

LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018
(STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT REVISED EIR PUBLIC REVIEW PERIOD
June 12, 2014 through July 28, 2014

DRAFT EIR COMMENT SHEET

Tuesday, June 17, 2014
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

The terrain of Valley Center is such that high density housing of the type in this proposal is extremely dangerous with respect to fire risk and the ability of citizens to escape. This proposal is unacceptable. Please describe how those living & working in this development are going to safely evacuate the area.

(Attach additional pages as needed)

Lawrence M. Gartner 6/29/14
Signature Date

Lawrence M. Gartner, M.D.
Print Name

28398 Alamar Rd
Address

Valley Center, CA 92082
City State Zip Code

760-751-9479
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 28, 2014

Via Email

July 27, 2014

Mark Slovick, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Mark.Slovick@sdcounty.ca.gov
[\(858\) 495-5172](tel:(858)495-5172)

Subject: Revised DEIR Public Comments regarding the **May 2014 Lilac Hills Ranch Fire Service Response Capabilities Assessment (DUDEK Report)** with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

The following are my Public Comments pertaining to the June 2014 Revised Draft Environmental Impact Report ("REIR") regarding the DUDEK report as noted above.

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in this letter and any Attachments.

Please respond to each specific issue raised in this letter as part of the County's Response to Public Comments.

.

Sincerely,



James E. Gordon
9733 Adams Ct.
Escondido, CA 92026
Jegordon888@gmail.com

**REIR PUBLIC COMMENTS TO THE DUDEK AND HUNT RESEARCH CORP.
MAY 2014 LILAC HILLS RANCH FIRE SERVICE RESPONSE CAPABILITIES ASSESSMENT**

Comments to Page V of the Report

The first paragraph on page V references comments made by CAL FIRE, DSFPD and the San Diego County Fire Authority (SDCFA) upon the initial submittal of the project's Fire Protection Plan prepared by Firewise2000 **"that seemed to indicate that the project could not be adequately serviced by the DSFPD and CAL FIRE, as currently configured."**

Please provide all emails and documents to/from or between the State Fire Marshal, the SDCFA and the County as to the ability and willingness of CAL FIRE to service this project. A comprehensive understanding of the ability and willingness of these parties to service the project is important in evaluating the ability of the project to meet General Plan (GP) mandated response times under the four fire service alternatives proposed by DUDEK in this report.

Comments to Paragraph #7 on Page VII of the Report

Paragraph #7 on page VII states: (1) that a total of 85% of Phase 1 of the LHR project can be reached within 5 minutes and 50 seconds and (2) that **"UP TO 70%"** (emphasis added) of Phase 2 can be reached within 6 minutes. Please be specific as to the exact number of the 352 dwelling units in Phase 1 can be reached in 5 minutes and 50 seconds and also the exact number of the 466 dwelling units in Phase 2 can be reached within 6 minutes.

Comments to Paragraph # 4 Page IX of the Report

According to the DUDEK report, "Board Policy 1-84 (Public Facilities Availability Form) requires response times to be calculated in accordance with the standard established by General Plan Policy S-6.4"

According to DUDEK, GP Policy S-6.4 provides that travel times be calculated from: (1) the closest fire station staffed year-round; (2) publically supported; and (3) committed to providing services. DUDEK states that "Station 15 meets this definition."

HOWEVER, the VERY NEXT SENTENCE in GP Policy S-6.4 states with emphasis added: **"THESE DO NO INCLUDE STATIONS THAT ARE NOT OBLIGATED BY LAW TO AUTOMATICALLY RESPOND TO AN INCIDENT."** DUDEK did not discuss this key 4th element mandated by the General Plan.

There are four elements in General Plan Policy S-6.4 pertaining to travel times: (1) fire stations staffed year round; (2) publically supported; (3) committed to providing service and (4) **they MUST BE OBLIGATED BY LAW TO RESPOND.**

In more than ten thousand pages of this REIR and supporting documents, appendices and technical reports, **this KEY 4th element of the GP Policy S-6.4 has not been discussed.** This is a significant issue that impacts the project as well as all alternatives discussed.

Please discuss in detail whether CAL FIRE Miller Station 15 meets all 4 elements of GP Policy S-6.4 pertaining to travel times.

Comments to Paragraph #15 on Page IX of the Report

DUDEK states that the current agreement between DSFPD and CAL FIRE can be used to allow CAL FIRE to serve the project from Station 15 provided **“assurances that the PRC requirements are preserved.”** (Emphasis added).

Please discuss what assurances are necessary; from whom those assurances need to be obtained; the manner in which those assurances will be obtained; and how you guarantee that those assurances will be in effect 12-15 years from now when the project is entering full build-out.

Comments to Option 1 on Page XI of the DUDEK Report

This option is based on providing services to the LHR project from the perspective of the overall fire delivery system under the existing Amador Agreement. **The Amador Agreement is a service option under a voluntary agreement between CAL FIRE and the County of San Diego which expires on June 30, 2018.**

Please discuss in detail the impacts to the LHR project if the terms of the Service Option (Amador Agreement) are changed and/or if the agreement is canceled either by CAL FIRE or the County. Section 8 of the agreement states that the agreement may be cancelled at the option of either CAL FIRE or County at any time during its term, with or without cause.

Please discuss in detail how fire and emergency services to the project would be impacted if this agreement is not in force at the time of full project build-out.

Please discuss in detail the significant impacts to the LHR Project that could result from basing fire and emergency response times on voluntary agreements that may not be in force at project build-out.

Comments to Page 27 of the DUDEK Report

DUDEK states that **“CAL FIRE has an obligation to automatically respond to fire incidents pursuant to the Automatic Aid Agreement”** (emphasis added) and “Therefore, Station 15 is the actual closest fire station and it meets all the criteria of a “station” from which to calculate such travel times from as set forth in General Plan Policy S-6.4.”

The key wording with emphasis added of the 4th element in General Plan Policy S-6.4 pertaining to the definition of closest fire station is: **“Does not include stations that are not obligated by law to automatically respond.”**

DUDEK states (with emphasis added): **“Therefore, Station 15 is the actual closest fire station and meets all of the criteria of a “station” from which to calculate such travel times from as set forth in General Plan Policy S-6.4.”**

There is no discussion in the DUDEK report pertaining to whether CAL FIRE Miller Station 15 is obligated by law to automatically respond to an incident. Please discuss in detail how DUDEK concludes that the CAL FIRE Miller Station 15 meets all of the criteria of a station from which to calculate travel times as set forth in General Plan Policy S-6.4.

If CAL FIRE is obligated by law to respond and therefore is the “closest fire station,” that should be easy to confirm with CAL FIRE and they can provide confirmation. Has CAL FIRE been contacted on this issue? If so, what questions were asked and what was their response? Has CAL FIRE confirmed that it is the “closest fire station” under Section S-6.4. If so, that should be included in the report. If CAL FIRE does not deem itself the “closest fire station,” that should also be included in the report.

The following is a cut and paste from Section S-6.4 of the County General Plan:

According to the General Plan - Fire Protection Services for Development require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station). *Travel times are calculated using accepted methodology based on the travel distance from the fire station to the farthest dwelling unit of the development. Fire stations must be staffed year-round, publicly supported, and committed to providing service. **These do not include stations that are not obligated by law to automatically respond to an incident.*** (Emphasis added).

The REIR needs to be revised and updated pertaining to any discussion related to the “closest fire station.” The four elements of General Plan Section S-6.4 are the County’s requirements. The requirements must be disclosed, discussed and met. Only three of the four elements for determining the Closest Fire Station were discussed.

Comments to Page 38 of the DUDEK Report

The last paragraph on page 38 of the DUDEK report states “If CAL FIRE was to enter into a new agreement or amend (sic) its existing contract with the DSFPD, certain findings would need to be made or reaffirmed.”

Please discuss in detail all findings that would need to be made or reaffirmed as well as all possible impacts to the LHR with respect to emergency response times.

The next sentence states: “The preparers of this report have reviewed PRC 4141 through 4145 and have spoken with CAL FIRE concerning interpretation of the Code and conclude that Station 15 would be able to continue its primary wildland fire mission while also serving the project.” (Emphasis added).

Please discuss in detail who was contacted at CAL FIRE pertaining to the interpretation of the Code and summarize the information provided.

Comments to Figure A-4 Pertaining to Deer Springs Fire Station 15

This figure could be misinterpreted as it is titled **“DSFPD Station 15 Coverage Area – 4, 5, and 8 Minute Travel Time”** and shows the coverage area for **Deer Springs Fire Station 15**.

There is no Deer Springs Fire Station 15. The CAL FIRE Miller Station 15 is not under the control or authority of the DSFPD nor part of the Fire Authority Having Jurisdiction.

As this is a stand-alone figure, if this figure were to be used in public meetings or with public officials, it would indicate that this is the travel response time from DSFPD Station 15. Also the footers on all these Figures states that the figure is part of the **“Deer Springs Fire Protection District Capabilities Assessment”** -- further implying that this is the response times for the DSFPD.

All references to Deer Springs Fire Station 15, DSFPD 15 or Station 15 should be clarified to avoid misinterpretation. Also, all figures for the Deer Springs Fire Protection District Capabilities must clarify that CAL FIRE Miller 15 Station is not part of the DSFPD.

Comments to Page 57 of the DUDEK Report

As discussed previously on page 2, DUDEK stated that **“up to 70%”** of Phase 2 units could be reached in under 6 minutes travel time. Now, DUDEK states: **“it is estimated that roughly 60-70% of Phase 2 units could be reached in under 6 minutes travel time.”** [Emphasis added]

Phase 2 is 466 homes. Please specify the exact number of Phase 2 homes that can be reached in under 6 minute travel time from Station 11. Terms such as **“it is estimated,”** **“roughly”** and **“up to”** are not quantifiable and can be subject to misinterpretation. Detailed modeling has been conducted and the number should be specific.

Comments to Decommissioning of CAL FIRE Station 15 on page 65

This section needs to discuss the impact to the LHR project, if as stated in the DUDEK report, **“Station 15 were to be decommissioned or were otherwise not available to respond to emergency call with the DSFPD.”**

Saying **“that the impact on the remaining three Stations within the District would be primarily slower response times”** does not adequately address the impact to the LHR community.

The core focus of the DUDEK report is: (1) the willingness and ability of CAL FIRE Miller Station 15 to commit to service the LHR project in 5 minutes; (2) that CAL FIRE should assume primary (and possibly full) responsibility for fire and emergency response to the Lilac Hills Ranch Project; and that (3) CAL FIRE is willing to permanently commit to assuming responsibility for the LHR project.

SUMMARY

Section S-6.4, **Fire Protection Services for Development** requires *“that new development demonstrative the fire services can be provided that meets the minimum travel times identified in Table S-1 - Travel Time Standards from Closest Fire Station.”*

Further the section states: (a) *“Travel Times are calculated using accepted methodology based on the travel distance from the fire station to the farthest dwelling unit of the development;”* (b) *“Fire Stations must be staffed year-round, publically supported, and committed to providing service;”* and (c) ***These do not include stations that are not obligated by law to automatically respond to an incident.*** (Emphasis added)

The failure to include a discussion about the 4th key element as required by the General Plan is a significant impact; the failure to discuss whether or not CAL FIRE Miller Station 15 is obligated by law to respond to an incident is a terminal impact.

This report must be revised and recirculated for public review. The Fire Protection Plan that relies on the findings and information from the DUDEK report must be revised and recirculated for public review. The LHR Evacuation Plan, which relies on information and finding from the DUDEK report must be revised and recirculated for public review. The County’s sections in the REIR that rely on findings and information from the DUDEK report must be revised and recirculated for public review.

The impact from not discussing the key 4th element of calculating fire and emergency response times is significant not only to the LHR project, but has far broader significant political and economic impacts.

This is a project of over 1,700 homes, more than 5,000 residents, a thousand senior citizens, hundreds of patients in an intuitional setting and substantially more than \$500,000,000 million worth of private property.

The County Board of Supervisors can use their Legislative power to allow this project to proceed even though it does not comply with the General Plan. However, the ramifications of doing so without full knowledge of all the key facts could be problematic.

If the County uses its Legislative power it is a de facto change in policy. It in effect changes the policy of San Diego County by mandating that the obligation of fire stations to respond to an incident is **based on their geographical location as opposed to the Fire Authority Having Jurisdiction.**

Such an action could ultimately lead to a jurisdictional issues, unintended litigation, and operational issues between CAL FIRE and the local districts and city fire departments within the County.

Although the Board of Supervisors has the authority, it should not proceed without a clear understanding of the issues and input from State, County, City and Local Fire Districts. Unfortunately, the State, County, City and Local Fire Districts **cannot comment on something that has NOT been discussed.**

Via Email

July 21, 2014

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Subject: Public Comments to Chapter 4.0 - **FIGURE 4-17 – MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE- MOUNTAIN RIDGE ROAD GRADING PLAN** of the Project Alternatives section of the REIR with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

The following are my Public Comments pertaining to the June 2014 Revised Draft Environmental Impact Report ("REIR") regarding FIGURE 4-17 – MOUNTAIN ROAD FIRE STATION ALTERNATIVE- MOUNTAIN RIDGE ROAD GRADING PLAN.

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in this letter and any Attachments.

Please respond to each specific issue raised in this letter as part of the County's Response to Public Comments.

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Sincerely,

A handwritten signature in black ink, appearing to read "James E. Gordon". The signature is fluid and cursive, with a long horizontal stroke at the end.

James E. Gordon
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COMMENTS TO FIGURE 4-17 – MOUNTAIN ROAD FIRE STATION ALTERNATIVE-
MOUNTAIN RIDGE ROAD GRADING PLAN (OPTION 1) OF CHAPTER 4.0 (PROJECT
ALTERNATIVES) OF THE REVISED DRAFT ENVIRONMENTAL IMPACT REPORT

COMMENTS:

Figure 4-17 of the Mountain Ridge Road Fire Station Alternative is insufficient to provide the information necessary to determine the impact and feasibility of this option as the accompanying report and Figures do not address significant impacts.

The current Figure and summary provided is deficient in multiple ways as discussed below. As an example, the elevation map for the road does not provide any details on the impact and required construction easements necessary for Megan Terrace, Adams Ct, Elmond Drive and an unnamed road located on the west side of Mountain Ridge, just south of Adams Ct.

The grading plan needs to provide details as to what sections of the road will be worked on during each phase of road construction so that the significance of the impacts can be evaluated. Additionally, only the "limits of disturbance" required for slope easements are shown. **HOWEVER** the areas that will be impacted for construction activities, grading, equipment staging, worker parking, interim relocation of egress/ingress roads and utilities **are not shown**. Also not shown are the designs details including grading alignment for the temporary ingress and egress roads that will be required. Please provide specific details for each of these issues, including plans, figures and summary Tables. It is impossible to determine impacts and their significance or discuss mitigation efforts and their effectiveness without this basic and key information.

According to Recon's May 16th Mountain Ridge Road Noise Analysis report, Recon (page 12) has the detailed plans with proposed roadway elevations, including the proposed grading contours and lane locations for construction of Mountain Ridge Road Public. The County also has these plans. These plans are critical to evaluate the full and significant impacts of the Mountain Ridge Road Fire Station Alternative. Please provide a copy of all the plans.

Also, as discussed by Recon on page 7 of their May 16th report, a typical daily work area for this construction project would be encompass work on 5 acres and have an average linear working distance of 300 feet. Thus to stay consistent with Recon's methodology, please break down each phase of construction into 5 acre phases showing 300 linear feet of construction for the requests and comments below.

Also, please provide details as to the amount of cubic yards of fill will be required for grading and how many cubic yards of cut will be done. How many cubic yards of fill will be imported or exported for the construction of Mountain Ridge Road Public project.

PLEASE PROVIDE DETAILS, INCLUDING LARGE SCALE DRAWINGS AND DETAILED PHASED CONCEPTUAL PLANS THAT ADDRESSES THE FOLLOWING: ALSO THESE REQUESTS AND COMMENTS PERTAIN TO THE BASELINE ROAD AS IT EXISTS TODAY AS WELL AS THE ROAD PROPOSED IN THE PROJECT.

