

3.1 INTRODUCTION

No new significant environmental impacts, beyond those already covered in the DEIR, were raised during the comment period and the City of Elk Grove acting as lead agency directed that a FEIR be prepared. Responses to comments received during the comment period do not involve any new significant impacts or “significant new information” that would require recirculation of the DEIR pursuant to CEQA Guidelines Section 15088.5.

3.2 LIST OF COMMENTERS

**TABLE 3.0-1
COMMENTERS TO THE EIR**

Letter	Individual or Signatory	Affiliation	Date
A	Margit Aramburu	Delta Protection Commission	8/18/03
B	Rita Velasquez	Elk Grove Community Services District	9/18/03
C	Larry Eng	Department of Fish and Game	9/19/03
D	Taiwo Jaiyeoba	Sacramento Regional Transit District	9/22/03
E	Jody Hashigami	County of Sacramento, Department of Water Resources	9/25/03
F	Peter Christensen	Sacramento Metropolitan Air Quality Management District	9/25/03
G	Marnie Rosenstein	Elk Grove Unified School District	9/25/03
H	Erik Vink	State of California Department of Conservation	9/25/03
I	Ken Trott	California Department of Food and Agriculture	9/25/03
J	F. I. “Butch” Hodgkins	Sacramento Area Flood Control Agency	9/23/03
K	Jeff Pulverman	Caltrans	9/25/03
L	Jeff Atteberry, P.E.	County Sanitation District 1	9/24/03
M	Samar Hajeet, Grave Hovey	City of Sacramento	9/23/03
N	Matthew Darrow, P.E.	County of Sacramento Public Works Agency, Department of Transportation	9/22/03
O	Mary Snyder	Sacramento Regional County Sanitation District	9/29/03
P	William Forrest	County of Sacramento Department of Water Resources	9/26/03
Q	Terry Roberts	State Clearinghouse	9/26/03
1	David Mathes	Resident	8/15/03
2	Eulalia Geban	Sheldon Community Association, Traffic Committee Chair	9/02/03
3	Catherine Spinelli	Resident	9/05/03
4	Cari Seymour	Sheldon Community Association, Co-chair	9/11/03

3.0 COMMENTS AND RESPONSES

Letter	Individual or Signatory	Affiliation	Date
5	Shirley Peters	Greater Sheldon Road Estates Homeowners Association, President	9/12/03
6	Leo Fassler	Resident	9/17/03
7	Paul Andrew Hensleigh	Resident	9/18/03
8	Susie Sweeney; Lynn and Gordon Wheat	Residents	9/22/03
9	August A. Saibeni	Greater Sheldon Road Estates Homeowners Association, member	9/22/03
10	Sharon Lynes	Resident	9/23/03
11	Baldur and Jennifer Tryggvason	Residents	9/17/03
12	Shirley Peters	Greater Sheldon Road Estates Homeowners Association, President	9/22/03
13	Eulalia Geban	Sheldon Community Association, Traffic Committee Chair	9/18/03
14	Todd L. Eising	Resident	No date
15	James A. Estep	Swainson's Hawk Technical Advisory Committee, Chair	No date
16	George E. Phillips	Law Offices of George E. Phillips	9/25/03
17	Douglas E. Jaffe	Environmental Council of Sacramento	9/25/03
18	Catherine Spinelli	Resident	9/24/03
19	John Puente (not on letter)	Elk Grove Citizen's Community Council	9/24/03
20	Chris Davis	Resident	9/25/03
21	Greg Suba, et. Al	Laguna Creek Watershed Council	9/20/03
22	Lisa Dixon	Resident	9/25/03
23	Vicki Lee	Sierra Club, Chapter Conservation Chair	9/25/03
24	John R. Fletcher	Fletcher, White, & Adair	9/25/03
25	Chris Conard	Resident	9/25/03
26	Bruce Walters	MacKay & Soms	9/25/03
27	John and Glennah Trochet	Residents	9/25/03
28	Christopher and Lonnie Fellersen	Residents	9/22/03
29	Michael Moriarty	Resident	9/25/03
30	Mindy Cecchettini, Genelle Treaster	South County Citizens for Responsible Growth	9/25/03
31	Pam Spittler	Resident	9/25/03
32	James P. Pacht	Attorney, Friends of the Swainson's Hawk	9/25/03
33	Mike Eaton	The Nature Conservancy	9/24/03
34	Jane S. Clark	Resident	9/25/03
35	Pat Koenig	Resident	9/25/03

