

I-258 Ellen Maisen

Comment Letter I-258

1) How could the Sierra Newland project be part of the "Specific Plan" for San Diego County when it did not exist at the time the plan for that area was created? I-258-1

2) How can a development be "carbon neutral" when it does not include any transportation system for its residents and visitors that precludes their need for automobile use? I-258-2

3) How does this "Reinforce the character of existing communities"? I-258-3

"While community design and functionality have evolved over the decades, one thing has remained constant—Newland's core values of caring, commitment, and integrity. They guide everything Newland does, and how every community is created. No two are alike—each is uniquely designed and created after understanding the needs of the greater community and the people who will live there.

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We look forward to continuing our work with nearby residents and future homebuyers to create an exciting new community here in the North County—one that enhances the quality of life for everyone." Taken directly from the webpage advertising the development. This is complete and utter disregard for the community. The EIR proves it hopelessly false!

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The general plan adopted for the county and especially this area allows for some development. This project is a massive change to that decision. Also, why do your officials call this "smart growth" because it "clusters" development? This is NOT what smart growth means. Smart growth means building communities where resources needed exist to serve them, for example water resources, sewage infrastructure, electrical generation infrastructure, transportation infrastructure. Building thousands of residences on land next to a freeway does not provide transportation infrastructure. When there is no other way in or out, it's a very dangerous idea, especially when you are allowing that building in a "high fire risk" area. Having no transit available requires residents to drive their own autos which guarantees gridlock on the one freeway. Increasing density in a city center where there is rapid transit and communities are walkable, so there is no need for personal autos makes sense. Increasing density in rural areas

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without those resources does not. There is also a limited amount of water available, increasing density by thousands of families is not going to provide those extra resources, it is going to stretch to the breaking point the current supply.

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As a small organic farmer in Valley Center, I am looking at this possible project with dismay. I feel that as a resident and landowner in an unincorporated area, I really have no representation. The county planners should be taking the quality of life of the residents into account as they make decisions about development. We have invested our life savings into this business, and after 5 years we are starting to see signs of recovering that investment. Whether we are able to conduct our business in this area will be dependant upon the good management of others at the county level in the next few years.

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As I have been managing and improving this land and growing crops since 2012, I have been a good steward of the property. We worked very hard and invested a significant amount of our savings in developing the business, believing that the general plan was going to be the guideline for development in this area. We applied for and maintain organic practices to further improve the soil and the watershed. I believe our business is providing value to the county of San Diego. Yet, now I find that I cannot trust the county to keep it's word about development and changes to the area which directly impact my daily business and life. This is the third major project of its type to be considered that I know of, and I am sure there are more that I am not aware of. I do not understand why these outrageous plans are even considered given that they do not reflect the good planning efforts of those who worked on those general plan and amendments. It does not consider at all the ramifications to the surrounding area. The adopted general plan does not allow a development of this size in the proposed area. There are many good reasons why this is going to make daily life for the residents and business owners much more difficult, and even dangerous in emergency situations.

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Traffic: I have been keeping a record of the traffic since I went to the meeting held in San Marcos in July, and on most days, there are slow downs and traffic flow alerts from the Twin Oaks area to Temecula. Especially during what is considered the afternoon "rush hour". The situation is already difficult for residents. I know that I cannot reasonably expect to travel north of my property using the I-15 in the afternoon rush hours from about 2 pm to 6 pm. That means no deliveries of produce from my business, no shopping trips for supplies. Adding a major development with over 2100 homes and no other main artery except the Interstate 15 will not improve these already existing problems. Widening Deer Springs Road will only compound the amount of autos emptying onto the freeway at that point creating traffic flow problems north, south, east and west of the development. The roads on both sides along the freeway will also be impassable. When the new Palomar college satellite just a few freeway ramps above the proposed development is open later this year, there will be a massive increase in traffic on the I-15 and surrounding feeder roads. There are also four other new planned residential developments planned for the corner of I-15 and Hwy-76.

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The August 6, 2006 Board of Supervisors report states that "there is enough capacity on Gopher Canyon to accommodate excess flow" ... that is simply incorrect as current traffic conditions in the weekday afternoons on Gopher Canyon have become difficult at times and even before the current construction required waits both West bound and East bound. The curved and modulating character of Gopher Canyon make lines of

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autos at a stop dangerous as drivers cannot necessarily see them forming in time to slow sufficiently from the traffic speed. This is due in part to recent construction of multi-family housing in Vista that use Gopher Canyon as an access route.

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Most importantly and shame on the county and Cal Trans for allowing this to develop, there is no plan for evacuating the residents of the new development should a fire or other area wide emergency occur.

