

COMMENTS

RESPONSES



1 Civic Center Drive
San Marcos, CA 92069-2918

Telephone
760.744.1050
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June 15, 2015

Ms. Beth Ehsan
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, California 92123

Re: Comments Regarding Draft Environmental Impact Report (PDS2013-ER-08-002);
PDS2013-SP-13-001, PDS2013-GPA-13-001, PDS2013-STP-13-003, PDS2013-TM-
5575, PDS2013-REZ-13-001, & PDS2014-MUP-14-019;
326-Unit Residential Subdivision;
West of Country Club Drive; APNs: 228-313-13, 232-013-01, 232-013-02, 232-013-03,
232-020-55, 232-492-01, 232-500-18, 232-500-19, 232-500-20, 232-500-21, 232-500-22,
232-500-23, & 235-031-41.

Ms. Ehsan,

Thank you for giving the City of San Marcos an opportunity to comment on the Draft Environmental Impact Report (EIR) for a 326-Unit residential subdivision. The following comments are based upon the Draft EIR posted on the County website at http://www.sandiegocounty.gov/pds/ceqa_public_review.html. The subject property is located on the eastern City limit boundary.

I. Comments by City Planning Division:

- a. The amount of landform modification for the proposed hillside lots on the western portion of the subdivision should be reduced. Lot layout should conform with the natural terrain. The height of graded slopes is excessive. Slopes should typically be graded at a 2:1 ratio, and undulated to provide a natural appearance. All slopes should be landscaped with a mixture of trees, shrubs, and ground cover prior to occupancy of the first building.
- b. Properties directly to the west (in the City) are designated as very-low residential (0.125 to 1 du/ac). The proposed hillside lots on the western portion of the subdivision are much smaller in size, and do not provide an adequate transition in lot size from very-low density to the west to higher density to the east.

F-1 The comment is introductory and is not at variance with the environmental document.

F-2 The comment indicates that: (1) the amount of landform alteration in the western portion on the Project should be reduced, (2) lot layout should conform to natural terrain, (3) slopes should be graded and 2:1 and undulated, and (4) slopes should be landscaped.
Consistent with this comment, Project manufactured slopes would not exceed a 2:1 ratio. Lot layout generally conforms to the underlying natural terrain. As depicted on EIR Figures 2.1-9 and 2.1-11, the Project pads would follow the rising topography, and would not result in a single flat development pad. As a result, the underlying topography would be respected. Figure 1-4b illustrates how much of the site would be left ungraded and how tightly the grading conforms to the minimum necessary to support the residential structures. Also as seen, the Project

F-1

F-2

F-3

F-2
cont. streets along which residences would be located curve naturally to follow existing hillside shapes, thereby resulting in undulating slopes. Landscaping is additionally addressed in the last paragraph of this response, following additional information on landform alteration.

Most of the houses would be sited within the valley, while steeper slopes and hills within and surrounding the site would remain undeveloped. As described in EIR Subchapter 2.1, there are approximately 35.6 acres of slopes on the property which meet the definition of steep slopes under the County’s RPO (i.e., slopes with a natural gradient of 25 percent or greater and a minimum rise of 50 feet). This represents approximately 15 percent of the Proposed Project site. As described in Subsection 2.1.2.2, the Project would impact only approximately 1.1 acres of RPO steep slopes. This would occur in a total of 16 lots/areas with steep slope encroachment, with an average encroachment of approximately 5.4 percent. All lot grading would conform to the RPO.

Landscaping in each area would include a mixture of trees, shrubs and groundcovers appropriate to the location on site and the abutting vegetation, as shown on Figure 1-25 of the EIR. This landscaping would be installed following grading and prior to residential occupation. This landscaping would be maintained by the Valiano Homeowners’ Association (HOA), and would not be subject to individual lot management. This would be a Condition of Project approval. To the extent that any newly broken rock would be visible from City residences (or other County and City of Escondido residences to the east), please note that Mitigation Measure M-AE-1, which would be a Condition of the Project, requires “exposed newly cut rocks shall be stained to soften and screen the appearance of the manufactured slopes.”

