

LETTER

RESPONSE

Letter 186

July 24, 2014

Mark Slovick
County of San Diego Planning and Development Services
5510 Overland Ave., suite 310
San Diego, Ca. 92123

re: Public comments for the Lilac Hills REIR

Dear Mr. Slovick,

I believe the only option that should be considered is the one that sticks with current zoning and requires any development to follow the General Plan as it currently exists. I understand that some variances will and should be given on individual properties because of harm that was created especially when zoning was changed and adversely affected an individual owner and his ability to complete plans for his property that had been based on then current zoning.

Let's be clear, Lilac Hills Ranch in no way falls into that category.

The General Plan has provided for the housing needs for the foreseeable future. Valley Center has chosen to follow current stated goals of providing areas for growth, particularly higher density growth, near existing infrastructure. Planners across the country have recognized this need. As you move away from existing infrastructure, density decreases. That makes this development inappropriate and unnecessary, and since it is unnecessary, no special considerations should be given. Lilac Hills Ranch has requested so many variances, it is difficult to keep count. Some of the special requests now include the condemnation and taking of other people's property. And this for the sole benefit of a developer who is stuck because his main and only logical access has been eliminated.

When Accretive started acquiring land for this venture, I believe the county had a proposed road 3A on the map which gave some basis for some sort of development around that road because it gave direct access to Old 395, close to ramps for both north and south bound I-15. Most of the reason for road 3A was for an evacuation route for residents of Valley Center. No improvement has been made to benefit those resident's ability to escape the next wildfire and 3A was removed from the map for future planning. If we are to believe our County Officials, we live in wildfire country and it is not "if" but "when" the next one comes through. Putting new road blocks along two evacuation routes for those residents would be not only irresponsible but bordering on criminal. You need to consider the ramifications of people burning to death while trying to escape a wildfire that the County knew was coming and yet further hindered the ability of it's residents to escape. You told us that the County owns this plan. Is this really what you are trying to do. With no additional routes, you are going to add over six thousand cars a day onto existing roads that barely handle current capacity without an emergency evacuation. Please explain how you intend to safely handle the traffic flow on the existing roads and how you suggest people escape the next fire.

Also, please note that use of Mountain Ridge Road would have to involve the taking by Eminent Domain of my property and many others because this developer does not have legal rights to use that road without severely overburdening the very limited easements he possesses. I have

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186-1 The County acknowledges your comment and opposition to the project. Subchapter 3.1.4 and Appendix W of the FEIR address project consistency with the General Plan. As the comment raises general issues but does not raise any specific issue regarding that analysis, a more specific response cannot be provided. However, 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.

186-2 This comment makes general comments with respect to the need for easements not controlled by the developer. The FEIR analyzes impacts that could occur should land be required for improvements outside the existing right-of-way. Refer to Global Responses: Easements (Covey Lane and Mountain Ridge Road) and Off-site Improvements – Environmental Analysis and Easement Summary Table) for details on the easements held by the applicant and those that would be needed to construct the project or one of the project alternatives. With respect to the use of Eminent Domain, ultimately it is in the discretion of the Board of Supervisors to decide whether to initiate proceedings to acquire additional easements.

186-3 Road 3A was considered during the General Plan update process, but is not currently on the existing Mobility Element Map. With respect to the adequacy of fire and emergency response service, see Global Response: Fire and Medical Services. As discussed in subchapter 2.7 of the FEIR, the Evacuation Plan details evacuation routes, evacuation points, and implementation of a resident awareness and education program to keep future residents and employees informed and safe if wildfire occurs. Primary evacuation routes are through a series of internal roadways with the development, which in turn permits direct emergency evacuations to the north, south, east, and west to accommodate pending wildfire conditions. Figure 2.7-3 shows the evacuation routes including Main Street, Street "Z," Lilac Hills Ranch Road, Covey Lane, and Mountain Ridge Road. The project site would also be served by secondary emergency evacuation routes using Street "F" and Birdsong Drive on the north and Rodriguez Road in the southern Senior Neighborhood (refer to subchapter 2.7, Figure 2.7-3).

