

O-5.2 Twin Oaks Valley Community Sponsor Group Part II

Comment Letter O-5.2

July 31, 2017 Newland Sierra DEIR General Comments

Comments General

Comment 22: The isolated community garden #1, shown in Figure I-17, P14-Sierra Farms should be located closer to a development bubble or within one to make it more likely to be used by residents. Recommend moving it closer to the multi-family/ senior housing units so people in these units who may desire having a community garden are within walking distance to it.

O-5.2-1

Comment 23: In this same Figure #13 Composting Area for HOA Greenwaste is too close to private property on the West side of Sarver lane. Compost can create odor and a fire hazard by piling large amounts of green and brown (dry) material. Also, equipment used for grinding and mulching as well and moving piles of green waste can be loud. This development stands to generate a large amount of compostable materials. The DEIR didn't study the noise or smell that could be generated by this facility on nearby residents, especially the Zen Center that operates adjacent to the property. In addition, the DEIR didn't consider problems of seed dispersal from composting process that could introduce non-native seeds and plant material into the native vegetation. The DEIR should study moving the composting operation towards the center of the project, in the area between Hillside, Mesa and Knoll. It should also study noise associated with the activity and if it exceeds the County Noise Ordinance, create a landscaped or berm screen around a block wall or structure to shield residents from noise from the green waste activity. Monitor the green waste operation and control any problems of non-native landscape planning material in the compost from spreading into any open space areas. Allow the preserve manager to monitor the site to ensure non-native plants and seed do not spread into the open space.

O-5.2-2

Comment 24 : In the DEIR, The Summary of the Design Exception Requests dated June 2017 and prepared by Fuscoe engineering has several tables that are not readable. Please see pages: 10, 17,20, 21, 40, 41, 45 , 56, 57, 75 and 76. Please provide a readable pdf of these pages and recirculate the DEIR so the public can read and provide comments.

O-5.2-3

Comment 25: Figure 1-24 shows Electric Bike Stations as a Sustainability feature. What mechanisms will be used to make sure the electric bike sharing program has a positive outcome? Who will maintain them? Who will repair and replace them if they are misused or stolen from the community?

O-5.2-4

Comment 26: The DEIR notes that a Town Center is designed to provide shopping for convenience goods and personal services for day-to-day needs in the immediate neighborhood and surrounding community within an approximately 3-mile radius of the project. Neighborhood centers have on average, 10 to 15 smaller retailers and food establishments. The DEIR didn't look at similar Town Centers given the decline in brick and motor stores due to online shopping. For instance, the City of San Marcos is considering reducing the amount of retail space in the Creekside project because of falling retail shopping. The Town Center in San Elijo is also struggling since most residents prefer to shop at larger centers in Encinitas, Carlsbad and portions of San Marcos. Grocery stores, dental and medical services

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are still prospering because those services must be performed in a location. The DEIR needs to be more specific with what kind of retail or professional services will be provided and include in the DEIR a fallback plan if those facilities fail.

↑ O-5.2-5
Cont.

Comment 27: Commute/Travel Services for residents, PDF-2, PDF-3, PDF-4 reference bikes. Given the community is on a hill with steep terrane how likely is someone on a bike to Escondido and back up the hill? Electric bikes on recharging stations are proposed but no detail to if what range the electric bikes will have given the terrane. The DEIR needs to provide details on how the electrical bikes are likely to be used and list possible routes that fit the electrical range of the bikes.

↑ O-5.2-6

Comment Cumulative Impacts 28: I-55 through I-57 San Marcos Highlands does not appear to be shown as projects in table Projects not shown on Figure 1-46. Also not seen is various projects recently approved that are being built along Buena Creek Road such as Sugarbush/Tai Estates, Quintessa, and Lone Oak Ranch not to mention others in process such as Tomelson (sp?) Ask Tom to confirm project.

↑ O-5.2-7

Comments to Section 7, List of Mitigation Measures and Environmental Design Consideration (not including comments related to Biological)

Comment 29: 7-1, M-AQ-1

This mitigation measure calls for the County to notify SANDAG of the project and submitting and updated forecast to SANDAG. Considering this will shift population to an area the County and SANDAG had not anticipated having this population and hadn't planned for infrastructure to support it, this could create a need to shift development and infrastructure from another area of the County planned for growth to accommodate this project. The DEIR needs to study this impact and provide data that lets the public know how this will be addressed. Will the County need to downzone another area to accommodate this density for this project? How will it do so and where will the density need to be decreased to accommodate all additional infrastructure costs for this project?