1. Detailed plans by phase of construction for maintaining utilities for the residents of Mountain Ridge including electricity, telephone, domestic water and fire water. Will the impacted residents be without telephone, power, domestic water or fire water for any part of the construction? If use, please describe in detail the impact and mitigation proposed.
2. Detailed plans by phase of construction for where fire hydrants will be relocated during construction that meets the current level of service and County requirements.
3. Detailed plans by phase of construction for maintaining 24/7 ingress and egress to the residents of Mountain Ridge Road, including residents of Megan Terrace, Adams Ct, Elmond Drive, and the unnamed street mentioned above as well as maintain access to all residents whose driveways abut Mountain Ridge Road.
4. Detailed plans by phase of construction for the design, location and construction specifics for any temporary roads that will be required. Also include a summary of all rights of way or temporary easements that will be required for construction of the temporary roads and what rights the County has or alternatively what rights the County/Developer will require and how it plans to obtain those rights.
5. Detailed plans by phase of construction to maintain internal traffic and pedestrian flow within the Circle R Estates HOA that will allow free and unobstructed traffic and pedestrian flow between the HOA residents located on Megan Terrace and their family and friends on Adams Ct.
6. A detailed Fire and Life Safety Access plan for Mountain Ridge road during each phase of construction. The project requires fill of 20 feet above existing grade in a number of locations which is a major undertaking. In addition to the grading and construction equipment that will be located on Mountain Ridge Road, the project will require more than 12,000 10 wheel truck 6 c.u. loads of fill to be brought in.
7. Please detail where the fill will be imported from and the impact and safety factors to the Circle R Road Community as well as Mountain Ridge road of 12,000 truckloads (each of which can weigh 15,000 to 25,000 pounds) of fill being imported over a short time period. Also please provide similar information for the amount of asphalt that will be brought in.
8. Please provide a safety plan for pedestrians and bicyclists for Mountain Ridge Road as well that portion of Circle R Drive that construction trucks and trucks carrying imported fill will be using.
9. Please provide a fire, health and safety plan for the storage of hazardous materials. What hazardous materials will be stored or used, in what quantities, at what locations along Mountain Ridge Road, Megan Terrace, Adams Ct or Elmond Drive. Please provide a detailed Hazmat and Emergency Response/Evacuation Plan. Also please discuss in detail the potential impacts to the Mountain Ridge Road Community, including a discussion on the health effects, from each and every hazardous material that will be used or stored within the Mountain Ridge Road Alternative Construction area. Also, please provide a plan for responding to spills, including community notification as well as the process for reporting to regulatory authorities.

10. Please provide a plan to maintain 24/7/365 access to all homes along Mountain Ridge including Elmond Drive, Megan Terrace, Adams Ct for fire, ambulance, police and other emergency vehicles. If 24/7/365 access cannot be provided, please discuss in detail the impact to the neighborhood and its residents.
11. Please provide a fire evacuation plan for the community discussing what evacuation routes to take so they can safely evacuate their homes in case of a wild land fire during the construction of Mountain Ridge Public Road.
12. Please provide details and a plan by construction phase of the storm water protection plan. A detailed storm water drainage flow map is critical as Mountain Ridge Road has two areas that flow into tributaries of the United States. Mountain Ridge Creek, located on the northern boundary of the existing paved road (southern portion of the project site) flows into a tributaries of the United States. Also, the Mountain Ridge wetlands, located on the West Side of Mountain Ride (in the areas opposite Megan Terrace) flows into Mountain Ridge Creek and into the tributaries of the United States. Please provide copies of all maps and plans that will be required for review by the United States Army Corp of Engineers. This is critical as the project will produce a significant amount of pollutants as well as silt and other contaminants that will result in possible pollution to the tributaries of United States waterways.
13. Please provide a specific plan for grading, including watering, that will address the fact that this work will be conducted in an existing community. As an example, how often will all grading areas be watered down and will that water be potable water. How often construction areas will be watered down. What additional dust control steps will be taken and what will the impact of dust be to the neighborhood. The majority of the residents of Mountain Ridge live on the east side of the road which is always the downwind side. As the topography of the road is known, how will the topography of the road and the prevailing winds effect the impact of noise, dust and pollutants on the residents.
14. Please provide detailed security plan for the impacted residents for physical and property security during construction.
15. What are the plans for dealing with special needs children living in the impacted area?
16. What are the plans for dealing with frail and elderly residents living in the impacted area?
17. Please show by the phase of construction all physical areas on and surrounding Mountain Ridge road that will be impacted and disturbed during the construction period and delineate the type of impact and the areas of impact. The current "limits of disturbance" and "limits of grading" shown are misleading as they imply that the areas shown are the full area of impact but do not show the temporary limits of impact. .
18. Please show all temporary and permanent areas of impact for any every part of the construction project and also provide details on every temporary or permanent easement that will be required. Please provide a summary and a map that identifies by APN the amount of right of way that will need to be condemned; the amount private property for

of slope easements that will need to be condemned; the amount of temporary construction easements that will need to be condemned.

19. Please describe in detail all temporary and permanent impacts to the driveway located at 31013 Mountain Ridge Road where the road grade will be reduced by 5 feet.
20. Please describe in detail and provide detailed plans for all driveways and existing intersecting roads (Elmond Drive, Adams Ct., Megan Terrace) where either through grading or fill, driveways or existing intersecting roads will be impacted, the extent of the impact (including elevation changes, proposed grading, easements or right of way required and Figures depicting the impact.
21. Please provide detailed figures for the entire project showing all of the visual changes that will occur to Mountain Ridge Road from its current existing grade. It is critical to be able to visualize the changes that will occur during the construction process, in order to determine the Visual Impact and significance.
22. Please provide detailed figures for the entire project showing the construction of the manufactured slopes, some of which will be 30-50 feet high. Please describe in detail how the slopes will be constructed, what materials and provide a figure showing all of the slopes on both the East Side and West Side of the road that will be required.
23. Please provide detailed figures for the entire project showing the construction of retaining walls that will be required and description of the materials that will be used. Please describe in detail how the retaining walls will be constructed and provide a figure showing all retaining walls on both the East Side and the West Side of Mountain Ridge Road.
24. Please provide a detailed summary of any land form berms or noise barriers that will be located along Mountain Ridge Road. Please discuss in detail what types of berms, walls or other structures will be used as a noise barrier including details on their construction, the types of construction materials that will be used and provide Figures showing their location and size. Also, please update the Mountain Ridge Road Public Visual Impact analysis as this was not discussed in the Visual Impact Study.
25. Please discuss in detail whether any construction light will be used. If so, provide details as to the types of units, the proposed height of the units, and where the units will be located during each phase of construction. Update the Mountain Ridge Road Visual Impact study as this issue was not discussed.
26. Please discuss in detail whether any temporary noise construction walls or barriers will be used. If so, please discuss in detail what types noise construction containment features will be used, their locations, construction materials and please update the Mountain Ridge Road Visual Impact analysis as this issue was not discussed.

Via Email

July 22, 2014

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Subject: Public Comments to the 2014 Revised DEIR (“REIR”) pertaining to **the May 16, 2014 RECON Noise Technical Analysis for the Mountain Ridge Road Fire Station Alternative** with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

The following are my Comments pertaining to the June 2014 Revised Draft Environmental Impact Report (“REIR”) regarding the **May 16, 2014 RECON Noise Technical Analysis for the Mountain Ridge Road Fire Station Alternative**

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in this letter and any Attachments.

Please respond to each specific issue raised in this letter as part of the County’s Response to Public Comments.

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Sincerely,

A handwritten signature in black ink, appearing to read 'James E. Gordon', written in a cursive style.

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**COMMENTS TO THE RECON MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE –
NOISE ANALYSIS DATED MAY 16, 2014**

General Overview and Comments

The Recon “**Mountain Ridge Road Fire Station Alternative – Noise Analysis** dated May 16,2014 was prepared as required by CEQA to address these two items as well as others:

1. Identify, summarize, quantify and document the impacts of the Alternative (Mountain Ridge Public) to the Project conditions as they exists today; and
2. Determine the direct impact delta and the cumulative impact delta of the Alternative (Mountain Ridge Public) to the Project conditions as they exist today.

An Environmental Impact Report (EIR) must contain an accurate description of the physical environmental conditions at the project site **as they exist at the time that the environmental analysis is conducted**. This environmental setting is the “**baseline**” physical condition from which the County measures whether an impact is significant.

Mountain Ridge Existing is approximately a 2,500 foot road that runs from Circle R Drive to the southern boundary of the LHR project built to approximately a 5 MPH design speed. The majority of the homes in the Mountain Ridge Road Community are located in Circle R Estates. Circle R Estates is a HOA community located on the Eastern side of a 1,200 foot section of Mountain Ridge Road that runs south from the LHR project’s southern boundary; along Megan Terrance and Adams Ct., to the top of the steep hill south of Megan Terrace.

An EIR is mandated by CEQA in response to the County’s a Mountain Ridge Road Fire Station Alternative. This EIR report will be relied on by the County during the Condemnation and Eminent Domain Process to: (1) condemn an existing right-of-way from easement holders; (2) condemn acres of private land from property owners for permanent slope easements; (3) condemn tens or acres of private land for construction easements; and (4) condemn an unknown amount of private property from an unknown number of property owners to build interim ingress and egress roads.

The Alternative requires a COMPLETE REBUILD of the road. As stated on page 6 of the Recon Report, construction would occur along 0.6 miles of Mountain Ridge Road and “**occur over approximately 20 acres with a daily disturbance of 5 acres.**” Portions of the Alterative will involve “raising” the existing road more than 20 feet above the current grade and result in the construction of manufactured slopes 30-50 feet high. More than 10,000 truckloads of fill will be required. This a major construction project to an existing road that is only 20 feet wide and 2,500 feet long.

All Comparisons Must Be Based on Mountain Ridge Existing

The County cannot compare the Alternative, a County Public Road, classified as a Rural Residential Collector, to a hypothetical road that **DOES NOT EXIST**.

CEQA, County regulations and the Condemnation process requires that the Alternative (Mountain Ridge Public) be compared to the existing ambient conditions (traffic, noise, greenhouse gas, etc.) as they exist today.

According to the developer; they do not have the rights to build Mountain Ridge Private. (*See Request for Modification to Road Standards (Mortification #7 – Reduce Design Speed Mountain Ridge Road)*)

According to the developer in the request above:

1. “[a]t a 25 MPH design speed, the existing road would have to be completely rebuilt.”
2. “The newly designed road would require permission to grade from multiple neighbors and would affect multiple access points along the entire length of the road.”
3. “The cost and time to acquire these approvals would be considerable (if they would even be given from adjacent hostile neighbors) and would be very disruptive to the neighbors during construction.”
4. “[t]he impacts to the existing homes on this road would be tremendous including disruption of water and electrical services...[and] the additional costs to reconstruct the entire road and add either many large slopes and/or large retaining walls would be prohibitive.”
5. “Existing vertical curves would have to be lengthened considerably (which would result in some existing driveways no longer being accessible since they are at the sag or peak of the existing curves)” and
6. “[Further, the] impact to the existing homes on this road would be tremendous and the need for permission to grade letters from a large number of neighbors could cause serious delays (and/or kill this project).”

It is clear that Mountain Ridge Private does not exist. As stated above, Mountain Ridge Private would have to be **“newly designed”** and the **“existing road would have to be completely rebuilt.”**

The *Lilac Hills Ranch Traffic Impact Study* dated May 16, 2014, submitted to the County pursuant to the Mountain Ridge Road Fire Station Alternative **defines “the existing road.”** On pages 10 and 11, with emphasis added, Chen Ryan states:

“As Mountain Ridge Road currently exists, the road is a narrow 20 foot wide travel-way which currently serves a small amount of homes and is proposed to provide access to the project site;”

"The current volume on Mountain Ridge Road is 160 ADT. The project will add approximately 3,220 ADT to Mountain Ridge Road for a total of 3,570 ADT;" and

"Mountain Ridge Road is a residential serving road with several vertical curves and design speed as low as approximately 5 mph along certain sections."

Creating a hypothetical road that does not exist and cannot be built will result in a CEQA challenge.

Also, I am not sure how the County will word a Resolution of Necessity to condemn a hypothetical road that does not exist and cannot be built.

Mountain Ridge Existing, built to an approximate design speed of 5 MPH with an average of 160 ADT's is **the existing baseline to which the Alternative must be compared.**

Overview of a CEQA Challenge

The primary purpose of CEQA is to insure that the County is informed about the potential adverse impacts to the environment of a project before the County approves the project.

The County's compliance with CEQA is based on the assumption that the County will proceed in good faith and circulate an EIR for public review that accurately describes the proposed project.

Mountain Ridge Existing is the baseline that the Alternative must be compared to. Mountain Ridge Private does not exist and CEQA states that the EIR must contain a description of the physical environment at the time the environmental analysis is commenced. Mountain Ridge Private is a hypothetical road.

By way or background and to provide some clarity to the numerous Mountain Ridge Roads discussed throughout the County's REIR, the following provides a summary of the key Mountain Ridge Roads:

1. Mountain Ridge Existing is the current road. It is built to an approximately 5 MPH designed speed, has a paved road section of 20 feet, providing two 10 foot travel lanes. It has a 21% grade and very steep (80') vertical curves. The road resides in a 40 foot easement and in parts of the road, the edge of the paved road is surrounded by granite walls or steep sloping wetlands. It is a backcountry small private road, serving about 20 homes with some hair raising "whoop-de-dooos" on the vertical curves. In many parts of the road, the easement drops ten feet or more from the edge of the paved road and cannot be used. The existing road **cannot be improved without being rebuilt.**
2. Mountain Ridge Private is used by the County to describe, without clarification, the various versions of Mountain Ridge Existing. It is very confusing because it is never clearly discussed or defined and the definition keeps changing throughout the REIR. Also **there are numerous versions of Mountain Ridge throughout the REIR technical reports** which the County relies on.

Some versions of Mountain Ridge talk about design speed exception requests. Some versions of it pertain to a dirt road on the LHR project site. Some versions of it discuss a 2-lane private road. Some versions just call it a private road. There are many references to Mountain Ridge with no discussion or clarification as to: (1) which Mountain Ridge Road is being discussed; (2) what are the existing design specifications of the road being discussed; (3) what levels of improvements (if any) that have been assumed for the road being discussed: and (4) what are the direct and cumulative impacts of making those improvements.

3. Mountain Ridge Improved is the road used by the County as the baseline in the REIR for determining the impacts to the community of the *Mountain Ridge Road Fire Station Alternative*. This road, built to a 30 MPH design speed, is assumed by the County to “exist” in the future at the time the road is “converted” to a Public Road. However, it cannot exist unless the existing road is completely rebuilt and the existing road cannot be rebuilt unless Mountain Ridge Existing is Condemned.
4. Mountain Ridge Public is the proposed Public Rural Residential Collector road built to County Public Road Standards with 30 MPH design speed and is one of the two “Alternatives” discussed. There is also Mountain Ridge Public Option #2 road Alternative, which is the same Public Rural Residential Collector but with road design exceptions requested from the County standards.

The key issue in the REIR is the County made Mountain Ridge Existing **DISAPPEAR**. Mountain Ridge Existing has been **replaced** by Mountain Ridge Improved (a hypothetical road that does not exist).

Thus, for purposes of the Environmental Impact Report, the County created Mountain Ridge Improved and the County required that the road they created be used as the baseline by all of its experts including: traffic; noise; visual, and air quality among others. The result is that the REIR compares the Alternative to a road created by the County that does not exist (the Project).

From a CEQA perspective, Mountain Ridge Improved (a nonexistent road) is not the baseline. Mountain Ridge Existing is the baseline. At this point, the community has a valid CEQA challenge.

However, the ramifications of creating Mountain Ridge Improved is far more serious than a CEQA challenge.

To accommodate the Fire Station, the County requires Mountain Ridge Existing to be a County Public Road (Mountain Ridge Public) and proposes to use its powers of Condemnation to acquire the right-of-way and easements necessary. The right-of-way and easements obtained through the Condemnation process would then be transferred to the private owners developing the project.

Condemnation of private property by the Government (County) is very serious and sensitive issue. One of the key protections given to homeowners by the County is the requirement of an Environmental Impact Review process which looks at all the environmental impacts to the homeowners that will result from the County Condemning their property.

Mr. Mark Slovick

July 22, 2014

Page 6 of 6

An Environmental Impact Report requires the County to determine the impact to the community by evaluating Mountain Ridge Public (known as the "Alternative") to Mountain Ridge Existing. However this evaluation would result in massive significant impacts that could not be mitigated.

As discussed above, the Developers do not have the rights necessary to build Mountain Ridge Improved. Even if Mountain Ridge Improved could be build, it would take a year or more to construct. Mountain Ridge Improved would require: the construction of interim ingress/egress road; relocating utilities; construction in wetlands and waterways; bulldozing and destroying driveways and existing streets; building retaining walls and slopes that would be 50 feet high and require more than 10,000 truckloads of fill. This construction would all occur on a roadway that is 20 feet wide and 2,500 feet long. The result is that if the County followed CEQA standards, as noted above by the Developer, the findings will kill the Lilac Hills Ranch project.

Thus comes the County solution. Rather than compare the proposed Mountain Ridge Public to Mountain Ridge Existing as required by CEQA; **the County will compare Mountain Ridge Public to Mountain Ridge Improved.**

The difference is massive. Neither the County nor the Developer have the rights to build Mountain Ridge Improved. To convert Mountain Ridge Improved to Mountain Ridge Public, although significant, requires mostly increasing the graded width, additional slopes, drainage and adding street lights.

To convert Mountain Ridge Existing to Mountain Ridge Improved requires BUILDING THE ENTIRE ROAD FROM SCRATCH. This is a MASSIVE DIFFERENCE TO THE COMMUNITY AS WELL AS THE HOMEOWNERS WHO ARE LIVING ON THE ROAD.

