

LETTER

RESPONSE

3800 12-001 (GPA), 3810 12-001 (SP), 3100 55/1 (IM),
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

Letter I18

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

- ① What justification can the county & Association offer for the change to the Regional Land Use Element map - Semi-Rural to Village a comment? I18-1
- ② San Diego County General Plan: its 10 guiding principles for development. Could you explain how this project meets these guide lines? ① The project growth has been met! ② ISIT located near existing infrastructure other than I-15? I18-2
I18-3
I18-4

(Attach additional pages as needed)

Bruce Christensen 7/28/14
Signature Date

Bruce Christensen
Print Name

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Address
Escalante CA, 92026
City State Zip Code
760-994-8338
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

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

- I18-1 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 an amendment to the General Plan, an applicant was required to process a Planned Authorized Amendment (PAA). An application to amend to 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. In addition, revisions to the Valley Center Community Plan and Bonsall Community Plan Maps are required to reflect the land use designation changes and revise text in the Bonsall and Valley Center Community Plans as needed to describe the project. A General Plan consistency analysis is provided in subchapter 3.1.4, Land Use Planning of the FEIR. In addition, a General Plan Consistency Analysis Matrix is provided in Appendix W. See Global Response: Project Consistency with General Plan Policy LU-1.2 which allows for the development of new villages.
- I18-2 Regarding General Plan Guiding Principles, all of the goals and policies of the General Plan are based upon the Guiding Principles set forth in Chapter 2 of the General Plan (General Plan, p.2-6). The FEIR analyzes whether the project meets such principles by its analysis of the appropriate policies that implement those principles throughout each of the subchapters of the FEIR and in Appendix W to the FEIR. Please refer also to the Global Response: General Plan Amendment CEQA Impacts Analysis.
- I18-3 The General Plan Guiding Principle, "Support a reasonable share of projected regional population growth" is achieved by overall implementation of the General Plan and the specific housing targets established by the Housing Element. As the project would not impede implementation of the General Plan or meeting housing targets, the project is consistent with this principle.
- I18-4 The project is consistent with the General Plan Guiding Principle, "Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development." as exemplified by the Specific Plan Goals and policies that support compact development and a walkable community. Refer to the Specific Plan, Part II for detailed Specific Plan Goals and Policies that align with this General Plan Guiding Principle.