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	<p>186-3 (cont.)</p> <p>The Evacuation Plan is designed to allow adjustments to the plan throughout each phase of construction. The plan provides that as each phase of construction is completed, fire and law enforcement officials would be given the opportunity to review the plan to assure its adequacy and with each phase, the evacuation routes may be subject to changes, as deemed necessary by fire and/or law enforcement officials.</p> <p>The Evacuation Plan includes a resident awareness and education program in coordination with the Deer Springs Safety Council. The Plan also requires the implementation of a program known as "Ready, Set, Go." The focus of the program is on the public's awareness and preparedness especially for those living in the wildland-urban interface areas. The program is designed to incorporate the local fire protection agency as part of the training and education process in order to ensure that the information is disseminated to those subject to the impact from a wildfire.</p> <p>All roads proposed for use during an evacuation would be constructed to Consolidated Fire Code standards which allow for emergency equipment to utilize the roads simultaneously with evacuating residents</p> <p>186-4</p> <p>The FEIR analyzes impacts that could occur should land be required for road improvements outside the existing right-of-way. With respect to the use of Eminent Domain, ultimately it is in the discretion of the Board of Supervisors to decide whether to initiate proceedings to acquire additional easements. Regarding the impact of a property being reduced to below the minimum two acre zoning requirement, a reduction in lot size to below two acres zoning minimums would not affect the ability of parcel to be used for single-family residential purposes, provided the parcel can still accommodate a residence. Refer also to the Global Responses: Easements (Covey Lane and Mountain Ridge Road) and Off-site Improvements – Environmental Analysis and Easement Summary Table for additional details responsive to this comment.</p>
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<p>no intention of voluntarily selling my property for that use. Please explain how any property impacted by the Eminent Domain process, will be affected by the possibility of being reduced below the current zoning of a minimum of two acres.</p>		<p>186-5 The comment expresses the opinions of the commentator. 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. However, because the comment does not raise a specific environmental issue, no further response is required.</p>
<p>It appears that much of this REIR is based on "facts" from the Dudek report and the RECON report. Since the reports were commissioned by Accretive, it is not surprising that they are biased and avoid any facts that would look bad for their client.</p>	186-4 cont.	<p>186-6 Refer to Global Response: Fire and Medical Services included in the introduction to these responses to comments.</p>
<p>Dudek has blatantly left out one of the four requirements for a fire station to meet the designation of "closest fire station" because that requirement takes away the option of the fire station they want to use to meet the requirements in the General Plan. I believe you will discover, if you haven't already, that Cal Fire wants no part of taking on that obligation. The Dudek report is extremely misleading in it's designation of Station 15, sometimes calling it Deer Springs station 15. There is no Deer Springs station 15. This kind of false information should not be allowed to exist in the REIR. If this false information is allowed to remain in this report, it will cause decision makers to decide these important matters based on incorrect information. Anyone reading this report will assume fire protection is not an issue when it is actually a very big issue.</p>	186-5	<p>186-7 The comment refers to an unspecified RECON report, which is understood to be Appendix V, the Mountain Ridge Road Fire Station Alternative Noise Analysis. The referenced methodology used in the report is based on calculation of the hypotenuse based on the other two known sides. This methodology is used because construction noise is assessed on the hourly, or 8-hour, noise level equivalent, which requires a calculation of the noise levels from maximum steady noise levels. To determine the noise levels at a given location, when equipment will be moving from one location to another, or closer to or further from a receiver, the centroid of the activity is used to average the total noise exposure over the period of time. For a standard construction site, the center of the site is used, however, with a linear construction activity where the work typically covers greater distances the distance from the center of the roadway is not the same as the center of the activity. So we have to calculate the distance from the length of the work area as well as the distance to the nearest location where the equipment passes a receiver. For example, using 300 feet as a typical roadway construction working length, or the distance equipment would generally cover in a single hour during earthwork, paving, striping, etc., and assuming a receiver is 50 feet from the centerline of the working path, the average distance to the equipment can be calculated as $h = \sqrt{(150^2) + (50^2)} = 158.114$ ft. This calculation is used to determine the distance to the center of construction activity for a linear project. See also the responses to comment letter I51j for additional details about the adequacy of the noise analysis.</p>
<p>The RECON report is very fond of declaring the effects of construction and road grading on other people as "less than significant ". Just one example that affects me personally found on page 7, last paragraph. My house is located 45 feet from the centerline of construction. That should put grading within 20 feet of my house. But I'm not to worry because due to the magic of the laws of the right triangle, the average distance from my house to the grading activity is 150 feet therefore "less than significant". Of course the fact that I can't leave my house for the entire process is probably "less than significant" also. By the law of the right triangle, I guess you could throw two baseballs, one hits me in the head but the other misses by ten feet, no harm because the average was five feet away. Seriously, is this the logic you will use to determine the actual effects on the residents who moved here for the rural uncrowded atmosphere.</p>	186-6	
<p>Due to the lack of clarity and the confusing manner in which this report is drafted and the manner in which the findings are presented (or not presented), I appeal to the County to review this report carefully.</p>	186-7	
<p>First, in order to put this analysis in perspective, The RECON "Mountain Ridge Road Fire Station Alternative - Noise Analysis" dated May 16, 2014 was prepared to identify and document potential noise and vibration impacts related to the existing Mountain Ridge Road community, the majority of whom live in Circle R Estates . Circle R Estates is located along a 1,200 foot section of Mountain Ridge Road which runs south from the LHR project's southern boundary, along Megan Terrance and Adams Ct., to the top of the steep hill south of Megan ("the Circle R Community.")</p> <p>This report is mandated by law, County policy and CEQA as one of the key reports required in response to the County's Mountain Ridge Road Fire Station Alternative. This report will be used by the County as part of the Condemnation and Eminent Domain Process (the "Recon Condemnation Report"). The County is proposing to take private property from 30 or more individuals to convert Mountain Ridge Road from a private road to a Public Road.</p>	186-8	
<p>Condemnation proceedings are a very complex and tightly regulated process which requires all parties to adhere to the highest ethical standards to maintain the integrity of the process.</p>	186-9	<p>186-8 Please see response to comment I86-7.</p>