In summary, using Mountain Ridge Improved (a hypothetical and nonexistent road) as the baseline for the environmental impact report significantly and consciously understates the impacts of the Alternative to the Project and does not comply with CEQA requirements. The EIR must be changed and recirculated for public review.

Using Mountain Ridge Improved for purposes of determining impacts to homeowners whose land and right-of-way is being condemned not only significantly and consciously understates the impacts of the Alternative to the Proposed project; it also does not comply with the intent and purpose of the environmental impact report under the Condemnation process.

Please provide a copy of the County's Requirements for this project.

Please provide a copy of the Scope of Work for each of the technical consultants for this project.

Via Email

July 26, 2014

Mark Slovick, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Mark.Slovick@sdcounty.ca.gov
[\(858\) 495-5172](tel:(858)495-5172)

Subject: Revised DEIR Public Comments Regarding **The Lilac Hills Ranch Firewise 2000 Inc. May 1, 2014 Evacuation Plan** with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

The following are my Public Comments pertaining to The Lilac Hills Ranch Firewise 2000 Inc. May 1, 2014 Evacuation Plan.

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in this letter and any Attachments.

Please respond to each specific issue raised in this letter as part of the County's Response to Public Comments.

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Sincerely,



James E. Gordon
9733 Adams Ct.
Escondido, CA 92026
Jegordon888@gmail.com

**THE FOLLOWING COMMENTS APPLY TO THE LILAC HILLS RANCH
FIREWISE 2000 INC. MAY 1, 2014 EVACUATION PLAN**

The following comments provide information necessary to determine the significant impacts during an emergency evacuation including the thresholds levels and adequacy of Lilac Hills Ranch Evacuation Plan. These questions also relate to determining the factors upon which Firewise relied upon in its conclusion that the existing and planned roads provide “adequate” multi-directional primary and secondary emergency evacuation routes; as well as gauging potential impacts against the existing physical conditions.

Comments to Exhibit 1 – Evacuation Plan Map - on page 16 of 21 of the Firewise Lilac Hills Ranch Evacuation Plan

The plan shows Mountain Ridge Road as a primary evacuation road. Figure 2.7-3 states that Mountain Ridge Road will be improved to private road standards from the project boundary to Circle R Drive.

Can you please describe in detail if the evacuation plan is basing its assumptions on Mountain Ridge Road being improved to a 30 mph design speed as a private road. The current road is designed to 15 mph design speed with small sections being designed to 5 mph standards. Please discuss in detail how the various design speeds of Mountain Ridge Road will impact emergency evacuation. As the County is aware, this is a significant issue. Please be specific as to what road design standards Mountain Ridge is assumed to have been built to for use as a primary evacuation road.

Please discuss in detail the impact to project residents using Mountain Ridge Road as main evacuation route if the road is not improved to County private road standards. The details should include specifics as to how the current and various proposed alternatives to the road impact traffic flow and capacity, especially in consideration of the existing vertical curves. Please discuss in detail how the current vertical curves would impact traffic flow towards Circle R Drive (going south) from the project in an emergency evacuation situation.

Please discuss in detail how all of the possible factors and scenarios discussed above impact emergency vehicles trying to access the project site during an emergency such as a wild land fire situation.

First Comment to Page 8 of 21 of the Firewise May 2014 Lilac Hills Evacuation Plan

On page 8, Firewise states in the first full paragraph: “The location of the Lilac Hills Ranch development and the existing and planned roads provide **adequate** multi-directional primary and secondary emergency evacuation routes.” (Emphasis added).

Please describe in detail all studies, analysis, road modeling, and traffic modeling that was conducted or reviewed to determine that the roads referenced above were “adequate.”

Mr. Mark Slovick

July 26, 2014

Page 3 of 4

Please describe in detail all criteria that was reviewed and or relied upon for assessing the adequacy of the existing and planned off-site roads to provide “adequate” multi-directional primary and secondary emergency evacuation.

Please describe in detail for all roads disused in the Lilac Hills Ranch Evacuation Plan what assumptions were made to the ROADS FROM THEIR EXISTING CONDITION upon which Firewise concludes that there is adequate primary and secondary evacuation roads.

Please describe in detail the number of vehicles that will be using existing or planned road during an emergency evacuation. Please be specific as to the number of vehicles by road and the time frame assumed in determining that the existing and planned roads provide “adequate” multi-directional primary and secondary evacuation routes. Also, please discuss in detail all traffic modeling that Firewise conducted or relied upon as the basis for determining that “adequate” primary and secondary emergency evacuation exists.

What assumptions did Firewise use to determine in a regional evacuation scenario that the existing and planned roads provide “adequate” multi-directional primary and secondary emergency evacuation routes? Please discuss in detail the traffic loads from evacuating homes within the vicinity of the LHR project and how those traffic loads would impact the “adequacy” of the existing and planned roads during an evacuation.

West Lilac Road is on the top of a ridge stretching almost from Circle R Drive to Old 395. As discussed in the report, fire rapidly climbs up slopes towards the top of ridges. West Lilac has steep slopes from the road west towards the project and east towards Valley Center. This is a significant impact. Did Firewise analyze or review the topography of the West Lilac Road to determine if the road might be impacted and consumed by smoke and fire during a wild land fire situation. If yes, please discuss in detail.

Did Firewise conduct any studies or analysis pertaining to the “adequacy” of the existing or proposed off-site roads to determine the impact to residents of LHR during an evacuation if any portion of their evacuation route was closed --- such as a portion of West Lilac in the northern portion of the LHR project? If yes, please discuss in detail all studies or analysis conducted and specific each specific scenario analyzed, including its impact during an emergency evacuation.

Second Comment to Page 8 of 21 of the Firewise 2014 Lilac Hills Evacuation Plan

Firewise states that “during an emergency evacuation from the proposed Lilac Hills Ranch Development, the primary and secondary roadways will have to be shared with responding emergency vehicles and may reduce the available useable widths of the roadways required for smooth evacuating process.”

Please discuss in detail by each off-site emergency evacuation road the potential impact from the statement above. What analysis was conducted to determine the impact? Was the impact from sharing primary and secondary roadways with responding emergency vehicles considered in the determination that the existing and planned roads provide “adequate” multi-directional primary and secondary

emergency evacuation routes? If yes, please describe in detail what impacts were evaluated to determine “adequacy.”

Third Comment to Page 8 of 21 of the Firewise 2014 Lilac Hills Evacuation Plan

Firewise states on page 8 of 21 that: “It is important to note that there is a potential of backups at the various intersecting external roadways during emergency evacuations.”

What factors of the potential for backups at the various intersecting external roadways were analyzed to determine that the existing and planned roads provide “adequate” multi-directional primary and secondary emergency evacuation routes? Please discuss in detail pertaining to any studies or modeling conducted by Firewise or relied upon by Firewise in its conclusion that the Evacuation Plan provides adequate primary and secondary emergency evacuation capabilities.

Please discuss each external roadway and intersection analyzed, the types of information relied upon and any analysis or modeling conducted to determine the “adequacy” and impacts. Also, please discuss in detail what impacts would occur to residents of the LHR Project during an emergency evacuation if there were backups on external roadways and intersections.

Fourth Comment to Page 8 of 21 of the Firewise 2014 Lilac Hills Evacuation Plan

Does the evacuation plan assume that any part of the Lilac Hills Ranch will provide shelter or be used as a shelter in place safety zone during a wildfire situation? If yes, please discuss in detail which parts of the LHR project will be used.

Is Firewise recommending that any part of the LHR project be used as a shelter in place instead of evacuation. If yes, please discuss in detail.

Via Email

July 25, 2014

Mark Slovick, Project Manager
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Mark.Slovick@sdcounty.ca.gov
[\(858\) 495-5172](tel:(858)495-5172)

Subject: Public Comments to Chapter 4.9 (**Analysis of the Mountain Ridge Road Fire Station Alternative**) of the Project Alternatives section of the REIR with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

The following are my Public Comments pertaining to the June 2014 Revised Draft Environmental Impact Report ("REIR") regarding Section 4.9 – **Analysis of the Mountain Ridge Road Fire Station Alternative**.

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in this letter.

Please respond to each specific issue raised in this letter as part of the County's Response to Public Comments.

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Sincerely,

A handwritten signature in black ink, appearing to read 'James E. Gordon', written over a dashed horizontal line.

James E. Gordon
9733 Adams Ct.
Escondido, CA 92026
Jegordon888@gmail.com

The following comments are part of the public participation process pertain to Chapter 4.0 – PROJECT ALTERNATIVES – and more specifically to Alternative 4.9 –ANALYSIS OF THE MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE - of the Revised Draft Environment Impact Report. Please respond to each comment in detail and provide detailed maps, figures and drawings as requested.

1. If the Deer Springs Fire Protection District (“DSFPD”) decides that it is not going to have a fire station located on Mountain Ridge Road, will the County still proceed with this alternative. If yes or maybe, please provide a detailed explanation why, the anticipated timing and benefit to the public if the County proceeds to acquire rights for the Developer.
2. If the DSFPD decides that it may consider locating a fire station on Mountain Ridge Road but does not require the road to be improved to public road standards, will the County still proceed with this alternative. If yes or maybe, please provide a detailed explanation why, the anticipated timing and benefit to the Public if the County proceeds to acquire rights for the Developer.
3. If the DSFPD decides to located a fire station at another location within LHR, such as Main Street, Covey or West Lilac area; will the County still proceed with this alternative. If yes or maybe, please provide a detailed explanation why, the anticipated timing and benefit to the public if the County proceeds to acquire rights for the Developer.
4. If the County proceeds with this alternative as discussed in Section 4.9, will the County consider using Eminent Domain prior to the construction of dwelling units in Phase 3 to acquire the requisite Right of Way (ROW) and all necessary construction and slope easements. If yes or maybe, please provide a detailed explanation why, the anticipated timing and benefit to the public if the County proceeds.
5. If the developer changes the phasing of its construction, please analyze each scenario of development (such as Phase 1 and 5, Phase 1, 4 and 5, Phase 1 and 4, etc.) which will trigger the county use of Eminent Domain if they proceed with this option. Please provide specifics as to not only the considerations, but also the timing, and reasons for the timing, of the use of Eminent Domain.
6. If a fire station is not located on Mountain Ridge Road, will the County Use Eminent Domain in any way assist the developer to use Mountain Ridge Road for the placement of water and sewer? If yes or maybe, please provide a detailed explanation why, the anticipated timing and benefit to the Public if the County proceeds to acquire rights for the Developer.
7. If a fire station is not located on Mountain Ridge Road, will the County use Eminent Domain in any way to assist the developer in mitigating, changing or enhancing traffic flow or emergency access to or from the LHR project site. If yes or maybe, please provide a detailed explanation why, the anticipated timing and benefit to the Public if the County proceeds to acquire rights for the Developer.

8. If the County proceeds with the Mountain Ridge Public Road option, will the developer be able to change its intended use of the Southern portion of the project site from a gated neighborhood for senior citizens to another type of use. Please discuss in details any other uses of the Southern Portion of the site (Phase 4 & 5) that have been considered or discussed by the developer if Mountain Ridge did not have easement limitations or if Mountain Ridge was converted to a public road.
9. What assurances will the County seek and how will the County enforce construction of Phase 3 of the project as described in the Specific Plan and REIR once Eminent Domain is used to convert Mountain Ridge into a public road.
10. Please provide a map and summary of the Access Dependency of Mountain Ridge Road as listed in Table 4.9 (page 4-178) of the REIR. The summary should be list by APN lot # all lots that have access to Mountain Ridge Road and whether their access rights are: (1) to all of Mountain Ridge Road; (2)the middle third of Mountain Ridge Road; or (3) the lower third of Mountain Ridge Road.
11. Does the County intend to use Eminent Domain to help the developer acquire any type of land, ROW or easements (permanent or temporary) for improvements to Mountain Ridge Road if **the road remains private**? Please discuss in detail and provide the information delineated below for any condemnation the County may consider with pertaining to Mountain Ridge Road as a Private Road.
 - (a) The amount of right-of-way the County plans to condemn;
 - (b) The amount of land the County plans to condemn for grading;
 - (c) The amount of land required for slope easements and whether the County will use Eminent Domain to acquire the slope easements;
 - (D)the amount of land required for grading easements and whether the County will use Eminent Domain to acquire the grading easements;
 - (E)) the amount of land required for easements to maintain pedestrian and vehicular egress and ingress during construction and whether the County plans to use Eminent Domain to acquire these easements;
 - (f) the amount of land required for easements related to construction activities, such as staging, and whether the County plans to use Eminent Domain for these easements; and
 - (g) Please list any other easements, permeant or temporary, that will be required for construction and whether the County plans to use Eminent Domain to acquire these easements.

12. Please describe in detail and summarize with a chart by APN the amount of land, right-of-way and easements that the County and the developer will require to be condemned under this Mountain Ridge Road Public Road option. The summary on page 4-179 is confusing and does not fully address the extent of Condemnation required:

Please itemize each of the following:

(a) The amount of right-of-way the County plans to condemn;

(b) The amount of land the County plans to condemn for grading;

(c) The amount of land required for slope easements and whether the County will use Eminent Domain to acquire the slope easements;

(D)the amount of land required for grading easements and whether the County will use Eminent Domain to acquire the grading easements;

(e) The amount of land required for easements to maintain pedestrian and vehicular egress and ingress during construction and whether the County plans to use Eminent Domain to acquire these easements;

(f) the amount of land required for easements related to construction activities, such as staging, and whether the County plans to use Eminent Domain for these easements; and

(g) Please list any other easements, permanent or temporary, that will be required for construction and whether the County plans to use Eminent Domain to acquire these easements.

13. Please provide a summary chart similar to Figure's 4-12, 4-13 and 4-18 showing the footprint and impact to each lot along Mountain Ridge Road of all easements (permanent, temporary, slope, grading and excavation, etc.) that will be required to convert Mountain Ridge road to a public road.

14. For Adam Court, please describe in detail the amount of land, right-of-way and easements that the County and the developer will require to be condemned to construct Mountain Ridge Road **as a public road**. Please itemize each of the following: (1) the amount of right-of-way the County plans to condemn; (2) the amount of land the County plans to condemn for grading; (3) the amount of land required for slope easements and whether the County will use Eminent Domain to acquire the slope easements; (3)the amount of land required for grading easements and whether the County will use Eminent Domain to acquire the grading easements; (4) the amount of land required for easements to maintain pedestrian and vehicular egress and ingress during construction and whether the County plans to use Eminent Domain to acquire these easements; the amount of land required ; and please list any other easements that will be required for construction as well as for the use of Mountain Ridge as a public road and whether

the County plans to use Eminent Domain to acquire these easements. Also please describe the impact to Adam Court including changes to existing topography.

15. For Megan Terrace, please describe in detail the amount of land, right-of-way and easements that the County and the developer will require to be condemned to construct Mountain Ridge Road **as a public road**. Please itemize each of the following: (1) the amount of right-of-way the County plans to condemn; (2) the amount of land the County plans to condemn for grading; (3) the amount of land required for slope easements and whether the County will use Eminent Domain to acquire the slope easements; (3) the amount of land required for grading easements and whether the County will use Eminent Domain to acquire the grading easements; (4) the amount of land required for easements to maintain pedestrian and vehicular egress and ingress during construction and whether the County plans to use Eminent Domain to acquire these easements; the amount of land required ; and please list any other easements that will be required for construction as well as for the use of Mountain Ridge as a public road and whether the County plans to use Eminent Domain to acquire these easements. Also please describe the impact to Megan Court including changes to topography.
16. For Elmond Drive, please describe in detail the amount of land, right-of-way and easements that the County and the developer will require to be condemned to construct Mountain Ridge Road **as a public road**. Please itemize each of the following: (1) the amount of right-of-way the County plans to condemn; (2) the amount of land the County plans to condemn for grading; (3) the amount of land required for slope easements and whether the County will use Eminent Domain to acquire the slope easements; (3) the amount of land required for grading and construction easements and whether the County will use Eminent Domain to acquire the grading and construction easements; (4) the amount of land required for easements to maintain pedestrian and vehicular egress and ingress during construction and whether the County plans to use Eminent Domain to acquire these easements; the amount of land required ; and please list any other easements that will be required for construction as well as for the use of Mountain Ridge as a public road and whether the County plans to use Eminent Domain to acquire these easements. Also please describe the impact to Megan Court including changes to topography.
17. Please provide details as to the LHR project timelines that will lead to the County filing a Resolution of Necessity for the condemnation process. Please detail each factor the County will consider as to timing and approximately during which phase of LHR project construction it is estimated that the Resolution of Necessity will be filed.
18. Will the County seek a Court order granting possession prior to the conclusion of the Condemnation action? If yes, please describe in detail why the County feels that this action will be necessary.
19. Is the Fire Station proposed on Mountain Ridge road a relocation of DSFPD Station 11 or a proposed fourth DSFPD station in addition to DSFPD Stations 11, 12 and 13?

