, the contractor must comply with all local APCD rules, ordinances, and regulations for air quality restrictions.

Adaptation Strategies

"Adaptation strategies" refer to how Caltrans and others can plan for the effects of climate change on the state's transportation infrastructure and strengthen or protect the facilities from damage. Climate change is expected to produce increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and intensity, and the frequency and intensity of wildfires. These changes may affect the transportation infrastructure in various ways, such as damage to roadbeds from longer periods of intense heat; increasing storm damage from flooding and erosion; and inundation from rising sea levels. These effects will vary by location and may, in the most extreme cases, require that a facility be relocated or redesigned. There may also be economic and strategic ramifications as a result of these types of impacts to the transportation infrastructure.

At the federal level, the Climate Change Adaptation Task Force, co-chaired by the Council on Environmental Quality (CEQ), the Office of Science and Technology Policy (OSTP), and the National Oceanic and Atmospheric Administration (NOAA), released its interagency task force progress report on October 28, 2011[9], outlining the federal government's progress in expanding and strengthening the Nation's capacity to better understand, prepare for, and respond to extreme events and other climate change impacts. The report provides an update on actions in key areas

[8] Knoxville Business Journal, "LED Lights Pay for Themselves," May 19, 2008 at http://www.knoxnews.com/news/2008/may/19/led-traffic-lights-pay-themselves/.

[9] http://www.whitehouse.gov/administration/eop/ceq/initiatives/adaptation

of federal adaptation, including: building resilience in local communities, safeguarding critical natural resources such as freshwater, and providing accessible climate information and tools to help decision-makers manage climate risks.

Climate change adaptation must also involve the natural environment as well. Efforts are underway on a statewide-level to develop strategies to cope with impacts to habitat and biodiversity through planning and conservation. The results of these efforts will help California agencies plan and implement mitigation strategies for programs and projects.

On November 14, 2008, then-Governor Arnold Schwarzenegger signed EO S-13-08 which directed a number of state agencies to address California's vulnerability to sea level rise caused by climate change. This EO set in motion several agencies and actions to address the concern of sea level rise.

In addition to addressing projected sea level rise, the California Natural Resources Agency (Resources Agency) was directed to coordinate with local, regional, state, and federal public and private entities to develop The California Climate Adaptation Strategy (Dec 2009)[10], which summarizes the best known science on climate change impacts to California, assesses California's vulnerability to the identified impacts, and then outlines solutions that can be implemented within and across state agencies to promote resiliency.

The strategy outline is in direct response to EO S-13-08 that specifically asked the Resources Agency to identify how state agencies can respond to rising temperatures, changing precipitation patterns, sea level rise, and extreme natural events. Numerous other state agencies were involved in the creation of the Adaptation Strategy document, including the California Environmental Protection Agency; Business, Transportation and Housing; Health and Human Services; and the Department of Agriculture. The document is broken down into strategies for different sectors that include: Public Health; Biodiversity and Habitat; Ocean and Coastal Resources; Water Management; Agriculture; Forestry; and Transportation and Energy Infrastructure. As data continues to be developed and collected, the state's adaptation strategy will be updated to reflect current findings.

The National Academy of Science was directed to prepare a Sea Level Rise Assessment Report[11] to recommend how California should plan for future sea level rise. The report was released in June 2012 and included:

[10] http://www.energy.ca.gov/2009publications/CNRA-1000-2009-027/CNRA-1000-2009-027-F.PDF
[11] *Sea Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* (2012) is available at: http://www.nap.edu/catalog.php?record_id=13389.

- Relative sea level rise projections for California, Oregon and Washington taking into account coastal erosion rates, tidal impacts, El Niño and La Niña events, storm surge and land subsidence rates.
- The range of uncertainty in selected sea level rise projections.
- A synthesis of existing information on projected sea level rise impacts to state infrastructure (such as roads, public facilities and beaches), natural areas, and coastal and marine ecosystems.
- A discussion of future research needs regarding sea level rise.

In 2010, interim guidance was released by The Coastal Ocean Climate Action Team (CO-CAT) as well as Caltrans as a method to initiate action and discussion of potential risks to the states infrastructure due to projected sea level rise. Subsequently, CO-CAT updated the Sea Level Rise guidance to include information presented in the National Academies Study.

All state agencies that are planning to construct projects in areas vulnerable to future sea level rise are directed to consider a range of sea level rise scenarios for the years 2050 and 2100 to assess project vulnerability and, to the extent feasible, reduce expected risks and increase resiliency to sea level rise. Sea level rise estimates should also be used in conjunction with information on local uplift and subsidence, coastal erosion rates, predicted higher high water levels, storm surge and storm wave data

All projects that have filed a NOP as of the date of the EO S-13-08, and/or are programmed for construction funding through 2013, or are routine maintenance projects may, but are not required to, consider these planning guidelines. While the Proposed Project did not file an NOP within this time period, the Proposed Project is outside the coastal zone and direct impacts to transportation facilities due to projected sea level rise are not expected.

Executive Order S-13-08 also directed the Business, Transportation, and Housing Agency to prepare a report to assess vulnerability of transportation systems to sea level rise affecting safety, maintenance and operational improvements of the system, and economy of the state. Caltrans continues to work on assessing the transportation system vulnerability to climate change, including the effect of sea level rise.

Currently, Caltrans is working to assess which transportation facilities are at greatest risk from climate change effects. However, without statewide planning scenarios for relative sea level rise and other climate change effects, Caltrans has not been able to determine what change, if any, may be made to its design standards for its transportation facilities. Once statewide planning scenarios become available, Caltrans will be able review its current design standards to determine what changes, if any, may be needed to protect the transportation system from sea level rise.

Climate change adaptation for transportation infrastructure involves long-term planning and risk management to address vulnerabilities in the transportation system from increased precipitation and flooding; the increased frequency and intensity of storms and wildfires; rising temperatures; and rising sea levels. Caltrans is an active participant in the efforts being conducted in response to EO S-13-08 and is mobilizing to be able to respond to the National Academy of Science Sea Level Rise Assessment Report.

2.13.4 Avoidance, Minimization and Mitigation Measures

No avoidance, minimization and mitigation measures are required.

2.14 NOISE

2.14.1 Regulatory Setting

The California Environmental Quality Act (CEQA) provides the broad basis for analyzing and abating highway traffic noise effects. The intent of these laws is to promote the general welfare and to foster a healthy environment.

Determination for noise impact under CEQA is based on a comparison between the existing noise levels and the build noise levels. Under CEQA, the noise assessment entails looking at the setting of the noise impact and then how large or perceptible a noise increase would be in the given area under future and existing.

Noise Sensitive Area (NSA)/Receptor Site is an area involving regular human use or activities that would be susceptible to adverse impacts due to highway traffic-generated noise. NSAs typically include residences, churches, schools, parklands, or hospitals, and may include individual sites, groups of sites, or an entire community. Individual analysis sites within the NSA are called Noise Receptor Sites.

A significant environmental effect under CEQA generally is defined as a substantial or potentially substantial adverse change in the physical environment. The increase in traffic noise caused by a project is the primary factor considered by Caltrans in assessing the significance of noise impacts under CEQA. Key considerations when determining a significant traffic noise impact under CEQA include whether there is an increase between existing and projected noise levels, the uniqueness of the setting, the sensitive nature of the noise receptors, the magnitude of the noise increase, the number of noise receptors affected, and the absolute noise level.

The noise measurement sites, or representative noise receptors, are locations where noise measurements are taken in order to determine existing noise levels and to verify or calibrate computer noise models. Locations that are expected to receive the greatest noise impacts are generally chosen. These sites are chosen as being representative of similar sensitive sites in the area.

Changes in noise levels of 3 dBA or less are generally not detectable by the average healthy human ear and the difference in noise would not be expected to be perceptible. **Figure 2.14-1** shows the noise levels of common indoor and outdoor activities.

A Noise Study Report (August 2014) was prepared for the proposed project and is incorporated by reference into this Final EIR.

2.14.2 Existing Noise Environment

SR-94/Jamacha Boulevard Intersection

At the northeastern end of the Proposed Project limits is the SR-94/Jamacha Boulevard Intersection. SR-94 is a four-lane facility west of Jamacha Boulevard and a six-lane facility east of Jamacha Boulevard. The SR-94/Jamacha Boulevard Intersection has two eastbound thru-lanes and three westbound thru-lanes, as well as additional dedicated turning lanes on both sides of the intersection.

Rolling topography exists around the intersection. Road improvements on SR-94 have recently been completed, and a sound wall has been constructed in conjunction with road widening (new eastbound lane) from Via Mercado, past Jamacha Boulevard, to Jamacha Road. The nearest development is the Skyline Wesleyan Church located immediately north and northwest of the intersection. Local traffic using the SR-94/Jamacha Boulevard intersection originates from development off of Jamacha Boulevard.

Jamacha Boulevard, which terminates at the SR-94 intersection, has four travel lanes and an additional left turn lane at the intersection. Traveling in a southwesterly direction from the intersection, land uses along Jamacha Boulevard include undeveloped open space land that gives way to residential development. This transitions to commercial development between Calavo Drive and Sweetwater Springs Boulevard. No schools, colleges, libraries, hospitals or parks exist adjacent to the Proposed Project limits.

The nearest residences to the SR-94/Jamacha Boulevard intersection are located approximately 1,500 feet to the west at the Avenida Roberta cul-de-sac.

SR-94/Jamacha Road Intersection

SR-94 is a six-lane facility west of the Jamacha Road intersection to the Jamacha Boulevard intersection. Jamacha Road is a six-lane expressway with two two-way turn lanes east of the Jamacha Road intersection. SR-94 continues as a four-lane expressway with one southbound dedicated turn lane and two northbound dedicated turn lanes south of the Jamacha Road intersection.

This intersection is characterized by its urban setting and flat topography. The majority of the setting is urbanized and is surrounded by commercial and retail centers, a gasoline service station, and a San Diego County Department of Public Works corporation yard located southwest

of the intersection. No schools, colleges, churches, libraries, hospitals or parks exist adjacent to the Proposed Project limits.

SR-94/Steele Canyon Road Intersection

SR-94 is a two-lane facility with a two-way left turn lane. Steele Canyon Road, which terminates at this intersection, has two lanes. This intersection is characterized primarily by commercial land uses and steep topography. There are residential land uses north of the intersection that access SR-94 via Steele Canyon Road. No schools, colleges, churches, libraries, hospitals or parks exist within the Proposed Project limits.

SR-94/Lyons Valley Road Intersection

In the area of the intersection, SR-94 is a two-lane facility with a two-way left turn lane. Lyons Valley Road is a two-lane road with a right turn lane at this intersection. This intersection is characterized by a variety of land uses, steep topography, and an adjacent drainage channel. Surrounding land uses include the Taproot Montessori Preschool directly south of the intersection, commercial land uses on the northeast and southwest corners, and access to a residence off the northwest corner of the intersection (via Lyons Valley Road).

No colleges, churches, libraries, hospitals or parks exist at or near the intersection. As mentioned previously, the Taproot Montessori Pre-School is located southeast of the intersection with access directly onto the intersection.

SR-94/Maxfield Road Intersection

This intersection is characterized by a variety of land uses, steep topography, and an adjacent drainage channel. Surrounding land uses are generally commercial land uses, with the exception of a residential land use located directly southwest of the intersection. Additional residential uses are located further east of the intersection. In the area of the intersection, SR-94 is a two-lane conventional highway with a left turn lane in the north/west bound direction. Maxfield Road is a two-lane road controlled by a one-way stop sign. No colleges, churches, libraries, hospitals or parks exist at or near the intersection.

Access Alignments

The Access Road Alignment study area is centered around the portion of SR-94 that extends from Melody Road to the south away from Jamul, California. The Proposed Project limits consist of a 4,500 foot segment of SR-94, a 570 foot portion of Melody Road, and the immediately surrounding area. The area south of Melody Road and west of SR-94 is undeveloped. Single-family residences are scattered along the east and west side of SR-94 north of Melody Road and north and south along Melody Road. A fire station is located on SR-94

south of Melody Road and a few residences are located further east from SR-94 beyond the fire station. A church is also located immediately west of the JIV Tribal Lands.

Existing Noise Receivers

Most surrounding land uses are located at a higher elevation than the existing roadway; however, the land uses surrounding Melody Road are at a similar elevation as the existing roadway. The noise receivers analyzed are located in residential and commercial areas along SR-94/Melody Road and in proximity to SR-94/Jamacha Boulevard, SR-94/Jamacha Road, SR-94/Steele Canyon Road, SR-94/Lyons Valley Road, and SR-94/Maxfield Road.

This analysis includes 60 receivers that represent 30 single-family residential units, the Taproot Preschool Montessori, a sports field, two churches, one fire station, an industrial use, a restaurant and outdoor eating area, and 22 retail commercial uses.

Existing Noise Level Measurements

Site visits and noise measurements were conducted on September 26 and 27, 2012. During the measurement period the hourly equivalent noise level (L_{eq}) noise levels ranged from 57 to 71 dBA L_{eq} depending on the distance from SR-94. For each measurement location, the sound level meter was placed 5 feet above the existing ground elevation. A summary of the long term (24-hour) measurements is provided in **Table 2.14-1** below and the locations are shown in **Figures 2.14-2** through **2.14-5**. Long term measurement data, **Table 2.14-1**, indicate that the loudest periods of the day in the northern end of the Proposed Project limits occur during the 7:00 a.m. hour. Short term (ST) noise levels were measured between the hours of 3:00 p.m. and 4:30 p.m. at selected receivers and other points of interest within the Proposed Project limits. These measurements were adjusted to the loudest hour based on the difference between loudest hour and the short-term measurement times. Weather conditions were clear and warm, 70 degrees Fahrenheit (°F) to 85°F, with a slight breeze, less than 2–3 mph with gusts reaching 5 mph each day. Short term noise measurement locations are shown on **Figures 2.14-2** through **2.14-5**, and at worst hour have a range from 58 dBA at Melody Road to 71dBA at SR-94 and Jamacha.

Due to on-site activities, such as landscaping maintenance and parking lot noise, ST-4 was not taken at an acoustically representative location for Skyline Church. Measurement ST-4 was taken near SR-94 to isolate traffic noise, which is approximately 500 feet south of the nearest on-site building. At this distance noise levels would attenuate to 61 dBA L_{eq} or less from noise level reductions due to geometric spreading alone. Since roadways are a continuous noise source, background noise (i.e., noise without the traffic noise from local roadways) is not easily

TABLE 2.14-1
SUMMARY OF 24-HOUR MEASUREMENTS

Date	Time	L_{eq} (dBA)	Date	Time	L_{eq} (dBA)
9/26/2012	10:00	63.7	9/26/2012	22:00	60.4
9/26/2012	11:00	64.3	9/26/2012	23:00	59.3
9/26/2012	12:00	64.0	9/27/2012	00:00	58.1
9/26/2012	13:00	64.3	9/27/2012	01:00	55.2
9/26/2012	14:00	64.5	9/27/2012	02:00	55.1
9/26/2012	15:00	64.7	9/27/2012	03:00	55.6
9/26/2012	16:00	64.9	9/27/2012	04:00	58.8
9/26/2012	17:00	64.2	9/27/2012	05:00	61.5
9/26/2012	18:00	63.8	9/27/2012	06:00	64.3
9/26/2012	19:00	62.4	9/27/2012	07:00	**65.2**
9/26/2012	20:00	61.6	9/27/2012	08:00	64.1
9/26/2012	21:00	60.6	9/27/2012	09:00	63.9
Note: **Bold** numbers indicate the loudest hour.					

estimated at 51 dBA L_{eq}, based on the average L90 measurement (which represents the noise level exceeded 90 percent of the time during the measurement).

Based on the 24-hour measurement, the noisiest hour (i.e., the greatest volumes at full speed) along the segment near the SR-94 and Melody Road intersection occurs during the late afternoon commute period. Measurements ST-1-3, ST-7, and ST-8 were taken outside the loudest hour and were adjusted upward for purposes of characterizing the loudest hour at the measurement locations. The adjustment is based on the difference between the loudest hour and the time the ST measurement was taken. The difference was then added to the short term measurement to make it representative of the loudest hour at that location.

The dominant existing noise source in the Proposed Project limits is traffic noise from major area roadways including SR-94, Jamacha Road, Jamacha Boulevard, Steele Canyon Road, and Lyons Valley Road. Smaller local roadways, including Melody Road and Maxfield Road, had limited traffic and only a minor effect on ambient noise levels in the Proposed Project limits.

2.14.3 Environmental Consequences

Noise levels were predicted at all receivers, including noise measurement locations, using the FHWA Traffic Noise Model (TNM) and various input parameters to compare the predicted traffic noise levels after implementation of the Proposed Project with adjusted measured traffic noise levels at common points. Traffic noise levels were predicted for SR-94 at the Non-Access Road Intersections, and between post mile 20.4 and 21.4 for the Access Road Alignments based on proposed improvements.

Non-Access Road Intersections

The proposed improvements would include signalization, restriping, grading activities, and provision of additional through/turn lanes. Not all activities would be required at each intersection; rather, this list represents the range of anticipated activities. Of these improvements, the restriping and creation of new lanes closer to noise receivers would have the greatest potential for a permanent increase in affected local receivers. However, the additional lanes at the intersections would remain within the existing right-of-way and would require the adjustment of existing lanes. The results of the noise modeling for the existing and horizon year (2035) with the Proposed Project condition at each intersection are presented in **Table 2.14-2**.

In 2035 the traffic noise modeling noise levels would range from 33 to 77 dBA L_{eq}, with the difference between existing and 2035 ranging from 2 to 5 dBA. The primary cause for increases in horizon (2035) traffic noise levels under all Alternatives would be from non-Proposed Project related increases in traffic on SR-94 and local roadways and minor Proposed Project-related realignment of traffic lanes at the five intersections. Changes in noise levels of this order would be barely perceptible to the average human ear. Therefore, the Non-Access Road Intersection improvements would result in a less than-significant-noise impact.

TABLE 2.14-2
NON-ACCESS ROAD IINTERSECTION EXISTING VS. FUTURE NOISE COMPARISON

Receiver	Land Use	Existing dBA L_{eq}	2035 Build dBA L_{eq}	2035 Change vs Existing dBA L_{eq}
R-26	Church	62	64	2
R-27	Vacant Commercial	70	74	4
R-28	Retail	67	70	3
R-29	Retail	65	68	3
R-30	Retail	73	77	4
R-31	Retail	73	76	3

TABLE 2.14-2 cont.
NON-ACCESS ROAD IINTERSECTION EXISTING VS. FUTURE NOISE COMPARISON

Receiver	Land Use	Existing dBA L_{eq}	2035 Build dBA L_{eq}	2035 Change vs Existing dBA L_{eq}
R-32	Retail	67	71	4
R-33	Retail	67	72	5
R-34	Industrial	66	70	4
R-35	Restaurant	56	60	4
R-36	Restaurant	53	58	5
R-37	Retail	52	56	4
R-38	Sports Field	49	53	4
R-39	Residential	60	63	3
R-40	Residential	59	62	3
R-41	Residential	59	62	3
R-42	Retail	69	72	3
R-43	Residential	55	58	3
R-44	Retail	68	71	3
R-45	Retail	68	72	4
R-46	Residential	51	54	3
R-47	Retail	70	73	3
R-48	Retail	66	69	3
R-49	Retail	61	63	2
R-50	Residential	49	53	4
R-51	Residential	56	59	3
R-52	Residential	36	39	3
R-53	Retail	68	71	3
R-54	Day Care	56	60	4
R-55	Retail	59	62	3
R-56	Residential	53	57	4
R-57	Residential	47	52	5
R-58	Retail	57	62	5
R-59	Retail	39	43	4

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

The primary cause for increases in future noise levels related to the Proposed Project is the use of the various Access Road Alignments from foreseeable future projects. Noise impacts would vary from one Access Road Alignment to another depending upon the distance between the road alignment in question and noise receptors in the area. Modeling was conducted for the horizon year, 2035, based on the Proposed Project traffic report. The result of the horizon year modeling is presented in **Table 2.14-3**, which assumes the same traffic conditions for all Alternatives and compares the changes in noise levels associated with the different alignments. As shown in **Table 2.14-3**, the Build Alternatives would result in noise levels ranging from 44 to 65 dBA L_{eq} at the receivers with a 0 to +9 dBA change in noise levels due to differences in the alternatives. The 9 dBA change is located at Receiver 21, and would occur only with Alternative 3: Melody Road.

Changes in noise levels from 0-3 dBA would not be perceptible to the average human ear. From 3 dBA to the projects maximum increase of 9 dBA (Melody Road Alternative Only). As shown in table 2.14-2, for alternative one and two, only 2 receptors would have a perceptible change in their noise levels with project in 2035. Alternative three, results in 5 receptors having an increase in noise levels from 5 to 9 dBA. The overall noise levels would not exceed any localized thresholds or approach the NAC, as can be seen in Table 2.14-3, therefore this would not be considered a significant impact. If Alternative 3: Melody Road is chosen as the Preferred Alternative coordination will take place with the homeowner to determine a feasible solution to the noise impact. Therefore, Alternatives 1 and 2 would have a less-than-significant noise impact. Alternative 3, if chosen as the preferred alternative, would have a less-than-significant impact with mitigation.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative. Thus while, the No Project Alternative would not result in any traffic noise impacts, traffic noise increases of 1 to 7 dBA L_{eq} would still occur along the main line and at the non-access intersection improvements.

TABLE 2.14-3
PREDICTED HORIZON YEAR (2035) TRAFFIC NOISE IMPACTS FOR ACCESS ALIGNMENTS

Receiver ID	Location or Address	Land Use	Existing dBA L_{eq}	Alternative 1 dBA L_{eq}	Change vs Existing dBA L_{eq}	Alternative 2 dBA L_{eq}	Change vs Existing dBA L_{eq}	Alternative 3 dBA L_{eq}	Change vs Existing dBA L_{eq}
R1	13967 Highway 94	Commercial	63	63	0	63	0	63	0
R2	13975 Highway 94	Commercial	62	63	1	63	1	63	1
R3	14022 Hillside Dr	Residential	53	53	0	53	1	54	1
R4	14017 Hillside Dr	Residential	56	57	1	57	1	57	1
R5	14022 Highway 94 A	Residential	55	56	1	56	2	57	2
R6	14022 Highway 94 B	Residential	62	62	0	62	0	63	1
R7	14019 Highway 94	Commercial	64	64	0	64	0	65	1
R8	14075 Short Ct	Residential	55	56	1	56	1	56	1
R9	14027 Hillside Dr	Residential	56	56	0	56	0	56	0
R10	14024 Highway 94	Residential	56	57	1	57	1	57	1
R11	14023 Campo Dr	Residential	55	56	1	56	1	56	1
R12	14043 Highway 94	Residential	50	51	1	52	2	52	2
R13	14051 Campo Rd	Residential	57	58	1	58	1	58	1
R14	14061 Campo Rd	Residential	42	44	2	44	2	44	2
R15	14018 Las Palmas Rd	Residential	57	58	1	58	1	58	1
R16	14013 Las Palmas Rd	Residential	56	57	1	57	1	57	1
R17	14031 Las Palmas Rd	Residential	50	53	3	54	4	55	5
R18	14066 Highway 94	Residential	53	56	3	57	1	58	5
R19	3023 Calle Mesquite	Residential	46	49	3	49	3	51	5
R20	3015 Calle Mesquite	Residential	46	50	4	50	4	53	7
R21	3007 Calle Mesquite	Residential	47	53	6	53	6	56	9
R22	14024 Peaceful Valley Ranch Rd	Fire Station	58	61	3	61	3	59	1
R23	14102 Peaceful Valley Ranch Rd	Residential	42	44	2	44	2	44	2
R24	44114 Campo Rd	Residential	46	48	2	47	1	47	1
R25	Jamul Tribal Lands Church	Religious	46	47	1	48	2	48	2

Construction Noise Impacts

Non-Access Road Intersections

Construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, removal of existing pavement, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also would bring materials to the site and remove the spoils from excavation.

Under load conditions, diesel engine noise levels may be 85 to 90 dBA at a distance of 50 feet from the equipment. Occasional pavement breaking would be performed, which would generate noise levels of 90 dBA at 50 feet from the equipment. Construction equipment noise is considered a "point source" and, attenuates over distance at a rate of 6 dBA for each doubling of distance. Thus, a noise level of 85 dBA at 50 feet would be 79 dBA at 100 feet and 73 dBA at 200 feet from the source.

During excavating, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Although maximum noise levels may be 85 to 90 dBA at a distance of 50 feet during most construction activities, hourly average noise levels near the edge of the Proposed Project limits are anticipated to be 75 dBA L_{eq} or less.

Construction activities at each Non-Access Road Intersection would be shorter in duration than the Access Road Alignment improvements. The nearest sensitive receptors at these intersections are as follows:

- Based on a site visit, the nearest sensitive receiver to the SR-94/Jamacha Boulevard intersection is a residential receiver approximately 1,500 feet to the southwest.

- There is one Category C receiver near the SR-94/Jamacha Road intersection, a restaurant outdoor dining area (approximately 150 feet to the southeast). All other land uses surrounding this intersection are commercial retail.

- The nearest sensitive receivers to the SR-94/Steele Canyon Road intersection are a residence approximately 100 feet to the southwest of the intersection and the next nearest is a residence approximately 100 feet north of the westernmost limit of the improvements.

- The nearest sensitive receiver to the SR-94/Lyons Valley Road intersection is the Taproot Montessori Preschool at approximately 135 feet to the southeast.

- The nearest sensitive receiver to the SR-94/Maxfield Road intersection is a residence approximately 275 feet to the southwest.

The nearest of any of the receivers is approximately 100 feet from construction activity. At distances of 100 feet or greater, construction noise levels would attenuate to 68 dBA L_{eq} or less, while maximum noise levels would attenuate to 80 dBA Lmax or less. Noise levels on this order are typical; of construction projects and would not result in adverse impacts to local residents. Given the anticipated construction noise levels and that construction noise would be short-term, intermittent, and overshadowed by local traffic noise, construction-related noise is a less-than-significant impact.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

The nearest receiver is the residence represented by R-6 (Figure 2.12-5), which is approximately 60 feet from the center of proposed construction activities at the north end of the Proposed Project limits. Hourly construction noise levels at this distance would attenuate to 73 dBA L_{eq} or less and maximum construction noise during pavement breaking activities, which would be located at greater distances, would attenuate to 84 dBA L_{max} or less. Given the anticipated construction noise level and that construction noise would be short-term, intermittent, and overshadowed by local traffic noise, construction-related noise is a less-than-significant impact.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; therefore, no construction noise impact would result.

2.14.4 Avoidance, Minimization and Mitigation Measures

No avoidance, minimization and/or mitigation measures are required given that overall noise levels would not exceed any localized thresholds or approach the NAC.

The following Caltrans Standard Measures would be implemented for construction:

(1) Do not exceed 86 dBA L_{max} at 50 feet from the job site activities from 9 p.m. to 6 a.m. Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler,

(2) Each internal combustion engine would be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine would be operated on the Proposed Project without said muffler,

(3) Staging areas would be located at least 250 feet from occupied residences. Work in staging areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.,

(4) If traffic control and construction signs that require power for lighting or flashing are located within 500 feet of residential units, the source of power would be batteries, solar cells, or another quiet source. Gas- or diesel-fueled internal combustion engines would not be used in these instances, and

(5) Except as required for safety, pavement breaking activities would be restricted to the hours of 7:30 a.m. to 7:00 p.m. Monday through Friday and would not be allowed on Saturdays, Sundays, or holidays.

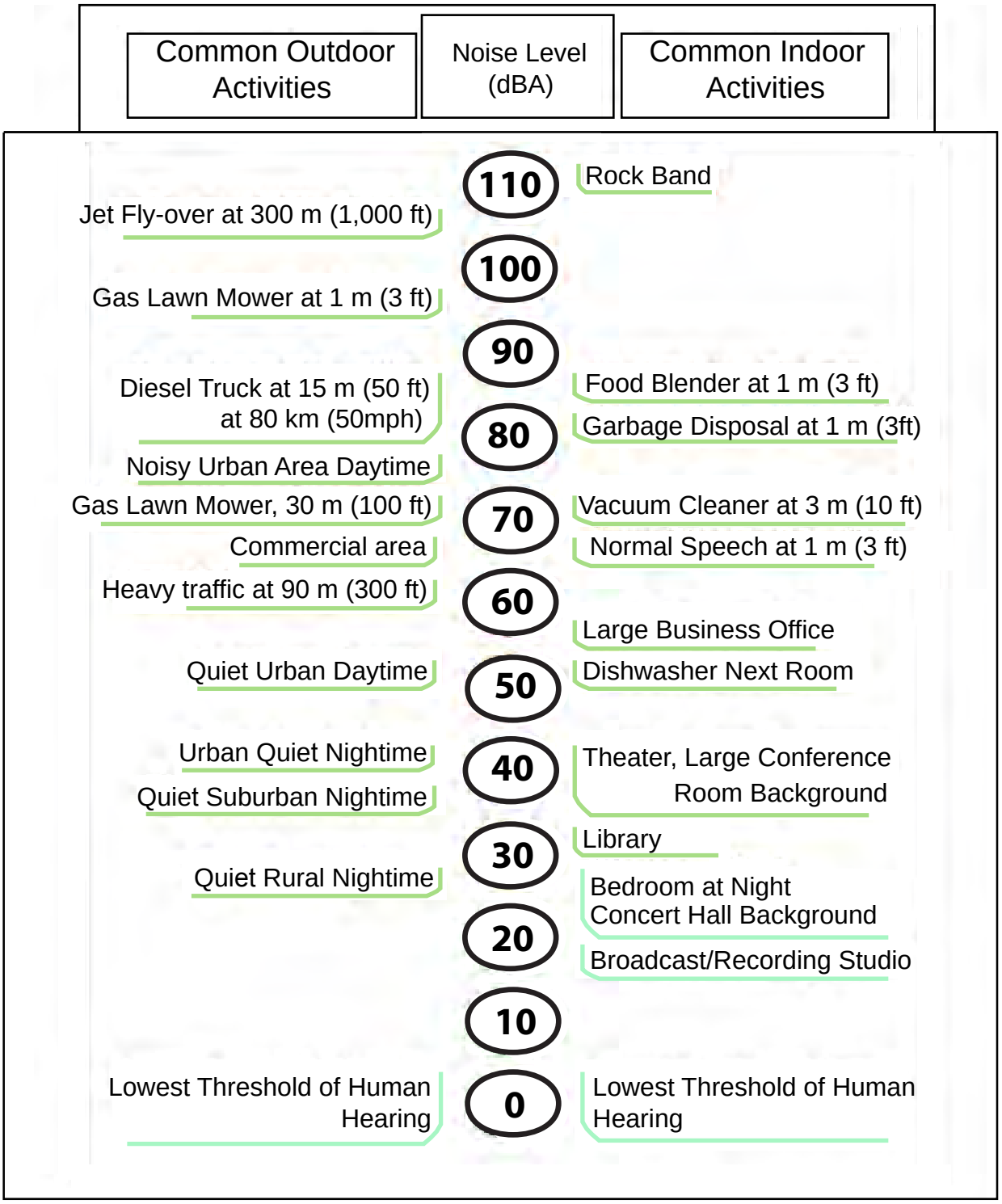


Figure 2.14-1
Noise Levels of Common Activities

Figure 2.14-2

Noise Measurement and Noise Receptor Locations for Jamacha Blvd. and Jamacha Rd. Intersections

Figure 2.14-3

Noise Measurement and Noise Receptor Locations for Steele Canyon Rd. Intersection

Figure 2.14-4

Noise Measurement and Noise Receptor Locations for Lyons Valley Rd. and Maxfield Rd. Intersections

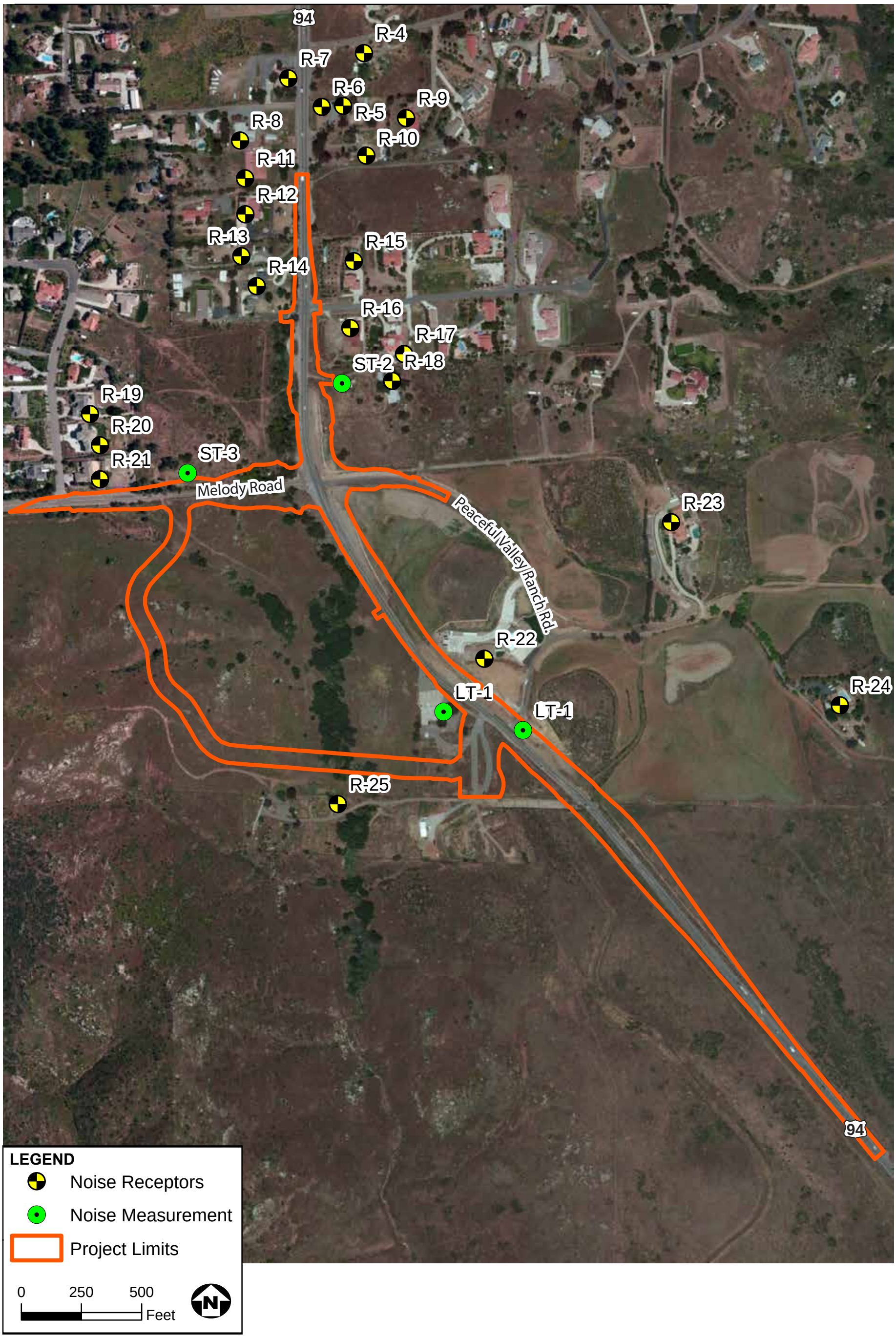


Figure 2.14-5
Noise Measurement and Noise Receptor Locations for Melody Rd. Intersection

2.15 ENERGY

2.15.1 Regulatory Setting

CEQA Guidelines, Appendix F, Energy Conservation, state that EIRs are required to include a discussion of the potential energy impacts of Proposed Projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.

2.15.2 Affected Environment

Energy consumption can be measured as short-term construction energy use and long-term operational energy use. Short-term construction energy use is the energy expended during construction of the roadway improvements, which includes (1) energy used to extract and process raw materials, (2) energy used to transport materials to the Proposed Project limits, and (3) energy used during construction. Short-term expenditure is affected, in part, by the distance and weight of materials to be used at the Proposed Project limits. Other construction-related factors affect energy use, such as mixing concrete at a batch plant and then delivering it to the site for pouring versus mixing concrete within or at the Proposed Project limits. Additionally, energy used during construction includes equipment/employee transport to and from the site, site clearing/preparation and construction of the facilities. Employee transport and site clearing and preparation begins at the start of construction and ends when equipment has been removed from the site. Diesel fuel is used to power earth moving equipment and gasoline is used to power personal vehicles to and from the Proposed Project limits. Construction of the facilities begins when construction trailers are installed or when temporary power is established at the site. Site clearing/grading and construction phases may overlap. Other short-term energy costs could include additional energy consumed by vehicles as they wait in traffic during construction-related lane closures. These energy costs last as long as lane closures are needed to complete the Proposed Project. These short-term energy costs are dependent on materials and methods of construction and include equipment and overhead costs.

Long-term energy use is the energy consumed in the operation of the constructed facilities, which could include energy to operate and maintain new facilities (e.g., signals, retaining walls, etc.), land use shifts that occur as a consequence of the Proposed Project, and possible changes to mobility that occur due to the Proposed Project. Light-emitting diode (LED) technology has been used for traffic signals since the 1980s when LED bulbs started replacing incandescent lighting, thus providing an energy savings. LED traffic lights use 80 to 90 percent less energy and last five to 10 times longer than incandescent halogen bulbs. LED signals and pedestrian modules generally use 9-25 watts, compared to 75-150 watts by an incandescent signal. Another long term use of energy is stop-and-go traffic conditions related to poor LOS levels. The existing and future non-Proposed Project LOS of area intersections/roadways for the Proposed Project limits is presented in Section 2.3. This situation decreases fuel efficiency, increases fuel consumption,

and increases wear and tear on vehicles (increasing oil, tire and break pad use). The choice of transportation mode (personal vehicle, public transit, cycling, or walking) also has an influence on energy use. Self-propelled locomotion (cycling and walking) is generally reserved for shorter trip distances and results in no expenditure of fossil fuels. Personal vehicle use and public transit result in the burning of fossil fuels. When comparing energy use used in personal vehicles to public transit, it should be noted that on a per person trip basis, personal vehicles require more energy because they allow for fewer passengers than public transit. It is conceivable that people may feel discouraged from walking or riding, influenced by the perception that perhaps sidewalks and bike lanes do not provide the desired element of safety. As a result, people may divert away from a non-motorized mode to a motorized mode of travel, adding to traffic and, in turn, increasing fuel consumption.

2.15.3 Environmental Consequences

Alternatives 1-3: Build Alternatives

Proposed Project construction activities would increase energy consumption during the short-term, which is defined as the construction period for the Proposed Project (18-24 months). Construction activities resulting in energy use include activities such as employee transport to and from the site, use of construction machinery during site preparation and facility construction, temporary delays caused by use of traffic control measures, and the import/export of materials/equipment. The Build Alternatives would use energy during construction in the same manner; however, they would vary in degree depending on the amount of work required to complete each task. For example, construction of the facilities under Alternative 2: Daisy Drive Access Alignment; Option 3 Minimum Footprint would expend less energy than Alternative 3: Melody Road Access Alignment due to the increased amount of construction activities required for Alternative 3: Melody Road Access Alignment (site preparation, roadbed, retaining walls, length of construction period etc.). The Proposed Project's construction-related energy use is temporary in nature (i.e., lasting no more than two years) and would; therefore, not represent a significant demand on energy resources.

Once operational, the Proposed Project would result in long-term energy savings through more efficient flow of traffic on the newly improved roadways and intersections. The savings in operational energy requirements is anticipated to result in a net savings in energy use in the long term. The improved LOS and reduced congestion at the intersections/access alignments would decrease travel times for motorists and support less vehicle operating time, thus reducing fuel consumption.

When balancing energy used during temporary construction against energy saved by relieving congestion and other transportation efficiencies during long-term operation, the Proposed Project would result in a less-than-significant impact.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no new energy use impact would result. However, long-term energy savings would not occur because there would be no traffic flow improvements.

2.15.4 Avoidance, Minimization and Mitigation Measures

No avoidance, minimization and mitigation measures are required. The following Caltrans Standard Measures would be implemented to reduce energy consumption during construction.

(1) Use recycled materials, such as asphalt and concrete roadway materials through creation of road-base materials after crushing and grinding,

(2) Salvage material such as roadside sign posts, and sign structures, chain link fence fabric, lighting standards, and/or traffic signal standards and appurtenances,

(3) Use energy-efficient construction vehicles to the extent feasible,

(4) Use LED lights in traffic signals and pedestrian modules,

(5) Incorporate low water use landscaping, and

(6) Develop and implement a comprehensive TMP to increase driver awareness, ease congestion, and minimize delay during construction.

BIOLOGICAL ENVIRONMENT

The analyses of natural communities, wetlands, threatened and endangered species and other plant and animal species, and invasive species within the Proposed Project limits are based upon the Natural Environment Study (NES) prepared in June 2014 for the Proposed Project, which is incorporated herein by reference.

2.16 NATURAL COMMUNITIES

This section of the document discusses natural communities of concern. The focus of this section is on biological communities, not individual plant or animal species. This section also includes information on wildlife corridors and habitat fragmentation. Wildlife corridors are areas of habitat used by wildlife for seasonal or daily migration. Habitat fragmentation involves the potential for dividing sensitive habitat and thereby lessening its biological value.

Habitat areas that have been designated as critical habitat under the Federal Endangered Species Act are discussed in Section 2.20. Wetlands and other waters are discussed in Section 2.17.

2.16.1 Affected Environment

Terrestrial Vegetation Communities

Access Alignments

The limits of the Access Road Alignment currently contain four terrestrial vegetation community/habitat types: urbanized/developed; non-native grassland; southern coast live oak riparian forest; and Diegan coastal sage scrub (**Figure 2.16-1** and **Figure 2.16-2**; **Table 2.16-1**).

TABLE 2.16-1
VEGETATION COMMUNITIES IN EACH ACCESS ALIGNMENT

Terrestrial Vegetation Community	Alt. 1 Reservation Road acres	Preferred Alternative - Alt. 2 Option 1 Daisy Dr. acres	Alt. 2 Option 2 Daisy Dr. acres	Alt. 2 Option 3 Daisy Dr. acres	Alt. 3 Melody Rd. acres
Non-native Grassland	0.95	0.43	0.82	0.07	4.68
Diegan Coastal Sage Scrub	0.05	0.00	0.00	0.00	0.00
Southern Coast Live Oak Riparian Forest	0.22	0.22	0.25	0.03	0.57
Urbanized/Developed (not a protected habitat type)	9.02	9.25	8.24	6.23	9.55
Total Acreage	10.24	9.79	9.31	6.33	14.80

Approximately 83% of the Access Road Alignment limits can be classified as urbanized/developed vegetation communities, meaning that the land has already been disturbed or converted from their original natural habitats, and is now either in ruderal state (disturbed and weedy), mowed, graded, or urbanized with the addition of asphalt pavement, landscaping, structures, and utilities. Vegetation within this habitat type consists primarily of nonnative weedy or invasive ruderal species (e.g. thistles, brome grasses) or ornamental plants lacking a consistent community structure. The urbanized / developed habitat type provides limited resources for wildlife. The disturbed and altered condition of these lands greatly reduces their habitat value and ability to sustain rare plants or diverse wildlife assemblages.

Approximately 14% of the Access Road Alignment limits is classified as non-native grassland, and consists of open fields of European pasture grasses and weedy forbs. These annual grasslands have replaced native vegetation communities of perennial bunchgrasses or coastal scrub. Grazing disturbances, rather than periodic wildfires, keep this plant community from undergoing successional changes to woodland or scrub. Plant species common in this community include European annual grasses such as oat (*Avena* spp.), bromes (*Bromus* spp.), barley (*Hordeum* spp.), and fescue (*Festuca* spp.), and forbs such as turkey mullein (*Eremocarpus setigerus*), yellow star thistle (*Centaurea solstitialis*), and black mustard (*Brassica nigra*). The conversion of native habitats to annual grasslands greatly reduces wildlife biodiversity and habitat value.

Approximately 2.5% of the Access Road Alignment limits is classified as southern coast live oak riparian forest. This vegetation community type runs north-south through the limits of the Access Road Alignments along the Willow Creek corridor, but is severely degraded from cattle grazing. The dominant canopy tree is coast live oak (*Quercus agrifolia*); other characteristic riparian trees include canyon live oak and Engelmann oaks (*Quercus chrysolepis*, *Q. engelmannii*), willows (e.g. *Salix gooddingii* and *S. lasiolepis*), cottonwood (*Populus fremontii*), walnut (*Juglans californica*), and non-native trees such as Eucalyptus. Understory vegetation is sparse, but includes elderberry (*Sambucus nigra*), blackberry (*Rubus armeniacus*), and poison oak (*Toxicodendron diversilobum*).

Approximately 0.5% of the Access Road Alignment limits is classified as Diegan coastal sage scrub vegetation community. Diegan coastal sage scrub is present within the limits of the Access Road Alignments primarily along the margins of the Proposed Project limits in one steeply sloped area on the east side of SR-94 across from Reservation Road. Diegan coastal sage scrub consists primarily of California sagebrush (*Artemisia californica*) and flat-top buckwheat (*Eriogonum fasciculatum*). Other common species in this habitat type are, mule-fat (*Baccharis salicifolia*), tumbleweed (*Salsola tragus*), white sage (*Salvia apiana*), and laurel-leaf sumac (*Malosma laurina*). Coastal sage scrub plant communities are adapted to wildfires and drought

conditions, and provide habitat for many different types of wildlife. Cattle grazing has severely degraded the coastal scrub vegetation community and reduced the native shrub cover and allowed non-native weedy species to establish. Degraded coastal sage scrub provides little habitat for wildlife.

Granitic outcrops in the Access Road Alignment limits provide refuge for rodents and other mammals, basking areas for reptiles, and perching areas for birds. These granitic outcrops are found primarily in the Melody Road Access Alignment on the 87-acre parcel.

Non-Access Road Intersection

The SR-94/Jamacha Boulevard Intersection Proposed Project limits consist entirely of pavement, as the proposed improvement consists solely of re-striping existing pavement and modification of the existing traffic signal.

The SR-94/Jamacha Road Intersection Proposed Project limits consist entirely of urbanized features (riprap and pavement), except for a small portion of an intermittent, channelized stream called "Jamacha Channel," which contains southern willow riparian scrub and some coastal and valley freshwater marsh vegetation communities (**Figure 2.16-3**); these aquatic vegetation communities are discussed in more detail in Section 2.17: Wetlands. The dominant canopy trees are willows (e.g. *Salix gooddingii* and *S. lucida*). Upstream and outside of the Proposed Project limits, other trees are present, such as cottonwood (*Populus fremontii*) and non-native trees such as Eucalyptus and pepper tree (*Schinus molle*) and ornamental palms. Understory vegetation consists primarily of poison oak (*Toxicodendron diversilobum*), willow saplings, and non-native forbs. The riparian habitat has been degraded by channelization and the armoring of banks with riprap. Where the gradient is flatter, in-stream wetlands have formed, and contain watercress (*Rorippa nasturtium-aquaticum*); reeds (*Juncus* spp.); sedges (*Cyperus* spp.) and various exotic/invasive hydrophytes. Jamacha Channel terminates in municipal storm sewer system, which eventually discharges to the Sweetwater River. Adjacent to, but outside of, the Proposed Project limits, the following vegetation communities are found: non-native grassland, Diegan coastal sage scrub, and southern coast live oak riparian forest.

The SR-94/ Steele Canyon Road Intersection Proposed Project limits consist entirely of pavement, buildings, and urbanized/developed vegetation communities.

The SR-94/Lyons Valley Road Intersection Proposed Project limits consist entirely of pavement, buildings, and urbanized/developed vegetation communities, except for the portion of the project limits that requires vegetation clearing for line-of-sight improvements. This portion of the project limits contains southern coast oak riparian forest. This riparian forest consists primarily of coast live oak and willows (e.g. *Salix gooddingii* and *S. lucida*), but also laurel sumac (Malosma laurina); California bay (*Umbellularia californica*); Brazilian pepper tree (*Schinus* sp.), Acacia tree (*Acacia* sp.), and olive (*Olea* sp.).

The SR-94/Lyons Valley Road Intersection Proposed Project limits consist primarily of ruderal/ urbanized vegetation communities with southern coast live oak riparian forest bordering the south side of SR-94 (**Figure 2.16-4**).

The SR-94/Maxfield Road Intersection Proposed Project limits consist primarily of ruderal/ urbanized vegetation communities, but remnants of Diegan coastal sage scrub occur on roadcuts and berms (**Figure 2.16-5**).

Wildlife Movement and Corridors

Wildlife movement corridors link remaining areas of functional wildlife habitat that are separated primarily by human developments or by natural barriers such as rugged terrain and abrupt changes in vegetation cover. Wilderness and open lands have been fragmented by urbanization, which can disrupt migratory species and separate interbreeding populations. Corridors allow migratory movements and act as links between these separated populations.

For this analysis, wildlife movement corridors were identified as such if they contained any of the following: an intact riparian corridor, or an otherwise unobstructed major drainage channel; an open space larger enough for ungulates and other large mammals to interbreed; and/or smaller open spaces that are connected to each other by unpaved roads or underpasses (bridges and large culverts). Urbanized areas of one city block or larger were considered to be movement barriers. Paved roads, including SR-94, were considered to be semi-permeable barriers that allowed some wildlife movement.

One limited wildlife corridor exists within the limits of the Access Road Alignments: the Willow Creek riparian corridor. Outside of the Proposed Project limits, several wildlife corridors exist, especially the Jamul Creek riparian corridor and the CDFW preserve areas (Rancho Jamul Ecological Reserve and Hollenbeck Canyon Wildlife Area). Busy roadways such as SR-94 and associated boundary fences create barriers to wildlife movement. Culverts under roads and bridges, such as the bridge at Melody Road, allow some wildlife movement under SR-94; thus, the Willow Creek riparian corridor within the Proposed Project limits functions to a limited extent as a wildlife corridor, but the corridor terminates abruptly with the urbanization associated with the town of Jamul.

No wildlife corridors exist within the Non-Access Road Intersection Proposed Project limits. Within the Proposed Project limits, Jamacha Channel does not function as a wildlife corridor because it terminates abruptly into a municipal storm sewer system. Outside of the Non-Access Road Intersection Proposed Project limits, several wildlife corridors exist: the Sweetwater River floodplain and its tributaries (including the Jamacha Channel upstream of the SR-94/Jamacha Road intersection); the Steele Canyon riparian corridor; the Proctor Valley drainage; and

undeveloped lands in the Jamul Mountains and San Miguel Mountains (including units of the San Diego National Wildlife Refuge complex).

2.16.2 Environmental Consequences

Impacts to Natural Communities

The Proposed Project limits are situated within two Plan Areas of the MSCP: the Metro-Lakeside-Jamul Segment and the South County Segment. Note that the SR-94 ROW component of the Proposed Project limits is not subject to the MSCP. MSCP designated areas are regulated under the authority of the County of San Diego in cooperation with the CDFW and the USFWS. All of the Non-Access Road Intersections Proposed Project limits are located within the MLJ Segment. The portions of the Access Alignments Proposed Project limits that are east of SR-94, and areas north of Melody Road, are in the Metro-Lakeside-Jamul Segment. Land within the limits of the access alignment is designated as “Minor Amendment Areas” or "Take-Authorized Areas." Portions of the access alignment limits west of SR-94, and south of Melody Road, are in the South County Segment. This segment is separated into three designations: Take-authorized Areas; Pre-Approved Mitigation Area; and Hardline Preserve.

Permanent impacts to natural communities from construction of the Proposed Project would occur from new grading and cut and fill, the extension or replacement of culverts and bridges, and general road widening and paving. Permanent impacts were quantified by summing the acreages of all ground disturbance areas using geographical information system software. Temporary impacts to natural communities from construction of the Proposed Project would occur in the 10-foot wide corridors that are adjacent to these ground disturbance areas; temporary impacts were quantified using the same method. Possible temporary impacts from construction of the Proposed Project include: the introduction of litter which could affect wildlife feeding and other behaviors; unauthorized trespass by workers and/or equipment, which could cause trampling of vegetation or stress wildlife; increases in soil erosion and sedimentation, and deposition of particulate matter via fugitive dust as well as equipment exhaust, all of which could degrade vegetation and habitat quality. Habitat disturbance and degradation could, in turn, facilitate the increased spread of invasive plant species.

Within take-authorized areas, projects must perform compensatory mitigation for the loss of natural habitats; this is dictated by mitigation ratios specified in the Biological Mitigation Ordinance (BMO), which vary from 0.5:1 to 3:1, either by an in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as areas on the 87-acre parcel that are designated hardline preserve or Pre-Approved Mitigation Area).

The mitigation ratio is determined in the BMO by the tier of the protected habitat type (according to the rarity of the habitat type): riparian habitat and oak woodland habitat are Tier 1; coastal

sage scrub is Tier 2: and non-native grassland is Tier 3. Areas lacking natural habitat (ruderal or urbanized areas) are Tier 4 and are not subject to the MSCP or the BMO. The mitigation ratio is increased if the project is within a Biological Resource Core area; for this Proposed Project, only the eastern portion of the 87-acre parcel has this designation, and thus is only applicable to the Melody Road Access Alignment. No portions of the Non-Access Road Intersection Proposed Project limits are designated as Biological Resource Core Areas. Lands that are designated as a Pre-Approved Mitigation Area or Hardline Preserve are generally very limited in their land uses because they are identified as areas of highest conservation value. Lands designated as Pre-Approved Mitigation Areas or Hardline Preserve are automatically designated as Biological Resource Core Areas.

Non-Access Road Intersections

Improvements to the SR-94/Jamacha Boulevard and SR-94/Steele Canyon Road Intersection Proposed Project limits involve work in areas that are paved, landscaped, or barren, and that have no natural habitat; thus Proposed Project improvements would not impact natural communities. Improvements to the SR-94/Jamacha Road Intersection Proposed Project limits would not impact terrestrial natural communities, but a small amount of aquatic habitat would be impacted, which is addressed in Section 2.17: Wetlands.

Improvements to the SR94/Lyons Valley Road Intersection Proposed Project limits would impact 0.1 acre of coast live oak riparian forest due to the need to clear vegetation for improved line-of-sight. Impacts to this natural community is reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Two small areas within the SR-94/Maxfield Road Intersection Proposed Project limits would be impacted (**Figure 2.16-5**). At this intersection, construction would impact approximately 0.69 acres of Diegan coastal sage scrub: 0.56 acres on the west side of SR-94 for sight distance improvements, and 0.13 acres on the east side of SR-94 for lane and shoulder widening. Impacts to these natural communities are reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Alternative 1: Reservation Road Access

The impacts for Alternatives 1: Reservation Road Access includes those described above for the Non-Access Road Intersections, as well as those below for the Reservation Road Access Alignment.

Construction of the Reservation Road Access Alignment would result in temporary impacts to 0.03 acres of Diegan coastal sage scrub, 0.06 acres of southern coast live oak riparian forest, and 0.48 acres of non-native grassland. Construction of Alternative 1: Reservation Road Access Alignment would result in permanent impacts to 0.22 acres of southern coast live oak riparian

forest, 0.05 acres of Diegan coastal sage scrub, and 0.95 acres of non-native grassland. Impacts to these natural communities are reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Alternative 2: Daisy Drive Access

Option 1 Full Footprint (Preferred Alternative)

The impacts for Alternatives 2: Daisy Drive Access; Option 1 includes those described above for the Non-Access Road Intersections, as well as those below for the Daisy Drive Access Alignment; Option 1.

Construction of Daisy Drive Access Alignment; Option 1 would result in 0.30 acres of temporary impacts to non-native grasslands and 0.02 acres of temporary impacts to southern coast live oak riparian forest. Permanent impacts under this Access Road Alignment would include 0.43 acres of non-native grassland and 0.11 acres of southern coast live oak riparian forest. Impacts to these natural communities are reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Option 2 Reduced Footprint

The impacts for Alternatives 2: Daisy Drive Access; Option 2 includes those described above for the Non-Access Road Intersections, as well as those below for the Daisy Drive Access Alignment; Option 2.

Construction of Daisy Drive Access Alignment; Option 2 would result in 0.52 acres of temporary impacts to non-native grasslands and 0.03 acres of temporary impacts to southern coast live oak riparian forest. Permanent impacts under this Access Road Alignment would include 0.82 acres of non-native grassland and 0.25 acres of southern coast live oak riparian forest. Impacts to these natural communities are reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Option 3 Minimum Footprint

The impacts for Alternatives 2: Daisy Drive Access; Option 3 includes those described above for the Non-Access Road Intersections, as well as those below for the Daisy Drive Access Alignment; Option 3.

Construction of Daisy Drive Access Alignment; Option 3 would result in 0.09 acres of temporary impacts to non-native grasslands and 0.06 acres of temporary impacts to southern coast live oak riparian forest. Permanent impacts under this Access Road Alignment would include 0.07 acres of non-native grassland and 0.03 acres of southern coast live oak riparian

forest. Impacts to these natural communities are reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Alternative 3: Melody Road Access

The impacts for Alternatives 3: Melody Road Access includes those described above for the Non-Access Road Intersections, as well as those below for the Melody Road Access Alignment.

Construction of the Melody Road Access Alignment would result in 1.68 acres of temporary impacts to non-native grasslands and 0.14 acres of temporary impacts to southern coast live oak riparian forest. Permanent impacts under this Access Road Alignment would include 4.68 acres of non-native grassland and 0.57 acres of southern coast live oak riparian forest. Impacts to these natural communities are reduced to a less-than-significant level with avoidance, minimization and/or mitigation measures listed in Section 2.16.3.

Alternative 4: No Project Alternative

No ground-disturbing activities or physical improvements to SR-94 or the study intersections would occur with Alternative 4: No Project Alternative; therefore, no impacts to natural communities would result.

Impacts to Wildlife Corridors

For this impact analysis, a wildlife movement corridor would be considered adversely affected by the Proposed Project if any of the following occurred: the erection of extensive walls or fences that created barriers to movement; the installation of a new road or the upgrading of a dirt road to a paved road; or a major division or loss of open space.

Non-Access Road Intersections

Improvements to the SR-94/Jamacha Boulevard, SR-94/Lyons Valley Road, SR-94/Steele Canyon Road, and SR-94/Jamacha Road Intersection Proposed Project limits involve work in areas that are paved, landscaped, or barren. Land within the Proposed Project limits does not function as wildlife corridors; thus, Proposed Project improvements for these intersections would not impact wildlife movement.

No wildlife movement impacts were identified for the SR-94/Maxfield Road intersection improvements; the new retaining wall would not disrupt any known wildlife movement corridor, and the wall would discourage animals from entering the ROW.

Alternative 1: Reservation Road Access and Alternative 2: Daisy Drive Access (Options 1-3)

The impacts for Alternative 1 and 2 include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Construction of the proposed improvements would not involve the erection of major amounts of fencing, walls, or other wildlife barriers. Retaining walls would be installed at the SR-94/ /Melody Road intersection and alongside of SR-94 south of Melody Road, which would replace existing barbed wire fencing, chain-link fencing, and/or armored slopes (i.e., rip-rap). The erection of these retaining walls is seen as a beneficial impact because the walls would deter animals from entering busy roadways, which is a potential source of mortality. The retaining walls would encourage wildlife to stay in the stream corridors or cross underneath existing culverts and bridges. The use of retaining walls also reduces the Proposed Project footprint as compared to the use of cut-and-fill slopes, and thus reduces Proposed Project-related habitat loss. Construction of the Reservation Road Access Alignment would necessitate the enlargement of pipe culverts under SR-94, and would require the replacement of the concrete pipe culvert under Melody Road with a bottomless culvert. These implemented Proposed Project features would maintain or increase the heights of current under-road passageways for animals; this would result in the maintenance or increase in the size of wildlife corridors within the Proposed Project limits. Thus, construction of the Reservation Road and Daisy Drive Access Alignments would not result in impacts to wildlife movement or corridors because no new barriers or roads would be constructed.

Alternative 3: Melody Road Access

The impacts for Alternative 3: Melody Road Access include those described above for the Non-Access Road Intersections, as well as those below for the Melody Road Access Alignment.

Construction of the Melody Road Access Alignment would require the construction of a new road in a sensitive area designated as Hardline Preserve in the San Diego County MSCP, which would cause habitat fragmentation and restrict wildlife movement and reduce the utility of Willow Creek as a wildlife corridor. This is considered a significant and unavoidable impact.

Alternative 4: No Project Alternative

No ground-disturbing activities or physical improvements to SR-94 or the study intersections would occur with Alternative 4: No Project Alternative; therefore, no impacts relating to wildlife movement would result.

2.16.3 Avoidance, Minimization and/or Mitigation Measures

The following measures are identified to reduce all Natural Community impacts to a less-than-significant level, with one exception. The Wildlife Corridor Impact for Alternative 3: Melody Road Access is a significant unavoidable impact.

These following measures reduce impacts to insignificant levels because they result in a net conservation benefit. First, project impacts were reduced by designing the Alternatives 1-3 Build Alternatives to have the smallest ecological impacts while still achieving project goals. Secondly, implementation of these identified avoidance measures will ensure that construction impacts will be minimized through worker environmental awareness training, biological monitoring, fencing of sensitive areas, and habitat restoration. Finally, and most importantly, permanent habitat loss will be compensated by the purchase of greater amounts of preserve lands at mitigation ratios ranging from 1:1 to 6:1. Such preserve purchases, guided by the MSCP, are advantageous because they allow new development to occur near areas already urbanized, and allow existing preserves to be expanded and consolidated, or high-value private lands to be converted to publicly-held preserves.

Natural Communities: Temporary Impacts

The following measures were identified for Alternatives 1-3: Build Alternatives to reduce the temporary significant impacts of habitat degradation on natural communities to a less-than-significant level:

(1) All areas experiencing temporary impacts from construction activities would be restored to their original condition. Restoration would include, as necessary, re-establishing the existing contours and replacement of lost topsoil, soil aeration, replanting with identical native vegetation and supplemental watering and weed maintenance to ensure native plant re-establishment.

(2) All cut-and-fill slopes would be revegetated with native vegetation. These slopes would have temporary irrigation and be planted with native container plants and seeds of similar composition as the adjacent natural habitats. All vegetation would be monitored and maintained on these slopes to ensure successful establishment and control invasive weeds. Vegetation restoration implementation and monitoring will conform to the County's Land Use and Environment Group guidelines for revegetation plans.

(3) To avoid incidental loss of adjacent sensitive habitat types during construction activities, environmentally sensitive area (ESA) fencing would be installed along the limits of the Proposed Project prior to the start of construction, and construction activities would not

occur beyond this fencing. Construction crews would be made fully aware of this boundary and would be instructed to avoid these environmentally sensitive areas.

Natural Communities: Permanent Impacts

The following compensatory mitigation measures were identified for SR-94/Lyons Valley Road, SR-94/Maxfield Road and the Access Road Alignments to reduce the significant impacts of habitat loss on natural communities to a less-than-significant level:

(1) SR-94/Lyons Valley Road Intersection: The land preservation requirements are 0.2 acre of coast live oak riparian forest, which the applicant would fulfill either by an in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as areas on the 87-acre parcel that are designated hardline preserve).

(2) SR-94/Maxfield Road Intersection: The land preservation requirements are 1.4 acres of Diegan coastal sage scrub, which the applicant would fulfill either by an in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as areas on the 87-acre parcel that are designated hardline preserve).

(3) Alternative 1: Reservation Road Access Alignment: The applicant would comply with the land preservation requirements of 1.43 acres of grassland, 0.10 acres of coastal sage scrub, and 0.66 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (1.80 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 5.40 acres of new preserve lands. To develop the 0.41 acres of land that has the MSCP designation of "Hardline" Preserve, the County would need to approve a boundary line adjustment of the MSCP plan area. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.

(4) Alternative 2; Option 1 Full Footprint: The applicant would comply with the land preservation requirements of 0.65 acres of grassland and 0.33 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (1.06 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 3.18 acres of new preserve lands. To develop the 0.28 acres of land that has the MSCP designation of "Hardline" Preserve and 0.18 acres that is designated a Pre-Approved Mitigation Area, the County

would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.

(5) Alternative 2; Option 2 Reduced Footprint: The applicant would comply with the land preservation requirements of 1.23 acres of grassland and 0.75 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (1.04 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 3.12 acres of new preserve lands. To develop the 0.05 acres of land that has the MSCP designation of "Hardline" Preserve and 0.49 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.

(6) Alternative 2; Option 3 Minimum Footprint: The applicant would comply with the land preservation requirements of 0.11 acres of grassland and 0.09 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (0.08 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 0.24 acres of new preserve lands. To develop the 0.02 acres of land that has the MSCP designation of "Hardline" Preserve and 0.06 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.

(7) Alternative 3: Melody Road Access Alignment: The applicant would comply with the land preservation requirements of 7.02 acres of grassland and 1.71 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (0.83 acres of non-native grassland and urbanized / developed habitat) would require approval from CDFW and the dedication of 2.49 acres of new preserve lands. To develop the 3.75 acres of land that has the MSCP designation of "Hardline" Preserve and 1.05 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other

portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.

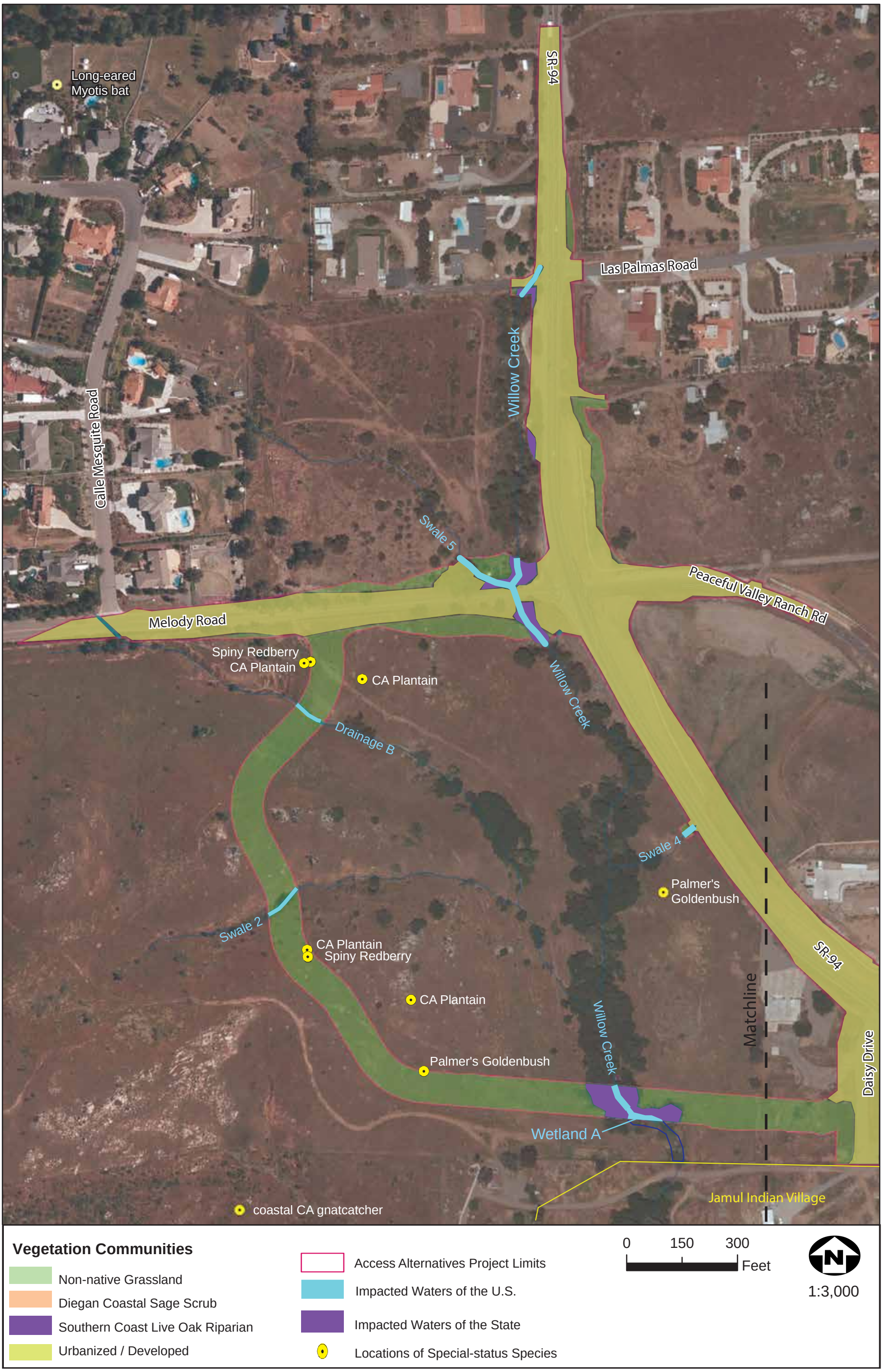


Figure 2.16-1
Vegetation Communities and Jurisdictional Waters in the Access Alternatives Project Limits (Northern Half)

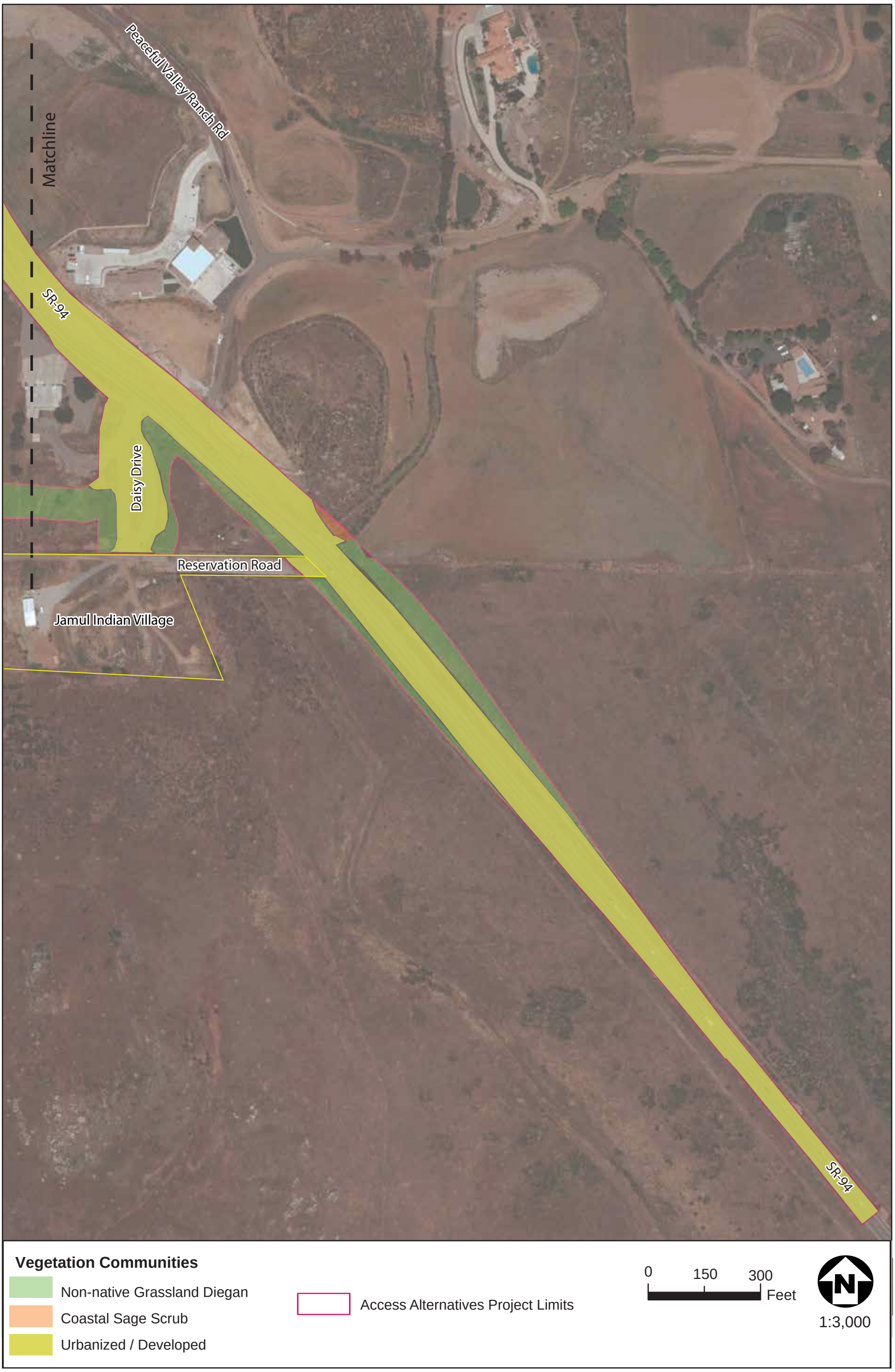


Figure 2.16-2
Vegetation Communities and Jurisdictional Waters in the Access Alternatives Project Limits (Southern Half)

Figure 2.16-3
Vegetation Communities and Jurisdictional Waters in the SR-94 / Jamacha Rd. Intersection Project Limits

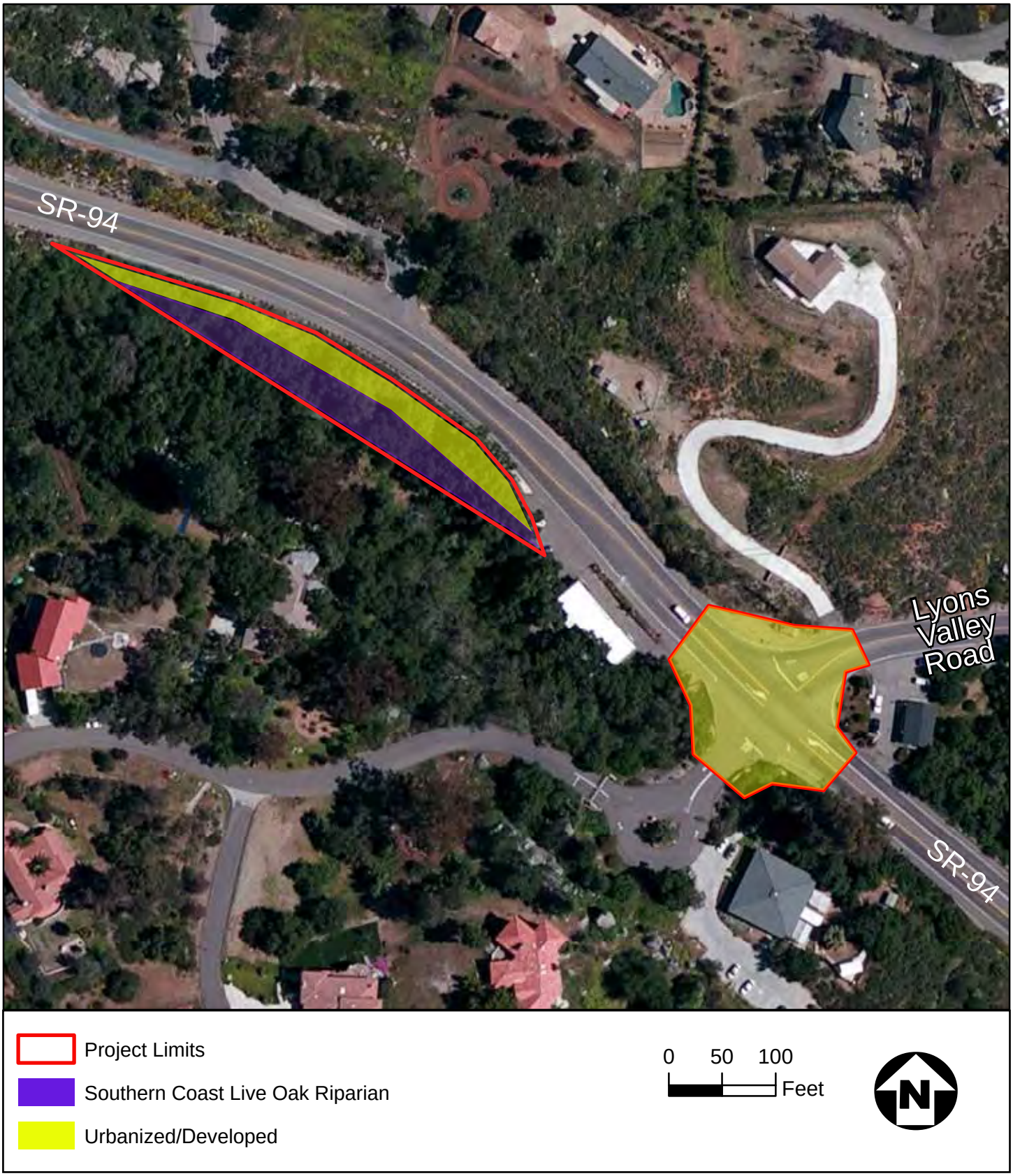


Figure 2.16-4
Vegetation Communities in the SR-94/Lyons Valley Rd. Intersection Project Limits

Figure 2.16-5
Vegetation Communities in the SR-94/Maxfield Rd. Intersection Project Limits

2.17 WETLANDS AND OTHER WATERS

2.17.1 Regulatory Setting

Wetlands and other waters are protected under a number of laws and regulations. At the federal level, the Federal Water Pollution Control Act, more commonly referred to as the Clean Water Act (CWA) (33 United States Code [USC] 1344), is the primary law regulating wetlands and surface waters. One purpose of the CWA is to regulate the discharge of dredged or fill material into waters of the U.S., including wetlands. Waters of the U.S. include navigable waters, interstate waters, territorial seas and other waters that may be used in interstate or foreign commerce. To classify wetlands for the purposes of the CWA, a three-parameter approach is used that includes the presence of hydrophytic (water-loving) vegetation, wetland hydrology, and hydric soils (soils formed during saturation/inundation). All three parameters must be present, under normal circumstances, for an area to be designated as a jurisdictional wetland under the CWA.

Section 404 of the CWA establishes a regulatory program that provides that discharge of dredged or fill material cannot be permitted if a practicable alternative exists that is less damaging to the aquatic environment or if the nation's waters would be significantly degraded. The Section 404 permit program is run by the USACE with oversight by the USEPA.

The USACE issues two types of 404 permits: General and Standard permits. There are two types of General permits: Regional permits and Nationwide permits. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Ordinarily, projects that do not meet the criteria for a Nationwide Permit may be permitted under one of USACE's Standard permits. There are two types of Standard permits: Individual permits and Letters of Permission. For Standard permits, the USACE decision to approve is based on compliance with USEPA's Section 404(b) (1) Guidelines (USEPA 40 Code of Federal Regulations [CFR] Part 230), and whether permit approval is in the public interest. The 404 (b) (1) Guidelines (Guidelines) were developed by the USEPA in conjunction with the USACE, and allow the discharge of dredged or fill material into the aquatic system (waters of the U.S.) only if there is no practicable alternative which would have less adverse effects. The Guidelines state that the USACE may not issue a permit if there is a least environmentally damaging practicable alternative (LEDPA) to the proposed discharge that would have lesser effects on waters of the U.S., and not have any other significant adverse environmental consequences.

The Executive Order for the Protection of Wetlands (EO 11990) also regulates the activities of federal agencies with regard to wetlands. Essentially, this EO states that a federal agency, such as the FHWA and/or Caltrans, as assigned, cannot undertake or provide assistance for new

construction located in wetlands unless the head of the agency finds: 1) that there is no practicable alternative to the construction and 2) the proposed project includes all practicable measures to minimize harm.

At the state level, wetlands and waters are regulated primarily by the SWRCB, the RWQCB and CDFW. In certain circumstances, the Coastal Commission (or Bay Conservation and Development Commission or the Tahoe Regional Planning Agency) may also be involved. Sections 1600-1607 of the California Fish and Game Code require any agency that proposes a project that would substantially divert or obstruct the natural flow of or substantially change the bed or bank of a river, stream, or lake to notify CDFW before beginning construction. If CDFW determines that the project may substantially and adversely affect fish or wildlife resources, a Lake or Streambed Alteration Agreement would be required. CDFW jurisdictional limits are usually defined by the tops of the stream or lake banks, or the outer edge of riparian vegetation, whichever is wider. Wetlands under jurisdiction of the USACE may or may not be included in the area covered by a Streambed Alteration Agreement obtained from the CDFW.

The RWQCBs were established under the Porter-Cologne Water Quality Control Act to oversee water quality. Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements (WDRs) and may be required even when the discharge is already permitted or exempt under the CWA. In compliance with Section 401 of the CWA, the RWQCBs also issue water quality certifications for activities which may result in a discharge to waters of the U.S. This is most frequently required in tandem with a Section 404 permit request. Please see Section 2.09: Water Quality for more details.

2.17.2 Affected Environment

Resource Agency Consultation

Consultation with USACE on the Proposed Project began in the fall of 2011, and has continued to the end of 2014. A formal delineation of waters of the U.S. and waters of the State within the limits of the Access Road Alignments was conducted in the fall of 2011; field verification was performed by USACE on November 1, 2011. Subsequently, USACE issued a Preliminary Jurisdictional Determination in August 1, 2013, in which all drainage features having evidence of an Ordinary High Water Mark would be considered subject to federal jurisdiction for purposes of assessing impacts and mitigation related to the Proposed Project. A formal delineation of waters of the U.S. and waters of the State within the limits of the Non-Access Road Intersections was conducted in December 2013; subsequently, USACE issued a Preliminary Jurisdictional Determination on August 11, 2014. The following permits would be required for this Proposed Project:

- CWA Section 404 Nationwide Permit for fill of waters of the US (to extend culverts under SR-94 and under Melody Road and to build a retaining wall at SR-94 / Jamacha Rd.)

- CWA Section 401 Water Quality Certification by the RWQCB, which is required concurrently with issuance of a Section 404 permit

- Fish and Game Code Section 1602 Streambed Alteration Agreement for fill of waters of the State and impacts to riparian vegetation (to extend culverts under SR-94 and under Melody Road and to build a retaining wall at SR-94 / Jamacha Rd.).

Water Resources Under Federal Jurisdiction

Under the Preliminary Jurisdictional Determinations, the following water features are subject to USACE jurisdiction under the CWA within the limits of the Access Road Alignments: the Willow Creek channel ("Drainage A") and in stream wetlands (Wetland A and B); and ephemeral tributaries to Willow Creek (Drainage B, Swales 2, 3, 3B, 4, 4B, and 5) (**Figure 2.14-1**). No vernal pools or other isolated wetlands were detected within the limits of the Access Road Alignments.

Willow Creek is a tributary of Jamul Creek, and runs approximately 2,500 feet within the limits of the Access Road Alignments and has an average channel width of about 4 feet (range of 2 to 20 feet). Within the limits of the Access Road Alignments, the lower portions of Willow Creek flow seasonally from both surface runoff and the discharge of several springs. Within the limits of the Access Road Alignments, the Willow Creek drainage is high gradient and scouring has removed much of the in-channel and riparian vegetation. Wetland A and B are riverine marshes located within the ordinary high water mark of Willow Creek and completely within the 87-acre parcel. These features are severely degraded from use by cattle. Some of these in-stream wetlands contain the Southern Riparian Willow Scrub vegetation community, which consists of dense, winter-deciduous riparian thickets dominated by willows (*Salix gooddingii, S. hindsiana, S. lasiolepis, S. laevigata*). The canopy is dense and closed, and does not allow much understory to form. The tributaries of Willow Creek (Drainage B, Swales 2, 3, 3B, 4, 4B, 5) are ephemeral channels that are deeply incised from unchecked erosion. These features transmit water only after rain events.

No water features occur in the following limits of the Non-Access Road Intersections: SR-94/ Jamacha Blvd. Intersection; SR-94/Steele Canyon Rd. Intersection; SR-94/Lyons Valley Rd. Intersection; and SR-94/Maxfield Rd. Intersection. In the SR-94/Jamacha Road Intersection Proposed Project limits, there is one water feature that is subject to USACE jurisdiction under the CWA: an intermittent stream named "Jamacha Channel" and its associated in-stream wetlands (**Figure 2.14-3**). Within the Proposed Project limits, the intermittent stream varies in

channel width between 3 and 35 feet, with an average width of about 10 feet along the linear 700 feet (7,000 square feet). The intermittent stream is directed into a concrete box culvert, where it flows underground until it discharges to the Sweetwater River. The stream is degraded from channelization, including the placement of riprap along the banks, invasive species, and other urbanization effects. A marsh is located within the channel of this intermittent stream, measuring approximately 20 feet average width by 100 feet (2,000 square feet); the dominant vegetation community is Southern Riparian Willow Scrub.

Water Resources Under State Jurisdiction

CDFW jurisdiction extends to the limits of the riparian canopy, or from the top of a bank on one side of a stream to the top of the opposite bank, whichever is wider. A formal delineation of waters of the State was conducted in 2011 and 2013 concurrently with the delineation of waters of the U.S. All of the channels and wetlands identified in the USACE Preliminary Jurisdictional Determination were determined to be subject to State jurisdiction under the Porter-Cologne Act: the Willow Creek channel and in stream wetlands (Wetland A and B); and ephemeral tributaries to Willow Creek (Drainage B, Swales 2, 3, 3B, 4, 4B, 5). Under Fish and Game Code (Section 1600 et seq.), the Stream Zones of Willow Creek and its tributary "Drainage B", defined as the limits of canopy of southern coast live oak riparian forest, are also protected (**Figure 2.14-1**).

Jamacha Channel at the SR-94/Jamacha Road Intersection Proposed Project limits is also subject to State jurisdiction under the Porter-Cologne Act. This water of the State extends slightly beyond the federally-jurisdictional channel to the outside extent of riparian vegetation (**Figure 2.16-3**).

2.17.3 Environmental Consequences

Construction of the proposed Alternatives could result in adverse direct impacts to water resources by modification or destruction of stream channels, banks, and/or riparian vegetation, by the placement of fill within a channel, or by increased erosion and sedimentation in receiving water bodies due to soil disturbance.

Water Resources

Non-Access Road Intersections

Because no water features exist in the Proposed Project limits, the SR-94/Jamacha Boulevard Intersection, the SR-94/Steele Canyon Road Intersection, and the SR-94/Maxfield Road Intersection would not impact waters of the U.S. or waters of the State.

At SR-94/Jamacha Road Intersection, impacts to jurisdictional waters would occur from installation of the new retaining wall, which involves excavation and casting of concrete footers

and removal of the existing rip-rap, and associated temporary construction impacts. The impacts estimated for waters of the US and waters of the State are: 0.00007 acres of permanent impacts and 0.03 acres of temporary impacts to Jamacha Channel (**Figure 2.14-3**). No riparian vegetation would need to be removed, although branches of willow trees may need to be trimmed. Vegetation trimming could result in up to 0.05 acres of temporary impacts to southern willow scrub. The impact to the Jamacha Channel is considered a significant impact. The avoidance, minimization and/or mitigation measures listed in Section 2.17.4 would reduce the impact to a less-than-significant level.

At SR-94/Lyons Valley Road Intersection, impacts to waters of the State would occur from trimming of riparian vegetation, because waters of the State extend to the outer edge of riparian vegetation. The impacts are estimated at 0.1 acre waters of the State. The avoidance, minimization and/or mitigation measures listed in Section 2.17.4 would reduce the impact to a less-than-significant level.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Construction of any of the Access Road Alignments would require the placement of fill or structures in Willow Creek to extend the culvert bridge at Melody Road. The exception is Alternative 2: Option 1, which will employ a bottomless culvert at Melody Road; this will avoid placing any new fill in the Willow Creek channel. In addition, Alternative 3: Melody Road Access would require three new channel crossings on the 87-acre parcel to build the new access road. Development within the Proposed Project limits, such as road widening, grading, or the construction of new roadbeds, would require the permanent placement of fill or structures or other alterations to these protected channels, or the clearing of riparian vegetation. The estimated acreages of impact are shown in **Table 2.17-1**. Construction activities could also impact channels by increasing erosion or sedimentation in receiving water bodies due to soil disturbance. The placement of fill into Willow Creek and riparian habitat is considered a significant impact. The avoidance, minimization and/or mitigation measures listed in Section 2.17.4 would reduce the impact to a less-than-significant level.

TABLE 2.17-1
IMPACTS TO JURISDICTIONAL WATERS WITHIN THE ACCESS ROAD ALIGNMENTS PROPOSED PROJECT LIMITS

	Alt. 1 Acres	Preferred Alternative Alt. 2 Opt. 1 Acres	Alt. 2 Opt. 2 Acres	Alt. 2 Opt. 3 Acres	Alt. 3 Acres
Waters of the U.S.					
Permanent Impacts					
Channels	0.05	0	0.05	0.02	0.10
Wetlands	0.00	0.00	0.00	0.00	0.00
Totals	0.05	0	0.05	0.02	0.10
Temporary Impacts					
Channels	0.01	0.01	0.01	0.01	0.02
Wetlands	0.00	0.00	0.00	0.00	0.00
Totals	0.01	0.01	0.01	0.01	0.02
Waters of the State					
Permanent Impacts					
Channels	0.05	0	0.05	0.02	0.10
Riparian vegetation	0.22	0.11	0.25	0.03	0.57
Wetlands	0.00	0.00	0.00	0.00	0.00
Totals	0.27	0.11	0.30	0.05	0.67
Temporary Impacts					
Channels	0.01	0.01	0.01	0.01	0.02
Riparian vegetation	0.06	0.06	0.03	0.06	0.14
Wetlands	0.00	0.00	0.00	0.00	0.00
Totals	0.07	0.07	0.04	0.07	0.16

Alternative 4: No Project Alternative

No ground-disturbing activities or physical improvements to SR-94 or the study intersections would occur from Alternative 4: No Project Alternative; therefore, no impacts to waters of the U.S. or waters of the State would result.

2.17.4 Avoidance, Minimization and/or Mitigation Measures

Water Resources

The following measures would reduce the temporary and permanent jurisdictional water impacts from proposed improvements at SR-94/Jamacha Road and the Access Road Alignments to a less-than-significant level.

The measures below reduce impacts to insignificant levels because they result in no net loss to water resources. First, project impacts were reduced by designing the Alternatives 1-3 Build Alternatives to have the smallest ecological impacts while still achieving project goals. Secondly, implementation of these identified avoidance measures will ensure that construction impacts will be minimized through worker environmental awareness training, biological monitoring, fencing of sensitive areas, and habitat restoration. Finally, and most importantly, the small amount of permanent jurisdictional water resource loss from project implementation (at SR-94 / Jamacha Rd. Intersection) will be offset by the larger amount of restoration of stream channel and riparian habitat at SR-94 / Melody Road Intersection via the removal of the culvert and fill in the Willow Creek channel and the construction of a new bridge that will span the stream corridor. Implementation of the Project would result in a net gain of jurisdictional channel. For impacts to riparian habitats that are outside of the channels, permanent habitat loss would be compensated by the purchase of greater amounts of preserve lands at mitigation ratios ranging from 3:1 to 6:1. Such preserve purchases, guided by the MSCP, are advantageous because they allow new development to occur near areas already urbanized, and allow existing preserves to be expanded and consolidated, or high-value private lands to be converted to publicly-held preserves.

(1) For improvements to the SR-94/Jamacha Road Intersection, the land preservation/restoration requirement for loss of 0.03 acres of channel, at the 3:1 ratio specified in the Biological Mitigation Ordinance, is 0.09 acres. However, the SR-94/Jamacha Road Intersection Proposed Project limits are located within two overlapping County mitigation areas (**Figure 2.14-3**): a wetland enhancement area and a least Bell's vireo habitat enhancement area. The compensation ratio is doubled for impacts occurring within existing mitigation areas. Thus, the applicant would comply with the land preservation requirements of 0.18 acres.

(2) For improvements to the SR-94/Lyons Valley Road Intersection, the land preservation/restoration requirement for loss of 0.1 acre of riparian habitat, at the 2:1 ratio specified in the Biological Mitigation Ordinance, is 0.2 acre.

(3) For implementation of Alternative 1, Alternative 2 Option 2, Alternative 2 Option 3, or Alternative 3, the land preservation/restoration requirements for loss of 0.20 to 0.10 acre of channel, is 0.06 to 0.3 acre. The land preservation/restoration requirement for loss of 0.03 to 0.57 acre of riparian habitat is 0.06 to 1.14 acre.

(4) For implementation of the Alternative 2 Option 1, the land preservation/restoration requirement for loss of 0.11 acre of riparian habitat is 0.22 acre. In order to avoid all permanent impacts to the Willow Creek channel at Melody Road, the existing culvert and other fill would be removed and replaced with a bottom-less culvert that does not require

any fill or foundations within the channel. This would result in a net gain of waters of the US and waters of the State. No land preservation/restoration requirements are required for the Willow Creek channel because no permanent impacts would occur.

(5) Create a habitat restoration plan and implement habitat restoration for temporary impacts to riparian vegetation and stream channels at Jamacha Channel (SR-94/Jamacha Road Intersection) and at Willow Creek (Access Road Alignments). The restoration will obligate the applicant to take the following restoration actions: (a) native riparian plants would be planted; and (b) those plants would be actively maintained for 3 years to ensure successful establishment and control invasive weeds.

(6) Implement measures specified in Section 2.16.3 to restore any habitat disturbed by construction activities.

(7) Obtain the following permits to install a retaining wall at Jamacha Channel (SR-94/Jamacha Road Intersection) and to install retaining walls and a bottomless culvert at Willow Creek under Melody Road (Access Road Alignments):

- CWA Section 404 Nationwide Permit from USACE,
- Section 401 Water Quality Certification from the RWQCB, and
- Fish and Game Code Section 1602 Streambed Alteration Agreement from CDFW.

(8) Implement measures specified in Section 2.9.4 Water Quality and Stormwater Runoff to protect water quality, including construction BMPs, soil stabilization measures, and site design BMPs, post-construction treatment control stormwater management BMPs.

(9) Enroll in the State Water Quality Control Board's Construction General Permit, which requires the preparation and proper implementation of a SWPPP, Hazardous Materials Management and Spill Response Plan, and related BMPs to protect water quality.

2.18 PLANT SPECIES

2.18.1 Regulatory Setting

The USFWS and CDFW have regulatory responsibility for the protection of special-status plant species. “Special-status” species are selected for protection because they are rare and/or subject to population and habitat declines. Special status is a general term for species that are provided varying levels of regulatory protection. The highest level of protection is given to threatened and endangered species; these are species that are formally listed or proposed for listing as endangered or threatened under the Federal Endangered Species Act (FESA) and/or the California Endangered Species Act (CESA). Please see the Threatened and Endangered Species Section 2.120 in this document for detailed information about these species.

This section of the document discusses all the other special-status plant species, including CDFW species of special concern, USFWS candidate species, and California Native Plant Society (CNPS) rare and endangered plants.

The regulatory requirements for FESA can be found at 16 United States Code (USC) Section 1531, et seq. See also 50 Code of Federal Regulations (CFR) Part 402. The regulatory requirements for CESA can be found at California Fish and Game Code, Section 2050, et seq. Caltrans projects are also subject to the Native Plant Protection Act, found at Fish and Game Code, Section 1900-1913, and the California Environmental Quality Act, CA Public Resources Code, Sections 2100-21177.

2.18.2 Affected Environment

Vegetation communities occurring within the Proposed Project limits are described in Section 2.16. To determine whether any special-status plant species might currently occur, or have historically occurred, within the Proposed Project limits and general vicinity, the following databases were queried: the California Natural Diversity Database (CNDDB), the San Diego County SANBIOS database, and the California Native Plant Society (CNPS) database. As well, a list of any endangered species and critical habitat occurring within a 10-mile radius of the Proposed Project limits was acquired from USFWS (**Appendix I**). No special-status plants were reported by these databases within the Proposed Project limits. Their general absence within the Proposed Project limits is likely due to the fact that the majority of land is urbanized or developed, or have degraded habitats due to the spread of exotic species and intensive land use practices, such as cattle grazing.

Botanical surveys of the Proposed Project limits were conducted in March, April, and June 2013. Only one special-status plant species was detected within the limits of the Non-Access Road Intersections: Palmer’s goldenbush (*Ericameria palmeri* var. *palmeri*). Palmer's goldenbush is ranked rare (1B.1) by CNPS, is designated a State Species of Concern, and is a Covered Species

under the MSCP (designated as Group B species and "Narrow Endemic Plant Species within the MSCP Subarea"). The California Department of Fish and Wildlife (CDFW) provided comments on the Draft EIR indicating that several stands (approximately 2,250 square feet) of Palmer's goldenbush were recently discovered within the SR-94/Jamacha Road Intersection Improvement area. No special-status plant species were detected within the limits of the Access Road Alignments for Alternatives 1-2. One special-status plant species was detected within the limits of the Melody Road Access Alignment: one stand of approximately 24 square feet of Palmer's goldenbush occurs within the Alternative 3: Melody Road Access Alignment Proposed Project limits in the overgrazed non-native grassland habitat (**Figure 2.16-1**). Palmer's goldenbush was not detected in the other Proposed Project limits.

2.18.3 Environmental Consequences

Special Status Plant Species

Non-Access Road Intersections

Botanical surveys were conducted for special-status plant species that occur in the vicinity, such as San Diego sagewort (*Artemisia palmeri*), Otay tarplant (*Deinandra conjugens*), Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*), Palmer's grapplinghook (*Harpagonella palmeri*); Ramona horkelia (*Horkelia truncata*), decumbent goldenbush (*Isocoma menziesii* var. *decumbens*), Gander's pitcher sage (*Lepechinia ganderi*), Robinson's peppergrass (*Lepidium virginicum* var. *robinsonii*), felt-leaved monardella (*Monardella hypoleuca lanata*), and Munz's sage (*Salvia munzii*). However, no special status plant species were detected within any of the Non-Access Road Intersection Proposed Project limits other than one stand of Palmer's goldenbush in the SR-94/Jamacha Road intersection improvement area. The avoidance, minimization and/or mitigation measures listed in Section 2.18.4 would reduce the impact to a less-than-significant level. No impacts to sensitive plant species were identified from construction of any of the other intersection improvements.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

No special status plant species were detected within the Access Road Alignment limits for Alternatives 1-2; therefore, no impact would result from the construction of these access alignments. Approximately 24-square feet of Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) on the 87-acre parcel would be impacted by construction of the Melody Road Access Alignment. This is considered a significant impact. The avoidance, minimization and/or

mitigation measures listed in Section 2.18.4 would reduce the impact to a less-than-significant level.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impact to special status plant species would result.

2.18.4 Avoidance, Minimization and/or Mitigation Measures

Special Status Plant Species

The following measures reduce impacts to sensitive plant species to insignificant levels because they result in a net conservation benefit. First, project impacts were reduced by designing the Alternatives 1-3 Build Alternatives to have the smallest ecological impacts while still achieving project goals. Secondly, implementation of these identified avoidance measures ensure that construction impacts would be minimized through transplantation of the identified stands of sensitive plants, worker environmental awareness training, biological monitoring, fencing of sensitive areas, and habitat restoration. Finally, and most importantly, permanent habitat loss would be compensated by the purchase of greater amounts of preserve lands at a 3:1 mitigation ratio. Such preserve purchases, guided by the MSCP, are advantageous because they allow new development to occur near areas already urbanized, and allow existing preserves to be expanded and consolidated, or high-value private lands to be converted to publicly-held preserves.

The following measure would reduce the significant impact to Palmer's goldenbush for the SR 94/Jamacha Road intersection improvement to a less-than-significant level:

(1) Using a 3:1 mitigation ratio as specified in the BMO, and after securing approval of the San Diego County Director of Planning and Development Services, 6,750 square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as on the 87-acre parcel). All stands of Palmer's goldenbush would be transplanted to this preserve area prior to the start of construction of the SR 94/Jamacha Road Intersection improvement. The relocated goldenbush would be monitored and maintained for 3 years to ensure successful re-establishment and to control invasive weeds.

The following measure would reduce the significant impact to Palmer's goldenbush for the Melody Road Access Alignment to a less-than-significant level:

(2) Using a 3:1 mitigation ratio as specified in the BMO, and after securing approval of the San Diego County Director of Planning and Development Services, 72 square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank (such as

the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as on the 87-acre parcel). All stands of Palmer's goldenbush would be transplanted to this preserve area prior to the start of construction of the Melody Road Access Road Alignment. The relocated goldenbush would be monitored and maintained for 3 years to ensure successful re-establishment and to control invasive weeds.

2.19 ANIMAL SPECIES

2.19.1 Regulatory Setting

Many state and federal laws regulate impacts to wildlife. The USFWS, the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries Service) and CDFW are responsible for implementing these laws. This section discusses potential impacts and permit requirements associated with animals not listed or proposed for listing under the federal or state Endangered Species Act. Species listed or proposed for listing as threatened or endangered are discussed in Section 2.20. All other special-status animal species are discussed here, including CDFW fully protected species and species of special concern, and USFWS or NOAA Fisheries Service candidate species.

Federal laws and regulations relevant to wildlife include the following:

- Migratory Bird Treaty Act
- Fish and Wildlife Coordination Act

State laws and regulations relevant to wildlife include the following:

- California Environmental Quality Act
- Sections 1600 – 1603 of the California Fish and Game Code
- Sections 4150 and 4152 of the California Fish and Game Code

2.19.2 Affected Environment

Special-status Animal Species

To determine whether any special-status animal species might currently occur, or have historically occurred, within the Proposed Project limits and general vicinity, the following databases were queried: the CNDDB; and the San Diego County SANBIOS database. As well, a list of any endangered species and critical habitat occurring within a 10-mile radius of the Proposed Project limits was acquired from USFWS (**Appendix I**). No special-status animals were reported by these databases within the Proposed Project limits. Their general absence within the Proposed Project limits is likely due to the fact that the majority of land within the Proposed Project limits are urbanized or developed, or have degraded habitats due to the spread of exotic species and intensive land use practices, such as cattle grazing.

Wildlife surveys were performed in May, August, and November of 2013, and January, May, and August of 2014. None of the wildlife surveys detected any special-status animal species.

Lighting and Noise

Existing light sources within the Proposed Project limits consist primarily of residential lighting from surrounding neighborhoods and commercial lighting from buildings at urban areas and road intersections, especially SR-94/Jamacha Road intersection, SR-94/Steele Canyon Road intersection, SR-94/Lyons Valley Road intersection, and SR-94/Maxfield Road intersection. The SR-94 ROW is not illuminated, except for areas with pedestrian access at the previously-mentioned intersections. Sensitive wildlife receptors consist of nocturnal wildlife, and the most sensitive area is the wildlife preserves surrounding the southern half of the limits of the access alignments.

The existing noise environment is fully described in Section 2.14. Sensitive wildlife receptors consist primarily of birds, which rely on vocalizations for breeding and territory defense. The most sensitive land is the area surrounding the southern-half of the limits of the access alignments, which are surrounded by wildlife preserves.

Nesting Birds

Numerous common and rare bird species exist in the general vicinity of the Proposed Project limits, primarily hawks (*Buteo* spp.). Portions of the Proposed Project limits contain perching and nesting habitat for birds because of the presence of rock outcrops, large trees, and utility poles. Riparian corridors are an especially important habitat in the region because they provide shelter and nesting habitat, as well as food and water resources.

Roadkill

Vehicle-wildlife collisions ("roadkill") are a common cause of mortality for animal species on San Diego County's road system. A data and literature search was performed in 2012-2013. Over 90 journal articles and agency reports on the subject of roadkill and other road impacts were acquired and analyzed. Two data sources exist that pertain to roadkill and other road effects within the Proposed Project limits: Brehme (2003) and Brehme et. al. (2013). These researchers studied the effects of roads on wildlife, including SR-94, on the San Diego National Wildlife Refuge near the SR-94 / Jamacha Road Intersection, and on the Rancho Jamul Ecological Reserve, including SR-94 at the Jamul Creek drainage crossing (the “Daley Dip”) and on Proctor Valley Road. The study period was between April and December of 2001.

A custom wildlife-vehicle collision dataset was acquired from the UC Davis Road Ecology Center's California Road-Kill Observation System specifically for the relevant segment of SR-94 (the 19-mile stretch from downtown San Diego, through Jamul, to Otay Lakes Road). This dataset contains roadkill records that begin with October – December 2010, with 40 roadkills

reported in that initial timeframe. In 2011, the database reports a total of 270 roadkills, with 49% consisting of desert cottontails, 10% striped skunks, 6% California ground squirrels, 4% barn owls, 3% each of coyotes, gopher snakes, and Virginia opossums, and a few occurrences each of raccoons, long-tailed weasels, western rattlesnakes and other snakes, rock pigeons, spotted towhees, and other birds, deer, desert woodrats and other small rodents. In 2012, 309 roadkill observations were reported, with a similar distribution of species as in 2011. In the first quarter of 2013, the following roadkills were reported in the Jamul region by the California Road-Kill Observation System: 44 roadkills along SR-94 from SR-125 to Otay Lakes Road; 7 roadkills on Proctor Valley Road between SR-125 and SR-94; no roadkills reported on Jamacha Boulevard between SR125 and SR-94; and no roadkills reported on Otay Lakes Road between SR125 and SR-94. The great majority of these roadkills consist of three common animal species: ground squirrel (*Spermophilus* spp.); desert cottontail (*Sylvilagus audubonii*); and striped skunk (*Mephitis mephitis*). This dataset indicates that wildlife-vehicle collisions are a regular mortality factor for common wildlife in the Jamul region, and in San Diego County in general. This dataset does not contain obvious clusterings of roadkill that might identify a specific problem area within the Proposed Project limits. To the contrary, according to CDFW, the majority of the wildlife-vehicle collisions are focused on a specific portion of SR-94 outside of the Proposed Project limits, at the Jamul Creek low-water crossing (the "Daley Dip"), 1 mile south of the limits of the Access Road Alignments and north of Otay Lakes Road. The Jamul Creek drainage is apparently both an active wildlife corridor and a "hotspot" of wildlife-vehicle collisions where it crosses under SR-94. Within the Proposed Project limits, no special-status species were reported to be killed by wildlife-vehicle collisions in the California Road-Kill Observation System database or other agency reports.

2.19.3 Environmental Consequences

Special-status Animal Species

Alternatives 1-4

None of the wildlife surveys detected any special-status animal species within the Proposed Project limits. Therefore, no direct impacts to special-status animal species are expected from Proposed Project construction or operation.

Lighting and Noise

Potential lighting and noise impacts are similar for the Non-Access Road Intersections as they are for the access alignments. Therefore, the lighting and noise impact discussion addresses the Build Alternatives, which is inclusive of the common features.

Alternative 1-3: Build Alternatives

Construction activities associated with access alignments and the Non-Access Road Intersection Improvements would generate noise which could temporarily impact wildlife by disrupting normal animal behavior. An increase in levels of noise has the potential to affect behavioral and physiological responses in noise-sensitive wildlife species. Adverse responses include hearing loss, interference with vocalizations used during the breeding season, nest abandonment, and decrease in predator awareness, all of which have the potential to reduce population size in certain sensitive animal species. Temporary lighting provided during night-time construction could disrupt wildlife behavior if not properly shielded. No permanent lighting, beyond the signal light, would be installed as part of access alignments and the Non-Access Road Intersections. The temporary lighting impacts would be less-than-significant with the avoidance, minimization and/or mitigation measures listed in Section 2.19.4.

Operation of Alternatives 1-3 access alignments would not create any additional significant noise sources; note that construction of this road improvement Proposed Project would not generate any additional traffic. Current vehicular traffic on SR-94 is the primary noise source in the Proposed Project limits, and this loud noise source dominates and defines the noise environment for several thousand feet in all directions from SR-94. Certain project features would shift road alignments to adjacent lands on either side of the exiting SR-94 alignments, such as the Melody Road Access Alignment. However, all of these proposed alignment shifts fall within the noise environment defined by the current route of SR-94. Operational noise impacts of Alternatives 1-3 access alignments are less-than-significant.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets from Alternative 4: No Project Alternative; therefore, no impacts from lighting and noise would result.

Nesting Birds

Potential impacts to nesting birds are similar for the Non-Access Road Intersections as they are for the access alignments. Therefore, the nesting bird impact discussion addresses the Build Alternatives, which is inclusive of the common features.

Alternative 1-3: Build Alternatives

If construction activities occur during the breeding season, nesting birds could be directly impacted by tree trimming or removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. Therefore, construction activities associated with Alternatives 1-3: Build Alternatives could significantly impact nesting birds. Avoidance, minimization

and/or mitigation measures listed in Section 2.19.4 would reduce the impact to a less-than-significant level.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts to nesting birds would result.

Roadkill and Wildlife Corridors

Potential roadkill impacts are similar for the Non-Access Road Intersections as they are for the access alignments. Therefore, the roadkill impact discussion addresses the Build Alternatives, which is inclusive of the common features. The Proposed Project would be considered to have an adverse effect on wildlife if any of the following were demonstrated by Proposed Project development: significant increase in traffic volume to a roadway; regular mortality of any special-status species; significant increase in roadkill rates or decline in an animal population.

Alternative 1-3: Build Alternatives

Wildlife-vehicle collisions are a regular source of mortality for common wildlife species on SR-94 in the vicinity of the Proposed Project limits; however, no special-status wildlife species were reported to be killed within the Proposed Project limits by wildlife-vehicle collisions in the California Road-Kill Observation System database, agency reports, or the CNDDB. As discussed in Section 2.16: Natural Communities, retaining walls would be installed as part of Alternatives 1-3 and the Intersection Improvements. The erection of these retaining walls is seen as a beneficial impact because the walls would deter animals from entering busy roadways, and encourage wildlife to stay in the stream corridors or cross underneath existing culverts and bridges. Construction of Alternatives 1-3: Build Alternatives would also necessitate the enlargement of pipe culverts under SR-94, and would require the replacement of the concrete pipe culvert under Melody Road with a bridge that has a bottomless culvert design. These features would maintain or increase the heights of current under-road passageways for animals, which might deter animals from crossing roadways. Construction of Alternatives 1-3: Build Alternatives would not generate any additional traffic volume on SR-94 (see Section 2.4: Traffic and Transportation), so construction of Alternatives 1-3: Build Alternatives would not significantly increase the current mortality rate of wildlife-vehicle collisions on SR-94. However, implementation of Alternative 3: Melody Road Access Alignment, which requires a new road through a hardline preserve area, could generate a new source of roadkill. This is a significant impact for the Alternative 3: Melody Road Access Alignment.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts to road kill would result.

2.19.4 Avoidance, Minimization and/or Mitigation Measures

The following measures were identified for Alternatives 1-3: Build Alternatives to reduce the significant impacts upon animal species to a less-than-significant level. The significant wildlife corridor and roadkill impacts for Alternative 3: Melody Road Access Alignment are significant unavoidable.

Lighting and Noise Impacts

The following measures would reduce the potentially significant temporary construction impacts of lighting and noise for Alternatives 1-3: Build Alternatives to a less-than-significant level.

(1) During night-time construction, Proposed Project lighting (e.g., staging areas, equipment storage sites, and roadway) would be directed onto the roadway or construction site and away from sensitive habitat. Light glare shields would also be used to reduce the extent of illumination into adjoining areas, and

(2) Implement measures specified in Section 2.14 Noise to reduce noise impacts.

Nesting Birds

The following measures would reduce significant construction impacts for Alternatives 1-3: Build Alternatives to a less-than-significant level.

(1) Clearing and grubbing of vegetation on lands that may support active nests and construction activities adjacent to nesting habitat would occur outside of the breeding season (February 15 to September 15). If removal of habitat and/or construction activities is necessary on lands adjacent to nesting habitat during the breeding season, the applicant would retain a CDFW-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 100-feet of the construction area, determine the presence or absence of FESA- or CESA-listed birds (e.g., coastal California gnatcatcher, least Bell's vireo) on or within 300-feet of the construction area, and determine the presence or absence of nesting raptors within 500-feet of the construction area. The pre-construction survey would be conducted within 10 calendar days prior to the start of construction, the results of which would be submitted to USFWS and CDFW, as appropriate, for review and approval prior to initiating any construction activities. If nesting birds are

detected by the biologist, the following buffers would be established: no work would occur within 100-feet of a non-listed nesting migratory bird nest; no work would occur within 300-feet of a listed bird nest, and no work would occur within 500-feet of a raptor nest. There may be a reduction of buffer size depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance).

2.20 THREATENED AND ENDANGERED SPECIES

2.20.1 Regulatory Setting

The primary federal law protecting threatened and endangered species is FESA: 16 USC Section 1531, et seq. See also 50 CFR Part 402. This act and later amendments provide for the conservation of endangered and threatened species and the ecosystems upon which they depend. Under Section 7 of this act, federal agencies, such as the FHWA, are required to consult with the USFWS and the NOAA Fisheries Service to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species or destroy or adversely modify designated critical habitat. Critical habitat is defined as geographic locations critical to the existence of a threatened or endangered species. The outcome of consultation under Section 7 may include a Biological Opinion with an Incidental Take statement, a Letter of Concurrence and/or documentation of a No Effect finding. Section 3 of FESA defines take as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect or any attempt at such conduct."

California has enacted a similar law at the state level, the CESA, California Fish and Game Code Section 2050, et seq. CESA emphasizes early consultation to avoid potential impacts to rare, endangered, and threatened species and to develop appropriate planning to offset Project-caused losses of listed species populations and their essential habitats. The CDFW is the agency responsible for implementing CESA. Section 2081 of the Fish and Game Code prohibits "take" of any species determined to be an endangered species or a threatened species. Take is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA allows for take incidental to otherwise lawful development projects; for these actions an incidental take permit is issued by the CDFW. For species listed under both FESA and CESA requiring a Biological Opinion under Section 7 of the FESA, the CDFW may also authorize impacts to CESA species by issuing a Consistency Determination under Section 2080.1 of the Fish and Game Code.

Another federal law, the Magnuson-Stevens Fishery Conservation and Management Act of 1976, was established to conserve and manage fishery resources found off the coast, as well as anadromous species and Continental Shelf fishery resources of the United States, by exercising (A) sovereign rights for the purposes of exploring, exploiting, conserving, and managing all fish within the exclusive economic zone established by Presidential Proclamation 5030, dated March 10, 1983, and (B) exclusive fishery management authority beyond the exclusive economic zone over such anadromous species, Continental Shelf fishery resources, and fishery resources in special areas.

2.20.2 Affected Environment

Botanical surveys of the Proposed Project limits were conducted in March, April, and June 2013. No threatened or endangered plant species were detected within the Access Road Alignments Proposed Project limits or within the Non-Access Road Intersections Proposed Project limits. General wildlife surveys were performed in May, August, and November of 2013, and January, May, and August of 2014. Protocol surveys for California coastal gnatcatcher were performed in April and May 2013. Protocol surveys for Quino checkerspot butterfly and Hermes copper butterfly were performed in 2013 during the specified flight season. Neither the general wildlife surveys nor the protocol surveys detected any threatened or endangered species.

For this Proposed Project, informal consultation was initiated in 2013 with USFWS and CDFW staff. CDFW and USFWS submitted comments on the Notice of Preparation of this EIR in September 2013. CDFW staff did not identify any specific impacts to State-listed species or State Species of Concern. However, CDFW staff did request the inclusion of certain avoidance and minimization measures, which were adopted in this EIR. Several meetings with staff of Caltrans and USFWS and CDFW have occurred in 2014 and 2015. These meetings included discussions of potential impacts to threatened and endangered species, potential impacts to CDFW lands at RJER and HCWA, and potential avoidance and minimization measures. A list of any endangered species and critical habitat occurring within a 10-mile radius of the Proposed Project limits was acquired from USFWS (**Appendix I**). No fishery resources exist in the Proposed Project limits because all waterways flow only ephemerally or intermittently and do not sustain any fish populations. Therefore, no consultation with NOAA Fisheries was necessary.

Critical Habitat

No critical habitat for any federally-listed species occurs within, or adjacent to, the Proposed Project limits.

Threatened and Endangered Species

Quino Checkerspot Butterfly (*Euphydryas editha quino*)

Quino checkerspot butterfly is federally designated as an endangered species. The Proposed Project limits are not included in the designated critical habitat of the Quino checkerspot butterfly. The Quino checkerspot butterfly occurs in the general vicinity of the Access Road Alignments Proposed Project limits and a monitored reference site is located on the Rancho Jamul Ecological Reserve (RJER) approximately 3.5 miles to the south of the Access Road Alignments Proposed Project limits. Monitored primary host plant populations in San Diego County consisted of dwarf plantain (*Plantago erecta*), woolly plantain (*Plantago patagonica*), and thread-leaved bird's beak (*Cordylanthus rigidus*).

Protocol surveys for Quino checkerspot butterfly were performed during the 2011, 2012, and 2013 survey seasons within the Access Road Alignments Proposed Project limits, and in 2013 for the Non-Access Road Intersections Proposed Project limits. No Quino checkerspot butterflies were detected in any of the Proposed Project limits. Habitat assessments performed during the surveys concluded that the Non-Access Road Intersections Proposed Project limits and the Access Road Alignments 1-2 Proposed Project limits provided no suitable habitat for Quino checkerspot butterfly. However, the limits of the Melody Road Access Alignment contained patches (approximately 16-square feet) of the host plant dwarf plantain in the proposed Access Road Alignment on the 87-acre parcel (**Figure 2.14-1),** and future protocol surveys would be required if the Melody Road Access Alignment is ultimately selected for construction.

Hermes Copper Butterfly (*Hermelycaena hermes*)

Hermes copper butterfly is a candidate species for listing under the federal Endangered Species Act. The obligate host plant is spiny redberry (*Rhamnus ilicifolia*). Hermes copper butterfly was not detected during protocol surveys in 2011, 2012, or 2013 in the Access Road Alignments Proposed Project limits or the Non-Access Road Intersections Proposed Project limits. It was concluded that the Non-Access Road Intersections Proposed Project limits and Access Road Alignment 1-2 Proposed Project limits provided no suitable habitat for Hermes copper butterfly. However, the limits of the Melody Road Access Alignment contained patches of spiny redberry (approximately eight square feet) on the 87-acre parcel (**Figure 2.14-1),** and future protocol surveys will be required if the Melody Road Access Alignment is ultimately selected for construction.

Coastal California Gnatcatcher (*Polioptila californica californica*)

Coastal California gnatcatcher is federally designated as a threatened species. This bird is an obligate, permanent resident of coastal sage scrub in southern California; occasionally, other habitats such as riparian zones and grasslands are used outside of the breeding season. Coastal California gnatcatcher has been reported on the RJER. USFWS protocol level surveys of the Access Road Alignments Proposed Project limits were conducted 2011 and 2013. USFWS protocol level surveys of the Non-Access Road Intersections Proposed Project limits were conducted in 2013. These surveys did not detect coastal California gnatcatcher. It was concluded that the Access Road Alignments Proposed Project limits did not have suitable habitat because of the absence of shrubs, particularly California sagebrush and flattop buckwheat, which typically support coastal California Gnatcatchers.

Protocol surveys were performed within the Non-Access Road Intersections Proposed Project limits in April and May of 2013; these surveys did not detect coastal California gnatcatcher. No suitable habitat for coastal California gnatcatcher exists within the Non-Access Road Intersections Proposed Project limits. Suitable habitat for coastal California gnatcatcher does

exist in the general vicinity of the Non-Access Road Intersections Proposed Project limits. Suitable habitat for the coastal California gnatcatcher occurs in the riparian corridor of Jamacha channel near the SR-94/Jamacha Boulevard Intersection Proposed Project limits and the SR-94/Jamacha Road Intersection Proposed Project limits.

Least Bell's Vireo (*Vireo bellii pusillus*)

Least Bell's vireo is federally designated as an endangered species. Least Bell's vireo is a small, plain, insectivorous songbird that typically nests in willow thickets and other dense, shrubby vegetation communities found near water at elevations below 2,000-feet. These habitats are typically associated with willow, cottonwood, mulefat, blackberry, and/or mesquite. No critical habitat for this species occurs within the Proposed Project limits, but critical habitat is designated in the riparian corridors of Jamul Creek and Dulzura Creek, which are located several miles south of the Proposed Project limits. The RJER was established, in part, to benefit least Bell's vireo.

No least Bell's vireos were observed during reconnaissance-level and USFWS protocol-level bird surveys conducted in 2011 and 2013 in the Access Road Alignments Proposed Project limits. Some suitable habitat exists within the limits of the Melody Road Access Alignment within the Willow Creek riparian corridor. The nearest reported least Bell's vireo occurrence (SanBIOS database) is on the RJER, 0.7 miles south of the Access Road Alignments Proposed Project limits.

No least Bell's vireos were observed during reconnaissance-level and USFWS protocol-level bird surveys in 2013 within the Non-Access Road Intersections Proposed Project limits. No suitable habitat for least Bell's vireo exists within the Non-Access Road Intersections Proposed Project limits. Suitable habitat for least Bell's vireos does exist in the general vicinity of the Non-Access Road Intersections Proposed Project limits. Least Bell's vireos were reported by the CNDDB in Jamacha Channel approximately 500-feet from the SR-94/Jamacha Boulevard Intersection Proposed Project limits and in the Sweetwater River corridor approximately 1,300-feet from the SR-94 Jamacha Road Intersection Proposed Project limits.

2.20.3 Environmental Consequences

Construction Impacts to Quino Checkerspot Butterfly or Hermes Copper Butterfly

Non-Access Road Intersections

Construction of the intersection improvements would not impact Quino checkerspot butterfly or Hermes Copper butterfly or their potential habitats because there is no suitable habitat for these species.

Alternatives 1-3: Build Alternatives

The impacts for Alternatives 1-3: Build Alternatives include those described above for the Non-Access Road Intersections, as well as those below for the Access Road Alignments.

Construction of any of the Alternatives 1-3: Build Alternatives would not directly impact Quino checkerspot butterfly or Hermes Copper butterfly because they are not present with the Project Areas. Construction of the Reservation Road and Daisy Drive Access Alignments would not impact any suitable habitat for these species. Construction of the Melody Road Access Alignment would impact approximately 16-square feet of dwarf plantain, which is potential habitat for Quino checkerspot butterfly (located within the proposed road alignment on the 87-acre parcel). Construction of the Melody Road Access Alignment would also impact approximately eight square feet of spiny redberry, which is potential habitat for Hermes copper butterfly (located within the proposed road alignment on the 87-acre parcel). This is considered a significant impact. The avoidance, minimization and/or mitigation measures listed in Section 2.20.4 would reduce the impact to a less-than-significant level.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would result from Alternative 4: No Project Alternative; therefore, no impacts to Quino Checkerspot Butterfly or Hermes Copper Butterfly would result under this alternative.

2.20.4 Avoidance, Minimization and/or Mitigation Measures

Quino Checkerspot Butterfly

The following measures would be implemented to reduce the significant impacts of the Melody Road Alignment to Quino checkerspot butterfly habitat to a less-than-significant level:

(1) A pre-construction, protocol survey for Quino checkerspot butterfly would be performed to ensure that no protected butterflies have migrated into the Proposed Project limits. If the survey returns positive results, no construction would occur in the affected areas. USFWS would be consulted, and standard mitigation measures would be implemented before any ground disturbance occurs. Butterflies would be passively or actively relocated, and impacts to occupied habitat would be compensated by the preservation of lands containing suitable habitat (or in lieu payments to a mitigation bank) at compensation ratios of 3:1 (as specified in the BMO). Biological monitoring during groundbreaking would also be implemented. Implementation of these mitigation measures would ensure that no mortality of butterflies occurs and that the species would have additional habitat within which to proliferate.

(2) To compensate for the impacts to 16-square feet of dwarf plantain, and using a 3:1 mitigation ratio as specified in the BMO, 48-square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank such as the Crestridge Conservation Bank or by deed restriction of qualified lands (such as on the 87-acre parcel). Additionally, the impacted stands of dwarf plantain would be transplanted to this preserve area before construction begins. There would be 3 years of plant maintenance to ensure successful establishment and control invasive weeds.

Hermes Copper Butterfly

The following mitigation measures were identified to reduce the significant impacts of the Melody Road Access Alignment to Hermes copper butterfly habitat to a less-than-significant level:

(1) A pre-construction, protocol survey for Hermes copper butterfly would be performed to ensure that no protected butterflies have migrated into the Proposed Project limits. If the survey returns positive results, no construction would occur in the affected areas. USFWS would be consulted, and standard mitigation measures would be implemented before any ground disturbance occurs. Butterflies would be passively or actively relocated, and impacts to occupied habitat would be compensated by the preservation of lands containing suitable habitat (or in lieu payments to a mitigation bank) at compensation ratios of 3:1 (as specified in the BMO). Biological monitoring during groundbreaking would also be implemented. Implementation of these mitigation measures would ensure that no mortality of butterflies occurs and that the species would have additional habitat within which to proliferate.

(2) To compensate for the impacts to 8 square feet of spiny redberry, and using a 3:1 mitigation ratio as specified in the BMO, 24-square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank such as the Crestridge Conservation Bank or by deed restriction of qualified lands (such as on the 87-acre parcel). Additionally, the impacted stands of spiny redberry would be transplanted to this preserve area before construction begins. There would be 3 years of plant maintenance to ensure successful establishment and control invasive weeds.

2.21 INVASIVE SPECIES

2.21.1 Regulatory Setting

On February 3, 1999, President William J. Clinton signed EO 13112 requiring federal agencies to combat the introduction or spread of invasive species in the United States. The order defines invasive species as "any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health." Although no federal approvals are required for this Proposed Project, Caltrans analyzes the issue of invasive species within their environmental compliance documents.

2.21.2 Affected Environment

Invasive species already dominate the plant community compositions within the limits of the Non-Access Road Intersections and access alignments. Non-native grassland, consisting of European grasses and forbs, is the dominant natural habitat within the Proposed Project limits. Some of the other prevalent invasive plants in the Proposed Project limits include: Russian thistle (*Salsola* sp.), Chinese tallow (*Sapium sebiferum*); tree-of-heaven (*Ailanthus altissima*); Eucalyptus (*Eucalyptus* spp.); fig (*Ficus* spp.); Himalayan blackberry (*Rubus armeniacus*); castor bean (*Ricinus communis*); and tree tobacco (*Nicotiana glauca*). The only invasive animal species that was noted was the Louisiana red swamp crayfish (*Procambarus clarkii*), which is found at a density of about one per square-foot in Jamacha channel in the SR-94/Jamacha Road Intersection Proposed Project limits.

2.21.3 Environmental Consequences

Invasive Species

Alternatives 1-3: Build Alternatives

Construction of Alternatives 1-3: Build Alternatives has the potential to introduce or encourage the spread of invasive species via construction equipment that can transport weed seeds or the use of erosion control products containing weed seed. However, the use of Caltrans Standard Measures (see Section 2.21.4) ensures the impact is less-than-significant.

Alternative 4: No Project Alternative

No physical improvements to SR-94 or area streets would occur under Alternative 4: No Project Alternative; therefore, no invasive species impact would result under this Alternative.

2.21.4 Avoidance, Minimization and/or Mitigation Measures

No avoidance, minimization and/or mitigation measures are required for invasive species. The following Caltrans Standard Measures would be implemented during and following construction activities.

(1) In compliance with the Executive Order on Invasive Species, EO 13112, and guidance from the FHWA, the landscaping and erosion control included in the Proposed Project would not use species listed as invasive.

(2) For any erosion control techniques involving plant fibers or seed mixes, such as straw wattles or hydroseeding, the contractor must use products that are certified weed free. Before entering or leaving the construction and mitigation sites, equipment would be inspected for evidence of plant residues (seeds, twigs, leaves, etc.). Should any plants residues or seeds be detected, the equipment would be pressure washed to ensure no invasive plant species would be brought into or removed from the site.

CHAPTER 3.0

CUMULATIVE IMPACTS

Chapter 3 - Cumulative Impacts

3.1 REGULATORY SETTING

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of the Proposed Project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a period of time.

Cumulative impacts to resources in the Proposed Project area may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and introduction or promotion of predators. They can also contribute to potential community impacts identified for the Proposed Project, such as changes in community character, traffic patterns, housing availability, and employment.

CEQA Guidelines Section 15130 describes when a cumulative impact analysis is necessary and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts under CEQA can be found in Section 15355 of the CEQA Guidelines.

3.2 AFFECTED ENVIRONMENT

3.2.1 Geographic Boundary and Time Frame

The geographic boundary, or resource study area (RSA), for many resources in the cumulative analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This geographic boundary is necessary to evaluate impacts on resources that extend beyond a smaller jurisdiction such as the Proposed Project alternatives sites or a single community such as Jamul. Examples of such resources are biological resources and the areas of the transportation network. In some cases, however, effects would only be noticeable on a local level. For this reason, effects on some resources (e.g., geology and hazardous waste) are analyzed at a level that corresponds to the smaller boundary of the Proposed Project's alternatives locations. The relevant boundary is discussed under each resource heading.

