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E. Shearer-Nguyen, Environmental Planner,
City of San Diego Development Services Center,
1222 1st Avenue, MS 501,
San Diego, CA 92101,

Via e-mail to DSDEAS@sandiego.gov.

Dear Ms. Shearer-Nguyen and City Council:

Sierra Club San Diego strongly opposes the proposed Trails at Carmel Mountain Ranch Project (heretofore the Project) in its current form. The Project violates the many provisions of the California Environment Quality Act (CEQA). The Project destroys the community character of Carmel Mountain Ranch and presents a number of unmitigable environmental impacts.

Sierra Club is not opposed to a more modest project consisting of 150-250 single family and attached homes, with 15% of the homes categorized as, "affordable housing."

Considerable environmental damage will result from this project. Additionally, the EIR is deficient in many respects. The Project will result in the destruction of community character, loss of open space and parkland, increased wildfire risk, increased evacuation risk, creation of more sprawl housing, massive increases in greenhouse gas exacerbating climate change, reduced air quality, and more

gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigatable environmental impacts.

Destruction of Community Character

Without a doubt the Project does great harm to the community character of Carmel Mountain Ranch. Under CEQA a project must be consistent with community character. First, residents of Carmel Mountain Ranch purchased their homes under the assumption that open space and green space would be a prominent feature of their community. They had good reason to believe that green space would characterize the community since, the project site is designated Park, Open Space, and Recreation in the General Plan.” (5.7-16 of EIR). Moreover the original sales and marketing materials for Carmel Mountain Ranch featured inducements to buy onto “Spectacular 18-hole golf course” and “Fairway Views.”

The community plan for Carmel Mountain Ranch “establishes a community identity for Carmel Mountain Ranch through a consistent focus on topographic character and landscaping.” The community plan promises, “A community theme has been developed for Carmel Mountain Ranch to establish a distinctive identity for this new community along the I-15 corridor. The theme incorporates the extensive use of boulders, stone material, topographic relief and landscaping throughout the community to create an attractive image that will integrate the existing character of the site with the planned urban development.” It also says: “The topographic character of the site will be retained by preserving the more scenic areas on site as natural open space and by incorporating special grading and landscaping design guidelines within the urbanized area of the community.”

Construction of 1200 condos, apartments, and town homes is totally inconsistent with the community character of Carmel Mountain Ranch. The Project destroys much of the green space and visual aesthetics that the current residents enjoy. The open space, natural features, and natural topography will be destroyed by grading the terrain and by shoehorning a dense development into former open space. Moreover, the vast majority of structures in Carmel Mountain Ranch are single family homes. The proposed project consists entirely of town homes and three and four story apartment buildings and condos, which are wholly

inconsistent with the community character and destroy the visual character of Carmel Mountain Ranch.

The inconsistency of the community character with this project is exemplified by the fact that according to the EIR “The Project requires a General Plan Amendment, Community Plan Amendment, Rezone, Master Planned Development Plan, Site Development Permit for Environmentally Sensitive Lands, and Vesting Tentative Map.” Such major amendments and alterations in the proposed plans would be unnecessary if this project was remotely consistent with the community character of Carmel Mountain Ranch.

Loss of Open Space and Park Land

The EIR suggests the Project will expand designated park land. EIR makes it seem like the Project is providing 112 acres of open space and parkland. In reality, the Project would result in the reduction of 52 acres of open space. The greatest amount of open space would be provided by the “no project alternative” in the EIR. Sierra Club San Diego is committed to no net loss of open space. The EIR is deficient in that it attempts to hide the loss of open space and recreational land.

The EIR clearly states: “The project site is designated Park, Open Space, and Recreation in the General Plan.” (5.7-16). The City of San Diego General Plan states: “The General Plan is the foundation upon which all land use decisions in the City are based. It expresses a citywide vision and provides a comprehensive policy.” The City of San Diego climate action plan establishes the protection of open space as an important goal: “Protect Open Space, Parks and Recreation Parks and open space are important resources that contribute to San Diego’s culture, character, and economy.” Green spaces offer recreational and tourism opportunities. They also serve as a climate change adaptation resource where they can alleviate the heat island effect and potentially reduce the impact of flooding.” There are numerous redevelopment sites for new housing including vacant industrial land, parking lots, and post-pandemic empty commercial property. Sierra Club San Diego believes that building new development on park land or open space is not in the best interest of San Diego or the environment.