Letter	Individual or Signatory	Affiliation	Date
36	Mayme Schwartz	Resident	9/25/03
37	June Coats	Resident	9/25/03
38	Sandy & Michael Stodden	Residents	9/26/03
39	Liz Zainasheff	Stone Lakes National Wildlife Refuge Association	9/24/03
40	Public Meeting on DEIR	Residents	9/11/03
41	Public Hearing on Draft General Plan	Residents	9/18/03

3.3 COMMENTS AND RESPONSES

3.3.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment in ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guideline Section 15088 also recommends that where response to comments results in revisions to the Draft EIR, that those revisions be noted as a revision to the Draft EIR or in a separate section of the Final EIR.

3.3.2 MASTER RESPONSES

Several comment letters included common comments on issues associated with the project and the Draft EIR. In order to streamline the Final EIR, master responses have been prepared for these common comments and addressed the following issue areas. However, it should be noted that all comments are responded to in this Final EIR.

- Planned Width of Grant Line Road
- Detailed Analysis of Level of Service
- Biological Resources Analysis
- Agricultural Resources Analysis

3.0 COMMENTS AND RESPONSES

3.3.3 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- *Public agency comment letters are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1: A-1).*
- *Individual and interest group comment letters are coded by numbers and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1: 1-1).*

Where changes to the DEIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text). Comments that are presented opinions about the project or raise issue not directly related to environmental issues are noted without response. General Plan Goals, Policies, and Action Items referenced throughout this document are from the August 2003 Public Hearing Draft General Plan, unless otherwise noted. As a result of comment letters received, revisions have been made to the Goals, Policies, and Action Items. Revised Goals, Policies, and Action Items from the October 2003 City Council Hearing Draft General Plan are provided in Table 2.0-1.

3.4 MASTER RESPONSES

3.4.1 TRAFFIC ISSUES ASSOCIATED WITH GRANT LINE ROAD

The proposed General Plan includes widening of Grant Line Road from 2 lanes under existing conditions to 6 and 8 lanes under buildout conditions in within the City. Several comment letters were received by the City regarding various concerns associated with the widening of this roadway and it impacts on the environment, community of Sheldon and on the quality of life in the area. Also several comment letters expressed the opinion that the widening of the roadway was not necessary to adequately convey traffic. Specific concerns regarding the planned widening of Grant Line Road and the analysis provided in the Draft EIR are summarized below. Response to each of these concerns is also provided below.

The Need to Widen Grant Line Road

Grant Line Road is an important component of the City's roadway network, which serves both local and regional travel. Grant Line Road connects with several arterial roadways that provide access for the residents of the City, and connects with regional roadways. Grant Line Road has been planned to be widened to six lanes in the Elk Grove area since 1993 and is noted in the Sacramento County General Plan Transportation Plan. The Metropolitan Transportation Plan (MTP) identifies the planned widening of Grant Line Road to 4 lanes to Sunrise Boulevard by 2008, reconstruction of the Grant Line Road/State Route 99 (SR 99) interchange and construction of the Elk Grove/Interstate 5 (I-5) Connector that would link I-5, Kammerer Road, SR 99, Grant Line Road, Sunrise Boulevard and Highway 50 into a regional roadway facility. The Draft EIR traffic analysis (Draft EIR pages 4.5-52 through -80) identifies that the planned widening of Grant Line Road to a 6 to 8 lane facility is necessary to maintain traffic levels of service (LOS) along a majority of the roadway within the City's LOS standard of LOS "D" (though it is noted that even with these improvements portions of Grant Line Road would not meet LOS "D" near SR 99). The environmental impact analysis provided in the Draft EIR considers the environmental effects of

the proposed widening of City roadways (including Grant Line Road) and anticipated impacts of these roadway widenings are noted in Draft EIR Table 4.5-9.

