

O-2 JAMUL-DULZURA COMMUNITY PLANNING GROUP

Comment Letter O-2

JAMUL / DULZURA
COMMUNITY PLANNING GROUP
P.O. Box 613 • Jamul, CA 91935

April 12, 2018

Mark Wardlaw, Director
County of San Diego
Planning & Development Services
5510 Overland Avenue Suite 310
San Diego, CA 92123

Att: Greg Mattson

Subj: Otay Ranch Village 14 and Planning Areas 16 & 19, DEIR. PDS 2016-GPA-16-008; PDS2016-SP-16-002; PDS2016-REZ-16-006; PDS2016-TM-5616; PDS2016-ER-16-19-006; PDS2016 STP-16-027.

Dear Sirs:

The Jamul Dulzura Community Planning Group (JDCPG) is the elected body of the County of San Diego, responsible for land-use planning in the Jamul-Dulzura Sub-region, San Diego County. After reviewing in detail the subject Draft Environmental Impact Report (DEIR), the JDCPG, at our 10 April 2018 meeting, **voted 12 For, 0 Opposed, with 0 abstentions** to submit the following comments/concerns and to withhold our final recommendation on a chosen alternative pending completion of the final EIR.

The JDCPG carefully reviewed the Draft EIR through several sub-committee meetings, and would bring the following seven areas of concern to your attention and consideration: Growth Inducement, Traffic & Circulation Impacts, Wastewater Treatment, Public Safety, Recreational Considerations, Noise & Dark Skies Policies, and Agricultural Resources.

- **Growth Inducement:** It appears the growth inducement analysis relies upon outdated growth projections and neglects to analyze the growth inducing effects of the project on the Jamul-Dulzura Community Planning Area. Due to the size of the proposed project, and the extension of water, sewer, natural gas and electricity into areas not previously developed, it seems clear the project will induce growth in our community. Please provide clarification, regarding this analysis. The Jamul Village Core community is located approximately 1 mile to the north of the project site. Jamul is rural, as reflected by primarily large-lot estates and horse ranches. The Otay Ranch General Development Plan/Otay Subregional Plan master-planned community, including the project site, is the largest urban development adjacent and within the Jamul Community Planning area. The Master Planned Community as a whole covers

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an area approximately 1/5th the size of our entire Jamul Dulzura-Community Planning Area. Total single-family residential units (1,119) proposed by the project increases the population in our community by 3,580. The project is providing water, sewer, natural gas, and electricity into previously undeveloped areas. Please clarify how the project can extend urban infrastructure into an undeveloped area, without inducing growth. What mechanism/assurances exist to prevent sewer services from being extended into the rural residential areas of Jamul, resulting in serious and significant adverse "community character" effects? It appears these utilities could simply be extended into the Village Core area via the right-of-way within Proctor Valley Road.

- Please provide analysis traffic control measures to off-set the growth induced by the project within the rural residential areas of Jamul, between the northern limits of the proposed development and SR-94/Village Core areas. A clear path must be established for motorists, pedestrians, equestrians, bicyclists and off road vehicles to follow so that pass-through traffic from the development, headed to SR-94, does not wander through rural residential areas, thus increasing the resulting traffic hazards.
- The Proposed Project specifically excludes the State of California's ownership in Village 14 and Planning Area 16, which remains approved for development per the County's General Plan and the Otay Ranch GDP/SRP. Please include this future development in both the cumulative and growth inducement analysis.
- Please clarify if the growth inducement analysis in the EIR accounts for the fact that the original planning documents proposed septic in PA 16 & 19, not sewer. This was due to the fact that the community of Jamul does not support the extension of sewer within our planning boundaries.
- Why does the traffic impact analysis account for the hypothetical development of the state preserve property, while the growth-inducing impact analysis and cumulative analysis do not?

