

From: Rusty
To: AdvancePlanning, PDS
Subject: Property Specific Requests General Plan Amendment, PDS2012-3800-12-005, PDS2014-REZ-14-006; LOG NO. PDS2012-Er-12-00-003; SCH NO. 2015121012
Date: Monday, February 12, 2018 2:21:24 PM

Dear Mr. Kevin Johnston,

I18-1 [My name is Russell Hayes and I live at [REDACTED] Via Cascabel in the Escondido area of the county. My wife, Donna, and I have lived here for nearly 20 years. Our property is adjacent to the "NC18-A" analysis area and we strongly oppose approval of the proposed zoning change, including the "alternative" request.

I18-2 [The entire 93 acre project is currently within a designated Agricultural Preserve and is zoned SR-2. According to citations in various county documents, this is the minimum density considered viable to support any agriculture operations. Our property is only 2.25 acres, but we maintain commercial avocado production with approximately 90 bearing trees.

I18-3 [The proposal would convert the great majority (the buildable portion) of the NC18-A parcel to SR-1, conflicting with county policy LU-7.1, which is supposed to "protect agricultural lands with lower-density land use designations" (p. 2.2-13). According to the subject report, the SR-1 land use designation was ruled out of the 2011 PEIR, stating that "any parcels smaller than one dwelling unit per acre have been calculated to result in a 100 percent conversion of agriculture resources to non-agricultural uses..." (p. 2.2-6). The report goes on in the same paragraph to say that "...an SR-2 designation is considered a 'lower-density' land use designation that supports continued agricultural operations for these PSR analyses." This NC18-A proposal does not support or comply with the protective intents noted above. It actually surrenders existing agricultural property to dense development. The NC18-A property is already zoned SR-2, so why is the county supporting this proposal?

I18-4 [While the proposal itself has significant impact on the direct conversion of agricultural resources, its impact on the indirect conversion of these resources is also very significant. Much of the surrounding property is SR-2 and much of this includes producing avocado groves. It is very likely that the proposed adjacent development of SR-1 properties would soon have a significant negative impact on the agricultural status of the adjacent property owners. The list of items referenced from the 2011 PEIR (farm practice complaints, pesticide use limitations, liability concerns, trespassing, theft, vandalism and others) are all in play. Depending on the particular crop pests in a given year, helicopter spraying of orchards and/or manual spraying of various materials are required to maintain production. These and other normal agricultural practices are certain to create tension and conflict with areas where dense populations exist.

I18-5 [Currently, this land is predominantly planted in citrus trees, with a section also used by farm buildings, container storage and a row-crop area. Conversion of this property into 1-acre subdivision lots would negatively affect the rural setting, contribute substantially to traffic on nearby roads, create emergency/fire access issues, increase noise pollution and significantly detract from the rural setting that we and our neighbors moved here to enjoy.

I/B-6

We strongly advocate that the NC18-A portion of this plan be denied. Please confirm your receipt of these comments and advise if additional opportunities for public comment are anticipated.

Best regards,
Russell & Donna Hayes



Responses to Letter I18, Hayes, Russell and Donna

- I18-1 This comment provides a brief introduction and notes the commenter's opposition to the proposed changes associated with the PSR Analysis Area NC18A Proposed Project Map and Alternative Map.

The commenter's opposition to the proposed land use designation change of PSR Analysis Area NC18A and the reduced project alternative is noted. This comment does not pertain specifically to the analyses in the Draft SEIR. No further response is required.

- I18-2 The County appreciates the comment and agrees with that portion of the comment that indicates the entire 93-acre PSR has a land use designation of SR-2 and is within a designated Agricultural Preserve area. The County also agrees that the last sentence of the first full paragraph on page 2.2-6 of the Draft SEIR states that SR-2 is considered a lower density land use designation that supports continued agricultural operations.

The last sentence of the comment does not pertain specifically to the analyses in the Draft SEIR. No further response is required.

- I18-3 This comment states that changing the land use designation of PSR Analysis Area NC18A from SR-2 to SR-1 conflicts with General Plan Policy LU-7.1, which aims to protect agricultural lands with lower-density land use designations.