The time frame of the cumulative impacts analysis extends to 2035. Beyond 2035, information on growth patterns and future activities becomes scarce and uncertainties increase, limiting the usefulness of a more extended analysis. For many resources, information is unavailable to

extend meaningful analysis to 2035. In the event that projections for specific resources are not available for 2035, attempts have been made to provide all relevant information.

3.2.2 Cumulative Issues/Resources Discussed

This cumulative impact analysis evaluates issues/resources directly or indirectly impacted by the Alternatives, even if the Proposed Project impacts would be relatively small. The environmental analyses in Chapter 2 document the source and degree of impact for each issue addressed in this section. For determining significance of cumulative impacts, CEQA Guidelines Section 15130 (a)(1) states: "An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR." Also, CEQA Guidelines Section 15130 (a)(2) states: "When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR."

As discussed in Chapter 2, as part of the scoping and environmental analysis conducted for the Proposed Project, the following environmental issues were considered but no adverse impacts were identified:

- Coastal zone
- Wild and scenic rivers
- Farmlands/timberlands
- Paleontology

Consequently, there is no further discussion of these issues in this cumulative analysis.

In addition, as a result of the analysis of individual issues/resources in Chapter 2, the Proposed Project was determined to not impact the following issues/resources for the reasons summarized for each. For these issues/resources, there would be no combined cumulative impacts with any other projects; these issues/resources are therefore not evaluated in further detail in this cumulative analysis.

- Parks and Recreational Facilities: As discussed in Section 2.1.3 of this EIR, the Non-Access Road intersections would have no impact on San Diego County park or recreational facilities or on the NWR, RJER or HCWA given that the intersections are not adjacent to or within close proximity to these lands. None of the Access Road Alignments would be located on San Diego County park land, or on or adjacent to the San Diego County NWR; and neither park features nor NWR recreational activities would be disrupted due to Access Road Alignment Proposed Project features. Although a strip of RJER land would be needed for Alternatives 2-3 and a strip of HCWA land

would be needed for all three build alternatives, those lands are occupied by grasslands and utility poles and are not used for recreational purposes.

- Growth: As discussed in Section 2.2 of this EIR, the Proposed Project is designed to increase capacity specifically to accommodate projected traffic resulting from the JIV Gaming Development Project, which has already been approved and is currently under construction. The Non-access Road intersections and Access Road Alignments would therefore not provide excess capacity that would encourage growth in rural Jamul. The Proposed Project features also would not remove other barriers to growth or affect housing and employment patterns. Although accessibility to the JIV would change with Alternative 3: Melody Road Alignment (but not with the other alternatives or Non-access Road intersections), the alignment of Alternative 3 is not likely to induce growth because the 87-acre parcel crossed by the new access road contains zoning that is restrictive to future urban growth, and the access road would be a single-purpose road.

- Cultural Resources: As discussed in Section 2.7 of this EIR, no impacts to known historical resources would occur with implementation of the Proposed Project. In particular, two archaeological sites considered eligible for the NRHP/CRHR in the vicinity of the Proposed Project (but outside the area to be directly affected by the Proposed Project) would be protected as Environmentally Sensitive Areas.

- Climate Change: As discussed in Section 2.13 of this EIR, the Proposed Project would improve traffic flow and decrease overall congestion in the Proposed Project area, so would not increase operational greenhouse gas emissions. Therefore, the Proposed Project would not result in a significant operational impact associated with greenhouse gas emissions and climate change.

3.2.3 Cumulative Project List

CEQA Guidelines Section 15130(b) presents two possible approaches for considering past, present, and future reasonably foreseeable projects. It indicates that either of the following could be used:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

This EIR uses the first method, where specific reasonably foreseeable projects are identified.

For cumulative impact analysis, a total of 17 projects were identified in consultation with County staff. In addition, a search of the CEQAnet database was conducted in June 2015 and no additional projects that could result in cumulatively considerable contributions to impacts of the Proposed Project were identified. Fifteen future development projects could add traffic to the study area intersections or generate other impacts; these projects consist primarily of land subdivisions and the building of single-family estate homes, plus the approved JIV Gaming Facility that is currently under construction. The projects planned in the future that may affect conditions near the project site are listed in **Table 3-1** and shown in **Figure 3-1**. These projects are subject to separate approval processes and are expected to be completed regardless of the status of the SR-94 Improvement Project.

In addition, per the County of San Diego's Mobility Element of the General Plan, two roadway segment improvements were assumed to be completed under the Horizon Year conditions: the improvement of Proctor Valley Road from a dirt road to a two-lane light collector from Chula Vista city limits to SR-94; and realignment of Otay Lakes Road with the intersection of Honey Springs Road to form a four-way intersection at SR-94.

TABLE 3.1
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
1. Jamul Indian Village Gaming Project JIV Tribal Lands, San Diego County A 203,000 square foot gaming facility on a 6.2 acre reservation held in trust by the United States for the benefit of the JIV.	**Hazardous Materials -** Excavation, trenching and grading, and other such earth-moving activities may uncover a previously unknown underground fuel storage tank, contaminated soil, or other hazardous material issue, posing a risk to human health for construction personnel if contaminants are encountered. Mitigation that includes implementing a remediation plan and Health and Safety Plan if hazardous materials are encountered would reduce impacts to less than significant. **Wildfire Hazards -** The project is located within an area of moderate to high fire hazard. Construction activities may introduce potential ignition sources that have the potential to initiate a wildfire, which could cause injury or death of people or property losses. Mitigation that includes employing construction best management practices such as using spark arresters on construction equipment, keeping construction areas wetted with water trucks, and implementing a fire safety/fire response plan would reduce impacts to less than significant. **Biological Resources -** Nesting birds could be directly impacted by tree removal, and indirectly impacted by noise, vibration, and other construction-related disturbance. Federally-listed species that occur in the vicinity could	Final Tribal Environmental Evaluation Approved January 2013. Project is under construction.

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
1. Jamul Indian Village Gaming Project (cont.)	migrate onto the project area, and construction activities, especially excavation and rough grading, could result in the take of federally-listed species. Mitigation that includes conducting pre-construction surveys, delaying construction, and creating fenced buffer areas would reduce impacts to less than significant. **Traffic/Circulation: Construction Traffic -** Impacts of truck trips and safety and operations at the project driveway could temporarily affect local traffic conditions. Mitigation that includes implementing a Construction Management Plan and a Traffic Management Plan, and restricting timing of construction truck traffic would reduce impacts to less than significant. **Traffic/Circulation: Operational Traffic -** The project would contribute to unacceptable traffic level of service at intersections during existing plus project conditions and near-term plus project conditions, and at intersections, road segments, and arterials during horizon year (2035) plus project conditions. Mitigation that includes the Tribe financing and implementing recommended intersection improvements, paying their fair share for other measures, and paying into the County's Transportation Impact Fee would reduce impacts to less than significant. **Noise: Construction -** The use of construction equipment would create noise and vibration during grading and preparation of the project site and blasting. Mitigation that includes implementing noise abatement measures, implementing a Blast Plan, and monitoring and recording each blast near sensitive receptors would reduce impacts to less than significant. **Noise: Operational -** Roof-mounted mechanical equipment such as fans, pumps, compressors, chillers, and cooling towers could generate unacceptable noise. Mitigation that includes installing acoustical louvers, orienting the ventilation away from sensitive uses, and implementing other needed measures to ensure County Code requirements are met would reduce impacts to less than significant. **Greenhouse Gas Emissions -** GHG emissions would be generated throughout the operational life of the proposed project, including emissions from increased vehicle trips by employees and visitors. Mitigation that includes implementing regulatory measures, utility reduction goals and recycling requirements, design features such as green roof technology, and other mitigation measures specified in the environmental document would reduce impacts to less than significant.	

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
1. Jamul Indian Village Gaming Project (cont.)	**Public Services -** The project would result in additional calls for law enforcement services to local law enforcement agencies, which is typical of commercial development. Mitigation that includes providing on-site security for gaming operations to reduce and prevent criminal and civil incidents would reduce impacts to less than significant.	
2. Morgan Minor Subdivision (TPM 20550) San Diego County Two single-family estate homes proposed to the north of the Proctor Valley Road/Poplar Meadow Lane intersection.	**Biological Resources -** Diegan coastal sage scrub, southern mixed chaparral, and wetland habitat in a freshwater seep were located on the site. Mitigation that includes securing adequate credits in a County approved mitigation bank within the boundaries of the MSCP would reduce impacts to less than significant. **Hydrology/Drainage -** Potentially negative impacts on stormwater quality could occur with the project. Mitigation that includes implementing and maintaining Best Management Practices (such as grease/oil traps or other filtration systems to collect pollutants in all the storm drain inlets), retaining existing habitat, and including natural buffer zones, would reduce impacts to less than significant.	PDS 2001-3200-20550 Mitigated Negative Declaration #89-19-036 SCH# 2001071063 Adopted October 10, 2001
3. Hendrix Subdivision (TM 5154) San Diego County Five single-family estate homes proposed east of SR-94 (Campo Road) on Las Palmas Road.	**Biological Resources -** The site contains coastal sage scrub, a sensitive habitat that may support federally threatened California gnatcatcher. Mitigation that includes purchasing coastal sage scrub in a County approved mitigation bank, and not clearing coastal sage scrub during gnatcatcher breeding season would reduce impacts to less than significant.	PDS 2004-3100-5154 Mitigated Negative Declaration #98-19-021 SCH #1999121053 Adopted April 5, 2001
4. Mintz Subdivision (TM 5213) San Diego County Ten single-family estate homes proposed north of Skyline Truck Trail and east of Hidden Trail Drive.	**Traffic/Circulation -** The project would add traffic to the intersection of Lyons Valley Road at Skyline Truck Trail and possibly result in limited sight distance along Skyline Truck Trail. Mitigation that includes contributing to the cost of a traffic signal at the intersection of Lyons Valley Road at Skyline Truck Trail and providing adequate sight distance along Skyline Truck Trail from the project entrance would reduce impacts to less than significant. **Biological Resources -** The site contains southern mixed chaparral and coastal sage scrub which could be disturbed by the project. The site contains no wetland habitats, but does contain a drainage that is considered a Water of the United States, which if impacted may cause alterations to wetland habitats and/or watersheds. Also, drainage and topographic features that appear to be appropriate wildlife dispersal or migration corridors occur on-site. Mitigation that includes placing a portion of the site in an open space easement protected by fencing, documenting coordination/appropriate permits from the California Department of Fish and Wildlife	PDS 2001-3100-5213 Mitigated Negative Declaration #78-19-101A SCH # 2002071044 Adopted October 24, 2002.

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
4. Mintz Subdivision (TM 5213) (cont.)	and/or Army Corps of Engineers, and installing a pipe/culvert underneath the roadway to allow continued movement of small mammals through the drainage would reduce impacts to less than significant. **Noise** - The project could expose people to noise levels in excess of the County General Plan or Noise Ordinance. Mitigation that includes granting to the County of San Diego a Noise Protection Easement over the entire area of Lots 1 and 2 such that acoustical studies would be conducted and noise mitigation measures would be incorporated into the project design and building plans would reduce impacts to less than significant.	
5. Jamul Highlands Subdivision (TM 5289) San Diego County 25 single-family estate homes proposed south of the Valley Road/Jamul Highlands Road intersection.	The project is currently in active processing at the County, and information is not publically available.	PDS 2014-3100-5289 In process
6. Residential Development (TPM 20626) San Diego County, APN 597-042-32 Three single-family estate homes proposed on the west side of Proctor Valley Road, north of the Proctor Valley Road/Melody Road intersection.	The project was found to be exempt from CEQA as specified under section 15315, Minor Land Divisions of the State CEQA Guidelines because the project would not have any significant impact on the environment including cumulative impacts, is not located on a scenic highway or documented hazardous waste site, and would not impact cultural or historic resources. In addition, there are no sensitive habitats or species within the project area, which is entirely urban/developed and does not support native vegetation.	PDS 2002-3200-20626 Categorical Exemption Environmental Review # 01-19-023 Adopted December 20, 2001
7. Yacoo Minor Subdivision (TPM 20628) San Diego County Four single-family estate homes proposed on Steele Canyon Road north of Proctor Valley Road.	**Biological Resources** - Vegetation communities on the project property include Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, southern mixed chaparral, eucalyptus woodland, and developed land. The site contains a drainage feature which supports southern mixed chaparral. Because Diegan coastal sage scrub occurs on the project site, it is possible that the gnatcatcher may occur in the project vicinity, although none were observed during the field survey. Mitigation that includes avoiding all jurisdictional waters and wetlands by placing these watersheds in a biological open space easement with an appropriate biological buffer, purchasing coastal sage scrub within a County-approved Mitigation Bank, and constructing outside of gnatcatcher nesting season would reduce impacts to less than significant.	PDS 2002-3200-20628 Mitigated Negative Declaration Environmental Review # 01-19-024 SCH # 2002091109 Adopted February 11, 2003

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
8. Residential Subdivision San Diego County 20 single-family estate homes proposed east of the JIV Tribal Lands and south of Olive Vista Drive.	The level of information required to determine the project's potential impacts at the time of this evaluation was not available.	Pending
9. Blanco Parcel Map (TPM 20599) San Diego County Four single-family estate homes proposed on the east side of SR-94, north of Melody Road.	This project was withdrawn from processing at the County without being developed. No impacts have occurred.	PDS 2003-3200-20599 Withdrawn
10. Stein Barth Minor Subdivision (TPM 20868) San Diego County Two single-family estate homes proposed north of the JIV Tribal Lands and south of Olive Vista Drive.	A Negative Declaration (ND) dated January 28, 1992 for the Steinbarth Minor Subdivision, TPM 19955 was adopted by the Director of the Department of Planning and Land Use on April 9, 1992. The adopted ND found the project would not have any potentially significant effect. The 2006 Mitigated Negative Declaration found the impacts summarized below. **Traffic/Circulation** - The project would add minor traffic to the neighboring roadways and intersections. The payment of the Transportation Impact Fee, which will be required at issuance of building permits, will avoid potential cumulative traffic impacts. **Biological Resources** - Habitats on site include coastal sage scrub and non-native grassland. Mitigation that includes securing Tier II or higher Tier habitat credit in a County approved mitigation bank located within the MSCP would reduce impacts to less than significant.	PDS 2004-3200-20868 Mitigated Negative Declaration # 91-19-038A Adopted November 24, 2006
11. Pioneer Minor Subdivision (TPM 20594) San Diego County Three single-family estate homes proposed west of the JIV Tribal Lands and north of Melody Lane.	**Biological Resources** - The project site encompasses disturbed wetlands, mule fat scrub, non-native grassland, and buckwheat scrub. Also, drainage and topographic features that may be appropriate wildlife dispersal or migration corridors occur on-site. Mitigation that includes placing all of the disturbed wetland area and mule fat scrub, along with some non-native grassland in an open space easement, and protecting the area with permanent fences plus a minimum 25-foot buffer would reduce impacts to less than significant. In addition, the site owner purchased 0.1 acres of Tier II Buckwheat scrub and 0.6 acres of Tier III non-native grasssland habitat credits at the San Vicente Conservation Bank as off-site mitigation.	PDS 2002-3200-20594 Mitigated Negative Declaration #01-19-004 SCH# 2001081012 Adopted December 4, 2001
12. Otay Ranch-Village 19 San Diego County, APN 597-190-22 20 single-family estate homes proposed south-west of the JIV Tribal Lands and south of Melody Lane.	The level of information required to determine the project's potential impacts at the time of this evaluation was not available.	Pending

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
13. Jamul Estates II San Diego County, APN 505-67-203 Currently Sweetwater Village; proposed 126-unit residential condominium development on a 20-acre parcel located at the north and east of the intersection of Jamacha Boulevard and Sweetwater Springs Boulevard.	The level of information required to determine the project's potential impacts at the time of this evaluation was not available.	PDS 2014-GPA-14-003; PDS2014-TM-5588, ER-14-19-005
14. Simpson Farms San Diego County 98 single-family estate homes and 115,000 square feet of commercial uses generally located on the northeast corner of the SR-94/Jefferson Road intersection.	The project is currently in active processing at the County, and information is not publically available.	PDS 2005-3100-5460 In process
15. Peaceful Valley Ranch (TM 5341) San Diego County Project proposes the subdivision of 181.31acres for an estate residential development, 46 new estate residential lots, a 6.7-acre equestrian facility and new joint-use fire and administration offices for the SDRFD and the USFWS. The project is located east of SR-94 and would use the intersection of SR-94 and Melody Road as a single access point.	**Traffic/Circulation** - The project would add traffic to neighboring roadway segments including: SR-94 from Jamacha Road to Steele Canyon Road, SR-94 from Steele Canyon Road to Lyons Valley Road, and SR-94 from Lyons Valley Road to Melody Road. Mitigation that includes making a fair-share contribution towards improvements at the SR-94/Jefferson Road intersection as requested by Caltrans would reduce impacts; however, project impacts on SR-94 at this location would remain significant after mitigation. Mitigation that includes making payment to the County's Transportation Impact Fee (TIF) program to partially fund construction of improvements to Campo Road (SR-94) segments and intersections would reduce impacts at the other roadway segments and at intersections to less than significant and less than cumulatively considerable. Sight distance could be inadequate along the project's frontage onto Campo Road (SR-94). Mitigation that includes widening the existing Campo Road (SR-94) roadway shoulder along the project's frontage onto Campo Road (SR-94) would improve sight distance along this segment; however, potential impacts to Campo Road (SR-94) would remain significant after mitigation. **Biological Resources** - Vegetation on the site includes coastal sage scrub, chaparral, mule fat scrub, coast live oak woodland, riparian woodland, non-native grassland, and eucalyptus woodland. Mitigation that includes acquiring habitats of equal or higher tier at a County-approved mitigation bank within the MSCP or preserving and managing the required habitat types and acreage in permanent biological open space in a County-approved location, revegetating impacted vegetation, and providing temporary and permanent fences with signage would reduce impacts to less than significant. Sensitive avian species may breed on the site (Cooper's hawk, Bell's sage sparrow, northern harrier, California horned lark, loggerhead shrike, and red-shouldered hawk). These species may be affected by construction	Withdrawn, but the fire station was constructed. PDS 2004-3100-5341 Final EIR Environmental Review #04-19-007 SCH#2005011064 Adopted July 23, 2008

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
15. Peaceful Valley Ranch (TM 5341) (cont.)	activities such as clearing of trees and by construction noise. Mitigation that includes avoiding clearing and grading within 300 feet of occupied tree-nesting raptor habitat or 800 feet within occupied ground-nesting raptor habitat during raptor breeding season would reduce impacts to less than significant. A wetland bisects the site north to south. Mitigation that includes purchasing credits of wetland habitat at the Rancho Jamul Mitigation Bank or other mitigation bank approved by the County would reduce impacts to less than significant. Groundwater dependent sensitive plants could be affected by groundwater drawdown exceeding three feet below the historic groundwater elevation table. Mitigation that includes implementing a groundwater level monitoring and mitigation program would reduce impacts to less than significant. **Noise -** Noise-sensitive land uses could be affected by increased traffic noise from the project. Mitigation that includes conducting a site-specific acoustical analysis demonstrating that the allowable interior and exterior sound level limits are not exceeded and incorporating recommendations or mitigation measures of the acoustical analysis into the project design and building plans would reduce impacts to less than significant. **Cultural Resources -** Cultural resources exist on site that could be affected by encroachment into the open space easement area, and on Site SDl-11,050 Locus A, by people and horses using the proposed equestrian facility. Also, previously unidentified potentially significant cultural resources could be discovered. Mitigation that includes implementing an archaeological site capping plan for the protection of site CA-SDl-11,050 Locus A, installing temporary fencing during clearing and grading activities, and providing archaeological monitors who have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources would reduce impacts to less than significant. **Groundwater -** Groundwater dependent sensitive plants exist on site which could be affected by groundwater drawdown. Mitigation that includes implementing a groundwater level monitoring and mitigation program would reduce impacts to less than significant. **Hazards and Hazardous Materials -** Evidence of potential hazardous material issues such as underground storage tank (UST) and stained soil was found on site. Mitigation including excavating the area under the maintenance/workshop building and removing the UST if found, and remediating the area of stained soils would reduce impacts to less than significant.	

TABLE 3.1 cont.
CUMULATIVE FUTURE DEVELOPMENT PROJECTS

Project/Location/Description	Identified Impacts	Status
16. Proctor Valley Road Improvement San Diego County Improvement of Proctor Valley Road from a dirt road to a two-lane light collector from Chula Vista city limits to SR-94.	Per the County of San Diego's Mobility Element of the General Plan, this roadway improvement was assumed to be completed under horizon year conditions. No information relative to potential environmental impacts was available at the time of this evaluation.	County Mobility Element Horizon Year Conditions
17.Otay Lakes Road and Honey Springs Road Intersection Realignment San Diego County Realignment of Otay Lakes Road and Honey Springs Road intersection to form a four-way intersection at SR-94.	Per the County of San Diego's Mobility Element of the General Plan, this roadway improvement was assumed to be completed under horizon year conditions. No information relative to potential environmental impacts was available at the time of this evaluation.	County Mobility Element Horizon Year Conditions

3.3 ENVIRONMENTAL CONSEQUENCES

The treatment of cumulative impacts for a project involves the use of a two-part analysis. The first part is to determine if a cumulative impact exists for the area and issue addressed. For example, *does cumulative development have the potential to have a significant impact to jurisdictional waters*? If the answer is yes, then the second part is to determine whether the project's contribution to the impact is considerable. If the answer is no, the analysis need not proceed any further.

The No Project Alternative would not contribute to any cumulative land use impacts because it would not change the existing physical environment or result in any action that could contribute to either positive or negative cumulative impacts within the RSAs. Where a positive or negative cumulative impact is attributed to any of the build alternatives below, it is sufficient for the purposes of CEQA to note that such cumulative impact contributions or benefits would not occur with the No Project Alternative. This assessment applies for each of the topics discussed below. Therefore, a less-than-considerable contribution is assessed to each cumulative topic for this alternative, and the No Project Alternative is not discussed further in this section.

Relative to discussion formatting, when potential environmental effects of the Non-Access Road Intersections and the Alternatives 1-3: Access Road Alignments vary from each other, they are separately discussed. When Proposed Project impact contributions to the cumulative condition would be similar for all five of the intersections and alternative road alignments, they are addressed under a single heading.

3.3.1 Land Use

The RSA of the cumulative land use analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because potential land use effects related to the Proposed Project would occur primarily within this area due to the location of the Proposed Project site.

Non-Access Road Intersections

Proposed Project elements are generally consistent with planning goals; potential inconsistencies provide the primary focus of the following discussion.

As stated in Section 2.1.1, the proposed improvements at the Non-Access Road Intersections would be consistent with the stated goals of the 2050 RTP. In terms of community planning, goals of the Valle de Oro Community Plan apply to the SR-94/Jamacha Boulevard and SR-94/Jamacha Road intersections, while the goals of the Jamul/Dulzura Subregional Plan apply to the SR-94/Steele Canyon Road, SR-94/Lyons Valley Road and SR-94/Maxfield Road intersections. Small footprint impacts to jurisdictional waters at the SR-94/Jamacha Boulevard intersection, as well as potential impacts to threatened and endangered species would be reduced to less-than-significant levels through measures identified in Sections 2.17.4 and 2.20.4 of this EIR, rendering their effects consistent with Plan goals for a Healthy Environment in the RTP and the Community Character, Open Space, and Conservation goals of the Valle de Oro Community Plan. Small footprint impacts to southern coast live oak riparian habitat at the SR-94/Lyons Valley Road intersection and to Diegan coastal sage scrub at the SR-94/Maxfield Road intersection would be reduced to less-than-significant levels through measures identified in Section 2.16.3 and would be consistent with the Jamul/Dulzura Subregional Plan Conservation Goal. Although the development of a second through-lane on the south side of SR-94 at the SR-94/Steele Canyon Road intersection would reduce the number of retail parking spaces for the adjacent commercial uses, this is not considered a substantial inconsistency with the community plan. The measures identified in Sections 2.16.3 and 2.17.4 would also provide appropriate compensatory mitigation for any natural habitat disturbance/loss in accordance with the MSCP and would therefore be consistent with the goals of the MSCP.

The Non-Access Road Intersections would have no impact on the RJER, HCWA, or San Diego NWR given that they are not adjacent to or within these boundaries, nor do they require any additional ROW from these areas.

When other projects are considered, the northwest section of the Jamul/Dulzura Subregion has recently felt residential growth pressures according to the San Diego County Jamul/Dulzura Subregional Plan adopted in August 2011. In addition, the San Diego County General Plan re-designations and rezoning approvals allowed for increased residential densities on the residential portion of the Peaceful Valley Ranch land. Although the cumulative development projects may contribute to land use impacts at varying levels, based on the above analysis, the Non-Access

Road Intersections would have no contribution and therefore would result in a less-than-cumulatively considerable contribution to land use impacts.

Alternatives 1-3: Access Road Alignments

Alternatives 1-2: Access Road Alignments would be consistent with the RTP. Alternative 3: Melody Road Access Alignment would be inconsistent with the RTP Healthy Environment Goal of promoting environmental sustainability due to the construction of a new and separate roadway from the highway where none currently exists and resulting conflicts with an established wildlife corridor.

The Goals of the Valle de Oro Community Plan do not apply to the Alternatives 1-3: Access Road Alignments. Alternatives 1-2: Access Road Alignments would be consistent with the stated General Plan/Jamul Dulzura Subregional Plan goals following implementation of measures identified in Section 2.6.4 relative to visual effects and Plan goals regarding retention of rural character. Alternative 3: Melody Road Access Alignment would be consistent with the stated General Plan/Jamul Dulzura Subregional Plan goal regarding retention of rural character following implementation of visual measures identified in Section 2.6.4, but would be inconsistent with several goals of the Jamul/Dulzura Subregional Plan. This alternative could cause disruption to an existing wildlife corridor, resulting in wildlife conflicts, which would be considered inconsistent with the Land Use Goal of retaining the existing land use of this area. In addition, it would be inconsistent with the Plan's Conservation Goal because placement of a new roadway through an undeveloped area that is currently used as a wildlife corridor by area wildlife would not constitute careful management of environmental resources. (The reader is referred, however, to Section 2.16, Natural Communities, and to Section 5.2 of this EIR for discussion of biological issues related to wildlife corridor effects.) Also, the Alternative 3 alignment from the JIV to Melody Road would connect a commercial establishment (the JIV Gaming Development Project) into a rural light collector street (Melody Road), which appears to be inconsistent with Jamul/Dulzura Subregional Mobility Goal 3; Policy #15 that provides direction to "(e)ncourage the elimination of safety hazards caused by direct access onto major arterial or collector streets. In particular, new commercial development shall have limited access to such roads." These plan inconsistencies are noted, and can be considered in weighing alternatives against each other, but do not constitute a physical land use impact and therefore are concluded to be less than significant.

Portions of the proposed Access Road Alignments are located within the MSCP, and construction of Alternatives 1-3: Access Road Alignments would impact natural habitats within the MSCP. Development within the MSCP is consistent with the MSCP Goals as long as compensatory mitigation for natural habitat disturbance/loss is performed as specified in the MSCP and BMO. With implementation of these measures, there would be no inconsistency with the Goals of the MSCP for the Access Road Alignments.

Alternatives 1-3: Access Road Alignments would have no impact on the San Diego NWR as they are not adjacent to or within the NWR, nor do they require any additional ROW from the NWR. They would all require ROW from either the RJER or the HCWA, and with several alignments, ROW would be required from both. The use of the strip of frontage land would be inconsistent with the RJER LMP and HCWA management, maintenance and restoration goals before mitigation because it would result in a reduction in land area of the reserve and land area of the Wildlife Area, respectively. Compensatory mitigation at a 3:1 ratio, however, would add new, higher-quality land to both the RJER and HCWA. The net effect would be an expansion of the RJER and HCWA in terms of acreage and an increase in habitat quality. Therefore, implementation of Alternatives 1-3: Access Road Alignments would not adversely affect nor be inconsistent with the RJER LMP or HCWA management, maintenance and restoration goals.

In summary, Alternative 3: Melody Road Access Alignment would be inconsistent with one RTP goal and three goals of the Jamul/Dulzura Subregional Plan. As noted, these plan inconsistencies can be considered in weighing alternatives against each other, but do not constitute a physical land use impact and therefore are concluded to be less than significant.

When other projects are considered, the northwest section of the Jamul/Dulzura Subregion has recently felt residential growth pressures according to the San Diego County Jamul/Dulzura Subregional Plan adopted in August 2011; in addition, the San Diego County General Plan re-designations and rezoning approvals allowed for increased residential densities on the residential portion of the Peaceful Valley Ranch land. Although the cumulative development projects may contribute to land use impacts at varying levels, based on the above analysis, the plan inconsistencies of Alternatives 1-3: Access Road Alignments would not constitute physical impacts and therefore Alternatives 1-3: Access Road Alignments would result in a less-than-considerable contribution to cumulative land use impacts. (The reader is referred to Section 2.16, Natural Communities, and to Section 5.13 of this EIR for discussion of footprint biological issues related to wildlife corridor effects.)

3.3.2 Community Character and Cohesion

The RSA of the cumulative community character and cohesion impacts analysis is defined by the community plan boundaries that encompass the Rancho San Diego and Jamul neighborhoods. These include the Valle de Oro Community Plan Area (CPA) and the Jamul/Dulzura Subregional Plan Area. This boundary is used because potential land use effects related to the Proposed Project would occur primarily within these communities due to the location of the Proposed Project site.

Non-Access Road Intersections

Impacts are based on the Proposed Project's effect on local residents' sense of belonging in relation to their neighborhood or the community at large, as well as anticipated physical changes

that alter the character of the community, such as access to community facilities and services, increasing urbanization associated with visual changes, and increases in community noise levels.

Construction-related impacts to the community could occur, but would be minimized by a TMP to control temporary traffic impacts and construction BMPs (such as regular watering, covering exposed dirt piles, construction noise controls, and construction site maintenance). In addition, these construction-related effects would be temporary in nature.

The proposed improvements to the Non-Access Road Intersections would not divide the community because (1) road widening would occur along existing road alignments that already traverse the community, and (2) the extent of widening would not substantially increase the width of the roadway segments such that there would be a perceived barrier (physical or psychological/social) within the community. Changes to intersections resulting in new visual elements such as retaining walls, transit facilities, and expansion of the existing transportation facilities were determined to be less-than-significant visual impacts. Noise-sensitive receptors in the vicinity of the non-access road intersection improvements were determined to not be significantly impacted by traffic noise.

When other projects are considered, the current construction of the JIV Gaming Development Project on the JIV Tribal Lands, and continued residential and commercial development throughout the Jamul community, contribute to the continued transformation of the rural Jamul environment to one of a more built urban environment. Although the cumulative development projects may contribute to community character and cohesion impacts at varying levels, based on the above analysis, the Non-Access Road Intersections would result in a less-than-considerable contribution to cumulative community character and cohesion impacts.

Alternatives 1-3: Access Road Alignments

Temporary construction effects associated with Alternatives 1-3: Access Road Alignments would be as described for the Non-Access Road Intersections above. Over the long term, the Proposed Project would not result in a new facility that would divide an existing community, or create new divisions or physical barriers within the community. While the Proposed Project would add elements such as retaining walls, dedicated turn-lanes, through-lanes, widened shoulders and multiple signals within a short traveling distance that would contribute to the increased urbanization of this part of the rural community to one of a more built environment, mitigation is identified in Section 2.6. Measures include the treatment of retaining walls, concrete barriers, and metal guard rails, as well as provision of highway plantings and replacement trees. These measures would reduce community character effects to less-than-significant levels. No long-term noise-related community impacts would occur. Transit and pedestrian use in the Proposed Project area would be improved with the construction of bus stops

and signal features that are associated with the access alternatives, resulting in a beneficial effect to the community.

When other projects are considered, the current construction of the JIV Gaming Development Project on the JIV Tribal Lands, and continued residential and commercial development throughout the Jamul community contribute to the continued transformation of the rural Jamul environment to one of a more built urban environment. Although the cumulative development projects may contribute to community character and cohesion impacts at varying levels, based on the above analysis, Alternatives 1-3: Access Road Alignments would result in a less-than-considerable contribution to cumulative community character and cohesion impacts.

3.3.3 Traffic and Transportation/Pedestrian and Bicycle Facilities

The RSA of the cumulative traffic analysis is defined as the traffic study area, which includes all the intersection and roadway segments affected by the Proposed Project. The intersections addressed within the traffic study area are listed in **Table 3-2**.

TABLE 3-2
TRAFFIC STUDY INTERSECTIONS

Intersection	Traffic Control (a)
1. SR-94 and Via Mercado	Signal
2. SR-94 and Jamacha Boulevard	Signal
3. SR-94 and Jamacha Road	Signal
4. SR-94 and Cougar Canyon Road	Signal
5. SR-94 and Steele Canyon Road	Signal
6. SR-94 and Lyons Valley Road	TWSC
7. SR-94 and Jefferson Road	Signal
8. SR-94 and Maxfield Road	OWSC
9. SR-94 and Melody Road	TWSC
10. SR-94 and Reservation Road	OWSC
11. SR-94 and Honey Springs Road	OWSC
12. SR-94 and Otay Lakes Road	OWSC
Notes: TWSC: Two-way Stop Controlled; ONSC: One-way Stop Controlled	

As stated in Section 2.4 of this EIR, all but one of the study intersections under Existing Baseline Conditions currently operate at LOS C or better during all peak periods analyzed. The exception is SR-94 (Campo Road) and Indian Spring Road/Lyons Valley Road, which currently operates at LOS E and F. Horizon Year (2035) No Build analysis indicates each of the intersections would

operate at LOS D, E, or F during one or more peak hours, which represents a degradation of traffic conditions from existing conditions.

Traffic and Transportation

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

The Section 2.4 traffic analysis addresses build and no build conditions for three scenarios: existing plus Proposed Project, near term (2015; near-term cumulative), and horizon year (2035; long-term cumulative). The Proposed Project would not generate any permanent additional traffic, but traffic would increase due to the JIV Gaming Facility and other development in the Proposed Project area.

During the construction of the Proposed Project, temporary traffic would be generated from hauling and construction related vehicles, deliveries and workers arriving and leaving the Proposed Project site. In addition, lane closures, lane shifts and/or flagging operations would be needed periodically during the construction sequence. A TMP would be prepared for this Proposed Project, and short-term construction traffic increases were determined to be less than significant.

With the implementation of the Proposed Project improvements under Existing with JIV Gaming Facility traffic and 2015 models, every intersection within the study area would operate at LOS D or better. Intersection analysis with ILV and peak hour arterial analysis similarly concluded Alternatives 1-3: Build Alternatives would result in less-than-significant traffic impacts.

Under Horizon Year (2035) traffic, all intersections would operate at equal or better LOS than before Proposed Project conditions with one exception: the intersection of SR-94 (Campo Road) and Jamacha Boulevard (LOS E weekday AM peak-hour, LOS F weekday PM peak-hour, and LOS D Saturday PM peak-hour). The proposed improvement at this intersection would increase the overall delay at this intersection when compared to the No Build scenario.

Traffic operations would be improved within the traffic study area overall compared to the No Build scenario. Worsening of traffic conditions at SR-94 and Jamacha Boulevard, however, would result in an adverse impact to traffic operations at this intersection. This Proposed Project effect would not be lessened by Proposed Project features or measures.

Intersection analysis with ILV indicates the Proposed Project would not result in any adverse operations at signalized intersections within the state ROW compared to the No Build scenario; however, the intersection of SR-94 and Jamacha Boulevard during the AM peak-hour would be approaching capacity. The ILV traffic analysis concluded that implementation of Alternatives 1-3: Build Alternatives would result in a less-than-significant impacts.

In conclusion, the traffic and transportation analysis concluded that proposed roadway improvements would improve operations within the study area overall. Worsening of traffic conditions at SR-94 and Jamacha Boulevard, however, would result in an adverse impact to traffic operations at this intersection under Horizon Year (2035) traffic. Because this effect would not be lessened by any other Proposed Project features or measures, the Proposed Project would contribute to traffic impacts at this location under Horizon Year (2035) traffic.

When other projects are considered, the impacts of traffic added by cumulative projects have already been incorporated into the traffic analysis. Therefore, the cumulative traffic analysis discussed in Section 3.2 for the Proposed Project represents the detailed analysis of cumulative environmental consequences which incorporates other cumulative projects for this issue.

The traffic analysis determined that at the intersection of SR-94 and Jamacha Boulevard under Horizon Year (2035) traffic, the delay would be increased with the Proposed Project compared to No Build conditions. However, the increases in delay would be generally less than 10 seconds, and the maximum increase in delay would be 27 seconds for all of the alternatives in the weekday AM peak. At the location and peak period of a 27-second delay increase, the total delay with the Proposed Project would be less than one minute. Because the Proposed Project would generally improve long-term traffic operations, and minimally increase delay at only one location, the incremental contribution of the Proposed Project to cumulative traffic impacts is determined to be less than considerable, and cumulative traffic impacts are determined to be less than significant.

Pedestrian and Bicycle Facilities

Paved pedestrian walkways do not exist in the Proposed Project limits with the exception of the east side of SR-94 just south of Jamacha Road for approximately 1,350 feet and two paved pedestrian waiting areas at the signalized corners of SR-94/Jamacha Boulevard and SR-94/Jamacha Road. Any pedestrian activity in other Proposed Project locations utilizes paved shoulders or adjacent dirt trails.

The Jamul-Dulzura community currently has one existing bikeway facility located on Lyons Valley Road from SR-94 to Jamul Drive. State Route 94 is part of the County of San Diego Bicycle Network System and on-highway bikeway facilities are proposed from Jamacha Boulevard to well south of the JIV. Currently, bike lanes are not provided on SR-94 and curbside parking is prohibited along both sides of SR-94 for the entire length of this highway within the Proposed Project limits. Bike lanes are provided and curbside parking is prohibited on Lyons Valley Road.

Non-Access Road Intersections

Sidewalks and pedestrian paths in the Proposed Project area would be temporarily impacted during construction. Any sidewalk or pedestrian path closures would be temporary in nature and pedestrian detours would be provided during the sidewalk or pedestrian path closures. Ultimately, any changes to the sidewalks in the vicinity of the affected roads would be ADA compliant. The traffic control set-ups for each phase of construction would accommodate bicycle traffic per the latest California Manual on Traffic Control Devices and Caltrans Traffic Operations approval. In the long-term, the Proposed Project would not preclude the future establishment of pedestrian walkways, transit stops or bike lanes.

When other projects are considered, pedestrian, transit, and bicycle facilities are generally lacking. However, new development may add facilities as part of their project features. Although the cumulative projects may contribute to pedestrian, transit, and bicycle facilities impacts at varying levels, based on the above analysis, the Non-Access Road Intersections would result in a less-than-considerable contribution to cumulative pedestrian, transit, and bike facilities impacts.

Alternatives 1-3: Access Road Alignments

Improvements along the area covered by the access road alternatives could temporarily interrupt traffic flow from Melody Road to SR-94 depending on the type of Willow Creek crossing, but no pedestrian walkways, transit stops or bike lanes exist at this location. Transit service would remain uninterrupted along SR-94 as no highway lane closure would occur during construction. The Proposed Project would not preclude the future establishment of pedestrian walkways, transit stops, or bike lanes.

When other projects are considered, pedestrian, transit, and bicycle facilities are generally lacking. Although the cumulative projects may contribute to pedestrian, transit, and bicycle facilities impacts at varying levels, based on the above analysis, Alternatives 1-3: Access Road Alignments would result in a less-than- considerable contribution to cumulative pedestrian, transit, and bike facilities impacts.

3.3.4 Utilities/Emergency Services

The RSA of the cumulative utilities/emergency services analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because potential utilities/emergency services effects related to the Proposed Project would occur primarily within this area due to the location of the Proposed Project site.

As discussed in Section 2.5 of this EIR, above- and below-ground utilities including electrical, water, drainage, natural gas, traffic signals, utility poles and telecommunication lines are located

within the Proposed Project limits. Underground sewage pipes are not located within the Proposed Project limits. Water is provided from the Otay Water District, SDG&E serves the Jamul area through one 12 kilovolt power line along SR-94, and Pacific Bell provides all basic telecommunications services, including cellular communications, to the Proposed Project area.

Regarding emergency services, the nearest CDF stations to the Proposed Project site are located in Jamul, Dulzura, and El Cajon. The closest fire station to the Proposed Project site is the new Jamul Station, located on SR-94 east of the JIV. The Jamul Fire Station allows for very quick emergency response times ranging from one to five minutes. The San Diego County Sheriff's Department provides general public safety and law enforcement service for the area of the Proposed Project site. The Jamul area currently consists of nine beat areas and is patrolled 24 hours a day by a one-person patrol unit from the Lemon Grove Station.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

With regards to underground utilities, USA provides a free "Dig Alert" service to all excavators in California. An excavator calls USA, and that call automatically notifies all USA members (utility service providers) that might have underground facilities at the excavator's work site. In response, the USA member(s) would mark or stake the horizontal path of underground facilities, provide information about the facilities, and/or give clearance to dig. This safety service protects the excavator from personal injury and prevents underground facilities from being damaged. The utility companies would be responsible for the timely removal or protection of any existing utility facilities located within the Jamul/Dulzura and Valle de Oro communities. The Joint Utilities Coordination Committee has developed procedures to assist cities, counties, and utilities in coordinating public improvement projects to alleviate scheduling and construction conflicts. Use of USA by the excavator, which is a standard construction practice, ensures that a less-than-significant impact to existing utilities would occur.

The long term electrical demand resulting from the Proposed Project would result from the new signals at the SR-94/Lyons Valley Road intersection, SR-94/Melody Road intersection and Proposed Project driveway. Each of these new signals would employ energy-saving LEDs that consume a finite, minimal amount of electricity. No other aspect of the Proposed Project would place a demand on this utility. Impacts to electrical demands would be less than significant. No significant demands on other types of utilities would result from the Proposed Project.

Although emergency service response times could be temporarily delayed through the Proposed Project area during construction, the required TMP would ensure that emergency services would not be significantly delayed or interrupted. No increase in emergency services related to growth in population or residential/commercial development would result from Alternatives 1-3: Build Alternatives. Upon Proposed Project completion, the proposed improvements to the

intersections/access road along SR-94 would serve to facilitate movement of emergency vehicles through the Proposed Project site, which is a beneficial effect of the Proposed Project.

When other projects are considered, utility and emergency services demands of development projects would likely be greater than for the Proposed Project, and demands of road improvement projects would be similar to the Proposed Project. It is reasonable to assume that all cumulative projects would make appropriate arrangements such that their utility and emergency services needs would be adequately served. Although the cumulative projects may contribute to utility and emergency services impacts at varying levels, based on the above analysis, the Proposed Project would result in a less-than-considerable contribution to regional utilities or cumulative emergency service impacts.

3.3.5 Visual Resources/Aesthetics

The RSA of the cumulative visual analysis is defined as the Proposed Project Access Alternatives areas and surrounding viewshed (see Section 2.6 Visual Resources for an explanation of "viewshed"). This boundary is used because changes in visual resources would be most noticeable in the vicinity of the Proposed Project as geographic barriers typically prevent a visual resources effect from being perceived over large distances. Therefore, the cumulative visual resources effects of Alternatives 1-3 would be limited to the Proposed Project-specific viewshed.

Non-Access Road Intersections

Temporary visual impacts including impacts from temporary structures, contractor staging areas, dust, night lighting, hauling of materials, and detours would occur during the Proposed Project construction. The duration of construction would be approximately 18 to 24 months. Construction impacts would cease following completion of the Proposed Project. A less-than-significant visual resource impact would result from construction because of the changing and temporary nature of the construction activities.

As noted in Section 2.6 of this EIR, construction of the proposed changes to the five non-access road intersections would result in a greater expanse of paving and graded slopes, resulting in the permanent loss of landscape and a more urban appearance. For each of the five locations, however, the collective change to existing visual character and quality would be low to moderate, and viewer response would be low to moderate, resulting in visual impacts that are considered less than significant.

When other projects are considered, residential and commercial development throughout the Jamul community is continuing, contributing to the transformation of the rural scenery to one of a more built urban environment. Recent development including the Peaceful Valley Ranch development on the east side of SR-94, and the JIV Gaming Development Project currently

being constructed on the JIV Tribal Lands and other cumulative projects contribute to the replacement of the existing natural landscape features that provide transition from the Jamul community to the rural open space area of Jamul Valley to the south with more urban features. Although the cumulative projects may contribute to visual impacts to varying levels, based on the above analysis, the Non-Access Road Intersections would result in a less-than-considerable contribution to cumulative visual impacts.

Alternatives 1-3: Access Road Alignments

Temporary construction impacts would be similar to those described for the Non-Access Intersections. Long term, the proposed access road alternatives would impact scenic views, as the Proposed Project is located at the edge of the existing rural community and rural open space. The implementation of the Proposed Project would change the rural visual character of the view by introducing new built features within the viewshed, including expanded or new roadway paving, guard rails, safety railing, retaining walls with concrete barriers, and graded slopes. The Proposed Project features also would cause the permanent loss of color and textural contrast in the viewshed by introducing gray, smooth built forms. These manufactured textures and monotone color palettes would replace the natural irregular texture and earth tones of the native landscape. The changes to existing visual resources and viewer responses to those changes initially would result in potentially significant visual resource impacts for each of the access road alternatives. Mitigation measures are specified in Section 2.6 for Alternatives 1-3: Access Road Alignments. These include the visual treatment of retaining walls, concrete barriers, metal guard rails, highway plantings, and replacement trees, and would mitigate impacts of Alternatives 1-3: Build Alternatives to a less-than-significant level.

When other projects are considered, cumulative projects are generally contributing to the replacement of the existing natural landscape features that provide transition from the Jamul community to the rural open space area of Jamul Valley to the south with more urban features. Although the cumulative projects may contribute to visual impacts at varying levels, based on the above analysis, the access road alternatives would result in a less-than-considerable contribution to cumulative visual impacts with implementation of the mitigation measures specified in Section 2.6.

3.3.6 Hydrology and Floodplain

The RSA of the cumulative analysis is defined as the drainage basin boundaries identified for the Access Road Alignments and the Non-Access Road Intersections. The Proposed Project areas ultimately flow to the San Diego Bay through two separate watersheds: the Otay River and Sweetwater River. The affected watershed for the SR-94/Jamacha Road intersection includes an unnamed tributary within the Middle Sweetwater River watershed which flows to the Sweetwater Reservoir before reaching San Diego Bay. The remaining Proposed Project areas

are within the Willow Creek watershed which flows to Jamul Creek and to the Lower Otay Reservoir before ultimately reaching San Diego Bay.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As discussed in Section 2.8 of this EIR, during construction, the channel and drainage improvements required include clearing, grading, widening of the existing roadway for expanded intersections, and other modifications to the existing cross culverts underneath SR-94. These activities have the potential to change natural drainage patterns. However, because of the relatively small scale of intersection and access road modifications, the minor amounts of additional impervious surface added, and the use of construction BMPs, Proposed Project-related changes in existing drainage patterns during construction would be less than significant.

Additionally, the Proposed Project design includes biofiltration swales as BMPs to reduce the flow rate and velocity of surface water. The biofiltration swales are designed to allow surface water to collect, filtrate, and infiltrate within the swale. Riprap (layered rock) energy dissipaters are other BMPs that are included in the Proposed Project to reduce the velocity of surface water at its entry point into the drainage channel or culvert. Furthermore, the anticipated flow rate and velocity of surface water during a 100-year storm event is anticipated to be substantially the same as the existing flow conditions. None of the Proposed Project features has been identified as having the potential to adversely affect or hinder surface water such that it would result in a significant increase in surface water elevation during a 100-year flood event. Potential operational impacts of the Proposed Project would be less than significant.

When other projects are considered, runoff characteristics in the watersheds affected by the Proposed Project could be altered when impervious surfaces replace natural vegetation or soils. Runoff changes may increase stream volumes, increase stream velocities, increase peak discharges, shorten the time to peak flows, and lessen groundwater contributions to stream base-flows during non-precipitation periods. Urban areas also have substantial sources of non-point source pollution that can affect regional water quality when examining the entire watershed contribution to receiving waters. Storm water discharges are of concern in managing surface water quality. Pollutants that accumulate in the dry summer months such as oil and grease, asbestos, pesticides, and herbicides, create water quality problems due to their presence in high concentrations during the first major autumn storm event. Although the cumulative projects may contribute to cumulative hydrology and floodplain impacts at varying levels, based on the above analysis, the Proposed Project would result in a less-than-considerable contribution to cumulative hydrology and floodplain impacts.

3.3.7 Water Quality and Storm Water Runoff

The RSA of the cumulative analysis is defined as the drainage basin boundaries identified for the Access Road Alignments and the Non-Access Road Intersections, as described above under Hydrology and Floodplain.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As described in Section 2.9 of this EIR, potential sources of temporary surface water impacts during construction include construction materials, contaminants in and near the existing roadway, vehicle leaks, traffic accidents, and illegal dumping. Temporary construction site storm water BMPs would be implemented to minimize or eliminate chemical releases to ground and surface waters. Water quality impacts due to clearing and grading activities would be minimized with the containment of potential pollutants before they come in contact with off-site drainages. Under the requirements of the General Permit for Storm Water Discharge Associated with Construction Activities, a SWPPP would be required to be prepared which would contain BMPs specifically designed to address construction water quality impacts, including erosion. Potential construction impacts on water quality and storm water runoff would be less than significant.

Surface water pollutants originating from vehicles (e.g., tire and brake lining wear, litter, and spills during vehicle accidents) are expected to be present in surface water runoff associated with the roadway improvements. Other pollutant sources potentially associated with the Proposed Project in the long-term include sediment, heavy metals, organic compounds, trash and debris, and oil and grease. These pollutants already exist in the area as a result of the existing roadways. The Proposed Project includes the implementation of the BMPs listed in 2.9.4 as part of the Proposed Project and as part of compliance with existing federal and state law, as well as Caltrans requirements. When designed to Caltrans standards, these BMPs have been demonstrated to be effective in treating storm water runoff and removing and reducing the amount of pollutants in downstream water bodies. Potential operational impacts on water quality and storm water runoff would be less than significant.

When other projects are considered, water quality and storm water runoff in the watersheds affected by the Proposed Project could be adversely impacted when impervious surfaces replace natural vegetation or soils. All of the cumulative projects can reasonably be expected to implement similar water quality control measures (BMPs) as the Proposed Project in order to reduce project-specific impacts. Although the cumulative projects may contribute to cumulative hydrology and floodplain impacts at varying levels, based on the above analysis, the Proposed Project would result in a less-than-considerable contribution to cumulative water quality and storm water impacts.

3.3.8 Geology/Soils/Seismic/Topography

The RSA for land resources (i.e., geology, soils, seismicity, and topography) is defined as the Proposed Project area due to the fact that effects would occur to (and not from) the proposed development areas and/or are specific to on-site conditions related to seismic ground acceleration and liquefaction, as well as landslide/slope stability and expansive soils.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As discussed in Section 2.10 of this EIR, seismic events within the Proposed Project limits could cause severe ground shaking and acceleration forces that could cause slope failure. Effective design measures exist and would be incorporated to minimize effects of seismic shaking, such as constructing earth fills to partially absorb underlying ground movements; isolating foundations from the underlying ground movements; and designing strong, ductile (malleable) foundations that can accommodate some deformation without compromising the functionality of the structure. The GDR would include a plan with specific provisions to avoid or minimize damage from ground movement, and the specific performance standards, based on the prevailing design standard (e.g., Highway Design Manual, California Building Code, etc.) that must be met for work to continue in that area. Potential impacts from ground shaking and acceleration would be less than significant.

The potential for liquefaction at the Proposed Project areas is considered low due to the presence of relatively shallow dense materials such as silty sand and granitic rock; and the lack of near-surface groundwater encountered during boring tests. The underlying soils do not contain high percentage clay soils. The potential for expansive soils is therefore also considered low. While some cut slopes would be noticeable after construction is complete, the major topographical features of the Proposed Project area such as hilltops, drainages, and steep slope areas (i.e., those areas greater than 25% in slope and 50 feet in height) would be preserved. Soils and topography impacts would be less than significant.

When other projects are considered, potential hazards would be addressed using standard geotechnical measures to comply with existing requirements, and/or site-specific design and construction efforts. Addressing potential seismic-related impacts to manufactured slope and retaining wall stability, for example, would be achieved through identified design and construction measures such as incorporating applicable seismic criteria and implementing slope/wall stabilization efforts (e.g., appropriate landscaping, drainage and footings). All of the cumulative projects can reasonably be expected to implement appropriate geotechnical measures in order to avoid project-specific impacts, similar to the Proposed Project. Cumulative geology, soils, seismic, and topography impacts are therefore determined to be less than significant.

3.3.9 Hazardous Waste/Materials

The RSA for hazardous waste/materials issues within the cumulative impact context is defined as the Proposed Project area due to the fact that effects would be site-specific.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As discussed in Section 2.11 of this EIR, no evidence of buried storage tanks or soil or groundwater contamination or other recognized environmental conditions was found during environmental site assessments recently performed for the Proposed Project except at SR-94/Steele Canyon Road. At this intersection, contamination from diesel, gasoline, and gasoline additives in both soil and groundwater was discovered. Groundwater under the Proposed Project limits is currently contaminated from these petroleum product releases. Soil under the Proposed Project limits may or may not be contaminated from these petroleum product releases. In addition, aerially deposited lead and treated wood waste may or may not be present within the Proposed Project limits.

Proposed Project-specific hazardous material impacts for Alternatives 1-3: Build Alternatives would be avoided or reduced to less-than-significant levels through conformance with established regulatory requirements and implementation of identified mitigation measures such as additional testing and remediation (e.g., removal) as necessary, in accordance with applicable local, state and federal regulations.

When other projects are considered, many state and federal laws govern the generation, treatment, storage and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health and land use. All of the cumulative projects can reasonably be expected to implement appropriate hazardous waste/materials control measures in order to avoid project-specific impacts, similar to the Proposed Project. Cumulative hazardous waste/materials impacts are therefore determined to be less than significant.

3.3.10 Air Quality

The RSA used for the air quality analysis is the San Diego Air Basin (SDAB), which is coincident with the boundaries of San Diego County.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As discussed in Section 2.12 of this EIR, Caltrans utilizes federal conformity regulations for CEQA compliance, which requires analysis of construction impacts for projects when construction activities last for more than five years at one location. Construction of the Proposed Project alternatives, including the non-access intersection improvements, is not expected to last

more than one year. In addition, no local hot spot is anticipated. Caltrans Standard Specifications Section 14-9 measures would be incorporated into the Proposed Project. Less-than-significant construction impacts related to regional emissions and local emissions would result.

Odors associated with the Proposed Project construction would be temporary, would disperse rapidly with distance from the source, and would not affect a substantial number of people. As a result, short-term construction odor impacts at off-site land uses would be less than significant.

Construction under Alternatives 1-3 would occur over a much shorter period of time than the 70-year exposure period on which health risks assessments are based; use of off-road heavy-duty diesel equipment would be temporary, and diesel PM emissions would disperse rapidly with distance from the source. Construction-related TAC emissions therefore would not expose sensitive receptors to substantial concentrations of TACs and impacts would be less than significant.

The Proposed Project would not result in long-term vehicular related emissions as the Proposed Project does not itself increase traffic. Alternative 3: Melody Road Alignment would result in a re-routing of traffic at the SR-94/Melody Road intersection; however, this intersection would operate with an acceptable LOS and would not trigger a localized CO impact. Overall, the Proposed Project does not meet the criteria for being a project of air quality concern, has been determined to generate minimal air quality impacts for CAA criteria pollutants, and has not been linked with any special MSAT concerns. Long-term operation impacts of the Proposed Project on air quality would be less than significant.

When other projects are considered, development and increasing traffic in the region continue to occur, resulting in the potential for emissions to exceed planned estimates and/or contribute to a violation of standards, for a substantial increase in pollutant levels to occur, or for sensitive receptors to be exposed to substantial pollutant concentrations. Although the cumulative projects may contribute to cumulative air quality impacts at varying levels, based on the above analysis, the Proposed Project would result in a less-than-considerable contribution to cumulative air quality impacts.

3.3.11 Noise

The RSA of the cumulative noise analysis is restricted to the Proposed Project limits and land immediately adjacent to the Proposed Project limits because Proposed Project-related construction and operational noise would be confined to this location. A wider area is not required since there would be no increases in traffic noise resulting from the Proposed Project along SR-94 segments.

Non-Access Road Intersections

As described in Section 2.14 of this EIR, construction equipment may generate maximum noise levels of 85 to 90 dBA at a distance of 50 feet during most construction activities. The nearest noise-sensitive receiver is located approximately 100 feet from Proposed Project construction activity at the SR-94/Steele Canyon Road intersection. At this distance, construction noise levels would attenuate to 68 dBA Leq or less, which also would be consistent with the County's construction noise ordinance. No significant noise impact would occur.

Proposed Project construction is not expected to utilize any pile driving or blasting during construction. The most likely source of vibration during the Proposed Project construction would be a vibratory roller. If used, the vibratory roller would operate at a distance greater than 25 feet from the nearest occupied residence. Therefore, although vibration may be perceptible by nearby residences, temporary impacts associated with the vibratory roller (and other potential equipment) would be less than significant.

The Proposed Project itself would not generate trips; however, the reconfiguration of the lanes at the five non-access road intersections may decrease the distance from the roadway to surrounding receivers. The additional lanes at the intersections would remain within the existing right-of-way and would require the adjustment of existing lanes. In 2035, the traffic noise modeling noise levels would range from 33 to 77 dBA Leq, with the difference between existing and 2035 ranging from 2 to 5 dBA. Changes in noise levels of this order would be barely perceptible to the average human ear. Therefore, the Non-Access Road Intersections would result in a less than significant noise impact.

When other projects are considered, residential and commercial development throughout the Jamul community is continuing, contributing to the transformation of the rural area to a more built urban environment. As traffic from commercial and residential development increases, noise will continue to increase. Although the cumulative projects may contribute to cumulative noise impacts at varying levels, based on the above analysis, the Non-Access Road Intersections would result in a less-than-considerable contribution to cumulative noise impacts.

Alternatives 1-3: Access Road Alignments

The nearest receiver to the access road improvements for Alternatives 1 through 3 is a residence approximately 60 feet from the center of proposed construction activities at the north end of the Proposed Project limits. Hourly construction noise levels at this distance would attenuate to 73 dBA Leq or less. Therefore, no construction-related noise impacts would occur. Vibration impacts from possible use of a vibratory roller during the Proposed Project construction of the access road alternatives would be less than significant, as discussed above.

With long-term implementation of the access road alternatives, future noise levels would range from 44 to 65 dBA Leq at the receivers with a 0 to +9 dBA change in noise levels from existing levels due to differences in the alternatives. The 9 dBA change is located at Receiver 21, and would occur only with Alternative 3: Melody Road. Changes in noise levels from 0-3 dBA would not be perceptible to the average human ear and would not be considered a significant impact. However, an increase of 9 dBA would be considered a significant impact. If Alternative 3: Melody Road is chosen as the Preferred Alternative, coordination will take place with the homeowner to determine a feasible solution to the noise impact, and to reduce this impact to less than significant with mitigation.

When other projects are considered, residential and commercial development throughout the Jamul community is continuing, contributing to the transformation of the rural area to a more built urban environment. As traffic from commercial and residential development increases, noise will continue to increase. Although the cumulative projects may contribute to cumulative noise impacts at varying levels, based on the above analysis, the access road alternatives would not contribute to cumulative construction noise impacts. Also, Alternatives 1 and 2 would result in a less-than-considerable contribution to cumulative operational noise impacts. However, Alternative 3 would result in a cumulatively considerable contribution to cumulative operational noise impacts. As noted above, if Alternative 3: Melody Road is chosen as the Preferred Alternative, coordination will take place with the homeowner to determine a feasible solution to the noise impact, and to reduce this significant project-specific and cumulative noise impact to less than significant with mitigation.

3.3.12 Energy

The RSA of the cumulative energy analysis is defined as the service area for SDG&E because they would be the energy service provider to the Proposed Project site. While energy demand would occur outside this area, the localized area of potential Proposed Project impacts relative to the overall size of the SDG&E service area would result in retention of Proposed Project-related cumulative effects within this service area.

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As described in Section 2.15 of this EIR, the short-term use of energy to improve the Proposed Project roadways/intersections would result in long-term energy savings through the more efficient flow of traffic. The savings in operational energy requirements would offset the energy used for construction and would result in a net savings in energy use in the long term.

When other projects are considered, direct and indirect energy consumption continue to increase as population and the economy grow. The majority of existing energy consumption is traffic related. Demand stimulates fossil fuel production, but there is also a stimulus for energy production from renewable sources. Although the cumulative development projects may

contribute to energy impacts at varying levels, based on the above analysis, when balancing energy used during construction and operation against energy saved by relieving congestion and other transportation efficiencies, the Proposed Project would result in a less-than-considerable contribution to cumulative energy impacts.

3.3.13 Natural Communities

The RSA of the cumulative natural community analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because potential natural community effects related to the Proposed Project would occur within this area (around the Proposed Project site).

Non-Access Road Intersections

As described in Section 2.16 of this EIR, most intersection Proposed Project work would occur in areas that are paved, landscaped, or barren, and that have no natural habitat (with no associated impacts). The SR-94/Jamacha Road Intersection work would affect a small amount of aquatic habitat; this impact is discussed under Wetlands. Vegetation clearing at the SR-94/Lyons Valley Road intersection would degrade southern coast oak riparian forest. This impact would be mitigated by preserving riparian habitat or purchasing mitigation credits in compliance with the BMO. The SR-94/Maxfield Road Intersection work would affect two small areas of Diegan coastal sage scrub. This impact would be mitigated to a less-than-significant level by measures including restoration, revegetation, protection with an ESA, and either in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank), or deed restriction of qualified lands.

When other projects are considered, continuing development increases urbanization, which can result in additional loss of natural communities in the region. The San Diego County's MSCP was designed to mitigate for the cumulative loss of open space and natural habitats. The MSCP focuses development in appropriate areas and concentrates wildlife preserves in areas of the highest-habitat value. Furthermore, the MSCP compensates for the cumulative loss of open space and natural habitat caused by land development through the creation and expansion of nature preserves using mitigation ratios that are equal to or greater than one-to-one ratio. Due to surrounding uses (including abutting sensitive habitats), however, mitigation is not always feasible in the area of the direct impact. Cattle grazing has severely degraded some natural communities. Wildlife movement corridors link remaining areas of functional wildlife habitat that are separated primarily by human developments or by natural barriers such as rugged terrain and abrupt changes in vegetation cover. Wilderness and open lands have been fragmented by urbanization, which can disrupt migratory species and separate interbreeding populations. Although the cumulative projects may contribute to cumulative natural communities impacts at varying levels, based on the above analysis, the Non-Access Road Intersections would result in a less-than-considerable contribution to cumulative natural communities impacts.

Alternatives 1-3: Access Road Alignments

All three of the access road alternatives would have temporary and permanent impacts to natural communities. These impacts would be mitigated to less-than-significant levels by measures including restoration, revegetation, protection with an ESA, and complying with the land preservation requirements according to ratios specified in the BMO (detailed in Section 2.16.3 of this EIR) such that there would be a net gain in preserved open space and natural habitats.

Construction of Alternative 3: Melody Road Alignment (only) would implement a new road in a sensitive area designated as Hardline Preserve in the San Diego County MSCP, which would cause habitat fragmentation and restrict wildlife movement and reduce the utility of Willow Creek as a wildlife corridor. This is a significant impact for Alternative 3 only and is considered to be unavoidable.

When other projects are considered, continuing development increases urbanization, which can result in additional loss of natural communities in the region. Although the cumulative projects may contribute to cumulative natural communities impacts at varying levels, based on the above analysis, Alternatives 1-2: Access Road Alignments would result in less-than-considerable contributions to cumulative natural communities impacts. Alternative 3 would result in a less-than-considerable contribution to cumulative natural communities impacts for most elements, but would result in a considerable contribution based on the potential for wildlife corridor impacts.

Cumulative projects that are in the vicinity of Willow Creek and the 87-acre parcel crossed by proposed Alternative 3 would have the potential to add cumulatively to the wildlife corridor impact. The only such project is No. 1: JIV Gaming Project, which is currently under construction. The gaming facility encompasses 203,000 square feet on a 6.2-acre reservation held in trust by the United States for the benefit of the JIV. The western portion of the JIV Tribal Lands contains a Community Center, Tribal Office, and associated surface parking. The remainder of the Tribal Lands area is currently being developed for the JIV Gaming Project. The environmental document for the gaming facility concluded that the design of the gaming facility would completely avoid the Willow Creek channel and the riparian forest associated with the channel and would therefore have a less-than-significant impact on wildlife corridors.

Land south of the JIV Tribal Lands is not expected to see future development given that it is included in the RJER (west of SR-94) and HCWA (east of SR-94) owned and operated by CDFW. This land south of the JIV Tribal Lands also contains a General Plan land use designation of Open Space Conservation, which would confirm its future open space/conservation status. The four-acre parcel located northwest of SR-94/Reservation Road is designated Semi-Rural Residential; however, the future use is expected to remain an access road parcel for the JIV Tribal Lands.

Other developments could occur on vacant Semi-Rural Residential designated land that exists on the west side of SR-94 north of Melody Road, which encompasses the Willow Creek riparian corridor, but no approved or pending developments have been identified. The 87-acre parcel to the south between Melody Road and the JIV Tribal Lands is classified as Hardline Preserve, Pre-Approved Mitigation, and Take-Authorized Areas. No developments exist on the 87-acre parcel, and no approved or pending developments have been identified with the exception of proposed Alternative 3 of the Proposed Project.

South of Melody Road/Peaceful Valley Ranch Road on the east side of SR-94, future land uses could consist of residential/equestrian uses in the Peaceful Valley Ranch development recently approved by San Diego County. As of now, the only new development consists of an improved Peaceful Valley Ranch Road and a fire station for the Rural Fire Protection District. Being on the east side of SR-94, future development in this area, including the Peaceful Valley Ranch development, would not contribute to the Willow Creek wildlife corridor impacts of Alternative 3 of the Proposed Project.

Based on the above analysis, Alternative 3 would result in a cumulatively considerable contribution to cumulative wildlife corridor impacts. This is a significant project-specific and cumulative impact for Alternative 3 only and is considered to be unavoidable.

3.3.14 Wetlands

The RSA of the cumulative wetlands analysis is defined as the drainage basin boundaries identified for the Access Road Alignments and the Non-Access Road Alignments, as described above under Hydrology and Floodplain.

Non-Access Road Intersections

As described in Section 2.17 of this EIR, only the SR-94/Jamacha Road Intersection Proposed Project has a water feature that is subject to USACE jurisdiction under the CWA: an intermittent stream named "Jamacha Channel" and its associated in-stream wetlands. For this non-access road intersection only, impacts to jurisdictional waters would occur from installation of a new retaining wall. Measures specified in Section 2.17.4 of this EIR would reduce the Proposed Project temporary and permanent jurisdictional water impacts at SR-94/Jamacha Road to a less-than-significant level. At SR-94/Lyons Valley Road Intersection, impacts to waters of the State would occur from trimming of riparian vegetation, because waters of the State extend to the outer edge of riparian vegetation. The avoidance, minimization and/or mitigation measures listed in Section 2.17.4 would reduce the impact to a less-than-significant level.

When other projects are considered, the cumulative loss of wetlands and other waters of the U.S. is an impact of national concern, as the majority of wetlands have been developed, and many rivers have experienced channelization and other hydromodifications. Due to surrounding uses

(including abutting sensitive habitats), mitigation is not always feasible in the area of the direct impact. In the study area, the Willow Creek drainage has a high gradient and scouring has denuded in-channel and riparian vegetation. Riverine marshes located within the ordinary high water mark of Willow Creek within the 87-acre parcel affected by Alternative 3 are severely degraded from use by cattle. Although the cumulative projects may contribute to cumulative wetlands and other waters impacts at varying levels, based on the above analysis, the Non-Access Road Intersections would result in a less-than-considerable contribution to cumulative wetlands and other waters impacts.

Alternatives 1-3: Access Road Alignments

Construction of any of the Access Road alternatives would require the placement of fill or structures in Willow Creek to extend the culvert bridge at Melody Road. The exception is Alternative 2: Option 1, which will employ a bottomless culvert at Melody Road; this will avoid placing any new fill in the Willow Creek channel. In addition, the Alternative 3: Melody Road Access Alignment would require three new channel crossings on the 87-acre parcel to build the new access road. Measures specified in Section 2.17.4 of this EIR would reduce the temporary and permanent jurisdictional water impacts to less-than-significant levels and would result in a net gain in protected water resources, either through restoration or land dedication, or both.

When other projects are considered, the cumulative loss of wetlands and other waters of the U.S. is an impact of national concern, as the majority of wetlands have been developed, and many rivers have experienced channelization and other hydromodifications. Although the cumulative projects may contribute to cumulative wetlands and other waters impacts at varying levels, based on the above analysis, Alternatives 1-3: Access Road Alignments would result in a less-than-considerable contribution to cumulative wetlands and other waters impacts.

3.3.15 Plant Species

The RSA of the cumulative plant species analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because these effects related to the Proposed Project would occur within this area due to the location of the Proposed Project site.

Non-Access Road Intersections

As described in Section 2.18 of this EIR, only one special status plant species was detected within any of the Non-Access Road Intersection Proposed Project limits: several stands (approximately 2,250 square feet) of Palmer's goldenbush occurs within the SR94/Jamacha Road Intersection Improvement area. This impact would be reduced to a less-than-significant level through measures specified in Section 2.18.4 of this EIR. No impacts to sensitive plant species would occur from construction of any the other intersection improvements.

When other projects are considered, a large portion of the study area is currently covered by the RJER, HCWA and San Diego NWR (approximately 19,530 acres), which all serve to preserve sensitive plant species. In addition to land already within the preservation areas, the San Diego NWR LMP has the potential to increase holdings by an additional 32,330 acres, which if realized would result in a preservation of approximately 52,000 acres of land. In addition to these lands, San Diego County's MSCP further restricts land development (especially the Hardline Preserve designation) outside of these lands. However, even with these vast preservation holdings, land subject to cumulative development outside of these preservation areas could result in short and long term impacts to listed plant species in the region. Within the Jamul/Dulzura and Valle de Oro communities, the majority of lands are urbanized or developed, or have degraded habitats due to the spread of exotic species and intensive land use practices, such as cattle grazing. Although the cumulative projects may contribute to cumulative plant species impacts at varying levels, based on the above analysis, the Non-Access Road Intersections would result in no contribution to cumulative plant species impacts.

Alternatives 1-3: Access Road Alignments

No special status plant species were detected within the Alternative 1-2 Access Road Alignments Proposed Project limits; therefore, no impact (and no contribution to cumulative impacts) would result from the construction of these alternatives. Approximately 24-square feet of Palmer's goldenbush on the 87-acre parcel would be impacted by construction of Alternative 3: Melody Road Access Alignment. This impact would be reduced to a less-than-significant level through measures specified in Section 2.18.4 of this EIR.

When other projects are considered, land subject to cumulative development outside of the preservation areas discussed above could result in short and long term impacts to listed plant species in the region. Although the cumulative projects may contribute to cumulative plant species impacts at varying levels, based on the above analysis, Alternatives 1 and 2 would result in no contribution to cumulative plant species impacts. In addition, Alternative 3: Melody Road Access Alignment would result in a less-than-considerable contribution to cumulative plant species impacts with implementation of the measures specified in Section 2.18.4 of this EIR.

3.3.16 Animal Species

The RSA of the cumulative animal species analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because potential animal species effects related to the Proposed Project would occur within this area (i.e., the areas surrounding the Proposed Project site).

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As discussed in Section 2.19 of this EIR, none of the wildlife surveys detected any special-status animal species within the Proposed Project limits. Therefore, no direct impacts to special-status animal species are expected from Proposed Project construction or Proposed Project operation.

When other projects are considered, even with the vast preservation holdings of the RJER, HCWA and San Diego NWR, land subject to cumulative development outside of these preservation areas could result in short- and long-term impacts to listed animal species in the region. Although the cumulative projects may contribute to cumulative animal species impacts at varying levels, based on the above analysis, the Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments would result in no contribution to cumulative animal species impacts.

3.3.17 Threatened/Endangered Species

The RSA of the cumulative threatened and endangered species analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because potential threatened and endangered species effects related to the Proposed Project would occur within this area (i.e., the areas surrounding the Proposed Project site).

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As described in Section 2.20 of this EIR, botanical surveys of the Proposed Project limits did not detect threatened or endangered plant species within the Proposed Project limits. No critical habitat for any federally listed species occurs within, or adjacent to, the Proposed Project limits. General wildlife surveys, protocol surveys for California coastal gnatcatcher, protocol surveys for Quino checkerspot butterfly and Hermes copper butterfly did not detect any threatened or endangered species. Construction of the intersection improvements would not impact Quino checkerspot butterfly or Hermes Copper butterfly or their potential habitats because there is no suitable habitat for these species. Similarly, construction of Alternatives 1-2 would not impact Quino checkerspot butterfly or Hermes Copper butterfly because there is no suitable habitat for these species.

Construction of the Alternative 3: Melody Road Access Alignment on the 87-acre parcel would impact approximately 16-square feet of dwarf plantain, which is potential habitat for Quino checkerspot butterfly, and approximately 8-square feet of spiny redberry, which is potential habitat for Hermes copper butterfly. Potential construction impacts would be avoided through pre-construction protocol surveys to ensure that endangered or threatened species have not migrated onto the Proposed Project sites. In addition, a monitoring biologist (approved by CDFW) would be on site during initial clearing and grubbing of habitat, and Proposed Project construction within 300 feet of environmentally sensitive habitat, to ensure compliance with all

applicable mitigation measures. Other measures would also be implemented, including acquiring preserve lands and transplanting the impacted stands of dwarf plantain and spiny redberry to these lands. These measures detailed in Section 2.20.4 of this EIR would result in less-than-significant impacts.

When other projects are considered, even with the vast preservation holdings of the RJER, HCWA and San Diego NWR, land subject to cumulative development outside of these preservation areas could result in short- and long-term impacts to threatened and endangered species in the region. Although the cumulative projects may contribute to cumulative threatened and endangered species impacts at varying levels, based on the above analysis, the Non-Access Road Intersections and Alternatives 1-2: Access Road Alignments would result in no contribution to cumulative threatened and endangered species impacts. Alternative 3: Melody Road Access Alignment would result in a less-than-considerable contribution to cumulative threatened and endangered species impacts with implementation of measures detailed in Section 2.20.4 of this EIR.

3.3.18 Invasive Species

The RSA of the cumulative invasive species analysis is defined as the Jamul/Dulzura and Valle de Oro communities. This boundary is used because potential invasive species effects related to the Proposed Project would occur within this area (i.e., the areas surrounding the Proposed Project site).

Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments

As described in Section 2.21 of this EIR, construction of Alternatives 1-3: Build Alternatives has the potential to introduce or encourage the spread of invasive species via construction equipment that can transport weed seeds or the use of erosion control products containing weed seed. Measures specified in Section 2.21.4 of this EIR, including not using invasive species in landscaping and inspecting construction equipment for invasive species before entering or leaving the construction and mitigation sites, would reduce potential Proposed Project-related invasive species impacts to less-than-significant levels.

When other projects are considered, continuing development has the potential to introduce or encourage the spread of invasive species via construction activities that can transport weed seeds or use of erosion control products that contain weed seed. This issue is typically addressed by complying with the Executive Order on Invasive Species (for Caltrans projects), implementing certified weed free erosion control techniques involving, inspecting construction/ mitigation sites and equipment for evidence of plant residues (seeds, twigs, leaves, etc.) and creating/implementing habitat restoration plans for natural areas impacted by construction activities. Invasive species already dominate the plant community compositions in the vicinity of the Access Road Alignments and the Non-Access Road Intersections. Although the

cumulative projects may contribute to cumulative invasive species impacts at varying levels, based on the above analysis, the Non-Access Road Intersections and Alternatives 1-3: Access Road Alignments would result in a less-than-considerable contribution to cumulative invasive species impacts with implementation of the measures specified in Section 2.21.4 of this EIR.

3.3.19 Summary

A summary of the Proposed Project contribution to cumulative impacts for each environmental issue discussed in this cumulative analysis is presented in **Table 3-3**.

TABLE 3-3
SUMMARY OF PROPOSED PROJECT CONTRIBUTION TO CUMULATIVE IMPACTS

Environmental Issue	Contribution to Cumulative Impacts	
	Non-Access Road Intersections	Alternatives 1-3: Access Road Alternatives
Land Use	Less than considerable	Less than considerable
Community Character and Cohesion	Less than considerable	Less than considerable
Traffic and Transportation/Pedestrian and Bicycle Facilities	Less than considerable	Less than considerable
Utilities/Emergency Services	Less than considerable	Less than considerable
Visual Resources/Aesthetics	Less than considerable	Less than considerable
Hydrology and Floodplain	Less than considerable	Less than considerable
Water Quality and Storm Water Runoff	Less than considerable	Less than considerable
Geology/Soils/Seismic/Topography	Less than considerable	Less than considerable
Hazardous Waste/Materials	Less than considerable	Less than considerable
Air Quality	Less than considerable	Less than considerable
Noise	Less than considerable	Less than considerable (Alts 1 and 2) Considerable (Alt 3)
Energy	Less than considerable	Less than considerable
Natural Communities	Less than considerable	Less than considerable (Alts 1 and 2) Considerable (Alt 3)
Wetlands	Less than considerable	Less than considerable

TABLE 3-3 cont.
SUMMARY OF PROPOSED PROJECT CONTRIBUTION TO CUMULATIVE IMPACTS

Plant Species	None	None (Alts 1 and 2) Less than considerable (Alt 3)
Animal Species	None	None
Threatened/Endangered Species	None	None (Alts 1 and 2) Less than considerable (Alt 3)
Invasive Species	Less than considerable	Less than considerable

CHAPTER 4.0

MANDATORY CEQA SECTIONS

Chapter 4 – Mandatory CEQA Sections

4.1 NO IMPACTS

This section lists the resources that would not be impacted as a result of implementation of the Build Alternatives. The resources listed below were screened out during project scoping because they were either absent from the area, or would be unaffected by the Alternatives as designed.

- Coastal Zone
- Wild and Scenic Rivers
- Agriculture and Timberlands
- Paleontology

The resources listed below were analyzed in this Final EIR; however, the Build Alternatives were found to result in no impact:

- Parks
- Growth
- Cultural Resources
- Climate Change

4.2 LESS-THAN-SIGNIFICANT IMPACTS

This section lists the resources that would have a less-than-significant impact from implementation of the Build Alternatives due to Proposed Project design. As part of the scoping and environmental analysis conducted for the SR-94 Improvement Project, the environmental issues identified in **Table 4-1** were considered, but no significant impacts were identified.

4.3 LESS-THAN-SIGNIFICANT IMPACTS AFTER MITIGATION

Table 4-2 lists the environmental resources significantly impacted by implementation of the build alternatives, but which would be reduced to less-than-significant levels with proposed mitigation.

4.4 SIGNIFICANT UNAVOIDABLE IMPACTS

Alternative 3: Melody Road Access Alignment would significantly impact a wildlife corridor on the 87-acre parcel located between Melody Road and the JIV Reservation and would result in a Significant Unavoidable impact to Natural Communities (Wildlife Corridors), and Animal Species (Roadkill). These impacts are shown on **Table 4-3**.

Each of the tables noted above (**Tables 4-1, 4-2, and 4-3**) provide overall summaries of the alternatives relative to CEQA significance as the proposed non-access road intersection improvements would occur under any of the access road alternatives (Alternatives 1-3).

TABLE 4-1
LIST OF LESS-THAN-SIGNIFICANT IMPACTS OF BUILD ALTERNATIVES

Final EIR Section Number	Alt	Issue	Impact Name
2.1.2.1	Alt 1-3	Land Use	Consistency with State, Regional, and Local Plans and Programs (San Diego NWR CCP)
			Consistency with State, Regional, and Local Plans and Programs (San Diego County General Plan/Valle de Oro Community Plan)
2.1.2.1	Alt 1-2	Land Use	Consistency with State, Regional, and Local Plans and Programs (San Diego County General Plan/Jamul Dulzura Subregional Plan)
2.3.3	Alt 1-3	Community Character and Cohesion	Long-term Access impacts
			ROW Acquisition and Easements
			Long-term Visual Community Impacts
			Long-term Noise-related Community Impacts
			Construction
2.4.3	Alt 1-3	Traffic and Transportation/Pedestrian and Bicycle Facilities	Existing Traffic Conditions Plus JIV Gaming and Project Conditions
			Near Term (2015) with Proposed Project Traffic Conditions
			Horizon Year (2035) with Proposed Project Traffic Conditions
			Pedestrian, Transit and Bike Lanes
2.5.2	Alt 1-3	Utilities/Emergency Services	Utilities
2.6.3	Alt 1-3	Visual Resources/Aesthetics	Construction Impacts to Visual Resources
2.8.3	Alt 1-3	Hydrology and Floodplain	Construction Impacts to Hydrology
			Floodplain Impacts
2.9.3	Alt 1-3	Water Quality and Stormwater Runoff	Short Term Construction Related Water Quality Impacts
			Long Term Operational Water Quality Impacts
2.10.3	Alt 1-3	Geology/Soils/Topography/ Seismicity	Topography and Erosion
			Seismic Hazards
2.12.3	Alt 1-3	Air Quality	Construction Impacts: Regional Emissions
			Construction Impacts: Local Emissions (Hot Spot Analysis)
			Construction Impacts: Odor
			Mobile Source Air Toxics
			Long Term Emissions: Regional Air Quality
			Local Air Quality (Hot Spot Analysis)

TABLE 4-1 cont.
LIST OF LESS-THAN-SIGNIFICANT IMPACTS OF BUILD ALTERNATIVES

Final EIR Section Number	Alt	Issue	Impact Name
2.14.3	Alt 1-3	Noise	Traffic Noise
			Construction Noise
2.15.3	Alt 1-3	Energy	Energy
2.16.2	Alt 1-2	Natural Communities	Wildlife Corridors
2.18.3	Alt 1-2	Plant Species	Special-status Plant Species
2.19.3	Alt 1-3	Animal Species	Special-status Animal Species
	Alt 1-2	Animal Species	Roadkill
2.20.3	Alt 1-2	Threatened and Endangered Species	Quino Checkerspot Butterfly
			Hermes Copper Butterfly
2.21.3	Alt 1-3	Invasive Species	Invasive Species

TABLE 4-2
LIST OF LESS-THAN-SIGNIFICANT IMPACTS OF BUILD ALTERNATIVES FOLLOWING MITIGATION

Final EIR Section Number	Alt	Issue	Impact Name
2.1.2.1	Alt 1-3	Land Use	Consistency with State, Regional, and Local Plans and Programs (RTP/RTIP)
			Consistency with State, regional, and Local Plans and Programs (MSCP)
			Consistency with State, Regional, and Local Plans and Programs (RJER LMP)
			Consistency with State, Regional, and Local Plans and Programs (HCWA LMP)
2.1.2.1	Alt 3	Land Use	Consistency with State, Regional, and Local Plans and Programs (San Diego County General Plan/Jamul Dulzura Subregional Plan)
2.3.3	Alt 1-3	Community Character and Cohesion	Long-term Visual Community Impacts
2.4.3	Alt 1-3	Traffic and Transportation/Pedestrian and Bicycle Facilities	Construction Related Impacts
2.5.2	Alt 1-3	Utilities/Emergency Services	Emergency Services
2.6.3	Alt 1-3	Visual Resources/Aesthetics	Long-term Impacts to Visual Resources
2.9.3	Alt 1-3	Water Quality and Stormwater Runoff	Long-term Operational Water Quality Impacts
2.11.3	Alt 1-3	Hazardous Waste/Materials	Buried Hazards and Exposure to Hazardous Materials

TABLE 4-2 cont.
LIST OF LESS-THAN-SIGNIFICANT IMPACTS OF BUILD ALTERNATIVES FOLLOWING MITIGATION

Final EIR Section Number	Alt	Issue	Impact Name
2.16.2	Alt 1-3	Natural Communities	Natural Communities
2.17.3	Alt 1-3	Wetlands	Water Resources
2.18.3	Alt 3	Plant Species	Special-status Plant Species
2.19.3	Alt 1-3	Animal Species	Lighting and Noise
			Nesting Bird
2.20.3	Alt 3	Threatened and Endangered Species	Quino Checkerspot Butterfly
			Hermes Copper Butterfly

TABLE 4-3
LIST OF SIGNIFICANT UNAVOIDABLE IMPACTS OF BUILD ALTERNATIVES

Final EIR Section Number	Alt	Issue	Impact Name
2.16.2	Alt 3	Natural Communities	Wildlife Corridor
2.19.3	Alt 3	Animal Species	Roadkill

CHAPTER 5.0

COUNTY OF SAN DIEGO SUMMARY

Chapter 5 –County of San Diego Summary

5.1 INTRODUCTION

Components of the Alternatives 1-3: Build Alternatives for the Project include proposed improvements outside the Caltrans ROW that may be subject to one or more discretionary permits from the County of San Diego (County; the "County Improvements"). The County Improvements may include, but are not limited to, the following proposed improvements:

1. SR-94/Jamacha Boulevard: restriping of Jamacha Boulevard,
2. SR-94/Jamacha Road: new right-turn lane,
3. SR-94/Steele Canyon Road: new through lanes and street improvement to Steele Canyon Road,
4. SR-94/Lyons Valley Road: installation of new traffic signal equipment,
5. SR-94/Maxfield Road: new acceleration lane and improvement to private drive on north side of SR-94, and
6. Access Road Improvements: improvements to Melody Road, Peaceful Valley Ranch Road, Las Palmas Drive, and private drives.

Thus, the County is a Responsible Agency for the above portions of the Project under CEQA as defined in CEQA Guidelines Section 15381:

> "Responsible Agency" means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project.

Further, CEQA Guidelines Section 15050(b) states that "the decision-making body of each Responsible Agency shall consider the Lead Agency's EIR or Negative Declaration prior to acting upon or approving the project. Each Responsible Agency shall certify that its decision-making body reviewed and considered the information contained in the EIR or Negative Declaration on the project. The County, as a Responsible Agency, will be required to utilize this EIR for its CEQA review of those portions of the Project that are within its jurisdiction.

As the CEQA Lead Agency, Caltrans addressed its CEQA responsibilities in Chapters 1, 2, 3, and 4 of this Final EIR. The analysis presented in this Chapter is provided for informational purposes only and is solely intended to assist the County, as a Responsible Agency, in its review and future decisions regarding portions of the Project over which the County has discretionary approval power as a Responsible Agency. Caltrans is not subject to County standards or potential conditions that could be implemented by the County that are identified in this Chapter,

and such standards and conditions are not being used by Caltrans to comply with its CEQA responsibilities as Lead Agency.

Where applicable for each topic within this chapter, a brief description of County regulatory guidelines that may apply for proposed improvements outside of the Caltrans ROW is included under "Regulatory Framework" within the existing conditions discussion of the respective environmental resource topic. Each subsection also includes applicable County standards and environmental analysis of Project effects relative to the identified applicable County standards. Unless noted, the environmental analysis of the non-access road intersection improvements is not discussed separately, but rather, collectively as part of the discussion of Alternatives 1-3 because the proposed non-access road intersection improvements would occur under each of the access road alternatives. Where County standards are not met for those portions of the Project within County jurisdiction, the County may require the JIV Tribe to implement conditions in addition to those identified in Chapter 2. Where applicable, this chapter identifies some potential conditions that the County may choose to apply as conditions of approval, but they are not binding to the Project, nor are they explicitly required under CEQA, and they may be altered or rejected by the County. To avoid redundancy, the reader is directed to other Final EIR sections if applicable information and/or analysis have already been presented in other sections of this Final EIR. Additionally, the reader is referred to Chapter 3 in this Final EIR for a discussion of cumulative impacts.

If the No Project Alternative is selected as the Preferred Alternative, no physical improvements would occur within the County's jurisdiction and no discretionary approvals would be required of the County. The County, therefore, would not need to comply with its own standards for the implementation of the No Project Alternative. Please refer to Chapter 2 of this Final EIR for the CEQA analysis of the No Project Alternative.

As part of the scoping and environmental analysis conducted for the Project, the following environmental issues were considered, but no impacts were identified: Agricultural and Forestry Resources, Mineral Resources, Paleontological Resources, Population/Housing, and Parks and Recreation. Consequently, there is no further discussion of these issues in this Chapter. Refer to Appendix A, *CEQA Checklist*, and the introduction to Chapter 2.

5.2 LAND USE

5.2.1 Existing Conditions

Existing Setting

Refer to Sections 2.1.1 and 2.3.1 in this Final EIR for a discussion of the existing setting relative to land use and community character.

Regulatory Framework

Refer to Section 2.1.2 for a discussion of land use plans and programs applicable to the Project. In addition, components of the Project that would be located outside of the Caltrans ROW could potentially be subject to the County of San Diego Resource Protection Ordinance (RPO). The County regulates natural and cultural resources via the RPO, which provides development controls for unique topography, ecosystems, and natural characteristics within the County deemed to be fragile, irreplaceable, and vital to the general welfare of the County's residents. Resources addressed by the RPO include wetlands, wetland buffers, floodways, floodplain fringes, steep slopes, sensitive habitat lands, and significant prehistoric or historic sites. RPO resources within the Project limits include prehistoric sites and wetlands.

5.2.2 County Standards

County standards related to land use and community character impact would be exceeded if the Proposed Project would:

1. Conflict with the land use goals, objectives, policies, and recommendations of the adopted applicable plans, policies, ordinances, guidelines, or regulations adopted for protection of environmental resources or values, including, but not limited to, the General Plan, community plans, and habitat conservation plans.

2. Conflict with the established community character, as defined by the Community Plan.

3. Physically divide an established community.

5.2.3 Compliance with County Standards

Standard 1

Alternatives 1 and 2

Refer to Section 2.1.2 in this Final EIR for a discussion of consistency of the non-access road intersection improvements and Alternatives 1 and 2 access road alignments with relevant land use plans and programs.

With regard to the RPO (which was not included in the land use plan consistency analysis contained in Section 2.1.2), applicable policies of the RPO include those that address prehistoric sites and riparian habitats. No County RPO wetlands would be impacted. SR-94/Lyons Valley Road Intersection improvements would permanently impact 0.1 acre of riparian habitat. Alternatives 1 and 2 would temporarily and permanently impact varying amounts of County RPO riparian habitats; Alternative 1 would impact 0.28 acre, and Alternative 2 would impact between 0.09 and 0.28 acre (depending on the Option (refer to Table 5.14-3). These impacts to

RPO riparian habitats are based solely on County standards and only apply to components of the Project that would be located outside of the Caltrans ROW. It is anticipated that impacts to RPO riparian habitats would be consistent with the findings in RPO Section 86.604(a)(5) because there is no feasible alternative that avoids the RPO wetlands because of their location directly adjacent to the existing roadway. Additionally, conditions that could be applied by the County are identified in Section 5.13 regarding impacts to County RPO riparian habitats.

Impacts to RPO prehistoric sites would not occur because the two identified sites (refer to Section 2.7 and 5.5) would be placed in an Environmentally Sensitive Area (ESA) set-aside to ensure that impacts would be avoided. Alternatives 1 and 2 would not exceed Standard 1 with regard to consistency with the RPO.

Alternative 3

Refer to Section 2.1.2 in this Final EIR for a discussion of consistency of the non-access road intersection improvements and Alternative 3 access road alignment with relevant land use plans and programs.

With respect to consistency with the RPO, like Alternatives 1 and 2, Alternative 3 would avoid impacts to RPO prehistoric sites through implementation of ESAs.

Impacts to RPO riparian habitats however, would be substantially greater under Alternative 3 because the access road alignment would cross over Willow Creek and two tributary drainages and would not include a bottomless culvert at the Melody Road crossing. Alternative 3 would temporarily and permanently impact a total of 0.71 acre of RPO riparian habitats compared to between 0.09 and 0.28 acre for Alternatives 1 and 2; refer to Table 5.14-3). As stated above, these impacts to RPO riparian habitats are based solely on County standards and only apply to components of the Project that would be located outside of the Caltrans ROW. Because the other access road alignment alternatives (Alternatives 1 and 2) are feasible and would avoid these RPO riparian habitats (associated with Willow Creek and its tributaries), Alternative 3 would not necessarily be consistent with the policies of the RPO. Alternative 3 therefore would not meet Standard 1 with regard to consistency with the RPO.

Standard 2

Alternatives 1, 2, and 3

Refer to Section 2.3.3 in this Final EIR for a discussion of Project effects related to community character resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 3

Alternatives 1, 2, and 3

Refer to Section 2.3.3 in this Final EIR for a discussion of Project effects related to division of existing communities resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

5.2.4 Potential Conditions that Could be Implemented by the County

Section 2.1.2.2 in this Final EIR identifies potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to land use. No additional conditions are identified.

5.3 TRANSPORTATION/TRAFFIC

5.3.1 Existing Conditions

Existing Setting

Refer to Section 2.4.1 for a discussion of the setting relative to transportation and traffic.

Regulatory Framework

Refer to Section 2.4.1 of this Final EIR for a discussion of the regulatory framework relative to transportation and traffic.

5.3.2 County Standards

Based on applicable County guidelines (County 2011), County standards related to transportation and traffic would be exceeded if:

Roadway Segments

1. The additional or redistributed average daily trips (ADT) generated by the Proposed Project would cause a Mobility Element road to operate at LOS E or F as a result of the Proposed Project or would significantly increase congestion on a Mobility Element road currently operating at LOS E or F, as identified in **Table 5.3-1**, below.

TABLE 5.3-1
ALLOWABLE INCREASES ON CONGESTED MOBILITY ELEMENT ROAD SEGMENTS

LOS	Two-lane Road	Four-lane Road	Six-lane Road
E	200 ADT	400 ADT	600 ADT
F	100 ADT	200 ADT	300 ADT

2. The additional or redistributed ADT generated by the Proposed Project would cause a residential street to exceed its design capacity.

Intersections

3. The additional or redistributed ADT generated by the Proposed Project would significantly increase congestion on an intersection currently operating at LOS E or LOS F, or would cause a signalized intersection to operate at a LOS E or LOS F as identified in **Table 5.3-2**, below.

TABLE 5.3-2
ALLOWABLE INCREASES ON CONGESTED INTERSECTIONS

LOS	Signalized	Unsignalized
E	Delay of 2 seconds or less	20 or less peak period trips on a critical movement
F	Either a delay of 1 second, or 5 or less peak period trips on a critical movement	5 or less peak period trips on a critical movement

Hazards Due to an Existing Transportation Design Feature

4. Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.

5. The percentage or magnitude of increased traffic on the road due to the Proposed Project may affect the safety of the roadway.

6. The physical conditions of the Project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary objects.

7. Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.

Hazards to Pedestrians and Bicyclists

8. Design features/physical configurations on a road segment or at an intersection may adversely affect the visibility of pedestrians or bicyclists or equestrians to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.

9. The physical conditions of the Project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in vehicle/pedestrian or vehicle/bicycle or vehicle/equestrian conflicts.

Alternative Transportation

10. The Proposed Project would not comply with the County's General Plan objectives supporting alternate forms of transportation to reduce demand on the road system.

5.3.3 Compliance with County Standards

Standards 1 and 2

Alternatives 1 and 2

Alternatives 1 and 2 would not generate traffic along a County of San Diego Mobility Element Road. Therefore, Standard 1 does not apply to Alternatives 1 and 2.

Alternative 3

Under Alternative 3, a new roadway would be constructed between the approved JIV Gaming project and Melody Road. The new access road would function as the main vehicular access for the JIV Gaming project. With Alternative 3, traffic associated with the JIV Gaming project would use the segment of Melody Road between SR-94 and the new access road intersection. Melody Road is currently a two-lane undivided roadway that provides access to rural residences along both sides of the street. Under Alternative 3, this segment of Melody Road would be widened as a four-lane collector with two lanes in each direction and a center turning lane. **Table 5.3-3** presents the operations of this improved roadway segment under Horizon Year (2035) Plus Project Conditions.

As shown in the table, this roadway segment would operate at LOS A under the Horizon Year (2035) with Project conditions. Because the Horizon Year condition represents the most conservative scenario with regards to traffic (i.e., it includes traffic volumes due to projected local and regional growth), operations along this roadway segment under the other analyzed traffic scenarios would not be expected to be worse. Therefore, Alternative 3 would not exceed Standards 1 and 2 relative to Mobility Element roadway segments.

TABLE 5.3-3
HORIZON YEAR (2035) PLUS PROJECT CONDITIONS ROADWAY SEGMENT OPERATIONS – ALTERNATIVE 3

Roadway Segment	Roadway Classification (a)	LOS E Capacity	ADT (b)	Ratio (c)	LOS
Melody Road					
SR-94 to Alternative 3 Access Road	4-Lane Collector	34,200	10,800	0.316	A

Notes:
a. Roadway Classification is based on the proposed roadway configuration with Alternative 3 of the Project and the County of San Diego's Public Road Standards
b. Average Daily Volumes for the roadway segments were calculated by adding the anticipated JIV Gaming project traffic (9,000 ADT) to the Horizon Year 2035 ADT volumes projected for this roadway in the SANDAG's Series 12 Year 2035 Forecast Model.
c. The v/c Ratio is calculated by dividing the ADT volume by each respective roadway segment's capacity.

Standard 3

Alternatives 1, 2, and 3

Existing Baseline Plus JIV Gaming Facility Plus Proposed Project Conditions

Tables 2.4-34 and 2.4-35 in this Final EIR present the peak-hour LOS for the study intersections under Existing Baseline Plus JIV Gaming Facility Plus Proposed Project (Alternatives 1 and 2) conditions, and Tables 2.4-36 and 2.4-37 present the peak-hour LOS under Existing Baseline Plus JIV Gaming Facility Plus Proposed Project (Alternative 3) conditions. As shown in the tables, with implementation of the Project improvements, all analyzed intersections would operate at equal or less delay compared to without Project conditions, except Jamacha Boulevard/SR-94 during the AM peak-hour period. In addition, all of the analyzed intersections would operate at LOS D or better. Therefore, impacts to the analyzed intersections under all three Project alternatives would not exceed County standards related to intersections under Existing Plus Project conditions.

Near-term (2015) Plus Proposed Project Conditions

Tables 2.4-42 and 2.4-43 show the peak-hour LOS analysis results for the study intersections under the Near Term (2015) Plus Proposed Project (Alternatives 1 and 2) conditions, and Tables 2.4-44 and 2.4-45 show the peak-hour LOS analysis results under the Near Term (2015) Plus Proposed Project (Alternative 3) conditions. As shown in the tables, with the implementation of the Project improvements, all analyzed intersections would operate at equal or less delay compared to without Project conditions, except Jamacha Boulevard/SR-94 during the weekday AM peak-hour period and the Saturday PM peak-hour period. In addition, all analyzed intersections would operate at LOS D or better. Therefore, impacts to the analyzed intersections under all three Project alternatives would not exceed County standards related to intersections under Near-term Plus Project conditions.

Horizon Year (2035) Plus Proposed Project Conditions

Tables 2.4-52 and 2.4-53 show the peak-hour LOS analysis results for the study intersections under the Horizon Year (2035) Plus Proposed Project (Alternatives 1 and 2) conditions, and Tables 2.4-54 and 2.4-55 show the peak-hour LOS analysis results under the Horizon Year (2035) Plus Proposed Project (Alternative 3) conditions. As shown in the tables, several of the analyzed intersections would operate at LOS E or F under the "with Project" conditions. Most of these intersections, however, would result in a decrease in delay. The exception is the intersection of Jamacha Boulevard/SR-94, which would operate at LOS E in the AM peak-hour period during weekdays under all three Project alternatives and have an increase in delay of 27.1 seconds. Similarly, this intersection would operate at LOS F in the PM peak-hour period during weekdays under all three Project alternatives and have an increase in delay of 3.1 seconds. This increase in delay would be a result of changing the existing lane configuration for the northbound movement under any of the Project alternatives. These increases in delay would exceed County standards related to allowable increases at congested intersections. However, when evaluating the proposed roadway improvements within the study area overall, traffic operations would be improved compared to existing conditions. Additionally, the Project itself would not generate traffic trips.

Standards 4 through 7

<u>Alternatives 1, 2, and 3</u>

The Proposed Project circulation system was designed in conformance with applicable County design standards and requirements, and none of the Project alternatives would impede the safe movement of users along the area roadways.

A queuing analysis was conducted at the intersection of SR-94/Melody Road and SR-94/ Reservation Road (or Daisy Drive). The purpose of this analysis was to document the differences between each of the Project alternatives with respect to queuing. Tables 10-1 and 10-2 of the Project's Traffic Impact Study show the estimated traffic queues at these intersections for the 2035 Horizon Year with Project conditions. As shown in the tables, it is expected that anticipated queues would be accommodated with the proposed storage lengths.

The Project would also ensure that sight distance meeting County design standards is provided at the access road locations along SR-94. In addition, the Project would not result in increased traffic on existing roadways, with the exception of Melody Road under Project Alternative 3. Alternative 3 would include the widening of Melody Road to accommodate additional traffic associated with the JIV Gaming Facility. Accordingly, impacts associated with safety of roadways would not exceed County standards related to hazards due to transportation design features.

Standards 8 and 9

Alternatives 1, 2, and 3

Refer to the discussion under "Pedestrian, Transit and Bike Facilities" in Section 2.4.3 in this Final EIR for a discussion of Project effects related to pedestrian and bicyclist safety resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 10

Alternatives 1, 2, and 3

Refer to the discussion under "Pedestrian, Transit and Bike Facilities" in Section 2.4.3 in this Final EIR for a discussion of Project effects related to alternative transportation resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

5.3.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County Standards as outlined in the above analyses (as well as in Section 2.4), no potential conditions related to transportation/traffic issues are identified.

5.4 UTILITIES AND PUBLIC SERVICES

5.4.1 Existing Conditions

Refer to Section 2.5.1 for a discussion of the existing conditions relative to utilities and emergency services.

5.4.2 County Standards

County standards related to utilities and public services would be exceeded if the Proposed Project would:

1. Create a demand for potable water that cannot be met with the current projected water supplies and/or that requires significant alterations to the existing water pipelines and infrastructure that is needed to convey potable water to the site.

2. Generate wastewater that cannot be treated by an existing or proposed facility and/or requires significant alterations to existing sewage systems and infrastructure.

3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

4. Result in the need for altered or new governmental facilities in order to maintain acceptable service ratios, response times, or other performance service measures, the construction of which could cause significant environment effects.

5.4.3 Compliance with County Standards

Standards 1, 2, and 3

Refer to Section 2.5.2 in this Final EIR for a discussion of Project effects on utilities resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments. In addition, the Proposed Project would not result in a long-term demand for water and wastewater services because it entails implementation of roadway improvements. During construction, such services may be required on a short-term temporary basis, but the demand would not exceed County standards related to water and wastewater service capacities.

Standard 4

Alternatives 1, 2, and 3

Refer to Section 2.5.2 in this Final EIR for a discussion of Project effects on emergency services resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

5.4.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County Standards as outlined in the above analyses (as well as in Section 2.5), no potential conditions related to utilities and public services are identified.

5.5 VISUAL RESOURCES

5.5.1 Existing Conditions

Existing Setting

Refer to Section 2.6.1 of this Final EIR for a complete Visual Resources setting discussion, including characterization of the visual environment where the Project would be located, types of viewers, viewer sensitivity and anticipated exposure level, and combined anticipated viewer response.

Regulatory Framework

Section 2.6.1 is additionally supported by the Project Visual Impact Assessment (VIA). The VIA document format and content requirements are very similar to the County's 2007 Report Format and Content Requirements.

Specific to regulations, the San Diego County Code Division 9, Light Pollution Code (Sections 59.101 *et seq*.) addresses lamp type and shielding required for installation of outdoor light fixtures on lands under County jurisdiction unless exempted pursuant to Code Sections 59.108 through 59.110. The intent of the ordinance is specifically to address and protect nighttime views or astronomical observations at the Palomar and Mount Laguna observatories.

5.5.2 County Standards

Based on applicable County guidelines (2007a and 2007b), County standards related to visual resources would be exceeded if the Proposed Project would:

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

2. Result in the removal or substantial adverse change of one or more features that contribute to the valued visual character or image of the neighborhood, community, or localized area, including but not limited to landmarks (designated), historic resources, trees, and rock outcroppings.

3. Substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:

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

4. Not comply with applicable goals, policies or requirements of an applicable County Community Plan, Subregional Plan, or Historic District's Zoning.

5. Not conform to applicable regulations related to dark skies or glare, including but not limited to the County Light Pollution Code (LPC).

5.5.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

Refer to Section 2.6.3 in this Final EIR for a discussion of Project effects on existing visual character and visual quality resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments. Inconsistency with design guidelines is addressed under Standard 4.

Standard 2

Alternatives 1, 2, and 3

Refer to Section 2.6.3 in this Final EIR for a discussion of Project effects on scenic resources resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 3

Alternatives 1, 2, and 3

Refer to Section 2.6.3 in this Final EIR for a discussion of Project effects on scenic vistas resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 4

Alternatives 1, 2, and 3

Refer to Section 2.1.2 in this Final EIR for a discussion of consistency of the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments with relevant land use plans and programs. The Project is not located within a zoned historic district.

Standard 5

Alternatives 1, 2, and 3

Refer to Section 2.6.3 in this Final EIR for a discussion of Project effects related to light and glare resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

5.5.4 Potential Standards that Could be Implemented by the County

Sections 2.6.4 and 2.1.2.2 in this Final EIR identifies potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to visual resources and land use plan consistency. No additional conditions are identified

5.6 CULTURAL RESOURCES

5.6.1 Existing Conditions

Existing Setting

Refer to Section 2.7.1 of this Final EIR for a complete Cultural Resources existing conditions discussion, including information on all sites identified, as well as documentation of significance assessment and Native American consultation.

Regulatory Framework

Refer to Section 2.7.1 for a discussion of the regulatory setting. The County also regulates cultural resources via the RPO (refer to Section 5.2.1).

5.6.2 County Standards

Based on applicable County guidelines (County 2007d), County standards related to cultural resources would be exceeded if the Proposed Project would:

1. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines. This shall include the destruction, disturbance or any alteration of characteristics or elements of a resource that cause it to be significant in a manner not consistent with the Secretary of Interior Standards.

2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the State CEQA Guidelines. This shall include the destruction or disturbance of an important archaeological site or any portion of an

important archaeological site that contains or has the potential to contain information important to history or prehistory.

3. Disturb any human remains, including those interred outside of formal cemeteries.

4. Propose activities or uses damaging to significant cultural resources as defined by the Resource Protection Ordinance (RPO) and the Project fails to preserve those resources.

5.6.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

Refer to Section 2.7.3 in this Final EIR for a discussion of Project effects on historical resources resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 2

Alternatives 1, 2, and 3

Refer to Section 2.7.3 in this Final EIR for a discussion of Project effects on archaeological resources resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 3

Alternatives 1, 2, and 3

Refer to Section 2.7.3 in this Final EIR for a discussion of Project effects related to the potential to disturb human remains resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 4

Alternatives 1, 2, and 3

The County RPO does not allow non-exempt activities or uses damaging to significant prehistoric lands on properties under County jurisdiction. The only exempt activity is scientific investigation. The Project is required to be in conformance with applicable County standards related to cultural resources, including the noted RPO criteria for prehistoric sites.

Two sites that would qualify as RPO-protected resources would be protected in their entirety, including the areas that extend outside of the Caltrans ROW, through ESAs. There is, however, a low potential for an impact to a previously undocumented RPO-protected resource to occur. Such an occurrence would exceed County standards related to protection of RPO cultural resources.

5.6.4 Potential Conditions that Could be Implemented by the County

Section 2.7.4 in this Final EIR identifies potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to cultural resources.

5.7 HYDROLOGY AND FLOODPLAIN

5.7.1 Existing Conditions

Existing Setting

Refer to Section 2.8.1 for a discussion of the existing setting relative to hydrologic and floodplain conditions.

Regulatory Framework

Clean Water Act/National Pollutant Discharge Elimination System

General Construction Activity Storm Water Permit

For improvements within the County jurisdiction, conformance with the Construction General Permit is required prior to development of applicable sites exceeding one acre, with this permit issued by the SWRCB under an agreement with the USEPA. Specific conformance requirements include implementing a Storm Water Pollution Prevention Plan (SWPPP), an associated Construction Site Monitoring Program (CSMP), employee training, and minimum Best Management Practices (BMPs), as well as a Rain Event Action Plan (REAP) for applicable projects. The SWPPP and related plans/efforts identify detailed measures to address potential effects to watersheds/drainage characteristics, and prevent and control the off-site discharge of pollutants in storm water runoff. While site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil characteristics, detailed guidance for construction-related BMPs is provided in the permit and related County standards.

Municipal Storm Water Permit

The Municipal Permit is intended to protect environmentally sensitive areas and provide conformance with pertinent hydrology/water quality standards, including the Clean Water Act (CWA) and the Regional Water Quality Control Board (RWQCB) Basin Plan. Identified

requirements involve using a number of planning, design, operation, treatment, and enforcement measures to reduce drainage impacts and pollutant discharges from individual development projects (and the municipal storm drain system as a whole) to the maximum extent practicable (MEP). Specifically, these measures include: (1) using jurisdictional planning efforts (such as discretionary general plan approvals) to provide hydrology/water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based hydrology/water quality protection; (3) implementing applicable low impact development (LID), site design, source control, priority project, and/or volume- or flow-based (as defined in the permit text) treatment control BMPs to avoid, reduce and/or mitigate effects including increased erosion and sedimentation, hydromodification[1] and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The Municipal Permit also requires co-permittees to fund and implement urban runoff management plans (URMPs) to reduce runoff and pollutants discharges to the MEP.

County of San Diego

Watershed Protection, Storm Water Management and Discharge Control Ordinance

The purposes of the Watershed Protection, Storm Water Management and Discharge Control Ordinance (WPO) is to protect the health, safety, and general welfare of the County of San Diego residents; to protect water resources and improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal law. The WPO contains discharge prohibitions and requirements that vary depending on the type of land use activity and location in the County.

Resource Protection Ordinance

The RPO prohibits development of permanent structures for human habitation or as a place of work in a floodway.

Grading Ordinance

The purpose of the Grading Ordinance (Ordinance No. 10179) is to combine regulations affecting the grading and clearing of land, as well as activities affecting watercourses, within the unincorporated County of San Diego. Chapter 6 (Section § 87.601- 87.608) covers watercourses

[1] Hydromodification is defined in the Municipal Permit as the change in natural watershed hydrologic processes and runoff characteristics (infiltration and overland flow) caused by urbanization or other land use changes that result in increased stream flows, sediment transport, and morphological changes in the channels receiving the runoff.

and is intended to protect persons and property against flood hazards by identifying prohibited acts in watercourses and acts prohibited unless a permit is obtained.

Hydromodification Management Plan (HMP)

The County prepared an HMP for Priority Development Projects (PDPs), with the final (adopted) HMP dated March 2011. Specifically, the HMP requires that all PDPs must either demonstrate that a project is exempt from HMP requirements based on the identified criteria, or provide compliance with the requirements to address hydromodification as outlined in the HMP.

San Diego County Hydrology Manual

The San Diego County Hydrology Manual provides uniform procedures for analyzing flood and storm water conditions in the County. Specific elements of these procedures include methods to estimate storm flow peaks, volumes and time distributions. These data are used in the design of storm water management facilities to ensure appropriate dimensions and capacity (typically 100-year storm flow volumes), pursuant to applicable requirements in the San Diego County Drainage Design Manual.

Refer also to Section 2.8.1 for regulatory setting.

5.7.2 County Standards

Based on applicable County guidelines (County 2007g), County standards related to hydrology and floodplain would be exceeded if the Proposed Project would:

1. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

2. Result in increased velocities and peak flow rates exiting the Project site that would cause flooding downstream or exceed the storm water drainage system capacity serving the site.

3. Exceed applicable hydromodification requirements or conflict with the County of San Diego Final Hydromodification Management Plan (HMP; County 2011).

4. Place structures within a 100-year flood hazard or alter the floodway in a manner that would redirect or impede flow and would:

    a. Alter the Lines of Inundation resulting in the placement of other housing in a 100-year flood hazard; or

b. Increase the water surface elevation in a watercourse with a watershed equal to or greater than one square mile by one foot or more in height.

5.7.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

Refer to Section 2.8.3 in this Final EIR for a discussion of Project effects related to alteration of existing drainage patterns resulting from the non-access road intersection improvements and Alternatives 1, 2, and 3 access road alignments.

Standard 2

SR-94/Jamacha Boulevard and SR-94/Lyons Valley Road Intersection Improvements

As described above and in Section 2.8, the SR-94/Jamacha Boulevard and SR-94/Lyons Valley Road intersection improvements would be limited to activities such as lane restriping of existing roads, vegetation trimming, and/or traffic signal modifications, with no grading or construction of additional impervious areas. As a result, no modifications to existing surface flow rates and velocities would result from proposed improvements at these two intersections, and implementation of the noted improvements would not exceed County Standard No. 2 regarding runoff rates/volumes, downstream flooding potential or the capacity of existing or proposed drainage facilities.

SR-94 and Jamacha Road, Steele Canyon Road, and Maxfield Road Intersection Improvements

As outlined in Section 2.8, a computer model was prepared to evaluate potential changes to surface hydrology in the adjacent channels and drainages for the proposed SR-94 intersection improvements at Jamacha Road, Steele Canyon Road, and Maxfield Road. Associated calculations are based on a 25-year storm event, and incorporate proposed long-term water quality BMPs including biofiltration swales and riprap energy dissipators. Specifically, while the primary use of these BMPs would be to provide water quality treatment (as outlined in Sections 2.9 and 5.7), they would also facilitate surface water infiltration and reduce the velocity of flows prior to entering the main drainages. Based on the model results and the associated data provided in Tables 2.8-1 through 2.8-3, surface water flow rates and velocities for a 25-year storm event at the noted intersections would not vary substantially from the existing conditions, and would not cause downstream flooding or exceed the capacity of existing or proposed drainage facilities. As a result, implementation of the described improvements would not exceed County Standard No. 2 regarding runoff rates/volumes, downstream flooding potential or the capacity of existing or proposed drainage facilities.

Access Road Improvement Alternatives

As described in Section 2.8, surface runoff calculations were conducted to evaluate potential hydrologic changes in the adjacent channels for the access road improvement alternatives. Associated calculations are based on a 100-year storm event, and incorporate proposed long-term water quality BMPs as noted above for the proposed intersection improvements. Based on the associated data provided in Table 2.8-4, surface water flow rates and velocities for a 100-year storm event at the access improvement option sites would not vary substantially from the existing conditions. As a result, the noted access improvements would not exceed County Standard No. 2 regarding runoff rates/volumes, downstream flooding potential or the capacity of existing or proposed drainage facilities.

Standard 3

Alternatives 1, 2, and 3

As described above under Standard 2 and in Section 2.8, the SR-94/Jamacha Boulevard and SR-94/Lyons Valley Road intersection improvements would be limited to activities such as lane restriping of existing roads and/or traffic signal modifications, with no grading or additional impervious areas. As a result, no modifications to existing surface flow rates and velocities would result from proposed improvements at these two intersections, and implementation of the noted improvements would not exceed County Standard No. 3 regarding hydromodification.

As shown in Tables 2.8-1 through 2.8-4 in Section 2.8 of this Final EIR, the flow rate and surface water velocity during a 25-year storm event is anticipated to be substantially the same in the existing and proposed conditions. This is mainly due to the relatively small amount of impervious surface added at the intersection improvement areas. Additionally, the Project design includes biofiltration swales as BMPs to reduce the flow rate and velocity of surface water as previously noted. The biofiltration swales are designed to allow surface water to collect, filtrate, and infiltrate within the swale. The biofiltration swale is designed to accommodate the amount of water expected to flow through the swale during a storm event, and riprap (layered rock) energy dissipaters are also included as Project BMPs to reduce the velocity of surface water at applicable outlet points. For these reasons, Project implementation would not exceed County Standard No. 3 regarding hydromodification.

Standard 4

Alternatives 1, 2, and 3

As described in Section 2.8, none of the proposed improvements under Alternatives 1 through 3 are located within mapped 100-year floodplain boundaries, or are anticipated to result in a significant rise in surface water elevations during a 100-year flood event. Because the proposed

improvements at the SR-94/Jamacha Road and SR-94/Melody Road intersections include facilities within and adjacent to existing drainage channels, however, changes in water surface elevations were calculated for these two areas. Based on the analysis described in Section 2.8 and the related data provided in Table 2.8-5, the following conclusions are provided:

- The water surface elevation at the SR-94/Jamacha Road intersection is anticipated to increase by up to 0.26-foot (approximately 3 inches) from the Proposed Project encroachment. As described in Section 2.8, the identified 0.26-foot increase would not exceed the surface elevation of this intersection, and would not expose people or property to flooding or flood hazards that did not previously exist.

- The water surface elevation at the SR-94/Melody Road intersection is anticipated to decrease by approximately two feet as a result of the Project (i.e., due to the proposed installation of a larger culvert at this location).

Based on the above considerations, implementation of the proposed improvements under Alternatives 1 through 3 would not exceed County Standard No. 4 regarding flood hazards or surface water elevations.

5.7.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County Standards as outlined in the above analyses (as well as in Section 2.8), no conditions related to hydrology and floodplain issues are identified.

5.8 WATER QUALITY

5.8.1 Existing Conditions

Existing Setting

Refer to Section 2.9.1 for a discussion of the setting relative to water quality conditions.

Regulatory Framework

Clean Water Act/National Pollutant Discharge Elimination System

Proposed Project improvements within the County jurisdiction would be subject to applicable CWA and NPDES requirements, including the Construction General Permit and the Municipal Storm Water Permit as outlined in Sections 2.9 and 5.6.

County of San Diego

Watershed Protection, Storm Water Management and Discharge Control Ordinance

The WPO and the Storm Water Standards Manual (SSM) were adopted in August 2003. The main objectives of these ordinances are outlined in Section 5.6, and are intended to ensure the County is compliant with applicable state and federal law. As previously noted, the WPO contains discharge prohibitions and requirements that vary based on land use activity and location. The SSM is Appendix A of the WPO, and sets out in more detail (i.e., by project category) what dischargers must do to comply with the WPO and to receive permit approvals for projects and activities that are subject to the WPO. The WPO and SSM define the requirements that are legally enforceable by the County in the unincorporated area of San Diego County.

Standard Urban Stormwater Mitigation Plan

The County has adopted a Standard Urban Stormwater Mitigation Plan (SUSMP) for Land Development and Public Improvement Projects. The SUSMP is focused on project design and related post-construction requirements for land development and capital improvement projects, and addresses WPO standards for these project types.

The RWQCB Water Quality Control Plan for the San Diego Basin (Basin Plan)

The RWQCB Basin Plan establishes a number of beneficial uses and water quality objectives for surface and groundwater resources. Beneficial uses are generally defined in the Basin Plan as "the uses of water necessary for the survival or well-being of man, plus plants and wildlife." Water quality objectives identified in the Basin Plan are based on established beneficial uses, and are defined as "the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses."

Refer also to Section 2.9.1 for regulatory setting.

5.8.2 County Standards

Based on applicable County of San Diego guidelines (County 2007h), County standards related to water quality concerns would be exceeded if the Proposed Project would:

1. Consist of a development project as listed in County of San Diego, Code of Regulatory Ordinances[2] (Regulatory Ordinances), Section 67.804(g), as amended, and not comply

[2] The San Diego County Code of Regulatory Ordinances is part of the County Administrative Code, which establishes the duties, rules, regulations and systems of management of the various offices, departments and institutions of the County of San Diego, as adopted by the Board of Supervisors pursuant to Subsection (g) of Section 12 of the Charter of the County of San Diego.

with the standards set forth in the County Stormwater Standards Manual, Regulatory Ordinances Section 67.813, as amended, or the Additional Requirements for Land Disturbance Activities set forth in Regulatory Ordinances, Section 67.

2. Drain to a tributary of an impaired water body listed on the Clean Water Act Section 303(d) list, and contribute substantial additional pollutants for which the receiving water body is already impaired.

3. Contribute pollution in excess of that allowed by applicable state or local water quality objectives or cause or contribute to the degradation of beneficial uses.

4. Fail to conform to applicable Federal, State or local "Clean Water" statutes or regulations including, but not limited to, the Federal Water Pollution Control Act (Clean Water Act) California Porter-Cologne Water Quality Control Act and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance.

5.8.3 Compliance with County Standards

Standards 1, 3, and 4

Alternatives 1, 2, and 3

As outlined in Section 2.9, implementation of Alternatives 1 through 3 would result in potential water quality impacts related to short-term construction activities and long-term operation and maintenance. Potential construction-related impacts would be similar for all elements of Alternatives 1 through 3, and would be associated with erosion/sedimentation from grading and/or excavation, the use and storage of construction-related hazardous materials (e.g., vehicle fuels, etc.), and the generation of debris and pollutants from demolition activities. Long-term water quality impacts would also be similar for all elements of Alternatives 1 through 3, and would be associated with pollutants generated during vehicle operations (including particulates, metals, petroleum compounds, organic materials, and trash and debris) and roadway/landscape maintenance activities (including similar pollutants as noted above for operation, as well as chemical pesticides/herbicides and nutrients derived from chemical fertilizers).

Potential short-term water quality concerns for Project activities within County jurisdiction would be addressed through conformance with the NPDES Construction General Permit (as described in Section 2.9) and associated County standards. This would include implementing an authorized NPDES/County SWPPP for proposed construction, including applicable BMPs. While specific construction BMPs would be determined during the SWPPP process based on site and Project characteristics (soils, slopes, grading, etc.), they would include standard industry measures and guidelines from the NPDES Construction General Permit and County Stormwater Ordinance/SSM (as applicable for Project activities within County jurisdiction).

Potential long-term water quality effects from Project activities within County jurisdiction would also be addressed through conformance with applicable regulatory requirements, as described above and in Section 2.9. This would include the NPDES Municipal Permit and the County standards identified above under Regulatory Setting. Specifically, the proposed use of biofiltration swales as long-term water quality treatment BMPs would be consistent with applicable County standards including the WPO and SSM; LID Manual (County 2007), which includes biofiltration facilities as LID measures; and the SUSMP (County 2012), which identifies biofiltration facilities as exhibiting medium or high treatment effectiveness for all identified pollutants except nutrients. Specifically, biofiltration facilities exhibit a low treatment effectiveness for nutrients, with additional proposed measures to address this potential issue including retention of existing vegetation wherever feasible, and use of native landscape varieties to avoid or minimize fertilizer (nutrient) application and irrigation requirements.

A summary of anticipated construction and operational/maintenance BMPs that would be applicable to the Proposed Project is provided in Section 2.9. Based on implementation of appropriate short- and long-term BMPs as part of (and in conformance with) applicable regulatory requirements (including NPDES, County, and Basin Plan standards), Project activities in County jurisdiction would not exceed related County water quality standards (including criteria related to Basin Plan beneficial uses and water quality objectives). As previously indicated, BMPs would be further defined as part of the regulatory process, with the resulting BMPs taking priority over the more general types of standard industry measures listed herein.

Standard 2

Alternatives 1, 2, and 3

As outlined in Sections 2.8 and 2.9, downstream receiving waters for Alternatives 1, 2, and 3 include Jamul, Dulzura and Willow creeks; the Otay and Sweetwater rivers, and the Sweetwater and Lower Otay reservoirs. Associated Section 303(d) impairment listings for these waters include:

- Jamul Creek. Ten miles listed for toxicity.
- Lower Sweetwater River (below Sweetwater Reservoir). Five miles listed for bacteria, phosphorus, selenium, total dissolved solids, total nitrogen (as N), and toxicity.
- Sweetwater Reservoir. 925 acres listed for dissolved oxygen.
- Otay Reservoir. 1,050 acres listed for ammonia, color, iron, manganese, nitrogen, and high pH.

Implementation of the proposed short- and long-term BMPs identified above under Standards 1 through 3 (including the measures outlined in Section 2.9) would address potential water quality impacts to downstream receiving waters, including the pollutants identified in association with Section 303(d) listings. As a result, implementation of Alternatives 1 through 3 would not exceed County standards related to water quality conditions in downstream waters listed as impaired under Section 303(d).

5.8.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County Standards as outlined in the above analyses (as well as in Section 2.9), no conditions related to water quality issues are identified.

5.9 GEOLOGY AND SOILS

5.9.1 Existing Conditions

Existing Setting

Refer to Section 2.10.1 for a discussion of the setting relative to geology and soils.

Regulatory Framework

Refer to Section 2.10.1 for a discussion of the regulatory setting relative to geology and soils.

5.9.2 County Standards

Based on applicable County of San Diego guidelines (County 2007f), County standards related to geology and soils would be exceeded if the Proposed Project:

1. Proposes the following uses within an Alquist-Priolo Earthquake Fault Zone which are prohibited by the County:

    a) Uses containing structures with a capacity of 300 people or more. Any use having the capacity to serve, house, entertain, or otherwise accommodate 300 or more persons at any one time.

    b) Uses with the potential to severely damage the environment or cause major loss of life. Any use having the potential to severely damage the environment or cause major loss of life if destroyed, such as dams, reservoirs, petroleum storage facilities, and electrical power plants powered by nuclear reactors.

    c) Specific civic uses. Police and fire stations, schools, hospitals, rest homes, nursing homes, and emergency communication facilities.

2. Is located within a County Near-Source Shaking Zone or within Seismic Zone 4 and the Project does not conform with the IBC (which encompasses the former Uniform Building Code [UBC]).

3. Has potential to expose people or structures to substantial adverse effects because:

    a) The Project site has potentially liquefiable soils; and

    b) The potentially liquefiable soils are saturated or have the potential to become saturated; and

    c) In-situ densities are not sufficiently high to preclude liquefaction.

4. Would expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving landslides.

5. Is located on a geologic unit or soil that is unstable, or would become unstable as a result of the Project, potentially resulting in an on- or off-site landslide.

6. Lies directly below or on a known area subject to rockfall which could result in collapse of structures.

7. Is located on expansive soil, as defined in Section 1802.3.2 of the IBC (2006) and does not conform to the IBC.

5.9.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

Alternatives 1 through 3 are not located within or adjacent to any Alquist-Priolo Earthquake Fault Zones, as established by the California Geological Survey (CGS, 2007). The closest Alquist-Priolo Zone is located approximately 13 miles west of the SR-94/Jamacha Boulevard intersection (the easternmost site), and is associated with active onshore segments of the Newport-Inglewood/Rose Canyon Fault Zone. Based on the described location of proposed facilities under Alternatives 1 through 3 relative to Alquist-Priolo Earthquake Fault Zones (as well as the nature of Proposed Project facilities), Project implementation would not exceed Associated County standards related to Alquist-Priolo Earthquake Fault Zones.

Standard 2

Alternatives 1, 2, and 3

While the Alternative 1 through 3 sites are not located within or adjacent to a County Near-Source Shaking Zone (County 2007), like all of San Diego County they are within a Seismic Zone 4 designation. Seismic Zone 4 is the highest risk category of the four nationwide seismic zones, and generally exhibits a 10 percent chance of experiencing an earthquake-generated peak ground acceleration (ground shaking) value of 0.4g within the next 50 years (where g equals the acceleration due to gravity). For comparison purposes, Seismic Zone 1 (the lowest risk category) exhibits a 10 percent chance of experiencing an earthquake-generated peak ground acceleration of 0.1g within the next 50 years. The *District Preliminary Geotechnical Report* prepared for the Proposed Project (Geocon, Inc., 2013) identifies an estimated peak horizontal ground acceleration value of approximately 0.3g in association with a magnitude 7.7 earthquake along one or more larger regional fault zones (which is somewhat lower than the general 50-year/10 percent recurrence ground acceleration level noted above for Seismic Zone 4). While the described levels of ground shaking could potentially result in damage to Proposed Project facilities such as pavement and utilities, Project design and construction for Alternatives 1 through 3 would be subject to applicable regulatory criteria that would involve incorporating pertinent seismic factors into the design of facilities, such as pavement and utilities, as well as related activities including remedial grading (e.g., removal and/or reconditioning unsuitable soils), site drainage, and proper fill composition/placement. Implementation of these standard engineering and construction practices and conformance with applicable regulations and standards would effectively avoid or reduce potential seismic ground acceleration impacts, such that Project implementation would not exceed associated County standards related to seismic hazards. An exception to this conclusion involves potential seismic-related effects to manufactured slope and retaining wall stability, as described below under Standards 4 through 6 and in Section 2.10.

