

I-321 Kasturi Rangan

- I -321-1** The commenter thanks the County for the opportunity to comment. The commenter explains that they have comments regarding the unsuitability of the Project because of its location.

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 -321-2** The comment states that there would be a significant effort and enormous environmental impact associated with grading the terrain because the terrain is not suited for such development.

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 concerning the adequacy of the Draft EIR.

- I -321-3** The comment states that there are 15 significant environmental impacts and the mitigation measures to minimize the impacts are poor.

The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or 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 or necessary.

- I -321-4** The comment states that it would be a burden on the existing residential community to monitor environmental impacts and to seek enforcement from the County for 10 years.

The existing residential community is not responsible for monitoring construction or operational activities. The various parties responsible for enforcing public facilities maintenance are described in Section 4.4.2 of the Specific Plan (Appendix C of the Draft EIR). Additionally, the agencies and parties responsible for enforcing mitigation measures are described within the mitigation measures in Section 7 of the Draft EIR, List of Mitigation Measures and Environmental Design Considerations. The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section

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or analysis of the Draft EIR or 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 or necessary.

- I -321-5** The comment states that the combined effects resulting from simultaneous road and ramp building activities at Deer Springs Road and I-15 and the blasting, crushing, and grading activities at the Project site would be intolerable for residents and drivers using these roads.

The County acknowledges the comments and notes it does not raise any issue concerning the adequacy 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.

Nonetheless, construction traffic is analyzed in Section 2.13.9.1 of the Draft EIR.

- I -321-6** The comment states that a large housing project in a single water district could cause a lot of water restriction issues for existing users.

The following statement was published by VWD:

“The Vallecitos Water District is not in a drought emergency and therefore is not imposing any mandatory water-use cuts (reductions). In addition, the District would never impose water-use reductions to any customers to allow for any proposed development, including the Newland Sierra project.

To continue to provide reliable water service to our customers, Vallecitos is guided by its Master Plan, which analyzes existing and future land uses, as well as current water demands and trends, to evaluate the existing and future water needs for District customers well into the future. Even with the 1,624 acre-feet* of annual water demand projected for the proposed Newland Sierra development, the District has already anticipated greater water use (1,825 acre-feet per year) identified for this property during the 2017 Master Plan process without the development. In other words, even if this development moves forward, the District will have sufficient water supplies for all new and existing customers.

During the recent drought, the cutbacks to our customers were not due to a supply shortage, as Vallecitos had sufficient water supplies. The cutbacks were mandated by an Executive Order from Governor Brown. Even during the depth of the drought, Vallecitos’ water provider - the San Diego County Water Authority (SDCWA), projected 85,196 acre-feet of water in storage after assuming an additional three

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consecutive years of drought. Since the drought has ended, SDCWA now has 171,000 acre-feet of water in storage, and no restrictions on deliveries to the Vallecitos Water District, or any agency. This is in addition to the drought-resilient water available from the Pacific Ocean from the District's direct connection to the Claude "Bud" Lewis - Carlsbad Desalination Plant."²³¹

Regarding the proposed projects impacts to water supply, the DEIR analyzes water supply in Section 2.14.1, Water Supply and Service. The proposed project would increase overall demand for potable water; however, the DEIR compares the planned water usage for the project Site with the estimated water demand based on the proposed project land uses and water conservation measures and concludes the impacts to water supplies would be less than significance. 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 -321-7** The comment states that the Project seeks to change the zoning of the area and the draft EIR shows that there will be 15 significant impacts that result from this development. The comment states that the impacts on current residents in and around the proposed construction site for a 10 year period would be a devastating burden for them to bear. The comment asks why existing residents should put up with such a long period of blasting, rock crushing, and grading. The comment states that the resolution for this issue is that the terrain is unsuited to development of such a large housing complex and therefore the developer should be denied a permit that is not in accordance with the original zoning of the General Plan. The comment states that a similar housing project known as Merriam Mountains was turned down by the County officials several years ago and for such a large housing complex, the developer should seek another site which is more level and open.

The County acknowledges the comments and notes it does not raise any issue concerning the adequacy 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 -321-8** The comment states that the mitigation measures proposed for the Project are inadequate.

The commenter does not explain why the mitigation measures are inadequate; therefore, no response can be provided. The County will include the comment as part

²³¹ <http://www.vwd.org/Home/Components/News/News/2358/18?backlist=/>

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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.

The comment states that in the air quality discussion reference is made to a monitoring center located in East Valley Parkway, which is many miles from the Project site and would not register impacts associated with the Project.

The commenter is referring to Section 2.3.3.3 Air Quality Monitoring Data of the Draft EIR. Criteria air pollutant concentration data from the Escondido – East Valley Parkway monitoring station was used to characterize the existing ambient air quality at the Project site. The Escondido – East Valley Parkway monitoring station would not be used to monitor the Project’s criteria air pollutant emissions. 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 -321-9** The comment states that the Draft EIR discusses the use of a certified opacity observer once every 30 days to observe the dust emissions from rock crushing operations. The comment states that this would be inconsistent with the sophisticated technology available today.

The comment is correct in that mitigation measure M-AQ-4 requires that an opacity monitor be present once every 30 days to observe crushing activities. A monitor must be present to ensure that crushing activities do not exceed an opacity limit of 20 percent (or Number 1 on the Ringelmann Chart) as averaged over a 3 minute period in any period of 60 consecutive minutes, in accordance with SDAPCD Rule 50, Visible Emissions. The project proposes the use of an opacity monitor during crushing activities to ensure compliance with SDAPCD Rule 50, regardless if there is technology available to monitor opacity instead. The County acknowledges the comments and notes it does not raise any issue concerning the adequacy 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 -321-10** The comment states that the County has limited resources for compliance monitoring during Project construction and therefore the burden for notifying the County authorities of such violations would fall upon the existing residential community. The commenter asks if the residents should be subjected to this for 10 years during construction.

The existing residential community is not responsible for monitoring construction or operational activities. The various parties responsible for enforcing public facilities

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maintenance are described in Section 4.4.2 of the Specific Plan (Appendix C of the Draft EIR). Additionally, the agencies and parties responsible for enforcing mitigation measures are described within the mitigation measures in Section 7 of the Draft EIR, List of Mitigation Measures and Environmental Design Considerations. The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or 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 or necessary.

- I -321-11** The comment states that simultaneous construction of the Deer Springs Road expansion widening of ramps from/to Deer Springs Road from I-15, and the site blasting, crushing, and grading would create traffic and noise issues as well as dust and other emissions. The comment says this should be a deterrent for permitting the Project. The comment states that impacts would be relieved if road work were to occur first, but because this suggested sequencing might not suit the Project, the developer should consider an alternative site.

The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR or 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 or necessary.

- I -321-12** The comment states that a large housing project in a single water district could cause a lot of water restriction issues for existing users. Please refer to **Response to Comment I -334-6**.

- I -321-13 The commenter thanks the County for consideration of these issues. 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.

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