↑ O-5.2-8

Comment 30: 7-8, PDF-3

Providing bicycle racks along main travel corridors, adjacent to commercial developments, at public parks and open spaces, and at retail and multi-family buildings within the project Site seems like a good idea but given the steep terrain are bikes a realistic alternative transportation form? The DEIR needs to provide evidence that this mitigation measure is realistic by studying the routes bikes would take within the project and compare to another project of similar terrane and use so that the public and decision makers know what percentage of trips will likely occur by bike, either electric or peddle, and not by car. What incentive mechanism will be used to encourage people to bike to the store from inside the project and bike back (likely up a steep hill) to take purchases home? What other project with the same terrane and conditions as this one has been implemented and how successful has it been?

↑ O-5.2-9

Comment 32: 7-10, PDF-25

How will the project ensure that "turf in rear or side yards of single-family homes shall be warm-season

↓ O-5.2-10

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turf or shall have a plant species factor of 0.6 or lower”? What methods will be used to ensure residents don’t plant high water use plants in these areas?

↑ O-5.2-10
Cont.

Comment 33: 7-10, PDF-28

The green waste facility location is very problematic. It is located too close to existing Zen Meditation Center and stands to impact the Open Space.

↑ O-5.2-11

Comment 34: The DEIR does not address possible noise from truck traffic, grinding, etc. to the adjacent/nearby Zen Center. The DEIR needs to include a mitigation measure listing specified operating hours.

In addition it should include sound attenuation added to reduce noise impacts to the Zen Center. By having the operation inside an enclosed building it would be easier to control noise, smell and non-native plant material. Sound baffles could be added so that noise from the composting operation doesn’t enter the open space or the nearby Zen Meditation Center.

↑ O-5.2-12

As an option we recommend moving the composting facility closer to the center of the project, between the Valley and Knoll development bubbles to reduce impacts to existing residents as well as reduce the amount of travel from where the material is collected to the composting facility. Having the facility closer to the project would help reduce greenhouse emissions created by the project. Better yet, offer smaller in ground composters centrally located throughout the project so residents and landscapers maintaining the common areas can deposit and collect compost with little or no vehicle traffic required. Smaller composters should be built into each residence to capture food waste.

Comment 35: 7-10, PDF-31

The DEIR needs to explain what would be considered equivalent to Energy Star rated appliance in the statement, “Builders would offer residents their choice of energy-efficient appliances (including washer/dryers, refrigerators), and appliances (including dishwashers) installed by builders would be Energy Star rated or equivalent”. What is an example of an equivalent rating to the Energy Star?

↑ O-5.2-13

Comment 36: 7-44 through 7-45, 7.6.2: Project Design Features

Mitigation measures PDF-5, -6, -7, -8, -10, -13, -15, 16, -18, -19, are all measures that start with the words “Coordinate” and “Promote” but there is no detail how this will be done, how it will be monitored to make sure it works, or who will actually do all the Promoting and Coordinating. So that the public and decision makers know that these mitigation measures will actually work, the DEIR needs to provide more detail. The DEIR should also provide some evidence that these measures have worked before by citing examples.

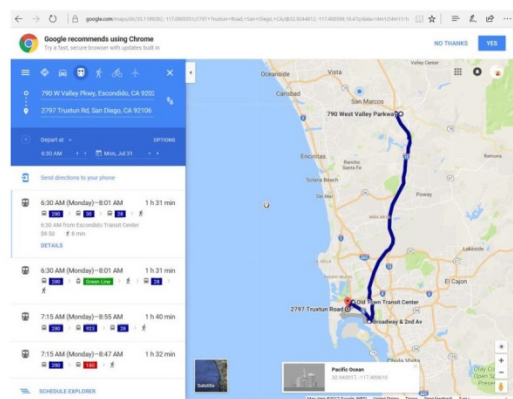
↑ O-5.2-14

Comment 37: PDF-17

The DEIR didn’t analyze where residents of the proposed project are likely to work or how the shuttle would be used. Who will implement the “...demand-responsive shuttle service that provides access throughout the project Site, to the park-and-ride lots, and to the Escondido Transit Center”? Will it pick residents up at their homes or stop at various park-n-rides near the project? How many residents are