Standard 3

Alternatives 1, 2, and 3

Liquefaction is a phenomenon in which loose, saturated, and relatively cohesionless soil deposits located beneath the groundwater table lose strength during strong ground motions (e.g., seismic ground shaking). Primary factors controlling liquefaction include the intensity and duration of ground shaking, characteristics of the subsurface soil, in-situ stress conditions, and depth to groundwater. As outlined in Section 2.10, the Project Preliminary Geotechnical Report concludes that the potential for liquefaction at the proposed Alternative 1 through 3 areas is considered low, due to the presence of relatively shallow dense materials and the lack of near-surface groundwater. In addition, if liquefiable soil deposits are encountered during proposed

development under Alternatives 1 through 3, they would be addressed through implementation of standard geotechnical and construction measures pursuant to regulatory/industry criteria under applicable IBC, CBC, County, and/or Greenbook guidelines. Specifically, as outlined in Section 2.10, these measures may include efforts such as the use of subdrains, or reinforced foundations. Based on these considerations and the required conformance with applicable related industry/regulatory standards, implementation of Alternatives 1 through 3 would not exceed associated County standards related to liquefaction.

Standards 4 through 6

Alternatives 1, 2, and 3

Proposed improvements under Alternatives 1 through 3 are located in areas with generally level to mildly sloping terrain adjacent to the associated roadways. The County *Landslide Susceptibility Areas* Map does not identify any on-site or nearby zones of high or moderate landslide susceptibility, with all areas within or adjacent to the Alternative 1 through 3 sites identified as exhibiting slope grades of less than 25 percent (County 2007). Based on the described conditions, implementation of Alternatives 1 through 3 would not exceed associated County standards related to potential landslide or rockfall hazards on existing slopes.

The Project Preliminary Geotechnical Report also evaluates potential stability issues related to manufactured slope stability (including roadway embankments) and related structures such as retaining walls associated with proposed development under Alternatives 1 through 3. As outlined in Section 2.10, this analysis identifies a number of potential design measures to address seismic-related effects to manufactured slopes and related structures, including: constructing earth fills to partially absorb underlying ground movements; isolating foundations from the underlying ground movements; incorporating appropriate design parameters for retaining walls (heights, materials, construction methods, etc.); and designing strong, ductile foundations that can accommodate some deformation without compromising the functionality of the structure. Because the identification of specific slope/facility design measures to address potential concerns would entail completion of a detailed Geotechnical Investigation, however, implementation of Alternatives 1 through 3 could potentially exceed County standards associated with seismic-related manufactured slope/retaining wall instability.

Standard 7

Alternatives 1, 2, and 3

Expansive (or shrink-swell) behavior in soils is attributable to the water-holding capacity of clay minerals, and can adversely affect the integrity of facilities such as pavement and utilities. A number of mapped soils within the Alternative 1 through 3 sites exhibit moderate or high expansion potential (Natural Resources Conservation Service [NRCS] 1973). As described in

Section 2.10, however, "Soil sample logs shown in the Preliminary Geotechnical Report …indicate that soil samples taken to a depth of approximately 4-feet identified silty sandy soils and granitic rock…As such, the potential for expansive soils is considered low…" It should also be noted that, if expansive soil deposits are encountered during proposed development under Alternatives 1 through 3, they would be addressed through implementation of standard geotechnical and construction measures pursuant to regulatory/industry criteria under applicable IBC, CBC, County and/or Greenbook guidelines. Specifically, such measures typically entail efforts including soil treatment to reduce expansion and moisture content; replacement or (if applicable) mixing of expansive materials with engineered fill (i.e., fill exhibiting characteristics such as proper composition, moisture content, application methodology and compaction); and capping expansive materials with engineered fill in applicable areas. Based on these considerations and the required conformance with applicable industry/regulatory standards (including the IBC), implementation of Alternatives 1 through 3 would not exceed County standards related to expansive soils.

5.9.4 Potential Conditions that Could be Implemented by the County

Section 2.10.4 in this Final EIR identifies potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to seismic hazards. No additional conditions are identified.

5.10 HAZARDOUS MATERIALS

5.10.1 Existing Conditions

Existing Setting

Refer to Section 2.11.1 for a discussion of the setting relative to hazardous materials.

Regulatory Framework

San Diego County Site Assessment and Mitigation Program

The San Diego County Site Assessment and Mitigation (SAM) Program consists of project managers, field technicians, supervisors, and support staff, whose primary purpose is to protect human health, water resources, and the environment within San Diego County by providing oversight of assessments and cleanups in accordance with the California Health and Safety Code and the California Code of Regulations. The SAM's Voluntary Assistance Program also provides staff consultation, project oversight, and technical or environmental report evaluation and concurrence (when appropriate) on projects pertaining to properties contaminated with

hazardous substances. SAM maintains an environmental assessment case listing at http://www.co.sandiego.ca.us/deh/lwq/sam/index.html.

San Diego County Underground Storage Tank Program

The County's Underground Storage Tank (UST) Program administers and enforces Federal and State laws and regulations and local ordinances for the construction/installation, modification, upgrade, and removal of USTs in San Diego County. If contamination is discovered or likely to be present, owners or operators of USTs are required by law to report the contamination to the County and to take corrective action.

Refer also to Section 2.11.1 for regulatory setting.

5.10.2 County Standards

Based on applicable County of San Diego guidelines (County 2007e), County standards related to hazardous materials would be exceeded if the Proposed Project:

1. Is located on or within one-quarter mile from a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5 or is otherwise known to have been the subject of a release of hazardous substances, and as a result the Project may result in a significant hazard to the public or the environment.

2. Would involve the demolition of commercial, industrial or residential structures that may contain asbestos containing materials (ACM), lead based paint (LBP) and/or other hazardous materials and as a result, the Project would represent a significant hazard to the public or the environment.

5.10.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

Based on the description and analysis of the Alternative 1 through 3 sites in Section 2.11 and the associated Phase 1 Environmental Site Assessments (Natural Investigations Company [NIC] 2014a through 2014f), the following conclusions are provided regarding the occurrence of listed or otherwise known hazardous materials sites:

- Access Improvement Options: Known uses of hazardous materials or petroleum products in the vicinity of the access improvement option sites are limited to fueling facilities at two fire stations located at 14145 SR-94 and 14024 Peaceful Valley Ranch Road. Both of these sites are permitted facilities that are regularly inspected by the County, and have no

known history of leaks or contamination. The Environmental Site Assessment (NIC 2014a) also concludes that there are no historic or current recognized environmental conditions (RECs[3]) associated with the access improvement option sites, based on field reconnaissance, records review, database searches, and interviews. As a result, implementation of any of the access improvement options would not exceed applicable County standards related to listed or otherwise known hazardous materials sites.

- SR-94 and Jamacha Boulevard, Lyons Valley Road, and Maxfield Road Intersection Improvements: There are no historic or current RECs associated with the identified intersection sites, based on field reconnaissance, records review, database searches, and interviews. Accordingly, implementation of the proposed SR-94 intersection improvements at Jamacha Boulevard, Lyons Valley Road, or Maxfield Road would not exceed applicable County standards related to listed or otherwise known hazardous materials sites.

- SR-94/Jamacha Road Intersection Improvements: There are no historic or current RECs associated with the identified intersection site, based on field reconnaissance, records review, database searches, and interviews. While a number of surrounding parcels include light industrial uses and automotive fueling/service stations, the Environmental Site Assessment (NIC 2014e) did not identify any evidence of associated contamination. As a result, implementation of the proposed SR-94/Jamacha Road intersection improvements would not exceed applicable County standards related to listed or otherwise known hazardous materials sites.

- SR-94/Steele Canyon Road Intersection Improvements: A number of properties in the vicinity of this intersection have been used for automotive fueling/service stations and dry cleaning. The Environmental Site Assessment for this intersection (NIC 2014f) identified an associated REC related to soil and groundwater contamination at a commercial site (7 Eleven Store) located at 12981 Campo Road. This REC is associated with two previous (removed) USTs used for vehicle fueling, with documented contaminates including diesel, gasoline, and gasoline additives (TBA, MTBE, and benzene). While remediation efforts at this site are currently being implemented by the RWQCB, for purposes of this analysis it is assumed that contaminates are still present and remediation efforts would not be completed prior to implementation of the proposed SR-94/Steele Canyon Road intersection improvements. Accordingly, implementation of

[3] RECs are defined in ASTM Standard E 1527-13 as: "[t]he presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."

the proposed SR-94/Jamacha Road intersection improvements could potentially exceed applicable County standards related to listed or otherwise known hazardous materials sites.

Standard 2

Alternatives 1, 2, and 3

As outlined in Section 2.11 and the associated Environmental Site Assessments (NIC 2014a through 2014f), the potential occurrence of additional hazardous materials including lead-containing materials and treated wood waste (TWW) has been identified for all of the Alternative 1 through 3 sites. In addition, asbestos-containing materials (ACMs) may potentially occur on all of the Alternative 1 through 3 sites, as described below:

- Asbestos-containing Materials: The occurrence of ACMs along roadways is typically associated with facilities such as spacers (shims) along bridge/guardrail interfaces, and pipeline insulation. Demolition/removal of facilities containing ACMs can result in hazards to construction workers and other people in the vicinity, and typically requires specialized handling and disposal methods. While the presence of ACMs has not been determined for any of the Alternative 1 through 3 sites, implementation of these alternatives could potentially exceed applicable County standards related to the occurrence of ACMs.

- Lead-containing Materials: The discussion in Section 2.11 describes the fact that aerially-deposited lead (ADL) is derived from the previous (prior to approximately 1990) use of leaded gasoline, with ADL deposits potentially located in surface and near-surface soils along heavily used roadways. Excavation of soils containing ADL can, depending on contamination levels, result in hazards to construction workers and other people in the vicinity, and may require specific handling and disposal methods.

  In addition to ADL, lead may potentially be present at all of the Alternative 1 through 3 sites in association with facilities such as metal guard rails, piping, bridge components and roadway striping (i.e., LBP). Demolition/removal of such facilities could potentially result in similar hazards as noted above for ADL.

  While the presence and level of lead contamination associated with ADL or other sources as described has not been determined for any of the Alternative 1 through 3 sites, implementation of these alternatives could potentially exceed applicable County standards related to the occurrence of lead contamination.

- Treated Wood Waste: As outlined in Section 2.11, treated wood along roadways is typically associated with facilities such as sign or guardrail posts, three-beam barriers, or

piles. Specifically, wood used for such facilities is often treated with preservative chemicals that may include arsenic, copper, creosote, and pentachlorophenol (a pesticide). Demolition/removal of TWW could potentially result in similar hazards as noted above for ADL. Accordingly, while the presence of TWW has not been determined for any of the Alternative 1 through 3 sites, implementation of these alternatives could potentially exceed applicable County standards related to the occurrence of TWW.

5.10.4 Potential Conditions that Could be Implemented by the County

Section 2.11.4 in this Final EIR identifies potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to buried hazards and exposure to hazardous materials. In additional to those, the following potential condition would address issues associated with exposure to ACM:

- The possible presence of ACM in any facilities associated with the Alternatives 1 through 3 could be addressed by additional assessment in the form of an ACM survey conducted by qualified personnel prior to initiation of demolition or construction activities. This survey could be utilized to confirm the presence or absence of ACM, determine appropriate health and safety requirements for demolition/construction, and identify appropriate handling/disposal methods associated debris, as appropriate.

5.11 AIR QUALITY

5.11.1 Existing Conditions

Existing Setting

Refer to Section 2.12.1 for a discussion of the setting relative to air quality.

Regulatory Framework

In addition to the requirements discussed in Section 2.12 in the Final EIR, air quality plans relevant to this discussion include the State Implementation Plan (SIP) and Regional Air Quality Strategy (RAQS) because these are the planning documents for the San Diego Air Basin (SDAB). The RAQS outlines the plans and control measures of the San Diego Air Pollution Control District (SDAPCD) designed to attain the State air quality standards for ozone. In addition, the SDAPCD has developed its input to the SIP, which includes the SDAPCD's plans and control measures for attaining the federal 8-hour ozone standard. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the standards. Mobile sources are

regulated by the U.S. Environmental Protection Agency and the California Air Resources Board, and the emissions and reduction strategies related to mobile sources are considered in the RAQS and SIP

5.11.2 County Standards

Based on applicable County of San Diego guidelines (County 2007c), County standards related to air quality would be exceeded if the Proposed Project would:

1. Conflict with or obstruct the implementation of the San Diego RAQS and/or applicable portions of the SIP.

2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation, as shown in **Table 5.11-1**.

3. Result in emissions of carbon monoxide (CO) that when totaled with the ambient concentrations will exceed a 1-hour concentration of 20 parts per million (ppm) or an 8-hour average of 9 ppm.

TABLE 5.11-1
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

Pollutant	Total Emissions		
Construction Emissions (Pounds per Day)			
Respirable Particulate Matter (PM_{10})	100		
Fine Particulate Matter ($PM_{2.5}$)	55		
Oxides of Nitrogen (NO_X)	250		
Oxides of Sulfur (SO_X)	250		
Carbon Monoxide (CO)	550		
Volatile Organic Compounds (VOCs)	75		
Operational Emissions			
	Pounds Per Hour	**Pounds per Day**	**Tons per Year**
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	---	55	10
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOC)	---	75	13.7
Toxic Air Contaminant Emissions			
Excess Cancer Risk	1 in 1 million 10 in 1 million with T-BACT		
Non-Cancer Hazard	1.0		
T-BACT = Toxics-Best Available Control Technology			

4. Expose sensitive receptors to substantial pollutant concentrations as follows:

    a. The project places sensitive receptors near CO "hot spots" or creates CO "hot spots" near sensitive receptors.

    b. Project implementation would result in exposure to toxic air contaminants (TACs) resulting in a maximum incremental cancer risk greater than one in one million without application of Toxics-Best Available Control Technology (T-BACT) or a health hazard index greater than one.

5. Generate objectionable odors or place sensitive receptors next to existing objectionable odors that would affect a considerable number of persons or the public.

5.11.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

The Proposed Project does not include any components that would induce population growth. The Proposed Project involves the construction of an access road, as well as improvements to five non-access road intersections. As such, the Project would not generate any new vehicle trips, and correspondingly would not emit any air pollutants during operation. The Project would also not generate air pollutant emissions during construction or operation that exceed associated County standards (see discussion under Standard 2). Therefore, the proposed Project is consistent with applicable local planning documents and would not exceed County standards related to the RAQS or the SIP.

Standard 2

Alternatives 1, 2, and 3

As mentioned previously, the Project would not generate new vehicle trips and would not result in the emission of criteria pollutants during operation. Emissions associated with construction activities would be temporary in nature due to the limited improvements. For the purposes of this analysis, a worst-case construction scenario was assumed that would apply for all Project alternatives. The assumptions include a construction duration of three months, total disturbed area of 10 acres (with 2 acres as the maximum amount disturbed per day), 40 cubic yards of soil import/export, roadway segment length of 0.8 mile, and implementation of standard dust control measures (such as watering twice per day). Based on these assumptions, a worst-case daily emissions estimate was developed (using the Sacramento Metropolitan Air Quality Management

District's Road Construction Emission Model) and is presented in **Table 5.11-2**. As demonstrated, construction associated with the proposed improvements would not generate emissions in excess of the associated County screening level thresholds and would therefore not exceed applicable County standards related to construction or operational emissions.

TABLE 5.11-2
WORST-CASE DAILY CONSTRUCTION EMISSIONS

Source	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	11	116	54	>0.1	26	10
County Screening Level Threshold	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No

VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = suspended particulate matter; $PM_{2.5}$ = fine particulate matter
Modeling assumes watering site twice daily

Standard 3

Alternatives 1, 2, and 3

Refer to Section 2.12.3 in this Final EIR_for a discussion of Project effects related to emissions of CO.

Standard 4

Alternatives 1, 2, and 3

Refer to Section 2.12.3 in this Final EIR for a discussion of Project effects related to creation of CO hot spots.

Diesel particulate matter (PM) would be emitted from construction equipment. As shown in Table 5.11-2, Project-related emissions of PM during construction (which includes equipment emissions) would be below related screening thresholds. Further, because diesel particulates are considered to have long-term health effects and construction would be a short-term event, Project-related emissions would not result in long-term health risks to surrounding receptors from TACs that would exceed County Standard 4.

Standard 5

Alternatives 1, 2, and 3

As described in Section 2.12, Alternatives 1 through 3 could result in Project-related odors associated with construction. Odors would be similar for each of the alternatives and would be temporary, would disperse rapidly with distance from the source, and would not affect a

considerable number of persons or the public. Additionally, the Project would not place sensitive receptors near an existing source of objectionable odors. As such, Project implementation would not exceed County Standard 5 related to objectionable odors.

5.11.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County standards as outlined in the above analyses (as well as in Section 2.12), no conditions related to air quality are identified.

5.12 CLIMATE CHANGE

5.12.1 Existing Conditions

Existing Setting

Refer to Section 2.13 for a discussion of the setting relative to climate change.

Regulatory Framework

Refer to Section 2.13 for a discussion of the regulatory setting relative to climate change.

5.12.2 County Standards

The assessment of climate change impacts is by its nature a cumulative impact, as no individual project has the ability to affect the climate on a global scale. Accordingly, County standards related to climate change would be exceeded if the Proposed Project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

2. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The County of San Diego, in its memorandum entitled "*2015 GHG Guidance – Recommended Approach to Addressing Climate Change in CEQA Documents*" (County 2015) recommends the following guideline to determine if applicable County standards are exceeded:

- A proposed project would have a cumulatively considerable contribution to climate change impacts if it would result in a net increase of construction and operational GHG emissions, either directly or indirectly, and if the project would incorporate mitigation that achieves less than a 16 percent total reduction compared to unmitigated conditions.

The County utilizes a screening-level emission level of 900 MT CO_2e to evaluate whether a project must conduct further analysis. County guidance also recommends including construction emissions (amortized over a typical duration of 20 years) in the screening threshold.

If a project generates more than 900 MT CO_2e per year, GHG emissions are evaluated against the reductions from the "unmitigated" condition. The unmitigated scenario represents a proposed project as described in the application, in compliance with any applicable standards and regulations. The County uses a value of 16 percent below unmitigated conditions to evaluate if GHG emissions from a specific project would exceed the associated County standards.

5.12.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

The Project involves the construction of an access road, as well as improvements to five non-access road intersections. As such, the Project would not generate any new vehicle trips, would not emit any GHGs during operation, and would thus not exceed related County standards for operational GHG.

The Project's construction-related contribution to GHG emissions would primarily result from fuel combustion in construction equipment, construction worker commute trips, and hauling/delivery truck trips. Construction-related GHG emissions result from CO_2, CH_4, and N_2O that are released during the combustion of gasoline or diesel fuel in on- and off-road vehicles and equipment. For the purposes of this analysis, a worst-case construction scenario was assumed that would apply for all Project alternatives (as outlined above in Section 5.10). Based on these assumptions, a total GHG emissions estimate was developed (using Sacramento Metropolitan Air Quality Management District's Road Construction Emission Model). **Table 5.12-1** presents a summary of construction-related GHG emissions. Based on the data shown in Table 5.12-1, construction associated with the proposed improvements would not generate GHG emissions in excess of the related County standards.

Standard 2

Alternatives 1, 2, and 3

As noted above under Standard 1, Project implementation would not generate GHG emissions in excess of applicable County standards. As such, implementation of the Project would therefore also not exceed County standards related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

TABLE 5.12-1
CONSTRUCTION GHG EMISSIONS

Construction Activity	CO_2e
Grubbing/Land Clearing	8
Grading/Excavation/Import	151
Drainage/Utilities/Sub-Grade	55
Paving	15
TOTAL	**229**
Amortized Construction Emissions[1]	11
Screening Threshold[2]	**900**
Exceed County Standard?	***No***

[1] Construction emissions are amortized over 20 years in accordance with County guidance.
[2] County of San Diego 2015

5.12.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County Standards as outlined in the above analyses (as well as in Section 2.13), no conditions related to climate change are identified.

5.13 NOISE

5.13.1 Existing Conditions

Existing Setting

Refer to Section 2.14.1 in this Final EIR for a discussion of the setting relative to noise.

Regulatory Framework

San Diego County General Plan Noise Element

The Noise Element of the County of San Diego General Plan establishes limitations on sound levels to be received by noise sensitive land uses (NSLUs). New development may cause an existing NSLU to be affected by noise caused by the new development, or it may create or locate a NSLU in such a place that it is affected by noise. The Noise Element identifies airports and traffic on public roadways as the major sources of noise. The Noise Element states that an acoustical study is required if it appears that a NSLU would be subject to noise levels of a community noise equivalent level (CNEL) equal to 60 decibels (A) or greater. If that study confirms that greater than 60 dB CNEL would be experienced, modifications that reduce the

exterior noise level to less than 60 dB CNEL and the interior noise levels to below 45 dB CNEL must be made to the development.

County of San Diego Noise Ordinance

The County of San Diego Noise Ordinance establishes prohibitions for disturbing, excessive, or offensive noise, and provisions such as sound level limits for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens. Limits are specified depending on the zoning placed on a property. Where two adjacent properties have different zones, the sound level limit at a location on a boundary between two properties is the arithmetic mean of the respective limits for the two zones, except for extractive industries. It is unlawful for any person to cause or allow the creation of any noise that exceeds the applicable limits of the Noise Ordinance at any point on or beyond the boundaries of the property on which the sound is produced. Furthermore, the Noise Ordinance allows the County to grant variances from the noise limitations for temporary on-site noise sources, subject to terms and conditions intended to achieve compliance. Finally, the Noise Ordinance establishes additional noise limitations for operation of construction equipment.

5.13.2 County Standards

Based on applicable County of San Diego guidelines (County 2009a), County standards related to noise would be exceeded if the Proposed Project would:

1. Expose exterior on- or off-site, existing or reasonably foreseeable future, NSLUs to noise (including road noise) in excess of 60 CNEL for single-family residential uses, 65 CNEL for multi-family residential uses, or an increase of 10 CNEL or more over existing noise levels. If existing (ambient) conditions exceed the noted County noise level standards, a direct impact to off-site uses would occur if the project increases the existing (ambient) noise level by more than 3 dBA CNEL).

2. Expose interior on- or off-site, existing or reasonably foreseeable future, NSLUs to noise in excess of 45 CNEL.

   Because traditional architectural materials are normally able to reduce exterior to interior noise by up to 15 dBA, interior noise impacts may occur if the project results in exterior noise levels for residential land uses that exceed 60 CNEL.

3. Generate construction noise that exceeds the standards listed in the San Diego County Code, Section 36.409, Sound Level Limitations on Construction Equipment.

   Except for emergency work, it is unlawful for construction equipment noise to exceed an average sound level of 75 dBA for an 8-hour period, between 7:00 a.m. and 7:00 p.m.,

when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

4. Subject residences to ground-borne vibration that exceeds the following limits:

    - Isolated events (e.g., blasting) shall not exceed 1 inch per section (in/sec) peak particle velocity (PPV);
    - Non-transportation vibration sources such as impact pile drivers or hydraulic breakers shall not exceed 0.1 in/sec PPV;
    - Other construction sources shall not exceed the "severe" criteria, as specified by Caltrans (2004), for residences of 0.4 in/sec PPV.

5.13.3 Compliance with County Standards

Standard 1

Non-Access Road Intersection Improvements: Alternatives 1, 2, and 3

The proposed intersection improvements would be the same under all of the Project alternatives. The results of the noise modeling for the existing conditions at each modeled noise receiver are presented in Table 2.14-3 in this Final EIR. As shown in Table 2.14-3, the existing exterior noise levels for single-family residential uses ranges from 36 dBA L_{EQ} to 60 dBA L_{EQ}.[4] Currently, none of the receivers in the vicinity of the intersections are exposed to noise levels that exceed the County Guidelines (60 CNEL for single-family residences, 65 CNEL for childcare facilities).

The Project itself would not generate trips; however, the reconfiguration of the lanes at the five intersections may decrease the distance from the roadway to surrounding receivers. **Table 5.13-1** compares the future traffic noise levels due to the reconfigured non-access road intersections that would occur with and without implementation of the Project. The results of this table show the incremental difference in noise levels that would occur directly from the implementation of the intersection improvements, without consideration of additional traffic

[4] For the purposes of this analysis, the model-calculated peak-hour L_{EQ} noise output is the equivalent to the CNEL (Caltrans Technical Noise Supplement, November 2009).

TABLE 5.13-1
2035 NOISE LEVELS FOR NO PROJECT AND PROJECT NON-ACCESS INTERSECTION IMPROVEMENTS

Receiver	Land Use	No Project dBA L_{eq}	2035 With Project dBA L_{eq}	2035 Change vs No Project dBA L_{eq}
R-26	Church	63	64	1
R-27	Vacant Commercial	74	74	0
R-28	Retail	70	70	0
R-29	Retail	68	68	0
R-30	Retail	77	77	0
R-31	Retail	76	76	0
R-32	Retail	71	71	0
R-33	Retail	72	72	0
R-34	Industrial	70	70	0
R-35	Dinning	60	60	0
R-36	Dinning	58	58	0
R-37	Retail	56	56	0
R-38	Sports Field	53	53	0
R-39	Residential	63	63	0
R-40	Residential	62	62	0
R-41	Residential	62	62	0
R-42	Retail	72	72	0
R-43	Residential	58	58	0
R-44	Retail	71	71	0
R-45	Retail	71	72	1
R-46	Residential	55	54	-1
R-47	Retail	73	73	0
R-48	Retail	69	69	0
R-49	Retail	63	63	0
R-50	Residential	53	53	0
R-51	Residential	59	59	0
R-52	Residential	39	39	0
R-53	Retail	71	71	0
R-54	Day Care	60	60	0
R-55	Retail	62	62	0
R-56	Residential	57	57	0
R-57	Residential	52	52	0
R-58	Retail	62	62	0
R-59	Retail	43	43	0

from future growth. At all residential locations, the Project would not increase existing noise levels, while at one residential location the Project would decrease the noise level by 1 dBA. As a result, implementation of the non-access road intersection improvements under Alternatives 1 through 3 would not exceed applicable County standards related to exterior on- or off-site noise levels.

Access Road Improvements

Alternative 1: Reservation Road Access Alignment

As shown in Table 2.14-4, the existing exterior noise levels for the modeled single-family residential uses range from 42 dBA to 62 dBA CNEL. One of the receivers, R6, is currently exposed to noise levels (62 CNEL) that exceed the County Guidelines (60 CNEL for single-family residences).

Table 5.13-2, shows the incremental difference in noise levels that would occur directly from the implementation of the access road improvements, without consideration of additional traffic from future growth. With implementation of Alternative 1, the noise level at R6 would decrease by 1 dBA as a result of the access road alignment. At all other residential locations, Alternative 1 would either have no effect on the noise levels, or increase them by 1-2 dBA. Accordingly, implementation of the access road improvements under Alternative 1 would not exceed applicable County standards related to exterior on- or off-site noise levels.

Alternative 2: Daisy Drive Access Alignment

As shown in **Table 5.13-2**, the implementation of Alternative 2 would decrease the noise level at R6 by 1 dBA as a result of the access road alignment. At all other residential locations, Alternative 2 would either have no effect on the noise levels, or increase them by 1-3 dBA. When compared to existing conditions, these locations would remain below 60 CNEL. Based on these data, implementation of the access road improvements under Alternative 2 would not exceed applicable County standards related to exterior on- or off-site noise levels.

Alternative 3: Melody Road Access Alignment

As shown in Table 5.13-2, the implementation of Alternative 3 would not increase the noise level at R6 as a result of the Melody Road access alignment. At all other residential locations, Alternative 3 would either have no effect on the noise levels, or increase them by 1-4 dBA. When compared to existing conditions, these locations would remain below 60 CNEL.

As a result, implementation of the access road intersection improvements under Alternative 3 would not exceed applicable County standards related to exterior on- or off-site noise levels.

TABLE 5.13-2
2035 NOISE LEVELS FOR NO PROJECT AND PROJECT ACCESS ROAD ALTERNATIVES

Receiver ID	Location or Address	Land Use	No project dBA L_{eq}	Alternative 1 dBA L_{eq}	Change vs No Project dBA L_{eq}	Alternative 2 dBA L_{eq}	Change vs No Project dBA L_{eq}	Alternative 3 dBA L_{eq}	Change vs No Project dBA L_{eq}
R1	13967 Highway 94	Commercial	63	63	0	63	0	63	0
R2	13975 Highway 94	Commercial	63	63	0	63	0	63	0
R3	14022 Hillside Dr	Residential	54	53	-1	53	-1	54	0
R4	14017 Hillside Dr	Residential	57	57	0	57	0	57	0
R5	14022 Highway 94 A	Residential	57	56	-1	56	-1	57	0
R6	14022 Highway 94 B	Residential	63	62	-1	62	-1	63	0
R7	14019 Highway 94	Commercial	65	64	-1	64	-1	65	0
R8	14075 Short Ct	Residential	56	56	0	56	0	56	0
R9	14027 Hillside Dr	Residential	56	56	0	56	0	56	0
R10	14024 Highway 94	Residential	57	57	0	57	0	57	0
R11[1]	14023 Campo Dr	Residential	56	56	0	56	0	56	0
R12[2]	14043 Highway 94	Residential	51	51	0	52	1	52	1
R13	14051 Campo Rd	Residential	57	58	1	58	1	58	1
R14[3]	14061 Campo Rd	Residential	43	44	1	44	1	44	1
R15[2]	14018 Las Palmas Rd	Residential	58	58	0	58	0	58	0
R16	14013 Las Palmas Rd	Residential	57	57	0	57	0	57	0
R17[4]	14031 Las Palmas Rd	Residential	51	53	2	54	3	55	4
R18	14066 Highway 94	Residential	55	56	1	57	2	58	3
R19[5]	3023 Calle Mesquite	Residential	48	49	1	49	1	51	3
R20[6]	3015 Calle Mesquite	Residential	50	50	0	50	0	53	3
R21	3007 Calle Mesquite	Residential	53	53	0	53	0	56	3
R22	14024 Peaceful Valley Ranch Rd	Fire Station	59	61	2	61	2	59	0
R23	14102 Peaceful Valley Ranch Rd	Residential	43	44	1	44	1	44	1
R24	44114 Campo Rd	Residential	47	48	1	47	0	47	0
R25	Jamul Reservation Church	Religious	47	47	0	48	1	48	1

Standard 2

Non-Access Road Intersection Improvements: Alternatives 1, 2, and 3

As noted under Standard 1, the proposed intersection improvements would be the same under all of the Project alternatives. The results of the noise modeling for each intersection are presented in Table 2.14-3 in this Final EIR. Table 5.13-1 shows the incremental difference that would occur directly from implementation of the intersection improvements. At all residential locations, the Project would not increase existing noise level, while at one residential location the Project would decrease the noise level by 1 dBA. Accordingly, implementation of the non-access road improvements under Alternatives 1 through 3 would not exceed applicable County standards related to interior on- or off-site noise levels.

Access Road Improvements

Alternative 1: Reservation Road Access Alignment

As shown in Table 5.13-2, Under Alternative 1, the exterior (and corresponding interior) noise level at residential location R6 would decrease by 1 dBA as a result of the access road alignment. At all other residential locations, Alternative 1 would either have no effect on the noise levels, or increase them by 1-2 dBA. When compared to existing conditions, these locations would remain below 60 CNEL. Accordingly, implementation of the access road improvements under Alternative 1 would not exceed applicable County standards related to interior on- or off-site noise levels. *Alternative 2: Daisy Drive Access Alignment*

As shown in Table 5.13-2, the implementation of Alternative 2 would decrease the exterior (and corresponding interior) noise level at R6 by 1 dBA as a result of the access road alignment. At all other residential locations, Alternative 2 would either have no effect on the exterior noise levels, or increase them by 1-3 dBA. When compared to existing conditions, these locations would remain below 60 CNEL. Based on these data, implementation of the access road improvements under Alternative 2 would not exceed applicable County standards related to interior on- or off-site noise levels.

Alternative 3: Melody Road Access Alignment

As shown in Table 5.13-2, the implementation of Alternative 3 would not increase the exterior (and corresponding interior) noise level at R6 as a result of the Melody Road access alignment. At all other residential locations, Alternative 3 would either have no effect on the noise levels, or increase them by 1-4 dBA. When compared to existing conditions, these locations would remain below 60 CNEL. As a result, implementation of the access road intersection improvements under Alternative 3 would not exceed applicable County standards related to interior on- or off-site noise levels.

Standard 3

Non-Access Road Intersection Improvements: Alternatives 1, 2, and 3

As stated in Section 2.14, construction noise would be generated by construction equipment used for site preparation and grading, removal of existing pavement and paving, and transport trucks.

Maximum noise levels may be 85 to 90 dBA at a distance of 50 feet during most construction activities. Of the five intersection locations, the nearest of the noise-sensitive receivers is located approximately 100 feet from construction activity that would occur at the SR-94/Steele Canyon Road intersection. At this distance, construction noise levels would attenuate to 68 dBA Leq or less. As a result, implementation of the non-access road intersection improvements under Alternatives 1 through 3 would not exceed applicable County standards related to construction noise limits.

Access Road Improvements: Alternatives 1, 2, and 3

The nearest receiver to the access road improvements for Alternatives 1 through 3 is the residence represented by R6, which is approximately 60 feet from the center of proposed construction activities at the north end of the Project limits. Hourly construction noise levels at this distance would attenuate to 73 dBA Leq or less. Accordingly, implementation of the access road improvements under Alternatives 1 through 3 would not exceed applicable County standards related to construction noise limits.

Standard 4

Alternatives 1, 2, and 3

Project-related construction is not expected to utilize any pile driving or blasting activities. The most likely source of vibration during the Project construction would be a vibratory roller. A vibratory roller creates a peak particle velocity (PPV) of approximately 0.210 inches/second (sec) at a distance of 25 feet.

The County provides for the use of the Caltrans standards (2004) for construction vibration impacts in the footnotes of Table 4 in applicable County guidelines (County 2009a). The noted level of 0.210 inches/sec PPV for a vibratory roller at 25 feet would be less than the Caltrans criterion of 0.4 inches/sec PPV, which is identified as a "severe" level. In addition, it is expected that, if used, vibratory rollers would be operating at a distance greater than 25 feet from the nearest occupied residence. Based on the described considerations, although vibration may be perceptible by nearby residences, project implementation would not exceed applicable County standards related to vibration levels associated with vibratory rollers (and other potential equipment).

5.13-4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County standards as outlined in the above analyses (as well as in Section 2.14), no conditions related to noise and vibration issues are identified.

5.14 BIOLOGICAL RESOURCES

5.14.1 Existing Conditions

Existing Setting

Refer to Sections 2.16 through 2.21 in this Final EIR for a discussion of the setting relative to biological resources.

Regulatory Framework

In addition to the regulatory requirements identified in Sections 2.16 through 2.21 of this Final EIR, components of the Project that would be located outside of the Caltrans ROW could potentially be subject to the County of San Diego Resource Protection Ordinance (RPO). The County regulates natural resources (among other resources) via the RPO, the regulations of which cover wetlands, riparian habitats, sensitive plants and animals, sensitive habitats, and habitats containing sensitive animals or plants as sensitive biological resources.

5.14.2 County Standards

Based on applicable County of San Diego guidelines (County 2010), County standards related to biological resources would be exceeded if:

Riparian Habitat and Other Sensitive Natural Communities

1. Project-related grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat (as listed in Table 5 in the County Biological Guidelines, excluding those without a mitigation ratio) on or off the Project site.

2. Any of the following would occur to or within jurisdictional wetlands, channels, and/or riparian habitats as defined by the USACE, CDFW, and County: vegetation removal; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; road crossing construction; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.

Special Status Species

3. The Project would impact one or more individuals of a species listed as federally or state endangered or threatened.

4. The Project would impact an on-site population of a County List A or B plant species, County Group 1 animal species or State Species of Special Concern.

5. The Project would impact the local long-term survival of a County List C or D plant species or a County Group 2 animal species.

6. The Project would impact occupied Hermes copper butterfly habitat.

7. The Project would result in a loss of functional foraging habitat for raptors.

8. The Project would impact nesting success of the following sensitive bird species through grading, clearing, fire fuel modification and/or other noise generating activities such as construction:

    - Coastal California gnatcatcher
    - Least Bell's vireo
    - Southwestern willow flycatcher
    - Tree-nesting raptors
    - Ground-nesting raptors

9. The Project would cause indirect impacts, particularly at the edge of proposed development adjacent to proposed or existing open space or other natural habitat areas, to levels that would likely harm sensitive species over the long term.

Wildlife Movement

10. The Project would substantially interfere with connectivity between blocks of habitat, or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.

Local Policies, Ordinances, and Adopted Plans

11. The Project would conflict with any local policies or ordinances protecting biological resources, such as the tree preservation policy or ordinance, or conflict with the

provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan.

5.14.3 Compliance with County Standards

Standard 1

Alternatives 1, 2, and 3

Improvements to SR-94/Jamacha Road intersection would temporarily impact 0.5 acre of southern willow riparian scrub, SR-94/Maxfield Road intersection would permanently impact 0.69 acre of Diegan coastal sage scrub and improvements to SR-94/Lyons Valley Road intersection would permanently impact 0.1 acre of southern coast live oak riparian forest; these impacts could exceed County standards associated with sensitive vegetation communities.

The Project would impact between 0.25 to 7.07 acres of sensitive vegetation communities, including southern coast live oak riparian forest, Diegan coastal sage scrub, and non-native grassland (refer to Figures 2.16-1 through 2.16-5). A summary of impacts to sensitive vegetation communities by Project alternative is provided in **Table 5.14-1**. Based on the described conditions, Project implementation under Alternatives 1 through 3 would exceed County standards associated with sensitive vegetation communities.

TABLE 5.14-1
ACCESS ROAD IMPACTS TO SENSITIVE VEGETATION COMMUNITIES

Vegetation Community	Impacts (acres)*				
	Alt. 1: Reservation Road	Alt. 2: Daisy Drive			Alt. 3: Melody Road
		Preferred Alt. - Option 1; Full Footprint	Option 2; Reduced Footprint	Option 3; Minimum Footprint	
Temporary Impacts					
Southern coast live oak riparian forest	0.06	0.02	0.03	0.06	0.14
Diegan coastal sage scrub	0.03	--	--	--	--
Non-native grassland	0.48	0.30	0.52	0.09	1.68
Subtotal	**0.57**	**0.32**	**0.55**	**0.15**	**1.82**
Permanent Impacts					
Southern coast live oak riparian forest	0.22	0.11	0.25	0.03	0.57
Diegan coastal sage scrub	0.05	0.00			
Non-native grassland	0.95	0.43	0.82	0.07	4.68
Subtotal	**1.22**	**0.54**	**1.07**	**0.10**	**5.25**
TOTAL	**1.79**	**0.86**	**1.62**	**0.25**	**7.07**

Standard 2

Alternatives 1, 2, and 3

The locations of waters of the U.S. and waters of the State are shown in Figures 2.16-1 through 2.16-3 of the Final EIR. Note that riparian habitats are included in the jurisdiction of waters of the State and are protected under the County RPO. Impacts to jurisdictional waters would occur at the SR-94/Jamacha Road intersection due to installation of the proposed retaining wall at the edge of Jamacha channel. The impacts are estimated at 3 square feet of permanent impacts and 1,369 square feet of temporary impacts to Jamacha channel; 0.05 acre of southern willow riparian scrub would also be temporarily impacted due to the need to trim vegetation. Impacts to riparian habitat would occur at the SR-94/Lyons Valley Road intersection due to vegetation clearing. The impacts are estimated at 0.1 acre of southern coast live oak riparian forest. These impacts could exceed County standards associated with jurisdictional water resources.

Under all three Project alternatives, impacts to jurisdictional waters would occur at the SR-94/Jamacha Road intersection due to installation of the proposed retaining wall. In addition, construction of most of the Project alternatives would require the placement of fill or structures in Willow Creek to extend the culvert bridge at Melody Road. The exception is Alternative 2: Option 1, which will employ a bottomless culvert at Melody Road; this will avoid placing any new fill in the Willow Creek channel. Alternative 3 would also require three additional channel crossings to build the proposed access road.

Federal Jurisdictional Areas

The Project would impact between 0.01 and 0.12 acre of waters of the U.S. (limited to channels), depending on the alternative. Refer to **Table 5.14-2** for a breakdown of impacts by Project alternative. These impacts could exceed County standards associated with jurisdictional water resources.

State Jurisdictional Areas and County RPO Wetlands and Riparian Habitats

The Access Project would impact between 0.12 and 0.83 acre of waters of the State (depending on the alternative), consisting of riparian habitat and channels. Refer to Table **5.14-3** for a breakdown of impacts by Project alternative. The impacted riparian habitat meets the definition of County RPO riparian habitat. These impacts could exceed County standards associated with jurisdictional water resources.

TABLE 5.14-2
ACCESS ROAD IMPACTS TO USACE JURISDICTIONAL AREAS

Waters of the U.S.**	Impacts (acre)*				
	Alt. 1: Reservation Road	Alt. 2: Daisy Drive			Alt. 3: Melody Road
		Preferred Alt. - Option 1; Full Footprint	Option 2; Reduced Footprint	Option 3; Minimum Footprint	
Temporary Impacts					
Channels	0.01	0.01	0.01	0.01	0.02
Permanent Impacts					
Channels	0.05	0	0.05	0.02	0.10
TOTAL	**0.06**	**0.01**	**0.06**	**0.03**	**0.12**

** No impacts to USACE jurisdictional wetlands would occur.

TABLE 5.14-3
ACCESS ROAD IMPACTS TO STATE JURISDICTIONAL AREAS

Waters of the State**	Impacts (acre)*				
	Alt. 1: Reservation Road	Alt. 2: Daisy Drive			Alt. 3: Melody Road
		Preferred Alt. – Option 1; Full Footprint	Option 2; Reduced Footprint	Option 3; Minimum Footprint	
Temporary Impacts					
Riparian habitat	0.06	0.02	0.03	0.06	0.14
Channels	0.01	0.01	0.01	0.01	0.02
Subtotal	**0.07**	**0.03**	**0.04**	**0.07**	**0.16**
Permanent Impacts					
Riparian habitat	0.22	0.11	0.25	0.03	0.57
Channels	0.05	0	0.05	0.02	0.10
Subtotal	**0.27**	**0.11**	**0.30**	**0.05**	**0.67**
TOTAL	**0.34**	**0.14**	**0.34**	**0.12**	**0.83**

** No impacts to CDFW jurisdictional wetlands would occur.

Areas are considered County wetlands if they meet at least one of the following attributes pursuant to the County RPO (County 2007): (1) at least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places); (2) the substratum is predominantly undrained hydric soil; or (3) an ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system. No impacts to wetlands will occur from implementation of the intersection improvements or Alternatives 1, 2, or 3.

Based on the above analyses, implementation of Alternatives 1 through 3 would not exceed County standards related to RPO wetlands.

Standards 3 through 6

Alternatives 1 and 2

At the SR-94/Jamacha Rd. intersection, stands of Palmer's goldenbush (a State Species of Special Concern, County List B species, and Narrow Endemic Plant Species under the MSCP) are present. Construction of this intersection improvement would impact approximately 2,250 square feet of Palmer's goldenbush. As a result, implementation of this intersection improvement would exceed County standards related to special status species for Palmer's goldenbush.

As discussed in Section 2.20, protocol surveys were conducted for Quino checkerspot butterfly (a federally listed as endangered species), Hermes copper butterfly (a candidate species for federal listing), coastal California gnatcatcher (a federally listed as threatened species), and least Bell's vireo (a federally and state listed as endangered species). None of these species were observed or detected in the Project BSAs. In addition, no suitable habitat for the southwestern willow flycatcher is present within or near the Project BSAs.

Alternatives 1 and 2, however, would result in impacts to suitable habitat of the coastal California gnatcatcher (Diegan coastal sage scrub) and least Bell's vireo (riparian habitat within the riparian corridor near the SR-94/Jamacha Road intersection, Natural Investigations Co., LLC 2014). As a result, Project implementation under Alternatives 1 and 2 could exceed County standards related to special status species if coastal California gnatcatcher or least Bell's vireo are present in suitable habitat during construction activities. Construction of the Project could also potentially result in the destruction of active migratory bird nests and/or eggs (per the Migratory Bird Treaty Act [MBTA]). Breeding migratory birds may temporarily or permanently leave their territories to avoid the Project, which could lead to reduced reproductive success and increased mortality. Accordingly, Project-related construction under Alternatives 1 and 2 could exceed County standards related to species covered by the MBTA.

Alternative 3

Similar to Alternatives 1 and 2, no listed species were observed or detected within the Project BSAs. Alternative 3 would impact a stand of approximately 24 square feet of Palmer's goldenbush. As a result, implementation of Alternative 3 (Melody Road Access Alignment) would exceed County standards related to special status species for Palmer's goldenbush.

In addition, although Quino checkerspot butterfly and Hermes copper butterfly were not observed during protocol surveys, suitable habitats for both species occur within the BSA for the

Alternative 3 Access Alignment. Accordingly, removal of this habitat under Alternative 3 could exceed County standards. As with Alternatives 1 and 2, construction of Alternative 3 improvements could also potentially result in the destruction of active migratory bird nests and/or eggs. Therefore, Project-related construction under Alternative 3 could exceed County standards related to species covered by the MBTA.

Standard 7

Alternatives 1, 2, and 3

As shown in Table 5.14-1, temporary and permanent impacts would occur to raptor foraging habitat (i.e., non-native grassland) under all Project alternatives. Temporary impacts to non-native grassland would range between 0.09 to 1.68 acres and permanent impacts would range between 0.07 and 4.68 acres, depending on the Project alternative. As a result, Project implementation under Alternatives 1 through 3 would exceed County standards related to raptor foraging habitat.

Standard 8

Alternatives 1, 2, and 3

As stated above, no suitable habitat for the southwestern willow flycatcher is present within or near the Project BSAs. All of the Project alternatives could, however, result in indirect noise impacts to nesting coastal California gnatcatcher and least Bell's vireo, if such species occupy adjacent suitable habitat near the construction zones. In addition, if nesting raptors occur within the vicinity of the construction areas, indirect noise impacts to raptors could occur. Accordingly, Project implementation under Alternatives 1 through 3 could exceed County standards related to nesting sensitive bird species.

Standard 9

Alternatives 1and 2

Noise

As stated in Section 2.19, construction activities associated with all of the Project alternatives would increase noise above ambient levels, which could temporarily impact wildlife by disrupting normal behavior. Construction would not cause long-term impacts because construction would be temporary and the majority of construction activities would be limited to daytime hours, which are less noise sensitive. Common wildlife species in the vicinity of the construction areas may be affected, but the duration of construction would be short enough such that related County standards would not be exceeded under Alternatives 1 and 2 (Natural Investigations Co., LLC 2014).

Operation of Project Alternatives 1 and 2 would not result in the increase of traffic; therefore, no additional noise sources would be present and related County standards would not be exceeded.

Nighttime Lighting

Nighttime construction could occur under any of the Project alternatives, and such activities could exceed related County standards for sensitive wildlife species. Operation of the Project would not result in additional nighttime lighting other than the three new traffic signals. No new substantial source of nighttime lighting would be added to the area; therefore, County standards related to lighting and sensitive wildlife species would not be exceeded for operations under Alternatives 1 and 2.

Roadkill

Project Alternatives 1 and 2 (Options 1 through 3) would not contribute to an increase in roadkill, as these alternatives would not increase the number or speed of vehicles on roadways. Accordingly, County standards related to roadkill would not be exceeded under Alternatives 1 and 2.

Invasive Plant Species

As stated in Section 2.21, construction of any portion of the Project alternatives has the potential to introduce or encourage the spread of invasive plant species by (1) transport to the Project site by construction equipment and/or (2) use of erosion control hydroseed containing weed seeds. As a result, implementation of Alternatives 1 and 2 could exceed related County standards for invasive plant species.

<u>Alternative 3</u>

Noise

Construction-related noise impacts to biological resources for Alternative 3 would be the same as those discussed above for Alternatives 1 and 2, with related County standards not exceeded. Operation of Alternative 3, however, would introduce a new road within a sensitive biological area (designated as Hardline Preserve, as discussed below under Standard 11). Construction of this new road would therefore exceed County standards associated with noise effects to sensitive species.

Nighttime Lighting

Construction-related lighting impacts to biological resources for Alternative 3 would be the same as discussed above for Alternatives 1 and 2, and could exceed related County standards for sensitive wildlife species. Nighttime lighting impacts associated with operation of Alternative 3

would also be the same as identified above for Alternatives 1 and 2, with County standards related to lighting and sensitive wildlife species not exceeded for operations under Alternative 3.

Roadkill

Operation of the Alternative 3 Access Alignment (Melody Road) would involve a new road that traverses land designated as MSCP Hardline Preserve that contains the Willow Creek wildlife corridor. The Alternative 3 access road would cross Willow Creek and introduce a new barrier for wildlife movement. Traffic along the new roadway that bisects this wildlife corridor could result in increased roadkill due to wildlife crossing the new access road. As a result, County standards related to roadkill could be exceeded under Alternative 3.

Invasive Plant Species

Potential impacts associated with invasive plant species under Alternative 3 would be the same as identified above for Alternatives 1 and 2, and related County standards for invasive plant species could be exceeded under Alternative 3.

Standard 10

<u>Alternatives 1 and 2</u>

Several wildlife corridors exist within the vicinity of the Project BSAs, including Willow Creek riparian corridor, Jamul Creek riparian corridor, CDFW preserve areas (Rancho Jamul Ecological Reserve and Hollenbeck Canyon Wildlife Area), Sweetwater River floodplain and its tributaries (including the unnamed tributary at the SR-94/Jamacha Road intersection), Steele Canyon riparian corridor, Proctor Valley drainage, and undeveloped lands in the Jamul and San Miguel Mountains (including units of the San Diego National Wildlife Refuge complex; refer to Figures 14a through 14d in the NES [Natural Investigations Co., LLC 2014]). Busy roadways (primarily SR-94) and associated fences create barriers and sources of mortality. Culverts under roads and bridges, such as the bridge at Melody Road, allow some wildlife movement under SR-94; thus the Willow Creek riparian corridor within the BSA functions to a limited extent as a wildlife corridor, although the corridor terminates abruptly with the presence of urbanization in the Community of Jamul.

Construction of Alternatives 1 and 2 would not involve the erection of fencing, walls, or other wildlife barriers, with the exception of installing retaining walls at the intersections of SR-94/Melody Road and SR-94/Jamacha Road (which would include replacement of existing barbed wire fencing, chain-link fencing, and/or artificial slopes [rip-rap]). The erection of these retaining walls would result in a beneficial impact, because the walls would discourage animals from entering the SR-94 ROW and instead encourage wildlife to stay in the stream corridor or

cross underneath existing culverts and bridges. Furthermore, the use of retaining walls would reduce the Project footprint compared to the use of cut-and-fill slopes.

It should also be noted that existing storm water collection features (primarily pipe culverts) in the Project area and vicinity provide some passage for small animals. There are three existing culverts crossing the BSA that would be replaced with larger, upgraded culverts to accommodate existing and any additional storm water flows from Project improvements under any of the alternatives. The upgraded culverts would maintain or increase the heights of current under-road passageways for animals, which would result in a net increase in the size of wildlife corridors within the BSA.

Based on the foregoing analysis, construction and operation of Alternatives 1 and 2 (Options 1, 2, and 3) would not exceed County standards related to wildlife corridors or movements.

Alternative 3

Construction of Alternative 3 would require the construction of a new road in a sensitive area designated as a MSCP Hardline Preserve area that contains the Willow Creek wildlife corridor. Construction of the Alternative 3 access road would cause habitat fragmentation, restrict wildlife movement, and reduce the utility of Willow Creek as a wildlife corridor. Accordingly, implementation of Alternative 3 would exceed County standards related to the Willow Creek wildlife corridor and related wildlife movement.

Standard 11

Alternatives 1, 2, and 3

County Multiple Species Conservation Program

In 1997, the County adopted the MSCP South County Subarea Plan as part of a larger Natural Communities Conservation Program to provide long-term habitat conservation for a variety of sensitive habitats and species (County 1997). A small portion of the Project BSAs are located within the Metro-Lakeside-Jamul Segment and South County Segment of the County's MSCP Subarea Plan (the majority of the Project is located within the Caltrans ROW, which is not subject to the MSCP). Four County MSCP Subarea Plan designations occur within the Project BSAs: Pre-Approved Mitigation Area (PAMA), Hardline Preserve, Minor Amendment Area, and Take Authorized Area (refer to Figures 17a and 17b in the NES; Natural Investigations Co., LLC 2014). Regulations associated with the different MSCP designations occurring within the BSAs are summarized below.

Metro-Lakeside-Jamul Segment: The non-access road intersection improvements are within this segment. Some areas are designated as Minor Amendment Areas and others are designated as

Take Authorized Areas. Within Minor Amendment Areas, a Minor Amendment to the MSCP would need to be granted by the County before development could occur. In Take Authorized Areas, the take of covered species and their habitats are authorized for projects that meet the requirements of the BMO and conformance with the terms of the Subarea Plan. The BMO contains guidelines for all projects subject to County discretionary authority.

South County Segment: The access road alternatives are within this MSCP segment. This segment is separated into two designations: Take Authorized Areas and Multiple Habitat Planning Areas (MHPAs). MHPAs include Hardline Preserve areas and PAMAs. Within Take Authorized Areas, projects must conform to the BMO and the Subarea Plan. Land uses within the MHPA preserve areas are generally very limited. Some examples of land uses that may be authorized include hand clearing of vegetation for fuel management, habitat restoration, noxious weed control, scientific studies, and recreational trails.

Areas designated as a PAMA or Hardline Preserve are considered Biological Resource Core Areas (BRCAs). A PAMA is defined as "an area identified with high biological value in which conservation will be encouraged. This will be done by providing mitigation ratios that favor developing outside of the PAMA and mitigating inside the PAMA." BRCAs also include lands that are ranked high or moderate in quality in the County's Habitat Evaluation Model. The access road alternatives BSAs are within a BRCA because the area is designated PAMA and Hardline Preserve, and has areas ranked high or moderate in habitat quality. None of the proposed non-access road intersection BSAs are located with areas that qualify as BRCAs.

Hardline Preserve areas represent precise preserve boundaries established by the MSCP Subarea Plan. In general, the Hardline Preserve designation limits potential development by precluding grading, excavation, vegetation clearing, and construction of any buildings or structures.

As described in the County's MSCP Subarea Plan, Minor Amendment Areas "…contain habitat that could be partially or completely eliminated (with appropriate mitigation) without significantly affecting the overall goals of the County's MSCP Subarea Plan." Minor Amendment Areas must meet the criteria and achieve the goals of linkages and corridors described in the County MSCP Subarea Plan, consistent with applicable requirements of the BMO. Development within Minor Amendment Areas requires approval from the USFWS Field Office Supervisor, the CDFW NCCP Program Manager, and the County.

Projects must also conform to the BMO and the Subarea Plan within Take Authorized Areas. The BMO contains guidelines all projects subject to County discretionary authority. In Take Authorized Areas, the take of covered species and their habitats is authorized for projects that meet the requirements of the BMO and conform with the terms of the Subarea Plan.

Construction of any Project alternative would require the removal of natural habitat that is protected under the MSCP. Impact acreages to MSCP designations are summarized in

Table 5.14-4. The Project would impact between 0.02 and 3.75 acres of the 8,395.7 acres of Hardline Preserve within the County's MSCP Subarea (or less than 0.01 percent). Based on the described conditions, along with MSCP requirements to address associated impacts, Project implementation under any of the identified alternatives would not exceed County standards associated with the MSCP.

TABLE 5.14-4
ACCESS ROAD IMPACTS TO MSCP LANDS

MSCP Designations	Impacts (acres)*				
		Alt. 2: Daisy Drive			
	Alt. 1: Reservation Road	Preferred Alt. – Option 1; Full Footprint	Option 2; Reduced Footprint	Option 3; Minimum Footprint	Alt. 3: Melody Road
South County Segment					
Hardline Preserve	0.41	0.28	0.05	0.02	3.75
PAMA	--	0.18	0.49	0.06	1.05
Take Authorized Area	--	--	--	--	0.41
Subtotal	**0.41**	**0.46**	**0.54**	**0.08**	**5.21**
Metro-Lakeside-Jamul Segment					
Minor Amendment Area	0.03	0.03	0.03	0.03	0.03

TABLE 5.14-4 cont.
ACCESS ROAD IMPACTS TO MSCP LANDS

Take Authorized Area	2.76	1.13	2.17	2.11	2.90
Subtotal	**2.79**	**1.16**	**2.20**	**2.14**	**2.93**
TOTAL	**3.20**	**1.62**	**2.74**	**2.22**	**8.14**

* The impact acreages under each alternative represent both the access alternative impacts and the other intersection improvements.

County Resource Protection Ordinance

The County regulates natural resources (among other resources) via the RPO, the regulations of which cover wetlands, riparian habitats, sensitive plants and animals, sensitive habitats, and habitats containing sensitive animals or plants as sensitive biological resources. Wetland habitats are defined per the RPO, as described above under Standard 2. Sensitive habitat lands are identified by the RPO as lands that "support unique vegetation communities, or habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the CEQA Guidelines." It is the intent of the RPO to increase the preservation and protection of the County's unique topography, natural beauty, biological diversity, and natural and cultural resources. No RPO sensitive habitat lands occur within the Project BSAs.

The Project alternatives, however, would impact County RPO riparian habitat and jurisdictional channels (refer to Standard 2). Proposed impacts to RPO riparian habitat would be consistent with the findings in RPO Section 86.604(a)(5), because impacts to RPO riparian habitat adjacent to SR-94 near the intersection of SR-94/Jamacha Road and SR-94/Lyons Valley Road are unavoidable. That is, improvements to these existing intersections are a required part of the Project, and there is no feasible alternative that avoids the RPO riparian habitat because of its location directly adjacent to the existing roadway.

Additional impacts to RPO riparian habitat and channels would occur under all three access road alternatives, due to a necessary road crossing to access the Jamul Indian Village Gaming Facility project site and associated road improvements along Melody Road. The proposed road improvements would provide primary access from SR-94, and would cross RPO riparian habitat and channel(s) to provide necessary ingress/egress for the Jamul Indian Village Gaming Facility project site. No feasible alternatives are available to avoid the riparian habitat and channels due to siting constraints. Specifically, alternate access routes are infeasible due to the presence of Willow Creek and its tributaries between SR-94 and the Jamul Indian Village Gaming Facility project site. The exception is the Alternative 2: Option 1 Access alignment, which employs a bottomless culvert at Melody Road. This bottomless culvert removes existing fill in the Willow Creek channel and avoids any new impacts to the channel, as well as reduces the total acreage of riparian habitat impact.

Based on the above analysis, Project implementation would exceed County standards related to RPO riparian habitat and channels, as discussed above under Standard 2.

5.14.4 Potential Conditions that Could be Implemented by the County

Alternatives 1 and 2

Sections 2.16 through 2.21 in this Final EIR identify potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to biological resources.

In addition, the following potential conditions supplement those contained in Sections 2.16 through 2.21:

- Impacts to sensitive vegetation communities (southern coast live oak riparian forest, Diegan coastal sage scrub, and non-native grassland) could be addressed through replacement at the ratios presented in **Table 5.14-5** (in conformance with the BMO and MSCP).

TABLE 5.14-5
POTENTIAL CONDITIONS FOR ACCESS ROAD IMPACTS TO SENSITIVE VEGETATION COMMUNITIES (AND MSCP)

Vegetation Community	Potential Conditions (acres)*				
	Alt. 1: Reservation Road	Alt. 2: Daisy Drive			Alt. 3: Melody Road
		Preferred Alt. – Option 1; Full Footprint	Option 2; Reduced Footprint	Option 3; Minimum Footprint	
Potential Conditions for Temporary Impacts					
Southern coast live oak riparian forest (1:1 replacement ratio)	0.06	0.02	0.03	0.06	0.14
Diegan coastal sage scrub (1:1 replacement ratio)	0.03	--	--	--	--
Non-native grassland (1:1 replacement ratio)	0.48	0.30	0.52	0.09	1.68
Subtotal	**0.57**	**0.32**	**0.55**	**0.15**	**1.82**
Potential Conditions for Permanent Impacts					
Southern coast live oak riparian forest (3:1 replacement ratio)	0.66	0.33	0.75	0.09	1.71
Diegan coastal sage scrub (2:1 replacement ratio)	0.10	0	0	0	0
Non-native grassland (1.5:1 replacement ratio)	1.43	0.65	1.23	0.11	7.02
Subtotal	**2.19**	**0.98**	**1.98**	**0.20**	**8.73**
TOTAL	**2.76**	**1.30**	**32.53**	**0.35**	**10.55**

* The impact acreages under each alternative represent both the access alternative impacts and the other intersection improvements.

Impacts to sensitive habitat types could be addressed through a combination of habitat creation, restoration, or revegetation, or acquisition of in-kind habitat as addressed by the MSCP. The Project BSAs are located within the Metropolitan-Lakeside-Jamul Segment and South County Segment as designated by the County's MSCP Subarea Plan. MSCP designated areas are regulated under the authority of the County in cooperation with CDFW and USFWS. Specific requirements for individual projects are required to be consistent with the requirements set forth in the MSCP, Subarea Plan, and BMO.

To develop areas designated as Hardline Preserve, a Minor Amendment or Major Amendment to the MSCP would be required with County approval, as well as land preservation specified by the BMO (see Table 5.14-5). Because a portion of the proposed SR-94/Jamacha Road intersection improvement area is located within two overlapping County mitigation areas, potential habitat replacement ratios identified for these areas are double that what is stated in the BMO.

- Potential impacts related to the spread of invasive plant species could be addressed through the following efforts:

  - For any erosion control techniques involving plant fibers or seed mixes, such as straw wattles or hydroseeding, the contractor would use products that are certified weed free.

Before entering or leaving the construction and mitigation sites, equipment would be inspected for evidence of invasive species or seeds. Should any plants or seeds be detected, the equipment would be washed to ensure that no invasive species are brought into or removed from the site.

Alternative 3

Sections 2.16 through 2.21 in this Final EIR identify potential conditions that could be applied by the County for improvements outside of the Caltrans ROW and within the County's jurisdiction to address Project effects that may exceed County standards related to biological resources.

In addition, the following potential conditions supplement those contained in Sections 2.16 through 2.21:

- Impacts to sensitive vegetation communities (southern coast live oak riparian forest, Diegan coastal sage scrub, and non-native grassland) could be addressed through replacement at the ratios presented in Table 5.14-6 (in conformance with the BMO).
- Impacts to raptor foraging habitat (non-native grassland) could be addressed through implementation of the condition listed above for sensitive vegetation communities.
- Potential impacts related to the spread of invasive plant species could be addressed through the following efforts:

  - For any erosion control techniques involving plant fibers or seed mixes, such as straw wattles or hydroseeding, the contractor would use products that are certified weed free.

  - Before entering or leaving the construction and mitigation sites, equipment would be inspected for evidence of invasive species or seeds. Should any plants or seeds be detected, the equipment would be washed to ensure that no invasive species are brought into or removed from the site.

5.15 ENERGY

5.15.1 Existing Conditions

Existing Setting

Refer to Section 2.15.1 in this Final EIR for a discussion of the setting relative to energy.

Regulatory Framework

General Plan Conservation and Open Space Element

The Conservation and Open Space Element contains goals and policies relevant to energy conservation. These elements provide a framework to accommodate future development within the County in an efficient and sustainable manner, and include goals and policies to encourage efficient use of water and other natural resources, efficient energy use in buildings and infrastructure, renewable energy production, and land use development patterns and transportation choices that would reduce pollutants and energy use.

Strategic Energy Plan 2013-2015

The purpose of the Strategic Energy Plan is to provide energy and sustainability objectives and goals in the following areas: energy and water conservation and efficiency, sustainable design, energy supply, distributed generation, vehicular transportation, energy and sustainability education and outreach, energy consumer choice, recycling and landfill diversion, and GHG emissions reduction.

San Diego Gas & Electric Long Term Procurement Plan

The Project is located within the San Diego Gas and Electric (SDG&E) service area. As required by the California Public Utilities Commission (CPUC), utility companies such as SDG&E must prepare a Long Term Procurement Plan (LTPP) to ensure that adequate energy supplies are available to maintain a reserve margin of 15 percent above the estimated energy demand. These plans outline any future energy needs and how those needs can be met. In December 2006, SDG&E filed its LTPP with the CPUC, which included a 10-year energy resource plan that details its expected portfolio of energy resources over the planning horizon of 2007 through 2016. The projections included in the current LTPP were based on the California Energy Commission (CEC) California Energy Demand 2008-2018 Forecast, dated November 2007. The most recent CEC Energy Demand Forecast (2014-2024), however, shows that projections are now lower than what was anticipated in 2007.

Refer also to Section 2.15.1 in this Final EIR for regulatory setting.

5.15.2 County Standards

CEQA Guidelines Appendix G does not contain specific thresholds related to energy-use. CEQA Guidelines Appendix F, Energy Conservation, provides direction as to the type of information, analysis, and mitigation that should be considered in evaluating a proposed project.

In accordance with CEQA Guidelines Appendix F, the Proposed Project would exceed applicable County standards if it would:

1. Substantially increase the consumption of electricity, natural gas, gasoline, diesel or other non-renewable energy types such that the construction of new facilities and sources of energy or major improvements to local infrastructure would be required.

2. Cause the use of large amounts of electricity and natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies.

5.15.3 Compliance with County Standards

Standards 1 and 2

Alternatives 1-3: Build Alternatives

The Proposed Project consists of improvements to existing intersections and an access road from SR-94 to the JIV Gaming Facility. Energy would be expended during the construction period of the proposed improvements. Construction activities resulting in energy use include employee transport to and from the site, use of construction machinery during site preparation and facility construction, temporary delays caused by use of traffic control measures, and the import/export of materials/equipment. As discussed in Section 2.15, the Project Alternatives would use energy during construction in the same manner; however, they would vary in degree depending on the nature of improvements. For example, construction of the facilities under Alternative 1 would expend less energy than Alternative 3 due to the increased amount of construction activities required for the Alternative 3 access road. Regardless, the short-term use of energy to improve roadway facilities would result in long-term energy savings through the resulting more efficient traffic flow within the Project area. The savings in operational energy requirements would offset the energy used for construction and would result in a net savings in energy use in the long term.

Following construction, operation of the roadway facilities would not involve long-term energy use, with the exception of the additional traffic signals at the improved intersections. The post-construction energy consumption associated with the Project Alternatives would result in energy savings in the long term similar to those noted above for construction. Specifically, the improved LOS and reduced congestion at the improved roadway facilities would decrease travel times for motorists and support less vehicle operating time, thus reducing fuel consumption.

Based on the above analyses, implementation of the Proposed Project would not exceed applicable County standards related to construction or operational energy use.

Alternatives 1, 2, and 3 would also be consistent with County standards for plans and policies relative to energy, including the following:

- General Plan Conservation and Open Space Element Goal 16, Sustainable Mobility: Transportation and mobility systems that contribute to environmental and human sustainability and minimize GHG and other air pollutant emissions.
- Strategic Energy Plan Community Goal #4: Transportation and Land Use. Reduce petroleum demand through reduced vehicle demand and vehicle miles traveled, and by encouraging deployment of alternative fuel vehicles.

As discussed above, the improved roadway facilities as a result of the Project would reduce congestion and associated vehicular emissions and fuel consumption. Additionally, the Proposed Project is located within the SDG&E planning area which is covered by the LTPP. The current LTPP plans for higher levels of demand than has actually occurred. Thus, the Project would not result in an unanticipated increase of energy demand beyond what is already anticipated and included in the LTPP, and would not exceed related County standards.

5.15.4 Potential Conditions that Could be Implemented by the County

Because Project implementation would not exceed applicable County standards as outlined in the above analysis, no conditions related to energy are identified.

CHAPTER 6.0

COMMENTS AND COORDINATION

Chapter 6 – Comments and Coordination

6.1 INTRODUCTION

Early and continuing coordination with the public and public agencies is an essential part of the environmental process, the helps planners determine the necessary scope of environmental documentation and the level of analysis required, and to identify potential impacts and avoidance, minimization, and/or mitigation measures. Agency consultation and public participation for the Proposed Project have been accomplished through a variety of formal and informal methods, including the public scoping process, Project Development Team (PDT) meetings, and interagency coordination meetings. This chapter summarizes the results of Caltrans' efforts to identify, address, and resolve project-related issues through early and continuing coordination.

6.2 PUBLIC SCOPING PROCESS

A Notice of Preparation (NOP) was mailed out to the public on August 23, 2013 to begin the CEQA public scoping process on the Proposed Project. Caltrans held a CEQA Scoping Meeting on September 25, 2013 at the Cottonwood Golf Club located at 3121 Willow Glen Drive in El Cajon, California. An English version of the public notice was issued in the *San Diego Union Tribune* on Thursday September 5, 2013, while a Spanish version was issued in the *San Diego Union Tribune Enlace* on September 7, 2013. In attendance at the Public Information Meeting were a bilingual court reporter, as well as Caltrans and consultant Spanish translators.

One-hundred and thirty seven people from the surrounding community attended the scoping meeting raising various concerns associated with the Project and JIV Gaming Development Project. Caltrans provided display boards for each proposed improvement to the intersections and access roads. Caltrans staff and support consultants were in attendance to answer questions and address concerns from area residents.

Correspondence received includes eight comment letters from public agencies/groups; 91 individual comment letters from the general public; a scoping report (including comments from 20 individuals); and one form comment letter signed by 40 individuals. The public agency/group letters received during the comment period included the following:

- County of San Diego, Dianne Jacob, Vice-Chairwoman, Second District;
- County of San Diego, Planning and Development Services;
- United States Department of the Interior, Fish and Wildlife Service;
- State of California, Department of Fish and Wildlife;

- San Diego Rural Fire Protection District;
- Valle de Oro Community Planning Group; and
- Jamul Dulzura Community Planning Group (with follow-up letter).

In all, correspondence contained a total of 496 individual comments by public agencies, groups and individuals combined. Approximately 56% of the comments were traffic-related, with requests made to study additional intersections of County roads with SR-94.

Comments and concerns raised were related to various issues including traffic, fire/emergency service, community character, biological resources, hydrology/water quality, groundwater resources, cultural resources, noise, air quality/climate change, wastewater, visual impacts/community character, agricultural resources, as well as others. A number of the issues raised were related to JIV Gaming Development Project such as wastewater comments, the risk to public safety resulting from traffic increases related to the Gaming Development Project, and potential Gaming Development Traffic impacts to wildlife along Proctor Valley Road.

Traffic concerns, which received the majority of comments, were focused on the impacts to neighboring properties, Steele Canyon High School, impacts to emergency response due to traffic stacking on SR-94, sight distance impacts, impacts to additional County roadways and intersections, and impacts associated with the redistribution of traffic related to Alternative 3: Melody Road Access Alignment. Additional traffic comments were submitted that were prepared as comments on the JIV Gaming Development Project Tribal EE. These comments addressed such items as construction traffic, emergency access, traffic accidents causing roadside fires, school buses and the need to address impacts at other SR-94 and County intersections.

Biological comments related to the need to assess impacts to the RJER, HCWA and MSCP lands were received, as well as a need to assess impacts associated with wildlife road mortality, potential loss of connectivity for wildlife conservation areas, impacts to wetlands and jurisdictional waters, impacts to sensitive species (Quino checkerspot butterfly, least Bell's vireo, and California gnatcatcher), and indirect impacts to habitat function within conservation areas. Comments were also received regarding the need to assess the impact on the riparian corridor adjacent to the proposed SR-94/Jamacha Road improvement.

Community character comments were raised with an overriding concern being the preservation of Jamul's rural character and quality of life. This concern was related more to the JIV Gaming Development Project than specific traffic improvements being proposed for the SR-94 Improvement Project. Specifically, questions were raised concerning intersections at SR-94/Cougar Canyon Road (location of Steele Canyon High School), SR-94/Otay Lakes Road, SR-94 Proctor Valley Road, as well as various County roadways such as Jamul Drive, Steele Canyon

Road, Proctor Valley Road, etc. Specific concerns were related to the JIV Gaming Development Project, rather than elements of the proposed SR-94 Improvement Project.

6.3 PROJECT DEVELOPMENT TEAM MEETINGS

Caltrans has held three Project Development Team (PDT) Meetings with a cross-section of County, State, and Federal agency personnel, as well as community members. The agencies and community groups invited to the PDT meetings included County of San Diego, CDFW, USFWS, Sempra Utilities, San Diego Fire Department, Jamul Dulzura Community Planning Group, and JIV. The first of these meetings was held early in the process on November 8, 2013, at the Caltrans District 11 offices in San Diego County, California. The second meeting was held on and January 28, 2014, while the third was held on June 5, 2014, both at the same location as the first PDT meeting. The meetings served to update the PDT members and discuss the status of the technical studies, discuss the Project timeline, and issues related to the Project. Project issues discussed included potental impacts to wildlife from increased JIV Gaming Development Traffic, the potential impact on parking spaces at the SR-94/Steele Canyon commercial establishment, clarification of details related to planned roadway improvements, discussion of existing SR-94 traffic issues, discussion of issues related to the JIV Gaming Development Project, and potenital impacts on adjacent utilities.

6.4 CONSULTATION AND COORDINATION

Caltrans staff/consultants have met with State/Federal agency personnel at the CDFW, USFWS and USACE throughout the process to discuss right-of-way and technical issues (impacts to water of the U.S., the MSCP, etc.) related to the project. Consultation/coordination has included phone, e-mail and meetings with various agencies/groups during the course of preparation of the Draft EIR. As of August 2014, this consultation has included the following:

- USACE: Field verification of the waters delineation was performed by the USACE on November 1, 2011. A meeting was held on December 12, 2013 to discuss waters of the U.S. at Melody Road. A field verification occurred on February 11, 2014 by USACE to "field verify" all boundaries of Waters of the U.S. Section 404 Nationwide Permit issued on September 29, 2015;

- USFWS: Informal consultation was initiated in 2013 with USFWS (Eric Porter, Carlsbad Fish & Wildlife Office). USFWS submitted comments on the Notice of Preparation of the Draft Environmental Impact Report for the SR-94 Improvement Project (SCH #2013081071), September 2013.

- CDFW: Informal consultation was initiated in 2013 with CDFW staff (San Diego office). CDFW submitted comments on the Notice of Preparation of the Draft Environmental Impact Report for the SR-94 Improvement Project (SCH

#2013081071), September 2013. CDFW staff did not identify any specific impacts to State-listed species or Species of Concern. However, CDFW staff did request the inclusion of certain mitigation measures, which will be adopted. Several meetings have occurred between CDFW and the Jamul Indian Village's consultants regarding CESA, California Fish and Game Code compliance, and potential impacts to CDFW lands (Ranch Jamul Ecological Reserve and Hollenbeck Canyon Wildlife Area) including: (a) November 8, 2013 at the Caltrans District 11 Office in San Diego. Sally Brown, Tim Dillingham (CDFW), and Richard Burg (CDFW) attended PDT meetings for this project. (b) November 28, 2012 at CDFW San Diego Office. Discussion of Jamul Indian Village's responses to CDFW comments on Tribal Environmental Evaluation, (c) January 10, 2013 at CDFW San Diego Office. Further discussion of project impacts and discussion of Tribal Environmental Evaluation, (d) January 14, 2014 at CDFW San Diego Office. Caltrans' staff (Jamie LeDent, Bruce April, Robert James, and Michael Galloway) met with Sally Brown (USFWS), Tim Dillingham (CDFW), and Richard Burg (CDFW) to discuss biological resource issues for this project, and (e) January 28, 2014 at the Caltrans District 11 Office on San Diego. Sally Brown, Tim Dillingham (CDFW), and Richard Burg (CDFW) attended PDT meetings for this project.

- County of San Diego: County representatives were present at the three PDT meetings held for the Project. A phone conversation with County staff April 15, 2013 regarding MSCP Major and Minor Amendment areas and process. A phone conversation with also held with County staff June 5, 2013 regarding County scenic highway program. County staff stated that there are no unified standards used County-wide to designate scenic highways, nor is there and application process to do this. The designation is simply a desire on the local planning group's part to designate a segment of highway using their own "criteria." Once listed in the Community Plan, this officially becomes part of the General Plan through the General Plan update process because the Community Plans are part of the General Plan. For compliance purposes, these areas are then overlaid with a "S" zone in the zoning books for Special Area Designations. According to County staff, this zone does not yet apply to SR94 from Melody to the JIV Tribal Lands.

- San Diego Natural History Museum (SDNHM): A record search was requested on September 4, 2013. The same day the SDHM responded by email that there were no fossil localities within the project study area or one mile radius.

- South Coastal Information Center (SCIC): Cultural resources records searches for the project were performed by SCIC located at San Diego State University on July 30, 2009, September 13, 2012, and April 15, 2013.

- Native American Heritage Commission (NAHC): The NAHC was contacted in July 2009 requesting a search of their Sacred Lands File. The reply from the NAHC in August 2009, states the search does indicate the presence of Native American sacred lands or traditional cultural resources in the immediate project area. Letters were sent in June 2010 to the 14 tribes, groups or individuals on the contact list provided by the NAHC, informing them of the Proposed Project and asking for background information relative to the project area. Follow-up telephone calls were made in June 2010. For more information regarding Native American coordination see Section 2.7 of this Final EIR.

The Project received a Nationwide Permit from the USACE on September 29, 2015. Caltrans has applied for, and are awaiting decision for the CDFW Streambed Alteration and 401 Water Quality Certification. County of San Diego Permits have not yet been applied for or issued because the CEQA process is still underway. The County of San Diego, who is serving as a Responsible Agency on the Project, will wait until the end of the CEQA process before deciding on the County Permits.

6.5 PUBLIC REVIEW PERIOD

Caltrans released the Draft EIR to the public on July 13, 2015 for a 45-day period that ended on August 27, 2015. A public hearing to allow the public an opportunity to provide input regarding the Draft EIR was held at the Cottonwood Golf Club located at 3121 Willow Glen Drive in El Cajon, California on August 5, 2015. A public meeting notice was mailed to those on the distribution list, as well as being published in the *San Diego Union Tribune*. Approximately eighty-four people signed-in and attended the public hearing.

The public hearing was staffed by Caltrans and consultant personnel in open house style format. Topical stations were located on the perimeter of the meeting room and were staffed with knowledgeable Caltrans personnel to present information and answer questions related to their area of expertise. Information display boards were lined down the middle of the room so that the viewing public could view the alternatives in the order presented in the Draft EIR. The Project consultants positioned themselves in the middle of the room near the informational boards making themselves available to answer questions from the attending public. A Spanish translator was available to assist as necessary. The attending public was encouraged to sign-in, receive project information, visit the stations/information boards, and submit written and/or oral comments to a court reporter.

Caltrans received numerous written and oral comments during the public comment period from public agencies, organizations, businesses and individuals (see tabular listing below). The comments are included in this chapter along with written responses from Caltrans. The

comments are located on the left half of the page, with each specific comment numbered on the left-hand margin and the correspondingly numbered response to each comment on the right side of the page.

State Agencies	Received Via
Department of Fish and Wildlife	Mail

Local Agencies	Received Via
San Diego County Board of Supervisors, Second District	Mail
County of San Diego, Planning and Development Services	Mail

Local Organizations, Interest Groups and Businesses	Received Via
Jamul Indian Village	Mail
Jamul Against the Casino (JAC)	Mail
Deerhorn Valley Community Association	Mail
Jamul Dulzura Community Planning Group	Mail
Webb & Carey	Mail

Citizens	Received Via
Wick Alexander	Comment Card
Julia Allen	Mail
Roberto Alvarez	Email
Anonymous	Comment Cards
Ruth Baak	Emails
Laura Baret	Comment Card
Debbie Beenau	Email
C. Beers	Comment Card
Don Beers	Comment Card
Vicki Beers	Comment Card/Email
Amber Beers-Puyer, et al	Comment Card
Mark Bende	Comment Card
Diane Bender	Comment Card
Nadine Bennett	Transcript
Dan Bilbo	Email
Karen Bobczynski	Email
Tom Bobczynski	Email
Nancy Bobo	Email
Robin Bratsford	Comment Card
Preston Brown	Comment Card/Mail
David Buller	Email/Mail
Sharona Canales	Email
Michelle R. Cardenas	Email
Rene L. Cardinale	Mail/Email
Caruso	Transcript
Michael Casinelli	Email/Mail
Helen & Stephen Comer	Email
Edward and Mary Cruz	Email
Dana	Transcript
Melanie D. Davis	Email
Stephanie Dillon	Email

Citizens cont.	Received Via cont.
Phyllis Dozier	Email
Michelle Dyke	Email
JME	Email
Cynthia Evans	Comment Card
William R. Fair	Comment Card/Transcript
Josan Feathers	Email
Laura Flores	Mail
Daniel E. Floyd	Comment Card
Daniel L. Floyd	Comment Card
S. Floyd	Comment Card
Vernon A. Fry	Mail
Laura Gant	Transcript
Kim Hamilton	Transcript/Comment Card
Angela Hanzal	Comment Card
Kip Hanzal	Comment Card
James Harmon	Mail
Michael Harrelson	Transcript
Nancy Harrelson	Email/Comment Card
John Hayes	Mail
Bill Herde	Mail
George Hetzel	Email
Robert Hill	Comment Card/Email
Chad Hines	Mail
Danielle Hines	Mail
Dennis Hines	Mail
Diane Hines	Mail
Nathan Hines	Mail
Veronica Hoban	Transcript/Mail
Franklin Hoff	Comment Card
Debbie Hopkins	Email
Jacob Huggins	Email
Linda Ivy	Email
Lauren Jackson	Email
Denise Jermyn	Email
Johnston	Email
Dean Jones	Comment Card
John Kaufman	Comment Card
Hope & David Keesling	Email
Emma King	Mail
Curtis Kopotic	Email
Jan Kopotic	Email
Carole Lembke	Mail
Rebecca Lester	Emails
Cynthia Linstad	Email
Jorge Lizarraga	Mail
Steve Manson	Mail
Richard Marzec	Transcript
Marcy May	Comment Card/Mail/Transcript
Vicki McCalmont	Comment Card
Anita McClatchey	Email

Citizens cont.	Received Via cont.
Judy McDaniel	Email
Robert A. Mendoza	Transcript
Gordon Menzie	Transcript
Janet Mulder	Comment Cards/Transcript/Mail
Rob Murphy	Email
Nancy Murrell	Comment Card
Dave Norberg	Email
Kim Norberg	Email
Lorna S. Odegaard	Email
Michelle Owens	Email
Jocelyn Parker	Email/Mail
Lew Parlette	Transcript
Linnea Peltola	Comment Card
Eileen Poole	Comment Card
Glen & Verna Poorbaugh	Email
Verna Poorbaugh	Comment Card
Mary Jane Quinn	Email
Celeste Shenas	Email/Transcript
Mike Sisson	Email/Transcript
Nancy Smith	Comment Cards
Alison W. Spurgeon	Emails
Marcia & Michael Spurgeon	Comment Card/Mail
Jean Strouf	Transcript/Mail
Patrick Sullivan	Email
Brenda Swaim	Email
Jill Tatman	Email
Carol Tatum	Transcript
Pat Terry	Comment Card
R.L. Torretto	Email
Greg Tyree	Comment Card
Kathleen D. Tyree	Emails
Kirk A. Venzor	Email
Zay Venzor	Email
Connie Via	Transcript
L.W.	Comment Card
Robyn H. Wallace	Email
Valerie Wayson	Email
Aimee Weatherred	Email
Daniel C. Wemple	Email
Deborah Wermers	Transcript
Howard M. Whitfield	Mail
Steve & Bernice Willcuts	Comment Card/Email
Jerry Williams	Email
Danielle Wilson	Email
Mitch Wilson	Email
Carrie L. Witte	Comment Card
Dana Yenawine	Mail

COMMENTS

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

August 27, 2015

Mr. David Nagy
Chief, Environmental Analysis, Branch B
Caltrans, District 11
4050 Taylor Street, MS-242
San Diego, CA 92110
david.l.nagy@dot.ca.gov

Subject: Comments on the Draft Environmental Impact Report for the State Route 94 Improvement Project (SCH# 2013081071)

Dear Mr. Nagy:

The Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the State Route (SR-) 94 Improvement Project (Project) dated July 2015. The Department has identified potential effects of this project on wildlife and sensitive habitats. The comments provided herein are based on the information provided in the DEIR, a site visit on June 30, 2015, and our knowledge of sensitive and declining habitats. The Department would like to thank Caltrans staff for their willingness to work with us to improve this project.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (§§ 15386 and 15281, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code Section 1600 et seq. The Department also administers the Natural Community Conservation Planning program. Several portions of the proposed project are within the County of San Diego's (County) Multiple Species Conservation Program (MSCP) Subarea Plan. In addition, the Department is the owner of two properties proximate to the proposed project, Rancho Jamul Ecological Reserve (RJER) and Hollenbeck Canyon Wildlife Area (HCWA).

The proposed project consists of five non-access road intersection improvements. In addition, the DEIR evaluates three access road alternatives, and a no project alternative. The non-access road alternatives are the same under each access road alternative, but each access road has several options. The five stand-alone/non-access road intersections all intersect the SR-94 at the following road crossings: Jamacha Boulevard; Jamacha Road; Steele Canyon Road, Lyons Valley Road, and Maxfield Road. The three access alternatives with options include: Melody Road access alignment, Daisy Lane access alignment, and Reservation Road access alignment. The Melody Road alignment involves the construction of a new road from Melody Road into the Jamul Indian Village (JIV) Tribal Lands and impacts the MSCP hardline preserve area, an action that would require a boundary line adjustment to the preserve in order to construct. The Daisy Lane alignment has a direct connection to SR-94 and has three possible build options. The Reservation Road alignment utilizes the existing access road into the JIV Tribal Lands.

A1

All alternatives will require Right of Way (ROW) acquisition of Department land. For your reference and to encourage transparency, the Department attaches our most recent letter to JIV

Conserving California's Wildlife Since 1870

RESPONSES

A1 Thank you for your comment. The Final EIR acknowledges that ROW would be required for the alternatives analyzed (see Final EIR Section 1.4 Project Alternatives, Table 2.3.2, 2.3.3, 2.3.4, and 2.3.5). The issue of the Wildlife corridors was addressed in Section 2.16.2 of the Final EIR. With regards to safety, the proposed intersection and roadway segment improvements would meet Caltrans Highway Design Manual standards that have been established by the Caltrans to maintain the safety of traveling along State Route facilities for all users. The comment will be forwarded to the JIV for their consideration.

COMMENTS

Mr. David Nagy
Caltrans, District 11
August 27, 2015
Page 2 of 3

A1 cont.

encouraging it to focus on the wildlife corridor and human safety enhancements the Department requested in April 2015 as the minimum necessary for the Department to consider transfer of the Right of Ways along SR 94.

The Department acknowledges that Caltrans has added design features and mitigation measures to the project to try to avoid or reduce potential environmental impacts. Sensitive biological resources in the vicinity of the project are associated with the native terrestrial and aquatic habitats of the area. Sensitive species located within or directly adjacent to the project limits that may be adversely affected include CESA-listed and Endangered Species Act (ESA)-listed plant and animal species. Among the species that may be affected are; least Bell's vireo (*Vireo bellii* ssp. *pusillus*), coastal California gnatcatcher (*Polioptila californica californica*), and Otay tarplant (*Deinandra conjugens*). In addition, a rare plant, Palmer's goldenbush (*Ericameria palmeri* var. *palmeri*) is also present within the project limits.

The Department provides the following specific comments and recommendations to assist the California Department of Transportation in avoiding or minimizing potential impacts to sensitive native plants, wildlife, and vegetation communities identified in the DEIR:

A2

1. Page 1-23. Bioswales/Drainage Improvements. The Department concurs with the plan to upsize culverts to improve drainage as it may also improve wildlife crossing of the roadway. The bottomless culvert proposed for Melody Road is also our preferred design for this type of crossing, and the Department further recommends that the culvert design should include a bank or bench on at least one side above normal water level (bank full condition) through the culvert, i.e. out of the low flow channel, to improve the crossing function for small animals.

A3

2. Page 2.6-24. The Department agrees with the proposed use of native species for landscaping and that the plants and trees will be of local genotype.

A4

3. Page 2.16-11. The description under Alternative 2; Option 3 Minimum Footprint should be revised as it does not include the additional ROW needed from Department lands as listed on Page 1-36, Table 1-8, that includes Department owned parcels, APNs 597-080-700 and 597-080-800.

A5

4. Page 2.18-3. Special Status Plant Species. Non-access Road Intersections. Recent Department site visits detected Palmer's goldenbush, a CRPR 1B.1 plant species, within the proposed impact area at the SR-94/Jamacha Road intersection. The Department recommends that the impacts to Palmer's goldenbush at this location be mitigated using the same proposal for the impacts that may occur from the Melody Road Access alignment, if selected as the access alternative.

A6

5. Page 2.19-5. Roadkill. The Department recommends increasing the number of wildlife crossings and enlarging existing culverts that may provide opportunities for wildlife to safely cross roadways, especially within designated MSCP core areas and wildlife corridors. The Department appreciates the proposed upsizing of culverts within the project area and the potential improvement of the Willow Creek culvert to enhance wildlife movement. We further recommend that ledges be included in culverts to provide small animals with dry crossings during wet weather or other conditions that fill crossings with water.

RESPONSES

A2 Caltrans appreciates CDFW concurrence on the plan to upsize culverts and improve drainage. The design suggestion of CDFW will be incorporated into Chapter 1.0 Project Description. The bottomless culvert would be designed to include a bank or bench on at least one side to improve the crossing function for small animals. The addition of this minor project detail, which has been included in the Section 1.4.3 Preferred Alternative Discussion, does not change any of the impacts as analyzed in the Final EIR. The impact to animal species remains less-than-significant without this project feature.

A3 Caltrans appreciates CDFW agreement with Caltrans' plan to use native species for landscaping and the use of local genotype for plants and trees.

A4 Though not identified as the Preferred Alternative, the following text was inadvertently omitted from the description for impacts under Alternative 2; Option 3 (Section 2.16.3):

> The additional ROW needed on CDFW preserve lands (0.08 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 0.24 acres of new preserve lands.

This language has been added to Section 2.16.3 Natural Communities. Please note that acknowledgement of land conveyance was noted in the Easements and ROW Acquisition discussion of Chapter 1.0 Proposed Project for Alternative 2: Option 3 (see Final EIR Section 1.4.3).

A5 The mitigation measure suggested by CDFW has been incorporated (see Final EIR Section 2.18.4). If Palmer's goldenbush is impacted at the SR-94 / Jamacha Rd intersection, the impacts will be mitigated using the same mitigation measure as proposed for the Melody Road Access alignment, which is summarized as follows. Using a 3:1 mitigation ratio, preserve lands would be acquired via an in-lieu fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as on the 87-acre parcel). All stands of Palmer's goldenbush would be transplanted to this preserve area prior to the start of construction. The relocated goldenbush would be monitored and maintained for 3 years to ensure successful re-establishment and to control invasive weeds.

COMMENTS

Mr. David Nagy
Caltrans, District 11
August 27, 2015
Page 3 of 3

A7 6. The Department recognizes the need for safety along the highway corridor for our employees who work on our adjacent properties and the public who visits them. In furtherance of that need the Department will continue to participate in discussions with the JIV Tribe on the ROW needs for the project, including the establishment of wildlife crossings on SR-94.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact Mr. Tim Dillingham at tim.dillingham@wildlife.ca.gov or (858) 467-4250.

Sincerely,

for Theresa A Stewart
Edmund Pert
Regional Manager
South Coast Region

Attachment

ec: Tracie Nelson, CDFW, Tracie.Nelson@wildlife.ca.gov
Rich Burg, CDFW, Rich.Burg@wildlife.ca.gov
Terri Stewart, CDFW, Terri.Stewart@wildlife.ca.gov
Wendy Bogdan, CDFW, Wendy.Bogdan@wildlife.ca.gov
Sally Brown, U.S. Fish and Wildlife Service, Sally_Brown@fws.gov
Bruce April, Caltrans, bruce.april@dot.ca.gov

RESPONSES

A6 The issue of Roadkill and Wildlife Corridors is presented in Section 2.19.3 of the Final EIR. As disclosed in the Final EIR, no special-status wildlife species were reported to be killed within the Project limits by wildlife-vehicle collisions in the California Road-Kill Observation System database, agency reports, or the CNDDB. Retaining walls to be installed as part of the project are seen as beneficial because the walls would deter animals from entering busy roadways, and encourage wildlife to stay in the stream corridors or cross underneath existing culverts and bridges. Enlargement of pipe culverts under SR-94, and replacement of the concrete pipe culvert under Melody Road with a bridge that has a bottomless culvert design would also be provided as part of the access alternatives. Lastly, none of the alternatives generate any additional traffic volume on SR-94 (see Final EIR Section 2.4), so construction of Alternatives 1-3: Build Alternatives would not significantly increase the current mortality rate of wildlife-vehicle collisions on SR-94. However, implementation of Alternative 3: Melody Road Access Alignment, which requires a new road through a hardline preserve area, could generate a new source of roadkill. This, as stated in the Final EIR, is a significant impact for the Alternative 3: Melody Road Access Alignment (see Final EIR Section 2.19.3). Design considerations focused on improving existing crossings and culverts. The Proposed Project, as designed, increases to the most practical extent the number of wildlife crossings and culvert enlargements. The bottomless culvert at the Melody Road intersection would also be fitted with a ledge to allow small animal movement. Therefore, the Proposed Project (except for Alternative 3) would not increase roadkill.

A7 Caltrans appreciates CDFW's willingness to continue discussions with the JIV on ROW needs for the Project.

COMMENTS

DIANNE JACOB

SUPERVISOR, SECOND DISTRICT
SAN DIEGO COUNTY BOARD OF SUPERVISORS

Serving the cities of:
El Cajon
La Mesa
Lemon Grove
Poway
Santee

Serving the communities of:
Agua Caliente
Allied Gardens
Alpine
Barrett
Blossom Valley
Bostonia
Boulevard
Campo
Canebrake
Casa de Oro
Crest
Cuyamaca
Dehesa
Del Cerro
Descanso
Dulzura
Eucalyptus Hills
Forebrook
Flinn Springs
Granite Hills
Grantville
Guatay
Harbison Canyon
Jacumba
Jamul
Julian
Lake Morena
Lakeside
Mount Helix
Mount Laguna
Pine Hills
Pine Valley
Potrero
Ramona
Rancho San Diego
Rolando
San Carlos
San Pasqual
Santa Ysabel
Shelter Valley
Spring Valley
Tecate
Tierra del Sol
Valleciitos

Serving the Indian reservations of:
Barona
Campo
Cosmit
Ewiiaapaayp
Inaja
Jamul
La Posta
Manzanita
Santa Ysabel
Sycuan
Viejas

August 27, 2015

David Nagy, Environmental Branch Chief
California Department of Transportation, District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

Dear Mr. Nagy:

As a member of the San Diego County Board of Supervisors representing the Second District which includes the rural community of Jamul, I submit the following comments on the Caltrans Draft Environmental Impact Report (DEIR) on the SR-94 improvement project related to the proposed casino by the Jamul Indian Village (JIV).

B1 I share the concerns of the Jamul-Dulzura Community Planning group and the County of San Diego's concerns that the DEIR inadequately addresses traffic and traffic related impacts associated with the proposed 203,000 square foot casino.

B2 The most unmitigable impact continues to be the addition of over 9,000 daily vehicle trips this project would generate on State Route 94, a two-lane rural highway that is currently performing at level of service (LOS) F. The Caltrans DEIR fails to adequately mitigate the danger posed by this enormous increase in vehicle trips, creating a significant public safety issue which jeopardizes the lives of all those who travel this stretch of SR-94.

B3 Furthermore, ingress and egress to and from the casino site remains a large concern. The DEIR implies that the preferred access to the proposed casino is directly off of SR-94, which would just increase the danger for anyone driving on this already failing highway. Caltrans has repeatedly stated in writing that Melody Road is the preferred access point to this site.

B4 There are also concerns about traffic impacts on numerous County roads that would be used to access SR 94 in order to get to the casino. County roads from the east, west and south would be severely impacted by thousands of drivers, many of whom are unfamiliar with the windy, rural two-lane roads in and out of Jamul. Quiet neighborhoods also would be disrupted by the additional traffic on these roads.

B5 The impacts on County roads listed in the county's comment letter have not been addressed, nor has any mitigation been mentioned in the DEIR. CEQA requires that all impacts associated with this proposed development must be fully mitigated, not just direct impacts on SR-94. Therefore, all County facilities that would be impacted by the enormous increase in daily traffic trips must be identified in the DEIR and fully mitigated prior to allowing access to the proposed development.

1600 PACIFIC HIGHWAY, ROOM 335 • SAN DIEGO, CALIFORNIA 92101-2470
(619) 531-5522 • FAX: (619) 696-7253 • TOLL FREE: 800-652-7322
250 E. MAIN STREET, SUITE 169 • EL CAJON, CALIFORNIA 92020-3941
www.diannejacob.com

RESPONSES

B1 The gaming facility currently being constructed by the JIV is not the project being evaluated by the Final EIR because CEQA does not apply to the gaming facility and Caltrans has no authority over its construction or operation. The gaming facility is being constructed by JIV (a sovereign tribe) in accordance with the Tribal-State Gaming Compact and State Indian gaming laws. Caltrans is not responsible for evaluating the environmental impacts of the gaming facility and is not responsible for mitigating any environmental impacts associated with the JIV gaming facility. In fact, the gaming facility could open for business in advance of construction and operation of the SR-94 Improvements (see Final EIR Appendix J (August 27, 2013 Letter of Jacob A. Applesmith)). Caltrans notes that JIV has already undertaken and completed environmental review for the separate gaming facility project in accordance with the Tribal-State Gaming Compact and State laws (see http://www.jamulindianvillage. com/relevant-documents/).

The construction and operation of traffic improvement measures (collectively, the "SR-94 Improvements") that will improve traffic flow and safety along a specific stretch of SR-94 are the Proposed Project evaluated in the Final EIR (see Final EIR Section S.1, S.4, 1.1). The Caltrans Final EIR evaluates the traffic impacts associated with the construction and operation of these SR-94 Improvements (see Final EIR Section 2.4.3). For example, the Final EIR finds that there will be certain construction period traffic delays associated with, among other things, the installation of traffic signals at certain intersections and the widening and re-striping of certain portions of SR-94 (see Final EIR Section 2.4.3). The Final EIR provides mitigation measures for these construction impacts, such as a comprehensive traffic management plan, that avoid or reduce any significant impacts to less–than-significant levels (see Final EIR Section 2.4.4)

B2 Please see RTC B1.

COMMENTS	RESPONSES
	B3 The Final EIR evaluated each alternative at an equal level of detail and did not imply that the preferred access was directly off SR-94. The Final EIR did, however, identify Alternative 2: Daisy Drive; Option 3 Minimum Footprint as the Environmentally Superior Alternative (see Final EIR Section S.5). Following completion of the Final EIR, and review of public comments submitted during scoping and the Final EIR period, Caltrans has now identified Alternative 2: Daisy Drive Access; Option 1 Full Footprint as its the Preferred Alternative (see http://www.dot.ca.gov/dist11/news/2015/172.html). The access road improvements presented in the Final EIR for Alternative 2: Option 1 would be constructed in conformity with all applicable safety and engineering standards as set forth in the latest Caltrans Highway Design Manual. Furthermore, Alternative 2: Option 1 would not require any Caltrans design exceptions; the facility would be constructed to be completely consistent with Caltrans' design standards. Additionally, the traffic study presented in the Final EIR shows that the SR-94/Daisy Drive intersection would operate below capacity with an acceptable LOS during the Near Term and Horizon Year scenarios under Alternative 2: Option 1, which includes the assumption of JIV gaming traffic.
	B4 Please see RTC B1. Caltrans has no authority over the construction and operation of the approved JIV gaming facility as that activity is being undertaken by a federally recognized Indian Tribe on its sovereign lands. The Project that is evaluated in the Caltrans Final EIR and that is being considered for approval by Caltrans is a series of traffic improvement measures the purpose of which is to mitigate traffic impacts associated with the approved JIV gaming facility, provide appropriate access to and from SR-94 and the approved JIV gaming facility, improve the geometric design of the main access between SR-94 and the approved JIV gaming facility and improve the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road.
	B5 Please see RTC B1 and B4.

COMMENTS

B6 In the event of closure of SR94 because of a collision or fire, what is the evacuation plan? If a collision or fire should occur east of this site and SR94 is severely congested because of casino traffic, what is the plan to make sure residents and the traveling public are safe? These questions are not adequately addressed in the DEIR and for the public's safety it is imperative that they are addressed. Please see the "death trap" shown in attachment "A" which illustrates my point.

B7 State Route 94 is a major arterial route for many communities in the rural backcountry including an international corridor serving Tecate, Mexico. It also serves as the only way into and out of the community of Jamul in the case of emergencies. The lack of adequate mitigation as described in the DEIR places the lives of those who live in these communities at risk.

B8 In conclusion, the DEIR is incomplete and therefore not in compliance with CEQA. I look forward to reviewing your response that addresses the points raised in this letter and all correspondence from the County, the Jamul Dulzura Community Planning Group, and those in the affected communities.

Sincerely,

DIANNE JACOB
Supervisor, Second District

Cc: Joe Stuyvesant, JDCPG, w/ attachment

RESPONSES

B6 The gaming facility currently being constructed by the JIV is not the Project being evaluated by the Final EIR because CEQA does not apply to the gaming facility and Caltrans has no authority over its construction or operation. Please see RTC B1. The Project considered in the Final EIR is the package of roadway improvements referred to as the SR-94 Improvements and the SR-94 Improvements will result in improved LOS operation for the project corridor, thereby improving emergency response times once the SR-94 Improvements become operational (see Final EIR Sections 2.4.3 and 2.5.2).

The Final EIR evaluates the temporary impact of construction of the SR-94 Improvements on emergency services (see Final EIR Section 2.5.2). Mitigation measures are proposed to avoid or minimize effects on emergency service responses times when such services are responding to a collision or fire incident (see Final EIR Sections 2.4.4 and 2.5.3).

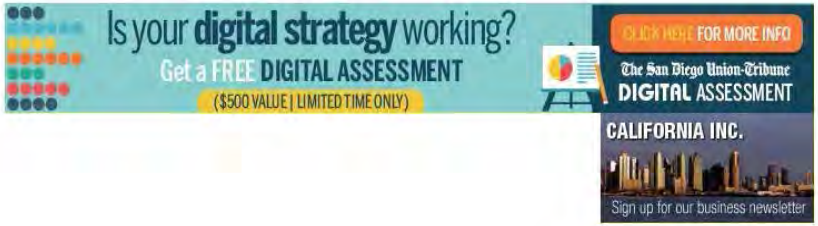
B7 Please see RTC B1 and B6. The fact that SR-94 is used by emergency vehicles to respond to a traffic incident in the Jamul area pertains regardless of the SR-94 Improvement Project and regardless of the approved JIV gaming facility. In accordance with CEQA, the Final EIR considers the temporary impact the SR-94 Improvements have on traffic circulation and emergencies services (see Final EIR Section 2.4.3 and 2.5.2). Mitigation measures are proposed to avoid or minimize the temporary adverse effect on traffic and emergency services (see Final EIR Sections 2.4.4 and 2.5.3). Furthermore, the long-term operation of the SR-94 Improvement Project will improve traffic flow along SR-94 in the Project area, thereby improving emergency vehicle response times (see Final EIR Section 2.5.2).

B8 Thank you for your comment. The Final EIR has been prepared in accordance with, and complies with, CEQA.

COMMENTS	RESPONSES
Attachment "A" – The "DEATH TRAP" 	

COMMENTS	RESPONSES

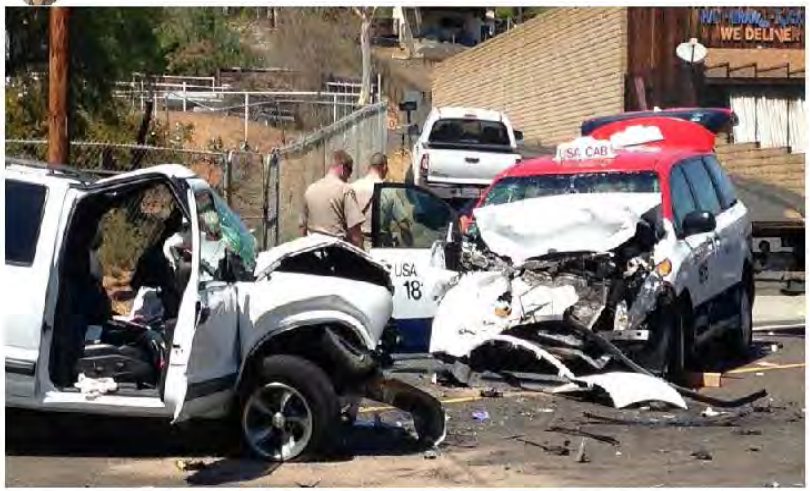
Search



LOCAL TOPICS | CRIME, COURTS & FIRE

1 dead, 3 injured in SR-94 collision in Jamul

By Pauline Repard | 1:41 p.m. Aug. 27, 2015 | Updated, 2:53 p.m.



The SUV driver died and three people were injured in a collision with the USA cab van on SR-94 at Marlena Way in Jamul — *John Gibbins*

EAST COUNTY — The 75-year-old driver of an SUV died in a head-on collision with a wheelchair transport van on state Route 94 in Jamul Thursday, authorities

COMMENTS	RESPONSES

said.

Three people in the USA Cab transport van suffered minor injuries and were taken to a hospital by ambulance.

The name of the Chevrolet Blazer SUV driver, a Jamul man, was not released. The California Highway Patrol said he may have suffered a medical condition before the crash.

The head-on collision occurred about 12:50 p.m. Thursday near Marlena Way, near Rancho Feed and Pet Supply and west of Steele Canyon Road.

A witness, Matt Goodman, 25, of Jamul, said he was about 300 feet ahead of the Blazer, going east, as he drove through the intersection. When he glanced at his rear-view mirror, he saw the SUV and van in the middle of the road with major front-end damage.

"I backed up and got out to see if everyone was OK," Goodman said. He checked first on the SUV driver. "I felt for a pulse. No pulse," Goodman said. "Then I went to the taxi van. Everyone seemed OK. No one was unconscious. They weren't trapped, they were just in shock."

One of the three inside was a woman who had been in a wheelchair in the back of the van, but was thrown to the floor by the impact, Goodman said.

The Blazer driver veered out of his eastbound lane, crossed the 12-foot center turn lane and continued into the westbound lane into the path of the taxi van, CHP Officer Kevin Pearlstein said. He said it wasn't clear why the Blazer went into the opposite lane, as there was no driveway on that side of the road to enter.

"He may have suffered a heart attack," Pearlstein said. "We won't know until an autopsy."

He said the 45-year-old male taxi driver and two passengers, both women, had minor injuries.

Traffic was closed in both directions for a time, but parents trying to pick up students at nearby Steele Canyon High School were escorted through.

COMMENTS

County of San Diego

MARK WARDLAW
DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

DARREN GRETLER
ASSISTANT DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

August 27, 2015

David Nagy, Environmental Branch Chief
California Department of Transportation, District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

Via E-mail: SR-94_SR_94_DRAFT_EIR@dot.ca.gov

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORTEIR FOR STATE ROUTE 94 IMPROVEMENT PROJECT

The County of San Diego (County) appreciates the opportunity to comment on the State Route 94 (SR-94) Improvement Project Draft Environmental Impact Report (DEIR). The County has also attached the letter that we received on August 26, 2015 from the Jamul-Dulzura Community Planning Group. The County requests that Caltrans evaluate the Planning Group's comments and respond appropriately. The County acknowledges that "Caltrans is the Lead Agency for California Environmental Quality Act (CEQA) for the proposed Project". However, Chapter 5 introduces the County as a Responsible Agency for portions of the Project under CEQA as defined in CEQA Guidelines Section 15381:

> *"Responsible Agency" means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project.*

The County as a Responsible Agency has serious concerns about the adequacy of the DEIR to fully mitigate traffic impacts that will result from the Jamul Indian Village Gaming Development (JIVGD) for all road users of SR-94 and other County maintained roads in the unincorporated Jamul/Dulzura community.

C1 The Final Tribal Environmental Evaluation (EE) proposed mitigation measures, which required the financing and implementation of various road improvements. The DEIR indicates (footnote #4, Page 1-4) that *"intersections other than those listed within this DEIR were identified as being significantly impacted by JIVGD project traffic in the Final Tribal EE prepared for the JIVGD Project (2013)"*. This DEIR conclusion is not consistent with the County's position, as direct impacts to County facilities were identified in the Final Tribal EE traffic study of the full

RESPONSES

C1 As stated in Section 1.1 of the Final EIR, the JIV gaming facility currently under construction is not the Proposed Project. The gaming facility is currently under construction in the absence of the SR-94 Improvements and can open for business in the absence of the SR-94 Improvements. Please see RTC B1. Thus, consideration of the SR-94 Improvements in the Final EIR does not in any way "facilitate the JIV Gaming Development traffic impacts" on County roadways, intersections or SR-94 itself because that traffic to and from the gaming facility will utilize area roadways and intersections regardless.

The Proposed Project (the SR-94 Improvements) that is evaluated in the Final EIR is a series of features identified through the separate environmental review process (culminating in preparation and certification of the JIV Final TEE) conducted by JIV for the gaming facility in accordance with State Indian gaming laws and the Compact between the State and JIV. Please see RTC B1. These features constitute the SR-94 Improvements. Their purpose is to improve area traffic conditions compared to what would otherwise exist (see Final EIR Section 1.2.1).

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

C1 cont.

facility. Caltrans, by conducting an evaluation of the SR-94 improvements will facilitate the JIVGD traffic impacts which therefore must be evaluated in the CEQA document. The DEIR does not include analysis of JIVGD impacts to County facilities, and does not propose mitigations. Subsequently, all of the identified JIVGD traffic impacts should be addressed in the Final Environmental Impact Report (EIR). See section later in the letter highlighting specific improvements that need to be studied for impacts and mitigation.

C2

Fire and Life Services Impacts
All signalized intersections shall be equipped with emergency traffic control-activating strobe light sensors. The local Fire Authority having jurisdiction shall not incur any costs for the procurement, installation and maintenance of the sensors.

C3

There are multiple options proposed for the primary access to the facility. Regardless of which option is ultimately selected, the encroachment of Reservation Road to Campo Road (SR-94) should be improved to safely and efficiently allow access for fire aerial apparatus. The County is also concerned that additional traffic that will be attracted by these improvements will increase wildfire risk, which should be evaluated in the DEIR. The County is also concerned that the increased traffic that is allowed and encouraged by these improvements will increase congestion and make it more difficult for SR-94 to be used as an evacuation route. The DEIR should evaluate and develop emergency evacuation plans.

C4

C5

Transportation
The DEIR identifies in numerous locations that the JIVGD is scheduled to open in spring of 2016, however improvements to the following intersections are expected to commence in early 2016 and be completed by summer 2016:

- SR-94/Jamacha Boulevard Intersection
- SR-94/Jamacha Road Intersection
- SR-94/Steele Canyon Road Intersection
- SR-94/Lyons Valley Road Intersection
- SR-94/Maxfield Road Intersection

C6

The temporal gap between the opening of the JIVGD and the completion of the SR-94 intersection improvements is a concern to the County. For the JIVGD to ensure its *"good faith effort to implement the SR-94 intersection improvements, pursuant to the terms of the Tribal-State Gaming Compact"*, the JIVGD should postpone opening until the intersection improvements are completed to the satisfaction of Caltrans. Furthermore, the DEIR discusses that the construction schedule for all of the access options will be 15 months. The agreement between Caltrans and the Jamul Indian Village on April 7, 2009 includes a requirement for JIVGD to complete, *"Improvements intended to mitigate the impacts from project construction shall be implemented prior to project construction activities and the improvements intended to mitigate impacts from Project operation shall be implemented prior to the opening and operation of the Project"*. The timing of the intersection improvement mitigation measures, the associated impacts to the community if the improvements are not constructed prior to the gaming facility opening and compliance with the agreement between the Tribe and Caltrans

RESPONSES

C2 The signalized intersections would be equipped with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors), as noted. They would be either installed or modified to incorporate these sensors if they are not currently present (see Final EIR Section 1.4.1, 1.4.2, 1.4.3, and 1.4.4). This would occur at the following intersections:

- SR-94/Jamacha Boulevard intersection (equipment is there already)
- SR-94/Jamacha Road (equipment is there already)
- SR-94/Steele Canyon Road (equipment is there already – but may require upgrade)
- SR-94/Lyons Valley Road (new equipment to be installed)
- SR-94/Melody Road (new equipment to be installed)
- SR-94/Daisy Drive (new equipment to be installed).

Costs do not comprise a CEQA issue and are outside the purview of this document. Nonetheless, Caltrans assumes responsibility for procurement, installation and maintenance of all lighting fixtures on state highways.

C3 Thank you for your comment. The comment passed on the JIV for consideration. Reservation Road would be improved to accommodate aerial fire apparatus if that is the primary access route ultimately chosen for implementation.

C4 The improvements proposed in Chapter 1.0 of the SR-94 Improvement Project Final EIR would not result in the increase of traffic along SR-94. Section 2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities (see Final EIR page 2.4-12) states that the Proposed Project "…does not actually generate operational traffic…" Please see RTC B1 and C1.

C5 The intersection and roadway segment improvements evaluated with the Final EIR would not induce additional traffic along SR-94 as the improvements would not provide additional network changes to the circulation network within the study area. The improvements on their own would not generate additional traffic volumes along SR-94 or the connecting street network within the study area. Please see RTC B1 and RTC C1.

COMMENTS	RESPONSES
	C5 cont In accordance with CEQA, the Caltrans Final EIR considers the impact the SR-94 Improvements have on traffic circulation and emergencies services (see Final EIR Section 2.4.3 and 2.5.2). Mitigation measures are proposed to avoid or minimize adverse effect on traffic and emergency services (saee Final EIR Sections 2.4.4 and 2.5.3). In the unfortunate event of a road closure along SR-94, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions as to how to safely manage the street network. These events occur randomly and under different circumstances. Each situation is handled differently using the judgment of trained traffic control officers. When an emergency occurs, vehicular traffic is required to move to the shoulder and allow emergency vehicles to pass.
	C6 The commenter refers to the Tribal-State Gaming Compact between the JIV and State of California in claiming that a failure to postpone opening of the casino until the intersection improvements are completed would not be a "good faith effort" to implement the SR-94 intersection improvements. The Tribal-State Compact is an agreement between the Tribe and State of California, and is not an element of the SR-94 Improvement Project Final EIR. Please see Final EIR Appendix J (August 27, 2013 Letter of Jacob A. Applesmith).

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

needs to be clarified in the response to comments and in the Final EIR. Any work within the County right-of-way (ROW)/Roads will require an encroachment permit.

C7 The DEIR states that there are improvements in the Regional Transportation Plan for SR-94 to Steele Canyon Road and Melody Road. However, the projects are expected to occur in the final phase of the plan and improvements will only be to four lanes to Steele Canyon Road in the revenue constrained scenario (Page 1-4).

C8 The DEIR only contains references to Jamul/Dulzura and Valle De Oro Community and Subregional Plans. The DEIR should also reference the County's General Plan Mobility Element (ME).

C9
- Alternative #3 conflicts and is inconsistent with County's General Plan ME Policies and Policies in the Jamul/Dulzura Community Plan.
- Alternative #3 (Melody Road) does not conform with the County's General Plan ME classification for Melody Road.
- Alternative #3 proposes a four lane cross-section between the Casino entrance and SR-94 vs. ME classification of 2.2E Light Collector.
- The DEIR (Page 2.1-28) describes this as inconsistent with the County's General Plan and Jamul/Dulzura Community Plan.

C10
- Proposed designs on County roadways (i.e. Melody Road) should be provided to the County Department of Public Works (DPW) Transportation Division for review and approval.

C11
- Key Views 2 and 5 (Figures 2.6-1-18) simulations show metal beam guardrail (MBGR) along Melody Road. The proposed installation of MBGR should be reviewed to determine if MBGR criteria are met along Melody Road. Based on the exhibits provided, the MBGR appears to be located within a tangent section of roadway where run-off the road collisions are less likely to occur. Also, the embankment adjacent to the roadway does not appear to be substantial and may not meet slope criteria as identified in the Caltrans Traffic Manual, Section 7.

C12
- The DEIR should list the recommended roadway/intersection improvements that mitigate the proposed project's impacts.

C13
- Each of the Access Alignment alternatives (Figures 1-9 through 1-13) show removal of left-turn access for vehicles entering and exiting various roadways/driveways, including but not limited to the following as a result of the SR-94 Improvement Project:
  - Las Palmas Drive,
  - Various private driveways along SR-94, and
  - A private driveway on north side of Melody Road (west of proposed Casino Entrance in Melody Road Access Alignment alternative).
  - A different striping plan should be proposed that would accommodate turns from driveways. If left turns cannot be accommodated, the Final EIR should include an assessment for out-of-direction travel for each of the impacted roadways/driveways.

C14
- Figure 1-8 identifies additional ROW required along the northern boundary of SR-94, which is project frontage of a current discretionary project under review by the County.

RESPONSES

C7 The Final EIR accurately reflects how the improvements along SR-94 are listed and presented in the SANDAG 2050 Regional Transportation Plan (RTP). The improvements along SR-94 at the intersection of Steele Canyon Road included in the Final EIR, which include the widening from a 2-lane conventional highway to a 4-lane conventional highway at the intersection, are consistent with Table A.2 in the RTP, which states that SR-94 would be widened to a 4-lane conventional highway between Jamacha Road and Steele Canyon Road by the Year 2050. The roadway widening included in the Final EIR would be implemented prior to the overall roadway widening, but would be consistent in terms of the overall classification of the roadway.

Other intersection and roadway improvements included in the Final EIR do not include the conversion of SR-94 from a 2-lane conventional highway to a 4-lane conventional highway. All other improvements would add additional turning lanes to key intersections.

C8 The County General Plan Mobility Element was cited on pages 2.1-12 and 2.1-26 of the Final EIR.

C9 Findings were made for Melody Road pursuant to the Jamul/Dulzura Community Plan in the Final EIR (see Final EIR Section 2.1.2.1). Those findings are also included in this Final EIR (as modified per RTC C37).

Bullet 2: The current classification in the General Plan ME for Melody Road has two travel lanes, with no median. This is consistent with the existing roadway. Under No Build conditions, the intersection of Melody Road and SR-94 would operate at LOS E and F at horizon year (year 2025). The addition of Project traffic under this alternative would additionally overload this intersection during peak hours, as well as the turn from Melody Road to the JIV gaming facility (see below).

Bullet 3: Project improvements were proposed to address projected peak hour conditions. As described in Section 2.4 and Chapter 5 of the Final EIR, turn-lanes would be installed to accommodate traffic turning onto/from Melody Road from/toward the JIV gaming facility, and onto/from Melody Road from/toward SR-94. Due to the short distance between the casino turn-off of Melody Road and turns onto/off of SR-94, there would not be adequate space to taper dual lanes back to the existing roadway classification, and therefore, additional lanes would need to be constructed between the casino entrance and

COMMENTS	RESPONSES
	C9 cont SR-94. The new classification is specified on Table 5.3-3 in the Final EIR. Bullet 4: These potential conflicts were disclosed in the Final EIR (pages 2.1-28 and 29), and were identified as being less-than-significant under CEQA.
	C10 Any designed improvements on County Roads would be provided to the County of San Diego Department of Public Works (DPW) Transportation Division for review and approval following Caltrans selection of a Preferred Alternative and project approval.
	C11 Per the Key View #2 the conceptual grading design per each Alternative uses 2:1 slopes located at the edge of roadway shoulder to minimize the encroachment of slope grading upon adjacent properties. The omission of the MBGR may be realized based on the selected Alternative that will have a specific slope grading and maximum limit of encroachment.
	C12 The DEIR did not identify any significant impacts on roadways/ intersections. Thus, no mitigation is required. To the extent that the commenter is referring to the JIV gaming facility as the Project, please see RTC B-1.
	C13 Within the footprint of each of the Access Alternative improvements shown in Figures 1-9 through 1-13, there are no private driveways or private streets that currently have designated left-turn pockets in or out of the existing properties along SR-94 or Melody Road. None of the proposed access alternatives propose to eliminate left-turn movement in or out of existing properties. Out of direction traffic, is not anticipated as the result of the improvements and thus, additional analysis of out-of-direction travel is not needed as part of this Final EIR.
	C14 Thank you for your comment.

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

Pedestrian, Transit and Bicycle

C15 The DEIR analyzes alternatives that provide improved automotive access to the JIV Tribal Lands. The DEIR does not account for non-motorized improvements that would be necessary to accommodate workers (or patrons) that would access JIV Tribal Lands via pedestrian/transit or bicycle modes.

C16 Page 5-7 identifies that *the "proposed project would not comply with the County's General Plan objectives supporting alternative forms of transportation to reduce demand on the road system"*, this statement comes after Section 2.4-1 that directs Caltrans, as assigned by the Federal Highway Administration (FHWA), that *"safe accommodation of pedestrians and bicyclists during the development of roadway projects"*.

C17 9,000 additional trips from the JIVGD will significantly increase pedestrian and vehicular interaction. Therefore, the DEIR cannot state that the project has less than significant impacts with the build alternatives on the pedestrian, transit and bike lanes category.

C18 The County's General Plan, Bicycle Transportation Plan and Community Trails Master Plan identify specific improvements that the DEIR should include as project features to support alternative transportation and provide safe accommodation of pedestrians and bicyclist. This would include a full network of walking provisions and eight foot shoulders along the state highway.

Specific Recommended Improvements – Bicycle and Pedestrian Facilities

C19
- The proposed project should make improvements to pedestrian facilities along SR-94 near Steele Canyon High School to improve the safety of students walking to school.

C20
- The proposed project does not include any improvements to the bridge between Steele Canyon Road and Jacumba Boulevard. The County is concerned that this will create a bottleneck that should be mitigated and the DEIR only studies the intersections.

C21
- The DEIR (Page 2.4-11) incorrectly identifies the County's Bicycle Transportation Plan recommendations for SR-94.
  - SR-94 south of Proctor Valley Road has a Bike Lane – Class II Classification.
  - The proposed project should consider inclusion of the appropriate Bikeway classification.

C22
- Page 2-4-67 when bike lanes are closed for construction consider use of *Bikes May Use Full Lane*, rather than *Share the Road* Signs.

C23
- Transit stops (Page 1-22) states that *"pedestrians would have access along the road shoulder or along a dirt path"*. The County has Road Standards and a Community Trails Master Plan that identifies a SR-94 pathway within the project area. The project should propose to build this pathway outside of the travel way to accommodate transit users who may visit or work in the JIV Tribal Land.

C24
- SR-94 at Steele Canyon Road intersection - provide bike lanes/shoulder. Also provide ADA compliant pedestrian walkways to connect curb ramps to the nearest transit stop and intersection.

RESPONSES

C15 The Proposed Project features are designed to meet the stated objectives of SR-94 reducing traffic impacts associated with the operation of the JIV gaming facility. In accordance with CEQA, the Final EIR evaluates a reasonable range of alternatives aimed at achieving these Proposed Project objectives (see Final EIR Section 1.4). Please see RTC B1 and RTC C1 (see Final EIR Sections 2.4.3 and 2.4.4).

C16 The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulleting (DIB) 82-05, with includes "Pedestrian Accessibility Guidelines for Highway Projects".

C17 The commenter expresses concerns about traffic impacts from the JIV gaming facility, which is not the Proposed Project. Please see RTC B-1.

C18 The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulletin (DIB) 82-05, with includes "Pedestrian Accessibility Guidelines for Highway Projects".

Within the footprint of the improvements included in the Final EIR, standard 8-foot shoulders would be provided

C19 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1). Chapter 2.4 of the Final EIR did not identify any Project related impacts along SR-94 at or near Steele Canyon High School. No mitigation is required.

COMMENTS	RESPONSES
	C20 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1).The Proposed Project, as described in Chapter 1.0 of the SR-94 Improvement Project, is designed to improve traffic operations at select intersections and an access road along SR-94. As detailed in Section 2.4 *Traffic and Transportation/ Pedestrian and Bicycle Facilities*, traffic operations along the corridor would be improved from existing/baseline conditions with the implementation of the Proposed Project. The Proposed Project would not create a "bottleneck" that requires mitigation. Adding the proposed second eastbound right-turn lane at the intersection of SR-94/Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards. The commenter is most likely referring to increased traffic resulting from the operation of the JIV gaming facility. Please see RTC B1 and RTC C1.
	C21 Page 2.4-11 of the FEIR was modified to include the correct classification per the County of San Diego Bicycle Transportation Plan. Campo Road (SR-94) is classified as a Class III bicycle facility between Steele Canyon Road and Proctor Valley Road, and as a Share-the-Road signage corridor south of Proctor Valley Road.
	C22 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1).Chapter 6 of the 2014 California Manual on Uniform Traffic Control Devices allows for the use of either the Share the Road signs or the Bicycle May Use Full Lane signs in situations where shoulders need to be closed for temporary construction periods. The Final EIR was revised to provide flexibility for the use of either sign. The final sign determination would be made during the preparation of the Final Transportation Management Plan for the improvements.

COMMENTS	RESPONSES
	C23 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1).The intersections and roadway segment improvements evaluated in the Final EIR would be designed and constructed in a manner consistent with the Design Information Bulletin (DIB) 82-05, which include "Pedestrian Accessibility Guidelines for Highway Projects". As part of the coordination with the San Diego Metropolitan Transit System, improvements to the existing bus stops at these intersections would be included as part of the intersection improvements, including a pedestrian pathway from the corner of the intersection to the improved transit stop and pedestrian connectivity. The County of San Diego's Community Trails and Pathways Planidentifies SR-94 as a Proposed Community Pathway. The document defines a Pathway as a multi-use trail within a parkway or public road right-of-way that serves as local circulation, recreation, and connection to other trail systems. Consistent with Caltrans standards, the improvements included in the Final EIR would include right of way that provides for the necessary room for the implementation of the County's trail connection in the future.
	C24 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1).The intersection improvements at SR-94/Steele Canyon Road would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. In addition, these improvements would be designed and constructed in a manner consistent with the Design Information Bulletin (DIB) 82-05, with include "Pedestrian Accessibility Guidelines for Highway Projects". As part of the coordination with the San Diego Metropolitan Transit System, improvements to the existing bus stops at this intersection would be included as part of the intersection improvements, including a pedestrian pathway from the corner of the intersection to the improved transit stop.

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

C25
- SR-94 at Lyons Valley Road intersection - provide bike lane/shoulder. Also provide ADA compliant pedestrian walkways to connect curb ramps to the nearest transit stop and intersection.

C26
- SR-94/Maxfield Road intersection - provide bike lane/shoulder. Also provide ADA compliant pedestrian walkways to connect curb ramps to the nearest transit stop and intersection.

Specific Recommended Improvements – Roadway Facilities

C27

Segment / Intersection	Impact
Steele Canyon Road (Willow Glen Drive to Jamul Drive)	Direct Impact from additional traffic needs to be fully mitigated.
Steele Canyon Road (SR-94 to Willow Glen Drive)	Direct Impact from additional traffic needs to be fully mitigated.
Jamul Drive (Lyons Valley Road to Steele Canon Road)	Direct Impact from additional traffic needs to be fully mitigated.
Willow Glen Drive to SR-54	Direct Impact from additional traffic needs to be fully mitigated.
SR-94 / Vista Sage Road	Intersection Impacted, no turnout area.
SR-94 / Vista Diego Road	Intersection Impacted, no turnout area.
SR-94 / Honey Springs & Otay Lakes Road	Intersection not improved, off-set intersection with impact from project. Eastbound to Northbound sight visibility constrained.
Honey Springs/Skyline Truck Trail and Lyons Valley Road '4 corners'	Intersection and Sight Distance.
Lyons Valley Road and Japatul Valley Road	Intersection and Sight Distance.
Lawson Valley Road and Skyline Truck Trail	Intersection and Sight Distance.
Peg Leg Mine Road and Lyons Valley Road	Intersection and Sight Distance.
Rocky Sage Road and Lyons Valley Road	Intersection and Sight Distance.
Pleasant View Lane and Lyons Valley Road	Intersection and Sight Distance.
Hidden Trail and Skyline Truck Trail	Intersection and Sight Distance.
Babel Drive and Skyline Truck Trail	Intersection and Sight Distance.
Melody Road and Proctor Valley Road	Intersection and Sight Distance.
Calle Mesquite/ Calle Bueno Ganar/ Proctor Valley Road	Intersection and Sight Distance.
Lyons Valley Road and Skyline Truck Trail	Intersection and Sight Distance.
Jamul Drive and Lyons Valley Road	Intersection and Sight Distance.