Additionally, the EIR blatantly violates Senate bill 375 requires that California preserve open space and not build large housing projects on open space and park land.

Increased Wildfire Risk

Carmel Mountain Ranch is in a State-designated Very High Fire Severity Zone. As stated in the EIR, the fire history according to available data from CAL FIRE's Fire and Resource Assessment Program (CAL FIRE 2018a) approximately 55 fires have burned within 5 miles of the project site since the beginning of the historical fire data record (Appendix D). These fires occurred between in 1910 and 2014, with some years including more than one fire. Three of the fires in the historical record burned on the actual project site, including the 1943 unnamed fire that burned roughly 40,000 total acres, the 1967 unnamed fire that burned roughly 29,000 total acres, and the 1980 Assist No. 138 Fire that burned roughly 1,200 total acres. These fires preceded development of the site. The nearby Witch fire in 2007 burned over 200,000 acres in North County including the nearby communities of Ramona, Rancho Bernardo, Poway, and Escondido and burned for over 2 weeks. It destroyed over 1,000 residences including 365 in Rancho Bernardo just north of the Project and 90 homes in Poway, just east of the Project.

Building in very high fire severity zones is so dangerous that numerous bills to prohibit development in such dangerous areas have been introduced in the California legislature. The City has no recent experience with large sprawl developments, certainly none since the fires of 2003 and 2007. The prolonged draught and deadly fires should give the City great pause in approving such a project.

Building in very high fire severity zones is dangerous for three reasons:

1. Additional residences increases the risk of human generated fire from normal human activities (vehicles, power equipment, barbecues, etc.).
2. Building in a high fire zone increases the impacts on people and property when a fire occurs.
3. Evacuation from a high fire severity zone is exacerbated by increased development (see the next section dealing with evacuation).

The EIR acknowledges that the Project is in a Very High Fire Hazard Severity Zone. The project site is classified as an extreme high fire severity zone per the state map on grid tiles 35, 36, and 40 (City of San Diego 2009). Fire Hazard Severity Zones are based on increasing fire hazard and are designated as "No

Designation,” “Moderate,” “High,” or “Very High.” The EIR says is that brush management program will be instituted but these are only partially effective during wildfires. The EIR acknowledges that wildfire is a great risk for the Project when they state “Each unit within the project is proposed to have a private domestic water system and a private fire protection system.” While these may help residents to a limited degree, a wildfire could easily incinerate residences with such systems as has been seen in numerous fires across this state and county in the last several years. Sierra Club opposes large developments in very high wildfire hazard zones.

The EIR is deficient in that it does not adequately assess the risk of wildfire and erroneously concludes: “The Project would comply with applicable state and City standards associated with fire hazards and prevention, including alternative compliance measures. Therefore, potential impacts related to wildfire hazards would be less than significant.” The EIR fails to focus on wind driven Santa Ana fires that can burn thousands of acres in hours. The EIR focuses repetitively on brush management strategies (which is laudable) but fails to assess the risk of wildfires to the project and the liability associated and loss of life associated with building in a very high fire zone.

Increased Evacuation Risk

Evacuation from Carmel Mountain Ranch in the event of a wildfire will be extremely difficult and the proposed 1200 homes and 3500+ residents exacerbate an already dangerous situation. Most wildfires come the east during wind-driven Santa Ana conditions. Although large thoroughfares and freeways do exist in the area (Routes 15 and 56, Ted Williams Parkway and Pomarado road) these exits will be swamped by residents fleeing other large communities to the north and east including Poway, Rancho Bernardo, Ramona, Escondido and others.

Everyday traffic can create jams and stoppages. The city of Poway conducted a study of the area just east of Carmel Mountain Ranch and concluded:

“The areas adjacent to the study corridor are largely low-density residential neighborhoods. Community residents have expressed concern about the potential for new development projects to further exacerbate existing traffic congestion, cut-through traffic, and increase delays and travel time.”

Ted Williams Parkway dead ends at Twin Peaks Road. The Study concluded “Twin Peaks Road and Espola Road experience heavy traffic during morning and evening commute hours and in the afternoon when the schools get out.”

<https://www.poway.org/DocumentCenter/View/3917/Twin-Peaks-Road-Study-of-Traffic-February-2017?bidId=>

The Poway report shows that some of the intersections are rated D and E indicating high levels of congestion. This is during routine rush hour traffic, not during an advancing wildfire where evacuation could be nearly impossible.