↑ O-5.2-15

anticipated to use it and based upon existing community pattern in the area of similar development, how far are residents of the proposed project likely to travel once they reach the Escondido Transit Station? We are concerned this method won't be used by residents of the Newland Sierra project. The DEIR should look at other similar projects along the I-15 that take residents to the Escondido Transit Center to get an idea of ridership so the public and decision makers know how many people will likely use the shuttle. Currently a trip from the Escondido Bus Station to the depot downtown takes about 1 hour bus travel time. Riders will need to add another 20-25 minutes to account for time to park their car at the park-in-ride, a couple of minutes to wait at the platform for the shuttle to arrive, the shuttle ride in horrid traffic on the I-15 as it approaches SR78, time needed for the shuttle to drop off people at the Transit Station, and about five minute window before the bus is scheduled to leave. When you add it all up the average commuter using the "demand-responsive" shuttle should allow 30 minutes on top of the hour's trip if the commuters are heading downtown, the largest job center. Of course, if they work beyond the station downtown then they must add a trolley trip or another buss and some walking. If someone who would live in the Newland Sierra project worked for the Navy or a defense contractor they may need to commute to a job off of Rosecrans and need to allow 1 hour 45 minutes on top of the 30 minute commute to get to the Escondido Transit Center for a total commute of 2 hours 15 minutes or 4 ½ hours per day commuting time.



I personally [Sandra Farrell] drive this distance of 84 miles round trip averaging 2-2 ½ hours each day. In ten years of public commuting I have found it usually takes twice as long as to use public transportation as to drive. This observation is based on about eight years of time I spent riding the Coaster/Trolley to work in Mission Valley and the Metrolink to work in Irvine. Unless there is an incentive, most people who have means to buy the homes in the Newland Sierra development will likely not use public transportation.

Comments to 2.12.3.1 Inducing Substantial Population Growth.

O-5.2-15
Cont.

O-5.2-16

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Comment 38: The Newland Sierra project stands to have significant impacts on the population and community Character of an existing community that was not addressed in the DEIR. Although the Twin Oaks Valley Planning Area is within the North County Metro area, the Twin Oaks community is a rural community, very different from many of the other more urban areas found within North County Metro. The DEIR tried to compare the Newland Sierra project to the whole County and to North County Metro when it considered population growth and didn't consider the impacts of the project to population within the Twin Oaks Valley Community Planning Area.

The Twin Oaks community is isolated from more urban areas in North County Metro due to limited access, multiple seasonal creeks and steep terrain. The County's density per the existing General Plan accounted for these constraints as well as the character of this rural Twin Oaks community.

Comparing the 2005 County's Current and Future Residential Density map that was prepared during the General Planning process, it is easy to see the historic and planned development for the Twin Oaks community is far less dense than areas such as Lake San Marcos in the south or along the Sprinter line that runs along South Santa Fe. Although this map is old, not much development has occurred in the Twin Oaks community since 2005 so the numbers are likely close to what is found today. The DEIR should have presented an updated Current and Future Residential Density map so the public and decision makers could see how the density and population of the proposed Newland Sierra project compares to the existing and planned density, under the current General Plan, for the Twin Oaks area. This would allow the public and decision makers to understand the social and community character impacts of having the Newland Sierra project, a community vastly different from the rural Twin Oaks community, add far more people than currently in Twin Oaks community or planned for in the future.

Using the 2006 County's Current and Future Residential Density map (see figure: Current and Future Residential Density) counted the existing and future dwelling units within the Twin Oaks Planning boundary area (shown on the map and highlighted in green). Each dot represents ten dwellings so there are approximately 780 existing dwellings and 530 future dwellings, or a total of 1,310 dwellings shown within the Twin Oaks Valley Community Planning Area. The Newland Sierra project will add an additional 2,135 dwellings which will raise the total future dwellings from 1,320 to 3,445 dwelling units. The US Census, 2011-2015, shows on average 2.8 people per household which is slightly less than what the project figures, 2.84 people per household listed on page 4-69 of the DEIR. (see figure: Current and Future Residential Density)

The Newland Sierra project could add another 6,063 to 6,106 people to the community or increase the future planned population of Twin Oaks from 3,747 people to 9,810 or 9,843,. This would be far more than population originally planned for the area and likely be growth inducing. In addition, because the proposed project is far more urban than the existing Twin Oaks area and will add so many people the project could change the community character of Twin Oaks. Finally, we are concerned residents of the proposed Newland Sierra project may not feel they are part of the Twin Oaks community but instead feel part of either Escondido or San Marcos. This would likely create a community so large that it feels no connection to the community it is actually in is a problem, a potentially significant impact the DEIR didn't address. We don't believe the County adequately planned for this type of growth in this highly

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Cont.

