

I-262 Byron Marler

Comment Letter I-262

Byron Marler  
e-mail: marlerstorm1@gmail.com  
Tel: 760 639-9186

25147 Rue De Fleur  
Escondido, CA 92026  
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Ashley Smith, Project Manager  
Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123.

**Newland Sierra PDS2015-GPA-15-001; PDS2015-SP-15-001; PDS2015-REZ-15-001; PDS2015-TN-5597; Draft Environmental Impact Report**

Dear Ms. Smith:

My thanks to you for the opportunity to comment on this project. I find the draft EIR to be inadequate because reasonable alternatives that would mitigate the environmental and human impacts have not been studied with due diligence and an attitude of “could we make an alternative work to reduce the impacts” as follow:

- Other suitable locations: The project proponents use the designated with Village as an absolute requirement for a viable project, whereas existing retail and service centers located near other land parcels are not considered as equivalent to Village. This project could be divided into several smaller project areas using smaller parcels of contiguous land at separate locales with existing nearby village centers in North County. Such a divided group of smaller projects might provide similar numbers of housing units with similar mix of the proposed housing types. The impacts of construction and operation of the same number of housing units would thus be spread over a larger regional spatial range. Smaller projects cause smaller impacts both in time and localized quantity. “Significant, unavoidable impacts” can be reduced or eliminated by dividing this large project into smaller, regionally spread-out projects. In some cases existing infrastructure and services would likely accommodate the increase in traffic and human service needs. The project proponent did not approach this with an attitude of “could we make an alternative work to reduce the impacts”. Or perhaps the proponent did not fully describe the effort made, nor provide a list of properties that might fulfill the number of housing units desired where existing village centers are nearby. The evaluation efforts implied by last paragraph on page 4-7 of Project Alternatives needs greater detail to assure decision makers that due diligence has been applied.
- The existing project proposal concentrates the human and environmental impacts in one traffic bottled-necked location (Deer Springs Rd and adjacent I 15 interchange); and where air quality, noise, and other impacts will be imposed on adjacent neighborhoods during a 10-year period. The Draft EIR states that certain impacts are significant and unavoidable. The project proponent does not offer solutions toward impact reduction. They do not consider alternatives with an attitude “we could make it work to reduce impacts.”

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- The proposed project area is one of the most topographic contentious settings possible. It will require large amounts of construction capital to make it suitable for housing development. These amounts of construction capital will be added to the costs of the houses thus reducing the affordability of the units. Other suitable locations discussed above in the multiple smaller projects comment offer potentially large savings on site preparation costs relative to the proposed site, and this can reduce the costs of the housing units making them more affordable.
- Project alternatives involving roadway alternatives (Newland Sierra Parkway Alternative scenarios) are not given due diligence with an attitude of we could make it work to reduce impacts. For example, modifications to accommodate biological migration are not considered in any of the roadway alternatives.
- The project proponent must offer better environmental monitoring toward protecting the human health and property values of adjacent neighborhoods east of I-15. Continuous air quality and noise monitoring near Champagne Village and/or Deer Springs Rd. private co/op community homes (at Mesa Rock - Deer Springs Rd intersection) is needed to achieve this goal. As the project currently stands, the burden falls upon the existing residential community to monitor environmental impacts and seek enforcement from the County for a long period of 10 years.

It seems that the CDFW alternative proposals are viable in terms of reducing the impacts of the proposed project. Incorporating the CDFW alternatives along with some smaller projects in other locales could achieve the desire project goals.

Thanks very much for your consideration of these and other issues relating to the proposed project.

Yours truly,



Byron Marler

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