Most sections of the EIR mention evacuations only in passing and refer to city evacuation plans with no mention of the greater burden placed on an evacuation with a 1200 home infill project in the heart of Carmel Mountain Ranch. In section 5.19.3 an important question is posed: “Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?” Unfortunately, the analysis in the EIR is lacking, referring to MHMP and EOP of the City of San Diego. Amazingly, the EIR erroneously concludes, “The project would not impair or physically interfere with an adopted emergency response or evacuation plan and impacts would be less than significant” without any traffic studies or wildfire scenarios that would determine the impact of a large infill project on evacuation.

The EIR is devoid of meaningful evacuation analysis, but prior large wildfires in the area in 2003 and 2007 provide a vivid account of major evacuation problems.

In 2003 the Cedar fire to the south and west of Carmel Mountain Ranch offers another case study of a major fire in this region. “The **Cedar Fire** was a massive, highly-destructive wildfire, which burned 273,246 acres (1,106 km²) of land in San Diego County, California, during October and November 2003.^{[2][3]} The fire's rapid growth was driven by the Santa Ana winds, causing the fire to spread at a rate of 3,600 acres (15 km²) per hour.^[2] By the time the fire was fully contained on November 4, it had destroyed 2,820 buildings (including 2,232 homes) and killed 15 people, including one firefighter.^[2] Hotspots continued to burn within the Cedar Fire's perimeter until December 5, 2003, when the fire was fully brought under control.”

https://en.wikipedia.org/wiki/Cedar_Fire

In the 2003 Cedar Fire, evacuations were problematic. According to Richard Hawkins, Fire Staff Officer for Cleveland National Forest. “This county has no culture regarding evacuation plans. The only community that had an evacuation plan prior to the Cedar Fire was Palomar Mountain. Where evacuation plans were in place and practiced, like Palomar Mountain, evacuations went well. Where they were not in place, like the majority of San Diego County and the entire perimeter of the Cedar Fire, evacuation did not go well. ”

In the Cedar fire “many of those killed were trapped by the flames which were driven by 60-mile-per-hour (97 km/h) winds that propelled the flames faster than residents could flee.^[14] Of those killed, 13 died in the first 24 hours of the fire. At least 10 people were trapped in their vehicles trying to outrun the flames.” https://en.wikipedia.org/wiki/Cedar_Fire

Expert analysis of the 2003 fire recommend that new developments should be tied to the ability to evacuate (In Wildland Fires, Lessons Learned).

In his 2005 publication “Public Safety in the Urban-Wildland Interface: Should Fire-Prone Communities Have a Maximum Occupancy?” Thomas Cova reports that in many areas of the United States, housing is increasing without a commensurate improvement in primary road networks. He indicates that this dilemma compromises our public safety, making emergency evacuation times too long in duration—as the risk of wildland and structural fuels in the interface increases. To help address this situation, the suggestion has been made to link building codes to maximum occupancy in an enclosed space—as well as outlining the required number, capacity, and arrangement of exits.”

<https://nsjfire.org/wp-content/uploads/2014/04/Faces-20031.pdf>

In 2007 more wildfires ravaged San Diego County. The Witch Fire in nearby Poway and Rancho Bernardo resulted in many lost homes and large scale evacuations.

The Union Tribune reported that this was natural disaster of staggering scope, San Diego County’s 2007 firestorms killed 10 people and destroyed 1,738 homes. Flames consumed 368,316 acres, an area larger than the city of Los Angeles. More than 500,000 people were evacuated, exceeding the number of Hurricane Katrina

evacuees. Motels across the county overflowed with people who were dislocated; others bunked down at the Del Mar Fairgrounds and what was then Qualcomm Stadium. “This is the new normal we live with,” [fire chief] Mecham said. “Fires are something that no longer stay in the backcountry.” A recent county survey showed that only **50 percent of residents could evacuate their homes within 15 minutes.**

“It’s eerie when I talk to neighbors now,” said Jack Beren, a Rancho Bernardo resident who lost two homes in the 2007 fires. “It’s yesterday’s news. But this is not like lightning. It does strike twice in the same place.”

(<https://www.sandiegouniontribune.com/news/wildfire/sd-me-witch-creek-20171010-story.html>).

