



Sierra Club San Diego Chapter
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Dear Ms Roady and Ms Stevens,

Sierra Club San Diego has considerable concerns about the adverse environmental impacts of the Ivanhoe Ranch Project. It is hard to imagine that this project can be approved given its location and substantial adverse impacts to the environment. Accordingly we request, consistent with the notice of preparation, a detailed EIR be produced that includes the following analyses of the environmental impacts.

Use as a mitigation property

It appears that the ideal use of the property would be a preserved open space in accordance with the need for avoided conversion of open space as part of the county mitigation program. Please include in the EIR 1) A no project alternative, 2) a reduced project alternative, and 3) the conversion of this parcel to county mitigation property for other less environmentally damaging construction project.

Loss of Open space

The proposed Ivanhoe Ranch project convert the general plan land use designation from Open space (Recreation) and semi-rural to a single family residential project. According to the notice of preparation: the "Project requires a General Plan Amendment and a Rezone to change the land use designation and zoning as proposed. Therefore, the Project could result in a conflict with a land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect. An analysis will be prepared and discussed within the context of the DEIR to determine if any Project conflicts could potentially result in significant environmental impacts"

Sierra Club strongly opposes the loss of any land designated open space and recreational to the development of single family homes. New development should maximize infill close to the urban core, jobs, and transit, not take valuable and diminishing open space. Please provide and analysis in the EIR of 1) a better, less environmentally damaging alternative to the proposed project, and 2) an open space and wildlife mitigation program elsewhere in San Diego County to mitigate the harms of this project on at least a 2 to 1 basis.

Additionally the NOP states, "These areas are almost completely developed with large scale, residential and commercial developments interspersed with large areas of green-belt open space and biological open space needed for wildlife preservation." Please provide a detailed plan for the protection and/or mitigation of these green belt, open space, and wildlife corridors.

MSCP taking

The project site is also within the South County Multiple Species Conservation Program (MSCP) area. The NOP states: "Approximately 36 acres of the 121.9-acre project site are designated in the South County MSCP as Pre-Approved Mitigation Areas (PAMA). Sensitive or special status species occur or have the potential to occur within the project site. Therefore, the Project has the potential to directly and indirectly impact candidate, sensitive, and/or special status species. A biological resources analysis will be prepared and discussed within the context of the DEIR to analyze potential impacts to candidate, sensitive or special status species." Additionally the NOP states: "The Project has the potential to impact native resident or migratory wildlife corridors." Please provide a detailed plan for the protection and mitigation of the native residents or wildlife corridors.

The NOP states: "Portions of the project site are located within a Very High Fire Hazard Severity Zone (FHSZ) as defined by the California Department of Forestry and Fire Protection (CAL FIRE). Development of 119 single-family homes and associated infrastructure would create an increase in demand for fire protection and emergency services due to increased activity, proximity of housing to preserved vegetation fuel on the site, and a greater number of ignition sources on the site, including equipment and human activities. The potential for the Project to impair implementation of or physically interfere with these plans will be analyzed in the DEIR."

Given the county's position, how can this be justified? How can the project legally justify the taking of MSCP land that should be protected in perpetuity? The EIR needs to detail the environmental and legal basis for taking of MSCP land.

Williamson Act Cancellation

Of particular concern is the cancellation of a Williamson Act Contract designed to preserve open space. Under a Williamson Act Contract the landowner is afforded substantially reduced property tax assessments. Article 13 of the California Constitution declares the interest of the state in preserving open-space land and provides a constitutional basis for valuing property according to its actual use. The amendment had originated with groups interested in the

preservation of open-space land. The Act declares that in a rapidly urbanizing society, agricultural lands have a definite public value as open space, and the preservation in agricultural production of such lands constitutes an important physical, social, esthetic, and economic asset to existing or pending urban or metropolitan developments. In the EIR please justify conversion of a Williamson Act Contract and the financial compensation to the State of California and the County of San Diego for the prior lost state revenues based on this conversion of the open space and prior tax affordances under the Williamson Act.

