I-423 James P. Wood

I -423-1 The commenter explains that they are writing with concerns regarding the Draft EIR. The commenter provides their military and educational background. The commenter explains that they are concerned about fire safety and accommodation of religious practices.

The County acknowledges the comment as an introduction to comments that follow. This comment is included in the Final EIR for review and consideration by the decision-makers prior to a final decision on the project. No further response is required or necessary.

I -423-2 The commenter explains that as the anti-terrorism officer, one of his duties was to assess the risk of fire. The commenter explains that the threat of fire in Southern California is High, which is the highest threat category, and without mitigation the risk to life and property is high. The comment says this risk applies to the Project and a fire evacuation plan should be included in the Project.

Potential impacts associated with fire hazards and evacuations have been adequately analyzed in Section 2.8 Hazards and Hazardous Materials as well as, Appendix N, Fire Protection Plan and Evacuation Plan. Mitigation has been provided when necessary to avoid or lessen potentially significant impacts. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I -423-3 The comment states that there are concerns regarding the few access routes in and out of the valley, which would be compromised from emergency services during a wildfire.

An evacuation plan was prepared as part of the Draft EIR, Appendix N-2. Refer to **Topical Response HAZ-1**. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I -423-4 The comment states that a "shelter in place" plan would not be viable due to smoke being trapped in the valley.

As stated on page 82 of Appendix N-1 (Fire Protection Plan):

> "This project is not to be considered a shelter in place community. However, the fire agencies and/or law enforcement officials may, during an emergency,

> as they would for any new community provided the layers of fire protection as Newland Sierra, determine that it is safer to temporarily refuge residents on the site. When an evacuation is ordered, it will occur according to pre-established evacuation decision points (as detailed in the Newland Sierra Evacuation Plan), or as soon as notice to evacuate is received, which may vary depending on many environmental and other factors."

Further as stated on page 13 of Appendix N-2 (Evacuation Plan):

> Like most new master planned communities incorporating ignition resistant construction, wide fuel modification zones, and providing defensibility throughout, responding fire and law enforcement personnel will be able to direct residents to temporarily refuge in their homes at Newland Sierra, in the rare situation where that alternative is determined to be safer than evacuating.

Although the Project is not a shelter in place community, safeguards have been implemented that would allow residents to refuge in their homes should it be determined safer than evacuation.

I -423-5 The comment states that the traffic congestion associated with a wildfire evacuation would be increased by the Project, which would prevent the response of emergency services and would obstruct evacuees from safety.

The County acknowledges the comment and notes it expresses the opinions of the commenter, and does not raise an issue related to the adequacy of any specific section or analysis of the Draft EIR. The Newland Sierra Wildland Fire Evacuation Plan (Appendix N-2 to the Draft EIR) anticipates the potential for bottlenecks, accidents, and other issues on roadways. On page 20, the plan indicates that the estimated evacuation times may be up to 2 hours, double that (4 hours), or more, if the wildfire scenario did not "enable pre-planned traffic management measures". Should this situation be realized, the Wildland Fire Evacuation Plan offers descriptions of contingency options that would enable evacuations to cease or be partially implemented, while residents are directed to remain in their ignition resistant, defensible homes for the short duration that wildfire would burn in the fuels at the outer edges of the Project's code exceeding, wide fuel modification zones.

As indicated in Sections 1.0, 2.0, and 6.0, of the Newland Sierra Wildland Fire Evacuation Plan, wildfires are fluid events that require situational awareness, scenario pre-planning, and contingencies. It is anticipated that the worst-case Newland Sierra evacuation would occur in a similar manner to many other San Diego County planning areas. In the event of a wildland fire in the area, evacuation and contingency plans are an early part of a wildfire's tactical planning process by an Incident

Command team. A contingency plan is one of the immediate priorities for development by Incident Command when a wildfire event occurs in a wildland-urban interface area. Community evacuation plans, like the Newland Sierra plan, will be integrated into the contingency planning process to assist and coordinate evacuation planning for all residents requiring evacuation. It must be recognized that wildfire and other emergencies are often fluid events and that the need for evacuations are typically determined by on-scene first responders or by a collaboration between first responders and designated emergency response teams, including Office of Emergency Services and the Incident Command established for larger emergency events. As such, and consistent with all emergency evacuation plans, this Emergency Evacuation plan is to be considered a tool that supports existing pre-plans and provides for citizens who are familiar with the evacuation protocol, but is subservient to emergency event-specific directives provided by agencies managing the event.

