

Trails at CMR EIR Concerns

Comment Ideas for Review of the Draft EIR for “The Trails at Carmel Mountain Ranch” Project

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Introduction and Background

About This document

This document is written to serve as a source of ideas, and not a cut-and-paste source of material.

When writing your review comments please remember that there can be multiple comments in a single letter, but each comment should stand alone so that it can be understood and responded to by the SD City staff.

Each comment should be specific about what the problem is, and should include at least a clear indication of where in the EIR document it refers to.

It is important to show why the EIR content (or lack) is a problem, and what sources are available to demonstrate that the comment has a basis in fact. It is acceptable to use personal experience as a basis but referring to an official document from the City or the developer is better.

Where to view the documents

The EIR and related document are available on the San Diego City web site

<https://www.sandiego.gov/ceqa/draft> - scroll down to find the "Search:" box. Enter the project number **652519** and click the Search button.

The Carmel Mountain Ranch Community Plan can be found on another San Diego City site:

https://www.sandiego.gov/sites/default/files/carmelmountainfinal_0.pdf

EIR Requirements and Subjects

Appendix A of the EIR contains the original *Scoping Letter and Notice of Preparation Comments*

The Scoping Letter is a Development Services Department summary of CEQA Environmental Impact Report requirements that must be met, and lists these major areas and subjects.

- Executive Summary
- Environmental Setting
- Project Description
- History of Project Changes
- Environmental Impact Analysis
 - Land Use
 - Transportation/Circulation
 - Air Quality
 - Biological Resources
 - Geologic Conditions
 - Greenhouse Gas Emissions
 - Health and Safety
 - Historical Resources
 - Hydrology
 - Noise
 - Paleontological Resources
 - Population and Housing
 - Public Services and Facilities
 - Public Utilities
 - Tribal Cultural Resources
 - Visual Effects and Neighborhood Character
 - Water Quality

- Wildfire
- Significant Environmental Effects Which Cannot be Avoided
- Significant Irreversible Environmental Changes
- Growth Inducement
- Cumulative Impacts
- Effects Found Not to be Significant
- Alternatives
 - No Project Alternative (Project not approved)
 - Other Project Alternatives (“reasonable” project alternatives)
- Mitigation Monitoring and Reporting Program
- References, Individuals and Agencies Consulted, Appendices
- Conclusion

Executive Summary

Project Does Not Meet Objective to Provide a Range of Housing Types

Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

~ The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to larger vehicle arterials and bus stops. . There is also substantial 60-100’ variable landscape buffer areas with grade separation between different developments for further neighborhood distinction and defense purposes.

~ NUW developer has not provided a precise site development plan showing building pads and roadways which does not allow for a thorough community and city analysis of the project overall. Analysis and interpretations by City and others may not be accurate.

~ The NUW developer was asked many times to provide similar type housing next to existing housing types so as to blend seamlessly with the CMR community. At the 18th community meeting NUW instead came back with 3-4 story apartment housing that fails to be anywhere near compatible with the adjacent established residential communities.

~ Developer was constantly asked but failed (so far) to consciously preserve the view corridors of existing homeowners throughout project, especially premium views at hilltops and upper areas (as designed for in original Community plan. A site plan in a traffic study by developer indicated walls of 3-4 story buildings along with a lack of grade separation that is not only inaccurate but unacceptable to the CMR community plan guidelines for development.

~ A red-lined markup of the developer's guidelines for the Trails and a position letter were provided by the CMRSS/CC CPG to the City of San Diego Planning Department and NUW, yet this information was not part of the EIR’s APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2). Also, no CMRSS/CC CPG meeting minutes references were found to be a part as well.

Proposed Multi-Family Multi-story Construction is Not Compatible With Existing Homes

Project Objective 1, Section ES.3 not met - as the range of housing types are not compatible with the adjacent established residential communities.

- The project is 100% multi-unit buildings, whereas Carmel Mountain Ranch has 47%. The Trails consist of 70% Apartments, Carmel Mountain Ranch has 24%. Carmel Mountain consists of about 52% single family homes, The Trails, 0 single family homes.
- The Trails at Carmel Mountain Ranch proposes building heights at 37' and 48' with minimum building setbacks at 50ft from the property lines of existing 2 story homes.

Page 83 of the Carmel Mountain Ranch Community Plan under Design Compatibility, paragraph 1, “the choice of building Heights will be geared to the silhouette of the terrain: higher buildings are planned on lower ground particularly within the Town Center area”.

Please see Figure 27 on page 84 of the Community Plan where apartment buildings are placed at lower elevations so as not to tower over single family homes. The apartments in Carmel Mountain Ranch are also built on the outer edges of the community, not in between rows of single family homes. Please see Google Maps for Carmel Terrace, Carmel Summit and Carmel Landing apartments: [Google Maps satellite view of Carmel Ridge Road](#)

The Trails will be an infill project with large multi-unit buildings 37' and 48' tall and 50' from existing 2 story homes. Height differences could be even greater depending on lot elevations.

In comparison, the 3 story Jefferson Apartments have at least a 100' separation from the condominiums at Windham and a 200' separation across the former fairway to the homes on Carmel Ridge Rd. Carmel Landing Apartments are a lower elevation to homes on the east and are separated by a 4 lane parkway (Rancho Carmel Drive) to the west. Homes in Carmel Mountain Ranch that have a 50-foot or less rear separation are of an equal height and type, single family home to single family home. Again, please see Google Maps above to confirm.

Project Does Not Meet Objective to Provide a Range of Housing Types

Project Objective 1, Section ES.3 not met - Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.

~ The majority of CMR are 2-story single family residential, especially on the upper hilltops and central core areas. The existing CMR Apartments or multi-family housing units were purposely planned and placed at the lower elevation areas and closer to larger vehicle arterials and bus stops.

