

I-110 Ashley Dummer (3)

Comment Letter 110

Dear Ms. Smith:

Thank you for the opportunity to respond to the Draft Environmental Impact Report (EIR) for the Newland Sierra Development. After reviewing the document, I have a list of questions and concerns outlined below:

General:

The public should have adequate time to review a document which has over 8,000 pages and is poorly compiled. How does the County justify providing only 45 days? To place this in perspective the public would need to read an average of 178 pages a day to be able to read the EIR.

Even with the length of the report, information was not included with the EIR. How is the public supposed to review content of the EIR if it cannot be found in the document?

Transportation and Traffic:

The EIR on 2.13 considers Buena Creek Road and South Santa Fe Avenue intersection as having significant impacts but are unavoidable. However, in 2.13-7 goes on to list the addition of a dedicated right and left lane as mitigation. Will be the development be providing this partial mitigation? How will this provide any mitigation as sprinter tracks make vehicles stop prior to the intersection (see image below) and the their does not appear to be adequate space to add the turning lanes. Also the rails to trails should be included in the analysis.



Image is from Google Maps taken on August 9, 2017

For the entire Buena Creek Road the EIR considers the impacts significant and unavoidable. I disagree with this assessment since impacts are unavoidable, as the project can mitigate them there is just a cost associated with doing so. If the developer does not provide adequate mitigation, this just places the burden on the tax paying citizens to later correct the issues.

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Section 2.13 references Newland Sierra having a shuttle to the Escondido transit center. However there is no detail on how many vehicle trips this will eliminate. How often the shuttle will run and the impacts from potentially other people coming in from outside areas to use the park and ride facility purposed. Please provide additional information regarding the impacts to traffic with a shuttle service, so the impacts can be evaluated.

Section 2.13 references bicycle and pedestrian facilities being used only as a reduction to internal vehicle trips. How does help eliminate traffic in the surrounding area?

Water:

Section 2.14-15 references that Metropolitan Water District gets water from the Colorado River Water through the Center Valley Water aqueduct system; however the EIR does not provide any detail on how the Newland Sierra project will get Colorado River Water via the Central Valley Water aqueduct system. According to the USBR website, the Central Valley water aqueduct system currently ends in Bakersfield and is supplied with water from the San Joaquin River and Sacramento River.

The EIR references the Safe Drinking Water Act and the recycled water standards as being administered by the California Department of Public Health; however it is my understanding that the State Water Resources Control Board, is responsible for administering the Safe Drinking Water Act and the recycled water standards. The California Department of Public Health is responsible for Food and Drug, which includes bottled water and hauled water serves. However the EIR does not discuss how Newland Sierra is going to haul water or provide bottled water to all of the homes. Please include details on the hauling/ bottle water operations detailing the additional traffic impacts.

2.14-34 references water demands are based on open space use, however I could not find what the open space demands were based on.

2.14-34 references the need for a 1.76 million gallon tank; however it goes on to assume the addition of a 2 million gallon tank. What is the justification for getting credited with an additional 0.24 million gallons worth of storage?

2.14-35 references water demands for the project are 5.43 million gallons, however I could not find what the demands were based on.

2.14-36 references that the proposed grading plans could be found in the EIR. Where can these be found?

2.14-36 references that the impacts to Vallecitos would be less than significant to the existing water system. However, I am not sure how this is considered a limited impact as the effects on the water quality of the existing infrastructure were not considered with the of the additional storage and pipelines. Furthermore, as Newland Sierra is not providing any additional water to Vallecitos Water District, at the very least the addition of the Newland Sierra project will have a significant impact on the water demand.

2.14-40 references that Vallecitos Water District will not be subject to any state mandated water reductions through January 2017. However this has no relevance on the project as the EIR was not even out prior to the January 2017, let alone serving water to any homes. Please provide a date in the future.



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Wastewater:

2.14-59 references that Vallecitos Water District does not have adequate capacity to serve the project nor are they part of the capital facility plans. The EIR goes on to state that this is a less than significant impact, however it seems like not having adequate wastewater capacity is a major concern for the area.

The EIR does not provide any details on the impacts to the wastewater treatment facility, and any improvements that will need to be made with the additional capacity.

Schools:

3.5-18 references that the schools are already severely impacted and cannot accommodate the additional students. The EIR determines that this is a less than significant impact. How is this a less than significant impact to the students of the school? How will you accommodate all of the new students while maintaining the same student to teacher ratio? How will you afford the children the same educational opportunities?

Fire:

Appendix N 6.2 Evacuation Plan only notes that a evacuation plan has been created and was prepared with the DSFPD and SDCFA. The EIR is incomplete without this information. Please provide the plan as the response.

Law Enforcement:

3.5-23 states additional demand would be placed on law enforcement however the proposed project would not add any additional law enforcement. Based on my experience the law enforcement is already not adequately staffed or funded. How is this additional demand considered to be a less than significant impact? How does a development with the same population as the City of Del Mar not justify the additional law enforcement resources?

Based on the EIR ominous noted above, how does the county justify not reissuing the draft EIR for another public comment period?

Finally, after 10 years of meetings between County residents and staff, not to mention the millions of the dollars spent on the development of General Plan, the County Board of Supervisors approved the County General Plan. When the plan was approved, the Supervisors not only agreed this area to protect this area from over-development, but they agreed to downzone the entire property to 99 units from 200 units. In an effort to support and respect the integrity provisions of the General Plan, I urge you to recommend against the Newland Sierra Development and continue to safeguard this sensitive rural corridor.

Thank you for your consideration,
Ashley Dummer, P.E.

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