C28

Biology
The DEIR improvement alternatives selected have impacts to Biology. Options 2 and 3, Daisy Drive and Melody Road have impacts to the County's Multiple Species Conservation Program (MSCP), sub-area plan. The County would be required to issue permits and take discretionary actions if either of those two alternatives are selected, as the land use authority over the

RESPONSES

C25 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1).The intersection improvements at SR-94/Lyons Valley Road would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulletin (DIB) 82-05, with includes "Pedestrian Accessibility Guidelines for Highway Projects". As part of the coordination with the San Diego Metropolitan Sytem, it was determined that, as there are not existing transit stops at this intersection, a pathway between transit stops and the corner of the intersection was not needed.

C26 The comment requests modifications outside the stated Project Objectives (see Final EIR Section 1.2.1).The intersection improvements at SR-94/Maxfield Road would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of Caltrans Highway Design Manual. In addition, these improvements would be designed and constructed in a manner consistent with the Design Information Bulletin (DIB) 82-05, with includes "Pedestrian Accessibility Guidelines for Highway Projects". As part of the coordination with the San Diego Metropolitan Transit System, improvements to the existing bus stops at this intersection would be included as part of the intersection improvements, including a pedestrian pathway from the corner of the intersection to the improved transit stop.

C27 Please see RTC C20. The Proposed Project will not increase traffic volumes or change the geometrics of the listed intersection. For that reason, the listed intersections where not included in Final EIR evaluation. The commenter is most likely referring to increased traffic resulting from the operation of the JIV Gaming Development Project. Please see RTC B1 and C1.

C28 The County has confirmed that access road impacts to lands on the 87-acre parcel designated "Hardline preserve" would require an amendment to the MSCP, such as a boundary-line adjustment or a Minor Amendment.

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

unincorporated lands these improvements would be located on. The County is interested in the following clarifications and makes comments to ensure impacts are fully studied.

C29
- Mitigation for these two alternatives, if done appropriately should not result in either of the other alternatives being selected as Caltrans weighs the life safety risks. The County has had preliminary conversations with the wildlife agencies and an amendment to the MSCP is something that can be considered if Melody Road is the preferred alternative.

C30
- Page 2.16-2 - The information on this page approximates the various percentages of the various types of vegetation communities; however, the percentages add up to 109.6%. While qualified as approximations, it does not make sense to have over 100% of a project area classified. These percentages need to be clarified and corrected.

C31
- Page 2.16-10 - Regarding the compensatory mitigation to address impacts to natural communities, please clarify for mitigation #1 the duration of the proposed deed restriction or if the restriction would endure in perpetuity. Further, clarify what agency determines the qualification of lands to be deed restricted and what criteria will be used to determine qualification.

C32
Mitigation associated with the various alternatives is required because of the development of variable acres (depending on the alternative) of designated MSCP lands that result in the need to amend the "Hardline" boundary of the MSCP by the County. Amendment of a conservation boundary to enable development is not mitigation, it is facilitation of development. Please explain how amendment of this boundary constitutes mitigation and also provide the analysis of potential impacts that might result from the boundary adjustment, consistent with all of the alternatives, to aid the justification for such a discretionary action by the County.

Given that the boundary adjustment is a future discretionary action by the County, the County must have the information pertaining to the potential impacts caused by boundary adjustments and the identification of mitigation, if necessary, in order to process such an amendment. As currently described, the proposed mitigations associated with the various alternatives disclose differing acreages of land to be preserved, but nowhere is the amendment to the MSCP Hardline analyzed. It is merely identified as a necessary action to enable project implementation.

C33
Mitigation measures identified for habitat restoration via vegetation restoration needs to be clarified. As currently described, the performance standard is for vegetation to be actively maintained for three years to ensure establishment and control invasive weeds. The mitigation measure performance standard needs to be clarified such that plant establishment and preclusion of invasive weed establishment are successful over the long term, not just within a three year window. Three years is arbitrary and does not ensure vegetation establishment. The mitigation measure must allow for the enforcement of the condition that the vegetation community is established thereby allowing for enduring mitigation, not temporal mitigation for three years. While there may not be the need for active maintenance beyond a three year timeframe, if there is a need to take action in future years, this mitigation measure, as currently drafted, will not enable Caltrans to require the applicant to address any deficiencies in vegetation establishment after three years.

RESPONSES

C29 Caltrans selected Alternative 2: Daisy Drive Option 1 Full Footprint as the Preferred Alternative (See Final EIR Section 1.6). The specific criteria chosen were:

- Traffic Operations
- Roadway Geometrics
- Right-of-Way Impacts
- Environmental Impacts
- Constructability

The criteria chosen were based on the performance requirements or desired attributes of the project with respect to the Purpose and Need and the specific project objectives to:

- Provide appropriate access to and from SR-94 and the approved JIV Gaming Development,
- Lessen direct traffic impacts caused by the JIV gaming facility on SR-94,
- Improve the geometric design of the main access between SR-94 and the gaming facility, and
- Improve the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road in a manner consistent with the SR-94 Transportation Concept Summary (TCS) and the 2050 Regional Transportation Plan (RTP).

C30 On Page 2.16-2, there was a typographic error in the reporting of the percentages of vegetation communities. As published, 93% was classified as urbanized/developed vegetation communities, but in fact, 83% can be classified as urbanized/developed vegetation communities. As corrected, the percentages total to 100%.

C31 Impacts to natural communities would be mitigated according to guidelines established by the MSCP, CDFW, and USFWS. Land dedicated for preservation would be deed-restricted in perpetuity with conservation easements. Private lands used for land preservation requirements would meet the criteria used by CDFW and USFWS to establish similar mitigation banks in San Diego County (such as the Crestridge Conservation Bank).

COMMENTS	RESPONSES
	C32 As disclosed in the Final EIR, construction of the access alternatives would result in the use of land with a MSCP land designation of "Hardline Preserve" as a roadway. Taking this land for roadway use would need to be accomplished via a MSCP boundary line adjustment as also disclosed in the Final EIR. See Final EIR Section 2.16, 2.18. The boundary line adjustment is listed as a required approval for this access option. See Final EIR at S.6. The Final EIR extensively documents the physical biological effects that would result from such MSCP boundary line adjustment. See Final EIR at 2.16.1, 2.16.2, 2.16.3, 2.17.4, 2.18.4, 2.19.3, 2.19.4, 2.20. In Sections 2.16-2.21, the Final EIR details how those effects are to be avoided or reduced through mitigation prescribed by the MSCP. the Final EIR explains that the MSCP requires the dedication of new compensation land of equal or greater biological value to mitigate the impact associated with taking preserve land out of the MSCP via boundary line adjustment, and that the MSCP requires land to be dedicated as compensation land in specified ratios. For example, if one acre of grassland is impacted within MSCP Take Authorized areas, the compensation ratio (specified in the Biological Mitigation Ordinance) is 1:1 and the land preservation requirement would be one acre. If, for example, this one acre of grassland had a preserve designation, such as Hardline Preserve, then the compensation ratio would double (2:1) and the land preservation requirement would be two acres. The Final EIR then properly adopts the dedication of new compensation land in the ratio provided in the MSCP as the mitigation measure that would be employed depending on which access alternative is selected. See Final EIR at 2.16.1, 2.16.2, 2.16.3, 2.17.4, 2.18.4, 2.19.3, 2.19.4, 2.20.4. The Final EIR documents the fact that approval of the dedication would be made by the County of San Diego. See Final EIR at S.6. Finally, it should be noted also that the preserve land offered as compensation is located on the 87-acre parcel, which consists of pristine coastal sage scrub habitat (ranked at the highest quality—Tier 1), while the preserve land proposed to be developed is either annual grassland habitat or ruderal/disturbed habitat (both ranked at the lowest quality—Tier 3). Finally, as to the criticism that a boundary line adjustment would facilitate development, the MSCP is a program designed specifically for land development, the goal of which is to streamline the permitting process and locate development in appropriate places and consolidate land preservation requirements into large preserves that have greater ecological functions than smaller, disbursed preserves.

COMMENTS	RESPONSES
	C33 Vegetation restoration implementation and monitoring would conform to the County Land Use and Environment Group's guidelines for revegetation plans. This would expand the monitoring period from 3 to 5 years, ensuring that the monitoring period is not perceived as arbitrary, as suggested by the comment. Conforming to the County's revegetation guidelines would also ensure that native plant establishment and invasive species control activities are successful.

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

C34 Quino Checkerspot Butterfly mitigation #1 is insufficient as currently drafted. The mitigation correctly requires pre-construction, protocol surveys; the mitigation fails to define the performance standard to which the project must meet if the surveys return positive results for the presence of Quino Checkerspot Butterfly. Consultation with a federal agency does not constitute mitigation, nor does undefined potential actions that may be required should the surveys return positive presence results.

Likewise, proposed mitigation performance standard for the Hermes Copper Butterfly is equally undefined but does contain the clause that if the Hermes Copper Butterfly were found to be present that "construction would be delayed"; however, it is unclear how delayed construction would mitigate the impact: delayed until when or what happens? The delay needs to have a performance standard so that it is clear at what time that construction could commence or recommence. Consistent with the Quino Checkerspot mitigation, consultation with a federal agency does not constitute mitigation, nor does undefined potential actions that may be required should the surveys return positive presence results.

Land Use Consistency

C35 The County disagrees that the Melody Road access alignment would be inconsistent with the adopted Jamul/Dulzura Regional Plan. The plan policies request to limit access onto Major Arterial or Collector streets, but this interpretation by Caltrans does not take into account that the Melody Road access alternative would limit direct access onto a higher priority and designated corridor, SR-94. SR-94 is the largest Arterial roadway in the community, and rather, this policy would support the Melody Road access alignment if it is chosen by Caltrans as the preferred alternative.

Climate Change

C36 Increased idle time, if the proposed project and mitigation measures increases level of service on the SR-94 or within County facilities, will have an impact on greenhouse gas (GHG) emissions for the project. Page 2.13-6 – source citation for figure 2.13-2 is a broken internet link. The determination of the proposed projecting not resulting in GHG emission impacts is partially predicated on the information contained in the graphic which cannot be verified as accurate given the source of the information is unverifiable due to the broken link. Note that the information is also not cited in the source references.

C37 Further, Figure 2.13-2 would appear to contradict the narrative that precedes it which states that CO2 emissions form mobile sources are highest at speeds below 25 miles per hour (mph) and above 55 mph. Figure 2.13-2 indicates that emissions are equal or less than mobile sources traveling between 25-75 mph, rather than 25-55 mph. Additionally, there is no information presented which ties the proposed project improvements to modeled, projected or field verified speeds that will result from the improvements that support the determination of no impact.

C38 Page 2.13-7 – The frequency and occurrence of construction related emissions are purported to be reduced *"through innovations in plans and specifications and by implementing better traffic management during construction phases"*. However, there is no information which

RESPONSES

C34 The mitigation for Alternative 3: Melody Road Access requires pre-construction, protocol surveys for State-listed and federally-listed species, and specifically, for Quino checkerspot butterfly and for Hermes copper butterfly. If the surveys return positive results, no construction will occur in the affected areas. The appropriate wildlife agency (CDFW or USFWS) will be consulted, and mitigation measures will be identified before any ground disturbance occurs. CDFW and USFWS typically require full documentation and quantification of the discovered biological resource, the immediate implementation of avoidance measures, and the identification and securing of impact minimization measures and compensatory mitigation before the applicant is allowed to proceed or is issued a take permit. These mitigation measures typically consist of relocation of animals or transplantation of plants, as well as the preservation of lands containing suitable habitat (or in lieu payments to a mitigation bank) at compensation ratios of at least 1:1. Biological monitoring during groundbreaking and clearing is also typically required. Since both the California Endangered Species Act and the federal Endangered Species Act protect listed species, and since pre-construction protocol surveys will be performed, any potential future impacts to listed species will be fully mitigated.

C35 The Regional Plan does not contain language allowing for connection to a Collector Street if it precludes the connection to a higher level Arterial as suggested by the County. However, Caltrans appreciates this clarification that the Melody Road access alignment would not be considered inconsistent by the County relative to policies limiting access onto Major Arterial or Collector streets and that the County would support this alternative if it is ultimately identified as the preferred alternative. Because the identified land use inconsistencies did not rise to a level of CEQA significance in the Final EIR, this clarification does not change CEQA significance findings for land use.

COMMENTS	RESPONSES
	C36 As discussed in the Final EIR, a Project objective is to lessen direct traffic impacts on SR-94, which is achieved by reducing congestion at Project intersections. As shown in Table 2.11-2 of the Final EIR, while there would be a slight increase in delays at the SR-94/Jamacha Boulevard intersection, the Project would decrease delays at many more intersections. Without the Project, delays would increase at more intersections affecting a greater number of vehicles, which would potentially result in an increase in GHG emission for the region compared to existing GHG levels. Thus, the Project would not increase GHG emissions but would reduce them due to an overall reduction in intersection delay an improvement in the level of service. The source for Figure 2.13-2, can be found at *http://www.trb.org/main/blurbs/ 163778.aspx*. As the source of the figure is given with the figure, it is unnecessary to duplicate the source information in the reference section.
	C37 Figure 2.13-2 does not contradict the preceding paragraph in the EIR. Taking into account both the real world activity and steady-state activity, the Figure supports the statement that "The highest levels of CO2 from mobile sources such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour."
	C38 The Final EIR text reads “These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases.” Thus, the analysis does not indicate or assume that “the innovations in plans and specifications” would reduce GHG emissions by a specific amount; it merely mentions that the GHG emissions’ “frequency and occurrence can be reduced” through these innovations. As an innovation is defined as “a new method, idea, product, etc.” the innovation could not be described as they would be new, thus not necessarily in existence at the time the analysis was prepared, such as new equipment. Thus, these emissions reductions cannot be calculated and are qualitatively discussed.

COMMENTS

Mr. David Nagy
August 27, 2015
Caltrans

explains how or what about the management plans can or would be improved that result in reduced emissions.

C39 The analysis further asserts that *"...GHG emissions produced during construction can be mitigated to some degree by longer intervals between maintenance and rehabilitation events"* (emphasis added). This degree of mitigation is not explained quantitatively or qualitatively nor is the level of construction emissions ever disclosed. This project has not been characterized as maintenance or rehabilitation; it is unclear how extended intervals of maintenance and rehabilitation are related to the implementation of the proposed project. Therefore, it is unclear how a determination of no impact to GHG emissions is concluded because the levels of GHG emissions are not disclosed, the degree of mitigation is not explained and potential mitigation relates to maintenance projects not level-of-service capital improvement projects.

C40 Page 2.13-9, Table 2.13-1 – It is unclear how half of the reduction strategies contained in the table are effective because there are not baseline emission estimates (2010) nor projected estimates (2020). These *"activities (are) undertaken by Caltrans statewide to reduce greenhouse gas emissions resulting from agency operations"*. How are these statewide strategies of agency operations applicable to this proposed project? Which of the strategies are employed by District 11 that would be anticipated to reduce CO2 emissions for this specific proposed project? Since many of these strategies have unquantified emission reductions, how do they support the determination that the proposed project will have no impact on GHG emissions and climate change?

C41 Page 2.13-10 – three "measures" are listed that will reduce GHG emissions. While these measures are not characterized as mitigation measures, they nonetheless are claimed to reduce emissions but are not specifically related to operation or construction emissions. Measure 1 purports the Intelligent Transportation Systems (ITS) will help manage efficiency but it is unclear if the ITS is in place, is under development or how the efficiency addresses the emission of the proposed project.

C42 **Access Alternatives**
The County has concerns about the Daisy Drive Option 3 access alternatives and its documented need for design exceptions, as well as the reduced footprint alternatives for Option 2. Any proposed design exception that Caltrans considers for the SR-94 improvements must be approved only if Caltrans can clearly demonstrate and make findings that the proposed improvements are infeasible. Currently, it is the County's opinion that the DEIR shows that Melody Road or Daisy Drive, full footprint, are feasible even while factoring in biological and other impacts of that alternative. As the County evaluated the DEIR and the impacts from the proposed improvements to SR-94, the County recommends the Melody Road alignment be chosen as the preferred alternative.

The County appreciates the opportunity to participate in the environmental review process for the SR-94 Improvement project. We look forward to providing additional assistance at your request. If you have any questions regarding these comments, please contact Eric Lardy, Planning Manager at (858) 694- 3052 or via email at eric.lardy@sdcounty.ca.gov.

RESPONSES

C39 The analysis states that "Construction GHG emissions include emissions produced as a result of material processing, emissions produced by onsite construction equipment, and emissions arising from traffic delays due to construction. These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases. In addition, with innovations such as longer pavement lives, improved traffic management plans, and changes in materials, the GHG emissions produced during construction can be mitigated to some degree by longer intervals between maintenance and rehabilitation events." As stated, the GHG emissions considered are produced by "material processing, emissions produced by onsite construction equipment, and emissions arising from traffic delays due to construction." Thus, by improving the materials used, the process of creating the materials can result in GHG reductions from the material, as well as quantity of the equipment required to place it. Reducing traffic delays during construction would reduce GHG emissions from vehicles. Additionally, any reduction in maintenance would reduce emissions by not requiring vehicles to operate to repair the road. As these would be difficult to quantify, they are qualitatively discussed in the analysis as allowed under Section 15064.4 of the CEQA Guidelines.

C40 Caltrans is a state agency and, as such, the entire State transportation system falls under its jurisdiction. As GHG emissions and the effects of climate change are not limited to the area surrounding the Project, Caltrans is concerned with the effect of all of its actions and the total reductions across the state rather than within any single county or a particular project. The GHG reduction strategies focus on achieving reductions from many projects. This is summarized in this statement from the analysis, "The California Transportation Plan (CTP) is a statewide, long-range transportation plan to meet our future mobility needs and reduce GHG emissions. The CTP defines performance-based goals, policies, and strategies to achieve our collective vision for California's future, statewide, integrated, multimodal transportation system." Thus, from the state level perspective, it is not necessary to achieve the reductions from any single project but rather from the whole.

COMMENTS

August 27, 2015
David Nagy
Caltrans

Sincerely,

DARREN GRETLER
Assistant Director
Planning & Development Services

e-mail cc:
Conor McGee, CAO Staff Officer, LUEG
Bob Spanbauer, Policy Advisor, Board of Supervisors, District 2
Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Jeff Kashak, Environmental Planner, Department of Public Works
Richard Chin, Associate Transportation Specialist, Department of Public Works
Nick Ortiz, Land Development Project Manager, Planning & Development Services

RESPONSES

C41 Under Section 15064.4 of the CEQA Guidelines, a lead agency, such as Caltrans, has the discretion to decide for each project whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and/or rely on a qualitative analysis or performance based standards. Thus, it is not necessary or required to quantify all emissions or all emission reductions. However, Caltrans does provide State wide quantification in the CTP and other climate reduction plans as cited in the Final EIR. As for the Intelligent Transportation System, as stated in measure 1, "Caltrans and the California Highway Patrol are working with the County" on its implementation, thus it is being implemented in part with the commenting agency. Also, please reference the SANDAG Regional Plan (San Diego Forward) and the Intelligent Transportation System Strategic Plan developed by SANDAG with assistance of Caltrans, the County, all the cities within San Diego County, as well and the Metropolitan Transit System and the North County Transit District.

C42 Upon review of the Final EIR and consideration of all comments submitted during the EIR process, Caltrans has selected Alternative 2: Daisy Drive Alternative Option 1 Full Footprint as the Preferred Alternatives. This Alternative does not include Caltrans Design Exceptions.

COMMENTS	RESPONSES

August 27, 2015

VIA EMAIL AND OVERNIGHT COURIER

Mr. David Nagy
Environmental Branch Chief
California Department of Transportation, District 11
4050 Taylor Street, MS 242
San Diego, California 92110

Re: State Route 94 Improvement Project - Comments on Draft EIR (State Clearinghouse # 2013081071)

Dear Mr. Nagy:

I am writing on behalf of the Jamul Indian Village ("JIV") with respect to the Draft Environmental Report ("DEIR") recently circulated by Caltrans for its SR-94 Improvement Project (the "Project") pursuant to the requirements of the California Environmental Quality Act ("CEQA"). As you know, the Project has been proposed (and would be funded) by JIV in order to improve various intersections along SR-94 and provide improved access to its Tribal lands in unincorporated San Diego County, California. The JIV commends Caltrans on its preparation of a thorough and conservative environmental analysis, and respectfully provides the following comments on various specific aspects of the DEIR and the history of the Project.

Project Components

The Project consists of three separate build alternatives (the "Build Alternatives") designed to lessen traffic impacts that would result from the development of the JIV's approved gaming facility (the "JIV Gaming Development Project"), which is currently under construction on the JIV Tribal lands. Each Build Alternative includes the same proposed improvements to five existing stand-alone intersections. In addition, each of the Build Alternatives includes a different access road alignment and associated improvements (the "Access Road Alignments") by which traffic would travel to and from either SR-94 or Melody Road and the JIV Tribal lands. The Access Road Alignments are as follows:

(1) Via the existing "Reservation Road," which connects the JIV Tribal Lands to SR-94. The intersection of SR-94 and Reservation Road would be reconfigured to meet current Caltrans design standards, which would result in increased right of way needs.

EMAIL info@jamulindianvillage.com
TEL 619.669.4785
FAX 619.669.4817
P. O. Box 612
Jamul, CA 91935
jamulindianvillage.com

COMMENTS	RESPONSES

(2) Via "Daisy Drive," which is located on the adjacent four-acre parcel north of the JIV Tribal Lands. Under this Access Road Alignment, there are three build options analyzed – Option 1 (Full Footprint), Option 2 (Reduced Footprint), and Option 3 (Minimum Footprint). While each option uses the same Daisy Drive access point to and from SR-94, the designed Access Road Alignment improvements along SR-94 vary from option to option under this Alternative, in that each disturbs differing areas, and has different environmental impacts and right of way requirements. Under this Access Alternative, the existing Reservation Road would be fitted with removable bollards and used only for emergency purposes.

(3) Via a new roadway constructed from Melody Road south to the JIV Tribal lands. This alternative includes improvements to SR-94, the SR-94/Melody Road intersection, and a new access drive from Melody Road (west of the intersection) to the Tribal lands. This Alternative would require the development of a new access road across an 87-acre parcel to the north of the Reservation, which is neither owned nor controlled by the JIV.

The DEIR also examines a "No Project Alternative," which would not entail any construction activities. However, the consequences of implementing this alternative would be that the direct traffic impacts of the JIV Gaming Development Project would not be mitigated, and the existing Reservation Road would serve as the access point to and from the JIV Tribal lands, leading to unacceptable levels of service and traffic flow operations along SR-94.

Relationship of Project to JIV Gaming Development Project

D1 As noted in the DEIR, the JIV Gaming Development Project is a completely separate project that was approved by the JIV in 2013, is currently under construction, and is expected to be completed and opened in 2016. As background, in 1999, the Tribe entered into a Compact with the State of California (the "Compact"), which authorizes the Tribe to establish a tribally-owned gaming facility on its Tribal lands (the "Reservation") in San Diego County. (*See* Exhibit A.[1]) The Compact specifically and clearly establishes the rules by which the Tribe may construct and operate any gaming facility on its Reservation. By 2003, the JIV had formulated a proposed development project that was far larger than the current JIV Gaming Development Project, encompassing all of the 87-acre property north of the Reservation (this is the parcel over which the new access road would be constructed in the "Melody Road" Alternative evaluated in the DEIR).[2] (*See*

[1] While the JIV wishes to have all of the exhibits to this letter included within the administrative record for the Project, we leave to Caltrans's judgment whether to include all of the exhibits within the Final EIR. The JIV has no objection to the exhibits being included in the record but not in the EIR.

[2] Detractors have sometimes quoted and taken out of context certain statements by Caltrans regarding gaming facility access and a prior preference for the "Melody Road" access alignment. However, those statements were made about the 2003 "preferred version" of the development project, which was far larger and situated on different land than the current JIV Development Project. Caltrans's statements also did not take into account

D1 Thank you for your comment.

COMMENTS	RESPONSES
Mr. David Nagy Caltrans District 11 August 27, 2015 Page 3 Exhibit B for an overview of the 2003 version of the development project.) Since 2003, the JIV has substantially reduced the size of the JIV Gaming Development Project, eliminated many of the land uses previously contemplated and relocated the project buildings entirely to the Reservation. D2 As required by the Compact, in 2011, the Tribe adopted a Tribal Gaming Project Environmental Review Ordinance consistent with CEQA and National Environmental Policy Act ("NEPA") principles for purposes of evaluating the physical impacts of its proposed gaming facility. (*See* Exhibit C.) Pursuant to that Tribal Gaming Project Environmental Review Ordinance, the Tribe then undertook its own environmental evaluation of the physical on-site and off-site effects of the facility. This environmental analysis resulted in the preparation and certification of a Final Tribal Environmental Evaluation ("FTEE").[3] Prior to certification of the FTEE,[4] the Tribe circulated the draft version of this document to the public at large for review and comment and held public meetings on the environmental consequences of the gaming facility, as well as the mitigation measures and alternatives aimed at reducing significant environmental effects of the facility. The Tribe diligently responded to comments, including those submitted by JAC and its members, and made substantial modifications to the design of the facility at the request of members of the public (e.g., abandoning a high-rise parking garage in favor of an underground parking garage at significant cost to reduce the visible profile of the facility). At the end of this process in 2013, the Tribe certified the FTEE, adopted a Mitigation Monitoring and Reporting Program ("MMRP")[5] to enforce the mitigation measures therein, and approved the gaming facility.[6] D3 The Project consists solely of the improvements that the Final Tribal EE determined would be required to mitigate the off-Reservation traffic impacts of the JIV Gaming Project. Pursuant to the terms of the JIV Tribal-State Gaming Compact and the JIV's Tribal Gaming Project Environmental Review Ordinance, the JIV must make good faith efforts to implement these mitigation measures. In other words, the Project consists of the good faith mitigation measures set forth in the Final Tribal EE – the road certain local County policies indicating a preference for new access roads to connect directly with primary roads such as SR-94 (as opposed to secondary roads such as Melody Road). [3] The environmental analysis was undertaken in the form of an Environmental Evaluation rather than an EIR because CEQA does not apply to the Tribe's approval of the gaming facility. *See* Gov. Code § 12012.25(g) ("In deference to tribal sovereignty, neither the execution of a tribal-state gaming compact nor the on-Reservation impacts of compliance with the terms of a tribal-state gaming compact [*i.e.*, construction and operation of a gaming facility] shall be deemed to constitute a project for purposes of [CEQA]"). [4] A copy of the FTEE (including appendices), as well as all of the applicable addenda thereto, can be found at the following web page: http://www.jamulindianvillage.com/relevant-documents/. We ask that the FTEE and addenda thereto be included in the record of proceedings for the Project. [5] A copy of the MMRP (as amended) can be found at the following web page: http://www.jamulindianvillage.com/wp-content/documents/JIV%20MMRP%20-August%202013.pdf. We ask that the MMRP also be included in the record of proceedings for the Project. [6] Copies of the resolution certifying the Final Tribal EE and the resolutions adopting the addenda to the Final Tribal EE may be found at the following web page: http://www.jamulindianvillage.com/relevant-documents/. We ask that these resolutions also be included in the record of proceedings for the Project. A copy of Tribal Resolution No. 2013-04, modifying mitigation measures and adopting an amended MMRP, is attached hereto as Exhibit D.	D2 Please see RTC D1. D3 Please see RTC D1.

COMMENTS	RESPONSES

improvements are not components of the JIV Gaming Development Project or conditions of the construction or operation of the JIV Gaming Development Project.

D4 Notwithstanding the fact that the Project and the JIV Gaming Development Project are subject to completely separate environmental review processes, however, the CEQA process for the Project is likely to come under attack from certain opponents that for decades have been battling the JIV in its quest to achieve self-sufficiency through development of a gaming facility. These opponents include a small, but well-funded, community opposition group referred to as the "Jamulians Against the Casino" ("JAC"), as well as San Diego County. The opposition has filed over twenty (20) lawsuits against the federal government's Bureau of Indian Affairs (the "BIA"), the National Indian Gaming Commission (the "NIGC"), the JIV, the JIV's officials, the JIV's development partners, and California state agencies. However, despite the opposition's numerous efforts in multiple venues to halt construction and operation of the JIV Gaming Development Project, the courts have consistently found that the JIV's sovereign status and preemptive federal and state laws have barred those challenges. (*See* the Litigation Matrix provided as Exhibit E, as well as pertinent decisions and briefs provided as Exhibits E-1 through E-6.) As a result, the opposition has been working desperately around the edges, filing lawsuit after lawsuit in a futile and meritless effort to adversely affect the Tribe's welfare and future by delaying completion of the JIV Gaming Development Project. To date, they have lost every lawsuit filed and have been admonished for re-filing the same claims over and over.[7] They are likely to continue their efforts, however, in the context of the Project.

D5 Opponents of the JIV Gaming Development Project are likely to allege that CEQA review of the Project was improperly segmented from environmental review of either the JIV Gaming Development Project, and/or a duly issued minor Encroachment Permit that merely authorizes the employment of temporary traffic safety measures during construction of that facility. However, the opponents have already attempted both arguments at the Superior Court level in *Jamulians Against the Casino v. Caltrans*, and *County of San Diego v. Caltrans*, and were soundly defeated on all counts. (*See* Exhibits E-3 and E-4, respectively.) We have included for Caltrans's reference a copy of the Amicus Curiae brief that the JIV recently filed with respect to the JAC's appeal of the decision in *Jamulians Against the Casino v. Caltrans*, which explains in detail why each of these environmental review processes is properly distinct from the others. (*See* Exhibit E-6.)

[7] The U.S. Federal Court of Claims stated that "[d]espite vainly prosecuting myriad legal claims in every conceivable forum and fruitlessly propounding inventive and novel legal theories, plaintiffs have continually stared down the face of defeat, personifying Mason Cooley's aphorism, 'if at first you don't succeed, try again, and then try something else.'" (*Rosales v. United States*, 89 Fed. Cl. 656 (*filed* 7/15/2008; *dismissed* 10/14/2009) (*quoting Franklin Sav. Corp. v. United States*, 56 Fed. Cl. 720, 721 (2003)). The court admonished against further lawsuits, stating that the plaintiffs' "current attempt to defy their fate – an attempt this court strongly admonishes plaintiffs to make their last – miscarries again." *Id.* In the ensuing six years, JAC and the County have filed numerous additional unsuccessful lawsuits.

D4 Please see RTC D1.

D5 Please see RTC D1.

COMMENTS	RESPONSES

The DEIR for the Project adeptly distinguishes the CEQA review for the Project from the environmental review for the JIV Gaming Development Project. We appreciate that Caltrans is adhering to that perspective as the CEQA process progresses for the Project.

Discussion

1. Conservative Nature of DEIR

D6 CEQA mandates that an EIR be prepared "with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." (CEQA Guidelines Section 15151.) The DEIR for the Project more than fulfills this mandate by ensuring that all possible environmental impacts of the Project are not only addressed, but indeed, are assumed to be more severe than they really will be, thus ensuring that the DEIR can be relied upon for any purpose, including for right of way acceptance or acquisition by any party (including Caltrans) and for evaluation of the Project by responsible agencies (discussed later in this letter). In particular, the conservative nature of the analysis is demonstrated in the following subject areas:

D7 *Traffic Analysis.* The Project itself would generate no operational traffic. Therefore, if the "project level" traffic analysis only analyzed the existing conditions plus the Project, it would conclude that the Project would significantly improve traffic flow at every intersection and road segment studied, as compared to the conditions that exist "on the ground" right now, which would typically constitute the required "baseline conditions" under CEQA. This conclusion would meet the requirements of CEQA. The DEIR went even further, supplying data on the effects of the Project on the existing background environment with JIV Gaming Development Project traffic also in place. This extra study assists Caltrans to meaningfully determine whether the improvements comprising the Project would effectively improve traffic conditions from the JIV Gaming Development Project that is already under construction. The result of this conservative approach is that this element of the "with project" analysis results in traffic conditions that generally appear to be worse than the existing baseline conditions though, in some locations, even when the JIV Gaming Development Project is incorporated into the Project analysis, the Project will improve traffic operations to a condition that is better than those currently existing "on the ground."

D8 *Air Quality Analysis.* Portions of the air quality analysis are based upon the traffic numbers presented in the Traffic Analysis. Since the Traffic Analysis incorporates traffic from the JIV Gaming Development Project into its "with project" calculations, those portions of the air quality analysis do as well. This means that certain portions of the "project level" air quality analysis (for example, the "hot spot" analysis on pages 2.12-11 to 15 of the DEIR) result in air quality conditions that are worse than existing baseline conditions, despite the fact that the Project does not generate any operational traffic at all.

D6 Please see RTC D1.

D7 Please see RTC D1.

D8 Please see RTC D1.

COMMENTS	RESPONSES

Other conservative air quality assumptions include the following:

D9

- The emissions from all vehicles departing from intersections were modeled at 5 miles per hour, even though departure speeds would be higher. Using the lower departure speed means that the vehicles would have higher levels of emissions than anticipated, which means that the analysis likely overstates those emissions. (*See* DEIR p. 2.12-12.)

D10

- The modeling conditions for 2015 and 2035 used the highest recorded 1-hour background concentration of carbon monoxide (CO) at the El Cajon monitoring station, which occurred in 2012. However, concentrations of CO are expected to drop due to fuel reformulations and more stringent fuel efficiency requirements for new vehicles. Therefore, the future maximum CO concentrations predicted for Project intersections are likely overstated. (*See* DEIR pp. 2.12-12 to 13.)

D11

- The particulate matter analysis for the Project assumes that the San Diego Air Basin is a local nonattainment area and thus assesses the Project using procedures outlined in the *Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas* (EPA).[8] (*See* DEIR p. 2.12-14.) This hot spot analysis would not be necessary under a strict reading of the EPA's guidance, but it was performed in order to ensure that all possible impacts of the Project were identified and provided to the public.

Other Conservative Assumptions.

D12

- The Hazardous Waste/Materials section of the DEIR assumes that soil under the intersection of SR-94/Steele Canyon Road continues to be contaminated from petroleum product releases from an existing 7-Eleven Store, even though the contamination may be fully remediated before the Project is constructed (*see* DEIR pp. 2.11-3 to 4);

D13

- The County of San Diego Summary assumes (for purposes of air quality analysis) a worst-case construction scenario that includes a construction duration of three months, total disturbed area of 10 acres, 40 cubic yards of soil import/export, among others. (*See* DEIR pp. 5-35.) All of these assumptions are extremely conservative in order to ensure that construction emissions are not understated. However, construction conditions are not expected to be as intensive as these conditions, in which case the construction emissions calculations are greater than the emissions would actually be.

[8] This area is designated as a state nonattainment area for both pollutants, but EPA would normally only require PM hot-spot analyses for projects that involved significant levels of diesel vehicle traffic or identified in a PM State Implementation Plan as a localized air quality concern, which is not the case here.

D9 Please see RTC D1.

D10 Please see RTC D1.

D11 Please see RTC D1.

D12 Please see RTC D1.

D13 Please see RTC D1.

COMMENTS	RESPONSES
Mr. David Nagy Caltrans District 11 August 27, 2015 Page 7 2. The Daisy Drive Minimum Footprint Alternative Is the Environmentally Superior Alternative D14 CEQA mandates that an "environmentally superior alternative" be identified from the project and alternatives set forth in the EIR. (CEQA Guidelines Section 15126.6(e)(2); 15126.6(d).) Naturally, the JIV will abide by the decision made by Caltrans as to which access alternative to approve once Caltrans has the opportunity to consider and weigh all of the evidence before it, and will pursue the option selected by Caltrans. Nonetheless, based upon the data in the EIR and the evidence known to the JIV, we express in the letter our views as to the environmentally superior and most feasible and desirable alternative. In the JIV's view, the "Minimum Footprint" option for Daisy Drive (Alternative 2, Option 3) is clearly the environmentally superior alternative for the following reasons. *The Daisy Drive Minimum Footprint Alternative Would Minimize Environmental Impacts As Compared to All Other Alternatives.* This Alternative would result in a measurable decrease in impacts to Multi-Species Conservation Plan (MSCP) lands, State Waters, and sensitive habitats/ vegetation communities when compared to the other Build Alternatives. (*See* DEIR Table S-2.) Temporary impacts to sensitive habitat types would also be minimized under this Alternative. (*Id.*) This is a result of the reduced access road alignment footprint when compared to the other Build Alternatives. It would require the lowest amount of right of way acquisition, and thus land disturbance, of any of the Build Alternatives. (*Id.*) It also would result in improved traffic conditions within the overall study area. (*Id.*) D15 *Neither the Daisy Drive Full Footprint Alternative nor the Reduced Footprint Access Alternative Can Be the Environmentally Superior Alternative, Because They Each Have Increased Impacts as Compared to the Daisy Drive Minimum Footprint Alternative.* As noted earlier, all three of the Daisy Drive Alternatives use the same Daisy Drive access point to and from SR-94. The three Daisy Drive Alternatives vary in that each disturbs differing areas, and has different environmental impacts and right of way requirements. As can be seen in the summary in DEIR Table S-2, the Full Footprint and Reduced Footprint Alternatives each has increased right of way requirements and thus environmental impacts as compared to the Minimum Footprint Alternative. D16 *The Reservation Road Access Alternative Cannot Be the Environmentally Superior Alternative Because It Has Greater Impacts Compared to the Daisy Drive Minimum Footprint Alternative.* As can be seen in the summary in DEIR Table S-2, the Reservation Road Alternative has increased environmental impacts and right of way requirements as compared to the Daisy Drive Minimum Footprint Alternative. D17 *The Melody Road Access Alternative Cannot Be the Environmentally Superior Alternative Because It Would Have the Greatest Amount of Environmental*	D14 Please see RTC D1. D15 Please see RTC D1. D16 Please see RTC D1. D17 Please see RTC D1.

COMMENTS	RESPONSES

D17 cont.

Impacts of Any Alternative. Melody Road would travel through vacant land that is designated as "Hardline Preserve" in the County's Multi-Species Conservation Plan ("MSCP"). The County's Subarea Plan, which implements the MSCP, states that new roads can only be approved if there are no feasible, less environmentally damaging alternatives. To approve Melody Road as the access, the County would need to make findings in contravention to its adopted policies as less environmentally damaging alternatives are available (*e.g.*, Reservation Road and Daisy Drive). Furthermore, the Melody Road Access Alternative would result in the following environmental impacts (all of which are summarized in Table S-2 of the DEIR):

- It is inconsistent with the RTP/RTIP Healthy Environment Goal; Jamul/Dulzura Plan Land Use Goal; Conservation Goal; and Mobility Goal 3, Policy #15, whereas all of the other Access Alternatives would be consistent with land use plans and policies.
- It would require the largest amount of right of way acquisition, and thus land disturbance, of any of the Build Alternatives.
- It could result in a new road in the Hardline Preserve area of the MSCP, which would cause habitat fragmentation and restrict wildlife movement and reduce the utility of Willow Creek, generate a new noise source that could affect sensitive species, and create new opportunities for vehicle/wildlife collisions. This would constitute a significant and unavoidable environmental impact under CEQA, whereas the DEIR analysis concluded that none of the other Alternatives would have any wildlife corridor impacts or result in potentially adverse impacts to sensitive species due to noise or vehicle collisions.
- Prior to mitigation, it would result in permanent impacts to the largest amount of both waters of the United States and waters of the state of California as compared to the other Build Alternatives.
- It would impact approximately 24 square feet of Palmer's goldenbush (*Ericameria palmeri* var. *Palmeri*), whereas none of the other Build Alternatives would impact any special status species.
- Operational and construction-related activities along this alignment would impact at least 16 square feet of dwarf plantain (potential habitat for Quino checkerspot butterfly), and at least 8 square feet of spiny redberry (potential habitat for Hermes copper butterfly), whereas the other Build Alternatives would be placed in areas where there is no suitable habitat for either of these species.

COMMENTS	RESPONSES
Mr. David Nagy Caltrans District 11 August 27, 2015 Page 9 • It is the only Alternative that would have significant cumulative impacts to wildlife corridor and animal mortality. D18 *The No Project Alternative Cannot Be the Environmentally Superior Alternative Because The Magnitude of Its Impacts Outweighs the Impacts of the Build Alternatives.* While the No Project Alternative would have fewer environmental impacts than any of the Build Alternatives, those other impacts are relatively insignificant when weighed against the severity of the traffic impacts that would result from the No Build Alternative. (*See* DEIR Table S-2.) Therefore, the No Build Alternative should not be the Environmentally Superior Alternative. However, even if the No Build Alternative were to constitute the Environmentally Superior Alternative, we agree with Caltrans that a development alternative that is environmentally superior to the other development alternatives must also be chosen. (*See* CEQA Guidelines Section 15126.6(e)(2).) As discussed above, the Daisy Drive Minimum Footprint Access Alternative is that alternative. 3. The Daisy Drive Alternative Is the Superior Alternative Overall Not only is the Daisy Drive Minimum Footprint Alternative the Environmentally Superior Alternative, the Daisy Drive Alternative (all options) in general constitutes the most logical and most feasible of all of the Alternatives. D19 *Daisy Drive Is The Most Logical Alternative.* Daisy Drive is located on Tribal fee land and is contiguous to both the Reservation and SR-94. It has been historically used by the Tribe for access to the Reservation. In fact, it is part of the Indian Reservation Road ("IRR") system and was approved on the federal system in 2008, and is subject to a Tribal Transportation Improvement Program. (*See* Exhibits F and G.) Since appearing on the IRR Inventory, Daisy Drive has been consistently maintained with federal funds by the federal government (or an arm thereof). For example, in 2012, the federal government, through the Reservation Transportation Authority ("RTA"), completed a roadway sealing project of Daisy Drive. (*See* Exhibit H.) In part to address threats to the JIV's ability to access SR-94 via Daisy Drive, the federal government accepted an easement to ensure the JIV's continued access to its Reservation, which was followed by a Correction Deed.[9] (*See* Exhibits I and J.) In connection with this easement, the Federal Highway Administration (the "FHWA") approved the construction of improvements on Daisy Drive as a federal project, thus ensuring that those improvements would be built pursuant to the same federal standards that are applicable to all other federal roads and highways. (*See* Exhibit K.) Therefore, Daisy Drive has essentially been "groomed" to become the access road to the JIV Reservation [9] The only difference between the original Easement Deed and the Correction Deed is that the Correction Deed does not include "in trust" language - however, the easement agreement, and its terms, continue to memorialize the federal government's jurisdiction and control over the easement area. Note that Daisy Drive has historically been, and continues to be, used on a daily basis by the Tribe for access to the Tribe's community building where meetings, gatherings and ceremonies are held. In addition, Daisy Drive provides access to the cemetery adjacent to the Reservation that is owned and controlled by a church unrelated to JIV.	D18 Please see RTC D1. D19 Please see RTC D1.

COMMENTS	RESPONSES
Mr. David Nagy Caltrans District 11 August 27, 2015 Page 10 and JIV Gaming Development Project, and is the logical selection to serve as that access road.	
D20 *Daisy Drive Is The Most Feasible Alternative.* If the County continued to oppose efforts related to the JIV Gaming Development Project, the improvement of the Melody Road Access Alternative (which is located within County jurisdiction) could be stopped or significantly delayed due to the need to obtain County approvals for the work.[10] By contrast, improvements to Daisy Drive are not subject to regulation by the County. (*See* Exhibits G and L.) Rather, the road improvements at Daisy Drive remain federal and Tribal in nature, and therefore, pursuant to federal preemption law, County jurisdiction does not apply. The CEQA Guidelines note that "[a]mong the factors that may be taken into account when addressing the feasibility of alternatives are ... whether proponent can reasonably acquire, control, or otherwise have access to the alternative site." (CEQA Guidelines Section 15126.6(f)). Given the County's jurisdiction over the Melody Road Access Alternative, the JIV has no reasonable expectation of being able to "acquire, control, or otherwise have access" to the right of way and construction permits necessary to implement that Alternative.	D20 Please see RTC D1.
D21 Another independent basis of infeasibility of the Melody Road Access Alternative is that JIV does not own or control the parcel through which the access road would be constructed; while other right of way is generally along the edges of and does not conflict with the use of properties, the Melody Road Access Alternative would dissect and substantially devalue the 87 acre parcel. In addition, the Daisy Drive Alternative would be safer than the Reservation Road Alternative, because of the proposed angle of intersection for the Reservation Road Access Alignment location.	D21 Please see RTC D1.
D22 Finally, the Daisy Drive Alternative would accomplish the following key Project objectives, whereas the No Project Alternative would not accomplish any of them: (a) providing appropriate access road to serve the JIV Gaming Development Project; (b) lessening the most severe direct traffic impacts caused by the JIV Gaming Development Project; (c) improving the geometric design of the main access between SR-94 and the JIV Gaming Development Project; and (d) improving the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road. (*See* DEIR p. S-2.) For these reasons, the Daisy Drive Alternative is a far more feasible and desirable option than the other Alternatives.	D22 Please see RTC D1.
4. The EIR Can Be Relied Upon by Responsible Agencies	
D23 Before any responsible agency may reach a decision on the Project, the decision-making body of the responsible agency must consider the environmental effects of the Project, as those are shown in the EIR. (CEQA Guidelines Section 15096(f).) The DEIR appropriately contains all of the information that is necessary to enable responsible agencies to rely upon it pursuant to this requirement. In fact, Caltrans has gone out of its	D23 Please see RTC D1.

[10] County representatives have several times indicated their opposition to the JIV Gaming Development Project, and have made several attempts to slow it down or stop it altogether, including by participating in lawsuits with that aim.

D23 cont.

way to include in the DEIR a chapter that analyzes in depth the environmental effects of the Project in the context of the regulatory guidelines, thresholds, and standards that the County would apply in its environmental review of those portions of the Project that are located outside of the Caltrans right of way. (*See* DEIR Chapter 5, "County of San Diego.") This information was provided in order to assist the County in its review and future decisions regarding portions of the Project, despite the fact that Caltrans is not subject to any of the analyses or conditions set forth in the chapter. We appreciate Caltrans's thoroughness in providing this information and thus assuring that the EIR can readily be used by the County in its role as a responsible agency with respect to the Project.

Thank you for the opportunity to comment on the DEIR. We appreciate the care that Caltrans has taken with respect to the CEQA process for these very key roadway improvements in the Jamul area. Please do not hesitate to contact me with any questions or comments you may have.

Very truly yours,

Erica Pinto
Chairwoman, Jamul Indian Village

COMMENTS

Stephan C. Volker
Alexis E. Krieg
Stephanie L. Clarke
Daniel P. Garrett-Steinman
Jamey M B. Volker
M. Benjamin Eichenberg

Law Offices of
Stephan C. Volker
436 – 14th Street, Suite 1300
Oakland, California 94612
Tel: (510) 496-0600 ❖ Fax: (510) 496-1366
svolker@volkerlaw.com

11-200.01

August 27, 2015

VIA EMAIL and U.S. POSTAL SERVICE PRIORITY MAIL
SR-94_SR_94_Draft_EIR@dot.ca.gov

David Nagy, Environmental Branch Chief
California Department of Transportation, District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

Re: Comments of Jamulians Against the Casino on the Draft Environmental Impact Report for the State Route 94 Improvement Project, San Diego, California, SCH No. 2013081071

Dear Mr. Nagy,

E1 Jamulians Against the Casino ("JAC") submits the following comments on the California Department of Transportation's ("Caltrans") July 2015 Draft Environmental Impact Report ("DEIR") for the State Route 94 Improvement Project ("project"). As discussed below, the DEIR fails to (1) provide an adequate project description, (2) set forth the project's existing ("baseline") environmental conditions, (3) analyze a reasonable range of alternatives, (4) articulate a consistent and meaningful set of significance thresholds, (5) describe the project's impacts fully and accurately, and (6) present the project's cumulative impacts in a clear and coherent manner. For each of these reasons, the DEIR violates CEQA and must be corrected and recirculated. The importance of accurate and complete analysis of this project's impacts is heightened by SR-94's tragic history of fatal automobile collisions due to this narrow highway's unsafe design and traffic congestion, circumstances that the ill-advised casino proposed by the Jamul Indian Village ("JIV") will only exacerbate.

I. PROJECT DESCRIPTION

An adequate project description is an essential starting point for analysis of a project's environmental impacts, and all environmental impact reports must provide one. 14 California Code of Regulations ["CEQA Guidelines"] § 15124. As directed by the CEQA Guidelines, the project description "shall contain the following information:"

RESPONSES

E1 This comment provides a general, introductory paragraph broadly summarizing alleged deficiencies in the Draft EIR associated with its Project Description, baseline conditions, alternatives analysis, significance thresholds, and Project and cumulative impact analyses. As such, it does not raise any environmental issues concerning the adequacy of the Draft EIR and thus does not require any further response.

COMMENTS

> (a) The precise location and boundaries of the proposed project . . . shown on a detailed map.
>
> (b) A statement of objectives sought by the proposed project[, which] will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR . . . . The statement of objectives should include the underlying purpose of the project.
>
> (c) A general description of the project's technical, economic, and environmental characteristics . . . .

Id.

"An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles* ("*County of Inyo*") (1977) 71 Cal.App.3d 185, 193. By contrast,

> [a] curtailed or distorted project description may stultify the objectives of the reporting process. Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefits against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e. the "no project" alternative) and weigh other alternatives in the balance.

Id. at 192-193.

E2

Rather than "accurate, stable and finite," the DEIR's project description remains so "distorted" that it precludes a full and accurate analysis of the project's environmental impacts and identification of a range of reasonable alternatives. *Id.* Indeed, the DEIR does not even identify – let alone describe and analyze – any specific "proposed project." DEIR S-1, S-3 to S-4, S-10 to S-23, 1-1 to 1-42. The DEIR describes the project as "improvement of five Non-Access Road Intersections and the construction *or* improvement of an access alignment (with all necessary associated improvements), from *either* SR-94 or Melody Road to" JIV Tribal Lands. DEIR 1-7 (emphasis added). It goes on to state that the "Proposed Project alternatives are:" Alternative 1 (Reservation Road Access), Alternative 2 (Daisy Drive Access; Option 1: Full Footprint, Option 2: Reduced Footprint, Option 3: Minimum Footprint), Alternative 3 (Melody Road Access), and Alternative 4 (No Project Alternative). DEIR 1-7. This half-page "description" fails to tell the public which of these alternatives is the proposed project. Consequently, it fails to provide the project description required under CEQA. Pub.Res.Code §§ 21061, 21100(b); CEQA Guidelines §§ 15126, 15126.6, 15362, 15378; *County of Inyo*, 71 Cal.App.3d at 193.

E3

Because the DEIR never identifies the proposed project, Caltrans has fundamentally

RESPONSES

E2 The statements in the unbracketed introductory paragraphs leading into this comment to the CEQA Guidelines and related case law. As such, they do not raise any specific or significant environmental issues concerning the adequacy of the Draft EIR and thus do not require any further response.

The Final EIR's Project description provides an accurate, stable and finite description of the Project as required by CEQA. The Final EIR explains that the Proposed Project entails the improvement of five existing Non-Access Road Intersections as well as construction or improvement of one new access alignment to/from the JIV's separately- and independently-approved gaming facility and SR-94. (see Final EIR Sections 1.1, 1.3 and 1.4.). The Final EIR presents and evaluates three different access alternatives (one of which, Daisy Drive, has three alternate configurations such that five total alternative configurations are studied), and studies each of the alternatives at an equal and consistent level of detail.

The Final EIR describes the project as "the construction or improvement of an access alignment (with all necessary associated improvements) from either SR-94 or Melody Road," highlighting the words "or" and "either" as indicated. The Final EIR states that the access road will involve construction or improvement of an access alignment because, while the Melody Road alternative would require construction of a new road, both Daisy Drive and Reservation Road are existing roads that currently provide access to JIV's lands such that use of either of them as the access road would constitute improvement of an existing road. As to the use of the highlighted word "either," the Melody Road Alternative would provide access directly from Melody Road while the Daisy Drive or Reservation Road Alternatives would provide access directly from SR-94.

COMMENTS	RESPONSES
	E2 cont The Final EIR describes each component of the improvements proposed at the five existing Non-Access Road Intersections (see Final EIR Section 1.4.1 and Figures 1-4 through 1-8), and similarly describes the various access road alignment alternatives and options between SR-94 and the JIV Tribal Lands (Final EIR Sections 1.4.2 through 1.4.4 and Figures 1-9 through 1-13). Moreover, the Final EIR provides all of the Project description information required by CEQA Guidelines Section 15124, including the precise location and boundaries of the Project on detailed local and regional maps (Final EIR Figures 1-1 through 1-13), a clear statement of the Project's purpose and objectives (Final EIR Section 1.3), a general description of the Project's technical, economic and environmental characteristics, and a statement briefly describing the intended uses of the Final EIR (see Final EIR Section 1.1, 1.2, 1.3, 1.4, 2.1).
	E3 As explained in RTC E2, the Final EIR adequately described all components of the Proposed Project and Access Road Alignment alternatives/options and analyzed their potential impacts at a high and equivalent level of detail The format of an EIR's description of the Project and its alternatives and analysis of the project's potential impacts, however, is not subject to any format or any other particular requirements other than those set forth in CEQA Guidelines Section 15124. Lead agencies do often elect to analyze alternatives at such an equal level of detail, particularly to facilitate the choice among alternatives of any evaluated option. The choice to do so here is consistent with the Highway Improvement Agreement between Caltrans and JIV (which mandated that all reasonable access alternatives be explored). The fact that all components of the Proposed Project and Access Road Alignment alternatives/options are equally described and analyzed in tandem does not make the Draft EIR's analysis circular, but rather, provides a clear, linear analysis that facilitates an easier and more meaningful comparative evaluation than if the Final EIR were formatted to provide the information in separate, distant sections.

COMMENTS

California Department of Transportation
August 27, 2015
Page 3

E3 cont.

misapplied CEQA. Public Resources Code section 21100(b) *requires* that the DEIR "include a detailed statement setting forth . . .: (1) All significant effects on the environment of the *proposed project* . . . [and] (4) *Alternatives to the proposed project*." Pub.Res.Code § 21100(b) (emphasis added); *see also* CEQA Guidelines §§ 15126, 15126.6. Without a "proposed project," the DEIR cannot adequately analyze the significant impacts or consider alternatives to that project. "Under CEQA, the range of alternatives that an EIR must study in detail *is defined in relation to* the adverse environmental impacts *of the proposed project*." *In re Bay Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1167. The DEIR has made it utterly impossible to define alternatives in relation to the "adverse environmental impacts of the *proposed project*" since there is none. *Id.*; DEIR 1-7. This omission is especially egregious given CEQA's demand that proposed projects be analyzed in greater detail than potential alternatives, and that the alternatives are intended to lessen the significant impacts of the proposed project. CEQA Guidelines §§ 15064, 15124, 15126, 15126.2, 15126.4, 15126.6. The DEIR's analysis here is circular, making the proposed project and the alternatives one in the same and precluding informed decisionmaking.

E4

Furthermore, even the information provided about the alternatives that are presented as the proposed project is misleading in violation of CEQA. *County of Inyo*, 71 Cal.App.3d at 192-193. The DEIR claims that only 5 intersections will be affected by the Build Alternatives, but then sneaks in additional intersection improvements (SR-94/Melody Road and SR-94/Reservation Road) in the Access Road Alignment portion of the project. DEIR 1-1 to 1-2. This attempt to downplay the project's impacts by distorting the project's description cannot stand. *County of Inyo*, 71 Cal.App.3d at 192-193; *Laurel Heights Improvement Association v. Regents of University of California* ("*Laurel Heights*") (1988) 47 Cal.3d 376, 404. The DEIR states that JIV's Final Tribal Environmental Evaluation ("FTEE") "concluded that operation traffic from the Gaming Development Project would result in significant direct impacts to [all] six intersections along SR-94." DEIR 1-4. However, the very next sentence discusses "those seven intersections." *Id.* Are five, six, or seven intersections going to be affected? And how is the lay reader supposed to know? Incomplete and inaccurate information makes it difficult for the reader to understand the DEIR, undermining its very purpose. Pub.Res.Code §§ 21061, 21100; CEQA Guidelines §§ 15124, 15126, 15378.

E5

The information provided on the proposed project alternatives is also incomplete. "To minimize traffic disturbance and maintain traffic movements on SR-94, detailed stage construction and traffic handling plans would be prepared during development of the final plans, specifications and estimate (PS&E) for the proposed project." DEIR 1-21. However, this information should be presented now, in the DEIR, rather than withheld from public review until *after* the project is approved. Pub.Res.Code § 21100; CEQA Guidelines § 15124. Withholding this critical information about the project and its impacts stymies public understanding and analysis of the project and the means by which its impacts can be avoided or mitigated, in violation of CEQA. *Id.* Similarly, the DEIR fails to mention the new parking lot that JIV has just graded east of SR-94 for use in constructing its proposed casino. This parking lot has and will have aesthetic, biological, water, traffic, and safety impacts, and must be analyzed in the

RESPONSES

E4 The commenter incorrectly claims that the Draft EIR is misleading by referencing allegedly inconsistent information concerning the number of SR-94 intersections affected by the Project. The Draft EIR explains that no matter which Access Road Alignment is ultimately approved, a total of seven intersections will be improved to mitigate traffic impacts of the JIV Gaming Facility Project. Interestingly, the Draft EIR's various references to five, six and seven intersections are correct and not misleading no matter which Access Road Alignment is ultimately approved. The Draft EIR analyzes improvements to five stand-alone intersections, as well as an access road that contains two additional intersections (see Draft EIR pages 1-1, 1-2, 1-7, 1-19, 1-25, 1-37). The sixth and seventh intersections are related to the access improvements. One is the intersection between one of the three alternative Access Alignments and SR 94 or Melody Road, and the other is an additional intersection that will be constructed as part of the access improvements no matter which of the alternative Access Roads is selected.

Chapter 1, Section 1.1 Proposed Project identifies five "non-access road" intersections. Chapter 1 then identifies the three access road alignments. Following this, the document states, "The scope of each of the Access Road Alignments includes improvements to the SR-94/Melody Road intersection, in addition to the improvement or creation of the access itself." (see Final EIR pages 1-1, 1-2)

Section 1.2.2 Need for the Project includes Table 1-1 (page 1-6), which presents data for existing and future peak-hour intersection levels of service. The intersections listed in this table include the five stand-alone, non-access intersections, as well as the two intersections for each of the access road alignments. Thus, the Draft EIR's discussion reflects the fact that seven intersections will be improved and that those seven consist of five

COMMENTS	RESPONSES
	E4 cont stand-alone intersections (common to all Build Alternatives), a sixth intersection (common to all Access Road Alignment options), and a seventh intersection (entirely dependent on which Access Road Alignment option is ultimately selected and approved by Caltrans).
	E5 The Draft EIR's Project description is complete. First, preparation of the detailed stage construction and traffic handling plans is not necessary and in fact would beimpractical at this stage. The comment focuses on plans mentioned in the "Construction Schedule" discussion of the Reservation Road Access Road Alignment. Such detailed construction staging and traffic handling plans are unnecessary because CEQA requires a general description of the Project's technical /engineering characteristics (CEQA Guidelines Section 15124(c)), and the required general information concerning the construction schedule and related traffic handling components of each of the three construction stages for the Reservation Road Access Road Alignment is provided (see Final EIR page 1-21.) Further, it would be not only inefficient but impractical to prepare such final and detailed construction staging and related traffic handling plans until Caltrans selects an alternative. When these plans are prepared, they will focus on minutiae that will not provide any additional information relevant to the analysis of potential impacts beyond that which is already disclosed in the text of the Final EIR and the graphic figures showing the extent and footprint of all work proposed along the entirety of the affected intersections and roadway segments of SR-94. Second, the parking lot east of SR-94 referenced by the commenter is currently being used for temporary parking associated with the construction of the JIV Gaming Facility Project, which is currently under construction. The JIV Gaming Facility Project was separately evaluated in the Final TEE and approved by the JIV in 2013, and a temporary use permit from the County of San Diego was issued to JIV for construction worker parking for construction workers performing work on the JIV gaming facility. This temporary parking lot is not an element of the SR-94 Improvement Project.

COMMENTS

DEIR before it may be approved for JIV's use during construction and operation of the project. Instead of acknowledging and assessing these impacts, the DEIR impermissibly ignores them and the parking lot altogether. Doing so violates CEQA.

E6 Making matters worse, the DEIR's Table 1-1 includes a column entitled "Future (2035) with Proposed Project Conditions" that misdescribes the existing conditions. DEIR 1-6. Contrary to this column's title, it appears that the "proposed project" to which Caltrans is referring is actually JIV's casino, since the table's information is fundamentally inconsistent with the conclusions presented elsewhere about the SR 94 Improvement Project. *Compare* DEIR 1-6 *with* DEIR S-11 to S-12. Not only does the DEIR fail to present a proposed project, it also misleadingly calls the casino the proposed project.

E7 The DEIR's failure to identify and describe the proposed project is a fatal flaw that undermines the entirety of the DEIR's discussion and analysis. Without a proposed project, the DEIR cannot identify the significant impacts of that project nor alternatives that would reduce those impacts.

II. BASELINE/EXISTING CONDITIONS

E8 CEQA requires that the DEIR "include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published," which "will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant." CEQA Guidelines § 15125(a). An accurate baseline is necessary to understand the significance of the project's impacts. *Environmental Planning and Information Council v. County of El Dorado* ("*EPIC*") (1982) 131 Cal.App.3d 350, 354. Contrary to this requirement, the DEIR entirely fails to establish a baseline against which to analyze the project's impacts. DEIR 1-1 to 1-42. Rather, the DEIR only discusses existing conditions for each impact area, and even where it does use the word baseline, it fails to employ any consistent standard against which to weigh the project's impacts. *Id.* A baseline must be "more than raw data; it requires also an analysis that will provide decision makers with sufficient information to make intelligent decisions," and that cannot be done when the reader must "cobbl[e] together information included in and appended to the EIR." *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 955.

The DEIR fails to present a baseline against which to compare the whole of the project. DEIR 1-1 to 1-7. The only mention of a baseline occurs with regard to traffic conditions in sections 2.2 (Growth) and 2.4 (Traffic) of the DEIR. DEIR 2.2-2 to 2.2-3, 2.4-3 to 2.4-5. And even those brief discussions are inconsistent with each other and the DEIR's treatment of impacts elsewhere. *Id.* Presumably, based on the language in section 2.2 and 2.4 of the DEIR, Caltrans intended the baseline to be the existing conditions as of the date of the Notice of Preparation (August 2013). But the EIR does not state that fact anywhere and the impact analysis is not compared to that baseline. Instead, the DEIR analyzed the project against the projected traffic patterns *after* JIV's casino becomes operational.

RESPONSES

E6 Table 1-1 located in Section 1.2.2 Need for the Project is intended to show existing and future conditions, which assists in presenting the need for the Proposed Project. The heading of the Future (2035) column is incorrect and should be "Future (2035) with No Build Conditions." The title has been corrected for the Final EIR.

E7 This comment provides a conclusory paragraph that summarizes comments made in the "Project Description" section of the commenter's letter. It does not address any environmental issues. Please see RTC E2-E6.

E8 The first paragraph in this comment contains references to and quotes from CEQA Guidelines Section 15125 and case law and does not raise any specific significant environmental issues concerning the adequacy of the Draft EIR. Accordingly, no further response is required to that element of the comment.

As to the baseline issue, the Final EIR accurately describes the baseline as the existing environmental conditions in the vicinity of the Project, and its analysis of the impacts of the SR-94 Improvement Project as compared against the baseline conditions complies with CEQA. Indeed, as explained at the beginning of Chapter 2 on page 2.0-1, for every relevant topic addressed, the Final EIR presents both the regulatory setting and affected environment before identifying and discussing the Project's potential impacts and proposed avoidance, minimization, and /or mitigation measures.

With respect to traffic conditions, the Final EIR states that "the baseline conditions for traffic are defined as the traffic volumes that exist at the time the Notice of Preparation (NOP) is prepared for the Final EIR. The NOP was issued by the State Clearinghouse on August 26, 2013." (see Final EIR page 2.4-3.) Moreover, on the next page, the Final EIR explains that existing peak-hour traffic counts for all study intersections were collected between 2009 and 2012. An evaluation of historical traffic counts along SR-94 dating back to 2001 was conducted in 2013 and Caltrans

COMMENTS	RESPONSES
	E8 cont determined that the existing peak-hour traffic counts were the best representation of the baseline conditions within the study area in 2013, justifying the use of those peak-hour volume counts for the baseline conditions. (See Final EIR, page 2.4-4.) The Final EIR discusses the significant connection between the SR-94 Improvement Project and the JIV gaming facility and states that both the stand-alone Non-Access Road intersection and Access Road Alignment improvements in the SR-94 Improvement Project were specifically identified as mitigation measures in the Final TEE for the gaming facility and deemed necessary to alleviate impacts caused by gaming facility traffic. The JIV gaming facility is currently under construction and could be open for business before the SR-94 Improvement Project is completed and operational. Accordingly, the Final EIR defined the existing baseline conditions to include estimated gaming facility traffic because the gaming facility traffic may exist prior to operation of the project improvements and is the underlying reason for the proposed improvements. Please see RTC B1. Thus, ignoring the gaming facility traffic and simply assessing the SR-94 Improvement Project compared to the existing traffic conditions would provide meaningless information. The JIV would have no reason to, and would not undertake the time and expense to, propose and implement the SR-94 Improvement Project if there were no gaming facility that necessitated such transportation improvements. Further, omitting the gaming facility traffic from the existing baseline conditions would be misleading and not provide meaningful information given that a key component of the review and approval of the SR-94 Improvement Project involves a choice by Caltrans among several alternative Access Road Alignments for the gaming facility.

COMMENTS

E8 cont.

For example, after acknowledging, as it must, that the baseline for the traffic impact analysis is "defined as the traffic volumes that existed at the time the [NOP] is prepared for the EIR," the DEIR then attempts to change the baseline right under the reader's nose. DEIR 2.4-3. In the Environmental Consequences discussion, the DEIR declares that it will analyze impacts under "three traffic scenarios:" (1) Existing Conditions (2013), including "Existing (2013) with JIV Gaming Development Project Conditions," and "Existing (2013) with JIV Gaming Development Project with Proposed Project Improvement Conditions;" (2) Near Term Conditions (2015), including "Near Term No Build Conditions" which account for "project traffic growth based on the addition of the JIV Gaming Development Project and other potential projects," and the same with the Proposed Project improvements; and (3) Horizon Year Conditions (2013) also accounting for JIV Casino traffic. DEIR 2.4-11 to 2.4-13. *None of the traffic conditions relied on for analysis compare the project with the baseline "traffic volumes that existed" in August 2013. Id.*; CEQA Guidelines § 15125(a). While Caltrans may not have direct authority to prohibit JIV from building the casino, it must adequately analyze its SR-94 project based on the conditions as they existed at the time the NOP was published, not as they are anticipated to be in the future.[1]

E9

Similarly, the DEIR's claim that "existing peak-hour traffic counts were the best representation for baseline conditions within the study area" also fails. DEIR 2.4-4. The DEIR asserts that "[p]eak hour volumes are used to assess the performance of intersection operations because they represent the time of day when highest traffic volumes travel through the intersections." DEIR 2.4-4. This baseline is misleading. Although it is useful to determine peak traffic conditions, a full understanding of the rural nature of the community also necessitates a study of existing conditions during non-peak hours, and specifically, during nighttime hours when existing traffic is minimal, because those are the times when traffic from the casino will have its most dramatic impacts on this quiet community. The failure to analyze traffic conditions at times of greatest impact ignores CEQA's requirement that an EIR must describe existing conditions as a baseline against which to compare the project. CEQA Guidelines § 15125(a).

E10

The DEIR's reliance on future predicted traffic as the baseline for analyzing the project contravenes well-settled law and Caltrans' own policies. In *Communities for a Better Environment v. South Coast Air Quality Management District* ("*CBE*") (2010) 48 Cal.4th 310, the court held that the appropriate baseline was not the "maximum capacity allowed under prior equipment permits, [but] rather . . . the physical conditions actually existing at the time of analysis." *Id.* at 316. Similarly, the court in *EPIC* declared the EIRs at issue inadequate as

[1] While a lead agency has discretion to "substitute a baseline consisting of environmental conditions projected to exist in the future, the agency must justify its decision by showing an existing conditions analysis would be misleading or without informational value." *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 457. The DEIR fails to explicitly set *any* baseline, let alone justify a decision to deviate from the norm.

RESPONSES

E9 The traffic analysis in the EIR is intended to assist in determining how well the alternatives meet the project objectives, which are to address the JIV gaming facility's traffic impacts to SR-94, and if the alternatives will result in other significant traffic impacts. Thus, using the peak-hour estimates are appropriate. The commenter's concern with the impacts of the traffic from the JIV gaming facility on the rural character of the community is outside the stated Project Objectives (see Draft EIR Section 1.2.1) and not in response to any identified impact from the Project. Please see RTC B1 and RTC C1.

E10 Please see RTC E8 above, which states that the Final EIR properly used recent peak-hour traffic counts to establish the existing baseline traffic conditions and explains why the Final EIR included traffic from the JIV Gaming Facility in its existing baseline conditions for purposes of its analysis of the potential impacts of the SR-94 Improvement Project.

COMMENTS

informative documents because they "fail to report upon the potential environmental impacts of the [project] on the existing environment." 131 Cal.App.3d at 356. Instead, like Caltrans' DEIR here, the EIRs invalidated in *EPIC* compared the project to future projected growth in violation of CEQA. *Id.*

E11 Rejecting an EIR similar to Caltrans' deficient DEIR, the court in *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* (2010) 190 Cal.App.4th 1351, held that "impacts of the project must be measured against current, existing physical conditions and a comparison against a baseline as it might exist in 2020 cannot substitute for a comparison with current, existing conditions." *Id.* at 1358 (internal quotation omitted). The court explained that "decision makers and the public lacked complete information because an improper baseline [composed of predicted future traffic conditions] was used for determining traffic and related impacts[, which] constituted a failure to proceed in the manner required by law." *Id.* at 1383. While *Sunnyvale* acknowledged that "discussions of the foreseeable changes and expected future conditions" "may be necessary to an intelligent understanding of a project's impacts over time and full compliance with CEQA," it held that this *additional* review did not obviate the *primary* need for an accurate baseline composed of existing conditions. *Id.* at 1381.

E12 Caltrans' DEIR also violates its own internal guidance memorandum, which echoes, as it must, the holding of the *Sunnyvale* ruling. Caltrans, Memorandum Re: Policy Implications of *Sunnyvale West Neighborhood Association et al v. City of Sunnyvale*, 190 Cal.App.4th 1351 (2010), July 28, 2011, attached hereto as Exhibit 1. Caltrans specifically declares that "[b]aseline conditions are the existing physical conditions in the affected area as they exist at the time the notice of preparation is published," and that "it is imperative under CEQA that impact determinations are linked back to the baseline conditions and then discussed explicitly in the environmental documentation." Exhibit 1, p. 1. The SR-94 Improvement Project DEIR fails to make this comparison.

E13 Instead, the DEIR relies on JIV's FTEE to identify the casino's traffic impacts and then compares all project impacts to those speculative predictions. However, the DEIR fails to incorporate the FTEE as an appendix or by reference, and therefore any conclusions or analysis based on the FTEE violate CEQA. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* ("*Vineyard*") (2007) 40 Cal.4th 412, 442 (if an agency "relied on information not actually incorporated or described and referenced in the FEIR, it failed to proceed in the manner provided in CEQA"); *County of Amador*, 76 Cal.App.4th at 955 (it should not be necessary for a reader to cobble together information to determine the baseline). Furthermore, there is no analysis, let alone assurance, confirming that the FTEE's predictions are correct or that the measures listed therein will be implemented, and Caltrans performs no independent analysis to determine the validity of these claims. Instead, the DEIR attempts to substitute for its required but absent analysis the wishful thinking that JIV will "make good faith efforts to implement these improvements, pursuant to the terms of the Tribal-State Gaming Compact and the Tribal Gaming Project Environmental Review Ordinance." DEIR 1-4. The DEIR's failure to provide this essential analysis violates CEQA's informational purpose and prevents the public

RESPONSES

E11 The Final EIR identifies and uses an existing conditions baseline (which includes changes that may occur prior to use of the SR 94 Improvements, including opening and operation of the JIV Gaming development) as well as a near- and long-term future baselines to adequately assess the Project's impacts both now and in those near and more distant cumulative scenarios. Please see RTC E8.

E12 The Caltrans memorandum referenced by the commenter is intended to provide internal policy guidance. Accordingly, the memo does not amount to binding law or change the actual provisions of CEQA, the CEQA Guidelines or CEQA case law.

E13 The Final EIR does not rely on the JIV's Final TEE to identify the casino traffic impacts. Caltrans prepared a new study to evaluate the traffic impacts of the Proposed Project (roadway improvements). All findings and information reported in the Final EIR are based on the new traffic study, not the Final TEE traffic study. The Final EIR does correctly and reasonably reference the Final TEE and the 1999 Tribal-State Gaming Compact to describe the background of the JIV gaming facility and explain that the Tribe dutifully proposed the SR-94 Improvement Project to Caltrans and in doing so complied with its obligation under the Compact to make good faith efforts to implement the mitigation measures identified in the Final TEE.

COMMENTS

and decisionmakers from fully considering the impacts of the project. CEQA Guidelines §§ 15125, 15144; *Vineyard*, 40 Cal.4th at 428; *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* ("*Berkeley Keep Jets*") (2001) 91 Cal.App.4th 1344, 1355-1356.

III. ALTERNATIVES

"An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making." *Laurel Heights*, 47 Cal.3d at 404. An alternative may "not be eliminated from consideration solely because it would impede to some extent the attainment of the project's objectives." *Habitat and Watershed Caretakers v. City of Santa Cruz* ("*HAWC*") (2013) 213 Cal.App.4th 1277, 1304; CEQA Guidelines § 15126.6(b). "The EIR is required to make an in-depth discussion of those alternatives identified as at least potentially feasible." *HAWC*, 213 Cal.App.4th at 1303 (emphasis and quotation omitted). Here, the DEIR's discussion of alternatives fails to provide this required discussion and therefore violates CEQA. The DEIR's treatment of alternatives is fatally flawed in three principal respects.

E14 First, the alternatives discussed cannot be compared to the proposed project because there is no proposed project with which to compare the alternatives. Pub.Res.Code § 21100; CEQA Guidelines § 15126.6. CEQA precludes an agency from approving a project "if there are feasible alternatives . . . available which would substantially lessen the significant environmental effects" of the project. Pub.Res.Code § 21002. Here, however, the alternatives cannot be deemed to minimize the project's impacts since there is no proposed project whose impacts can be evaluated against those of the alternatives.

E15 Second, the DEIR's description of the alternatives is confusing and misleading. DEIR 1-7 to 1-41. The DEIR's "common design features" section states that the "Build Alternatives share common features related to Proposed Project design." However, this statement is confusing because there is no "proposed project" whose design can be compared to these supposed "common features." DEIR 1-8.

E16 Third, the DEIR's range of alternatives considered is too narrow, in violation of CEQA Guidelines section 15126.6. The DEIR does not consider any alternatives to the "Non-Access Road Intersections." DEIR 1-7 to 1-41. Instead, it precludes consideration of the reasonable range of alternatives that CEQA requires by restricting its range of alternatives to those examined in JIV's FTEE. The alternatives considered in the DEIR "were an outgrowth of the Jamul Final Tribal EE" which "identified three access locations . . . [and] five other intersection improvements." DEIR 1-42. By basing its alternatives solely on the applicant's analysis, Caltrans has failed to perform the necessary independent review. CEQA Guidelines § 15126.6; *Laurel Heights*, 47 Cal.3d at 404.

IV. COUNTY OF SAN DIEGO ANALYSIS

E17 Caltrans fails to properly address the essential question to be explored in the DEIR –

RESPONSES

E14 The unbracketed introductory paragraph of this comment consists of quotes from various published CEQA decisions and does not raise any specific issues concerning the adequacy of the Final EIR; thus, they require no further response.

Please see RTC E2 above demonstrating that the Final EIR adequately describes the SR-94 Improvement Project. Caltrans' decision to provide in the Final EIR descriptions and impact analyses of all Project components and access alternatives/options in a consistent side-by-side comparative discussion does not violate CEQA, but rather advances the flexibility to select any option.

E15 Please see RTC E2 regarding the Draft EIR's description of all Project components and impact analysis thereof and RTC E4 regarding the Draft EIR's description of the work to the five Non-Access Road intersections comprising the "common design features" of all three Access Road Alignment alternatives/options. As noted therein, the Final EIR clearly states that five Non-Access Road Intersections would be improved under each alternative (i.e., SR-94/Jamacha Boulevard, SR-94/ Jamacha Road, SR-94/Steele Canyon Road, SR-94/Lyons Valley Road, and SR-94/Maxfield Road) and details all improvements proposed at each intersection in Section 1.4.1.

E16 The Final EIR provides an adequate comparative analysis of areasonable range of alternatives as required by CEQA. Notably, the commenter does not suggest any additional feasible alternatives that should have been, but were not, included in the Final EIR. Moreover, Caltrans did not accept the JIV's proposed improvements without doing its own independent review. Caltrans has been analyzing the Proposed Project for over 2 years and has independently confirmed, together with its traffic engineers and consultants, that the improvements to the five Non-Access Road intersections are indeed warranted and necessary to alleviate impacts associated with increased congestion and delay that will result from the increased traffic from the gaming facility. No alternative locations or designs for the improvements needed at the five Non-Access Road intersections are feasible or even reasonable given that the improvements are intersection-specific and designed to comply with Caltrans standards that both ensure desired traffic conditions and improve public safety. Caltrans also independently reviewed the proposed access road locations and assisted in the development of all access road alignment alternatives and options.

COMMENTS	RESPONSES
	E17 The Draft EIR's analysis of the Project's potential impacts related to Project components proposed outside the Caltrans ROW, identified as the "County Improvements," does not violate CEQA. As explained in Chapter 5 of the Final EIR, Caltrans is not subject to County standards and as lead agency has the discretion to develop and use its own thresholds of significance in the Final EIR. However, because the JIV will likely need to apply to the County for various permits/approvals associated with the County Improvements and the County, as a Responsible Agency, is required to use the CaltransEIR for its review of and issuance of approvals for the County Improvements, Caltrans decided that it was appropriate to analyze the Project in Chapter 5 under the County's specific thresholds of significance, both for the County's benefit and for informational purposes. The information in Chapter 5 is not intended to reflect Caltrans' CEQA conclusions. Caltrans did not ignore the applicable county plans and standards. Indeed, Chapter 2.1's analysis of the Project's consistency with state, regional and local land use plans and programs includes an extensive analysis of a number of County plans such as SANDAG's Regional Transportation Plan and Regional Transportation Improvement Plan, the County's General Plan and associated Valle de Oro Community and Jamul/Dulzura Subregional Plans, as well as the County's Multiple Species Conservation Plan.

COMMENTS

E17 cont.

whether the Project has significant impacts – because the DEIR presents different and conflicting significance thresholds and impacts analysis for itself, and for the County of San Diego (Chapter 2 and Chapter 5, respectively), and never attempts to analyze and reconcile these differences. Contrary to CEQA, Caltrans asserts that it need not consider the County's standards in determining whether an impact is significant. *See, e.g.*, DEIR 5-2 ("such standards and conditions are not being used by Caltrans to comply with its CEQA responsibilities as Lead Agency"); *see also* DEIR 5-1 (Chapter 5's analysis "is provided for informational purposes only and is solely intended to assist the County"). But the significance of an environmental impact does not change solely based on the entity making an approval. *Protect The Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109. "[I]n preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect." *Id.* Caltrans' DEIR fails to do this because it fails to consider – let alone analyze – the County's standards for determining significance.

For example, Chapter 5 of the DEIR identifies several areas where County standards may be exceeded, or additional mitigation may be required, but Caltrans does not present these areas as having significant CEQA impacts. These include impacts on biological resources, hazardous materials, geology and soils and traffic.[2] *Compare* DEIR Chapter 5 *with* DEIR Chapter 4. Because Caltrans fails to analyze whether the project's impacts are significant in light of the County's generally more stringent thresholds, Caltrans' presentation of the significant impacts of the SR-94 Improvements Project is inadequate.

V. ENVIRONMENTAL IMPACTS

CEQA mandates that the DEIR adequately analyze a project's effects in order to foster informed decisionmaking and to allow the public to understand those impacts. Pub.Res.Code § 21002.1; CEQA Guidelines §§ 15121, 15126, 15126.2. Where possible, the lead agency must employ feasible mitigation measures that could minimize the project's significant adverse impacts. Pub.Res.Code § 21002; Guidelines §§ 15121, 15126.4. As shown below, the DEIR fails to adequately address the project's impacts. Its failure to provide information in an organized, concise, and accurate manner violates CEQA's informational purpose and prevents the public and decisionmakers from fully considering those impacts. CEQA Guidelines §§ 15121, 15144; *Vineyard*, 40 Cal.4th at 428; *Berkeley Keep Jets*, 91 Cal.App.4th at 1355-1356.

E18

By failing to specifically identify a proposed project and correctly describe its baseline,

---

[2] For example, Chapter 5's traffic conclusion asserts that the project would not exceed County standards despite the fact that its underlying analysis states that the intersection of "Jamacha Boulevard/SR-94 would face increases in delay that "*would exceed County standards* related to allowable increases at congested intersections." DEIR 5-9, 5-10 (emphasis added).

RESPONSES

E18 Please see RTC E2 and E8 above demonstrating: (1) that the Final EIR adequately describes the SR-94 Improvement Project and that the fact that the Final EIR provides descriptions and impact analyses of all Project components and access alternatives/options in a consistent side-by-side comparative discussion does not violate CEQA; and (2) that the Final EIR properly used recent peak-hour traffic counts to establish the existing baseline traffic conditions and explains why the Final EIR included traffic from the JIV gaming facility in its baseline conditions for purposes of its analysis of the potential impacts of the SR-94 Improvement Project.

The Draft EIR's analysis is not truncated and oversimplified because it discusses alternatives 1 through 3 together. The comment does not provide any specific examples to particular impact analyses that allegedly fail to comply with CEQA due to a truncated or oversimplified analysis. The Final EIR adequately and efficiently analyzes the Project's impacts, and repeatedly differentiates between the alternatives as well as the common design components of each (i.e., the five Non-Access intersections) within the actual impact analyses where necessary. Similarly, where impacts would result equally from all project components, the Final EIR so notes. For example, in the traffic impact analysis section, the Final EIR carefully distinguishes and separately analyzes the impacts of the project and all Access Road Alignment alternatives on each of the study intersections and roadway segments. (see Draft EIR pages 2.4-37 through 2.4-69.) Again, it is often useful to analyze impacts of all Project components together where they have similar or no impacts with respect to a particular resource and the Final EIR does so where appropriate. For example, the Final EIR understandably analyzes and discounts any potential floodplain impacts from the Project because none of the Project components are located within the 100-year floodplain, but then further analyzes the potential floodplain impacts of the proposed improvements at the SR-94/ Jamacha Road and SR-94/Melody Road because they are located adjacent to existing drainage channels (see Draft EIR pages 2.8-5 through 2.8-6).

COMMENTS

E18 cont.

the DEIR precludes a complete and accurate discussion of the project's impacts. For example, the vast majority of the impact analysis sections are truncated and oversimplified. Indeed, 16 of 21 impact discussion sections simply lump alternatives 1 through 3 together in the environmental consequences analysis. DEIR 2.2-2 to 2.2-4, 2.4-37 to 2.4-69, 2.5-3 to 2.5-4, 2.7-4, 2.8-3 to 2.8-6, 2.9-8 to 2.9-11, 2.10-4 to 2.10-6, 2.11-6 to 2.11-7, 2.12-9 to 2.12-16, 2.14-6 to 2.14-11, 2.15-2 to 2.15-3, 2.17-4 to 2.17-6, 2.18-2 to 2.18-3, 2.19-3 to 2.19-6, 2.20-4 to 2.20-6, 2.21-1. This method of analysis stymies CEQA's two primary purposes of assuring that the lead agency makes an informed decision by requiring that the DEIR consider alternatives that could lessen the project's impacts. Pub.Res.Code § 21002; CEQA Guidelines §§ 15121, 15126.6, 15144.

E19

Contrary to these mandates, the DEIR's impacts discussions are vague and confusing because the DEIR impermissibly conflates the alternatives and their impacts. DEIR 2.5-2 (construction of alternatives 1 through 3 "would require minor relocation of existing facilities including electrical, potable water, surface water drainage," and others, with no discussion of individual alternative components or their impacts), 2.7-4 (admitting potential cultural resource impacts but failing to distinguish how each alternative could affect those resources), 2.8-4 ("The channel and drainage improvements required [for Alternatives 1-3] include clearing, grading, widening of existing roadway for expanded intersections, and other improvements), 2.9-9 ("The impacts of [grading] activities would vary based on [] construction activities," which the DEIR does not differentiate), 2.10-4 ("Some of the proposed intersection improvements and Access Road Alignment improvements would be built into the sloped areas adjacent to the existing roadways," but not listing which improvements), 2.11-6 ("Treated wood waste may or may not be present"), 2.14-6 ("Not all activities would be required at each intersection; rather, this list represents the range of anticipated activities"), 2.14-8 ("Noise impacts would vary from one Access Road Alignment to another depending upon the distance between the road alignment in question and noise receptors in the area"), 2.15-2 ("The Build Alternatives would use energy during construction in the same manner; however, they would vary in degree depending on the amount of work required to complete each task"). The DEIR's discussion of all of the alternatives lumped together makes it impossible for the public and decisionmakers to distinguish between the alternatives, let alone consider which will lessen the project's impacts. This confusing conflation of the alternatives and their impacts violates CEQA. Pub.Res.Code § 21002; CEQA Guidelines § 15121; *Vineyard*, 40 Cal.4th at 428.

E20

Furthermore, Caltrans' piecemealing of the project into its construction and operation phases could, and most likely would, affect the conclusions drawn regarding its impacts on growth, community character, air quality, biology, and hydrology, among others. The DEIR also posits that "[i]n order to evaluate the environmental impacts for each alternative, the impact analysis does not differentiate in which jurisdiction the improvements for that particular alternative . . . are located." DEIR 2.0-2. But this method is illogical and misapplies the CEQA process. The DEIR must identify locations of impacts to assess their severity and potential mitigations. Jurisdictional boundaries do not excuse the omission of required impact analysis; rather, where other jurisdictions are involved, CEQA mandates analysis of the "whole" of the activity being approved, regardless of whether it "may be subject to several governmental

RESPONSES

E19 The analyses of Project Alternatives in the Final EIR were combined when the impact analysis and level of impact for each were similar. In these circumstances, Caltrans combined impact discussions in an effort to reduce redundancy and decrease paper use. For a comparison of the impact for each Alternative, please see Table Table 4-1 through 4-3 , which group impacts into "Less-than-Significant", "Less than Significant Following Mitigation", and "Significant Unavoidable" categories with references to the applicable Alternative and Issue.

Please see RTC E2 and E18.

E20 Here the commenter refers to "piecemealing of the project." Because the commenter does not provide any specific examples of Project components impermissibly segmented or refer to sections or pages where such "piecemealing" negatively affected the impact analysis, no further response to this first point is needed. Nevertheless, Caltrans notes that potential impacts caused during construction would not overlap with impacts of post-construction operation of the improved intersections and roadways (e.g., air quality impacts), Potential impacts caused by construction would not be repeated during operation (e.g., biological impacts). Thus, the Draft EIR's analysis is complete and not piecemeal.

Identification of the jurisdiction within which each project component lies is irrelevant to the environmental effect of the Project as a whole on the existing physical environment Caltrans has no obligation to indicate the location of the jurisdictional boundaries of the various regulatory/permitting agencies, as those boundaries have no effect on the environmental impact analyses related to these agencies. Furthermore, as the Final EIR indicates, Caltrans has consulted with all responsible and trustee agencies and the Final EIR lists all potential permits/approvals required for the whole of the Project from those agencies (see Final EIR, Section 1.7 and Table 1-11).

COMMENTS

agencies." CEQA Guidelines § 15378(a), (c). And, where there are multiple agency approvals, CEQA requires a detailed discussion of what permits or consultation are necessary with respect to each agency. CEQA Guidelines § 15124(d).

A. LAND USE

E21 The project conflicts with surrounding land uses. "The SR-94 corridor is designated as a Scenic Highway in the County General Plan Conservation and Open Space Element." DEIR 2.6-1. It "passes through the valley floor with views of rolling hills and distant peaks and ranges." *Id.* "[E]xisting land uses [near the [project's] access road alignments] consist primarily of rural residences and open space." DEIR 2.1-3. The area is "characterized by rolling hills with flat, broad valleys." DEIR 2.1-2. "Residential, open space, preserve/reserve, and tribal land surround the Access Road Alignment." DEIR 2.1-7; *see also* DEIR 2.6-1. In recognition of the area's beauty and importance for wildlife, the State of California designated for conservation vast natural areas adjacent to SR-94: The Rancho Jamul Ecological Reserve ("RJER") and the Hollenbeck Canyon Wildlife Area ("HCWA") are protected for "management, maintenance and restoration of the biological diversity and ecosystem components currently and historically present within the RJER" and HCWA). DEIR 2.1-16 (RJER), 2.1-17 (HCWA). Furthermore, the residential areas in the vicinity of the project are quiet neighborhoods, featuring natural "open space," and rural amenities. DEIR 2.1-4 to 2.1-6. Yet the project is inconsistent with many of the regional and local plans designed to maintain this area's bucolic nature.

E22 The DEIR must "discuss any inconsistencies between the proposed project and applicable general plans and regional plans," to allow the lead agency to make an informed decision based on the project's actual impacts weighed against actual benefits. CEQA Guidelines §§ 15125(d), 15093. Here, the project is inconsistent with the Regional Transportation Plan's Healthy Environment Goal that the "transportation system should promote environmental sustainability . . . [and] should encourage growth *away from rural areas* and closer to existing and planned development." DEIR 2.1-11 (emphasis added). The DEIR admits planned future development is limited and that the project is located in the vicinity of predominantly rural residential uses and open space, yet it erroneously concludes that, with the exception of the Melody Road Alignment, the project would be consistent with this Regional Transportation Plan goal. DEIR 2.1-3, 2.1-7.

RESPONSES

E21 The Project does not conflict with surrounding land uses and is consistent with the applicable regional and local land use plans (see Final EIR Section 2.1.2.1 Consistency with State, Regional, and Local Plans and Programs). The commenter does not provide any examples of how the Project allegedly conflicts with such land uses and plans, it is impossible to respond to this comment. These issues are addressed in detail in Section 2.1, Land Use.

E22 As stated in Section 2.1, Land Use, the Proposed Project does not conflict with the Healthy Environment Goal. The Project neither opens an area previously closed to development nor proposes additional work opportunities or housing that might encourage population shifts. Rather, the Project analyzes focused improvements to intersections and potential access alignments identified as part of the already approved JIV gaming facility. As described in Section 2.1, the potential effects on the environment related to potential impacts to biological resources have been carefully detailed. Excluding Melody Road, which would result in a new road, other alternatives are located either wholly or primarily within existing road rights-of-way. The issue has been appropriately analyzed and no changes are required to the Final EIR.

COMMENTS

E23 Further, *none* of the alternatives would be consistent with the Healthy Environment Goal. Under CEQA, the DEIR must be revised to address these plan inconsistencies. CEQA Guidelines § 15125(d).

E24 Similarly, although the project is plainly inconsistent with the County General Plan's land use prescriptions for this rural area, the DEIR only admits inconsistencies between the Melody Road Access Alignment and the Jamul/Dulzura Subregional Plan Land Use and Conservation Goals. DEIR 2.1-20 to 2.1-23, 2.1-26 to 2.1-29. But other inconsistencies abound. For example, the Valle de Oro Community Plan directs that "[n]ew development will conserve natural resources and topography and will provide a pleasant, safe environment for present and future residents of Valle de Oro." DEIR 2.1-13. But the project does neither. Yet Caltrans fails to acknowledge this inconsistency, as well as the project's inconsistencies with the County's Open Space, Conservation, and Scenic Highway goals. Likewise, the project is inconsistent with the Jamul/Dulzura Subregional Plan which "encourag[es] development in such a manner as to retain the rural atmosphere of the community," as well as with its Land Use, Mobility, Conservation and Scenic Highway goals. DEIR 2.1-14.

E25

E26

E27 The DEIR admits that the "[r]ight-of-way expansion south of the JIV Tribal Lands encroaches onto the RJER." DEIR 2.1-11. "The Access Road Alignments would all require ROW from the RJER" and HCWA, yet the DEIR rationalizes this taking by relying on "compensatory mitigation . . . at a 3:1 ratio, with new, higher-quality land." DEIR 2.1-30. However, the DEIR does not mention where this "new, higher-quality land" will be, whether it will fragment or otherwise impact the RJER and HCWA and thereby harm wildlife, or what "higher-quality land" even means. *Id.*; 2.16-9 to 2.16-12 (mitigation measures for 3:1 compensation for land removed from RJER). These vague mitigation measures cannot make up for the project's immediate and direct destruction of preserved open space and its wildlife habitat.

B. TRAFFIC

E28 As discussed in detail above, the DEIR's failure to provide an accurate and stable baseline that consists of traffic patterns as they existed in August 2013 – when the NOP was published – significantly downplays the project's traffic impacts. DEIR 2.4-3 to 2.4-4, 2.4-11 to 2.4-13. By comparing the project to predicted future traffic conditions – which are much more congested than current conditions – the DEIR misleads the public and decisionmakers into underestimating the project's impacts and possibly ignoring potential mitigations or alternatives that might lessen those impacts.

E29 The DEIR admits that under the Horizon Year (2035) analysis the proposed improvements at the SR-94/Jamacha Boulevard intersection "would increase the overall delay at this intersection and would result in an adverse cumulative contribution to traffic operations at the intersection when compared to the No Build scenario." DEIR 2.4-56 to 2.4-57. It attempts to justify this adverse impact by claiming that "when evaluating the proposed roadway

RESPONSES

E23 Please see RTC E22.

E24 The Project is not "plainly inconsistent" with land use plans in this area. The consistency analysis is provided within the Final EIR at Section 2.1.2.1 Consistency with State, Regional, and Local Plans and Programs. With regard to Valle de Oro, potential impacts to natural resources and topography within the Valle de Oro Community Plan area would be associated with two focused intersection improvements—SR-94 and Jamacha Boulevard and SR-94 and Jamacha Road. At SR-94 and Jamacha Boulevard, improvements would consist of restriping and signal improvements. No grading would be required, and improvements would be located wholly within existing State Highway right-of-way. At SR-94 and Jamacha Road, no changes to existing right-of-way would occur on the northwest, northeast or southeast quadrants of this developed intersection. On the southwest quadrant, linear improvements would occur along existing roadway for approximately 600 feet, north of existing and proposed open space and industrial uses. Grading (into a previously manufactured slope, as described on Draft EIR page 2.1-20) would be balanced on site and a retaining wall would minimize necessary cut. The changes to the existing visual character and quality of this intersection were identified as less than significant. Furthermore, the addition of a southbound right turn lane would improve traffic movement at the latter intersection, which would support the stated goal of "creating a pleasant, safe environment for present and future residents of Valle de Oro" as stated in that plan.

E25 The Final EIR does not "ignore inconsistencies with the County's Open Space, Conservation and Scenic Highway goals." As stated is the Draft EIR on page 2.1.12: "the General Plan states that Community Plans, such as the Valle de Oro Community Plan and Jamul/Dulzura Subregional Plan… define Goals & Policies to provide more precise guidance regarding the character, land uses, and densities." Because the more specific community/subregional plans provide the greater guidance, those plans also provided the basis for land use analysis in the Final EIR. The goals are addressed in the land use discussions for each of these categories of concern (open space, conservation and scenic highways) in the Draft EIR on pages 2.1.12 through 2.1-14, 2.1-20 through 2.1-23, and 2.1-26 through 2.1-29. Where relevant, the reader also was clearly directed to cross-referenced discussions in the Draft EIR at Sections 2.1.2.1 and 2.1.2.2.

COMMENTS	RESPONSES
	E26 The relevant Jamul/Dulzura Subregional Plan Goals identified in the Final EIR (Section 2.1.2) included: • Land Use: Development of the land in such a manner as to retain the rural densities and land uses of the community. • Mobility: Develop a transportation system that provides for safe, efficient travel throughout this rural community and preserves the beauty, quality, and rural character of the Jamul/ Dulzura Subregional Planning area. Automobile and non-motorized modes of travel are accommodated within the planning area. A local road system that is safe and efficient. • Conservation: Environmental resources in the Jamul/Dulzura area that are carefully managed to maintain them for future needs. • Scenic Highways: The designation of a scenic highway system that provides attractive and scenic travel routes within the Jamul Subregional Area. The Project would be consistent or would not significantly conflict with each of the policies specified above; refer to the response to D25. The Project would also comply (prior to or post focused mitigation) with other related plans, such as the Regional Transportation Plan/Regional Transportation Improvement Program, the Multiple Species Conservation Plan (MSCP), and the land management plans for the Hollenbeck Canyon Wildlife Area and Rancho Jamul Ecological Reserve, as detailed int he Draft EIR on pages 2.1-19 through 2.1-31.
	E27 The permanent impacts to RJER lands would total approximately 1.0 acre of the approximately 5,700-acre preserve (or less than 0.0002 of the preserve). The majority of that small percentage of impact (associated with the Alternative 2, Option 1 Full Footprint) would be to "upland non-native grasses with limited habitat value for wildlife." The process for MSCP boundary adjustment includes focused review of impacted land, and mitigation land, as well as the contribution of the replaced land's value to the Pre-Approved Mitigation Area (PAMA). This area of the County is in an approved plan, which also means that the Project would receive oversight from the signatory wildlife resource agencies. All of this would have to be resolved prior to the County granting a grading permit for the Project in this area.

COMMENTS	RESPONSES
	E28 The traffic study included in the Final EIR provides an assessment of three different traffic conditions: Existing Conditions, Near Term Conditions, and Horizon Year Conditions. Each of these traffic conditions were evaluated in a manner consistent with Caltrans' Guide for the Preparation of Traffic Impact Studies, dated December 2002. The evaluation of these three traffic conditions provides the necessary comparison needed to evaluate whether the Proposed Project would cause adverse traffic effects related impact to the study area intersections. The existing conditions analysis provides an evaluation of existing traffic conditions as it uses actual vehicular count data collected in the field. See also RTC E8.
	E29 Although one peak period during the day at the SR-94/Jamacha Boulevard intersection would see a delay increase of 27.1 seconds under cumulative conditions, the Project area corridor would see an overall improvement of 119.2 seconds (approximately 2 minutes) with improvements in place. The determination of significance of traffic improvements was made by the SR-94 Improvement Project Development Team (PDT), who considered the almost 2 minutes of improvement within the Project corridor to be a less-than-significant impact.

COMMENTS

improvements within [the] study area overall, traffic operations are improved compared to the No Build scenario[, and therefore] would result in a less-than-significant impact." DEIR 2.4-61. However, that conclusion does not follow from the statements made directly above. CEQA does not allow an agency to gloss over significant negative impacts simply because other impacts will be lessened. The DEIR must address this impact and propose alternatives and mitigation measures to minimize its significance.

E30 As noted above, the project description makes no mention of the parking lot east of SR-94. However, if used during operation of the casino, Caltrans must consider how to safely transport pedestrians across the highway and the impact these pedestrians will have on traffic, as well as other impacts on scenery, wildlife, surface runoff and growth induction.

C. WATER SUPPLY

E31 In addition to the DEIR's pervasive informational failures already identified, the DEIR's discussion of the water supply and water quality impacts of all of the potential SR-94 Improvement Alternatives is incomplete. The DEIR is silent as to the quantity and source of any water required to construct any of the action alternatives. Yet all alternatives contemplate grading (DEIR 2.8-4.) and the use of watering trucks for dust suppression, at a worst-case scenario of twice a day through a multi-month construction period. DEIR 2.12-16, 5-36. Both grading and dust suppression activities require water, often in significant quantities. Caltrans' failure to address these impacts in the DEIR precludes informed decisionmaking regarding the project's potential impacts to the local water supply.

D. BIOLOGICAL RESOURCES

E32 The DEIR's discussion of the project's impacts to biological resources is plagued by the same failures that make the remaining impact discussions inadequate. DEIR 2.16-4 to 2.16-9, 2.17-4 to 2.17-6, 2.18-2 to 2.18-3, 2.19-3 to 2.19-6, 2.20-4 to 2.20-5, 2.21-1. The analysis is incomplete and misleads the public and decisionmakers. For example, by failing to compare the project's impacts to an appropriate baseline and by lumping all of the alternatives' impacts together rather than comparing them, the DEIR downplays the project's significant impacts to biological resources, thereby preventing a full and fair discussion as required by CEQA. Pub.Res.Code § 21002; CEQA Guidelines § 15121; *Vineyard*, 40 Cal.4th at 428. For example, the DEIR's entire discussion of impacts caused by invasive species is two-sentences long: "Construction of Alternatives 1-3: Build Alternatives has the potential to introduce or encourage the spread of invasive species via construction equipment that can transport weed seeds or the use of erosion control products containing weed seed. However, the use of Caltrans Standard Measures . . . ensures the impact is less-than-significant." DEIR 2.21-1. This conclusory assertion is unsupported by any analysis, making it impossible for the reader or decisionmaker to understand and evaluate the project's true impacts. This violates CEQA. "The EIR must contain facts and analysis, not just the bare conclusions of a public agency." *Kings County Farm Bureau v. City of Hanford* ("*Kings County*") (1980) 221 Cal.App.3d 692, 736.

RESPONSES

E30 The parking lot east of SR-94, which is being currently being used for temporary parking for the construction of the JIV Gaming Project, is not part of the Project evaluated in the Final EIR. Please see RTC E5.

E31 The use of watering trucks during construction operations is a standard temporary operating procedure to minimize dust emissions (Caltrans Standard Specification Section 17-Watering). The use of watering trucks during temporary construction activities does not rise to the level of significant water use.

E32 The commenter is incorrect in stating that all of the impacts of the five Project alternatives were lumped together for the impact analysis. The DEIR clearly differentiates each alternative's baseline conditions and each alternative's impact upon biological resources. This is best exemplified in the DEIR's analysis of five different Project alternatives, one of which (Alternative 2, Option 3) was designed specifically as the environmentally superior alternative (i.e., having the smallest development footprint and the least amount of environmental impacts).

The Natural Environment Study (NES) prepared for this Project (Natural Investigations Co. 2014) is incorporated by reference in the Final EIR and thoroughly documented the baseline conditions. Over the past ten years, biologists have performed numerous habitat mappings, formal wetland delineations, botanical surveys, wildlife surveys, and protocol surveys for endangered butterfly and bird species.

The invasive species that exist within the Project areas are well documented in the NESvia habitat mapping and botanical studies. Invasive species already dominate much of the vegetation in the Project areas (i.e. the "baseline condition"). The incremental contribution of additional invasive species via construction equipment is not likely to change a landscape already dominated by invasive species. Nevertheless, mitigation measures were identified to stop the transport of invasive species via construction equipment (see Final EIR Section 2.21).

COMMENTS

E33 Even in the limited instances where the DEIR discusses the alternatives individually, the analysis is severely lacking in evidentiary support. For example, the DEIR admits that the Melody Road Access Alignment "would cause habitat fragmentation and restrict wildlife movement and reduce the utility of Willow Creek as a wildlife corridor," which would be significant and unavoidable. DEIR 2.16-9. But this bare conclusion is all the DEIR says on the matter. There is no discussion of potential species impacted, or ways to lessen the impacts. *Id.* This does not suffice under CEQA. *Kings County*, 221 Cal.App.3d at 736.

E. AIR QUALITY

E34 As discussed above, the primary questions to be addressed in an EIR are whether a project may have significant environmental impacts, and if so, whether those potentially significant impacts can be lessened. Thus, CEQA requires Caltrans to determine whether project construction has a significant air quality impact. This determination is required regardless whether the Federal Highway Administration's ("FHWA's") regulations for evaluating conformity with the Federal Clean Air Act and the State Implementation Plan ("SIP") require Caltrans to analyze the air quality impacts of construction projects under 5 years in duration. CEQA also requires Caltrans to address the broader question of whether the Project as a whole has a significant impact on air quality, and in doing so to consider the different significance thresholds employed both by Caltrans and the County of San Diego (Chapter 2.12 and Chapter 5.11 respectively). Caltrans' failure to do so frustrates informed decisionmaking. The

E35 significance of an environmental impact does not change based solely on the entity making an approval. As discussed above, Caltrans must address all of the project's potentially significant impacts.

E36 Caltrans should have considered and addressed the project's emissions during construction, including but not limited to (1) emissions caused by alterations to traffic flow that increase vehicle idling time during project construction, (2) emissions, including volatile organic compounds ("VOC") and particulate matter, from construction vehicles, equipment, and from workers traveling to and from the construction site, (3) emissions, including VOCs, from other aspects of project construction including paving, and (4) fugitive dust emissions. In considering whether these impacts may be significant, Caltrans should have considered and consulted relevant and applicable air quality standards for construction projects, including applicable rules of the San Diego Air Pollution Control District ("SDAPCD").

E37 Caltrans must address whether project construction will conform to SDAPCD Rules. Applicable rules include Rule 50 – addressing visible emissions – and Rule 55, regulating fugitive dust at construction and demolition sites, including construction sites operated by state

RESPONSES

E33 The NES analyzed impacts to special-status species, wildlife corridors, and wildlife movement in detail. For brevity, the Final EIR shortens these discussions. Nevertheless, Final EIR Sections 2.18, 2.19, and 2.20 specifically discuss potential impacts to plant species, animal species, and threatened and endangered species, respectively. These Final EIR Sections also identify mitigation measures to lessen the impacts. Further, these Final EIR Sections also identify impacts which cannot be mitigated and, in those instances, the impacts were disclosed as significant and unavoidable.

E34 CEQA does not dictate the thresholds of significance that Caltrans must employ. The setting of thresholds and determination of significance is at the discretion of the lead agency. In the case of temporary construction emissions, Caltrans, District 11, utilizes the FHWA methodology for determining the significance of construction emissions. In doing so, Caltrans determined that construction emission would be less than significant (see Final EIR Section 2.12.3 Environmental Consequences).

E35 Please see RTC E17.

E36 As stated in the Air Quality analysis, the construction contractor must comply with Caltrans Standard Specifications Section 14-9.01, which require the contractor to comply with air pollution control rules, regulations, ordinances, and statutes that apply to work performed under the Contract including Government Code § 11017 and Public Contract Code § 10231.

E37 CEQA does not mandate the use of particular thresholds of significance. The setting of thresholds and determination of significance is at the discretion of the lead agency. In the case of temporary construction emissions, Caltrans, District 11, utilizes the FHWA methodology for determining significance of construction emissions. Caltrans determined that the emissions from construction of the Project would be less than significant.

COMMENTS

agencies. Because the DEIR fails to address the Project's potentially significant air quality impacts, Caltrans must correct and recirculate the DEIR.

F. EMERGENCY SERVICES

E38 Adding to the confusion caused by the DEIR's failure to identify and describe the proposed project and to present a consistent and accurate baseline, the DEIR also fails to support its cryptic assertions regarding the project's impacts to emergency services. DEIR 2.5-3 to 2.5-4. The DEIR erroneously declares that the TMP would "ensure[] that emergency services would not be significantly delayed or interrupted" during construction. DEIR 2.5-4. However, it presents no analysis or data to support this claim or explanation of what measures will be implemented to provide such an assurance. *Id.* Similarly, while the DEIR admits that the SR-94/Jamacha Blvd. Intersection emergency response time is expected to increase during construction, it fails to account for the permanent increase in response time even after construction is complete. *Id.* Even with ample room for cars to pull over to the shoulder to allow emergency vehicles to pass, the increased traffic at the intersection may permanently increase response time. The DEIR fails to disclose this impact and consider potential alternatives and mitigation measures that would reduce this impact.

G. NOISE

E39 Like many of the DEIR's impact discussions, the analysis of noise impacts is incomplete, oversimplified, and stymied by the lack of a proposed project and baseline. DEIR 2.14-1 to 2.14-17. Given the lack of a baseline and the DEIR's tendency to compare the project to conditions *after* the casino is operational rather than at the time the NOP was published, it is unclear what basis of comparison is used in the noise analysis – conditions as of August 2013, or conditions once the casino is operational. DEIR 2.14-6 to 2.14-7, 2.14-9. Without knowing what alternatives the DEIR is comparing with the project, the significance of those alternatives' impacts and effectiveness of their mitigation measures cannot be determined. *EPIC*, 131 Cal.App.3d at 354.

H. FINDINGS OF SIGNIFICANCE

E40 Chapter four of the DEIR fails as an informational document. DEIR 4-1 to 4-4. This "Mandatory CEQA Sections" discussion provides three vague charts that supposedly inform the reader and decisionmakers about which impacts will be less than significant, or less than significant after mitigations, and which will have significant and unavoidable impacts. *Id.* However, one- and two-word impact descriptions with little information identifying the alternative to which the impact applies, or if it applies to the non-access road intersections at all, do not suffice under CEQA. CEQA Guidelines §§ 15126, 15126.2, 15126.4, 15126.6. Furthermore, these charts offer no indication as to what mitigation measures will be applied to alleviate which impacts, nor how effective those mitigations will be. DEIR 4-1 to 4-4. The DEIR's failure as an informational document requires its wholesale revision and recirculation for

RESPONSES

E38 As part of the implementation of the Proposed Project, a Transportation Management Plan (TMP) would be prepared according to Caltrans' Deputy Directive 60-R2 (DD-60-R2). One of the main goals of a TMP is to maintain emergency vehicle access. The approval of the TMP is needed prior to the start of construction of any of the improvements evaluated in the Final EIR.

The improvements included in the Final EIR would provide standard 8- foot shoulders within the Project footprint, as well as additional lanes that would provide more space for vehicles to move to the side. In addition, emergency vehicle preemption equipment would be installed at all signalized intersections within the Project footprint. These improvements would ensure that emergency vehicles could respond quickly along SR-94.

E39 As required by CEQA, the analysis is correctly based on change from the existing condition to the future conditions. As shown in Table 2.14-2, the Project assesses the noise impacts from the future traffic on SR-94 compared to the existing condition. Based on Caltrans published noise protocol, no traffic noise impacts requiring noise abatement were identified. The alternatives analyzed in the Final EIR included different alignment of the highway and access configurations for the Jamul reservation. Please note that the JIV gaming facility was approved under a separate environmental study and is not part of the SR-94 Project. The SR-94 Project is intended to address future traffic issues from traffic volumes projected to occur on SR-94 in the vicinity of the Gaming Development Project. Please see RTC E8.

E40 The information in Tables 4-1 through 4-3 of Chapter 4 is not vague, and in addition to summarizing the applicable issues and impacts, the information in those tables specifically references the sections of the Final EIR containing the more extensive discussion, analysis and proposed mitigation of all of the potential impacts identified throughout the Final EIR as well as the Project alternative associated with each potential impact. The tables are meant solely to summarize the extensive information and analysis presented throughout the Final EIR and makes it easier for the public and decision makers to hone in on any specific issue or impact area and then be referred to the Final EIR Section where those issues and impacts are discussed in detail.

COMMENTS

DEIR's failure as an informational document requires its wholesale revision and recirculation for public review.

VI. CUMULATIVE IMPACTS

E41 The DEIR's cumulative impacts analysis is plagued by all of the same deficiencies as the other impact analysis sections discussed above. DEIR 3-6 to 3-31. By lumping all of the alternatives together as if all their impacts are identical, and failing to identify, let alone analyze, the proposed project, the DEIR fails to inform decisionmakers and the public of the project's impacts and those of its alternatives. This violates CEQA. Guidelines §§ 15121, 15130. For the same reason, the DEIR fails to present any information on how the cumulative impacts caused by the project could be lessened. *Id.*

VII. CONCLUSION

The DEIR fails to meet CEQA's requirements for all of the reasons discussed above. Accordingly, the DEIR must be revised to correct these deficiencies so that the project's impacts and a reasonable range of alternatives and appropriate mitigation measures can be adequately analyzed before a decision whether to approve the project is made.

Respectfully submitted,

Stephan C. Volker
Attorney for Jamulians Against the Casino

SCV:taf

RESPONSES

E41 The cumulative analysis provided in Chapter 3 separates the intersection improvements from the access road improvements (within separate headings, where appropriate), and further distinguishes between alternatives where there is a difference in cumulative contribution. It is true that the findings are generally the same, but that is because the footprint effects are relatively small and focused, the associated impacts are often less than significant, and/or the overall Project impacts would be mitigated to less-than-significant levels. All of this results in the remaining contribution to cumulative impacts resulting from these very focused improvements as constituting less than considerable contributions to the overall cumulative condition. Please see RTC E2, E3, E14, E15 and E18.

COMMENTS

Law Offices
Webb & Carey
A Professional Corporation
402 West Broadway, Suite 1230
San Diego, California 92101
TEL(619) 236-1650
FAX(619) 236-1283
pwebb@webbcarey.com

August 21, 2015

CalTrans
Public Information Office
4050 Taylor Street
San Diego, CA 92110
619-688-6670
Ct.public.Information.D11@dot.ca.gov

Re: July 2015 Draft EIR for SR-94 Improvement Project

Dear CalTrans:

The law abiding faithful believe that unrepentant grave robbers go to hell, after they go to jail for a very long time. Grave robbing is a felony.

Native Americans believe, when the dead are disturbed, their spirits wander and bring evil to those who disturbed their graves.

Since Jamul was part of Spain, and then Mexico, more than a hundred of our clients, Walter Rosales and Karen Toggery's deceased ancestors' human remains and funerary objects have been inhumed, interred, and dispersed in burial sites below, on, and above the ground at the more than 7 acre Indian cemetery in Jamul.

The sepulture of the dead is, in all civilized nations and many barbarous ones, consecrated ground.

F1 Yet, CalTrans has conspired with the Jamul Indian Village (JIV) and Penn National to dig up Walter Rosales and Karen Toggery's families' remains and unceremoniously dump them on a CalTrans construction site for the SR 905-125-11 interchange at the border, in violation of the Native American Graves Protection Act (NAGPRA), the Indian Reorganization Act, the California Compact, California Environmental Quality Act (CEQA), the state and federal Constitutions, and California common law.

F2 CalTrans has acted in concert with Penn National and the JIV to facilitate, aid and abet the illegal construction of a casino on the Indian cemetery in Jamul, in exchange for the quid pro quo of millions of dollars of fill dirt that was provided to, and accepted by, CalTrans essentially for free. All without even the semblance of complying with the California Environmental Quality Act (CEQA).

RESPONSES

F1 The gaming facility currently under construction is not the Proposed Project. Please see RTC B1.

The Proposed Project (the SR-94 Improvements) that is evaluated in the FEIR is a series of roadway improvement measures designed to improve area traffic conditions compared to what would otherwise exist (see FEIR Section 1.2.1). These measures are being constructed primarily in Caltrans right-of-way where no cultural remains exist. The Proposed Project would not be conducted on JIV's reservation. In accordance with CEQA, the FEIR duly evaluates the Proposed Project's potential impact on unknown cultural resources (see FEIR Section 2.7).

F2 Please see RTC F1.

COMMENTS	RESPONSES

CalTrans
August 21, 2015
Page 2

F3 CalTrans and its willing accomplices at JIV and Penn National have committed some of the most heinous and grisly of crimes in the headlong rush to illegally build a casino on the U.S. government's portion of the Jamul Indian cemetery, before the law can be enforced. This felonious desecration is a deliberate violation of NAGPRA, and the Cal. Pub Resources, Health & Safety and Penal Codes. CalTrans has been on notice of our clients' rights since 2007.

F3 Please see RTC F1.

CalTrans has bee on notice of our clients' rights since 2008. More than 20 eyewitnesses have testified to this desecration by CalTrans. In fact, the Jamul Indian Village (JIV) principals have admitted to the desecration under oath. These interments are further corroborated by the Cal. Dept. Of Health Permits for Disposition of Human Remains, San Diego and Riverside County Death Certificates, and the San Diego Rural Fire Prot. Dist. Daily Logs of the cremated funerary objects.

F4 The United States Supreme Court finds that such desecration of human remains, whether dragged through the streets of Fallujah or in dump trucks on Otay Mesa, is outrageous, cruel, unjust, and despicable conduct in conscious disregard of the rights of the surviving family members. See, *National Archives v. Favish*, 541 U.S. 157 (2004).

F4 Please see RTC F1.

What is truly outrageous here, is the extent to which CalTrans and its willing accomplices at JIV and Penn National are willing to prevaricate concerning their desecration of Rosales and Toggery's families' remains for "profit," in direct violation of NAGPRA and its purposes to ensure "dignity and respect" and to combat "cultural insensitivity" for the traditional Native American religious burial practices for those who believe "that the spirits of their ancestors w[ill] not rest" until their remains are "returned to their homeland." S. Rep. No. 101-473, 4-6 (1990), quoting H.R. Rep. No. 101-877, at 10 and 13 (1990).

F5 CalTrans has been sued by the Jamul Action Committee (JAC) and the County of San Diego due in part to this desecration, which lawsuit is currently pending before 3rd District Court of Appeal in Sacramento. Our individual clients, Rosales and Toggery, have separately sued CalTrans for the felonious desecration of their families' human remains, which lawsuit is pending before the 4th District Court of Appeal in San Diego. They have also sued the BIA, JIV and Penn National officials for this felonious desecration of their families in the Eastern District of California in Sacramento. See the attached copy of their complaint therein.

F5 Please see RTC F1.

F6 The July 2015 Draft Environmental Impact Report (EIR) for the SR 94 Improvement Project is nothing but a put up job, mostly copied from the JIV's unqualified and unsubstantiated Environmental Evaluations dating back to 2003, all of which continue to fail to address the felonious desecration of these Native American graves, and the illegal segmenting of CalTrans complicit aiding and abetting JIV's illegal project without mitigating the unmitigable environmental impacts of the entirety of the construction and operation of the illegal casino project.

F6 Please see RTC F1. Construction and operation of the casino is not within the scope of the SR-94 Improvement Project (see Final EIR Section 1.1 *History of the JIV Gaming Development Project*).

COMMENTS

Any agency, like CalTrans must review the entire activity as a whole, rather than trivialize its obvious effects by segmenting it into smaller, sequential parts. *Association for a Cleaner Environment v. Yosemite Community College District* ("*ACE*") (2004) 116 Cal.App.4th 629, 638; Guidelines §§ 15004(c), 15378(a), (c), (d). All of which the 3rd District Court of Appeal has already found constitutes illegal segmentation of the project by CalTrans in violation of CEQA.

It is "improper for an agency to divide a project into separate parts to avoid CEQA review." *California Farm Bureau Federation v. California Wildlife Conservation Board* (2006) 143 Cal.App.4th 173, 191. This requirement ensures "that environmental considerations [do] not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." *Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 592.

Agencies must address in their CEQA review the environmental impacts of a "reasonably foreseeable consequence of the initial project" such as the off-site traffic impacts of the casino's operation that will foreseeably result from its construction. *Laurel Heights Improvement Association v. Regents of University of California* ("*Laurel Heights*") (1988) 47 Cal.3d 376, 393-399. "It is clear that the requirements of CEQA cannot be avoided by chopping up proposed projects into bite-sized pieces which, when taken individually, may have no significant adverse effect on the environment." *ACE*, 116 Cal.App.4th at 638.

F7

The case law under CEQA confirms that Caltrans' segmentation of its CEQA review is unlawful. Two leading cases – *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora*, (2007) 155 Cal.App.4th 1214, and *ACE*, 116 Cal.App.4th at 638 – are on point and controlling. In *Tuolumne County*, the court determined that roadway improvements and a home improvement store were one project. To inform its analysis, the *Tuolumne County* Court examined the overall project objectives in context, and determined that the successful operation of the store required *both* projects. 155 Cal.App.4th at 1226-1227. Here, as in *Tuolumne County*, it is impossible to separate the two activities at issue, because one cannot divorce the casino's construction from its operation.

The court's ruling in *ACE* is similarly on all fours here. There, a community college district approved the closure of a shooting range, and claimed that either CEQA did not apply at all to this decision, or alternatively, that its approval was exempt from CEQA review. 116 Cal.App.4th at 638. There the court found the "whole of the action" included *both* the closure and removal of the shooting range, and related foreseeable actions such as lead abatement efforts, and the relocation of the shooting activities to another range. *Id.* at 639. The district's "myopic analysis" and "attempt to segregate" environmentally damaging activities from the project was "not convincing;" and the Court found that "whole of [the district's] action does have a potential for direct or indirect physical change in the environment" 116 Cal.App.4th 639. For this reason,

RESPONSES

F7 The JIV gaming facility is not part of the SR-94 Improvement Project, nor is it a reasonably foreseeable consequence of the SR-94 Improvement Project, which consists of a series of roadway improvement measures designed to mitigate increased traffic primarily attributable to the gaming facility. That gaming facility has already been approved and is currently under construction. The SR-94 Improvement Project is a consequence of the gaming facility in that its primary purpose is to implement traffic mitigation measures identified in the environmental review process for the gaming facility.

COMMENTS	RESPONSES
CalTrans August 21, 2015 Page 4	
and because no CEQA exemption could apply, the district was required to prepare an initial CEQA compliant study. *Id.* at 640, 642.	
F8 Moreover, twice the 3rd District Court of Appeal has addressed CEQA's application to the off-site impacts of tribal casinos, and twice it has held that CEQA applies. First, the Court held in *County of Amador v. City of Plymouth* ("*County of Amador*") (2007) 149 Cal.App.4th 1089, under Government Code section 12012.25(g) and other similar compact ratifications, that "the *off*-reservation impacts of a casino project *would* be subject to CEQA. That would certainly include, as here, any impacts that require the approval of the City." *Id.* at 1102 (emphasis added). Second, the Court held in *Voices for Rural Living v. El Dorado Irrigation District*, (2012) 209 Cal.App.4th at 1108-1114, that the off-site effects of a tribal casino's use of water were likewise subject to CEQA. In *Voices for Rural Living*, the irrigation district's approval of a 3-inch water meter enabled the construction and operation of a casino with significant water usage and related impacts. 209 Cal.App.4th at 1110-1114. The Court held that the change in water consumption presented a reasonable possibility of a significant effect on the environment. *Id.*	F8 Please see RTC B1 and F7. The SR-94 Improvement Project described in Section 1.0 of the Final EIR is the entirety of the Project for Caltrans. This Project is currently undergoing CEQA review, and these comments/responses are part of that CEQA process.
Two California governors from each major party, Davis and Schwarzenegger, found this project's significant degradation of the environment and desecration of cultural resources unmitigable, and not in compliance with the Gaming Compact Section10.8.3.	
The Compact prohibits the construction of a gaming facility on Indian lands by the JIV after January 1, 2005 "unless and until an agreement to amend this Section 10.8 has been concluded between the Tribe and the State."	
F9 Section 10.8.3(b) provides: "At any time after January 1, 2003, but not later than March 1, 2003, the State may request negotiations for an amendment to this Section 10.8 on the ground that, as it presently reads, the Section has proven inadequate to protect the off-Reservation environment."	F9 Please see RTC B1.
On February 28, 2003, the State made such a request to JIV, and other tribal entities, to amend Section 10.8.3. JIV failed to negotiate an amendment to Section 10.8.	
Section 10.8.3(c) of the Compact prohibited casino construction after January 1, 2005 "unless and until an agreement to amend this Section 10.8.3 has been concluded between the Tribe and the State." Without such an amendment, the JIV is required to "**immediately cease construction**" of the casino "unless and until agreement to amend this Section 10.8 has been concluded."	
F10 Moreover, not only does the Draft EIR fail to even mention the desecration of Rosales and Toggery's families' remains, it falsely adopts the JIV's blatant and deliberate misrepresentations as to its status. JIV is nothing but a half-blood Indian community that does not qualify for Indian gambling.	F10 The points being made by the comment are directed at the Tribe, JIV, and the JIV gaming facility, all of which are outside the scope of the SR-94 Improvement Project being evaluated in the Final EIR.

COMMENTS	RESPONSES
CalTrans August 21, 2015 Page 5	
F11 Contrary to the falsehoods published by CalTrans in its Frequently Asked Questions, the JIV casino project is not located on Indian land held in trust by the United States government for the benefit of the tribe. In fact, the land was donated in 1978 by the Daley families to the United States for the express benefit of individual half-blood Indian families that were living on the cemetery. The Daley families specifically agreed to this form of conveyance in order to provide a place protected by the United States as a trustee to protect the living and the dead against all forms of alienation, trespass, desecration, mutilation, disinterment, and any other infringement. This conveyance constitutes a donation of property for the benefit of individual Indians, pursuant to 25 U.S.C. 451, and has never been transferred to the JIV.	F11 Please see RTC F10
F12 The JIV has no land held in trust by the U.S. government. Nor can it have any land held in trust, since it was not under federal jurisdiction in 1934, by order of the Unites States Supreme Court in *Carcieri v. Salazar* (2009).	F12 Please see RTC F10
F13 In fact, the JIV is building on 4 acres of the more than 7 acre Jamul Indian cemetery that has been sanctified as a place of worship and a religious ceremonial site since the mid-1800's. The Indian cemetery has always been private property. A portion of the cemetery was gifted to the United States for the beneficial ownership of the individual half-blood Indian families living there in 1978. California retains concurrent jurisdiction over all of the more than 7 acre Jamul Indian cemetery, and two of its governors have expressly found that gambling on the government's portion of the cemetery would be detrimental to the surrounding community.	F13 Please see RTC F10
F14 Contrary to CalTrans' blatant false statements in its Frequently Asked Questions, the JIV has no right, permit or authorization to desecrate Rosales and Toggery's families' remains to build a casino on the government's portion of the Indian cemetery. Such construction is a deliberate violation of the Indian Gaming Regulatory Act, the Indian Reorganization Act, the purported Gaming Compact with California, NAGPRA, CEQA, the state and federal Constitutions, and California common law.	F14 Please see RTC F10 and B1.
F15 JIV was not recognized under federal jurisdiction in 1934. JIV has never acquired, nor lawfully exercised, governmental power over the government's portion of the Jamul Indian cemetery on which it is illegally building a casino. In fact, the JIV has never been recognized as a tribe under the Indian Reorganization Act. It is nothing but a half-blood Indian community, which is not a federally recognized tribe, and has no inherent sovereignty. In fact, the JIV voluntarily and deliberately elected over 30 years ago not to become recognized, so that they could immediately obtain federal monetary benefits without exhausting their administrative remedies.	F15 Please see RTC F10 and B1.
F16 The listing of a half-blood Indian community in the Federal Register does not create, nor recognize, the JIV as a tribe. Similarly, the state compact does not create, nor recognize, the JIV	F16 Please see RTC F10 and B1.

COMMENTS

F16 cont.

as an IRA tribe. Nor does it allow the JIV to exercise governmental power over any portion of the Jamul Indian cemetery. In fact, as noted above, the Compact requires that construction be enjoined until the Compact is amended.

Because the IRA bars transfer of the government's portion of the Indian cemetery to the JIV, the JIV has never lawfully exercised governmental power over that parcel. Hence, the Individual half-blood's beneficial ownership of their families' final resting place was never transferred to the JIV, never taken into trust for the JIV, and the JIV has never exercised governmental power over that cemetery property. The U.S. has never transferred the beneficial ownership of the cemetery property from the individual Indians to the half-blood community.

Thus, the JIV has no right, permit or authorization to build a casino on the portion of the Indian cemetery beneficially owned by the individual half-blood Indians, including Rosales and Toggery, because no grant deed ever transferred governmental control over the cemetery property to JIV.

F17

Moreover, the JIV has no standing as a required or indispensable party in any of the pending lawsuits to enjoin construction, because it has failed to exhaust its administrative remedies and is not a recognized IRA tribe. The JIV failed to petition for recognition as an IRA tribe. The JIV has never petitioned for proclamation of a reservation, and no reservation has ever been proclaimed for the JIV. In fact, since the JIV failed to exhaust its administrative remedies, it has no standing in any court to seek a determination as to whether it qualifies to be recognized as an IRA Tribe.

F18

Therefore, the deliberately false CalTrans Draft EIR does not comply with the California Environmental Quality Act (CEQA), and the SR 94 Improvement Project must be enjoined until CalTrans complies with CEQA. See, the attached copy of Rosales and Toggery's Complaint in the Eastern District of California.

