

### I-368 D. Snider

Comment Letter I-368

August 4, 2017

Newland Sierra EIR Comments

County of San Diego  
Planning and Development Services  
5510 Overland Avenue  
San Diego, CA 92123  
Via email: [Ashley.Smith2@sdcounty.ca.gov](mailto:Ashley.Smith2@sdcounty.ca.gov)

Dear Ms. Smith,

RE: Newland Sierra Development Proposal and EIR

The Newland Sierra development proposal is not consistent with the 2011 General Plan. The General Plan took into consideration the future housing needs of the County, balanced that with environmental settings of each parcel and the process involved a collaborative, multi-year process with the public, developers, and other stakeholders. The General Plan did not identify Merriam Mountains for suburban-style residential development. Rather it recognized the environmental constraints and limited its development to approximately 100 homes (not including the commercial area near I-15). The constraints are made obvious when you consider that the Newland Sierra proposal will blast a mountain and move 10 million cubic yards. The EIR contains an addendum just to explain the need for roadway design waivers due to topography. Furthermore, the traffic study indicates that several roadway segments and intersections will operate at a LOS F and not be mitigated. I'm not sure why the County would even consider this development proposal that is so contrary to the General Plan that the Board of Supervisors recently adopted.

I-368-1

I-368-2

I-368-3

I-368-4

My comments regarding the completeness/adequacy of the EIR follow:

1. Page 1-1: The EIR states that its purpose is to preserve substantial open space and enhance native-habitat conservation. Development of 2,135 homes in an area that may become part of the PAMA is contrary to this stated purpose.
2. Page 1-1: The EIR states that its purpose is to create compact, sustainable interrelated neighborhoods consistent with the "Village" designation of the General Plan and support a network linked to regional transportation mobility options. The General Plan does not identify this area as a preferred location for "Village" designation. The development proposal includes isolated development areas (1594 homes) on the upper reaches of the Merriam Mountains and the local commercial at the freeway near the foot of the mountains which topographically discourages local walking. Provision of e-bikes may not be successful and may not be permanently funded. The area is not identified in SANDAG's Smart Growth Areas. Additionally, there is no guarantee that the non-residential areas will be developed. Note the phasing plan refers to the Town Center as Phase 2.
3. Page 1-1: The EIR states that its purpose is to construct public facilities phased concurrent with demand and support public services within existing service areas without burden or cost to existing residents, et al. The text of the EIR does not support this statement. For instance, refer to S. Santa Fe/Buena Creek/Robellini street improvements and the future need for additional water conservation measures to accommodate the development (see letters from Latham & Watkins).

I-368-6

I-368-7

I-368-8

4. Page 1-29/36: The EIR states that the Village regional category designation would remain unchanged from its existing configuration. The EIR assumes an upper limit of 81,000 square feet for the proposed project even though the lot could yield a higher square footage. For an accurate comparison, the EIR should reflect the same range of square footages for the proposed project and the General Plan alternative. Or at least be consistent with Tables 1-11 and 1-12 of the EIR. Not doing so makes it appear that there is no net traffic increase for the development proposal compared to the General Plan alternative even though the developer has increased the number of homes 22-fold. This does not appear to be an appropriate approach for an EIR analysis. I-368-9
5. Page 1-35: The EIR states that the existing General Plan would allow 1.8 million square feet of commercial/office professional uses. The County should explain why the land was designated as such in the 2011 General Plan. Without the background, one cannot analyze what the potential impacts may be. I-368-10
6. Page 1-35: The EIR states that the proposed project would increase the population of the area. The development proposal would allow suburban-style residential in an area that was determined under the 2011 General Plan as best-suited for rural residential. There is no justification for the proposal. I-368-11
7. Page 1-36: The EIR states that because fewer homes have been built per year than assumed in SANDAG's Regional Housing Needs Assessment, that more need to be built in the next 5 years. This is an unsubstantiated statement. The two documents must be analyzed together. Perhaps there have been fewer housing starts due to market conditions and/or population increases. See below. I-368-12
8. Page 2.12-8: The General Plan assumed about 99 homes to be constructed. If the issue is that there are not enough homes as stated in the EIR, that is likely a response to the market. Housing should first go where it is planned. Other developers make decisions based on the General Plan when purchasing land for development. I-368-13
9. Page 2.13-2: The EIR offers two options for Deer Springs Road. Option A includes necking down of the roadway from 4 lanes to 2 lanes. The traffic analysis needs to consider the impact of this merge and quantify the likely delays due to the constriction of the roadway. How bad will it be? I-368-14
10. Page 2.13-3: The EIR states the impact to Sycamore/Robelini/S. Santa Fe/Buena Creek road segment is significant and unavoidable. The impact is even greater than just traffic flow. This will impact emergency response times and impact the ability to evacuate the area. Full funding of the improvements should be guaranteed by developer and/or County. I-368-15
11. Table 2.13-41 and Table 2.13-42: Several road segments and intersections would be impacted and result in LOS F. This will impact emergency response times and impact the ability to evacuate the area. I-368-16
12. Page 4.16 (Alternative Analysis to 2011 General Plan): The General Plan Alternative is a much better alternative than the development proposal. There is no way to mitigate the movement of 10 million cubic yards of earth. Once graded, a site cannot be ungraded. Merriam Mountains is not well-suited for suburban-style-development. I-368-17
13. Page 4.17: The EIR states that aesthetically the proposed project would be less impactful than the General Plan land uses. This is not likely a factual statement. While one 53-acre site may be more intensely impacted under the General Plan scenario, the balance would be less impacted. Moving 10 million cubic yards of earth has a tremendous impact on the natural terrain. Single-lot development tends to minimize grading due to cost and consequently is much less impactful to the environment. I-368-18