F-3 The comment indicates that the Project lots are smaller than the lots in San Marcos and that there is not an adequate transition. The change in elevation between the County lots and the lots in San Marcos, together with the landscaped nature of the slopes between them provides an adequate transition.

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2. Comments by City Engineering Division:

- a. Figure 6-8 of the Specific Plan depicts offsite Vallecitos Water District improvement options through the Casitas Del Sol Mobile Home Park in the City of San Marcos. A condition should be placed on this project to require any improvements required within the City of San Marcos' jurisdiction shall be reviewed and approved by the City of San Marcos.
- b. In regards to the Traffic Impact Analysis prepared by Linscott, Law and Greenspan (dated April 10, 2015), the applicant should verify if a horizon year intersection analysis was performed. In addition, the applicant's cumulative project list should be revised to include the Rancho Coronado (Hanson) and DMV projects.

3. Comments by San Marcos Fire Protection District:

- a. Fuel Management Plan is required. A 150' fuel modification is required from all sides of all structures. The plan to be approved by this office. The plan must be implemented before final approval of project.
- b. The applicant shall provide an addendum to San Marcos Fire Department 'Community Wildfire Protection Plan'. This addendum shall evaluate the WUI fire risk of the Valiano Development (what risk is when development is complete) and categorize area of this development into type of hazard (extreme risk, very high, high, etc.) The Applicant shall utilize the consultant previously used by San Marcos Fire Dept. to provide this info: Anchor Point LLC Consultants. The report shall be forwarded to San Marcos Fire Protection District-Fire Marshal upon completion.
- c. Provide a Resource Management Plan for wetland area as previously required.
- d. All access roads shall provide a minimum of 24 foot paved and usable road width. No parking will be allowed on roads 24 feet wide. Roads shall be designed to support the imposed loads of fire apparatus, approximately 75,000lbs.
- e. Hill Valley Rd. shall be improved to provide separate means of emergency access for fire department. A minimum 24 foot wide paved road, meeting design criteria will be required.
- f. Each dwelling shall be equipped with a residential fire sprinkler system that complies with 2013 edition of NFPA-13D. Plans shall be submitted to Parsley Consulting; fire sprinkler plan review consultant for San Marcos Fire Protection District.

F-4 The comment recommends that off-site improvements in the City of San Marcos' jurisdiction shall be reviewed and approved by the City of San Marcos. Any off-site improvements within the City of San Marcos will be submitted to the City for review and approval.

F-5 In response to the commenter's question, the Project's TIA (Appendix H of the EIR) did include a horizon year analysis. Please see Section 10.0 of the TIA for more information.

F-6 In response to the commenter's request, the Rancho Coronado project was included as cumulative project #28 in the Project TIA. The DMV project located on Rancheros Road would not add a large amount of traffic to the Project cumulative traffic study area because it is located approximately 6 miles from the Project site and would add fewer than 10 peak hour trips to any study area intersection. Also, the DMV project has access to SR 78 at Rancho Santa Fe Road and therefore would not use the Project study area intersections. In addition, 31 other projects within the City of San Marcos were included in the near term cumulative analysis, many of which are speculative and/or would be built out over many years. For these reasons, adding the DMV project as a cumulative project does not change the conclusions in the EIR

F-7 A Wildfire Protection Plan is not required per Comment F-27 and a valid Fire Protection Plan has been prepared for the Project and has been approved by the SMFD .

F-8 As noted in Response F-27, an addendum to the Community Wildfire Protection Plan is no longer required.

F-9 Contrary to the comment, the letter from SMFD Fire Marshal dated June 16, 2015 states a separate Resource Management Plan is not required for the Proposed Project. The FPP (Appendix L of the EIR) that has been approved by the district would govern the vegetation management adjacent to wetland areas through the Valiano HOA.

