

LETTER

RESPONSE

Letter I29a

July 28, 2014

To: Mark Slovick, San Diego County Project Manager

Project: Lilac Hills Ranch

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 3600 12-003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (MUP), 3500 12-017 (STP), 3500 12-018 (STP)

Dear Mr. Slovick,

I have questions and concerns regarding the Lilac Hills Ranch development and the impact of the road improvements on Mountain Ridge in the event the road is improved to Public Road Standards. They are as follows:

1) Currently due to the contour of the terrain where Megan Terrace is located and due to the elevations decreasing heading west, during cold weather, cold air tends to "drain" to the west down the valley. Currently during times of frost, the amount of time that my fruit trees are exposed to temperatures at or below 32 degrees are short. The road bed of Mountain Ridge Rd at Megan Terrace is projected to be raised by 20 feet. This in effect will act as an air "dam" and hold the colder air temperatures much longer. The lower portion of my avocado trees and other vegetation may be severely impacted. Please determine and explain the following:

- a) In one degree increments from 32 degrees down to 20 degrees, with no wind, how much longer will my trees that are below the Mountain Ridge Rd elevation be subjected to freezing temperatures?
- b) What will be the long term damage to the trees and vegetation?
- c) Will the colder temperatures hold the increased automobile pollution (due to the amount of increased traffic) longer in the air? Will this cause damage or impact the trees in any way or manner?
- d) How will these impacts be mitigated?

2) With the road bed of Mountain Ridge Rd at Megan Terrace projected to be raised by 20 feet, and with the amount of traffic increase by several times:

- a) How will the air patterns affect the pollinators for avocado and citrus trees along with other fruit and flowers?
- b) How will the air patterns affect the birds of prey that hunt in the areas on both sides of Mountain Ridge?
- c) How will the increased height and traffic of the Mountain Ridge Rd impact the birds of prey that hunt in the areas on both sides of Mountain Ridge?

I29a-1

I29a-2

I29a-3

I29a-1 This comment is an introduction to comments that follow. The following responses focus on the comments raised in relation to impacts that would occur if Mountain Ridge Road is improved to Public Road Standards, without design exceptions, as provided in the Mountain Ridge Road Fire Station Alternative described in Chapter 4.0 of the FEIR. This alternative considers two options for improvements to Mountain Ridge Road. Option 1 would reclassify Mountain Ridge Road to a standard Rural Residential Collector. Option 2 would reclassify Mountain Ridge Road to a Rural Residential Collector with a road exception that would allow the graded right-of-way to be reduced from 48 feet to 40 feet.

I29a-2 Chapter 4.0, Figures 4-17 and 4-18 provide cross sections of the anticipated grading needed to improve Mountain Ridge Road under the two improvement options, Option 1 and 2, respectively. Both options would require grading to raise the height of the road bed, as stated by the commenter. It should be noted that the project, as proposed, does not include the grading shown in Figures 4-17 and 4-18 and associated raising of the road bed. This is being considered as one of the project alternatives. The County acknowledges that manmade topographical changes can affect microclimates by blocking cold air flow, resulting in prolonged freezing temperatures. However, the actual effect on duration of freezing temperatures at your property due to a higher Mountain Ridge Road is speculative. Various scenarios could occur that would depend on variables such as the speed and direction of airflow. For example, it is possible that a higher Mountain Ridge Road could block cold air from entering your property, if cold air is coming from the west. It is also possible that a wider road with increased vehicular traffic produces a different microclimate that increases temperatures and improves air flow, resulting in a beneficial effect to orchards. Or, the road could have no effect on air flow and cold air could continue to drain off these properties to the lower elevations to the north west. However, all of these scenarios and assumptions would be speculative to include in the FEIR as a potential impact. As a result, the conclusion that the Mountain Ridge Road Fire Station Alternative would have the same impacts as the project (M-AG-1 through M-AG-4) remain valid and no additional mitigation would be required.

