

Letter I10

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

Please see attached sheets.

(Attach additional pages as needed)

JOB 6/26/2014
Signature Date

JORGE BOUBION
Print Name

9746 Megan Ter
Address

Escondido, CA 92026
City State Zip Code

760-749-7036
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

LETTER

RESPONSE

Jorge Boubion
 9746 Megan Ter
 Escondido, CA 92026
 760-749-7036
 zdr2k@hotmail.com

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

Subj: Lilac Hills Ranch Development

Dear Mr. Slovick:

Lilac Hills Ranch Project is a prime example of a project benefiting special interests and is clearly not in the public interest. It would degrade the communities, it would impact in many ways including significant negative impact on the environment, exposing its residents to significant danger of fire and significant traffic congestion on West Lilac Road, Circle R and the neighboring roads.

I10-1

I oppose the Lilac Hills Ranch Development Project for the following specific reasons:

I10-2

1. This is a Rural Agriculture area and proposed changes to the zoning would have a major impact to residents who already live here and to local wildlife.

I10-3

2. Approval of this project would also increase danger to all residents due to fire. We saw recently what happened in San Elijo Hills in San Marcos during the last fire - it was a struggle to get out and put thousands of residents and first responders at a higher risk. Do we really want to have the same situation here when the Santa Ana winds come?

I10-4

I didn't see anywhere in the plan for road improvements. Does that mean the Developer is not wanting to do access road improvements? If he wants to do his project then I would think he needs to do access road improvements needed for the increase in traffic caused by his project. This is a Health and Safety concern, especially in the case of a wildfire. At a minimum, West Lilac and the I-15 interchange needs to be opened up - provide off and on ramps. West Lilac and Circle R need to be developed to 4 lane roads similar to what was done for the Hidden Meadows Developments.

I10-5

3. What happened to the newly written San Diego County General Plan? Wasn't it approved in just three years ago? August 2011? It took 12 years and in excess of \$16 million dollars but after all the time spent by the Public and money spent by the County, our county staff must have known what was best for that land. The current zoning is Rural SR-10, SR-4. It is zoned for about 110 homes. The proposal would increase the density by 1700%. The development would surely go against the General Plan! Is the County going to ignore the General Plan or will they abide by it?

I10-6

5. Water is a HUGE concern as well; seems very hypocritical that developments of this magnitude are even considered when our water needs are such an issue. Where would the water come from for this development? Agriculture? That is what we saw earlier this year with CA farmers being denied water.

I10-7

Again, I seriously oppose this development as it stands now. It should be drastically de-scoped to match the SD County plan of just 110 homes on 608 acres.

Jorge Boubion 6/26/2014

I10-1 The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. As indicated in the FEIR subchapter 2.7, project impacts related to wildfires would be significant (Impact HZ-1). Project traffic impacts are identified in FEIR subchapter 2.3, and include the identification of significant impacts to West Lilac Road (Impacts TR-5, TR-7, TR-10, and TR-23) and Circle R Drive (Impacts TR-8, and TR-26). However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

I10-2 The comment addresses general subject areas, which received extensive analysis in the FEIR. Environmental impacts to surrounding residences are addressed throughout the FEIR and local wildlife impacts are addressed in subchapter 2.5. Impacts to agricultural resources are addressed in subchapter 2.4 and Appendix F of the FEIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required.

I10-3 The comment references the "struggle to get out" of the San Elijo Hills community during a recent wildfire. It appears that the comment is attempting to draw a comparison between the San Elijo Hills community and the proposed project; however, it should be noted that it is difficult to compare fire and evacuation hazards across communities that have different topography and ingress/egress conditions. Large evacuations typically involve some level of congestion on area roadways, which is why emergency responders are conservative in making early evacuation orders to ensure safe evacuation. Wildfire hazard impacts are addressed in subchapter 2.7.2.4 and emergency response and evacuation plans are addressed in subchapter 2.7.2.3. As discussed in subchapter 2.7 of the FEIR, the Evacuation Plan provides evacuation routes, evacuation points, and implementation of a resident awareness and education program to keep future residents and employees informed about what to do if a wildfire occurs and safe at a time of evacuation.