The county created a document that states that the project would improve fire safety in the proposed area. How? How does building inadequate roads for evacuation, adding homes which would be more of a burden for the fire agencies to manage, not providing adequate funds for fire protection in an area of significant hazard, and not providing a general plan for an evacuation do this?

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<http://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/Newland%20Sierra/Newland%20DEIR/Statement%20of%20Reasons%20MRZ-2.pdf>

Improving Housing

That same document claims that this would help the county meet its housing needs. No, it would not, because people that move to an area do so with some need for employment or jobs. This is not an area that would provide for their needs. This is not the area where the county needs housing, it is actually closer to the urban centers where housing is needed. This approach is creating more problems that are not being solved by the developers. The people who move to these UNINCORPORATED areas tend to do so for the rural nature of the area. We moved here to run an agricultural operation, and I'm sure there are others who have done the same thing here. We provide a valuable service, as growing food is an important part of supporting the economy and the population. If all of the rural areas are urbanized there will be no room for agriculture. The plan that was developed for this area does not support the project proposal. What is needed is a responsible approach to siting population, in areas where the needs of the people moving into the new homes can be accommodated. "Smart" growth is not based on numbers of buildings but rather intelligent use of connections to resources that already exist. There are no shopping facilities in the area, no schools, no fire station, no sewer connections, no transit hubs, no electrical generation. There is only one major connecting artery for traffic, and no mass transit for the numbers that these types of projects would generate.

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Biological Core Area

In the same report it is stated that "the biological core area cannot be moved or mitigated", yet at the July 2017 meeting in San Marcos, it was stated by several people and I read in the Newland Sierra Materials that there was going to be mitigation and "trading" of parcels in Ramona for those to be damaged in the Newland Sierra site plan. This is a contradiction of county EIR promises. Again, it is very disheartening to have proof that the county does not stand by it's promises to the citizens, and is willing to trade one set of biological ecosystem resources for another, when it claims that it cannot do that in a published document. If the county employees represent the interests of the citizens, why is this happening? I am not familiar with the animal resources in Ramona, but I have seen bobcats in the area from Deer Springs to Gopher Canyon, and this is a sign that there is a significant habitat resource for medium sized predators, a population that is not numerous anywhere in the country. I have noticed since the increased activity of large trucks (due in some part to the Moon Valley operation which has increased its land use and large equipment use in the area on both sides of I-15 at and south of Deer Springs, the bobcat I have witnessed

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have been much fewer. Smaller animals like roadrunners seem to have increased, but hawk, vulture, snake, bobcat, coyotes, screech, barn, and "hoot" owl activity has decreased. The more urbanized the area becomes, the less room there will be for the small mammals, birds, and insects that are a part of this area. Since this area has a designation that requires protection of these resources, I suggest that the county not allow the density of this development in order to maintain the diversity of the biological resources of the area. I also disagree with allowing the Newland Sierra project to be part of the Draft Plan when it has not been approved by the county first. If this confers some sort of benefit to the project or limits their responsibility to the public environmental requirements it is against the public good. In section 2.4 there is repeated acknowledged "significant" impact to various species. Especially the raptors, from damaging their foraging habitat to killing eggs and birds. This is unacceptable. Why is this being allowed? Loss of habitat connectivity, loss of wildlife corridors, significant noise and light pollution from human activity, The RPO should not be amended to allow "significant" "permanent" changes to the area that impact wildlife. If this is a "Resource Conservation Area", significant permanent negative impacts should not be allowed. A wildlife biologist monitoring the destruction of the habitat and the permanent loss of foraging and movement is not going to alter that negative impact. I am dismayed by the lack of respect for the resource that this document was written with. I do not see any mention of the animals that I have mentioned in the EIR, but again, it is 8000 pages, I may have missed it, I will try to read the entire document after the comment period is over.

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Health concerns:

The rock crushing and blasting activities would pose significant health risks to many communities in the surrounding area. It would also not be in compliance with California Clean Air Act, Air quality standards and other legal requirements for industrial activity. It would pose significant soil and water contamination, and interfere with agriculture. There are many farms in the surrounding area and they have a right to expect that their soil, water, and crops will not be contaminated by these type of activities. Page 7608 speaks of significant dust impact, significant water pollution impacts. It is strange that the statement "it would be consistent with the North county plan" is in this section. Nothing about this project is consistent with the North County General Plan. I do not see blasting schedules, so it is difficult for me to know how this will impact my operations and health. I do not see plans for the widening or changing of the intersection at Deer Springs, so I cannot know how this will impact me.

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The increased traffic and especially idling automobiles will cause localized pollution events and health risks to residents which exceed the standards for air quality. Due to the nature of the terrain, the exhaust will tend to be trapped in lower areas where homes tend to be and increase the incidence of respiratory disease and death from air pollution.