As the faithful believe, grave robbers and those acting in concert with them, will surely go to hell, if they don't repatriate the dead and tear down that steel. But until then, the law should be enforced, and the continuing desecration of Rosales and Toggery's families' remains must be stopped.

Very truly yours,

Patrick D. Webb
WEBB & CAREY

RESPONSES

F17 Please see RTC F10

F18 This comment does not raise specific environmental issues concerning the Final EIR. The comment is noted and forwarded to the decision maker for consideration.

COMMENTS	RESPONSES

Patrick D. Webb, Esq. State Bar No. 82857
WEBB & CAREY
402 West Broadway Ste 1230
San Diego CA 92101
Tel 619-236-1650
Fax 619-236-1283

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

WALTER ROSALES AND KAREN TOGGERY, ESTATE OF HELEN CUERRO, ESTATE OF WALTER ROSALES' UNNAMED BROTHER, ESTATE OF DEAN ROSALES, ESTATE OF MARIE TOGGERY, ESTATE OF MATTHEW TOGGERY, APRIL LOUISE PALMER, and ELISA WELMAS Plaintiffs, v. AMY DUTSCHKE, Regional Director, BIA; JOHN RYDZIK, Chief, Environmental Division, BIA; KENNY MEZA; CARLENE A. CHAMBERLAIN; ERICA M. PINTO; ROBERT W. MESA; RICHARD J. TELLOW; PENN NATIONAL GAMING INC.; SAN DIEGO GAMING VENTURES, LLC; and C.W. DRIVER, Defendants.	Civ. No. COMPLAINT DEMANDING TRIAL BY JURY

OUTLINE OF CLAIMS

OUTLINE OF CLAIMS i
NATURE OF ACTION 1
PARTIES 2
JURISDICTION AND VENUE 5
GENERAL ALLEGATIONS 6
I. Walter Rosales and Karen Toggery Own and Control Their Families Human Remains and Funerary Objects 6

COMMENTS	RESPONSES

Patrick D. Webb, Esq. State Bar No. 82857
WEBB & CAREY
402 West Broadway Ste 1230
San Diego CA 92101
Tel 619-236-1650
Fax 619-236-1283

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

WALTER ROSALES AND KAREN TOGGERY, ESTATE OF HELEN CUERRO, ESTATE OF WALTER ROSALES' UNNAMED BROTHER, ESTATE OF DEAN ROSALES, ESTATE OF MARIE TOGGERY, ESTATE OF MATTHEW TOGGERY, APRIL LOUISE ROSALES, and ELSA WELMAS Plaintiffs, v. AMY DUTSCHKE, Regional Director, BIA; JOHN RYDZIK, Chief, Environmental Division, BIA; KENNY MEZA; CHARLENE CHAMBERLAIN; ROBERT MESA; RICHARD TELLOW; PENN NATIONAL INC.; SAN DIEGO GAMING VILLAGE, LLC; and C.W. DRIVER INC., Defendants.	Civ. No. INDEX OF EXHIBITS TO COMPLAINT DEMANDING TRIAL BY JURY

INDEX OF EXHIBITS TO COMPLAINT

1. Exhibit A is a copy of the recorded September 26, 1912, J.D. Spreckel's Coronado Beach Company deed of a portion of the cemetery in Jamul, California, to the Roman Catholic Bishop of Monterey and Los Angeles, a corporate in sole of the State of California, "to be used for the purposes of an Indian graveyard and approach thereto," "to have and to hold the above granted and described premises unto the said Grantee, his successors and assigns forever for the purpose above specified," which was recorded in Book 361.

2. Exhibit B is a copy of the 1931 Map of Survey of Rancho Jamul, L.S. 430.

COMMENTS

DEERHORN VALLEY COMMUNITY ASSOCIATION

A 501©3 NONPROFIT ORGANIZATION
PO BOX 862, JAMUL, CA ~ EMAIL: DVCA@DEERHORNVALLEY.NET
DEERHORN VALLEY.NET ANTLER ALERTS
JOIN US ON FACEBOOK AND TWITTER

COMMENTS FROM THE DEERHORN VALLEY COMMUNITY ASSOCIATION ON DRAFT CALTRANS TRAFFIC EIR AUGUST 5, 2015

G1 The Deerhorn Valley Community Association has determined that the proposed mitigations for SR-94 to facilitate anticipated casino traffic (cars, buses, trucks) are far short of what is needed. Currently SR-94 is a substandard road with a high crash, injury, and fatality rate. These measures will result in an even more dangerous road for local residents and travelers alike.

G2 **1. NO ASSESSMENT OF SR-94 EAST OF CASINO CONSTRUCTION:**
Why was no analysis provided of the impacts of car, bus, and truck traffic to SR-94 east of casino construction? Please explain why this eastern section is NOT the preferred route between Pio Pico, Eastlake, Southbay, and Mexico and the proposed casino. Where is the analysis of current conditions vs. future conditions (with/without a casino)?

G3 **1-A. SHOULDERLESS ROAD SECTION:**
The stretch of SR-94 through Rancho Jamul Ecological Reserve is shoulderless and narrow—although it is one of the very few straight sections. There have been numerous head-on crashes here at high speeds. Although passing is now illegal, it is done frequently as it because this is one of the few sections of SR-94 with line-of-sight visibility of oncoming cars. How many additional crashes, injuries, and fatalities are anticipated? What other impacts to this section are anticipated by the additional thousands of vehicle trips including cars, buses, and service trucks?

G4 **1-B. BLOCKED ACCESS DURING EMERGENCIES:**
When crashes happen along the RJER section, SR-94 shuts down— typically in both directions due to the narrowness of the roadway and lack of shoulders. Many times emergency vehicles have been stuck in the traffic backup attempting to reach the site of an accident. They either wait for clearance, or reverse direction and use the long alternate to Otay Lakes Rd from Chula Vista/Eastlake. This adds as much as 45 minutes or more to the emergency response times. Here is just one example from CHP Incident Report where tow truck was unable to access "stuck in traffic."

00183 [8:06 AM Trfc Collision-No Inj SR94 E / CHECKPOINT WO SR94 E CHECKPOINT WO
11:07 AM 30 [65] LE PSOB L, SANDOVAL, CPZ LNS CLOSED [Shared]
11:06 AM29 [63] A108-029 CT IS STARTING TO LOAD UP THE DEBRIS TO GET RID OF IT. COMPANY CAN TAKE OVER [Shared]
11:01 AM 28 [61] 10-39 108-58 TO NOTIFY BOR DIV OF CLOSURE [Shared]
11:00 AM27 [60] 10-39 ENTAC [OFC CROSSLAND] [Shared]
10:48 AM26 [57] A108-029 UNK ETA AT THIS TIME [Shared]
9:33 AM 25 [46] *SIGN TRK 621 UNABLE TO GET THROUGH TO HANDLE THE WO CLOS AT 188 [Shared]
9:07 AM 24 [45] 108-R1 ROAD ONE THRU THE TRAFFIC [Shared]
9:04 AM 23 [44] 108-R1 LETTING ROAD ONE THRU [Shared]
9:01 AM 22 [43] CT 624-8 ENRT TO 94/OTAY LAKES RD [Shared]
8:59 AM 21 [41] A108-029 NEED TO GET ROAD ONE THRU . SEE IF VS OR CT CAN ASSIST GETTING ROAD ONE THRU THE TRAFFIC [Shared]
8:58 AM 20 [40] Notification [CHP] ROAD ONE EAST HONEY SPRINGS - 94 NOW STUCK IN TRAFFIC [Shared]
8:57 AM 19 [39] *CT 152 ADV SIGN TK 624-8 WILL ALSO BE RESPONDING [Shared]
8:53 AM 18 [38] *SIGN TRK 621-2 ENRT FROM SANTEE YD [Shared]
8:42 AM 17 [37] NO ANS AT TECATE SCALES, 1039 OTAY TO ADVS UNIT THAT WAS ASSIGNED AT TECATE [Shared]
8:40 AM 16 [36] *1039 CT 153 FOR SIGN TKS [Shared]
8:38 AM 15 [34] Notification [CHP] UPDATE TO SIGNALERT: EB AND WB 94 CLOSED DERW SH 188 AND OTAY LAKES [Shared]
8:36 AM 14 [33] 108-062 ADVS TECATE SCALES WB LNS CLOSED FM 188 TO OTAY LAKES [Shared]
8:36 AM 13 [32] Notification [CHP] CORRECTION (LINE 21) EB LANE BLOCKED, WB LANE IS OPEN [Shared]
8:30 AM 12 [28] 1039 ROAD 1, HAS SECOND TOW ENRT TO ASSIST [Shared]
8:25 AM 11 [21] Notification [CHP] - ISSUE SIGNALERT: SR94 EB W CHECKPOINTE / OF OTAY LAKES - EB AND WB LANES BLOCKED UNTIL FURTHER NOTICE [Shared]
8:24 AM 10 [20] BC SIGNALERT PICS CHANNELIS [Shared]
8:21 AM 9 [19] VIA FIRE DC [Shared]
8:23 AM 8 [18] 1026 CDF SD [Shared]
8:23 AM 7 [17] A108-029 ISUE SIGNALERT [Shared]
8:20 AM 6 [14] [Position Report Comment] ***** 1029 ROAD ONE TOW 858-482-8238 WIND ***** [Shared]
8:18 AM 5 [10] Notification [CHP]-CDF 97 ADV TRCT TRUPL ON SBE LOADED W CARDBOARD/ BOTH LNS ARE BLOKD // WILL NEED HD 1186 / ADV CT IN REGARDS TO CARDBOARD [Shared]
8:10 AM 4 [8] CLOSE TO DELZURA POST OFFICE [Shared]
8:10 AM 3 [5] 1028 CDF-SD [Shared]
8:09 AM 3 [2] [Appended, 08:10:00] [1] CT TB PARTLY BLOCKING HD
8:08 AM 1 [1] COMMERCIAL TRK B/U(HMB)

P 1/4

RESPONSES

G1 As stated in Final EIR Section 1.2.1, the purpose of the Project is to:

a. Provide appropriate access to and from SR-94 and the approved JIV Gaming Development Project.

b. Lessen direct traffic impacts caused by the JIV Gaming Development Project on SR-94.

c. Improve the geometric design of the main access between SR-94 and the JIV Gaming Development Project.

d. Improve the geometrics of SR-94 in the vicinity of Melody Road and Reservation Road in a manner consistent with the SR-94 Transportation Concept Summary (TCS) and the 2050 RTP.

Please see RTC B1.

G2 The Final EIR includes a detailed evaluation of the potential traffic-related impacts associated with the implementation of the intersection and roadway segment improvements, which are designed to mitigate traffic increases resulting from a separately approved JIV gaming facility. The SR-94 Improvement Project would not result in an increase in traffic.

The traffic study included in the Final TEE prepared for the JIV gaming facility provided an evaluation of the most likely routes for the traffic associated with the gaming facility. The most likely routes were determined based on a Series 11 Regional Model Select Zone run prepared by SANDAG for the project. The select zone run was conducted for the year 2015 (Near Term) and 2030 (Horizon Year). The select zone runs prepared by SANDAG provided an estimated traffic distribution for the project based on the anticipated land uses and roadway network conditions assumed by the Year 2015 and 2030. These assumptions are consistent with the City of San Diego's Regional Plan and the County of San Diego's General Plan. The analysis included in the Final TEE for the JIV gaming facility included an evaluation of existing traffic conditions versus future conditions, with and without the traffic generated by the gaming facility. For the SR-94 Improvement Project, because the JIV

COMMENTS	RESPONSES
	gaming facility is currently under construction and is expected to open for business in the relatively near future, the analysis assumes operation of the gaming facility. The Proposed Project does not examine the effects of the proposed project road and intersection improvements without the gaming facility since the transportation improvements would not be constructed without the gaming facility. Please see RTC E8.
	G3 The intersections and roadway improvements included in the Final EIR would provide standard 8-foot shoulders within the footprint of the improvements. The environmental effects of the gaming facility were evaluated in the Final TEE available at: *http://www.jamulindianvillage.com/relevant-documents/*. Please see RTC B1, B2 and C1.
	G4 In the unfortunate event of a road closure along SR-94, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions on how to safely manage the street network. These events occur randomly and with different circumstances. Each situation is handled differently using the judgment of trained traffic control officers. The improvements included in the Proposed Project would provide standard 8-foot shoulders within the footprint of the improvements and additional lanes that would provide more space for vehicles to move to the side, allowing emergency vehicles to travel along SR-94. In addition, emergency vehicle preemption equipment would be installed at all signalized intersections within the project footprint.

COMMENTS

First two miles of closure and backup on SR-94 between Rancho Jamul Ecological Reserve and Otay Lakes Rd. due to crash.

2. OTAY LAKES ROAD

G5 **2-A. NO ASSESSMENT OF** Why was no assessment done on the impacts to Otay Lakes Road, and especially the intersection of Otay Lakes Rd and SR-94?This is the PREFERRED ROUTE FROM SOUTHBAY AND TIJUANA to Jamul. It is shorter and more direct than the route via Jamacha Junction (SR-54 and SR-94). Otay Lakes is a dangerous, narrow, twisting, unlit road with non- standard lane and shoulder widths.

G6 **2-B. ADDITIONAL FATALITIES, CRASHES AT OTAY LAKES RD AND SR-94:** How many additional serious crashes, injuries, and fatalities are anticipated at the intersection of Otay Lakes Rd and SR-94 due to the increase in traffic from Eastlake, Southbay, and Tijuana. Please include the methodology for your analysis.

G7 **2-C. BLIND INTERSECTION at SR-94 and Otay Lakes Rd** At the SR-94 intersection, visibility to the east while turning left from Otay Lakes Road is blocked due to the hillside that encroaches right up to the roadway. The addition of Casino traffic will make this left turn highly dangerousdue to the oncoming traffic traveling at high speed (55MPH) and the "blind" corner.

Visibility from Otay Lakes Rd to SR-94 is extremely limited— "blind". What are the impacts of additional casino-related traffic on this intersection?

The left turn from Otay Lakes Rd onto westbound SR-94 is blind to westbound oncoming traffic moving at 55 mph.

P 2/4

RESPONSES

G5 The Proposed Project consists of specific roadway improvements designed to address traffic increases resulting from the JIV gaming facility. These traffic improvements do not generate traffic and would not adversely affect Otay Lakes Road. Section 2.4 Traffic and Transportation of the Final EIR demonstrates that the operations at the intersection of Otay Lakes Road and SR-94 will not change with the implementation of the Proposed Project. To the extent that the commenter's concerns deal with the JIV Gaming Facility Project, please see RTC B1, B2 and C1.

G6 The Proposed Project is not expected to increase accidents in the stated location. To the extent that the commenter's concerns deal with the JIV gaming facility, please see RTC B1, B2 and C1.

G7 Please see RTC G5.

COMMENTS

G8

3. NO ASSESSMENT OF ALTERNATE ROUTES FROM EAST

The following roads are already seeing greatly increased traffic attempting to avoid the flagging operations at the casino construction site:

- Honey Springs Road (7.6 MILES)
- Skyline Drive (7.1 MILES)
- Lyons Valley Rd (1.6 MILES)
- Jamul Drive (5.3 MILES)

Why has no analysis or assessment been made of these alternate routes? With the impacts of casino construction, these routes have already seen a large increase in traffic, especially during morning and evening commute times, but also during the days when they are used to avoid being stopped by flaggers at the construction site.

- How many **more** cars are *currently* using these routes— vs. pre-construction data?
- What additional increase in traffic is projected if the Casino becomes operational? Compare to pre-construction.
- What measures will be in place to divert bus and truck traffic from using these two-lane rural roads and impacting residents along all 25-plus miles of alternate roadways.
- These alternate routes include significant up and down grades. How will safety be impacted by the additional traffic in these areas?

ALTERNATE ROUTES **NOT** INCLUDED IN IMPACTS or MITIGATIONS

Map of Alternate Routes with Mileage. These routes avoid the signage, signals, and casino-related traffic on SR-94. Where is the assessment of impacts on these roads due to increase in casino-related vehicle, bus, truck traffic?

G9

4. IMPACTS ON EMERGENCY RESPONSE TIMES AND WILDFIRE EVACUATION VIA SR-94

SR-94 is the only accessible evacuation route for residents in the event of wildfire. Since the installation of the SDG&E Powerlink transmission lions, residents of Jamul-Dulzura are now labeled "Assets at Highest Risk of Catastrophic Wildfire." Any attempt to accommodate MORE traffic on the already sub-standard evacuation route will pose huge risks to residents of these vulnerable communities. Australia suffered its own Black Sunday when evacuees were unable to navigate narrow roads clogged with collisions and disabled vehicles. Nearly 200 died. Most were found inside cars attempting to flee. CalFire warns us to prepare for exactly this kind of wind-driven fire. They tell us it's a matter of when, not if. CalTrans must not contribute to what is already a very dangerous evacuation scenario by further degrading road access and mobility.

The map below is from SDG&E's Final EIR and shows how wildfire is projected to spread during extreme conditions. Extreme conditions occur yearly, usually more than once. As I write this on October 4, 2013, fire and wind conditions are expected to be EXTREME within the next 24 hours. This is not a rare event.

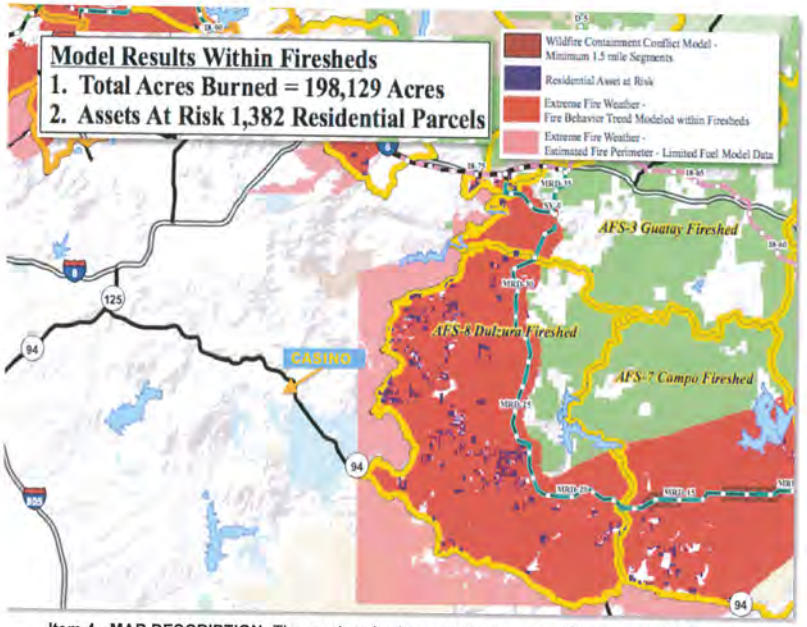
P3/4

RESPONSES

G8 Please see RTC B1, B2 and C1.

G9 Section 2.5.2 of the Final EIR states that emergency response times are expected to improve post-Proposed Project as intersection operations improve with the exception of the left-bound turn onto SR-94 from Jamacha Boulevard. At this location, ample width for safe passage for fire and emergency vehicles is available should fire, emergency and/or law enforcement vehicles need to access SR-94 northbound from Jamacha Boulevard under the Horizon Year scenario 2035.

COMMENTS



G10 **Item 4 - MAP DESCRIPTION:** The purple splotches with the red show "Assets at Risk." These are **homes at the highest risk of loss in wildfire.** The map shows the expected fire behavior in these conditions, expected to become more frequent in future years. All of the Deerhorn Valley Community lies within the area designated home is one of those splotches, and my evacuation route westbound SR-94.

Caltrans must not accommodate mega-casinos and projects that block the primary evacuation route (SR-94). To do so is to increase risk of many citizens not surviving the next fire—because the narrow two-lane highway is blocked by casino patrons attempting to flee. Wildfires happen at all hours of the day. This casino plans to operate 24/7 also.

What potential (and additional) dangers will the mitigation measures casino traffic pose during wildfire emergencies and emergency response times when SR-94 is closed or blocked by crashes. What impacts face residents? What impacts will casino patrons face?

G11 **5. WHERE IS THE EXPLANATION OF CHANGE IN CALTRANS' PREVIOUS DETERMINATION THAT IMPACTS ON SR-94 WERE UNMITIGABLE?** Please explain the events reversed the previous CalTrans' determination that previous Casino access to SR-94 was unmitigable. What has changed that led to this latest determination that mitigation could be done? This lack of organizational transparency has led to the further demise of community trust in your public agency. Safety first.

CALTRANS MISSION STATEMENT *(annotated by DVCA in red)*

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

Approved 8/6/2015 RE Hamilton Co President

P4/4

RESPONSES

G10 Please see RTC B1 and RTC G9.

G11 The commenter does not refer to any specific Caltrans statements that "Casino access to SR-94 was unmitigable." It is the responsibility and mission of Caltrans to ensure and enhance the safety of state roadways. The Proposed Project will substantially improve the safety of SR-94 in the vicinity of the JIV gaming facility. Please see RTC B3.

During the EIR process, all reasonable alternatives were studied to compare differing impacts to SR-94. The alternatives studied included: access at Melody Road, access via the four acre parcel north of Reservation Road, and access via Reservation Road. Since the completion of the Draft EIR, and after reviewing public comments on the Draft EIR, Alternative 2: Daisy Drive Option 1 was identified as the Preferred Alternative. This alternative does not require design exceptions to Caltrans design standards. Additionally, public safety and welfare would not be jeopardized with section of Alternative 2: Daisy Drive Option 1.

COMMENTS

August 27, 2015

JAC is a community organization that was formed in 1988 with a desire to improve and safeguard our community to all who live here. JAC has a reputation for adapting to the needs of this community while we strive to provide positive education to the people who live and enjoy recreation in our area. We responsibly object to those things that we believe are detrimental to the welfare of our community.

H1 We welcome the opportunity to respond to Caltrans's Draft Environmental Impact Report for the SR 94 improvement Project. We believe, however, that there has not been sufficient time for the public to review and provide their comments, even though we note that most of the information in the current DEIR seems to have been copied from the JIV's unqualified Environmental Evaluations that date back to 2003. These previous evaluations did not adequately address the unmitigable impacts that this project and previous proposed projects presented.

H2 JAC believes that it is important to point out that two past Governors of California found this project's significant degradation of the environment and desecration of cultural resources unmitigable and not in compliance with the Gaming Compact. Further, it is our contention that the JIV has no right, permit or authorization to build a casino on the government's portion of the Indian Cemetery and that such construction is a deliberate violation of the Indian Gaming Regulatory Act, CEQA, and NAGPRA. Further, JIV was not recognized under federal jurisdiction in 1934 and the JIV does not have land that has been put into trust and therefore it does not qualify for Indian Gaming.

H3 Caltrans Draft EIR does not comply with the California Environmental Quality Act and the SR 94 Improvement Project must not be started until Caltrans complies with the law.

H4 The mitigation that Caltrans is considering for the proposed project does not adequately take into consideration the entire community and the traffic management for that community. There is no consideration for all connecting roads and the impacts that the project's traffic will have on all motorists using SR 94. For example, the proposed improvements call for a widening of SR 94 before and after the Sweetwater River Bridge causing a funnel effect which would force traffic to squeeze into two lanes from four on each side of the bridge. The bridge should be built for 4 lanes on each side. Additionally, the Draft EIR has not considered all the feeder roads and private driveways that provide residents with their only access to SR 94.

H5 Increased traffic-9,000 vehicles per day will severely impact all roads off SR 94. Turning lanes should be provided at many of the feeder roads for the safety of all motorists. Steele Canyon High School and Cougar Canyon Drive need improvements due to the increased vehicle traffic. The DEIR does not address any accommodations for all the students approaching the school or crossing at the Sweetwater River Bridge-there are no alternatives to the route to the high school.

RESPONSES

H1 The public was provided a 45-day public review and comment period, which is consistent with State law. Caltrans disagress with the statement that most of the information in the current Final EIR was copied from the JIV Final TEE. The last sentence of the comment appears to be referencing the JIV gaming facility, which is a separate project. Please see RTC B1, B2 and C1.

H2 The commenter is refeering to the JIV gaming facility. Please see RTC B1, B2 and C1.

H3 The commenter does not specify how Caltrans fails to comply with CEQA. Caltrans believes is has fully complied with the CEQA as it applies to the SR-94 Improvement Project.

H4 To the extent that this comment focuses on traffic from the JIV gaming facility, see RTC B1, B2 and C1. With respect to the Sweetwater River Bridge, adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54– Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.

With respect to feeder roads and private driveways that provide access to SR 94, the analysis included in the Final EIR was prepared following the Caltrans' Guide for the Preparation of Traffic Impact Studies, dated December 2002. Per the guidelines outlined in this document, all intersections and roadway segments where the project would make modifications were analyzed in detail using the methodology and criteria stated in Caltrans' guidelines.

H5 The roadway improvements analyzed in the Final EIR are in response to an encroachment permit application submitted to Caltrans for select intersections and JIV access road, which were identified in the JIV Final Tribal EE as being significantly impacted from

COMMENTS

H6 The DEIR makes no mention of improvements to SR 94 east of the construction site. No mention of any improvements at the intersections of SR 94 and Otay Lakes Road and Honey Springs Road. This seems to be a glaring omission since all of the traffic coming from the project site during the initial stages of excavation turned right from the project and headed down Otay Lakes Road! Many motorists will be coming to the project via Otay Lakes Road and from further east on SR 94 and yet the DEIR makes no mention of how traffic will be affected or possibly mitigated.

H7 It is of great concern to JAC and the community that the businesses at the intersection of Steele Canyon Road and SR 94 will be heavily impacted and possibly put out of business due to the removal of parking spaces. It is already dangerous situation to access the businesses at this intersection and with fewer parking spaces that danger will increase.

H8 The addition of new traffic lights at several locations along the SR 94 will slow all traffic including emergency response vehicles. This poses a threat to the public safety in situations such as fire evacuation and major accidents. SR 94 was closed for 10 hours on August 14 stranding many motorists in 100 degree weather. This was not an isolated incident. Our community has had to evacuate in recent years due to fire and SR 94 is our primary artery in and out for the majority of our residents.

H9 Caltrans has required Peaceful Valley Ranch, a private development, to enter 94 at the Melody Road intersection. Caltrans has also directed the SD Rural Fire District to not take direct access to SR 94, but to access it at Melody Road. Caltrans has repeatedly declared that they "would never treat a private developer or sovereign nation differently". JAC urges Caltrans to maintain this standard with respect to this project and make Melody Road the preferred alternative.

H10 Caltrans has in the past mentioned in letters from them to the JIV that Melody Road is the best access for the project. In August 2006- Mario Orso of Caltrans stated: "Access to this proposed development will only be allowed via existing Melody Road. This was reaffirmed in a letter dated October 2008 by Al Cox of Caltrans. Also Bill Figge of Caltrans in January of 2007 stated: "Caltrans prefers that access to the development from SR 94 be pursued via Melody Road. Caltrans District Director Pedro Orso-Delgado, stated, "Caltrans still views Melody Road as the most desirable access for the Tribe's proposed project..."

H11 JAC urges Caltrans to require that all mitigation be completed prior to the opening of the facility. It is our concern that any construction to SR 94 improvements that are not completed prior to any opening will only compound traffic problems that are already unmitigable.

JAC hopes that Caltrans hears our concerns and will do whatever is possible to make travel safe on SR 94 for all! Please consider that SR 94 requires more improvements then were addressed in their Draft EIR.

JAMUL ACTION COMMITTEE
P O BOX 1317
JAMUL, CA 91935
Jacjamul.com

RESPONSES

H5 cont operation of their gaming facility (see Final EIR Section 1.1 Introduction/Project Background). The SR-94 Improvement Project EIR analyzes the environmental effects of constructing and operating these proposed roadway improvements. The JIV gaming facility is not an element of the SR-94 Improvement Project. The features of the SR-94 Improvement Project (see Final EIR Section 1.3 Project Description) would not impact Steele Canyon High School, Cougar Canyon Drive or the Sweetwater River Bridge.

H6 This comment appears to concern traffic from the JIV gaming facility. See RTC B1, B2 and C1.

H7 As noted in the Final EIR, the implementation of the improvements at the intersection of Steele Canyon Road and SR-94 would have a short term impact to the parking supply of some of the nearby businesses. As stated on page 2.3-9 of the Final EIR, prior to construction of the proposed roadway improvements at the intersection of SR-94 and Steele Canyon Road, the landowners and business owners affected by construction and implementation of the improvements would be contacted in advance of any potential approval for parking reconfiguration or replacement as a result of the proposed project. It is anticipated that as part of the project, additional parking spaces could be provided to support the existing businesses. In addition, coordination of the the construction phasing for the improvements, which would be constructed to minimize the temporary parking impact during construction, would include the existing business and property owners affected by the construction. At the completion of the improvements, the existing parking spaces currently within Caltrans ROW would be eliminated. The final parking configuration of the existing businesses adjacent to the proposed improvements would need to be compliant with the County of San Diego's parking requirements.

The improvements at the Steele Canyon Road and SR-94 intersection were designed to increase queuing capacity at the intersection and decrease overall vehicle delays.

COMMENTS	RESPONSES
	H8 All existing and new traffic signals along SR-94 include emergency vehicle preemption capabilities that allow the traffic signal to turn green when a emergency vehicle is approaching a signalized intersection. This is consistent with most other signalized intersections in the County of San Diego and along Caltrans facilities. In the unfortunate event of a road closure along SR-94 or an emergency event within the Community of Jamul, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions on how to safely manage the street network. These events occur randomly and under different circumstances. Each situation is handled differently using the judgment of trained traffic control officers. When an emergency occurs, vehicular traffic is required to move to the shoulder and allow emergency vehicles to pass. The improvements included in the Final EIR would provide standard 8- foot shoulders within the footprint of the improvements and additional lanes that would provide more space for vehicles to move to the side allowing emergency vehicles to travel along SR-94. In addition, emergency vehicle pre-emption equipment would be installed at all signalized intersections within the project footprint. The improvements would enhance the capacity of emergency vehicles to navigate along SR-94.
	H9 Please see RTC B3.
	H10 As stated in Section 1.6 of the Final EIR, Caltrans has identified Alternative 2: Daisy Drive Access; Option 1 Full Footprint as the Preferred Alternative.
	H11 If the SR-94 Project is approved, the JIV has committed toconstructing the improvements immediately upon receipt of a Caltrans Encroachment Permit. Caltrans cannot postpone the opening of the JIV gaming facility.

COMMENTS

Jamul Dulzura Community Planning Group
P.O. BOX 613 • Jamul, CA 91935

August 25, 2015

David Nagy
Environmental Branch Chief
California Department of Transportation District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

RE: Jamul Dulzura Community Planning Group Comments
Draft Environmental Impact Report State Route 94 Improvement Project

Dear Mr. Nagy:

Caltrans is the lead agency for CEQA concerning environmental impacts resulting from an economic development project by the Jamul Indian Village (JIV). Caltrans has a responsibility to make travel safe on state highways for all, and it is understandable the first concern would fall to the directly impacted SR-94 highway. Caltrans' stated mission is to "provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability". Jamul Dulzura Community Planning Group believes that Caltrans would be abdicating its responsibility by accepting a minimal set of improvements to five intersections as mitigation for a major commercial development that will bring a projected 9,000 additional Average Daily Trips (ADT) on SR-94.

I1 The scope of mitigation as proposed is far too narrow. A "whole community" approach to traffic management needs to be taken if Caltrans is going to fulfill its obligations to all Californians. To ensure traffic safety, Caltrans must take into consideration all connecting roads and impacts on them. The proposed improvements take only a restricted and incomplete examination of a single transportation asset. Missing from their analysis is the impact on the flow of traffic from four lanes reduced to two lanes across the bridge over the Sweetwater River in both directions. The widening of SR-94 before and after this bridge will cause a dangerous "choke point". As part of the required mitigation, the bridge **must be widened** to be equally as wide as the road in order to avoid forcing traffic to squeeze into two lanes from four on both sides.

I2 The Draft Environmental Impact Report (DEIR) is looking solely at SR-94 and surface roads off of SR-94 are not considered. Feeder roads, providing residents their only vehicular access, include Millar Ranch Road (which houses critical infrastructure components on San Miguel Mountain), Cougar Canyon Road, Noah Homes Entrance, Vista Sage Lane, Vista Diego Road, Hillside Drive, Short Court and Las Palmas Drive, as well as the pump station and several smaller driveways are all severely impacted. Turning lanes need to be provided at all of these locations for safety of all motorists. In addition, the area near Steele Canyon High School and Cougar Canyon Drive is not adequately improved for increased vehicle traffic. There are no accommodations to address the hundreds of students, including runners from the Cross Country team, and bicycle traffic approaching the school or crossing the Sweetwater River Bridge who have no alternative but to use this route.

RESPONSES

I1 The Proposed Project being evaluated is the SR-94 Improvement Project and the impacts that result from these proposed traffic improvements identified in Chapter 1 Proposed Project of the Final EIR. The Project does not include the JIV gaming facility. The comment concerning the flow of traffic from four to two lanes across the bridge over the Sweetwater River is directed at the commenter's issue with the increased traffic from the JIV gaming facility. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards. The SR-94 Improvement Project would not alter the flow of traffic over the Sweetwater River. The scope of the mitigation provided throughout the Final EIR is focused on those impacts caused by the construction/operation of the features described in Chapter 1.0 of the Final EIR. Therefore, we disagree with the comment that the scope of the mitigation is "too narrow." Please see RTC H5.

I2 The Proposed Project would not increase traffic along either SR-94 or the adjacent roadways. The commenter's reference to additional traffic is a reference to the JIV gaming facility. Please see RTC H5. The SR-94 Improvement Project would result in improved operating conditions along SR-94 compared to the No Project/Baseline conditions.

COMMENTS

There are valid concerns regarding other routes to and from the JIV Project including but not limited to, Proctor Valley Road, Otay Lakes Road, Honey Springs Road, Steele Canyon Drive, Jamul Drive, Skyline Truck Trail and Lyons Valley Road, which are used extensively when SR-94 becomes congested in emergency situations such as fire evacuation or a major accident. The additional traffic, with increased signaling and choke points, present a threat to public safety and increased emergency response time. The fire danger in our area is of great concern! Our community has had to evacuate several times in the last few years, and SR-94 is our primary ingress and egress for the majority of our residents. SR-94 is especially vulnerable to fire as it crosses thousands of acres of conservation wilderness land. These are highly fire-prone watershed areas. Current drought conditions have placed California in a state of emergency exasperating an already critical concern. I3

SR-94 is a major corridor for commercial and governmental traffic. According to a May, 2014, report by SANDAG, the Tecate Port Of Entry (POE) handled 48,000 northbound trucks and 1.5 million passenger vehicles, with an economic impact of $674,000,000 which is important even beyond our region. Any improvements need to consider large trucks' interaction with the proposed increased traffic going to and from the Tecate POE as an impact to regional commerce, which needs to be mitigated. I4

SR-94 is a popular bicycle route used frequently for large events with riders utilizing the road shoulder from Jamacha Blvd. through Otay Lakes Rd. Bicycle clubs hold weekend events on a regular basis with fifty to one-hundred bicyclists riding as a group. For example, the 2015 *Campagnolo Gran Fondo* event last April drew over 1,500 entrants. Adding 9,000 ADT to the traffic can be expected to significantly increase the risk for bicyclists and motorists, and needs to be mitigated. Bike lanes need to be included in all of the alternatives. I5

CEQA requires that Caltrans take into consideration environmental impacts including the wildlife corridors and concomitant roadkill. According to UC Davis' Road Ecology Center co-director Fraser Shilling, "The rural East County community of Jamul has garnered some statewide attention: the stretch of Highway 94 that runs from Rancho San Diego east toward Dulzura was ranked by researchers at UC Davis as one of the state's top hot spots for roadkill observations." However as striking as this may be, the California Fish & Wildlife (CFW) stated that a more professional and in-depth on-the-ground study, and not a drive through windshield study, has to be done to get a clear picture of the real numbers in wildlife roadkill. In response, Caltrans stated that they were making plans "to build five new wildlife crossing structures along the corridor." The CFW suggested overpasses or underpasses to create safe corridors. The data on this subject and the studies by Caltrans to mitigate this growing disaster are not integrated into the SR-94 improvements. Caltrans at this time is not incorporating the historical records into their analysis, and is depending completely on the information supplied by JIV. What has Caltrans required of JIV to avoid making this situation worse with the addition of 9,000 ADT? I6

Following is a list of further specific concerns for the mitigations as proposed:

- There are no improvements proposed on SR-94 east of the construction site. Impact on this segment is expected to be felt as far as Tecate. A major oversight is the omission of improvements at the intersections of SR-94 with Otay Lakes Road and Honey Springs I7

RESPONSES

I3 Caltrans does not disagree with the statements in the comment related to the importance of SR-94 as a primary route in the area (including during wildfire events) and the fact that the route is surrounded by many acres of conservation wilderness land, which can support wildfires. As part of the Proposed Project, the signalized intersections would be equipped (installed or upgraded) with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). These sensors, as well as the focused turn lane improvements provided as part of the project, would be expected to facilitate fire/ emergency response and to be an improvement over the existing condition. Please see RTC G9.

I4 The comment appears to misunderstand the Proposed Project being evaluated in the Final EIR. The gaming facility currently under construction is not the Proposed Project. Please see RTC B1.

I5 The SR-94 Improvement Project will not add 9,000 ADT to traffic. Roadway improvements are designed to comply with Caltrans design standards. Please see RTC I4.

I6 Wildlife corridors and roadkill were thoroughly analyzed in the Final EIR (see Final EIR Section 2.19.3). Hotspots of higher roadkill were disclosed, and are consistent with the commenter's description of problem areas. Roadkill typically increases with increases in traffic volumes. However, the Proposed Project would not increase traffic volumes. Therefore, the Final EIR concluded that implementation of the Proposed Project would not significantly increase roadkill. Furthermore, four existing wildlife crossings would be improved by the installation of a new bridge at the Melody Road intersection and the enlargement of three culverts under SR-94.

I7 Please see RTC H5.

COMMENTS

Road. JDCPG has repeatedly recommended acceleration and deceleration lanes on SR-94 at Otay Lakes Road to allow for safe ingress and egress due to the increase in traffic to and from South Bay.

I8

- The proposals include several changes in lane count from two to three or four, then back to two. These can be expected to increase opportunities for accidents and congestion especially when considering the commercial traffic involvement. This will be most pronounced if there are multiple signals installed in close proximity to each other.

I9

- Businesses at the intersection of Steele Canyon Road and SR-94 are impacted long-term by the removal of parking spaces. It is noted on Page 2.1-21 that the remaining spaces meet the minimum requirement by County Code, but the loss of 23 parking spaces will be a considerable hardship. We believe the added lanes on SR-94 at this intersection only add storage for vehicles stopped for the light, and have the potential to aggravate what is already a dangerous maneuver to access the businesses on the south side of SR-94. The modifications do not offer enough merit to counter the economic cost to these businesses, nor the difficulty of another traffic merge past the light and should be altered.

I10

- The current proposal presents Alternatives 1 & 2 with access directly from SR-94 into the JIV Project site. All options using direct access to SR-94 have major safety issues by stopping traffic on SR-94 at or near a location with poor visibility in either direction. It is important to remember that our rural area is a magnet for tourism on the Scenic Highway. Visitors from the San Diego region and beyond come to enjoy these rural environmental assets for backcountry recreation and wilderness field trips as well as professional wildlife studies. All the options for entry directly onto SR-94 also add another signal in very close proximity to one being planned at Melody Road, which we feel is counterproductive and creates an unnecessary nexus of traffic congestion.

JDCPG has always felt that Caltrans was correct in previous assessments that the best access alternative for the project is to use Melody Road, which is proposed as Alternative 3 in the DEIR. Please refer to the excerpts from the following Caltrans letters to JIV:

I11

- August, 2006 **Mario Orso of Caltrans** stated: "Access to this proposed development will only be allowed via existing Melody Road";
- October, 2008 **Al Cox of Caltrans** Development Review Branch reaffirmed this position;
- January, 2007 **Bill Figge of Caltrans** clearly stated that "Caltrans prefers that access to the development from SR-94 be pursued via Melody Road";
- January, 2008 **Mark Bobotis of Caltrans** stated, "meeting options for access along SR-94 and Melody Road, including alignment, ...should be included" ;
- April, 2007 **Pedro Orso-Delgado, Caltrans District Director** states, "Caltrans still views Melody Road as the most desirable access for the Tribe's proposed project because it is the most compatible with existing traffic and other proposed development in the Jamul community" confirming once gain Caltrans stated preference.

(Copies of letters supplied upon request)

3

RESPONSES

I8 The Proposed Project includes intersection and roadway segment improvements along SR-94. Each of the improvements would be implemented to meet Caltrans Highway Design Manual standards and the California Manual on Traffic Control Devices. With the exception of the improvements at the intersection of SR-94 and Steele Canyon Road, none of the improvements are proposing to change or increase the classification of SR-94 from a 2-lane conventional highway to a 3- or 4-lane conventional highway. The intersection and roadway segment changes proposed by the project would add turning lanes at key intersections along SR-94.

The traffic signal spacing proposed for the new traffic signals along SR-94 meet the requirements for a conventional highway facility as defined in the Caltrans Highway Design Manual.

I9 As noted in the Final EIR, the implementation of the improvements at the intersection of SR-94/Steele Canyon Road would have a short term impact to the parking supply of some of the nearby businesses. As stated on page 2.3-9 of the Final EIR, prior to construction of the proposed roadway improvements at the SR-94/Steele Canyon Road intersection, the landowners and business owners affected by construction and implementation of the improvements would be contacted in advance of any potential approval for parking reconfiguration or replacement as a result of the Proposed Project. It is anticipated that as part of the project, additional parking spaces could be provided. In addition, coordination of the construction phasing for the improvements, which would be constructed to minimize the temporary parking impact during construction, would include the existing business and property owners affected by the construction. Upon the completion of the improvements, the existing parking spaces currently within the Caltrans ROW would be eliminated. The final parking configuration of the existing businesses adjacent to the proposed improvements would need to be compliant with the County of San Diego's parking requirements. As indicated in the Final EIR, there is sufficient room on the subject properties and outside the Caltrans ROW for the businesses to meet County parking requirements.

COMMENTS	RESPONSES
	I9 cont The improvements at the SR-94/Steele Canyon Road intersection were designed to increase queuing capacity at the intersection and to decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, and acceleration and deceleration lenghts were designed per Caltrans Highway Design Manual and the California Manual on Traffic Control Devices. Having a second lane in the eastbound direction, which is part of the Proposed Project, would facilitate and enhance the access for the businesses along the south side of SR-94, as the second lane would provide an oportunity for a slower lane of traffic for vehicles making a right-turn movement. The existing two-way left-turn lane along SR-94 would be maintained to facilitate the movement in and out of the existing driveways.
	I10 Access Alternatives 1 and 2, with access directly from SR-94 to the JIV gaming facility, were designed per Caltrans Highway Design Manual standards and the California Manual on Traffic Control Devices. To enhance the visibility of the new traffic signals at the proposed access locations along SR-94, "signal ahead" warning signs and pavement markings would be installed according to the requirements of Caltrans standards. These signs and pavement markings would assist those travelers not familiar with the roadway to see the existing traffic signal while approaching the intersection. The warning signs and pavement markings would be installed in a way that would provide sufficient stopping sight distance per the California Highway Desing Manual standards. The traffic signal spacing proposed for the new traffic signals along SR-94 meet the requirements for a conventional highway facility as defined in the Caltrans Highway Design Manual.
	I11 Caltrans did not have a preferred access point for the JIV at the beginning of the CEQA process for the SR-94 Improvement Project. In a January 17, 2007 letter to the JIV, Caltrans did cite a preference for access via Melody Road based on the JIV's project plans at that time. Caltrans has asked that all reasonable alternatives be studied to compare differing impacts to SR-94. The alternatives studied in the SR-94 Improvement Project EIR include access to Melody Road, access via the four acre parcel north of Reservation Road, and access via Reservation Road. Since completion of the Final EIR, Caltrans has selected Alternative 2: Daisy Drive Access; Full Footprint Option as the preferred alternatives (see Final EIR Section 1.6).

COMMENTS

It is also important to remember that Caltrans required Peaceful Valley Ranch, a private development, to enter SR-94 at the Melody Road intersection. We were repeatedly assured in face-to-face meetings, that Caltrans "would never treat a private developer and a sovereign nation differently." We are not aware of any conditions that have changed to give Caltrans cause to alter their previous position and demonstrated requirements. Caltrans states many times that "The safety of the traveling public is our highest priority". **We would urge you to maintain this standard in the requirements for this project and make the Melody Road, Alternative 3, Caltrans' preferred alternative.**

I12 The Key View Locations starting with Figure 2.6.1 through 2.6.18 are all quite misleading as they show an extremely minimal number of vehicles travelling on SR-94 or any of the feeder streets. We question the credibility of these photographs and would ask that you look at the photographs we have attached that show a more typical number of vehicles on our road without the additional 9000 ADT estimated with this development. An adequate road study during peak traffic times needs to be completed.

I13 The proposed Non-Access and Access Road Alignments are totally inadequate to mitigate the overwhelming traffic-related environmental problems that occur with the addition of 9,000 cars on SR-94. On page 3-21 the statement is made "The Proposed Project would not result in long-term vehicular related emissions as the Proposed Project does not itself increase traffic". This statement is confusing at best, as the increased traffic from the casino project is **the** reason for the proposed project. The additional traffic, with controlled intersections and vehicular storage areas, has the potential to increase aerially deposited lead (ADL) and other contaminants into the surrounding area, which settle in close proximity to the road and increase the environmental impact in our rural area.

I14 Using their figures on pages 3-4 and 3-5, the DEIR lists fifteen proposed projects with a number of maximum possible home sites that total 310. If one multiplies that maximum number by 12 ADT per home, one is still well below the proposed 9,000 ADT for this development and yet the DEIR consistently uses the phrase, "When other projects are considered, residential and commercial development throughout the Jamul community is continuing, contributing to the transformation of the rural area to a more built urban environment." The point is that none of these proposed projects individually nor collectively will have comparable significant impacts as found in this project, which are not being mitigated to the extent to make them considered non-significant impacts.

I15 Perhaps most concerning is the timing of the implementation of all improvements designated as mitigation measures. Increased traffic can be expected to begin with the opening of the project. Any construction to SR-94 improvements not completed at that time would exponentially compound the problems due to the dramatic increase in traffic. Therefore **it is imperative that Caltrans require all of the mitigation to be completed prior to opening of the facility** as recognized by Caltrans in their letter to JIV, dated April 2012, in section 4.9 which states "…should be the responsibility of the JIV to implement the described improvements **prior** to the opening of the gaming facility."

I16 We strongly request that Caltrans require more improvements to SR-94 at the intersections we have listed to make sure adequate mitigation is included in the areas in which we have voiced our concern for the safety of our residents and visitors. In addition, we would ask Caltrans to

RESPONSES

I12 The Key View before photos and simulated images are intended to show the roadway improvements with a couple of cars only for scale. These photos and simulations are not intended to show the amount of traffic.

I13 Chapter 2.4 *Traffic and Transportation/Pedestrian and Bicycle Facilities* of the Final EIR shows that the operation of the SR-94 corridor would improve with implementation of Alternatives 1-3. The purpose of the EIR is to evaluate impacts of the SR-94 Improvement Project described in Chapter 1.0 Proposed Project of the Final EIR. The air quality impacts of the JIV gaming facility were fully addressed in the Final TEE. A copy of this document may be found at: *http://www.jamulindianvillage.com/relevant-documents/*

I14 The Proposed Project doesn't generate traffic. The current analysis addresses only the cumulative effect of the focused improvements to SR-94 being analyzed in this Final EIR, in conjunction with the list of cumulative projects. The SR-94 improvements would improve traffic flow and would not result in a substantial contribution to significant cumulative traffic impacts.

I15 The Project is the SR-94 Improvement Project, which consists of improvements to various intersections, as well as the construction of an access road from SR-94 to/from the Jamul Indian Village. The Project does not include the construction/operation of the JIV gaming facility. The goal is to have all of the SR-94 Improvement Project features completed prior to the opening of the JIV gaming facility. However, some of these features may not be operational given the projected opening date for the JIV gaming facility. Chapter 2.4 of the Final EIR provides the details of traffic impacts assuming gaming facility traffic and no improvements (see Existing with JIV gaming facility Conditions, Near Term Conditions, and Horizon Year Conditions).

I16 Please RTC B1. The project features were designed to meet the stated Project Objectives (see Final EIR Section 1.2). The SR-94 Improvement Project is not responsible for impacts of the JIV gaming facility.

I17

condition its approval on an agreement from JIV to work with the County of San Diego to improve the significantly impacted roads in their jurisdiction as well.

In conclusion, as duly elected members of our community charged with representing the best interests of the residents of Jamul and Dulzura on land use issues, we urge Caltrans to hear our concerns and help us to ensure the safety of our residents and visitors as they traverse SR-94 and the streets that feed into this scenic highway by requiring the improvements necessary to adequately mitigate these significant impacts that 9,000 additional ADT will bring upon our community. To proceed with **only** the mitigation proposed in this Draft Environmental Impact Report would be negligent, as all of the alternatives are inadequate and much more comprehensive mitigation needs to be required. Please review our iteration of roads that were not even considered in the mitigation, and know it is imperative that they be made safe for our residents!

Thank you for your consideration of our concerns and suggestions.

Sincerely,

Joe Stuyvesant, Chair
Jamul Dulzura Community Planning Group

JS/JM

cc: Supervisor Dianne Jacob
Mark Wardlaw, Director PDS County of San Diego
Eric Lardy, County of San Diego
Congressman Duncan D. Hunter
Congressman Juan Vargas
Senator Dianne Feinstein
Governor Jerry Brown
Joginder Dhillon, Senior Advisor to Governor
Assemblyman Brian Jones
State Senator Joel Anderson
Laurie Berman, Caltrans District Director
Bill Figge, Caltrans Assistant Director
Chi Vargas, Caltrans Advance Planning

I17 Please RTC B1.

Cars Lined up All the Way to the Bridge!

SR-94 Just before Millar Ranch Road

COMMENTS

RESPONSES

Coming across Sweetwater Bridge

Look carefully on right -
note pedestrian & bicyclist

COMMENTS

RESPONSES

COMMENTS	RESPONSES

The morning lineup on SR-94 today....

COMMENTS

RESPONSES

SR-94 and Jamacha

Note huge long line of cars - just before the bridge over Sweetwater River.

COMMENTS

RESPONSES

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: Aug 5, 2015

Comment: The Casino project is not supported by the nearby communities of Jamul and Dulzura. As a resident of Dulzura I have witnessed many accidents on Highway 94. The characteristics of the road are extremley dangerous. Caltrans should recognize that the additional traffic will make the existing dangerous conditions more dangerous. It will also add at least 30 minutes to the commute west toward San Diego. The current law suits with regard to the illegal construction of the Casino are likely to result in the elimination of the Casino even after the construction. If this is true, then all of the so-called Improvement to Highway 94 to facilitate the Casino traffic will have been a terrible waste for all involved.

J1

J2

J3

(Optional information, please print.)

Name Wick Alexander

Organization

Address 1116 Marron Valley Rd.

Phone 619) 281-9847 E-mail wick alexander@yahoo.com

How did you hear about this meeting? letter from CalTrans

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

J1 The gaming facility currently under construction is not the Proposed Project and Caltrans has no authority over its construction or operation. Please see RTC B1, B2 and C1. The Proposed Project would not generate additional traffic, but will ameliorate traffic impacts and improve traffic movement (see Final EIR Section 2.4).

J2 Please see RTC J1.

J3 With resepct to the commenter's claim regarding lawsuits pertaining to the gaming facility, please see RTC E7. Please see RTC J1.

COMMENTS

Julia Allen
3111 Impink Place Jamul, CA 91935

David Nagy, Environmental Branch Chief
California Department of Transportation District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

RE: SR-94 Draft EIR

I, Julia Allen would like to make some comments regarding the Draft EIR for Proposed SR 94 Improvement Project.

K1 1. Why has Caltrans allowed a private entity to begin construction without an encroachment permit? It was my understanding that the rules and regulations of the State of California Highway Codes are for all Developers and their Projects

K2 2. Why is there no mitigation proposed for impacts to Jamul Drive? Traffic will be forced to use Jamul Drive which is the ONLY road west, when SR 94, is shut down, either for construction, or SIG alert

K3 3. Why has Caltrans allowed an exemption to SDG&E to run new power specifically to operate a commercial enterprise along SR 94 without CEQA review or mitigation? (as you know, SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million) Now myself and all other members of the Jamul Community will have to endure numerous traffic delays because of the SDG&E construction

K4 4. The SR-94 Draft EIR does not propose any mitigation for increased emergency service times due to additional traffic

K5 I, Julia Allen want to go on record stating, "that the Draft EIR for the Proposed SR 94 Improvement Project is a flawed, biased document and does not address all the impacts & mitigation required by CEQA"

Sincerely,
Julia Allen

RESPONSES

K1 The comment appears to be referring to construction of the JIV Gaming Facility, which is outside the jurisdiction and control of Caltrans. Please see RTC B1, B2 and C1. Caltrans did issue an encroachment permit for the construction phase of the JIV gaming facility, to allow flaggers and signs within the right of way of SR-94 to enhance and ensure public safety.

K2 With respect to construction of the Proposed Project, as part of its implementation, a Transportation Management Plan (TMP) would be prepared according to Caltran's Deputy Directive 60-R2 (DD-60-R2). The TMP would include specifications on how to provide traffic handling measures along the SR-94 corridor in order to maintain vehicular movement, bicycle access, and emergency response access at all times during construction. During the construction of the Proposed Project, SR-94 will be maintained open to traffic at all times and the need for temporary detours to Jamul Drive or any other parallel street is not anticipated. In the unfortunate event of a road closure along SR-94, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions on how to safely manage the street network. These events occur randomly and with different circumstances. Each situation is handled differently using the judgment of trained traffic control officers.

To the extent that this comment focuses on the impacts of the JIV gaming facility, please see RTC B1, B2 and C1.

K3 The commenter is referring to a separate encroachment permit outside the scope of the SR-94 Improvement Project.

K4 Please see RTC J1.

K5 Each sub-section of Section 2.0 Environmental Setting, Impacts and Mitigation Measures contains an Avoidance, Minimization and Mitigation Measure section. Measures were listed for each significant impact found for the SR-94 Improvement Project. The commenter doesn't specify which mitigation measures are missing.

COMMENTS

From: Roberto Alvarez
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Route 94 and Jamul
Date: Thursday, August 27, 2015 3:39:44 PM

Dear CalTrans,

L1 I am a resident of Jamul and am very concerned about the lack of safety precautions and improvements to Route 94. I am personally not against the Jamul Indian Village Casino, but believe it is crucial for CALTRANS to ensure that 94 will be a safe thorough fare. We have recently experienced a number of serious auto accidents on 94. The Casino will exacerbate all traffic. I urge you to proceed with necessary improvements for the safety of the community and travelers to Jamul.

Sincerely,

Robert Alvarez
1219 Sloan Canyon Road
Jamul, Ca 91935

RESPONSES

L1 The traffic analysis included in the Final EIR (see Final EIR Section 2.4) was prepared following the Caltrans Guide for the Preparation of Traffic Impact Studies, dated December 2002. Per the guidelines outlined in this document, all intersections and roadway segments where the project would make modifications were analyzed in detail using the methodology and criteria stated in Caltrans' guidelines. In addition, those intersections and roadway segments outside of Caltrans' jurisdiction which are within the County of San Diego's jurisdiction were analyzed with the same level of detail as outlined in the County of San Diego's Report Format & Content Requirements - Transportation and Traffic, dated August 24, 2011.

The Proposed Project includes intersection and roadway segment improvements along SR-94. Section 1.1 History of the JIV gaming facility of the Final EIR states that the improvements were identified as mitigation for traffic impacts expected to result from operation of the JIV gaming facility. Each of the improvements would be implemented to meet Caltrans Highway Design Manual standards and the California Manual on Traffic Control Devices. The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 “Bikeway Planning and Design” of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulleting (DIB) 82-05, with includes “Pedestrian Accessibility Guidelines for Highway Projects”. These standards have been established by the California Department of Transportation to maintain the safety of traveling along State Route facilities for all users.

The Final EIR evaluation determined that the proposed improvements would be consistent with the System Preservation and Safety Goal of the existing State, Regional and Local Plans and Programs given that all improvements would be designed and built consistent with Caltrans’ design manual and maintained by Caltrans (within the State right-of-way).

COMMENTS	RESPONSES
From: Ruth **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Please see accompanying e-mail **Date:** Thursday, August 27, 2015 5:12:08 PM M1 I,__Ruth Baak_____ want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Comments have been submitted in accompanying e-mail. Ruth Epstein-Baak	M1 Please see RTC K5.

COMMENTS

From: Ruth
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Impact of EIR
Date: Thursday, August 27, 2015 5:02:07 PM

I am adding my comments to the previously ignored comments regarding the impacts on the traffic caused by the unapproved development of the casino and the impact of the Caltrans actions on the 94 corridor.

M2 Having already lived in a zone where the accident rate sky-rocked with the addition of 5 casinos along the Highway 76 corridor into Valley Center, I am appalled at the fact that Caltrans is ignoring previous experience and the wishes of the inhabitants of the Jamul area.

M3 Mitigation is inadequate. A two lane road in and out of the area (94 corridor) is inadequate to serve the needs of the taxpaying residences of Jamul and other affected communities. The consequences of the additional traffic, coupled with the lack of mitigation on surrounding roads that will need to be used in order for proper ingress and egress out of the community are being shoved under the carpet, and only receiving cursory attention.

M4 The way accidents have been handled as recently as this week serve as examples of the defects in the Caltrans approach.

M5 There is little or no mitigation at the Eastern section (i.e., Honey Springs and Otay Mesa or on Jamul Drive and the increased requirement to find an alternate route for transportation to and from residences. i.e., Skyline Truck Trail.

M6 The effects on travel time, frequency of incidents, and the failure of Caltrans to handle problems efficiently already show that Caltrans has failed the public trust.

There is so much more that can be said, but I would like to go on record as being very much against the approval of the submitted EIR due to it's insufficiencies.

Sincerely,
Ruth Baak
Jamul resident for 11 years and San Diego Resident for more than 40 years.

RESPONSES

M2 To the extent that the commenter's concerns deal with the JIV gaming facility, please see RTC B1, B2 and C1.

M3 The JIV gaming facility is not the Project analyzed in this Final EIR (see RTC B1, B2 and C1). The Proposed Project consists of traffic improvement measures that were identified in the Final TEE for the JIV gaming facility.

M4 Please see RTC G4.

M5 The objective of the Proposed Project is to implement traffic mitigation measures identified in the Final TEE for the JIV gaming facility. Such mitigation measures did not include improvements at Otay Lakes Road, Honey Springs Road or Jamul Drive. Please see RTC B1.

M6 Thank you for your comment.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date:

Comment:

N1 Sound measuring instruments were placed at the top of the hill behind my house. This does not accurately measure the sound levels at my house. The highway is very close to my bedroom (approx 30 yds) With increased traffic going 24 hours, the residential use of my property is negatively affected. A sound wall needs to be placed between the highway & my house.

N2 It is very difficult to get out of my driveway and onto the 94 West during peak hours now. Given the increased traffic and Caltrans plan to drop a lane off the West bound roadway right at my driveway will make it almost impossible to turn out to the 94.

(Optional information, please print.)

Name: L Ward Grant

Organization:

Address: 12856 Campo Rd

Phone: 823-1192 E-mail:

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

N1 Noise measurement locations were used in conjunction with traffic volumes and existing topography to validate the noise model. Validation of the noise model ensures the future model once altered to incorporate the future roadway alignment and elevation data, including any grading, accurately predicts future noise level at selected receiver locations. The noise measurement locations do not represent modeled receiver locations. Thus, once the traffic noise model is validated, the location of the noise measurement is not relevant to the predicted noise level at specific receiver locations, which are chosen to represent the locations of frequent human use that would benefit from noise abatement. Based on the analysis of future noise levels noise abatement walls are not required for the project. Please also note the Casino project was approved under a separate environmental study and is not part of the SR-94 project. The SR-94 project is intended to address future traffic issues from traffic volumes projected to occur on SR-94 in the project vicinity.

N2 The Final EIR includes the evaluation of the implementation of additional travel lanes at the intersection of SR-94/Steele Canyon Road (Near the existing 7/11 store). The improvements at the SR-94/Steele Canyon Road were designed to increase queuing capacity at the intersection and decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, acceleration and deceleration lengths were designed per the Caltrans Highway Design Manual and the California Manual on Traffic Control Devices.

Having a second lane in the eastbound and westbound directions would facilitate and enhance access for the businesses along the south side of SR-94, as the second lane would provide an opportunity for a slower lane of traffic for vehicles making a right-turn movement. The existing two-way left-turn lane along SR-94 would be maintained to facilitate the movement in and out of the existing driveways. The proposed improvements will not affect the access to the 12856 Campo Road property.

COMMENTS	RESPONSES
N2 cont Traveling E on the 94 and turning left across traffic during peak hours is very dangerous. Trucks park on the margin in front of the produce stands and cars turning from the West bound lane to make a left across 94 to the produce stand stop nose to nose in the middle turn lane and neither of us can see oncoming traffic in order to turn.	

COMMENTS	RESPONSES
From: Debbie Beenau **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Highway 94 **Date:** Thursday, August 27, 2015 5:39:30 PM O1 I writing to ask why is Caltrans not notifying the public in Jamul when there is a major crash. This is unacceptable! More and more accidents are happening on this major highway it's a death trap. Many young students drive back and forth to school and I am so concerned about their safety. Something needs to be done to protect human life on highway 94. This is one of the most deadliest roads to travel. We want the community to be protected as they drive these roads. Debbie Beenau. Sent from my iPad	O1 Please see RTC L1.

COMMENTS	RESPONSES
P1	P1 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-6-15

Comment: I am very concerned that a government agency takes the side of a few money hungry people against the communities SAFETY.

Highway 94 is already a dangerous road. It is impossible to mitagate the unsafe access of thousands of cars a day. It will be impossible to access several of the roads coming onto Highway 94. There is already traffic coming from Mexico, which travel at high speeds.

There is NO safe way to allow thousands of cars on this two lane Road. Especially adding lanes then dropping back to two lanes, or adding multiple stop lights. This road CANNOT take that much traffic without taking innocent lifes.

Stop the insanity - Take care of the community.

(Optional information, please print.)

Name C. Beers

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-26-15

Comment:

Q1 There is no way to mitigate all the issues involved in adding thousands of cars on this small two lane road. The access to and from all the private roads off Hwy 94/Campo will be impossible. It is already dangerous to cross the road to enter roads such as Vista Sage & Vista Diego.

Q2 We have a High School that comes right on to 94. The traffic at the beginning & end of school day already makes it unsafe.

Q3 It is very apparent that the people making the decision to allow this unsafe road conditions don't live in the area or are being paid to ruin an entire community. Well the deaths & injuries on this will be on your shoulders.

(Optional information, please print.)

Name: Don Beers

Organization:

Address:

Phone: E-mail:

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

Q1 Please see RTC H5.

Improvements at the intersection of Vista Sage and SR-94 were not included within the Project description or evaluated under this Final EIR. Please see RTC III1.

The installation of the traffic signal at the intersection of SR-94/ Lyons Valley Road was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. The installation of the traffic signal at the intersection of Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

Q2 The Proposed Project will not adversely affect private streets or other roadways. The Project consists of transportation improvements. Please see RTC B1, B2 and C1.

Q3 Please see RTC L1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-6-15

R1 Comments: I am one of the owners of the property at the corner of Highway 94 and Lyons Valley Road in Jamul. We on a daily basis hear screeching car brakes and near misses at our corner. We have had multiple cars come completely through the front yard, through the trees, take out the Fed Ex box and continue through the parking lot. If you widen the road at this intersection, they will be flying into our building. This intersection is already unsafe. We have a steady flow of cars coming through our parking lot to turn around, as they are afraid to make left turns on Highway 94 for fear of being hit by another car. It is scary to pull out of the driveway with cars speeding down the hill. We have traffic from Mexico with huge trucks barreling down the road. You add 10,000 cars to this mixture and it is sure to be a death trap.

R2 Would you want your loved ones driving this road? I don't think so. Who will be responsible when people are killed on this roadway? Cal Trans? It will be your fault for allowing casino traffic to use an already "F" rated scenic highway for access.

R3 It is completely unacceptable that Cal Trans, who is paid through our taxes, is willing to take the wants of a few people (who do not pay taxes) above the needs of the tax paying citizens of Jamul. It has been proven time and again that the majority of Jamul is against this casino being built due to the already unsafe roads we deal with now.

(Optional information, please print)

Name: Vicki Beers

Organization:

Address: 13805 Lyons Valley Rd, Jamul

Phone: E-mail:

How did you hear about this meeting? mailer

Written comments may be submitted by e-mail to: SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

R1 With regards to the intersection of SR-94 and Lyons Valley Road, the installation of the traffic signal at this intersection was included in the Final EIR (see Final EIR Section 1.0). This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual (See Final EIR Sections 1.4.1, 2.1-2.20, 3.3 and Chapter 5.0). The installation of the traffic signal at the intersection of Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

The installation of the traffic signal would allow vehicles traveling in the eastbound direction to make either a U-turn at the intersection of Lyons Valley Road to then travel westbound toward Vista Diego Road or for them to turn right onto Indians Spring Drive to then turn left from Indians Spring Drive toward Vista Diego Road. Therefore, access is improved to this intersection from SR-94.

R2 The Proposed Project does not generate traffic from the JIV gaming facility. Please see RTC B1, B2 and C1.

R3 Please see RTC C1.

COMMENTS

From: Vicki Beers
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Objection to allowing JIV to access Highway 94
Date: Wednesday, August 26, 2015 12:26:55 PM
Attachments: SKMBT_C22015082612140.pdf

R4 Please see attached letters of objection. It is important that Cal Trans recognize that they are here to make sure the community members are safe using the roads. Their obligations are to the citizens of the State of California, not to a sovereign nation. There is absolutely NO way to mitigate the issues. How many lawsuits will you be involved in if you allow this road use by JIV when innocent people die due to unsafe road issues.

The following people would like their names registered in opposition to JIV having access to Highway 94:

Vicki Beers
Don Beers
Chris Beers
Amber Beers-Puyear
Sean Puyear
Tessa Puyear
Josie Puyear
Danielle Wilson
Mitch Wilson
Lilly Wilson
Nancy Smith
William Smith
Deborah Wermers
James O'Krey
Jill Tatman
Larry Tatman
Carol Jeffers
Joe Jeffers
Jill Williamson
Wylie Williamson
Alma Pigeon
Tom Pigeon
Andrea Tallman
Brian Tallman
Marcia Binkert
Richard Binkert
Marsella Stadille
Harry Stadille
Tara Hollis
Tim Hollis
Beau Hollis
Sarah Hollis
Suzie Winkler
Steve Bass
Edward Clement Sr.
Pam Griffin
Rick Griffin
Peggy Sayles
Carrie Witte
Don Witte
Mindy Toretto
Tony Torreto
Loren Johnson
Amber Hall
Joshua Ammon
Anthony Lazarte
Michael Puyear

RESPONSES

R4 Please see RTC L1 regarding roadway safety, and RTC K5 regarding mitigation.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date:

Comment: We the below signers agree to the following statement

S1 Caltrans should Not allow access to Highway 94/Campo Rd for the JIV Casino project. They do not even have a gaming license. Highway 94 is already an "F" rated highway and cannot take additional cars on a daily basis. Residents already deal with unsafe access to private roads.

S2 Driving our children to the Preschool crossing 94 is like taking your life in your hands each time. What can CalTrans be thinking? Or who is paying for these unsafe conditions to happen? This traffic addition will cause deadly accidents. Do you want that on your conscience?

Think of the communities safety - Not the money issues of a souverign nation.

(Optional information, please print.)

Name: Amber Beers-Puyear, Sean Puyear, Danielle Wilson,

Organization: Mitch Wilson, Chris B, Edward Clement,

Address: Suzie Winkler, Steve Bass, Emily Architekta, Terri Sykstich

Phone: E-mail:

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

S1 Please see RTC B1 and B2.

S2 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: AUGUST 5 2015

T1 Comment: I SEE NO IMPROVEMENTS IN THIS PROJECT. THIS IS JUST A PROJECT FOR PENN NATIONAL TO GET ACCESS TO SR-94. THIS PROJECT HAS NO CONCERN FOR THE PEOPLE WHO LIVE + DRIVE SR-94 DAILY. ONLY FOR PENN NATIONAL + CALTRANS TO LINE THEIR POCKETS.

T2 CALTRANS NEEDS TO DO A TRUE TRAFFIC STUDY

THE ONLY IMPROVEMENTS IS TO GET AS MUCH TRAFFIC TO PENN NATIONAL GAMING FACILITY AS POSSIBLE

(Optional information, please print.)

Name MARK BENDE

Organization JAMUL FOR A SAFE SR 94

Address

Phone E-mail VISEGRIPUSA@COX.NET

How did you hear about this meeting? JAC

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

T1 The gaming facility currently under construction is not the Proposed Project and Caltrans has no authority over its construction or operation. Please see RTC B1, B2 and C1. The Proposed Project would not generate additional traffic, but will ameliorate traffic impacts and improve traffic movement.

T2 A comprehensive traffic analysis prepared for the Proposed Project is included in the Final EIR (see EIR Section 2.4). The traffic analysis followed the Caltrans Guide for the Preparation of Traffic Impact Studies, dated December 2002, which is accepted guidance. Per the guidelines outlined in this document, all intersections and roadway segments where the project would make modifications were analyzed in detail using the methodology and criteria stated in Caltrans' guidelines. In addition, those intersections and roadway segments outside of Caltrans' jurisdiction which are within the County of San Diego's area were analyzed with the same level of detail as outlined in the County of San Diego's Report Format & Content Requirements – Transportation and Traffic, dated August 24, 2011.

COMMENTS	RESPONSES

94 SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-15

U1 Comment: I don't see any thing about Proctor Valley Rd. when Traffic is so bad on 94. People will use Proctor Valley Rd as an alternative + otay lakes Rd. Proctor Valley Ends + turns to dirt + its only 4 miles to Chula Vista. You dont think people will use that as an alternative for 94.

U2 IT sure is funny how all these intersections have had these problems for years - But we were all told it was not cost "effective" to make any improvements - Funny how now you are looking at these problems. - money in your pocket thats why

(Optional information, please print.)

Name: Diane Bender

Organization:

Address: Proctor Valley Rd

Phone: E-mail: visegripusa@cox.net

How did you hear about this meeting? The Wonderful JAC

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA 92110

U1 The Final TEE prepared by the JIV gaming facility identified the need for permanent improvements to the State Highway System. Caltrans has prepared this CEQA Final EIR for the improvements within the State right of way.

Improvements at the intersection of Proctor Valley Road and SR-94 were not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR. Please see RTC H5 and C1.

U2 The JIV gaming facility is not the Proposed Project. Please see RTC B1 and RTC C1.

COMMENTS	RESPONSES
From: Dan Rillo (President) **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** SR-94 **Date:** Thursday, August 27, 2015 3:35:42 PM V1 I've only lived in Jamal for 2 years, what I didn't realize before buying a home here was the traffic and how dangerous the SR-94 is. I do believe you have moral and ethical obligations to widen and separate (barrier) the west and east bound lanes. Have you seen the "pray for me, I drive the 94"? It needs to be fixed! Thanks, Dan WEB: http://www.diysolardepot.com EMAIL: Dan@DIYsolarDepot.com PHONE: 619-339-6216	V1 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
From: kbobczynski@aol.com **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Highway 94 **Date:** Thursday, August 27, 2015 3:17:02 PM Dear David, W1 I, Karen Bobczynski, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. The traffic on the Highway 94 is already overwhelmed with cars. Unless there are plans to make it a four lane highway, your plans will not provide the necessary improvements necessary to keep traffic flowing and to provide safety to our children and parents driving to school. I really can't believe why this was ever approved in the first place. One very disgruntled neighbor and taxpayer. Karen Bobczynski	W1 Please see RTC L1, B1 and K5.

COMMENTS	RESPONSES
From: Tom Bobczynski **To:** 58-94_58_94_Draft_EIR@DOT **Date:** Thursday, August 27, 2015 10:49:19 AM **Attachments:** image001.emz image002.png X1 I ,tom bobczynski _____ want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Tom Bobczynski tbobczynski@rancholapuerta.com www.rancholapuerta.com Rancho La Puerta Promotions	X1 Please see RTC K5.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date:

Comment: IT'S A TERRIBLE, TERRIBLE NIGHTMARE.

THE MONEY SPENT, THE LACK OF DEMOCRACY, PUBLIC GOOD, COMMUNITY IS ASTOUNDING.

Y1 THE AMOUNT OF TIME IT WILL ADD TO OUR TRAVEL TO WORK ON THE ADVANT IS ASTOUNDING — THESE RUNS EFFECTIVELY MAKE OUR HOME 20 MINUTES OR HALF AN HOUR FURTHER FROM SCHOOLS + HOSPITALS

Y2 THE ABUSE OF WILD LANDS — THE REASONS FOR DOING IT, THE HOURS AND HOURS OF TRAFFIC JAMS THE CASINO AND THESE TRAFFIC + TRANSPORTATION CONSTRUCTION CONTINUE YOU'LL TAKE.... WE HAVE ALREADY PUT UP WITH THAT UNNECESSARY REPAVING

(Optional information, please print.)

Name ROBIN BRATSFORD

Organization

Address 1116 MARRON VALLEY ROAD DULZURA 91917

Phone E-mail ROBINBRATSFORD@YAHOO.COM

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

OVER →

Y1 Please see response C1.

Y2 The gaming facility currently under construction is not the Proposed Project. Please see RTC B1, RTC C1. The Proposed Project does not add vehicle trips. As explained in the SR-94 Improvement Project Final EIR (Section 2.4.3), the SR-94 Improvements do not generate operational vehicle trips.

COMMENTS	RESPONSES
✓ WE DO NOT WANT IT ✓ WE DO NOT NEED IT. WE ARE VEHEMENTLY OPPOSED TO THE CASINO AND (ANY) OF THESE TRAFFIC PROPOSALS ✓ WHAT HAPPENS WHEN THE CASINO IS SHUT DOWN, AND WE ARE STUCK WITH ALL THESE TRAFFIC DELAYS WE DID NOT WANT AND DID NOT NEED. ✓ IF AND WHEN THE CASINO FAILS — WILL ALL THESE "IMPROVEMENTS" BE TAKEN OUT?!	

COMMENTS

Preston Brown

2949 Lyons Creek Lane
Jamul, Ca 91935

August 27, 2015

David Nagy
Environmental Branch Chief
California Department of Transportation District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

Dear Mr. Nagy::

Z1

I have previously commented in writing at the Presentation Event at the Cottonwood Golf Club in Rancho San Diego. The study is incomplete. It omits the solutions that are necessary for the intersection of SR 94 and Otay Lakes Road. Numerous graphs and charts for traffic studies are a start but the plan defers any real solutions because there is 2035 Horizon goal in place. And this does nothing to react to the immediate impending problem of the increase of traffic from the south bay to the casino.

This is an extraordinarily dangerous intersection. The statistics on deaths and accidents at this intersection are not analyzed with the potential impact of an additional estimated 2-3,000 vehicles trips per day to an entertainment venue with 24 hour alcohol use. In the 1990's The Daley Quarry project was fully reviewed and examined for the danger that trucks hauling rocks might pose for motorists and motorcycles and bicyclist. Full realistic consideration has not been given to this intersection which handles a rich confluence of traffic and types of users.

If Otay Lakes Road were added as new entrance road to SR 94 it would fail in all respects of Caltrans guidelines for sight lines and elevation and direction changes. It is irresponsible to not to assign the responsibilities of the impacts on this intersection directly to the casino project that will be overloading it with its increased traffic users. A much more extensive improvement plan is need for this intersection that the JIV should bear responsibility for.

Sincerely yours,

Preston Brown

RESPONSES

Z1 The Proposed Project consists of transportation improvements and will not adversely affect Otay Lakes Road. Please see RTC B1, B2 and C1.

COMMENTS	RESPONSES
cc: Supervisor Dianne Jacob Mark Wardlaw, Director PDS County of San Diego Eric Lardy, County of San Diego Congressman Duncan D. Hunter Congressman Juan Vargas Senator Dianne Feinstein Governor Jerry Brown Joginder Dhillon, Senior Advisor to Governor Assemblyman Brian Jones State Senator Joel Anderson Laurie Berman, Caltrans District Director Bill Figge, Caltrans Assistant Director Chi Vargas, Caltrans Advance Planning	

COMMENTS	RESPONSES
Z2	Z2 Please see RTC J1. The Final EIR does not rely on JIV's Final TEE to satisfy any of CEQA's procedural or substantive requirements concerning the SR-94 Improvement Project. The Final EIR represents Caltrans' independent judgment and the detailed analyses referenced therein were undertaken with Caltrans' supervision. The Final TEE is but one of many of the EIR's reference documents (see Appendix J to the Final EIR). Also, the Final EIR does not rely on the JIV Final TEE. The Final EIR does reference the JIV Final TEE and the 1999 Tribal-State Gaming Compact to describe the background of the JIV gaming facility and explain that the Tribe proposed the SR-94 Improvement Project to Caltrans and in doing so is complying with its obligation under the Compact to make good faith efforts to implement the mitigation measures identified in the Final TEE.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: Aug 5 2015

Comment: The intersection on SR 94, at Honey Springs Rd and OTAY Lakes Rd. is completely ignored in this study for traffic impacts from the "proposed" casino.

It is a very dangerous section of 94 now under current use ~~of a~~ by a variety of users: commercial, commuting, recreation, international travel, bicycle, tourists, motorcycle Rallys.

The Casino will add, thousands of trips each day from the south, bay, Chula Vista and National City. The previous developer LAKES Gaming allocated 25% of the 10,000 estimated car trips a day from National the 4th developer has completely omitted this reality. 15% were allocated to Reston Valley Rd. This has also been ignored.

The reality is that customers will come from the south bay and use OTAY Lakes Rd. (over)

(Optional information; please print.)

Name: Preston Brown

Organization: JDPCG.

Address:

Phone:

E-mail: brown.preston@gmail.com

How did you hear about this meeting? Notified by mail

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
Z2 cont. Tremendous stress of elevated use will be put on this intersection and this stretch of 94 for the Casino site. The "Ready Kit" Study should include this stretch of Road. It does not. The Impact Study is totally flawed by Jon Caltrans has only relied on what Pena Gaming has ~~been~~ offered as fact. and their opinion of areas impacted on SR 94. The Reality cannot be ignored. This will fall back on Caltrans in the future to pay for Improvements to this Intersection	

COMMENTS

Message body

David Nagy, environmental branch chief

AA 1

I'm sure you are aware of the flawed SR-94 draft proposed by Caltrans supposedly " mitigating" the dangerous traffic issues that will result if the proposed illegal casino project goes to completion in the once rural community of Jamul.

The mitigation falls completely short of any improvements for safety issues, nor does it address all the neighboring side streets; Las Palmas, Hillside, Vista Diego, Indian Springs, vista Sage, Rancho Miguel, and most importantly Cougar Canyon at Steele Canyon HS(already a major and dangerous traffic mess). Nor have they addressed other important intersections South of the project at Otay Lakes Rd., Honey Springs Rd. and Rancho Jamul. Not to mention obvious construction parking issues that will disasterously affect local businesses.

The State of California, Co. of San Diego and Caltrans have all turned their backs on Jamul and have not required CEQA, permits or followed protocols required for any other residential or commercial project in the Co. of San Diego. Why is that?

People will die on this road due the ineptness county and state agencies. It will be on you! Hope you can sleep at night.

davebuller@Hotmail.com

RESPONSES

AA 1 The Proposed Project will not adversely affect the listed side streets or other roadways. The Project consists of transportation improvements. Please see RTC B1, B2 and C1.

COMMENTS	RESPONSES

From: Dave Buller
To: SR-94_SR_94_Draft_EIR@DOT
Subject: FW: SR-94 DRAFT
Date: Thursday, August 27, 2015 1:48:41 PM

From: davebuller@hotmail.com
To: eir@dot.ca.gov
Subject: SR-94 DRAFT
Date: Wed, 26 Aug 2015 15:24:56 -0700

David Nagy, environmental branch chief

AA 2 I'm sure you are aware of the flawed SR-94 draft proposed by Caltrans supposedly " mitigating" the dangerous traffic issues that will result if the proposed illegal casino project goes to completion in the once rural community of Jamul.

AA 3 The mitigation falls completely short of any improvements for safety issues, nor does it address all the neighboring side streets; Las Palmas, Hillside, Vista Diego, Indian Springs, vista Sage, Rancho Miguel, and most importantly Cougar Canyon at Steele Canyon HS(already a major and dangerous traffic mess). Nor have they addressed other important intersections South of the project at Otay Lakes Rd., Honey Springs Rd. and Rancho Jamul. Not to mention obvious construction parking issues that will disasterously affect local businesses.

AA 4 The State of California, Co. of San Diego and Caltrans have all turned their backs on Jamul and have not required CEQA, permits or followed protocols required for any other residential or commercial project in the Co. of San Diego. Why is that?

People will die on this road due the ineptness county and state agencies. It will be on you! Hope you can sleep at night.

davebuller@Hotmail.com

AA 2 Please see RTC B1.

AA 3 The Proposed Project consists of traffic improvement measures that were identified in the Final TEE for the JIV gaming facility. Please see also RTC B1, B2 and C1.

AA 4 Caltrans is the Lead Agency for the CEQA document on the SR-94 Project. Also, please see RTC B1.

COMMENTS

From: Sharona Canales
To: SR-94_SR_94_Draft_EIR@DOT
Date: Wednesday, August 26, 2015 10:04:44 AM

BB 1 I, Sharona Canales, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

BB 2 I am very concerned about the impact to the community with safety my primary concern. I do not think that it adequately addresses the potential consequences. I especially do not understand how the taxpayers will re responsible for the costs after all the expense and hassle of the recent resurfacing of highway 94.

BB 3 Where is the citizens of the community's voice in this proposal? We are not a statistic!

BB 4 Sincerely

Sharona Canales

RESPONSES

BB 1 Please see RTC K5.

BB 2 Please see RTC L1.

BB 3 The JIV would be responsible for planning, construction and support costs of the SR-94 Improvements, should the Project be approved by Caltrans.

BB 4 Chapter 6.0 of the Final EIR documents the consultation and coordination efforts undertaken by Caltrans for the SR-94 Improvement Project. Public comments were solicited during the public scoping process at the beginning of the process, and during the Draft EIR public review period. Additionally, Project Development Team meetings, which included members from agencies and the public, were held during the drafting of the Final EIR.

COMMENTS	RESPONSES
CC 1 From: Miary Cardenas To: SR94_SR_94_Draft_EIR@DOT Subject: SR 94 proposed mitigation Date: Thursday, August 27, 2015 9:07:08 PM David Nagy< Environmental Branch Chief, I Michelle R Cardenas want to go on record that the Caltrans CEQA is a flawed.biased document,which does not address all the mitigation necessary to ensure the public's safety along highway 94 stretching from Tacate to Ranch San Diego.What about Otay Lakes rd< Honey Springs rd, And all the other roads stretching east to Tacate? Caltrans has failed the people. Michelle R Cardenas	CC 1 Please see RTC K5.

COMMENTS	RESPONSES
From: Mary Cruz **To:** SR94_SR_94_Draft_EIR@DOT **Subject:** NO **Date:** Wednesday, August 26, 2015 9:34:08 AM DD 1 We, Edward and Mary Cruz, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. As residents of Jamul for over 40 years we have lived with the already inadequate roads, we know and you know that the reason for this outrageous project is strictly for out-of-State financial interests not for the California tax payers that live in this area. We already have to time our trips to town to avoid congestion by residents going and coming from work, as a bedroom community that is workable. However, modifying roadways to accommodate out of State financial groups while not addressing the impact that their additional traffic will cause on our schools, residents and businesses is irresponsible and in our mind criminal especially when as tax payers we're stuck with the bill. Who ever started this rock rolling down hill needs to put a stop to it NOW - your engineers, figure it out. Thank you, Edward and Mary Cruz, 15517 Lyons Valley Road, Jamul, CALIFORNIA. DD 2	DD 1 Please see RTC K5 with regards to not addressing all the mitigation needed. DD 2 Please see RTC AA3.

COMMENTS	RESPONSES

From: melandjack@cox.net
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Comments on improvement proposal to SR 94
Date: Wednesday, August 26, 2015 12:53:52 PM

August 26, 2015

Melanie D. Davis (melandjack@cox.net)
2920 Pioneer Way
Jamul, CA 91935

To: David Nagy, Environmental Branch Chief
SR-94_SR_94_Draft_EIR@dot.ca.gov

Comments for Proposed SR 94 Improvement Project:

I have many concerns about the Caltrans mitigation proposals for this project.

EE 1 • Looking at the proposals, I do not see mitigation for the entry/exit to/from Vista Sage, a feeder street to SR 94? My daughter was in a fatal accident in 2002 near that intersection. If Caltrans has determined a need to make improvements, it must be due to traffic increase. Then why did you fail to offer mitigation to this feeder street?

EE 2 • In addition, with increasing traffic, travelers passing Steele Canyon High School in the morning and afternoons are going to be impacted. Where is the mitigation for this bottleneck?

EE 3 • As more traffic accesses our route SR 94 from Mexico/Chula Vista via Otay Lakes Road, it again seems logical that mitigation be proposed at the intersection of Otay Lakes Road and SR 94. You have nothing proposed for this intersection.

EE 4 Improvements should remedy problem areas. Recent improvements to Highway 94 were made at a taxpayer cost of $14. But what is driving this latest proposal? Where is the traffic going to come from? You must have determined the JIV Casino will bring most of the increased traffic. But the Caltrans mission is to insure the safety of all Californians. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. How is it legal for construction to begin on a project before proper mitigation has been put in place?

EE 5

EE 6 I am at a loss when attempting to find justification for this flawed project. Can you explain how Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million? And without a CEQA? How is this being funded and by whose authority? Since the primary growth in the area will be due to the Jamul Casino, is the JIV picking up the cost of another re-surfacing?

EE 7 I, Melanie D. Davis want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

EE 1 Please see RTC AA3.

EE 2 Please see RTC AA3.

EE 3 Please see RTC AA3

EE 4 Please see RTC AA3.

EE 5 Please see RTC B1 and AA3.

EE 6 The commenter is referring to SDG&E improvements, which is a separate permit and is being undertaken for the JIV Gaming Facility, not the SR-94 Improvement Project. CEQA was complied with on the this separate project, and JIV is funding that project. With regards to the separate JIV Gaming Facility, please see RTC B1.

EE 7 Please see RTC K5.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8.5.2015

Comment:

FF 1 Not Mitigated ... YET: Hwy 94 @ Vista Sage Lane (VSL). VSL is at one end of the stretch of 94 (Steele Canyon to VSL) which has had 10 fatalities since _____. The high school drop-off traffic backs up in the mornings (when school is in session) almost to the Caltrans building between Steele Canyon and VSL. Please do something so that left-hand turns from and into VSL are safely possible.

FF 2

FF 3 Not mitigated ... YET: The compound intersection at Honey Springs & Otay Lakes Road. This intersection includes a blind curve on 94 just South of Otay Lakes Rd. Otay Lakes Rd & Hwy 94 (from the south) will be used by residents of:
Chula Vista - population 250K+ (2013)
Tijuana - population 1.3 million (2010)
Otay Mesa - " 13K+ (2010)
Imperial Beach " 26K+ (2010)
to get to the "casino". No mitigation! How many car trips does it take to get mitigation

FF 4 Not mitigation - Pio Pico - campground is on 2 sides of Otay Lakes Rd. How safe is that with

(Optional information, please print.)

Name Cynthia Evans

Organization Vista Sage Lane resident

Address 13589 Vista Sage Ln

Phone 619 669 7263 E-mail c91935@yahoo.com

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

FF 1 Improvements at the intersection of Vista Sage and SR-94 were not included within the project description or evaluated under this Final EIR, since improvements to this intersection were not included as part of the improvements derived from the analysis included in the Final Tribal Enviromental Evaluation prepared for the JIV gaming facility (Final Tribal EE, 2013), as mitigation measures for the JIV Gaming project's direct traffic related impacts.

FF 2 Improvements at the intersection of Cougar Canyon Road and SR-94 were not included within the project description or evaluated under this Final EIR, since improvements to this intersection were not included as part of the improvements derived from the analysis included in the Final Tribal Enviromental Evaluation prepared for the JIV gaming facility (Final Tribal EE, 2013), as mitigation measures for the JIV Gaming project's direct traffic related impacts.

FF 3 Improvements at the intersections of Honey Springs/Otay Lakes Road or SR-94/Otay Lakes Road were not included within the Project description or evaluated under this Final EIR, since improvements to these intersections were not included as part of the improvements derived from the analysis included in the Final TEE prepared for the JIV gaming facility (Final Tribal EE, 2013), as mitigation measures for the JIV gaming facility's direct traffic related impacts. Please see RTC III1.

FF 4 Improvements at the intersection of Pio Pico Campgrounds entrances and Otay Lakes Road were not included within the Project description or evaluated under this Final EIR, since improvements to this intersection were not included as part of the improvements derived from the analysis included in the Final TEE prepared for the JIV gaming facility (Final Tribal EE, 2013), as mitigation measures for the JIV gaming facility's direct traffic related impacts. Please see RTC III1.

COMMENTS	RESPONSES
GG 1	GG 1 Please see RTC B1, B2 and C1. The Proposed Project would not generate additional traffic, but will ameliorate traffic impacts and improve traffic movement.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-15

Comment: THIS PROJECT WILL CAUSE MANY DEATH'S. I TALKED TO MULTIPAL ENGINEER'S AND NONE HAS A SOLUTION. THE IS A TRAFFIC HAZARD WAITING TO HAPPEN. CAL-TRANS IS PUTTING OUR COMMUNITY AT RISK BY ALLOWING ACCESS ON TO 94. YOU (CAL-TRANS) HAVE BEEN MADE AWARE OF A TRAFFIC HAZARD.

(Optional information, please print.)

Name WILLIAM R. FAIR

Organization RESIDENT OF JAMUL FOR OVER 40 YRS.

Address 13518 PROCTOR VLY. RD. JAMUL

Phone 619-669-0421 E-mail bafair@COX.NET

How did you hear about this meeting? JAC.

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS

From: Josan Feathers
To: SR-94_SR_94_Draft_EIR@DOT
Cc: "Karibia Baillargeon"; "Mark Schuppert"; chrisrand.vdo@gmail.com; lori.myers.vdo@cox.net
Subject: Valle De Oro Community Planning Group response
Date: Thursday, August 27, 2015 4:56:39 PM

Mr. Nagy,

HH 1

I reviewed the SR-94 Draft EIR for our Valle De Oro Community Planning Group. The only "improvements" within our CPG area are:

1. The Jamacha Blvd and Campo Rd (SR-94) intersection where the northbound left-turn lane on Jamacha Boulevard would be restriped for a section of 1,400 feet approaching the intersection of SR-94 to become a through-shared-left-turn lane (combination left turn and straight lane). The northbound through-shared-left-turn lane would be restriped to become a second right-turn lane. Therefore, there are no impacts there.

2. The Jamacha Road and Campo Rd (SR-94) intersection where a second eastbound right-turn lane would be added to SR-94, which would require widening the south side of SR-94 by 12 feet for a length of 530 feet. The construction of a retaining wall is anticipated to support the additional roadway width. Also, reconstruction of the northbound median to provide left-turn storage capacity for the northbound left-turn movement. The median taper would be reduced to provide the additional storage while maintaining the left-turn storage for southbound left-turns into Rancho San Diego Town Center. Lastly, the proposed improvements include modifications to the existing traffic signal, including relocation of signal poles on the southwest corner of the intersection.

HH 2

My concerns here are with the impacts to the San Diego County Restoration area and the impacts to the waters of the US due to the construction of the retaining wall in the channelized stream called "Jamacha Channel," which contains southern willow riparian scrub and some coastal and valley freshwater marsh vegetation communities. The impact to the Jamacha Channel and riparian habitat is considered a significant impact. The avoidance, minimization and/or mitigation measures listed in Section 2.17.4 would reduce the impact to a less-than-significant level.

HH 3

Also, I hope the construction noise will be attenuated for the threatened and endangered species in the area.

HH 4

Also, I trust there will still be left-turn storage for southbound left-turns into Rancho San Diego Town Center at a signalized intersection (perhaps further up the road by the YMCA?) If we were to oppose either of these modified intersections, the end result would be increased congestion. The anticipated traffic volumes are huge.

Therefore, I recommend approval of the proposed changes to these 2 intersections. Thank you.

Sincerely,
Jösan Feathers, P.E.
Member of the Valle De Oro Community Planning Group
619.660.2915

RESPONSES

HH 1 Thank you for your comment.

HH 2 Commenter expressed concerns about the impacts to the County restoration area and the impacts to waters of the U.S. due to implementation of the SR-94/Jamacha Road improvement project. Various mitigation measures will be implemented to reduce these impacts to a less-than-significant level (see Final EIR Section 2.17.4). Impacts were avoided or minimized by designing the project to have the smallest development footprint. This consisted of installing a retaining wall instead of extending the existing culvert and filling the channel. The retaining wall allows the majority of the channel to remain intact. Compensation measures include the restoration of channel banks that will be temporarily disturbed during construction and the preservation of habitat on lands outside of the project area for the permanent loss of habitat within the project area.

HH 3 Caltrans' Standard Measures for construction noise abatement will be implemented (see Final EIR Section 14.4); these include fitting vehicles and equipment with mufflers, placing staging areas in proper locations, minimizing usage of internal combustion engines for power supply, and limiting construction activities to appropriate daytime periods.

HH 4 The proposed intersection and roadway segment improvements included in the Final EIR will not shorten the existing left-turn storage for the intersection of the Rancho San Diego Towne Center near the YMCA.

COMMENTS

August 27, 2015

Mr. David L. Nagy
Department of Transportation
State of California
District 11, Environmental Div. MS 242
4050 Taylor Street
San Diego, CA 92110

Re: Draft EIR for the SR-94 Improvement Program

Dear Mr. Nagy:

II1 I am writing with a comment on the Draft EIR for the SR-94 Improvement Program. The Draft EIR does a good job of analyzing and weighing the impacts of the road options being considered as mitigation associated with the Jamul casino. The option of Daisy Drive for primary casino access seems to be the best choice and have the fewest environmental impacts. As long as State Route 94 is being improved along this corridor to improve traffic, perhaps Caltrans should

II2 also consider establishing a park and ride facility in conjunction with these road improvements. A park and ride lot could help get commuters out of their cars in favor of using bus service or carpools. It would result in further environmental benefits. Thank you for considering this idea.

Sincerely,

Laura Flores
19540 Elena Lane, Jamul, CA 91935

6481000_1

RESPONSES

II1 Thank you for your comment.

II2 Thank you, your comment has been forwarded to our Planning Division for future consideration.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 05 AUG 2015

JJ 1 Comment: While I appreciated Caltrans and their wonderful display and willingness to answer questions, I found it rather insulting that the other half of the equation deemed a public forum to be beneath them and sent no representatives.

JJ 2 The commitment to safety for the community is commendable but what was supposed to be an interactive community meeting turned out to be a Caltrans show and tell of all information that is already available on the websites.

Concerns regarding legality and environmental impact were only partially fielded from the specific perspective of Caltrans. This meeting failed the public, and failed the law-abiding, environmentally conscious community which will have to live with the terrible negative impact of this scenario.

JJ 3 All of the improvements presented here today are, though necessary, entirely inadequate for the safety of the local school, junction, and community in general.

(Optional information, please print.)

Name: Daniel E. Floyd

Organization:

Address:

Phone: 619 792 6951 E-mail: floyddannyboy@gmail.com

How did you hear about this meeting? a last minute email, 3 hours beforehand, from a neighbor

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

JJ 1 Caltrans is the CEQA Lead Agency and the entity that is responsible for the public meeting, and for producing the Final EIR. The JIV is not required to participate in the public meeting.

JJ 2 Caltrans duly held a public hearing on the Project Final EIR and received comments from members of the public on that document. Additionally, Caltrans held Project Development Team meetings, which provided an additional forum to present project information and for the community to be heard.

JJ 3 Please see RTC L1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/2015

Comment:

KK 1
* SR-94 IS A NARROW, WINDING AND UNEVEN ROAD.
* SR-94 has PROVEN TO BE A DANGEROUS ROAD WITH TOO MANY ACCIDENTS

KK 2
* THE CASINO WILL BRING IN SIGNIFICANTLY GREATER NUMBER OF CARS + TRUCKS

KK 3
* PASSING OTHER VEHICLES IS PRESENTLY VERY DANGEROUS, ONLY TO GET WORSE WITH THE ASSURED INCREASE IN TRAFFIC

KK 4
* STEEL CANYON HIGH SCHOOL IS VERY BUSY WITH TRAFFIC ON SR-94.
* HIGH SCHOOL STUDENTS ARE TYPICALLY DRIVERS THAT ARE PRONE TO LESS THAN OPTIMUM DRIVING TECHNIQUES.
* THE ADDITIONAL TRAFFIC WILL NEGATIVELY IMPACT DRIVING BY OUR YOUNG STUDENTS.

KK 5
* MANY STUDENTS WALK OR RIDE BIKES TO STEEL CANYON HIGH SCHOOL AND ARE IN GREATER DANGER SECONDARY TO INCREASED TRAFFIC

(Optional information, please print.)

Name: DANIEL L. FLOYD

Organization: SELF

Address: 1568 Corte de Los Piedras

Phone: 619 579 5857 E-mail: Floydsinsd2@GMAIL.COM

How did you hear about this meeting? E-MAIL

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

KK 1 The Proposed Project does not add vehicle trips. As explained in the SR-94 Improvement Project Final EIR at Section 2.4.3 (page 2.4-12), the SR-94 Improvements do not generate operational vehicle trips. The Proposed Project will ameliorate traffic impacts and improve traffic movement. Please see RTC B1 and C1.

KK 2 Please see KK1.

KK 3 Please see KK1.

KK 4 Please see KK1.

KK 5 Please see KK1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-2015

Comment:

LL 1 Jamul Indian Tribe? Are they truly a tribe? If so - why would they build on their ancestors? Right on The Grade!
Rules & Regulations apply to us. Why not to them?
I Can not do anything I want on my own land!

LL 2 Hwy 94 is very dangerous. Those huge trucks Can't even stay in their lanes!

LL 3 Gaming food & Beverage. A great Combination for a winding, 2 Lane Hwy!
Have you Considered the amount of Traffic on Willow Glen - the bus & Car traffic going & coming to Sycuan?
We Rarely see Hwy Patrol on That road!

LL 4 The impact to this area in Jamul would be devistating! How Can this be a Consideration?

(Optional information, please print.)

Name S. Floyd

Organization Self

Address

Phone E-mail

How did you hear about this meeting? Email - Same day!

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

LL 1	Caltrans has no authority over the construction or operation of the gaming facility on JIV's sovereign lands. Please see RTC B1, B2 and C1.
LL 2	Please RTC L1.
LL 3	Please see RTC J1.
LL 4	Please see RTC J1.

COMMENTS	RESPONSES
August 17, 2015 Vernon A. Fry,DDS, MSD, (Retired) 3250 Via Las Faldas Jamul CA 91935 Mr. David Nagy, Chief Environmental Analysis, Branch B California Department of Transportation, District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 Re: Comment on SR 94 Draft EIR as viewed at public hearing held August 5, 2015 Dear Mr. Nagy, I attended the public hearing for the SR 94 Draft EIR held August 5, 2015, carefully read the handout document, 'Frequently Asked questions', viewed the displays with posted explanations, asked questions of the available Caltran's Staff and have quickly reached the following conclusion:	
MM 1 **That the proposed mitigation plan falls completely short of any real improvements for safely moving traffic and therefore is a total failure & provides no mitigation at all to the expected 9,000 daily increase in vehicle traffic volume generated by the future planned opening of the Indian Gambling Casino!**	MM 1 Please see RTC B1.
MM 2 **The additional turn lanes added at the Campo Road (SR-94) and Jamacha Junction are in effect simply temporary parking lots because you have ignored the major choke point of the two lane bridge and the Steele Canyon-High school turn lanes. To state that the above mentioned mitigation failure was preexisting is false when you consider the sudden and massive 9,000 daily increase in traffic volume created by the planned opening of the Indian Casino. And besides, under whose supervision were the two lane bridge to replace the failing historic steel bridge and the access to the newly constructed Steele Canyon High-school created?**	MM 2 Please see RTC H4 regarding the improvements at the SR-94/ Jamacha Road intersection. Please see also RTC B1, B2 and C1 concerning the JIV gaming facility.
MM 3 **The proposed mitigation plan also fails to address all the neighboring side streets; Las Palmas, Hillside, Vista Diego, Indian Springs, Vista Sage, Via Las Faldas, Rancho Miguel, Miller Ranch Rd (critical access to Mt. Miguel's broadcast towers and the county emergency repeaters) and completely ignore the traffic generated from Otay Lakes Road and numerous unnamed private streets and driveways; all will be severely and adversely impacted by the 9,000 daily increase in traffic volume generated by the future opening of the Indian Gambling Casino now under construction.**	MM 3 The Proposed Project will not adversely affect the listed side streets or other roadways. The Project consists of transportation improvements. Please see RTC B1, B2 and C1.
MM 4 **On a broader and more critical issue The Jamul Indian Village has never presented one shred of evidence that they are eligible to receive a federally sanctioned gaming compact. The State of California and Caltrans have taken the position that they are not required to confirm the**	MM 4 The comment is focused on the issue of the 1999 Tribal-State Gaming Compact, which is not an element of the Proposed Project.

COMMENTS	RESPONSES
MM 5 eligibility of those seeking gaming compacts; may I then ask: who is required to confirm the question of eligibility? As you are most certainly aware the question of eligibility will be answered in the Courts and when the ruling that The Jamul Indian Village is not eligible for a gaming compact is handed down by the Courts can you grasp the harm that has already occurred to the environment and the residents of Jamul as a result of the construction of an enormous multistory gambling casino illegally sanctioned by the State of California and Caltrans!? I HUMBLY SUBMIT THAT YOU HAVE PLACED THE CART BEFORE THE HORSE! Sincerely, *Vernon A. Fry* Vernon A. Fry, DDS, MSD, Retired 1 enclosure: I have included for your review 'Caltran's Published Statement' Mission, Vision, Goals, Values MISSION VISION GOALS Safety and Health Stewardship and Efficiency Sustainability, Livability and Economy System Performance Organizational Excellence VALUES Integrity Commitment Teamwork Innovation	MM 5 Please see RTC MM4.

COMMENTS	RESPONSES
NN 1	Please see RTC JJ2.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/2015

Comment:

NN 1

THIS MEETING FORMAT IS VERY LACKING IN PUBLIC ACCESSIBILITY. THERE IS NO OPPORTUNITY TO LISTEN TO ANY QUESTIONS BY FELLOW CITIZENS THAT MAY NOTE OMISSIONS OR ERRORS IN THE DRAFT EIR

IT IS NOT IN THE INTEREST OF TRANSPARENCY OR PUBLIC INFORMATION TO SO CONTROL THE CALTRANS "MESSAGE" THAT PUBLIC COMMENT IN A PUBLIC VENUE IS VIRTUALLY ELIMINATED.

DEMOCRACY CAN BE MESSY, YES. IT IS THE NATURE OF THE INSTITUTION. THIS "MEETING" IS A FARCE IF THE INTENT WAS TO INFORM. IT DOES NOT INFORM. IT JUST PRESENTS CALTRANS' DID PERSPECTIVE EXCLUSIVELY AND ALLOWS FOR ABSOLUTELY NO PUBLIC DISCOURSE OR EDUCATION

SHAME ON YOU.

(Optional information, please print.)

Name KIMBERLY HAMILTON

Organization DEERHORN VALLEY COMMUNITY ASSOCIATION

Address 19580 ELENA LANE, JAMUL CA 91935

Phone 619 468-3218 E-mail KHAMILTO@MAC.COM

How did you hear about this meeting? JAMUL ACTION COMMITTEE

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
OO 1	OO 1 Please see RTC B1 and L1. Caltrans prepared this CEQA EIR for the improvements within the State right of way. Improvements at the SR-94/Vista Sage intersection were not identified, as this was not a location where the gaming facility would have a traffic related impact. The current configuration of Vista Sage Road and SR-94 includes warning signs to alert vehicles traveling along SR-94 that other vehicles may be turning in and out of Vista Sage Road. This is an existing condition that will not be significantly affected by the addition of the gaming facility traffic along SR-94.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-15

Comment: This is a travesty! I am not opposed to casinos, I am opposed to the excess traffic & eminent injuries & fatalities, especially at my Road, Vista Sage Lane. We have fought for years to get a turn lane at Vista Sage Lane since there have been numerous accidents but still nothing. When my daughter was in a serious accident at that street (not her fault), I was told "since it's not a death" it doesn't count. I hear from so many in Jamul that Vista Sage Lane is one of the most dangerous sections of 94, and that's without the excess traffic.

What can possibly be right about disrupting a perfectly happy community?! Shame on you!

(Optional information, please print.)

Name Angela Hanzal

Organization

Address 13569 Vista Sage Lane

Phone 619-669-0804 E-mail socialplanner1@cox.net

How did you hear about this meeting? email

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
PP 1	Please see RTC OO1.The improvements evaluated in the Final EIR include the installation of a traffic signal at the intersection of Lyons Valley Road and the widening of SR-94 at Steele Canyon Road to provide an additional eastbound and westbount travel lane in each direction.
PP 2	Please see RTC OO1.Improvements at the intersection of Vista Sage and SR-94 were not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment: I AM A HOMEOWNER THAT USES HWY 94 TO ACCESS VISTA SAGE LANE - I NOTICED THAT THERE ARE NO PLANS TO IMPROVE ANY OF THE HIGHWAY BETWEEN LYONS VALLEY RD AND STEEL CANYON RD.

FOR THE 42 PROPERTY OWNERS THAT LIVE ON OR NEAR VISTA SAGE LN. INGRESS + EGRESS WILL BE VIRTUALLY IMPOSSIBLE DUE TO THE ADDITIONAL AMOUNT OF VEHICLES THAT HAVE BEEN PROJECTED WITH THE NEW GAMING FACILITY.

WE HAVE ASKED FOR YEARS TO ADD A LEFT TURN LANE AT THE INTERSECTION OF HWY 94 + VISTA SAGE LN. CALTRANS CURRENTLY HAS ENOUGH ROOM TO MAKE THIS WORK.

THERE HAVE BEEN NUMEROUS ACCIDENTS AT THIS INTERSECTION.

PLEASE CONSIDER THIS REQUEST.

(Optional information, please print.)

Name: KIP HANTAL

Organization:

Address: 13569 VISTA SAGE LN.

Phone: 619-669-0804 E-mail: KIP HANTAL@YAHOO.COM

How did you hear about this meeting? EMAIL

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS

From: Nancy Harrelson
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Caltrans SR 94 Improvement Project
Date: Thursday, August 27, 2015 4:59:02 PM

QQ 1

QQ 2

Why is it that SR 94 can be closed in both directions for several hours today due to a fatality crash and it is not even listed in today's *Problem Areas*? Is it that Caltrans is invested in ignoring the problems on SR 94? Why is Caltrans only responsive to Jamul Indian Village and not to the residents of Jamul? I live on Vista Diego and can barely get into or out of there to SR 94 at the present time and with the present amount of traffic. The proposed light at Lyons Valley Road will exacerbate the problem. I cannot even think about an additional 9000 cars traveling in front of Vista Diego Road every day. Several properties have been for sale in our neighborhood for months and no one is interested because of the casino being built. Isn't Caltrans a government agency? I'm terribly confused and disillusioned about what is going on.

Nancy Harrelson
13789 Calle del Sol
Jamul, CA 91935

RESPONSES

QQ 1 Please see Final EIR Section 6.2 Public Scoping Process for public outreach employed by Caltrans during this CEQA process. All comments submitted are being considered in the decision making process.

QQ 2 The installation of the traffic signal at the intersection of SR-94 and Lyons Valley Road was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. Required stopping sight distance is one of the standards evaluated during the design and construction of the traffic signal. The design speed for SR-94 is 55 miles per hour. Per Caltrans Highway Design Manual, the minimum stopping sight distance for travel speeds of 55 miles per hour is 500 feet. The proposed new traffic signal would be designed to accommodate 500 feet of stopping sight distance. The stopping sight distance is important for situations in which vehicles are stopping along SR-94 attempting to make a left-turn movement. The required 500 feet of stopping sight distance would also be provided at the Vista Diego Road driveway.

Another important design factor for consideration is the corner sight distance. Per Caltrans Highway Design Manual, the minimum corner sight distance for a design speed of 55 miles per hour is 605 feet. Vehicles entering SR-94 from Vista Diego Road have in excess of 605 feet of unobstructed sight distance.

In addition, the installation of the traffic signal at the intersection of SR-94 and Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

COMMENTS	RESPONSES
	QQ 2 cont Furthermore, the installation of the traffic signal would allow vehicles traveling in the eastbound direction to make either a U-turn at the intersection of Lyons Valley Road to then travel westbound toward Vista Diego Road or for them to turn right onto Indians Spring Drive to then turn left from Indians Spring Drive toward Vista Diego Road. A queuing evaluation was done for this intersection to account for future traffic operations when the traffic signal is installed. The queuing evaluation was completed with the traffic associated with the future JIV gaming facility added to the existing peak-hour turning movement counts conducted for the preparation of the traffic impact study for the project. The queuing evaluation demonstrated that during the highest peak-hour of the day (afternoon peak-hour for the eastbound movement), the maximum anticipated queue length would be equal to 400 feet in length. The existing distance between the intersection of SR-94 and Vista Diego Road and the intersection of SR-94 and Lyons Valley Road is over 450 feet. Therefore, even at worse peak-hour conditions, the maximum anticipated queues along SR-94 in the eastbound direction would not exceed the available storage capacity between Vista Diego Road and Lyons Valley Road.

COMMENTS	RESPONSES
QQ 3	QQ 3 Please see RTC QQ2.
QQ 4	QQ 4 Please see RTC B1, B6, and L1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-15

Comment: I am concerned about ingress and egress from Vista Diego Rd onto 94. It is already difficult to get out onto 94 currently with the increased traffic. It is very dangerous to turn left from 94 to Vista Diego heading east on 94. There is no turn out and many (most) residents have been rear-ended while waiting to turn. The light at Lyons Valley that is proposed will make the problem worse because it is so close to Vista Diego. While the light is green on 94, we will not be able to get out (can turn left). When the light is green for Lyons Valley Rd, because the cars will have been stacked up, we will not be able to get out. I am worried about fire and being able to escape. I am worried about safety. My son was in a near fatal accident about 50 ft from the intersection of ~~the~~ Vista Diego and 94 (no drugs or alcohol involved). Please, please don't do this.

(Optional information, please print.)

Name: Nancy Harrelson

Organization: homeowner - Vista Diego

Address: 13789 Calle del Sol, Jamul

Phone: 619-820-2759 E-mail: nharrelson50@gmail.com

How did you hear about this meeting? JAC

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
3391 Greystone Drive Jamul, CA 91935 August 26, 2015 Mr. David Nagy Environmental Analysis, Branch B California Department of Transportation, District 11 4050 Taylor Street, MS242 San Diego, CA 92110 Dear Mr. Nagy: This letter is in follow up to my previous letter of October 2, 2013, which stated my concerns about the insufficient State Route 94 improvements to address the increased traffic from the Jamul Indian Village (JIV) casino, now under construction. I have reviewed the Draft Environmental Impact Report (Draft EIR) and continue to have the following concerns, which I outlined in my previous letter, but are either not addressed or insufficiently addressed in the Draft EIR: I live at Steele Canyon Estates along Jamul Drive and would be directly and negatively affected by the increased traffic this casino, if completed, would bring to the Jamul area. I have several traffic-related concerns that I want to express in this letter: RR 1 The various SR-94 traffic mitigation options in the Draft EIR seem very minimal to me. I feel that SR-94 is woefully inadequate today to support existing traffic, much less the increased traffic resulting from the casino. Adding 70% more casino traffic (9,000 cars per day) will cause major traffic delays and unsafe driving conditions for residents of Jamul and surrounding communities. RR 2 I usually drive from our home to SR-94 via Jamul Drive, Steele Canyon Drive, Willow Glen Drive, and Jamacha Road. The Draft EIR doesn't even address any increased traffic on Jamul Drive after the casino is built since nearly all the casino traffic will use Campo Road. I completely disagree and am certain that Jamul residents and some casino traffic will use Jamul Drive as an alternate route to and from Jamul to access SR-94 via the route I use from my home to avoid the increased traffic on Campo Road. There is already too much traffic that backs up at Steele Canyon Road across the bridge waiting to turn left at Willow Glen Drive, primarily during mornings and afternoons while Jamacha Elementary School is in session. RR 3 I sometimes run from my home to the intersection of Steele Canyon Road and SR-94 and then continue down SR-94 past Steele Canyon High School. In the morning, traffic backs up along Campo Road for at least half a mile waiting to turn right onto Cougar Canyon Road to access the high school. The increased casino traffic will	RR 1 The impacts referenced in the comment are associated with the JIV gaming facility, which is not the project addressed by this Final EIR. Please see RTC B1, B2 and C1. As demonstrated in the Final EIR, the Proposed Project will improve traffic conditions in the vicinity. RR 2 With respect to impacts of the JIV gaming facility, please see RTC B1, B2 and C1. RR 3 The impacts referenced in the comment are associated with the JIV gaming facility, which is not the project addressed by this Final EIR. Please see RTC B1, B2 and C1. As demonstrated in the Final EIR, the Proposed Project will improve traffic conditions in the vicinity.

COMMENTS

exacerbate this problem, not to mention the increased risk to students attending the high school.

RR 4

One of the earlier proposals was to build a third left turn lane (there are two left turn lanes now) on Campo Road (SR94) at the intersection of Campo Road and Jamacha Road. Three left turn lanes are dangerous because drivers tend not to stay in their proper lane. I did not see this included in the Draft EIR, but I don't think the improvements at that intersection will be adequate considering the increased casino traffic. For example, a second right-turn lane will be added to eastbound SR94, but then two lanes must reduce to a single lane on Campo Road just before the Sweetwater River Bridge. In addition, the additional improvements made on other intersections between the proposed casino and this intersection seem to me to be inadequate.

RR 5

The draft EIR totally ignores any increased casino traffic arriving from east of the casino. Even though I won't be affected, this seems unrealistic.

RR 6

I realize that your responsibility is only to address the traffic-related issues that will result if the proposed JIV casino is built, so my comments only relate to traffic issues. In summary, in my opinion, CALTRANS has failed the Jamul community.

Sincerely yours,

John Hayes

cc:
U.S. Senator Diane Feinstein
U.S. Senator Barbara Boxer
U.S. Congressman Duncan Hunter, Jr.
Governor Jerry Brown
California State Senator Ben Hueso
California State Senator Joel Anderson
California Assemblyman Brian Jones
County Supervisor Diane Jacob
Jamul Action Committee
Steele Canyon Estates HOA

RESPONSES

RR 4

The implementation of the third northbound left-turn lane at the intersection of SR-94 and SR-54/Jamacha Road is not included or evaluated as a part of the Final EIR. The implementation of the third northbound left-turn lane was discussed in the early stages of the Project Engineering Evaluation Report for this location and was removed based on the detailed evaluation of the intersection geometrics and signal timing operations of the intersection. The improvements at this location were revised to instead extend as much queuing capacity of the northbound left-turn movement deemed feasible, by restriping the existing roadway and modifying the existing raised medians.

The intersections and roadway segment improvements included in the Final EIR were derived from the analysis included in the Final TEE prepared for the JIV gaming facility, as mitigation measures for the JIV gaming project's direct traffic related impacts.

Adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54/ Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.

The environmental effects of the gaming facility were evaluated comprehensively in accordance with State Indian gaming laws, and an Final TEE was prepared that evaluated all safety issues associated with cars traveling to and from the gaming facility. Please refer to the Final TEE at: http://www.jamulindianvillage.com/relevant-documents/

COMMENTS	RESPONSES
	RR 5 Please see RTC B1, B2 and C1.
	RR 6 The Final EIR addresses impacts of the proposed roadway improvements, which includes many issues beyond transportation.

COMMENTS

To whom it may concern

SS 1 I do not believe Caltrans is meeting their responsibility regarding public safety. From all appearances, the DEIR is little more or less than the TEE submitted by JIV. There is no evidence of expanding or even vetting the information or the conclusions drawn from it.

SS 2 The main concern here is public safety. SR94 is now arguably the most dangerous highway in the state of California. If not mistaken the average number of fatalities on the section between Jamacha Rd and Melody Road over the last ten years was 4.2/mile. At stake here is granting an easement that will more than double the traffic in this critical area.

SS 3 Examining only the intersections in this draft, too much is left out. There is no improvement being required east of the JIV entrance. JIV decided to remove this from their previous assessments for an unknown reason. Perhaps they feel no one from Chula Vista will want to come to their casino. The Otay Lakes Rd intersection is one that is already challenged by poor line of sight for persons entering SR94. There certainly needs to be a center lane added there for making that left turn onto westbound SR94.

SS 4 There is no mention of many smaller side streets that enter SR94 from Jamacha Rd. to beyond the JIV which are currently challenged to make any entrance to the highway much less a left turn entrance. There is a center lane from Steel Canyon High School to just east of Steel Canyon Rd that helps a lot. There needs to be such a center lane available further east, especially at intersections for Vista Sage Ln and Vista Diego Rd. There need to be improvements in the area of the high school as well, which already suffers the tragic loss of a student about every year.

SS 5 Caltrans is the lead agency for CEQA on this project, which is not all about improvements to SR94, but more about granting an easement to JIV to build access to their casino project under construction. That is the project causing impacts that must be mitigated. As it is stated several times in this DEIR the casino project is already "approved" and under construction. This construction is being done on their sovereign land without regard or concern to the impact on the community around it. There is no due process involved as they get to approve it themselves. The only vehicle available to the state or community to require proper mitigation is Caltrans must fulfill their legal responsibility and require full mitigation to be ***completed prior to*** granting any additional easement to SR94. JIV will be all the more motivated to comply should they be facing a finished casino and an existing easement that cannot physically or legally handle the traffic. We will get one chance to do this right the first time, and there may not be a second time.

Most sincerely

Bill Herde 8/5/2015

Bill Herde

2839 Echo Valley Rd.

Jamul, CA 91935

RESPONSES

SS 1 The basis for the majority of analysis presented in the Final EIR is from Caltrans approved Technical Studies, which were incorporated by reference into the Final EIR.

SS 2 The Proposed Project will not itself increase traffic. Please see RTC B1, B2 and C1.

SS 3 Please see RTC B1, B2 and C1.

SS 4 The construction and operation of traffic improvement measures (collectively, the "SR-94 Improvements") that would improve traffic flow and safety along a specific stretch of SR-94 are the Proposed Project evaluated in the Final EIR (see Final EIR Section 1.1). The Proposed Project would not generate any additional traffic volumes and therefore, only the intersections and segments of SR-94 where the Proposed Project would change the geometrics of the corridor were included for evaluation in the EIR. The intersections of Vista Sage Lane and Vista Diego Road were not included in the analysis, since the Proposed Project would not change the geometrics and increase traffic volumes through these intersections.

SS 5 Please see RTC B1, B2 and C1. Unless and until an encroachment permit is granted by Caltrans for construction of highway and intersection improvements within the Caltrans right-of-way, the SR-94 Improvements cannot be built. Such an encroachment permit is the vehicle to allow the improvements to be constructed, and thus must be issued before any improvements may be installed. Please see RTC I15.

COMMENTS	RESPONSES
From: George Hetzel **To:** SR-94_SR-94_Draft_EIR@DOT **Subject:** Jamul Highways **Date:** Thursday, August 27, 2015 3:04:51 PM TT 1 Highway 94 from Jamacha Road through Jamul is extremely dangerous where accidents are common place. Traffic has increased and we are gridlocked today. To add a casino to this area is completely irresponsible, to say nothing of being illegal. This is an example of government officials living in other areas and really not caring about residents in another part of the state. *George* **George Hetzel, Broker Associate** Andrew Arroyo Real Estate Mobile: 619.850.5115 Fax: 619.839.3948 Email: george@hetzelhomes.com CaBRE #01000871	TT 1 Please see RTC B1.

COMMENTS

From: Robert Hill Sr.
To: SR-94_SR_94_Draft_EIR@DOT
Subject: SR94
Date: Thursday, August 27, 2015 3:45:26 PM

UU 1

Second time in 2 weeks that a major accident (this time a fatality and serious injuries) on SR94 East of Jamacha. No SIGALERT!

Close to Steel Canyon HS. About the time school is dismissed. Where are your priorities?

When is Caltrans going to get their act together out here. One of the dangerous SR if not the most dangerous road in California.

Do your job!

Robert Hill
19563 Pringles Cyn Rd.
Jamul, CA 91935
619 468 3011

RESPONSES

UU 1 Caltrans is doing their job by preparing this Final EIR, which addresses the environmental impacts of the proposed SR-94 Improvement Project. Please see RTC L1.

COMMENTS	RESPONSES
SR-94 Improvement Project We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box. CALTRANS, Date: 8-5-2017 UU 2 Comment: YOU MUST BE TIRDING AND YOU MUST BE STICKING YOUR HEADS IN THE SAND WHEN YOU ARE NOT CONSIDERING THE TRAFFIC IMPACTS ON OTAY LAKES RD - CHULA VISTA WITH A POP. OF CLOSE TO 300,000 WILL USE THIS ROAD WHICH IS A WINDY RURAL 2 LANE ROAD. OTHER SOUTHBAY COMMUNITES WILL ALSO BE USING OTL ROAD. INCLUDING SOUTH SAN DIEGO, IMPERIAL BCH, TIJUANA. UU 3 STEEL CANYON H.S. IS ALREADY A TRAFFIC NIGHT MARE FOR JAMUL RESIDENTS. YOUR STUDY DOES NOT ADEQUATELY ADDRESS THE IMPACTS OF CASINO TRAFFIC. UU 4 Honey Springs, Skyline Truck Trail WILL ALSO BE IMPACTED BY THIS PITIFUL APPROACH TO EASING TRAFFIC AS LOCAL RESIDENTS WILL NOW USE THESE ROADS TO BY PASS THE CASINO. UU 5 MORE TRAFFIC ON 94 = MORE ACCIDENTS, INJURIES DEATHS FROM DRUNK DRIVERS DRINKING AT THE HOLLYWOOD CASINO (Optional information, please print) Name ROBERT HILL Organization Address 19563 PRINGLE CANYON ROAD Phone 619 933 3150 E-mail WABABOB@WILDBLUE.NET How did you hear about this meeting? EMAIL Written comments may be submitted by e-mail to:\ SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to: David Nagy Environmental Branch Chief Caltrans, District 11 4050 Taylor Street, MS: 242 San Diego, CA, 92110	UU 2 Please see RTC B1, B2 and C1. UU 3 Please see RTC J1. UU 4 Please see RTC J1. UU 5 Please see RTC J1.

COMMENTS

Veronica Hoban
2776 Vista Del Piedra
Jamul, CA 91935

August 16, 2015

Mr. David Nagy, Chief
Environmental Analysis, Branch B
California Department of Transportation, District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

Dear Mr. Nagy:

Caltrans State Route 94 Improvement Project Draft Environmental Impact Report is flawed at several levels.

VV 1

Caltrans established precedence for denying direct access to SR 94 when it denied an encroachment permit to the Peaceful Valley development in Jamul. Caltrans made a commitment to Supervisor Dianne Jacob and the Jamul-Dulzura Planning District that it would hold the Jamul Indian Village accountable to this same standard regarding the development of a gaming facility across SR 94 from Peaceful Valley. Caltrans further assured that the JIV would be required to implement appropriate improvements to mitigate the significant, adverse traffic impacts associated with the gaming facility prior to its construction.

VV 2

Caltrans is responsible for ensuring significant adverse impacts to the State Highway System from land use decision-making actions are appropriately mitigated. In compliance with CEQA, Caltrans must ***independently*** review and assess the environmental impacts of potential highway improvements in coordination with land use planning agencies, such as the County of San Diego. Caltrans has not acted independently, instead relinquishing its responsibility as the Lead Agency and allowing the JIV to determine which intersections are adversely impacted, how much funding should be set aside for improvements and the timeline for making funding available. The proposed mitigation is woefully inadequate for the six intersections discussed in the Draft EIR and entirely discounts the significant impact to safe access to SR 94 at neighborhood side streets – Rancho Jamul Drive, Las Palmas, Hillside, Vista Diego, Indian Springs, Vista Sage, Via Las Faldas and Rancho Miguel. Additionally, these improvements should be in place prior to any construction or operation of the JIV's gaming facility.

I encourage Caltrans to stop acting like a JIV proponent, and start behaving like a Lead Agency responsible to tax payers for ensuring the safety and operational integrity of the State Highway System.

VV 3

- The new Access Road Alignment for the JIV Gaming Development Project should be the SR-94/Melody Road Alternative, just as required for the Peaceful Valley development.

VV 4

- The intersections at SR-94/ Otay Lakes Road, SR-94/ Honey Springs Road, and most importantly SR-94/ Cougar Canyon (Steele Canyon High School) should be improved as well.

VV 5

- The side streets – Rancho Jamul Drive, Las Palmas, Hillside, Vista Diego, Indian Springs, Vista Sage, Via Las Faldas and Rancho Miguel should be improved.

RESPONSES

VV 1 Please see RTC I11 with regards to access to SR-94. Should the project be approved, Caltrans will make every attempt to ensure that Project features that can be constructed prior to casino operation will be constructed.

VV 2 By virtue of preparing and employing this Final EIR, by using independent judgment and fully examining the proposed intersection improvements and the alternative access routes to the JIV gaming facility, and by consulting with the County of San Diego and other responsible agencies, Caltrans is fulfilling its obligations as a lead agency under CEQA and its mandates as a state agency. If the SR-94 Improvements are approved, JIV will fully fund the work. JIV has the legal right to operate the JIV gaming facility with or without the SR-94 Improvements; however, Caltrans would work with JIV to align as closely as feasible the availability of the SR-94 Improvements with the opening of the JIV gaming facility.

The Proposed Project will not generate any additional traffic volumes and therefore, only the intersections and segments of SR-94 where the Proposed Project would change the geometrics of the corridor were included for evaluation in the EIR. The intersections of Rancho Jamul Drive, Las Palmas, Hillside, Vista San Diego, Indian Springs, Vista Sage, Via Las Faldas and Rancho Miguel, were not included in the analysis, since the Proposed Project will not change the intersection geometrics or increase traffic volumes through these intersections.

VV 3 Please see RTC I11.

VV 4 The construction and operation of traffic improvement measures (collectively, the "SR-94 Improvements") that will improve traffic flow and safety along a specific stretch of SR-94 are the Proposed Project evaluated in the Final EIR (see Final EIR Section S.1, S.4, 1.1). The Proposed Project will not generate any additional traffic volumes and therefore, only the intersections and segments of SR-94 where the Proposed Project would change the geometrics of the

COMMENTS	RESPONSES
VV 6 • Sixteen million dollars is woefully inadequate, Caltrans should seek additional improvements and funding, and these should be funded and operational prior to further construction or operation of the JIV gaming facility. Sincerely Veronica Hoban Veronica Hoban	VV 4 cont. corridor were included for evaluation in the EIR. The intersections of Otay Lakes Road, Honey Springs Road, and Cougar Canyon were not included in the analysis, since the Proposed Project will not change the intersection geometrics or increase traffic volumes through these intersections. VV 5 Please see RTC VV2. VV 6 The JIV has committed to implement all mitigation adopted as part of this CEQA process. Please see RTC I15.