~ NUW developer has not provided a precise site development plan showing building pads and roadways which does not allow for a thorough community and city analysis of the project overall. Analysis and interpretations by City and others may not be accurate.

~ The NUW developer was asked many times to provide similar type housing next to existing housing types so as to blend seamlessly with the CMR community. At the 18th community meeting NUW instead came back with 3-4 story apartment housing.

~ Developer was constantly asked but failed (so far) to consciously preserve the view corridors of existing homeowners throughout project, especially premium views at hilltops and upper areas (as designed for in original Community plan).

~ A red-lined markup of the developer's guidelines for the Trails and a position letter were provided by the CMRSS/CC CPG to the City of San Diego Planning Department and NUW, yet this information was not part of the

EIR's APPENDIX A - Scoping Letter and NOP Comments (Parts 1 and 2). Also, no CMRSS/CC CPG meeting minutes references were found to be a part as well.

Only 10% of Project Assists Any Disadvantaged Groups

Project Objective 2, Section ES.3 not met - Assist the City of San Diego (City) in meeting state and local housing goals by providing opportunities for high-quality, new, market-rate and deed-restricted housing to meet the needs of current and future City residents on vacant land centrally located near existing jobs, transit, commercial, and industrial development.

~ 85-90% of proposed development is on super hilly building pads with 273' feet of elevation change and over 1.5 miles from Sabre Springs Transit Center. This is not accessible for seniors or comply with ADA, which does not meet the TPA guidelines.

100-foot Buffers for Sensitive Areas Are Needed on All Project Perimeters

Project Objective 3, section ES.3 not met - Preserve the majority of the project site as open space, avoid areas of native vegetation or potentially suitable habitat for special-status plant species, and avoid areas of sensitive habitat including jurisdictional areas and their associated 100-foot buffers.

~ Proposed development should utilize those same 100' buffers for edge conditions adjacent to existing sensitive golf course homes. The 100' buffers with the trails are needed to provide for the health, safety, security, noise and privacy issues created by a 100% publicly accessed trail.

Permanent Irrigation Will Be Needed for Most or All Revegetated Areas

Project Objective 4, section ES.3 not met - The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought-tolerant, native landscaping.

~ The blighted look of the golf course was created by current ownership. The course was also relandscaped only a few years with native landscape but the temporary irrigation was turned off. Any new landscape buffers will need to be thoroughly planted with durable drought and native landscape (trees and shrubs) that requires a permanent (NOT TEMPORARY) irrigation system to keep all common and buffer areas alive and growing.

Golf Course Blight Should be Remedied by Current Owners

Project Objective 4, Section ES.3 not met - "The project would replace dead and dying vegetation associated with the vacant and blighted golf course with drought tolerant native Landscaping"

The blight on the golf course has been caused by the neglect of the current Golf Course owner who closed the golf course in 2018 and has failed to maintain it properly. There is currently a Golf Course Maintenance Program in effect. There are several ways the blight could be reversed instead of creating an infill project:

- The owner could Increase mowing and brush maintenance
- The owner could use the property for agricultural purposes, for example keeping the clubhouse open and converting the fairways to vineyards. See Monserate Winery, Fallbrook <http://monseratewinery.com/>

- The owner could sell the property under the AR 1 - 1 zoning

Public Recreational Area is Reduced, Easements show Trail-Side Amenities are Private

Project Objective 5, section ES.3 not met - Create a wide-range of active and passive public recreational opportunities above and beyond what is required by City regulations.

~ Actually, project is creating a net reduction in Parks and Open Space for CMR is being proposed as NUW is proposing developing over half of the 164-acre golf course (11 of 18 holes). Golf course is a recognized Parks and Recreational Open Space per the City's General plan. Project leaves a considerable amount of land unused, dormant and blighted with one of their proposed parks left for City to develop. This park location is very inaccessible via ADA or by any emergency or maintenance vehicles. (Unit 7)

~ Design guidelines suggest amenities may occur but do not seem to provide firm locations for them being proposed, such as: community gardens, vineyards, dog parks, fitness stations, interpretive signage, gathering areas, shaded seating, etc... (Public Easements are only proposed on the actual trails so any nearby amenities must be considered private and for development residents only.)

~ Community requested more parks and recreation areas due to uniqueness and amount of open space in CMR. These spaces should be developed recreationally such as additional playfields, playgrounds, passive park space, frisbee golf or skatepark.

Trails as Proposed Will Not Meet Proposed Uses and Will Create Other Problems

Project Objective 6, section ES.3 not met - Establish a multi-use trail system for pedestrians and bicyclists with connections to major amenities and adjacent neighborhoods. Establish a public system of trails and paths for community-wide use, thereby providing enhanced neighborhood connectivity.

~ A project called "The Trails" should set the bar high for trail-way development and accommodate many types of users such as walkers, hikers, joggers, runners, bird watchers, dog walkers, bikers and be ADA compliant.

~ Width of Trails is too narrow, not ADA compliant and create existing homeowner's safety, security, noise and privacy issues. Multi-use trails need to be at least 12 to 14 feet wide to accommodate two-way traffic and be a minimum of 50' from existing homeowner fences.

~ A multi-use trail requires planning for width, different durable surface types to eliminate erosion (concrete or asphalt), vertical clearance and trail amenities. Majority of development is on very hilly and sloping topography with elevation changes of over 270' with potential for erosion and excessive maintenance concerns. (CMR-RCA experience with DG trails shows significant erosion issues)

~ Benches, drinking fountains and shaded rest areas are valuable amenities to pedestrians. Where dogs are permitted, providing dog-friendly drinking fountains, bag dispensers and trash bins are necessary to encourage people to pick up after their dogs.

~ Amenities along the trails have not been specifically guaranteed for public use, so they must be assumed to be private for project residents only. The proposed Community Garden is only accessible on foot and from a steep trail leading from Unit 9 to Unit 17.

