

### I-258 Ellen Maisen

- I -258-1** The commenter asks how the project could be part of the Specific Plan for the County, when it did not exist at the time the plan for the area was created.

The Newland Sierra Specific Plan (Specific Plan) outlines the land use, circulation, energy, water, and transportation strategies; the open space and conservation strategy; the infrastructure and public facilities strategy; the development standards and design guidelines; and the implementation program necessary to achieve the orderly and compatible, environmentally sustainable development and long-term native habitat conservation associated with the proposed Newland Sierra Project. Therefore, the Specific Plan was drafted as part of the project.

- I -258-2** The commenter asks how the project can be carbon neutral when it does not include a transportation system for the residents and visitors.

The proposed project does include 32 Project Design Features which would be implemented within the proposed community that would reduce GHG emissions. Of the 32 PDFs, 20 are part of a Transportation Demand Management (TDM) Program which is designed to reduce GHG emissions associated with vehicle trips. The Newland Sierra TDM Program technical memorandum, and specifically “Table 2: TDM Program Performance Metrics and Targets” therein (see Appendix D of Draft EIR Appendix K), identifies the specific performance measures that the project is committing to that would equate to the calculated TDM effectiveness percentages. The transportation coordinator (whose role/responsibilities is described on page 6 of the Newland Sierra TDM Program technical memorandum) is responsible for managing/monitoring the TDM program to ensure compliance with Table 2.

Table 2.7-7 calculates the VMT reduction for the TDM Program based on CAPCOA Guidance. Table 2.7-7 has been revised to include the emissions reductions credited to PDF-22 for the installation of solar PV panels on all single-family and multi-family units.

Table 2.7-8, Estimated Proposed Project Emissions with GHG Reduction Features (2021) calculates the total, remaining GHG emissions to be mitigated through purchase and retirement of offset credits. Tables 2.7-9 through 2.7-14 calculates the proposed project emissions associated with various land uses on a per unit/acre basis. These are the amount of emissions which are required to be offset through the retirement of carbon offsets credits. Per M-GHG-2, prior to issuance of a Site Plan for any of these uses, proof of retirement of carbon offset credits in the appropriate amount is required.

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Moreover, the MMRP as adopted in conjunction with approval of the proposed Project will be in place through all phases of the proposed Project and will ensure the TDM Program is successfully implemented. Through the MMRP, the County will be responsible for ensuring implementation of PDFs (which incorporate each of the TDM reduction strategies), Project commitments, and mitigation measures (including Mitigation Measure M-GHG-3, which requires the applicant implement the PDFs which encompass the TDM Program in EIR) through monitoring and periodic reporting. Deficiencies, if any, can thereby be promptly addressed and corrected through notifying the appropriate parties of any non-compliance and ensuring problems are corrected.

- I -258-3** The commenter asks how the project reinforces the character of existing communities.

The comment addresses land use issues which received extensive analysis in the Draft EIR, specifically in Section 3.3 Land Use and Planning. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -258-4** The commenter provides an excerpt from the Newland website, which describes the project. The comment states that the project is in disregard for the community and the EIR proves it to be false.

The County notes the comment; however, it does not raise an environmental issue within the meaning of CEQA. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.

- I -258-5** The comment states that the project is not consistent with the General Plan. The comment explains that the project should not be considered Smart Growth.

Please refer to **Topical Response LU-1**.

- I -258-6** The comment states that building thousands of residences on land next to a freeway does not provide transportation infrastructure.

The County notes the comment; however, it does not raise an environmental issue within the meaning of CEQA. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final

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decision on the project. No further response is required because the comment does not raise an environmental issue.

- I -258-7** The comment states that if there is no other way to leave the project area there could be potential risk, because the project is located in a “high fire risk area.”

For information regarding evacuation during a wildfire, refer to Draft EIR Appendix N-2, which includes the Evacuation Plan for Newland Sierra. Also refer to **Topical Response HAZ-1**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- I -258-8** The comment states that having no transit available forces residents to drive, which results in additional traffic gridlock. The comment states that increasing density in a city center where rapid transit is available makes sense, but building in a rural area does not.

The County notes the comment; however, it does not raise an environmental issue within the meaning of CEQA. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required because the comment does not raise an environmental issue.

- I -258-9** The comment states that there is a limited amount of water available and adding more residential to the area would stretch the supply.

