

Letter I51o

July 8, 2014

To: Mark Slovick, Project Manager  
County of San Diego Planning and Development Services  
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San Diego, CA 92123  
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**Subject:** Revised DEIR Public Comments Regarding Traffic Related General Plan Consistency, and DEIR Chapter 1 Objectives, Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

Attached in Attachment 1 are the August, 2013 Public Comments regarding Lilac Hills Ranch Traffic Related General Plan Consistency Issues.

The REIR did not directly respond to each of the items and failed to adequately respond to the issues raised in this letter and its Attachments.

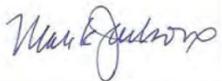
For example, the specific question was asked:

"The third issue is with the highlighted statement that follows: "creating a hydrologically sensitive community in order to reduce urban runoff." From our analysis of the Accretive Hydromodification Design, we find the analysis is marginal; requiring rainwater collection and storage from rooftops and a total of 23 acres of permeable paving to meet Hydrology requirements with the indicated preliminary design. The truth of the matter is that Accretive is proposing covering large areas of rural farm land with impermeable surfaces. If the Hydro design is compliant, it achieves compliance only in the most optimistic scenarios with scant margin. **Is this what a hydrologically sensitive community is?**"

The Public is entitled to an answer to the question.

Published County policies and specific assurance from County Staff have clearly stated that all August 2013 DEIR comments if resubmitted, will be responded to. Therefore, respond to each specific issue raised in the attached letter as part of the County's Response to Public Comments for the revised DEIR.

Sincerely,



I51o-1

I51o-2

I51o-3

I51o-1 See responses to comment letter I51n.

I51o-2 As explained in subchapter 3.1.3 of the FEIR, the project's primary mitigation element for project-related storm water discharges is the installation and permanent maintenance of three hydromodification (HMP) mitigation ponds or detention basins as shown on Figure 1-4 of the FEIR. The Hydromodification Management Plan, Storm Water Management Plan, and Preliminary Drainage Studies prepared for the project determined that the proposed detention basins alone would meet water quality requirements and HMP requirements resulting in a reduction of the storm water runoff from the site to be at or less than the pre-development conditions. Additionally, the project design is in compliance with the current National Pollution Discharge Elimination System permit and SUSMP requirements which will ensure that the project will not cause any additional negative hydrological or water quality impacts to downstream properties and facilities. Refer to Table 1-3 for a list of project design features that would ensure storm water and drainage are appropriately treated on-site. These include construction and operational features such as LID Strategies including conservation of natural areas and preservation of significant trees. Source control BMPs including storm drain inlets identified and marked, "No Dumping"; landscaping design that minimizes irrigation runoff and use of drought tolerant plants and trees. Treatment Control BMPs include use of irrigation and bioretention in landscaped areas.

The permeable pavers in the streets and the rain water capturing systems from future roofs are offered as possible alternatives or supplements to the traditional detention basins and/or as additional project design measures to further reduce the impervious footprint of the project, enhance the hydrologic/water quality sensitivity of the project and allow for a reduction in the size of the proposed hydromodification mitigation ponds. At final engineering, the project will be required to be in conformance with current water quality and HMP requirements. Based on these requirements, the project would implement one or more of these measures in the final design, along with the three permanent detention basins. With these measures, the project would be more of a hydrologically sensitive community than is currently required by the County or Regional Water Quality Control Board.

I51o-3 All letters submitted have been responded to and included in the FEIR. All Jackson letters are identified as I51a through I51o.

LETTER

RESPONSE

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Attachments

# 388/389

## Escondido to Pala

M-F • SA • SU • H

**Destinations/Destinos**

- Palomar College Escondido Branch
- Regal Cinemas
- Palomar Medical Center
- Harrah's Rincon Casino
- Pala Casino
- Casino Puma
- Valley View Casino
- East Valley Community Center
- Highway 76 Park and Ride



**388/389** | Escondido to Pala

Bold denotes P.M. times/Horarios en negritas son en la tarde

<b>388 Monday - Sunday</b> Northbound to Pala via Valley Center						
Escondido Transit Center	Valley Pkwy. & Midway Dr.	Valley Center Rd. & Cole Grade Rd.	Valley View Casino	Harrah's Rincon Casino	Casino Pauma	Pala Casino
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
5:03	5:17	5:33	5:44	5:53	6:07	6:28a
7:03	7:18	7:38	7:50	8:01	8:16	8:46
9:03	9:18	9:35	9:48	10:02	10:22	10:52
11:03	11:20	11:39	11:52	<b>12:03</b>	<b>12:23</b>	<b>12:48p</b>
<b>1:03</b>	<b>1:21</b>	<b>1:40</b>	<b>1:53</b>	<b>2:04</b>	<b>2:23</b>	<b>2:50</b>
<b>3:03</b>	<b>3:21</b>	<b>3:39</b>	<b>3:53</b>	<b>4:05</b>	<b>4:22</b>	<b>4:49</b>
<b>5:03</b>	<b>5:23</b>	<b>5:42</b>	<b>5:54</b>	<b>6:05</b>	<b>6:22</b>	<b>6:49</b>
<b>7:03</b>	<b>7:23</b>	<b>7:42</b>	<b>7:54</b>	<b>8:05</b>	<b>8:20</b>	<b>8:44</b>

<b>388 Monday - Sunday</b> Southbound to Escondido via Valley Center						
Pala Casino	Casino Pauma	Harrah's Rincon Casino	Valley View Casino	Valley Center Rd. & Cole Grade Rd.	Valley Pkwy. & Midway Dr.	Escondido Transit Center
<b>7</b>	<b>6</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>
7:05	7:25	7:46	8:03	8:12	8:32	8:44a
9:05	9:25	9:46	10:03	10:12	10:32	10:44
11:05	11:25	11:46	<b>12:03</b>	<b>12:12</b>	<b>12:32</b>	<b>12:44p</b>
<b>1:07</b>	<b>1:28</b>	<b>1:48</b>	<b>2:05</b>	<b>2:14</b>	<b>2:36</b>	<b>2:50</b>
<b>3:05</b>	<b>3:25</b>	<b>3:45</b>	<b>4:01</b>	<b>4:11</b>	<b>4:32</b>	<b>4:46</b>
<b>5:04</b>	<b>5:26</b>	<b>5:47</b>	<b>6:01</b>	<b>6:10</b>	<b>6:34</b>	<b>6:48</b>
<b>7:03</b>	<b>7:21</b>	<b>7:41</b>	<b>7:56</b>	<b>8:05</b>	<b>8:27</b>	<b>8:38</b>
<b>9:03</b>	<b>9:22</b>	<b>9:42</b>	<b>9:59</b>	<b>10:08</b>	<b>10:30</b>	<b>10:39</b>

Routes 388 and 389 are funded in part by a federal 5311(c) grant received by the Reservation Transportation Authority.

Las Rutas 388 y 389 están respaldadas en parte por un subsidio federal 5311(c) recibido por la Autoridad de Transporte de las Reservas Indígenas.