~ A very big issue is Over 650 homes along the golf course have 'open style' Wrought Iron fencing that was to provide an open space/view shed easement to the private golf course. If these trails are made for public access, they will create serious safety, security, privacy and noise issues. The backyards of these homes will be exposed and create opportunities for predators and burglars which needs to be mitigated by developer.

Project Building Types and Setbacks Make it Incompatible with Existing Community

Project Objective 7, section ES.3 not met - Ensure new uses are compatible with the existing community by establishing 50-foot setbacks, design regulations and guidelines, best practices, and performance standards to ensure that the project is cohesive and respectful of existing properties.

~ Proposed housing types not compatible with existing per Community Plan. Need 2-story single family housing types at upper elevation and core areas of existing CMR development to create appropriate and compatible densities. 3-4 story apartments should match style and locations as per CMR plan with 75-100' landscape buffers.

~ Buffer zones need to 75'-100' so first 50' buffer can be 100% landscape and a 12' wide community trail can occur afterwards. No vehicular or roadway deviations to be allowed within first 50' of buffer so as to provide for existing homeowner's safety, security, noise and privacy issues.

~ Imagery, sections and drawings provided in guidelines are template and not of actual conditions.

~ Need actual to-scale sections in guidelines so can be reviewed accurately

Proposed Project is Not Cohesive or Respectful of the Existing Community

Project Objective 7, section ES.3 not met - The Trails at Carmel Mountain is not cohesive nor respectful of existing properties

- The project is not cohesive in that it infills former golf fairways spread throughout the Carmel Mountain Ranch Community.
- It is not cohesive in that the density and type of housing will stand out instead of blending in with the community.(please see the response to Objective #1)
- The project is not respectful of existing properties as it is 100% multi-unit buildings, the buildings are all three and four stories tall, the building setbacks are only 50' and there is only a minimum 15' landscape buffer with driveways and parking allowed just a 30' distance from existing homes. Please see page 9 of the Design Guidelines for density and heights of the proposed buildings and page 14, Transitions, Buffers, Edges and Screening for buffers and circulation elements. In addition, the EIR alternatives create possibility that apartments could be even taller (5-6 story) in Unit 9, which would require additional mitigative efforts.

Rules for Project Alternatives Evaluation Send Mixed Messages

Section ES.8 Project Alternatives ~ As mentioned initially in this document, this EIR is an informational document that is intended for use by City decision-makers and members of the general public in evaluating the potential environmental effects of the project. This project is a very controversial development that is disrupting the lives of a well-established community of over 15,000 residents and businesses by one owner. They are attempting to profit by an attempt to rezone their existing property that will allow an outrageous change in population that will change the culture and value of the existing development forever. It seems somewhat confusing that the selection of alternatives chosen in this EIR is governed by a so-called "rule of reason" (required to evaluate only those alternatives necessary to permit a reasoned choice). It would seem more appropriate and fairer that one of the alternatives should be sought that mitigates the impacts and reaches out to blend better with the community plan and existing development. This is especially true since the focus of this analysis is to determine 3 items (1) whether the alternatives are capable of avoiding or substantially lessening the significant environmental effects of the project, (2) the feasibility of the alternatives, and (3) whether the alternatives meet all or most of the basic project objectives.

Reduced Density Alternative Should Be Much Smaller

Section ES.8.2 Reduced Density Alternative This 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.

~ 825 units are not much of a reduction. Why not reduce to 250 or 300 units and do an alternative analysis for that and reduce the number of impacts being made.

~ Also 2.65 people per unit seems light. The trends these days are more like 3-4/ unit as families combine resources. So, it is likely that there are more like 3600-4000 residents being proposed. Either way, a 30% plus increase in population is very drastic and plopping all of it into 50 acres (7% of total CMR property) would be irresponsible planning-wise and change the VMTs and other significant numbers even more dramatically.

Land Use

Project Site Has Low Village Propensity vs. CMR Plaza and Residential Area

Per San Diego General Plan Land Use and Community Planning Element: (EIR Pg. 112) - "According to Figure LU-1 of the Land Use and Community Planning Element, the project site itself has low Village Propensity, however the area immediately to the north (residential and Carmel Mountain Plaza) is considered to have higher Village Propensity." This supports the notation that mixed-use development of the CMR Shopping Centers would be more beneficial to the community than the proposed project.

Project EIR Omits Walkability from City of Villages Compliance Evaluation

Table 5.1-2 (EIR Pg. 126) - Project's Consistency with City of San Diego's General Plan : The project is not compatible with the City of Villages Strategy

Per the EIR, "A. **City of Villages Strategy.** "Mixed-use villages located throughout the City and connected by high-quality transit. "

The EIR omitted the term **walkable villages**. Per pg. ME-5 of the Mobility Element of the City of San Diego's General Plan, ..." The strategy calls for redevelopment, infill, and new growth to be targeted into compact, mixed-use, and **walkable villages** that are connected to the regional transit system."

Pg. ME-6 of the Mobility Element of the General Plan under goals says:

A. Walkable Communities Goals "A city where walking is a viable travel choice, **particularly for trips of less than one-half mile.**"

- Carmel Mountain Ranch is not a compact, walkable community. The Community Plan for Carmel Mountain Ranch was approved in 1984, 18 years before the City of Villages Strategy Was approved by the city council. The Transit Center was added to the southwest corner of Carmel Mountain Ranch in 2014 and is 1.4 miles (and a 130 foot climb) away from the community Town Center.
- The city of villages concept calls for compact, mixed-use, and **walkable villages** that are connected to the regional transit system. .
- The trails project wishes to infill the former golf course whose fairways were spread throughout the community. Only a small portion of the proposed development is within a half-mile of the transit center, approximately 276 units. Unit 16 is about 2 miles walking distance from the Transit Center and 0.4 mi from Ralphs. Units 9 and 10, with a projected 500 residents, are on average 1.5 miles from the Transit Center and 1 mile to Ralphs, exceeding the ½ mile walkable goal in the City's Mobility Element. (using the clubhouse, 14050 Carmel Ridge Rd and 12001 Ferncrest for averages).
- Beyond the distances are the extreme elevation differences between most of the new units and either the Shopping Center or the Transit Center. Further, the topography, street layout, and locations of Trail points of connection to existing streets force walking paths to traverse steep (up to 10% slopes) grades to move around the CMR community. See [Appendix A, Carmel Mountain Ranch Elevation Maps](#) for detailed support

Project EIR Misleads in Its Walkability City of Villages Compliance Evaluation

Table 5.1.2 (Pg. 143) Project's Consistency with City of San Diego's General Plan

Mobility Element A) Walkable Community Goals:

"A city where walking is a viable travel choice, particularly for trips of less than one-half mile."

