

O-11 Friends of Eden Valley

Comment Letter O-11



August 14, 2017

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Re: NEWLAND SIERRA, LOG NO. PDS2015-ER-15-08-001; SCH NO. 2015021036. PROJECT NUMBERS: PDS2015-GPA-15-001, PDS2015-SP-15-001, PDS2015-REZ-15-001, PDS2015-TM- 5597, PDSXXXX-HLP-XXX

Ms. Smith and County of San Diego DPLU Services Staff,

Thank you for giving Friend of Eden Valley an opportunity to comment on the EIR request for Newland Sierra. Eden Valley is part of a greater rural community comprised of Harmony Grove, Elfin Forest, and Coronado Hills. Our 501-C organization is in full support of development within the County's General Plan with existing zoning. It is the abuse of the GPA process we object to, as with this proposed development. Any project that contains large scale impacts which would remain as 'Significate and Unavoidable' are unacceptable and should be scaled down to an alternative project size.

O-11-1

**Project Description**

The existing project description is misleading. Described as "approximately 1,209 acres, or 61 percent of the project, would be dedicated as onsite open space and another 212 acres would be dedicated as offsite open space, for a total of approximately 1,421 acres of dedicated, permanent, and managed open space preserve (equivalent to 72 percent of the project acreage)." This EIR should differentiate between "buildable" space and "open" space as approximately 55 percent of the project contains Resource Protection Ordinance (RPO)-defined steep slope lands, as well as rock outcroppings that are visually prominent from the I-15 corridor. From this we can note that in actuality, only approximately 17 percent of the projects "buildable" acreage will actually be "open space", and all 2135 dwelling units will be crammed onto approximately 28 percent of the project acreage. We view this as clustering at its worst.

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Additionally, the EIR states "surrounding residential uses north, west, and south of the site include single-family and semi-rural residential development." There is no mention that most of the existing surrounding residential uses are on large lots and have the ability for large animal keeping. Please correct the project description to more accurately describe the project and surrounding area.

O-11-3

### Air Quality

This EIR seems to omit the existence of current residents whose properties adjoin or are within a ¼ mile of the project site. All will be affected by the air quality issues and should be studied. Although protective equipment will be issued to on-site workers to protect against Silica and other harmful air quality situations during grading and blasting, what measures will be in place for the existing residents, including any horses within the area? The Harmony Grove Village grading and blasting proved that the required dust control measures are NOT enough to protect the existing residents and horses. Evaluate potential impacts and identify mitigation to protect existing residents and horses.

O-11-4

### Noise

The EIR states that the Noise levels often will exceed the County Standards. While this would not be an ongoing impact, it will directly impact the surrounding communities for several years. Evaluation of the communities surrounding the proposed project which active large animal keeping including horses need to take place. Horses by nature are highly reactive to loud noises and ground vibrations. The required drilling and blast notifications should not only be expanded from 200 feet to at least 600 feet, but should request a daily blast e-alert go out to anyone who signs up (similar to what was done during the Harmony Grove Village project). There should be a County Inspector direct phone number provided within this e-alert notice so residents can report any issues during the construction and blasting for this project.

O-11-5

Horses are extremely perceptive animals allowing for quick detection and escape from predators in the wild. They are equipped with one of the fastest reaction times of any domestic animal, which likely results from evolving with "flight" as their main defense mechanism. The horse's range of hearing is far beyond that of a human ear. Given the many equestrian sites located near this proposed project (primarily in the South and SouthWest areas), measures must be taken to prevent any injury to horse or rider. We request a licensed Equine Vet to be onsite during all blasting to help mitigate any unforeseen situations created by the blasting for the horses in the area. A similar mitigation process took place with an onsite vet from Creekside Veterinary Services during the blasting for the Olivenhain Dam and Reservoir project at Lake Hodges. Analyze all potential impacts with regard to the existing horse population, and create a viable mitigation process similar to other projects mentioned here.

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### Traffic

Evaluate impact of construction traffic on Deer Springs Road, Twin Oaks Rd and Sycamore, with particular attention to the safety and welfare of large animals and horseback riders, given the number of both in the immediate vicinity and the existing trails along these routes.

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Analyze a feasible scenario in which all road segments on Deer Springs Road and Twin Oaks Road would be widened PRIOR to construction of any homes to help mitigate the effects of long-term construction traffic for the existing residents.

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Evaluate the traffic impact of the private equestrian property located at 630 Deer Springs Road. Any widening of the road must consider the ingress and egress of a long-bed dually truck hauling a 40-foot trailer with live animals. Any street widening scenarios which include a concrete center median are not practical at this location, as they would not be able to evacuate horses from the property.

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Per the Tentative Map Part 2, page 9 there is a private gated easement located off Deer Springs Road between parcels 182-040-36 and 182-040-49. Due to my lack of development map reading skills, please define exactly how this easement will be used and is there any potential scenario that it would be expanded to go further in any direction? If so, evaluate the potential impacts and identify mitigation for the existing properties that currently have the equivalent of a gated private driveway. Additionally, analyze the impacts of construction, utilities or any other non-resident traffic that might use this private easement regarding the show horse training that currently takes place at 630 Deer Springs Road, which requires a quite environment for these equine athletes to remain in top show condition. Many of these horses are World-Caliber show horses and any injury could jeopardize their show careers.

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#### Alternative Project

We support the EIR full evaluation of the following five of the nine alternatives to the proposed project, based on the projects density:

- 1) No Project (No Build) Alternative
- 2) Existing General Plan Alternative
- 3) CDFW/USFWS Land Planning Alternative A
- 4) CDFW Land Planning Alternative B
- 5) CDFW Land Planning Alternative C

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Best regards,

*Janean Huston*

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