The 2007 Witch fire jammed roads, preventing rapid evacuation. A Union Tribune article states, “Fire officials evacuated the entire community of Ramona late last night as the Witch fire consumed at least 8,000 acres and sent flames more than 100 feet into the air. Roads out of the town were jammed as people sought safety after authorities contacted 10,000 households by phone at 9:15 p.m. Ramona’s population is 36,000.”

(<https://www.sandiegouniontribune.com/sdut-witch-fire-prompts-evacuation-ramona-2007oct22-story.html>)

According to Wikipedia, “On Monday, October 22, 2007, the Santa Ana winds peaked, reaching sustained wind speeds of 90 mph (140 km/h), with winds gusting up to 112 mph (180 km/h). The extremely powerful Santa Ana winds fanned the wildfires in Southern California, causing many of the wildfires to rapidly expand westward. At 1:30 AM PDT on October 22, 2007, the Guejito Fire ignited southeast of the San Diego Wild Animal Park, within the San Pasqual River drainage. By 4:30 AM PDT, the Guejito Fire rapidly expanded to Interstate 15, forcing the closure of the freeway in both directions, which disrupted some evacuations from areas affected by the Witch Creek Fire.

[https://en.wikipedia.org/wiki/Witch_Fire#:~:text=On%20the%20morning%20of%20October,the%20City%20of%20San%20Diego].

The EIR contains no analysis of various fire scenarios, the impact of closed freeways and highways, or both the ability of residents of the Project to evacuate or the Projects impact on the potential of other residents in Carmel Mountain Ranch and surrounding communities to evacuate.

Considerably more residents live in the communities around Carmel Mountain Ranch than lived there in 2003 and 2007. Residents of the area deserve a substantive fire evacuation study including the cumulative impact on evacuation of addition of 3000+ residents in the Trails at Carmel Mountain Ranch. To offer less than a detailed analysis represents a severe danger to the lives of Carmel Mountain Ranch residents.

Importantly, the EIR concludes that there will be unmitigated impacts to Transportation, even under normal circumstances let alone during a wildfire.

Clearly, the lack of a substantive analysis of wildfire scenarios and their impact on evacuations is a violation of CEQA and cause for rejection of the EIR and denial of project approval.

Creates more Sprawl Housing

Sierra Club San Diego recognizes the need for housing, particularly urban infill and low income housing. However, this Project is not really infill. Although located with the City of San Diego, Carmel Mountain Ranch is suburban development. Infill not appropriate for suburban periphery of San Diego. The EIR states: “the proposed project would introduce a population beyond what is planned for the project site.” The 1200 proposed homes is excessive resulting in reduced quality community character, crowding, high Vehicles miles travelled (VMT; see Climate Change section below). Sierra Club San Diego would support a project of approximately 200 hundred homes that are a mix of single family home, multi-family multifamily homes, and rentals.

The EIR states: “The site is primarily characterized by developed land/disturbed habitat (comprised of graded and previously maintained areas of the golf course as well as ornamental plantings and landscaping associated with the golf course use) and **some native habitat (upland and wetland species).**” Open space should not be converted to suburban sprawl development within the city of San Diego or

elsewhere. This is one of the largest sprawl developments in the past several decades in San Diego and should require great scrutiny.

According to the City of San Diego *Land Use and Community Planning Element*, “it is the City of San Diego’s practice to apply zoning that is consistent with community plan land use designations to ensure their implementation.”

<https://www.sandiego.gov/sites/default/files/legacy/planning/genplan/pdf/generalplan/lu061016.pdf> The Sierra Club supports San Diego’s community planning element and urges the City to reject environmentally harmful amendments to the City’s plan.

Massive Increase in Greenhouse Gas

The huge amount of greenhouse gas (GHG) released from this project exceeds any GHG goals of the Climate Action Plans of the City of San Diego and State of California. The project will result in a massive increase in GHG even after some minor mitigations on the City of San Diego checklist are implemented. This project does not take us closer to the 1990 GHG levels, the goal of the City’s Climate Action Plan; it would not even come close to maintaining GHG at 2021 GHG levels.

