

I-205 Steve Hutchison

Comment Letter I-205

Comments on Newland Sierra Development Project [the project]
By Steve Hutchison, 31290 Munster Platz Way, Valley Center, CA

General Plan Amendment (PDS2015-GPA-15-001), a Specific Plan (PDS2015-SP-15-001), a Rezone (PDS2015-REZ-15-001), a Tentative Map (PDS2015-TM-5597), and a draft Habitat Loss Permit (PDSXXXX-HLP-XXX)

Surprisingly, the County of San Diego has chosen to reconsider this project, despite the initial rejection of it in 2010 by the Board of Supervisors [BOS], in the form of Merriam Mountain, and following an overwhelming defeat by voters of the entire county of Lilac Hills Ranch [LHR], a project with very similar characteristics and issues. Very little of significance has changed since the project was rejected seven years ago.

I-205-1

The project does not comport with any reasonable or literate interpretation of the San Diego County General Plan that was updated in 2011. Among the Guiding Principles of the general plan, principle 1 suggests the county must accommodate a fair share of anticipated growth. The proponents of the project and county staff suggest that the project will support this principle. However, the general plan, as required by the state housing law, has already apportioned that future growth within the unincorporated areas with appropriate land use regulations that the project proposes to amend by adding density in otherwise rural/semi rural lands not designated for such density in the plan. The project will increase density where it is not planned and thereby encourage further urban sprawl by its presence. The General Plan was completed through compromise among a slew of interest groups and individuals, to reinterpret it after adoption is counterproductive.

I-205-2
I-205-3
I-205-4

Principle 2 describes how growth is to be accommodated near existing centers of services rather than leapfrogging growth into areas that would require extension of services [roads, sewers, schools, police, fire protection, water, etc.] into more rural areas. This principle also describes, consequently, how open space and rural lands can be protected from runaway development. The project flouts this principle flagrantly by attempting to amend the general plan to allow the project and its urban densities where it was not anticipated or recommended. The location of the project must be governed by general plan policies that address this principle [e.g. policies LU 1.2, LU-1.3 and LU1.4]. Land use policy LU-1.2 specifically requires such projects as this to comply with LEED-ND standards, which have prerequisites for location adjacent to existing infrastructure and development. The project is a clear example of leapfrog development that does not meet the requirements to qualify for LEED-ND certification. Land use goal LU-2 expresses the need to maintain the county's rural character. The project attempts to slide by this goal by designating a significant portion of the project site as open space. The project fails to acknowledge that LU-2 was already expressed thoughtfully in the General Plan land use maps before the project's proposed amendment and that the amendment will materially alter the intention of the General Plan land use designations. And, while the General Plan can be amended, the proposed amendment does not reflect the underlying

I-205-5
I-205-6
I-205-7
I-205-8

intent of the General Plan to consolidate density in areas where it already exists in order to achieve the efficiency of supporting infrastructure.

I-205-8
↑
Cont.

The proponents and county staff seem to recognize the “village” at the intersection of I-15 and Deer Springs Road, but they fail to recognize the need to factor the hilly and ridged topography surrounding the so-called village into the determination of whether that “village” can be reasonably expanded according to the Community Development Model. Conservation and Open Space policies discourage ridgeline development [COS 12.1 & COS 12.2] while at the same time call for compact development of villages in respect of the Community Development Model [COS 14.1]. The project will severely grade the project site and will traverse the ridgeline that ascends from the intersection of I-15 and Deer Springs Road among others farther west.

I-205-9

Guiding principle 3 calls for the project to enhance the local economy. The project is more likely to displace the existing businesses at the intersection of I-15 and Deer Springs Rd.

I-205-10

Guiding principle 4, regarding environmental stewardship, has been essentially ignored by the project. After identifying listed endangered and or threatened species of plants and animals, the project expects to mitigate the impacts and proceed to build. The project provides no scientific evidence to ensure that the sensitive species will be protected or preserved as required by the guiding principle. The fences proposed will impede wildlife transit in an area within the MSCP and near MSCP preserves. The project admits the loss of important habitat for a variety of native species with their request for a Habitat Loss Permit.

I-205-11

I-205-12

I-205-13

Fire will be a challenge for the project, despite the requirements of Guiding Principle 5. The fire fighting resources of the Deer Springs Fire Protection District will not be adequate to provide first responder support during a major brush fire even with mutual aid. The project is located in a known Very High Fire Hazard risk area. It will have limited ingress and egress for both residents and fire fighting resources. This is an obvious risk for a project that could better be located nearer the kinds of services it will require.

I-205-14

I-205-15

I-205-16

Multimodal transportation, as outlined in Guiding Principle 6 is given a brief paragraph in the 190-page Transportation section of the EIR. Clearly, so little is said because so little exists or is proposed. The EIR hints at a possible future bus route and notes an express route from Riverside to Escondido [with no stops along the way]. Given the current emphasis on VMT, to have no public mass transit options for such a large proposed project is beyond unreasonable [Mobility Element policy M-8 calls for public transit to reduce VMT]. The proponents must be conditioned to provide connectivity to the Escondido Transit Center or some other transit center. Such transit options currently don't exist because the General Plan wisely anticipated that projects on the scale of this project would be built closer to existing facilities and resources. To throw a wrench into the General Plan by allowing the

I-205-17

I-205-18
↓

project to go forward would be the antithesis of planning. The project also cites bike paths and pedestrian paths to address 'walkability' and multimodality, but given the topography of the project site and distances to amenities, few residents will be induced to utilize human powered modes to the extent anticipated in the EIR.

The Transportation section also suggests that there will be a direct impact on I-15 from Deer Springs Road to Pomerado Road. This direct impact is apparently based on the "study area" adopted for the project. The study area conveniently excludes other major proposed developments to the north [e.g. Lilac Hills Ranch, Campus Park] that will add to the cumulative impact on I-15. In fact, the CalTrans response to the Lilac Hills Ranch [~7.5 miles north of the project] traffic study indicated that the impact would extend from the Riverside County line to Highway 78 at least. So, the limited study area for the project likely underestimates the direct impact on I-15. The study area should have been extended from the Riverside County line to I-8 to get a regional view of the impacts. Further, the EIR states that there is no mechanism for contributing to a mitigation effort for I-15 significant but unavoidable impacts by the project, but CalTrans has stated that such a mechanism does exist and should be a required condition of approval for the project.

Guiding Principle 7 relates to sustainability. Given the project's inappropriate rural location, its defiance of the community development model, its direct impacts on environmental stewardship, its susceptibility to wildfires, its lack of multimodal transportation options that will serve up excessive VMT and its need to extend much of the infrastructure it requires into an area for which it is not planned, the use of the term sustainability in connection with the project seems preposterous. The project is a principal example of unsustainable, inappropriate and undesirable growth.

Guiding Principle 9's emphasis on the costs of extending infrastructure to new development is clear. Even when development is properly located near existing infrastructure, the costs generally exceed the tax revenues generated by the development. Given that analysis, putting the project at its remote location only exacerbates those associated infrastructure costs. Further, extending infrastructure to remote rural lands also encourages additional leapfrog development that flouts most of the Guiding Principles and Policies of the General Plan.

The EIR does not adequately address the impacts of the project, determining that most are mitigable, unavoidable or insignificant in spite of the intentions of the General Plan.



INTENTIONALLY LEFT BLANK