Please refer to Appendix N-1, Newland Sierra Fire Protection Plan (Dudek 2017) for details on the Proposed Project's redundant, layered fire protection system, that is consistent with designated shelter in place communities.

I -423-6 The comment states that an independent subject matter expert needs to conduct a study on the Project and their assessment should be included with an appropriate risk mitigation plan so the Project can be overhauled to prevent such an event from occurring. The commenter asks when such a study would be conducted.

Potential impacts associated with fire hazards and evacuations have been adequately analyzed in Section 2.8 Hazards and Hazardous Materials as well as, Appendix N, Fire Protection Plan and Evacuation Plan. Appendix N was prepared by a subject matter expert and reviewed by County experts. Mitigation has been provided when necessary to avoid or lessen potentially significant impacts. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. The County will include the comment as part of the Final EIR for review and consideration by the decision-makers prior to a final decision on the project.

I-423-7 The commenter explains that he is concerned for the Hidden Valley Zen Center, because Zen religious practice requires strict silence in order for meditation to be accomplished. The comment states that the Draft EIR did not provide a detailed sound study to determine impacts to practitioners at the Zen Center, and the failure to do so is a blatant attempt to deny the Zen Center their constitutional right. The comment states that no steps have been taken to ensure that the Zen Center's religious practices are accommodated by the Project. The commenter asks when such a study

would be conducted and what measures are being put in place to ensure that the practice of the members of the Zen Center is protected.

As stated on Section 2.10, page 2.10-16 of the DEIR:

> "The proposed project would include development of a variety of land uses on the project Site, including residential and commercial uses, a school, parks, and open space, as well as supporting on-site and off-site roadway and infrastructure improvements. Construction of these land uses and infrastructure improvements would occur in two phases, with construction estimated to begin in January 2018 and end in November 2027. Phase 1 is anticipated to begin in January 2018 and continue through December 2024. Phase 2 is anticipated to begin in December 2020 and continue through November 2027.
>
> Construction noise in any one particular area would be temporary and short-term. Construction noise typically occurs intermittently and varies depending on the nature of each phase of construction (e.g., demolition, site preparation, grading and excavation, building construction) due to the different types of construction activities such as hauling material via trucks, pouring concrete, and using power tools. Additionally, the noise levels generated by particular pieces of construction equipment, including earthmovers, material handlers, and portable generators, could reach high noise levels for brief periods.
>
> To assess the potential noise effects of construction, this noise analysis used data from an extensive field study of various types of industrial and commercial construction projects (EPA 1971). Noise levels associated with various construction phases in which all pertinent equipment is present and operating at a reference distance of 50 feet are shown in Table 2.10-15. Because of vehicle technology improvements and stricter noise regulations since the field study was published, this analysis uses the average noise levels shown in Table 2.10-15 for the loudest construction phase. This information indicates that the overall (hourly) average noise level generated on a construction site could be 89 dBA at a distance of 50 feet during excavation/grading and finishing phases. The noise levels presented are ranges; the magnitude of construction noise emissions typically varies over time because construction activity is intermittent and the power demands on construction equipment (and the resulting noise output) are cyclical. Typically, an 8-hour L_{eq} would be lower than an hourly L_{eq}.
>
> Project construction may also involve blasting to break up bedrock close to the ground surface. Typically, most of the noise generated by blasting is very

low in frequency—below the frequency range audible to humans. The use of impulsive noise equipment and construction activities that would result in impulse noise (e.g., pile driving or explosives blasting) is discussed later in this section.

In residential construction projects, grading activities typically generate the greatest amount of noise because this phase requires the largest and heaviest pieces of equipment. It is anticipated that the grading portion of Phases 1 and 2 of project construction would overlap, which could result in the worst-case construction noise scenario. Construction equipment used during the grading portion of Phase 1 could include crawler tractors, excavators, graders, loaders, drill rigs, water trucks, off-highway trucks, and scrapers.

Noise levels generated by construction equipment (or by any point source) decrease at a rate of approximately 6 dBA per doubling of distance from the source (Harris 1979). As the loudest construction activity associated with on-site construction of the proposed project would occur during excavating/grading and finishing, which is estimated to generate average noise levels of 89 dBA at 50 feet, at the rate of noise attenuation noted above, the on-site construction noise would be 83 dBA L_{eq} at 100 feet, 77 dBA L_{eq} at 200 feet, 71 dBA L_{eq} at 400 feet, and so on. This calculated reduction in noise level is based on the loss of energy resulting from the geometric spreading of the sound wave as it leaves the source and travels outward. Intervening structures that block the line of sight, such as buildings, would further decrease the resultant noise level by a minimum of 5 dBA. The effects of molecular air absorption and anomalous excess attenuation would further reduce the noise level from construction activities at more distant locations at the rates of 0.7 dBA and 1 dBA per 1,000 feet, respectively.