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constrained area. More importantly, the infrastructure planned to accommodate the growth shown in the existing County General plan isn't planned or budgeted to accommodate this project. More importantly, since development fees, gas taxes, and other taxes need to pay for infrastructure have to be either raised or diverted from other areas, the DEIR should have studied what the additional costs would be or if the County would need to divert infrastructure resources from other areas to accommodate this project.

O-5.2-16
Cont.

Twin Oaks Valley Community Sponsor Group |sfarrell

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Newland Sierra DEIR Comments related to Biological Impacts

Comments- Biological

Comment 1: Figure I-3 of the Parks and Trails Plan shows 8 ft and 3ft. wide multi-use trail through the open space. Human and especially the scent of dogs prevents the trail area from providing habitat for some predators such as the bobcat. Bobcats will not raise young in an area frequented by dogs. The DEIR did not address how human interference of this kind would be mitigated.

O-5.2-17

Comment 2: Small and Large dog parks shown on P11, Figure I-4, P11-Peak's Park is too close to the open space that will be used by wildlife. In addition to dogs having a negative impact on some wildlife, wildlife such as larger predators can be tempted by smaller dogs running off leash in dog parks. What is the fencing used around the dog parks and if there is fencing, how high is it? Is it sufficient to prevent coyotes, bob cats or mountain lions from being able to enter the dog park or for dogs to enter into the open space to chase wildlife?

O-5.2-18

Comment 3: Recommend swapping #10 and #11, the dog parks, with location of #5 Pool, spa, Patio. Dog parks should be kept more towards the interior of the development.

The development design of Mesa and Hillside constrains wildlife movement from traveling from the northern end of the site to open space areas along Deer Springs Road. Recommend wildlife undercrossing at Mesa Rock Road to allow movement of wildlife just north of the Terraces to open space area between Mesa Rock Road and Sarver Lane. Recommend removal of portion of development bubble in the Hillside and possibly Mesa areas to create 1000 foot wildlife corridor.

O-5.2-19

Comment 4: Muhlenbergia rigens (Deer Grass) is shown in Figure 1-20, Basins and Swales. This is named appropriately because it attracts deer that eat it. It should not be planted near roads where deer may need to cross a road to get to it. When Twin Oaks Valley Road was extended south to San Elijo the center median was planted with deer grass. After several vehicular accidents and deer deaths the City decided to change the planting. We did not see in the DEIR where there is a planting plan for areas adjacent to roadways. Please provide a planting plan and note location of deer grass.

O-5.2-20

Comment 5: The isolated community garden #1, shown in Figure I-17, P14-Sierra Farms should be located closer to a development bubble or within one to make it more likely to be used by residents. Recommend moving it closer to the multi-family/ senior housing units so people in these units who may desire having a community garden are within walking distance to it.

O-5.2-21

Comment 6: In this same Figure #13 Composting Area for HOA Greenwaste is too close to private property on the West side of Sarver lane. Compost can create odor and a fire hazard by piling large amounts of green and brown (dry) material. Also, equipment used for grinding and mulching as well and moving piles of green waste can be loud. This development stands to generate a large amount of compostable materials. The DEIR didn't study the noise or smell that could be generated by this facility on nearby residents, especially the Zen Center that operates adjacent to the property. In addition, the DEIR didn't consider problems of seed dispersal from composting process that could introduce non-native seeds and plant material into the native vegetation. The DEIR should study moving the composting operation towards the center of the project, in the area between Hillside, Mesa and Knoll. It

O-5.2-22

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should also study noise associated with the activity and if it exceeds the County Noise Ordinance, create a landscaped or berm screen around a block wall or structure to shield residents from noise from the green waste activity. Monitor the green waste operation and control any problems of non-native landscape planning material in the compost from spreading into any open space areas. Allow the preserve manager to monitor the site to ensure non-native plants and seed do not spread into the open space.