20. If this is a relocation of Station 11, what studies or Standards of Cover Analysis have been conducted to determine that Mountain Ridge Road is the best location for relocating the existing Station 11, both in the short, medium and long term? Please provide details as to the response times and ability to continue to serve existing residents in the DSFPD District. Please quantify all impacts to existing residents of the DSFPD District. Please provide a copy of all studies or analysis and summarize the findings.
21. If this is a proposed additional fourth station to the DSFPD, what studies or Standards of Cover Analysis have been conducted to determine that Mountain Ridge Road is the best location for a fourth station, both in the short, medium and long term. Please provide all reports that identify Mountain Ridge Road as the best location for the community, not just the project developer.
22. If this is a proposed additional fourth station to the DSFPD, please detail by year all costs associated with this station and who will pay the costs. Please list by calendar year the: (1) anticipated capital costs for a fourth station each year for the next 15 years; (2) anticipated operating costs for a fourth station each year for the next 15 years; (3) annual recurring expenses each year for the next 15 years; and summarize by year the anticipated revenue the Project will generate through property tax assessments for fire standby and suppression.
23. For each year above that a capital expense is required, please identify who will be responsible for the cost – the taxpayers or the developer.
24. For each year above that revenues from the project are less than the operating costs of the 4th station, please identify who will be responsible for the cost – the taxpayers or the developer.
25. If Option 3, a fourth DSFPD station (neighborhood station) located On-Site in Phase 3 is selected, does the County plan to use Eminent Domain to convert Mountain Ridge Road to a public road. If yes or maybe, please explain in detail the reasons.



Via Overnight Delivery and Electronic Mail

July 24, 2014

County of San Diego
Planning & Development Services
Attn: Mark Slovick
5510 Overland Avenue, Suite 310
San Diego, California 92123
Email: Mark.Slovick@sdcounty.ca.gov

Re: Comments to Revised Draft Environmental Impact Report with regards to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP) and related requests

Dear Mark,

The Loftin Firm, P.C. reviewed the Lilac Hills Ranch Draft Revised Environmental Impact Report (“**REIR**”), dated June 12, 2014, on behalf of James Gordon, a property owner affected by the proposed Lilac Hills Ranch development.

The proposed Lilac Hills Ranch project will substantially impact the surrounding and existing properties, which impact is not adequately or fully addressed in the REIR. Enclosed herewith, please find detailed comments on behalf of James Gordon regarding the REIR.

Sincerely,

THE LOFTIN FIRM LLP



L. Sue Loftin, Esq.

cc: James Gordon

Encl: One (1) – Comments to REIR

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T: 760.431.2111 • F: 760.431.2003 • www.loftinfirm.com • sloftin@loftinfirm.com

Matter / File No
Lilac Hills/010&446

July 24, 2014 Comments to the Revised Draft Environmental Impact Report (“REIR”) for the Lilac Hills Ranch Project, dated June 12, 2014

<u>GENERAL COMMENTS TO REIR</u>	
This Section provides general comments to the inadequacies to the REIR, areas that the REIR either fails to address at all or fails to adequately address.	
1. Mountain Ridge Road Easement Rights	<p>Mountain Ridge Road is a private road, the use of which is pursuant to specific easement rights. The road is currently located on properties owned by several property owners, subject to grants of easements which are the basis for the formation of the road.</p> <p>The easements which grant the rights to use Mountain Ridge Road specifically provide that the “easement and right of way is...declared to be appurtenant to and for the use and benefit of the present or future owner or owners of all or any portion of the Southeast Quarter of Section 30, Township 10 South, Range 2 West, San Bernardino Meridian.” The referenced property that has the beneficial use of the road and utility easement is the portion of the project which is referenced as the SRS-5 and SRS-6 projects and properties along Mountain Ridge Road to the south of the project.</p> <p>The project proposes to maintain the limited access rights through the use of gates throughout the SRS-5 and SRS-6 portions of the project; however, (i) such gates will not adequately protect the originally intended limited use of the private road, and (ii) the gates will be opened in events of emergency thereby flooding the small private road with vehicles beyond the original intended use and designed use of the road.</p> <p>Therefore, the project’s proposed uses of Mountain Ridge Road (i) expand the original scope of the road without properly and adequately preserving the limited use rights set forth in the grants of easements, (ii) does not provide protections to the existing property owners for noise, traffic, environmental, site or other related impacts, or (ii) completely address the environmental impacts on the proposed use of the Road or any of the proposed alternatives for Mountain Ridge Road.</p> <p>Reliance on Mountain Ridge Road as an access road for the project is not proper given the limited existing easement rights and thus the issues relating to the use, expansion, modification or development of Mountain Ridge Road are not adequately addressed in the REIR. Therefore, approvals relating to Mountain Ridge Road should not be granted unless and until all issues relating thereto are completely addressed and mitigated.</p>
2. Mountain Ridge Road Design	<p>The REIR provides minimal details on the standard design proposal for Mountain Ridge Road, the grading, elevations, slopes and mitigation measures. Currently, Mountain Ridge Road is designed as a private road built to a design speed of 15 MPH. The road does not meet current County private road standards but was built in accordance with the County’s approvals from prior subdivisions of properties adjacent to Mountain Ridge Road.</p> <p>The project proposes (as the standard proposal) to widen the paved portion of Mountain Ridge Road by four (4) feet to provide a 24 foot wide paved, private</p>

July 24, 2014
Comments to REIR

	<p>road within the existing 40 foot wide easement. The proposed scope of Mountain Ridge Road (excluding the proposed Alternatives), would negatively impact the habitat, waterways (creek), views and feel of the properties surrounding Mountain Ridge Road, including impacting access rights currently granted to surrounding property owners.</p> <p>The specific proposals for Mountain Ridge Road and the negative impacts are not sufficiently or adequately addressed in the REIR to provide detailed comments.</p>
<p>3. Mountain Ridge Creek Impacts</p>	<p>The alterations, removal, relocation or other impacts to the Mountain Ridge Road Creek have not been addressed in the REIR. The waterway / creek that currently crosses Mountain Ridge Road will require alterations to accommodate the expansion of Mountain Ridge Road as proposed in the project and any of the alternatives. Such impacts have not been adequately addressed in the REIR.</p>
<p>4. Condemnation of Private Road</p>	<p>Mountain Ridge Road is currently a private road intended for the use and benefit of several parcels within the project and to the south of the project. The redesignation of the private road to a public Rural Residential Collector road amounts to a taking for a private purpose--the sole purpose is to enlarge and transfer access rights in a private easement and adjacent private property to the private owners developing the project.</p> <p>The project proponents acknowledge that taking Mountain Ridge Road from a private road to a public road will require the “purchasing” of additional road easements or right-of-ways from adjacent property owners, and will further require a slope easement of approximately 9,175 square feet. However, as is acknowledged in the Exemption Request #7 (as discussed in further detail below), the adjacent property owners may be hostile to the project and thus not willing to grant the easement rights requested, in which case the only viable mechanism to obtain the added easement rights is through condemnation.</p> <p>Therefore, the redesignation of Mountain Ridge Road is not a viable alternative as it relies on a taking fundamentally for private use, which is barred by the Fifth Amendment to the U.S. Constitution, as extended to the states by the Fourteenth Amendment, even if just compensation were paid. <i>See Kelo v. City of New London, Conn., supra</i>, 545 U.S. 469, 472-473, 477 (2005).</p>
<p>PROJECT DESCRIPTION, LOCATION AND ENVIRONMENTAL SETTING</p>	
<p>5. Limited Access Rights Section 1.2.1.4, Off-Site Private Road Improvements, Page 1-17</p>	<p>REIR Statement: Due to easement limitations, Mountain Ridge Road would provide access only for the residents located in SFS-5 and SFS-6 (the southern portion of Phase 5), as well as the neighborhood park and the adjacent institutional site.</p> <p>Comment: Mountain Ridge Road is currently a private road to which only a small portion of the project has easement rights to use (subject to limitations pursuant to the grant of easements and overburdening issues). Pursuant to the specific grants of easement, the southern portion of Phase 5 (the SRS-5 and SRS-6 portion of the project) has the legal right to use Mountain Ridge Road. The easement granting language is specific and does not grant other parcels within the project the right to use the private road.</p>

July 24, 2014
Comments to REIR

	<p>The project proposes to (i) preserve the limited access rights through the placement of gates; or (ii) as an alternative, in the discussion of the Mountain Ridge Road Fire Station Alternative, condemn the private road and convert it to a public county road. As is discussed in these Comments, the proposed options are not sufficient to protect the existing property rights and the limited grant of easement intended by the underlying grantor and parties.</p> <p>Further, the REIR does not completely or openly discuss the condemnation issue and merely states that Mountain Ridge Road would be changed from a private road to a County public road. The only mechanism to accomplish the change of Mountain Ridge Road from a private road to a public road is by the County condemning the private road. The condemnation would be for the purpose of granting the developer the right to develop the road into a public road and for the ultimate benefit of the development of the project. Such condemnation would be objectionable to the abutting property owners (and beneficial owners of the easement rights to use Mountain Ridge Road).</p>
<p>6. Emergency Access Section 1.2.1.4, Gates, Page 1-17</p>	<p>REIR Statement: During an emergency situation, the gates throughout Lilac Hills would be put in an open position to provide emergency access to all persons.</p> <p>Comment: In the event of an emergency, the gates (that would otherwise restrict access to Mountain Ridge Road in compliance with the existing easement limitations) would be opened to provide an emergency route to vacate the project. Mountain Ridge Road is currently a private residential road with several vertical curves and design speed as low as approximately 5 MPH along certain sections but an overall design speed of 15 MPH. (See, <i>Traffic Study, Appendix E, Page 11</i>).</p> <p>The project proposes several alternatives for Mountain Ridge Road (one of which requires condemnation of the private road to convert the road to a County Road), to increase the design speed, but one alternative maintains the overall design speed of 15 MPH on Mountain Ridge Road.</p> <p>Due to the layout and limited access to Lilac Hills, Mountain Ridge Road very likely will become inundated with vehicles thereby placing residents to the south of the development in jeopardy. During an emergency evacuation situation, Mountain Ridge Road would be increasingly more dangerous due to the design of the road not being suited to such a large number of cars and with potential reduced visibility in a fire situation, the road would become even more dangerous. The project does not adequately provide protections to the surrounding properties in the event of an emergency due to the congestion of the small road that would occur in the event of an emergency.</p>
<p>7. Wastewater Lines Section 1.2.1.7, Infrastructure and Utilities, Page 1-25</p>	<p>REIR Statement: The project originally proposed that the off-site wastewater collection system would flow south from the project site along Mountain Ridge Road. Where Mountain Ridge Road connects with Circle R Drive, the collection system would turn west following Circle R drive to the Lower Moosa Canyon WRF. However, due to easement restrictions along Mountain Ridge Road, the project includes</p>

	<p>alternative routes, including the original Mountain Ridge Road option.</p> <p>Comment: The project’s proposal (even as an option) to place the sewer lines for the entire project through a small, private road would greatly impact and modify the road, and expand the easement rights. The proposed sewer line location along Mountain Ridge Road does not provide any protection or preserve the existing rights to those property owners along Mountain Ridge Road.</p> <p>The extensive trenching and grading for the infrastructure would negatively impact the existing waterways (creeks) and related natural habitat. Mitigation for this negative impact has not been adequately or completely addressed.</p>
<p>TRANSPORTATION AND TRAFFIC</p>	
<p>8. Section 2.3.2.3, Analysis Page 2.3-33</p>	<p>REIR Statement: Approximately 5.5 percent of the total project traffic would access Mountain Ridge Road as this access would be gated and restricted to the southern half of Phase 5 (SFS-5, SFS-6, and the institutional [church] site) uses only.</p> <p>Comment: Mountain Ridge Road is currently a private residential road with several vertical curves and design speed as low as approximately 5 MPH along certain sections and a maximum design speed of 15 MPH for the remaining portions. (<i>See, Traffic Study, Appendix E, Page 11</i>)</p> <p>The volume of traffic anticipated to use the small private road of Mountain Ridge Road will greatly increase from the current anticipated use, even with the gates providing restricted access. Pursuant to the Traffic Study (Appendix E), the project will add approximately 840 ADT to Mountain Ridge Road for a total of 1,190 ADT (<i>this increase is separate from the anticipated increase under the Mountain Ridge Road Fire Station Alternative analysis discussion below which removes the gates along Mountain Ridge Road</i>).</p> <p>To accommodate the increase in traffic, the road will need to be modified, including widening the paved width from 20 feet to 24 feet, as well as lengthening one of the vertical curves to increase the minimum design speed from 5 MPH to 15 MPH (<i>See, Traffic Study, Appendix E, Page 12</i>). However, depending upon the design alternatives accepted by the County, the road may be modified to an even greater extent to accommodate up to an additional 3,410 ADTs. Such modifications have a direct negative impact on the properties using and surrounding Mountain Ridge Road currently which have not otherwise been mitigated or properly addressed.</p> <p>Under the Private Road Maintenance Agreement (dated November 21, 1991, as Instrument No. 1993-0850511), the owners of the subdivided lots using Mountain Ridge Road are required to pay for the maintenance and repair of Mountain Ridge Road on a pro rata share. The Agreement limits the obligations of the owners; however, the proposed modifications will greatly expand the road maintenance and repair obligations thereby increasing the financial burden on the existing residents and properties subject the Agreement. The impact is not discussed or addressed in the REIR.</p>

July 24, 2014
Comments to REIR

	<p>The natural habitat and waterway (creek) impact has not been mitigated or adequately addressed in the REIR.</p>
<p>9. Section 2.3.2.3, Analysis, Page 2.3-33,</p>	<p>REIR Statement: The proposed institutional site under the project’s standard proposal would have two parking lots, one on the south side of the gates along Mountain Ridge Road, and one on the north side. This would allow project residents to park on the north side, but non-residents and visitors would access the church using the Mountain Ridge Road and park in the parking area south of the gated access.</p> <p>Comment: Providing a parking site for the institutional site to the south of the gates and providing for non-residents and visitors to access the institutional site via Mountain Ridge Road will further increase the volume of traffic along Mountain Ridge Road; which impact can only be addressed through the expansion of Mountain Ridge Road. The expansion of the Road (as discussed above) will negatively impact the surrounding residential properties, the wildlife habitat and the waterways (creek) along Mountain Ridge Road, which impacts are not adequately or completely addressed in the REIR.</p>
<p>10. Sight Distance Condemnation Section 2.3.4.2, Transportation Hazard, Page 2.3-52</p>	<p>REIR Statement: Standard County conditions of approval for a Tentative Map require all street intersections to conform to the intersectional sight distance criteria of the Public Road Standards. The project proponent would request an off-site clear space easement from the property owners. Should an easement not be granted, the County would acquire the site distance by condemnation through funds provided by the project applicant. Clear space easements would be required at Mountain Ridge Road at Circle R Drive.</p> <p>Comment: The project proponent does not have the legal rights to develop Mountain Ridge Road as proposed throughout the EIR and proposes to obtain such rights through the use of the County’s condemnation rights; however, such rights will be utilized for private purpose as is discussed in more detail herein.</p> <p>The expansion of the Road (as discussed above) will negatively impact the surrounding residential properties, the wildlife habitat and the waterways (creek) along Mountain Ridge Road, which impacts are not adequately or completely addressed in the REIR.</p>
<p>11. Mountain Ridge Noise Section 2.8.3.1, Cumulative Impact Analysis, Traffic Generated Noise, Page 2.8-23</p>	<p>REIR Statement: Based on the traffic modeling of off-site impacts, the project would result in an increase of 10 dB(A) or greater along Covey Lane, Lilac Hills Ranch Road and Mountain Ridge Road. This is a significant cumulative impact.</p> <p>Comment: The project proposes to take a rural, quiet road and increase the flow of traffic using such road thereby increasing the noise to a point that is readily noticeable and is considered a significant impact. This impact is not mitigated nor are the residents surrounding Mountain Ridge Road accommodated for such noise increase.</p>

ROAD DESIGN ALTERNATIVE 7: MOUNTAIN RIDGE ROAD – REDUCED DESIGN SPEED

Mountain Ridge Road as it exists today does not satisfy current County of San Diego standards for a Private Road and was built to a design speed of 15 MPH. If Mountain Ridge Road were to be maintained as a private road and brought to current County Standards, the “existing road would have to be rebuilt. Existing vertical curves would have to be lengthened considerably (which would result in significant impacts to existing driveways, biological habitats, RPO wetlands, existing Biological Open Space and homes). The newly designed road would require permission to grade from multiple neighbors and would affect multiple access points along the entire length of the road. The cost and time to acquire these approvals would be considerable (if they would even be given from adjacent hostile neighbors) and would be very disruptive to the neighbors during construction.” (See *Request for Modification to Road Standards (Mortification #7 – Reduce Design Speed Mountain Ridge Road)*, attached hereto as Exhibit “A” (“**Exception Request #7**”). Exception Request #7 further states that the requested modification is based on the fact that “[t]he impacts to the existing homes on this road would be tremendous including disruption of water and electrical services...[and] the additional costs to reconstruct the entire road and add either many large slopes and/or large retaining walls would be prohibitive.”

