

## ***Back Country Coalition***

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**Via Electronic Mail**

San Diego County DPDS

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**RE: Proposed Newland Sierra General Plan Amendment – OPPOSITION  
PDS2015-GPA-15-001; PDS2015-SP-15-001; PDS2015-REZ-15-001;  
PDS2015TM5597**

The Back Country Coalition has been involved with San Diego County's General Plan Update since 1998. As an active member of the Interest Group Committee, we participated continually in developing the principles and guidelines that were to direct future growth within San Diego County's unincorporated areas in a responsible and intelligent direction. The referenced project ignores and disregards the work of many experts and dedicated professional people who worked to achieve an excellent plan over many years. Instead, the referenced project proposes a dangerous, leapfrog urban development in the middle of a rural residential area.

County staff and developer Newland Sierra are resurrecting the subject project which has been proven to be a planning failure. Here we have the public being force fed a dreaded second "bite of the apple" so loathed by the Red Tape Reduction Task Force, as the main planning objective. The cosmetic and miniscule changes in design elements advanced in scoping do not succeed in reducing the outright danger and significant adverse health, well being and environmental impacts the project would present for existing residents.

What is categorically absent from this attempt to destroy the County's 2011 General Plan Update are the original scoping opposition comments from the predecessor Stonegate/Merriam Mountains project; project concepts that were rejected outright by the County Board of Supervisors and thousands of citizens who were involved in its defeat. Scoping and DEIR comments related to the physical alterations of land forms, fire hazards, traffic, emergency evacuations, archeology, water supply, greenhouse gas generation and silica particulate contamination are now more relevant and topical than the day Merriam was dismissed as a failure of planning by the County Board of Supervisors and the then-employed DPLU management and staff.

These long identified project defects pose increased relevance, danger and permanent significant negative environmental and health impacts to the present adjacent residents, but also Escondido, City of San Marcos, Lawrence Welk community, Hidden Meadows, Gopher Canyon, Twin Oaks, Vista, Bonsall and the region.

WE HEREBY INCORPORATE INTO THIS LETTER BY REFERENCE ALL OPPOSITION COMMENTS THAT RESPONDED TO THE DEIR OF THE STONEGATE/MERRIAM MOUNTAIN PROJECT REJECTED BY THE SAN DIEGO BOARD OF SUPERVISORS MARCH 24, 2010. Any attempt by DPDS management and staff to ignore, discount or claim as untimely these archived comments would not only be disingenuous but would be a violation of CEQA mandates governing public participation.

There is a comprehensive and long established record of the public's clear refusal to accept the dangers to public health and safety inflicted by the County/Developer schemes on this property. Opponents of the previous project are still active and fully engaged with the same objections to the proposed Sierra project. These exact arguments were upheld in the initial failure of the Merriam Mountain/Stonegate proposal at the Board of Supervisors, as well as Supervisor Ron Roberts' personal dismantling of the Merriam project after five hours of additional Board examination. A failure by DPDS to recognize the public's historically overwhelming rejection of Merriam would prove as significant as refusing to acknowledge Supervisor Roberts' project criticisms.

Scoping is crucially important to the project review process - as is integrity. The interested and fully involved public was denied integrity at the Sierra scoping hearing by DPDS, who claimed the DPDS staff had not taken a positive or negative position on the Sierra proposal, and that it would not make such a decision "until all the facts are known." That statement is ludicrous because of the close similarity between the proposed Sierra project and the rejected Merriam Mountain project. No project, even the most egregious example, has ever been abandoned by County planning during a Board of Supervisors project hearing.

DPDS' stated claims to offer an independent, level playing field, to be an unbiased County department, with no interest in project success or denial is the very height of irresponsible misinformation and should require a thorough investigation by County Counsel to prevent any such false and misleading statements in the future.

You will note that, despite all of the County's resources, County DPDS staff and management stated at the onset that the scoping meeting would not be recorded. That clear failure to maintain or examine a scoping record, and consider public opinions expressed, goes to the heart of how County DPDS is demonstrating it is unworthy of public trust. The actions of DPDS' agency approval begins when the agency commits to a definite course of action, i.e. following a pre-application examination moving the project forward to a course of scoping.

The scope of the proposed Newland Sierra project's negative impacts to transportation would be so far-reaching and profound that communication and comments must be sought from federal, state, local cities, local community planning and sponsor groups' jurisdictions.

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Temecula government planners may have particular reason to comment because of the existing and proposed uses of Deer Springs Road, which would create even more traffic gridlock for commuters to and from their city. Wide ranging comments would also be critical as well as an independent study to determine the adequacy of the existing bridge over I-15, expansion of off and on ramps, widening of road shoulders, increasing the number of emergency stop areas, as well as bicycle lanes and pedestrian crossings and access.

While the following block quotation from “Guidelines for CEQA” is self-explanatory, we nonetheless include it herein for clarity relating to significant adverse traffic impacts to the entire region from the proposed referenced project.

**“Guidelines for California Environmental Quality Act**

**California Code of Regulations Title 14 Natural Resources Division 6 Resources  
Agency Chapter 3 Guidelines for Implementation of California Environmental Quality  
Act Article 13 Review and Evaluation of EIRs and Negative Declarations**

**Consultation with Public Agencies, Transportation Planning Agencies:** PRC Section 21092.4 further *requires* the lead agency for a project which would have statewide, regional, or areawide significance to consult with the regional transportation planning agency and public agencies that have transportation facilities which could be affected. Statewide, regional or areawide significance is defined in Guidelines Section 15206.” (emphasis added)

Please place this communication in the permanent administrative record for the Newland Sierra proposed project. Thank you.

Sincerely,

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cc: San Diego County Board of Supervisors  
Interested parties