

O-3 SIERRA CLUB SAN DIEGO

Comment Letter O-3

April 15, 2018

Mr. Gregory Mattson
San Diego County
Planning and Development Services
Project Processing Counter
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Gregory.mattson@sdcounty.ca.gov

Dear Mr. Matson:

This letter is written in opposition to the proposed Otay Ranch Village 14 and areas 16 and 19 and the accompanying DEIR. There are numerous problems with this project that will severely damage San Diego County, the sensitive environment along Proctor Valley Road, endangered plants and animals, and disturb and diminish the community character of a rural community. Moreover, it will contribute to metropolitan sprawl and create traffic nightmares for Chula Vista and Jamul and most of southern east county San Diego.

- 1) The cumulative impacts of this project are not adequately discussed. For example, the Hollywood Casino has already created terrible traffic congestion along two-lane California Highway 94, Lyons Valley Road, and Otay Lakes road. Likewise, the potential for future projects is not adequately discussed and dismissed as nonsignificant. The cumulative impact of Village 14 along with other projects such as the Hollywood Casino need to be discussed with regard to community character, the scenic rural setting along proctor valley road, and the cumulative impact on highways and from other projects along with the proposed village 14.
- 2) The traffic report is wholly inadequate and unreasonable. The DEIR describes various scenario at future dates. In several sections the DEIR admits that traffic impacts are "significant and unavoidable." Many of the analyses in the DEIR correctly indicate that sections of highways including CA 94 Interstate 805 are already at level F. Amazingly, the report then concludes that there would be no significant impact on traffic on these already almost gridlocked highways. We presume their logic is that once a road or an intersection is gridlocked additional traffic has no additional impact. This conclusion flies in the face of common sense. A bad situation

O-3-1
O-3-2
O-3-3
O-3-4
O-3-5
O-3-6
O-3-7
O-3-8
O-3-9
O-3-10
↓

CAN be made worse and the residents of over a thousand new homes WILL have a significantly negative impact on traffic. Moreover, the DEIR fails to account for residents north of Village 14 in Jamul, Dulzura, and Alpine and south of Village 14 in Eastlake and Chula Vista who will likely use the proposed two-lane Proctor Valley road as a through street north and south. This would substantially add to the traffic, yet nowhere in the DEIR is this additional traffic burden assessed nor is its impact on already heavily travelled roads.	<div>O-3-10</div> <div>Cont.</div> <div></div> <div>O-3-11</div>
3) The DEIR reports that the intersection of Lyons Valley Road and CA 94 is already at F status. They propose a traffic light at this intersection. A traffic light would not mitigate problems at the intersection of highway 94 and Lyons valley road which is subject to heavy traffic and frequent traffic jams. It would cause huge backups on both Highway 94 and in Lyons Valley road much as the traffic lights along 94 at Steel Canyon Road, Steel Canyon High School, and at Highway 54 lead to lengthy and unacceptable rush hour backups.	<div>I O-3-12</div> <div></div> <div>O-3-13</div>
4) The plans for the building of Otay Ranch were made in the early 1990's when the threat of greenhouse gasses and climate change were just beginning to be understood. Even with some of the proposed mitigations, the impact of construction, housing, and long commutes is substantial. The DEIR does an excellent job of documenting the negative impacts of climate change, global warming, and sea rise on the world and on Southern California in particular. The DEIR even admits to substantial increases in greenhouse gasses as a result of this project. Rather than contributing to this major climate problem by building this development in the backcountry of East San Diego County, the project would have significantly lesser impacts were it to be built in the already developed areas of Chula Vista or San Diego.	<div>O-3-14</div> <div>O-3-15</div> <div>O-3-16</div> <div>O-3-17</div>
5) The DEIR fails to adequately consider alternatives to the project. The California Environment Quality Act (CEQA) requires real alternatives to the project, yet the alternatives are just modified versions of the same project without providing an alternative in an already developed area of the county. Alternatives in a DEIR should be proposed for the good of the public not the benefit of the developer.	<div>O-3-18</div>
6) The DEIR proposes to plant 600 trees as mitigation to carbon produced by the project. But published research from our own San Diego State University has shown that coastal Sage Scrub and Chaparral are very	<div>O-3-19</div>