COMMENTS	RESPONSES
SR-94 Improvement Project We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box. Date: 8/5/15 Comment: For the past 17 yrs we have been involved in the fight against a casino in Jamul. The following questions were raised but not answered to our satisfaction: WW 1 ① Originally CAL-TRANS stated they could not place signal lights within a half mile of each other (ie: Lyons Valley Rd; Proctor Valley Rd; Maxwell Rd; Melody Rd) We were given an explanation by one of your representatives that is area is not considered a 'Super Highway' and therefore allowed. After all these years who determined this and why was it never brought to our attentions? WW 2 ② Originally CAL-TRANS stated there was not enough distance for proper access/egress onto Casino property. → (Optional information, please print.) Name: Concerned Jamul Residents Organization: Address: Melody Rd / Proctor Valley Rd. Phone: E-mail: How did you hear about this meeting? E-mail Written comments may be submitted by e-mail to: SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to: David Nagy Environmental Branch Chief Caltrans, District 11 4050 Taylor Street, MS: 242 San Diego, CA 92110	WW 1 Traffic studies and analysis for traffic signals must consider the effects on any upstream or downstream intersections and be based on a reasonable speed and capacity for the impacted state highway. The design standard calls for a signal spacing of a 1/2 mile and right turn only access at 1/4 mile spacing. Along certain corridors where 1/2 mile spacing is not achievable, proposed signalized intersections may have spacing at 1/4 mile increments or greater with no additional access points. WW 2 Caltrans does not have a preferred access point for the casino project as currently defined. In a January 17, 2007 letter to the JIV, Caltrans did cite a preference for access via Melody Road based on the JIV's project plans at that time. Caltrans has asked that all reasonable alternatives be studied to compare differing impacts to SR-94. The alternatives currently being studied include: access at Melody Road, access via the four acre parcel north of Reservation Road, and access via Reservation Road. Please see RTC WW1.

	COMMENTS	RESPONSES
WW 2 cont	Melody Rd was taken into consideration at that time however, the traffic study required for this project still showed the distance was inadequate - again, what has changed?	
WW 3	③ Why are the rules changing to suit the needs of this project? It appears Penn-national indeed has alot of money to sway CAL-TRANS & the Governor's office to move forward. If this is not true, then do the right thing & keep Jamul rural.	WW 3 Please see RTC J1.

COMMENTS

From: Debbie Hopkins
To: SR-94_SR_94_Draft_EIR@DOT
Subject: CALTRANS SR 94 improvement project
Date: Thursday, August 27, 2015 4:13:25 PM

XX 1 I am writing as a concerned resident of jamul and a native American. This is the most backwards, inconsiderate and incongruent allowance you are making for a few outsiders. It makes no sense to anyone living in the area or anyone with any sense. Must be the money! It makes me ashamed of our government. " of the people". You are truly infringing on our rights to a safe and decent community.
D Hopkins of Deerhorn Valley

RESPONSES

XX 1 The proposed SR-94 Improvement Project, which is the subject of the Final EIR, is designed to improve conditions on SR-94. With regards to the JIV gaming facility, please see RTC B1.

COMMENTS	RESPONSES
From: Jacob Huggins **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** "CALTRANS SR 94 IMPROVEMENT PROJECT" **Date:** Thursday, August 27, 2015 4:02:59 PM YY 1 Hello, I am writing to comment on the SR 94 improvement project. I am a regular driver on highway 94, and I can say this with confidence: it is the most dangerous road I've driven on in San Diego and I've never seen so many accidents happen with such frequency. We hear about accidents on this road about once a week, many of them t-bones and headons, many not reported in the news, at the junction of otay lakes road and 94 where there is a blind curve after the border patrol station and next to a bridge, that sees large semi truck traffic regularly. Pulling out onto this particular road from otay lakes requires faith that someone is not speeding away from the border patrol station right as you turn out, there is literally no room for error. And the road is littered with these sorts of turn ons and driveways, without a single traffic light on the east end of where the casino is being built. This is a two lane highway with heavy usage, receiving border traffic and drivers from national city and chula vista, it has many instances of passing lanes near blind turns. Additionally, I can tell you as a regular driver that the work done to the road was terrible, SR94 used to drive smoothly but the recent work made the road uneven and requiring constant attention to the wheel to avoid running either off road or into oncoming traffic. What will the consequences be with the added casino traffic coming from all directions? I don't want to think of how a drunk driver pulling away from the casino is going to cope with this road. How many people will die because of drunk or sleep deprived drivers, elderly drivers, tourists unfamiliar with the area, drivers from mexico all coming to an extremely large casino and shopping complex serviced only by two lane roads? Regardless of one's views on the casino itself, an objective appraisal of the road situation is simply this: the caltrans has failed to make a dangerous road safer, it has degraded the road, it has not made proper accommodations for the increased traffic, which will not just affect 94 but the tributary roads as well, and it is endangering a large rural community that relies on 94 to get to town and work and as an escape route in the case of a fire, not to mention the electric line which has been knocked out by accidents before, and a community that will now live in fear every time they have to drive into town. Caltrans will ultimately be held accountable for the work they have done. I urge you to take a close look at the situation and reassess the safety of the road, particularly the poor grading work and the lack of street lights, or we will all suffer for it. Signed Jacob Huggins Jamul resident	YY 1 Please see RTC L1.

COMMENTS	RESPONSES
From: Linda Ivy **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** CALTRANS SR 94 IMPROVEMENT PROJECT **Date:** Thursday, August 27, 2015 5:35:15 PM CALTRANS SR 94 IMPROVEMENT PROJECT "We're here to you get you there" ZZ 1 I live in Jamul.I have serious concerns about the condition of State Route 94 now and in the future if a casino is allowed to operate without providing the necessary improvements that amount of increased traffic warrants. My husband was the victim of being rear ended twice while turning left onto Vista Sage Rd from westbound 94. Both of our vehicles were totaled. I am not going to reflect on why I think this Casino Project is being pushed through your department. I beg you to think of the lives of the families that live in Jamul. A concerned Jamul resident, Linda Ivy	ZZ 1 Please see RTC L1, B1, B2 and C1.

COMMENTS

From: LJ
To: SR-94_SR_94_Draft_EIR@DOT
Subject: CALTRANS SR 94 IMPROVEMENT PROJECT
Date: Thursday, August 27, 2015 4:23:34 PM

I just have received this 654 page document today, and do not have the time to go through it in painstaking detail prior to a 5:00pm deadline.

I am a resident of eastern Jamul.

AAA 1 I strongly agree with the need for a traffic light at the Lyons Valley Road/SR94 intersection.

AAA 2 I do not understand the relative value of a second turning lane from Jamacha Road to west bound SR/94, as a part of this EIR.

AAA 3 From what I can tell, I do agree with the other road widening/road improvements as they are shown on the JIV website, however, it is not clear to me whether access to intersecting roads and businesses at/from the opposite side of SR94 will be made worse/impossible by these changes. There are some small roads off of SR 94, north of Lyon's Valley road where it is very windy and difficult to see oncoming traffic. It is often difficult to exit from the parking lot at Jamul Hardware to travel south on SR 94, and or get gas the AM/PM then cross over to the hardware store.

AAA 4 I really don't understand why the plans end at the Jamul Indian Reservation, when clearly the boat load of casino traffic will come from the south - from Mexico, from EastLake/Chula Vista via Otay lakes road. There should be a traffic light at the intersection of Otay Lakes Road and SR 94, especially because of the "geometrics" of how those two roads intersect - requiring more than a 90 degree turn from Otay Lakes Road into SR94 north, at a partially blind intersection.

AAA 5 I don't understand why there is no widening of SR94 south of JIV, nor a median strip proposed to mitigate head on collisions and other dangers from distracted driving.

AAA 6 If there is discussion of tour bus trips to the casino and the additional environmental impacts this may cause and how this is to be mitigated, I haven't gotten to that yet. Nor to the increase of ongoing road maintenance to be precipitated by increased commercial traffic serving the casino.

AAA 7 I do not know the height/character of proposed retaining walls. These could be a real eye-sore and greatly destroy the rural character of Jamul if they are too large/too tall and/or unaesthetically designed.

Lauren Jackson

RESPONSES

AAA 1 Per Section 2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities, the installation of a traffic signal at the intersection of Lyons Valley Road and SR-94 would improve the operations of this intersection to acceptable level of service.

AAA 2 Adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54/ Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection.

AAA 3 Within the footprint of the improvements analyzed in the Final EIR, none of the existing left-turn lanes along SR-94 would be removed, therefore, impacts to the ability for vehicles to enter the existing driveways and County roads along SR-94 will not be negatively impacted by the project.

In addition, the installation of the traffic signal at the intersection of SR-94 and Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering existing driveway near the intersection of Proctor Valley Road, near where the mentioned Jamul Hardware and AM/PM station is located.

AAA 4 Please see RTC L1, B1, B2 and C1.

AAA 5 The widening of SR-94 along the frontage of the JIV gaming facility is being designed per Caltrans Highway Design Manual and the California Manual of Traffic Control Devices. SR-94 is classified as a 2-lane Conventional Highway and therefore, the conventional highway requirements are being included in the proposed roadway widening. For this reason, the addition of a median barrier is not included as a part of the project. Instead rumble strips would be installed along the centerline stripe which is consistent with Caltrans standards for 2-lane Conventional Highways.

COMMENTS	RESPONSES
	AAA 6 Please see RTC L1, B1, B2 and C1.
	AAA 7 The retaining wall heights vary with each alternative. Final EIR Section 1.4 Project Alternatives contains a sub-section titled "Retaining Walls" that provide design and height details of proposed reatining walls at each Project location.

COMMENTS

From: Johnston
To: SR-94_SR_94_Draft_EIR@DOT
Subject: CALTRANS SR 94 IMPROVEMENT PROJECT
Date: Thursday, August 27, 2015 8:19:44 PM

BBB 1 this is an unsafe area that will only be worse with a large facility and thousands of more cars. I am against the project.

RESPONSES

BBB 1 The project being addressed is the SR-94 Improvement Project, not the JIV gaming facility. Traffic will not be increased with the SR-94 Improvement Project. As disclosed in Section 2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities, the proposed improvements would result in improved traffic operations compared to the No Build Scenario (see Final EIR Section 2.4.3 Horizon Year (2035) plus Proposed Project Conditions Analysis. Please see RTC C1 and L1.

COMMENTS	RESPONSES

1 of 2

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment:

CCC 1 (1) Throughout this report the Jamul Indian Village is referred to as "Jamul Indian Village Tribal Lands." The Jamul Indian Village is NOT a tribe or reservation.

CCC 2 (2) There is nothing to address the traffic impacts east of the proposed casino. Otay Lake Rd is a winding 2 lane road through an area of environmental + ecological importance. The casino will be the closest casino to Eastlake. I do not believe that the projections done ~~correct~~ correctly addressed the traffic impact. Proctor Valley Rd. will only worsen the numbers coming from Chula Vista ~~see~~ and Eastlake severely affecting the neighborhoods and way of life in Jamul.

CCC 3 (3) At the intersection of Lyons Valley Rd / Hwy 94 a home is being built within 50' yards of the intersection. This is ignored in the report.

I look forward to your responses!

(Optional information, please print.)

Name: DEAN JONES

Organization: JAMUL Home owner

Address: 2718 VISTA DEL PIEDRA JAMUL 91935

Phone: 619-813-2098 E-mail:

How did you hear about this meeting?

Written comments may be submitted by e-mail to: SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS 242
San Diego, CA 92110

CCC 1 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response.

Nevertheless, Caltrans notes that JIV is federally recognized Tribe, as disclsoed in the annual list of such tribes published by the United States Department of Interior in the Federal Register, see most recently 80 Fed. Reg. 1942-02 (January 14, 2015).

CCC 2 This comment appears to misunderstand the Proposed Project evaluated in the SR-94 Improvement Project Final EIR. The gaming facility currently under construction is not the Proposed Project and Caltrans has no authority over its construction or operation. Please see RTC B1, B2 and C1. The Proposed Project would not generate additional traffic, but will ameliorate traffic impacts and improve traffic movement.

CCC 3 The installation of the traffic signal at the intersection of Lyons Valley Road and SR-94 was evaluated and included in the Final EIR following the Caltrans' *Guide for the Preparation of Traffic Impact Studies*, dated December 2002. Per the guidelines outlined in this document, all intersections and roadway segments where the project would make modifications were analyzed in detail using the methodology and criteria stated in Caltrans' guidelines.

This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual.

The existing peak-hour counts used for the evaluation did not include traffic generated by the new residence being constructed near Lyons Valley Road. However, Near Term and Horizon

COMMENTS	RESPONSES
2 of 2 **SR-94 Improvement Project** We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box. Date: 8/5/15 Comment: CCC 4 — (1) ~~BA~~ ROAD SIGNS ARE ON THE HWY 94 ROAD APPROACHING THE CASINO ADVISING OF ROAD WORK. THERE IS NO ROAD WORK GOING ON. CCC 5 — (2) AN Atlas Sign employee ~~picking me~~ WAS PICKING UP SIGNS WITH THE VEHICLE IN A TRAFFIC LANE OBSTRUCTING TRAFFIC ON FRIDAY ~~August~~ July 31 AT ABOUT 6:15 PM. He was flipping off people who HONKED THEIR HORN. (3) MORE COMMENTS WILL BE SUBMITTED. (Optional information, please print.) Name: DEAN JONES Organization: JAMUL HOMEOWNER Address: 2218 VISTA DEL PIEDRA Phone: 619-813-2098 E-mail: dean.alan@live.com How did you hear about this meeting? Written comments may be submitted by e-mail to:\ SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to: David Nagy Environmental Branch Chief Caltrans, District 11 4050 Taylor Street, MS: 242 San Diego, CA 92110	
CCC 3 cont.	Year analysis included traffic associated with anticipated future growth, which would include the traffic generated by this new residence.
CCC 4	The flaggers and caution signs temporarily placed in the SR-94 right-of-way are for driver safety during construction of the JIV gaming facility. The gaming facility is not the Proposed Project and Caltrans has no authority over its construction or operation. Please see RTC B1, B2 and C1. Placement of the flaggers and caution signs in the SR-94 right-of-way is authorized by permit. Please see also RTC E5.
CCC 5	Please see RTC CCC4.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-15

Comment:

DDD 1 1.) what is A PROJECTED AMOUNT of INCRESSED TRAFFIC, AND what is TRAFFIC AMOUNTS NOW

DDD 2 2. what is EFFECTED RESPOSE TIME? (EMERGENCY)

DDD 3 3.) Why is CALTRANS INSTALLING RETAINS WALLS AND NEW ROAD ON RESERVATION PROPERTY?

DDD 4 4.) WHAT HAPPEN'S TO MELODY Rd / PROCTOR VALLEY Rd EAST OF PROPOSED IMPROVEMENTS?

DDD 5 5.) HOW DOES HOME OWNERS ENTER GOING SOUTH INTO LAS PALMAS Rd?

DDD 6 (6) WHAT is PROPOSAL @ STEEL CANYON Rd. This is ALLREADY A High TRAFFIC AREA'S (I SEE NO IMPROVEMENTS)

(Optional information, please print.)

Name John Kaufman

Organization RESIDENT

Address 2840 PIONEER WAY JAMUL CA. 91935

Phone 619-843-9145 E-mail JKuyamaca@GMAIL.COM

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

DDD 1 The intersection and roadway segment improvements evaluated with the Final EIR would not induce additional traffic along SR-94 (SR-94) as the improvements would not provide additional network changes to the circulation network within the study area. The improvements on their own are not anticipated to generate additional traffic volumes along SR-94 or the connecting street network within the study area.

Section 2.4 of the Final EIR "Traffic and Transportation/Pedestrian and Bicycle Facilities" includes figure illustrating the existing and projected vehicular traffic along the corridor at key intersections.

DDD 2 The Proposed Project would not generate additional traffic on area roadways, but will instead ameliorate traffic impacts and improve traffic movement in the event of an emergency requiring ambulance transport or evacuation.

DDD 3 Caltrans is not installing retaining walls and new road on Reservation Property.

DDD 4 All access alternative improvements evaluated in the Final EIR include the signalization of the intersection of Melody Road and SR-94. Depending on the alternative, Melody Road will be widened to provide additional turning lanes approaching SR-94 meeting the County of San Diego's standards.

Improvements at the intersection of Proctor Valley Road and SR-94 were not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR.

COMMENTS	RESPONSES
	DDD 5 Within the footprint of each of the Access Alternative improvements shown in Figures 1-9 through 1-13, there are not private driveways or private streets that currently have designated left-turn pockets in or out of the existing properties along SR-94 or Melody Road. None of the proposed access alternatives propose to eliminate left-turn movement in or out of these properties, including Las Palmas Road. Left-turn movement onto Las Palmas Road will not be modified or affected with any of the Access Alternatives included in the Final EIR.
	DDD 6 The Tribal Environmental Evaluation prepared by the JIV gaming facility identified the need for permanent improvements to the State Highway System. Improvements at the intersection of Cougar Canyon Road (Steele Canyon High School entrance) and SR-94 were not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR. Please see RTC H5 and C1.

COMMENTS

Received
AUG 20 2015
Executive Offices

I am responding to the mitigations plans for improvements to Highway 94.

EEE 1 Who do you think you are to take over the parking lots of our produce store, Jamul Flowers, Bravo Café and Cal Sol Restaurant for your employees' and construction employees' parking? It has to be against the law. They should have each and everyone towed every time you park your vehicles or equipment in their lot. How is the community of Jamul to shop there? The people of these businesses will go out of business.

EEE 2 The land that you aided and abetted the Jamul Indians and Penn National to build a casino on property that is not a reservation, and has never been a reservation. Do you realize that between 95-98% of Jamulians are against the casino. Please prove that the JIV is a recognized tribe for gaming. And while you are at it, where are the permits for the casino to be built?

EEE 3 What about working with the community? When's that going to happen? Caltrans is typical government, screwing the people who pay the taxes.

Emma King

RESPONSES

EEE 1 It is unclear whether the commenter is referring to existing issues regarding construction parking, or if they are referring to the Project's proposed temporary use of the parking area during construction. Temporary construction impacts associated with the SR-94 Improvement Project are discussed on page 2.3-9 of the FEIR.

EEE 2 The comment is directed at the JIV gaming facility, not the adequacy of the Draft EIR. The comment is noted.

EEE 3 Chapter 6.0 of the Final EIR documents the consultation and coordination efforts undertaken by Caltrans for the SR-94 Improvement Project. Public comments were solicited during the public scoping process at the beginning of the process, and during the Draft EIR public review period. Additionally, Project Development Team meetings, which included members from agencies and the public, were held during the drafting of the Final EIR.

COMMENTS	RESPONSES
From: Curtis Kopotic **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** CALTRANS SR 94 IMPROVEMENT PROJECT **Date:** Thursday, August 27, 2015 4:54:01 PM FFF 1 I wanted to write and express my opposition to this project on SR 94. Having been born and raised in Deer Horn Valley I know how dangerous the 94 already is, and making minimal changes to aid more drivers who will most likely be impaired makes no since. Please recognize and accept that this casino will hurt more then it will help, and the price will be human life taken on the 94. Thank you, Curtis Kopotic	FFF 1 Please see RTC B2.

COMMENTS	RESPONSES
From: Jan Kopotic **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** CALTRANS SR 94 IMPROVEMENT PROJECT **Date:** Thursday, August 27, 2015 8:12:43 PM GGG 1 The improvements on SR94 in Jamul have only benefitted the casino. The community has been ignored. With traffic delays and accidents not being reported it is not how our tax dollars should be spent. Jan Kopotic Sent from my iPhone	GGG 1 The SR-94 Improvements mitigate the traffic impacts of the JIV gaming facility at those locations. The Project is being funded by the JIV, not the public as implied by the commenter. The community has not been ignored, please see RTC BB4.

COMMENTS

The goal is to provide a safe community and avoid accidents and delays on Hwy 94.

Please review the following observations and respond with action to be taken to address.

A)**Traffic Congestion** on **Main thoroughfare** of HWY 94 – which is the **sole** corridor of the East County Communities of Jamul, Dulzura, Potrero, Barrett Junction and Tecate. The proposed intersection improvements do not deal with the traffic flow on the main highway 94 corridor. (each bullet needs to be addressed with a response)

HHH 1

1. Traffic delays to Steele Canyon High School 7-8 am and 2:30-3:30 pm M-F and School Events

   Traffic currently backs up over 1 mile in both directions and frequently winds onto Campo Rd (hwy 54), more turning lanes cannot aid with the backed up flow into the school, unless more lanes are provided over the bridge and past the high school the traffic is stopped.

HHH 2

2. The Formula used to determine the daily traffic impact must take into account slow moving vehicles on the one lane highway. The road has frequent backups of over 8 cars due to slow moving drivers, trucks. The amount of traffic going below the speed limit is greater than average due to the winding road. More traffic will add more slow moving vehicles due to the unfamiliarity of the curvy road.

HHH 3

3. Turning Lanes are frequently used as passing lanes, unless passing lanes are added in both directions between Lyons Valley and Steele Canyon HS, there will be an increased frequency of this behavior due to the volume of traffic and frustration with additional slow drivers.

HHH 4

4. Ability to deal with Natural Disaster (High Fire Hazard Area), how does this impact the evacuation of residents? One accident and more people will be trapped and or killed.

HHH 5

   Unless additional lanes are added and a divided highway is created, it is highly unlikely the traffic on the main corridor can maintain the current Service Level.

Other road observations – Response Required

HHH 6

5. On highway 94 between Lyons Valley Road and Steele Canyon, there is a stretch with **no shoulder on the right side going West.** How is pedestrian and bicycle traffic through this stretch? *Very tight for cars too.*

HHH 7

6. **On Lyons Valley Road, there is a blind curve** just before where traffic backs up to HWY 94. With the addition of a new traffic signal, it is feasible that more traffic would build up waiting for a green light just in front of this blind curve and increase the probability of rear-end accidents. It would need some sort of light triggered by backed up traffic to warn drivers.

HHH 8

7. **Deadly Intersections at Vista Diego and Vista Sage Roads.** Both of these intersections **need turn lanes.** (Vista Diego going East, and Vista Sage going West) This potentially would have

RESPONSES

HHH 1 Thank you for the comment. Addressing traffic conditions on SR-94 near Steele Canyon High School is beyond the scope and purpose of this Final EIR. Please see RTC G1.

HHH 2 The Proposed Project will not generate additional traffic; rather, its objective is to improve traffic efficiency and safety. The existing road conditions that provided the basis for the analysis reflected the existing volumes and speeds of traffic (see Final EIR Section 2.4).

HHH 3 Please see RTC C1. The proposed intersection improvements would improve levels of service on the roads so as to minimize the behavior discussed in the comment.

HHH 4 The Proposed Project would improve conditions on the roads, thus assisting with such emergency situations. Please see RTC G9.

HHH 5 The Proposed Project would not add traffic to the roadways. Please see RTC B1, B2 and C1.

HHH 6 Caltrans has recently completed a roadway resurfacing project along SR-94 within the areas evaluated in the Final EIR. Standard 8-foot shoulders were provided where feasible.

Within the footprint of the improvements analyzed in the Final EIR, standard 8-foot shoulders would be provided.

HHH 7 The installation of the traffic signal at SR-94 and Lyons Valley Road would require that the minimum stopping sight distance be provided for vehicles traveling along SR-94 at the design speed of 55 MPH. The stopping sight distance would be determined based on the maximum anticipated queuing at the intersection from a delay and queuing evaluation with the existing and expected future volumes.

In addition, "Signal Ahead" warning signs with a flashing yellow light would be added approaching the intersection on both sides of SR-94.

HHH 8 Improvements at the intersection of SR-94 and Vista Sage Lane were not included within the project description or evaluated

COMMENTS

more positive impact on Highway 94 than all of the other intersections listed in the environmental report. Level of Service is only one aspect to review; **safety should be the first yet it is not included in the report.** **Please if nothing else do this!**

HHH 9

8. **Steele Canyon High School Traffic Delays** – Cal Trans needs to review the Environmental Impact Review done for the building of the Steele Canyon High School to identify the flaws in that review that created the traffic issues that the community has had since. **Cal Trans must be accountable** for its actions and articulate to the public the findings from that study and what has been done to prevent it from occurring again and what is being done to mitigate the problem that was caused.

HHH 10

9. Pg 417 permits construction during Steele Canyon Peak traffic delay periods. No construction should occur between **6:40-8am and 2:40-3:30pm due to the impact on commutes and school traffic!** **Prior to starting construction, please observe traffic issues and times.**

HHH 11

10. The Environmental Impact Report contains concerns in regards to traffic:

Traffic concerns, which received the majority of comments, were focused on the impacts to neighboring properties, Steele Canyon High School, impacts to emergency response due to traffic stacking on SR-94, sight distance impacts, impacts to additional County roadways and intersections, and impacts associated with the redistribution of traffic related to Alternative 3: Melody Road Access Alignment. Additional traffic comments were submitted that were prepared as comments on the JIV Gaming Development Project Tribal EE. These comments addressed such items as construction traffic, emergency access, traffic accidents causing roadside fires, school buses and the need to address impacts at other SR-94 and County intersections

The response is void of any solutions or responses to the community's comments.

HHH 12

11. Water Usage – In a drought stricken California, how can we justify asking residents to cut-back, yet indulge the additional water requirements of such a project?

What is the estimated water usage for construction of highway? Building? Ongoing?

RESPONSES

HHH 8 cont

under the Final EIR, since improvements to this intersection were not included as part of the improvements identified as mitigation measures in the Final TEE prepared for the JIV gaming facility.

The installation of the traffic signal at the intersection of SR-94 and Lyons Valley Road was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. The installation of the traffic signal at the intersection of Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

Furthermore, the installation of the traffic signal would allow vehicles traveling in the eastbound direction to make either a U-turn at the intersection of Lyons Valley Road to then travel westbound toward Vista Diego Road or for them to turn right onto Indians Spring Drive to then turn left from Indians Spring Drive toward Vista Diego Road. Therefore, access to this intersection is improved from SR-94.

HHH 9

As the lead agency for the SR-94 Improvement Project, Caltrans has diligently prepared this Final EIR, as well as the numerous supporting planning studies, in consultation with other public agencies. Caltrans will carefully evaluate all evidence in the record before taking action on this project. The commenter apparently has concerns over the manner in which another project was addressed, but that is not pertinent to the project analyzed in this Final EIR, except to the degree that the results of the prior project have affected the existing traffic conditions that provide the basis for this Final EIR, in which case, the relevant effects of such prior action have been accounted for in this Final EIR.

HHH 10

The Project would be implemented using a Caltrans approved Transportation Management Plan, which was identified as mitigation in Section 2.4 Traffic and Transportation/Pedestrian

COMMENTS	RESPONSES
	HHH 10 cont and Bicycle Facilities (see page 2.4-69). Measure 1a requires that the TMP ensure to reduce traffic delay or time spent in the queue to less than 15 minutes above normal recurring traffic delay. Additionally, Measure 1b also requires the maintenance of traffic flow throughout the corridor and surrounding areas. These measures, and others listed will be sufficient to ensure safe and efficient flow of traffic through the construction sites. The TMP will ban construction during the time frames cited by the commenter if deemed necessary.
	HHH 11 Comments on the Draft JIV Tribal Environmental Evaluation were responded to in the Final TEE. Comments submitted on the Draft EIR for the Proposed Project are responded to in this Final EIR. Comments submitted during the Draft EIR comment period have been responded to, and these comments/responses are made part of the SR-94 Improvement Project Final EIR.
	HHH 12 Please see RTC E31. The SR-94 Improvement Project does not include the JIV gaming facility.

COMMENTS	RESPONSES
From: Rebecca Lester **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Desperate Traffic Situation **Date:** Thursday, August 27, 2015 3:12:03 PM III 1 To whom it may concern: I live in Deerhorn Valley in Jamul and my mom and nephew live in Spring Valley. My nephew attends Steele Canyon High School. As you may know Steele Canyon High School sits on the two lane 94 freeway which is also may main way out of Deerhorn Valley and into town. We rely on this narrow stretch daily and it is literally our lifeline in emergencies. There is only one alternate way out of Deerhorn and that is Jamul Drive to willow Glen to Rancho San Diego. As of right now both of these options are completely blocked due to a fatality at Steele Canon Produce. Something has to be done about this deathtrap situation. Also, as you may know they are planning to open a Casino on this same narrow stretch in the Spring! You have to do something about this it is literally killing us. You need to at least widen it to 3 or 4 lanes if you are going to allow major construction out here. What is next a Walmart? Thanks for listening. Rebecca Lester	III 1 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
From: Lester, Rebecca **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** CALTRANS 94 IMPROVEMENTS PROJECT **Date:** Thursday, August 27, 2015 10:47:38 PM III 2 Regarding the proposed improvements, they are not enough. They do not address alternate routes or the road widening all along 94 that is necessary. There are no proposed improvements to mitigate danger to parents and children entering/ exiting Steele canyon high school. Much Morris going to be needed to address all of these issues. This is a PRIVATE message. If you are not the intended recipient, please delete without copying and kindly advise us by e-mail of the mistake in delivery. NOTE: Regardless of content, this e-mail shall not operate to bind CSC to any order or other contract unless pursuant to explicit written agreement or government initiative expressly permitting the use of e-mail for such purpose.	III 2 Please see RTC L1, B1, B2 and C1.

COMMENTS

From: Lauren Linstad
To: SR-94_SR_94_Draft_EIR@DOT
Subject: SR-94 Improvement Project
Date: Thursday, August 27, 2015 3:46:48 PM

August 27, 2015

Today a fatal accident on 94/Campo Road, reminded me to submit my input regarding the proposed improvements.

There are many safety concerns on this road that will be accentuated by casino traffic, but are not addressed by the current proposal. However, I will focus on the Vista Diego Road area since this is where our family lives.

JJJ 1 The additional casino traffic and the proposed stop light will make it extremely difficult to safely enter and exit our neighborhood. A left turn from Vista Diego Road onto 94 will be impossible as the stop light will back traffic up past our driveway.

JJJ 2 I urge you to come out and look at this area. Drive it. Don't just look at drawings on paper. Please hear our concerns for safety!

JJJ 3 I truly wish I could think of a solution and not just state the problem. We are hoping that our concerns will be taken seriously.

Respectfully,
Cynthia Linstad
3184 Vista Diego Road
Jamul, CA
619-669-8538

Sent from Yahoo Mail for iPhone

RESPONSES

JJJ 1 The installation of the traffic signal at the intersection of SR-94 was Lyons Valley Road and evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. The installation of the traffic signal at the intersection of SR-94 and Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

JJJ 2 Those involved in the production of the SR-94 Improvement Project have visited the site on several occasions. The public concerns have been, and are being heard. Please see Final EIR Section 6.2, which describes the public scoping process that has been held for the SR-94 Improvement Project. Also, please see responses included in these responses to comments.

JJJ 3 Please see RTC L1, B1, B2 and C1.

COMMENTS

Jamul, Ca. Thursday August 20, 2015

Department of Transportation District 11
4050 Taylor St. MS 240
San Diego, CA.

BILL FIGGE
Deputy District Director
JIV / PENN CEQA for SR 94

Dear Mr. Bill Figge:

KKK 1 My family and I are some of the thousands of people that circulate through Route 94, it is very sad to see how a public agency (CalTrans) has been acting on this Casino situation, not enforcing the law the way it should be or let's put it this way, not using the common sense to oversee the potential for more accidents to occur in this Route 94; we live across the street from the Jamul Rural Fire Station, we hear the sirens almost every day now, as a reminder of the amount of accidents that happen south of the station, and now with the Casino traffic. We are assuming most of the employees will be coming from Tecate Mexico on the south. Traffic and accidents will be worse.

To bad we all have to pay for this and only a handful of people will benefit from this.

Sincerely,

Jorge Lizarraga
3011 Calle Allejandro
Jamul, CA 91935

RESPONSES

KKK 1 Please see RTC III1. The objective of the Proposed Project is to improve traffic levels of service and road safety.

COMMENTS

8-22-15

Dear Mr Figge:

LLL 1 I am writing concerning recent and proposed work on SR94. I have lived in Jamul since 1998 and travel SR 94 daily. I am concerned that the recent completion of resurfacing and painting was necessary but was not done to the best for the amount of money that was spent. I mean it simply was a patch job and could have been done to facilitate the traffic and add more safety to the road.

LLL 2 The road should have been widened by at least one more lane space or 12 feet. Blind corners could have been graded to give more visual for stopped traffic ahead. There are turn lanes missing at Vista Sage and at the entrance to the Veterinary office. A traffic light is needed at Melody Lane and Otay Lakes road. These are very dangerous areas. If the public had been notified and had input I think these improvements would have been addressed.

LLL 3 I do know that now SDGE are working along this stretch and Caltrans will have to be involved again. I am asking for the above mentioned items to be addressed as long as this work is going on make it safer. I personally think that cement dividers between opposing lanes would keep from drifting and head on accidents from happening.

LLL 4 Lastly a 10 hour closure due to a truck and car collision kept residents from going anywhere in intensive heat. This is a warning sign to what could happen in a fire situation. There needs to be enough room on this SR94 to go around an accident.

Thank you for listening,

Marcy May
13997 Whispering Meadows LANE, JAMUL

RESPONSES

LLL 1 The commenter is referring to a road resurfacing project on SR-94 that is not related to the SR-94 Improvement Project.

LLL 2 The highway and intersection improvements that comprise the SR-94 Improvement Project were derived from the analysis of the environmental impacts of the JIV gaming facility set forth in the Final TEE. That document was subject to public review and comment, as well as a public meeting to accept comments. Please see RTC B1, B2 and C1.

LLL 3 Existing SDG&E work is not an element of the SR-94 Improvement Project.

LLL 4 Section 2.5.2 of the Final EIR states that emergency response times are expected to improve post-Proposed Project as intersection operations improve with the exception of the left-bound turn onto SR-94 from Jamacha Boulevard. At this location, ample width for safe passage for fire and emergency vehicles is available should fire, emergency and/or law enforcement vehicles need to access SR-94 northbound from Jamacha Boulevard under the Horizon Year scenario 2035.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

LLL 5 Comment: Please look at having a traffic light at VISTA SAGE and Otay LAKES Road

LLL 6 I think that a cement center needs to be placed at some of the corners between Otay lakes and Jamacha Blvd.

(Optional information, please print.)

Name: MARCY MAY

Organization:

Address: 13997 Whispering Meadows Ln

Phone: 619-669-2925 E-mail: marcy.m.may@yahoo.com

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

LLL 5 Improvements at the intersection of SR-94/Vista Sage or SR-94/ Otay Lakes Road and SR-94 were not included within the project description or evaluated under this Final EIR. The Proposed Project consists of specific roadway improvements designed to address traffic increases resulting from the JIV gaming facility. Please see RTC III1. These traffic improvements do not generate traffic and would not adversely affect Otay Lakes Road or Vista Sage operations. Section 2.4 Traffic and Transportation of the Final EIR demonstrates that the operations at the intersection of Otay Lakes Road and SR-94 will not change with the implementation of the Proposed Project. To the extent that the commenter's concerns deal with the JIV Gaming Facility Project, please see RTC B1, B2 and C1.

LLL 6 The improvements evaluated within the Final EIR will be designed per Caltrans Highway Design Manual and the California Manual of Traffic Control Devices. SR-94 is classified as a 2-lane Conventional Highway and therefore, the conventional highway requirements are being included in the proposed roadway improvements. For this reason, the addition of a center barrier is not included as a part of the project. Instead rumble strips would be installed along the centerline stripe which is consistent with Caltrans standards for 2-lane Conventional Highways.

COMMENTS	RESPONSES
SR-94 Improvement Project We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box. Date: 8/5/15 MMM 1 Comment: My greatest concern is public safety. I am worried that a casino that promotes a "Beer Garden" in a rural area is very unsafe. I imagine many drunk drivers on the road that has a high school with young, inexperienced drivers is a recipe for disaster. MMM 2 - I am also concerned about the commute delays coming and going to work when many traffic signals are not well timed and with 9,000 more drivers it will significantly delay my commutes every day. (Optional information, please print.) Name: Vicki McCalmont, NP Organization: Address: 14691 Chaparral Slope Rd Jamul CA 91935 Phone: E-mail: vmccalmont@cox.net How did you hear about this meeting? JAC Written comments may be submitted by e-mail to:\ SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to: David Nagy Environmental Branch Chief Caltrans, District 11 4050 Taylor Street, MS: 242 San Diego, CA, 92110	MMM 1 Please see RTC B1. MMM 2 The gaming facility currently under construction is not the Proposed Project. The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1, B2 and C1.

COMMENTS

-----Original Message-----
From: am [mailto:motherofS@cox.net]
Sent: Wednesday, August 05, 2015 7:46 PM
To: CT Public Information D11@DOT
Subject: Re: Public meeting about SR 94 held 5 August at Willow Glen

To whom it may concern:

My husband and I attended the "meeting" tonight which seemed too be just a display of the plans made. I did not leave a comment as my questions were still formulating and my husband wanted to get back to get to sleep. I have since started wondering about a few more things:

NNN 1 1. Looking at the displays, it looks as if the businesses at the intersection of Steele Canyon will be majorly affected. What kind of mitigation is planned to allow them to stay part of our community?

NNN 2 2. I did not notice any plans to alleviate the already dangerous use of the shoulders by cyclists. Is anything being done to protect both them and those of us who drive this road?

NNN 3 3. Are there any plans to notify those of us who must travel SR 94 when and where the construction will be backing up the roads? The previous repaving seemed to last over a year and there was never any way to plan ahead for where and how long we might be stuck wasting gas and time when we needed to get to school etc.

NNN 4 4. How are additional stoplights going to affect the irrational driving done just past the proposed casino? Drivers have been speeding and increasingly passing on the "new" double lines especially at night. I am concerned that this will only get worse with the additional slowing of traffic. Are there plans to address this problem?

Thank you for your attention.
Anita McClatchey

This email has been checked for viruses by Avast antivirus software.

RESPONSES

NNN 1 Having a second lane in the eastbound direction would facilitate and enhance access for the businesses along the south side of SR-94, as the second lane would provide an opportunity for a slower lane of traffic for vehicles making a right-turn movement. The existing two-way left-turn lane along SR-94 would be maintained to facilitate the movement in and out of the existing driveways.

NNN 2 The Proposed Project consists of highway and intersection improvements and will not increase traffic. Please see RTC B1, B2 and C1. The use of the existing shoulders along SR-94 is consistent with the County of San Diego's Bicycle Transportation Plan which classifies SR-94 as a Priority 1 Bikeway as either a shared facility (Class III) or Share-the-Road signage corridor.

The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. For all the improvements, a minimum 8-foot shoulder would be provided, where bicycles would be able to travel as they do under existing conditions.

NNN 3 The SR-94 Improvement Project will implement a Caltrans approved transportation management plan that will ensure traffic flows are not significantly impacted during construction activities. Section 2.4.4 of the Final EIR states that a public awareness campaign (PAC) would be implemented as part of the TMP. The purpose of the PAC would be to provide an opportunity for the public to plan travel within the affected areas during construction periods. Please see Mitigation 2.4.4 (2)(a) (Final EIR Section 2.4.4) for full details of the PAC.

NNN 4 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
-----Original Message----- From: Sent: Monday, August 10, 2015 10:49 PM To: CT Public Information D11@DOT Subject: Contact Us Form Below is the result of your feedback form. It was submitted by () on Monday, August 10, 2015 at 22:49:02 ---------- Name: Judy McDaniel Email: jdmcda@gmail.com City: El Cajon, 619-588-1696 OOO 1 Comments: Have you considered the large motorhome traffic on 94 going to and from East County to the Thousand Trails park on OTAY Lakes Road? It will be one big bottle neck trying to get past the casino and beyond ----------	OOO 1 The transportation analysis included in the Final EIR took into account existing heavy vehicles and recreational vehicles assumed to travel along SR-94.

COMMENTS	RESPONSES
The Mulder Family 3394 Beaver Hollow Road • Jamul, CA 91935 Jmulder02@gmail.com August 27, 2015 Mr. David Nagy Environmental Branch Chief California Department of Transportation, District 11 4050 Taylor St. MS242 San Diego, CA 92110 RE: Comments on Caltrans Draft Environmental Impact Report – State Route 94 Improvement Project. Dear Mr. Nagy: We are sending this letter via email to you in order to get it in within your deadline of today, August 27, 2015 for public comments on what we feel is a totally inadequate Draft Environmental Impact Report (DEIR) on the State Route 94 Improvement Project for CEQA. As you know, the DEIR was brought about because of the possible addition of over 9000 cars due to the Jamul Indian Village (JIV) Jamul Casino proposal. PPP 1 Our concerns on this project are many, especially in the area of traffic. To even suggest that, making minimal improvements to the five intersections they propose, would mitigate the huge increase in traffic is reprehensible! Creating an additional lane for "storage" of cars waiting for a light to change, then dropping back to two lanes, only to add another lane at another intersection. This is particularly true when we ask the traffic to go from four lanes to two at the Sweetwater Bridge, which gives a new dimension to the definition of "choke point" as the plans then call for SR-94 to return to the extra lanes up to Millar Ranch Road. This is totally unsafe and widening of the bridge over the Sweetwater River should be mandatory mitigation in order to avoid that "choke point" which is sure to cause accidents, especially when one considers it is just before Cougar Canyon Road which is the driveway into Steele Canyon High School with its bank of very young, inexperienced drivers PPP 2 Another problem we see with the traffic analysis is that the DEIR does not consider the problems our residents and visitors will have coming off the side streets onto SR-94 with the increased traffic. Safety alone calls for acceleration and deceleration lanes, and with every iteration of this project, we personally have brought this dangerous situation to the attention of the traffic engineers, especially as it manifests itself at the Otay Lakes Road intersection which will be an important route for future casino customers from South Bay. The Jamul Dulzura Community Planning Group has given you a list of County roads that will be directly impacted and asked the JIV be mandated to work with the County on this problem. SR-94 is also impacted by these side roads and driveways, as the drivers will be entering and leaving the state highway at great risk for their lives with accidents not only possible, but probable! PPP 3 Jamul Dulzura Community Regional Plan emphasizes a goal of encouraging development in such a manner as to **retain the rural atmosphere of the community,** which is a key	PPP 1 Please see RTC B1, B2 and C1. Also, please see RTC H4 regarding the "choke point" concern along SR-94 just north of the Sweetwater Bridge. PPP 2 The Proposed Project consists of specific roadway improvements designed to address traffic increases resulting from the JIV gaming facility. Please see RTC III1. These traffic improvements do not generate traffic and would not adversely affect Otay Lakes Road or side streets and driveways along SR-94. Section 2.4 Traffic and Transportation of the Final EIR demonstrates that the operations at the intersection of SR-94/Otay Lakes Road will not change with the implementation of the Proposed Project. To the extent that the commenter's concerns deal with the JIV Gaming Facility Project, please see RTC B1, B2 and C1. PPP 3 Final EIR Section 2.2.3 Growth Environmental Consequences addresses the issue of growth inducement. Page 2.2-2 of the Final EIR states that the JIV could proceed with the Gaming Development Project with or without the SR-94 Improvement

COMMENTS

PPP 3 cont

area in our Jamul Dulzura Community Plan. See page 2.1-14 to 50 in the DEIR, as the proposed improvements do not take these goals into account as road widening alone encourages growth and is therefore growth inducing. The increase in number of vehicles violates the Mobility Goal 3; Policy #15 which states, "to encourage the elimination of safety hazards caused by direct access onto major arterial"…and further "In particular, new commercial development shall have limited access to such roads". The DEIR concludes that "since the Access Road Alignments would not result in a new connection to a major arterial or collector streets; therefore this Access Road Alignments is considered consistent with Policy #15" which is flagrantly false as the huge increase in number of vehicles alone would be a safety hazard not adequately mitigated by the addition of a couple of signals and modification of five intersections!

PPP 4

In addition, the DEIR makes the statement on 2.1-26, "The selection of the Melody Road Access Alignment by itself, would not encourage growth in the rural area of the 87-acre parcel located between Melody Road and the JIV Tribal Lands because the existing MSCP discourages future urban uses from being constructed on this parcel." The statement neglects to take into account that the 87-acre parcel is owned by Lakes Gaming (who had a previous proposal to use it for a hotel and event center for their casino development) and that today Penn National has a ten-year option to buy this 87-acre parcel. One of their principals made a statement at a public meeting that they intended to have a hotel and extensive shopping "nearby", so one cannot assume their access would not encourage growth and, in fact can infer, from the Penn National Executive's statement, that it is planned for future growth! Another reason it is important for Caltrans to ensure that mitigation measures are adequate to protect the safety of the people who traverse SR-94 today and in the future!

PPP 5

When one reads the DEIR, one is led to believe that Alternative 1 or Alternative 2 (with its different versions) would be the preferred alternative. We feel this is totally incorrect and refer to the fact that in many meetings and letters Caltrans has gone on record as preferring the Melody Road access (Alternative 3) which is by far the safest and most likely to produce the fewest traffic problems. Caltrans has been most judicious in their minimally allowing access for major traffic on and off of SR-94, requiring the use of Melody Road instead for private developments. This project should have to follow the same requirements thereby eliminating the problem of 9000 cars trying to ingress and egress off of the windy SR-94, which you need to remember is our primary access in and out of our community. In case of emergency, this is of the utmost importance!

Thank you for taking the time to read our letter detailing some of our concerns. We would urge you to follow CEQA and require greater improvements to mitigate the most significant impacts especially in the dangerous area of traffic to ensure safety.

Janet and Gerald Mulder
3394 Beaver Hollow Road
Jamul, CA 91935
619-588=5672

RESPONSES

PPP 3 cont. Project. Given this, the SR-94 Improvement Project would not be considered growth inducing. Please see RTC B1, B2 and C1. Please see RTC H4 regarding the "side street" concerns along SR-94.

PPP 4 Before the MSCP was implemented, the entire 87-acre parcel was developable. The purpose of the MSCP is to locate future development in appropriate places and consolidate land preservation requirements into large preserves that have greater ecological functions than smaller, disbursed preserves. On the 87-acre parcel, implementation of the MSCP resulted in the designation of approximately half of the 87-acre parcel's land area as Hardline Preserve, which made it undevelopable. Thus, the MSCP does in fact discourage future urban growth in biologically-sensitive areas by designating these areas as hardline preserves or pre-approved mitigation areas.

Selection of the Melody Road Access Alignment would claim additional areas that are developable on the 87-acre parcel. This would result in less acreage available on the 87-acre parcel for development. More importantly, the Melody Access Road is not needed for development of the 87-acre parcel. The 87-acre parcel could be developed whether or not an access road is built, and whether or not a gaming facility is built on the adjacent JIV. Since development of the 87-acre parcel is not contingent on the construction of an access road to the JIV, it seems reasonable to conclude that an access road to the JIV will not induce growth on the 87-acre parcel. Finally, note that the project description of this Proposed Project does not involve construction of a gaming facility.

PPP 5 Please see RTC I11.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

PPP 6

PPP 7

Comment: It is disgraceful that the owners of the businesses at Steele Canyon (south side of SR94) were not informed that their frontage parking spaces were to be removed. This will possibly eventually make some of them have to quit their business. Please sit down & check out the need for that extra lane that makes the taking of this property necessary.

(Optional information, please print.)

Name: Janet Mulder

Organization: JDCP 6

Address: 3394 Beaver Hollow Rd Jamul 91935

Phone: 619-1885672 E-mail: jmulder02@gmail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\ SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

PPP 6 As noted in the Final EIR, the implementation of the improvements at the intersection of Steele Canyon Road and SR-94 would have a short term impact to the parking supply of some of the nearby businesses. As stated on page 2.3-9 of the Final EIR, prior to construction of the proposed roadway improvements at the intersection of SR-94 and Steele Canyon Road, the landowners and business owners affected by construction and implementation of the improvements would be contacted in advance of any potential approval for parking reconfiguration or replacement as a result of the Proposed Project. It is anticipated that as part of the Project, additional parking spaces could be provided to support the existing businesses. In addition, coordination of the construction phasing for the improvements, which would be constructed to minimize the temporary parking impact during construction, would include the existing business and property owners affected by the construction. At the completion of the improvements, the existing parking spaces currently within Caltrans ROW would be eliminated. The final parking configuration of the existing businesses adjacent to the proposed improvements would need to be compliant with the County of San Diego's parking requirements.

PPP 7 The improvements at the Steele Canyon Road and SR-94 intersection were designed to increase queuing capacity at the intersection and decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, acceleration and deceleration lengths were designed per Caltrans Highway Design Manual and the California Manual on Traffic Control Devices.

Having a second lane in the eastbound direction would facilitate and enhance the access for the businesses along the south side of SR-94, as the second lane would provide an opportunity for a slower lane of traffic for vehicles making a right-turn movement. The existing two-way left-turn lane along SR-94 would be maintained to facilitate the movement in and out of the existing driveways.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment: ① Cal Trans needs to make sure the JIV adds the ingress & egress by our local roads that access off of SR94. This is serious safety issue. Please make sure that Vista Sage, Vista Drive, and Otay Lakes Road (among others) have adequate safe ingress + egress. They should have to ensure this safety before casino operation — not just pay their "fair share" because they are bringing in an additional 9000 ADTs by their own figures. Please also look at Millar Ranch Road — in an emergency it would spell disaster.

② More work needs to be done — 2 lane bridge at Steele Canyon High is a choke point and going from 4 lanes to 2 & back to 4 is a risky proposition. The JIV needs to be responsible for replacing the bridge (Only)

PPP 8

PPP 9

PPP 10

PPP 11

(Optional information, please print.)

Name: Janet Mulder JANET MULDER

Organization: JAMUL DULZURA COMM. PLAN. GROUP

Address: 3394 Beaver Hollow Rd JAMUL CA 91935

Phone: 619-588-5672 E-mail: jmulder02@gmail.com

How did you hear about this meeting? mail + JDCPG minutes

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

PPP 8

Please see RTC B1, B2, C1 and C6.

The gaming facility currently under construction is not the Proposed Project. Please see RTC B1, B2, C1 and C6.

PPP 9

The gaming facility currently under construction is not the Proposed Project. The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1, B2 and C1. The Proposed Project will ameliorate traffic impacts and improve traffic movement.

PPP 10

The intersections and roadway segment improvements included in this Final EIR were derived from the analysis included in the Final Tribal Environmental Evaluation prepared for the JIV gaming facility (Final Tribal EE, 2013), as mitigation measures for the JIV gaming facility's direct traffic related impacts. The proposed improvements evaluated in the FEIR do not warrent the evaluation of Millar Ranch Road. The footprint of the improvements would not affect this intersection of roadway.

Please see RTC B1.

PPP 11

Adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54– Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.

COMMENTS	RESPONSES
Mulder cont.	
PPP 12 In addition students are walking along SR94 on a makeshift path and traffic on SR94 will be too fast + too heavy not to have JIV provide a safe sidewalk for the students. Cougar Canyon Rd is another ingress + egress that has lot of traffic and needs mitigating –	PPP 12 The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1, B2 and C1. The Proposed Project will ameliorate traffic impacts and improve traffic movement. Furthermore, the intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulleting (DIB) 82-05, with includes "Pedestrian Accessibility Guidelines for Highway Projects".
PPP 13	PPP 13 The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1, B2 and C1. The Proposed Project will ameliorate traffic impacts and improve traffic movement.
PPP 14 (3) Steele Canyon Road or Jamul Drive will both be "shortcuts" to the casino and need to be taken into consideration in their deliberations.	PPP 14 The gaming facility currently under construction is not the Proposed Project. The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1, B2 and C1. The Proposed Project will ameliorate traffic impacts and improve traffic movement.

COMMENTS	RESPONSES
From: Rob Murphy **To:** SR94_SR_94_Draft_EIR@DOT **Subject:** hwy 94 work **Date:** Thursday, August 27, 2015 9:31:40 AM QQQ 1 Id like to point out a major flaw in the planned hwy 94 improvements. They are of course due to an anticipated major increase in hwy 94 traffic. Given this fact, have you considered what the massive congestion on 94 will do to traffic flow on the other highways connected to 94 ? At the moment the Jamacha and 94 intersection is in grid lock at about 5pm and backs up several miles in the direction of hwy 125. Now add 1000's of "new" cars to this lineup, dont you think that all hwys that connect to 94 will feel this backup ? There WILL be a backlash of this project through any hwy that connects to 94 dont think it wont. Has Caltrans analyzed this traffic flow issues I speak of ? If not perhaps you should make a model and calculate the terror you are about to unleash on San Diego, -- Rob	QQQ 1 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
RRR 1	RRR 1 Thank you for the comment. The implementation of the "no right-turn on red sign" will be evaluated as part of the preparation of the final plans for the Project.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8.5.2015

Comment:

Intersection of Jamacha Blvd & SR94.
There needs to be a "NO TURN on RED"
for the right-turners coming (RIGHT) N into 94.
People on 94 heading East on 94 have to
brake because the right-turners do not
appreciate how fast the east bound traffic
is

(Optional information, please print.)

Name Nancy Morrell
Organization Concerned citizens of Jamul
Address 13550 Vista Sage Lane Jamul CA 91935
Phone 619-741-9496 E-mail everbeisbol@yahoo.com

How did you hear about this meeting? email

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS

From: Lorna Odegaard
To: SR-94_SR_94_Draft_EIR@DOT
Subject: SR 94/Campo Road, accident reporting, and gridlock, Lorna Odegaard
Date: Thursday, August 27, 2015 3:50:19 PM

Dear Sirs

SSS 1 This is the second time in a couple of weeks that your lack of or knowledge for reporting road closures has failed.

SSS 2 We had another one today 94/Steele Cyn Road, Jamul and no mention of the shut down for two hours??? Get your head out of the sand and realize just how much additional traffic going to and from the proposed Casino in Jamul will impact traffic going East and people coming West from Dulzura, Potrero, Tecate, and Otay. Well I'll tell you how they will get around this entire mess if an accident occurs between Honey Springs and Rancho SanDiego, they will have to travel thru Honey Springs Road, back up Otay Lakes Road, or head back out toward Potrero for road access. Have you seen the condition of the roads lately? Honey Springs Road is full of potholes, and now over whelmed with bicycle riders from Hollenback parking. Cars can't even travel up Honey springs safely

SSS 3 I was traveling from Honey springs Road heading toward the Casino last Saturday afternoon, where the signs clearly state "do not pass". Bull roar, at least a couple of cars passed me when I was doing 45, too dam slow you know. All of this is due to cross traffic from the casino and the workers crossing the street to and from the parking area, crossing where no sane person would try to do so.

The state has failed us again, and Cal Trans is an over stuffed money guzzling over staffed department, who could give a rat's hairy back about the community.

Cal Trans puts up a really good front with all the community involvement, but it is just lip service from empty suits and skirts.

I think I will call Mr. Trump to see if we can get a reaction, he is the ONLY one that has a sane outlook lately!

Lorna S. Odegaard
20019 Deerhorn Valley Road
Jamul, CA 91935

RESPONSES

SSS 1 The comment is directed at accident reporting and not the SR-94 Improvement Project. The comment is noted and forwarded to the decision makers for their consideration. No further response is required.

SSS 2 Please see RTC SSS1 and B1.

SSS 3 The comment is directed at anecdotal evidence of recent traffic operations on SR-94. The comment is noted and forwarded to the decision makers for consideration.

COMMENTS	RESPONSES
From: Shelly Blue **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** CALTRANS SR 94 IMPROVEMENT PROJECT **Date:** Thursday, August 27, 2015 4:14:08 PM Re: CALTRANS SR 94 IMPROVEMENT PROJECT TTT 1 The complete disregard for life and safety by Caltrans on SR 94 is unacceptable. I have to drive SR 94, I don't want to die on it. I know I don't have the casino's deep pockets, but I would still like to believe that lives hold more value than wallets. Progress at any cost is not progress at all. Michelle Owens	TTT 1 The traffic analysis presented in Chapter 2.4 of the Final EIR shows that the Proposed Project would improve traffic through the project site as a whole. Please RTC B1, L1.

COMMENTS

Department of Transportation
District 11
4050 Taylor St. MS 240
San Diego, CA 92110

ATTN: Bill Figge, Deputy District Director

Aug. 21, 2015

RE: JIV/Penn CEQA for State Route 94

Mr. Figge:

My family has been a Jamul resident for more than 20 years, and east county San Diego citizens our entire life. I am writing you against Catrans and the proposed Jamul Casino.

UUU 1 Highway 94 is a very dangerous highway with a current "F" rating. Caltrans is allowing this illegal casino to cause traffic in our rural area to be a nightmare. Cars are parked on the side of the highway at 5:10 am and the traffic is stopped on 94 at times for more than 30 minutes to just get casino employees into the job site. This is horrible and it looks to only get worse.

UUU 2 Caltrans has no mitigation for this highway and our community. There is no mitigation for Jamul citizens to Caltrans proposal to mitigate the proposed traffic into this illegally built casino structure. The material review period time was insufficient. the EIR document is flawed and fails to address our communities' public safety. Public safety is currently being compromised with a crosswalk through a state highway. Where else in this country is a crosswalk in the middle of a state highway allowed? Caltrans has purposely not listened to what our community needs. The government is to work for the people. This process on highway 94 is the complete opposite. Jamul and East County citizens have spoken out numerous times to STOP this madness.

UUU 3 A local developer from Peaceful Valley Ranch had a project in the books for 10 years and Caltrans forced this person to move the entire entrance to this project to Melody road due to safety concerns. The original entrance / exit to this ranch was exactly opposite of JIV casino project. So why????? is this not the same for a huge project with thousands of people using the road. People are going to be killed on Highway 94 just because of this lack of concern.

UUU 4 I currently live on Hillside Drive and have to wait more than 20 minutes, when casino employees leave their job, to just turn onto Hwy 94. Where are the traffic lights? I know the developer of Peaceful Valley Ranch was to place one at Melody Road, yet the casino has to do nothing? This is crazy.

RESPONSES

UUU 1 Please see RTC B1, B2 and C1.

UUU 2 The Final EIR has been prepared in accordance with the substantive and procedural requirements of CEQA, and Caltrans has consulted other public agencies and the public in the process. As to the JIV gaming facility, please see RTC B1, B2 and C1.

UUU 3 Please see RTC PPP5.

UUU 4 The commenter inquires as to traffic mitigation measures for the JIV gaming facility. The SR-94 Improvement Project represents a substantial component (everything other than payment of traffic impact fees) of the traffic mitigation measures identified for the JIV gaming facility in the Final TEE. The function of the Proposed Project is to address traffics impacts projected from the JIV gaming facility.

COMMENTS	RESPONSES
UUU 5 Finally, Caltrans has failed to serve the public trust by allowing an exemption for San Diego Gas and Electric to run a new power source specifically to operate a commercial enterprise along Hwy 94 without a CEQA or proper mitigation.	UUU 5 Please see RTC LLL3.
UUU 6 I want to go on record that the CEQA is flawed, biased document that has completely failed the taxpayers of California and especially Jamul. There is no mitigation and Caltrans needs to stop this process.	UUU 6 Each sub-section of Section 2.0 Environmental Setting, Impacts and Mitigation Measures contains an Avoidance, Minimization and Mitigation Measure section. Measures were listed for each significant impact found for the SR-94 Improvement Project.
Jocelyn Parker 14131 Hillside Dr. Jamul, CA 91935 J. Parker 8-21-15	

COMMENTS	RESPONSES
From: patrick parker **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Caltrans and State Hwy 94 mitigation - To David Nagy **Date:** Wednesday, August 26, 2015 6:51:18 PM Mr. David Nagy, I, Jocelyn Parker want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed. Caltrans has failed the State and California taxpayers- especially those in Jamul. UUU 7	UUU 7 Please see RTC DD1.
There s not proposed mitigation for Steele Canyon High School / Cougar Canyon. There is too much traffic in and out of this school as it is without added casino traffic. UUU 8	UUU 8 Please see RTC L1, B1, B2 and C1.
There is not proposed mitigation for stop lights along Highway 94 so residence who live on an entrance to State Highway 94 can access this highway safely. (Some of those include:Hillside Drive, Las Palmas, Peaceful Valley Ranch Road,' Vista Sage Rd., Otay Lakes Rd., Honey Springs Rd., and so many more). As it is, without an open casino, it is almost impossible to enter onto Highway 94 during he 7 am hour and the 3:30 - 4:00 hours, due to casino workers going and coming from work. JIV is required to do a CEQA clearance before their implementation of construction, yet this has never been done. UUU 9	UUU 9 Please see RTC L1, B1, B2 and C1.
The material review time has been insufficient. The EIR document is flawed and fails to address the community and public safety. Caltrans has repeatedly failed to listen to our community concerning the safety issues of highway 94 - an "F" rated highway. UUU 10	UUU 10 Please see RTC TTTT1
There are so many more issues that need to be addressed before Caltrans even touch highway 94. There is no mitigation for these improvements and to casino traffic. UUU 11	UUU 11 Please see RTC L1, B1, B2 and C1.
Jocelyn Parker 14131 Hillside Dr. Jamul, CA 91935	

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

RE: Via Las Faldas intersection Date: 7/5/15

Comment:

VVV 1

• The road "improvements" will do little to help traffic flow on/off Via Las Faldas. In fact, it will be worse. Hundreds of residents use Via Las Faldas to access a exit from the Strip Mall. Rather than cross 2 lanes of traffic turning left from Via Las Faldas, we will be forced to cross 4 lanes, making this turn even more dangerous than before. The proposed turn lane (turning right onto Steele Canyon Rd) will cause cars to block Via Las Faldas during high periods of traffic conjestion.

VVV 2

• Currently, cars frequently use the center turn lane as a passing lane. How will the new changes prevent that?

VVV 3

Semi-trucks frequently park on the side of the road at the intersection of Via Las Faldas (north side) blocking vision of those turning left from Via Las Faldas. My neighbors & I have asked for "No parking" signs, to no avail (we've asked Caltrans ... letters + power point sent).

VVV 4

• The speed limit must be reduced. 55 is too high especially w/ additional traffic and high School students driving.

(Optional information, please print.)

Name: Linnea Peltola

Organization: Resident

Address: 3282 Via Las Faldas, Jamul 91935

Phone: (619) 669-0814 E-mail: linneaea@cox.net

How did you hear about this meeting? Facebook

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

VVV 1 The evaluated improvements at the SR-94/ Steele Canyon Road intersection would not modify the operations at the SR-94/Via Las Faldas intersection. The roadway widening will start west of Via Las Faldas (in the westbound direction) and will be merge with the existing travel lane just east of Via Las Faldas (in the eastbound direction). It is anticipated that the additional storage capacity between Via Las Faldas and Steele Canyon Road will facilitate the movement of vehicles turning right or left from Via Las Faldas to SR-94.

VVV 2 The improvements don't address instances where vehicles travel along the center lane of the roadway dedicated for left-turn only movements. The analysis assumes lawful use of the highway system. The comment will be forwarded to the Caltrans decision makers for future consideration.

VVV 3 The request for "No Parking Signs" on the north side of SR-94 at the Via Las Faldas intersection will be forwarded to the Caltrans decision makers for consideration.

VVV 4 Changes to the speed limit along SR-94 is not included and or evaluated as part of this project. Please see RTC III1. The existing speed limit of 55 miles per hour is consistent with the speed limits of 2-lane Conventional Highways in California. A separate evaluation would need to be conducted to evaluate whether or not the speed along the SR-94 corridor could be reduced or modified.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment: I have several concerns:

WWW 1 ① There is a proposed two-lane turn from SR 94 onto Campo Road in Rancho San Diego. Less than a mile from that intersection is a two-lane bridge (before Millar Ranch Rd). This will create a huge bottleneck. There is no proposal to widen this bridge.

WWW 2 ② I retired one year ago as the CEO/Principal of Steele Canyon High School. Almost every year, we awarded graduation diplomas posthumously. Every year 1,000 new or near-new drivers drive Hwy 94 to school. It is already a dangerous road. Now however, these new drivers will be travelling along the same route as visitors to the casino who very often will have been drinking and gambling all night. Isn't there some way to provide a barrier that would prevent drivers from drifting over into on-coming traffic?

WWW 3 ③ SCHS traffic from 7-7:30 AM and 2:40-3:10 PM every day creates a terrible traffic jam for the entire community. Can't this issue be addressed? There are numerous instances of traffic accidents on file.

(Optional information, please print.)

Name Eileen Poole

Organization Jamul Dulzura Community Planning Group

Address 3209 Pleasant View Lane Jamul 91935

Phone (619) 669-0404 E-mail epoole619@gmail.com

How did you hear about this meeting? at a Planning Group meeting

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

WWW 1 The Tribal Environmental Evaluation prepared by the Jamul Indian Village (JIV) gaming project identified the need for permanent improvements to the State Highway System. Therefore, subject to Caltrans' oversight and independent review, the JIV is responsible for the development of a CEQA Environmental Impact Report for the improvements within the State right of way and the necessary mitigation for any impacts to traffic on SR-94.

The addition of a second eastbound right-turn lane at the intersection of SR-94 and SR-54– Jamacha Road was included as one of the needed permanet improvements per the Tribal EE. This improvement would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.

The widening of the bridge north of Millar Ranch Road was not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR.

WWW 2 The gaming facility currently under construction is not the Proposed Project and Caltrans has no authority over its construction or operation. The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1, B2 and C1. The Proposed Project will ameliorate traffic impacts and improve traffic movement.

WWW 3 Resolving Steele Canyon High School existing traffic conditions is outside the scope of the Project. Additional impacts to this location would not result from the SR-94 Project. The comment will be forwarded to the Caltrans decision makers for future consideration.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date:

XXX 1

Comment: 94 is already a dangerous road, just look at the statistics. What is going to be the outcome of thousands more cars a day? think of the potential danger that we are putting in front of our youth going to and from school.

Again Wording... "94 Improvement Project" What a farce! Leave it Alone!!!

It is a shame that "money talks".

XXX 2

The proposed casino does not have a Reservation in Jamul. Those few acres were given to members of the Viejas Tribe - it is not a Reservation! It is illegal, since ~~[illegible]~~ those few acres are not a Reservation. What will this do to the water table for those who rely on a well.

(Optional information, please print.)

Name Verna Poorbaugh

Organization

Address 13923 Proctor Valley Rd Jamul 91935

Phone 619 669-0531 E-mail jvpoorbaugh@earthlink.net

How did you hear about this meeting? email SAC

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

XXX 1 The gaming facility currently under construction is not the Proposed Project and Caltrans has no authority over its construction or operation. The Proposed Project would not generate additional traffic and therefore will not add any traffic to SR-94 or any roads along or off of SR-94. Please see RTC B1, B2 and C1. The Proposed Project will ameliorate traffic impacts and improve traffic movement.

XXX 2 Please see RTC E10.

COMMENTS

From: Mary Jane Quinn
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Cal Trans SR 94 IMPROVEMENT PROJECT
Date: Thursday, August 27, 2015 6:41:22 PM

Dear Cal Trans,

YYY 1 Today on SR 94 there was another fatal accident which blocked access for people both driving into and out of Jamul. Last week an overturned truck on SR 94 near Dulzura had traffic at a stop for over 8 hours.

This highway, the major route in and out of Jamul, is one of the most dangerous highways in the entire state of California. The addition of a casino on this road is tantamount to suicide. With thousands of more trips made daily on an already deadly road, with few to no mitigations, has the community of Jamul worried and frustrated.

YYY 2 Not only will SR 94 be negatively impacted, but Otay Lakes Rd., the only access to Eastlake and Chula Vista will also see a dramatic rise in traffic and accidents. There have been no mitigations offered to address that problem.

YYY 3 In case of a fire evacuation or other major disaster the results could be catastrophic.

Sincerely,
concerned community member,

Mary Jane Quinn

RESPONSES

YYY 1 Please see RTC L1, B1, B2 and C1.

YYY 2 Please see RTC L1, B1, B2 and C1.

YYY 3 The Proposed Project would not make the JIV gaming facility and its associated traffic referenced in your comments more or less likely; the JIV gaming facility has already been approved. As part of the Proposed Project, a number of signalized intersections would be equipped (installed or upgraded) with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). These sensors, as well as the focused turn lane improvements provided as part of the project, would be expected to facilitate fire/emergency response and to be an improvement over the "No Build" condition. Also, please see RTC LLL4.

COMMENTS

From: Celeste Shenas
To: SR-94_SR_94_Draft_EIR@DOT
Subject: SR-94 Proposed Changes to Mitigate Casino traffic
Date: Wednesday, August 26, 2015 5:37:56 PM

Hello,

Here are some of the many errors and flaws that I personally noted during the public meeting in regards to SR-94 Improvement Project.

ZZZ 1 1. The plan does NOT address traffic coming from the east, heading west on SR-94. The eastern Chula Vista area, via Otay Lakes Road is a huge community, (pop. 82,943) and Otay Lakes to SR-94 west is the easiest, quickest way to get to Jamul from Chula Vista. I use this road myself whenever I need to go to Chula Vista. This stretch of road (SR-94 from Otay Lakes Road to Melody Lane) is notoriously dangerous, particularly due to drivers passing where there are double solid lines. There is a dangerous intersection at Rancho Jamul Drive where this illegal passing takes place daily. There have been fatalities, one in particular that I remember of a woman returning from a party in Mexico (yes, this portion of the road contains many, many drivers from across the border on their way to work), crossed the double line, went head-on into and killed a motorcyclist and his 12 year old passenger. **To ignore this pathway to the Jamul area is nothing short of negligent.**

ZZZ 2 2. Proposed SR-94 & Jamacha Road Improvements: The additional turning lane from Campo road onto SR-94 (Campo) creates a plug, especially during school traffic times.

ZZZ 3 3. SR-94 at Steele Canyon Road: In this area of proposed staging, (Steele Canyon Produce, Bravo Cafe, California Sol restaurant), there is a grove of ancient California Live Oak trees. How will the burial (to create accessible parking for the businesses) or removal of an old growth fores be mitigated? Trees are important, they make the stuff we breathe.

ZZZ 4 4. SR-94 and Lyons Valley Road: Again, loss of Ancient Oak forest, see item #3.

ZZZ 5 5. Peaceful Valley Ranch Road: This is the Fire Department's exit road. The addition of thousands of trips per day to this area will increase emergency wait times. When there is a collision in the area, which there will be, how are we to be able to get the help we need if our Fire Department is stuck in traffic/blocked in?

ZZZ 6 6. Bike Lanes: There are ever fewer riding lanes in the "country". Adding more cars to this dangerous area, depending upon a plan like this is the wrong thing to do. People will be killed.

ZZZ 7 7. Bus stops: Why all the additional bus stops? Road-choking traffic and you want to have slow moving vehicles that frequently stop added to the mix? Please! This is not an urban area, get someone who knows how rural areas work and why we do not need a bus line out here. As an aside, ALL casino businesses have their own buses, so save the taxpayers (us) some money and let them pay for whatever transportation they need.

ZZZ 8 8. Light Pollution: Stop lights and the intersections they are in need to be lit. This does not

RESPONSES

ZZZ 1 Please see RTC L1, B1, B2 and C1.

ZZZ 2 The intersection and roadway segment improvements included in this Final EIR were derived from the analysis included in the Final TEE prepared for the JIV gaming facility, as mitigation measures for the JIV gaming facility's direct traffic related impacts.

Adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54/Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.

ZZZ 3 There are no trees in the SR-94 /Steele Canyon Intersection Improvement Area. No impacts to oak resources will occur from implementation of the SR-94/Steele Canyon Intersection Improvements.

ZZZ 4 There are no trees in the SR-94/Lyons Valley Intersection Improvement Area. Improvements to the SR-94/Lyons Valley Road Intersection would impact 0.1 acre of coast live oak riparian forest due to the need to clear vegetation for improved line of sight (see Final EIR Section 2.16.2). Mitigations measures, which include land preservation requirements of 0.2 acres of coast live oak riparian forest, were identified in Section 2.16.3 of the Final EIR.

COMMENTS	RESPONSES
	ZZZ 5 The Proposed Project would not result in additional trips on SR-94. Please see RTC B1. The Proposed Project would only implement focused improvements relevant to the State Highway System. The potential for a collision to occur at a point in time when the Fire Department would be blocked from responding is a possible, but speculative, event that does not require analysis under CEQA. Regardless, as part of the Proposed Project, a number of signalized intersections would be equipped (installed or upgraded) with emergency traffic control activating strobe light sensors (emergency vehicle preemption sensors). These element upgrades would result in a fire/emergency response condition that would be an improvement over the existing condition. Although unrelated to the Proposed Project, it is also noted that the JIV gaming facility incorporated an additional JIV Fire Department, which is intended to enter into a Mutual Aid Agreement with other area fire agencies. The JIV Fire Department would provide both additional fire and emergency medical response services in the area.
	ZZZ 6 The SR-94 Improvement Project will not add more cars to SR-94. Please see RTC B1.
	ZZZ 7 The proposed intersections and roadway projects would update existing bus stops along SR-94 that currently do not meet Caltrans or the San Diego Metropolitan Transit System bus stop standards. Only one additional bus stop is proposed, to be located at the site of the potential new traffic signal at the JIV gaming facility entrance (Daisy Drive, Reservation Road or Melody Road depending on which access alternative is selected as the preferred alternative). The upgrades of the existing bus stops were not a result of anticipated transit ridership, but as a standard procedure for when intersections and roadway segments are improved. The goal for all transportation improvements is to bring existing conditions to current standards.

COMMENTS	RESPONSES
	ZZZ 8 The stop lights are isolated features that would be located in defined areas generally adjacent to or in the vicinity of other existing or planned development. In two of the three locations, there are already existing signals. Regardless, the associated street lights are directed toward road users. They are not focused upward and do not substantially add to light pollution. Similarly, any lighting of pedestrian/bike areas at intersections would be focused downward, toward the pavement. This safety lighting is necessary and would be both focused and shielded. It therefore would not result in substantial glare, nor would it result in substantial light "spill." As noted on Draft EIR page 2.6-18 through 2.6-21, Project-related lights generally would not result in a new source of light or glare that would significantly impact day or nighttime views in the area. Consistent with the comment, one alternative, Alternative 3, was identified as resulting in a new source of light or glare that would (pre-mitigation) significantly impact day or nighttime views (Draft EIR page 2.6-22).

COMMENTS

go with the harmony of a rural area.

ZZZ 9

9. Alcohol: Whether or not a business like a casino has a liquor license, people are drinking on their premises. A family member of ours is a contractor who did some improvements on the Sycuan casino area, before they were granted a liquor license. As a contractor, he began work early in the morning. Each morning, as he passed through the parking area, he saw that it was littered with empty liquor and beer bottles. People are getting drunk in the parking lot, entering the casino, and leaving the premises, all while under the influence of alcohol. That means drunk driving. On a hugely dangerous stretch of the road. Mitigate that.

ZZZ 10

10. Traffic at Steele Canyon High School (12440 Campo Road): 2,200 students, half of which are new drivers or have one year of driving experience. Each year at commencement, the principal has to give diplomas to family members of students who have died in car accidents, most of which take place along SR-94. Currently, the wait (between 7-8:30 am) to enter the campus is 25 minutes. The traffic stretches east to Steele Canyon Road, and west all the way to the SR-94/54 junction. This same wait occurs each afternoon. Nothing in your plan addresses this situation.

ZZZ 11

11. The widening and almost immediate merging back into one lane that, in this plan, occurs over and over: This does nothing but encourage road rage. This creates conflict of space "ownership" that is only exaggerated with additional cars. This is bad idea.

In closing, I encourage you to go back to the drawing board, throw out the "40 year plan" and make some real changes that support safety in this corridor. We all deserve better from our paid public servants.

Celeste Shenas

RESPONSES

ZZZ 9 The commenter refers to the JIV gaming facility, not the SR-94 Improvement Project. Please see RTC L1, B1, B2 and C1.

ZZZ 10 Please see RTC L1, B1, B2 and C1.

ZZZ 11 The intersection and roadway improvements evaluated in the Final EIR include roadway widening that provides additional travel lanes that then merge onto the existing travel lane only at the intersection of Steele Canyon Road. The improvements at the SR-94 and Steele Canyon Road intersection were designed to increase queuing capacity at the intersection and decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, acceleration and deceleration lengths were designed per the Caltrans Highway Design Manual and the California Manual on Traffic Control Devices.

At the intersection of SR-94 and Jamacha Road/SR-54 , an additional eastbound right-turn lane would be added. Adding the proposed second eastbound right-turn lane at this intersection would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.

COMMENTS	RESPONSES
	ZZZ 11 cont At the intersection of SR-94 and Maxfield Road , an acceleration lane would be added to improve the vehicular delay and corner sight visibility for vehicles entering SR-94 from Melody Road. The length of the acceleration lane evaluated in the Final EIR would meet Caltrans Highway Design Manual standards. Lastly, two of the access alternatives evaluated would construct an additional southbound through lane at the intersection of Melody Road and SR-94. This additional travel lane would become an exclusive right-turn lane at the JIV gaming facility driveway entrance. The Final EIR includes an evaluation of the operations of these two intersections and found them to meet Caltrans design standards.

COMMENTS	RESPONSES
From: mike sisson **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Serious Shortcomings to the Proposed "Mitigations" **Date:** Wednesday, August 26, 2015 11:23:54 AM To CALTRANS Staff: The prospect of increases in traffic on SR-94 that are estimated in the tens of thousands of average daily trips is frightening on many levels. We already see fatalities and serious injuries frequently on this road. The difficulty of accessing SR-94 from any of the sideroads intersecting in the projected area is ALREADY unacceptable and dangerous. And not insignificant is the diminution of property values as travel too and from homes in Jamul becomes notoriously difficult. Turning our neighborhood into a war zone and at the same time not really relieving the serious shortcomings of this highway is also unacceptable. If it can be shown that the road as modified contributes to deaths and injuries, the State will almost surely become a defendant in a torrent of lawsuits featuring both single and class-action plaintiffs. Please exercise some wisdom and planning for the greater good in your treatment of this very important East/West artery in our County. Sincerely, Mike Sisson 619-669-1809	AAAA 1 The commenter is referring to the JIV Gaming Development Project, not the SR-94 Improvement Project. The comment is noted and forwarded to the decision makers for their consideration. The traffic analysis presented in the Final EIR Section 2.4 shows an improvement of traffic operations corridor-wide. With regards to the JIV Gaming Development Project, please see RTC B1.

AAAA 1

COMMENTS	RESPONSES
BBBB 1	BBBB 1 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment:

I have lived in Jamul for 25 years. My family is very concerned about many issues resulting from the casino coming into our community. Traffic, safety, the environment, lights (dark sky). Are you listening to our concerns? Is it our $ you are spending, don't you work for the people?

(Optional information, please print.)

Name: Nancy Smith

Organization:

Address: Las Palmas Rd.

Phone: E-mail:

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
BBBB 2	BBBB 2 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment:

I am against this improvement, this is being shoved down our throats. You are not listening to our community. What is wrong with you! All about the $ right? No casino, no traffic, no bright lights, no crime, no deaths. That's what we want. Thanks for listening, but I doubt it.

(Optional information, please print.)

Name: Nancy Smith

Organization:

Address: Las Palmas Rd Jamul

Phone: E-mail:

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: Aug 5, 2015

Comment:

CCCC 1

1. I take objection to paragraph 2 of Item #1 first page of the FAQ handout "The land in to trust "Deed" leads for The Families - NOT A TRIBE"

Does Caltrans have proof that the JIV is a Federally recognized tribe for gaming (1934)?

If Caltrans has such proof please produce it immediately!

CCCC 2

Last sentence pge 1, Sect 1 paragraph 2 - "Why is there NO Mention of the 8 story 900 car parking facility when we are discussing the impacts to HWY 94

(Optional information, please print.)

Name: Marcia Spurgeon

Organization: Mother, grandmother homeowner

Address: P.O. Box 1133 Jamul

Phone: E-mail:

How did you hear about this meeting? This is farce

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

CCCC 1 Caltrans notes that JIV is federally recognized Tribe, as disclosed in the annual list of such tribes published by the United States Department of Interior in the Federal Register, see most recently 80 Fed. Reg. 1942-02 (January 14, 2015).

CCCC 2 Please see RTC J1.

COMMENTS		RESPONSES	
	August 27, 2015 Mr. David Nagy Environmental Branch Chief Caltrans, District 11 4050 Taylor Street, MS: 242 San Diego, CA, 92110 RE: Draft EIR for SR 94 Mitigation for the Proposed Jamul Indian Village Casino TO WHOM IT MAY CONCERN,		
CCCC 3	Please find attached my comments concerning the proposed mitigation for the casino project. In addition I want to add that we do not believe the casino is eligible for gaming. Not one public agency in the State of California has even bothered to verify the legal status of the local Village tribe.	CCCC 3	Please see RTC F6.
CCCC 4	It is wrong for a public agency such as Caltrans to violate your own mission statement, commitment to the local communities and allow this process to continue.	CCCC 4	Caltrans is processing an Encroachment Permit to construct the improvements listed in Chapter 1.0 of the SR-94 Improvement Project Final EIR.
CCCC 5	The proposals and the alternatives are bandages at the most. But you have totally created an even more dangerous road then what exists now by the mitigations that are being set forth in this Draft EIR.	CCCC 5	The objective of the Proposed Project is to improve traffic levels of service and safety. Please see RTC B1, B2 and C1.
CCCC 6	Over many years, I have attended meetings of Caltrans presentations going back to the late 1970's. Many of the mitigations that are proposed in this Draft EIR were on the drawing boards then. However, this Draft EIR fails entirely to address the additional impacts of 9000 daily car trips created by this commercial enterprise almost overnight. Personally, I believe adding employee car trips, service vehicles and other auxiliary traffic will jump the numbers up to 15,000+ making the impacts even more significant and in my opinion un-mitigable. I also believe the developers have put forth a low number to try and validate the minimal mitigation.	CCCC 6	Please see RTC B1, B2 and C1.
CCCC 7	Ironically, the cost figures presented to our community over the years have far exceeded the proposed cost that the developer and Village say they are willing to pay. So the commercial enterprise creating this additional burden is only going to be required by Caltrans to pay a minimal amount while, I assume using taxpayers money for the balance. I am troubled by the inequity of this deal.	CCCC 7	It is not clear what cost figures the commenter refers to and what actions those costs were intended to cover. JIV will fully fund the SR-94 Improvements.

COMMENTS		RESPONSES	
CCCC 8	Another concern is the District 11, Caltrans staff making a flip flop of what they have told our community for years would be required by any and all developers along SR 94. I personally know of multiple, and crippling requirements Caltrans has required of applicants to have ingress and egress on to SR 94. And in some cases, stopping a proposed project altogether. Now Caltrans has bent over backward to accommodate the developer and Village to build a casino. Doesn't making SR 94 more dangerous, put Caltrans and the State in the position to be sued by those who may be injured or killed due to the negligence of Caltrans for allowing this project to go forward? I would think so.	CCCC 8	Please see RTC B3.
CCCC 9	Lastly, SR 94 is a level F by your own standards. Two weeks ago we had a 10 hour road closure on SR 94, displacing thousands of travelers including residents, emergency vehicles, school buses, commercial vehicles etc. See the attached article.	CCCC 9	The purpose of the Proposed Project is to improve the efficiency and safety of SR-94.
CCCC 10	Since June, Caltrans has allowed the developer constructing the building for a casino, to park on private property across SR 94. The workers lineup before 6am on side streets, empty parking lots and along SR 94. Many of them get out of their vehicles visit and talk. literally blocking traffic with doors open. See attached picture from this morning. To get the workers to the construction site, Caltrans is now allowing workers to cross SR94, stopping traffic throughout the day, sometimes with a long line of cars and only one or two workers. This has created another hazard.	CCCC 10	The comment is related to the JIV Gaming Development Project, not the SR-94 Improvement Project Final EIR.
CCCC 11	Today, we had a fatal accident on SR 94. This accident closed the road for several hours. It was close to Steele Canyon High School, which was forced to seek an alternative route for children leaving school.	CCCC 11	The purpose of the Proposed Project is to improve the efficiency and safety of SR-94.

We know Highway 94 is unsafe. We are asking that you take the responsibility keeping our roads safe for all. I ask that you find for a no project and not allow this enormous burden to fall on the helpless travelers along Highway 94.

Sincerely,

Marcia Spurgeon Mike R Spurgeon

Marcia Spurgeon & Michael R. Spurgeon

2

COMMENTS

Jean Strouf
16089 Lyons Valley Road
Jamul, CA 91935

August 4, 2015

Caltrans EIR
Community Meeting at Cottonwood Golf 8/5/2015

To Whom It May Concern:

I have read almost all of your 654 page document sent to me a couple weeks ago. My comments below:

DDDD 1

1. The results of statistical analysis are based on who pays for the statistics. This is fact.

DDDD 2

2. Most of us in the Jamul Dulzura area are very aware that the Executive Branch and the Administrative Branch of the State of California have put an exorbitant amount of pressure on Caltrans and all other state agencies involved to get the JIV project through, regardless of impacts. It's simple: Follow the Money.

DDDD 3

3. The Executive Branch's desired result is to increase urbanization dramatically in Jamul (see page 2.3-18 of report).

DDDD 4

4. The increased traffic, no matter how mitigated, will increase injury accidents and fatalities from Otay Ranch Road in Chula Vista to SR 94, and from that intersection to Rancho San Diego at Jamacha.

DDDD 5

5. The cost of goods coming from and going to Tecate, Mexico will increase by 10%-20% because of reduced speed for commercial vehicles.

DDDD 6

6. Death toll on nocturnal animals (such as coyotes, owls, deer) traveling between RJER and Hollenbeck Canyon Reserve will significantly increase.

DDDD 7

Your report is stated logically, and you've attempted to be quite complete with the studies.

DDDD 8

Please be mindful of the following, and this is by no means a threat, but purely a statement of fact: should the proposed casino open and operate, there will be significant publications to insure that every single employee and patron, and their families will be advised to sue Caltrans for a minimum of $5 million for any significant injury or death as a result of vehicle accident. The suit will be for misconstruing collected data to slant outcomes that uphold desired results for this EIR.

Thank you.

RESPONSES

DDDD 1 The results of the analysis provided within the Final EIR are based on careful, objective analysis by Caltrans and its consultants.

DDDD 2 The comment is noted and forwarded to the decision makers for their consideration prior to project decision.

DDDD 3 The analysis presented on page 2.318 of the Final EIR is an assessment of the project benefits related to community character and cohesion.

DDDD 4 The objective of the Proposed Project is to improve traffic levels of service and safety. Please see RTC B1, B2 and C1.

DDDD 5 The traffic analysis presented in Chapter 2.4 of the Final EIR shows that the Proposed Project would improve traffic through the project site as a whole.

DDDD 6 Roadkill typically increases with increases in traffic volumes. However, the Proposed Project will not increase traffic volumes. Therefore, the Final EIR concluded that implementation of the Proposed Project will not significantly increase roadkill.

DDDD 7 The comment is noted and forwarded to the decision makers for consideration prior to project decision.

DDDD 8 The commenter doesn't explain how Caltrans misconstrued collected data and slanted outcomes. No further response is required.

COMMENTS	RESPONSES
From: Patrick Sullivan **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** SR 94 Mitigation Efforts **Date:** Thursday, August 27, 2015 9:19:25 PM EEEE 1 I, Patrick Sullivan, at 1857 Honey Springs Road, Jamul, CA 91935, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. EEEE 2 In a community as rural as Jamul is, CalTrans has not addressed the most basic of needs and has not involved the community in this effort. I live on Honey Springs Road and use SR 94 twice daily and with the Steele Canyon High School traffic and the current construction traffic (which is much less than that which a casino would generate) already exceeds any reasonable safety standards. With the SDG&E new power project and other changes along SR 94 we are currently making a bad situation much worse. I have already spent too many hours waiting in lines after an accident or as traffic enters and exits the casino construction site. Someone is not doing their job which should be to provide the local community with a voice in this project. They are also not providing us with a safe access to our homes in the Jamul Dulzura area. When I travel Honey Springs Road, SR 94 and Otay Lakes Road, I am always thinking about the additional traffic that has not been adequately taken into consideration by your offices. Please do your job and put together an EIR that realistically addresses the concerns of the community and which doesn't simply turn over control of our East County highway system to those who have decided to construct facilities without proper planning on mitigation assessment. Sincerely, -Patrick Sullivan Librarian Emeritus, San Diego State University Homeowner in Jamul, CA	EEEE 1 Please see RTC K5. EEEE 2 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
From: Jill Tatman **To:** SR94_SR_94_Draft_EIR@DOT **Subject:** Tragic Mess **Date:** Wednesday, August 26, 2015 1:16:37 PM FFFF 1 I, Jill Tatman_____ want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. You people get real, this is a disaster and you know it... GREED INC. ----------Jill Tatman---------- Sent from Jill's mini iPad 619 733-4833	FFFF 1 Please see RTC DD1

COMMENTS

RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/18/15

Comment:

GGGG 1 Caltrans has failed to safeguard our community by allowing the work that has taken place by the JIV. The community has been left out in this process and there has not been sufficient time for the public to review all the information and to provide comments.

GGGG 2 In the past Caltrans has assured our community that they would apply the same rules to any and all developers along the 94 corridor. This has not been the case with the JIV. Caltrans did require our Fire District to align their entrance to 94 with Melody Road at a cost of $800,000. However this same rule has not been applied to the JIV. Caltrans has stated that there could be no direct access to 94 and yet, the JIV has used two crossings directly onto 94. This has significantly impacted the State Highway System! The public safety has been put in jeopardy by allowing all the construction traffic to access the site on 94 without any prior mitigation.

GGGG 3

GGGG 4 Caltrans did not require an encroachment permit with the JIV project. This would have been required with any other development. In the EIR there is no mention of all the streets that have access to 94 nor does it mention of all the private driveways which access 94. More importantly Honey Springs Road and Otay Lakes Road have no mention in the EIR. This has been brought to Caltrans attention several times. More than half the traffic to the project will be accessed using Otay Lakes Road and from further east on 94 from the communities of Dulzura, Tecate and Potrero!

GGGG 5

GGGG 6 Several roads off of 94: i.e.; Las Palmas, Hillside Drive, Indian Springs, Vista Diego, Pine Lane, Fair Oaks, Marlena Way, Stoney Oak Drive Old Campo Road Millar Ranch Road, plus several private driveways will be impacted and are not addressed or mitigated in the EIR.

GGGG 7 There have been several occasions where many residents and travelers on 94 have had to use Jamul Drive when the traffic has been stopped for accidents and other closures yet the EIR does not mention how any evacuation would be done in the event of an accident or natural disaster such as a fire. This would also apply to Steele Canyon Rd and the streets and driveways that access Steele Canyon.

(Optional information, please print.)

Name: Pat Terry

Organization:

Address: 1833 Honey Springs Rd

Phone: 619-464-8989 E-mail: Terryprch@yahoo.com

How did you hear about this meeting? received Draft EIR in the mail

Written comments may be submitted by e-mail to:
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA 92110

GGGG 1 Caltrans does not have approval authority over the JIV Gaming Development Project. Please see RTC B1 and BB4.

GGGG 2 Please see RTC B3.

GGGG 3 The comment is referring to the JIV Gaming Development Project and not the SR-94 Improvement Project or its Final EIR, which is the subject of this process. With that said, the JIV Tribe did apply for, and received, a Caltrans encroachment permit for the temporary construction activities associated with the JIV Gaming Development Project.

GGGG 4 Caltrans did require and JIV was issued an encroachment permit for use of SR-94 right-of-way during construction of the JIV gaming facility for placement of flaggers and signage to enhance and ensure safety while trucks entered and exited the JIV gaming facility construction site. The Proposed Project will require an encroachment permit from Caltrans to install the portions of the SR-94 Improvements that would be located within Caltrans right-of-way.

GGGG 5 The Proposed Project consists of specific roadway improvements designed to address traffic increases resulting from the JIV Gaming Development Project. Please see III1. These traffic improvements do not generate traffic and would not adversely affect Otay Lakes Road or side streets and driveways along SR-94. Section 2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final EIR demonstrates that the operations at the intersection of SR-94/Otay Lakes Road would not change with the implementation of the Proposed Project. To the extent that the commenter's concerns deal with the JIV Gaming Development Project, please see RTC B1, B2 and C1.

GGGG 6 Please see RTC GGGG5.

GGGG 7 The objective of the Proposed Project is to improve traffic levels of service and safety. Please see RTC B1, B2 and C1.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date:

Comment:

GGGG 8 There is no mention of how emergency services times will be increased due to the new proposed traffic lights that will make the trips longer up and down 94 from Jamacha Road passed the JIV project.

GGGG 9 Commuter traffic drive times will be significantly longer due to more traffic lights and more traffic generated by the JIV project. There is no mitigation for these impacts.

GGGG 10 On Friday August 14, 2015 around 10:30 am there was a major accident on Highway 94 near Marron Valley Road, involving a semi-truck trailer that had overturned taking a curve too fast and smashing another vehicle. There were fatalities! Highway 94 was closed to traffic heading east on 94 and traffic was lined up on Otay Lakes road for over **9 hours** many motorists stranded in 100 degree heat. No traffic signs warning of any delay were posted on Highway 94 and Jamacha and no signs were posted warning motorist that Otay Lakes Road was closed due to this accident. This is not a rare occurrence on this section of Highway 94, yet the **EIR completely ignores anything east of the project**.

GGGG 11 This is a deliberate error since all of the traffic coming from the project site during the initial stages of excavation turned right from the project and headed down Otay Lakes Road! Many motorists will be coming to the project via Otay Lakes Road and from further east on 94 and yet the EIR makes no mention of how traffic will be affected or possibly mitigated.

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

GGGG 8 The improvements included in the Final EIR would provide standard 8-foot shoulders within the footprint of the improvements, as well as additional lanes that would provide more space for vehicles to move to the side, allowing emergency vehicles to travel along SR-94. In addition, emergency vehicle preemption equipment would be installed at all signalized intersections within the project footprint. The improvements would enhance the capacity of emergency vehicles to navigate along SR-94.

GGGG 9 Please see RTC GGGG8.

GGGG 10 The objective of the Proposed Project is to improve traffic levels of service and safety. Please see RTC B1, B2 and C1. The Proposed Project consists of roadway and intersection improvements, and the effects of such improvements were evaluated at the geographic locations where it was determined by traffic experts that the improvements might cause adverse effects on traffic levels of service. The objective of the Proposed Project is to implement traffic mitigation measures identified in the FTEE for the JIV Gaming Development Project. Such mitigation measures did not include improvements along SR-94 east of the proposed JIV gaming facility. Please see RTC GGGG8 regarding emergency responses.

GGGG 11 The JIV gaming facility is not the project analyzed in this EIR (please see RTC B1, B2 and C1). The Proposed Project consists of traffic improvement measures that were identified in the FTEE for the JIV Gaming Development Project.

COMMENTS	RESPONSES
From: Ronald Torretto **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Malfeasance and Highway 94 **Date:** Thursday, August 27, 2015 6:43:04 PM HHHH 1 Who is responsible for the abject lack of transparency with respect to safety problem and accidents on highway 94? Continued lack of public comment on, and advocacy for, the dangerous on going conditions of this roadway can only be considered deliberate and contrived. How can you justify this? Who potentially profits from this willful lack of action to improve this roadway? Who will be held accountable for the inevitable carnage that will be fostered by the increased traffic generated by the soon to be completed Casino? R. L. Torretto Jamul California	HHHH 1 The Final EIR Section 2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities contains a complete, transparent traffic analysis for the SR-94 Improvement Project. An objective of the proposed SR-94 Improvement Project includes lessening direct traffic impacts caused by the JIV Gaming Development Project on SR-94 (see Final EIR, page 1-5). Additionally, the traffic analysis referenced above concludes that the traffic operations would be improved corridor-wide. Scoping comments and comments on the Final EIR contain many of these comments/ observations. This SR-94 Improvement Project is an effort to improve traffic safety conditions on SR-94.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 5 August 2015

IIII 1 Comment: 1. Mitigation proposed are completely Inadequate
2. $16.5 million is completely inadequate even for mitigation proposed (Amount SID will contribute).

IIII 2 3. No mitigation east of the proposed casino has been considered

IIII 3 4. SID proposed casino will be closest casino to Chula Vista. Most direct route to casino from Chula Vista is Otay Lakes Rd. No mitigation of Traffic impact on Otay Lake Rd proposed.

IIII 4 5. Pio Pico Camp ground is on Otay Lakes Rd. Ped crossing on Otay Lakes Rd is dangerous at Present. Will become a death trap with increased traffic with impaired drivers

IIII 5 6. Intersection at Otay Lakes and 94 is dangerous at present will become nightmarish with increased traffic Flow.

IIII 6 7. Any use of Buses on Hwy 94 EAST of the casino pose major traffic hazards.

IIII 7 8. This is the wrong project in the wrong place simply due to traffic hazards.

(Optional information, please print.)

Name Greg Tyree

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

IIII 1	Please see RTC UUU6.
IIII 2	Please see RTC J1.
IIII 3	Please see RTC J1.
IIII 4	Please see RTC J1.
IIII 5	Please see RTC J1.
IIII 6	Please see RTC J1.
IIII 7	Please see RTC J1.

COMMENTS

From: KD Tyree
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Comments on the Draft EIR
Date: Thursday, August 27, 2015 4:11:58 PM
Attachments: image.png

JJJJ 1

Caltran's analysis of MAJOR impacts and how they affect Hwy 94 is wholly inadequate in this draft EIR. Caltrans appears to be unaware of the traffic snarl when an accident occurs on Hwy 94! We sat in a traffic jam for hours this afternoon. Notably, Caltrans did not even report this COMPLETE SHUTDOWN of Hwy 94 IN BOTH DIRECTIONS (see below):

Caltrans, as reflected in this draft EIR, does not understand the magnitude of potential impacts to Hwy 94. Caltrans has not even analyzed areas that might have to provide an alternate route in case of ACCIDENT or FIRE such as: Steele Canyon, Jamul Drive, Lyons Valley, Skyline Truck Trail and the most problematic intersection of all: Honey Springs at Otay Lakes Road!

I am requesting the above (including the graphic) be noted as part of the Public Comments for this Draft EIR.

Kathleen D. Tyree
1842 Honey Springs Road
Jamul, CA 91935

RESPONSES

JJJJ 1 The analysis included in the Final EIR was prepared following the Caltrans' Guide for the Preparation of Traffic Impact Studies, dated December 2002. Per the guidelines outlined in this document, all intersections and roadway segments where the project would make modifications were analyzed in detail using the methodology and criteria stated in Caltrans' guidelines. In addition, those intersections and roadway segments outside of Caltrans' jurisdiction which are within the County of San Diego's jurisdiction were analyzed with the same level of detail as outlined in the County of San Diego's Report Format & Content Requirements – Transportation and Traffic, dated August 24, 2011.

In the unfortunate event of a road closure along SR-94, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions as to how to safely manage the street network. These events occur randomly and under different circumstances. Each situation is handled differently using the judgment of trained traffic control officers. When an emergency occurs, vehicular traffic is required to move to the shoulder and allow emergency vehicles to pass.

The improvements included in the Final EIR would provide standard 8-foot shoulders within the footprint of the improvements and additional lanes that would provide more space for vehicles to move to the side, allowing emergency vehicles to travel along SR-94. In addition, emergency vehicle preemption equipment would be installed at all signalized intersections within the project footprint.

COMMENTS

From: KD Tyree
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Comments for Proposed SR 94 Improvement Project
Date: Wednesday, August 26, 2015 11:05:42 AM

JJJJ 2 I, Kathleen D. Tyree want to go on record stating that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed.

JJJJ 3 The Caltrans material review period for this Draft EIR is insufficient for public to review and provide comments (you are keenly aware that July-August is vacation time for many who will not even see the EIR until too late)!

JJJJ 4 Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. THIS project segmentation under CEQA and NEPA and is NOT ALLOWABLE BY LAW.

JJJJ 5 Notably Caltrans has NOT MITIGATED impacts to:

-All the feeder streets along SR 94
-All the private driveways along SR 94
-Otay Lakes Road access to SR 94
-Honey Springs Road access to SR 94
-Jamul Drive (when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94)
-Steele Canyon Road and all streets and driveways (when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94)
-Emergency services times by the increased traffic impacts
-Drive time for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.

JJJJ 6

JJJJ 7 BUT CALTRANS is willing to:

-Improperly place traffic lights with a shorter distance than Caltrans Regulations state WITHOUT JUSTIFICATION
JJJJ 8 -Disregard the safety of our children and parents driving to school
JJJJ 9 - Compromise public safety by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)
JJJJ 10 -Repeatedly fail to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.
JJJJ 11 -Negate the public's best interests by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations Caltrans has REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.
JJJJ 12 -Allow SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. This is fraud, waste & abuse at its worst.
-Allow an exemption to SDG&E to run new power specifically to operate a commercial

RESPONSES

JJJJ 2 Please see RTC K5.

JJJJ 3 The 45-day public review period provided is as required by State Law. The public review period does not take into consideration vacation schedules of the reviewing public.

JJJJ 4 Please see RTC B1.

JJJJ 5 Please see RTC J1.

JJJJ 6 Please see RTC I10.

JJJJ 7 The traffic signal spacing proposed for the new traffic signals along SR-94 meet the requirements for a conventional highway facility as defined in the Caltrans Highway Design Manual.

JJJJ 8 Please see RTC GGGG3.

JJJJ 9 Please see Final EIR Chapter 6 *Comments and Coordination* for the public review process completed for the SR-94 Improvement Project. Also, please see these responses to comments on the Draft EIR.

JJJJ 10 Please see RTC GGGG3.

JJJJ 11 Please see RTC K3.

JJJJ 12 Please see RTC K3.

COMMENTS

enterprise along SR 94 WITHOUT CEQA OR PROPER MITIGATION.

JJJJ 13

This Caltrans EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. Caltrans has failed the State of California taxpayers.Caltrans has failed.

I desire my comments be noted and recorded above.

Kathleen D. Tyree
1842 Honey Springs Rd
Jamul, CA 91935
(571) 294-7915

RESPONSES

JJJJ 13 For the project being evaluated, the SR-94 Improvement Project, Caltrans is complying with CEQA. An analysis of the community and public safety and welfare issues is contained throughout Chapter 2.0 Environmental Setting, Impacts and Mitigation Measures of the SR-94 Improvement Project Final EIR. In particular Traffic and Transportation/Pedestrian and Bicycle Facilities are analyzed in Section 2.4, while Community Character and Cohesion is analyzed in Section 2.3 of the Final EIR. Also, please see RTC B1.

COMMENTS	RESPONSES
KKKK 1	KKKK 1 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: Aug. 6, 2015

Comment: Please do Not allow the Caminos to have access to our already dangerous Roads. We love our community and don't want to bury any of our friends because of an accident on the road.

Alcohol plus "7" rated highway = death

(Optional information, please print.)

Name S. W.

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS

From: Wallace, Robyn
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Accident on 94, 27 AUG 2015 -- "SR94 Improvement Project"
Date: Thursday, August 27, 2015 3:45:41 PM

Dear Cal-Trans –

Re: "SR94 Improvement Project"

LLLL 1 A serious accident was reported today on S94 and Malena Rd. Review of your site does not show this event. Traffic was closed off on S94 EB and WB for hours. Those of us who live in the area are concerned about your commitment to driver safety in this area.

LLLL 2 The "SR94 Improvement Project" has no improvement listed east of the proposed casino site, and no indication of improvements that may be needed on alternate routes due to diversion of traffic due to the proposed casino traffic (e.g. Steele Canyon, Jamul Drive, Lyons Valley, Honey Springs, Skyline TT, Otay Lakes Rd).

LLLL 3 Please take this accident into consideration for your review of the proposed casino impact and improvements to the area.

Kind regards,

Robyn H. Wallace

RESPONSES

LLLL 1 The commenter seems to be referring to the Caltrans District 11 website, not the SR-94 Improvement Project or the Draft EIR. No further response is required.

LLLL 2 Please see RTC GGGG5.

LLLL 3 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
From: Valerie Wayson **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** highway 94 mitigation JAMUL **Date:** Wednesday, August 26, 2015 11:05:08 AM MMMM 1 PLEASE FOLLOW THE RULES AND MITIGATE THE IMPACTS OF INCREASED TRAFFIC>	MMMM 1 Please see RTC K5.

COMMENTS	RESPONSES
From: Dan Wemple **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Casino in Jamul Traffic **Date:** Friday, August 28, 2015 7:56:25 AM I know this will fall on deaf ears, but here you go. NNNN 1 Around 6:00 AM vehicles start arriving on east bound 94 and park before the casino. These vehicles that are parking on the side of the road are the workers for casino. At just before 7:00 AM they (the casino workers) pull out onto the east bound lane of 94 that goes towards the casino. This mass entrance onto 94 east and the morning traffic heading west from Otay Lakes Road and points east causes a massive traffic jam on the east bound 94. These workers vehicles are trying to turn onto the road that may be an extension of Melody Lane or it may have another name that I am not aware of. This extension of Melody Lane, as I call it, leads around the fire station to the new parking area for the construction workers. When I was driving west on highway 94 the line of cars stretched about a mile west, or just past Jamul Hardware. The point is this is supposedly a California highway that allows California Citizens to travel for pleasure or business unimpeded, but it has become the casino road to use however they see fit. First there is the congestion caused by the casino workers going into the parking area congestion. Then there is the of workers walking across the road when the crossing STOP signs are lowered. This pretty much repeats in the afternoon, with the exception of the parking on the side of the road. Daniel C. Wemple 1843 Honey Springs Road Jamul, Ca 91930	NNNN 1 Please see RTC B1, B2 and C1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/2015

Comment:

OOOO 1 MONEY TALKS, AND THE FINANTIAL BACKERS OF THE CASINO HAVE PLENTY OF IT (TO SPREAD AROUND). OUR CHURCH (SKYLINE) WENT THROUGH YEARS AND YEARS TO GET APPROVAL TO BUILD. WE WENT THROUGH HOOP AFTER HOOP BUT THE CASINO JUST CUTS THROUGH ALL THE RED TAPE SO EASILY. MAKES CITIZENS WONDER WHATS GOING ON BEHIND THE SCENES.

OOOO 2 PLEASE MAKE THE CASINO BANKERS ADHERE TO THE SPIRIT AND LETTER OF THE LAW.

OOOO 3 I OPPOSE THE CASINO FOR ALL THE EXTRA TRAFFIC, SAFETY CONCERNS, NOISE & LIGHT POLLUTION AND CRIME THAT WILL COME INTO THIS QUIET AREA.

OOOO 4 PLEASE DO THE RIGHT THING FOR THE CITIZEN AND NOT JUST THE WEALTHY BACKERS OF THE CASINO.

(Optional information, please print.)

Name: STEVE WILKUTS

Organization:

Address: 14827 PRESILLA DR, JAMUL, CA 91935

Phone: 619 660 1422 E-mail: SBWILKUTS@YAHOO.COM

How did you hear about this meeting? JAMULIANS AGAINST THE CASINO

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

OOOO 1 The JIV is seeking an encroachment permit to allow for the identified roadway improvements. Prior to receiving Caltrans decision on the requested permit, CEQA compliance is required. The JIV has paid for the CEQA process to be completed. Thank you for your comment.

OOOO 2 The JIV are complying with CEQA law by going through this Final EIR process.

OOOO 3 Please see RTC J1.

OOOO 4 Caltrans is processing the proposed intersection and access road improvements for SR-94. Please see RTC B2.

COMMENTS	RESPONSES
From: STEVE WILLCUTS **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** PROPOSED CONSTRUCTION ON SR-94 **Date:** Wednesday, August 26, 2015 10:21:25 PM PPPP 1 [I want to go on record in opposition of the construction that is proposed for SR-94 to benefit a big spending private enterprise. It sure seems as if bureaucrats have been bought off. The EIR is deeply flawed as it does not properly address the safety issues. How can construction be started when the public have not had the time or been given attention by Caltrans. Our church (Skyline) went through scores of regulations, about ten years and many thousands of dollars to get Caltrans approval. But Penn National gets fast tracked. What's going on? Steve and Bernice Willcuts 14827 Presilla Dr. Jamul, Ca 91935	PPPP 1 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: August 6, 2015

Comment: The Jamul Indian Casino is and has never been in the best interest of this community! I have many concerns with this project being built in our community.

QQQQ 1 First and most importantly is the traffic that it will bring to our already crowded highway, that is already a main road in and out of Mexico. The two lane winding road is already over crowded and the accidents that happen are deadly. You want to add more traffic to our roadways that already are dangerous, that travel pass a High School and elementary school? You're going to have people driving above the speed limits trying to reach their destinations with NO knowledge of the road ways! People that have stayed up late gambling and now need to rush in school traffic to get to work or home!

QQQQ 2 Secondly the building is ugly and a sore sight to come around the dangerous curve and see! It couldn't be in a more dangerous place on the road, let alone one of the most beautiful valleys to drive through and now you have this large building that doesn't even fit the area!!

QQQQ 3 This is NOT Indian Land and the Daley family did not give them this land so they could build a casino on it !!

QQQQ 4 I am a third generation San Diegan and have always loved our city and the surrounding areas. My husband and I moved our family out to this rural area 27 years ago to raise our children. Now you want to tear up our road again and bring loads of people into this small community to gamble? I believe that we are already over loaded with casino's! I see the traffic and buses that Cottonwood has and the traffic and accidents that happen around all of the casino's! People gamble and drink, they go together!! I do not see how this fits into our small rural community!!

QQQQ 5 I am also concerned with the time it will take a fire truck or ambulance to now get to my home! With the extra traffic and accidents, the people that live in the community will now not have the quality service that we so deserve.

This Casino is all about money for Cal Trans & SDG&E, and people that really have no care about our comunity!! The people that live here are going to be the ones that it hurts financially and our life style's will be deeply affected by this. The Casino is not going to enhance our town, it is going to bring it down and make it dangerous and trashy!!

(Optional)

Name: Carrie L Witte

Organization: Jamul Property Owner

Address: 14853 Lyons Vly Rd

Phone: E-mail: carelou@cox.net

How did you hear about this meeting? Community

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

QQQQ 1	Please see RTC J1.
QQQQ 2	The JIV Gaming Development Project is not part of the SR-94 Improvement Project.
QQQQ 3	Please see RTC QQQQ2.
QQQQ 4	Please see RTC J1.
QQQQ 5	Please see RTC G4.

COMMENTS	RESPONSES
Dana Yenawine 2776 Vista del Piedra Jamul, CA 91935 619-669-0718 dybiking@cox.net David Nagy Environmental Branch Chief Caltrans, District 11 4050 Taylor St. MS: 242 San Diego, CA 92110 Right off, let's call this what it really is. Yes, SR-94 has issues. But to think that nickel and dime efforts (even **$16M** worth) are going to come close to solving the problems that the new casino project will dump on the residents of Jamul and areas east and west of there is foolish Let's call it the Jamul Indian Village Casino Improvement Project, as that is what this project has been from the start.	
RRRR 1 Seems odd that Peaceful Valley with a maximum of 100 cars per day was required to route access to Melody Rd. while the JIV with estimates of 10,000 cars per day gets direct access to Hwy 94. If I were to open a business with 100 cars per day I would be denied direct access to Hwy 94, yet for some unknown reason the JIV gets unfettered access for 100 times as many cars. Could this have something to do with the **$$$** being thrown around by their backers (**$16M** and counting??) Seems the JIV should be required to play by the same rules as others and require all access via Melody Rd. They control the 87 acres between Melody Rd. and the project site so it shouldn't be a problem. It would be nice to see CALTRANS level the playing field and make everyone play by the same rules. Of course, the '***Pay to Play***' rules seem to be in effect, and **$16M** seems to buy a lot of play.	RRRR 1 Please see RTC B3.
RRRR 2 #10 in your 'Frequently Asked Questions' states that the Jamul Tribe already had access to SR-94 and didn't have to ask CALTRANS for permission to use it. Seems like in the past the tribe had access for residents to come to and from their homes, nothing more. Since there haven't been any houses there in nearly 10 years, they probably shouldn't have any access. Did that change, without public input, and with benefit of outside money? Again, curious that they get all the access they want, no one else gets any direct access. Maybe that access is safer when it consists of thousands of double tractor-trailers, concrete trucks, etc., and in the future 10000 cars per day coming and going. Must be some sort of CALTRANS-Specific logic in play here. ***Pay to Play*** we call it.	RRRR 2 Please see RTC B3.

COMMENTS

RRRR 3

Why did CALTRANS allow construction to begin before all mitigation measures were in place? Why the rush for TMP when no mitigation had been implemented? **$16M** reasons. CALTRANS brought this mess on itself, (actually the people of Jamul), by allowing access to the site and construction to begin before mitigation. Now it appears the casino will open before the mitigation is complete and the citizens of Jamul will suffer. Who at CALTRANS is responsible? Will anyone be **FIRED?? I think not!**

RRRR 4

Who at CALTRANS made the determination that these are JIV Tribal Lands eligible for a casino project? Seems it still needs to be settled in court. If JIV loses, will anyone at CALTRANS be held responsible? Of course not!!

RRRR 5

How much road does **$16M** buy?

RRRR 6

Since CALTRANS allowed construction to proceed without CEQA review, it effectively took the **'No Project Alternative'** off the table, which wouldn't have required mitigation. Now it says the only alternatives are how much mitigation will **$16M** buy? It doesn't appear to be very much.

RRRR 7

EIR speaks of applying for approvals from, among others, County Government. Since the County is party to a lawsuit against CALTRANS, is it safe to assume they didn't give approval, and that didn't matter as much as **$16M?**

RRRR 8

Why are all the traffic studies (counts) done at times when Steele Canyon High School is out of session? Are those traffic impacts not worthy of inclusion in this project's projected impact? Or just another convenient oversight on the part of the project proponents.

RRRR 9

How much is JIV fair share?

RRRR 10

JIV doesn't think there will be major traffic increases from South Bay area along Otay Lakes Road and Hwy 94 east of the project? That is a convenient and cost-saving oversight, though probably incorrect at best, and more likely a **total fabrication**. Otay Lakes-Honey Springs Road intersection is dangerous now, how will it be with 3-fold increase in traffic? Also Rancho Jamul Dr., Las Palmas, Hillside, Vista Diego, Indian Springs, Vista Sage, Via Las Faldas, Rancho Miguel, private streets and driveways.and other side roads that lead to numerous residences?

RRRR 11

What is going to happen to the shoulders along Hwy 94 and access for bicycles? Hwy 94 is Adventure Cycling's route for cyclists heading east from San Diego to points east, including those riding across the country, Are cyclists going to get squeezed into ever smaller shoulders with ever more traffic whizzing by at 5-6 times their speed? Sounds like slaughter alley to me.

RESPONSES

RRRR 3 Please see RTC B1.

RRRR 4 Please see RTC B1.

RRRR 5 The comparison of estimated construction and support costs is provided in Table 1-10 of the Final EIR.

RRRR 6 Please see RTC B1.

RRRR 7 Please see RTC B1.

RRRR 8 As shown in Figure 3-2 of the Traffic Impact Study, the intersection of SR-94 and Cougar Canyon Road was evaluated with counts conducted during School operations. The exhibit shows that at the time of the counts, a total of 579 vehicles entered Steele Canyon High School during the morning peak-hour period, and 472 vehicles exited the site at the same time. This represents typical high school operations at the intersection. The traffic impact study evaluates both the commuter peak-hour traffic periods (AM and PM) along SR-94 to evaluate worse case conditions.

The analysis of the operations at the intersection of SR-94 and Cougar Canyon Road was included in the Traffic Impact Study report completed for the Final EIR.

RRRR 9 JIV will fully fund the SR-94 Improvement Project.

RRRR 10 The Proposed Project, which consists of road and intersection improvements, will not adversely impact the driveways, roads or intersections listed in the comment.

COMMENTS

RRRR 12

What mitigation measures will be implemented to allow long and sometimes slow-accelerating vehicles (toy haulers, horse trailers, etc.) to enter and exit the roadway from side streets and private driveways, when, after the Project is in operation, there will be approximately 10 **MORE** cars per minute on Hwy 94 than at present? It is challenging now to get on and off the road with a trailer. Maybe the JIV will provide us with flaggers and the CHP will escort us on and off the highway, like they do now for the casino construction workers crossing the road. I'm not counting on that!

Hopefully this project will be shot down in the courts, resulting in heads rolling at Caltrans, starting with Malcolm Dimwiddie (or whatever) and continuing right down the food chain to all those who facilitated this fiasco. It is inconceivable to me that we will be paying you and your survivors for life for facilitating this travesty on the citizens of Jamul and all the people of California.

Sleep Well,

Dana R. Yenawine

Dana Yenawine

RESPONSES

RRRR 11 The Proposed Project consists of highway and intersection improvements and will not increase traffic. Please see RTC B1, B2 and C1. The use of the existing shoulders along SR-94 is consistent with the County of San Diego's Bicycle Transportation Plan which classifies SR-94 as a Priority 1 Bikeway as either a shared facility (Class III) or Share-the-Road signage corridor.

The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. For all the improvements, a minimum 8-foot shoulder would be provided, where bicycles would be able to travel as they do under existing conditions.

RRRR 12 The Proposed Project, whose objective is to improve traffic levels of service and safety, consists of highway and intersection improvements and will not increase traffic. Since these traffic improvements do not generate traffic they would not adversely affect the operations of the side streets and driveways along SR-94. Please see RTC B1, B2 and C1.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment:

SSSS 1 THE PROPOSED ROAD IMPROVEMENTS ARE INADEQUATE FOR THE POTENTIAL TRAFFIC VOLUME. I BASE THIS OPINION FROM MY SERVICE OF OVER 21 YEARS AS A LAW ENFORCEMENT OFFICER IN SAN DIEGO COUNTY. OVER THOSE YEARS I HAVE WORKED INCIDENTS IN & NEAR VIEJAS, GOLDEN ACORN, LA POSTA & SYCUAN CASINOS.

SSSS 2 NOT ADDRESSED IN THE PROPOSAL ARE: OTAY LAKES RD & 94, PACIFIC VALLEY RD OR THE RESIDENTIAL ROADS NEAR ONE OF THE PROPOSED ENTRANCES.

SSSS 3 I AM ALSO CONCERNED ABOUT DELAYED EMERGENCY RESPONSE TIMES ESPECIALLY IF THERE IS A NEED FOR THE CASINO TO EVACUATE.

SSSS 4 MUCH MORE CONSIDERATION TO TRAFFIC VOLUME & EMERGENCY RESPONSE MUST BE MADE BY CALTRANS. TRAFFIC LIGHTS & TURN LANES ARE A BANDAID COMPARED TO WHAT MUST BE DONE TO FACILITATE SUCH A TRAFFIC VOLUME INCREASE FROM SUCH A LARGE COMMERCIAL PROJECT

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

SSSS 1 Section 2.4 "Traffic and Transportation/Pedestrian and Bicycle Facilities" concludes that the intersections and roadway segment improvement evaluated would improve the operations of those intersections and roadway segments compared to the baseline or No Build conditions.

SSSS 2 The Tribal Environmental Evaluation prepared by the JIV gaming facility identified the need for permanent improvements to the State Highway System (see Final EIR Section 1.1 Project Background). Please see RTC III1.

SSSS 3 Please see RTC G4.

SSSS 4 Please see RTC J1.

COMMENTS

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8.5.15

SSSS 5 — Comment: providing passing lanes for better traffic flow.

SSSS 6 — By 7/11 no sholder going west - very dangerous.

SSSS 7 — take in account how people drive. This will cause back up traffic.

Research back caltrans project for steel canyon. It's a mess, major traffic build up. Casino will add to more traffic build up.

SSSS 8 — Lyon's Valley Rd. has blind spot before intersection. This will cause accidents when light goes in.

Safety

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

RESPONSES

SSSS 5 — The Final EIR includes the evaluation of the implementation of additional travel lanes at the intersection of Steele Canyon Road and SR-94 (Near the existing 7/11 store). The improvements at the Steele Canyon Road and SR-94 intersection were designed to increase queuing capacity at the intersection and decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, acceleration and deceleration lengths were designed per the Caltrans Highway Design Manual and the California Manual on Traffic Control Devices.

Having a second lane in the eastbound and westbound directions would facilitate and enhance access for the businesses along the south side and north side of SR-94, as the second lane would provide an opportunity for a slower lane of traffic for vehicles making a right-turn movement. The existing two-way left-turn lane along SR-94 would be maintained to facilitate the movement in and out of the existing driveways.

SSSS 6 — Please see RTC SSSS5.

SSSS 7 — Please see RTC SSSS5.

SSSS 8 — The installation of the traffic signal at Lyons Valley Road and SR-94 would require that the minimum stopping sight distance be provided for vehicles traveling along SR-94 at the design speed of 55 MPH. The stopping sight distance would be determined based on the maximum anticipated queuing at the intersection from a delay and queuing evaluation with the existing and expected future volumes.

In addition, “Signal Ahead” warning signs with a flashing yellow light would be added approaching the intersection from both sides of SR-94.

COMMENTS	RESPONSES
SSSS 9	SSSS 9 Improvements at the intersection of Vista Sage and SR-94 were not included within the project description or evaluated under this Final EIR. The intersections and roadway segment improvements included in this Final EIR were derived from the analysis included in the Final Tribal Environmental Evaluation prepared for the JIV gaming facility (Final Tribal EE, 2013), as mitigation measures for the JIV Gaming project's direct traffic related impacts. Please see RTC III1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/2015

Comment: RE: Vista Sage Lane

There is NO TURN LANE. THERE HAVE BEEN MANY ACCIDENTS. PLEASE PROVIDE SOME SAFETY FOR OUR RESIDENTS ON OUR ROAD.

Thank You

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
SSSS 10	SSSS 10 Please see RTC L1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/15/15

Comment: What About Safety!!

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date:

Comment: I WELCOME THIS PROJECT. IT BRINGS REVENUE TO THIS COMMUNITY. BRINGS JOBS TO THE COMMUNITY.

SSSS 11

THE ONLY FALL BACK IS THE TRAFFIC THIS NEW CASINO WILL BRING. THE ROADS ARE TO NARROW EVEN IF CALTRANS DOES MAKE IT A TWO LANE ROAD GOING IN BOTH DIRECTIONS THE AMOUNT OF TRAFFIC THAT WILL BE ADDED TO THE ALREADY CONJESTED TRAFFIC DURING PEAK TRAVEL HOURS 5-8 AM AND 3-6PM. I DONT THINK THAT CALTRANS HAS REALLY WORKED OUT THE TRAFFIC ISSUES

SSSS 12

THE AMOUNT OF RESIDENTS IN JAMUL AND THE PASSER BYERS COMING AND GOING FROM THE SURROUNDING COMMUNITIES AND ESPECIALLY ON THE WEEKENDS WHEN YOU HAVE PEOPLE GOING ON MOTORCYCLE RIDES BICYCLE RIDERS AND TRAFFIC FROM MEXICO

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting? NEWS

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

SSSS 11 Section 2.4 "Traffic and Transportation/Pedestrian and Bicycle Facilities" of the Final EIR concludes that the operations at the intersections and roadways segments along SR-94 will be improved or will not change with the implementation of the Proposed Project. The section provides an assessment of three different traffic conditions: Existing Conditions, Near Term Conditions, and Horizon Year Conditions (see Final EIR Section 2.4.3). Each of these traffic conditions were evaluated in a manner consistent with Caltrans' Guide for the Preparation of Traffic Impact Studies, dated December 2002. The evaluation of these three traffic conditions provides the necessary comparison needed to evaluate whether the Proposed Project would cause a negative traffic related impact to the study area intersections. The existing conditions analysis provides an evaluation of existing traffic conditions as it uses actual vehicular count data collected in the field.

SSSS 12 Please see RTC J1.

COMMENTS	RESPONSES
SSSS 13	SSSS 13 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment: I am opposed to another disruption to highway 94 – The Jamul casino will very likely fail in federal court and all of the money and aggravation will have been for nothing.

We don't need another casino – Sycuan is 10 minutes away.

No Casino in Jamul –

Not not ever!

Do the right thing –

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
SSSS 14	SSSS 14 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-2015

Comment:

I would like to know who is being paid off. Who is having their pockets filled with the ruination of a beautiful rural area! The decimation of a peaceful quiet area of natural beauty.

Why not put a Casino in the middle of the Redwoods.

SHAME

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to;\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to;
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
SSSS 15	As currently designed for the SR-94 Improvement Project, the existing culvert at the intersection of Via las Faldas would not be modified or replaced. The comment regarding this culvert is forwarded to the Caltrans decision makers for future consideration.
SSSS 16	As currently designed, additional "no parking" signs are not included in the SR-94 Improvement Plans. The comment regarding the parking signs will be forwarded to the Caltrans decision makers for future considerations.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment: RE: Via Las Faldas intersection

• Caltrans is responsible for the culvert at the end of the road. It is frequently hit by cars driving West down highway 94, or turning right onto Via Las Faldas from the 94. Cars/trucks have hit the reflector sign so many times, it is usually just ~~[illegible]~~ laying on the ground.

• The culvert is often filled w/ mud & when it rains, the culvert overflows onto the 94. It needs better ~~maintenance~~. maintenance.

• Need: No parking signs on north side of 94 at Via Las Faldas. Semi-trucks park there to go to the 7-11. It blocks our view of the traffic. I've already sent photos to Caltrans. No response. Please add "no parking" signs there.

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES
SSSS 17	SSSS 17 Please see RTC J1.

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment: I very much think that improvements should be made at the SR-94/OTAY LAKES Rd intersection. Otay Lakes Road is the easiest, most efficient route from Eastlake/Chula Vista/South Bay to the JAMUL CASINO.

The SR-94 – OTAY LKS INTERSECTION is dangerous in its current alignment. It should be re-aligned so that Otay Lakes Rd intersects with SR-94 across from Honey Springs Rd – a 4-way intersection, ideally with traffic lights.

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8-5-15

Comment: This whole thing is illegal & should be stopped!!

SSSS 18 — 1. The Jamul Indians are NOT a recognized tribe.

SSSS 19 — 2. Construction has proceeded without due process of the environmental impact study etc. etc.

SSSS 20 — 3. The impact of increased traffic in this rural area is dangerous
- young drivers from State Canyon Rd. are greatly endangered.

SSSS 21 — 4. The water table is endangered – we are in a drought! Even if rain comes, local wells can be affected.

(Optional information, please print.)

Name

Organization

Address Jamul resident

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:
David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA 92110

SSSS 18	Please see RTC E10.
SSSS 19	Please see RTC J1.
SSSS 20	Please see RTC J1.
SSSS 21	Please see RTC E31.

COMMENTS	RESPONSES

SR-94 Improvement Project

We'd like to hear from you regarding this project. Thank you for taking the time to provide your thoughts on this form. Please place written comment forms in the Comment Box.

Date: 8/5/15

Comment:

SSSS 22 — ① Traffic on MAIN CORRIDOR ROAD flow needs to consider speed of cars - one slow truck will back up existing traffic for miles

SSSS 23 — ② when traffic backs up or someone is going slower than desired, people use turn lanes as passing lanes.
> need to put speed bumps or more poles to stop. More people on the road would Amplify behavior.
> Add a couple passing lanes in both directions between Steele canyon high school and Lyons Valley Rd.

SSSS 24 — ③ need turn lanes for Vista Diego (going east) & Vista Sage going ~~east~~ west. Very Dangerous. many times I've had to react Quickly & personally witnessed Accidents on both streets

SSSS 25 — ④ Blind curve on Lyons Valley Rd approaching

(Optional information, please print.)

Name

Organization

Address

Phone E-mail

How did you hear about this meeting?

Written comments may be submitted by e-mail to:\
SR-94_SR_94_Draft_EIR@dot.ca.gov Mail your written comments to:

David Nagy
Environmental Branch Chief
Caltrans, District 11
4050 Taylor Street, MS: 242
San Diego, CA, 92110

SSSS 22 — The analysis included in the Final EIR was prepared following the Caltrans' Guide for the Preparation of Traffic Impact Studies, dated December 2002. Per the guidelines outlined in this document, all intersections and roadway segments where the project would make modifications were analyzed in detail using the methodology and criteria stated in Caltrans' guidelines.

The analysis included in the Final EIR take into consideration the percentage of heavy vehicles, including trucks, buses and recreational vehicles traveling along the corridor to accurately evaluate the intersection and roadway segment operations based on the expected travel speeds along the corridor..

SSSS 23 — As currently design, the improvements don't include the addition of speed bumps, poles to stop or a passing lane.

SSSS 24 — The Tribal Environmental Evaluation prepared by the JIV gaming facility identified the need for permanent improvements to the State Highway System. Therefore, subject to Caltrans' oversight and independent review, the JIV is responsible for the development of a CEQA Final EIR for the improvements within the State right of way and the necessary mitigation for any impacts to traffic on SR-94.

Improvements at the intersection of Vista Sage were not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR. The required 500 feet of stopping sight distance would be provided at the Vista Diego Road driveway. Another important design factor for consideration is the corner sight distance. Per Caltrans Highway Design Manual, the minimum corner sight distance for a design speed of 55 miles per hour is 605 feet. Vehicles entering SR-94 from Vista Diego Road have in excess of 605 feet of unobstructed sight distance.

COMMENTS

cont.

SSSS 25 cont

94. If a Light is Added then potential Add a sensor to trigger a light to warn people before curve or get Rid of Blind curve. I've prayed looking in my rear view mirror before waiting for someone to come around the curve & not stop.

SSSS 26

5) No shoulder on the westbound lane on a curve just before 7-11 many migrant workers & bicyclists are in danger.