However, the project’s applicant is more explicit in explaining the impact on Mountain Ridge Road in bringing the Road to current County Private Road Standards in its original “Request for a Modification to a Road Standard (Reduced Design Speed Mountain Ridge Road), attached hereto and incorporated herein as Exhibit “B” (the “**Original Design Speed Reduction Request**”). Applicant sought to replace the Original Design Speed Reduction Request with the Exception Request #7; however, the issues highlighted in the Original Design Speed Reduction Request more accurately reflect the problems and impact with modifications to Mountain Ridge Road. The Original Design Speed Reduction Request bluntly states that “[a]t a 25 mph design speed, the existing road would have to be completely rebuilt. Existing vertical curves would have to be lengthened considerably (which would result in some existing driveways no longer being accessible since they are at the sag or peak of the existing curves)...[Further, the] impact to the existing homes on this road would be tremendous and the need for permission to grade letters from a large number of neighbors could cause serious delays (and/or kill this project). Also, the additional cost to reconstruct this entire road and add many large retaining walls would be prohibitive. Access to some of the existing driveways (on the sags or peaks) may not even be possible.”

Comment:

Exception Request #7 proposes an alternative from the standard project approvals for Mountain Ridge Road to reduce the design speed for Mountain Ridge Road from the proposed 30 MPH to 15 MPH. Within this Section of the REIR, the design standards of Mountain Ridge Road as a 30 MPH road are discussed at length and illustrate the significant impact that the utilization of Mountain Ridge Road by the overall project would have; which impacts are not adequately addressed or discussed within the REIR and therefore should not be approved.

The Exception Request #7 provides a frank discussion on the (i) insufficiency of Mountain Ridge Road to accommodate the proposed project; (ii) the substantial environmental impacts of the proposed use and modifications to Mountain Ridge Road; and (iii) the significant impact on the properties surrounding Mountain Ridge Road, including the impacts on access rights of the affected properties (through either the standard project proposal or the modifications).

The project’s standard design proposal for Mountain Ridge Road proposes to add additional width to Mountain Ridge Road on the existing grade. Since Mountain Ridge Road does not currently meet County Private Road standards, Mountain Ridge Road would require substantial redesign and rebuilding to bring the road to current standards. Although outlined in the Exception Request #7, the REIR does not adequately address the problems with Mountain Ridge Road and the impact on the surrounding properties.

The REIR is wholly insufficient at addressing the numerous environmental, traffic, noise, road or access issues relating to Mountain Ridge Road.

12. Design
 Section 4.8.1.7,
 Road Design
 Alternative 7:
 Mountain
 Ridge Road –
 Reduced
 Design Speed,
 Page 4-121

REIR Statement:

This portion of the REIR purports to discuss Exception Request #7; however it in fact discusses the construction of Mountain Ridge Road from Circle R Drive north to the project boundary with 24 feet of paved private roadway width within a 28 foot graded road easement, with a design speed of 30 MPH.

The design requires existing power poles to be relocated and existing vertical curves to be lengthened; which in turn results in 10 existing residential driveways no longer being accessible and requiring modification as well as the encroachment into the existing footprint of three single-family homes. The road design further requires manufactured slopes up to 30 feet in height, which is double the height required for the project.

As with the underlying project, the road would result in significant unmitigated character and quality impacts: the additional widening, manufactured slopes and flattening of the topography under this Alternative would result in a slightly more urbanized feel than the project.

Comment:

Failure to Discuss Exception Request #7. The heading of this particular section of the REIR, and the initial sentence (“The project’s proposed road design for this road segment corresponds to Road Exception Request #7, as submitted to the County.”) implies that this portion of the REIR discusses the Exception Request #7. As discussed above, Exception Request #7 purports to request a modification to the road standard to reduce the design speed of Mountain Ridge Road to 15 MPH; however, the analysis provided in this section relates to a design of the road at 30 MPH and therefore, the REIR does not address Exception Request #7 or the design of the road at 15 MPH.

Visual Resources. The wider and flatter Mountain Ridge Road would result in a more urbanized character relative to the project and would result in significant unmitigated character and quality impacts (*See, REIR, Page 4-122*). Existing property owners acquired property in this area because of the rural feel; changing the character and quality of the community to a more urbanized feel cannot be mitigated and should not be permitted.

Air Quality. In order to approve the project, the project proposes a General Plan Amendment to increase the density beyond that currently allowed at the project site (*see, REIR, page 4-123*). An increase in the density would have a negative impact on the air quality within the community and the surrounding properties which is not adequately addressed or mitigated against.

Access. The modifications to and design of Mountain Ridge Road would result in 10 existing residential driveways no longer being directly accessible to Mountain Ridge Road thereby requiring redesigning and rebuilding of the driveways of 10 private residences. This redesign and rebuild will substantially impact the access (ingress and egress) to these properties, the properties’ value and usability during

	<p>the time of the redesign and rebuild and potentially require other modifications not adequately addressed in the REIR or provided sufficient mitigation measures (or measures that can be evaluated).</p> <p><u>Encroachment.</u> The modifications to and design of Mountain Ridge Road would also require the encroachment into the existing footprint of multiple single-family residences. The REIR states that the encroachment will affect 3 homes; however, the overall road encroachment would affect more than 3 homes and would in fact affect multiple properties. The REIR misstates the encroachment issues. Further, the REIR does not discuss the condemnation or grant of easements that would be required, the impact on these properties or the cost thereof.</p> <p><u>Slopes.</u> The project originally proposed modifications to Mountain Ridge Road; however, with this modification, the slopes for Mountain Ridge Road would be up to 30 feet in height, which is double the height required for the project. The impact of height of the slopes on the residents adjacent to the road, the habitat surrounding the road or the waterways adjacent and transecting the road are not addressed or adequately mitigated for.</p>
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ANALYSIS OF THE MOUNTAIN RIDGE ROAD FIRE STATION ALTERNATIVE

This portion of the comments focuses solely on Section 4.9 of the REIR, the Mountain Ridge Road Fire Station Analysis. The primary comments to this section relates to the inadequacies in addressing the impact of the converting a small private road intended for limited use to a public road with no access limitations, which modified road would include 35 foot slopes and negatively impact access rights of properties currently accessing and utilizing Mountain Ridge Road. This Alternative would greatly impact the properties that have the current legal and vested rights to use Mountain Ridge Road, which impacts are not properly addressed or mitigated.

<p>13. Condemnation of Mountain Ridge Road Section 4.9.1, Description and Setting, Page 4-176; Section 4.9.1.4, Circulation, Page 4-179</p>	<p>REIR Statements: The Mountain Ridge Road Fire Station Alternative includes the improvement of Mountain Ridge Road “as a County public road and eliminating the gates in the southern area of the Site...”</p> <p>The access changes to the project include redesignation of Mountain Ridge Road from a private road to a public Rural Residential Collector. The construction of Mountain Ridge Road as a public road (under either proposed option) would require the acquisition of an additional 2.37 acres of right-of-way.</p> <p>Comments: Mountain Ridge Road is currently a private road intended for the use and benefit of specific parcels within the project and to the south of the parcel (those Parcels indicated as SRS-5 and SRS-6).</p> <p>The project as originally designed would attempt to limit access to Mountain Ridge Road to those parcels within the project that have specific easement rights currently granted to those parcels to preserve the original intent of the grant of easements over Mountain Ridge Road. The originally designed expansion of Mountain Ridge Road is objectionable as set forth above due to the inadequacies in addressing the impacts or mitigation measures relating to traffic, noise,</p>
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July 24, 2014
Comments to REIR

	<p>construction activity, grading, slopes, loss of habitat and impacts on the waterways (to list a few). The proposed Alternative would require the condemnation of the private road to expand the use of the road beyond the originally intended (and currently legally permissible use).</p> <p>The REIR does not discuss the impact of the condemnation of the private road upon the current owners of the road, the financial costs thereof or the fact that the condemnation is for a private benefit.</p> <p>The redesignation of the private road to a public Rural Residential Collector is a significant and material change to the habitat, waterways (creek) and adjacent properties that is not properly addressed or mitigated against. These significant and material proposed changes to Mountain Ridge Road under all proposed alternatives have been inadequately addressed or not addressed in this REIR, including the related Traffic Studies (Appendices E and V-2).</p>
<p>14. Elimination of Gates Section 4.9.1, Description and Setting Section 4.9.1.4, Circulation, page 4- 177</p>	<p>REIR Statements: The Mountain Ridge Road Fire Station Alternative includes the improvement of Mountain Ridge Road “as a County public road and eliminating the gates in the southern area of the Site...” The access changes to the project include redesignation of Mountain Ridge Road from a private road to a public Rural Residential Collector and the elimination of the gates included in Phases 4 and 5 of the project.</p> <p>The circulation changes would specifically allow the public, including the proposed on-site uses and other existing residents in the area, full access to Mountain Ridge Road.</p> <p>Comments: Mountain Ridge Road is currently a private road intended for the use and benefit of the southern portion of Phase 5 (the SRS-5 and SRS-6 portion of the project) and properties to the south of the project. Throughout the REIR, the original concepts of the project included preservation of the easement rights and limiting access to Mountain Ridge Road through the use of gates. The elimination of gates will have the direct impact of increasing the flow of traffic through Mountain Ridge Road thereby increasing the impact on the surrounding properties.</p> <p>The only proposed mitigation of such impacts are to completely rebuild Mountain Ridge Road as a wider, flatter road (which results in larger slopes and more grading) which rebuilding will have substantial environmental impacts. The proposed mitigation measure, being the rebuild of Mountain Ridge Road, is not the solution, but rather an exacerbation of the problems by creating greater environmental impacts to the properties adjacent to Mountain Ridge Road.</p>
<p>15. Mountain Ridge Road Modifications Section 4.9.1.4,</p>	<p>REIR Statements: The reclassification of Mountain Ridge Road will be accomplished through one of two proposed options:</p>

July 24, 2014
Comments to REIR

<p>Circulation, page 4-178, 4-179</p>	<p>Option 1: a 28-foot paved roadway within a 48-foot graded right-of-way, with a speed limit of 30 MPH. Option 2: a 28-foot paved roadway within a 40 foot graded right-of-way, with a speed limit of 30 MPH. Additional modifications include: lighting placed intermittently along Mountain Ridge Road; relocation of power poles, and extension of three culverts.</p> <p>Comments: Mountain Ridge Road, as a private road is based on an easement of 40 feet in total width. The expansion of the road to a 48-foot graded right-of-way would include the expansion of the road by an additional 4-feet on both sides of the road, requiring an encroachment upon or condemnation of adjacent properties to accomplish such. The expansion of Mountain Ridge Road will negatively impact the surrounding residential properties, the wildlife habitat and the waterways (creek) along Mountain Ridge Road, which impacts are not adequately or completely addressed in the REIR.</p> <p>The full impact of the expansion is not adequately addressed in the REIR.</p>
<p>16. Slopes and Grading Section 4.9.1.6, Grading, Page 4-179</p>	<p>REIR Statement: The construction of Mountain Ridge Road as a Rural Residential Collector requires that the existing hills and valleys of the roadway be minimized. Under Option 1, grading would involve an additional 4.4-acre area, and would include an additional 3,271 cubic yards of fill and 78,944 cubic yards of cut <i>above</i> that required for the construction of Mountain Ridge Road as a private road under the project. Manufactured slopes would be up to <i>35 feet</i> high and a portion of the grading would occur within an existing open space easement. (<i>Emphasis added, Page 4-179</i>).</p> <p>Comment: The REIR states in one location that the slopes would be up to 35 feet in height, and in another that the slopes would be up to 50 feet in height (see discussion under “Comparison of the Effects Section below). Regardless of the final outcome, slopes within this rural residential area surrounding Mountain Ridge Road of such great height will negatively impact and unduly burden the residential properties. The end result will be the road towering over residential properties without mitigation for the effect.</p> <p>The slopes for this alternative are between 5 feet and 20 feet above the proposed slopes for Mountain Ridge Road under the standard proposed project. As discussed above, slopes of 30 feet pose a significant impact on the surrounding residential properties; 35 feet or 50 feet slopes pose an even greater negative impact that can not be mitigated. All proposals for Mountain Ridge Road incorporating slopes of 30 to 50 feet are a significant impact and should be rejected outright.</p>

July 24, 2014
Comments to REIR

	<p>Further, a portion of the grading will need to be done within an existing open space easement which would require such easement to be vacated. The improvements to Mountain Ridge Road will eliminate existing open space and have negative impacts on the surrounding natural environment including loss of habitat and impacts on existing waterways (creek) which are not adequately address or mitigated against.</p>
<p>17. Growth Inducement Section 4.9.1.7, Growth Inducement, Page 4-180</p>	<p>REIR Statement: This proposed alternative would potentially induce growth due to improved fire and emergency services and the expansion of sewer and water infrastructure.</p> <p>Comments: Growth would also be induced by the expansion of Mountain Ridge Road coupled with opening access thereto by removal of gates throughout the project. The expansion of the road, converting it to a public road and removal of the gates would remove barriers to growth and by creating a facility that would promote the development of surrounding properties.</p> <p>Such growth could have a negative impact on the properties to the south of the project along Mountain Ridge Road, which impact can be measured by evaluating the impact of anticipated increase in traffic, noise, debris and loss of environmental habitat including loss of habitat and impacts on existing waterways (creek). The REIR does not address the growth inducement from the expansion of Mountain Ridge Road, the removal of the gates and opening access thereto to the general public.</p>
<p>18. Comparison of the Effects Section 4.9.2, Page 4-182</p>	<p>REIR Statement: The Alternative would improve Mountain Ridge Road to a Rural Residential Collector which would result in widening the roadway to 28 feet of pavement, the addition of sidewalks, curb and gutter, street lighting, additional right-of-way grading, landscaping and vegetation removal along the roadway, flattening the topography along the roadway and increased public traffic. <i>Grading associated with this improvement would be significant substantial and result in slopes up to approximately 50 feet in height.</i> (Page 4-183, Emphasis Added).</p> <p>The flattening of the peaks along Mountain Ridge Road, and the changes to the interior views of the project site, the views along Mountain Ridge Road would have increased urbanized character. (Page 4.183).</p> <p>Comment: The REIR does not address the impact of the 50 foot slopes on surrounding residential properties as the road will tower over portions of the community and certain residential properties specifically. The proposed visual buffers such as landscaping the slopes, address partially buffer and screening the project from view, but does not provide any mitigation measures to the residents along Mountain Ridge Road which are not part of the project.</p>

July 24, 2014
Comments to REIR

	<p>The increase in the urbanized feel to the project and the properties to the south of the project but along Mountain Ridge Road would negatively impact the community as a whole. Residents who purchased in the vicinity, and especially along Mountain Ridge Road, purchased their properties for the ruralness of the community and modifications to the road which would urbanize it are inconsistent with the original development and intended scope of Mountain Ridge Road.</p>
<p>19. Increased Traffic 4.9.2.3, Transportation / Traffic, Page 4-189</p>	<p>REIR Statement: A. "...The Mountain Ridge Road Fire Station Alternative ... would have the same significant mitigated circulation system and congestion impacts as the project..." (Page 4-189 and 4-190). B. The change in trip distribution, removal of gated access in Phases 4 and 5, and the Mountain Ridge road reclassification that occur under this alternative, would not alter the overall transportation/traffic impact conclusions identified for the project. (Page 4-190)</p> <p>Comment: The primary project contemplates gates along Mountain Ridge Road to eliminate public access and restrict use of Mountain Ridge Road to conform to the existing permissible easement access rights. The Alternative repeatedly states that it will include the elimination of those proposed gates and will provide full public access to Mountain Ridge Road. Any conclusion that the traffic impacts to Mountain Ridge Road are the same between having gates for the specific purpose of limiting and regulating traffic versus elimination such gates is clearly not fully analyzing the access and traffic issues.</p> <p>As discussed in more detail below, the Traffic Study indicates that the project will result in an estimated increase of over 2,000% in ADT for Mountain Ridge Road. Even with the modifications to the road to accommodate such a large flow of traffic, the residential neighborhood abutting and utilizing Mountain Ridge Road will be greatly impacted by the increase, which impact is not properly address in the REIR.</p> <p>Furthermore, while the overall project trip generation does not substantially change under the Alternative, the specific impact on Mountain Ridge Road is significant. Currently, Mountain Ridge Road has 160 ADTs, during the first phases of development of the project, Mountain Ridge Road is anticipated to experience very little, if any, increase in ADTs; however, upon construction of Phase 5, the road will experience an increase of over 2,000%.</p>
<p>20. Air Quality Analysis Appendix V-1</p>	<p>REIR Statement: The Air Quality Analysis, relying on the Traffic Study (Appendix V-2), concludes that the Alternative would have no additional impacts on operational air quality measures; but does state that similar to the project, the Alternative would have a cumulatively considerable significant impact.</p>