"A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities."

- The Project's analysis of walkable community goals is inadequate because it does not include distance and topography information. In most cases distances are too great and hills are too steep for casual walks to the store.
- The "Trails" being described as connecting the community are trapped by existing houses and in only a few cases actually save time or energy over walking existing sidewalks.
- The safety of the paths may become a concern as casual bicycle riders find them too steep and mountain bike riders find them challenging and thrilling for the same reasons. With widths varying from 5 to 10 feet, and some parts surfaced with Decomposed Granite walkers may find it uncomfortable to share them with bicycles passing at substantial speeds.
- The issue is the same with regards to walking distances to Transit Center and Shopping. Most of the project is greater than ½ mile to either the Transit Center or Shopping. The former golf cart trails meander thru the community and connect the former fairways to each other. They are surrounded by existing homes and accessible to residents of The Trails. Existing residents would have to access the trails where they exit onto the sidewalk.

Project Does Not Meet SD General Plan Urban Design Goals for Use of Open Space

The important locations of the open space parcels being developed will change the look and feel of the community. The project is NOT consistent with policies UD-A.1 and UD-A.2.

Urban Design Element Policy UD-A.1 (Table 5.1.2 (EIR Pg. 159) Project's Consistency with City of San Diego's General Plan) Part a. "Protect the integrity of community plan designated open spaces"

- Carmel Mountain Ranch was designed with the golf course land counting as part of the community's Open Space and per the Community Plan, "as a physical and visual amenity that will link the natural and physical features of the community into a coherent whole"

Urban Design Element Policy UD-A.2 "Use open space and landscape to define and link communities."

- The Trails at CMR takes away the very concept that Carmel Mountain Ranch was built upon, using open space of the golf course to define and link the community. Boundary planting, even with a pathway cannot mitigate the placement of apartment and condominium complexes along with their connecting roads, parking lots, and refuse enclosures in the most central area of more than half of the former fairways.

Project Designs are NOT Sensitive to the Well-established Character of CMR

Pg 164 **Urban Design Element Policy UD-A.5** (Table 5.1.2 (EIR Pg. 164)) Part b. "Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character."

- The Trails at CMR project is not coherent with the existing development due to scale and density . Current apartment buildings are located on stepped hillsides away from single-family homes. When nearby, they are built on pads that are below those homes.
- Proposed buildings will in most cases be built on ground that is roughly level with adjacent homes, making it impossible to still consider Carmel Mountain Ranch a golf-course community as it was designed to be. Filling prime open space parcels with 3 and 4 story buildings will forever remove the feel of peacefulness that open green spaces bring.

Project Consistency with Urban Design Element of SD City General Plan

Table 5 1.2 "Project's Consistency with City of San Diego's General Plan" Part B Distinctive Neighborhoods and Residential Design Goals,

(EIR Pg. 171) Goal/Recommendation: "Infill housing, roadways and new construction that are **sensitive to the character and quality of existing neighborhoods.**"

- No mention was made in that section of the table where consideration was given to the existing residential neighborhood. A 15' landscape buffer, circulation elements at 30' and 50' building setback for 3-4 story multi family buildings are not sensitive to the existing 2 story single family homes.

Pg. 173 Policy UD-B.1 "a. **Integrate new construction with the existing fabric and scale** of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, **new development should not cast shadows or create wind tunnels that will significantly impact existing** development and should not restrict vehicular or pedestrian movements from existing development."

- The Trails project does not match the scale of existing development as most of it will be adjacent to 2 story single family homes.

Pg. 174 Policy UD-B.2 “c. Provide transitions of scale between higher-density development and lower density neighborhoods.”

- It is not apparent The Trails has any transitions of scale between higher and lower density development.

Pg. 174/5 Policy UD-B.3 “Design subdivisions to respect the existing lot pattern established within neighborhoods to maintain community character.”

a. Create lot divisions that respect the existing pattern of development for neighborhood continuity and compatibility.

-The Trails project is not compatible with the existing community character. The Trails wish to Infill the former golf course with 3-4 story multifamily buildings surrounded by existing 2 story single family homes

[A Foundation for Mixed-Use Development Already Exists in CMR Retail Centers](#)

The City’s climate action plan requires less dependence of automobile transportation. The City of Villages concept should be instituted in walkable communities. The Trails project does not meet the criteria due to the steep hills, distances to shopping, and lack access to public transportation outside of the Ted Williams/I-15 interchange. Walkable developments in CMR would be next to or part of the Retail Centers. The “neighborhoods” described in the Trails literature are normally referred to as apartment or condominium complexes. They are definitely not villages due to lack of services.

Existing infrastructure would allow affordable units to be constructed. Four stories above retail or parking lots can be done and would create a walkable community where a car is not required. Availability of grocery, hardware, wholesale, restaurants, entertainment, pharmacy and libraries can eliminate the need for a car. Units can be constructed which time-share parking spaces with businesses, and transit options via enhanced bus service would makes sense because of the increased number of possible riders. Proximity to the Retail Centers and Office/Tech/Light Industrial businesses offers a wide range of employment opportunities.