The Draft SEIR concluded the change in land use from SR-2 to SR-1 would not be consistent with the lower density land use designations that support continued agricultural operations due to the increased edge effects associated with homes in such close proximity to this analysis area. The Draft SEIR further concluded that the NC18A Proposed Project Map is inconsistent with Policy LU-7.1, which was adopted in part for the purpose of avoiding or mitigating environmental impacts, as discussed in the 2011 GPU PEIR; and determined that the overall Proposed Project would result in a potentially significant impact regarding direct and indirect conversion of agricultural resources (Impacts AG-1 and AG-2).

The Department's recommendations (including for NC18A) will be determined prior to the hearing with the Planning Commission and made a part of Planning Commission Hearing Report and Board Letter.

- I18-4 The comment refers to analysis in the Draft SEIR of indirect conversion of agricultural resources and goes on to discuss how these impacts occur.

Please see response to comment I18-3 above. The Draft SEIR determined that the overall Proposed Project would also result in a potentially significant impact regarding indirect conversion of agricultural resources (Impact AG-2).

- I18-5 This comment describes existing conditions of PSR Analysis Area NC18A, and states that conversion of the property would result in adverse impacts on the rural setting, traffic conditions of nearby roads, emergency access, and noise.

The County acknowledges the comment. Section 2.1.3.3 describes potential impacts on visual character or quality within PSR Analysis Area NC18A. As described in the Draft SEIR, PSR

Analysis Area NC18A would have the potential to result in localized impacts on the visual character of the community, due to the proposed increases in allowed density and the minimal residential development in these areas now. In addition, NC18A is located within productive agricultural area. Therefore, impacts on visual character or quality associated with development of future projects with PSR Analysis Area NC18A (and others) would be potentially significant (Impact AE-3). The Draft SEIR provided several General Plan policies and mitigation measures to reduce impacts on the visual character or quality of the community; however, the County concluded that even with implementation of the policies and mitigation measures, potential impacts would remain significant and unavoidable.

Section 2.7.3.7 of the Draft SEIR provides an analysis of emergency response and evacuation plans for the PSR Analysis Areas. As described in the Draft SEIR, these areas may not have the infrastructure to provide adequate emergency response, and there is the potential for the proposed project to interfere with existing emergency response plans (Impact HZ-1). The Draft SEIR provided several General Plan policies and mitigation measures to reduce impacts on emergency response and evacuation plans, and determined that impacts would be reduced to less-than-significant levels.

Section 2.11.3.3 of the Draft SEIR provides analysis of the proposed project's potential impacts regarding permanent increases in ambient noise levels. As described in the Draft SEIR, PSR Analysis Area NC18A is not located within an existing roadway noise contour and is not identified as exceeding the County's noise compatibility guidelines (refer to Tables 2.11-2 and 2.11-6). As shown in Table 2.11-14, only one roadway segment that was analyzed in the North County Metro Subregional Plan area had an increase of 1 dB CNEL, which is not considered significant. However, future discretionary projects implemented under the proposed project would likely be required to conduct a project level Noise Impact Analysis to analyze the potential for impacts to roadway noise levels and for conformance with the Noise Ordinance.

Section 2.15.3.1 of the Draft SEIR analyzed potential project impacts to traffic and Level of Service (LOS) Standards. As shown in Table 2.15-4, the proposed density increase for NC18A would generate an additional 340 ADT and other proposed PSRs in the North County Metro Subregional area would increase ADT by 1,470. These potential increases in ADT did not contribute to any direct impacts in the North County Metro Subregion, associated with the overall Proposed Project (by pushing roads into failing LOS); however the increases were considered to have a potential cumulative impact (Impact TR-5, Section 2.15.4.1).

- I18-6 The comment reiterates the commenter's opposition to the proposed changes for the NC18A PSR Analysis Area.

Comment noted. Staff will notify the commenter of any additional opportunities for public comment including notifications for Planning Commission and Board of Supervisors hearings.