F-10 The comment indicates that all access roads shall be a minimum 24-foot wide, that no parking shall be allowed on the 24-foot-wide roads, and that they shall support fire apparatus loads. All access roads would meet these conditions except for a portion of Hill Valley Drive that would be 20 feet wide. As described in Response E-6, the SMFD has found this width to be acceptable. Hill Valley Drive would be improved to private road standards (24 feet paved width) if the right of way or easement

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| F-10
cont. | becomes available for use or purchase; it would then be used as a day-to-day access and not only for emergency purposes. Improvements for Hill Valley Drive as an alternative access road are listed in Subsection 2.8.2.10 of the EIR. |
| F-11 | As noted in your letter, Comment F-25 supersedes this comment. See Response E-6. |
| F-12 | The FPP includes fire sprinkler systems, consistent with the commenter's requests, in Section 4.3.1. |

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- F-13 g. Install bronze residential fire hydrant(s) at location(s) required by fire department. The minimum fire flow required is 1,500gpm for two hours. See other notes below:
 - (1) Installation of all fire hydrants for this project shall be per local Water District and Fire Dept. specifications, whichever is applicable. Hydrant Type shall be Jones or Clow with one, 4-inch connection and one, 2-1/2 inch connection.
 - (2) Fire Hydrant blue dot markers shall be installed to indicate location of all fire hydrants served by this project.
 - (3) Project Engineer shall set-up appointment with Fire Marshal to discuss fire hydrant locations. Hydrants shall be shown on a map.
- F-14 h. Use of Building Materials shall comply with Enhanced Construction design using San Diego County Building Code.
- F-15 i. Any automatic gates are required to have a Knox rapid entry system and emergency vehicle strobe detector.
- F-16 j. Provide monument signs in key locations as determined by San Marcos Fire Department
- F-17 k. Prior to delivery of combustible building construction materials to the project site all of the following conditions shall be completed to the satisfaction of the Fire Department:
 - (1) All wet utilities shall be installed and approved by the appropriate inspecting department or agency.
 - (2) As a minimum the first lift of asphalt paving shall be in place, prior to delivery of combustible materials on site; to provide a permanent all weather surfaces for emergency vehicles.
 - (3) All fire hydrants shall be installed, in service and accepted by the Fire Department and applicable water district.
- F-18 l. All new developments and any existing development where construction necessitates updating of emergency response maps by virtue of new structures, hydrants, roadways or similar features, shall be required to provide map updates in one of the following formats (AutoCad, DWG, DXF, ESRI shapefile, ESRI) and shall be charged a reasonable fee for updating all response maps.

- F-13 Regarding g.(1), the FPP includes fire hydrant specifications in Sections 4.3.3 and 4.3.4. Regarding g.(2), the FPP includes blue dot markers in Section 4.3.10. Regarding g.(3), fire hydrant locations are shown on the Tentative Map, and the Project team has met with the Fire Marshall on several occasions. Fire hydrant locations would be further refined during final design of the Project, when the Fire Marshall would have an opportunity to review the Project improvement plans. This information is consistent with the EIR.
- F-14 In response to this comment, the FPP has been revised to add “enhanced” to Section 4.6.
- F-15 The FPP includes Knox rapid entry systems and strobe detectors in Section 4.2.8.
- F-16 The FPP has been revised to address monument signs and the revised sentence in Section 4.11.9 reads: “Directory signs shall meet all San Marcos Fire Department Guidelines and an illuminated directory shall be placed at each of the three entry points to the development.”
- F-17 Regarding k.(1), the FPP includes the installation and approval of wet utilities in Section 4.3. Regarding k.(2), the FPP addressed the first layment of asphalt prior to delivery of combustible materials in Section 4.2.7. Regarding k.(3), the FPP addressed fire hydrant installation in Section 4.3.9. This information is consistent with the EIR.
- F-18 The comment indicates that developments with construction that necessitates updating of emergency response maps shall provide map updates to the City. AutoCAD DWG files of the Project design would be provided to the City during final design of the Project and the appropriate fee would be paid at that time. No changes to the EIR resulted from the comment.