Consideration of Alternatives to the Widening of Grant Line Road

Several comment letters suggest that the City should have looked at alternatives to the widening of Grant Line Road as required under CEQA. Several alternatives were suggested. CEQA Guidelines 15126.6(a) requires that an EIR consider a reasonable range of alternatives to project. Alternatives considered in an EIR should feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR is not required to consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The following is a summary of alternatives suggested and an analysis of those alternatives.

Roadway Realignment Alternatives – This alternative was generally mentioned by several commenters. This included consideration of shifting the alignment of Grant Line Road to bypass the community of Sheldon (noted as the proposed alternate route by the Sheldon Community Association) as well as other alternatives involving shifting the entire roadway facility (e.g., south of the Cosumnes River). Shifting a portion of the Grant Line Road alignment south to avoid the community of Sheldon would place it within the 100-year floodplain of Deer Creek and the Cosumnes River and potential in close proximity to sensitive habitats along both waterways. While this shift would avoid direct impacts to the Town of Sheldon, it would result in increased water resource and biological resource impacts that are currently avoided by the proposed General Plan alignment. In addition, this alignment would appear to be outside of the City limits and thus is outside of the City's jurisdiction making it infeasible for the City to implement. Entire realignment of Grant Line Road would be inconsistent with the MTP and Sacramento County General Plan planned circulation improvements that would provide a regional roadway facility connecting I5, SR 99 and Highway 50 and would infeasible for the City to implement if located outside of City limits. However, it is acknowledged that the final design of this regional roadway facility has not been determined and the City supports the consideration of other alternatives to this regional roadway facility that minimizes its impact on the community of Sheldon and the surrounding area. Policies and a notation on the General Plan Proposed Roadway Network Map in the General Plan Circulation Element now reflect this position of the City.

Reduction in the Roadway Width Alternative – This alternative consists of suggested modifications to the width of Grant Line Road from the proposed 6 to 8 lane design to 2 to 4 lane design. As shown below in **Table 3.0-2**, the segment of Grant Line Road between Bond Road and Sheldon Road at 6-lanes wide would operate at acceptable LOS with buildout of the Proposed General Plan. During the A.M. peak hour, this segment would operate at LOS A in the northeast bound direction, and LOS C in the southwest bound direction. During the P.M. peak hour, this segment would operate at LOS D in the northeast bound direction, and LOS C in the southwest bound direction. It should be noted the data presented in **Table 3.0-2** is different than the data presented in Table 4.5-7 and Table 4.5-8 of the General Plan Draft EIR. The data in **Table 3.0-2** focuses on the segment of Grant Line Road between Bond Road and Sheldon Road. Conversely, the segment of Grant Line Road between Bond Road and Sheldon Road is included in the longer portion between Bradshaw Road and Sheldon Road described in Table 4.5-7 and Table 4.5-8 of the General Plan Draft EIR.

In response to public comments, and at the direction of the Planning Commission, the City has conducted an analysis of traffic operations with Grant Line Road at 4-lanes wide under future year buildout conditions. This analysis involved use of the City General Plan traffic

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model and LOS analysis of the resulting traffic volumes. **Table 3.0-2** presents a summary of this analysis. The data presented in **Table 3.0-2** focuses on the portion of Grant Line Road in the Sheldon area.