Please refer to **Topical Response UTL-1**. The comment addresses utilities and service systems, which received extensive analysis in the Draft EIR, specifically in Section 2.14 Utilities and Service Systems. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -258-10** The commenter explains that she is a small organic farmer in Valley Center and looks to the project with dismay, because she has no representation. The comment states that the County planners should take the quality of life of residents into account. The commenter explains that whether she is able to conduct her business in the area is dependent on the good management of others at the County level in the next few years. The commenter provides background about her business and explains that she invested her savings into her business, believing that the General Plan would be a guideline for development in the area.

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The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- I -258-11** The commenter explains that she cannot trust the County to keep its word about development and changes to the area, which will impact her daily business and life. The commenter explains that this is the third major project of its type, but there may be others she is not aware of. The comment states that the project is not consistent with the General Plan and will make the daily life of residents and business owners much more difficult and dangerous in emergency situations.

Please refer to **Topical Response Land Use and Planning - General Plan Consistency**.

- I -258-12** The commenter explains that she has been keeping records of traffic and there are slow downs and traffic flow alerts from the Twin Oaks area to Temecula. The commenter explains that she cannot travel north of her property from 2 PM to 6 PM to deliver produce or shop for supplies. The comment states that the project would make this condition worse, especially with the widening of Deer Springs Road. The commenter explains that the new Palomar College satellite campus and new planned residential developments on the corner of I-15 and SR-76, would also increase traffic on the I-15 and feeder roads.

The comment addresses traffic, which received extensive analysis in the Draft EIR, specifically in Section 2.13 Transportation and Traffic. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -258-13** The comment states that an August 6, 2006 Board of Supervisors report states that “there is enough capacity on Gopher Canyon Road to accommodate excess flow.” The commenter states that this statement is incorrect because traffic conditions on Gopher Canyon Road are difficult and the roadway is curved which creates dangerous conditions.

The comment addresses traffic, which received extensive analysis in the Draft EIR, specifically in Section 2.13 Transportation and Traffic. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

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**I -258-14** The comment states that the County and Caltrans should be ashamed to allow this project to develop when there is no evacuation plan for residents. The comment states that the County drafted a document that states that the project would improve fire safety in the area. The commenter asks how building inadequate roads for evacuation, adding more residential to the area, not providing adequate funds for fire protection, and not providing a General Plan for an evacuation would be adequate to handle an evacuation in the area.

For information regarding evacuation during a wildfire, refer to Draft EIR Appendix N-2, which includes the Evacuation Plan for Newland Sierra. Also refer to **Topical Response HAZ-1**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

**I -258-15** The comment states “that same document” claims the project would help the County meet its housing needs. The commenter explains that this is not accurate because this is not an area in the County where housing is needed and housing is needed in more urban areas. The comment states that people who move to unincorporated areas tend to do so for the rural nature of the area and if all of these areas were developed there would be no space for agriculture. The comment states that a responsible approach to siting population is needed. The comment states that there are no shopping facilities, schools, fire stations, sewer connections, transit hubs, or electricity generation in the area.

As stated in Section 1.0 Project Description on page 1-20, build out of the Community is anticipated to occur in two phases over approximately 10 years in response to market demands and in accordance with a logical and orderly expansion of roadways, public utilities, and infrastructure. Figure 1-32, Phasing Plan, illustrates the anticipated sequence of planning area development, although sub-areas may not develop in that order. Backbone infrastructure and roadway improvements would be constructed in phases, as needed, to ensure that improvements are in place at the time of need.

**I -258-16** The commenter explains that the “same report” states that the biological core area cannot be moved or mitigated, but later learned that there would be mitigation and “trading” of parcels in Ramona for those damaged by the Newland Sierra project. The comment explains that this is a contradiction to the EIR and it is disheartened that the County would trade a biological resource for another, which is not allowed as claimed in the EIR.

The commenter explains that they are not familiar with the wildlife in Ramona, but states that there are bobcats in the project area, which indicates that there is significant habitat resources for medium sized predators. The commenter explains

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that the population of bobcats and predators she has witnessed in the area have decreased, and populations of smaller animals have increased. The comment explains that there will be no room for the small mammals, birds, and insects in the area after the development of the project.

The comment states that the EIR acknowledges that there would be significant impacts to various species and that this is unacceptable. The comment states that the RPO should not be amended to allow for significant impacts if the project is in a Resource Conservation Area. The comment states that a wildlife monitor would not mitigate the significant impact. The comment states that the EIR does not mention the species she has listed (i.e., hawks, vultures, snakes, bobcats, and owls).