Visual Aesthetics.

The NOP states: "Because the Project would introduce development, it has the potential to result in significant impacts to scenic vistas. Therefore, a visual analysis will be prepared and discussed within the context of the Draft Environmental Impact Report (DEIR) to analyze potential impacts to scenic vistas." The NOP also states that "The Open Space and Conservation Element of the County's General Plan identifies the County Scenic Highway System. The project site is located approximately 0.25 mile from Willow Glen Drive, a County scenic roadway listed in Table COS-1, County Scenic Highway System of the Open Space and Conservation Element of the County's General Plan." Please justify a development along a county scenic highway and the difficulty in mitigating such a loss.

Impacts on the McGinty Mountain Federal Wildlife Preserve.

The NOP erroneously states: "The project site is currently undeveloped and surrounded by vacant uses to the north and northeast." The property to the North and East is the large and valuable McGinty Mountain Federal Wildlife Preserve and it is far from vacant. It is a treasure of protection for endangered plants and animals.

The NOP states: "Further, the Project's landscaping would potentially use commercially available fertilizers, pesticides, and other regulated materials commonly used in agricultural operations. *Although use of these chemicals is generally common for residential uses, they could result in significant hazard to the public or the environment if not stored or disposed of correctly.*" In the EIR please carefully assess the impact of the chemical on all of the protected flora and Fauna in this Federal Wildlife Preserve. Additionally, please assess in EIR other impact of the project on the McGinty Mountain Federal Wildlife Preserve.

Somehow the NOP fails to mention herbicides, particularly glyphosate, and exactly the brand name Roundup™, the most notorious chemical on the planet, which Bayer recently paid out \$10 billion+ for related deaths and cancers. The County of San Diego Department of Weights and Measures is currently testing glyphosate impacts based on use of highly regulated commercial agriculture utilizing licensed and professional applicators. Any such agricultural comparison must define "***and other regulated materials commonly used in agricultural operations***" which are also "generally common" to residential customers. Just who will be responsible to inspect, correct or prohibit homeowner practices which "***could result in***

significant hazard to the public or the environment”? Is it the County, the developer, the HOA, or the homeowner? The NOP fails to provide assurances, recommendations, or mitigation of any kind. The statement is completely hollow in reference to ***“if not stored or disposed of correctly.”*** as the application process has the highest record and potential for errors and environmental damages.

Sprawl-no transit

The NOP fails to mention accessibility to transit. In the EIR please provide a detailed analysis of

- 1) proximity, accessibility, and feasibility of using transit to various location in San Diego county.
- 2) Please provide a detailed analysis of the percent of residents likely to use transit versus automobiles.
- 3) Please provide a detailed account of the Vehicle Miles Travelled for the residents travelling by car.

No affordable housing

California and the County of San Diego requires that new developments provide at least 15% affordable housing for new developments but the NOP provide no information about affordable housing. Please include in the EIR a detailed plan for price restricted affordable housing in the project.

Wildfire Risk

According to maps of the County of San Diego much of the proposed Ivanhoe Ranch Project sits in a “very high” wildfire zone. Its close proximity to the adjacent McGinty Mountain Ecological Reserve puts it at additional risk. McGinty Mountain has not burned since 1971 and there is abundant fuel on the mountain for a massive wildfire. McGinty Mountain is located to the east of the project where the predominantly east-wind driven Santa Anna wind would quickly engulf the proposed Ivanhoe Ranch Project. The NOP states that, “Portions of the project site are located within a Very High Fire Hazard Severity Zone (FHSZ) as defined by the California Department of Forestry and Fire Protection (CAL FIRE). Development of 119 single-family homes and associated infrastructure would create an increase in demand for fire protection and emergency services due to increased activity, proximity of housing to preserved vegetation fuel on the site, and a greater number of ignition sources on the site, including equipment and human activities. The potential for the Project to impair implementation of or physically interfere with these plans will be analyzed in the DEIR. The EIR needs to analyze carefully the advisability of this project and recommend if it should be built at all in light of the extreme fire risk.