July 24, 2014
Comments to REIR

	<p>Comments:</p> <p>As noted below, the Traffic Study conclusions are not supported by the facts outlined in the Study. Increasing ADTs from 160 to 3,250 (at best) is a large increase that will greatly impact the air quality. Although the conclusion that the Alternative, like the project, results in a cumulatively considerable significant impact which mitigation measures will not fully alleviate, such impact is not adequately addressed in the Air Quality Analysis as it is premised on a factual conclusion in the Traffic Study that is not supported by the facts contained therein.</p>
<p>21. Traffic Study Appendix V-2</p>	<p>REIR Statement:</p> <p>The Traffic Study focuses on the Mountain Ridge Road alternative, including improving Mountain Ridge Road to County public road standards Rural Residential Collector and also eliminating the gates included as part of the originally proposed project along Mountain Ridge Road. The general conclusion is that the construction of the fire station within Phase 6, the expansion of Mountain Ridge Road and the removal of the gates does not have a significant impact.</p> <p>Comments:</p> <p>The Traffic Study outlines the project trip distribution by phase along project frontage and access roads. Throughout the early stages of the project development it is proposed that the gates along Mountain Ridge Road will remain in place thereby protecting access and mitigating the impact on residents surrounding Mountain Ridge Road. During the later phases of the project; however, Mountain Ridge Road will be condemned and converted to a public use, substantially improved by leveling and widening the current road and the gates will be removed. Such modifications to Mountain Ridge Road will greatly increase the flow of traffic along Mountain Ridge Road which impacts are not adequately addressed and are improperly classified as not having a material impact.</p> <p>Prior to the development of the project, the Traffic Study states that Mountain Ridge Road has an existing ADP of 160; however, upon full completion of the project, the project will add approximately 3,220 ADT to Mountain Ridge Road for a total of 3,570 ADT (<i>See, Traffic Study, Page 10 and 285, Table 9.3</i>). Alternatively, the project is projected to account for a total of 3,410 ADT on Mountain Ridge Road upon the completion of the project (without taking into considerations of the impact of Road 3, which is used in the worse case scenario numbers) (<i>See, Traffic Study, Page 189, Figure 5-6A</i>). The increase results in an increase of at best 3,250 ADT or at worst of 3,410 (an increase of over 2,000% ADT from the existing ADT).</p> <p>This increase in ADT also impacts the existing habitat and waterways, the residential properties adjacent to Mountain Ridge Road through increases in noise, debris and dust and loss of the rural feel and sightline views.</p>

July 24, 2014
Comments to REIR

	<p>Despite such enormous increases in the ADT for Mountain Ridge Road, the Traffic Study and REIR alleges that there is no direct impact. This conclusion is not supported by the facts.</p>
<p>22. Mountain Ridge Road Noise Report Appendix V-3</p>	<p>REIR Statement: Based on the Traffic Study for the Alternative (Appendix V-2), the Alternative would not result in greater trip generation than the proposed project; however, the Alternative would result in a redistribution of project related traffic. This redistribution could result in increased or decreased noise levels on certain roads.</p> <p>Comments: As discussed above, the Traffic Study for the Alternative reaches a conclusion (that there is minimal increase in traffic along Mountain Ridge Road under the Alternative) that is not supported by the facts. Relying on such faulty conclusion, the Noise Study does not adequately evaluate or address the noise impacts of an increase in ADTs of 160 to at best 3,250 (or at worst, 3,410).</p>

Attachments:

Exhibit “A” Exemption Request #7

Exhibit “B” Original Design Speed Reduction Request

EXHIBIT “A”
EXEMPTION REQUEST #7

[See Attached]

MODIFICATION #7
REDUCED DESIGN SPEED MOUNTAIN RIDGE ROAD
DEPARTMENT OF PUBLIC WORKS

**Request for a
Modification to a Road Standard
and/or to Project Conditions**

Project Number: TM 5571/5572 Date of Request: Sep. 13, 2012

Project Location: East side of Interstate 15, southerly of W. Lilac Road in the County of San Diego,
State of California. 127-072-20, 127-072-14 127-072-38, 127-072-41 127-072-40,

Thos. Bros. Map/Grid: 1049, 1069 APN: 127-072-46 127-072-47, 128-280-42 128-440-01, 128-280-46
128-280-27, 128-280-10, 128-440-23, 128-280-37 128-440-05

Requestor Name: Accretive Investments, Inc Telephone: (858) 546-0700

Address: 12275 El Camino Real, Suite 110, San Diego, CA 92130

Requested Modification (attach engineering sketches showing existing layout, details and notes):

The Private Road standard street section is 24' paved, 28' graded within a 40' easement (see Attachment 1). Based on the average daily traffic, the minimum design speed is 30 mph for Mountain Ridge Road. The requested modification to the road standard is to allow for a 15 mph design speed over this existing private road (that was previously built to 15 mph standards as conditioned on an adjacent subdivision).

Reason for requested Modification (provide attachment if additional space is required): _____

The requested road modification pertains to Mountain Ridge Road (private) north of Circle R Drive (see Attachment 2). At a 30 mph design speed, the existing road would have to be completely rebuilt. Existing vertical curves would have to be lengthened considerably (which would result in significant impacts to existing driveways, biological habitats, RPO wetlands, existing Biological Open Space, and homes. The newly designed road would require permission to grade from multiple neighbors and would affect multiple access points along the entire length of the road. The cost and time to acquire these approvals would be considerable (if they would even be given from adjacent hostile neighbors) and would be very disruptive to the neighbors during construction.

List alternatives that could mitigate the requested Modification (attach engineering sketches showing proposed layouts, details and notes): Redesign/reconstruct entire existing road and & retaining walls.

Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3. on reverse): The impact to the existing homes on this road would be tremendous including disruption of water and electrical service and the need for permission to grade letters from a large number of neighbors could cause serious delays. Also, the additional costs to reconstruct this entire road and add either many large slopes and/or large retaining walls would be prohibitive. An existing Bio Open Space Easement would incur grading impacts.

Provide Design and Cost Estimate for meeting the Condition (see note 3. on reverse): _____

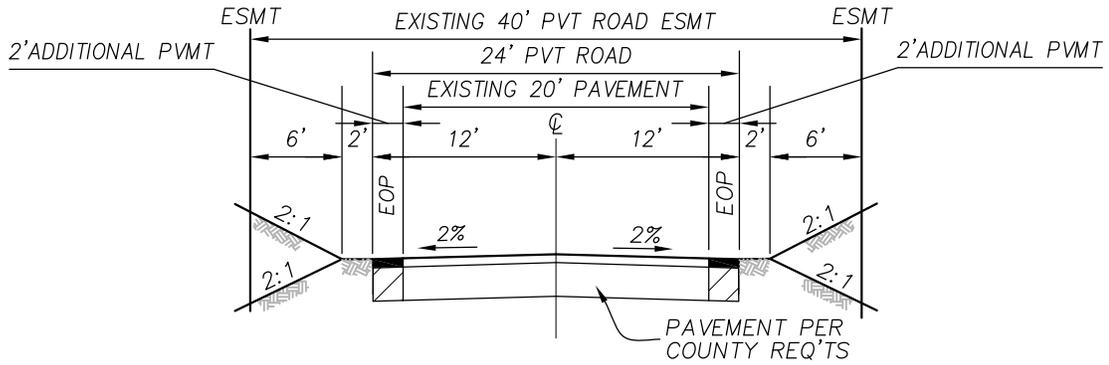
See Attachment 2 for road design with modification.

See Attachment 3 for road design without modification.

See reverse for directions and important information.

ATTACHMENT 1

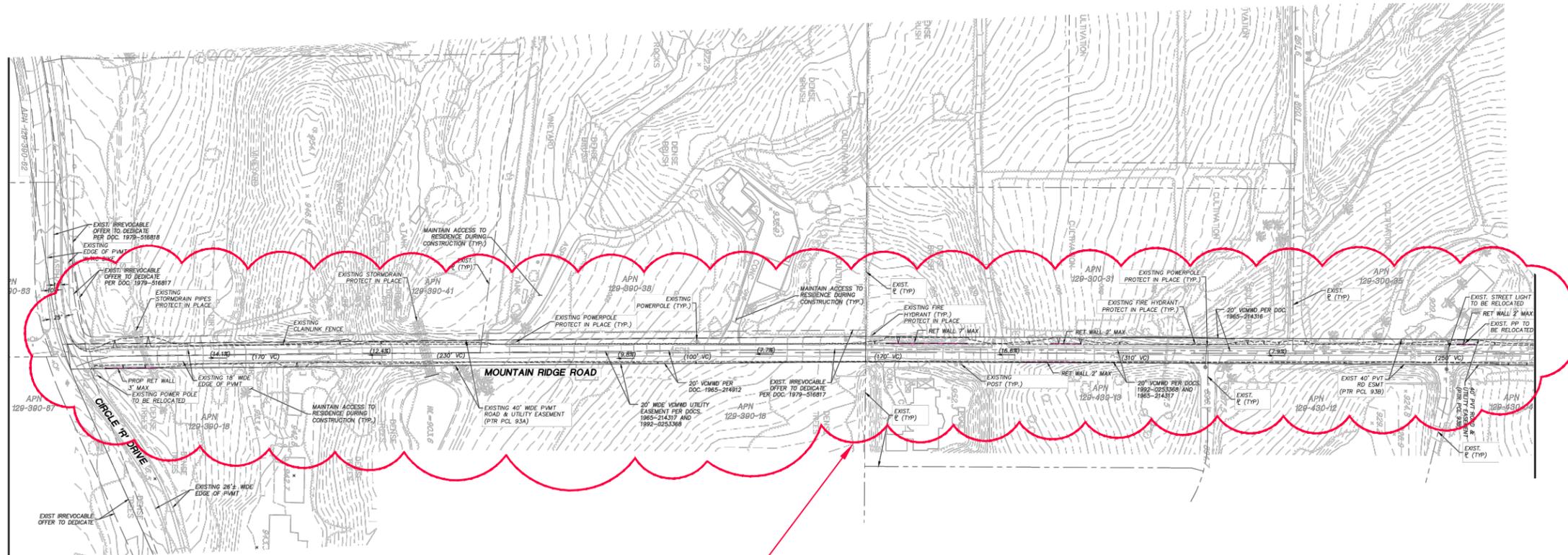
LILAC HILLS RANCH: REDUCE DESIGN SPEED MODIFICATION TO ROAD STANDARDS



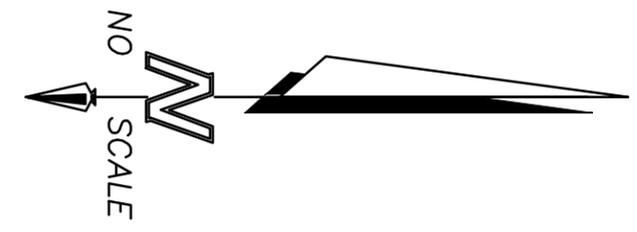
TYPICAL SECTION
PRIVATE ROAD – MOUNTAIN RIDGE ROAD
NO SCALE



ATTACHMENT 2 WITH MODIFICATION #7 MOUNTAIN RIDGE ROAD - REDUCE DESIGN SPEED

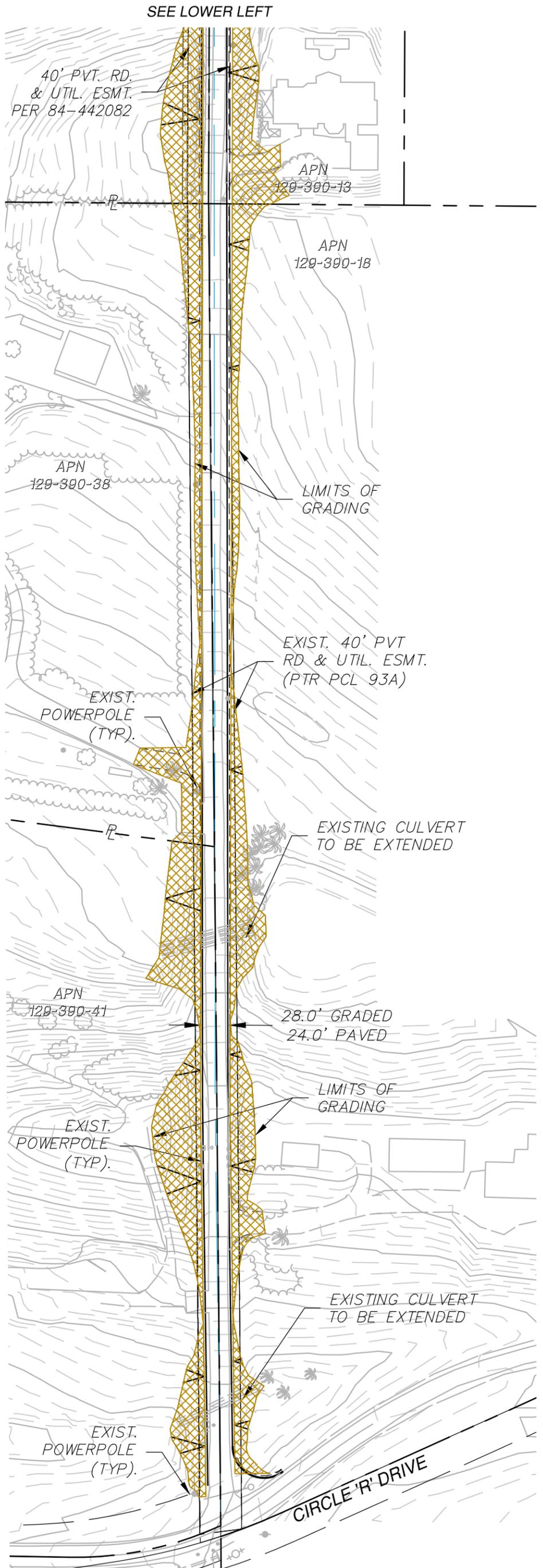
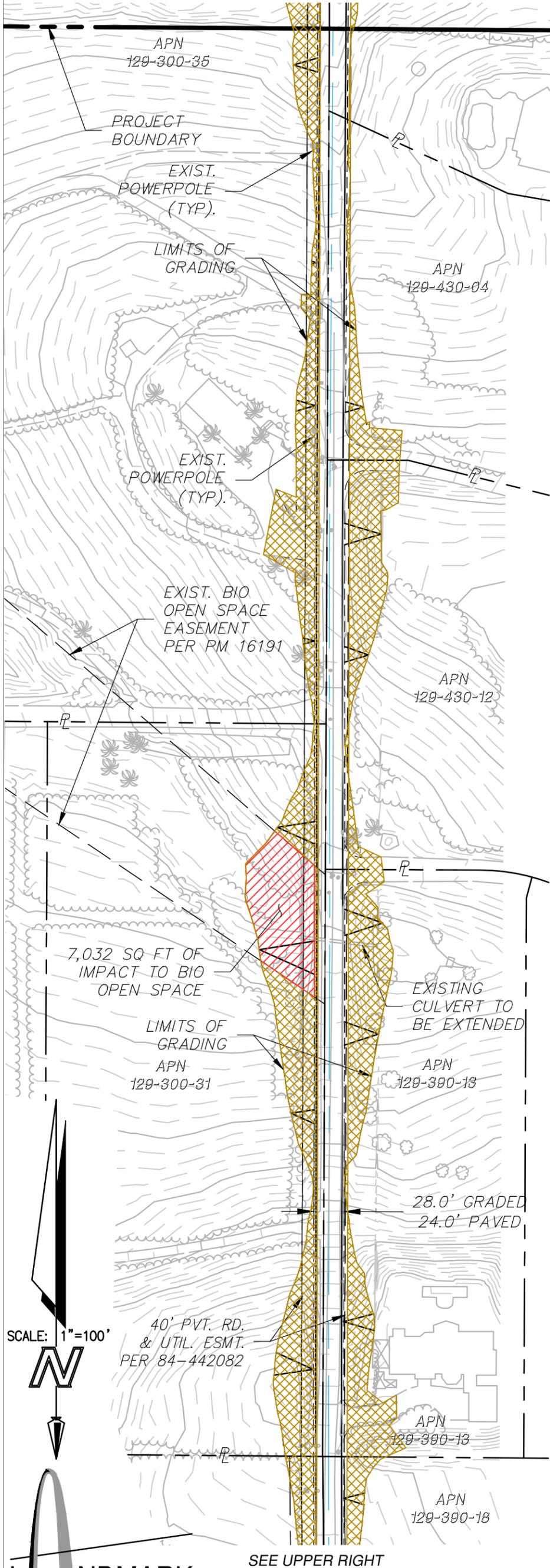


15 MPH DESIGN SPEED OVER
EXISTING PRIVATE ROAD



NOTE:
SEE MASTER PGP SHEET 6
FOR ADDITIONAL INFORMATION

ATTACHMENT 3 WITHOUT MODIFICATION #7 MOUNTAIN RIDGE ROAD - 30MPH DESIGN SPEED



SCALE: 1"=100'



EXHIBIT “B”
ORIGINAL DESIGN SPEED REDUCTION REQUEST

[See Attached]

REDUCED DESIGN SPEED MOUNTAIN RIDGE ROAD

DEPARTMENT OF PUBLIC WORKS

Request for a
Modification to a Road Standard
and/or to Project Conditions

Project Number: TM 5571/5572 Date of Request: Sep. 13, 2012

Project Location: East side of Interstate 15, southerly of W. Lilac Road in the County of San Diego, State of California.