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<p style="text-align: right;">2/8</p> <p>③ Does it reinforce the vitality, local economy & character of the area? (it's agricultural & semi-rural) where are the recreational opportunities? (other than Parks & Trails)</p> <p>④ Promotes environmental stewardship & uniquely character? How does managing our 4-million cys of dirt protect the natural resources & habitat?</p> <p>⑤ How does LTR account for any physical constraints and hazards of the land?</p> <p>⑥ where is the support for a multi-modal transportation?</p> <p>⑦ How does LTR reduce greenhouse gas emissions and reduce its effect on climate change?</p> <p>⑧ How does LTR preserve ^{the} agriculture component and preserve open space?</p> <p>⑨ How does LTR minimize costs of infrastructure and services?</p> <p>⑩ How does and have Accretive strive for a consensus of the interests of the area residents? I've tried to attend 2 different accretive gathering/events</p>		<p>118-5 The project is consistent with the General Plan Guiding Principle, "Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities" because it incorporates various design elements intended to ensure consistency with the Bonsall and Valley Center Community Plans. For example, the Specific Plan incorporates landscape and architectural design standards and guidelines that provide for design elements that would enhance existing community character.</p> <p>118-6 The project incorporates a variety of parks and trails that enhance the recreational opportunities in the community. Refer to Figure 20 of the Specific Plan for the Community Trail Plan. Part III of the Specific Plan provides details of the proposed public and private parks. Other recreational amenities may include a private gym/recreation center within Phase 3 and sports fields within phases 3 and 5. Refer to Figure 1-4a of the Specific Plan.</p> <p>118-7 The project demonstrates consistency with the General Plan Guiding Principle, "Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance" through the preservation of 104.1 acres of biological open space and through additional off-site biological resource preservation. The volume of earth movement required to implement the project does not protect natural resources and habitat; however, all grading would be completed in accordance with County requirements and slopes would ultimately landscaped.</p> <p>118-8 The project accounts for the physical constraints and hazards of the land through its project design. The project is designed to avoid sensitive biological resources and 18.4 of the 20 acres of steep slopes on-site are avoided. Hazards are addressed through implementation of appropriate mitigation addressing fire hazards (M-HZ-1) and implementation of the project's Fire Protection Plan and Emergency Response Plan (Appendices J and K). In addition, the project would comply with all applicable regulatory requirements including preparation of a Risk Management Plan for the Water Reclamation Facility and preparation of a soil management plan to ensure proper management of contaminated soils and debris during grading.</p>
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	<p>118-9 The project supports multi-modal transportation through the incorporation of a system of pedestrian ways, multi-modal trails and bicycle paths in the design of the project. The project establishes a Village that is compact and configured to encourage residents to walk to commercial and civic uses. Residential and mixed-use uses are located adjacent to the Town Center, central Neighborhood Center, school site and a County park. This will encourage residents to walk to these public areas. Traffic-calming mechanisms such as roundabouts and/or couplets will further slow traffic through the community, encouraging non-vehicular travel. In addition, an area for a transit stop has been identified within the Town Center that would be provided to the NCTDB when the district determines it is need. The project also includes a Community Park and Ride facility within Phase 1 and a Transportation Demand Management Program that includes such measures as van services to connect the Community with the planned NCTDB transit stop located at the intersection of I-15 and SR-76. Interim transit services would be provided upon build-out of the community and would terminate when a transit linkage is proposed by the local transit district.</p> <p>118-10 The FEIR includes a detailed analysis of the project's impact on climate change in subchapter 3.1.2 of the FEIR. In addition, refer to the Global Response: Project Impacts on Long-Term GHG Reduction Goals and Mandates.</p> <p>118-11 Refer to subchapter 2.4 and Appendix F of the FEIR for analysis of impacts and mitigation for agricultural resource impacts. Subchapter 2.5 and Appendix G provide details about the biological resource impacts of the project and associated mitigation.</p> <p>118-12 The project would fund all required infrastructure improvements required for the project and would not result in an increase in the public cost of infrastructure.</p> <p>118-13 The project has strived for consensus by providing multiple opportunities for the neighboring property owners and community members to voice their concerns about the project. The project was circulated for public review twice, each circulation providing a 45-day public comment period. In addition, the project will be presented at the Planning Commission and Board of Supervisors meetings, where the public will have an opportunity to express any concerns.</p>
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<p style="text-align: right;">3/8</p> <p>Ad have been denied entrance to both, because it was a invitation only event. I've asked ad have resp to attend these events to 100 avail.</p>		<p>118-14 The project is not required to be LEED-ND certified; rather it is designed to meet equivalent standards as LEED-ND.</p>
<p>(12) How is this project address the requirements for LEED-ND? And does it?</p>	118-13 cont.	<p>118-15 CEQA requires the disclosure of environmental impacts to the public. Potential Traffic and Transportation impacts are disclosed in subchapter 2.3 of the FEIR. The analysis is based on the Traffic Impact Study (TIS) which is included as Appendix E of the FEIR. Table S-1 in the Executive Summary provides a summary of the traffic impacts that would result from the project, applicable mitigation measures, and identifies impacts that would remain significant and unavoidable.</p>
<p>(13) How is this project compliant with CEQA regulations as Traffic is concerned?</p>	118-14	<p>118-16 Conformance with the Community Development Model is discussed in Attachment A of Appendix W, General Plan Consistency Analysis. As discussed in this attachment, "The residential-oriented neighborhoods will radiate out from the Town Center to the project perimeter with the largest, ranchette-styled lots feathering the edges." The highest density residential uses would be located in the Town Center and Neighborhood Center, where services and amenities would be available. Lower density residential would occur as distance from these centers increases. Looking broadly at the application of the Community Development Model and the 'feathering' concept to this area, the project achieves the intent of the model by maximizing compact development within its boundaries, with the highest densities occurring in proximity to the proposed Town Center and Neighborhood Centers. Development surrounding the project site, which is outside of the control of the developer, generally has lower densities than what is proposed within the project boundaries. This land use pattern is consistent with the General Plan Community Development Model, with the lowest densities occurring in the semi-rural and rural densities surrounding the project site.</p>
<p>(14) As per SDCGD there should be a Feathering of residential densities is there any? I live on W. 11th Rd on 1.5 AC. and with in 100 1/2 miles there is going to be over 100 homes with lots as small as .10 AC. is this considered Feathering?</p>	118-15	<p>118-17 The project has been designed to be equivalent to LEED-ND. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2.</p>
<p>(15) Since compliance with LEED-ND stds are required. How has Accutone met these stds?</p>	118-16	<p>118-18 This comment does not raise an environmental issue within the meaning of CEQA. Furthermore, there is no General Plan policy that requires the project to be "smart growth." For additional details on</p>
<p>(16) THA calls it →</p>		