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14. Page 4.18: The EIR states that wildlife corridor would be better with the proposed development compared to the General Plan land uses. There is no basis for this statement. I have yet to see a horned lizard in a suburban-style subdivision. I-368-19
15. Page 4.18: The EIR states that the General Plan land uses would have a greater impact to the gnatcatcher than the proposed project. There is no basis for this statement. I-368-20
16. Regarding the Water Assessment Report, the engineer should analyze the 1927.4 acres yielding no more than 100 residences (1 du/20 acres) for the General Plan alternative analysis. (Noting that the real comparison is to no water use on the site.) The assumption of 800 gallons per day (gpd)/acre for the 1985 acres is not reasonable and was based on very limited information. As a check, VWD notes that the average water use per single family home is 312 gpd. Applying that to 100 potential homes would yield 31,200 gpd, nowhere near the 1,500,000 gpd assumed in the EIR comparison analysis. This appears mostly to be an issue for the rural land use designation for the General Plan alternative. The factors for the Newland Sierra proposal are in line with the 312 gpd. The EIR should analyze the more reasonable 312 gpd rate for the General Plan analyses even if VWD assumed a future rate of 800 gpd/acre under the General Plan. (Again, noting that the real comparison should be to 0 gpd being used for the current site.) I-368-21

I also concur with the attached letter that is being circulated throughout our neighborhoods. In summary, I, too, believe that the Newland Sierra development proposal for Merriam Mountains is the "Wrong project, wrong time, wrong location." I-368-22

D. Snider  
3645 Camino de Las Lomas  
Vista, CA 92084

Attachment

### Newland Sierra DEIR

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August 4, 2017

Planning and Development Services  
Attn: Ashley Smith, Environmental Planner  
County of San Diego  
5510 Overland Avenue  
San Diego, CA 92123

**RE: NEWLAND SIERRA DRAFT EIR**

Dear Ms. Smith:

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

I-368-23

Wildlife Connectivity

- The project is proposed in a sensitive area; if developed, critical north/south and east/west **wildlife corridors would be severed.**
- Newland Sierra has sought special treatment, or a **“carve out” of the regional biological mitigation plan**, before the plan has even been adopted by the County and federal and state wildlife agencies.

I-368-24

I-368-25

Cultural Resources

- The project would impact significant cultural resources, particularly by expanding Deer Springs Road – including a site with **Native American human remains.**

I-368-26

Traffic

- Newland Sierra would generate **28,000 new trips per day** to our local roads.
- Newland Sierra brings **I-15 traffic to level of service “F”** since no new freeway lands and no new transit infrastructure is proposed.
- Newland Sierra proposes to widen Deer Springs Road to six lanes **and build a new I-15 interchange**, drawing thousands of cut-through commuters. Yet, Newland plans to start building before CALTRANS finishes its analysis and approval of a re-designed interchange at Deer Springs Road and I-15.

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I-368-28

I-368-29

Water

- The Vallecitos Water District projects a **water supply deficit for the next 20 years.**

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- The District's Water Supply Assessment **requires a 36% water supply cut** to existing customers to serve the Newland Sierra development.

I-368-31

### Fire

- Newland Sierra is proposed in a **"Very High Fire Hazard Severity Zone."**
- Newland Sierra does not provide **enough emergency access routes** in the event of a fire. Gridlock during an evacuation would compromise the safety of the entire region.

I-368-32

### Planning/Smart Growth

- The County Board of Supervisors spent millions of dollars and **10 years developing a General Plan** that protected, in fact downzoned, this area. A few years ago, the Board of Supervisors voted to approve the plan and protect this area from development.

I-368-33

### GHG

- The **County has not completed its Climate Action Plan**, therefore the County should not consider Newland Sierra until it's done.
- The Golden Door and Sierra Club recently won a trial court decision invalidating the County's threshold for measuring greenhouse gas "GHG" impacts.

I-368-34

I-368-35

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

I-368-36

Thank you for your consideration,

D. Snider  
3645 Camino de Las Lomas  
Vista, CA 92084

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