

I-23 PRESTON BROWN

Comment Letter I-23

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Member of the Jamul Dulzura Planning Committee Group

RE: Comments on the Notice of Preparation for OTAY RANCH VILLAGE 14 AND PLANNING AREAS 16 & 19, PDS2016-GPA-16-008,-SP-16-002, PDS2016-REZ-16-006, PDS2016-TM-5616, PDS2016-STP-16-027 and LOG NO. PDS2016-ER-16-19-006. (Village 14)

April 15, 2018
Greg Mattson, Project Manager
Planning and Development Services
5510 Overland Ave. Suite 310
San Diego, CA 92123

Dear Mr Mattson,

The DEIR is incomplete. It is impossible to evaluate the project and its alternatives in its current state. There are missing steps that should show how the housing layout and configuration strives to meet the intended and stated goals of the Otay Ranch Development Plan.

I - Environment: Missing- BALDWIN AGREEMENT. The Baldwin Agreement "eliminates the development entitlements" in Village 14 for 3 areas, PV1, PV2 and PV3. I could find no mention of this agreement and the preserved lands it has set aside. The MSCP Subarea Plan is mentioned everywhere yet there are no graphics and mapping that identify these or other relevant MSCP land preserves in and around the proposed development areas. Specific bubbles should show the location of vernal pools, corridors for wildlife, MSCP preserved lands, endangered habitat in relation to the a development plan proposal.

The Proctor Valley parcels are among the most ecologically important in San Diego County, essentially in holdings within the San Diego National Wildlife Refuge. The preserved lands in Village 14 are intended to protect the unique and imperiled vegetation and numerous rare species that exist in Proctor Valley.

The County needs to review the conflict of this proposal with the MSCP County Subarea Plan and Developer needs to overlay all the MSCP lands in play in the area to show how the project integrates its strategies with the rest of future Village developments.

II - Aesthetics: The Otay Ranch Phase 2 RMP and Otay Ranch Dev Plan Vol2, have extensive detail and descriptions on the delicate and sensitive approach that development must take to integrate itself into the environment. It talks about a transition from the city suburban housing clusters in Chula Vista to a more rural setting. The DEIR supplies lists of trees, plants and home types to be used but in actual layout fails to

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make the connection to how these fit together. We take a big leap to a solution of a map showing a re-stamping the tract type housing from Chula Vista onto the rural landscape countryside of Proctor Valley. Having strategies for design are essential for success of this project.

As an example, in presenting VIEWS, viewpoints show many external locations like the country roads as upgraded to concrete and curb or the housing stretching across a ridge line on a distant hill. In (Otay Ranch Dev Plan Vol2) "View Corridors" were mentioned as essential elements. There are no graphics that show how street and housing configurations creates "view corridors" from the point of view of residents using their streets. These views are valuable in opening up dead end canyons of streets and visually engaging the landscape outside of the walls of housing clusters.

III - Alternatives: Alternatives need to be based on real choices that are in play now not ones based on a series of "IF" possibilities of future lands swaps, restrictions waived, mitigation deals, and land acquisitions etc.. The developers need to show more definitely how the puzzle fits together on each alternative based on not a "fictional" future possibility of land entitlements.

In Project Alternatives, Chapter 4, in the Figures, (Figure 4-7, a-g) are difficult to understand. They are in low resolution black and white, poorly labeled, unreadable, and do not show a solution, a footprint of how each alternative would be shaped to integrate with the many layers of this fragile and threatened ecosystem. And again these maps are also missing MSCP designated preserved lands.

There is a fault of "cherry picking" of information from the MSCP. Maps that need to be included like Exhibit 1, Village 14 in the Baldwin Agreement, (Attachment 1) are exclude. However, maps like Exhibit 3, Village 15 are included (I am not sure why) and strangely key information like the source of the map and the 2 land areas designated for MSCP preserve, (SE1 and SE2 marked as hand drawn bubbles), are removed.

In Conclusion: I hope that County will recommend a revision of the DEIR to include more complete information, a commitment to design strategies showing how this development works with the environmental goals and is applied to realistic available land alternatives. In it's current state we are facing a maze of false choices with missing and incomplete information.

Sincerely,



Preston Brown

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