To convert Mountain Ridge Road from a Private Road to a Public Road is a very complex and major construction project. More than 16 excavators, graders, front end loaders and other similar construction related equipment will be required. More than ten thousand trucks loaded with fill and asphalt will be required. As noted in the report, after completion traffic will increase from 160 trips per day to more than 3,000 - an increase of greater than 2,000%.

As part of the Condemnation process, RECON was hired by Accretive, the Lilac Hills Ranch Project Developer, to:

1. Determine and quantify the significance to the Circle R Community and Mountain Ridge Road residents of the construction noise resulting from the construction of the public roadway and whether the construction noise impact complies with County Standards. The measurement used to quantify the noise impact of construction activities is dB(A). According to Recon on page 6 of the Recon Condemnation Report:
 - a. "The County has well-defined [construction noise] Noise Ordinance that covers construction noise and prohibits noise levels in excess of 75 dB(A) L [average] for an 8 hour period; and
 - b. Construction noise is "measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received."
2. Determine the "direct impact" to the "existing conditions" of the increased noise resulting from converting Mountain Ridge Road Private to Mountain Ridge Public Road. In this case, the existing condition for Mountain Ridge Road Private is 160 average daily trips per day and upon conversion of the road to Mountain Ridge Road Public, the traffic would be 3,410 average daily trips a day. The "direct impact" is measured by the "delta" --- or the increase in noise - between the noise generated by existing use of the road (160 average daily trips a day) compared to the proposed use of the road 3,410 average daily trips a day.

The noise measurement to determine the impact of traffic noise is CNEL (Community Noise Equivalent Level). According to the County Noise Standards - Table 2 - on page 5 of the Recon Condemnation Report, **noise from traffic is measured at the exterior areas used by the homeowner and guests as an outdoor living area such as pools, patios, outdoor sitting areas as well as gardens and landscaped areas.** In addition, the Circle R Community is a "Home Owners Association" which provides and maintains "group open space" for the exclusive use of its residents and their guests. This group open space includes private gated roads (Megan Terrace and Adams Ct.) that are for the exclusive and private use of the HOA residents and guests. **These private areas are routinely used by residents as a pedestrian walkway, especially for families with children as well as families with baby carriages.**

3. Determine the traffic "noise contours" along Mountain Ridge Road for the proposed traffic on Mountain Ridge Public to determine if they comply with County's 60 CNEL standard. Noise contours (essentially visually representations of the traffic noise) are shown in noise reports as a Figure of an aerial photograph or detailed drawing that has the noise contours shown. As an example, in the areas where noise levels are 70 CNEL, those areas are highlighted in Orange. In areas where noise levels are 65 CNEL, those areas are shown in yellow. In areas here noise levels are 60 CNEL, those levels are shown in green. Also, a noise analysis report should provide a "Traffic Noise Prediction Model" which provides a summary of the specific details of the traffic noise

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186-9 The Mountain Ridge Road Fire Station Alternative is included to analyze an alternative that would include a fire station within Phase 5 to provide additional options for a permanent fire station. The comment primarily restates information contained within the FEIR and does not raise a specific issue with regard to the analysis. It should be noted that with respect to the use of Eminent Domain, ultimately it is in the discretion of the Board of Supervisors to decide whether to initiate proceedings to acquire additional easements. Refer also to the Global Responses: Easements (Covey Lane and Mountain Ridge Road) and Off-site Improvements – Environmental Analysis and Easement Summary Table for additional details responsive to this comment.

186-10 This comment provides factual information (with exception of the references to "condemnation" and the "RECON Condemnation Report") that describes the scope of work for the Mountain Ridge Road Fire Station Alternative Noise Analysis (Appendix V). 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.