Thos. Bros. Map/Grid: 1049, 1069 APN: 127-072-20, 127-072-14 127-072-38, 127-072-41 127-072-40, 127-072-46 127-072-47, 128-280-42 128-440-01, 128-280-46 128-280-27, 128-280-10, 128-440-23, 128-280-37 128-440-05

Requestor Name: Accretive Investments, Inc Telephone: (858) 546-0700

Address: 12275 El Camino Real, Suite 110, San Diego, CA 92130

Requested Modification (attach engineering sketches showing existing layout, details and notes):

The Private Road standard street section is 24' paved, 28' graded within a 40' easement (see Attachment 1). Based on the average daily traffic, the minimum design speed is 25 mph for Mountain Ridge Road. The requested modification to the road standard is to allow for a 15 mph design speed over this existing private road (that was previously built to 15 mph standards as conditioned on an adjacent subdivision).

Reason for requested Modification (provide attachment if additional space is required):

The requested road modification pertains to Mountain Ridge Road (private) north of Circle R Drive (see Attachment 2). At a 25 mph design speed, the existing road would have to be completely rebuilt. Existing vertical curves would have to be lengthened considerably (which would result in some existing driveways no longer being accessible since they are at the sag or peak of the existing curves). These driveways would need to be redesigned and rebuilt, while still access is maintained. Lastly, the newly designed road would require permission to grade from multiple neighbors. The cost and time to acquire these approvals would be considerable (if they would even be given from adjacent hostile neighbors).

List alternatives that could mitigate the requested Modification (attach engineering sketches showing proposed layouts, details and notes): Redesign/reconstruct entire existing road and retaining walls.

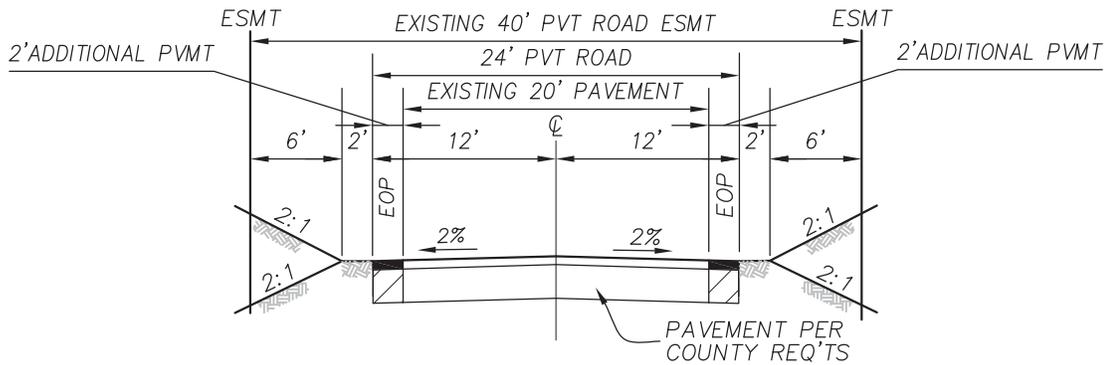
Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3. on reverse): The impact to the existing homes on this road would be tremendous and the need for permission to grade letters from a large number of neighbors could cause serious delays (and/or kill this project). Also, the additional costs to reconstruct this entire road and add many large retaining walls would be prohibitive. Access to some of the existing driveways (on the sags or peaks) may not even be possible. Finally, the existing Bio Open Space Easement would be impacted if the 25mph design was constructed.

Provide Design and Cost Estimate for meeting the Condition (see note 3. on reverse):

See reverse for directions and important information.

ATTACHMENT 1

LILAC HILLS RANCH: REDUCE DESIGN SPEED MODIFICATION TO ROAD STANDARDS

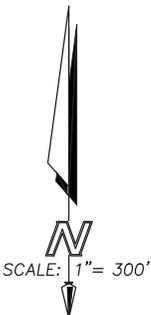
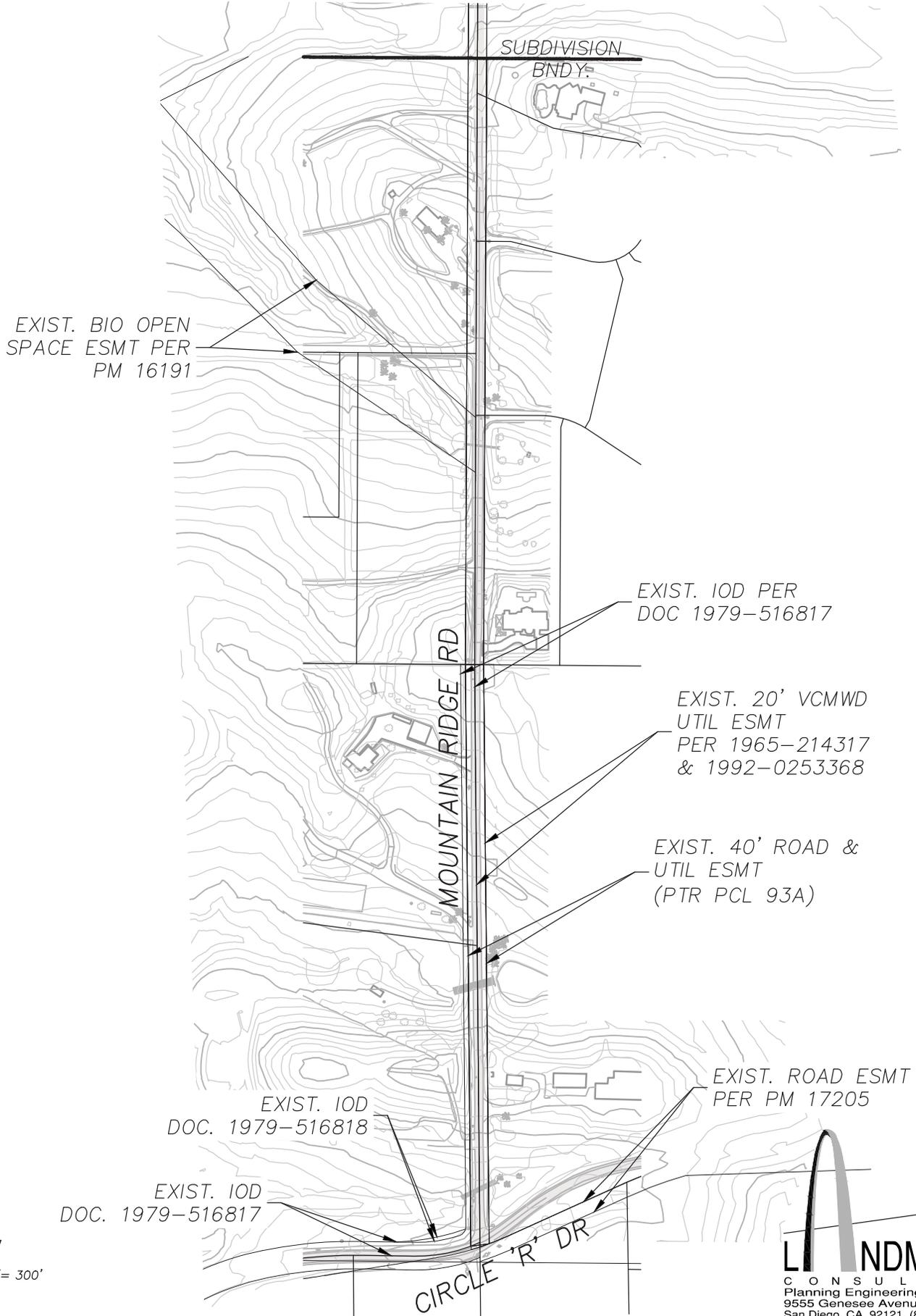


TYPICAL SECTION
PRIVATE ROAD – MOUNTAIN RIDGE ROAD
NO SCALE



ATTACHMENT 2

LILAC HILLS RANCH: REDUCE DESIGN SPEED MODIFICATION TO ROAD STANDARDS



Slovick, Mark

From: Thomas Miller <busterbytes@yahoo.com>
Sent: Friday, July 25, 2014 3:42 AM
To: Slovick, Mark
Subject: Lilac Hills Project

I am writing to express my concern over the Lilac Hills Project housing development. Valley Center, and the immediate surrounding area, is a pastoral, rural, and farming community. It is no place for a huge housing development. Please do not ruin our village by approving this project.

My family has farmed in Valley Center since the 1960's. I attended Valley Center Elementary School, and took the long bus ride to Orange Glen High School. I can still remember the feeling of peace when that school bus passed the last housing development in Escondido on the way home. Please help to preserve the county, peaceful feel of our community.

I do not believe Valley Center can sustain the increased traffic this project will bring. many people choose to commute from Valley Center to business areas closer to San Diego, Riverside, and Orange County. The increased traffic from this project could make that commute even more difficult. Please support our local residents. This project will not bring long term jobs to the area, just more families that need jobs.

Respectfully,
Sandra Grandon

Slovick, Mark

From: Florence Griffis <flovango@gmail.com>
Sent: Sunday, July 27, 2014 5:24 PM
To: Slovick, Mark
Subject: Lilac Hills Ranch Reivsed Draft EIR

Mr Slovik: I am Florence Griffis, 9542 Covey Lane, Escondido, CA 92026

I am writing regarding Lilac Hills Ranch

3800 12-001 GPA, 3810 12-001 (SP), 3100 5571 (TM), 3100 5572 (TM), 3600 12-300(REZ), 3300 12-005 (MUP), 3500 12-018 STP, HLP xx-xxx, SCH 2012061100

Environmental Log # 3910 12-02-003 (EIR)

Draft Revised EIR Public Review Period 6/12/2014 through 7/28/2014

I oppose the project on many levels lbut mostly for safety and health reasons

Chap 2.2: Air Quality

The amount of dirt that will be necessary to be moved in order to construct the project will fill the air with high particles of dust, creating a health hazard for current residents in the area and also create visual problems along county roads and possible over to major highways (395 and I-15)

Additional daily trips, 19,000 daily, emissions will greatly increase.

The project is not self-sustaining as it cannot supply jobs for all residents within it.

Chap 2.3 Traffic

West Lilac, a 2 land twisting road will not accommodate 19,000 additional daily trips without great back ups. There are no places to safely pass a slow vehicle or to allow for cross roads to access W Lilac. It will be one, big stand still.

Roundabouts need much room to be efficient and I don't see how fire engines or large trucks will negotiate such a situation. People in rural areas are not used to roundabouts and it will create havoc!

Traffic along Old 395 at Hwy 76 and I-15 is very heavy at certain times of the day - backups are a norm and would be much worse with additional traffic.

I-15 on Friday afternoons into the evening hours is backed up and to a crawl from Lawrence Welks Area into and beyond Temecula. This would not get any better with additional vehicles competing for space.

Lilac Bridge - a 2 lane bridge that cannot be widened (even if West Lilac was to be by some miracle) would become the biggest bottle neck hazard ever!

The intersection of West Lilac and Old 395 currently has stop signs omny for West Lilac - 4 way stops would be necessary (or a traffic light) which would back up traffic even more. It is difficult now to try to get out at certain times of the day

High Fire Risk Area - Again, all said above regarding Lilac .Bridge and West Lilac would not accommodate additional traffic evacuating from the east

(fires seem to come mostly from the east) People living in Valley Center would not be able to evacuate and enter onto 395 or I-15 using Gopher Canyon Road or Lilac Road due to additional traffic already evacuating.

Already this year, we had early fires, none of which were in Valley Center but the amount of people getting onto the freeway and frontage roads from San Marcos and Camp Pendleton caused hours long backups to those trying to commute home or escape those fires.

This clearly is not an area in which to add so many more homes.

And water is a problem - the state is in drought, cutbacks are being ordered, rationing planned, can we accommodate new residents under all these conditions?

It is not a matter of NIMBY it is a matter of common sense for protection of people - fresh air, water and safe roads in case of emergencies - all necessities for living.

Florence Griffis

Slovick, Mark

From: Ray Groyer <rgroyer@kzagroup.com>
Sent: Sunday, July 27, 2014 4:37 PM
To: Slovick, Mark
Subject: Proposed Lilac Ranch Development

7/27/14

Raymond Groyer

9796 Megan Terrace

Escondido, 92026

619-244-8309

Dear Mr. Slovick

I am a property owner residing in Circle R Ranch estates

In regard to the Lilac Hills Ranch DEIR I have the following specific concerns.

Note that my 1st and most important concern is one of basic safety for my family and close friends and neighbors.

1) 1) **Major impediment of fire evacuation routes.** The current homes on or off of West Lilac between the easterly most and westerly most egress and ingress to the development have only two emergency exit routes, both of which will be drastically impeded by up to 3000 additional cars exiting from this development. Our only current routes to exit to safety during a fast moving wild fire are either:

2)

1. Turning left from Running Creek Rd on to West Lilac to either exit the area via Lilac or Circle R depending on the direction of the fire.

2. Turning right from Running Creek Rd on to West Lilac to exit over the West Lilac bridge to Old Highway 395.

Additional direct exits from Lilac Hills Ranch to Old Highway 395 close to the Interstate 15 entrance would alleviate the impact of this development onto West Lilac if a wild fire evacuation required a westerly exit route. This would not help significantly if a fire jumps the Highway 15 in a easterly direction as it did in the Fallbrook Fire in May of this year or if fire comes in a northerly direction through the very high fire risk canyons from Moussa Creek. A fire scenario like this that would cut off westerly exits could be easily foreseen in this area designated as an extreme fire danger area in the county. In this very potential scenario all of us living in this locked in area with its only two exits would have to compete with up to an additional 3000 cars. During the 2003 and 2007 wild fires, the evacuation routes to the west on West Lilac over the bridge to the Old 395 crossroads were the scene of a major traffic jam. There was a slow moving line of cars backed up for more than 2 miles to the east of the West Lilac / old Highway 395 stop sign. During these increasingly severe wild fires we have very limited time to respond. This impedance of an additional 3000 cars exiting over the 2 lane west lilac bridge or through the back country on Circle R or Lilac Rd is simply illogical when considering basic fire evacuation safety. Consider that one of the original selling points to the Lilac Ranch Development on the old

Solomon property was that it would allow for ultimate fire evacuation routes to the west from Cole Grade in Valley Center. We all know that Valley Center has few evacuation routes available to it as a community. There is a scenario where this Lilac Hills Ranch development would have to exit to the east into this already evacuation stressed community. Please consider this plea for safety for my family, friends and neighbors.

3)2) Strong Objection to such significant violations of the core premises of GP2020. The necessary changes to the GP2020 to allow for this development would not be in-line with the original goals of the GP2020 to place density near town centers where there are services conveniently located to serve the needs of the population. If approval of this development results in a net increase to the GP2020 density for Valley Center, this also would be a second violation to the goals of the GP2020. It will also add a significant density increase far from basic services like groceries, gas, etc. This will increase the demand on our freeways and local streets while increasing our carbon emissions. Allowing changes to the GP2020 for this development will result in additional creep of changes to the GP2020 for these needed services.

4)3) It is also stated that sewage may have to be trucked out of the area. If a new planned development requires truck hauling of the waste stream through our community, it obviously is a poorly planned development.

The bottom line is that a development of this size should have direct access to a major thoroughfare. As organic growth on the west side of Valley Center continues over the next decade or so, its combined population growth with this development will require either a widening of West Lilac and Circle R or a doubling of the West Lilac Bridge over the Highway 15.

This is paramount in the backcountry to all for adequate wild fire evacuations. The constraints of the natural geography on West Lilac and Circle R prohibit it from ever being widened enough to handle this increased traffic. Widening of the 2 lane West Lilac bridge over Highway 15 is obviously cost prohibitive for this development. It also will be cost prohibitive for the county once the development is completed and there is no one to fund such a significant change.

In my years of participating in this process I have not run into a single person who lives within the immediate impacted area that supports this size development in this location. This is because the development, contrary to the sales pitches by the developers, will only degrade our current quality of living. Allowing this developer to modify the GP2020 for such an ill planned development will benefit only one entity, the developer. Those who currently live in the area over the next decade can expect to see their taxes increase, water costs increase, fire evacuations impeded, and property values decline. What is the charter of the San Diego Planning group, Board of Supervisors and Planning Commission? It is stated on your website that "The department analyzes privately initiated land use projects to ensure compliance with land use regulations, and advises the Board of Supervisors and Planning Commission on the projects." The bottom line is that this development clearly does not fit into the land use regulations described in GP2020. So if the GP2020 is changed for this ill planned development, maybe the website should state "The department analyzes privately initiated land use projects to ensure land use regulations can be modified to allow developers to do as they wish wherever they wish, even if the basic fire evacuation safety of those already living in the area is impacted." Please consider my concerns seriously. The well being and life and safety of my family is paramount. I feel the county has the ethical responsibility to protect the safety of the current residence of San Diego County, and not bow to the whims of the deep pocket developer community.

