

## I-321 Kasturi Rangan

Comment Letter I-321

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

Dear Mr. Wardlaw:

My thanks to you for the opportunity to comment on this project. I comment below on the unsuitability of this project for the proposed location because of:

- Significant effort and enormous environmental impact for re-grading the mountainous terrain to accommodate 2135 homes. The terrain is obviously not suited for such development.
- The long list of 15 significant environmental impacts and the poor mitigation measures to minimize such impacts.
- The burden on the existing residential community to monitor environmental impacts and seek enforcement from the County for a long period of 10 years.
- The combined effects resulting from simultaneous road and ramp building activities at Deer Springs Road and I-15 and the constructions site's blasting, crushing, and regrading

I-321-1  
I-321-2  
I-321-3  
I-321-4  
I-321-5

activities would be intolerable for not only the local residents but all drivers who must use these roads.

- A large housing project in a single water district can cause a lot of water restriction issues for existing users.

I elaborate further, below:

This project obviously seeks to change the zoning of the area which is currently designated as Rural Residential as per the General Plan that was finalized in year 2011. The draft EIR shows that there will be 15 significant impacts that result from this development. The imposition of such impacts on current residents in and around the proposed construction site for a 10 year period would be a devastating burden for them to bear. The developer seems to believe that they should be given many years to hack the terrain into shapes that can accommodate 2135 homes while the local residents suffer and accept the environmental impacts. Why should current residents in the area put up with such a long period of blasting, rock crushing, and regrading? The simple resolution for this issue is that the terrain is unsuited to development of such a large housing complex and therefore the developer should be denied a permit that is not in accordance with the original zoning of the General Plan. In fact, a similar housing project known as Merriam Mountains was turned down by the County officials several years ago and rightly so. For such a large housing complex, the developer should seek another site which is more level and open.

The mitigations proposed by the developer for many of the significant environmental impacts are very inadequate. In Air Quality discussions, reference is made to a monitoring center located in East Valley Parkway which is many miles away from the construction site and therefore incapable of registering any of the impacts that local residents would experience. The draft EIR also comments on the use of a certified opacity observer once in 30 days to observe the dust emissions from rock crushing operations. This seems completely inconsistent with the sophisticated technology available today.

We recognize that the County has limited resources for monitoring the site development and construction process and for enforcement of regulations or agreed upon mitigation methods. The burden for notifying the County authorities for such violations would fall upon the existing residential community with potential for frequent disagreements with the developer and associated personnel. A simple example of a violation could be the non-use of water for minimizing dust from rock-crushing machinery until a complaint is made. Should the residents be subjected to this form of tension for the entire time that the developer goes through the 10 year construction period?

Simultaneous activities such as expansion of Deer Springs Road to add more lanes, widening of ramps from/to Deer Springs Road from I-15, and the site blasting, crushing, grading etc. would create an enormous cumulative burden of traffic issues, noise, dust, and other emission issues. This, in itself, should be a strong deterrent to permitting this project. If there is any sequencing

I-321-5  
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I-321-6

I-321-7

I-321-8

I-321-9

I-321-10

I-321-11

## Comment Letters

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of these project activities that would relieve some of these impacts, obviously the road work should happen first. Perhaps this timing would not suit the project and this would be all the more reason for the developer to consider an alternative site.

The addition of such a large quantity of homes to one water district places a burden on it and the current customers would probably be assigned penalties to reduce their consumption to accommodate the new residents. Given the water situation in Southern California, perhaps it is no longer possible for a single water district to accommodate such a large housing development. This is one more reason why the permit for Newland Sierra's current proposal should be denied.

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

Yours truly,

Kasturi Rangan.

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I-321-12

I-321-13

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