[Transportation](#)

[VMT Mitigations Using Bicycles on Trails Ignore Shortcomings](#)

The mitigation option regarding VMT impact on transportation and circulation may not be effective in the location. On table 5.2.2 outline two measures of mitigation. An onsite bicycle repair station and 600 short-term bicycle parking spaces – There are multiple problems with this mitigation measure. The former golf course was constructed on steep hillsides making bicycle travel a challenging exercise for all but the fittest of riders. Additionally, the project's trails are only 5-8 feet wide. Portions are to be constructed of decomposed granite.

- The Trails are likely not ADA compliant.
- The gravel paths add difficulty to riding up the very steep hills.

- People riding down the hills may be traveling at a high rate of speed making it dangerous for people walking.

VMT Analysis Does Not Properly Reflect Increased Greenhouse Gas Emissions

Vehicle Miles Traveled and Greenhouse Gas Emissions. One reason VMT analysis was adopted in SB 743 was to promote public health through a reduction in greenhouse gas emissions. Obviously adding 8,282 average daily trips to this small community is not going to promote public health through a reduction of greenhouse gas emissions. The VMT figures provided bear this out: "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." Appendix G, Vehicle Miles Traveled Analysis, pdf page 12. These results are dramatically contrary to the City's Climate Action Plan goal of reducing greenhouse gas emissions. City of San Diego Climate Action Plan, Adopted Dec 2015, Chap. 2, Reducing Emissions. The Draft EIR and supporting Appendices are deficient in that the specific greenhouse gas emissions to be caused by the abnormal VMT levels do not appear to be quantified, and therefore the environmental impact is not appropriately analyzed. In fact, the Draft EIR, Section 5.7, Greenhouse Gas Emission, does not analyze the specific greenhouse gas emissions to be caused by the abnormal VMT levels.

Bicycle-Use Based VMT Mitigations Not Shown to be Applicable to CMR

The Developer should receive no VMT mitigation credit for bicycles, bicycle racks, and/or bicycle repair stations. The VMT mitigation effort of bicycle racks and repair stations (Draft EIR Section 5.2, pdf page 250, Table 5.2, has no factual basis in CMR. CMR is not a bicycle community, because, among other reasons, it is too hilly. Appendix C, the Local Mobility Analysis, sec.10, pdf page 85 and Figures 17a and b, shows only one intersection having High Activity of more than 10 cyclists in the AM and PM peak hours. That intersection is Ted Williams Parkway/Pomerado Road, which is not even in CMR or the City of San Diego, but in Poway, and likely few of the cyclists are CMR residents. The rest of the intersections in Figure 17 are either Medium Activity (5 intersections with 5-10 cyclists) or Low Activity (17 intersections with less than 5 cyclists) in the AM and PM peak hours. These are paltry numbers for a community of 13,287. Lacking a factual basis, the developer should receive no mitigation credit for bicycle racks or repair stations. Regarding an on-site shared bicycle fleet of 150 bicycles, Appendix G, Vehicle Miles Traveled Analysis, pdf page 14, the developer has not stated in the Draft EIR or elsewhere that it would provide these bicycles, and in any event given the low numbers of cyclists, there is no data to indicate these bicycles would actually be used in significant numbers.

Local Mobility Analysis and EIR Do Not Include Project Impacts on I-15 and SR-56

The Draft EIR and the Local Mobility Analysis (App. C) are deficient because they do not present or analyze the impact of increased traffic on relevant Interstate 15 and SR-56 segments. Interstate 15 is completely built out in this area and there is no publicly known funded or scheduled upgrade to SR-56, so the impacts of increased traffic on an already overburdened I-15 and SR-56 are critical. Some of the critical segments are I-15 Northbound from Poway Road to SR-56; I-15 Northbound from SR-56 to Carmel Mountain Road; I-15 Northbound from Carmel Mountain Road to Camino Del Norte; I-15 Southbound from Camino Del Norte to Carmel Mountain Road; I-15 Southbound from Carmel Mountain Road to SR-56; I-15 Southbound from SR-56 to Poway Road; SR-56 Eastbound from Rancho Penasquitos Boulevard to I-15; and SR-56 Westbound from I-15 to Rancho Penasquitos Boulevard. The Local Mobility Analysis at pdf pages 47-70, and the entire Draft EIR does not even mention the traffic and circulation impact of 8,282 ADTs on these critical segments, and the Draft EIR is therefore deficient.

Transit Priority Area Designation Is Misleading Due to the Limited Routes

The TPA criteria are met technically but practically. Only proposed Units 5 and 6 are within walking distance of the Sabre Springs/Peñasquitos Transit Station, and bus route support is limited to the Downtown San Diego employment area. There are no known future Light Rail connections planned, and the station was constructed to be a drive-to park and ride for downtown workers (where it is successful). However buses are not provided to the Sorrento Mesa and Sorrento Valley areas where high tech and bio tech jobs exist.

Greenhouse Gas Emissions

Unmitigated Greenhouse Gas Emissions Violate City and State Climate Action Plans

Greenhouse Gas Emissions, will be excessive due to the project exceeding Vehicle Miles Traveled guidelines established by the State of California. The City of San Diego has adopted its own climate action plan. Leaders will need to violate both City and State guidelines to initiate the Trails at CMR development. Global warming is a scientific fact. Nations are around the world now realize the we must make significant changes to prevent catastrophe. Continue to build in area that are car dependent is no longer an option. The new development, must change and become environmental responsible.

Visual Effects/Neighborhood Character

Grading Plans Are Not Consistent with Community Plan and Trails Design Guidelines

Grading, land locked, health hazard, not consistent with community plan. The CMR Community plans was designed to have all dwelling units follow the topography of the hillsides. The Trails propose to do massive amounts of grading to level hillsides to create large level pads. The plan calls for placing all buildings on one level pad. There are multiple problems with the strategy beyond community character. Large grading projects are rarely done in so close to existing houses. In many cases the units/holes are completely landlocked. The giant machinery working in the planned community will create fugitive dust from excavation that can cause emphysema, Valley fever and exacerbate COVID lung problems. To solve the problems associated with grading the project should not allow leveling of hillsides. Each building should follow the CMR Community plan by having each new building to be constructed on its own level pad. Phasing should be limited to a period of no more than two years of construction.