Traffic and Circulation Impacts:

- Proctor Valley Road provides the main access to Jamul from the project site, with secondary access via Whispering Meadows Lane through Planning Area 16. As proposed, the project does not include sufficient traffic, pedestrian, equestrian, cyclist or off-road vehicle improvements in the rural residential areas of Jamul, between these entry points and the Village Core/SR-94 area. The project is creating an improved road and pathway linkage from the urban Otay Ranch Villages and eastern territories of Chula Vista. These paths abruptly end at the edge of the northern project boundaries, of a rural residential community, currently plagued by hazardous roadways. Please analyze the existing roadway hazards that exist in the rural residential areas of Jamul located within the traffic study radius.
- The roadway segments and intersections identified below pose an increased hazard risk due to existing hazardous geometry, pavement, shoulder conditions, and lack of sight distance. Under existing conditions, these roadways cannot safely transport

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vehicles due to their curves. When project traffic is added to these roadways, said hazards will be increased to a significant level. Please analyze the following roadway intersections and segments to ensure no hazards to motorists, pedestrians, bicyclists, equestrians and off-road vehicles will occur:

1. Melody & SR-94
2. Proctor Valley Road & Coyote Road
3. Melody Road & Proctor Valley Road
4. Schlee Canyon Road & Proctor Valley Road
5. SR-94 and Maxfield Road
6. Pioneer & Proctor Valley Road
7. Maxfield Road & Proctor Valley Road
8. Lyons Valley Road & Jefferson Road (It is hazardous to make a turn at this intersection)
9. Whispering Meadows & Valley Knolls Road
10. Vista Diego & SR-94
11. Vista Sage & SR-94

- The Jamul area roadways consist of two narrow lanes that do not meet current traffic standards, lack shoulders, have no walkways, often contain 90 degree turns and contain no clear signage directing individuals to SR-94. The project's increase in traffic will result in a significant safety hazard by exacerbating the existing problem. Specifically, there are at least 8 school bus stops in this area of Jamul, where children have no safe pedestrian walkway under existing conditions and will be put at greater risk due to project's increase in traffic. A lack of bike lanes and shoulders creates conflicts between motorists, pedestrians and cyclists. Most recently, a child moving trash cans at the end of their driveway, near Pioneer Way and Proctor Valley Road, was struck by a car. (<https://www.nbcsandiego.com/news/local/Child-Struck-by-Car-in-Jamul-CHP-400308501.html>) Further, many horseback riders, mountain bikers and hikers regularly cross or travel Proctor Valley in order to get to one of the few entrances to the preserve. How does the project ensure these individuals will not be harmed by pass-through traffic from the development?
- The Project includes the construction of an approximately 4.5 mile Community Pathway along Proctor Valley Road from Chula Vista to Jamul, and a 1.5 mile park-to-park pedestrian connection. The Community Pathway along Proctor Valley Road would be a regional, multi-use facility between the City of Chula Vista boundary and the community of Jamul. The project is creating an improved road and pathway linkage from the urban Otay Ranch Villages and the eastern territories of Chula Vista that dumps into a rural residential community, plagued by hazardous roadways, with no improvements proposed. Please extend the community pathway all the way to SR-94 and the DG walkway from Whispering Meadow Lane all the way to SR-94.

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- Mitigation Measure M-TR-2 should be revised to read “The Proposed Project applicant, or its designee, shall coordinate with Caltrans to install a traffic signal at the intersection of SR-94 and Lyons Valley Road prior to issuance of a building permit for the 1st EDU.” This signal light cannot wait until the 741st house in this development is built. Traffic increases will begin from the start of construction!
- The rural residential road, Whispering Meadow Lane needs to be improved offsite (#12), along with Valley Knolls Road to Proctor Valley Road (#10) all the way to SR-94.

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Wastewater Treatment:

The sewer/septic feasibility study provided by applicant’s contractor, contains incomplete assumptions not supported by factual data. Paragraph 2 of the contractor’s study letter relies on “two principles reasons” for finding onsite wastewater treatment not feasible.

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- First, the analysis relies on San Diego County policy requiring sewer to be connecting to any lot abutting a public sewer. However, it is the applicant’s project design of lot and road locations that provides for, rather than avoids, the abutting of sewer lines to residential parcels. The “abutting” factor can be avoided by design changes such as placement of open space lots abutting sewer lines.
- Second, the analysis based on “incomplete” study data, results in an unsubstantiated conclusion of “not feasible”. None of the test sites in the Eastern area of PA 16 investigated sufficient open areas in each lot to justify a “not feasible” finding. An alternate onsite wastewater treatment system exists, which is endorsed by San Diego County Department of Environmental Health, and does not rely on “permeability” as the primary disbursement factor, was not sufficiently investigated in all areas of the proposed parcels in PAs 16 & 19. The provided feasibility study further states that the permeability of the “tested” areas are “not generally” conducive to onsite wastewater treatment. The “not generally” description is not proof of a prohibited soil condition on any proposed parcel. The number of residential lots within PAs 16 & 19 is not guaranteed.
- Third, it is important to note that Volume 2 of the Otay Ranch Master Plan, while not precluding sewer, does not mandate or guarantee the use of sewer. A complete and detailed investigation of all proposed residential parcels in PAs 16 & 19 is necessary. Without a detailed suitability study, the Jamul/Dulzura Community Plan’s prohibition to the use of sewer cannot be ignored or overridden.