TABLE 3.0-2
TRAFFIC VOLUMES, LOS, AND VOLUME/CAPACITY RATIOS ON GRANT LINE ROAD BETWEEN BOND ROAD
AND SHELDON ROAD WITH BUILDOUT OF THE PROPOSED GENERAL PLAN

Time Period	Direction of Travel	w/ 6 Lanes (3 in each direction)			w/ 4 Lanes (2 in each direction)			
		Traffic Volume	Volume / Capacity Ratio	Level of Service	Traffic Volume	Change in Traffic Volume	Volume / Capacity Ratio	Level of Service
A.M. Peak Hour	Northeastbound	1,734	0.58	A	1,684	-3%	.85	D
A.M. Peak Hour	Southwestbound	2,102	0.71	C	1,969	-6%	.99	E
P.M. Peak Hour	Northeastbound	2,403	0.81	D	2,136	-11%	1.08	F
P.M. Peak Hour	Southwestbound	2,084	0.70	C	1,904	-9%	0.96	E

As shown above in **Table 4-1**, the segment of Grant Line Road between Bond Road and Sheldon Road at 4lanes wide would operate at unacceptable LOS with buildout of the Proposed General Plan. Traffic volumes on Grant Line Road at a width of 4 lanes would be 3 percent to 11 percent lower than volumes at a width of 6 lanes. However, the 4-lane width would have one-third (i.e., 33%) less capacity than the 6-lane width. During the A.M. peak hour, with the reduced capacity of a 4-lane width, this segment would operate at LOS D in the northeast bound direction, and LOS E in the southwest bound direction. During the P.M. peak hour this segment would operate at LOS F in the northeast bound direction, and LOS E in the southwest bound direction.

The analysis of traffic operations with Grant Line Road at a 4-lane width confirms the need to widen Grant Line Road to 6 lanes. A 4-lane width would result in a bottleneck in the Sheldon area, effectively reducing the capacity of Grant Line Road, not only in the 4-lane portion, but also in the portion of Grant Line Road “upstream” of Sheldon. The effect of this bottleneck would be similar to the “zipper” streets that now exist in portions of the City. A 4-lane facility would also still require additional right-of-way and would result in some of the environmental effects identified in Draft EIR Table 4.5-9. The traffic impact would be expected to be worse if Grant Line Road were assumed to remain in its current design as a two-lane roadway with buildout of the proposed General Plan. Thus, these alternatives associated with roadway size reductions would result in worse traffic impacts than the proposed General Plan.

Traffic Calming Alternatives – The Sheldon Community Association (see Comment Letter 2) as well as other commenters have suggested the use of traffic calming features to improve the operation of Grant Line Road and minimize the need for widening of the roadway. These measures generally include installation of traffic signals, spreading of traffic to other

roadways (Waterman Road, Bradshaw Road, Bond Road and Calvine Road), signage, speed control, restriction on widening of Grant Line Road through the community of Sheldon, pedestrian improvements, transit, prohibition on high speed rail through the community of Sheldon, traffic system management methods (e.g., use of movable barriers to utilize three lanes of traffic for peak hour traffic direction conditions while maintain one lane for the other direction of traffic). While several of these measures would result in localized improvements in traffic conditions, none of these measures would provide for adequate LOS operation of Grant Line Road in absence of the 6-lane roadway facility. The proposed General Plan already designates Waterman Road, Bradshaw Road, Bond Road and Calvine Road as major roadways with 4 to 6 lane capacities in order to accommodate anticipated traffic (Draft EIR Figure 4.5-3).

Environmental Effects of the Widening of Grant Line Road

Several comment letters suggest that the Draft EIR failed to consider the environmental and quality of life effects of the widening of Grant Line Road. The Draft EIR Sections 4.1 through 4.13 considers the direct and indirect environmental effects of the adoption of the General Plan, which includes the impacts associated with roadway improvements identified in the General Plan's proposed roadway network. Draft EIR Table 4.5-9 specifically lists the anticipated environmental and land effects associated with widening Grant Line Road within the City, while Draft EIR Table 4.6-13 identifies anticipated traffic noise levels along Grant Line Road with buildout of the General Plan and roadway widening. In addition, the Draft EIR does identify the community of Sheldon and the surrounding area along Grant Line Road as being sensitive for cultural resources (Draft EIR Figure 4.11-1). While several commenters note that widening Grant Line Road will impact the quality of life in the community of Sheldon, social effects are not considered physical effects on the environment that are subject to CEQA (CEQA Guidelines Section 15131).