O-5.2-22
Cont.

Comment 7: In Figure 1-2a, Biological Open Space, and Figure 1-2b, Biological Open Space Regional Context, the DEIR notes the project would dedicate and permanently preserve approximately 1,209 acres of on-site open space, and an additional 212 acres of off-site open space for a total preserve acreage of 1,421 acres. This is equal to 72 % of the project site acreage.

We would like to know why the percentage isn't 75% per what the 2000 NCMSCP noted would be conserved in PAMA areas or shown on the County website for the County Conservation Subdivision Plan? In addition, why didn't the DEIR consider acquiring coastal sage scrub habitat adjacent or nearby this site and a like for like conservation of habitat type?

In the NOP Response to Comments the California Department of Fish and Wildlife (CDWF) page E-4 of E9, (incorporated by reference) it states, *"Based on our past meetings with the County, the Department has provided the following tenets that will guide any hardlined agreement negotiations for the Project: d) The project should achieve a 25 percent development and 75 percent preservation ratio on-site to the maximum extent practicable; initial proposals only showed an approximate 60:40 ratio. For any portion of the 75 percent conservation that cannot be achieved on-site, the balance should be met by contributing land that adds value to the Merriam Mountains connection, preferably in the same NC-MSCP planning unit. Additional off-site conservation, if part of the proposal, should emphasize additional conservation of coastal sage scrub habitat."*

O-5.2-23

Why isn't a 75% onsite conservation considered? Why is off-site conservation Ramona grasslands and not Coastal Sage Scrub?

Also, this letter says, *e) The north-south habitat connectivity along I-15 is important for the NC Plan; f) Internal open space (e.g., block 3) is not acceptable for preservation credit;...*

Regarding tenet e), We don't see that there is habitat connectivity along the I-15 because the location of the Terraces and the Town Center. In addition, for tenet f) the open space north formed by the Valley development bubble and the Knoll as well as the open space between the Hillside and Valley is long fingers of open space that fragments wildlife and may actually become a mortality sink for larger species. Were these areas allowed to be counted as Biological Preserve area because they were not enclosed islands but peninsulas?

Finally, since this letter is incorporated by reference, what recommendations and tenets was the project not able to follow and why?

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Comment 8: Although the project references the 2009 North County MSCP that document is no longer available to the public. In addition, there were many problems revealed in comments submitted by the Wildlife Agencies and other groups during the review of the 2009 plan. How does the proposed project address those concerns, especially those identified by the Wildlife Agencies?

O-5.2-24

Although the DEIR state, *"The proposed project may also obtain take authorization through Section 7 consultation with the USFWS."* The prevue of the Army Corps has changed and Section 7 is limited to wetland impacts. It can't be used to throw a wide net and use a Jeopardy/No Jeopardy Opinion to avoid Section 10 requirements.

O-5.2-25

Comment Biological Mitigation Measures:

Comment 10: 7-15, M-Bio-4

in the last few years the Jepson Manual, a key reference manual for California plant species names was updated in 2012 to provide more accurate species information. Some plant species names have changed. For instance Deerweed (*Lotus scoparius* var. *scoparius*), a native shrubby perennial found throughout area and adjacent coastal sage scrub has been renamed and the new scientific trinomial is *Acmispon glaber* var. *glaber*. This change of names can be confusing and could result in a non-native or naturalized species being included in the plant palette near the biological open space. In addition to the project Biologist, who may or may not be a plant species expert, a plant species expert from the Wildlife Agencies should be consulted on all plant pallets.

O-5.2-26

Comment 11: 7-15, M-Bio-5, #2, It should read, 2. Remove *"of"* and add *"prior to"* to this sentence, *"Conduct preconstruction nesting bird surveys within 72 hours prior to of construction-related activities and implement appropriate avoidance measures for identified nesting birds"*.

O-5.2-27

Comment 12: 7-18, M-Bio-6, Revegetation Plan,

In the third sentence down, regarding the *"appropriate see/source materials"*, for revegetation, the mitigation should include that the seed sources of existing on-site native plants should be collected from the site in advance of clearing to ensure genetic integrity and not introduce a species of different genetic material into the biological open spaces areas.