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<p style="text-align: right;">4/8</p> <p>16) The county & Accounting call this project "SMART Growth". The main premise is to lower Auto dependency and reduce greenhouse effects on the environment. Sandra states the county's Ave. miles/trip is 5.8 miles. The closest grocery store is 8 miles, The closest Hospital (Fallbrook) is 12 miles and 20 mins away. How is this Smart Growth? ↑ Facts</p>	<p>118-18 (cont.) project consistency with the General Plan and how the project is equivalent to LEED-ND standards, refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W. See also FEIR subchapter 3.1.2 discussing the project's greenhouse gas emissions.</p> <p>118-19 The project meets the requirements of General Plan Policy LU-1.2 as detailed in the Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>As discussed in Attachment A of Appendix W, the project conforms to the Community Development Model and proposes to change the existing Semi-Rural Regional Category to Village, with a Village Land Use Designation (VR-2.9), under the General Plan.</p>
<p>17) LEED-ND 2009 states the max. size of a village is 320 ac. How does LHR call it's self a village?</p>	<p>118-20 The availability and location of employment for future residents is an economic issue that is not generally addressed under CEQA, except in the context of expected vehicular trip generation and greenhouse gas (GHG) emission potential. For purposes of the GHG analysis provided in Appendix O, trip lengths used in the modeling range from 6.6 to 16.8 miles, with trips associated with work and business traveling greater distances than shopping and other non-business related trips. On average, these trip lengths would account for occupants traveling to major employment centers around the County, including to the cities of Escondido, San Marcos, and San Diego, for example. In addition, the project includes three commercial nodes within the development that would be within one-half mile walking distance from residential areas of the project.</p>
<p>18) Where are the closest employment centers for the 5,000+ residents of LHR?</p>	<p>118-21 There are four potential permanent wastewater treatment system scenarios which could serve the project as detailed and analyzed in the FEIR Chapter 1.0, Project Description and subchapter 3.1.7, Utilities and Service Systems. Any of these four scenarios could be implemented at the discretion of the Valley Center Municipal Water District (VCMWD). The four wastewater treatment options include the following: (1) on-site WRF with solids treatment; (2) on-site scalping WRF without solids treatment; (3) Lower Moosa Canyon WRF alternative; and (4) on-site WRF without solids treatment for a portion</p>
<p>19) Where is the wastewater infrastructure that's needed? Will its planned wastewater plan be completed before homes being built?</p>	

118-21 (cont.)

of the project. A Major Use Permit (MUP) is being processed for an on-site WRF, concurrent with the FEIR, which could accommodate all of the project's wastewater treatment needs. The ultimate treatment alternative for project-generated wastewater will be determined by the VCMWD prior to approval of the final map for Phase 1, which would be one of the options listed above. Prior to approval of each final map, the Project is required to construct wastewater facilities that have the capacity to accommodate the projects projected wastewater generation. Each option's capacity and conceptual layout are detailed in the Wastewater Alternative Report (see Appendix S) and in subchapter 3.1.7 of the FEIR. Figures 3-1 and 3-2 describe the Phasing Plan for providing wastewater treatment with each phase of development.