Ray Groyer
KaiZen Automation Group, Inc.
619-244-8309



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This email is free from viruses and malware because [avast! Antivirus](#) protection is active.

Slovick, Mark

From: Debbie Groyer <debmona28@yahoo.com>
Sent: Sunday, July 27, 2014 4:52 PM
To: Slovick, Mark
Subject: Proposed Lilac Ranch Development

Hello Mark,

We met briefly at a recent meeting and you may recall I expressed at length what I perceived to be your discomfort with the obvious harm that would be caused to our community should the proposed development come to fruition. My husband and I moved here only recently so we are not as knowledgeable regarding the continuing saga and the ways in which the plans for the development have changed over time. However, in discussions with our neighbors, it has become quite clear to us that there is inadequate mitigation for the numerous concerns that been expressed over the years by all of the residents of this area. In reality these concerns and problems could not conceivably be mitigated given the limitations presented by the nature of the area, its roadways and the already-approved plan for the area.

With that certainty, I would like to add my "ditto" to the objections raised by Jack Fox who is clearly well-versed regarding this untenable situation:

In regard to the Lilac Hills Ranch DEIR I have the following specific concerns.

Note that my 1st and most important concern is one of basic safety for my family and close friends and neighbors.

1) 1) **Major impediment of fire evacuation routes.** The current homes on or off of West Lilac between the easterly most and westerly most egress and ingress to the development have only two emergency exit routes, both of which will be drastically impeded by up to 3000 additional cars exiting from this development. Our only current routes to exit to safety during a fast moving wild fire are either:

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west lilac bridge or through the back country on Circle R or Lilac Rd is simply illogical when considering basic fire evacuation safety. Consider that one of the original selling points to the Lilac Ranch Development on the old Solomon property was that it would allow for ultimate fire evacuation routes to the west from Cole Grade in Valley Center. We all know that Valley Center has few evacuation routes available to it as a community. There is a scenario where this Lilac Hills Ranch development would have to exit to the east into this already evacuation stressed community. Please consider this plea for safety for my family, friends and neighbors.

3) 2) Strong Objection to such significant violations of the core premises of GP2020. The necessary changes to the GP2020 to allow for this development would not be in-line with the original goals of the GP2020 to place density near town centers where there are services conveniently located to serve the needs of the population. If approval of this development results in a net increase to the GP2020 density for Valley Center, this also would be a second violation to the goals of the GP2020. It will also add a significant density increase far from basic services like groceries, gas, etc. This will increase the demand on our freeways and local streets while increasing our carbon emissions. Allowing changes to the GP2020 for this development will result in additional creep of changes to the GP2020 for these needed services.

4) 3) It is also stated that sewage may have to be trucked out of the area. If a new planned development requires truck hauling of the waste stream through our community, it obviously is a poorly planned development.

The bottom line is that a development of this size should have direct access to a major thoroughfare. As organic growth on the west side of Valley Center continues over the next decade or so, its combined population growth with this development will require either a widening of West Lilac and Circle R or a doubling of the West Lilac Bridge over the Highway 15.

This is paramount in the backcountry to all for adequate wild fire evacuations. The constraints of the natural geography on West Lilac and Circle R prohibit it from ever being widened enough to handle this increased traffic. Widening of the 2 lane West Lilac bridge over Highway 15 is obviously cost prohibitive for this development. It also will be cost prohibitive for the county once the development is completed and there is no one to fund such a significant change.

In my years of participating in this process I have not run into a single person who lives within the immediate impacted area that supports this size development in this location. This is because the development, contrary to the sales pitches by the developers, will only degrade our current quality of living. Allowing this developer to modify the GP2020 for such an ill planned development will benefit only one entity, the developer. Those who currently live in the area over the next decade can expect to see their taxes increase, water costs increase, fire evacuations impeded, and property values decline. What is the charter of the San Diego Planning group, Board of Supervisors and Planning Commission? It is stated on your website that "The department analyzes privately initiated land use projects to ensure compliance with land use regulations, and advises the Board of Supervisors and Planning Commission on the projects." The bottom line is that this development clearly does not fit into the land use regulations described in GP2020. So if the GP2020 is changed for this ill planned development, maybe the website should state "The department analyzes privately initiated land use projects to ensure land use regulations can be modified to allow developers to do as they wish wherever they wish, even if the basic fire evacuation safety of those already living in the area is impacted." Please consider my concerns seriously. **The well being and life and safety of my family is paramount. I feel the county has the ethical responsibility to protect the safety of the current residence of San Diego County, and not bow to the whims of the deep pocket developer community.**

Thank you,

Debbie Groyer
9796 Megan Terrace Escondido, CA 92026
619-244-8309

Slovick, Mark

From: Hans Haas <teriik@gmail.com>
Sent: Monday, July 28, 2014 12:53 AM
To: Slovick, Mark
Subject: Lilac Hills Ranch DEIR Comment

Mark Slovick,

This letter is submitted as part of the public response to Lilac Hills Ranch DEIR.

My name is Hans Haas and I live off West Lilac Road with my wife and two children. Both my wife and I grew up in Valley Center, so when it came time to buy a home together, we knew that rural Valley Center was the place for us. Giving our children the chance to grow up in a safe, quiet, country environment like we did, is extremely important to us. That's one of the many reasons we oppose the Lilac Hills Ranch project.

First, let me thank you for your time and consideration at the recent EIR meeting. I attended the meeting and was impressed at how you and your staff handled the hostility and strong emotions that this project has inspired in our community. Everyone I spoke to was in opposition to the project, excluding the Accretive representative, naturally. In fact the project seemed to generate so much frustration and questioning that the one hour meeting seemed far to short. The increase in fire danger and the congestion of our roads seemed to dominate the discussion, which is completely understandable. Lilac Hills Ranch could mean disaster for our area when the next firestorm comes. But there are other major concerns that this massive project brings to mind.

Since Valley Center is an agricultural town, water has always been an issue worth attention. As I'm sure you know, state wide water restrictions were recently announced in response to the record drought we are experiencing. Even if you look beyond the current conditions, water costs have risen continuously in Valley Center over the years. The burden of these costs have cause many avocado and orange groves to be let go, as the farmers can't afford the water. Some have gone to well water, but the water table in Valley Center is dropping due to both over pumping and the drought. I read that Accretive plans to use well water and rain water to supply a major portion of the usable water for LHR. That is both naive and unrealistic to think that well water would be reliable enough to supply a community of 1,700+ homes and additional commercial properties. Has any study been done to verify that the ground water could supply such a community in the long term? Should the wells run dry, what is the contingency plan for supplying the community with water? How much money would it cost the rate payers in order to expand existing infrastructure to accommodate that many homes? I think this is a glaring example of how inappropriate and unsustainable this project is.

Opposition to this project is wide spread, and growing. If Accretive is allowed to move ahead with their plans, it will irreparably damage the quality of living for the residents of our community. It is a gross disregard of the intent of the GP2020 plan. One of the most appealing things about living out here is having a 2 acre minimum parcel neighborhood. To modify the GP2020 and allow for this massive development, would signal a green light for other developers to disregard the GP2020 and join Accretive in developing our countryside, at the cost of the community. I would ask that your recommend against Lilac Hills Ranch, for the reasons listed above and the many other ones that I'm sure you are receiving.

Regards,

Hans Haas
30695 Lilac Hills Ln.
Valley Center, CA

LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018
(STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT REVISED EIR PUBLIC REVIEW PERIOD
June 12, 2014 through July 28, 2014

DRAFT EIR COMMENT SHEET

Tuesday, June 17, 2014
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

This proposed development makes no sense:

A. In the event of a FIRE, how would a life-saving evacuation take place on exits grid-locked with TRAFFIC? This would pose a serious problem, especially for those in the proposed Assisted Living Center. Would the County really want to be responsible for lives lost?

B. We are in extreme drought conditions with many growers unable to WATER crops as needed. Does it make sense for the County to approve a plan that would further deplete the scarce WATER supply?

C. The SIZE of this development is absurd! A few miles north of this proposed site (at Hwy 15 & 76) there is already an approved development going in, which includes houses, stores and a college. Do we really need more congestion and drain on San Diego County resources?

(Attach additional pages as needed)

THANK YOU FOR CONSIDERING THESE CONCERNS

Darlene Hare 7-23-14
Signature Date

Darlene Hare

Print Name

9902 W. Lilac Road

Address

Escondido, CA 92026

City State Zip Code

(760) 749-6253

Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 28, 2014

LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018
(STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT REVISED EIR PUBLIC REVIEW PERIOD
June 12, 2014 through July 28, 2014

DRAFT EIR COMMENT SHEET

Tuesday, June 17, 2014
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

MAJOR CONCERNS:

1. Traffic over the bridge, on Circle R Drive, Hwy 395, & West Lilac Road.
In 2007 a motorcyclist was killed at Covey & West Lilac Road on a curve.
We already have too much traffic on these narrow, curved roads!
2. Noise pollution.
3. Water shortages. We are in a severe drought.
4. Sewer 5. Electrical 6. Light pollution.

If this monster development happens, we will have the cost of fencing around our property (which hasn't happened in our 25 years here). This would be necessary because of people pollution: coming on our property, dumping trash, etc.

There is a nearby development at Highways 15 & 76 where all the road improvements and utilities are already in place and the land is flat and more useable than our rural, hilly area.

(Attach additional pages as needed)

PHOTOS ENCLOSED

Ben E Hare 7-24-14
Signature Date

Ben E. Hare
Print Name

9902 West Lilac Road
Address

Escondido, CA 92026
City State Zip Code

(760) 749-6253
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 28, 2014

Slovick, Mark

From: Bonnie Herman <pbherman@earthlink.net>
Sent: Sunday, July 06, 2014 1:04 PM
To: Slovick, Mark
Cc: Elizabeth Bulkley
Subject: Lilac Hills EIR comment

I have been a resident of Bonsall, California for 15 years. I am concerned about the development of Lilac Hills Ranch. Like many residents in this area, I would hope that the county of San Diego sticks with it's existing General Plan and does not approve such large changes to a plan that took so many years to develop and cost a large amount of public money to complete. The County is not required to grant an amendment to it's general plan and I hope that the county will respect the hard work and planning that went into making the current General Plan and deny the amendment proposed by Lilac Hills Ranch.

I read the EIR and would like to comment on the water availability section. This section only deals with water use of the future community. It is my understanding that grading a project like this one will require an enormous amount of water to grade and compact the soil. Water trucks will be running every day. The EIR should state how much water will be required to grade this project. It is also my understanding that developers receive a construction water meter and are able to purchase water for grading at a greatly reduced price than what normal rate payers are charged for water. This rate discrepancy should also be stated in the EIR. It amounts to a negative economic impact on the existing community to have to subsidize water for a project they do not necessarily support. Existing land owners are being asked to reduce water consumption. For those involved in agriculture this also has a negative economic impact. The use of water for grading at a subsidized rate is not fair to the existing agricultural industry.

Please let me know how this issue is addressed by the applicant.

thank you,

Bonnie Herman
32260 Mountain View Road
Bonsall, CA 92003

Slovick, Mark

From: Josie Ferrer <josie.ferrer@att.net>
Sent: Sunday, July 27, 2014 10:46 PM
To: Slovick, Mark
Subject: Lilac Hills Ranch - Comment

Hello Mark,

As in the past, I am writing this note on behalf of my parents. They don't want their neighborhood to become a city which is why they chose to live north of Escondido more than 50 years ago.

Lilac road is a narrow two lane road that will not be able to support the additional vehicles that will be added if your development continues to go forward. We don't think it's a good idea for a host of reasons.

1. Traffic congestion will certainly be a problem.
2. There is nothing sustainable as it lowers the quality of life of the people who chose to live here.
3. Development interferes with the wild life. It will displace many creatures that call this area home.
4. There is nothing smart about it. It's a death trap during fire season.
5. There is nothing green about it; because perfectly good agricultural land will be used for high density dwellings.

Guadalupe and Evangelina Hernandez
Shirey Road

Slovick, Mark

From: Storrie Hockenson <clvrstorrie@gmail.com>
Sent: Friday, June 13, 2014 10:05 AM
To: Slovick, Mark
Subject: Lilac Hills Ranch

This letter is to oppose the Lilac Hills Ranch Project. We are located on Old Hwy 395, just north Circle R Drive. Major construction is going to cause a huge back-up and aggravation to this quiet area. Why build all these new homes in the area when so many projects have been left unfinished due to the state of our economy.

Thank you,
Storrie for CJ Williams

--

Storrie Hockenson
CJW Properties
Bookkeeper
(760) 214-4473

Slovick, Mark

From: Lynn Horn <lhvd2008@gmail.com>
Sent: Monday, July 28, 2014 11:32 AM
To: Slovick, Mark
Subject: Lilac Hills

Per our conversation regarding the large 75 foot semi's on West Lilac, Circle R, Lilac, Old Castle, and state highway 15.

As I mentioned my mother came face to face with a semi this last week. The semi was travelling on the wrong side of Lilac, my mother had to lock up her brakes, the semi kept coming, he locked up his brakes, burnt rubber, and jack-knifed his truck. My mother sat in her vehicle fearing for her life. The driver of the semi appeared to be lost, and not an experienced driver.

I am aware in other states roads need to be developed FIRST to handle new developments. Our roads in Valley Center cannot handle large semi's now, or in the future. I am forwarding pictures that I have taken on Circle R for the past two years showing you the trucks. Circle R is constantly full of pot holes due to the size and weight of these vehicles. The sides of the hills are hit with the tractor-trailers, and rocks fall to the road. I will continue to take pictures and keep track of these semi's.

These semi's do get lost. I have recently had two different construction workers come to my home. Both parties were using their GPS; which led them to dirt roads.

I am sure with the Lilac Hills development it will be bringing in more 75' semi's that will be getting lost in the Valley Center, Bonsall, Escondido hills.

Our roads are used for motorcycle racing on weekends. The paper is constantly filled with accidents and deaths regarding motorcycles. Our roads are used by bicyclist, and/or their teams on a daily bases.

Lilac Hills will only bring more people, more cars, more semi's. They will end up on West Lilac, Lilac, Circle R, Gopher Canyon, etc. Roads that cannot handle the abuse, roads that are too curvy, too narrow, and too dangerous. Roads where people are still driving and texting, looking at their GPS, talking on their phones. Roads that are not patrolled by highway patrol or other law enforcement agencies on a regular basis.

Yes, my mother, my husband, and myself have contacted highway patrol, Caltrans, and the county. No one to date has a solution for this problem. The county left my mother sitting on the phone.

Yes, myself and my family are against this development, but my major concerns are the roads, and the semi's; which I will be pursuing.

Pictures will be forward.

With Respect,

Lynn Horn
Valley Center, CA
760-749-02908

Slovick, Mark

From: Cannhoward <cannhoward@aol.com>
Sent: Sunday, July 27, 2014 5:07 PM
To: Slovick, Mark
Subject: Lilac Hills DEIR comments

Mark ,

Please submit this letter as part of public response to the Lilac Hills Ranch DEIR.

I have been following this since it was first taken OFF the Valley Center Update map. I attended that meeting, and many since then. I am against this development for several reasons. I will limit them to the most obvious:

1. Water resources are drying up and current residents have suffered rate hikes and conservation, letting our groves and landscaping die off. This is tolerable when all are making an effort to keep our county and agriculture and landscaping viable and alive. I am NOT willing to sacrifice this precious resource so that 1,700 more homes can flush at least 3,400 more toilets multiple times a day for eternity.

Question; How can we sustain quality of life for those of us already here in Valley Center, with our current efforts in this drought if all the additional developments are approved?

2. Fire danger and evacuation; this is obvious, and should be extremely important to any and all connected to this project. There is no safe way this can happen if Lilac Hills is approved and built.

Question: How many people have to die trying to leave the area if indeed a fire occurs and the additional 3,000 or more cars from Lilac Hills Ranch are on the road causing a traffic jam trapping all in their cars and burning alive?

Greedy developers will have profited, left the area, and will not have to suffer the after effects of this permanent destruction. They can safely watch the tragedy on their TVs in the comfort of their homes SOMEWHERE ELSE.

3. The false information given by the developers is just BS in an attempt to get approved and permitted. Then it will be sold off to another building corporation for construction (check out the mission statement on Accretive's web site) and we all know how promises made to the community are not delivered (due to cost) or radically changed. Corporations like Accretive have no genuine good intention or concern for the welfare and future of our beautiful community here.

If it's not YOU working for the county, then WHO can protect us from the destruction of projects like this? Who can we count on to stand on the side of what is right for this beautiful North County area?

I am hopeful that this project will not be approved, ever. Please recommend against Lilac Hills Ranch.

(Merriam Mountain is just across the highway, threatening the same problems all over again)

Life is hard enough...it would be encouraging to believe that the bad guys don't always get away with it.

With all sincerity,
Ann Howard
Valley Center Resident since 1992.