

Letter 18

From: [Royalviewranch@aol.com](mailto:Royalviewranch@aol.com) [mailto:Royalviewranch@aol.com]  
Sent: Sunday, July 27, 2014 8:46 PM  
To: Slovic, Mark  
Subject: Lilac Hills Ranch Draft REIR comments

July 26, 2014

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Mark Slovic  
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Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Re: Lilac Hills Ranch Draft REIR Comments

Dear Mr. Slovic:

The comment I would like to make is that there should be no street parking allowed. Everything should be red curbed.

Due to the massive density increase, and the fact that the project is in an "extreme fire danger area" and due to the drought and a lack of water to adequately fight a massive wildfire there should be no on street parking at any time or any place in this development.

During a fire there is no room for crowded streets and fire trucks. Some homes have multiple families living in them in these trying times and with so many vehicles to one home people tend to park all over the streets, which is an especially bad scenario in a wildfire situation when fire trucks cannot make it through to fight the wildfires with people trying to evacuate at the same time. We cannot have evacuees hindering emergency vehicles.

Another comment I would like to make is regarding the Developer not wanting to do a list of road improvements. If he wants to do his project then he needs to do the road improvements needed for the increase in traffic caused by his project. This is a Health and Safety concern, especially in the case of a wildfire.

**Lack of water/ Severe drought:** We are in a severe drought. It has been this way for several years now with no relief in sight. Now you are adding all these residents. Where is the water going to come from? Yes, I bet you are going to say it is Ag land and Ag land uses

18-1

18-2

18-3

18-1 Street parking would be allowed within certain areas of the Specific Plan. The location of street parking within Phase I is identified on the Parking Analysis Exhibit for TM 5572. Phase 1 would allow for 140 on-street parking spaces. Conflicts with street parking and fire and emergency response have not been identified for areas where street parking would be allowed in the Specific Plan. 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, including where street parking is allowed. For example, as shown on the cover page of the Master Preliminary Grading Plan for TM5571RPL4, the private residential road, Street "Z" would provide for 24 feet of pavement, exclusive of street parking which occupies an additional 6 feet where parking is provided adjacent to residences.

As detailed in FEIR subchapter 2.7.2.4, an Evacuation Plan was prepared for the project (see Appendix K). The Evacuation Plan details measures for the evacuation of residents through Main Street, which connects West Lilac Road with existing evacuation routes to the south that provide access to the north, south, east, and west. Connector roadways are Old Highway 395, Circle R Drive, and I-15. The Evacuation Plan together with required road improvements would allow safe evacuation in the event of a wildfire.

18-2 The developer would fund multiple road improvements both as design features and required as mitigation measures of the project. Specifically, as detailed in subchapter 1.2.1.4, the project includes the construction of a number of off-site roadway improvements to several roadway segments in the project's vicinity. These improvements include the widening, repaving, and restriping of portions of the following existing roadways:

- West Lilac Road
- Covey Lane
- Rodriguez Road
- Mountain Ridge Road

Additionally, the project includes the following intersection improvements:

- Installation of traffic lights at the following intersections: Gopher Canyon Road and I-15 ramps; Highway 395 and Circle R Drive; Highway 395 and West Lilac Road, Highway 395 and East Dulin Road, and Miller Road and Valley Center Road.