O-5.2-28

Comment 13: 7-18, M-Bio-6, Revegetation Plan,

We have a concern about the **Monitoring** section under the **REVEGETATION PLAN**. It states, *"The PDS Landscape Architect shall review the revegetation plan for conformance with this condition and the County's Report Format and Content Requirements for Revegetation Plans. Upon approval of the revegetation plan, a Director's Decision of approval shall be issued to the applicant, with the request for compliance with a Secured Agreement for implementation of the revegetation plan. Upon receipt of the compliance letter, the PDS Landscape Architect shall sign the Agreement for the Director of PDS and ensure that the cash deposit is collected."*

O-5.2-29

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It appears the Landscape Architect and the Planning Director, neither of whom seem to qualify as revegetation monitoring experts, to decide if the applicant is compliant with revegetation and sign off on revegetation work. Is this correct? Shouldn't someone who is an expert in native plant revegetation be responsible for these tasks?

O-5.2-29
Cont.

Comment 14: 7-21, top of page, first paragraph,

We did not see the "Memorandum of Understanding dated February 1997 between the Wildlife Agencies and the fire districts or any subsequent amendments..." in the DEIR. Please provide these for public review.

O-5.2-30

In the paragraph about **Monitoring**, I believe PDS means Planning and Development Services what does LDR and PCC mean?

Comment 14: 7-21, M-BIO-8C, Limited Building Zone Easement: This mitigation measure states, "Limited Building Zone Easement shall be granted to prohibit the building of structures that would require vegetation clearing within the protected biological open space for fuel management purposes. The easement must extend at least 100 feet from the Biological Open Space boundary."

We weren't clear what this actually means. Does this mean that there is an easement of 100 feet from the edge of the Biological Open Space boundary and no building structures that would require clearing could be built in that 100 feet? Is this easement in Fuel Modification Zone 2 that is shown on Figure 2.2-4, Active Agriculture? The fuel modification zone is much larger than 100 feet. Does the paragraph regarding the Limited Building Zone Easement mean you can build in the first 100 feet of a fuel modification area that is 200 feet wide? Under the DESCRIPTION OF EQUIPEMENT: IT STATES, "The only exceptions to this prohibition are Structures that do not require fuel modification/vegetation management." What Structures would be allowed?

O-5.2-31

Comment 15: 7-25, M-BIO-9

Under Monitoring it states, The Department of Planning & Development Services shall review the Horkelia Mitigation Plan for conformance with this condition and the applicable elements of the most current version of the County of San Diego Report Format and Content Requirements for Revegetation Plans". Since the North County MSCP has not been approved shouldn't the US Fish and Wildlife Service and Department of Fish and Wildlife approve the Horkelia Mitigation Plan for conformance as well as County staff?

O-5.2-32

Comment 16: 7-26, M-BIO-13,

In this mitigation measure it states, "Caltrans can and should prepare, or cause to be prepared, a biological resources study to evaluate these potential impacts. Remaining potentially significant biological impacts of the interchange improvements require further detail as to the Caltrans-selected "build" project or alternative, along with its size, configuration, and disturbance zones". Is sounds like the public/taxpayers are paying for this measure and associated costs and not the project. Since the Newland Sierra project triggers the need for this mitigation, the DEIR needs to make clear to the public and decision the anticipated costs for Caltrans to do this work. The preparers of the DEIR should ask

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Caltrans to provide an estimate and include it in this section of the DEIR. I'm sure they have some good estimates based on the past work they have done.

Comment 17: 7-7, M-AQ-17:

This mitigation measure states, *"The tiered vegetation shall be maintained by the property management company for the homeowner's association (HOA) as part of the residential Community landscaping areas where feasible."* Please explain that would make it infeasible for the HOA to not maintain via a property management company the tiered vegetation? Because of problems associated with seed dispersal of non-native vegetation from private yards into the open space, what measures will be used by the HOA or others to ensure non-native vegetation does not enter the open space areas? The DEIR needs to address this as part of M-AQ-17, clarify how the mitigation will be enforced, who will be doing it, and identify recourse should the responsible party fail to carry out the mitigation measures.

Comment 18: What Low Impact Development Standards for storm water runoff will be used to make the Newland Sierra project compliant with current storm water regulations that want to see developed areas runoff returned to pre-development conditions?