Health and Safety

Existing Conditions Impacts on Health and Safety

5.8.1 Physical Conditions: Analysis of issues in and around the property:

Note that the former golf course used various chemicals, herbicides, pesticides, petroleum products. **The EIR does not indicate that soil tests were done at the maintenance area and spot checked at each fairway.** Any residual contamination would create a risk of fugitive dust during grading and other phases of construction.

Pg. 404 states:

“... a single 500-gallon **underground storage tank** (UST) containing gasoline, which was installed in 1989 and removed in 1993,”no detections were reported in soil samples collected beneath the UST and analyzed for total petroleum hydrocarbons”

“... as well as the handling and storage of **lead-acid batteries** at the project site in 2017”

“... The Carmel Mountain Ranch Country Club listing refers to the handling and disposal of 1.0425 tons of “unspecified oil-containing waste” in 1998” “likely in reference to the grease trap and two stage clarifier observed during their site visit.”

“... One additional soil sample was also analyzed for TPH; volatile organic compounds (VOCs); benzene, toluene, ethylbenzene, and xylenes (BTEX); and total recoverable petroleum hydrocarbons (TRPH). **Minor detections of 1,1-dichloroethene (DCE) at 1.2 milligrams per kilogram (mg/kg) and toluene at 4.1 mg/kg were reported.** The DEH Site Assessment and Mitigation (SAM) Program reviewed the soil analytical results and determined that no further action was required.”

“Further, the phase I ESA noted the presence of a two-stage clarifier on the project site, located to the east of the clubhouse, related to the former electric golf cart wash area. Although there are no reported issues or violations associated with the clarifier, **the existing clarifier could result in soil contamination at the project site.**”

The EIR does not explain what steps were taken to ensure public safety. Specifically if the soil been tested or not? If not why what was the reason to believe there would not be a risk of dust contamination during construction?

[Pesticide Contamination Risk](#)

Pg. 405 states: “a recognized environmental condition (REC)...”

“The ongoing pesticide application on the site leading to accumulated residual pesticides in soils would be considered a REC.”

Again, the EIR fails to state if each fairway spot was checked for chemical residue in the soil (to what depth?) for herbicides, pesticides etc? These will become airborne during excavation and grading and there did not appear to be a reference to this possibility in the Air Quality Section.

[Safety and Privacy Issues Caused by Opening Trails to Public Access](#)

Safety and privacy problems are caused by opening the trail system in the development. Currently, the closed golf course is separated from single family homes by a bar style slotted metal fence. The purpose of the fence was to provide views to the golf course. Once complete the trail system will be open to the public. These fences will allow views into the golf course frontage homes at night. As a private area that has not been a concern for residents. Once open the public it provides a perfect opportunity for criminals to observe residents, track their patterns and rob their homes. New fencing must be provided by the developer to protect homeowners.

[Underpass Tunnels Will Likely Present Serious Safety Issues](#)

It is likely that even during daylight hours these tunnels will prove to be an attractive nuisance. That is, they may attract the homeless as they have done even when the golf course was operational. The possible risks for pedestrians and casual bicycle riders is certainly much different from what it was for golfers in relatively fast-moving electric golf carts. During course operation the CMR Country Club staff regularly traveled the entire course and there were posted no trespassing signs. As a public walkway it will be much less regulated, and lighting alone will certainly not ensure a safe and clean environment.

Public Safety Issues Presented by Tunnels Are Not Addressed

When evaluating the Project's Consistency with City of San Diego's General Plan (Table 5.1.2 (EIR Pg. 170) **Urban Design Element Policy UD-A.17. the Safety of the Tunnels is not addressed. The General Plan**

Goal/Recommendation is: "Incorporate crime prevention through environmental design measures, as necessary, to reduce incidences of fear and crime, and design safer environments."

- a. Design projects to encourage visible space and "eyes on the street" security that will serve as a means to discourage and deter crime through the location of physical features, activities, and people to maximize visibility.

The analysis for this section does not address the safety impact of the 5 pedestrian tunnels.

The developer wishes to use the golf cart tunnels as pedestrian tunnels for The Trails project. When the golf course was in operation, the tunnels were only used by golf course patrons and maintenance personnel in golf carts. The entire golf course and tunnels were patrolled daily by golf course maintenance personnel with a drive-through being conducted before it's nightly closure. It is assumed no such oversight will be implemented for the Trails at CMR.

Keeping the golf cart tunnels open and used by pedestrians exposes users to the potential of physical harm.

1. Pedestrians will be out of the public view while walking down large embankments as the sidewalk lowers in elevation to allow access under the roads. The tunnels are not short well-lit pathways, they are actual tunnels with fully-enclosed areas as long as 185 feet passing under Ted Williams Parkway, others are 130 to 150 feet long.
2. Having large parts of the walkway out of view from the public can encourage antisocial behavior such as littering, graffiti, drinking or drug use, loitering and crime.
3. Litter and nuisance issues could evolve from people that are homeless attempting to use the tunnels as temporary or permanent shelters.
4. Pedestrians could be robbed or physically or sexually assaulted during their descent into and through the tunnels.
5. The organization taking responsibility for the ownership and maintenance of the tunnels could be exposed to lawsuits for encouraging the public to use a facilities that increase their potential for harm.