First, the Project will produce massive amounts of GHG and air pollution during construction. The EIR reports that “diesel-fueled construction equipment would operate for an estimated 426,832 hours” that would produce enormous amounts of unmitigated GHG. Similarly construction workers would use 452,029 gallons of gasoline. The EIR indicates that the “Proposed project construction would include 957,607 cubic yards of cut and 995,763 cubic yards of fill as represented in the grading phase, which would require 38,156 cubic yards of import.” Of course the EIR acknowledges that “Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered vehicles.” According to the EIR construction equipment would be run for 426,832 hours. But **nowhere** in the EIR do we see a total amount of GHG generated during 5 years of construction.

Second the Project will produce even more GHG even more during the operation of the 1200 homes with over 3000 residents. The EIR admits that “the project will continue to have a significant and unavoidable VMT transportation impact” (5.2-

10). This is a noteworthy admission that indicates clearly that project will have long term negative impacts on traffic and GHG.

The EIR states that these increases in GHG is unavoidable, which is blatantly false. GHG could be mitigated with offsite GHG mitigations elsewhere in the city or county. It can also be completely mitigated with the no project alternative.

The EIR states that the goal is to reduce the City's overall carbon dioxide footprint. But no calculation is provided comparing the GHG produced by the Project with the Projects mitigation measure. The result is that there is no calculation of the net GHG produced by this project as required by CEQA and SB32.

While the Climate Action Plan (CAP) of the City of San Diego represented a good step forward in controlling GHG, the City CAP has defects that do not enable the City to decrease GHG and to have a meaningful reduction of GHG.

In light of unresolved fundamental defects in the underlying modeling of the City's Climate Act (CAP) plan, Sierra Club is compelled to require the Carmel Mountain Ranch 1,200 home project to proceed with a standalone CAP, independent of the City's continued flawed emissions modeling. The widely reported defective assumptions, carried forward from 2010, are not only unchallenged by the city but readily agreed to, although dismissed as "Best Available Data" of GHG emissions. These faulty emissions falsely demonstrated that as early as November 2016 the City had reached reduction goals for 2020.

<https://www.sandiegouniontribune.com/opinion/editorials/story/2020-12-31/editorial-heres-glorias-first-misstep-as-mayor-using-bogus-data-for-greenhouse-emissions>

The findings have been uncontested by prior administrations in the city, but have been repeated by Todd Gloria, the current Mayor.

<https://www.sandiegouniontribune.com/news/environment/sd-me-climate-plan-report-20171025-story.html>

The data in the City of San Diego CAP cannot be trusted. As reiterated by the Union-Tribune, the City significantly overstates the 2010 base GHG generation during the "Great Recession," a period where the largest GHG contributor,

personal transportation precipitously declined due to the economic slowdown. Despite the GHG modeling being declared in the press as “bogus,” this version of the City’s defective modeling remains in place, signaling that San Diego is widely ahead of AB 32 and SB 32 requirements when in fact they are not.

This appendix to the 2017 Annual Report of the City of San Diego’s Climate Action Plan (CAP) is disturbing in what it offers:

https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf

The appendix provide four excuses that preclude consideration of the GHG modeling. The appendix also reveals that ARB guidance for determining per capita emissions cannot be utilized because San Diego’s emissions inventory fails to include all economic sectors and emission categories.

Sierra Club finds these flawed calculations both disturbing disingenuous, while allowing unbridled project approvals based on faulty GHG generation and a project “Checklist” untethered from GHG reality. Since this faulty checklist methodology is employed by the current Project the result is an invalid analysis not consistent with CEQA.

Recently the state of California has attempted to reduce vehicle miles travelled with the passage of SB743. But the Project is not compliant with 743; instead it creates large increases in VMT. The EIR reports, the “Project is not in a VMT efficient location per the VMT/Capita screening map.” Appendix G also states (page 3) that the Project is “112.6% to 122.1% of regional average VMT/Capita” for the city. This means that this Project is being built in a high VMT site. Appendix G of the EIR states that the impact to VMT are significant and unavoidable. “The expected Project VMT/Capita is 32-43% above the VMT significance threshold of 16.2. Since typical travel demand management measures can reduce VMT at most approximately 10-15%, the Project is expected to have a significant impact even with inclusion.”

Appendix G also states: “With mitigation, the Project will continue to have a significant and unavoidable VMT impact as explained in more detail below.” Even though some of the project is in a TPA the project would still generate large and unmitigable VMT contributing to substantial increases in GHG.