SSSS 27

6) Traffic on 94 when Stub Canyon is in session. Morning traffic would impact any commuter for employees of casino going to work & would worsen the already bad delays around the high school.

SSSS 28

7) Safety → in the event of a disaster 94 can not handle the exodus of Residents, more traffic would be a slaughter of those unable to leave.

SSSS 29

8) there should be NO Construction allowed before 7:45 AM or 2:45-3:15 due to school traffic & Activity

RESPONSES

SSSS 24 cont

The installation of the traffic signal at the intersection of Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

Furthermore, the installation of the traffic signal would allow vehicles traveling in the eastbound direction to make either a U-turn at the intersection of Lyons Valley Road to then travel westbound toward Vista Diego Road or for them to turn right onto Indians Spring Drive to then turn left from Indians Spring Drive toward Vista Diego Road.

SSSS 25

The installation of the traffic signal at the intersection of Lyons Valley Road and SR-94 was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. Required stopping sight distance is one of the standards evaluated during the design and construction of the traffic signal.

The design speed for SR-94 is 55 miles per hour. Per Caltrans Highway Design Manual, the minimum stopping sight distance for travel speeds of 55 miles per hour is 500 feet. The proposed new traffic signal would be designed to accommodate 500 feet of stopping sight distance. The stopping sight distance is important for situations in which vehicles are stopping along SR-94 attempting to make a left-turn movement.

The installation of the traffic signal at the intersection of Lyons Valley Road and SR-94 was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual.

COMMENTS	RESPONSES
	SSSS 26 Please see response to SSSS5.
	SSSS 27 The improvements evaluated in the Final EIR include the widening of SR-94 at Steele Canyon Road to provide an additional eastbound and westbound travel lane in each direction. The proposed project includes intersection and roadway segment improvements along SR-94. Each of the improvements would be implemented to meet Caltrans Highway Design Manual standards and the California Manual on Traffic Control Devices. These standard have been established by the California Department of Transportation to maintain the safety of traveling along State Route facilities for all users. The Final EIR evaluation determined that the improvement would be consistent with the System Preservation and Safety Goal of the existing State, Regional and Local Plans and Programs given that all improvements would be designed and built consistent with Caltrans' design manual and maintained by Caltrans (within the State ROW).
	SSSS 28 Please see response to G9.
	SSSS 29 As part of the implementation of the proposed project, a Transportation Management Plan (TMP) would be prepared according to Caltrans' Deputy Directive 60-R2 (DD-60-R2). The TMP will specify allowable work hours based on traffic patterns along SR-94 to minimize the additional delays to commuter and school related traffic.

COMMENTS

From: bobon@rainyvalley.net
To: SR-94_SR_94_Draft_EIR@DOT
Subject: SR-94
Date: Thursday, August 27, 2015 2:36:33 PM

To Whom it may concern,
I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons:

TTTT1 1. Material review period is insufficient time for public to review and provide comments.
TTTT2 2. July-August is vacation time for many who will not even see the EIR until too late.
TTTT3 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.
TTTT4 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.
TTTT5 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)
TTTT6 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.
TTTT7 7. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.
TTTT8 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.
TTTT9 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?
TTTT10 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?
TTTT11 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?
TTTT12 12. No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?
TTTT13 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?
TTTT14 14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification?
TTTT15 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?
TTTT16 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.
TTTT17 17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.
TTTT18 18. Caltrans has failed to service the public trust by ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.
TTTT19 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?

TTTT20 I, Nancy Bobo, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

RESPONSES

TTTT1 The 45-day public review period provided is as required by State law.

TTTT2 Please see RTC JJJJ3.

TTTT3 Please see RTC L1.

TTTT4 Please see RTC B1.

TTTT5 Please see RTC B1.

TTTT6 Caltrans has taken into consideration public input regarding safety on SR-94. Please note that the project features presented in Chapter 1.0 of the Final EIR would improve, on the whole, operations on SR-94. The JIV is responsible for ensuring that all project mitigation is implemented. Also, please see RTC B1.

TTTT7 Please see RTC TTTT6.

TTTT8 Caltrans did require and JIV was issued an encroachment permit for use of the SR-94 right-of-way during construction of the JIV Gaming Development Project for placement of flaggers and signage to enhance and ensure safety while trucks entered and exited the JIV gaming facility construction site. The Proposed Project will require an encroachment permit from Caltrans to install the portions of the SR-94 Improvements that would be located within Caltrans right-of-way.

TTTT9 The commenter appears to be questioning whether the traffic impacts of the JIV Gaming Development Project will be adequately mitigated. The JIV gaming facility is not the project analyzed in this Final EIR (please see RTC B1, B2 and C1). The Proposed Project consists of traffic improvement measures that were identified in the FTEE for the JIV Gaming Development Project.

COMMENTS	RESPONSES
	TTTT 10 The objective of the Proposed Project is to implement traffic mitigation measures identified in the FTEE for the JIV Gaming Development Project. Such mitigation measures did not include improvements at Otay Lakes Road.
	TTTT 11 The objective of the Proposed Project is to implement traffic mitigation measures identified in the FTEE for the JIV Gaming Development Project. Such mitigation measures did not include improvements at Honey Springs Road.
	TTTT 12 The objective of the Proposed Project is to implement traffic mitigation measures identified in the FTEE for the JIV Gaming Development Project. Such mitigation measures did not include improvements at Jamul Drive.
	TTTT 13 The objective of the Proposed Project is to implement traffic mitigation measures identified in the FTEE for the JIV Gaming Development Project. Such mitigation measures did not include improvements at Steele Canyon Road.
	TTTT 14 Traffic studies and analysis for traffic signals must consider the effects on any upstream or downstream intersections and be based on a reasonable speed and capacity for the impacted state highway. The design standard calls for a signal spacing of a 1/2-mile and right turn only access at 1/4-mile spacing. Along certain corridors where 1/2-mile spacing is not achievable, proposed signalized intersections may have spacing at 1/4-mile increments or greater with no additional access points.
	TTTT 15 The Proposed Project consists of roadway and intersection improvements designed to improve traffic levels of service and safety and thus emergency access. Please see RTC G9.
	TTTT 16 The Proposed Project consists of roadway and intersection improvements and will not increase traffic on the roads. Please see RTC B1, B2 and C1.

COMMENTS	RESPONSES
	TTTT 17 The Proposed Project consists of roadway and intersection improvements and will not increase traffic on the roads. Please see RTC L1.
	TTTT 18 Please see RTC K3.
	TTTT 19 Please see RTC K3.
	TTTT 20 Please see RTC UUU6.

COMMENTS	RESPONSES
From: Michael Casinelli To: SR-94_SR_94_Draft_EIR@DOT Subject: Comments for Proposed SR 94 Improvement Project Date: Wednesday, August 26, 2015 10:02:12 AM **August 26, 2015** **Mr. David Nagy** **Environmental Branch Chief** **California Department of Transportation** **District 11** **4050 Taylor Street, MS 242** **San Diego, CA 92110** **RE: Comments for Proposed SR 94 Improvement Project** **1.** Material review period is insufficient time for public to review and provide comments. **2.** July-August is vacation time for many who will not even see the EIR until too late. **3.** EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. **4.** Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. **5.** The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** **6.** Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. **7.** **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** **8.** **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** **9.** Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? **10.** Community and drivers of SR 94 have repeatedly asked Caltrans to address	Form Letter: Please see RTC TTT1-20.

COMMENTS	RESPONSES

Otay Lakes Road access to SR 94. No mitigation proposed. Why?

11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?

12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why?

13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?

14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?

15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?

16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.

17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**

18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**

19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?

I, Michael Casinelli, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

Michael Casinelli
3268 Armagosa Way
Jamul, CA 91935

COMMENTS	RESPONSES
August 26, 2015 Mr. David Nagy Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 **RE: Comments for Proposed SR 94 Improvement Project** 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES

12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why?
13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?
14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?
15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?
16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.
17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**
18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**
19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?

I, Michael Casinelli, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

Michael Casinelli
3268 Armagosa Way
Jamul, CA 91935

COMMENTS	RESPONSES
From: Phyllis Dozier **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Comments for Proposed SR 94 Improvement Project **Date:** Thursday, August 27, 2015 7:22:53 PM **David Nagy, Environmental Branch Chief** SR-94_SR_94_Draft_EIR@dot.ca.gov **Comments for Proposed SR 94 Improvement Project** 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I,Phyllis Dozier , want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. ----------	

COMMENTS	RESPONSES
From: Michelle Duke **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** SR-94 **Date:** Thursday, August 27, 2015 7:41:35 PM To Whom it may concern, I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. (San Diego County, California) Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons: 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I, Michelle Dyke want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	

COMMENTS	RESPONSES
August 27, 2015 From: James Harmon 14365 Olive Vista Jamul, Ca. 91935 To: David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 I, James Harmon, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. James Harmon Following is a list of my major concerns: • EIR document is seriously flawed. It falls throughout to address the community and public's safety and welfare. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. • Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? • Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? • Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? • No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? • Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? • No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? • No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. • Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. • There is no proposed mitigation for Cougar Canyon Way at the high school. Why? • Business owners at 94 and Steele Canyon will be loosing parking space which will financially impact their businesses. This would affect California Sol, the produce market, the flower shop and the Deli. • 16 Million dollars for mitigation is not enough. • There must be a time frame set for mitigating the problems that will be caused. Completing them after the planned completion of the casino will not suffice.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
August 27, 2015 From: Chad Hines 13911 Via De Jamul Jamul, Ca. 91935 To: David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 I, Chad Hines, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Following is a list of my major concerns: • EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. • Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? • Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? • Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? • No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? • Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? • No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? • No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. • Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. • There is no proposed mitigation for Cougar Canyon Way at the high school. Why? • Business owners at 94 and Steele Canyon will be loosing parking space which will financially impact their businesses. This would affect California Sol, the produce market, the flower shop and the Deli. • 16 Million dollars for mitigation is not enough. • There must be a time frame set for mitigating the problems that will be caused. Completing them after the planned completion of the casino will not suffice.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
August 27, 2015 From: Danielle Hines 14365 Olive Vista Jamul, Ca. 91935 To: David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 I, Danielle Hines, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Following is a list of my major concerns: Danielle Hines • EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. • Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? • Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? • Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? • No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? • Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? • No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? • No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. • Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. • There is no proposed mitigation for Cougar Canyon Way at the high school. Why? • Business owners at 94 and Steele Canyon will be loosing parking space which will financially impact their businesses. This would affect California Sol, the produce market, the flower shop and the Deli. • 16 Million dollars for mitigation is not enough. • There must be a time frame set for mitigating the problems that will be caused. Completing them after the planned completion of the casino will not suffice.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
August 27, 2015 From: Dennis Hines 13911 Via de Jamul Jamul, Ca. 91935 To: David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 I, Dennis Hines, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Following is a list of my major concerns: • EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. • Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? • Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? • Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? • No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? • Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? • No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? • No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. • Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. • There is no proposed mitigation for Cougar Canyon Way at the high school. Why? • Business owners at 94 and Steele Canyon will be loosing parking space which will financially impact their businesses. This would affect California Sol, the produce market, the flower shop and the Deli. • 16 Million dollars for mitigation is not enough. • There must be a time frame set for mitigating the problems that will be caused. Completing them after the planned completion of the casino will not suffice.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
August 27, 2015 From: Diane Hines 13911 Via de Jamul Jamul, Ca. 91935 To: David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 I, Diane Hines, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Following is a list of my major concerns: Diane Hines • EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. • Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? • Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? • Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? • No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? • Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? • No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? • No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. • Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. • There is no proposed mitigation for Cougar Canyon Way at the high school. Why? • Business owners at 94 and Steele Canyon will be loosing parking space which will financially impact their businesses. This would affect California Sol, the produce market, the flower shop and the Deli. • 16 Million dollars for mitigation is not enough. • There must be a time frame set for mitigating the problems that will be caused. Completing them after the planned completion of the casino will not suffice.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
August 27, 2015 From: Nathan Hines (proprietor of California Sol) 12891 Campo Road Spring Valley, Ca. 91978 To: David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 I, Nathan Hines, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Following is a list of my major concerns: NATHAN HINES • EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. • Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? • Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? • Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? • No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? • Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? • No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? • No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. • Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. • Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. • NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. • There is no proposed mitigation for Cougar Canyon Way at the high school. Why? • Business owners at 94 and Steele Canyon will be loosing parking space which will financially impact their businesses. This would affect California Sol, the produce market, the flower shop and the Deli. • 16 Million dollars for mitigation is not enough. • There must be a time frame set for mitigating the problems that will be caused. Completing them after the planned completion of the casino will not suffice.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
From: Denise Jermyn **To:** SR-94_SR_94_Draft_EIR@DOT **Date:** Thursday, August 27, 2015 1:25:12 PM T o Whom it may concern, I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons: 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I, Denise Jermyn want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Thank You, Denise Jermyn | President + Peanut Butter Connoisseur **Continental Catering** call 619.698.3500 web ContinentalCateringSD.com mail 8238 Parkway Drive La Mesa, CA 91942 Photos courtesy of the Wanders Photography	

COMMENTS	RESPONSES
From: Hope Keesling **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Comments for Proposed SR 94 Improvement Project in Jamul, CA **Date:** Thursday, August 27, 2015 3:30:10 PM 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? We, Hope & David Keesling, 3710 Rudnick Drive, Jamul, CA, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	

COMMENTS	RESPONSES
August 26, 2015 David Nagy Environmental Branch Chief Caltrans **Comments for Proposed SR 94 Improvement Project** 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I,_Steve Manson_____ want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Steve Manson 3145 Kemberly Lane Jamul, Ca 91935 619-520-2092	

COMMENTS	RESPONSES
From: Glen or Verna **To:** SR94_SR_94_Draft_EIR@DOT **Subject:** Proposed SR94 Improvement Project **Date:** Thursday, August 27, 2015 10:07:50 AM Please consider my concerns regarding the safety of our youth, all of us who drive 94 daily, and the failure on the part of Caltrans to follow EEQA gidelines and proper mitigation procedures: 1. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 2. Caltrans has chosen to divide the mitigation process in CEQA by *allowing a commercial enterprise to begin construction without proper environmental review and mitigation*. 3. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 4. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 5. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 6. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 7. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 8. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 9. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 10. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 11. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 12. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 13. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 14. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 15. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 16. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 17. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
We, Glen and Verna Poorbaugh, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Caltrans has grossly failed to consider the safety issues of Highway 94 and it's access roads. Jamul is a high fire danger area, your proposal for 94 would be disastrous in any kind of an emergency situation. Sincerely, Glen & Verna Poorbaugh	

COMMENTS	RESPONSES
From: Spurgeon, Alison **To:** SR-94_SR_94_Draft_EIR@DOT **Cc:** Lisa Darroch **Subject:** RE: HIGHWAY 94 FATALITY 8.27 **Date:** Thursday, August 27, 2015 1:45:56 PM *Good Day,* *Might I add WHILE I WAS WRITING THIS EMAIL, a fatality accident has taken place on the 94 at Steele Canyon Road.* *This is EXACLTY why your plans for Highway 94 to help a casino are inept and downright dangerous.* *Hope you can sleep at night.* *Alison Spurgeon* **Alison W. Spurgeon** T 858 547 8810 F 858 547 1885 M 619 248 1787 E alison.spurgeon@akzonobel.com **International Paint LLC** 7077 Consolidated Way, #A San Diego, Ca 92121 www.akzonobel.com AkzoNobel Follow AkzoNobel online at www.akzonobel.com/followus ---------- The information contained in this message, including any attachments, may be privileged and confidential and is intended only for the use of the individual and/or entity identified in the address of this message. If you are not an intended recipient, please notify the sender and delete and destroy this message, including any back-up copies. Please refer to www.akzonobel.com/legal-entities for further legal information regarding the sending entity if from the EU, Croatia, Norway, Turkey, Ukraine or Switzerland. ---------- **From:** Spurgeon, Alison **Sent:** Thursday, August 27, 2015 1:22 PM **To:** 'SR-94_SR_94_Draft_EIR@dot.ca.gov' **Subject:** HIGHWAY 94 *Good Day,* *I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons:* *1. Material review period is insufficient time for public to review and provide comments.*	The comment is noted and forwarded to the decision makers for consideration. Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
2. July-August is vacation time for many who will not even see the EIR until too late. *3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.* *4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.* *5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)* *6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.* *7. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.* *8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.* *9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?* *10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?* *11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?* *12. No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?* *13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?* *14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification?* *15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?* *16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.* *17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.* *18. Caltrans has failed to service the public trust by ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.* *19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?* *I would like to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California*	

COMMENTS	RESPONSES
taxpayers. *Sincerely,* **Alison W. Spurgeon** T 858 547 8810 F 858 547 1885 M 619 248 1787 E alison.spurgeon@akzonobel.com **International Paint LLC** 7077 Consolidated Way, #A San Diego, Ca 92121 www.akzonobel.com Follow AkzoNobel online at www.akzonobel.com/followus ---------- The information contained in this message, including any attachments, may be privileged and confidential and is intended only for the use of the individual and/or entity identified in the address of this message. If you are not an intended recipient, please notify the sender and delete and destroy this message, including any back-up copies. Please refer to www.akzonobel.com/legal-entities for further legal information regarding the sending entity if from the EU, Croatia, Norway, Turkey, Ukraine or Switzerland. ----------	

COMMENTS	RESPONSES
From: Spurgeon, Alison **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** HIGHWAY 94 **Date:** Thursday, August 27, 2015 1:21:43 PM *Good Day,* *I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons:* *1. Material review period is insufficient time for public to review and provide comments.* *2. July-August is vacation time for many who will not even see the EIR until too late.* *3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.* *4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.* *5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)* *6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.* *7. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.* *8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.* *9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?* *10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?* *11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?* *12. No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?* *13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?* *14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification?* *15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?* *16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.*	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. *18. Caltrans has failed to service the public trust by ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.* *19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?* *I would like to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.* *Sincerely,* **Alison W. Spurgeon** T 858 547 8810 F 858 547 1885 M 619 248 1787 E alison.spurgeon@akzonobel.com **International Paint LLC** 7077 Consolidated Way, #A San Diego, Ca 92121 www.akzonobel.com AkzoNobel Follow AkzoNobel online at www.akzonobel.com/followus ---------- The information contained in this message, including any attachments, may be privileged and confidential and is intended only for the use of the individual and/or entity identified in the address of this message. If you are not an intended recipient, please notify the sender and delete and destroy this message, including any back-up copies. Please refer to www.akzonobel.com/legal-entities for further legal information regarding the sending entity if from the EU, Croatia, Norway, Turkey, Ukraine or Switzerland. ----------	

COMMENTS	RESPONSES
Caltrans Public Hearing Comments August 5, 2015 1. Material Review period is insufficient time for public to review and provide comments. 2. July – August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout the document to address the community's and the public's safety and welfare. 4. Caltrans has chosen to bifurcate the mitigation process in the CEQA by allowing unlawfully to begin construction of a commercial enterprise without prior environmental review and mitigation. 5. Currently, the public safety has been compromised by allowing the construction traffic to access the site on Highway 94 without prior mitigation. Over 300 or more employee car trips a day plus 20 to 50+ cement trucks, dirt haulers and delivery vehicles are using the SR94 without any mitigation except for signs, flagmen and a CHP car using his phone. 6. Caltrans has failed to listen to the public and the community concerning their long term concerns for the safety of the Level F road. (OVER)	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
7. Caltrans in writing has promised the community that they would require the same level of scrutiny and hold responsible any developer to the rules and regulations of Caltrans and the State of California including following CEQA. 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the required stipulations being met as they have of all other developers located in the SR94 corridor. 9. Items of concern included the lack of addressing all the feeder streets to SR 94 and all private driveways which access SR9r. We have established evidence of the dangers of these roads already. Yet there is no mitigation. 10. We have repeatedly said Caltrans must address the Otay Lakes Road access on to SR94. This is a dangerous crossing. Yet there is no mention. 11. Honey Springs Road access on to 94 is not addressed. This will compound the traffic coming through from Dulzura, Tecate, Potrero and off of the Otay Lakes Road.	

COMMENTS	RESPONSES
12. Las Palmas, Hillside Dr. Maxfield, Indian Springs, Vista Diego, Rancho Miguel Dr.,Via Las Faldas,Pine Lane, Fair Oaks, Fair Acres, Marlena Wy, Aurora Vista Dr., Florence Terrace, Ariana,Rancho Oaks, Stoney Oak Dr, Via Marbella, all the streets off Old Campo Rd, Noah's Home, Steele Canyon High School and Millar Ranch Road plus all the private driveways will be impacted and are not addressed or mitigated. 13. No mention of the impact to Jamul Dr. when traffic is forced to seek an alternate route. 14. No mention of the impact to Steele Canyon Rd and all the streets and driveways access Steele Canyon. 15. No mention of the impacts of improperly placed traffic lights within a shorter distance than even Caltrans regulations state. 16. No mention of how the emergency services times will be mitigated by the increased traffic impacts. 17. No mention of what mitigation will deal with the lengthy drive time impacts from the traffic generated out of this commercial enterprise OVER	

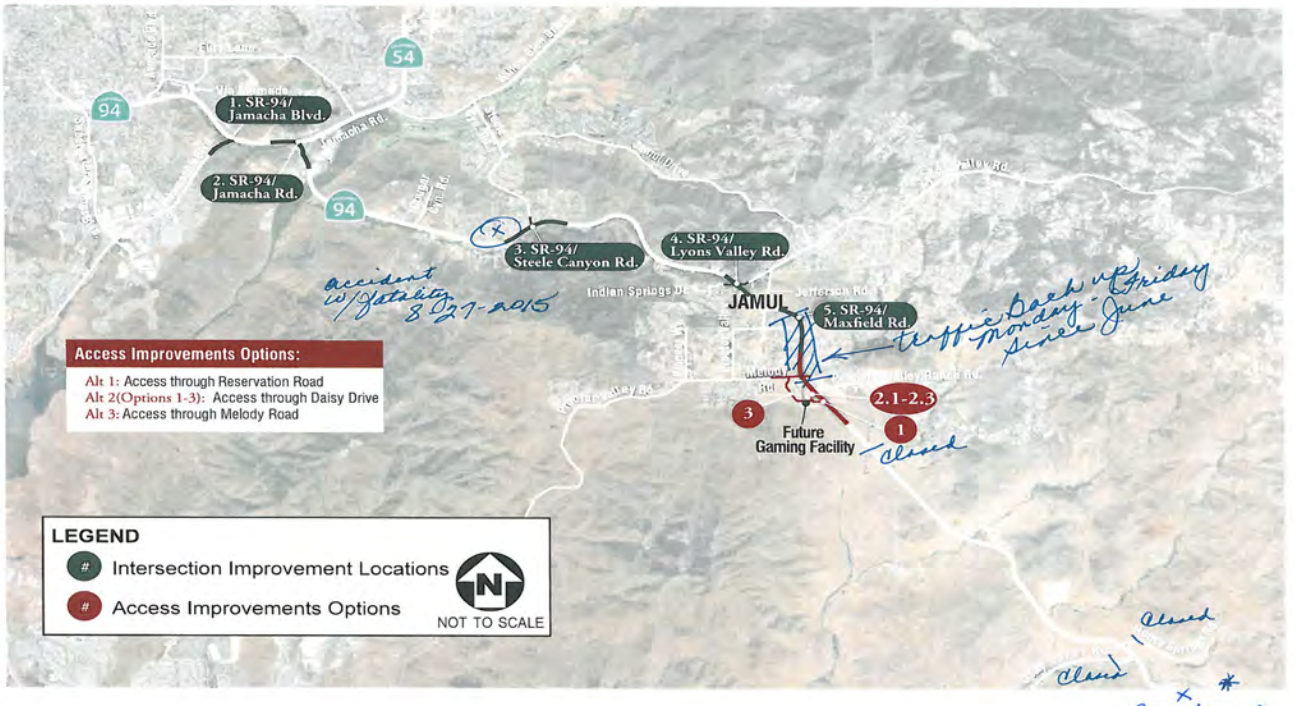
COMMENTS	RESPONSES
including the school buses and parents taking school children to the local schools. 18. Caltrans has failed to service the public trust by allowing an exemption for San Diego Gas & Electric to run a new power source specifically to operate a commercial enterprise along SR94 without a CEQA or proper mitigation. 19. Caltrans is allowing SDG&E to use SR94 for its route when SR94 was just paved at taxpayers' expense of over $14,000,000. 20. I will be adding to my comments as I finish the review of this re-run of the previous EE. 21. I want to go on record that the CEQA is a flawed, biased document that has failed the taxpayers of California.	

COMMENTS	RESPONSES
Caltrans Public Hearing Comments August 5, 2015 1. Material Review period is insufficient time for public to review and provide comments. 2. July – August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout the document to address the community's and the public's safety and welfare. 4. Caltrans has chosen to bifurcate the mitigation process in the CEQA by allowing unlawfully to begin construction of a commercial enterprise without prior environmental review and mitigation. 5. Currently, the public safety has been compromised by allowing the construction traffic to access the site on Highway 94 without prior mitigation. Over 300 or more employee car trips a day plus 20 to 50+ cement trucks, dirt haulers and delivery vehicles are using the SR94 without any mitigation except for signs, flagmen and a CHP car using his phone. 6. Caltrans has failed to listen to the public and the community concerning their long term concerns for the safety of the Level F road. 3	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
7. Caltrans in writing has promised the community that they would require the same level of scrutiny and hold responsible any developer to the rules and regulations of Caltrans and the State of California including following CEQA. 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the required stipulations being met as they have of all other developers located in the SR94 corridor. 9. Items of concern included the lack of addressing all the feeder streets to SR 94 and all private driveways which access SR9r. We have established evidence of the dangers of these roads already. Yet there is no mitigation. 10. We have repeatedly said Caltrans must address the Otay Lakes Road access on to SR94. This is a dangerous crossing. Yet there is no mention. 11. Honey Springs Road access on to 94 is not addressed. This will compound the traffic coming through from Dulzura, Tecate, Potrero and off of the Otay Lakes Road.	

COMMENTS	RESPONSES
12. Las Palmas, Hillside Dr. Maxfield, Indian Springs, Vista Diego, Rancho Miguel Dr.,Via Las Faldas,Pine Lane, Fair Oaks, Fair Acres, Marlena Wy, Aurora Vista Dr., Florence Terrace, Ariana,Rancho Oaks, Stoney Oak Dr, Via Marbella, all the streets off Old Campo Rd, Noah's Home, Steele Canyon High School and Millar Ranch Road plus all the private driveways will be impacted and are not addressed or mitigated. 13. No mention of the impact to Jamul Dr. when traffic is forced to seek an alternate route. 14. No mention of the impact to Steele Canyon Rd and all the streets and driveways access Steele Canyon. 15. No mention of the impacts of improperly placed traffic lights within a shorter distance than even Caltrans regulations state. 16. No mention of how the emergency services times will be mitigated by the increased traffic impacts. 17. No mention of what mitigation will deal with the lengthy drive time impacts from the traffic generated out of this commercial enterprise 6	

COMMENTS	RESPONSES
including the school buses and parents taking school children to the local schools. 18. Caltrans has failed to service the public trust by allowing an exemption for San Diego Gas & Electric to run a new power source specifically to operate a commercial enterprise along SR94 without a CEQA or proper mitigation. 19. Caltrans is allowing SDG&E to use SR94 for its route when SR94 was just paved at taxpayers' expense of over $14,000,000. 20. I will be adding to my comments as I finish the review of this re-run of the previous EE. 21. I want to go on record that the CEQA is a flawed, biased document that has failed the taxpayers of California.	



COMMENTS

RESPONSES

COMMENTS	RESPONSES
Page 1 of 1 Thursday, August 27, 2015 6:45am Cattrans TMP for Casino workers. Note Cars parked the length of 94 (well over 1 mile). Workers also park along residential side streets waiting to go into newly created parking lot, impeding normal traffic flow. 8	

COMMENTS	RESPONSES

East County Magazine
Published on *East County Magazine* (http://eastcountymagazine.org)

August 14, 2015 accident on SR 94

CHP AND SUPERVISOR JACOB RESPOND TO ECM INQUIRY ON 10-HOUR CLOSURE OF HIGHWAY 94

Share / Save

August 2015 Articles

Jamul State Route 94 highway 94 accidents CHP Dianne Jacob

By Miriam Raftery

Photo: Joseph Zatarain, Potrero Town on Facebook

August 18, 2015 (Jamul) – On Sunday, we reported on a 10-hour closure of State Route 94 last Friday due to a head-on collision involving a semi-truck that left many local residents stranded and angry by the long delays. Our story included documentation of numerous past lengthy closures on the highway in the Jamul area provided by the Deerhorn Valley Antler editor.We asked the California Highway Patrol and Supervisor Dianne Jacob for comments on this serious issue.

Supervisor Jacob responded, "The public has every reason to be outraged, given the length of the closure, the dangerously high temperatures that day and the lack of communication from state authorities. I will be sharing those concerns with the Caltrans, CHP and other state officials. Drivers are already at risk on this dangerous and congested state highway, and the situation will become even more dangerous if a casino opens. Thousands of lives are at risk in the event there is a need for an evacuation of the area with nowhere to go."

Kevin Pearlstein, public information officer for the California Highway Patrol in El Cajon, today advised East County Magazine that the delay was due in part to the truck shifting and dropping part of its load. The accident caused five injuries,two major and three minor to moderate, he added, and providing additional details:

According to Pearlstein, the crash happened at 10:20 a.m. He said Sheriff deputies began assisting in traffic control at 10:49 a.m. and a SIG Alert was issued at 11:02 a.m. (A SIG Alert icon did appear on the CalTrans map, but the incident was inexplicably not listed in the "trouble" areas section despite the 10-hour closure. Many members of the public, media and officials were not aware of the closure.

"At 11:54 a.m. the tow began to upright the semi," said Pearlstein. "Unfortunately, the load shifted and poured out of the side of the trailer. At 1:11 p.m. they were attempting to open the road, but the tow was having difficulty."

Motorists have advised ECM that the road did not open until after 8 p.m. Some complained of inadequate notification, entering highway 94 after the crash occurred and becoming stuck in long traffic lines. Deerhorn Valley Antler reported concerns over motorists stranded for hours in 100 degree-plus heat.

COMMENTS	RESPONSES

The U.S. Border Patrol was running water to motorists waiting for the roadway to reopen, he said, adding that drivers were advised of alternate routes around traffic via Buckman Springs, I-8, Honey Springs Road, Japatul and other options.

He confirmed that an ambulance was advised of the closure and the emergency call for an unrelated patient was rerouted at 6:34 p.m.

As for residents' complaints over lack of media coverage, Pearlstein has promised to inform East County Magazine via e-mail of future emergencies. (You can follow our EastCountyAlert on Twitter.com or sign up to get our alerts via email at www.EastCountyMagazine.org) Pearlstein said he is aware of one media outlet, NBC7, that learned of the accidents and sent an alert.

As for how to prevent such long delays in the future, Pearlstein had this to say. "As you know, the 94 is a two lane highway. At many locations there are no shoulders, it is just wide enough for two vehicles to share at the same time. It is the mission of the CHP to lower the mileage death rate thru strict enforcement of speed, dui, and seatbelts. Last year the El Cajon office had 60,000 enforcement contacts. We will continue with our daily duties in an effort to keep drivers safe thru education and enforcement."

Powered by Drupal

Source URL (modified on 08/18/2015 - 19:44): http://eastcountymagazine.org/chp-and-supervisor-jacob-respond-ecm-inquiry-10-hour-closure-highway-94

COMMENTS	RESPONSES

1 dead, 3 injured in SR-94 collision in Jamul

(/staff/pauline-repard/)

By Pauline Repard (/staff/pauline-repard/) | 1:41 p.m. Aug. 27, 2015 | Updated , 2:53 p.m.

The SUV driver died and three people were injured in a collision with the USA cab van on SR-94 at Marl
Gibbins

EAST COUNTY — The 75-year-old driver of an SUV died in a head-on collision with a wheelchair transp
Jamul Thursday, authorities said.

Three people in the USA Cab transport van suffered minor injuries and were taken to a hospital by ambu

The name of the Chevrolet Blazer SUV driver, a Jamul man, was not released. The California Highway F
suffered a medical condition before the crash.

The head-on collision occurred about 12:50 p.m. Thursday near Marlena Way, near Rancho Feed and P
Canyon Road.

A witness, Matt Goodman, 25, of Jamul, said he was about 300 feet ahead of the Blazer, going east, as

11

COMMENTS	RESPONSES

intersection. When he glanced at his rear-view mirror, he saw the SUV and van in the middle of the road damage.

"I backed up and got out to see if everyone was OK," Goodman said. He checked first on the SUV driver pulse," Goodman said. "Then I went to the taxi van. Everyone seemed OK. No one was unconscious. Th were just in shock."

One of the three inside was a woman who had been in a wheelchair in the back of the van, but was throv Goodman said.

The Blazer driver veered out of his eastbound lane, crossed the 12-foot center turn lane and continued i the path of the taxi van, CHP Officer Kevin Pearlstein said. He said it wasn't clear why the Blazer went i there was no driveway on that side of the road to enter.

"He may have suffered a heart attack," Pearlstein said. "We won't know until an autopsy."

He said the 45-year-old male taxi driver and two passengers, both women, had minor injuries.

Traffic was closed in both directions for a time, but parents trying to pick up students at nearby Steele Ca escorted through.

© Copyright 2015 The San Diego Union-Tribune. All rights reserved.

12

COMMENTS	RESPONSES

CORRECTION & UPDATE
Crash at 94 & Marlena Way

August 27, 2015

WESTBOUND traffic (headed to Jamul from Rancho San Diego) prevented from turning right at the RSD Shopping area (Jamacha and Campo Rd). Need to try and use Willow Glen to Jamul Drive to Skyline. Very backed up.

EASTBOUND traffic (headed from Jamul/Deerhorn to town) is being diverted to Steele Canyon Road. That is almost at a standstill trying to get to Willow Glen.

Fatal Accident

COMMENTS	RESPONSES
Caltrans Public Hearing Comments August 5, 2015 1. Material Review period is insufficient time for public to review and provide comments. 2. July – August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout the document to address the community's and the public's safety and welfare. 4. Caltrans has chosen to bifurcate the mitigation process in the CEQA by allowing unlawfully to begin construction of a commercial enterprise without prior environmental review and mitigation. 5. Currently, the public safety has been compromised by allowing the construction traffic to access the site on Highway 94 without prior mitigation. Over 300 or more employee car trips a day plus 20 to 50+ cement trucks, dirt haulers and delivery vehicles are using the SR94 without any mitigation except for signs, flagmen and a CHP car using his phone. 6. Caltrans has failed to listen to the public and the community concerning their long term concerns for the safety of the Level F road.	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
7. Caltrans in writing has promised the community that they would require the same level of scrutiny and hold responsible any developer to the rules and regulations of Caltrans and the State of California including following CEQA. 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the required stipulations being met as they have of all other developers located in the SR94 corridor. 9. Items of concern included the lack of addressing all the feeder streets to SR 94 and all private driveways which access SR9r. We have established evidence of the dangers of these roads already. Yet there is no mitigation. 10. We have repeatedly said Caltrans must address the Otay Lakes Road access on to SR94. This is a dangerous crossing. Yet there is no mention. 11. Honey Springs Road access on to 94 is not addressed. This will compound the traffic coming through from Dulzura, Tecate, Potrero and off of the Otay Lakes Road.	

COMMENTS	RESPONSES
12. Las Palmas, Hillside Dr. Maxfield, Indian Springs, Vista Diego, Rancho Miguel Dr.,Via Las Faldas,Pine Lane, Fair Oaks, Fair Acres, Marlena Wy, Aurora Vista Dr., Florence Terrace, Ariana,Rancho Oaks, Stoney Oak Dr, Via Marbella, all the streets off Old Campo Rd, Noah's Home, Steele Canyon High School and Millar Ranch Road plus all the private driveways will be impacted and are not addressed or mitigated. 13. No mention of the impact to Jamul Dr. when traffic is forced to seek an alternate route. 14. No mention of the impact to Steele Canyon Rd and all the streets and driveways access Steele Canyon. 15. No mention of the impacts of improperly placed traffic lights within a shorter distance than even Caltrans regulations state. 16. No mention of how the emergency services times will be mitigated by the increased traffic impacts. 17. No mention of what mitigation will deal with the lengthy drive time impacts from the traffic generated out of this commercial enterprise	

COMMENTS	RESPONSES
including the school buses and parents taking school children to the local schools. 18. Caltrans has failed to service the public trust by allowing an exemption for San Diego Gas & Electric to run a new power source specifically to operate a commercial enterprise along SR94 without a CEQA or proper mitigation. 19. Caltrans is allowing SDG&E to use SR94 for its route when SR94 was just paved at taxpayers' expense of over $14,000,000. 20. I will be adding to my comments as I finish the review of this re-run of the previous EE. 21. I want to go on record that the CEQA is a flawed, biased document that has failed the taxpayers of California. Marcia and Michael Surgeon P.O. Box 1133 Jamul, CA 91935	

COMMENTS	RESPONSES
From: Brenda Swann **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** State of California Taxpayer - Strong Opposition of Changes to SR-94 **Date:** Friday, August 28, 2015 9:14:59 AM T o Whom it may concern, I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons: 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.**	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I, Brenda Swaim want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	

COMMENTS	RESPONSES
From: Kirk Venzor **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** State Route 94 Proposed Changes **Date:** Friday, August 28, 2015 12:32:42 PM To Whom it may concern, I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons: 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I,Kirk A. Venzor want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Thanks, Kirk A. Venzor 32 Year Jamul Resident	

COMMENTS	RESPONSES
From: Aimee Weatherred To: SR-94_SR_94_Draft_EIR@DOT Subject: Proposed SR 94 "Improvement" project Date: Thursday, August 27, 2015 9:31:45 PM -- **David Nagy, Environmental Branch Chief** SR-94_SR_94_Draft_EIR@dot.ca.gov **Comments for Proposed SR 94 Improvement Project** 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.** 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.** 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? I, Aimee Weatherred_ want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	

COMMENTS	RESPONSES
Howard M. Whitfield 14781 Vista La Quebrada Jamul, CA 91935-4027 August 26, 2015 David Nagy, Environmental Branch Chief California Department of Transportation District 11 4050 Taylor Street, MS 242 San Diego, CA 92110 Dear Mr. Nagy, 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.) 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed. 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES

alert on SR 94. Why?

13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?

14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification?

15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?

16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.

17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.

18. Caltrans has failed to service the public trust by ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.

19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?

I, Howard M. Whitfield, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

Yours truly,

Howard M. Whitfield

COMMENTS	RESPONSES
From: Jerry Williams **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Comments for Proposed SR 94 Improvement Project **Date:** Thursday, August 27, 2015 10:23:53 PM Comments for Proposed SR 94 Improvement Project > > 1. Material review period is insufficient time for public to review and provide comments. > 2. July-August is vacation time for many who will not even see the EIR until too late. > 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. > 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. > 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.) > 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. > 7. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed. > 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. > 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? > 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? > 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? > 12. No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? > 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? > 14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? > 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? > 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. > 17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. > 18. Caltrans has failed to service the public trust by ALLOWING AN EXEMPTION TO	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION. > 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing? > > I, Jerry Williams want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers. Thank you Jerry Williams Sent from my Verizon Wireless 4G LTE smartphone	

COMMENTS	RESPONSES
	Form Letter: Please see RTC TTTT1-20.

From: Danielle Wilson
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Comments for Proposed SR 94 Improvement Project
Date: Wednesday, August 26, 2015 2:49:23 PM

1. Material review period is insufficient time for public to review and provide comments.
2. July-August is vacation time for many who will not even see the EIR until too late.
3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.
4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.
5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)**
6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.
7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.**
8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.**
9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?
10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?
11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?
12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why?
13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?
14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?
15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?
16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.
17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**
18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**
19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?

I, Danielle Wilson want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

Danielle Wilson

COMMENTS	RESPONSES
From: Mitch Wilson **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Fwd: Comments for Proposed SR 94 Improvement Project **Date:** Wednesday, August 26, 2015 2:59:10 PM Sent from my iPhone Begin forwarded message: **From:** Danielle Wilson <finebeers@hotmail.com> **Date:** August 26, 2015 at 2:54:00 PM PDT **To:** "mitchw.dale@gmail.com" <mitchw.dale@gmail.com> **Subject: FW: Comments for Proposed SR 94 Improvement Project** ---------- From: finebeers@hotmail.com To: sr-94_sr_94_draft_eir@dot.ca.gov Subject: Comments for Proposed SR 94 Improvement Project Date: Wed, 26 Aug 2015 14:50:21 -0700 1. Material review period is insufficient time for public to review and provide comments. 2. July-August is vacation time for many who will not even see the EIR until too late. 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.) 6. Caltrans has repeatedly failed to listen to the public and the	Form Letter: Please see RTC TTTT1-20.

COMMENTS	RESPONSES
community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. 7. Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed. 8. Caltrans has failed the public trust by allowing a private entity to begin construction without an encroachment permit and all the other rules and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor. 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? 12. No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? 14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state. Where is the justification? 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. 17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL. 18. Caltrans has failed to service the public trust by ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE	

COMMENTS	RESPONSES
along SR 94 WITHOUT CEQA OR PROPER MITIGATION.	
19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?	
I, Mitch Wilson want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	

COMMENTS

August 26, 2015

Rene L. Cardinale
3177 Marlena Way
Spring Valley, CA 91978

Re: Property at 12863 Campo Road, Spring Valley, CA 91978 (APN 596-040-69)

UUUU 1

I own the commercial property located on the south-west corner of SR94 and Steele Canyon Road known as 12863 Campo Road, Spring Valley, CA 91978 (referenced above). I learned about the public briefing from JAC, was not able to attend, and did not know that the referenced property might be impacted by this project. Neighbors that attended the meeting contacted me and mentioned that the referenced commercial property could possibly be impacted. Today was the first day that I located the EIR on the Cal Trans website.

In additional to agreeing with each and every one of the nineteen (19) comments by others listed below, I have three additional concerns.

UUUU 2

1. If any property is acquired from APN 596-040-69, parking spaces will be eliminated. The EIR acknowledges this on Table 2.1-2 with this statement; "Although parking spaces on the south side of SR-94 at the Steele Canyon Rd. intersection would be eliminated, sufficient parking would exist during and following construction."
   This statement is not true. The elimination of even one (1) parking space would invalidate the requirements set forth in a major use permit that allows the California Sol Restaurants to use its patio area. This patio area is for dining and other activities that are crucial to their operations.

UUUU 3

2. Figure 1-6 shows proposed grading areas. How will the proposed grading fill impact additional parking areas and the entrance to the businesses within the referenced property? Will these businesses be able to stay open during the construction? Will these businesses be accessible after the proposed construction? Will the access provided and new parking areas after construction be ADA compliant?

UUUU 4

3. Figure 1-6 shows proposed temporary easement areas which I assume will be used for construction activities and made unavailable to the adjacent businesses within the referenced property. The areas to the south of these businesses are septic leach fields and not available to vehicles. The areas to the east and west of these businesses are their respective parking areas, are needed during their hours of operation, and would require them to close if not available. How will these parking areas be available during and after construction if these are temporary easements? Will the parking that is available be ADA compliant?

Again I want to state that I agree with each and every one of the nineteen (19) comments below:

UUUU5
UUUU6
UUUU7

1. Material review period is insufficient time for public to review and provide comments.
2. July-August is vacation time for many who will not even see the EIR until too late.
3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.

RESPONSES

UUUU 1 Public noticing included publication of the notice in a newspaper of general circulation in the area affected by the Proposed Project, sent to the State Clearinghouse and posted on the Caltrans website, which is consistent with the requirements of CEQA. Your name has been included on the Distribution List (see Final EIR Chapter 8.0 Distribution List).

UUUU 2 Please see RTC EEE1, which notes that parking would be compliant with County of San Diego parking requirements. As such, available parking would have no effect on the "major use permit."

UUUU 3 All temporary and permanent parking configurations, including the pedestrian path to the existing building would need to meet current ADA standards. FEIR Section 2.3.3 Environmental Consequences: Construction Impacts notes that temporary construction displacement of parking would occur, and that the owner would be contacted to reconfigure and/or provide replacement parking. Also, please see RTC EEE1.

UUUU 4 Please see RTC EEE1 and UUUU3.

UUUU 5-23. Please see RTC TTTT1-19.

COMMENTS	RESPONSES
UUUU8 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.	
UUUU9 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)**	
UUUU10 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.	
UUUU11 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.**	
UUUU12 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.**	
UUUU13 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?	
UUUU14 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?	
11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?	
UUUU15 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94.** Why?	
UUUU16 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?	
UUUU17 14. **No mitigation of the impacts of IMPROPERLY PLACED TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?	
UUUU18 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?	
UUUU19 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.	
UUUU20 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**	
UUUU21 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**	
UUUU22 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?	
UUUU23 I, Rene L. Cardinale, want to go on record that I believe that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	

COMMENTS	RESPONSES
From: Stephen Corner **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Proposed Highway 94 "Improvement" Project Concerns **Date:** Thursday, August 27, 2015 5:15:39 PM To: Caltrans Officials We have been Jamul residents for many years and are greatly concerned for our future highway safety. Highway 94 is a two-lane highway that leads directly to Mexico. As a result, much of the traffic that passes through our town is made up of heavily-loaded trucks; foreign, unfamiliar drivers; Border Patrol activity, etc. During the years we have lived here, we have lost many friends and neighbors to deaths on this treacherous highway. For nearly 30 years, CALTRANS enforced the law and held all players to the same, strict rules. Because these rules were so stringent, some property owners were unable to develop their properties and some were forced into foreclosure. Our own Fire Department was not allowed to enter the highway on the blind curve in front of their building and forced to drive a long distance to enter from Melody Lane. We trusted CALTRANS was looking out for the safety of all town residents and highway 94 users and we respected and trusted CALTRANS for this enforcement of these stringent rules. VVVV1 Suddenly, after all these years, CALTRANS has buckled under "some pressure from someone". Who is that "someone" and why is this suddenly happening just since Penn National Gaming came aboard with the Jamul Indians? Is someone at CALTRANS accepting bribery from Penn National? It certainly seems so and it seems that it must be someone high up the chain who has authority to override existing rules and previous decisions. Regarding this new plan, we share the following concerns with others in our community: VVVV2 1. Material review period is insufficient time for public to review and provide comments. VVVV3 2. July-August is vacation time for many who will not even see the EIR until too late. VVVV4 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. VVVV5 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. VVVV6 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** VVVV7 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. VVVV8 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** VVVV9 8. **Caltrans has failed the public trust by allowing a private entity to begin**	VVVV1 The Final EIR evaluates the impacts of the proposed SR-94 Improvement Project, which includes improvements to intersections and an access road. Please see RTC B1. VVVV2-20 Please see RTC TTTT1-19.

COMMENTS	RESPONSES
VVVV9 cont	
construction without an encroachment permit and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.**	
VVVV10	9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?
VVVV11	10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?
VVVV12	11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?
VVVV13	12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94.** Why?
VVVV14	13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?
VVVV15	14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state.** Where is the justification?
VVVV16	15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?
VVVV17	16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.
VVVV18	17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**
VVVV19	18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**
VVVV20	19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?
VVVV21	I believe CALTRANS exists for the "safety" of highway users, is funded with our tax dollars, and should not be making exceptions to those standards to accommodate special interest groups. Please reinstate that previous responsibility and realize that nothing in this 800 plus page EIS even begins to mitigate problems and deaths that will certainly arise from this new traffic plan. Twice in the past months, traffic has been totally gridlocked for several hours in both directions on this two-lane highway.
	Sincerely, Helen and Stephen Comer 14904 Presilla Drive Jamul CA 91935
	VVVV 21 Please see RTC L1, B1, B2 and C1.

COMMENTS	RESPONSES
From: Stephanie Dillon **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** Comments for Proposed SR 94 Improvement Project **Date:** Wednesday, August 26, 2015 10:17:03 PM Dear Sir: To meet your deadline for comments on the above-referenced project, I submit the following: WWWW1 1. Material review period is insufficient time for public to review and provide comments. WWWW2 2. July-August is vacation time for many who will not even see the EIR until too late. WWWW3 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. WWWW4 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. WWWW5 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** WWWW6 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. WWWW7 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** WWWW8 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** WWWW9 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? WWWW10 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why? WWWW11 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why? WWWW12 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why? WWWW13 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why? WWWW14 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification? WWWW15 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why? WWWW16 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods. WWWW17 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF**	WWWW 1-19 Please see RTC TTTT1-19.

COMMENTS	RESPONSES
WWWW17 cont. **OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**	
WWWW18 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**	
WWWW19 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS' EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?	
WWWW20 In the past week we have had a fine example of what we can look forward to in Jamul. An accident at Honey Springs and the 94 caused traffic to be stopped in both directions for a number of hours, so that people were stranded during a heat wave with no space for emergency vehicles to enter the scene.	WWWW 20 Please see RTC LLL4.
WWWW21 Your agency has been spectacularly indifferent to the safety and welfare of our community and all of those to the east.	WWWW 21 The CEQA process that Caltrans has engaged in for the SR-94 Improvement Project including the public scoping process, project development team meetings, and consultation coordination (see Final EIR, Chapter 6.0), as well as the detailed Final EIR traffic analysis (see Final EIR, Section 2.4) reveals a commitment by Caltrans to present the facts associated with the project – the SR-94 Improvement Project.
WWWW22 I, Stephanie Dillon, want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	WWWW 22 Please see RTC UUU6.

COMMENTS	RESPONSES

From: JME
To: SR-94_SR_94_Draft_EIR@DOT
Subject: EIR Comments on Proposed Changes to the SR-94
Date: Thursday, August 27, 2015 2:22:47 PM

To Whom it may concern,

I am writing to voice my concern and COMPLETE OPPOSITION to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons:

XXXX1 1. Material review period is insufficient time for public to review and provide comments.

XXXX2 2. July-August is vacation time for many who will not even see the EIR until too late.

XXXX3 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.

XXXX4 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.

XXXX5 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car.**

XXXX6 6. **Caltrans has repeatedly failed to listen** to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.

XXXX7 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.**

XXXX8 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.**

XXXX9 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?

XXXX 1-19 Please see RTC TTTT1-19.

COMMENTS

XXXX10 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?

XXXX11 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?

XXXX12 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Mitigation must be Why?

XXXX13 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?

XXXX14 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?

XXXX15 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?

XXXX16 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.

XXXX17 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**

XXXX18 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**

XXXX19 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?

XXXX20 20. Impacts to waters of the state are glossed over with a mention there might be impacts. CALTRANS fails to address the need for resource agency permits such as 401 Water Quality Certification, 404 permits, ect. TThese types of permits general require mitigation. There is NO mitigation proposed for these impacts.

XXXX21 21. Land set aside for MSCP purposes should not be impacted by development. MSCP areas were set aside to offset enviromental impact, NOT to be a source to be impacted in the future. The cummulative impacts from all projects impacting MCSP areas must be addressed.

XXXX22 21. Very little mitigation is proposed for any impacts. **CALTRANS fails to provide viable mitigation for this project**, which under CEQA is required.

XXXX23 22. This report **piecemeals the project** to try to minimize the projects impacts, and evade meaningful mitigation. This avoids clearly identifying the cumulative effects on the surrounding environment and community, and is a violation of California

RESPONSES

XXXX 20 The Natural Environment Study prepared for this project (Natural Investigations Co., 2014) thoroughly documented water resources, and formal delineations of waters under State and federal jurisdiction in the project areas were performed; these delineations were approved by the U.S. Army Corps of Engineers (USACE) in 2012 and 2013. Table S-3 Permits and Approvals lists all the permits that are required for the SR-94 Improvement Project (including the Section 401 Permit). In October 2015, USACE issued a Section 404 Nationwide Permit and in December 2015, CDFW issues a Streambed Alteration Agreement to implement the Proposed Project and mitigation measures for work in protected channels. Various mitigation measures will be implemented to reduce impacts to waters of the State to a less-than-significant level (see Final EIR Section 2.17).

XXXX 21 The MSCP specifies that for any impacts to lands within existing preserve areas, the compensation ratio is doubled (see Final EIR Section 2.16). For example, if 1 acre of grassland within a property designated as Take Authorized, the compensation ratio (specified in the Biological Mitigation Ordinance) is 1:1 and the land preservation requirement would be 1 acre. If, for example, this 1 acre of grassland had a preserve designation, such as Hardline Preserve, then the compensation ratio would double (2:1) and the land preservation requirement would be 2 acres. Thus, the MSCP has already anticipated and analyzed development impacts to lands designated as preserve land, and has created a compensatory mitigation program for these impacts. This includes the mitigation of cumulative impacts of future development, which is the fundamental purpose for the creation of a habitat conservation plan. Note also that the preserve land offered as compensation is located on the 87-acre parcel, which consists of pristine coastal sage scrub habitat (ranked at the highest quality—Tier 1), while the preserve land proposed to be developed is either annual grassland habitat or ruderal/disturbed habitat (both ranked at the lowest qualities—Tier 3 and Tier 4, respectively.

COMMENTS

XXXX23 cont

environmenal laws.

XXXX24

23. CALTRANS has violated their own rules in the development of this project, violating the public trust in the agency and should be forced to stop this project.

XXXX25

I oppose the use of taxpayer dollars to support improvements to benefit one outside private interest -JIV. If it is not to support JIV why do the improvements stop there?

XXXX26

I want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.

RESPONSES

XXXX 22 Mitigation provided for the SR-94 Improvement Project is as required by CEQA law. Please see RTC UUU6.

XXXX 23 It appears that the commenter is referring to the JIV Gaming Development Project when he refers to piecemealing of the project. Please see RTC B1. The SR-94 Improvement Project Final EIR fully and completely evaluates the SR-94 Improvement Project.

XXXX 24 Caltrans has followed its rules and regulations for processing the SR-94 Improvement Project.

XXXX 25 The cost of the SR-94 Improvement Project will be covered by JIV, not the taxpayers as implied by the commenter.

XXXX 26 Please see RTC UUU6.

COMMENTS

From: norbero@cox.net
To: SR-94_SR_94_Draft_EIR@DOT
Subject: Fwd: "CALTRANS SR 94 IMPROVEMENT PROJECT"
Date: Thursday, August 27, 2015 6:20:11 PM

>
>
>
YYYY 1 > There are NO improvements east of the site.
> No analysis of improvements of alternate routes: Steele Canyon, Jamul Drive,
> Lyons Valley, Honey Springs, Skyline TT, Otay Lakes Rd etc.
>
>
>
YYYY 2 > CalTran's disregard for life and safety on SR-94 is unacceptable. Why did
> you not report today's fatal crash and impacts on 94 on their website. Above
> is the complete listing of 94 "Problem Areas" while 94 was closed in both
> directions and traffic was at a complete gridlock
>
>
>
> Proposed SR 94 Improvement Project
>
YYYY3 > 1. Material review period is insufficient time for public to review and
> provide comments.
YYYY4 > 2. July-August is vacation time for many who will not even see the EIR
> until too late.
YYYY5 > 3. EIR document is seriously flawed. It fails throughout to address the
> community and public's safety and welfare.
YYYY6 > 4. Caltrans has chosen to divide the mitigation process in CEQA by
> allowing a commercial enterprise to begin construction without proper
> environmental review and mitigation.
YYYY7 > 5. The public safety has been compromised by allowing the construction
> traffic to access the project site on SR 94 without prior mitigation. Over
> 300+ construction employee trips per day, twice a day; 50+ cement mixer
> trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery
> semi-trailer trucks per day, are using SR 94 without any mitigation except
> for a few signs, a single flagman and a CHP car (the patrolman has been
> visually seen playing on his cell phone and not watching the traffic.)
YYYY8 > 6. Caltrans has repeatedly failed to listen to the public and the
> community concerning their long term issues regarding the safety of SR 94, a
> Level F designated road, according to Caltrans own declarations.
YYYY9 > 7. Caltrans had promised the community, in-writing, that they would hold
> responsible ANY developer, to the rules and regulations of the State of
> California Highway Codes and Caltrans own rules and regulations, INCLUDING
> following CEQA. They have failed.
YYYY10 > 8. Caltrans has failed the public trust by allowing a private entity to
> begin construction without an encroachment permit and all the other rules
> and regulations they have REQUIRED on ALL OTHER DEVELOPERS along SR 94
> corridor.
YYYY11 > 9. Lack of addressing all the feeder streets along SR 94. Lack of
> addressing all the private driveways along SR 94. No mitigation proposed.
> Why?
YYYY12 > 10. Community and drivers of SR 94 have repeatedly asked Caltrans to

RESPONSES

YYYY 1 The objective of the Proposed Project is to implement traffic mitigation measures identified in the FTEE for the JIV Gaming Development Project. Such mitigation measures did not include traffic improvements on alternative routes or traffic improvements east of the site on SR-94. Please see RTC III1.

YYYY 2 The comment is directed at Caltrans' reporting of accidents, not at the adequacy of the Draft EIR.

YYYY 3-22 Please see RTC TTTT1-20.

COMMENTS	RESPONSES
YYYY12 cont.	
> address Otay Lakes Road access to SR 94. No mitigation proposed. Why?	
YYYY13	
> 11. Honey Springs Road access to SR 94 is not addressed. No mitigation	
> proposed. Why?	
YYYY14	
> 12. No mitigation proposed for impacts to Jamul Drive when traffic will	
> be forced to use the ONLY road west when SR 94 is shut down, either for	
> construction, or SIG alert on SR 94. Why?	
YYYY15	
> 13. No mitigation proposed for impacts to Steele Canyon Road and all	
> streets and driveways, when traffic will be forced to use the ONLY road west	
> when SR 94 is shut down, either for construction, or SIG alert on SR 94.	
> Why?	
YYYY16	
> 14. No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH	
> A SHORTER DISTANCE than Caltrans Regulations state. Where is the	
> justification?	
YYYY17	
> 15. No mitigation of how emergency services times will be mitigated by	
> the increased traffic impacts. Why?	
YYYY18	
> 16. No mitigation of the impacts on to deal with drive time impacts for	
> commercials enterprises from the US and Mexico who utilize SR 94 to move	
> goods.	
YYYY19	
> 17. NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR	
> CHILDREN AND PARENTS DRIVING TO SCHOOL.	
YYYY20	
> 18. Caltrans has failed to service the public trust by ALLOWING AN	
> EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL	
> ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.	
YYYY21	
> 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line	
> when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is	
> the JIV picking up the cost of another re-surfacing?	
YYYY22	
>	
>I, Dave Norberg want to go on record that the Caltrans CEQA is a flawed,	
> biased document and does not address all the mitigation needed and Caltrans	
> has failed the State of California taxpayers.	
>	
>	
>	
> Thank you for your time.	
>	
>	
> Dave>	
>	
>	
> <http://www.facebook.com/norberggroup> cid:image001.jpg@01CC1554.28550B40	
> <http://www.twitter.com/norberggroup> cid:image002.jpg@01CC1554.28550B40	
> <http://www.youtube.com/norberggroup> cid:image003.jpg@01CC1554.28550B40	
> <http://www.linkedin.com/pub/david-and-kim-norberg/8/9aa/909>	
> cid:image004.jpg@01CC1554.28550B40	
>	
>	
>	
>	
>	

COMMENTS	RESPONSES

From: Kim Norberg
To: SR-94_SR_94_Draft_EIR@DOT
Subject: "CALTRANS SR 94 IMPROVEMENT PROJECT"
Date: Thursday, August 27, 2015 6:16:33 PM

Problem Areas

ZZZZ1 There are NO improvements east of the site,
ZZZZ2 No analysis of improvements of alternate routes: Steele Canyon, Jamul Drive, Lyons Valley, Honey Springs, Skyline TT, Otay Lakes Rd etc.

ZZZZ3 CalTran's disregard for life and safety on SR-94 is unacceptable. Why did you not report today's fatal crash and impacts on 94 on their website. Above is the **complete** listing of 94 "Problem Areas" while 94 was closed in both directions and traffic was at a complete gridlock

Proposed SR 94 Improvement Project

ZZZZ4 1. Material review period is insufficient time for public to review and provide comments.
ZZZZ5 2. July-August is vacation time for many who will not even see the EIR until too late.
ZZZZ6 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare.
ZZZZ7 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation.
ZZZZ8 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)**
ZZZZ9 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations.
ZZZZ10 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.**
ZZZZ11 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.**

ZZZZ1 Please see RTC YYYY1.

ZZZZ2 Please see RTC YYYY1.

ZZZZ3 Please see RTC YYYY2.

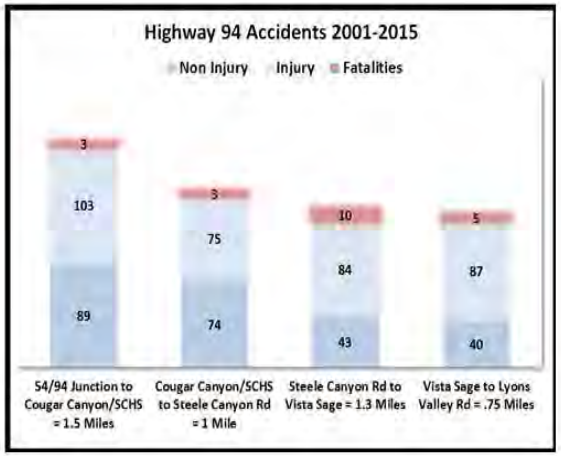
ZZZZ4-23 Please see RTC TTTT1-20.

COMMENTS	RESPONSES
ZZZZ12 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why?	
ZZZZ13 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address Otay Lakes Road access to SR 94. No mitigation proposed. Why?	
ZZZZ14 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?	
ZZZZ15 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why?	
ZZZZ16 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?	
ZZZZ17 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?	
ZZZZ18 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?	
ZZZZ19 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.	
ZZZZ20 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**	
ZZZZ21 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**	
ZZZZ22 19. Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?	
ZZZZ23 I, Kim Norberg want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	
Thank you for your time	
Kim Norberg	

COMMENTS	RESPONSES
From: Zay Venzor **To:** SR-94_SR_94_Draft_EIR@DOT **Subject:** SR-94 **Date:** Thursday, August 27, 2015 1:14:19 PM T o Whom it may concern, I am writing to voice my concern and COMPLETE opposition to your proposed changes to SR-94. Since you gave the community almost no time to consider any plans I have sent a list of just some of my reasons I oppose this project. AAAAA1 1. Material review period is insufficient time for public to review and provide comments. AAAAA2 2. July-August is vacation time for many who will not even see the EIR until too late. AAAAA3 3. EIR document is seriously flawed. It fails throughout to address the community and public's safety and welfare. AAAAA4 4. Caltrans has chosen to divide the mitigation process in CEQA by allowing a commercial enterprise to begin construction without proper environmental review and mitigation. AAAAA5 5. The public safety has been compromised by allowing the construction traffic to access the project site on SR 94 without prior mitigation. **Over 300+ construction employee trips per day, twice a day; 50+ cement mixer trucks per day; 50+ dirt dump trucks per day; 50+ construction delivery semi-trailer trucks per day, are using SR 94 without any mitigation except for a few signs, a single flagman and a CHP car (the patrolman has been visually seen playing on his cell phone and not watching the traffic.)** AAAAA6 6. Caltrans has repeatedly failed to listen to the public and the community concerning their long term issues regarding the safety of SR 94, a Level F designated road, according to Caltrans own declarations. AAAAA7 7. **Caltrans had promised the community, in-writing, that they would hold responsible ANY developer, to the rules and regulations of the State of California Highway Codes and Caltrans own rules and regulations, INCLUDING following CEQA. They have failed.** AAAAA8 8. **Caltrans has failed the public trust** by **allowing a private entity to begin construction without an encroachment permit** and all the other rules and regulations they have **REQUIRED on ALL OTHER DEVELOPERS along SR 94 corridor.** AAAAA9 9. Lack of addressing all the feeder streets along SR 94. Lack of addressing all the private driveways along SR 94. No mitigation proposed. Why? AAAAA10 10. Community and drivers of SR 94 have repeatedly asked Caltrans to address	AAAAA 1-20 Please see RTC TTTT1-20.

COMMENTS	RESPONSES
AAAAA10 cont Otay Lakes Road access to SR 94. No mitigation proposed. Why?	
AAAAA11 11. Honey Springs Road access to SR 94 is not addressed. No mitigation proposed. Why?	
AAAAA12 12. **No mitigation proposed for impacts to Jamul Drive when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94**. Why?	
AAAAA13 13. No mitigation proposed for impacts to Steele Canyon Road and all streets and driveways, when traffic will be forced to use the ONLY road west when SR 94 is shut down, either for construction, or SIG alert on SR 94. Why?	
AAAAA14 14. **No mitigation of the impacts of IMPROPERLY PLACES TRAFFIC LIGHTS WITH A SHORTER DISTANCE than Caltrans Regulations state**. Where is the justification?	
AAAAA15 15. No mitigation of how emergency services times will be mitigated by the increased traffic impacts. Why?	
AAAAA16 16. No mitigation of the impacts on to deal with drive time impacts for commercials enterprises from the US and Mexico who utilize SR 94 to move goods.	
AAAAA17 17. **NO MITIGATION OF THE IMPACTS WITH REGARDS TO THE SAFETY OF OUR CHILDREN AND PARENTS DRIVING TO SCHOOL.**	
AAAAA18 18. Caltrans has failed to service the public trust by **ALLOWING AN EXEMPTION TO SDG&E TO RUN NEW POWER SPECIFICALLY TO OPERATE A COMMERCIAL ENTERPRISE along SR 94 WITHOUT CEQA OR PROPER MITIGATION.**	
AAAAA19 19. **Caltrans is allowing SDG&E to tear up SR 94 for its new power line when SR 94 was just RE-SURFACED AT TAXPAYERS'S EXPENSE of $14 million. Is the JIV picking up the cost of another re-surfacing?**	
AAAAA20 I,_Zay Venzor and my children want to go on record that the Caltrans CEQA is a flawed, biased document and does not address all the mitigation needed and Caltrans has failed the State of California taxpayers.	
AAAAA21 Accident data for SR 94 from the 54/95 junction to Lyons Valley Road. Enough is Enough!! **No proposed mitigation for Steele Canyon High School / Cougar Canyon. WHY??!!**	AAAA 21 The FTEE prepared for the JIV Gaming Development Project identified the need for permanent improvements to the State Highway System. Therefore, subject to Caltrans oversight and independent review, JIV is responsible for the development of a CEQA Environmental Impact Report for the improvements within the State right-of-way and the necessary mitigation for any impacts to traffic on SR-94. Improvements at the intersection of Cougar Canyon Road and SR-94 were not included in the list of permanent improvements to the State Highway System under consideration for this Final EIR. Please see RTC L1.

COMMENTS



AAAAAA 22

This is the latest press release from Penn National. Who do you work for CALTRANS taxpayers or Casino's???
"Penn National, the Jamul Indian village and Caltrans have been working very closely on the impact studies and the resulting modifications to SR 94. They have a great plan, they have been terrific to work with and **Caltrans is excited to get started so that the improvements will be ready for the casino opening in mid-2016.**"

RESPONSES

AAAAA 22 The commenter apparently cites a portion of a Penn press release. The comment does not address the adequacy of the Draft EIR, which is the subject of this process.

COMMENTS	RESPONSES
EL CAJON, CALIFORNIA, STATE OF CALIFORNIA FOR THE COUNTY OF SAN DIEGO TAKEN ON: WEDNESDAY, AUGUST 5, 2015 TAKEN AT: 3121 WILLOW GLEN DRIVE EL CAJON, CALIFORNIA REPORTER: GLORIA D. MAZON. CSR NO. 9356	

COMMENTS	RESPONSES
23 24 25 1 1 CALTRANS PUBLIC HEARING, WEDNESDAY, AUGUST 5, 2015 2 THE PAVILLION ROOM 3 3121 WILLOW GLEN DRIVE, EL CAJON, CALIFORNIA 92019 4 5:00 p.m. - 8:00 p.m. 5 * * * 6 7 MS. STROUF: My name s Jean Strouf. BBBBB 1 — 8 Two comments. I read through the entire 650 9 pages and noticed that bicyclists, although mentioned, 10 were ignored in the entire improvement project. They 11 were disregarded. Let me put it strong, more strongly, 12 disregarded entirely. BBBBB 2 — 13 And the Otay Mesa Road, Otay Valley Road, I 14 forget which one. I forget what it's called right now, 15 but that was entirely disregarded and left out of 16 everything mentioned. The improvement project goes to 17 just before that intersection, that road is so narrow 18 that we're going to have two deaths a day easily from the 19 traffic and most of the traffic will come from that	BBBBB 1 Section 2.4 of the Final EIR includes a section of Pedestrian, Transit and Bike Facilities affected by the Proposed Project. The intersections and roadway improvements included in the Final EIR would be designed and implemented according to Chapter 1000 “Bikeway Planning and Design” of the Caltrans Highway Design Manual. These improvements w ould be designed and constructed in a manner consistent with the Design Information Bulleting (DIB) 82-05, with includes “Pedestrian Accessibility Guidelines for Highway Projects”. As part of the implementation of the proposed project, a Transportation Management Plan (TMP) would be prepared according to Caltrans’ Deputy Directive 60-R2 (DD-60-R2). The TMP would include specifications on how to provide traffic handling measures along the SR-94 corridor in order to maintain bicycle access. Section 2.4 of the Final EIR includes language on how existing bicycle lanes or bicycle facilities would be affected during construction. BBBBB 2 The Proposed Project will not increase traffic volumes or change the geometrics along the identified roadway. For that reason, the identified roadway was not included in Final EIR evaluation. The commenter is likely referring to the increased traffic resulting from the operation of the JIV gaming facility. The JIV gaming facility is not the Proposed Project. Please see RTC B1 and C1.

COMMENTS		RESPONSES
	20 direction, because Eastlake is right there.	
BBBBB 3	21 So those are my -- and Proctor Valley Road. 22 There was no mention of improving Proctor Valley Road, 23 and right now it's dirt washboard and the other half of 24 Eastlake will come from this; 80 percent of the casino 25 traffic will come from Eastlake and Chula Vista; every	BBBBB 3 The Proposed Project will not increase traffic volumes or change the geometrics along the identified roadway. For that reason, the identified roadway was not included in Final EIR evaluation. The commenter references "casino traffic" resulting from the operation of the JIV gaming facility. The JIV gaming facility is not the Proposed Project. Please see RTC B1 and RTC C1.
	2	
	1 other area is served by other casinos. 2 So that's my comments. I read them. I am 3 giving a letter -- probably I should give it to you, if 4 you want.	
	5	
	6 MS. VIA: My name is Connie Via. 7 I live on Vista Sage Lane in Jamul. I will be 8 impacted by this casino if in fact it is completed and it 9 is approved.	
BBBBB 4	10 At this point, I do know that the Jamul Indian 11 Village is not a reservation, therefore they have no 12 right to have built this structure and intimidated the 13 entire community by this atrocity.	BBBBB 4 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response. Nevertheless, Caltrans notes that JIV is a federally recognized Indian tribal government. 79 Fed. Reg. 4748-02, 4750 (January 29, 2014)(Department of the Interior's statutorily-mandated listing of "Indian Entities Recognized and Eligible To Receive Services From The United States Bureau of Indian Affairs").
BBBBB 5	14 There's been a lot of -- it appears collusion 15 with Caltrans because the road was completed not too long 16 ago, now they've got all these ideas about widening it, 17 changing lanes, putting up signs to allow for the 9000 or 18 whatever, additional cars that would be driving to this	BBBBB 5 Please see RTC B1 and C1.

COMMENTS		RESPONSES
	19 casino.	
BBBBB 6	20 The community -- I think there's 99 percent of 21 us which are opposed to this building of a Casino for 22 gambling. This case is now in Federal Court and we're 23 hoping, and pretty much assured, that the casino will not 24 go through and therefore all of this work will have been 25 for nothing, and all the disruption and the desecration	BBBBB 6 Please see RTC B1 and C1.
	3	
	1 of the grave sites and the getting rid of the Jamul 2 Indians that did live on this land and were indians, had 3 to leave their property. 4 So there's been a lot of wrongs done, not only 5 to the community but to the few Jamul Indians themselves, 6 which I think is really a disgrace. 7 So I'm hoping that the Federal Judges that are 8 overseeing these cases, will do the right thing as they 9 have in previous cases where similar activity has 10 occurred and stop this once and for all. Twenty years is 11 much-too-much. 12 No casino in Jamul. Not now, not ever!	
	13	
	14 MS. MAY: My name is Marcy May. I live on 15 Whispering Meadows Lane in Jamul, next to the Bureau of 16 Land Management.	BBBBB 7 Please see RTC B1 and C1. .
BBBBB 7	17 I have lived there since 1998 and I am	

COMMENTS		RESPONSES
BBBBB 7 cont	18 concerned about the new -- how do I say this? What's 19 going on the, on the freeway. There seems to be a need 20 for a traffic light at Vista Sage and a traffic light at 21 Otay Lakes and I read the report and that has been 22 ignored. There are several accidents at both locations 23 and due to the casino being opened, a lot of traffic is 24 going to come from Otay Lakes. It's a blind corner and 25 there's just too many accidents there already, so you 4 1 can't see it to get onto 94 from Otay Lakes. It's very 2 dangerous.	
BBBBB 8	3 The other area that needs, I think it needs a 4 traffic light for sure, because Vista Sage people try to 5 turn left there, and you can't do it safely without a 6 light. You'd really have to be safe, you need to turn 7 right and go to the corner and turn around and come back, 8 and that probably was fine when we had less traffic but 9 now we have 3000 more cars on the road per day, that 10 would be a problem. The road needs to be widened. There 11 needs to be a center divide, something like a cement 12 center divide and the road needs to be widened at Steele 13 Canyon. I think they have the other plans. I don't know 14 how it's going to be with the school traffic. It's 15 pretty horrendous, so that's it. 16	BBBBB 8 Please see RTC B1 and C1.

COMMENTS	RESPONSES
17 MR. Fair: My name is William Fair and I live 18 on Proctor Valley Road and I've lived, I have lived in 19 Jamul. My family has for over 40 years. I'm well aware 20 of this highway and how inadequate it is. I'm also aware 21 of many deaths to my neighbors and friends. 22 There's a traffic hazard about to occur and 23 with Caltrans permission, and I want to know who is 24 personally going to take responsibility for the deaths 25 that occur over this? I think it's sad that they would 5 BBBBB 9 1 even consider this type of access onto this road. I fear 2 for my neighbors and friends and my family of what's 3 going to come next and I would just hope that we will all 4 make it through this. 5 And I hope Caltrans would do their job and not 6 allow access onto this very dangerous section of road, 7 probably one of the worst; thank you.	BBBBB 9 Please see RTC B1 and C1.
8 9 10 MR. PARLETTE: My name is Lew Parlette. 11 I've been a Jamul resident for 31 years, with 12 my wife Lori and we've been against the casino being, you 13 know, we're against the casino obviously, as a Jamul BBBBB 10 14 resident, as our neighbors of the residents. 15 And my concern is, that there's been some Quid	BBBBB 10 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response.

COMMENTS		RESPONSES
BBBBB 10 cont	16 pro quo, somebody has gotten paid off in the 17 bureaucracies, for this thing to have gone the way it has 18 in the face of so much community opposition, and I hope 19 it doesn't turn out some time down the line where we find 20 out that serious money has changed hands in an awful 21 manner; that's kind of my thinking that way; it happens. 22 These sort of things happen in politics and so 23 that's my concern. So that's kind of what I'm thinking. 24 There's something fishy here; you might even put 25 "something fishy going on." I don't know, that might be 6 1 a little extreme, because this outfit from the East Coast 2 has no interest whatsoever in our national habitat. It's 3 all about the money, and that seems to be the name of the 4 game in these days; that's about it.	
BBBBB 11	5 It's the environment has been degraded by this 6 process, will have been degraded when this casino goes 7 in, along with all the other negative impacts; that's it.	BBBBB 11 Please see RTC B1 and C1.
	8 9 MS. HAMILTON: My name is Kimberly Hamilton. 10 I am the Co-President of the Deerhorn Valley 11 Community Association in Jamul, California and I'm here 12 representing that organization and we are in the eastern 13 portion of Jamul and very affected by this casino, excuse 14 me, by the road mitigation that are enabling the casino	

COMMENTS	RESPONSES
15 but we see no addressing of our traffic and safety 16 concerns at all once they move east of the casino site, 17 so I'm going to read from our comments that were passed 18 by our Board and our Steering Committee earlier this 19 morning. 20 "The Deerhorn Valley community Association has 21 determined that the proposed mitigations for State Route 22 94 to facilitate anticipated casino traffic, including 23 cars, buses and trucks is far short of what is needed. 24 Currently State Route 94 is a substandard road with a 25 high crash injury and fatality rate. These measures will 7 1 result in an even more dangerous road for local residents 2 and travelers alike.	
BBBBB 12 — 3 Issue 1: There was no assessment of State 4 Route 94 east of the casino construction site. Why was 5 no analysis provided of the impacts of car, bus and truck 6 traffic to SR 94 east of the casino construction? 7 Please explain why this eastern section is not 8 the perferred route between Pio Pico, Eastlake, South Bay 9 and Mexico and the proposed casino.	BBBBB 12 The footprint of the roadway and intersection improvements evaluated in the Final EIR does not include the area east of Reservation Road, with the exception of a portion of SR-94 for approximately 1,000 feet, that is included within the access alternative improvements. Also, please see RTC C1 and C4.
BBBBB 13 — 10 Where is the analysis of current conditions 11 versus future conditions with or without a casino?	BBBBB 13 Section 2.4 Traffic and Transportation/Pedestrian and Bicycle Facilities, includes and evaluation of traffic operations along the corridor for current and future conditions with and without the Casino traffic.
BBBBB 14 — 12 Paragraph 1-A: "Shoulderless road section." 13 The stretch of State Route 94 through the	BBBBB 14 Thank you for your comment.

COMMENTS		RESPONSES
	14 Rancho Jamul Ecological Reserve, is shoulderless and 15 narrow. Although it is one of the very few straight 16 sections.	
BBBBB 15	17 There have been numerous head-on crashes here 18 at high speeds, although passing is now illegal, it is 19 done frequently because this is one of the few sections 20 of State Route 94 with line of sight visibility of 21 oncoming cars.	BBBBB 15 Thank you for your comment. BBBBB 16 Please see RTC B1 and C1.
BBBBB 16	22 How many additional crashes, injuries and 23 fatalities are anticipated? What other impacts to this 24 section are anticipated by the thousands, the additional 25 thousands of vehicle trips, including cars, buses and 8 1 service trucks?	
BBBBB 17	2 Section 1-B: "Blocked access during 3 emergencies." 4 When crashes happen along the Rancho Jamul 5 Ecological Reserve section, State Route 94 shuts down, 6 typically in both directions due to the narrowness of the 7 roadway and the lack of shoulders. Many times emergency 8 vehicles have been stuck in the traffic backup attempting 9 to reach the site from an accident, they either wait for 10 clearance or reverse direction and use the long alternate 11 to Otay Lakes road in Chula Vista, Eastlake. This adds 12 as much as 45 minutes or more to the emergency response	BBBBB 17 In the unfortunate event of a road closure along SR-94, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions as to how to safely manage the street network. These events occur randomly and under different circumstances. Each situation is handled differently using the judgment of trained traffic control officers. When an emergency occurs, vehicular traffic is required to move to the shoulder and allow emergency vehicles to pass. The improvements included in this Final EIR would provide standard 8-foot shoulders within the footprint of the improvements and additional lanes that would provide more space for vehicles to move to the side, allowing emergency vehicles to travel along SR-94. In addition, emergency vehicle prehemption equipment would be installed at all signalized intersections within the project footprint.

COMMENTS	RESPONSES
13 times. 14 Here is one example from the CHP incident 15 report where a tow truck was unable to access the 16 accident site because it was stuck in traffic. "CHP 17 Incident Report 00183."	
BBBBB 18 18 Issue 2: "Failure to address impacts to Otay 19 Lakes Road." 20 Section 2-A: There was no assessment of why -- 21 excuse me, let me backup. 22 Why was no assessment done on the impacts to 23 Otay Lakes Road and especially the intersection of Otay 24 Lakes road and State Route 94? 25 This is the preferred route from South Bay and	BBBBB 18 The footprint of the roadway and intersection improvements evaluated in the Final EIR does not include the area east of Reservation Road, with the exception of a portion of SR-94 for approximately 1,000 feet, that is included within the access alternative improvements. Also, please see RTC C1.
9 1 Tijuana to Jamul. It is shorter and more direct than the 2 route via Jamacha Junction (State Route 54 and State 3 Route 94.) 4 Otay Lakes is a dangerous, narrow twisting 5 unlit road with non standard lane and shoulderless.	
BBBBB 19 6 Section 2-B: "Additional fatalities and 7 crashes at Otay Lakes Road to State Route 94." 8 How many additional serious crashes, injuries 9 and fatalities are anticipated at the intersection of 10 Otay Lakes Road and State Route 94, due to the increase	BBBBB 19 Please see RTC B1 and C1.

COMMENTS	RESPONSES
in traffic from Eastlake, South Bay and Tijuana? Please include the methodology for your analysis. Currently 600 additional homes are planned along Otay Lakes Road.	
BBBBB 20 Section 2-C: At the State Route 94 intersection visibility to the east while turning left from Otay Lakes Road is blocked due to the hillside that encroaches up to the roadway. The addition of casino traffic will make this left turn highly dangerous due to the oncoming traffic traveling at high speed (55 miles per hour) and this blind corner.	BBBBB 20 Please see RTC B1 and C1.
BBBBB 21 Section 3: There is no assessment of alternate roads -- excuse me, alternate routes -- let's backup. There is no assessment of the impacts to alternate routes from the east. The following roads are	BBBBB 21 Please see RTC B1 and C1.

BBBBB 21

1 already seeing greatly increased traffic attempting to
2 avoid the flagging operations at the casino construction
3 site.
4 Honey Springs Road (7.6 miles.)
5 Skyline Drive (7.1 mile)
6 Lyons Valley Road (1.6 miles)
7 Jamul Drive (5.3 miles)
8 Why has no analysis or assessment been made of

COMMENTS	RESPONSES
9 these alternate routes?	
BBBBB 22 — 10 With the impacts of casino construction, these 11 routes have already seen a large increase in traffic 12 especially during morning and evening commute times, but 13 also during the days when they are used to avoid being 14 stopped by the flagging operation at casino construction 15 site.	BBBBB 22 Please see RTC B1 and C1.
BBBBB 23 — 16 How many more cars are currently using these 17 routes versus pre-construction data? 18 What additional increase in traffic is 19 projected if the casino becomes operational? Please 20 compare to pre-construction.	BBBBB 23 Please see RTC B1 and C1.
BBBBB 24 — 21 What measures will be in place to divert bus 22 and truck traffic from using these two-lane railroads and 23 impacting residents along all 25-plus miles of alternate 24 roadway?	BBBBB 24 Please see RTC B1 and C1.
BBBBB 25 — 25 These alternate routes include significant up-	BBBBB 25 Please see RTC B1 and C1.
11	
1 and-down grades. How will safety be impacted by the 2 additional traffic in these areas?	
3 And second to the last.	
BBBBB 26 — 4 Issue 4: Impacts on emergency response times 5 and wildfire evacuation via State Route 94. 6 State Route 94 is the only accessible 7 evacuation route for residents in the event of wildfire.	BBBBB 26 Please see RTC B1 and C1.

	COMMENTS	RESPONSES
BBBBB 26 cont.	8 Since the installation of the San Diego -- of the SDG&E 9 power lane transmission lines, residents of Jamul and 10 Dulzura are now labeled as quote, "assets at highest risk 11 of catastrophic wild fire." 12 Any attempt to accommodate more traffic on the 13 already substandard evacuation route will pose huge risks 14 to residents of these vulnerable communities. 15 Australia suffered its own black Sunday when 16 evacuees were unable to navigate narrow roads, clogged 17 with collisions and disabled vehicles. Nearly 200 people 18 died. Most were found inside cars attempting to flee. 19 CAL FIRE warns us to prepare for exactly this kind of 20 wind-driven fire. They tell us it is a matter of "when" 21 not "if." Caltrans must not contribute to what is 22 already a very dangerous evacuation scenario by further 23 degrading road access and mobility. 24 Referencing a map from San Diego Gas and 25 Electric's final EIR, shows how wildfires is projected to 12 1 spread during extreme conditions; extreme conditions 2 occurring yearly, usually more than once. This is not a 3 rare event. 4 Purple sploshes on the map inside the red area 5 show assets at risk. These are homes at the highest risk 6 of loss and wildfire. The map shows the expected fire	

COMMENTS	RESPONSES
BBBBB 26 cont.	7 behavior in these conditions and is expected to become 8 more frequent in future use. All of the Deerhorn Valley 9 Community lies within this area, and the only evacuation 10 route westbound is State Route 94. 11 Caltrans must not accommodate mega casinos or 12 any projects that block the primary evacuation route at 13 State Route 94. To do so is to increase the risk of many 14 citizens not surviving the next fire, because the narrow 15 two-lane highway is blocked by casino patrons attempting 16 to flee, or cars disabled are blocking the road. 17 Wildfires happen at all hours of the day and 18 this casino plans to operate 24/7 also, and thereby 19 impact the roads 24/7. 20 Questions: What potential and additional 21 dangers will your mitigation measures pose during 22 wildfire emergencies and emergency response times when 23 State Route 94 is closed or blocked by crashes? 24 What impacts face residents? What impacts will 25 the casino patrons face?
	13
BBBBB 27	1 And the last section, (5): 2 Where is the explanation of the change in 3 Caltrans' previous determination that these impacts on 4 State Route 94 were unmitigable? Please explain the 5 events reversed in the previous Caltrans determination
BBBBB 27	In a January 17, 2007 letter to the JIV, Caltrans did cite a preference for access via Melody Road based on the JIV's project plans at that time. Caltrans has asked that all reasonable alternatives be studied to compare differing impacts to SR-94. The alternatives currently being studied include: access at Melody Road, access via the four acre parcel north of Reservation Road, and access via Reservation Road.

COMMENTS

that casino access to 94 was unmitigable? What has changed that led to this latest determination that mitigation could be done? This lack of organizational transparency has led to the further demise of community trust in your public agency; consider safety first.

Your Caltrans mission statement says: "Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."

These comments were approved by the Board of the Deerhorn Valley Community Association and its Steering Committee, on August the 5th of 2015.

The end.

MR HARRELSON: My name is Michael Harrelson. I live at 13789 Calle Del Sol in Jamul 91935, and my phone number is 619.820.2886 and I am the President of the "Vista Diego Property Owners Association," 62 properties on the Vista Diego Calle Del Sol private road that intersects Highway 94, about 40 yards west of the

intersection of Lyons Valley Road and Highway 94.

BBBBB 28

The home owners in my Association have asked me to share that a -- right now at this moment, it is a

RESPONSES

BBBBB 28 The installation of the traffic signal at the intersection of Lyons Valley Road and SR-94 was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. Required stopping sight distance is one of the standards evaluted during the design and construction of the traffic signal. The design speed for SR-94 is 55 miles per hour. Per Caltrans Highway Design Manual, the minimum stopping sight distance for travel speeds of 55 miles per hour is 500 feet. The proposed new traffic signal would be designed to accommodate 500 feet of stopping sight distance. The stopping sight distance is important for situations in which vehicles are stopping along SR-94 attempting to make a left-turn movement. The required 500 feet of stopping sight distance would also be provided at the Vista Diego Road driveway.

Another important design factor to consider is the corner sight distance. Per the Caltrans Highway Design Manual, the minimum corner sight distance for a design speed of 55 miles per hour is 605 feet. Vehicles entering SR-94 from Vista Diego Road have in excess of 605 feet of unobstructed sight distance.

In addition, the installation of the traffic signal at the intersection of Lyons Valley Road would create breaks in traffic by stopping vehicles traveling along SR-94. These stops in traffic would create gaps that would facilitate vehicles entering SR-94 from Vista Diego Road.

Furthermore, the installation of the traffic signal would allow vehicles traveling in the eastbound direction to make either a U-turn at the intersection of Lyons Valley Road to then travel westbound toward Vista Diego Road or for them to turn right onto Indians Spring Drive to then turn left from Indians Spring Drive toward Vista Diego Road.

COMMENTS	RESPONSES
BBBBB 28 cont.	

4 difficult and dangerous exit for us to make a left-hand
5 turn on Highway 94 heading east is very dangerous, cars
6 behind us don't want to stop till we make an illegal pass
7 around the right. The car behind this doesn't see us and
8 we've had dozens of accidents where cars rear-end. The
9 second car through will rear-end, because we're waiting
10 to make a left-hand turn. We encourage our family and
11 friends to go farther up, make a right-hand turn and come
12 back but that's cumbersome and people don't do it.
13 Propane companies, trash trucks, contractors,
14 don't know about that and they all will stop and make a
15 left-hand turn and with any luck, traffic will back up if
16 traffic tries to continue to get around. It creates a
17 very dangerous situation.
18 Ever since the traffic on Highway 94 has
19 increased because of the trucks from Mexico and the
20 number of houses that have been built on beyond us,
21 traffic on Highway 94 going west has been very heavy and
22 so, you have to wait until just the right moment to go
23 out and often that is not enough of a window to keep the
24 car behind you from having enough room to catch up to
25 you, so it's dangerous going in. It's dangerous coming

1 out.

COMMENTS		RESPONSES
BBBBB 29	2 If a traffic signal is put at the intersection 3 of Highway 94 and Lyons Valley Road, it will be only 40 4 yards from the only egress for over 100 people, the 62 5 families that live up here. It will only take six or 6 seven cars to backup going east and I will no longer be 7 able to make a left-hand turn so my Post Office, my 8 Veterinarian, my hardware store, the gas station will be 9 completely blocked off to me and I will have to make a 10 right-hand turn and go 10 miles out of my way to take the 11 back road which is Jamul Drive.	BBBBB 29 The installation of the traffic signal at the intersection of Lyons Valley Road and SR-94 was evaluated and included in the Final EIR. This signalized intersection would be designed and installed to meet all design criteria included in the Caltrans Highway Design Manual. A queuing evaluation was done for this intersection to account for future traffic operations when the traffic signal is installed. The queuing evaluation was completed with the traffic associated with the future JIV gaming facility added to the existing peak-hour turning movement counts conducted for the preparation of the traffic impact study for the project. The queuing evaluation demostrated that during the highest peak-hour of the day (afternoon peak-hour for the eastbound movement), the maximum anticipated queue length would be equal to 400 feet in length. The existing distance between the intersection of Vista Diego Road and SR-94 and the intersection of Lyons Valley Road and SR-94 is over 450 feet. Therefore, even at worse peak-hour conditions, the maximum anticipated queues along SR-94 in the eastbound direction would not exceed the available storage capacity between Vista Diego Road and Lyons Valley Road.
BBBBB 30	12 And if the casino is built, Jamul Drive will 13 become very impacted with traffic and so, that will be 14 impossible. All of the commercial ventures, the Catholic 15 Church, people will not be able to really access. If 16 they build the light, the traffic going westbound will 17 stop when the light is red, but all of the traffic at 18 Lyons Valley Road which backs up now, 10-and-12 cars at 19 the stop sign, will take that as an opportunity to make a 20 right-hand turn and they will suddenly clog up the lane 21 and block my way of getting out and as soon as the light 22 turns green, then those cars waiting on Highway 94 will 23 come in behind them. I am going to have a solid row of 24 cars.	BBBBB 30 Please see RTC B1 and C1.
BBBBB 31	25 If the casino traffic increases, it will be	BBBBB 31 Please see RTC BBBBB28 and 29.

COMMENTS		RESPONSES	
	1 worse, but if they just put in the light and there is no 2 casino, it will be worse. I'll have a solid line of cars 3 going west blocking my traffic east and a solid line of 4 cars going west blocking my way in-and-out. I have no 5 idea how we're going to get in-and-out of our only road. 6 There is no other outlet for that road.		
BBBBB 32	7 Right now, it's hard enough to sell homes in 8 Jamul. Anybody coming to look at your house for sale who 9 can't get to your property because of the traffic will 10 not buy your house, so they are going to not only destroy 11 our way of life because we can't get in-and-out, they're 12 going to destroy our primary asset, our homes.	BBBBB 32	Please see RTC B1 and C1.
BBBBB 33	13 And I've heard the explanation that traffic 14 creates periods of congestion followed by a break where 15 you can get in-and-out, that is not true. If it does 16 create a break, it will be a half mile down the road once 17 the traffic comes to accordion and expands its way out, 18 so that there are more openings, but right in front of my 19 house, it's going to be solid all the time.	BBBBB 33	Please see RTC BBBBB28 and 29.
BBBBB 34	20 And I've tried to express this. I've asked for 21 a visit, so to date nobody has. I've asked for them to 22 call me. I represent 62 families. My phone number is 23 in the record. I've asked to please come. All they have 24 to do is stand at the end of the road with me, to see how 25 difficult it is going to be if they put a light in there.	BBBBB 34	Please see RTC BBBBB28 and 29.

COMMENTS		RESPONSES
	17	
BBBBB 35	1 One mitigation could be a left-hand turn, but 2 we've been told Caltrans will not do that and I do not 3 see that on any map here, so a no left-hand turn lane 4 and a light is not only going to be difficult, it's going 5 to kill somebody.	BBBBB 35 Please see RTC BBBBB28 and 29.
BBBBB 36	6 And so I would very, very much like to register 7 my concerns, my complaints and ask that the Traffic 8 Engineer contact me and he has promised to do so, so that 9 he and I can see what's going to happen if they put a 10 light; put the light there. It's one of the five they've 11 planned on putting in. It's first one traveling east, 12 and for me it's the most troublesome and it's going to -- 13 I don't know. If you're a Catholic, I don't know how 14 you're going to get to church because the Catholic church 15 is right on the avenue.	BBBBB 36 Please see RTC BBBBB28 and 29.
	16 Thank you very much for your time. 17 18 MR. MARZEC: My name is Richard Marzec and I 19 live at Proctor Valley estates, Jamul, California.	
BBBBB 37	20 I believe that all of these improvement plans 21 are inadequate to handle the volume of traffic that is 22 currently in place and certainly within 9000, or more 23 than 9000 cars go onto the roadway with this project. I 24 don't believe that it addresses these improvement	BBBBB 37 Please see RTC C1.

COMMENTS		RESPONSES
	25 proposals address all of the issues at hand. I'm basing	
	18	
	1 that opinion on over 21 years of being a law enforcement	
	2 officer in San Diego County, during that time I worked	
	3 around Viejas, La Posta, Golden Acorn and Sycuan Casinos.	
	4 I've seen with the traffic volume what those projects	
	5 have done and the majority of those are right next to	
	6 Interstate 8.	
BBBBB 38	7 I don't believe that widening a few lanes,	BBBBB 38 Thank you for your comment. Please see RTC C1.
	8 adding signals and adding turn lanes are going to	
	9 properly handle that amount of traffic put onto a roadway	
	10 system that is already inadequate for the volume that is	
	11 there.	
BBBBB 39	12 In addition to the volume during their regular	BBBBB 39 Please see RTC B1 and C1.
	13 operations, I'm concerned about any kind of emergency	
	14 response. It has to go on from there. I've lived in	
	15 Jamul during the 2003 fire and 2007 fires and I've seen	
	16 what happens when large volumes of people attempt to	
	17 evacuate and I've seen what happens when a large number	
	18 of emergency vehicles are trying to get into managing	
	19 those evacuations and things like that, to have that many	
	20 cars in one condensed location like that, dumping all	
	21 onto and already a substandard roadway is just asking for	
	22 a disaster.	

COMMENTS		RESPONSES
BBBBB 40	23 I believe that this type of commercial 24 development in a rural area, the urban wildland and 25 interface is also going to also increase the fire 19 1 activity and the wildland fire in that area, because 2 quite honestly, a lot of gamblers are smokers. I've seen 3 it. I've seen it in the other casinos around in San 4 Diego County.	BBBBB 40 Please see RTC B1 and C1.
BBBBB 41	5 In particular, some of the proposals that are 6 not really addressed in the Caltrans plans here today 7 that really concern me, is Proctor Valley Road, to say 8 that Proctor Valley Road is not going to see any 9 increase in traffic is ridiculous. There's already a lot 10 of cars on that road and it's a dirt road and it's just 11 ridiculous to think that there's not going to be any 12 effect on the flow of traffic with this project and it's 13 not addressed by Caltrans here today. It has to be 14 addressed.	BBBBB 41 The Proposed Project consists of transportation improvements and will not adversely affect Proctor Valley Road. Please see RTC B1 and C1.
BBBBB 42	15 Another one is the intersection of the Otay 16 Lakes Road and Highway 94, to think that there's going to 17 be traffic coming up from South Bay that's going to come 18 to a stop sign at a T-intersection and turn into traffic 19 on Highway 94 is absurd, ridiculous. It's going to cost 20 people their lives. That intersection already has seen 21 numerous fatalities, fatal accidents and this is with the	BBBBB 42 Please see RTC B1 and C1.

COMMENTS		RESPONSES
	22 projected volume of traffic that has to be addressed, 23 with this level of development in that area.	
BBBBB 43	24 The entire corridor of Highway 94 from the 25 proposed project and that 9000ish cars to Tecate, Mexico 20 1 has to be addressed because that's another one. There's 2 a huge draw of casino patrons that come up from Mexico, 3 not only patrons but employees, and that's going to 4 increase the traffic over there and I don't see anything 5 here that's going to address any of those issues.	BBBBB 43 Please see RTC B1 and C1.
BBBBB 44	6 Another issue that I'm concerned about, is 7 there's no mitigation for the roads off of Highway 94. 8 The thought process is, it looks like from these 9 proposals, is that all the traffic will just take Highway 10 94, while living in Proctor Valley Estates and one of the 11 proposed entrances being on Melody Road dumps right into 12 a residential neighborhood, so that volume of cars 13 potentially is going to go right onto residential 14 streets, that's absolutely absurd.	BBBBB 44 Please see RTC B1 and C1.
BBBBB 45	15 So I don't believe any of the proposals have 16 properly addressed the volume of traffic that is 17 projected. I don't believe any of the projects that are 18 being proposed will do anything, other than increase the 19 danger level for people and first responders in the Jamul	BBBBB 45 In the unfortunate event of a road closure along SR-94, the California Highway Patrol or Sheriff Deputies would take control of the roadways and make decisions as to how to safely manage the street network. These events occur randomly and under different circumstances. Each situation is handled differently using the judgment of trained traffic control officers. When an emergency occurs, vehicular traffic is required to move to the shoulder and allow emergency vehicles to pass. The improvements included in this Final EIR would provide standard 8-foot shoulders within the footprint of the improvements and additional lanes that would provide more space for vehicles to move to the side, allowing emergency vehicles to travel along SR-94. In addition, emergency vehicle prehemption equipment would be installed at all signalized intersections within the Project footprint.

COMMENTS	RESPONSES
20 area. 21 22 MS. WERMERS: My name is Deborah Wermers. 23 My concerns are -- I don't want to use the word 24 "due process --" Jamul does not want the casino. Jamul 25 does not want road improvements. We don't want it on non	BBBBB 46 Please see RTC BBBBB5. The Proposed Project is a specific series of traffic improvemetns that will ameliorate traffic impacts and improve traffic movement in the event of an wildfire evacuation.
21 1 Indian land and we feel Caltrans is not listening to us, 2 doesn't care what we think and every other developer is 3 dragged through Caltrans bureaucracy to get one house, 4 two houses built, because I'm a developer. I build.	BBBBB 47 Please see RTC B1 and C1.
5 And how are they doing this, 6000, 8000 cars a 6 day on a rural highway?	BBBBB 48 Please see RTC B1 and C1.
7 And when I asked a Caltrans representative, 8 whose name I can't tell you right now, what they were 9 doing about Vista Sage, the most dangerous stretch in my 10 opinion where most of the kids and people died, they said 11 they didn't address it. 12 I said, "Do you know how many people died in 13 that quarter-mile stretch?" They said they had no 14 numbers. 15 In the last 15 years, there's been so many 16 fatalities there. 17 And that's it. I want to stay living rural.	Improvements at the intersection of Vista Sage and SR-94 were not included within the project description or evaluated under this Final EIR, since improvements to this intersection were not included as part of the improvements derived from the analysis included in the Final Tribal Enviromental Evaluation prepared for the JIV gaming facility (Final TEE, 2013), as mitigation measures for the JIV Gaming project's direct traffic related impacts.

COMMENTS		RESPONSES
	18	
	19 MR. DANA: My name is Dana.	
	20 I just have a series of questions.	
BBBBB 49	21 First one would be: Why did Caltrans allow	
	22 construction to begin before all mitigation measures were	
	23 in place?	
	24 Why the rush for TMP when no mitigation had	BBBBB 49 Please see RTC C6.
	25 been implemented? Sixteen hundred million dollar	
	22	
	1 reasons. Caltrans brought this mess on itself, (Jamul)	
	2 by allowing access to a site and construction before	BBBBB 50 Please see RTC B1 and C1.
	3 mitigation.	
	4 Now it appears the casino will open before the	
	5 mitigation is complete and citizens of Jamul will suffer.	
	6 Who at Caltrans is responsible?	
BBBBB 50	7 Next question: Who at Caltrans made the	BBBBB 51 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response. However, Caltrans nevertheless notes that the cost of the implementation of roadway improvements varies signficantly due to several factors like needed right of way aquisition, utility relocations, need for structural replacement or installation, needed grading, etc.
	8 determination that these are JIV Tribal lands eligible	
	9 for a casino project? Seems it still needs to be settled	
	10 in court. If JIV loses, will anyone at Caltrans be held	
	11 responsible? Of course not.	
BBBBB 51	12 Next question: How much road does 16 million	BBBBB 52 Please see RTC B1 and C1.
	13 dollars buy?	
BBBBB 52	14 Next question: Since Caltrans allowed	
	15 construction to proceed without CEQA review, it	
	16 effectively took the no-project alternative off the table	

17 which would have required mitigation. Now says, the only
18 alternatives are how much mitigation will 16 million
19 dollars buy? It doesn't appear to be very much.

BBBBB 53

20 Next question: The IR speaks of applying for
21 approval from, among others, County Government, since the
22 County is party to a lawsuit against Caltrans, it's safe
23 to assume they didn't give approval and that didn't
24 matter as much as 16 million dollars.

BBBBB 54

25 Next one: Why are all of the traffic studies

1 ("counts") done at times when Steele Canyon High School
2 is out of session?"
3 Are those traffic impacts not worthy of
4 inclusion in this project's projected impact?

BBBBB 55

5 Next question: How much is JIV's fair share?

BBBBB 56

6 Next question: JIV doesn't think there will be
7 major traffic increases from South Bay area along Otay
8 Lakes Road and Highway 94 East of the project; that is a
9 convenient and cost-saving oversight. Though, probably
10 incorrect at best, more likely a total fabrication.

BBBBB 57

11 Otay Lakes-Honey Springs Road intersection is
12 dangerous now, how will it be with threefold increase in
13 traffic?

BBBBB 58

14 Also "Rancho Jamul Drive, Las Palmas, Hillside,
15 Vista Diego, Indian Springs, Vista Sage, Villa Las

BBBBB 53 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response.

BBBBB 54 As shown in Figure 3-2 of the Traffic Impact Study, the intersection of SR-94 and Cougar Canyon Road was evaluated with counts conducted during school operations. The exhibit shows that at the time of the counts, a total of 579 vehicles entered Steele Canyon High School during the morning peak-hour period, and 472 vehicles exited the site at the same time. This represents typical high school operations at the intersection. The traffic impact study evaluates both AM and PM commuter peak-hour traffic periods along SR-94 to evaluate worse case conditions.

The analysis of the operations at the intersection of Courgar Canyon Road and SR-94 was included in the Traffic Impact Study report completed for the Final EIR.

BBBBB 55 It is not clear what cost figures the commeter refers to and what actions those costs were intended to cover. JIV will fully fund the SR-94 Improvements.

BBBBB 56 The Proposed Project consists of transportation improvements and will not adversely affect Otay Lakes Road. Please see RTC B1 and C1.

BBBBB 57 The Proposed Project consists of transportation improvements and will not adversely affect Otay Lakes Road. Please see RTC B1 and C1. The Proposed Project would not generate traffic, but will ameliorate traffic impacts and improve traffic movement.

BBBBB 58 The Proposed Project consists of transportation improvements and will not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1 and C1

COMMENTS	RESPONSES
16 Faldas, Rancho Miguel, private streets and driveways and 17 other side roads that lead to numerous residences.	
BBBBB 59 18 Next question: What is going to happen to the 19 shoulders along Highway 94 and access for bicycles? 20 Highway 94 is a denser cycling route for cyclists heading 21 east from San Diego, two points east, including those 22 riding across the country. 23 Are cyclists going to be squeezed into ever 24 smaller shoulders with ever more traffic withering by 25 over at five-to-six times their speed? Sounds like 24 1 slaughter alley to me.	BBBBB 59 The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 "Bikeway Planning and Design" of the Caltrans Highway Design Manual. For all the improvements, a minimum 8-foot shoulder would be provided, where bicycles would be able to travel as they do under existing conditions.
BBBBB 60 2 Last question: What mitigation measures will 3 be implemented to allow long and sometimes slow 4 accelerating vehicles, (toy haulers, horse trailers, et 5 cetera), to enter and exit roadway from side streets and 6 private driveways when after the project has been in 7 operation? There will be approximately 10 more cars per 8 minute on Highway 94 than at present. It is challenging 9 now to get on-and-off the road with a trailer.	BBBBB 60 Please see RTC B1 and C1.
10 That's all I got to say; thank you. 11	
BBBBB 61 12 MS. HOBAN: My is name Veronica Hoban. 13 Caltrans should be ashamed of themselves for 14 not acting as a lead agency but behaving more as a	BBBBB 61 Please see RTC B1 and C1.

COMMENTS		RESPONSES	
	15 project proponent by complicitly facilitating the 16 building of a casino in Jamul and for separating the 17 construction impacts from the operational impacts; 18 entirely inconsistent with the CEQA regulation that 19 requires that the totality of a project be assessed with 20 construction phase and operation phase; instead, they've 21 been a complicit partner with C.W. Driver and Penn 22 National to assist them in bootstrapping the project to a 23 point where we are now forced into a false decision. We 24 either are forced to accept a no project alternative, 25 which means they won't give us any infrastructure at all 25 1 to mitigate adverse, significant impacts to the traffic 2 on our roadways, or accept the mitigation that is 3 woefully inadequate.		
BBBBB 62	4 Again Caltrans should be ashamed of itself. It 5 should go back, look at the project in its totality, 6 including both the construction phase and operational 7 phase, make sure that they follow CEQA as it was intended 8 to be followed.	BBBBB 62	Please see RTC B1 and C1.
BBBBB 63	9 And I'm not just speaking, you know, without 10 support. The County of San Diego also holds this 11 position. The mere fact that they are litigating against 12 Caltrans with the very same issue of not following CEQA, 13 just demonstrates how shamefully Caltrans is neglecting	BBBBB 63	Please see RTC B1 and C1.

COMMENTS		RESPONSES
	14 its duty to be a fair and unbiased protector of the 15 communities from impacts associated with projects. They 16 are the guardian of the highway construction and 17 mitigating against adverse impacts and they're failing to 18 meet their duty. 19	
BBBBB 64	20 MS. BENNETT: My name is Nadine Bennett. 21 I was surprised to get an email from Caltrans 22 because we just haven't -- the project is starting 23 relatively soon and we haven't had any contacts from 24 Caltrans with the school district and I don't know, 25 because I'm not directly related to the Charter School, 26 1 but we all share Highway 94 and it's very important that 2 we have some communication and discussion about timelines 3 and how and when, which parts of the roads will be 4 impacted, you know, it's a big safety concern for us and 5 I think it's disappointing that we haven't had the 6 outreach to -- at least our district, that's all I can 7 speak about. I don't know whether Grossmont had 8 articulation with Caltrans for Steele Canyon High School 9 which is a Charter, so it's separate from Grossmont High 10 School District.	BBBBB 64 Caltrans has implemented the consultation outreach required by CEQA law, and as detailed in Chapter 6.0 Comments and Coordination of the Final EIR. Please see RTC BB4 and UUUU1.
	11 So we hope that there's some -- that we're 12 invited to some meetings and that we get additional	

C OMMENTS		RESPONSES
BBBBB 65	13 information, so that we can make some good decisions 14 about transporting our kids, and we use that highway 15 every day to transport our 60 kids and their parents and 16 we have parents coming on that road to drop off and to 17 pick up twice a day and buses make four-to-six runs a 18 day on that road, so it will be a big impact to us and we 19 want to make sure that children are safe and that we're 20 well informed and that we can inform our parents about 21 changes. 22 So again, I'll be happy to share the rest of my 23 comment and concerns from the Board but at this point, I 24 just wanted to share that communication. We really 25 appreciate a stronger communication. We're disappointed 27 1 to get an email that the meeting was happening; all 2 right.	BBBBB 65 Please see RTC BBBBB64.
	3 So thank you very much. 4 5 MR. SISSON: My is name Michael Sisson. 6 We're at 3178 Vista Diego Road, and that's 7 Jamul 91935.	
BBBBB 66	8 I have two concerns, one of them is living on 9 Vista Diego Road even with the existing traffic. It's 10 very difficult, even to make a right turn let alone make 11 a left turn, with the increased traffic that's predicted,	BBBBB 66 Please see RTC BBBBB28 and 29.

COMMENTS		RESPONSES	
	12 and I've heard a size of 30,000 daily average trips. I 13 don't believe that number. I think it's maybe more like 14 5,000 is likely to happen, but even that is going to make 15 it very difficult to go in or out of that private road.		
BBBBB 67	16 We've asked for a left turn pocket for 15 years 17 that I've lived there. We've been told, "No, it's not 18 possible," so I'm seeing today we have a stoplight plan 19 for Lyons Valley Road. The thing I wanted to be clear, 20 is that that's at the end of a long downhill grade. We 21 have a lot of 18-wheeled traffic and they don't like 22 stopping, so if there's a yellow light, they're going to 23 step on the gas and not slow down.	BBBBB 67	Please see RTC BBBBB28 and 29.
BBBBB 68	24 I think a better solution there and also at 25 Jefferson, would be a traffic circle. One traffic circle 28 1 wouldn't work but two of them would. If they were 2 generous in size and they were well advertised with 3 signage, truckers could get used to them and the rest of 4 us would too. We'd slow down to a reasonable 5 intersection speed, maybe 20, 25 miles an hour and then 6 we accelerate down Highway 94; that would be cheaper than 7 stoplights and I think in the long run it would be more 8 effective because there's no way to run a traffic circle.	BBBBB 68	Improvements at the intersection of Proctor Valley Road and SR-94 were not included within the project description or evaluated under this Final EIR.
	9 And I'm really worried about the people at the		

COMMENTS	RESPONSES
BBBBB 69 10 Lyons Valley intersection. If someone runs a red light 11 there, it's even worse than the way than it is now, 12 because right now people know that they're a target, so 13 they're very careful with the stoplight there, they may 14 not be as careful. 15 I rest my case. 16 17 MR. MENZIE: My name is Gordon Menzie. 18 And I live at 17095 Lyons Valley Road, sunny 19 Jamul, California 91935. 20 And so complaints are, and this is strictly a 21 Caltrans issue, we as Jamul residents have been suffering 22 a traffic impact on Highway 94 for the last two years 23 approximately, with what I have been able to research was 24 about a 13-and-a-half-million-dollar repaving project. 25 Now that the casino is eminent, San Diego Gas 29 BBBBB 70 1 and Electric has to pull new electric cables up the full 2 length of Highway 94 from Jamacha junction, tearing up 3 all the brand new concrete that's just been laid. 4 And this goes right past Steele Canyon High 5 School which has no sidewalks, just a dirt trail for 6 students to walk on. Their cross country athletic teams 7 run on that trail. It's within scant feet of the traffic 8 and so, to have the Lyons Valley -- to have State Route	BBBBB 69 Please see RTC BBBBB28 and 29. BBBBB 70 The intersection improvements at SR-94 and Steele Canyon Road would be designed and implemented following Chapter 1000 “Bikeway Planning and Design” of Caltrans Highway Design Manual. The traffic signal to be installed at this intersection would have the capability of detecting bicycles approaching or at the intersection in order to trigger the green light for that movement. The improvements would include the installation of an 8-foot shoulder along SR-94 where bicycles would be able to travel.

COMMENTS	RESPONSES
9 94 having been impacted for the last two years with 10 repaving, then to have another year of San Diego Gas and 11 Electric pulling electricity specifically for this new 12 casino and then, to have these mitigation improvements 13 made to the same highway, we're looking at about maybe 14 four years-to-five years total time that our traffic is 15 impacted and we can't get to work on time, plus the 16 safety issues of now the additional customer traffic to 17 the casino. The sale of alcohol will undoubtedly promote 18 drunk driving and right past the school with no 19 sidewalks.	
BBBBB 71 20 So I would love to see some more thought put 21 into public safety along the highways and some 22 consideration for taxpayers that have already spent 23 thirteen -- a million dollars of their money to have the 24 road resurfaced, then have it torn up 25 over-and-over-and-over again, and it's not very	BBBBB 71 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response.
30	
1 responsible, the use of taxpayer money, the amount of 2 work that a private business would have to do.	
BBBBB 72 3 And I've been involved in this in the past, to 4 mitigate traffic for something as simple as a sandwich 5 shop, a 7/11, is really disproportionate to what the 6 Indian Tribe is proposing to do for these mitigations. 7 They're totally inadequate and I think that the traffic	BBBBB 72 Please see RTC B1 and C1. The Project Final EIR contains detailed, legally adequate mitigation measures that reduce and/or avoid all impacts associated with the construction and operation of the specific series of traffic improvements that constitute the Proposed Project.

COMMENTS	RESPONSES
8 signals will actually may cause trouble, more traffic 9 than necessary in certain instances. 10 For instance, if the electronic signals are 11 sensitive to bicycle traffic along with everything else, 12 we get a tremendous amount of recreational bicycle 13 traffic up the road, whether they're turning -- they 14 don't seem to, bicycles don't seem to honor traffic 15 regulations up in the rural area. They go straight 16 through stop signs, so one errant bicyclist will cause 17 possibly 30-and-40 cars to have to stop unnecessarily and 18 just something that really needs to be looked into. 19 So safety, drunk driving and use of taxpayer 20 money is pretty much the summation of what I have to say; 21 thank you. 22 23 MS. SHENAS: Celeste Shenas. 24 On the first board, it's called the "key plan." 25 It does not address traffic coming from the eastern Chula 31 BBBBB 73 1 Vista area via Otay Lakes Road. This is a huge 2 community. 3 On the internet I pulled up a population of 4 just this eastern area of Chula Vista of 82,943. This is 5 the easiest and quickest way to get to Jamul from eastern 6 Chula Vista without going on a dirt Road. This is how I	BBBBB 73 The Proposed Project consists of transportation improvements and will not adversely affect Otay Lakes Road. Please see RTC B1 and C1. The Proposed Project would not generate traffic, but will ameliorate traffic impacts and improve traffic movement.

COMMENTS	RESPONSES
7 go shopping down to Lowe's. This is how I go to Otay 8 Ranch. This is the road that I use. It's a very curvy 9 road. The Border Patrol could probably give you more 10 information about the statistics of rollover, et cetera, 11 there. That intersection of Otay Lakes Road and Highway 12 94 was not addressed. This is a comment that I made the 13 last time we had a presentation like this, and I'm making 14 it again.	
BBBBB 74 15 The next board was titled: "Proposed SR 94 and 16 Jamacha Road improvement." 17 The additional turning lane from Campo onto 18 Campo Highway 94, makes a plug, especially during school 19 traffic hours for the High School at Steele Canyon Road. 20 Those two lanes turn into two lanes, which become one and 21 there's another stoplight. It's just a huge plug that 22 will back up onto Campo Road.	BBBBB 74 The intersection and roadway segment improvements included in this Final EIR were derived from the analysis included in the Final Tribal Enviromental Evaluation prepared for the JIV gaming facility (Final TEE, 2013), as mitigation measures for the JIV Gaming project direct traffic related impacts. Adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54 -Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.
BBBBB 75 23 The next board is called: "SR 94 at Steele 24 Canyon." 25 There is a growth grove of California live oak 32 1 trees behind the structures. The structures hold Steele 2 Canyon Produce and Bravo Cafe. 3 How will the burial or removal of an old growth 4 forest be mitigated? Trees are important. They make 5 what we use to breathe. If it's mitigated and they do	BBBBB 75 There are no trees in the SR-94 /Steele Canyon Intersection Improvement Area. The commenter is concerned about a grove of oak trees that occurs outside of the project area. No impacts to oak resources will occur from implementation of the SR-94/ Steele Canyon Intersection Improvements.

COMMENTS		RESPONSES
	6 the planting for every one they take down, it should be 7 in Jamul, somewhere where people have access to the trees 8 and not someplace where nobody can go and be around them 9 and in their shade and pulling air.	
BBBBB 76	10 Next board is called: SR 94 and Lyons Valley 11 Road." 12 Again, a loss of ancient oak forest on that	BBBBB 76 The impacts to coast live oak riparian forest (0.1 acre) identified in FEIR Section 2.16.2 would be mitigated as noted in Section 2.16.3 of the FEIR by either paying for 0.2 acres of coast live oak riparian forest via in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as areas on the 87-acre parcel that are designated hardline preserve).
BBBBB 77	13 board as well. Another thing that needs to happen with 14 this plan, is address the situation at the high school. 15 The traffic is horrible. It takes 20 minutes when you're 16 coming from the east during their traffic time when 17 school is beginning and ending to get past that area 20 18 minutes. It's not five minutes. It's not. It's 20 19 minutes during school time.	BBBBB 77 Please see RTC B1 and C1. BBBBB 78 Please see RTC B1 and C1.
BBBBB 78	20 Another thing that's really sad, is that, each 21 year at graduation the Principal has to hand out diplomas 22 to families of dead students. It's horrible. 23 My nephew graduated there two years ago and it 24 was just, it stops the ceremony. It's tragic, because I 25 live right there.	
	33	
BBBBB 79	1 Peaceful Valley Ranch Road where the Fire 2 Department comes out, I have a real hard time saying it's 3 okay to put more traffic in the way of the only emergency 4 services that the entire community of Jamul has. Jamul	BBBBB 79 Please see RTC B1 and C1.

COMMENTS	RESPONSES
5 consists of four huge valleys. We need speed and 6 efficiency from our emergency vehicles. We cannot get it 7 when there's excessive traffic and the Fire Department 8 has to share their right-of-way with so many other 9 vehicles.	
BBBBB 80 10 I have a problem with the light pollution from 11 all the different stoplights, from the streetlights that 12 will probably be added as well too, in the name of 13 keeping the area safe. We like our dark skies out here. 14 It's a big part of the quality of life that we have is 15 being able to see the skies at night.	BBBBB 80 The new signals will use Type III LED 160 watt full cut off lighting fixtures, which minimizes the amount of light emitted upward directly from the luminaire fixture.
BBBBB 81 16 I also would like to address the question of 17 why so many bus stops? As it is right now, we have, I 18 believe, two public buses that come up from Tecate a day, 19 and two that go back down. This is what I've been told. 20 I would be interested in seeing how full those are. I 21 think the bus company or Transit, San Diego Transit 22 probably has this statistic, but why do we need umpteen 23 bus stops all along this graded and dangerous highway? 24 If it's for to handle the additional people to 25 propose the casino, every casino has their own buses,	BBBBB 81 The proposed intersections and roadway projects would update existing bus stops along SR-94 that currently do not meet Caltrans or the San Diego Metropolitan Transit System bus stop standards. Only one additional bus stop is proposed, to be located at the site of the potential new traffic signals at either the intersection of Daisy Drive, Reservation Road or Melody Road depending on which access alternative is selected as the preferred alternative. The updgrades of the existing bus stops were not a result of anticipated transit ridership, but as a standard procedure for when intersections and roadway segments are improved. The goal for all transportation improvements is to bring existing locations to current standards.
34 1 thank you very much. The citizens of the community do 2 not need to pay for it, that's a business expense of	

COMMENTS		RESPONSES
	3 whoever is causing the need for those additional bus 4 rides.	
BBBBB 82	5 Something else all along the highway, are the 6 bike lanes. East County is a huge area for bicyclists on 7 the weekends and during the weekends and on holidays. 8 This adds a lot of danger to all of the roads, including 9 Otay Lakes Road. It's a very popular bicycle venue.	BBBBB 82 Please see RTC B1 and C1.
BBBBB 83	10 The other thing with bikes, as in 11 "motorcycles," is that every weekend there are motorcycle 12 accidents out there. There's a lot of stop-and-go with 13 this type of widening and closing back down into 14 two-lane roads, and that's not good for traffic when 15 you're riding a motorcycle.	BBBBB 83 Please see RTC B1 and C1.
BBBBB 84	16 Something else I'd like to share, is that my 17 in-laws live two doors east, two diveways east of Sycuan 18 Casino. They've been there for about 20 years. They've 19 seen the development happen living right next to a tribe 20 that had the gaming contract and developed a casino when 21 Sycuan did not have a liquor license, and I'm not sure if 22 they have one now. I'm not up on that. 23 When you would go there in the early morning, 24 the entire parking lot would be riddled with empty 25 alcohol bottles, cans, et cetera.	BBBBB 84 Please see RTC B1 and C1.

1 To say that a business doesn't have a liquor

COMMENTS	RESPONSES
license, therefore it's not bringing drunk drivers into the area, is a lot; people are buying their own, drinking in the parking lot, going into these type of businesses, coming out, finishing their drink, driving home drunk. I know this for sure, because my brother-in-law is a contractor and was doing some site improvements on their property for them and construction guys start their work day very early, 6:00 in the morning, so he was there in the mornings when all the cars were gone before it had gone and cleaned up; that's all I have to say. I would also like to comment in closing, that when you live in Jamul, each person knows somebody personally who has died on this road or it's one step removed from somebody who's passed away on this road in a car accident; that's the truth.	
MS. MULDER: I'm Janet Mulder. I live at 3394 Beaver Hollow Road in Jamul 91935. Phone number: 619.588.5672 and email: janetmulder02@gmail.com. I'm a member of the Jamul/Dulzura Community Planning Group and I have been a member since its inception in 1970, so I've dealt with this particular	

COMMENTS		RESPONSES	
	1 project for a number of years.		
BBBBB 85	2 I have many of the same concerns that I had 3 before but some of them are even a little different this 4 time. I want to make sure that Caltrans makes the JIV 5 take the ingress-and-egress of our local roads that 6 access off of SR 94 into consideration. This is a 7 serious safety issue.	BBBBB 85	Please see RTC B1 and C1.
BBBBB 86	8 Please make sure that Vista Sage, Vista Diego 9 and Otay Lakes Road, amongst others, have adequate, safe 10 ingress-and-egress and this is Caltrans responsibility 11 because I'm talking about where they enter and leave off 12 of SR 94. They'll probably need left turn lanes and that 13 kind of thing. I'm not a traffic engineer, but they are. 14 They'll know. Okay.	BBBBB 86	Please see RTC B1 and C1.
BBBBB 87	15 They should have to ensure -- "they" meaning, 16 "JIV" -- should have to ensure the safety before casino 17 operation, not just pay their fair share, because I've 18 been told by the Traffic Engineer that they are doing 19 there the complete changes on six different areas, 20 however paying for everything; however, that they would 21 just pay their fair share for any of the others, that's	BBBBB 87	Please see RTC B1 and C1.
BBBBB 88	22 wrong. There's an additional 9 ADTs according to their 23 own figures and so, please also look at Millar Ranch. 24 It's M-i-l-l-a-r Ranch Road, because in an emergency it	BBBBB 88	The comment appears to indicated that the project will have an additional 9 ADT's. This comment appears to misunderstand the Proposed Project evaluated in the SR-94 Improvement Project Draft EIR. The gaming facility currently under construction is not the Proposed Project. See RTC B1 and C1. The Proposed Project is a specific series of traffic improvements that will ameliorate traffic impacts and improve traffic movement. No additional traffic will be generated by the proposed project evaluated in the Final EIR

COMMENTS		RESPONSES	
	25 would be -- it could spell disaster because remember, 37 1 that that's the road that goes up to all of the areas up 2 there with all of the antennas and the cell towers and so 3 on, and so it could be very, very dangerous.		
BBBBB 89	4 My second -- another second point is that, more 5 work needs to be done. They need to look at the two-lane 6 bridge. It's right before you get to Steele Canyon High, 7 because here's the problem: 8 They have it coming down and they've made four 9 lanes coming both ways and before-and-after and yet this 10 is a two-lane bridge, that's a choke point; that's where 11 it's definitely going to stop everything and it's a risky 12 proposition. The JIV I think, needs to be responsible 13 for replacing the bridge because after all, they're the 14 ones putting the extra traffic on it. Okay.	BBBBB 89	Adding the proposed second eastbound right-turn lane at the intersection of SR-94 and SR-54- Jamacha Road would provide additional queuing capacity for this movement and decrease the overall delay at the intersection. The proposed operation for the dual-eastbound right-turn lanes would be similar to the existing operations at the intersection for the dual-westbound left-turn lanes. These two lanes of traffic would merge onto a single lane of traffic before Sweetwater River Bridge. As the vehicles entering SR-94 from the east and the west would be traveling at lower turning speeds, the existing lane drop configuration meets the traffic merging standards.
BBBBB 90	15 In addition, there are students walking along 16 SR 94 on a make-shift path between Steele Canyon High 17 School and the bridge, and the traffic on SR 94 will be 18 too fast and too heavy not to have JIV provide a safe 19 sidewalk for the students.	BBBBB 90	The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 “Bikeway Planning and Design” of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulleting (DIB) 82-05, with includes “Pedestrian Accessibility Guidelines for Highway Projects”.
BBBBB 91	20 And if you look at Cougar Canyon Road, which is 21 the road that goes up into the high school, into Steele 22 Canyon High School, it's another ingress-and-egress. It 23 has a lot of traffic and it needs to have some	BBBBB 91	Please see RTC B1 and C1.

COMMENTS		RESPONSES
	24 mitigating. There is a light there at this point, but 25 that doesn't cut down on the traffic guides. It just 38 1 makes it stop for a while.	
BBBBB 92	2 My third point is, that Steele Canyon Road and 3 Jamul Drive will both need shortcuts to the casino, and 4 they need to be taken into consideration for 5 deliberations. All of us that live in Jamul are very 6 aware of the shortcuts that we go through and so will 7 everyone else after they've driven it a couple of times, 8 so they need to look at that, and we've said this.	BBBBB 92 Please see RTC B1 and C1.
	9 By the way, none of these are new things for me 10 to bring up, because I've been bringing this up since the 11 very start, okay? 12 Thank you very much. 13 14 MR. CARUSO: I'm Caruso.	
BBBBB 93	15 I'd like to start telling you about my concern 16 right now, is I take my child to the high school in the 17 morning, and once I turn onto Highway 94 from Campo Road, 18 that road is being impacted so hard, so extensively 19 especially going over the bridge and heading past Millar 20 Road, heading east, southeast to the high school. It's 21 terrible, that intersection -- I don't know if people get 22 out there at 6:30 to 7:00 a.m., 7:30, but it's terrible.	BBBBB 93 Please see RTC B1 and C1.

COMMENTS		RESPONSES
	23 If there was a medical emergency, you would have to clear 24 out 150, 250 cars and trucks, just -- and it would slow 25 down, so that between there and then end up going up to 39 1 the intersection of the Steele Canyon area where the 7/11 2 is. 3 But getting back even to the high school, 4 there's only one entrance in-and-out and if there was a 5 fire like there was in'07, that's still very dangerous.	
BBBBB 94	6 There's also a very, very poor walkway for the kids to 7 walk out of there going to the shopping center. I have 8 numerous times been driving out of the high school and 9 kids, you know how the teenage kids are, they wrestle and 10 things like that, and I've had them literally fall over 11 the berm and half into the road in front of me while I'm 12 driving 50 miles an hour, so that's been very much a 13 concern, so we start adding a lot more people -- I just 14 don't want that part to be forgotten about, that's very, 15 very important especially for the safety of children.	BBBBB 94 The intersection and roadway improvements included in the Final EIR would be designed and implemented following Chapter 1000 “Bikeway Planning and Design” of the Caltrans Highway Design Manual. These improvements would be designed and constructed in a manner consistent with the Design Information Bulleting (DIB) 82-05, with includes “Pedestrian Accessibility Guidelines for Highway Projects”.
	16 And that's about it. If they're going to do 17 something, they might as well do it right and that's just 18 only about a mile. 19 Thank you very much. 20 21 My name is Robert A. Mendoza.	

COMMENTS

BBBBB 95

22 I live at 2406 South Barcelona Street, Spring
23 Valley and we are part of the community.
24 And anything that impacts our community and the
25 safety is very important to us; thank you very much.