Comments to Alternatives Analysis as it relates to Biological

Comment 19: 4.5.1 Existing General Plan Alternative

It states under this alternative that it was developed in compliance with the County's Conservation Subdivision Ordinance and other existing development requirements and constraints that apply to the project Site. However, comparing it to what is presented on the County's website, it doesn't seem to use the County's Conservation Subdivision Plan, (CSP). Please reference this page:

<http://www.sandiegocounty.gov/content/sdc/pds/advance/conservationsubdivision.html>

On the County's website the RL-20 designation has a minimum percent avoided resource amount of 80 percent. This would indicate that 20 % of the land is developable. Therefore, under the CSP, 381.4 acres of 1,907 acres would be developed. Also, 19.6 acres of Semi-rural SR-10 would require a 75 percent minimum avoided resources leaving, 25% is developable or 4.9 acres. A total of 386.3 acres appears to be the maximum considered for development under the CSP. This would be less than the 777 acres proposed to be "disturbed" under the existing project or any of the alternatives (with the exception of the No Project Alternative) shown in the DEIR.

The County's website lists incentives to encourage conservation. It states, *"Minimum lot size in zoning has been decoupled from the density regulations in the General Plan; meaning that a minimum lot size in zoning does not dictate the number of permitted*

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O-5.2-34

O-5.2-35

O-5.2-36

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dwelling. Rather the General Plan land use designation identifies the maximum number of permitted dwelling units allowed."

Using smaller lot sizes and clustering would allow for 99 homes to be built on 386.3 acres and leave at least 1,520.7 acres as open space on site. This would be more open space than the proposed project preserves. The proposed project preserves a total of 1,421 acres of open space --1,209 acres on site and 212 acres off site. Therefore a County alternative using the existing General Plan along with the Conservation Subdivision Plan or CS P could have significantly less impacts than what is proposed. Why didn't the DEIR study an alternative using the CSP and clustering the 99 homes?

O-5.2-36
Cont.

Comment 20: 4.11.1 CDFW Land Planning Alternative B Page 4-76

We are curious about some of the statements made in Alternative B. How was the conclusion reached in the DEIR that this alternative would result in a disjointed community that would no longer support the connectivity as planned under the proposed project? If this alternative was implemented wouldn't the connectivity be that community is jointed by the other existing roads that would run through the project? Wouldn't the commercial areas be just as accessible since most residents will be passing the commercial areas of the project to reach I-15? Who decided when the DEIR was written what is and what is not disjointed? What criteria were used to arrive at this opinion?

O-5.2-37

For this alternative the DEIR says that, *"Residents in the western portion of the project would no longer have direct access to the commercial or school uses in the Town Center"*. Couldn't residents simply drive a short distance in either direction and use major shopping centers in either Escondido or San Marcos? Since there is no middle and high schools are planned to be built within the project, won't parents be taking kids to San Marcos or Escondido schools anyway?

Comment 21: All the CDFW alternatives create a solution where wildlife can access PAMA lands to the south by shifting eliminating the project bubbles on the eastern portion of the site. We would like to propose an alternative be studied that uses the County GP along with the Conservation Subdivision Plan, and either move the homes to the west or creates a large wildlife under crossing under the main road on the east side of the project . Improvements to Deer Springs Road should also include either a wildlife

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undercrossing or overcrossing so that wildlife can safely move from the project to PAMA lands in the south.

Comment 22: Comments to Figure 2.4-8 Wildlife Connectivity:

Corridor B runs across the main road that serves most of the development. No wildlife undercrossing appears to be shown in the grading plan. In addition to concerns of wildlife fatalities due to cars as wildlife try to cross the road, we are concerned wildlife won't be able to use Corridor B. Looking at the grading plans there is significant grading creating steep cuts into the existing landforms. Only a proposed public drainage easement appears to cross the road where the slope is gentle. We are concerned the slopes caused by the grading at this location will be too steep for most wildlife. There are no cross sections showing conditions at Corridor B so there is no way to tell it will be too steep for wildlife to use. The DEIR needs to provide more detail to demonstrate there is an adequate corridor width that is functional for wildlife to use and if there isn't, specify which wildlife species likely won't use Corridor B due to the project modifying the terrain at this location. ([See Figure: Comment to Wildlife Connectivity](#))

↑ O-5.2-38
| Cont.

O-5.2-39

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