3.4.2 DETAILED ANALYSIS OF TRAFFIC LEVEL OF SERVICE

Some commenters requested detailed LOS analysis of certain roadway facilities in the Planning Area. This included LOS analysis of intersections, LOS analysis of freeway interchange ramps, and analysis of freeway segments using specific detailed analysis approaches. LOS analysis at the level of detail requested was not provided because of the geographic scale of the analysis and the planning-level nature of the project.

The geographic scale of the analysis included the entire Planning Area. While it is common for detailed LOS analysis to be conducted for traffic studies of specific projects, or even specific plan areas, the magnitude of the entire planning area results in such detailed LOS analysis being considered infeasible.

The requested detailed LOS analysis requires relatively precise knowledge of detailed traffic characteristics (e.g., turning movement traffic volumes at intersections). This type of data can be developed where specific information about a project is known. Therefore, it is common for traffic analyses of specific development projects to include this detailed LOS analysis. The City's General Plan, however, is not a specific development project. Because of the planning-level nature of the General Plan, data on the relatively precise traffic characteristics is not available.

The City acknowledges that detailed LOS analysis, if appropriate and valid, would be desirable and would add to the amount of information available. The City also acknowledges that numeric calculations for the detailed analysis could be prepared. However, the City believes the numeric calculations would give a false impression of the precision actually achievable. The

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City believes the detailed calculations would imply a level of precision that exceeds the actual level of precision possible with a planning-level project. The traffic analysis provided in the Draft EIR is based on the development of a new traffic model for the City that is based on SACMET 01 that models both daily and peak traffic conditions in the region, which is utilized by the Sacramento Council of Governments. The LOS methodology utilized by the Draft EIR is based on the City of Elk Grove Traffic Impact Analysis Guidelines that were adopted from Sacramento County. These guidelines utilize the highway capacities set forth in 1985 Highway Capacity Manual, which is more conservative than the more recent 2000 Highway Capacity Manual.

For the reasons described above, the City believes the LOS analysis presented in the Draft EIR is appropriate for the General Plan project, adequately discloses the impacts of the project, and avoids giving a false impression of precision.

3.4.3 BIOLOGICAL RESOURCES ANALYSIS

Several letters have suggested that the extent of analysis that was done for the Draft EIR was inadequate to accurately summarize the biological resources and impacts of the General Plan would occur in the City and Planning Area boundaries. Specifically, several commenters noted that the Draft EIR should not have relied solely on the results of records search of the California Natural Diversity Data Base (CNDDDB) and a single day of fieldwork referenced in the Draft EIR.

As described in the proposed General Plan and the Draft EIR pages 4.0-2 through -11, the proposed General Plan regulates development within the existing City limits. The City's vision of the Planning Area (land area outside of the current City limits) is specifically noted in the Elk Grove General Plan Land Use Concept Map (Draft EIR Figure 3.0-7). As shown in Draft EIR Figure 3.0-7, the City's vision for a majority of the Planning Area is to retain the existing land use conditions (with the exception of the Urban Study Areas), which is reflective in the impact analyses of the Draft EIR. The proposed General Plan does not specifically identify that the Urban Study Areas are to be incorporated into the City and urbanized and are thus not designated with any specific urban land uses. The General Plan simply identifies these areas as land areas that should be carefully studied prior to consideration of development. However, for purposes of the cumulative impact environmental analysis, the Draft EIR assumes that these areas could be annexed and urbanize after buildout of the City. The Draft EIR does evaluate the potential direct biological resource impacts associated with the potential development of the Urban Study Areas as well as the indirect impacts to biological resources in the Planning Area (including the Stone Lakes National Wildlife Refuge and the Cosumnes River Preserve) as significant and unavoidable (Draft EIR pages 4.10-43 through -47 and 4.10-51 through -56). However, the City is not proposing any development within the Planning Area that would result in direct impacts on biological resources in the Planning Area. Thus, it is not necessary for the Draft EIR to provide an extensive analysis of biological resources in areas where no impacts are expected to occur. CEQA Guidelines Section 15125(a) specifically notes that the description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the project.