LETTER

RESPONSE

	<p>110-4 The project includes on- and off-site roadway improvements (refer to FEIR subchapter 1.2.1.4). Access road improvements are proposed along West Lilac Road as well as Covey Lane, Rodriguez Road, and Mountain Ridge Road. Intersection signalization is proposed at Gopher Canyon Road and I-15 ramps; Highway 395 and Circle R Drive; and Highway 395 and West Lilac Road. The comment states, "...West Lilac and the I-15 interchange needs to be opened up – provide on and off ramps", it is assumed this comment is referring to the I-15 SB and NB ramps at Old Highway 395. As noted in subchapter 2.3 of the FEIR, project traffic generation does not warrant improvements to these ramps. However, a cumulative impact was identified for these ramps (Impact TR-24 and TR-25) that would be mitigated to less than significant by implementation of M-TR-8 which requires payment of TIF. Refer to Table 2.3-24 of subchapter 2.3. West Lilac Road would be improved to the current 2.2C classification from the project entrance to the intersection of Old Highway 395 with exceptions as detailed in the FEIR. As discussed in the FEIR, widening West Lilac Road to 4 lanes is not warranted based on the traffic generation, which would be mitigated through the improvement to the 2.2C classification (with exceptions). Furthermore, under the General Plan Build-out scenario with the proposed General Plan Amendment, the classification of West Lilac Road would need to be upgraded to 4 lanes to handle the increased traffic volume. However, the project proposes to add this segment of West Lilac Road to Table M-4 of the Mobility Element, which is a list of roadways that have been accepted at deficient levels of service because the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity. As a result, West Lilac Road would remain at the 2.2C classification and would not be upgraded to 4 lanes because it is a short roadway segment and adding travel lanes would result in adverse environmental impacts that are not justified by the increased traffic capacity. In addition, widening Circle R Drive is not warranted because the project traffic generation would not significantly impact this roadway as detailed in subchapter 2.3 and Appendix E of the FEIR. It is also noted that the project would be required to improve other roadways and intersections through mitigation measures M-TR-1 through M-TR-11. See FEIR, subchapter 2.3 for additional details.</p>
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LETTER

RESPONSE

	<p>I10-5 Property owners may request a General Plan Amendment pursuant to Government Code Sections 65300 et seq. Prior to the sunset of Board of Supervisors Policy I-63, in order to initiate and application to amend the General Plan, an applicant was required to process a Planned Authorized Amendment (PAA). An application to amend the General Plan was allowed to proceed by the approval of a PAA by the Planning Commission on December 17, 2010. The project includes amendments to the County General Plan Regional Land Use Element Map to change the regional category from Semi-Rural to Village, which would result in an increase in density as noted by the commenter. The project has been evaluated for consistency with General Plan Guiding Principles, Goals and Policies, and the County's Community Development Model. The FEIR includes analysis demonstrating how the project would comply with the General Plan. A General Plan consistency analysis is provided in subchapter 3.1.4 and Appendix W of the FEIR.</p> <p>I10-6 Water supply for the project would come from the Valley Center Municipal Water District (VCMWD). A Water Supply Assessment (WSA) was prepared for the project by the VCMWD (Appendix Q of the FEIR). The WSA report evaluates water supplies that are or will be available during normal, single-dry year, and multiple dry water years during a 20-year projection to meet existing demands, existing plus projected demands of the project, and future water demands served by the VCMWD. As detailed in the WSA and in subchapter 3.1.7 of the FEIR, the project's total anticipated imported water demand would be less than the project's site's existing water demand in light of water demand offsets including the use of recycled and existing groundwater. Based on the VCMWD's water supply reliability analysis contained in the 2010 Urban Water Management Plan, the WSA concludes that the VCMWD would have adequate water supply to meet and exceed expected demands for a 20-year planning horizon, including the project's water demands. In addition, the VCMWD issued an updated letter dated May 6, 2014 verifying that the conclusions of the WSA are still valid considering recent drought conditions and associated water use restrictions. This letter has been included as a cover letter to Appendix Q of the FEIR.</p> <p>I10-7 The County acknowledges your comment and opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</p>
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