There needs to be a viable wildfire evacuation plan that does not trap and kill residents. The NOP states: “the Project could substantially impair an adopted emergency response plan or emergency evacuation plan during a fire. A Fire Protection Plan analysis will be prepared and discussed in the context of the DEIR to determine the Project’s potential to substantially impair an adopted emergency response or evacuation plan.” There are no viable evacuation plans for

this area. Nearby 91935 zip code is in one of the highest 2% fire evacuation risk zones in the state. Please provide in the EIR a comprehensive evacuation plan that indicate whether or not it is possible to evacuate not only resident of the Ivanhoe Ranch project but tens of thousands of existing residents in Rancho San Diego, Jamul, Dehesa, Crest, and other nearby communities that would be stranded on the same roads during a wildfire evacuation.

Sand Mine Impact

The EIR must recognize that a large proposed sand mine may soon replace the Cottonwood Golf Club. The NOP is out of date when it states, "The project site is bounded by Ivanhoe Ranch Road and the Cottonwood Golf Club to the west and the Steele Canyon residential development to the south." Later it states: "The Cottonwood Golf Club, a public, 18-hole golf course located off Willow Glen Drive, borders the western project boundary." The Golf Course no longer exists; it is just open space that may become a sand mine.

The EIR need to examine the cumulative impact of a large sand mine immediately adjacent to the Ivanhoe Ranch Project and if this project is safe, healthy, or even feasible since it will be located downwind from a huge sand mine with accompanying health impacts of asthma, hearing damage, exposure to deadly silicosis and Valley Fever (coccidioidomycosis) and life threatening fungal infections. **Cumulative impacts**

The NOP states, "Potentially significant cumulative effects could occur related to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, GHGs, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Noise, Land Use Planning, Population and Housing, Public Services, and Recreation..." In addition to the Sand mine the cumulative effects of nearby projects, including but not limited to, Otay Village 14, The Jamul Casino, the Sycuan Casino, and other developments that impact congestion, noise, traffic, and air quality.

Air Pollution

San Diego County has the 5th worst air quality in the nation. Nonetheless that NOP concludes: "Therefore, the Project may contribute to a cumulatively considerable net increase of criteria pollutants for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard." Additionally, the NOP states: "The Project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during the construction and operation phases of the Project. Because the amount of energy anticipated to be used during construction and operation of the Project is not known at this time, the Project could have a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. An analysis of the Project's energy consumption will be prepared and discussed within the context of the DEIR." The EIR needs to carefully document the increased air pollution from Ivanhoe Ranch from construction, operation, and vehicle operation as a result of the project. If there is any excess air pollution the EIR must

document the amount of pollution and how this is to be mitigated within the county of San Diego.

GHG

Similarly, the NOP states that: "The Project would generate GHG emissions from area sources, energy demand (electricity and natural gas), water consumption, solid waste handling, motor vehicle trips, and construction and land use change activities. A Greenhouse Gas analysis will be prepared and discussed within the context of the DEIR to quantify and analyze any potential conflicts with any applicable plan, policy, or regulation for the purpose of reducing the emissions of GHG emissions." The EIR needs to explain how most of the GHG would be limited through the use of solar panels, prohibition of gas powered maintenance equipment, elimination of natural gas and propane to heat, cool, or for water heaters. After all these and other measure any net increase in GHG must be mitigated within the county of San Diego on a 2 to 1 basis. The EIR should lay out such plans in detail.

Respectfully Yours,

Dr. Peter A. Andersen, Vice-Chairperson
Conservation Committee
Sierra Club San Diego

George Courser, Chairperson
Conservation Committee
Sierra Club San Diego