- efficient at carbon absorption and oxygen production (see “Mature semiarid chaparral ecosystems can be a significant sink for atmospheric carbon dioxide.” LUO, OECHEL, HASTINGS, ZULUETA, Y O N G H A I Q I A N and H Y O J U N G K W O N. Global Change Research Group, Department of Biology, San Diego State University, San Diego, CA 92182, USA *Global Change Biology* (2007) 13, 386–396). The DEIR fails to subtract the loss of carbon absorption from Chaparral from the carbon absorption of 600 trees. The analysis will likely find that despite the carbon sequestration from planting trees, there is significant loss in carbon absorption from the project contributing to a major net increase in greenhouse gasses and attendant climate change.
- 7) The project is proposed in one of the most environmentally sensitive areas of San Diego County. Proctor Valley, the site of the proposed Village 14 is an important wildlife corridor and connector between major, unspoiled, undeveloped tracts of land on Mount San Miguel, Otay Mountain (the San Ysidro Peaks), and the Jamul Mountains. This will inhibit the migration of numerous wild species and cause species segmentation and extinctions. Moreover, the project itself is being proposed for an area with numerous endangered plants, insects, reptiles, animals, and birds. Just regarding birds, this area has been identified as home to eagles, hawks, gnatcatchers and least bell’s vireo to name but a few. Much of this damage is admitted in the DEIR.
- 8) Additionally, the proposed Village 14 project will be built within the existing boundaries on 200 acres of the Multiple Species Conservation Plan (MSCP) land, an area that was set aside in perpetuity for preservation and conservation. The land exchange alternative will take 486 MSCP acres. Takings within the MSCP even with land exchanges are unacceptable and dangerous. Moreover, the land exchange portion of this project sets a dangerous precedent by suggesting that developers can build in the MSCP lands as long as they propose land exchange to aid in their projects.
- 9) The land proposed for conservation in the land exchange alternative in areas 16 and 19 is already sensitive and undeveloped habitat. There is no net gain of open space in the project. It is disingenuous and contemptuous to suggest the creation of a “new” undeveloped area that is already undeveloped. Thus, the taking of MSCP land in the land exchange is wholly inadequate and deceptive.
- O-3-19
Cont.
- O-3-20
- O-3-21
- O-3-22
- O-3-23
- O-3-24
- O-3-25
- O-3-26
- O-3-27

- 10) The project admits to building road, fences, and gated communities that inhibit species migration with no proposed mitigation. Indeed, fencing of the entire village is lauded as a mitigation measure. O-3-28
- 11) The areas surrounding Village 14 consist of dry chaparral and/or coastal sage scrub exacerbated by a prolonged and perhaps permanent drought condition. This is an extremely fire-prone area that can support large wildfires capable of a rapid spread into Chula Vista, Jamul, El Cajon, Rancho San Diego, Spring Valley, and San Diego. Development in such areas put the region at great fire risk from vehicles, back yard barbeques, landscaping equipment, and a host of other potential sources of fire. Indeed in 2007 much of the village 14 area was consumed by fire. Finally, the evacuation routes are very limited in case of a major fire. A two-lane proposed proctor valley road is inadequate for evacuation as are the heavily impacted roads in Chula Vista and the already jammed highway 94. This project significantly increases the chance for a major fire disaster. O-3-29
O-3-30
O-3-31
- 12) Visual Impacts and light pollution would both be substantial. The proposed project creates light pollution that impacts the dark skies of East County including both amateur stargazing and the Astronomical observatory operated by San Diego State University and the University of Illinois on Mount Laguna. Likewise, at the present time, there are no impaired scenic vistas along the entire length of Proctor Valley Road and this would instantly urbanized the entire scenic area of Mount San Miguel, Otay Mountain, and the Jamul Peaks. O-3-32
O-3-33
O-3-34
- 13) Finally this project result in severe permanent, direct impacts to the area. As the DEIR states:
- Existing on-site natural resources would be removed as part of the Proposed Project. Implementation of the Proposed Project would result in permanent, direct impacts to approximately 689.7 acres of vegetation communities within Village 14 and Planning Areas 16/19. A total of 45.2 acres of off-site permanent and temporary direct impacts to lands owned by the California Department of Fish and Wildlife and City of San Diego Water Utilities Department would result from Proposed Project road grading. Most of the indirect impacts to vegetation communities and special-status plants can also affect special-status wildlife. O-3-35
- The DEIR claims that mitigation can compensate for the permanent direct impacts, which are in fact virtually impossible. Mitigation cannot recreate this habitat, replace this vegetation and land forms, or provide homes for the animal species that are killed or removed. There is no comparable land O-3-36

to use for mitigation. Moreover, if similar land is found for mitigation it is already undeveloped, thus the mitigation is imaginary and no further land is actually added. Additionally, some of the lands used in the proposed project are not eligible for mitigation under the MSCP agreements.

↑ O-3-36
| Cont.
| O-3-37
| O-3-38
|

Sincerely

Dr. Peter Andersen, Vice Chair
Sierra Club San Diego

Dr. George Courser, Chair
Sierra Club San Diego Conservation Committee

INTENTIONALLY LEFT BLANK