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<p>calculations including the specific number of feet (such as 48 feet) to a specific noise contour (65 db)</p>	<p>186-10 cont.</p>	<p>186-11 The Mountain Ridge Road Fire Station Alternative Noise Analysis (Appendix V) was prepared to meet CEQA requirements for evaluation of the environmental impact of project alternatives. Refer to the Global Responses: Easements (Covey Lane and Mountain Ridge Road) and Off-site Improvements – Environmental Analysis and Easement Summary Table for additional details responsive to this comment.</p>
<p>The Recon Condemnation Report is required to be a “Stand Alone Report” for use by the County as part of the Condemnation process. The Condemnation Process requires that an EIR be prepared for use by the County before it condemns private property. That is why new reports were prepared for a variety of impacts related to the Mountain Ridge Road Fire Alternative;, including traffic (1800 plus pages); Greenhouse Gas Emissions; Air Quality and of course, noise.</p>	<p>186-11</p>	<p>186-12 The County does not agree that Appendix V needs to stand alone and not reference information from the FEIR. This analysis was provided to provide detailed information to the public and decision makers as to the environmental impacts that would be associated with the Mountain Ridge Road Fire Station Alternative. This analysis would be needed if the Board of Supervisors decided to approve this alternative instead of the proposed project.</p>
<p>The Recon Report must contain and summarize all the information that is being discussed and relied upon for the Condemnation Action. Recon may not reference tables from reports that have not been prepared specifically for the Mountain Ridge Road Fire Station Alternative, such as reports have been prepared for exceptions requests to the General Plan or Specific Plan.</p>	<p>186-12</p>	
<p>The Recon Condemnation Report must contain all backup required for: determining significant impacts; understanding what significant thresholds are used for each impact category; gauge potential impacts against existing physical conditions; provide the technical information required to support the documents findings; provide a clear line of reasoning in its conclusion related to impacts, their level of significance and the level of mitigation that would be achieved by proposed mitigation measures. To further understand how flawed the Recon Noise Condemnation report is, it is important to have a general understanding from a “rule-of-thumb” perspective of noise and its impact.</p>	<p>186-13</p>	<p>186-13 This comment makes general statements but does not provide detailed comments that relate to the information contained within the FEIR. As the comment does not raise a specific issue regarding that analysis, a specific response cannot be provided and is not required. However, 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>
<p>First, the County’s Report Format and Content Requirements for Noise include a statement that a “doubling of sound energy” is considered a significant impact a “documented noise site.” A doubling of sound energy is equivalent to a 3 dB(A) increase. A document noisy site is a location with NSLU that currently exceeds 60dB(A) CNEL. This comment should have been in the Recon report but was not.</p>	<p>186-14</p>	
<p>For noise generated by construction activities from a single noise source, such as an excavator, construction, the noise level will drop by 6 dB for every doubling of the distance. Thus:</p> <ol style="list-style-type: none"> 1. If an excavator’s rated noise level factor is 85 dB(A) at 50 feet away from the source, at 100 feet away from the source (which is a doubling of the 50 feet) that noise level will drop by 6 dB to 79 dB and at 200 feet (a doubling again of the distance) the noise level will drop another 6 dB to 73 dB. 		<p>186-14 The comment refers to guidance provided in the County Guidelines for Noise, which is stated in the Noise Report, Lilac Hills Ranch, San Diego County, California, (Noise Report) prepared by RECON Environmental on May 13 2014, on page 40, Section 2.3.1. Please note the Mountain Ridge Road Fire Station Alternative – Noise Analysis letter (MMR Addendum) is not the primary report, but rather an addendum prepared solely for the analysis of the Mountain Ridge Road Fire Station Alternative. Therefore, many concepts and basic principles of noise, the existing setting, and other related information is not replicated from the primary report in the letter.</p>
<p>Inversely, for the same front end loaded rated at 85 dB at 50 feet away from the source, for every “halving” of the distance to the source, the noise level will increase 6 dB. Thus at 25 feet away from the excavator, the sound will increase by 6 dB to 91 dB - at 12.5 feet from the source the sound will increase 6 dB to 97 dB and if the excavator was located 6.25 feet from the source, it would be deafening at 97 dB.</p>	<p>186-15</p>	<p>186-15 The comment summarizes the basic principle of noise propagation from a point source and the human perception of noise level changes, which is also provided on pages 16 and 17, Section 1.2.1, of the Noise Report.</p>
<p>Sound is logarithmic. To use a general rule of thumb to help understand the impact of increased or decreased sound levels a 3 dB increase in sound is considered to be just a noticeable difference. A 6 dB increase in sound is easily noticeable and a 10 dB increase in sound is significant.</p> <p>As an example, a 10 dB increase in sound would be equivalent to the difference between a washing machine and a gas powered leaf blower.</p>		