The closest existing residences to on-site construction activities would be the residences located in the mobile home park, south of the Town Center neighborhood. On-site construction would take place within approximately 100 feet of the mobile home park property line and approximately 181 feet from the nearest residence (see Figure 2.10-7, Nearest Existing Residential Receiver: On-Site Construction). Work on Mesa Rock Road and the southern portion of the Town Center neighborhood is anticipated to result in noise levels as high as 83 dBA L_{eq} at the nearest existing residential property line, 100 feet to the south. In addition, because the proposed project would be constructed in phases, there is a possibility that on-site residences would be occupied while subsequent building phases are under construction. Thus, construction could occur within approximately 50 feet of on-site NSLUs,

> generating average noise levels of up to 89 dBA. This assumes a direct line of sight from the receiver to the construction area. Because construction work is cyclical, the 8-hour average noise level would be lower. Nonetheless, the County's noise limit of 75 dBA (8-hour average) may still be exceeded at future on-site residences and at the residences south of Town Center when work takes place near existing residences.
>
> Construction staging areas would be located within the project Site. Staging areas during construction would be located within the proposed project limits at the maximum distance from existing sensitive receptors to the extent feasible. Construction equipment repairs, such as refueling and air filter replacement, would occur on Site. However, any major repairs would occur at an off-site location. All equipment repairs would be completed in the staging areas and would be conducted during the County Noise Ordinance's allowable hours and days of operation for construction. Additionally, the proposed project would implement PDF 33 through PDF 38 which would require properly maintained construction equipment with noise-reduction features (e.g., intake, exhaust mufflers, engine shrouds), use of electrical power tools, locating construction equipment staging areas away from residences and schools, and use of noise attenuation techniques (e.g., noise blankets and temporary barriers) to reduce noise levels to below 75 dBA L_{eq} at the property lines of existing residences. With implementation of these project design features, impacts from construction equipment noise would be **less than significant**."

The Hidden Valley Zen Center would be approximately 740 feet away from the proposed Valley Plan area.

Relative to the Sierra Farms Park, the park uses would be required to comply with all applicable County Noise Standards for park uses. Accordingly, it is not expected that the park would have a significant noise impact to surrounding land uses. The Final EIR has been revised to include a brief discussion of the potential for off-site noise impacts at the Sierra Farms Park. Please see Section 2.10 of the Final EIR.

Regarding operational traffic noise, the **Draft EIR** includes Sarver Lane in the off-site noise analysis. A receiver location (O9) is located at a church on Sarver Lane. From Section 2.10.3.1, of the Draft EIR:

> "At the church on Sarver Lane (Receiver O9), the traffic noise level is predicted to increase by 3 dBA from 54 dBA CNEL to 57 dBA CNEL with the proposed project. However, as noted above, an increase of 3 dBA or greater is considered a significant impact only if the site is a "documented

noisy site." In this case, both the existing and existing with project noise levels (54 and 57 dBA CNEL, respectively) would not exceed the County noise standard for churches of 65 dBA CNEL. …."

In recognition of the potential influence of traffic from Deer Springs Road on uses at the southern end of Sarver Lane (such as the church at Receiver O9) compared to residential uses further north on Sarver Lane, a supplemental analysis has been prepared to represent additional off-site NSLU on Sarver Lane. The following table shows the noise levels at receivers without the influence of traffic from Deer Springs Road.

	Modeled Noise Level Sarver Lane Only (dB CNEL)			
Receiver	*Existing*	*Future without Project*	*Future with Project – Opt B*	*Noise Level Increase - Future with Project vs. Future w/o Project*
Hidden Valley Zen Center	42	49	58	9
Resi Sarver Ln 1	42	46	54	8
Resi Sarver Ln 2	44	50	59	9
Resi Sarver Ln 3	43	49	58	9
Resi Sarver Ln 4	41	43	49	6
Resi Sarver Ln 5	41	44	52	8

As shown in this table, the predicted noise level increases are below the County's threshold of 10 dBA. While these noise level increases are greater than 3 dBA, they would not equal or exceed the County's Noise Compatibility Guidelines and Standards for the underlying land uses; thus, the impact remains less than significant as concluded in the Draft EIR. No revisions are required or necessary.

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