The VMT is characteristic of other sprawl projects. Appendix G reaches another important conclusion: “The census tracts containing the Project (170.56, 170.55, and 170.39) have VMT/Capita of 21.7, 21.4, and 23.2, respectively. These values are between 32-43% above the VMT significance threshold of 16.2. While modeling the Project in the SANDAG model would provide the Project specific estimate of VMT/Capita, it can be inferred from the land use characteristics of the surrounding census tracts and their VMT rates that it is extremely unlikely the Project would generate VMT/Capita of 15% below the regional average, even with TDM reductions. Accordingly, the Project would have a significant impact relative to VMT.” Thus, the Project would create VMT above the city average and a corresponding high level of GHG.

As a result the Project would dramatically increase VMT and GHG blowing up City and State climate action goals. GHG city targets in response to former Governor Arnold Schwarzenegger’s Executive Order S-3-05 established the 2050 statewide greenhouse gas (GHG) reduction target of 80 percent below 1990 levels. Governor Schwarzenegger also signed Assembly Bill 32 (AB 32) in 2006 which set a statewide reduction target of 1990 levels by 2020 and created a comprehensive, multi-year program to reduce GHG emissions in California. The Project is a direct threat to those goals.

The EIR states that: “Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below under the ‘petroleum’” subsection.”

The Project utilizes natural gas during operation, an outdated energy source which may soon be banned in California. The EIR states: “Natural gas consumption during operation of the project would be required for various purposes, including, but not limited to, cooking and building heating and cooling. The proposed project would consume approximately 86,416 therms per year. The Sierra Club believes that the project should be all electric, consistent with the best practices in home construction.

During construction of the project the EIR states: “The majority of fuel consumption resulting from the project’s operational phase would be attributable to employees, visitors, and residents traveling to and from the project site. Calculations for annual fuel consumption are provided in Table 5.5-6. Mobile sources from the proposed project would result in approximately 708,087 gallons

of gasoline per year and 49,504 gallons of diesel per year, for a total of 757,591 gallons of petroleum consumed per year beginning in 2026 after project buildout. It is forecasted that in 2026, approximately 1.4 billion gallons of petroleum in San Diego County will be consumed (CARB 2019).”

Like other project the Sierra Club recommends that the project be all electric, utilize solar energy on all roofs and parking structures, transit to transportation center must be provided and electric car charging stations should be in located in all parking areas.

The bottom line is this: the Project’s EIR is inconsistent with CEQA and other state GHG goals. The Project, even after mitigation, produces massive increases in GHG not consistent with State or National goal and should be rejected.

Reduced Air Quality

GHG that promotes climate change will result from this project but so will polluted air. The project also represents a major increase in air pollution and related health effects.

Unlike many construction projects the Project is surrounded by and immediately proximate to thousands of home. A large construction project within an existing neighborhood would produce abundant air pollution and dust.

Despite mitigation measures, fugitive dust from grading, hauling, conveying, and loading will occur. Fugitive dust is carcinogenic and is implicated in a host of respiratory problems including COPD, asthma, emphysema, lung cancer and premature death. Dust pollution would blow westward with the prevailing winds and pollute several communities of San Diego and the City of Poway. During Santa Ana winds dust would blow into Rancho Penasquitos and number of other San Diego communities,

In addition, fugitive dust in San Diego County can induce valley fever that is harmful and potentially deadly. Valley Fever is a serious and sometime fatal lung infection of the coccidioides fungi, which is often associated with grading and earthmoving. Some people experience a chronic cough; others can be stricken for years into such a limited capacity as to be bedridden by the infection. Deaths from coccidioidomycosis are not uncommon in high occurrence areas. There are three distinct stages of Valley Fever that manifest in patients; acute, chronic and

disseminated coccidioidomycosis, with those suffering from compromised immune at serious risk. The operation of a construction site completely surrounded by residents in an area where Valley Fever occurs increases the rate of exposure and threatens those frequently outdoors, including seniors and children.

The EIR states: “Development of the proposed project would generate air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, asphalt pavement application, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM10 and PM2.5 emissions. The proposed project would be subject to SDAPCD Rule 55, Fugitive Dust Control. This rule requires that the proposed project take steps to restrict visible emissions of fugitive dust...”

Amazingly the EIR reaches an erroneous conclusion: “Maximum daily overlap of construction and operation would not exceed the operational emissions threshold or the 100 pounds per day threshold of PM10. Impacts would be less than significant. No mitigation would be required”

Sierra Club strongly disputes this conclusion and maintains that the respiratory health of residents of Carmel Mountain Ranch would be seriously impaired by the Project.