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Public Safety:

- Adequacy of Fire Protection From Wild Fires and Emergency Vehicle Response Times.
- Adequacy of Evacuation Routes based on substandard roads to the north.

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While the DEIR does cover fire protection and emergency evacuation routes, it fails to recognize and overstates the capacity of existing roads, especially the northern evacuation routes which use the existing substandard two lane country roads.

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Recreational Considerations:

- The DEIR states “Northern Park (P-4) would be a 1.4-acre park located in the northwestern entry to Planning Areas 16/19. It is anticipated that Northern Park would provide a venue for passive and active recreational opportunities and community events.” What ratio was used to select 1.4 acres for the park closest to Jamul? This size appears too small to accommodate both internal and external generated use of a “Public Park” in our planning area. Currently, Jamul does not have any public parks that residents can frequent. It should be assumed in the analysis of the DEIR that residents across our community will travel to any new recreational facility built within our planning area and these facilities should be sized accordingly. Does this park include a staging area? For the safety of pedestrians, equestrians, cyclists and off-road vehicle users, the need for a staging area in the northern portion of the project site should be provided, within the boundaries of the Jamul planning area.
- In addition, the source of the maintenance fees for the public parks should be clearly identified.

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Environmental Concerns (Noise, Dark Skies Policy & MSCP):

- Were the single-family residential lots, adjacent to Proctor Valley Road within the community of Jamul – between the northern project boundary and SR-94 - analyzed for rear or side yard noise exposures, and will these residents get noise barriers? These off-site residences will experience traffic noise generated from the project and should be included in both the traffic and vibration analysis.
- Additional wording should be added to the noise mitigation measures so that local residents are provided with direct project contacts in the event they are experiencing unacceptable nuisance noise and need to make the project and County aware of the issue. This same wording should be added to the vibration plan mentioned in M-N-10.
- Request analysis of how this project adheres to JDCPG “Dark Skies Policy” recognizing the significant higher density in Village 14 and smaller lot sizes than presently exists in Jamul. The light pollution might significantly degrade the quality of existing dark skies in Jamul.
- Environmental analysis should include the impacts of the design on the MSCP areas in the project as previously agreed upon in the Baldwin Agreement signed November 10, 1995. The County needs to review the conflict of this proposal with the MSCP

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County Subarea Plan and needs to overlay all the Multiple Species Conservation Plan (MSCP) lands in play in the area to show how the project integrates its strategies with the rest of future Village developments.

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Agricultural Resources:

- The project is turning a significant portion of potentially grazing land into a master planned community and should provide meaningful preservation of our rural agricultural community character. Please clarify how the Otay Ranch Agricultural Plan clearly establishes a path for ensuring local agricultural resources will not be lost.
- The proposed urban development will permanently remove agricultural resources within an existing rural area and the Agricultural Plan for this development should support youth agricultural activities, such as providing 4-H and/or FFA chapter facilities to local schools (see community of Lakeside as an example) or providing lease agreements with local farmers for active agriculture. Is the agricultural mitigation land going to be put in active agriculture by the project applicant? Can the applicant lease the agricultural mitigation land to local farmers for their use? Adequate agricultural mitigation should include active agricultural activities, such as grazing, animal husbandry, orchards or row crops.

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Conclusion:

The Jamul Dulzura Community Planning Group appreciated the opportunity to review the Otay Ranch Village 14 and Planning Areas 16 & 19 Draft Environmental Impact Report, and we anticipate a thorough review will be given to our concerns. This project will have immediate and long-term impacts on our rural community with possible adverse, serious changes to our community character, impacting our established quality of life. We ask that you carefully analyze our concerns and suggested revisions.

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Respectfully submitted,



Michael Casinelli, Chair

cc: Adam Wilson, Staff, District 2 Supervisor
Rob Cameron, Jackson Pendo Development