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	<p>I29a-2 (cont.) Similarly, it would be speculative to identify any additional impact to trees and vegetation associated with this alternative. As discussed in the FEIR, biological resource impacts of this alternative would be slightly greater than the project. Specifically, the alternative would result in all of the same biological resource impacts as the project plus an additional sensitive habitat impact (Impact MRR-BIO-1a) and jurisdictional habitat impact (Impact MRR-BIO-2a) that would require additional mitigation (M-MRR-BIO-1a and M-MRR-BIO-2a) to be reduced to below a level of significance.</p> <p>I29a-3 As discussed in the response to comment above (I29a-2), potential for changes in air patterns to occur due to a raised height of Mountain Ridge Road under the Mountain Ridge Road Fire Station Alternative would be speculative. Air patterns depend on various factors in addition to topography, such as the direction of airflow, temperature and other meteorological conditions. Making a conclusion about potential impacts to pollinators and birds of prey resulting from changes in air patterns in the FEIR would not be appropriate based on the level of speculation required and a lack of evidence that would support such a conclusion. Similarly, potential impacts to birds of prey from changes in Mountain Ridge Road (higher elevation and increased traffic) would be speculative and unlikely, considering the small segment that would require an elevation increase and the low volumes of traffic projected for Mountain Ridge Road.</p>
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<p>3) With the elimination of the Mountain Ridge storm drain for rain water coming down from Megan Terrace:</p> <ul style="list-style-type: none"> <li>a) How much more water will be diverted off of Megan Terrace and where?</li> <li>b) What is the current capacity of the drain located on the property east of Mountain Ridge?</li> <li>c) How will the drain be modified to accept the increase in water drainage?</li> <li>d) What will be done to abate the accumulation of water?</li> <li>e) What will be done to control the mosquitos that may inhabit the drain system?</li> </ul>	<p>I29a-4</p>	<p>I29a-4 Chapter 4.0 of the FEIR evaluates the Mountain Ridge Road Fire Station Alternative and concludes that the alternative would include BMPs, LID measures, and storm water infrastructure in accordance with local, state, and federal regulations similar to those required for the project, as described in subchapter 3.1.7.2. The analysis of these impacts is already included in the EIR because drainage and storm water improvements are within the disturbance area analyzed by the EIR Refer to Figure 4-17 of the FEIR which shows the existing culverts that would need to be extended. It would be feasible to mitigate drainage and stormwater impacts through standard measures and compliance with existing regulation, within the identified disturbance footprint. Regarding mosquito control, the same vector management techniques discussed in subchapter 2.7.2.5 and Appendix L for drainage and stormwater features could be use to address mosquitos under this alternative.</p>
<p>4) With the road bed of Mountain Ridge Rd at Megan Terrace projected to be raised by 20 feet and built to public road standards, and with the current one street light:</p> <ul style="list-style-type: none"> <li>a) Will any additional street lights be installed? If so, what will be the lighting impacts to those residents that view this section of Mountain Ridge?</li> <li>b) How much additional light will be reflected back to those homes?</li> <li>c) How much light will be reflected back to the outside areas of those properties?</li> <li>d) How will this impact nighttime predators?</li> <li>e) How will this impact nighttime pollinators?</li> </ul>		
<p>5) With the road bed of Mountain Ridge Rd at Megan Terrace projected to be raised by 20 feet, sound from the road will not be the same. Please explain:</p> <ul style="list-style-type: none"> <li>a) How the sound from cars and trucks will change?</li> <li>b) Will the road banks/slopes reflect the sound further?</li> <li>c) Will the road banks/slopes attenuate the sound?</li> <li>d) For those properties that can view the sections of Mountain ridge that have been raised past their current height, what are the sound impacts to those residents that utilize the outside areas of their properties?</li> <li>e) For those properties that can view the sections of Mountain ridge that have been raised past their current height, what are the sound impacts to those residents in their homes?</li> <li>f) Will the road banks/slopes reflect the sound from I-15?</li> <li>g) Will the road banks/slopes attenuate the sound from I-15?</li> <li>h) Will the road banks/slopes affect the sound from I-15?</li> <li>i) Will the road banks/slopes reflect aircraft noise?</li> <li>j) Will the road banks/slopes attenuate aircraft noise?</li> <li>k) Will the road banks/slopes affect the level of aircraft noise?</li> <li>l) Will the road banks/slopes attenuate the sound from Camp Pendleton artillery?</li> <li>m) Will the road banks/slopes affect the sound Camp Pendleton artillery?</li> <li>n) Will the road banks/slopes reflect the sound from Camp Pendleton artillery?</li> </ul>	<p>I29a-6</p>	<p>I29a-6 A noise analysis was completed for the Mountain Ridge Road Fire Station Alternative (Appendix V-3). The Mountain Ridge Road Fire Station Alternative (Option 1) would result in a new significant vibration impact (Impact MRR-N-1) due to roadway construction occurring within 150 feet of a residence due to construction located closer to the existing residences. However, the impact would be avoided by the same mitigation measure required for the project (M-N-12, see subchapter 2.8.6.3). This mitigation requires monitoring of activities and, as needed, modification of activities to reduce vibration to below 0.004 RMS at residences and other sensitive land uses. Operational noise levels anticipated along Mountain Ridge Road under this alternative are included in Chapter 4.0, Table 4-16. While operational noise levels at some receiver locations would increase under this alternative relative to the project, none of the properties along the proposed Mountain Ridge Road alignment would be</p>

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Respectfully,

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I29a-6 (cont.)

exposed to operational noise levels in excess of the County Land Use and Noise Compatibility Guidelines. Figure 4 of Appendix V-3 shows the location of the various noise receiver locations that were evaluated for this alternative. The commenter's residence is at the receiver location R-118.

Based on the proposed roadway design and the elevation of the roadway in relation to the commenter's residence, expected traffic noise as experienced from outdoor areas of the property at location R-118 would be reduced by one decibel under the Mountain Ridge Road Fire Station Alternative, compared to the project noise levels.

Due to the distance from I-15, the change in the height of the road would not be expected to have a measurable effect on noise levels from I-15. Noise conditions from aircraft and Camp Pendleton would be expected to be the same under the project as this alternative due to the distance of the noise source. The elevation of Mountain Ridge Road is not expected to attenuate noise from Camp Pendleton.