Transportation and Traffic

The Project produces a large increase in traffic in North County San Diego and the EIR concludes that transportation impacts are **unmitigatable**. This is despite the fact that “**Portions** of the Project site are located within a Transit Priority Area (TPA) due to proximity to the Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit Station approximately 0.5 miles south of the Project Site.” Traffic is often stopped on area roads and Freeways, and this compounds an already serious problem.

Although a Transit Station is located near part of the project, it is important that not all of the project is in a Transit Priority Area. The “proposed project would result in an increase in density above what is currently zoned for the site. Because the proposed project would locate new residential units in close proximity “to the San Diego Metropolitan Transit System (MTS) Sabre Springs/Penasquitos Transit

Station (1,000 feet) and an access point for the Interstate-15 High Occupancy Vehicle (HOV) lanes (2,000 feet).” However, the bulk of the project is 1 ½ miles from the transit stop and parts of proposed project are nearly three miles away from the transit stop. The most distant residents in the project are 14,000 feet from the transit stop. So it is misleading to conclude that this large and disjointed project is fully within a Transit Priority Area.

The EIR provide an estimate of the distance from Transit Station to the Project. The closest distance from the Project to the Transit stop is measured from hole 4 which is native habitat, not development. According to the EIR only “A portion of the project site is located within the TPA Overlay Zone” Most of the project is not within a TPA, so they are not afforded the following density bonus. “The TPA portion of the site is located approximately 0.5 miles north of the Metropolitan Transit System Sabre Springs/Penasquitos Transit Station. The remaining lots and units are located outside the TPA Overlay Zone and Parking Standards TPA. However, per Ordinance Number 21057, if a portion of the project is within the TPA (i.e., holes 4, 5, and 6), the designation and associated parking reductions would apply to the entire project site.” Since hole four is not housing at all, the project miscalculates the distance which entitles it to a density bonus. The vast majority of the Project is not within walking distance of the Transit station which is why only two of the units of nine are close enough to use transit. As stated in Appendix G: “Additionally, for residents of Units 5 and 6, the Project will provide a 25% transit subsidy as an additional mitigation measure.” This is an admission that most of the project is not in a TPA. Construction far from a transit hub should not qualify for a density bonus.

Also, since few of the new residents of the Project are within walking distance of the Sabre Springs Transit Station, most will still drive cars, contributing to the considerable congestion that already exists in the Carmel Mountain Ranch area.

Additionally, the Transit Station has very few routes and is inadequate. Only three bus routes run out of the Transit Station. Route 235 runs from Escondido downtown. But the trip takes about 50-60 minutes from Sabre Springs to Downtown on this route depending on traffic. A car can often complete the trip in half that time. Route 290 runs from downtown San Diego to Rancho Bernardo Transit Station (Basically the same route as 235 but doesn't go as far north as

Escondido). It has similar show transit time, which is why most residents will opt to drive.

None of the transit lines go East/West to Sorrento Valley where many residents work. To get West one must take the 235 or 290 to Mira Mesa and then transfer to a slow bus that goes along Mira Mesa Blvd.

Route 944 runs from the Sabre Springs Transit Station to a small portion of Poway sites along Poway Road, ending near the Poway Walmart. This route could be useful for some shoppers but few commuters use this route.

The EIR is also deficient and misleading when it claims that 13,000 jobs are available in Poway. The EIR fails to indicate how many jobs are vacant in Poway. In conclusion the vast majority of residents will work in Sorrento Valley, downtown, UTC and will be driving. Accompanying VMT, GHG, and traffic will be the result. Until true rapid transit, twenty years from now, comes on line with the Five Big Moves, this will continue to be the case.

Cumulative Impacts

The Project does not exist in a vacuum. This is why CEQA requires a detailed analysis of the cumulative impacts of the Project and other projects or activities in the area.

The EIR does acknowledge that growth associated with project would result in “large and unavoidable increases to traffic circulation and population.” The EIR states: “Additionally, cumulative impacts associated with transportation/traffic circulation and population and housing would be significant and unavoidable.”