Figure 1-4 in the FEIR shows the location of the proposed Wastewater Reclamation Facility (WRF) on 2.4 acres in the southwestern portion of the site. An 8.1-acre wet weather storage area would also be constructed. If the full WRF is authorized and constructed, the wastewater generated by the project would be treated on-site. Wastewater would be collected in gravity sewers; with up to four wastewater lift stations required to pump wastewater to the main gravity flow collection system. Figures 3-1, 3-2, and 3-3, in Chapter 3.0 of the FEIR show the proposed on-site wastewater collection system. Appendix S of the FEIR provides the three possible alternative routes for wastewater transmission lines to connect to the Lower Moosa WRF. Alternate routes for sewer lines include an alignment along Covey Lane, West Lilac Road and Circle R Road. FEIR subchapters 1.2.1.7 and 3.1.7.2 describe the alternative sewer line routes that were analyzed in the FEIR.

Improvements necessary to serve the project will be implemented at the discretion of the VCMWD and would be phased according to the Phasing discussion on page 2-5 of the Wastewater Management Plan, which states: "Generally, the project will phase from north to south. Since the existing sewer treatment disposal facilities are south of the project, a temporary force main will be needed through the project to make a connection to the Moosa WRF. If the Moosa WRF is not used for the initial phases of the project, this temporary force main will need

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<p style="text-align: right;">5/8</p> <p>(20) Does Accretive own the Easements For Sewer?</p>	<p>118-22</p>	<p>118-21 (cont.) to feed the on-site treatment plant location. In order to accommodate the phasing for the project, two temporary pump stations will also be required. Table 3-1 provides a summary of the anticipated wastewater flows from each phase of the project.”</p> <p>Trucking for the first phase may also be utilized for the first 100 units.</p>
<p>(21) LEED-ND requires Public Transit Services where are they in writing?</p>	<p>118-23</p>	<p>118-22 While easement rights is not an environmental issue within the meaning of CEQA, a detailed analysis of the project’s easement rights has been prepared and is included in the introduction to these responses to comments as Global Response: Off-site Improvements – Environmental Analysis and Easement Summary Table. As detailed in the table, the project has all easement rights necessary to construct either of the three wastewater options.</p>
<p>(22) where will Park@Ride/rideshare parking located?</p>	<p>118-24</p>	<p>118-23 The project is not required to be LEED-ND certified; rather the project has been designed to be equivalent to LEED-ND. The project has been designed to accommodate a public transit by providing for bus stops within the Town Center in addition to bicycle and pedestrian features. A location has been reserved within the project site for a future transit stop if the North County Transit District decides to provide service. An interim private transit service would be provided that connects to public transit. The interim transit service would operate on demand until public transportation is proposed by the local transit district. This information is included in subchapter 2.3.2.4 of the FEIR.</p>
<p>(23) How will downgrading of W. Litch Rd from class 212C to class 212F help Traffic Flow?</p>	<p>118-25</p>	<p>118-24 Park-and-ride facilities are available at the intersection of Old Highway 395 and Gopher Canyon Road, approximately 4.7 miles from the northerly project entrance. In addition, a private ride sharing facility will be allowed on the designated HOA lot in Phase 1, shown on Figure 130 of the Specific Plan. This facility could provide convenient parking facilities for residents and the public for trips outside the community, including trips to the public park-and-ride mentioned above. The facility could also include secured parking for bicycles.</p>
<p>(24) Will Accretive mitigate The Compromise in Safety & Quality of Life in Reducing the mobility Elements of the roads?</p>	<p>118-26</p>	<p>118-27 will The County be Liable for these safety issues?</p>
<p>(26) How can the County & Accretive not call this Leap Frog Development Please Explain?</p>	<p>118-28</p>	<p>118-28</p>

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	<p>118-25 The County Mobility Element currently classifies West Lilac Road between Old Highway 395 and Covey Lane as a Light Collector with intermittent turn lanes (2.2C). The project proposes an amendment to the Mobility Element to downgrade the classification of West Lilac Road from 2.2C to 2.2F from Main Street, east to Road 3. The downgrade is not intended to help traffic flow, rather to account for physical constraints and environmental impacts that would occur if the road was built to the existing Mobility Element classification. The Board of Supervisors may choose to keep the road at a 2.2C classification and impacts associated with this option are analyzed as part of the General Plan Consistent Alternative in Chapter 4.0. As detailed in the Traffic Study, this classification would also accommodate projected trips of the project plus cumulative projects while maintaining LOS A (see Table 6.2 of Appendix E).</p> <p>118-26 Only one road segment, West Lilac Road from Main Street to Road 3, is proposed for a Mobility Element classification downgrade; however, the Board of Supervisors will ultimately decide whether to downgrade this segment or to keep it at the existing 2.2C classification. The 2.2F classification is proposed to minimize impacts on existing adjacent homes. In addition, significant transportation impacts would not occur along this segment as a result of the proposed project and/or the classification change. As a result, no associated safety or quality of life impacts have been identified and would not be expected to occur as a result of the Mobility Element classification change. Both the 2.2C and 2.2F standards require two 12-foot travel ways and two 12-foot-wide parkways (i.e., the area between the curb and the edge of the right-of-way). The 2.2F standard requires 2-foot-wide shoulders while the 2.2C requires shoulders that are 8 feet wide. A road built to 2.2F standards requires a narrower right-of-way, which would reduce the impacts of road widening on the existing adjacent homes.</p> <p>118-27 No safety issues are expected to result from the proposed Mobility Element classification change along West Lilac Road. The main difference between a 2.2C and 2.2F is a reduced shoulder width requirement for the 2.2F classification. As the County would only approve a road design that meets all safety standards, there would be no issue with increased liability for the County. Additionally, traffic conditions with project build-out plus cumulative projects along the segment proposed for a downgrade are projected to function at LOS A.</p>
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	<p>118-28 It is understood that the commenter is referring to leapfrog development in the context of General Plan Policy LU-1.2. The project is consistent with the County's General Plan and more specifically with the Community Development Model</p> <p>For additional discussion on project compliance with General Plan Policy LU-1.2, refer to Global Response: Project Consistency with General Plan Policy LU-1.2.</p>
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<p>48 (27) What are the recycling facility operations going to be?</p>	<p>118-29</p>	<p>118-29 As described in Section II of the Specific Plan, the Recycling Facility is proposed in the C34 zone, subject to approval of a Site Plan. Figure 61 of the Specific Plan provides an example of the size, scale and architectural style of the structure that is anticipated. As stated in the Specific Plan, "The structure will include the office functions for the site as well as storage for any equipment or materials that need to be secured. The facility will include temporary roll-off bins or storage containers where recyclables domestic hazardous waste material generated within the Community and/ or green waste generated from project residents may be consolidated for efficient off-site processing. If economically viable, a buy-back center may be opened at this location for residents to redeem CRV containers. Additionally, use of this facility will significantly reduce off-site trash truck trips to regional waste system facilities. This facility may be operated by an entity licensed as necessary and the facility will also have the necessary operating permits."</p>
<p>(28) Accutrip is asking for road s/bly modifications to downsize (see question 23) roads & right A ways if this is the case, why should my lot size need to be reduced to make the road wider? why not widen W. Lilac rd on the side?</p>	<p>118-30</p>	<p>118-30 The project includes 10 exception requests to the County's adopted Public and Private Road Standards. The exception requests would not result in a downsizing of existing road conditions; rather they would allow various modifications to the design standards associated with the road classification. Six of the requested road standard exceptions would affect West Lilac Road. Modifications 1-3 affect West Lilac Road from the Old Highway 395 intersection east to the project's western boundary and would maintain two travel lanes within a modified cross section that would reduce grading on along the frontage, and to the west of the project site. Modifications 4-6 extend from the westerly to the easterly proposed roundabouts and would allow transition back to the existing paving from the roundabouts, slow traffic, and maintain the existing centerline of West Lilac Road, reducing impacts on property owners north of West Lilac Road.</p>
<p>(29) Does Accutrip own the Right-A-way to widen W. Lilac rd (my home) 9168 W. Lilac rd? How will the road (right A way) be obtained? IF Eminent Domain is used will my Landscaping & Drive way be replaced as it is?</p>	<p>118-31</p>	<p>The project does include improvements along West Lilac Road along the project frontage, and west of the project site, with right-of-way dedications and improvements (2-foot roadway widening, berm, shoulder & type "D" pathway) occurring on the project/southern side of the roadway. Detailed improvements showing plan view and cross sections are available on page 1 of the implementing Tentative Map. The typical section shown on the TM for a 2.2F Light Collector with a Reduced Shoulder does not show improvements on the north side of the road, adjacent to the commenter's property. As a result, it is not</p>
<p>(30) How will the loss of plant & wild-life habitat be mitigated?</p>	<p>118-32</p>	<p>The project does include improvements along West Lilac Road along the project frontage, and west of the project site, with right-of-way dedications and improvements (2-foot roadway widening, berm, shoulder & type "D" pathway) occurring on the project/southern side of the roadway. Detailed improvements showing plan view and cross sections are available on page 1 of the implementing Tentative Map. The typical section shown on the TM for a 2.2F Light Collector with a Reduced Shoulder does not show improvements on the north side of the road, adjacent to the commenter's property. As a result, it is not</p>

