

Letter C1q

Geology, Hydromodification, & Specific Plan Technical Documents 1

DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP)

Lilac Hills Ranch

**Geology Report and Supplemental Geology Report**

What is the county rationale for not requiring a final Geology Report as part of the DEIR in view of the many undocumented fills still to be investigated referenced in this report?

Excavation Characteristics 5.1.1 describe the need for blasting which cannot be quantified to determine the amount and length of time needed to do removals and ultimately placement of fills. Silicates potentially will be a hazard with regard to AQMD standards.

Slope Stability and Remediation describe cut slopes 6.2.1 and fill (manufactured) slopes 6.2.2 in excess of seventy (70) feet in height. There are no seventy foot high manufactured slopes existing in this community which makes these proposed slopes out of character with the community.

The off-site proposed improvements include but are not limited to the

Widening of West Lilac roads adjacent the Maxwell Bridge 700 feet, Old Highway 395 between Gopher Canyon and Circle "R" and Covey Lane from the intersection of West Lilac all have had minimal review.

The installation of approximately 2570 feet of forced sewer main will require additional investigation and review once easements are established.

**Hydromodification Management Plan (HMP)**

Detention basins construction prior to, during and post construction need to be clearly described as to how they coordinate with the phasing plan. The grading plans, geology reports and HMP have yet to be subject to plan check oversight and current County grading ordinance. The county grading ordinance limits and restricts the quantity of total area exposed at any one time.

Since County environmental restricts percolation of sewer into disturbed material or placed fills, what is the county rationale for not requiring clarification in the DEIR of how the construction phasing would comply with all county standards.

3.0 Effects Found Not Significant During Initial Study

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C1q-1 The Geology Report (Appendix N-1) and Supplemental Geology Report (Appendix N-2) of the FEIR are final versions of those reports. Undocumented fills were evaluated as a part of the geology reports, and the presence of undocumented fills does not preclude the final status of the reports.

The existence of undocumented fills is addressed in the reports. Undocumented fill is a mapped soil type associated with previous on-site grading. As explained in FEIR subchapter 3.1.1, undocumented artificial fills are located throughout the project site and are associated with past and present land use, including residential construction, farming operations, private roadway construction, local water retention embankments, utility construction, pad areas, and other associated land uses.

Both reports contain recommendations for grading and construction. These recommendations include the removal of all undocumented fill material in designed fill areas and/or where exposed in cuts. The removal of this fill is ensured as all grading must be accomplished under the observation and testing of the project Geotechnical Consultant and the County codes.

C1q-2 The requirements and extent of blasting and rock removal are identified in the FEIR project description (subchapter 1.2.1.10).

Potential impacts of crystalline silica due to blasting are discussed in FEIR subchapter 2.2.2.4 (Air Quality). As concluded in the FEIR, the short-term generation of crystalline silica during blasting and grading would not result in a significant impacts or a substantial concentration of pollutants affecting local sensitive receptors based on the duration of blasting and quantity of rock to be blasted for the project.

C1q-3 With respect to slope stability, as shown in FEIR Figure 2.1-1, the project site contains several existing slopes exceeding 70 feet in height. As discussed in the Geology Report prepared for the project (FEIR Appendix N), the highest proposed cut slope is approximately 70 feet at a slope ratio of 2:1. The highest proposed fill slope is approximately 70 feet. All manufactured slopes exceeding a ratio of 5 to 1 (horizontal to vertical), the ground will be keyed or benched over 50 feet in height and are designed with benches every 40 feet. No impacts are expected to occur. Additional specific project design features for slope stability and remediation are detailed in Section 6.2,