Potential impacts to biological resources, including wildlife, received extensive analysis in the Draft EIR, specifically in Section 2.4 Biological Resources. The County acknowledges the comment and refers the reader to **Topical Response BIO-1** regarding the proposed project's consistency with the Draft NC MSCP. As described in the Newland Sierra Off-Site Mitigation Memorandum (Appendix K to Appendix H of the Draft EIR), the mitigation site is comparable to or better than the habitat that is being impacted on the Newland Sierra site. The mitigation site includes a variety of topographic relief, a comparable suite of vegetation communities, and rock resources. Therefore, it contributes to the vegetation community mitigation requirements described in Table 2.4-27, pgs. 2.4-172 and 2.4-173 of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

**I -258-17** The commenter explains that rock crushing and blasting activities would pose health risks to communities in the area surrounding the project site and would not be in compliance with the Clean Air Act and other legal requirements for industrial activity. The comment states that these activities would also result in significant soil and water contamination, as stated in page 7608 of the EIR. The comment states that the project, in this sense, would not be consistent with the General Plan. The comment states that the EIR does not provide a blasting schedule or plans for widening and changing the intersection at Deer Springs Road.

The comment states that increased traffic and idling automobiles would result in localized pollution impacts and health risks, especially because of the terrain in the area.

The Draft EIR's Air Quality chapter, and particularly Section 2.3.5, Impact Analysis therein, comprehensively evaluates the project's construction-related air quality

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impacts, including those attributable to blasting as well as operational impacts. Please refer to **Topical Response AQ-1**.

Please refer to **Topical Response AQ-2**. The comment addresses general subject areas, which received extensive analysis in the Draft EIR, specifically in Section 2.3, Air Quality. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -258-18** The commenter explains that the project would be split between two school districts and there are no plans for new schools. The comment states that this would be a burden to local school districts and could result in overcrowding, which would harm students and require additional funding.

The County disagrees with this comment. As stated in Section 3.5 Public Services on page 3.5-17, the project has reserved a 6-acre site for a school. After the on-site school is built, K-8 students generated by the proposed project would have the opportunity to attend this new school, which would have adequate capacity and would provide relief to overcrowding in the San Marcos Unified School District. Even with the addition of a school on-site, the project would be subject to assessment of applicable school fees in all three districts at the appropriate rate. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

- I -258-19** The commenter explains the fire risk in her property and explains how her grove was specifically at risk during a recent fire. The commenter asks why the project developer would not be responsible for paying for fire protection resources. The commenter explains that the project is in a serious fire hazard zone and there is no plan as to how the project would receive fire protection. The comment explains the fire risks in the area and states the \$1-2 million fire protection fee is not enough to cover the costs of fire stations needed to accommodate the project. The commenter explains that climate change would increase the number of wildfires over time. The comment states that rural areas would not pose as much of a wildfire risk as compared to a residential development.

As stated on page 3.5-15 of the Draft EIR:

The proposed project will pre-pay the County Fire Mitigation Fee pursuant to a Fire Fee Payment Agreement with the DSFPD which would also provide funding beyond the required County Fire Mitigation Fee to augment the DSFPD's capabilities for continued provision of timely service to its primary

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jurisdictional area, including the project Site. By pre-paying the County Fire Mitigation Fee, the proposed project ensures Fire Station 12 would continue to have the capacity and facilities to serve the project Site and satisfy the General Plan's 5-minute threshold (Appendix N). The final funding amount will be determined in the Fire Fee Payment Agreement, to be completed prior to map recordation per County conditions of approval. The proposed project would be in compliance with applicable portions of the San Diego County Consolidated Fire Code and the Deer Springs Fire Protection District's Ordinance No. 2013-01. The proposed project also would be consistent with the 2013 California Building Code, Chapter 7A, 2013 California Fire Code, Chapter 49, as adopted by San Diego County. Impacts associated with the degradation of fire protection services and facilities would be **less than significant**.

- I -258-20** The comment states that the project would increase the housing supply in the area, but it would be unbalanced, because there would not be an adequate supply of lower cost starter homes or low income housing. The comment states that the project would result in additional traffic condition, and the proposed project would result in growth that is difficult to manage and would decrease the quality of life of citizens.

The comment states that the residents were not adequately noticed because of the way information was presented to the public and this will result in dissatisfied residents. The commenter explains that she realizes her concerns are likely to be pushed aside for interests of those would stand to earn a paycheck and walk away. The commenter explains that she is concerned about the large number of inconsistent statements in the EIR.

The County acknowledges the comment and notes it expresses the opinions of the commentator, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

- I -258-21** The comment states that she was not able to read all 8,000 pages of the EIR and if she was given the right to participate in the process, more time would have been given to her to review the document.

The Draft EIR was available for public review during a 60 day review period, which began on June 15, 2017 and ended on August 14, 2017. This review period was in accordance with the State CEQA Guidelines (Section 15105(a)), which states that the public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances.