

## LETTER

## RESPONSE

## Letter I25

**From:** Greg Duchnak [<mailto:duchnak@earthlink.net>]  
**Sent:** Saturday, July 26, 2014 1:25 PM  
**To:** Slovick, Mark  
**Subject:** Response to Lilac Hills Ranch DEIR

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9723 Running Creek Lane  
Escondido, California 92026

July 26<sup>th</sup>, 2014

Mark Slovick,

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

Background – For 20 years my family and I have lived off of Running Creek Rd. We are less than 1 mile from various entrances to this proposed high density development. We have had several large developments proposed for our immediate area over the 20 years including a 2 acre minimum, golf course community on Lilac Ranch, a large high density development on Lilac Ranch, and now Lilac Hills Ranch. We have seen many presentations from the proposing developers selling the various benefits the new development would provide to the surrounding community. I have attended many community planning meeting as well as information meetings presented by the various developments to keep abreast of what was being proposed and the community response. I also have followed the long and difficult process of the county developing the GP2020. I also have watched the valley center community planning board develop a center city with high density developments that allow for doubling its growth over the next several decades. This Valley Center plan with growth targeted for the town center meets the objectives of the current GP2020. The Lilac Hills Ranch does not, and will require significant modification to GP2020. If this ill proposed plan with very poor circulation is approved it will set a very dangerous precedent and effectively negate the value of the GP2020.

In regard to the Lilac Hills Ranch DEIR I have the following specific concerns. Note that my 1<sup>st</sup> and most important concern is one of basic safety for my family and close friends and neighbors.

1) **Major impedance for 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:

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 an 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

I25-1

I25-2

I25-1 This comment is an introduction to comments that follow. The general comments provided are further detailed in the remainder of the letter. The comment will be provided to the decision makers for consideration prior to making a decision on the proposed project.

I25-2 The County acknowledges this comment and concern expressed by the commenter related to fire evacuation. As detailed in FEIR subchapter 2.7.2.4, an Evacuation Plan was prepared for the project (see Appendix K). The Evacuation Plan details measures for the evacuation of residents within the project. Main Street would be constructed through the project site, off West Lilac Road, and would connect with existing evacuation routes providing access to the north, south, east, and west. The connector roadways are Old Highway 395, Circle R Drive, and I-15. Additional evacuation access to the aforementioned roadways would be available from within the project site via Covey Lane and at Mountain Ridge Road to Circle R Drive. These routes would not conflict with any current proposals within the Draft Valley Center Evacuation Plan. The key evacuation routes for the project are detailed below:

- Northwest Access via West Lilac Road - which provides access to the west and the east.
- Northeast Access to West Lilac Road - Ingress and Egress Point on northeast side of development which provides secondary access to West Lilac Road.
- Covey Lane - which provides a secondary access to West Lilac Road on the east side of the development.
- Mountain Ridge Road - which provides a direct southerly route to Circle R Drive.

The evacuation plan states that Covey Lane and Mountain Ridge Road are designated as emergency egress roadways for emergency evacuation only. The emergency access roads will be gated and the gates will be operated in a manner approved by the Deer Springs Fire Protection. In addition, the FPP identifies Mountain Ridge Road as "additional" emergency ingress/egress road.

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<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Sincerely,</p> <p>Gregory M Duchnak and Laura S Duchnak</p>	<p>I25-2 cont.</p> <p>I25-3</p> <p>I25-4</p> <p>I25-5</p> <p>I25-6</p> <p>I25-2 (cont.)</p> <p>Significant knowledge has been gained and improvements have been implemented by regional agencies responsible for evacuation planning and emergency response since the 2003 and 2007 wildfires. The County OES, working in coordination with the fire Incident Command and law enforcement agencies are aware of the various threatened areas, their populations, and road evacuation routes and capacities. The ongoing planning and training for evacuations (a key component of the Incident Command System) ensures timely and well administered evacuations in San Diego County and other counties throughout the state. This is done using a very conservative approach to evacuation, ordering early evacuations based on the community attributes mentioned above. Roads may be congested, but large numbers of people are moved out of the way of an advancing fire early, allowing fire protection personnel to move in early and establish positions.</p> <p>A contingency plan is one of the immediate priorities for developments by an Incident Command when a wildfire event occurs in a wildland-urban interface area. These plans will be integrated and coordinated within the Incident Command System for the evacuation of all residents in the area.</p> <p>In the event a wildfire occurs in the immediate vicinity with little to no time to evacuate, the Incident Command will make a determination/decision if Temporary Safe Refuge (TSR) for residents would be appropriate or warranted. TSR is a concept when early evacuation is not possible due to the nature and proximity of the fire or the escape route has been compromised. This would be a decision by Incident Command on-site based on the nature of and location of the fire. Within the fire emergency community and fire jurisdictions, it is not acceptable to plan shelter-in-place for a community. However, with the ignition-resistant construction, structural fire code requirements, and irrigated and managed park areas, TSR could provide protection to residents within the project site, if conditions warrant this option as determined by Incident Command.</p>
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	<p>I25-2 (cont.)</p> <p>There were fatalities directly related to the Cedar Fire of 2003, but this was not due to the congested roads during these massive evacuation events. The record indicates that the fatalities were a result of evacuations from back country areas when smoke and nighttime darkness caused the evacuating residents to become disoriented and confused. This prevented residents in these areas from evacuating in a safe, direct route. As noted above, with today's evacuation planning, coordination among agencies and early movement of people in high risk areas, the risk of serious injury or worse is greatly reduced.</p> <p>In addition, enhanced fire-resistive construction measures shall be implemented for structures within the project site. Vents and skylights on structures facing natural fuel and open space areas would be eliminated to reduce the potential for wildfire to spread to structures near fuel sources.</p>
	<p>I25-3 Project consistency with the General Plan is discussed in subchapter 3.1.4 and in Appendix W of the FEIR. The intent of the Community Development Model is to prevent leapfrog development from occurring and is implemented through Policy LU-1.2. Refer to Global Response: Project Consistency with General Plan Policy LU 1.2, included with these responses to comments, for details of project compliance with this policy. The carbon emissions associated with the project are evaluated in Chapter 3.0, subchapter 3.1.2 and in Appendix O. This analysis provides a detailed account of the project's anticipated GHG emissions and identifies the various measures that would be implemented by the project to minimize significant impacts related to GHG emissions. The analysis demonstrates that impacts related to project GHG emissions would be less than significant.</p>
	<p>I25-4 The FEIR considers four potential permanent wastewater treatment system scenarios to serve the project. Any of these four scenarios could be implemented at the discretion of the VCMWD. The four wastewater treatment options include the following: (1) on-site Wastewater Reclamation Facility (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 of the project. The Valley Center Municipal Water District (VCMWD) Board approved Preliminary Concept Approval to the Project June 3, 2013. Part of the approval outlines a plan to providing wastewater</p>

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## I25-4 (cont.)

treatment whereby the initial phase of the project would expand the Lower Moosa facility and a smaller on-site facility would be constructed based on the needs of the project and the Lower Moosa WRF service area. As stated in the Project Description (Chapter 1.0), if one of the on-site wastewater treatment scenarios is selected, the project would require temporary trucking of sewage during the initial phases of the project. This is necessary because a minimum wastewater flow is needed to operate an on-site WRF. For an on-site permanent WRF, trucking would be required for up to the first 100 homes (approximately three truck trips per day) to allow for a sufficient minimum flow to operate the facility. For a smaller on-site interim WRF, trucking would be required until as few as 25 homes are occupied. In either case, as soon as sufficient flows are available, trucking operators would cease.

I25-5 An analysis of the capacity of the roads to accommodate the project's anticipated trip generation, in addition to vehicle trips associated with cumulative projects in the area and build-out of the General Plan is provided in subchapter 2.3 and in Appendix E of the FEIR. This analysis demonstrated that the project would result in significant direct and cumulative impacts to the segment of West Lilac Road from Old Highway 395 to Main Street. The project would be conditioned to require improvements along West Lilac Road between Old Highway 395 and Main Street to meet the General Plan Mobility Element classification of 2.2C, subject to exceptions as approved by the County (M-TR-4). None of the exception requests for this segment of West Lilac Road would affect roadway capacity because they do not modify the required width of travel lanes. 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. The project also includes improvements to East Vista Way/Gopher Canyon Road and traffic signals at Gopher Canyon Road/I-15 ramps. The project does not include roadway improvements to Circle R Drive, as there would be limited vehicle trips on this road due to gates at Mountain Ridge Road that would limit regular access to Circle R Drive from future residents of the project. An intersection improvement (signalization) is proposed at Circle R Drive and Old Highway 395. As detailed within the FEIR, the proposed improvements to West Lilac Road, the major road (light collector) providing access from the project to I-15, would be adequate to serve the project and future growth.

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	<p>I25-5 (cont.)</p> <p>Chapter 4.0 of the FEIR, subchapter 4.8.1.2, analyzes the Road Design Alternative 2: West Lilac Road Over I-15 Bridge. This alternative analyzes the construction of West Lilac Road over the I-15 bridge as a County Light Collector road 2.2C, without any design exceptions. Improvements to 2.2C standards without exceptions would require a wider bridge. However, as widening the bridge is not likely feasible due to engineering constraints, a second bridge would need to be constructed to meet the 2.2C standards. This alternative analysis recognizes that construction of a second bridge would likely be infeasible due to cost. The analysis also shows that improving the bridge to 2.2C standards, without exceptions, would result in additional impacts with either the widening option or the second bridge option.</p> <p>Regarding the comment about evacuation, the FEIR includes an Evacuation Plan (Appendix K) which includes multiple components intended to create an orderly and safe evacuation of the project site in time of emergency. The analysis in subchapter 2.7 of the FEIR concluded that implementation of the specific measures contained in the Evacuation Plan would keep future residents and employees safe during evacuation and roads would be adequate to allow safe evacuation. Also see response to comment I25-2 above.</p> <p>I25-6 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 Plan Amendment Authorization (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. See response to comment I4-1 and I5-3 for General Plan consistency and community character, respectively. The remainder of this comment expresses the opinion of the commenter and reiterates issues that are responded to in detail in the previous comments. 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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