

LETTER

RESPONSE

F1

FAX NO. : 7609671952

Jul 28 2014 03:41PM PL

Letter I52

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (IM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3600 12-010
(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

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

See next page

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

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County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
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Signature: *[Handwritten Signature]*
Date:
Print Name: *Koppenhaver*
Address: *3863 Somers Ct*
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City: *Escondido* State: *CA* Zip Code:
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COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 28, 2014

LETTER

RESPONSE

FAX NO. : 7609671952

Jul 29 2014 03:41PM #2

Comment page regarding Lilac community
7/29/14

- 1. Please explain how the report addresses how a high urban density project complies with the General plan of an agricultural environment? I52-1
- 2. Please explain how the plan mandates compliance with standard FMZ throughout the project for ? I52-2
- 3. Please explain how you will gain access to private roads for easements in a fire emergency?
- 4. How do you plan on mandating access to private roads during an fire emergency? I52-3
- 5. Did the owners to the properties agree to allowing public access for possibly over 1,4000 occupants?
- 6. Please give the time required to accomplish blasting and the length of time required to do removal and placement of fills? I52-4
- 7. Explain how specifically the road expansions will be funded by Cal Trans to make the roads safe for cyclists? I52-5
- 8. Explain how the project allows for aerial spraying in the pre existing agricultural areas in a urban dense development while still allowing for sustainable farming. I52-6
- 9. Has anyone done studies on the weight the Lilac bridge will support in the event of gridlock loading of cars, animal and possessions during an evacuation? What is the maximum continuous amount of weight the bridge will support? I52-7

I52-1 Subchapter 3.1.4 and Appendix W of the FEIR address project consistency with the General Plan and its Guiding Principles and Policies. For example, General Plan Policy 4.1.7 states, "Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage." As discussed in Appendix W, the project demonstrates consistency with this policy through the protection of 20.8 acres of on-site agricultural land that would be available for community gardens and orchards, and through off-site preservation of 48.3 acres of agriculture. In addition, trails would be lined with 50-foot buffers planted with orchards. Commercial areas would accommodate farmer's markets and agricultural boutiques for value added products and small wineries. Existing agricultural areas in open space would be permitted to continue consistent with approved resource management plans. Adjacent agriculture would also be protected by residential Covenants, Conditions and Restrictions (CC&Rs) that discourage complaints. Other agricultural policies are discussed further in Appendix W.

I52-2 Fire behavior modeling calculations were used to assist in the determination of suitable fuel modification requirements, and adequate widths of vegetation treatment and maintenance areas. These distances and requirements are delineated as Fuel Management Zones (FMZ) and are displayed graphically in Figure 1-6, in Chapter 1.0 of the FEIR. In compliance with the County's Consolidated Fire Code (Section 96.1.4907.2) and the Public Resources Code, the project includes a 100-foot FMZ or provides alternative measures to meet the intent of the requirement.

The 100-foot FMZ is defined in terms of two distinct zones. The area 50 feet from the edge of all structures, identified as Zone A, requires clearing of all vegetation that is not fire resistant and replanted with irrigated fire-resistant landscaping. Actively managed irrigated agricultural crops/orchards may be integrated into the zone. Zone B is the remaining 50 feet of fuel management adjacent to flammable vegetation. Roads and other "non-structure" improvements are allowed in this zone.

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	<p>I52-2 (cont.) As shown on Figure 1-6, several areas of the project site would not meet the 100-foot standard for FMZs as described by Consolidated Fire Code. The Consolidated Fire Code provides that fuel modification zones may be reduced where fire-resistive structures or other features are provided above and beyond the code that meet the intent of the code. Specific fire-resistive building features and/or landscape features that provide the same function as a full 100 feet of fuel modification can be found in Section 4.6 of the FPP. Example measures include Class A roofing, installation of fire-resistant construction specifications for exterior walls, vents, and roof overhangs.</p> <p>I52-3 During an emergency, fire responders have legal rights to order evacuations through private roads, if warranted by fire conditions. With respect to property owners allowing public access, it is only during an emergency when emergency responders would have the right to allow safe passage through the private roads.</p> <p>I52-4 The FEIR includes conceptual blasting locations in Figure 1-19. The FEIR, subchapter 2.8 and Appendix M evaluates the potential impacts that would be associated with proposed blasting, however at the current stage of the project design, a blasting study has not been completed and no specific blasting timelines, blast numbers, or detailed locations are available. Detailed blasting studies would be conducted concurrent with future grading plans. However, at this stage, the FEIR discloses the potential blasting impacts of the project using conservative assumptions. The FEIR identifies two blasing impacts, impacts N-14 and N-16. Mitigation measures M-N-11 and M-N-12 would reduce potential blasting impacts to less than significant. Regarding the length of time required for removal and placement of fills, the project would be constructed in phases, with construction of the project anticipated to occur over an 8- to 12-year period in response to market demands and to provide a logical and orderly expansion of roadways, public utilities, and infrastructure.</p>
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	<p>I52-5 It is unclear what Caltrans road improvements the commenter is referring to. However, the FEIR includes an analysis of transportation hazards and bicycle facilities in subchapters 2.3.2.3 and 2.3.2.4 and finds impacts associated with these subject areas would be less than significant. For example, General Plan Policy M-11.3 (Bicycle Facilities on Roads Designated in the Mobility Element) requires maximization of bicycle facilities on County Mobility element roads in Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character. The project proposes to dedicate and install the designated Community Trails Master Plan (CTMP) segment along the entire length of the south side of West Lilac Road. This public trail would be built as a Type D pathway. The project does not include any feasible mitigation measures that would be implemented by Caltrans, therefore a more detailed response to this comment cannot be provided.</p> <p>I52-6 The FEIR includes a detailed discussion regarding pesticide use, including the regulations in place to prevent harm to people or the surrounding environment. (FEIR, subchapter 2.4; Agricultural Resources Report (ARR) pages 34-39.). In addition, to analyze the potential indirect impacts to surrounding agricultural land, the FEIR identified 13 “agricultural adjacency areas” or “AAs,” around those portions of the project perimeter where the proposed development would abut existing off-site agricultural operations. (Draft FEIR, Figure 2.4-7; ARR Figure 16.) Analysis of the project’s impacts relative to each AA is presented in FEIR subchapter 2.4.2.3 and ARR Section 3.0. For further discussion on the analysis of indirect agricultural resources impacts, including pesticide use issues, refer to the Global Response: Agricultural Resources, Indirect Impacts included in the introduction to these responses to comments.</p> <p>I52-7 While the County has maintenance responsibility over the surface of the West Lilac Bridge over I-15, Caltrans has maintenance responsibility for the actual bridge structure. Caltrans has reviewed the proposed project and projected traffic volumes that would use the I-15 bridge and has not raised any concerns over the capacity of the bridge to support projected traffic or traffic that could occur in the event of emergency evacuation. The bridge would have been designed to support a fully loaded scenario and no issues with bridge capacity are anticipated.</p>
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