1
2 MS. MULDER: Janet Mulder; 3394 Beaver Hollow
3 Road, Jamul 91935.

BBBBB 96

4 I want to add to my comment, saying it is
5 disgraceful that the owners of the businesses at Steele
6 Canyon southside of SR 94, were not informed that their
7 frontage parking spaces were to be removed. This will
8 possibly effectively make some of them have to quit their
9 businesses, because they won't have parking adjacent to
10 their building.

BBBBB 97

11 Please sit down and check out the need for that
12 extra lane that makes the taking of this property
13 necessary; thank you.
14
15 MS. GANT: My name is Laura Gant.
16 My address is 12856 Campo Road, Spring Valley
17 91978.

BBBBB 98

18 My driveway enters directly onto the 94 from
19 the "Ranch Feed Store;" even with the current volume of

RESPONSES

BBBBB 95 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response.

BBBBB 96 As noted in the Final EIR, the implementation of the improvements at the intersection of Steele Canyon Road and SR-94 would have a short term impact to the parking supply of some of the nearby businesses. As stated on page 2.3-9 of the Final EIR, prior to construction of the proposed roadway improvements at the intersection of SR-94 and Steele Canyon Road, the landowners and business owners affected by construction and implementation of the improvements would be contacted in advance of any potential approval for parking reconfiguration or replacement as a result of the proposed project. It is anticipated that as part of the project, additional parking spaces could be provided to support the existing businesses. In addition, coordination of the the construction phasing for the improvements, which would be constructed to minimize the temporary parking impact during construction, would include the existing business and property owners affected by the construction. At the completion of the improvements, the existing parking spaces currently within Caltrans ROW would be eliminated. The final parking configuration of the existing businesses adjacent to the proposed improvements would need to be compliant with the County of San Diego's parking requirements.

BBBBB 97 As noted in the Final EIR, the implementation of the improvements at the intersection of Steele Canyon Road and SR-94 would have a short term impact to the parking supply of some of the nearby businesses. As stated on page 2.3-9 of the Final EIR, prior to construction of the proposed roadway improvements at the intersection of SR-94 and Steele Canyon Road, the landowners and business owners affected by construction and implementation of the improvements would

COMMENTS	RESPONSES	
	BBBBB 97 cont.	be contacted in advance of any potential approval for parking reconfiguration or replacement as a result of the proposed project. It is anticipated that as part of the project, additional parking spaces could be provided to support the existing businesses. In addition, coordination of the the construction phasing for the improvements, which would be constructed to minimize the temporary parking impact during construction, would include the existing business and property owners affected by the construction. At the completion of the improvements, the existing parking spaces currently within Caltrans ROW would be eliminated. The final parking configuration of the existing businesses adjacent to the proposed improvements would need to be compliant with the County of San Diego's parking requirements. The improvements at the Steele Canyon Road and SR-94 intersection were designed to increase queuing capacity at the intersection and decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, acceleration and deceleration lengths were designed per the Caltrans Highway Design Manual and the California Manual on Traffic Control Devices. Having a second lane in the eastbound direction would facilitate and enhance the access for the businesses along the south side of SR-94, as the second lane would provide an opportunity for a slower lane of traffic for vehicles making a right-turn movement. The existing two-way left-turn lane along SR-94 would be maintained to facilitate the movement in and out of the existing driveways.
	BBBBB 98	The gaming facility currently under construction is not the Proposed Project. The Proposed Project would not generate additional traffic and therefore will not add any traffic to any roads along or off of SR-94. Please see RTC B1 and C1. The Proposed Project is a specific series of traffic improvemetns that will ameliorate traffic impacts and improve traffic movement.

COMMENTS		RESPONSES	
	20 traffic on the 94, at peak times it's very difficult to 21 even turn right in order to go west on the 94, then when 22 going east on the 94 to make a left into my driveway, it 23 is taking your life in your hands; you have to just jab 24 between cars. 25 And I see the plan on the boards here at the 41 1 meeting. It looks to me the traffic lanes are dropping 2 three-to-two right in front of my driveway, so I can't 3 imagine that that's going to make it any easier to enter 4 the roadway.		
BBBBB 99	5 Approximately a year ago, some pink survey 6 marker showed up in the lower third of my property, and 7 as I look on the maps they're showing, Caltrans, 8 depicting their plan, it looks to me like a big piece of 9 my property is going to be taken into Caltrans custody. 10 No one has spoken to me about it, purchasing or working 11 with me anything about taking my land, plus they've 12 entered property and put survey markers without even 13 discussing this with me.	BBBBB 99	The commenter must be referring to another project. No survey work on the SR-94 Improvement Project has been undertaken.
BBBBB 100	14 I have a problem that my bedroom window is 15 about 30 feet from the highway as it is now, and with the 16 increasing traffic volumes and 24-hour traffic, it'll be 17 all but impossible to sleep in that room. 18 Caltrans needs to put a soundwall there along	BBBBB 100	Please see RTC B1 and C1.

COMMENTS	RESPONSES
19 the edge of my property, the margin between the roadway 20 and my land in order for it to be livable there. 21 Otherwise, you know, my property values will 22 significantly decrease unless there's an opportunity for 23 my land to become commercial. It's going to be kind of 24 worse. 25 So the other issue I have, is that when I met 42 1 with Caltrans two years ago, I was told that if another 2 traffic lane was put into the freeway, they would 3 purchase my property. Well, it seems that the third 4 lane that would be added now, is dropping off just as it 5 passes my property and it just seems rather intentional. 6 I appreciate it if Caltrans would take the initiative 7 here to discuss this issue with me as well as the taking 8 of my property and easement. 9 And I'm representing my sister, Carol Tatum, 10 who lives at 13577 Vista Sage Lane, that's in Jamul 11 91935. 12 As a resident of Vista Sage, they have a huge 13 amount of danger going in-and-out of the roadway from 14 their property. As that Vista Sage meets the highway, 15 there's a blind curve there and if you go to turn left to 16 cross the eastbound traffic on the 94, you can't even see 17 the traffic coming, you have to just hope for the best	BBBBB 101 This comment does not raise any specific or significant environmental issues concerning the SR-94 Improvement Project Draft EIR and thus does not require any response. BBBBB 102 The improvements at the Steele Canyon Road and SR-94 intersection were designed to increase queuing capacity at the intersection and decrease overall vehicle delays. All intersection geometrics for lane width, shoulder width, acceleration and deceleration lengths were designed per Caltrans Highway Design Manual and the California Manual on Traffic Control Devices. The widening of this intersection and the lane drop distances used for the design correspond to Figure 405.9 “Widening of Two-Lane Road at Signalized Intersection” of the latest Caltrans Highway Design Manual. Per Caltrans standards, the additional lane must extend for a minimum of 300 feet pass the intersection before transitioning back to existing conditions at the required rate based on the design speed of the roadway, which in this case is 55 mph. Prior to construction of the proposed roadway improvements at the intersection of SR-94 and Steele Canyon Road, the landowners and business owners affected by construction and implementation of the improvements would be contacted and measures will be implemented to minimize disturbance to the access of the existing businesses and properties. BBBBB 103 Please see RTC B1 and C1.

COMMENTS	RESPONSES
18 and go. Meanwhile, the traffic behind you is likely to 19 come up and rear-end you because there's no turn lane, so 20 Vista Sage has not been adequately addressed and the 21 increasing traffic volume will make her address very 22 difficult to come in-and-out of the freeway. 23 But we've had several traffic wrecks there and 24 with the high rate of speeds, there's been real serious 25 injuries and even a death at that intersection, so that 43 1 needs to also be addressed, so thank you.	
BBBBB 104 2 I have one more comment. I think when Caltrans 3 measured the sound for this study, they measured up on my 4 hill. The sound rises up above and gets cut off there at 5 that point, plus it's way further off the road than my 6 house is, so I didn't think that sound problems have been 7 adequately measured or addressed by Caltrans because of 8 where they place the measuring device that they use to 9 study this proposed roadway. I don't think that's 10 accurate at all. 11 And, you know, the sounds down there it's 12 really loud, especially with the trucks and thinking 13 there's going to be 24-hour traffic. It's going to be 14 very unreasonable to kind of live in that, especially 15 going from rural to urban, specifically. Throw that one 16 in there.	BBBBB 104 Noise measurement locations were used in conjunction with traffic volumes and existing topography to validate the noise model. Validation of the noise model ensures the future model once altered to incorporate the future roadway alignment and elevation data, including any grading, accurately predicts future noise level at selected receiver locations. The noise measurement locations do not represent modeled receiver locations. Thus, once the traffic noise model is validated, the location of the noise measurement is not relevant to the predicted noise level at specific receiver locations, which are chosen to represent the locations of frequent human use that would benefit from noise abatement. Please also note the Casino project was approved under a separate environmental study and is not part of the SR-94 project. The SR-94 project is intended to address future traffic issues from traffic volumes projected to occur on SR-94 in the project vicinity.

COMMENTS	RESPONSES
I don't see a Vista Sage box. (Whereupon the Caltrans Public Hearing concluded at 8:00 p.m.) \\ \\	

STATE OF CALIFORNIA)
COUNTY OF SAN DIEGO)

I, Gloria D. Mazon, C.S.R. No. 9356, hereby certify, that the foregoing statements from this public hearing were recorded true to the best of my ability by electronic transcription, and supervised under my supervision.

Dated in San Diego, California, this 12 day, of August, 2015.

Gloria D. Mazon CSR No. 9356

CHAPTER 7.0

LIST OF PREPARERS

Chapter 7 – List of Preparers

This Final EIR and related technical studies were prepared by and under the supervision of Caltrans District 11 staff and other contributors identified below.

California Department of Transportation – District 11

Bruce April: Deputy District Director, Environmental; B.S. Biology, 26 years Caltrans experience.

Dave Nagy: Environmental Branch Chief, Senior Environmental Planner; B.S. Forestry and Natural Resources Management, 15 years Caltrans experience.

Jamie LeDent: Associate Environmental Planner; B.A. History, 8 years Caltrans experience.

Katie Basinski: Associate Environmental Planner; B.A. Geography, 7 years Caltrans experience

Claudia Barron: Graphic Designer III; BFA, 25 years of Caltrans experience.

Karen Craft: Associate Environmental Planner (Archaeology); B.A., Anthropology, 33 years Caltrans experience.

Mike Galloway: Associate Environmental Planner (Natural Sciences); B.A., Biology; M.A., Marine Biology, 13 years Caltrans experience.

Jayne Dowda: Environmental Engineering Branch Chief; B.S. Civil Engineering, 28 years Caltrans experience.

Michelle Madigan: Associate Environmental Planner; B.A., Environmental Studies; M.A., City Planning, 16 years Caltrans experience.

Michelle Blake: Environmental Planner, Archaeology; B.A. Anthropology, M.A. Cultural Resource Management, 2 years Caltrans experience.

Tim Mann: Tim Mann, LA4143, Associate Landscape Architect; B.S. Accounting Theory and Practice, 8 years Caltrans experience.

Diane Vermeulan: Hazardous Waste Specialist; B.S. Civil Engineering, 21 years Caltrans experience.

Paul Swearingen: Transportation Engineer, PE; B.S. Civil Engineering, 8 years Caltrans experience.

Danielle Zhang: Landscape Associate, Erosion Control Specialist; Master of Landscape Architecture, 16 years of Caltrans experience.

Environmental Data Systems, Inc.

Joe Broadhead, EDS, Inc. Principal, B.S. Natural Resource Planning and Interpretation, 26 years CEQA experience, 8 years EDS, Inc. experience.

Natural Investigations

Gary O. Graening, Principal Biologist, PhD in Biological Sciences, Masters of Science in Biological and Agricultural Engineering. 17 years experience in biological assessment.

Cindy Arrington: Principal Cultural Resources, M.A. Archaeology, 19 years experience.

Nancy Sikes: Principal Investigator Cultural Resources, Ph.D. Anthropology, 23 years experience.

Kimley Horn and Associates

Leo Espelet, PE, TE, Kimley-Horn and Associates, Inc., Senior Engineer, Traffic, 12 years CEQA experience, 10 years Kimley-Horn and Associates, 8 years Caltrans experience.

Jason Valencia, PE, Kimley-Horn and Associates, Inc., Senior Engineer, Civil, 8 years Kimley-Horn and Associates. 13 years Caltrans experience.

Alex H. Jewell, AICP, Kimley-Horn and Associates, Inc., Senior Project Manager, B.A., Environmental Studies, 19 years CEQA experience, 6 years Caltrans Experience.

Ldn Consulting, Inc.

Jeremy Louden, Noise and Air Quality, B.S. Civil Engineering, 12 years Caltrans experience.

Helix Environmental Planning

Tamara S. Ching, Planning Division Manager, HELIX Environmental Planning; M.S. Administration, U.C. Irvine; B.A. Social Ecology, U.C. Irvine; 36 years experience.

Tim Belzman, Helix Environmental Planning, Senior Project Manager, M.S. City Planning, 15 years CEQA experience

Lisa Kay Capper, JD, Helix Environmental Planning, Principal Planner, B.A. Anthropology, Juris Doctorate, 35 years CEQA experience

Geocon, Inc.

Yong Wang, PE, GE, Geocon Inc., Senior Engineer, Geotechnical, 13 year Geocon Inc., 15 years Caltrans experience.

Cogstone

Sherri Gust: Principal Investigator, Paleontology; M.S. Anatomy (Evolutionary Morphology), 35 years Caltrans experience.

Kim Scott: Director, Paleontology; M.S. Biology (Paleontology), 18 years Caltrans experience.

Courtney Richards: Supervisor, Paleontology; M.S. Biological Sciences (Paleontology), 3 years Caltrans experience.

Estrada Land Planning

David Preciado, Licensed Landscape Architect, B.S. Landscape Architecture, 22 years experience.

Vicki Estrada, Licensed Landscape Architect, B.S. Landscape Architecture, 39 years experience.

CHAPTER 8.0

DISTRIBUTION LIST

Chapter 8 – Distribution List

Federal, State and Local Elected Officials

Honorable Joel Anderson California State Senate 38th District 500 Fesler Street, Suite 201 El Cajon, CA 92020	Honorable Brian Bilbray U.S. Representative, 50th District 462 Stevens Ave. Suite 107 Solana Beach, CA 92075	Honorable Marty Block California State Senate, 39th District 701 B Street, Suite 1840 San Diego, CA 92101
Honorable Barbara Boxer U.S. Senator 600 B Street, Suite 2240 San Diego, CA 92101	Governor Edmund G. Brown C/O State Capitol, Suite 1173 Sacramento, CA 95814	Honorable Greg Cox Supervisor 1st District 1600 Pacific Highway, Room 335 San Diego, CA 92101
Honorable Susan Davis U.S. House of Representatives 53rd District 2700 Adams Avenue, Suite 102 San Diego, CA 92116	Honorable Dianne Feinstein U.S. Senator 880 Front Street, Suite 4236 San Diego, CA 92101	William D. Gore, Sheriff 9621 Ridgehaven Court San Diego, CA 92123
Honorable Bill Horn Supervisor 5th District 1600 Pacific Highway, Room 335 San Diego, CA 92101	Honorable Duncan Hunter House of Representatives 50th District 1611 N. Magnolia Ave., Suite 310 El Cajon, CA 92020	Honorable Darrell Issa U.S. House of Representatives 49th District 1800 Thibodo Road, Suite 310 Vista, CA 92081
Honorable Dianne Jacob Supervisor 2nd District 1600 Pacific Highway, Room 335 San Diego, CA 92101	Honorable Brian Jones State Assembly, 71ST District 10152 Mission Gorge Rd. Santee, CA 92071	Honorable Christine Kehoe State Senator, 39th District 2445 5th Avenue Suite 200 San Diego, CA 92101
Chris McAdams Jamul-Dulzura Union School District Board of Education 14661 Lyons Valley Road Jamul, CA 91935	Honorable David W. Roberts Supervisor 3rd District 1600 Pacific Highway, Room 335 San Diego, CA 92101	Honorable Ron Roberts Supervisor 4th District 1600 Pacific Highway, Rm 335 San Diego, CA 92101
Hon. Mayor Mary Casillas Salas City of Chula Vista 276 Fourth Avenue Chula Vista, CA 91910	Hon. Mayor Mary Teresa Sessom City of Lemon Grove 3232 Main Street Lemon Grove, CA 91945	Honorable Mayor Bill Wells City of El Cajon 200 Civic Center Way El Cajon, CA 92020
Honorable Mark Wyland State Senator, 38th District 1910 Palomar Point Way #105 Carlsbad, CA 92008	Nadine Bennett, Superintendent JDUSD District Office 14581 Lyons Valley Road Jamul, CA 91935	CA Department of Fish and Wildlife Gail Sevrens South Coast Region 3883 Ruffin Road San Diego, CA 92123

CA Department of Fish and Wildlife Mr. Tim Dillingham South Coast Region 3883 Ruffin Road San Diego, CA 92123	Caltrans Liason Richard Chin 5510 Overland Ave. Suite 310 San Diego, CA 92123	City of Chula Vista City Attorney Glen R. Googins 276 Fourth Avenue Chula Vista, CA 91910
City of Chula Vista City Clerk Donna Norris 276 Fourth Avenue Chula Vista, CA 91910	City of Chula Vista City Mgr. James D. Sandoval 276 Fourth Avenue Chula Vista, CA 91910	City of El Cajon City Attorney Morgan Foley 200 Civic Center Way El Cajon, CA 92020
City of El Cajon City Clerk Kathie Rutledge 200 Civic Center Way El Cajon, CA 92020	City of El Cajon City Manager Douglas Williford 200 Civic Center Way El Cajon, CA 92020	City of Lemon Grove City Clerk Susan Garcia 3232 Main Street Lemon Grove, CA 91945
City of Lemon Grove City Attorney James Lough 3232 Main Street Lemon Grove, CA 91945	City of Lemon Grove City Manager Graham Mitchell 3232 Main Street Lemon Grove, CA 91945	County of San Diego Ernest J. Dronenburg, Jr San Diego County Clerk 1600 Pacific Highway, Room 260 San Diego, CA 92101
County of San Diego Eric Lardy Land use/Environmental Planning Manager Planning & Development Services 5510 Overland Ave. Suite 310 San Diego CA. 92123	County of San Diego Todd Snyder Chief Advance Planning Planning and Development Services 5510 Overland Avenue, Ste 110 San Diego, CA 92123	County of San Diego Mark Wardlaw, Director Planning & Development Services 5510 Overland Ave., Suite 310 San Diego, CA 92123
San Diego Association of Governments Alisa Anas 401 B Street, Suite 800 San Diego, CA 92101	San Diego Association of Governments Gary Gallegos Executive Director 401 B Street Suite 800 San Diego, CA 92101	San Diego County Sheriff's Campo Substation 378 Sheridan Rd., PO Box 7 Campo, CA 91906-0007
San Diego County Sheriff's Lemon Grove Station 3240 Main Street Lemon Grove, CA 91945-1705	San Diego Rural Fire Protection District David Nissen, Division Chief 14024 Peaceful Vally Ranch Rd. Jamul, CA 91935	U.S. Fish and Wildlife Service Ms. Sally Brown 6010 Hidden Valley Road, Ste. 101 Carlsbad, CA 92011
U.S. Fish and Wildlife Service Ecological Services Karen A. Goebel 2177 Salk Avenue, Suite 250 Carlsbad, CA 92008	US Post Office 10174 Austin Drive Spring Valley, CA 91977	US Post Office 13961 Campo Road Jamul, CA 91935

US Post Office 401 West Lexington El Cajon, CA 92020	Ed Pert CDFW, South Coast Region 3883 Ruffin Road San Diego, CA 92123	El Cajon Branch Library 201 E. Douglas El Cajon, CA 92020

Libraries

Casa de Oro Branch Library 9805 Camp Road #180 Spring Valley, CA 91977	Crest Branch Library 105 Juanita Lane El Cajon, CA 92021	El Cajon Branch Library 201 E. Douglas El Cajon, CA 92020
La Mesa Branch Library 8074 Allison Avenue La Mesa, CA 91942	South Chula Vista Branch Public Library 389 Orange Ave Chula Vista, CA 91911	Spring Valley Branch Library 836 Kempton Street Spring Valley, CA 91977

Native American Organizations

Barona Group of Capitan Grande Clifford LaChappa, Chairperson 1095 Barona Road Lakeside, CA 92040	Campo Band of Mission Indians Ralph Goff, Chairperson 36190 Church Road, Suite 1 Campo, CA 91906	Ewiiaapaayp Tribal Office Will Micklin, Director 4054 Willows Road Alpine, CA 91901
Iipay Nation of Santa Ysabel Clint Linton Director of Cultural Resources P.O. Box 507 Santa Ysabel, CA 92070	Iipay Nation of Santa Ysabel Virgil Perez, Spokesman P.O. Box 130 Santa Ysabel, CA 92070	Inaja Band of Mission Indians Rebecca Osuna, Chairperson 2005 S. Escondido St. Escondido, CA 92025
Inter -Tribal Cultural Resource Protection Council Frank Brown Coordinator Viejas THPO 240 Brown Road Alpine, CA 91901	Jamul Indian Village Erica M. Pinto, Chairperson P.O. Box 612 Jamul, CA 91935	Kumeyaay Cultural Repatriation Committee Steve Banegas, Spokesperson 1095 Barona Road Lakeside, CA 92040
Kumeyaay Cultural Historic Committee Ron Christman 56 Viejas Grande Road Alpine, CA 92001	Kumeyaay Cultural Repatriation Committee Bernice Paipa, Vice Spokesperson 1095 Barona Road Lakeside, CA 92040	Kumeyaay Diegueno Land Conservancy Kim Bactad, Executive Director 2 Kwaaypaay Court El Cajon, CA 91919
Kwaaymii Laguna Band of Mission Indians Carmen Lucas P.O. Box 775 Pine Valley, CA 91962	La Posta Band of Mission Indians Gwendolyn Parada, Chairperson 8 ½ Crestwood Road Boulevard, CA 91905	Manzanita Band of Kumeyaay Nation Nick Elliot Cultural Resource Coordinator P.O. Box 1302 Boulevard, CA 91905

Manzanita Band of Kumeyaay Nation Leroy J. Elliot, Chairperson P.O. Box 1302 Boulevard, CA 91905	Mesa Grande Band of Mission Indians Mark Romero, Chairperson P.O. Box 270 Santa Ysabel, CA 92070	Native American Heritage Commission 1550 Harbor Boulevard, Ste 100 West Sacramento, CA 95691
San Pasqual Band of Mission Indians Allen E. Lawson P.O. Box 365 Valley Center, CA 92082	Sycuan Band of Kumeyaay Nation Cody J. Martinez, Chairperson 5459 Sycuan Road El Cajon, CA 92019	Sycuan Band of Kumeyaay Nation Sydney Morris Environmental Coordinator 5459 Sycuan Road El Cajon, CA 92019
Viejas Band of Kumeyaay Indians Julie Hagen Cultural Resources P.O. Box 908 Alpine, CA 91903	Viejas Band of Kumeyaay Indians Anthony A. Pico, Chairperson P.O. Box 908 Alpine, CA 91903	

Publications

The Alpine Sun Lori Bledsoe 2144 Alpine Blvd. Alpine, CA 91901	East County Californian Albert H. Fulcher 119 Magnolia Ave El Cajon, CA 92020	East County Gazette Debbie Norman 1130 Broadway El Cajon, CA 92021
East County Herald Steve Hamman P.O. Box 2568 Alpine, CA 91903	San Diego Union Tribune 350 Camino De La Reina San Diego, CA 92108	Star News Carlos R. Davalos 296 3rd Avenue Chula Vista, CA 91910

Interested Groups and Individuals

Boulevard Community Planning Group Donna Tisdale P.O. Box 1275 Boulevard, CA 91905-0375	Campo Lake Morena Community Planning Group Billie Jo Jannen 28736 Highway 94, Unit #1 Campo, CA 91906	Chula Vista Rotary President Rowena Bell PO Box 626 Chula Vista, CA 91912-0626
Dulzura Community Development Board Garth Camp, President Dulzura Community Center 1136 Community Building Road Dulzura, CA 91917	Dulzura/Barrett Fire Safe Council Dulzura Community Center 1136 Community Building Road Dulzura, CA 91917	Grossmont Union High School District Governing Board PO Box 1043 La Mesa, CA 91944
Highway 94 Club Larry Johnson Barrett Junction Café 1020 Barrett Lake Rd Dulzura, CA 91917	Jacumba Community Sponsor Group Howard Cook P.O. Box 486 Jacumba, CA 91934	Jamul Dulzura Community Planning Group Jean Strouf 16089 Lyons Valley Rd. Jamul, CA 91935

Kiwanis Club of Greater Jamul Foundation Slate Montgomery PO Box 267 Jamul, CA 91935-0267	Kiwanis Club of Mountain Empire – Campo Stephanie Connolly 976 Sheridan Rd, Campo, CA 91906	Kiwanis Club of Potrero – Tecate P.O. Box 71 Potrero, CA 91963
Kiwanis Club of Rancho San Diego 891 Singing Heights Drive El Cajon, CA 92019	Lakes Kean Argovitz Resort, LLC 130 Cheshire Ln #101 Minnetonka, MN 55305	McGrath Family YMCA Jennifer Pillsbury Assoc. Executive Director 12006 Campo Road Spring Valley, CA 91978
Otay Mesa Chamber of Commerce Alejandra Miery Teran 9163 Siempre Viva Road, Suite I-2 San Diego, CA 92154	Otay Mesa Community Planning Group Rob Hixson 350 10th Ave Ste. 800 San Diego, CA 92101	Otay Mesa Nestor Community Planning Group Alberto Velasquez 3842 Chanute St. San Diego, CA 92154
Peaceful Valley Ranch, LLC 127 Public Sq Cleveland, OH 44014	Potrero Community Planning Group William Crawley P.O. Box 9 Potrero, CA. 91963-0009	Rancho Jamul Estates Homeowners Association Patrick Webb 402 West Broadway Ste. 680 San Diego, CA 92101
San Diego Astronomy Association Michael Vander Vorst, President P.O. Box 23215 San Diego, CA 92193-3215	San Diego East County Chamber of Commerce Eric Lund 201 S. Maganolia Ave. El Cajon, CA 92020	San Diego East County Economic Development Council John Minto, Chairman 1870 Cordell Ct. Suite 202 El Cajon, CA 92020
San Diego Regional Chamber of Commerce Jerry Sanders 402 W Broadway #1000 San Diego, CA 92101	San Diego State University Department of Astronomy & Mount Laguna Observatory 5500 Campanile Drive San Diego, CA 92182-1221	San Ysidro Community Planning Group Michael Freedman 3833 Via del Bardo San Ysidro, CA 92173-1557
Sierra Club San Diego Chapter 8304 Clairemont Mesa Blvd #101 San Diego, CA 92111	Spring Valley Chamber of Commerce Tina Carlson, Executive Director 3322 Sweetwater Springs Blvd. #202 Spring Valley, CA 91977	Spring Valley Community Planning Group James Comeau P.O. Box 1637 Spring Valley, CA 91977-1637
Sweetwater Community Planning Group Sheri Todus P.O. Box 460 Bonita, CA 91908-0460	Steele Canyon High School 12440 Campo Road Spring Valley, CA 91978	The Jamul Shopper & News Tammy Grant PO Box 31 Jamul, CA 91935
The Rancho San Diego Towne Center VESTAR Property Management Office 2907 Shelter Island Dr., Suite 219 San Diego, CA 92106	Valle De Oro Community Planning Group 3755 Avocado Blvd, #187 La Mesa, CA 91941	4 D W W, LLC 861 6th Avenue, Suite 310 San Diego, CA 92101

Cynthia Albert 14077 Proctor Valley Road Jamul, CA 91935	Steve Albreat 3189 Vista de Chaparros Jamul, CA 91935	Wick Alexander 1116 Marron Valley Road Dulzura, CA 91917
Julia Allen 3111 Impink Place Jamul, CA 91935	Kate Allison 15780 Castle Peak Lane Jamul, CA 91935	Dale Amato 13909 Illerongis Road Jamul, CA 91935
Peter and Janis Andersen 3897 Hidden Trail Drive Jamul, CA 91935	Curtis and Sharon Anderson 14165 Myrtle Street Jamul, CA 91935	Aphram Y & Maha Bazzi 14018 Las Palmas Rd Jamul, CA 91935
Chris and Vicki Beers 14764 Lyons Valley Road Jamul, CA 91935	Don Beers 14764 Lyons Valley Road Jamul, CA 91935	Mark and Diane Bender 13220 Proctor Valley Road Jamul, CA 91935
Dan and Nadine Bennett 19614 Deerhorn Valley Road Jamul, CA 91935	Dana Blasi 3180 Reservoir Drive Jamul, CA 91935	Robin Bratsford 116 Marron Valley Road Dulzura, CA 91917
Ruth Brewer 19305 Via Pamela #490 Jamul, CA 91935	Preston Brown 2949 Lyons Creek Lane Jamul, CA 91935	Mark Bruning 3798 Hidden Ridge Road Jamul, CA 91935
Andrea Bustos-Mason 15106 Lyons valley Road Jamul, CA 91935	Alison Buzek P.O. Box 1234 Jamul, CA 91935	Ross Buzek 20659 Tumeric Way Jamul, CA 91935
Rene Cardinale 3177 Marlena Way Spring Valley, CA 91978	Peggy J.M. Carlberg 2481 Congress St. San Diego, CA 92110	Michael Casinelli 3268 Armagosa Way Jamul, CA 91935
Linda Chan 14897 Presilla Drive Jamul, CA 91935	Gary Clasen 14101 Hillside Drive Jamul, CA 91935	Rick Craven P.O. Box 222 Jamul, CA 91935
David Damian 2124 Honey Springs Road Jamul, CA 91935	Lisa Darroch 12863 Vista Cielo Spring Valley, CA 91978	Jack and Melanie Davis 2920 Pioneer Way Jamul, CA 91935
Ray Deitchman 13927 Maxfield Road Jamul, CA 91935	Stephanie Dillon 3743 Hidden Trail Drive Jamul, CA 91935	Vernon Doviett 13559 Vista Sage Lane Jamul, CA 91935
Phyllis Dozier P.O. Box 490 Jamul, CA 91935	Mary Duffy 21181 Deerhorn Valley Road Jamul, CA 91935	Mike Ellison 16089 Lyons Valley Road Jamul, CA 91935
Cynthia Evans 13589 Vista Sage Lane Jamul, CA 91935	Stan Evosevich 19476 Elena Lane Jamul, CA 91935	William R. Fair 13518 Proctor Valley Road Jamul, CA 91935
Dan Floit 3565 7th Avenue San Diego, CA 92103	Joel, Marshall & Lois Friedman 14043 Highway 94 Jamul, CA 91935	Daniel and S. Floyd 1568 Corte del las Piedras El Cajon, CA 92019
Vernon Fry 3250 Via Las Faldas Jamul, CA 91935	Laura and Mary Gant 12856 Campo Road Spring Valley, CA 91978	Janet Greene P.O. Box 648 Jamul, CA 91935

Rick and Pamela Griffin 3339 Indian Mills Lane Jamul, CA 91935	Laura Grihin-Gross 13932 Calle Bueno Ganar Jamul, CA 91935	Kimberly Hamilton 19580 Elena Lane Jamul, CA 91935
Ledie Hamrick-Smith 15425 Leoney Lane Jamul, CA 91935	Michael and Margaret Hance 20781 Deerhorn Valley Road Jamul, CA 91935	Angela and Kip Hanzel 13569 Vista Sage Lane Jamul, CA 91935
Nancy Harrelson 13789 Calle del Sol Jamul, CA 91935	Terri Haruraves 16433 Lawson Valley Road Jamul, CA 91935	John Hayes 3391 Greystone Drive Jamul, CA 91935
William Hendrix 14169 Hillside Drive Jamul, CA 91935	Bill Herde 2839 Echo ValleyRoad Jamul, CA 91935	Robert Higginson 3858 Alta Loma Center Jamul, CA 91935
Robert Hill 19563 Pringle Canyon Road Jamul, CA 91935	Dennis and Diane Hines 13911 Via de Jamul Jamul, CA 91935	Veronica Hoban 2776 Vista del Piedra Jamul, CA 91935
Candace Hoff 13650 Proctor Valley Road Jamul, CA 91935	Pete Hoffman 14154 Hillside Drive Jamul, CA 91935	Debbie Hornsby P.O. Box 1032 Jamul, CA 91935
Caroline Cauchi and Mel Hovell 3570 Trinas Way Jamul, CA 91935	John and Mary Hovey 3411 Waverly Court Jamul, CA 91935	Charles Hyde 3202 Armagosa Way Jamul, CA 91935
Jeanne M. Hyde 3202 Armagosa Way Jamul, CA 91935	Tonie and John Hyde 1211 Marron Valley Road Dulzura, CA 91917	Sandra Ignosci 19502 Elena Lane Jamul, CA 91935
Larry Johnson 1259 Dewey Place Campo, CA 91906	Dean Jones 2718 Vista del Piedra Jamul, CA 91935	Darla Kasmedo 13924 Calle Bueno Ganar Jamul, CA 91935
Jeff and Ann Katzenmeyer 14796 Wild Mustang Place Jamul, CA 91935	John Kaufman 2840 Pioneer Way Jamul, CA 91935	David and Hope Keesling P.O. Box 602 Jamul, CA 91935
Susan Jo Keller 17909 Mark Lee Drive Jamul, CA 91935	Paul Kellogg P.O. Box 201 Descanso, CA 91916	Dorene Kelogg 3247 Via Las Faldas Jamul, CA 91935
Vickie Kerley 2080 Via Laura Jamul, CA 91935	Denver and Emma King 14528 Olive Vista Drive Jamul, CA 91935	Kingdom Trust 3067 Whispering Crest Drive Henderson, NV 89052
Jim and Doris Kyle Family Trust 9121 Guys Gullch Rd Yreka, CA 96097	Debra Lehew P.O. Box 848 Jamul, CA 91935	Carol Lembke 15177 Skyline Truck Tail Jamul, CA 91935
Cynthia Linstad 3184 Vista Diego Rd Jamul, CA 91935	Hughie and Geraldine Lyons 64213 Hillside Drive Jamul, CA 91935	Eileen Marks 13550 Vista Sage Lane Jamul, CA 91935
Rich Marzec 13964 Calle Bueno Ganar Jamul, CA 91935	Marcy May 13997 Whispering Meadows Lane Jamul, CA 91935	Aaron and Vicki McCalmatt 14691 Chaparral Slope Rd Jamul, CA 91935

Anita and Scott McClatchey 2765 Vista del Piedra Jamul, CA 91935	Nancy and James McMurren 13929 Maxfield Road Jamul, CA 91935	Ralph and Connie McNeil 19291 Deerhorn Valley Jamul, CA 91935
SDG & E Attn: Dashiell Meeks, PE, AICP 8315 Century Park Court, CP21E San Diego, CA 92123	Bob Mendoza 2406 So. Barcelona Street Spring Valley, CA 91977	Gordon Menzie 17095 Lyons Valley Road Jamul, CA 91935
Gene Merlino 2124 Honey Springs Road Jamul, CA 91935	Carl Meyer P.O. Box 9 Potrero, CA 91963	Alton and Barbara Morris 14075 Short Center Jamul, CA 91935
Barbara Gervais Moya 14797 Wild Mustang Pl Jamul, CA 91935	Gil Moya 14797 Wild Mustang Place Jamul, CA 91935	Ronald Mueller 3838 Rudnick Drive Jamul, CA 91935
Gerald and Janet Mulder 3394 Beaver Hollow Road Jamul, CA 91935	Gary Musser 15229 Lyons Valley Road Jamul, CA 91935	N & S Jamul Properties, LLC 12880 Campo Rd Spring Valley, CA 91978
Dan Neirincky 13586 Jamul Drive Jamul, CA 91935	Tracie Nelson 14715 Campo Road Jamul, CA 91935	Nelson Revocable Trust 325 Kempton St #504 Spring Valley, CA 91977
Bradford L. Nobel 12931 Highway 94 Jamul, CA 91935	David Norberg 14547 Rancho Jamul Drive Jamul, CA 91935	Susan and James Norton 20783 Deerhorn Valley Road Jamul, CA 91935
Robert Novinskey 2818 Valley Knolls Road Jamul, CA 91935	James Okrey 3201 Armagosa Way Jamul, CA 91935	Colleen O'Krey 2675 Fletcher Parkway #13 El Cajon, CA 92020
Streeter Parker 14135 Highway 94 Peaceful Valley Ranch Road Jamul, CA 91935	Lori and Lew Parlette 3051 Miramontes Rd Jamul, CA 91935	Eric & Linnea Peltola 3282 Via Las Faldas Jamul, CA 91935
Jen Pitman 15117 Skyline Truck Trail Jamul, CA 91935	Eileen Poole 3209 Pleasant View Lane Jamul, CA 91935	Verna Poorbaugh 13927 Proctor Valley Road Jamul, CA 91935
Louis and Cathy Proscelle Trust 14051 Campo Road Jamul, CA 91935	Dale and Joy Pruitt 2997 Wildwind Drive El Cajon, CA 92019	Juleel Purkey 14601 Alkosh Road Jamul, CA 91935
Amber Beers-Puyear & Sean Puyear 3295 Altoro Lane Jamul, CA 91935	Mary Jane Quinn 19563 Pringle Canyon Road Jamul, CA 91935	Scott Reiche 15780 Castle Peak Lane Jamul, CA 91935
Glenn Revel 1869 Honey Springs Road Jamul, CA 91935	Mark Robak 3217 Fair Oaks Lane SpringValley, CA 91978	Andy Salmonsen 13941 Calle Bueno Ganar Jamul, CA 91935
Peter and Celeste Shenas 2708 Vista del Piedra Jamul, CA 91935	Mr. and Mrs. M.K. Sisson 3178 Vista Diego Road Jamul, CA 91935	Nancy Smith 14086 Las Palmas Road Jamul, CA 91935

Marcia Spurgeon P.O. Box 1139 Jamul, CA 91935	Mike Stalnaken 15585 Lyons Valley Road Jamul, CA 91935	Richard St Jean 14191 Highway 94 Jamul, CA 91935
Jean Strouf 16089 Lyons Valley Road Jamul, CA 91935	Joe Stuyvesant 13457 Farraday Ridge Road Jamul, CA 91935	Larry and Jill Tatman 14669 Presilla Drive Jamul, CA 91935
Carol Tatum 13577 Vista Sage Lane Jamul, CA 91935	Jolly and Pat Terry 1833 Honey Springs Road Jamul, CA 91935	Pat Terry 1833 Honey Springs Road Jamul, CA 91935
Mark R. Thomas P.O. Box 1294 Jamul, CA 91935	Kenneth Tibbot 15766 Lyons Valley Road Jamul, CA 91935	Rolf and Illean Trautwein 14674 Presilla Drive Jamul, CA 91935
Gregory Tyree 1842 Honey Springs Road Jamul, CA 91935	Enrique Valenzuela 14013 Las Palmas Road Jamul, CA 91935	Marisela Vazquez 14061 Campo Road Jamul, CA 91935
Connie Via 13571 Vista Sage Lane Jamul, CA 91935	Joseph Via 13571 Vista Sage Lane Jamul, CA 91935	Webb & Carey 403 W. Broadway Suite 680 San Diego, CA 92101-8504
Patrick Webb 401 West Broadway San Diego, CA 92101	Patrick Webb 14453 Rancho Jamul Drive Jamul, CA 91935	Debra Webb 14794 Presilla Drive Jamul, CA 91935
John Weekly 13566 Vista Sage Jamul, CA 91935	Dan and Connie Wemple 1843 Honey Springs Road Jamul, CA 91935	Debbie Wermers 3201 Armagosa Way Jamul, CA 91935
John Wheeler 17909 Mark Lee Drive Jamul, CA 91935	Howard Whitfield 14781 Vista la Quebrada Jamul, CA 91935	Steve Wilcuts 14827 Presilla Drive Jamul, CA 91935
Dana Yenawine 2776 Vista del Piedra Jamul, CA 91935	Dana Yenawine P.O. Box 575 Jamul, CA 91935	Ramos Living Trust P.O. Box 551 Chula Vista, CA 91912
Spring Valley Sanitation District 5560 Overland Avenue, Ste. 410 San Diego, CA 92123	Ranch Feed and Supply 12868 Campo Road Spring Valley, CA 91978	Steele Canyon Produce 12869 Campo Road Spring Valley, CA 91978
Jamul Flowers 12883 Campo Road Spring Valley, CA 91978	Bravo Café 12887 Campo Road Spring Valley, CA 91978	7-Eleven 12918 Campo Road Spring Valley, CA 91935
Robert Alvarez 1219 Sloan Canyon Road Jamul, CA 91935	Laura Baret 12856 Campo Road Spring Valley, CA 91978	Helen and Stephen Comer 14904 Presilla Drive Jamul, CA 91935
Edward and Mary Cruz 15517 Lyons Valley Road Jamul, CA 91935	Danielle Hines 14365 Olive Vista Jamul, CA 91935	James Harmon 14365 Olive Vista Jamul, CA 91935
Nathan Hines 12891 Campo Road Spring Valley, CA 91978	Angela and Kip Hanzal 13569 Vista Sage Lane Jamul, CA 91935	Michael Harrelson 13789 Calle Del Sol Jamul, CA 91935
Laura Flores 19540 Elena Lane Jamul, CA 91935	Denise Jermyn 8238 Parkway Drive La Mesa, CA 91942	Jorge Lizarraga 3011 Calle Allejandro Jamul, CA 91935

Steve Manson 3145 Kemberly Lane Jamul, CA 91935	Nancy Murrell 13550 Vista Sage Lane Jamul, CA 91935	Lorna S. Odegaard 20019 Deerhorn Valley Road Jamul, CA 91935
Jocelyn Parker 14131 Hillside Drive Jamul, CA 91935	Alison W. Spurgeon 7077 Consolidated Way, #A San Diego, CA 92121	Patrick Sullivan 1857 Honey Springs Road Jamul, CA 91935
Kathleen D. Tyree 1842 Honey Springs Road Jamul, CA 91935	Steve and Bernice Willcuts 14827 Presilla Drive Jamul, CA 91935	Carrie L Witte 14853 Lyons Valley Road Jamul, CA 91935
Law Offices of Stephan Volker 436 14th Street, Suite 1300 Oakland, CA 94612	Darren Gretler County of San Diego 5510 Overland Avenue, Suite 310 San Diego, CA 92123	Jamul Dulzura Community Planning Group P.O. Box 613 Jamul, CA 91935
Deerhorn Valley Community Association P.O. Box 862 Jamul, CA 91935	Jamul Action Committee P.O. Box 1317 Jamul, CA 91935	

APPENDICES

Appendix A:

Title VI Policy Statement

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE DIRECTOR
P.O. BOX 942873, MS-49
SACRAMENTO, CA 94273-0001
PHONE (916) 654-5266
FAX (916) 654-6608
TTY 711
www.dot.ca.gov

Flex your power!
Be energy efficient!

March 2013

NON-DISCRIMINATION POLICY STATEMENT

The California Department of Transportation, under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person in the State of California shall, on the grounds of race, color, national origin, sex, disability, religion, sexual orientation, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.

For information or guidance on how to file a complaint based on the grounds of race, color, national origin, sex, disability, religion, sexual orientation, or age, please visit the following web page: http://www.dot.ca.gov/hq/bep/title_vi/t6_violated.htm.

Additionally, if you need this information in an alternate format, such as in Braille or in a language other than English, please contact the California Department of Transportation, Office of Business and Economic Opportunity, 1823 14th Street, MS-79, Sacramento, CA 95811. Telephone: (916) 324-0449, TTY: 711, or via Fax: (916) 324-1949.

MALCOLM DOUGHERTY
Director

Appendix B:

Environmental Commitments Record

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Design Kick Off		Design			
Environmental PS&E Review		Design			
Pre-Construction Meeting		Pre-Construction			
Transfer Resident Engineer Book		Pre-Construction Meeting			
Pre-Job Meeting		Construction			
Environmental Compliance Review		Pre-Construction			
Design Feature Memorandum		Post-Construction			
Permits and Approvals					
U.S. Fish and Wildlife Service					
Section 7 Consultation - Threatened and Endangered Species		Pre-Construction			
U.S. Army Corps of Engineers					
Section 404 Permit		Pre-Construction			
California Department of Fish and Wildlife					
1602 Streambed Alteration Agreement		Pre-Construction			
Regional Water Quality Control Board					
Section 401 Water Quality Certification		Pre-Construction			
Traffic and Transportation / Pedestrian and Bicycle Facilities					
Alternatives 1 - 3					
Prepare a TMP to minimize motorist delays when implementing projects or performing other activities on the State Highway. The goals of the TMP are as follows:	Pg. 2.4-69	Construction			
Reduce traffic delay or time spent in the queue to less than 15 minutes above normal recurring traffic delay,	Pg. 2.4-69	Construction			
Maintain traffic flow throughout the corridor and the surrounding areas,	Pg. 2.4-69	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Maintain existing transit operations, and	Pg. 2.4-69	Construction			
Provide a safe environment for the work force and motoring public.	Pg. 2.4-69	Construction			
Below are strategies that would be implemented as part of the TMP:	Pg. 2.4-69	Construction			
A Public Awareness Campaign (PAC): The purpose of this is to provide advance roadway information to the public and provide an opportunity for the public to plan travel within the affected areas during construction periods. This will include news releases distributed to media outlets and nearby emergency services, radio ads and paid advertising, and a project website with information about new project developments, temporary closures, and photos.	Pg. 2.4-69	Construction			
Use of portable changeable message signs: Portable changeable message signs will be placed at key locations to notify motorists of lane closures, detour routes, expected delays, and upcoming road closures. These signs will also inform drivers of speed limit reductions and enforcement activities in a work zone.	Pg. 2.4-70	Construction			
Use of ground mounted signs: Temporary conventional signs will be mounted in the ground to provide traveler information to guide motorists through the work zone.	Pg. 2.4-70	Construction			
Use of Caltrans Highway Information Network and SANDAG 5-1-1 traffic services: Work zone-related information, static (project dates) or real-time (potential delays) or both, using technology such as cellular telephones, pagers, in-vehicle systems, and e-mail notifications will be provided.	Pg. 2.4-70	Construction			
Use of Construction Zone Enhanced Enforcement Program: The project will contract with the California Highway Patrol (CHP) to provide enhanced enforcements services in work zones through the construction phasing.	Pg. 2.4-70	Construction			
Traffic Management Team: A team will be assembled to manage traffic during incidents and planned lane closure activities.	Pg. 2.4-70	Construction			
Construction Staging: A sequence of construction activities will be prepared with specifications that will identify portions of the project to be completed in a specific sequence to minimize impacts to the traveling public.	Pg. 2.4-70	Construction			
Traffic Handling Plans: Plans will be prepared containing alignment details, profiles and typical cross-sections to guide traffic through the work zone in the sequence shown in the construction staging plan.	Pg. 2.4-70	Construction			
Lane Requirement Charts: Charts will be prepared for the contractor identifying the number of lanes that must be open for traffic each hour of the day to minimize delay when work activities are being conducted.	Pg. 2.4-70	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Use of Lane Modifications: Traffic lane modifications will be used to maintain the existing number of travel lanes to the extent possible. Special consideration will be given to accommodate extra-high and extra-wide trucks where possible.	Pg. 2.4-70	Construction			
Use of Delay Clauses: Incentive/disincentive clauses will be used within the project's specifications for the contractor to minimize the overall construction duration of the project.	Pg. 2.4-71	Construction			
Coordination with Other Projects and Special Events: An effort will be made to combine, coordinate and stage the project phases within SR-94 to minimize a combined impact on the motoring public and community caused by other projects or special events.	Pg. 2.4-71	Construction			
Work hours limited to off-peak periods, nights or weekends: Allowable work windows will be determined to minimize work zone impacts on motorists and adjacent businesses. Consideration will be given to potential impacts to residents due to noise.	Pg. 2.4-71	Construction			
Speed Limit Reductions within the work zone: A reduced speed limit from 55 miles per hour to 45 miles per hour will be implemented within work areas to improve traffic and worker safety within the work zone.	Pg. 2.4-71	Construction			
Parking associated with construction workers would be provided within the project footprint and managed by the contractor depending on each phase of construction.	Pg. 2.4-71	Construction			
Sidewalk or pedestrian path closures would be temporary in nature and pedestrian detours would be provided during the sidewalk or pedestrian closures. Changes to the sidewalks in the vicinity of the affected roads would be ADA compliant.	Pg. 2.4-71	Construction			
The traffic control set-ups to be used for each stage of construction would accommodate bicycle traffic per the latest California Manual on Traffic Control Devices and Caltrans Traffic Operations approval.	Pg. 2.4-71	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Visual / Aesthetics					
Alternatives 1 - 3					
Retaining Walls					
The heights of retaining walls should be minimized to the lowest height feasible. The exposed surface of the wall should have a finish blending with the natural colors and textures of the rural valley. Retaining walls should be required to have a semi-consistent, rough, natural appearance, with an undefined top edge and vertical sides to provide an 'unfinished' edge. No vertical bands should be placed on the face of the wall surface. Supplemental highway planting should be used where possible to soften the appearance or screen the walls from neighboring developments. All structural features developed with the Project should receive architectural treatment consistent with an approved aesthetic concept plan. The Project features would complement a design theme established for the corridor during the design development phase.	Pg. 2.6-24	Design			
Wall Alignment and Profile (Terrain Contoured). The Project should use retaining walls with long radius curves and battered faces compatible with surrounding topography. Retaining walls that follow the contours of the proposed topography and maintain a sloped elevation at the top of the wall lessen visual impacts. The proposed wall layout alignment and profile should consist of long radius curves without tangents or points of intersection. Wall faces should complement the angles, textures and features of the surrounding natural land features (soil texture and color, boulder outcroppings).	Pg. 2.6-24	Design			
Cut Section. Where ROW is available, walls should be located at mid-slope and visually compatible with the surrounding terrain. Retaining wall constructed within the highway ROW should meet Caltrans standards. When ROW is available, wall alignment should occur at mid-slope allowing sufficient horizontal space for supplemental highway planting.	Pg. 2.6-25	Design			
Top-of-Slope Retaining Wall In-fill Sections. When ROW is available, retaining walls located at top-of-slope fill sections should provide buffer areas for vegetative screening between the wall and open space areas.	Pg. 2.6-25	Design			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Color and Texture: Proposed retaining walls along SR-94 between Melody Road and Reservation Road (Key Views 1-5) should have a decorative texture and color with an aesthetic complementing the context of the rural surroundings. The color should match the hue of the native soil and/or boulder outcropping. This minimization measure should be employed with any Alternative.	Pg. 2.6-25	Design			
Concrete Barriers					
Unless necessary for safety requirements, concrete barriers should not be fabricated at the base of retaining walls. Barriers should not be needed on retaining walls installed at mid-slope conditions.	Pg. 2.6-25	Design			
Metal Beam Guard Rails with Patina					
Metal beam guard rails with patina should be used for any of the proposed guard rails along the SR-94 and Melody Road corridors (Key Views 1-5). The metal surface of the beam should be chemically treated to develop a 'patina' finish, a weathered look that may be a more contextual color than the standard gray metal. This minimization measure should be employed with all Access Alternatives requiring metal beam guard rails, upon approval for use.	Pg. 2.6-25	Design			
Replacement Highway Planting (Native)					
Replacement highway planting with native species and local genotype should be provided with all Access Alternatives, including a vegetative cover of native shrubs and/or groundcover planting in all areas disturbed by the Proposed Project. The replacement planting should have an aesthetic complementing the context of the local native plant material community.	Pg. 2.6-25	Design			
Replacement Trees					
Along SR-94 and Melody Road corridor (Key Views #1, #2, #5). New trees (native species and local genotype) should be provided to replace any existing trees removed from within the Project area to provide screening of proposed improvements and to help reduce the scale of the widened roadway and heights of retaining walls. This minimization measure should be employed with all Project Access Alternative.	Pg. 2.6-26	Design			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Cultural Resources					
Alternatives 1 - 3					
The two noted Environmentally Sensitive Areas (ESAs) shall be delineated on plans and layout sheets. Within the boundaries of the ESAs, as indicated on the Proposed Project plans, or where designated by the Resident Engineer, no construction or related activities that involve ground disturbance are permitted.	Pg. 2.7-4	Design			
Preconstruction Meeting: All responsible parties will ensure that ESAs are discussed during the preconstruction meeting. The importance of ESAs will be discussed with construction personnel and it will be stressed that no construction activity (including storage or staging of equipment or materials) should occur within the ESAs and that workers must remain outside of the ESAs at all times. Additionally, personnel will be informed of historic preservation laws that protect archaeological sites against any disturbance or removal of artifacts. Any Proposed Project-related personnel that for any reason do not attend this educational meeting will be informed by the Contractor about the ESAs and said required avoidance.	Pg. 2.7-4	Pre-Construction			
ESA temporary fencing will be installed by hand around the sites. The fencing will be installed at least one calendar week prior to initiating any work in those areas. The Consultant Archaeologist will coordinate this activity with the Contractor, the Environmental Construction Liaison and Resident Engineer, and be present to supervise and monitor fence installation, along with a JIV Tribal monitor. A photographic record of the newly installed ESA fence will be documented by the Consultant Archaeologist. The Consultant Archaeologist and the Environmental Construction Liaison will conduct a weekly inspection to ensure the integrity of the ESA.	Pg. 2.7-5	Construction			
Contractor will notify Engineer and Consultant Archaeologist at least 5 days prior to any work adjacent to ESA.	Pg. 2.7-5	Construction			
Monitoring will be conducted by an archeologist(s) under the supervision of the Consultant Archaeologist and by a JIV Tribal Monitor(s) of all earth-disturbing activities in proximity to the ESAs and of all earth-disturbing activities in native soils/sediments within the PAL. The Contractor will coordinate this activity with the Consultant Archaeologist.	Pg. 2.7-5	Construction			
The archaeological monitor has the authority to halt construction within the vicinity of unanticipated cultural discoveries.	Pg. 2.7-5	Construction			
Weekly monitoring summaries will be sent via email by the Consultant Archaeologist to the Resident Engineer.	Pg. 2.7-5	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.	Pg. 2.7-5	Construction			
Halt construction if significant or potentially significant cultural resources are exposed or adversely affected by construction activities outside the ESA boundaries. The Contractor and the Engineer shall halt work in the vicinity of the deposit, and the Consultant Archaeologist will follow Stipulation XV.B of the 2014 First Amended Section 106 Programmatic Agreement for Post Review Discoveries.	Pg. 2.7-5	Construction			
Should human skeletal material be uncovered, Contractor's construction activities within 20 meters (66 feet) of the find shall be halted, and not resumed until permitted in writing, by Engineer.	Pg. 2.7-6	Construction			
Should human skeletal material be uncovered, Consultant Archaeologist or Contractor will notify Engineer. Consultant Archaeologist will be responsible for notifying and consulting regarding treatment with the County Coroner, Native American Heritage Commission (NAHC), State Historic Preservation Officer (SHPO), Federal Highway Administration (FHWA) and Native Americans, as appropriate. If human remains are discovered, State Health and Safety Code Section 7050.5 states that all activities shall stop in all areas suspected to overlie remains, and the County Coroner shall be contacted. Pursuant to PRC Section 5097.98, if the remains are thought to be Native American, the Coroner would notify the NAHC, which would then notify the Most Likely Descendent (MLD). The person who discovered the remains would contact the Consultant Archaeologist so that they may work with the MLD on respectful treatment of the remains. Further provisions of PRC Section 5097.98 are to be followed as applicable.	Pg. 2.7-6	Construction			
The Environmental Construction Liaison will inform the Consultant Archaeologist when construction is complete. The Contractor, under supervision of the Environmental Construction Liaison and/or Consultant Archaeologist, will remove temporary fencing at the conclusion of construction. The JIV Tribal monitor and Consultant Archaeologist will monitor fence removal.	Pg. 2.7-6	Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Water Quality and Stormwater Runoff					
Alternatives 1 - 3					
The construction contractor is required to follow the procedures outlined in the California Department of Transportation (Caltrans) Storm Water Quality Handbooks, Project Planning and Design Guide (July 2010 or subsequent issuance) for implementing Design Pollution Prevention and Treatment BMPs for the project. This will include coordination with the San Diego RWQCB with respect to the feasibility, maintenance, and monitoring of Treatment BMPs as set forth in Caltrans Statewide Storm Water Management Plan (SWMP, May 2003 or subsequent issuance). The construction contractor is also required to comply with other provisions identified in the NPDES Permit, Statewide Storm Water Permit, and Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003 or subsequent issuance).	Pg. 2.9-11	Construction			
Temporary Construction BMPS					
BMPs used to prevent, reduce, or treat stormwater pollution would be implemented and maintained both before and during the construction phase of the Proposed Project. The combination of the proposed construction and post-construction BMPs would reduce the expected pollutants and would not adversely impact the beneficial uses or water quality of the receiving waters downstream. Prior to initiating any construction activities, the developer would prepare and provide a SWPPP to Caltrans for review and approval. A copy of the approved SWPPP would be kept at the construction site as a reference for regular maintenance and inspection actions. The SWPPP would detail how stormwater pollution will be prevented, reduced and/or treated to ensure that the water quality and beneficial uses of receiving waters will not be adversely impacted, including but not limited to the use of the of the following construction BMPs from the Caltrans Stormwater Quality Manual for construction site BMPs that would be implemented based on site specific conditions.	Pg. 2.9-12	Design/ Construction			
Soil Stabilization Measures – Temporary soil stabilization consists of preparing the soil surface and applying one or combination thereof, of the following BMPs based on site specific conditions:	Pg. 2.9-12	Design/ Construction			
Scheduling - This BMP involves developing a schedule that includes sequencing of construction activities with the implementation of construction site BMPs.	Pg. 2.9-12	Design/ Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Preservation of Existing Vegetation - Preservation of existing vegetation is the identification and protection of desirable vegetation that provides erosion and sediment control benefits.	Pg. 2.9-12	Design/ Construction			
Hydraulic Mulch - Hydraulic mulch consists of applying a mixture of shredded wood fiber or a combination of other soil stabilizers with hydroseeding equipment, which temporarily protects exposed soil from erosion by raindrop impact or wind.	Pg. 2.9-12	Design/ Construction			
Hydroseeding - Hydroseeding consists of applying a mixture of wood fiber, seed, fertilizer, and stabilizing emulsion with hydro-mulch equipment, which temporarily protects exposed soils from erosion by water and wind.	Pg. 2.9-12	Design/ Construction			
Soil Binders - Soil binders consist of applying and maintaining a soil stabilizer to exposed soil surfaces. Soil binders are materials applied to the soil surface to temporarily prevent water-induced erosion of exposed soils on construction sites.	Pg. 2.9-13	Design/ Construction			
Straw Mulch - Straw mulch consists of placing a uniform layer of straw and incorporating it into the soil with a studded roller or anchoring it with a stabilizing mixture.	Pg. 2.9-13	Design/ Construction			
Geotextiles, Plastic Covers, and Erosion Control Blankets/Mats – This BMP involves the placement of geotextiles, mats, plastic covers, or erosion control blankets to stabilize disturbed soil areas and protect soils for erosion by wind or water.	Pg. 2.9-13	Design/ Construction			
Wood Mulching - Wood mulching consists of applying a mixture of shredded wood mulch, bark or compost.	Pg. 2.9-13	Design/ Construction			
Sediment Control Measures - Temporary sediment control practices include those practices that intercept and slow or detain the flow of storm water to allow sediment to settle and be trapped. These practices can consist of installing temporary linear sediment barriers (such as silt fences, sandbag barriers, and straw bale barriers); providing fiber rolls, gravel bag berms, or check dams to break up slope length or flow; or constructing a temporary sediment/desilting basin on a sediment trap.	Pg. 2.9-13	Design/ Construction			
Tracking Control - Tracking control consists of preventing or reducing vehicle tracking (dirt or sediments on the tires) from entering a storm drain or watercourse.	Pg. 2.9-13	Design/ Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Non-storm Water Management Measures - Non-stormwater management BMPs are source control BMPs that prevent pollution by limiting or reducing potential pollutants at their source before they come in contact with storm water. These practices involve day-to-day operations of the construction site and are usually under the control of the Contractor. These BMPs are also referred to as "good housekeeping practices", which involve keeping a clean, orderly construction site.	Pg. 2.9-13	Design/ Construction			
Storm Water Sampling and Analysis – Stormwater sampling helps determine whether the BMPs employed on a construction site are effective in controlling potential construction site pollutants from leaving the site and causing or contributing to an exceedance of water quality objectives in the receiving waters.	Pg. 2.9-13	Design/ Construction			
Long Term Operational BMPS					
Site Design BMPs: Site design BMPs aim to conserve natural areas and minimize impervious cover, especially impervious areas directly connected to receiving waters, to maintain or reduce increases in peak flow velocities from the Proposed Project site. Site Design BMPs for the Proposed Project include:	Pg. 2.9-14	Design			
All vegetation outside of the work limits would be preserved to provide the maximum erosion and sediment control benefits practicable.	Pg. 2.9-14	Design			
Permanent erosion control would include native re-vegetation. Hydroseed mixes for slopes and vegetation for swales will be specified during design.	Pg. 2.9-14	Design			
Hard surfaces for the Proposed Project drainage design will consist of rock slope protection (RSP) at the end of pipe outlets.	Pg. 2.9-14	Design			
Concentrated flow conveyance systems such as ditches, dikes, swales, overside drains, and outlet protection/velocity dissipation devices are proposed for this Proposed Project to intercept and convey surface flows to minimize soil erosion. Dikes route the runoff to existing and proposed drainage inlets. Outlet protection/velocity dissipation BMPs are placed at all outlets of drainage systems that discharge into earthen areas.	Pg. 2.9-14	Design			
Treatment BMPs: Post-construction treatment control stormwater management BMPs treat stormwater emanating from the Proposed Project site. The NPDES General Permit requires the use of post-construction BMPs that will remain in service to protect water quality throughout the life of the Proposed Project. The SWDR would include the following Treatment BMPs for the Proposed Project:	Pg. 2.9-14	Design			
Biofiltration Swales would be incorporated throughout the Proposed Project to ensure treatment of 100% of the equivalent net increase impervious area.	Pg. 2.9-14	Design			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
A single Checklist T-1, Part 2 would be completed for the proposed biofiltration swales.	Pg. 2.9-14	Design			
Each biofiltration swale would be designed to meet treatment requirements and conveyance criteria per HDM Chapter 800. The water quality flow rate, hydraulic residence time, and depth for each bioswale would be determined for each bioswale prior to construction.	Pg. 2.9-14	Design			
Geology / Soils / Seismicity / Topography					
Alternatives 1 - 3					
Seismic Hazards					
Prior to construction, the Geotechnical Engineer of Record would prepare a GDR for review and approval by Caltrans Geotechnical specialists. The GDR should include a plan to address potential ground movement and failure. The plan would provide specific provisions to avoid or minimize damage from ground movement, and the specific performance standards, based on the prevailing design standard (e.g., Highway Design Manual, California Building Code, etc.) that must be met for work to continue in that area. The Plan would include a program requiring periodic surveying for ground movement, where the Geotechnical Engineer's representative determines that potential for ground movement and failure may exist. The GDR shall incorporate the following recommendations from the Preliminary Geotechnical Report to ensure seismic stability of the Proposed Project:	Pg. 2.10-6	Design/ Construction			
All construction of retaining walls would adhere to the requirements of the Caltrans Guidelines for the Preparation of Geotechnical Design Reports for Earth Retaining Systems regarding the design of the retailing wall including the materials used, maximum height, and construction method.	Pg. 2.10-7	Design/ Construction			
Stabilize areas before fill placement or paving. Stabilization methods may include complete excavation and replacement, and/or installation of a fabric or geo-grid for additional stabilization. The depth and extent of required soil removal and remedial repair would be reviewed and approved in the field by an on-site geotechnical engineer based on the final Geotechnical Report prepared for the final engineering design.	Pg. 2.10-7	Design/ Construction			
Determine the presence of groundwater using site-specific subsurface investigations at locations determined by the Proposed Project Geotechnical Engineer of Record. The effects of groundwater would be incorporated into temporary slope design on a case-by-case basis.	Pg. 2.10-7	Design/ Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Hazardous Waste / Materials					
Alternatives 1 - 3					
If contaminated soil or groundwater, or a buried hazardous material storage container, is encountered during Proposed Project construction, work would be halted in that area, and the type and extent of the contamination should be identified and characterized by qualified professionals. A qualified professional, in consultation with regulatory agencies, would then develop an appropriate method to remediate the contamination. As deemed necessary by the regulatory agency, a remediation plan would be implemented in conjunction with continued Proposed Project construction.	Pg. 2.11-7	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
As deemed necessary by the regulatory agency, an Environmental Contaminant Health and Safety Plan (HASP) would also be created and implemented before construction resumes. The HASP would be prepared for the construction process by a qualified professional, consistent with general industry standards and the Occupational Safety and Health Administration, and would address any risks to construction personnel and public safety. This site-specific HASP would describe in detail the health and safety guidelines, procedures, and work practices that must be adhered to and the work to be performed, and would also include special details governing certain work, such as working in confined spaces. Should contaminants be found, appropriate measures would be taken to mitigate potential effects. This may include excavation of contaminated soils and disposal at an appropriate facility. The HASP would also address appropriate personal protective equipment (PPE), monitoring to protect on-site workers (if contamination or storage tanks are encountered), and the appropriate level of worker training (e.g., Hazardous Waste Operations and Emergency Response training). Monitoring may -include visual and olfactory observation (e.g., soil staining or unusual odors), or air monitoring with hand-held devices (e.g., photo-ionization detector) to detect volatile hydrocarbons. In addition, health-risk based action levels would be identified for applicable contaminants that would trigger modifications to work practices. Work practice modifications may include the cessation of construction activities until soil or groundwater sampling is performed, or an increase in the level of PPE or worker training. A Sampling and Analysis Plan would accompany the HASP to determine if constituents of concern are present and at what concentrations. The HASP would also address procedures to follow if unknown objects (e.g., USTs and associated piping) are encountered, and the use of specialized contractors to decommission and remove such USTs and perform confirmation sampling.	Pg. 2.11-7	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
No soil would be disturbed or exported from within the PSA before an ADL study is completed and a lead compliance plan is implemented. No paint striping would be removed before a lead compliance plan is implemented. The potential presence of elevated lead concentrations requires sampling and analytical testing of any exported soil and any traffic paint materials to determine appropriate health and safety procedures and proper management and disposal practices. A Project-specific Lead Compliance Plan would be required and must be prepared by a Certified Industrial Hygienist and properly implemented by the contractor. The requirements for the lead compliance plan can be found in the Caltrans Standard Specifications in Section 7-1.02K(6)(j)(ii) and CCR Title 8, Section 1532.1. Note that just one lead compliance plan that addresses all types of lead exposures on the Proposed Project is to be prepared. As specified in this plan, lead-containing materials must be sampled and analyzed prior to disposal. If the analytical results show that lead levels are below the regulated hazardous level the materials may be disposed with other construction and demolition debris. If the analytical results show that lead levels are above the regulated hazardous level, the waste must be transported under manifest to a Class I landfill appropriately permitted to receive the material. The Project-specific Lead Compliance Plan is intended, among other things, to minimize worker exposure to lead. The plan would include protocols for environmental and personnel monitoring, requirements for the use of personal protective equipment, and other health and safety protocols and procedures for the handling of lead-containing materials. The plan would also include a dust control plan and health and safety plan to minimize worker exposure to lead and any other hazardous materials.	Pg. 2.11-8	Construction			
The DTSC requires that TWW either be disposed of as a hazardous waste if test results classify it as such, or if not tested, the generator may presume that TWW is a hazardous waste (to avoid the time and expense involved in completing laboratory testing) and manage the waste by Alternative Management Standards (AMS). The AMS are described in the California Code of Regulations, Title 22, Division 4.5, Chapter 34. The AMS lessen storage requirements, extend accumulation periods, allow shipments of presumed hazardous waste TWW without manifests and registered hazardous waste haulers, and permit disposal at specific non-hazardous waste landfills. Note that treated wood that is disturbed but is not considered a waste, must not be recycled or salvaged off of the Proposed Project site.	Pg. 2.11-9	Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Air Quality					
Alternatives 1 - 3					
Minimize, to the maximum extent feasible, land disturbance,	Pg. 2.12-16	Construction			
Use watering trucks to minimize dust; watering should be sufficient to confine airborne dust to the Project work areas,	Pg. 2.12-16	Construction			
Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent airborne dust,	Pg. 2.12-16	Construction			
Cover all trucks hauling dirt when traveling at speeds greater than 15 miles per hour,	Pg. 2.12-17	Construction			
Stabilize the surface of dirt piles if not removed within two days,	Pg. 2.12-17	Construction			
Limit vehicular paths on unpaved surfaces and stabilize any temporary roads,	Pg. 2.12-17	Construction			
Minimize unnecessary vehicular and machinery activities,	Pg. 2.12-17	Construction			
Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway,	Pg. 2.12-17	Construction			
Revegetate disturbed land, including vehicular paths created during construction, to avoid future off-road vehicular activities,	Pg. 2.12-17	Construction			
Remove on-site construction materials that remain unused after the Proposed Project is constructed, and	Pg. 2.12-17	Construction			
Locate construction equipment and truck staging and maintenance areas as far as feasible and downwind of schools, active recreation areas, and other areas of high population density.	Pg. 2.12-17	Construction			
Noise					
Alternatives 1 - 3					
Do not exceed 86 dBA L_{max} at 50 feet from the job site activities from 9 p.m. to 6 a.m. Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler,	Pg. 2.14-11	Design/ Construction			
Each internal combustion engine would be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine would be operated on the Proposed Project without said muffler,	Pg. 2.14-11	Design/ Construction			
Staging areas would be located at least 250 feet from occupied residences. Work in staging areas that generate loud noises, such as equipment maintenance, would not be allowed on-site between the hours of 10:00 p.m. and 7:00 a.m.,	Pg. 2.14-12	Design/ Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
If traffic control and construction signs that require power for lighting or flashing are located within 500 feet of residential units, the source of power would be batteries, solar cells, or another quiet source. Gas- or diesel-fueled internal combustion engines would not be used in these instances, and	Pg. 2.14-12	Design/ Construction			
Except as required for safety, pavement breaking activities would be restricted to the hours of 7:30 a.m. to 7:00 p.m. Monday through Friday and would not be allowed on Saturdays, Sundays, or holidays.	Pg. 2.14-12	Design/ Construction			
Energy					
Alternatives 1 - 3					
Use recycled materials, such as asphalt and concrete roadway materials through creation of road-base materials after crushing and grinding,	Pg. 2.15-3	Design/ Construction			
Salvage material such as roadside sign posts, and sign structures, chain link fence fabric, lighting standards, and/or traffic signal standards and appurtenances,	Pg. 2.15-3	Design/ Construction			
Use energy-efficient construction vehicles to the extent feasible,	Pg. 2.15-3	Design/ Construction			
Use LED lights in traffic signals and pedestrian modules,	Pg. 2.15-3	Design/ Construction			
Incorporate low water use landscaping, and	Pg. 2.15-3	Design/ Construction			
Develop and implement a comprehensive TMP to increase driver awareness, ease congestion, and minimize delay during construction.	Pg. 2.15-3	Design/ Construction			
Natural Communities					
Temporary Impacts					
Alternatives 1 - 3					
All areas experiencing temporary impacts from construction activities would be restored to their original condition. Restoration would include, as necessary, re-establishing the existing contours and replacement of lost topsoil, soil aeration, replanting with identical native vegetation and supplemental watering and weed maintenance to ensure native plant re-establishment.	Pg. 2.16-10	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
All cut-and-fill slopes would be revegetated with native vegetation. These slopes would have temporary irrigation and be planted with native container plants and seeds of similar composition as the adjacent natural habitats. All vegetation would be monitored and maintained on these slopes to ensure successful establishment and control invasive weeds. Vegetation restoration implementation and monitoring will conform to the County's Land Use and Environment Group guidelines for revegetation plans.	Pg. 2.16-10	Design/ Construction/ Post-Construction			
To avoid incidental loss of adjacent sensitive habitat types during construction activities, environmentally sensitive area (ESA) fencing would be installed along the limits of the Proposed Project prior to the start of construction, and construction activities would not occur beyond this fencing. Construction crews would be made fully aware of this boundary and would be instructed to avoid these environmentally sensitive areas.	Pg. 2.16-10	Design/ Construction/ Post-Construction			
Permanent Impacts					
Alternatives 1 - 3					
SR-94/Lyons Valley Road Intersection: The land preservation requirements are 0.2 acre of coast live oak riparian forest, which the applicant would fulfill either by an in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as areas on the 87-acre parcel that are designated hardline preserve).	Pg. 2.16-10	Design/ Construction/ Post-Construction			
SR-94/Maxfield Road Intersection: The land preservation requirements are 1.4 acres of Diegan coastal sage scrub, which the applicant would fulfill either by an in-lieu-fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as areas on the 87-acre parcel that are designated hardline preserve).	Pg. 2.16-10	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Alternative 1; Reservation Road Access:					
The applicant would comply with the land preservation requirements of 1.43 acres of grassland, 0.10 acres of coastal sage scrub, and 0.66 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (1.80 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 5.40 acres of new preserve lands. To develop the 0.41 acres of land that has the MSCP designation of "Hardline" Preserve, the County would need to approve a boundary line adjustment of the MSCP plan area. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.	Pg. 2.16-11	Design/ Construction/ Post-Construction			
Preferred Alternative - Alternative 2; Option 1 Full Footprint:					
The applicant would comply with the land preservation requirements of 0.65 acres of grassland and 0.33 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (1.06 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 3.18 acres of new preserve lands. To develop the 0.63 acres of land that has the MSCP designation of "Hardline" Preserve and 0.33 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.	Pg. 2.16-11	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Alternative 2; Option 2 Reduced Footprint:					
The applicant would comply with the land preservation requirements of 1.23 acres of grassland and 0.75 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (1.04 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 3.12 acres of new preserve lands. To develop the 0.05 acres of land that has the MSCP designation of “Hardline” Preserve and 0.49 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.	Pg. 2.16-11	Design/ Construction/ Post-Construction			
Alternative 2; Option 3 Minimum Footprint:					
The applicant would comply with the land preservation requirements of 0.11 acres of grassland and 0.09 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (0.08 acres of non-native grassland and urbanized/developed habitat) would require approval from CDFW and the dedication of 0.24 acres of new preserve lands. To develop the 0.02 acres of land that has the MSCP designation of “Hardline” Preserve and 0.06 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.	Pg. 2.16-12	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Alternative 3; Melody Road Access Alignment:					
The applicant would comply with the land preservation requirements of 7.02 acres of grassland and 1.71 acres of riparian forest (using the mitigation ratios specified in the BMO, with all impacted land meeting the requirements of biological resource core area). The additional ROW needed on CDFW preserve lands (0.83 acres of non-native grassland and urbanized / developed habitat) would require approval from CDFW and the dedication of 2.49 acres of new preserve lands. To develop the 3.75 acres of land that has the MSCP designation of "Hardline" Preserve and 1.05 acres that is designated a Pre-Approved Mitigation Area, the County would need to approve a boundary line adjustment of the MSCP plan areas. Other portions of the Proposed Project limits are authorized for take under the MSCP or are not subject to the MSCP because they are in the SR-94 ROW or because they have no natural habitat remaining.	Pg. 2.16-12	Design/ Construction/ Post-Construction			
Wetlands					
Alternatives 1 - 3					
Water Resources					
For improvements to the SR-94/Jamacha Road Intersection, the land preservation/restoration requirement for loss of 0.03 acres of channel, at the 3:1 ratio specified in the Biological Mitigation Ordinance, is 0.09 acres. However, the SR-94/Jamacha Road Intersection Proposed Project limits are located within two overlapping County mitigation areas ([Final EIR] Figure 2.14-3): a wetland enhancement area and a least Bell's vireo habitat enhancement area. The compensation ratio is doubled for impacts occurring within existing mitigation areas. Thus, the applicant would comply with the land preservation requirements of 0.18 acres.	Pg. 2.17-7	Design/ Construction/ Post-Construction			
For improvements to the SR-94/Lyons Valley Road Intersection, the land preservation/restoration requirement for loss of 0.1 acre of riparian habitat, at the 2:1 ratio specified in the Biological Mitigation Ordinance, is 0.2 acre.	Pg. 2.17-7	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
For implementation of Alternative 1, Alternative 2 Option 2, Alternative 2 Option 3, or Alternative 3, the land preservation/restoration requirements for loss of 0.20 to 0.10 acre of channel, is 0.06 to 0.3 acre. The land preservation/restoration requirement for loss of 0.03 to 0.57 acre of riparian habitat is 0.06 to 1.14 acre.	Pg. 2.17-7	Design/ Construction/ Post-Construction			
For implementation of the Alternative 2 Option 1, the land preservation/restoration requirement for loss of 0.11 acre of riparian habitat is 0.22 acre. In order to avoid all permanent impacts to the Willow Creek channel at Melody Road, the existing culvert and other fill would be removed and replaced with a bottom-less culvert that does not require any fill or foundations within the channel. This would result in a net gain of waters of the US and waters of the State. No land preservation/restoration requirements are required for the Willow Creek channel because no impacts would occur.	Pg. 2.17-7	Design/ Construction/ Post-Construction			
Create a habitat restoration plan and implement habitat restoration for temporary impacts to riparian vegetation and stream channels at Jamacha Channel (SR-94/Jamacha Road Intersection) and at Willow Creek (Access Road Alignments). The restoration will obligate the applicant to take the following restoration actions: (a) native riparian plants would be planted; and (b) those plants would be actively maintained for 3 years to ensure successful establishment and control invasive weeds.	Pg. 2.17-7	Design/ Construction/ Post-Construction			
Obtain the following permits to install a retaining wall at Jamacha Channel (SR-94/Jamacha Road Intersection) and to install retaining walls and a bottomless culvert at Willow Creek under Melody Road (Access Road Alignments):	Pg. 2.17-7	Pre-Construction			
CWA Section 404 Nationwide Permit from USACE,					
Section 401 Water Quality Certification from the RWQCB, and					
Fish and Game Code Section 1602 Streambed Alteration Agreement from CDFW.					
Enroll in the State Water Quality Control Board's Construction General Permit, which requires the preparation and proper implementation of a SWPPP, Hazardous Materials Management and Spill Response Plan, and related BMPs to protect water quality.	Pg. 2.17-8	Pre-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Plant Species					
Alternatives 1 - 3					
SR-94/Jamacha Road Intersection: Using a 3:1 mitigation ratio as specified in the BMO, and after securing approval of the San Diego County Director of Planning and Development Services, 6,750 square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as on the 87-acre parcel). All stands of Palmer's goldenbush would be transplanted to this preserve area prior to the start of construction of the SR 94/Jamacha Road Intersection improvement. The relocated goldenbush would be monitored and maintained for 3 years to ensure successful re-establishment and to control invasive weeds.	Pg. 2.18-3	Design/ Construction/ Post-Construction			
Alternative 3; Melody Road Access:					
Using a 3:1 mitigation ratio as specified in the BMO, and after securing approval of the San Diego County Director of Planning and Development Services, 72 square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank (such as the Crestridge Conservation Bank) or by deed restriction of qualified lands (such as on the 87-acre parcel). All stands of Palmer's goldenbush would be transplanted to this preserve area prior to the start of construction of the Melody Road Access Road Alignment. The relocated goldenbush would be monitored and maintained for 3 years to ensure successful re-establishment and to control invasive weeds.	Pg. 2.18-3	Design/ Construction/ Post-Construction			
Animal Species					
Alternatives 1 - 3					
Lighting and Noise					
During night-time construction, Proposed Project lighting (e.g., staging areas, equipment storage sites, and roadway) would be directed onto the roadway or construction site and away from sensitive habitat. Light glare shields would also be used to reduce the extent of illumination into adjoining areas, and	Pg. 2.19-6	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Nesting Birds					
Clearing and grubbing of vegetation on lands that may support active nests and construction activities adjacent to nesting habitat would occur outside of the breeding season (February 15 to September 15). If removal of habitat and/or construction activities is necessary on lands adjacent to nesting habitat during the breeding season, the applicant would retain a CDFW-approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 100-feet of the construction area, determine the presence or absence of FESA- or CESA-listed birds (e.g., coastal California gnatcatcher, least Bell's vireo) on or within 300-feet of the construction area, and determine the presence or absence of nesting raptors within 500-feet of the construction area. The pre-construction survey would be conducted within 10 calendar days prior to the start of construction, the results of which would be submitted to USFWS and CDFW, as appropriate, for review and approval prior to initiating any construction activities. If nesting birds are detected by the biologist, the following buffers would be established: no work would occur within 100-feet of a non-listed nesting migratory bird nest; no work would occur within 300-feet of a listed bird nest, and no work would occur within 500-feet of a raptor nest. There may be a reduction of buffer size depending on site-specific conditions (e.g., the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance).	Pg. 2.19-6	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Threatened and Endangered Species					
Alternative 3; Melody Road Access					
Quino Checkerspot Butterfly					
A pre-construction, protocol survey for Quino checkerspot butterfly would be performed to ensure that no protected butterflies have migrated into the Proposed Project limits. If the survey returns positive results, no construction would occur in the affected areas. USFWS would be consulted, and standard mitigation measures would be implemented before any ground disturbance occurs. Butterflies would be passively or actively relocated, and impacts to occupied habitat would be compensated by the preservation of lands containing suitable habitat (or in lieu payments to a mitigation bank) at compensation ratios of 3:1 (as specified in the BMO). Biological monitoring during groundbreaking would also be implemented. Implementation of these mitigation measures would ensure that no mortality of butterflies occurs and that the species would have additional habitat within which to proliferate.	Pg. 2.20-5	Design/ Construction/ Post-Construction			
To compensate for the impacts to 16-square feet of dwarf plantain, and using a 3:1 mitigation ratio as specified in the BMO, 48-square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank such as the Crestridge Conservation Bank or by deed restriction of qualified lands (such as on the 87-acre parcel). Additionally, the impacted stands of dwarf plantain would be transplanted to this preserve area before construction begins. There would be 3 years of plant maintenance to ensure successful establishment and control invasive weeds.	Pg. 2.20-6	Design/ Construction/ Post-Construction			

Task and Brief Description	Ref.	Timing / Phase	Action Taken to Comply/Remarks	Task Completed	
				Initial	Date
Quino Checkerspot Butterfly					
A pre-construction, protocol survey for Hermes copper butterfly would be performed to ensure that no protected butterflies have migrated into the Proposed Project limits. If the survey returns positive results, no construction would occur in the affected areas. USFWS would be consulted, and standard mitigation measures would be implemented before any ground disturbance occurs. Butterflies would be passively or actively relocated, and impacts to occupied habitat would be compensated by the preservation of lands containing suitable habitat (or in lieu payments to a mitigation bank) at compensation ratios of 3:1 (as specified in the BMO). Biological monitoring during groundbreaking would also be implemented. Implementation of these mitigation measures would ensure that no mortality of butterflies occurs and that the species would have additional habitat within which to proliferate.	Pg. 2.20-6	Design/ Construction/ Post-Construction			
To compensate for the impacts to 8 square feet of spiny redberry, and using a 3:1 mitigation ratio as specified in the BMO, 24-square feet of preserve lands would be acquired via an in-lieu fee payment to a mitigation bank such as the Crestridge Conservation Bank or by deed restriction of qualified lands (such as on the 87-acre parcel). Additionally, the impacted stands of spiny redberry would be transplanted to this preserve area before construction begins. There would be 3 years of plant maintenance to ensure successful establishment and control invasive weeds.	Pg. 2.20-6	Design/ Construction/ Post-Construction			
Invasive Species					
Alternatives 1 - 3					
In compliance with the Executive Order on Invasive Species, EO 13112, and guidance from the FHWA, the landscaping and erosion control included in the Proposed Project would not use species listed as invasive.	Pg. 2.21-2	Design/ Construction/ Post-Construction			
For any erosion control techniques involving plant fibers or seed mixes, such as straw wattles or hydroseeding, the contractor must use products that are certified weed free. Before entering or leaving the construction and mitigation sites, equipment would be inspected for evidence of plant residues (seeds, twigs, leaves, etc.). Should any plants residues or seeds be detected, the equipment would be pressure washed to ensure no invasive plant species would be brought into or removed from the site.	Pg. 2.21-2	Design/ Construction/ Post-Construction			

Appendix C:

Letter from the Office of the Governor

OFFICE OF THE GOVERNOR

August 27, 2013

Chairman Raymond Hunter
Jamul Indian Village
PO Box 612
Jamul, CA 91935

Dear Chairman Hunter,

In accordance with Section 10.8.3 of the Tribal-State Gaming Compact between the State of California and the Jamul Indian Village (Compact), I am responding to your letter of August 23, 2013, regarding the Tribe's compliance with its Compact obligations under Section 10.8.2 with respect to the Jamul Indian Village Gaming Facility ("Project").

The State is committed to fulfilling its obligations under the Compact and ensuring that the Tribe is likewise fully compliant. To that end, the State has reviewed the Final Tribal Environmental Evaluation and accompanying Mitigation Monitoring and Reporting Plan approved by the Tribe for the Project. I have also met with you, other members of the Tribal Council, and representatives of the Tribe on approximately 20 occasions during the past three years to review and discuss the Tribe's progress. These meetings have given me a clear understanding of the Tribe's good faith efforts to mitigate significant off-Reservation impacts of the Project.

In the context of monitoring the Tribe's compliance under the Compact, we have had several meetings with the relevant state agencies, including the California Department of Transportation (CalTrans). I have had several opportunities to personally inspect the Project site and tour State Route ("SR") 94 to learn about the intersections and improvements that the Tribe intends to construct or fund to mitigate the Project's significant traffic impacts.

As you are aware, the State supports the Tribe's efforts to mitigate any and all of the significant off-Reservation impacts, provided that such mitigation is consistent with the Compact. It is my understanding the CalTrans and the California Department of Fish and Wildlife are working cooperatively with the Tribe, and will continue to do so, as it seeks necessary approvals to implement the mitigation measures specified in the Final Tribal Environmental Evaluation and Mitigation Monitoring and Reporting Plan.

I have also met with San Diego County Supervisor Dianne Jacob, as well as county staff, to

obtain further information on avenues for cooperation between the Tribe and the County on mitigation measures. I am pleased to learn about your recent meeting with county staff and hopeful that the Tribe and the County can build on the positive aspects of your most recent meeting to reach an agreement that benefits the residents of both jurisdictions.

It is my understanding that the Tribe has complied with its specific obligations under Section 10.8.2(a), which describe the period prior to the commencement of a project, to inform the public of the Project; identify potential adverse off-Reservation environmental impacts; submitting environmental impact reports to the appropriate state and local government agencies; consulting with the board of supervisors; and affording the affected members of the public an opportunity to comment.

Section 10.8.2(b) obligates the Tribe, during the conduct of the Project, to keep the board and potentially affected members of the public apprised of the Project's status, and to make good faith efforts to mitigate any and all such adverse off-Reservation environmental impacts. The Jamul General Council's Resolution 2013-03, "Acceptance/Certification of the Final Tribal Environmental Evaluation for the Jamul Indian Village Gaming Development Project," (Resolution) affirms the Tribe's commitment to mitigating adverse off-Reservation environmental impacts. The Resolution acknowledges that certain mitigation measures are the responsibility and jurisdiction of other governmental agencies. Your letter identifies these measures and projects the costs of undertaking appropriate steps to mitigate the impacts. These cost and measures are identified in the table below.

Description	August 2013 Estimate
Total Cost of Mitigation (Direct CalTrans only)	$5,035,000
Total Cost of Mitigation (Cumulative CalTrans only)	$3,325,000
Traffic Impact Fee[1]	$570,024
Total Cost of Access Improvements (Widening of SR 94 from Melody Road to Project Site)	$7,189,000
Estimated Cost for Right of Way Acquisitions	$204,756
Total Cost	**$16,323,780**

[1] *Fair Share is calculated based on the Jamul-De Laura rate for Commercial Retail use. It assumes a 203,000 square-foot facility.*

If the tribe implements the measures directed by the Resolution, applies for the necessary approvals from the State and County governments, and, prior to the opening day of the Project, deposits into an escrow account for the benefit of the responsible government agencies an amount equal to the amount estimated to construct traffic improvements (to be set forth in the CalTrans Encroachment Permits), plus the Tribe's fair share payments to the State and County to mitigate the Project's considerable traffic impacts, it will have made a good faith effort to mitigate off-Reservation impacts as required by the Compact.

As acknowledged in the Resolution, the Compact obligates the Tribe, during the conduct of the

Project, to keep the board and potentially affected members of the public apprised of the Project's status. We appreciate your efforts to collaborate with State and local governments, and members of the local community, as you develop and implement plans to use your Tribal lands in a manner consistent with Federal law. We will continue to monitor the issue to verify that your commitment to mitigation and exceptional efforts at outreach and transparency do not stop now.

Very Truly Yours,

Jacob A. Appelsmith
Senior Advisor to the Governor

Appendix D:

Acronyms

APPENDIX D
ACRONYMS

ACRONYMS

A	
ADA	Americans with Disabilities Act
ADL	aerially deposited lead
ADT	average daily trips
AMS	Alternative Management Standards
AP	Alquist-Priolo
ARPA	Archaeological Resources Protection Act
ARS	Acceleration Response Spectrum
ASBS	Areas of Special Biological Significance
ASR	Archaeological Survey Report
ASTM	American Society for Testing and Materials
B	
BIA	Bureau of Indian Affairs
BMO	Biological Mitigation Ordinance
BMPs	Best Management Practices
C	
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980
CERFA	Community Environmental Response Facilitation Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CIA	Community Impact Assessment
CIE2	Cieneba loam
cm	centimeters
CmrG	Cieneba very rocky coarse sandy loam
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CPA	Community Plan Area
CRHR	California Register of Historical Resources
CWA	Clean Water Act

D

DGPR	District Preliminary Geotechnical Report
DSA	Disturbed Soil Area
DTSC	Department of Toxic Substance Control

E

EO	Executive Order
EP	Encroachment Permit
ESA	Environmental Site Assessment
Esc	Escondido loam

F

FaD2	Fallbrook loam
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FxG	Friant loam

G

GDR	Geotechnical Design Report

H

HCM	Highway Capacity Model
HCS	Highway Capacity Software
HCWA	Hollenbeck Canyon Wildlife Area
HRCR	Historical Resources Compliance Report

I

ILV	Intersecting Lane Vehicle
IOD	Irrevocable Offer of Dedication

J

JIV	Jamul Indian Village

L

LCSs	lead-containing surfaces
LEDPA	least environmentally damaging practicable alternative
LMP	Land Management Plan
LOS	level of service
LpC2	Las Posas loam

M

MHPAs	Multiple Habitat Planning Areas
MLD	Most Likely Descendent
MLJ	Metropolitan-Lakeside-Jamul
MPH	miles per hour
MSCP	Multi-Species Conservation Plan
MSCP	Multiple Species Conservation Plan

MTS	Metropolitan Transit System
N	
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NES	Natural Environment Study
NOAA	National Oceanic and Atmospheric Administration's
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O	
OSHA	Occupational Safety and Health Act
P	
PDT	Project Development Team
PEAR	Preliminary Environmental Analysis Report
PfC	Placentia sandy loam
PHF	Peak-hour factor
PHGA	Peak Horizontal Ground Acceleration
PHV	Percent of heavy vehicle
PM	afternoon – *Post meridiem*
PPE	personal protective equipment
PRC	Public Resources Code
PRC	Public Resources Code
PTSF	percent time spent following
R	
RaC	Ramona sandy loam
RaC2	Ramona loam
RCRA	Resource Conservation and Recovery Act of 1976
REAP	Rain Event Action Plan
RJER	Rancho Jamul Ecological Reserve
ROW	right-of-way
RSP	rock slope protection
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	
SAA	Streambed Alteration Agreement
SANDAG	San Diego Association of Governments
SCIC	South Coastal Information Center
SDC	Seismic Design Criteria
SDG&E	San Diego Gas &Electric
SDNHM	San Diego Natural History Museum
SDRFD	San Diego Rural Fire Protection District

SHPO	State Historic Preservation Officer
STAA	Surface Transportation Assistance Act
SWDR	Storm Water Data Report
SWMP	Statewide Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
T	
TCS	Transportation Concept Summary
TMDLs	Total Maximum Daily Loads
TMP	Transportation Management Plan
TSCA	Toxic Substances Control Act
TWW	Treated wood waste
U	
U.S.	United States
U.S. EPA	U.S. Environmental Protection Agency
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
USTs	underground storage tanks
V	
VIA	Visual Impact Assessment
W	
WDRs	Waste Discharge Requirements
WmC	Wyman loam
WPCP	Water Pollution Control Plan
X	
XPI	Extended Phase I Testing Report

Appendix E:

CEQA Checklist

CEQA Environmental Checklist

District 11-SD-SR94	13.4-14.2; 17.1-17.6; 19.2-20.2; 20.4-21.4	407700
Dist.-Co.-Rte.	P.M/P.M.	E.A.

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the project:				
a) Have a substantial adverse effect on a scenic vista	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐
The segment of Alternative 3 from Melody Road to the Reservation has the potential to create a significant amount of new light/glare. This would not be the case for Alternatives 1-2.				
II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

V. CULTURAL RESOURCES: Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

VI. GEOLOGY AND SOILS: Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

VII. GREENHOUSE GAS EMISSIONS: Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	An assessment of the greenhouse gas emissions and climate change is included in the body of environmental document. While Caltrans has included this good faith effort in order to provide the public and decision-makers as much information as possible about the project, it is Caltrans determination that in the absence of further regulatory or scientific information related to GHG emissions and CEQA significance, it is too speculative to make a significance determination regarding the project's direct and indirect impact with respect to climate change. Caltrans does remain firmly committed to implementing measures to help reduce the potential effects of the project. These measures are outlined in the body of the environmental document.

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

IX. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow	☐	☐	☐	☒

X. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?	☐	☐	☐	☒
b)Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☒	☐	☐

XI. MINERAL RESOURCES: Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

XII. NOISE: Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

XIII. POPULATION AND HOUSING: Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

XIV. PUBLIC SERVICES:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☒	☐
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XV. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
XVI. TRANSPORTATION/TRAFFIC: Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
XVII. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Appendix F:

List of Technical Reports

TECHNICAL REPORTS
SR-94 IMPROVEMENT PROJECT

Technical Report	Report Preparer	Date
Community Impact Assessment Jamul, California District 11 – San Diego County – State Route 94 – PM: 13.4-14.2; 17.1- 17.6; 19.2-20.2; 20.4-21.4	EDS, Inc.	June 2014
Noise Study Report SR-94 Improvement Project Jamul, California District 11 – San Diego County – State Route 94 – PM: 13.4-14.2; 17.1-17.6; 19.2-20.2; 20.4-21.4	Ldn Consulting	August 2014
Air Quality Study Report SR-94 Improvement Project Jamul, California District 11 – San Diego County – State Route 94 – PM: 13.4-14.2; 17.1-17.6; 19.2-20.2; 20.4-21.4	Ldn Consulting	May 2014
Visual Impact Assessment SR-94 (Jamul) Improvements Project California Department of Transportation Caltrans District 11, San Diego County State Route 94	Estrada Land Planning Inc.	May 2014
Natural Environment Study Jamul, California District 11 – San Diego County – Route 94 PM: 13.4-14.2; 17.1-17.6; 19.2-20.2; and 20.4-21.4	Natural Investigations Company	June 2014
Phase 1 Environmental Site Assessment State Route 94 Improvement Project - Access Alternatives - SR-94/Jamacha Boulevard	Natural Investigations Company	June 2014

- SR-94/Jamacha Road - SR-94/Lyons Valley Road - SR-94/Maxfield Road - SR-94/Steele Canyon Road		
Combined Paleontological Identification and Evaluation Report State Route 94 Improvement Project, San Diego County, California (11-SD-94; between P.M. 13.4-14.2; 17.1-17.6; 19.2-20.2; and 20.4-21.4)	Cogstone Resource Management Inc.	August 2014
Traffic Impact Study SR 94 Improvement Project	Kimley-Horn and Associates	July 2014
District Preliminary Geotechnical Report SR 94 Improvement Project Jamul, California	Geocon Incorporated	September 2013
Cultural Resources - Historical Resources Compliance Report (HRCR) - Archaeological Survey Report (ASR) - Extended Phase I Testing Report (XPI) State Route 94 Improvement Project San Diego County, California	Natural Investigations Company	August 2014
Cultural Resources Technical Memorandum: Intersection Improvements at Lyons Valley Road and State Route (SR) 94, Jamul Gaming Facility Project, Jamul, CA	Natural Investigations Company	October 2015
Biological Resources Technical Memo: Biological Assessment of the Change to the Project Description of the SR94 Improvement Project: SR94 / Lyons	Natural Investigations Company	November 2015

Valley Intersection Improvement Area, Jamul, CA.		

Appendix G:

Utility Conflicts

ASSESSMENT OF UTILITY IMPACTS					
	Size & Material	Agency Contact	Center Line Station Limits	Conflict	Recommendation
Access Alternatives (all)					
1	12 kV	SDG&E	37+50 to 87+00 (SD 94 Line)	Interferes with EB and WB Lane widening	Remove and replace with new steel poles
2	Unkown	AT&T	37+50 to 87+00 (SD 94 Line)	Interferes with EB and WB Lane widening	Remove poles and relocate cables to new SDG&E poles
3	Unkown	Cox	37+50 to 87+00 (SD 94 Line)	Interferes with EB and WB Lane widening	Remove poles and relocate cables to new SDG&E poles
4	12" ACP	Otay Water District	38+60 to 50+20 (SD 94 Line)	Interferes with EB and WB Lane widening	Remove and replace
5	12" ACP	Otay Water District	100+00 to 108+00 (MR Line)	Interferes with widening of Melody Road	Remove and replace
6	16" ACP	Otay Water District	50+20 to 67+50 (SD 94 Line)	Interferes with EB and WB Lane widening	Remove and replace
Steele Canyon					
1	12 kV	SDG&E	355+00 to 376+00 (SD 94 Line)	Interferes with EB and WB Lane widening	Remove and replace with new steel poles
2	10" ACP	Otay Water District	360+00	Potential conflict with storm drain	Perform utility test hole to confirm depth of existing water main
3	10" ACP	Otay Water District	362+00	Potential conflict with storm drain	Perform utility test hole to confirm depth of existing water main
4	Water Meters	Otay Water District	362+00	Interferes with EB widening	Relocate existing water meters
5	Water Meter	Otay Water District	363+95	Interferes with EB widening	Relocate existing water meter
6	Air Vac	Otay Water District	365+50	Interferes with EB widening	Relocate existing air vac
7	Blow Off	Otay Water District	365+75	Interferes with EB widening	Relocate existing blow off
8	16" ACP	Otay Water District	366+10	Potential conflict with storm drain	Perform utility test hole to confirm depth of existing water main
9	12" CCP	Otay Water District	366+10	Potential conflict with storm drain	Perform utility test hole to confirm depth of existing water main
10	16" ACP	Otay Water District	367+75	Potential conflict with storm drain	Perform utility test hole to confirm depth of existing water main
11	16" ACP	Otay Water District	371+25	Potential conflict with storm drain	Perform utility test hole to confirm depth of existing water main
Maxfield					
1	12 kV	SDG&E	605+50 to 621+50	Interferes with EB and WB Lane widening	Remove and replace with new steel poles

Appendix H:

SHPO Concurrence

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

September 26, 2014

Reply In Reference To: CATRA_2014_0828_001

Kevin Hovey
Chief, Environmental Analysis Branch D
Caltrans, District 11
4050 Taylor St., M.S. 242
San Diego, CA 92110

RE: HRCR submitted pursuant to PRC 5024 for proposed State Route 94 Improvement Project near Jamul, San Diego County, 11-SD-94, PM 13.4-14.2; 17.1-17.6; 19.2-20.2, and 20.4-21.4; EA 40770Y; PID: 110003413

Dear Mr. Hovey:

Thank you for requesting my comments pursuant to Public Resources Code Section 5024(b). In addition to your August 27, 2014 letter, the California Department of Transportation (Caltrans) has provided a Historical Resources Compliance Report (HRCR), with a Finding of No Adverse Effect. My staff has reviewed the documentation you provided, and I would like to offer the following comments.

Caltrans is required to conduct reviews of encroachments on State right-of-way. The Jamul Indian Village of California (JIV) is anticipating applying for one or more encroachment permits to perform the proposed project involving the JIV proposing to construct signalized driveway access to their separately and independently approved future gaming facility and to improve five intersection locations along State Route (SR) 94 as a result of traffic generated from the operation of their future gaming facility.

The Project Area Limits (PAL) is delineated on Figure 3 of the HRCR.

Caltrans determined that one state-owned cultural resource, archaeological site CA-SDI-14954 is located in the PAL and that the site does not meet the National Register or California Landmark eligibility criteria.

I concur with your determination of ineligibility and with your finding of no effect on state-owned resources.

If you have any questions or concerns, please contact Michelle C. Messinger, Historian II of my staff at (916) 445-7005 or at Michelle.Messinger@parks.ca.gov.

Sincerely,

Carol Roland-Nawi, Ph.D.

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer

CC: Gloria Scott, Chief, Built Environment Preservation Services Branch

Appendix I:

USFWS Species List

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Carlsbad Fish and Wildlife Office
2177 SALK AVENUE - SUITE 250
CARLSBAD, CA 92008
PHONE: (760)431-9440 FAX: (760)431-5901
URL: www.fws.gov/carlsbad/

Consultation Code: 08ECAR00-2015-SLI-0156 January 23, 2015
Event Code: 08ECAR00-2015-E-00349
Project Name: SR-94 Improvement Project

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment

United States Department of Interior
Fish and Wildlife Service

Project name: SR-94 Improvement Project

Official Species List

Provided by:

Carlsbad Fish and Wildlife Office
2177 SALK AVENUE - SUITE 250
CARLSBAD, CA 92008
(760) 431-9440
http://www.fws.gov/carlsbad/

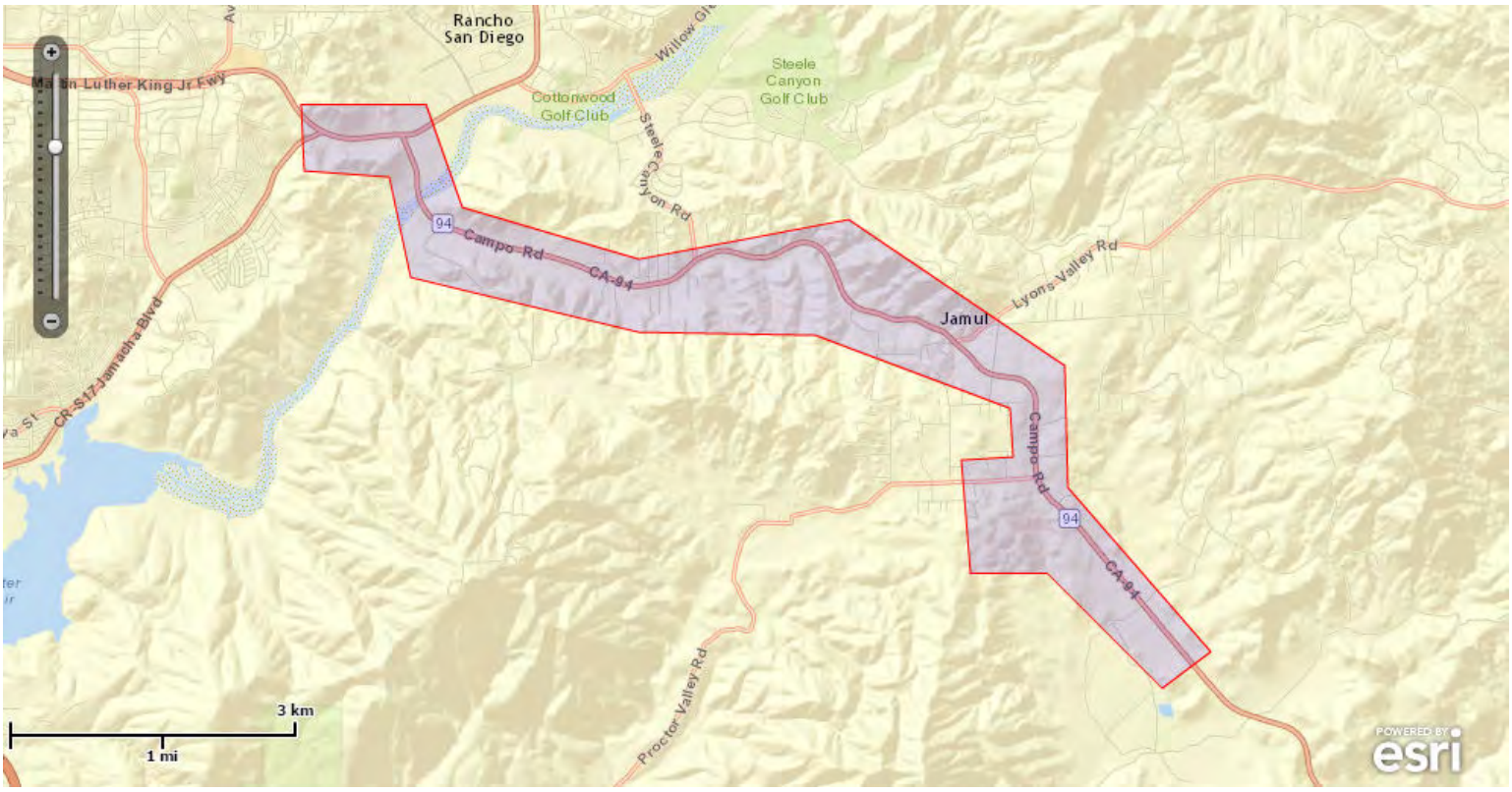
Consultation Code: 08ECAR00-2015-SLI-0156
Event Code: 08ECAR00-2015-E-00349

Project Type: Development

Project Name: SR-94 Improvement Project
Project Description: Intersection improvements at SR94 and Jamacha Blvd., Jamacha Rd., Steele Cyn Rd., Lyons Valley Rd., Maxfield Rd., and Melody Rd, and road widening for access to Jamul Indian Village

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-116.9537549 32.7425063, -116.9396787 32.7425063, -116.9355588 32.7326875, -116.9156461 32.7277777, -116.8919568 32.7315322, -116.8675809 32.7176684, -116.8672376 32.7061135, -116.8511014 32.6905121, -116.8565946 32.6870448, -116.8696409 32.6980242, -116.8782239 32.6980242, -116.8792539 32.7087135, -116.8734174 32.7090024, -116.8737607 32.7136244, -116.8957334 32.7205569, -116.9156461 32.7208457, -116.9413953 32.7260447, -116.9437986 32.7355755, -116.9534116 32.736153, -116.9537549 32.7425063)))

Project Counties: San Diego, CA

Endangered Species Act Species List

There are a total of 13 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Amphibians	**Status**	**Has Critical Habitat**	**Condition(s)**
arroyo toad *(Anaxyrus californicus)* Population: Entire	Endangered	Final designated	
Birds			
Coastal California gnatcatcher *(Polioptila californica californica)* Population: Entire	Threatened	Final designated	
Least Bell's vireo *(Vireo bellii pusillus)* Population: Entire	Endangered	Final designated	
Southwestern Willow flycatcher *(Empidonax traillii extimus)* Population: Entire	Endangered	Final designated	
Crustaceans			
San Diego fairy shrimp *(Branchinecta sandiegonensis)*	Endangered	Final designated	
Flowering Plants			
California Orcutt grass *(Orcuttia californica)*	Endangered		

Mexican flannelbush *(Fremontodendron mexicanum)*	Endangered	Final designated	
Otay tarplant *(Deinandra (=hemizonia) conjugens)*	Threatened	Final designated	
San Diego ambrosia *(Ambrosia pumila)*	Endangered	Final designated	
San Diego button-celery *(Eryngium aristulatum var. parishii)*	Endangered		
San Diego thornmint *(Acanthomintha ilicifolia)*	Threatened	Final designated	
Spreading navarretia *(Navarretia fossalis)*	Threatened	Final designated	
Insects			
Quino Checkerspot butterfly *(Euphydryas editha quino (=e. e. wrighti))* Population: Entire	Endangered	Final designated	

Critical habitats that lie within your project area

The following critical habitats lie fully or partially within your project area.

Birds	**Critical Habitat Type**
Coastal California gnatcatcher *(Polioptila californica californica)* Population: Entire	Final designated
Least Bell's vireo *(Vireo bellii pusillus)* Population: Entire	Final designated
Southwestern Willow flycatcher *(Empidonax traillii extimus)* Population: Entire	Final designated
Flowering Plants	
Otay tarplant *(Deinandra (=hemizonia) conjugens)*	Final designated
San Diego ambrosia *(Ambrosia pumila)*	Final designated
Insects	
Quino Checkerspot butterfly *(Euphydryas editha quino (=e. e. wrighti))* Population: Entire	Final designated

Appendix J:

References

APPENDIX J: REFERENCES

Andrews, A., 1990. Fragmentation of habitat by roads and utility corridors: a review. Australian Zoologist 23, 130–141.

Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, and T. J. Rosatti, editors., 2012. The Jepson Manual: Vascular Plants of California, second edition, thoroughly revised and expanded. University of California Press, Berkeley, California. 1,600 pp.

Barrientos, R., and L. Bolonio, 2009. The presence of rabbits adjacent to roads increases polecat road mortality. Biodiversity Conservation 18:405-418.

Bennett, A.F., 1991. Roads, roadsides and wildlife conservation: a review. In: Saunders, D.A., Hobbs, R.J. (Eds.), Nature Conservation 2: The Role of Corridors. Chipping Norton, Australia, Surrey Beatty, pp. 99–117.

Brehme, C.S., 2003. Responses of small terrestrial vertebrates to roads in a coastal sage scrub ecosystem. Master's thesis, San Diego State University, California. 54 pp.

Brehme, C.S., J.A. Tracey, L.R. McClenaghan, and R.N. Fisher, 2013. Permeability of roads to movement of scrubland lizards and small mammals. Conservation Biology 27(4):710-720.

Brenzel, K.N., 2001. Sunset Western Garden Book. Sunset Publishing Corporation, Menlo Park, California. 768 pp.

Bureau of Indian Affairs and the National Indian Gaming Commission, 2001. Jamul Indian Village 101-acre Fee-to-Trust Transfer Project and Casino Project Final Environmental Assessment. SCH # 2001024001.

Bureau of Indian Affairs, 2003. Jamul Indian Village, San Diego County, Final Environmental Impact Statement, Volume I, II, III. Prepared by Analytical Environmental Services Inc.

Calflora, 2013. Calflora, the on-line gateway to information about native and introduced wild plants in California. Internet database available at http://calflora.org/.

CDFG, 2007. California Wildlife: Conservation Challenges—California's Wildlife Action Plan. Prepared by the UC Davis Wildlife Health Center. California Department of Fish and Game, Sacramento, California. 597 pp.

ibid, 2013b. California's Plants and Animals. Habitat Conservation Planning Branch, California Department of Fish and Wildlife, Sacramento, California. http://www.dfg.ca.gov/hcpb/species/search_species.shtml.

ibid, 2013c. California's Wildlife. California Wildlife Habitat Relationships System, Biogeographic Data Branch, California Department of Fish and Wildlife. Internet database available at http://www.dfg.ca.gov/whdab/html/cawildlife.html.

CNPS, 2011. Inventory of Rare and Endangered Plants, 7th edition. Rare Plant Scientific Advisory Committee, David P. Tibor, convening editor. California Native Plant Society. Sacramento, California. Internet database available at http://cnps.web.aplus.net/cgi-bin/inv/inventory.cgi.

Caltrans, 2008. Paleontology, Online Environmental Handbook, vol. 1, chapter 8. http://www.dot.ca.gov/ser/vol1/sec3/physical/Ch08Paleo/chap08paleo.htm

CARB, 2013a. California Ambient Air Quality Standards (CAAQS), June 7, 2012. Available at http://www.arb.ca.gov/aqs/aaqs2.pdf. Accessed May 28, 2013.

ibid, 2001. California Air Resources Board, Information on diesel particulate classification and programs. Available at www.arb.ca.gov.

Carr, L.W., Fahrig, L., and S.E. Pope, 2002. Impacts of landscape transformation by roads. In: Gutzwiller, K.J. (Ed.), Applying Landscape Ecology in Biological Conservation. Springer-Verlag, New York, pp. 225–243.

CDC, 2000. California Department of Conservation. A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos, California Department of Conservation, Geological Surveys. Available at ftp://ftp.consrv.ca.gov/ pub/dmg/pubs/ofr/ofr_2000-019.pdf.

CDFW, 2014: Rancho Jamul Ecological reserve – Conservation Efforts. Website http://www.dfg.ca.gov/lands/er/region5/ranchojamul/conservation.html. Website accessed July 2014.

ibid, 2013a. RareFind 4.x, California Natural Diversity Data Base. Sacramento, California (updated monthly by subscription service).

Chavez, M., 2011. Phone conversation with Michael Chavez, Customer Response, American Medical Response. October 10, 2011.

Clarke, G.P., P.C.L. White, and S. Harris, 1998. Effects of roads on badger Meles meles populations in southwest England. Biological Conservation 86:117-124.

Coffin, A.W., 2007. From roadkill to road ecology: A review of the ecological effects of roads. Journal of Transport Geography 15:396–406.

Cowardin, L.M., V. Carter, and E.T. LaRoe, 1979. Classification of wetlands and deepwater habitats of the United States. Office of Biological Services, U. S. Fish and Wildlife Service, Washington, District of Columbia.

Council of Science Editors, 2006. Scientific style and format: the CSE manual for authors, editors, and publishers, 7th edition. Rockefeller University Press, Reston, Virginia. 658 pp.

County of San Diego, 1997. Multiple Species Conservation Program, County of San Diego Subarea Plan. Prepared by the County of San Diego in conjunction with the U.S. Fish and Wildlife Service, California Department of Fish and Game. Available on the Internet: http://www.sdcounty.ca.gov/dplu/mscp/.

Ibid, 2008. County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements - Biological Resources.

Ibid, 2013. SanBIOS database. San Diego Department of Planning and Land Use.

Davis, M.A., and K. Thompson, 2000. Eight Ways to Be a Colonizer; Two Ways to Be an Invader: A Proposed Nomenclature Scheme for Invasion Ecology. Bulletin of the Ecological Society of America 81:226–230.

Eigenbrod, F., S. J. Hecnar, and L. Fahrig, 2008. Accessible habitat: an improved measure of the effects of habitat loss and roads on wildlife populations. Landscape Ecology 23:159–168.

Environmental Laboratory, 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1. U.S. Army Engineer Waterways Experiment Station. Vicksburg, Mississippi. 92 pp.

Environmental Resources Management, 1996. The significance of secondary effects from roads and road transport on nature conservation. English Nature Research Report No. 178, p. 91. English Nature, Peterborough, U.K.

Fahrig, L., and T. Rytwinski, 2009. Effects of roads on animal abundance: an empirical review and synthesis. Synthesis, part of a Special Feature on Effects of Roads and Traffic on Wildlife Populations and Landscape Function. Ecology and Society 14(21):1-20.

Farquharson, 2004. Geology of the Rancho San Marcos Dike Swarm, Baja California, Mexico. Accessed on line September 14, 2013 at http://thesis.geology-guy.com/ptf_thesis.htm.

FHWA, 2006. Federal Highway Administration. Road Construction Noise Model, Version 1, February 2, 2006.

Final Tribal EE, 2013. Final Tribal Environmental Evaluation: Jamul Indian Village Gaming Development Project Volume I and II. January 2013.

Forman, R.T., 2006. Good and bad places for roads: effects of varying road and natural pattern on habitat loss, degradation, and fragmentation. IN: Proceedings of the 2005 International Conference on Ecology and Transportation, Eds. Irwin CL, Garrett P, McDermott KP. Center for Transportation and the Environment, North Carolina State University, Raleigh, NC: pp. 164-174.

Forman, R.T.T., and L.E. Alexander, 1998. Roads and their major ecological effects. Annu. Rev. Ecol. Syst. 29:207–31

Forman, R.T.T., D. Sperling, J. A. Bissonette, A. P. Clevenger, C. D. Cutshall, V. H. Dale, L. Fahrig, R. France, C. R. Goldman, K. Heanue, J. A. Jones, F. J. Swanson, T. Turrentine, and T. C. Winter, 2003. Road ecology: science and solutions. Island Press, Washington, D.C., USA. 481 pp.

Havlick, D.G. 2002. No Place Distant: Roads and Motorized Recreation on America's Public Lands. Island Press, Washington.

Hay, 1927. Pleistocene of the Western Region of North America and its vertebrated animals. *Carnegie Institution of Washington Publication* 322B.

Hels, T., and E. Buchwald, 2001. The effect of road kills on amphibian populations. Biological Conservation 99:331–340.

Holland, R.F., 1986. Preliminary descriptions of the terrestrial natural communities of California. State of California, The Resources Agency, Nongame Heritage Program, Department of Fish and Game, Sacramento, California. 156 pp.

Inbar, M., Mayer, R.T., 1999. Spatio-temporal trends in armadillo diurnal activity and road-kills in central Florida. Wildlife Society Bulletin 27:865-872.

Jameson Jr., E.W., and H.J. Peeters, 2004. Mammals of California, revised edition. California Natural History Guides No. 66. University of California Press, Berkeley, California. 429 pp.

Jefferson, 1991a. A Catalogue of late Quaternary Vertebrates from California: Part one, nonmarine lower vertebrate and avian taxa. *Natural History Museum of Los Angeles, Technical Report* #5.
Ibid, 1991b. A Catalogue of late Quaternary Vertebrates from California: Part two, Mammals. *Natural History Museum of Los Angeles, Technical Report* #7.

Kimley Horn and Associates, 2014. State of California Department of Transportation Permit Engineering Evaluation Report. Kimley Horn and Associates. April 28, 2014.

Kimley-Horn and Associates, 2013. Draft Traffic Impact Study State Route 94 Improvement Project, March 2013.

Ibid, 2012. Jamul Indian Village Gaming Project Traffic Impact Study. Prepared for Jamul Indian Village. Prepared by Kimley-Horn and Associates, Inc. San Diego, CA. 801 pp.

Kociolek, A.V., and A.P. Clevenger, 2009. Effects of Paved Roads on Birds: A Literature Review and Recommendations for the Yellowstone to Yukon Ecoregion. A report prepared for the Yellowstone to Yukon Conservation Initiative Society, Canmore, Alberta, Canada. Published by the Western Transportation Institute, College of Engineering, Montana State University. 29 pp.

Lanner, R.M., 2002. Conifers of California. Cachuma Press, Los Olivos, California. 274 pp.

LMP, 2008: Hollenbeck Canyon Wildlife Area Land Management Plan. EDAW, Inc. August 2008. Website https://www.dfg.ca.gov/lands/mgmtplans/hcwa/. Website accessed July 2014.
Mayer, K.E., and W.F. Laudenslayer, Jr., editors. 1988. A Guide to Wildlife Habitats of California. State of California, Resources Agency, Department of Fish and Game, Sacramento, California. 166 pp.

McGregor, R.L., D.J. Bender, and L. Fahrig, 2008. Do small mammals avoid roads because of the traffic? Journal of Applied Ecology 45:117–123.

Nafis, G., editor, 2011. California Reptiles and Amphibians. Published by CaliforniaHerps.com. Internet website, http://www.californiaherps.com/index.html.

National Park Service, 1997. *How to Apply the National Register Criteria for Evaluation*. National Register Bulletin 15. U.S. Department of the Interior, National Park Service.
NatureServe. 2011. NatureServe Explorer: An online encyclopedia of life, Version 7.1. NatureServe, Arlington, Virginia. Internet database available at http://www.natureserve.org/explorer.

Oberbauer, T., 1996. Terrestrial Vegetation Communities in San Diego County Based on Holland's Descriptions. County of San Diego Department of Planning and Land Use.

Oberbauer, T., M. Kelly, and J. Buegge, 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California," R. F. Holland, Ph.D., October 1986.

Orłowski, G., 2005. Factors affecting road mortality of the Barn Swallows Hirundo rustica in farmland. Acta Ornithol. 40:117–125.

Pavlik, B.M., P.C. Muick, S.G. Johnson, and M. Popper, 1991. Oaks of California. Cachuma Press and the California Oak Foundation. Los Olivos, California. 184 pp.

Powell, J.A., and C.L. Hogue, 1979. California Insects. University of California Press, Berkeley, California. 388 pp.

Roedenbeck, I. A., L. Fahrig, C. S. Findlay, J. E. Houlahan, J. A. G. Jaeger, N. Klar, S. Kramer- Schadt, and E. A. van der Grift, 2007. The Rauischholzhausen agenda for road ecology. Ecology and Society 12(11):1-21.

Rosa, S., and J. Bissonette, 2007. Roads and Desert Small Mammal Communities: Positive Interaction? Pages 562–566 in: C. L. Irwin, D. Nelson, and K. P. McDermott, editors. Proceedings of the 2007 International Conference on Ecology and Transportation. Center for Transportation and Environment, North Carolina State University, Raleigh, North Carolina, USA.

SANDAG, 2012. Land Use and regional Growth website. www.SANDAG.org. October 2012.

ibid, 2011. Our Region, Our Future. 2050 Regional Transportation Plan. SANDAG. October 2011.

San Diego County, 2014: County of San Diego Parks and Recreation. Website http://www.co.san-diego.ca.us/parks/aboutus.html. Website accessed July 2014.

ibid, 2011. County of San Diego Draft General Plan; A Plan for Growth, Conservation and Sustainability. Available online at http://www.sdcounty.ca.gov/pds/generalplan.html. August 2011.

ibid, 2011a. Jamul/Dulzura Subregional Plan. San Diego County General Plan. Adopted December 31, 1979. Amended August 3, 2011.

Ibid, 2009. Guidelines for Determining Significance Paleontological Resources. Accessed online September 14, 2013 at http://www.sdcounty.ca.gov/pds/docs/Paleo-Guidelines.pdf.

Ibid, 1997. Multiple Species Conservation Program. San Diego County. October 1997.

Sawyer, J.O., and T. Keeler-Wolf, 1995. A manual of California vegetation. California Native Plant Society, Sacramento, California. Available electronically at http://davisherb.ucdavis.edu/cnps ActiveServer/index.html.

Seiler, A., 2005. Predicting locations of moose–vehicle collisions in Sweden. Journal of Applied Ecology 42:371–382.

Sibley, D.A., 2003. The Sibley Field Guide to Birds of Western North America. Alfred A. Knopf, Inc., New York, New York.

Sikes and Arrington, 2014a. *Historic Property Survey Report for the State Route 94 Improvement Project, San Diego County, California, 11-SD-94; PM: 13.4-14.2, 17.1-17.6, 19.2-20.2, 20.4-21.4; EFIS No. PI: 110003413*. August 2014. Report prepared by Natural Investigations Company, LLC for Caltrans District 11, San Diego, California.

ibid, 2014b. *Extended Phase I Testing of Report on P-37-007966/011410 (CA-SDI-7966/11410/H), P-37-011050 (CA-SCI-11050), P-37-014673, P-37-014674, P-37-016541 (CA-SDI-14954), P-37-028621 (CA-SDI-18402), and P-37-030047 (CA-SDI-19159) for the State Route 94 Improvement Project, San Diego County, California, 11-SD-94, PM 20.4/21.4, EFIS No. PI: 110003413.* August 2014. Report prepared by Natural Investigations Company, LLC for Environmental Data Systems, Sacramento, California, and Caltrans District 11, San Diego, California.

Ibid, 2014c. *Cultural Resources Phase I Testing of P-31-016541 (CA-SDI-14954) for the State Route 94 Improvement Project, San Diego County, California*. August 2014. Report prepared by Natural Investigations Company, LLC for Environmental Data Systems, Sacramento, California, and the U.S. Bureau of Indian Affairs, Pacific Regional Office, Sacramento, California.

Ibid, 2014d. *ESA Action Plan for the State Route 94 Improvement Project, San Diego County, California*. August 2014. Plan prepared by Natural Investigations Company, LLC for Caltrans District 11, San Diego, California.

Simberloff, D., D.C. Schmitz, and T.C. Brown, 1997. Strangers in Paradise: Impact and Management of Non- Indigenous Species in Florida. Island Press. Washington, D.C.

Spellerberg, I.F., 1998. Ecological Effects of Roads and Traffic: A Literature Review. Global Ecology and Biogeography Letters 7(5):317-333.

Stebbins, R.C., 2003. A Field Guide to Western Reptiles and Amphibians, 3rd edition. Houghton-Mifflin Co., Boston, Massachusetts.

Stuart, J.D., and J.O. Sawyer, 2001. Trees and Shrubs of California. California Natural History Guides. University of California Press, Berkeley, California. 467 pp.

Tan, 2002. Geologic map of the Jamul Mountains 7.5' quadrangle San Diego County, California: a digital database. California Geological Survey, Preliminary Geologic Map, scale 1:24,000.

The Natural Resources Agency, 2009. California Environmental Quality Act (CEQA) Statute and Guidelines. Codified in CEQA (Public Resources Code 21000-21177) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387). Available electronically at http://leginfo.ca.gov and http://ceres.ca.gov/ceqa/index.html.

Thorp, J.H., and A.P. Covich, 2001. Ecology and classification of North American freshwater invertebrates, 2nd edition. Academic Press, San Diego, California. 1,056 pp.

Todd, 2004. Preliminary geologic map of the El Cajon 30' x 60' quadrangle, southern California. United States Geological Survey Open File Report 2004-1361, scale 1:100, 000.

Trombulak, S.C., and C.A. Frissell, 2000. Review of ecological effects of roads on terrestrial and aquatic communities. Conservation Biology 14:18–30.

UC Davis Road Ecology Center, 2012. California Roadkill Observation System website. Information Center for the Environment, UC Davis, Davis, California. Available at http://wildlifecrossing.net/california).

Underhill, J.E., and P.G. Angold, 2000. Effects of roads on wildlife in an intensively modified landscape. Environmental Reviews 8:21–39.

USACE, 2001. Final Summary Report: Guidelines for jurisdictional determinations for waters of the United States in the arid Southwest. South Pacific Division. 12 pp. Available electronically at http://www.spl.usace.army.mil/regulatory/.

USACE and USEPA, 2007. 2007 Nationwide Permits, Conditions, Further Information, and Definitions (with corrections). Headquarters, US Army Corps of Engineers, Washington, D.C. 38 pp.

ibid, 2008. Revised Guidance on Clean Water Act Jurisdiction Following the Supreme Court Decision in Rapanos v. U.S. and Carabell v. U.S. Memorandum available online at http://www.usace.army.mil/cw/cecwo/reg/cwa_guide/cwa_juris_2dec08.pdf.

USFWS, 2013. FWS Endangered and Threatened Species Critical Habitat Portal. Environmental Conservation Online System. Internet database available at http://criticalhabitat.fws.gov/

Ibid, 2012. National Wetlands Inventory Program, Division of Habitat and Resource Conservation. Internet site at http://www.fws.gov/wetlands/.

University of California at Berkeley, 2013a. Jepson Online Interchange for California Floristics. Jepson Flora Project, University Herbarium and Jepson Herbarium, University of California at Berkeley. Internet database available at http://ucjeps.berkeley.edu/interchange.html.

ibid, 2013b. CalPhotos. Biodiversity Sciences Technology Group, University of California at Berkeley. Internet database available at http://calphotos.berkeley.edu/.

USEPA, 2013a. Six Common Pollutants, Particulate Matter. Available at http://www.epa.gov/air/particlepollution/index.html.

ibid, 1996. EPA Takes Final Step in Phaseout of Leaded Gasoline. January 29.

USFWS, 2014: San Diego National Wildlife Refuge.
Website http://www.fws.gov/refuges/profiles/index.cfm?id=81720. Website accessed July 2014.

U.S. Census, 2012. U.S. Census Bureau: State and County Quick Facts. www.quickfacts.census.gov. October 2012.

USDA, 2014. United States Department of Agriculture, Natural Resource Conservation Service. Website http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. May 12, 2014.

ibid, 1973. Soil Survey; San Diego Area, California. Part I. United States Department of Agriculture, Soil Conservation Service and Forest Service in cooperation with the University of California Agricultural Experiment Station, United States Department of Interior, Bureau of Indian Affairs, Department of the Navy and United States Marine Corps. Issued December 1973.

Van Langevelde, F., and C.F. Jaarsma, 2004. Using traffic flow theory to model traffic mortality in mammals. Land Ecol. 19:895–907.

Western Region Climatic Center, 2013. Monthly Climate Summary, Escondido, California. Available at http://www. wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2862. Accessed May 28.