

I-348 Mark Seebach

Comment Letter I-348

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From: m. seebach [mailto:seebachm2@aol.com]  
Sent: Wednesday, August 09, 2017 8:49 PM  
To: Smith, Ashley  
Subject: Comment Draft EIR Newland Sierra

The Newland Sierra DEIR does not address Endangered species. At present the CA Gnatcatcher and Fairy Shrimp live in the proposed construction zone. What provisions will the developer take to save these areas that are home to endangered species?

I-348-1

The DEIR does not address what entrance/exit ramp designs are proposed for the I-15 north and southbound at Deer Springs Road.

I-348-2

According to the city's general plan, the Merriam Mountains contain primary ridgelines. But the mountains, which span 850 to 1,450 feet in height, sit in an unincorporated part of the county, just north of the city limits in the Twin Oaks Valley area. The planning document calls for the preservation of those mountains based on the assumption that the city will one day annex the area. It is currently under the county's jurisdiction.

I-348-3

The health risk assessment does not evaluate health risks to residents outside of the project area. In some cases, there are existing residents closer to the expanded emission sources than the new resident receptors evaluated in the assessment. Many of these existing residents are seniors, some with increased sensitivities to air pollutants. As such, the health risk assessment appears to be incomplete. Why does the health risk assessment not consider nearby residents? What are the increased cancer and non-cancer risks to these nearby residents?

I-348-4

Even with mitigation, the project significantly exceeds thresholds for carbon monoxide (CO), nitrogen oxides (NOx), and particulates (PM10 and PM2.5) during the construction phase. In the third year of construction, NOx emissions are well over twice the significance threshold (590.12 pounds per day vs a threshold of 250), CO emissions are over three times the threshold (1,783.41 pounds per day vs 550), and PM10 emissions are over five times the threshold (516.46 pounds per day vs 100). How are the potential impacts of the exceedances evaluated within the context of the entire project? Does the San Diego Air Pollution Control District (SDAPCD) believe that these impacts are acceptable? What steps or measures will SDAPCD impose upon the project?

I-348-5

I-348-6

Basically the County tries to deal with the VWD supply shortage issue by asking, can the project achieve 35% to 52% savings in water use over the general plan (because those are the percentages needed to balance the supply deficit in VWD).

The County/Newland come up with a way to answer yes, based on Appendix T, the Water Conservation Demand Study. This study uses poor assumptions to justify the conclusion that the project can result in a 35-52% savings over the general plan. For example, the study uses water usage factors from the mid-1990s (which were much less efficient than today) and then in doing so is able to inflate the savings the project can achieve.

I-348-7

There is no link or evidence that the 1990s water usage figures accurately reflect actual usage or the water duty factors used in coming up with the projected water usage numbers. Common sense is that 1990s water usage figures are likely to be much higher than 2004-2008 actual usage or the 2014 water duty factors or the 2011 water usage plan, because technology was much less efficient back then. For this methodology to be reasonable and accurate, Newland should have looked at water usage figures that existed in 2011, or 2004-2008, etc. to base their projected savings. If they did that, however, it is likely they would not have been able to achieve the 35-52% reduction that the EIR uses as a threshold, because the technology in 2011, 2014, etc. would be much more efficient (lower water usage) than in the 1990s.

I-348-8

## Comment Letters

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The Newland Sierra DEIR does not address existing wildlife corridors that will be severed completely. Creating an island park or open space occupied by people, pets and traffic, does not address this loss of habitat for natural species. The DEIR does not mention the existence of vernal pools or species that live in them.

I-348-9

We do not want the rural character of the area destroyed by this development. Our quality of life, natural habitat, corridors and beauty of the mountains are on a developers chopping block. We STRONGLY urge the county reject this URBAN SPRAWL, leapfrog development and destruction of rural north county. Enforce our General Plan.

I-348-10

Thank You.  
Mark Seebach