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<p>Also, sound is cumulative. At a construction site, as a general rule of thumb, for every increase in the number of pieces of equipment being used, there is a cumulative impact. If 2 excavators are operating at a construction site, the sound level will increase by 3 db. If 2 excavator's and 2 backhoe's are operating at the site (4 pieces of equipment) the sound level will increase by a total of 6dB. If eight pieces of construction equipment are operating at a construction site, the cumulative effect would be another 3 dB increase to 9dB.</p> <p>Finally, the last important item about noise to understand is that it travels along the line of sight. If you can see a noise source and there is no mass (such as a wall) between you and the noise source, you will receive the full impact of that noise. Mass impedes --- or put another way- reduces noise. If there is wall between you and the noise source, it will impede the sound. However, if you are on a hill looking down onto the noise source behind a wall, there will be no impediment as you have a clear line of sight. The number of failures with this report is almost incomprehensible; so let's just start with the most significant.</p> <p>The most significant failure pertains to the location of the noise receptors for modeling purposes that all of the traffic noise analysis uses for modeling. THERE IS NO INFORMATION AS TO WHERE RECON LOCATED THEIR NOISE RECEPTORS.</p> <p>Incomprehensibly, RECON used dots on a map to show the location of their noise receptors. EACH DOT covers an area of almost 100 feet. Recon provided no explanation or documentation that would allow the public to understand their methodology. As noted above, RECON was to measure the impact to the community of traffic noise to an exterior noise sensitive area. Almost every home within the Circle R Community has outdoor living areas that face west, towards the sunset. The best example of the absurdly with which Recon position its noise sensors is shown on Figure 4, noise sensor R-150, my home. I have a formal patio with table and chairs on the west side of the house, less than 15 feet from Mountain Ridge Road. I have also fenced in my yard for a play area for my grandchildren that is located 12 feet from Mountain Ridge Road. Yet, Recon located the R-150 sensor on the east side of the home, behind the mass of the house ignoring the County Code for calculating noise impacts; ignoring CEQA requirements; and ignoring the defensibility and sensibility required for calculating noise impacts to a community whose property is the subject of proposed Condemnation proceedings by the County. As discussed, the integrity of the Condemnation process is of significant importance.</p> <p>But, Recon further complicates a review of the locations of their exterior noise receptors by placing a "dot" that is over 100 feet wide on top of the homes where the noise receptors are located. In the case of noise receptor R-150, that means that the noise receptor could be more than 150 feet from the road even though the exterior noise areas (what the County calls NSLU - Noise Sensitive Land Use) at this home are less than 20 feet.</p> <p>So, the next logical step is to attempt to recreate or determine where the exact placement of the noise receptors are. There is nothing in the Recon Condemnation Report that discusses the methodology used for the placement of noise receptors .</p> <p>In Attachment 1 to the Recon Condemnation Report, Recon does provide some limited details on 107 noise receptors providing X & Y coordinates. Just to be clear, that is information on 107 noise receptors, BUT NOT ONE OF THE NOISE RECEPTORS SHOWN ON FIGURE R 4 OF THEIR REPORT FOR THE HOMES ON MOUNTAIN RIDGE ROAD IS INCLUDED. NOT ONE.</p> <p>Ok....so the next logical step is to try and understand what Attachment 1 of the Recon Condemnation Report is to see if the data can be further backtracked. But, Attachment 1 of their report is NOT MENTIONED AT ALL IN THEIR REPORT.</p>	<p>186-16 The comment misstates the principal of logarithmic addition. If two equivalent noise sources are added together, it is a 3 dB increase. If an additional source, which is equivalent to the previous two, was added to the first two, it would increase the noise level by 1.8 dB. If an additional source, which is equivalent to the previous three, was added to the first three, it would increase the noise level by 1.2. Thus, the four equivalent sources would result in a 6 dB(A) increase over the single source, not a 9 dB(A) increase as asserted in the comment.</p> <p>186-17 The comment correctly summarizes the basic concept of noise propagation along a line of sight.</p> <p>186-18 The comment asserts the Noise Addendum does not disclose the location of modeled receivers. However, all off-site receivers used from modeling are shown and numbered in Figure 4 as well as in Figures 7a and 7b of the main noise report for Lilac Hills Ranch. Additionally, as correctly identified, these locations are provided again by coordinates in Attachment 3 of the Noise Report and Attachment 1 of the Noise Addendum.</p> <p>186-19 Modeled receivers are placed in proximity to the affected residence. As required by the County Guidelines for Noise, the locations are chosen based on apparent use areas, such as a swimming pool or a patio area. The modeling did not include any structures. Thus, even when the location is potentially on the opposite side of a structure from the roadway, there is no attenuation provided by the structure at the receiver. Therefore, the only shielding recognized in the modeling is due to the existing terrain or alterations in terrain due to the proposed grading. Please note the marker located for R-150 is located on the west side of the structure nearest the roadway as that is the location of the apparent outdoor use area.</p> <p>186-20</p> <p>186-21</p> <p>186-22 The markers used to identify the modeled receiver locations are centered on the modeled location. The size of the marker is dictated by the need to be able to see the marker and read the identifying numbers. The location of these markers are identical to the locations used in the Lilac Hills Ranch Noise Report (Appendix M of the FEIR).</p> <p>186-23</p>