Traffic and VMT would be much worse in the area of the project. The EIR states “the project would be unable to reduce VMT impacts to a less than significant level, and the project’s contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant.” In addition the EIR states: “at the project-level, the project would be unable to reduce VMT impacts to a less than significant level, and the project’s contribution to traffic/VMT in the surrounding area, in addition to that of the projects listed in Table 6-1, would be cumulatively significant.”

This would lead to increased gridlock, more air pollution, more GHG and reduced quality of life for people living in Carmel Mountain Ranch. The substantial cumulative impact of the Project on air quality and climate change is, by itself, enough to reject this project.

Likewise, the EIR acknowledges that the Project produces large and unmitigable cumulative increases in crowding and population density, The EIR states: “the project would directly induce substantial unplanned population growth based on the currently adopted Housing Element (City of San Diego 2013). In conjunction with other residential developments proposed in the surrounding area, the proposed project could result in cumulative impacts to population and housing. Therefore, cumulative impacts to population and housing would be cumulatively significant and unavoidable.” Cramming 1200 housing units and over 3000 residents into the open space of a planned community is in violation of the community plan. Development in the area will result in environmental damage to almost every aspect of life in the Carmel Mountain Ranch community and surrounding area.

Lack of Meaningful CEQA Alternatives

The Project should be rejected because it fails to provide meaningful alternatives as required by CEQA. Aside from the “No Project/No Development Alternative”, which the Sierra Club supports, no meaningful alternative to the project is provided. The EIR understates the best alternative: “The No Project/No Development Alternative would have the fewest impacts.” In fact it would have NO environmental impacts.

The EIR provides a so-called Reduced Density Alternative that is not substantially different from the primary proposal. This Reduced Density alternative would have the same footprint of the proposed project, but the density would be reduced. This would reduce the number of multi-family homes proposed from 1,200 to 825 (353 4-story apartments, and 472 3-story for-sale townhomes). This alternative would also reduce the estimated number of people anticipated to occupy the new development from 3,180 people to 2,186.

The so-called Reduced Density Alternative is not a real alternative; it reduces the size of the project by only 31% and most of the problems that accrue from the 1200 home alternative and also present in the 825 home alternative. Indeed, the

EIR admits the impacts of the so-called Reduced Density Alternative would be slight. The EIR states: “The following issue areas that would be less than significant with or without mitigation under the proposed project, would be *slightly* [Ital. added] reduced under the Reduced Density Alternative: air quality, energy, greenhouse gas emissions, noise, transportation/circulation, public utilities, public services and facilities, population and housing, and visual effects and neighborhood character.”

The Reduced Footprint Alternative is not a meaningful alternative to the project either. In fact it actually increases environmental impacts in several ways. The Reduced Footprint Alternative increases the height of some building to be 4 to 6 stories in height (48 to 68 feet tall) increasing congestion and visual impacts. Importantly, none of the other environmental harms are reduced at all since the same number of people will be shoehorned into Carmel Mountain Ranch.

What the EIR does not consider is other alternatives including making this entire Project mitigation property for other city development, turning 100% of the former golf course into parkland, or allowing urban farming on some or all of the property as it is already zoned as agriculture

Unmitigated Impacts

Even so, the EIR concludes that there are significant and unmitigated impacts to Transportation, Population and Housing, and Public Services, and Facilitates. For several sections. Thus, the EIR concludes that a statement of overriding considerations is necessary for the city to ignore the considerable unmitigated impacts of the project.

The EIR concludes with the statement: “Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be to be significant and unmitigable identified in the EIR:

- Transportation/Circulation
- Public Services (Libraries)
- Population and Housing

Conclusion

The project should not be allowed to make statements of overriding consideration. Instead it should mitigate these deficiencies that the EIR concludes are unmitigatable.

The Sierra Club strongly urges the rejection of this project. We believe that a substantially downsized project (by 75%) or the no project alternative should be approved. As noted above the EIR is deficient in many respects and needs to be rewritten and recirculated.

Sierra Club opposes this project because it will cause substantial environmental damage. The Project will result in the destruction of community character, loss of open space and parkland, increased wildfire risk, elevated evacuation risk, creation of more sprawl housing, massive increases in greenhouse gas exacerbating climate change, reduced air quality, and more gridlocked traffic. Moreover the EIR lacks adequate CEQA alternatives, and admits to a number of unmitigatable environmental impacts. Sierra Club will seek all remedies in opposing this project.

Respectfully Yours,

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