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	<p>118-30 (cont.) anticipated that the commenter’s lot size would need to be reduced to allow for road improvements along this segment. However, the FEIR includes a Road Design Alternative in subchapter 4.8 which analyzes impacts of the project if built to the existing Mobility Element Classification, without any exceptions to Road Standards. For details of all improvements that could affect surrounding properties through right-of-way and/or easements, please refer to Global Response: Off-site Improvements - Environmental Analysis and Easement Summary Table.</p> <p>118-31 As discussed above, roadway improvements are proposed on the south side of the roadway, adjacent to the project site. Should land be required for road improvements outside the existing right-of-way (for example, under the Road Design Alternative), the developer would be required to obtain additional right-of-way for road improvements. If right-of-way could not be obtained, then they could request the Board of Supervisors to assist in obtaining the right-of-way (Eminent Domain) pursuant to Board Policy J-33. Under this scenario, the Board of Supervisors would decide whether to initiate proceedings to acquire additional easements from property owners. All costs associated with eminent domain proceedings would be the responsibility of the developer. Should that be the case, land is taken for road improvements which would become part of the public road (in the case of West Lilac Road), it would be the developers responsibility to relocate the driveway access.</p> <p>118-32 Details of the biological resource impacts that would result from the project and the mitigation measures that would be implemented to reduce impacts to less than significant are provided in subchapter 2.5 and Appendix G of the FEIR. For example, biological resource mitigation includes requirements for preservation of sensitive habitat either through, within the on-site open space easement, or off-site within the draft PAMA potion of the draft North County MSCP in Valley Center or adjacent communities, and the preparation of a Resource Management Plan to address any restoration, enhancement and maintenance of open space. In addition, wetland creation is required as a mitigation measure of the project to ensure there is no net loss of wetlands. The project design incorporates 104 acres of open space for resource preservation.</p>
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7/8

(31) How & who will improve & provide Traffic Safety?