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	<p>C1q-3 (cont.)          FEIR Appendix N. The application of these recommendations would reduce potential impacts associated slope stability to less than significant.</p> <p>C1q-4 The Supplemental Geology Report (Appendix N-2) addresses off-site improvements proposed by the project, including West Lilac Road widening, Old Highway 395 improvements, Covey Lane widening, and the Mountain Ridge Road sewer force main. This Supplement Geology Report addresses the potential geologic issues required by the 2007 County Guidelines for Determining Significance – Geologic Hazards. The off-site improvement analysis was completed at the same level as the project site. The FEIR subchapter 3.1.1 was revised since 2013 to discuss both the on- and off-site areas together. Refer to the current subchapter 3.1.1.</p> <p>C1q-5 As indicated in the previous response, Supplemental Geology Report (Appendix N-2) and the FEIR subchapter 3.1.1 addresses the proposed Mountain Ridge Road sewer force main improvements.</p> <p>C1q-6 Detention basins shown are conceptually depicted on the Preliminary Grading Plan and would be phased as needed to control flows to existing levels. Detention basin phasing would be developed further with each implementing TM and the associated grading plans for that TM. As required, the TM grading plans and associated reports would be required to comply with the County Grading Ordinance. The grading plans, geology reports, and HMP prepared to address the Master Tentative Map have been reviewed by the County and are consistent with the Grading Ordinance.</p> <p>C1q 7 This project does not propose to percolate sewage into disturbed material or placed fills during construction or operations. Thus, an analysis of each construction phase sewer percolation is not warranted.</p> <p>C1q-8 To clarify, FEIR subchapter 3.2.4 addresses the CEQA Guidelines Appendix G land use issue question of if the project would physically divide an established community. In other words, this FEIR subchapter addresses if the project would result in a physical barrier that would block existing travel between two areas of an existing community. The existing site does not serve as a connection for the existing rural community.</p>
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<p style="text-align: center;">Geology, Hydromodification, &amp; Specific Plan Technical Documents <span style="float: right;">2</span></p> <p>3.2.24 The project does not introduce a new village but does negatively impact the existing village of rural agricultural residences. Existing infrastructure would be lost and any new infrastructure would change the entire complexion and burden the "Rural Agricultural Economy" that exists. Any new development would restrict accepted practices of farming further increasing the fiscal impact. This is not a fringe of an existing community which becomes very clear when you review all the impact studies which extend to the eastern boundaries of the community.</p> <p><b>Specific Plan &amp; Technical Documents</b></p> <p>Implementing Grading Plan Sheet 1-9</p> <p>The plans are preliminary and the general notes lack clarification of detail, i.e.:</p> <p>Item 13</p> <p>Removal of all septic systems. County environmental requires the installation of vertical wells into a leach field to replace any loss to existing leach fields if possible. Not all easements have been secured to allow for the removal of all septic systems which will impact design.</p> <p>Item 14</p> <p>What is the county rationale for not requiring lighting standards impacting adjacent properties to be consistent with the current use of those properties?</p> <p>The existing Village of agricultural businesses do not have light standards that are associated with high density bedroom communities.</p> <p>Item 15</p> <p>What is the county rationale for allowing a reference to a TM plan that does not yet exist in the DEIR?</p> <p>exist where easements have not been vacated, quitclaimed or extinguished is too preliminary an exercise to attempt to determine if the plan will work once it is submitted to the governing agency for plan check approval.</p> <p>Item 16</p> <p>Regarding the containment of storm water. There</p> <p>As it is subject to NPDES (National Pollution Discharge Elimination System) and the SWPPP (Storm Water Pollution Protection Plan), what is the county rationale for not</p>	<p>C1q-8 (cont.) Thus, the construction of the project would not divide an established community. The FEIR subchapter 3.2.4 acknowledges the existing rural community and the analysis was clarified subsequent to this 2013 comment. Refer to the current FEIR subchapter 3.2.4.</p> <p>C1q-9 The purpose of the preliminary grading plan is to show the limits of disturbance and to show proposed elevations/grades for the project. It is not intended for construction purposes. During final engineering, much more detailed grading plans will be processed with the County of San Diego to obtain a grading permit in compliance with the County's grading ordinance.