

Letter I51c

July 22, 2014

To: Mark Slovick, Project Manager
County of San Diego Planning and Development Services
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Subject: Revised DEIR Public Comments Regarding the DEIR Chapter 2.1 Visual Resources 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:
Comments on Section 2.1 Visual Resources

DEIR Subchapter 2.1 Visual Resources the County of San Diego factually understates Significant Impacts to Visual Resources by the Project.

Comment 2.1.2.1- Issue 1: THE COUNTY HAS NOT FOLLOWED ITS OWN GUIDELINES FOR DETERMINING SIGNIFICANCE OF SCENIC VISTAS IN AN UNBIASED MANNER

The County's guidelines are below:

"According to the County's Guidelines for Determining Significance – Visual Resources (County of San Diego 2007a), a significant impact would occur if the project would **substantially obstruct, interrupt, or detract** from a valued focal and/or panoramic vista **from a public road**, a trail within an adopted County or State trail system, a scenic vista or highway, or a recreational area."

The County asserts that the I-15 view scope will not change. This is true and irrelevant.

West Lilac and Circle R Drive are Public Roads.

The current view scope of the West Lilac/Circle R Drive loop to Highway 395 is very similar to the noted Scenic State Highways.

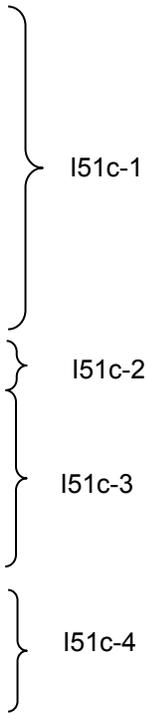
The Project will forever obstruct, interrupt and detract from the panoramic vista viewed from West Lilac Public.

There will be significant impact to the West Lilac view scope for which there is no Mitigation feasible.

There is Significant Impact for Issue 1 – Scenic Vista that is Unavoidable.

Comment 2.1.2.3 – Issue 3 Visual Character or Quality - THE COUNTY HAS NOT FOLLOWED ITS OWN GUIDELINES FOR DETERMINING SIGNIFICANCE OF VISUAL CHARACTER IN AN UNBIASED MANNER

The County's guidelines for Visual Character or Quality are below:



151c-1 This comment pertains to the significance criteria utilized in the visual analysis of the project. To clarify, the 2007 County Visual Resource Guidelines state:

The following significance guidelines should guide the evaluation of whether a significant impact to visual resources will occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect:

3. *The project would substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from:*

- a public road,
- a trail within an adopted County or State trail system,
- a scenic vista or highway, or
- a recreational area.

This comment does not address specific issues related to the environmental impacts of the project. No further response is required.

151c-2 As indicated in FEIR subchapter 2.1, I-15 is a County Scenic Highway and, therefore, it is important to address the project's impacts to views from I-15.

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RESPONSE

	<p>151c-3 As detailed in FEIR subchapter 2.1, a viewshed analysis (FEIR Figure 2.1-2) was completed to determine the impacts of the project upon the visual aesthetics from existing roadways. As shown, the site is not visible from Circle R Drive but is visible from West Lilac Road where it is adjacent to the site only for approximately 0.5 mile. West Lilac Road is not a designated scenic route or panoramic vista. The views from this short segment of West Lilac Road adjacent to the site are generally limited to the local agricultural community, and consist of the roadway and immediate adjacent landscaping, orchards, disturbed native vegetation, driveways, and structures. Pursuant to the County's Guidelines for Determining Significance – Visual Resources (County of San Diego 2007a), a significant impact would not occur if the project would not substantially obstruct, interrupt, or detract from a valued focal and/or panoramic vista from a public road, a trail within an adopted County or State trail system, a scenic vista or highway, or a recreational area. As stated in the FEIR subchapter 2.1.2.1, the project impact to scenic vistas would be less than significant based on the distance of these views, timing of views available to travelers, and implementation of the proposed Development Standards and Regulations.</p>
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RESPONSE

“According to the County’s Guidelines for Determining Significance – Visual Resources (County of San Diego 2007a), a significant impact would also occur if the project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with **important visual elements or the quality** of the area (such as theme, style, setbacks, **density**, size, massing, coverage, scale, color, architecture, building materials, etc.).”

The County asserts that the I-15 view scape will not change. This is true and irrelevant.

The dense urban features of the Project in stark contrast to the rural lands that surround the Project is a Significant Impact to West Lilac and Circle R Drive Public Road views.

There is Significant Impact for Issue 3 – Visual Character or Quality that is Unavoidable.

Sincerely,

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I51c-4
cont.
I51c-5
I51c-6

151c-4 To clarify, the 2007 County Visual Resource Guidelines state:

The following significance guidelines should guide the evaluation of whether a significant impact to visual resources will occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on visual resources, absent specific evidence of such an effect:

1. *The project would introduce features that would detract from or contrast with the existing visual character and/or quality of a neighborhood, community, or localized area by conflicting with important visual elements or the quality of the area (such as theme, style, setbacks, density, size, massing, coverage, scale, color, architecture, building materials, etc.) or by being inconsistent with applicable design guidelines.*

The commentator states a conclusion but does not provide any specific evidence of a significant adverse visual effect pursuant to the County guidelines, or any evidence regarding how the analysis of visual impacts in the FEIR does not comply with the County guidelines. Therefore, no further response can be provided.

151c-5 Subchapter 2.1.2.3 analyzes key viewpoints considered in the FEIR analysis related to the project viewshed. I-15 is a County Scenic Highway, and as such was considered a key viewpoint and addressed accordingly in the FEIR subchapter 2.1.2.3.

151c-6 As previously discussed in response to comment I51c-3, the site is not significantly visible from Circle R Drive and views of the site from West Lilac Road are limited to the approximately 0.5 mile segment along the northern project boundary. The FEIR subchapter 2.1.2.3 identifies that the project would result in a significant visual impact along that portion of West Lilac Road due to the changes to the visual environment related to dominance, scale, diversity, and continuity. As this comment suggests, this impact is identified as significant and unavoidable in FEIR subchapter 2.1.6 in part because Fire Code regulations prevent landscaping from being installed at closer intervals to allow overlapping of trees in order to mitigate the visual impact in this location.