The Traffic report states 1,150 peak vehicles an hour and most of this will be on I-15 how can old 395 NB off ramp handle that many cars?

118-33

(32) with Accutue widening W. Lilac rd to 4 lanes on both sides of Lilac bridge how will that not cause a major bottle neck?

118-34

(33) Since W. Lilac rd doesn't have side walks going west toward Acad to Sullivan School will the increased student population get to school with out parents driving them?

118-35

Does it incure more traffic & gas house gas?



118-33 Traffic safety is detailed in subchapter 2.3.2.3 (Issue 2: Transportation Hazard) of the FEIR. As discussed therein, the road network design for the project would provide adequate ingress and egress for residents as well as emergency access, safe trail system, and conform to Goal M-4 of the General Plan Mobility Element. Therefore, impacts associated with transportation hazards would be less than significant. With respect to I-15/Old Highway 395 ramps, the FEIR calls out Impacts TR-24 and TR-25 identifying cumulative impacts to the I-15 SB Ramps/Old Highway 395 and I-15 NB Ramps/Old Highway 395 intersections, respectively. The project will implement mitigation measure M-TR-8, which requires the applicant to participate in the TIF Program. The TIF Program was specifically designed to address cumulative impacts. The TIF Program includes road improvements required to provide adequate circulation through Year 2030. Required improvements are specified and funds are collected from projects to pay for the road improvements. Since the TIF Program was designed to address cumulative traffic impacts, participation in the TIF Program constitutes effective and adequate mitigation for cumulative traffic impacts. These identified roadway segments are included in the TIF and payment of the TIF fees would mitigate the cumulative impact. Therefore, payment of TIF fees would reduce these cumulative impacts to less than significant. These fees and all roadway improvements required of the project would be provided/ funded by the developer.

118-34 To reduce significant impacts along West Lilac Road between Old Highway 395 and main Street, the project will be required to improve this road segment to meet the General Plan Mobility Element classification of 2.2C, subject to exceptions as approved by the County (M-TR-4). The 2.2C classification includes two travel lanes, not four as stated by the commenter. As detailed in the Traffic Study (Appendix E) and subchapter 2.3 of the FEIR, the impacts along this segment of West Lilac Road from Old Highway 395 to Main Street will be mitigated through implementation of M-TR-4, as stated above. Additional improvements at Old Highway 395 and West Lilac Road include a signalized intersection and a left-turn lane at the westbound West Lilac Road approach. As a result of these measures, and as demonstrated in the Traffic Study, significant traffic congestion is not expected at the I-15 bridge crossing.

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12:25 PM

098-009

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IF The zoning is changed for more dense housing, will I be rezoned so I can build multi units on my 1.40. acc.??

118-36

Thanks. I'm looking forward to your answers

Rene Chuter

118-35 Sullivan Middle School is an existing school operated by the Bonsall Unified School District, located approximately two miles west of the project site, west of Interstate 15. The project would not affect the commute modes (e.g., student transport via car, bicycle, walking, etc.) that occur for students attending this school, as West Lilac Road would continue to operate at an acceptable LOS with project build-out. Students who walk or bicycle to school would not be prevented from walking or bicycling to school once the project and associated improvements are constructed. Project improvements and pathways that would be constructed as part of Lilac Hills Ranch may improve conditions for pedestrians and bicyclists, particularly along the project frontage. The FEIR already accounts for all trips, as the residential trip generation rates provided in the SANDAG's Guide to Vehicular Traffic Generation Rates for the San Diego Region (SANDAG, April 2002) already account for all trip purposes including home-work, home-shopping, home-school, etc.

118-36 Rezoning is proposed throughout the project site as shown in Figure 1-3 of the FEIR. No property outside the boundaries of the project is proposed to be changed as part of the application. The commenter's property is not proposed to be rezoned as part of this project.