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	<p>I86-21 All modeled noise receptors were placed in proximity to existing residences at the apparent patio location or similar area of use. No structures were included in the modeling of off-site receivers. Therefore, the modeled noise levels are conservative and represent a conservative assessment of the impacts at local residents in terms of noise level increases as well as actual noise levels at the modeled location.</p> <p>I86-22 All modeled receptor locations along Mountain Ridge Road are shown in Figure 4 of the Noise Addendum and Figure 7b of the Noise Report.</p> <p>I86-23 The comment refers to a “condemnation report,” which is assumed to be the Noise Addendum, and states the Noise Addendum does not call out Attachment 1, which contains the detailed information included in the model. A reference to Attachment 1 has been included in the Noise Addendum as a footnote to Table 7.</p>
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<p>So we continue the search. We start with a review of the LHR May 13th Recon Report for the LHR project. No mention or discussion whatsoever of the locations of noise monitors located off the project site other than a similar figure to Figure 4 of the Recon Condemnation report.</p> <p>We expand the search to all Recon reports within the REIR in an attempt to develop further information about the specific location of where off-site noise receptors are located as well as a discussion on the methodology used for determining where to place off-site noise receptors. THE RESULT WAS THE INFORMATION WAS NOT TO BE FOUND that provided any information for the off-site noise monitors other than the APN Lot Numbers.</p> <ol style="list-style-type: none"> 1. The report states, "Detailed plans with proposed roadway elevation were available for this alternative" for use with modeling. Also the authors have access to aerial and satellite imagery for use in their report. Please provide a copy of the detailed plans with proposed roadway elevations that were used for this alternative. 2. Please provide a figure and conceptual plan for the construction as discussed on page 6 of the report. As stated on page 6, construction would occur along 0.6 miles of Mountain Ridge Road and "occur over approximately 20 acres with a daily disturbance of 5 acres." As the entire Mountain Ridge off-site 40 foot private easement is 2.8 acres, please provide details and a map showing the balance of the 20 acres that will be impacted. This is critical in being able to accurately determine the noise impact to the neighborhood. Also, as referenced in the report, work will be conducted in an "average linear working distance of 300 feet" that will impact 5 acres. For each 300 foot work section, please provide details as to the type of work noise generating work activities that will be conducted and a map showing the extent of the daily disturbance. 3. On page 7, the report states that with the "exception of the residence located 31013 Mountain Ridge Road," my residence, all physical residences are located more than 150 feet from the roadway. This is not accurate. There is a residence located on the west side of Mountain Ridge, opposite Adams Ct, that is within 50 feet of the existing road easement. Also no noise monitoring was done for this home. Please explain in detail and correct the report as required. 4. Figure 4 of the report shows a Mountain Ridge Road Buffer on 150 feet. Nowhere in the report is the Mountain Ridge Road Buffer zone defined. Please define what this buffer zone is, the significance of this buffer zone and how this buffer zone relates determining whether this project conforms to Noise standards. 5. An updated Figure 4 without the red buffer zone needs to be provided showing the CNEL noise contours. All noise contours were covered by the red buffer zone. It is impossible to determine the impact to the community without detailed noise contours. Also, as this is an existing residential community, noise contours lines must be provided in smaller increments. An increase of 3 dB in noise results in an increase of 23% in loudness perception. This Figure should be redone in increments of 3dB. 6. According to page 6 of the report, the County has well-defined Noise Ordinance that covers construction noise levels in excess of 75dB. The report also notes that is "unlawful for any person to operate or cause construction equipment to be operated" that exceeds an average sound level at the boundary line of the property where the noise source is located or on any occupied property where noise is being received. This report discusses various 150 foot zones and draws conclusions that impacts would 		<p>186-24 Noise monitoring, or measurement, locations are shown by number in Figure 5, of the Noise Report which corresponds to the measurement data summarized in Table 5 of the Noise Report. Please note the Mountain Ridge Road Fire Station Alternative – Noise Analysis letter (MMR Addendum) is not the primary report, but rather an addendum prepared solely for the analysis of the Mountain Ridge Road Fire Station Alternative. Therefore, many concepts and basic principles of noise, the existing setting, and other related information is not replicated from the primary report in the letter as it is supplementary to the main report.