Draft EIR pages 4.10-1 through -5 provide a description of habitat conditions that occur within the City as well as the Planning Area and Draft EIR Tables 4.10-1 and 4.10-2 describe potential special-status plant and animal species that could occur in the area. This analysis includes utilization of the CNDDDB, technical reports referenced on Draft EIR pages 4.10-56 and -57, review of aerial photography, and use of biological resource assessments conducted in the City (e.g., Laguna Ridge Specific Plan Revised Draft EIR, Lent Ranch Marketplace Draft EIR, East Franklin Specific Plan Draft EIR). The one-day field reconnaissance was solely meant to ground truth to certain unknown areas of the urban limits. Foothill Associates (biological resource consultant for

the General Plan EIR) relied on aerial photography and extensive amount (over seven years) of project experience to document the vegetation/habitats and potential for special-status species occurrence within the City and overall planning area. On projects within the City limits, Foothill Associates biologists have logged over 200 field days in the past seven years.

3.4.4 AGRICULTURAL RESOURCES

Several comment letters expressed concerns regarding the loss of farmlands as a result of implementation of the General Plan. Specific concerns regarding the adequacy of the analysis provided in the Draft EIR are summarized and responses are provided to each issue.

Draft EIR Impact and Mitigation Analysis is Inconsistent with the Requirements of CEQA

Several comment letters expressed the concern that the Draft EIR's determination of no feasible mitigation available to fully or partially mitigate the loss of agricultural land violated the requirements of CEQA. Draft EIR pages 4.1-15 through -23 describe direct, indirect and cumulative impacts to agricultural resources from implementation of the proposed General Plan as required by CEQA. Draft EIR pages 4.1-17 through 4.1-18 provide a detailed analysis of various mitigation measure options (protection of existing farmland within or adjacent to the City, preservation of existing farmland areas within the City and creation of new or improved farmland to offset impacts) and why these measures do not meet the definition of "mitigation" under CEQA Guidelines Section 15370, would not provide even partial mitigation of the impact and/or is considered infeasible by the City (the City is not required to consider infeasible mitigation measures under CEQA). The analysis and conclusion of the Draft EIR that no feasible mitigation measures are available for the loss of agricultural resources is supported by the recent case law (*Friends of the Kangaroo Rat v. the California Department of Corrections*).

Failure to Consider Farmland Preservation Programs Used in the Region and State

Several comment letters cite that several local jurisdictions (including the City of Elk Grove associated with the East Franklin Specific Plan) utilize agricultural mitigation programs to protect existing farmland through the purchase of land and/or easements. As described on Draft EIR page 4.1-17, farmland preservation programs such as the program established by East Franklin Specific Plan by Sacramento prior to the incorporation of the City of Elk Grove is not mitigation as defined by CEQA Guidelines Section 15370 and recent case law (*Friends of the Kangaroo Rat v. the California Department of Corrections*). This same analysis would apply to similar preservation programs established by Sacramento and Yolo Counties as well as the Cities of Sacramento and Woodland.

Conflicts with the Determinations Made in the Draft EIR and Proposed General Plan Policies

Several comment letters noted that while the Draft EIR identified that there was no feasible mitigation available to fully or partially mitigate the General Plan's impact on agricultural resources, the proposed General Plan includes policies regarding the preservation of existing lands outside of the City. The Draft EIR does identify General Plan Policy PRO-5, which supports the establishment of open space areas to address needs that include maintaining agricultural uses, wildlife habitat, recreational open space, aesthetic benefits, and flood control, and PRO-5 Actions 1 through 3, which would implement Policy PRO-5. However, while these actions include consideration of a program to fund open space, working with other agencies to develop a regional open space plan, and consideration of funds available to fund the open space program, these actions are not considered mitigation under CEQA for the loss of agricultural lands as they would not replace lands developed under implementation of the General Plan

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and, thus, are not counter to the conclusion in the Draft EIR that there is no feasible mitigation for the loss of agricultural land. As discussed in the Draft EIR, preservation of existing farmland would not replace or avoid the loss of farmland that would occur with the development considered under General Plan.