Schools: Because the plan is split between two school districts, there are no plans for added schools. This will be a burden on the infrastructure of both districts. It may work out as enrollments are declining, but it could just as easily result in overcrowding and delays in funding. Large local population changes are difficult for schools to adjust to. These situations can harm students. These things also factor in to property values. Increasing student population will also add to the costs for buses and transportation, require adequate funding and planning and increase the traffic on the I-15.

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Fire protection:

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When we bought our farm, we were in for some years of reminder about just how dangerous this area can be. There are remnants of burned stumps all over the perimeter of the property. We live on a hill overlooking a canyon, and it would be easy for a fire to be driven by the wind through the area very quickly. There are no nearby places to call for help, the cell phones reception is poor due to the terrain, and we know we are on our own here. I have been here working outside under a rain of ashes from nearby fires. We had our faces covered with cloth but we had to water to make sure we didn't lose our grove in case the fire came our direction. We have been trapped on the I-15 when there was fire roaring overhead near the project area. It crossed the freeway and the traffic was stopped by the fire crews on both sides because they didn't know what direction it was going to go. I remember one night coming down to water the avocados, (we came down on the weekends after working all week in Los Angeles area) there were fires all over the 78 on the way east to Valley Center. There were glows all over the hills from small fires. I thought the world had gone crazy that night, because a lot of those fires were set by people.

According to a city consultant, it costs \$12 million dollars to build a new fire station with a four person engine crew. A two person paramedic team costs \$700,000 per year. Why isn't the developer paying for this necessity? If it is not provided with the development it is not a community where people can live safely without posing a burden to the rest of the area's resources.

In an area that is "serious fire hazard zone" there is no plan for how that development will get fire protection. Remember the Cedar Fire, the Station Fire and how many others? Allowing this much development without building at least 5 fire stations to protect the structures and residents is criminal neglect. I see that the plan is offering \$1-2 million to pay for fire protection, but that is not enough to build the number of fire stations that will be needed for a community of that size in this area in this terrain, with the specific fire hazard mitigation needs. Remember even wireless signals do not transmit effectively in hilly terrain. Fire crews have died in previous fires. The burden on Cal Fire for this area is already too great. Dispatchers are reporting that there are not enough resources to meet all of the needs just for traffic and safety in general. (In San Diego county). This kind of development which seeks to add on chunks of population without services endangers the whole northern end of the county. There must be dedicated fire stations with equipment and trained staff. This is an ongoing budget item for the area and it will come from where? I will also contact Deer Springs Fire Services about this. Families died trying to escape from the Cedar fire, there were not enough staff, equipment or roads to allow them to get out safely. This area could be a death trap in another Santa Ana driven fire which cannot be controlled or contained. With climate change there will be increased capacity to build the winds and flames due to weather conditions. There will be more of these extreme fires. A rural area does not pose the same risk to the fire crews that clusters of homes and buildings do, and even as the developers claim there will be decreased risk, since they have no evacuation plan and no services that is a false promise. The county is not prepared to manage this type of risk long term.

<http://www.voiceofsandiego.org/topics/news/fact-check-the-real-cost-of-a-four-person-fire-crew/>


On page 7608 of your report it states that there would be significant increase in fuel load leading to increased danger of extreme fires. This directly contradicts what has been reported to the community.

The County housing

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Yes, this will increase housing, but in an unbalanced way. The supply of higher priced homes will be increased, but not an adequate amount of lower cost "starter" homes, and low income housing. The people who move into higher priced homes tend to have more cars, and indeed to get around in this area they will need one car per adult because there is not adequate mass transit for them to use. This will only increase the traffic congestion. I think that we do need more housing in this county, but this project is not going to help the areas of the county where the housing is most needed. It will not be any kind of solution for the general lack of housing. It will encourage the wrong kind of unplanned disjointed growth that is difficult to manage long term and decreases the quality of the lives of the citizens. We need intelligent plans that link areas together in common ways, sharing resources. I also feel strongly that the way this was presented, and not adequately noticed to residents who will be affected, is going to lead to dissatisfied residents and more frustration with the county. It is more proof that without a local government the citizens have very little recourse to poor decision making by the county representatives. As a resident of unincorporated Valley Center, I realize that my concerns, my rights, are likely to be pushed aside for the interests of those who stand to earn a very big paycheck and walk away, leaving the residents like myself and the county to try to make sense of the mess that will be left behind. I am very concerned about the large number of inconsistent statements on the EIR. And not being employed by the county of San Diego, I could not read the whole 8000 pages, which is most likely why there were 8000 pages to contend with. I would have felt that I was given the right to participate in this process, if more time was given to the process. This was not a fair public hearing.



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