</p> <p>186-25 As only the Noise Report and Noise Addendum utilize the off-site receivers for assessing noise impacts, only these two documents and the FEIR noise section would have included any information on the receivers. Please refer to response to comments 186-18 through 186-23.</p> <p>186-26 The detailed grading plans are depicted in Figure 4 as the black terrain lines. In addition, Chapter 4,0, Figures 4-17 and 4-18 depict the grading plans for the Mountain Ridge Road Fire Station Alternative, Options 1 and 2.</p> <p>186-27 The 20 acres was reported for consistency with the air quality report as this would represent a worse case analysis under air quality. The comment is correct that the area is closer to 1.5 acres. However, the total acreage is irrelevant in the analysis of roadway construction noise which works back and forth along the roadway in a linear fashion as opposed to moving about a large area such as in the grading operations for the main project site. The daily disturbance is within the limits of grading shown in Figure 4 of the Noise Addendum as the black lines.</p> <p>186-28 The Noise Addendum and Noise Report has been corrected to identify this residence as a noise sensitive land use; however, as the residence is located at a slightly greater distance than the residence located at 31013 Mountain Ridge Road, the analysis and impacts remain the same as reported in the Mountain Ridge Road Alternative analysis.</p>
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	<p>I86-29 The buffer zone is simply the distance at which maximum noise levels from construction activities would comply with the maximum noise level limits of Section 36.410 of the County Code. This representation will be removed from Figure 4 of the Noise Addendum as requested in response to comment I86-30.</p> <p>I86-30 The FEIR has been revised to remove the 150-foot buffer from Figure 4 of the Noise Addendum to provide additional clarity as to the locations of the noise level contours. The comment incorrectly states that a 3 dB increase represents a 23 percent increase in loudness. As stated on pages 16 and 17 of the Noise Report, a 3 dB change in noise levels is barely perceivable to a healthy human ear. Additionally, a noise level increase of less than 10 dB, where the future noise level does not exceed the County's land use and noise compatibility levels, is not considered a significant impact.</p>
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<p>be less than significant. This needs to be clarified to conform to County standards. Please provide the following details:</p> <ul style="list-style-type: none"> - What are the noise levels at the boundary line of each property (by APN) for each lot on Mountain Ridge Road and any other property in direct sightline during grading as well as subsequent construction. - What are the noise levels at the boundary line of each property (by APN) for 12,000 or so trucks that will be required to transport fill for this project. - What are the noise levels at the boundary line of each noise receptor identified in Figure 4. <p>7. Table 2 - Noise Standards - on page 5 of the report provide a detailed description of "exterior noise levels" including the methodology for defining exterior noise levels. In conformity with Table 2, please summarize in detail and provide a figure for exterior noise for each noise receptor noted in Figure 4 as well as each exterior noise level for every residence along Mountain Ridge Road and within direct sightline. All of these homes have exterior areas (such as patios, pools, gardens, etc.) that are provided for private usable open space. Please describe in detail the noise impact to the community.</p> <p>8. Figure 4 of the report shows a number of noise receivers, such as R-120 and R-150. Nowhere in the report is the location of the receivers provided. For each of the noise receivers noted in Figure 4, please provide specific details on where the noise receivers are located and how the location of those receivers was determined to be in a noise sensitive area used by homeowners for their exterior living such as gardens, walkways, patios, fenced in play areas, etc.</p> <p>9. On page 13 of the report, the authors note that the change in noise levels along Mountain Ridge Road would change "depending on the shielding or lack of shielding provided for the proposed grading for Mountain Ridge Road." Please discuss in detail all types of shielding that may be provided for Mountain Ridge Road, including a detail description of the type of shielding, which sections of the road may have shielding and the visual impacts of the shielding.</p> <p>10. Table 7 on page 13 notes the changes in cumulative operational noise level along Mountain Ridge Road between the proposed project and alternative based on average daily traffic volumes for the project and alternative as shown in Table 4. Please discuss in detail all factors that impact this calculation. Also, please discuss specifically how the proposed project noise levels for receiver 120 would be less (-4) than the alternative and receiver 150 would be less (2 dB) than the alternative despite an increase in traffic of more than 3,000 car trips a day.</p> <p>11. As the proposed alternative includes a road that will be in parts elevated more than 20 feet above the current grade, the noise levels will be increased due to the height of the road, the impact of prevailing winds, and the lack of any mass surrounding the road to dampen sound. Please discuss in detail these and any other impacts because of the road design and provide a detailed summary of all mitigation alternatives.