To mitigate this hazard a suggestion would be to infill the tunnels and access sidewalks with excavation dirt to grade level and then landscape with native plants. The trail connectivity would not be affected by infilling the tunnels as 4 out of the 5 tunnels are at intersections controlled by traffic lights. Sidewalk "go arounds" can easily be constructed from the trails to the traffic light controlled pedestrian crossings. The fifth tunnel connecting units 5 and 6, can also be infilled the trail appears to go along the southern border of unit 5 and exits onto the sidewalk on Rancho Carmel Drive about 100 feet north of the signalized intersection of Provencal Place in Rancho Carmel Drive.

Infilling tunnels and subterranean spaces is not uncommon. There are companies specifically geared to infilling small areas such as former swimming pools to large industrial projects that have been abandoned thus reducing the public's exposure to danger and the owner to liability.

Biological Resources

Project Consistency with Conservation Element of SD City General Plan

Pg. 210 G. Biological Diversity: The developer says, “**The project would retain the majority of the 164.5- acre project site as open space.** Specifically, open space uses would be composed of approximately 111.27 acres.”

- The community would lose over 50 acres of Open Space they have enjoyed and was planned as an integral part of the community.
- Wildlife that has moved un-hindered through the property would now be forced into narrow corridors which will change the dynamics of species interactions. In many locations only the 15 foot width of the 50-foot buffer zone will actually be free from paved encroachments, as compared with 150 to 300 foot planted widths previously.

Historical Resources

Trails Project Does Not Maintain Character & Identity of CMR

The San Diego General Plan Historic Preservation Element, (EIR Pg. 116) - “encourage appreciation for the City's history and culture, maintain the character and identity of communities,..” **The project does not maintain the character of Carmel Mountain Ranch** due to density and scale.

Population and Housing

Affordable Housing Will Not Offer Ownership Opportunities

Will the development result in affordable housing? Some limited deed restricted but vast majority will not be affordable and most will be rental. Housing projects should be affordable and offer opportunity for purchase instead of rental.

EIR Incorrectly Minimizes the Impacts of the Project Building Heights

Section 5.1.3 Impacts Analysis, Issue 2:Impact of deviations: (EIR Pg. 121)

EIR analysis incorrectly states “In the instances where maximum building height is greater than 40 feet, it is likely that differences in grade and topography would not result in a substantial visible difference between existing and proposed development. Similarly, variations in lot area, setback, width, depth, and frontage would not result in development that is substantially visibly different from the surrounding community”

- **The project would be substantially different than existing community.** Based on elevations shown in the Vesting Tentative Map set, most of the graded building pads are close in elevation to adjacent existing homes. The golf course is surrounded by 2 story single family homes whereas The Trails are 100% multi-family units, 3-4 stories in height with greater heights and densities than the surrounding existing development.

The EIR also states “Further, per California Public Resources Code Section 20199 (d)(1), aesthetic impacts resulting from a residential project on an infill site within a Transit Priority Area are not considered significant” and incorrectly concludes that “As deviations requested would not affect any other environmental issue or sensitive resource, it would not result in a physical impact on the environment.” This is wrong because:

- Impact of the requested deviations encompass more than aesthetic issues. While aesthetics addresses whether a project is "liked" from a design standpoint, the height, bulk, and locations of some projects would impact adjoining homes in several other ways: Increased heat-trapping by replacing large areas of grass, dirt, and plants with concrete, stucco, and asphalt; disruption of cooling wind patterns, especially by unit 9, which would sit at the highest point of CMR, and block prevailing west wind which currently cools homes directly to the east of that site. Street traffic along Carmel Ridge Road will be substantially increased by residents of units 9 and 10, while the buildings of unit 9 will reflect that noise back towards the homes on the east side of the street.

Addition of 1,200 New Housing Units Substantially Impacts the Community

- EIR Section ES.3 Objective 1: “Provide multi-family housing units with a range of housing types that are compatible with the adjacent established residential communities.”
- CEQA states that development must not violate the character of the general plan.

The local residential communities as evidenced by the CMR community plan are as follows:

1. Population The 5,039 residential units are estimated to generate a population of approximately 12,000 persons. This number was projected from SANDAG’s population figures extracted from the federal 1990 census data. An average of 2.35 persons are anticipated for each dwelling unit within Carmel Mountain Ranch.

2. Community Balance A balanced community encompasses a variety of housing types related to acreage/density numbers. A wide range of densities with creative site planning will provide a broad economic offering within the community. The extent to which this will achieve the goals of City Council Policy 600-19 will be dependent upon final approval of densities and housing types. To meet the City’s proposed mobile home enabling legislation, 108 mobile home units have been incorporated into the Plan. This housing falls in the category of low-medium density at 7.6 units per acre. It will respond to a demand for affordable housing.

RECREATION AND OPEN SPACE

(Table 3, CMR Community Plan Updated 9/29/2020)

	Unit Number	Gross Acres	Net Acres	Percent of Total Community Acres
Public Parks				1.7%
Neighborhood	55	4.8	4.0	
Community	50	18.3	13.0	
Pool	52	2.4	2.4	
Private Recreation	33	2.3		0.2%

SDG&E Easement		34.0		2.3%
Golf Course & Driving Range	60A, 60B		175.0	11.8%
Natural Open Space	61	101.3		6.8%
Major Open Space		12.5		0.8%
Slopes				
Totals		348.5	19.4	23.6%

Presently the community is made up on the following housing types:

(Table 2, CMR Community Plan Updated 9/29/2020)

Low-Density	0-5 DU/GA	559	11%
Mobile Homes	6-8 DU/GA	108	2%
Low-Medium Density	6-29 DU/GA	3,059	60%
Medium-Density	30-43 DU/GA	1,263	26%
Very High Density	75-109 DU/GA	50	1%
Total Dwelling Units		5,039	100%

The subtraction of the 175 acres of the former golf course to be replaced by 1,200 multi-family units changes the dynamics of the community.