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<p>more water. If the Ag land is not in use, then there is zero water being used now. There will be lots of water used in this development. Also there is a tremendous amount of water that will be used during grading. Is that water use used for grading going to be coming from recycled water?</p> <p><b>Density increase:</b> This land is zoned for 110 homes based on slope. Now they want 1745 residences. That is a 1600% increase.</p> <p>Now add in the 50 room Country Inn as well as the 200 bed group care assisted living facility. That brings the density to 1996 residences. Now we are looking at a 1900% increase in density from the new General Plan that was adopted in August 2011. The General Plan that took over 12 years and over 16 million dollars to complete.</p> <p><b>Traffic increase:</b> With all these residences as well as the 200 bed group care assisted living facility and 50 room Country Inn there will be many workers and many average daily trips. There is also the 90,000 square feet of commercial, office and retail space, plus a school.</p> <p>Can the streets handle this overload? Are there the necessary road improvements that will be needed by this project?</p> <p>Why do we even have a General Plan? Why did we spend so much time and so much money just to allow a General Plan amendment? Why are we allowing developers to destroy the General Plan?</p> <p>Sincerely,</p> <p>Allen F. Binns Karen Binns</p>	<p>18-3, cont.</p> <p>18-4</p> <p>18-5</p> <p>18-6</p> <p>18-2 (cont.)</p> <ul style="list-style-type: none"> <li>• Dedicated right-turn lanes at the westbound Gopher Canyon Road approach and the northbound East Vista Way approach to East Vista Way/Gopher Canyon Road intersection.</li> <li>• Intermittent turn lanes at major access locations along Lilac Road from Old Castle Road to Anthony Road including the segment between Robles Lane and Cumbres Road, and the intersection of Sierra Rojo Road and Lilac Road.</li> </ul> <p>The project does not include the widening of the West Lilac bridge; however, improvements will be made to accommodate projected traffic including paving, restriping, installation of a traffic signal at Old Highway 395 and West Lilac Road including construction of a left-turn lane at the westbound West Lilac Road approach to Old Highway 395 and West Lilac Road. This portion of West Lilac Road would be improved to meet the General Plan Mobility Element classification 2.2C, subject to exceptions as approved by the County (M-TR-4). Widening the bridge is not proposed as it would require tremendous engineering and coordination efforts by multiple jurisdictions including the County and Caltrans. Bridge widening would also be infeasible under CEQA due to engineering issues, and due to costs. Therefore, it is not considered a feasible option for inclusion in the project. As detailed in FEIR subchapter 2.7.2.4, an Evacuation Plan was prepared for the project (see Appendix K). The Evacuation Plan details measures for the evacuation of residents through Main Street, which connects West Lilac Road with existing evacuation routes to the south that provide access to the north, south, east, and west. The connector roadways are Old Highway 395, Circle R Drive, and I-15.</p> <p>18-3 Water supply for the project would come from the Valley Center Municipal Water District (VCMWD) which is imported from San Diego County Water Authority. Pursuant to Senate Bill 610 and Senate Bill 221, a Water Supply Assessment (WSA) was prepared for the project by the VCMWD (see Appendix Q of the FEIR). The WSA report evaluates water supplies that are or will be available during normal, single-dry year, and multiple dry water years during a 20-year projection to meet existing demands, existing plus projected demands of the project, and future water demands served by the VCMWD. Based on the VCMWD's water supply reliability analysis contained in the 2010 Urban Water Management Plan, the WSA concludes that the VCMWD would have adequate water supply to meet and exceed expected demands for a 20-</p>
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	<p>18-3 (cont.)</p> <p>year planning horizon, including the project. As discussed in the WSA report, the project would offset a portion of its water demand through development of 289 acre-feet/year of recycled water, 191 acre-feet/year of groundwater, and 323 acre-feet/year from water conservation efforts. Groundwater used is based on historic groundwater use from existing wells that would continue. With these offsets, the remaining imported water demand is 487 acre-feet/year, less than the existing imported water demand of 513 acre-feet/year.</p> <p>Grading is estimated to require approximately 4 million gallons of water a month, which would come from a combination of groundwater, recycled water, and/or imported water. The project at build-out will require over 12 million gallons of potable water per month and the WSA shows that water is available to serve the project at build-out. As a result, there would also be adequate water to supply the estimated 4 million gallons of water per month needed during grading.</p> <p>In addition, the VCMWD issued an updated letter dated May 6, 2014 verifying that the conclusions of the WSA are still valid considering recent drought conditions and associated water use restrictions. This letter has been included as a cover letter to Appendix Q of the FEIR.</p> <p>18-4 As this comment makes a general statement and does not raise an environmental issue under CEQA, a more detailed response is not required. The project would result in an increase in density compared to the existing General Plan; however, density calculations under the County General Plan and Zoning Ordinance do not include group care or hotels as noted by the commenter. 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>18-5 The project will result in an increase of average daily trips on area roadways. The impact of these trips on roadways and intersections was evaluated extensively in the FEIR. Refer to subchapter 2.3 and Appendix E of the FEIR for the complete analysis. As detailed in the FEIR and in response to comment 18-2 above, several improvements will be needed for this project and would be included as conditions of approval of the project.</p>
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RESPONSE

	<p>18-6 The comment provides factual background information, but does not raise an environmental issue within the meaning of CEQA. 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 with respect to the FEIR, no further response is required.</p>
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