</p> <p>12. Please provide details on the current modeled (no project) Noise Levels for all receivers shown in Figure 4.</p>	<p>186-31 cont.</p> <p>186-32</p> <p>186-33</p> <p>186-34</p> <p>186-35</p> <p>186-36</p> <p>186-37</p> <p>186-31 As the location of Mountain Ridge Road is located on an easement, as are the majority of smaller roadways in less developed area, the roadway overlaps the property lines of the affected properties. Thus, if the development of the Mountain Ridge Road Fire Station Alternative were assessed at the nearest adjacent property line, the residential uses that have the easements for Mountain Ridge Road, would be part of the parcel that construction occurs on and would not be considered. Therefore, the recommendation is not practical and would not provide useful information in the determination of impacts. However, as these properties would clearly be exposed to noise from roadway construction, the analysis attempts to strike a balance by assessing noise impacts at the noise sensitive land use areas associated with these properties, i.e., the outdoor use areas, such as swimming pools and patios.</p> <p>186-32 This information is presented in Tables 5, 6, and 7, and shown in Figure 4 of the Noise Addendum. Additionally, as stated in the County standards, the areas of noise sensitivity assessed for compliance with the land use and noise compatibility levels are limited areas in close proximity to the residence, which range in size based on the size of the lot. This does not imply the entire property will be exposed to the noise levels, rather that specific areas are not exposed to noise levels in excess of these standards.</p> <p>186-33 Please see responses to comments 186-19 through 186-21.</p> <p>186-34 The shielding would be provided by the intervening terrain due to topography changes associated with the grading of the roadway. To create a roadway with relatively smooth changes in elevation, cut and fills will be required, which will create locations where the roadway surface will drop below the terrain and shield some receivers from traffic noise.</p> <p>186-35 The noise level reductions shown are due to the changes in topography associated with the Mountain Ridge Road Alternative. To create a roadway with relatively smooth changes in elevation, cut and fills will be required, which will create locations where the roadway surface will drop below the terrain and shield some receivers from traffic noise.</p>
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	<p>I86-35 (cont.) The details of noise impacts and calculated noise levels at off-site locations, including residences along Mountain Ridge Road, are provided in Section 2.3 of the noise report. The noise level increases associated with the project are presented in Table 11 and the noise levels at each receiver is provided in Table 12. Under the alternative assessed in the Noise Addendum, similar data is replicated for the subject receivers in Tables 5 though 7 and shown in Figure 4.</p> <p>I86-36 CEQA provides that only specific comments related to the adequacy of the project's EIR are required to be addressed. This comment will be maintained in the administrative record and available for review by the decision making body.</p> <p>The modeled noise levels under the Mountain Ridge Road Alternative are based on topographic surveys and engineering plans for the future grade. As the proposed roadway improvements would not alter the location of existing residences, these were not altered. However, under the future condition, the elevation of Mountain Ridge Road as well as the location of the travel lanes were modified to match the engineer plans. Thus, the modeled noise levels take into account the changes in elevation, both increases as well as decreases in elevation.</p> <p>I86-37 The existing modeled noise levels along these roadways are provided in Table 11 of the Noise Report.</p>
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13. Please provide details on the actual project noise levels that have been determined along any portion (off-site or on-site) of Mountain Ridge Road.

186-38

There is no way a development of this size should be allowed to impact the current residents and roads in this very rural area and further risk their lives when the next fire comes. If you own this report, I hope you think long and hard about what you are doing to the current residents and what you would be doing to anyone naive enough to buy a home with inadequate escape access.

186-39

Lilac Hills Ranch is not necessary and is contrary to any current philosophy on where to locate high density development. The access to the property has changed drastically from what they thought it was when they started, forcing drastic impact on surrounding neighbors and roads. Accretive is scrambling now to find any way to keep this project alive. Do not help them at our expense.

186-40

Respectfully,

William B. Woodward Jr
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Escondido, Ca.
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760.580.3600

186-38 Existing modeled noise levels along these roadways are provided in Table 11 of the Noise Report. Future modeled noise levels are provided for the proposed project in Tables 11, 12, and 13 of the Noise Report and Tables 5 through 7 of the Noise Addendum.

186-39 The County acknowledges your comment and opposition to the project. 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.

186-40 The comment expresses the opinions of the commentator. 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. However, because the comment does not raise an environmental issue, no further response is required.