- The addition of 1,200 multi-family unit doubles the number of medium density units. Therefore, the project does not meet one of its specific objectives. It seeks to disrupt the balance of housing types.
- Length of phasing could result in noise, pollution, construction for a very long timeframe from 5-10 years. The grading equipment will damage the environment, roads, noise to a community of 12,000 people.
- Open space lost, community is under parked, 9 new acres of parks with no space for organized sports such as ball fields, pickle ball, basketball for 3,000 new residents. The community had too few parks before the development based on City guidelines. When the community was built, an exception was made to the large open space provided by the golf course. Remember, we are not adding open space in the area we are only facing a net loss. In our case 11 of the former 18 holes are to be developed resulting in a net loss of open space of 61%.
- Topography was to be preserved as part of the Community Plan; view corridors are protected by constructing buildings that follow the counter of the hillsides. The Community Plan in the Parks and Open Space element speaks of the following: Incorporation of the golf course, as a visual and physical amenity, which will link the natural and physical features of the community into a coherent whole, linkage of open space and public parks into a continuous network of bike paths and pedestrian trails where it can be done in a manner sensitive to the topography and landforms traversed, retention of open space acreage for views easements, noise buffers or preservation of natural, irreplaceable environments. The Trails at CMR devastates the Community plan, the topography, the open space and the community character as protected by CEQA.

- AR1-1 is the zoning according to the community plan but in the SD General plan it is identified as Parks and Recreation. City's Climate Action plan requires additional park and recreation spaces. The City should not allow destruction of Park and Recreation space. There are many opportunities to add affordable housing without destroying park and recreation space. We should look to retail shopping existing retail shopping centers that will continue to see vacancies due to the explosion of online shopping and the closure of brick and mortar retail.
- Library impact, offering a community pottery art building is inadequate we need to more library space. The offering of an arts center in exchange for massive environmental damage.
- The concept of calculating open space is flawed. Project is 167 acres. Developer calculates that they will construct buildings on 51 acres. They state that 2/3rds of the property will remain open space. That statement is misleading. In fact they only count building footprints as development. They plan to construct many, many buildings on 11 of the 18 holes. We contend that each hole that is built upon should remove that hole from consideration of open space. If that were the case the calculation of lost open space is 61%. Further each hole/unit will have many many buildings. An example would be unit 6. The plan is to construct 78 apartments on 2.3 acres of the 7 available acres. If they were to build 10 buildings, 48 feet high spread across the 7 acres how can they contend that 5 acres of open space is left? In reality, the seven acre unit will be entirely covered with buildings, roads, parking.

Wildfire

Fire Evacuation Analysis Does Not Fully Reflect Project Impacts

The Draft EIR's treatment of fire evacuation ignores historical data. The Draft EIR's treatment of the fire evacuation issue is deficient because it ignores likely available historical data on actual fire evacuation times, particularly during extreme conditions of high wind-driven flaming embers. Nowhere in the basic treatment of fire evacuation re the community itself (pdf page 603, 5.19 Wildfire; PDF pages 613-18, 5.19.3 Impacts Analysis. Issues 1-3), or considered with cumulative impacts of adjacent communities (PDF page 637, 6.1.19 Wildfire) are evacuation times even mentioned. Appendix D, Fire Fuel Load Modeling Report, is similarly deficient. The Draft EIR does acknowledge that "Typically, the highest fire danger is produced by the high-pressure systems that occur in the Great Basin which result in the Santa Ana winds of Southern California. Sustained wind speeds recorded during recent major fires in San Diego County exceeded 30 mph and may exceed 50 mph during extreme conditions." The Draft EIR does not specifically spell out the grave danger posed by high wind-driven flaming embers, the mass evacuation orders that these conditions engender, and the resulting clogged evacuation routes. There are recent high wind-driven ember fires, with mass evacuations ordered, and clogged evacuation routes. This data must be presented and considered along with the additional impact of 3,180 additional residents and their vehicles. It is not enough to simply state, as the Draft EIR does, that the San Diego County Emergency Operations Plan (EOP) (Sept 2018) (Annex Q, Evacuation) will not be impaired (pdf page 613-4), or that "For emergency evacuation, the EOP identifies I-15 and SR-56 as emergency evacuation routes in the vicinity of the project site. Portions of the project site are located adjacent to I-15 to the east and to the northeast of SR-56. Per the VMT Analysis (Appendix G to this EIR), the proposed project is anticipated to add 7,928 average daily trips to and from the project site." (pdf p 613), without further data or analysis. The County EOP in fact in Annex Q, Evacuation, p. 16, provides a formula for determining evacuation times. The recent high wind-driven ember fires and CMR evacuation issues should have been studied and should have produced data available to the City and developer. The Draft EIR needs to get this data or produce it if it has not been compiled, and add the additional impact of 3,180 additional residents and their vehicles to determine the true threat to the community of this massive project.

Project Alternatives

Project Alternatives Should Include a Low-Unit-Count Option

Four Project Options, 1,200 units, 825 Units, Change of Footprint, No Project – The 1,200 and 825 unit and Change in footprint options result in a significant unmitigable impact on transportation/circulation, public service, and population and housing. Suggest that there be an additional option where the significant impacts can be mitigated. A 250 unit option would likely result in a good compromise.

Project Reduced Density Option Draws Invalid Conclusion

Reduced Density option comes to the conclusion that since the 825 unit option would not solve the significant and unavoidable impacts it makes sense to not consider this option due to the “slight” reduction in reduced population, housing and traffic and transportation impacts. That conclusion is faulty. In fact, the reduced option would reduce the population from 3,180 people to 2,186. That represents a 31.4% reduction. By any measure that should not be considered slight. Further if the 825 unit option does not improve impacts would it not make more sense to evaluate options somewhere between 0 and 825 units?

Mixed-Use Development in Shopping Centers Is Not Addressed as an Alternative

There are alternatives for housing in areas that are already developed for commercial use. Due to factors such as online shopping, increasing COVID-caused work-from-home impacts, and higher vacancies in retail and office space there are increasing opportunities for mixed-use developments.