</p> <p>C1q-10 Any septic systems that would be removed as a part of the project are associated with existing homes that would also be removed as part of the project. The project does not remove septic systems of any existing homes that are not part of the project. As the project would not need to replace any losses to existing leach fields, the project would not require the installation of vertical wells.</p> <p>C1q-11 The project would comply with County lighting standards, including the San Diego Light Pollution Code and County Zoning Ordinance. Refer to FEIR subchapter 2.1.2.4 and FEIR Table 1-3.</p> <p>C1q-12 The FEIR adequately analyzes the potential environmental impacts associated with construction of the off-site physical improvements as required under CEQA. With respect to related property rights, please see Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties. Please also see Global Response: Easements (Covey Lane and Mountain Ridge Roads) for additional information responsive to this comment.</p> <p>C1q-13 Please refer to response to comment C1q-9. Detailed hydromodification plans are required by the County to obtain a grading permit in compliance with the County's Grading Ordinance and will be prepared during final engineering.</p>
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<p>requiring a detailed phasing plan tied directly to the hydromodification management plan? } C1q-13 cont.</p>	<p>C1q-14 This comment does not address the environmental analysis provided in the project FEIR. It is included in the project's FEIR for the decision makers to consider.</p>
<p>Implementing Preliminary Grading Plan &amp; Implementing Tentative Map (Phase 1) }                  These proposed plans reflect a permutation of an existing rural farm "Village" with high density housing which does not exist anywhere in the community. } C1q-14</p>	<p>C1q-15 Please refer to response to comment C1q-3 and C1q-9. The County inspector will ensure that grading is completed in compliance with the County's grading ordinance, including the amount of open grading.</p>
<p>The plans reflect manufactured slopes from 3' to 70' in height. The county grading ordinance requires landscaped coverage and limits the amount of open grading activity at one time. Q. How will this phasing be accomplished? } C1q-15</p>	<p>C1q-16 See response to comment C1q-12, above.</p>
<p>Letters of permission to grade and easements are still outstanding. Q. }                  What is the county's rationale for not requiring the project to provide a clear plan to accommodate outstanding easements if they are not secured? } C1q-16</p>	<p>C1q-17 The grading contractor would be required to fence the limits of disturbance prior to work. This measure along with a biologist to monitor the construction activities would ensure that the blue line streams remaining would not be affected and the riparian corridors maintain functionality. Construction best management practices would be employed to maintain water quality. Refer to FEIR Table 1-3, which includes project design features that would be included in the project's conditions of approval.</p>
<p>With restrictive grading standards how will "Blue Line" streams and migratory corridors be maintained? } C1q-17</p>	<p>C1q-18 Please see response to comment C1q-1.</p>
<p>What is the county's rationale for proceeding with the DEIR review process as the geotechnical reports are still incomplete? } C1q-18</p>	<p>C1q-19 The extensive biological surveys conducted on the property did not identify any vernal pools and none are expected to occur on the site as the soil conditions and topography are not conducive for the formation of vernal pools.</p>
<p>there are no provisions for vernal pools if they are identified. Q. How will they be preserved? } C1q-19</p>	
<p>The plans do not identify any cultural interest or features such as "midden area's" or burial sites. Q. When will these issues be addressed? } C1q-20</p>	<p>C1q-20 Cultural resources have been addressed in the cultural resources technical report and the FEIR subchapter 2.6. Locations of midden areas and burial sites or other sensitive cultural resources are confidential and are not placed on any plans for public review.</p>
<p>What is the county's rationale for not requiring the project to provide alternatives proposed on the revised plan since the proposed shallow 4" forced main sewer meanders thru both private and public land? } C1q-21</p>	<p>C1q-21 See response to comment C1q-12, above.</p>
<p>Q. With regard to the NPDES, RWQCB, AQMD and Fish and Game, when will the SWPPP that typically accompanies the grading plans with plan check submittals be available for review? } C1q-22</p>	<p>C1q-22 The SWPPP is a construction document that is prepared at the grading permit stage. Therefore, a SWPPP will be prepared as grading permits are processed for each. SWPPPs are uploaded to the SWRCB website and are public records that anyone can review. As part of the SWRCB permit, the SWPPP must always be uploaded and on-site prior to any construction.</p>