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- F-19 m. Signs reading “NO PARKING FIRE LANE” are required for public and private streets that are 24 feet or less in width. The number of, placement and wording for all fire lane signs and/or red curbs shall be as required by *CA. Vehicle Code, section 22500.1, 22658(a)* and San Marcos Fire Protection District –(fire dept. shall approve sign locations).
- F-20 n. All parcels within the project area must be annexed into Cities Community Facilities District (CFD) before any building plans will be approved.
- F-21 o. Update the Valiano Specific Plan to include the following information:
 - (1) All tree Canopies shall be spaced so crowns of all mature trees maintain a 30 foot horizontal separation. This applies to both fire resistant and non-fire resistant trees.
 - (2) Trees and vegetation shall be maintained so branches and limbs provide a minimum vertical clearance of 13 feet 6 inches above ground at all times.
 - (3) No pine trees or similar flammable vegetation shall be planted within the project boundaries.
- F-22 p. Requirements for Homes with Reduced Defensible Space. The following construction mitigation requirements shall be met for each dwelling within the Valiano Development that provides more than the 100 foot defensible space, but less than the 150 foot defensible space required by San Marcos Fire Protection. These requirements exceed chapter 7a of 2013 CBC and the Enhanced Construction requirements of San Diego County Fire Authority. All construction and landscape requirements listed below shall be met for specific dwellings.
 - (1) All dwelling with less than 150 feet defensible space shall be called out on a separate plan sheet in plan submittal. The plan sheet for these dwelling units shall list the following requirements shown below in items 2 thru 13.
 - (2) Exterior Walls of dwellings shall be two-hour fire rated. Provide a detail sheet on plan that identifies two-hour rated exterior walls as approved by I.C.C. Evaluation Services.
 - (3) All roofs shall be Class ‘A’ material. Roof or floor coverings for patio covers or balconies shall also be Class A’ rated or non-combustible material.
 - (4) All eaves, overhangs or projections shall be non-combustible material. No exposed wood allowed.
 - (5) All Windows shall be dual pane, with both window panes being tempered glass. This also applies to any skylights being installed.

F-19 The FPP addressed this in Section 4.2.3.

F-20 The comment indicates that the Project must be annexed into the San Marco Fire Protection District Community Facilities District (CFD). The Project is annexing to and paying for the fire related CFD and joining the facility district does not require LAFCO approval; therefore, no change to the EIR is required. Note that LAFCO annexation to the SMFD would be required for one of the Project lots (see Response B-3).

F-21 The comment recommends the Valiano Specific Plan include specific information regarding types of plant material, spacing of canopies, and minimum vertical clearance for fire safety. Section 5.4, *Fire Protection*, of the Valiano Specific Plan refers users to the FPP and states: “The Valiano Fire Protection Plan (FPP) identifies requirements for fire protection for future development within the Plan area. Those requirements are incorporated by reference into the Valiano Specific Plan.” The Valiano FPP was approved by the County and the San Marcos Fire Protection District. Incorporation of the approved FPP by reference into section 5.4 of the Valiano Specific Plan demonstrates the Specific Plan is consistent with FPP.

F-22 The comment recommends construction mitigation requirements for dwellings that provide more than 100 feet of defensible space but less than 150 feet. Regarding (1), the Fuel Treatment Location Map in the FPP illustrates structures with less than 150 feet of defensible space. Regarding (2) through (7), the FPP addresses these comments in Section 4.6. Regarding (8) through (13), the FPP addresses these comments in Section 4.7.

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- (6) All vents shall be Ember-Resistant type with Baffles; Brandguard, O'Hagan or equivalent. No vents shall be on side of dwelling facing vegetation.
- (7) Any accessory attachments or structures such as patio covers, decks, partially enclosed exterior patios; sheds play structures, etc; shall be non-combustible or heavy timber and comply with OSFM requirements for fire resistive materials.
- (8) Exterior fire sprinklers will be required for any projection from dwelling that exceeds four feet in width and/or length.
- (9) All spaces of dwelling shall be sprinklered throughout; including attic and concealed spaces, closets or other areas.
- (10) Exterior fences attached to dwellings shall be non-combustible material.
- (11) No fire pits will be allowed. Enclosed exterior fireplaces may be allowed on case by case basis.
- (12) New Trees shall be planted a minimum of 40 feet from dwelling. No tree canopy at full maturity shall grow within 20 feet of any wall of dwelling. Trees shall be planted in a manner that tree canopies at full maturity shall be spaced a minimum of 30 feet from each other.
- (13) Any new vegetation planted shall be fire resistive, drought tolerant and meet SD County list of requirements for plants, shrubs and trees.

Please notify the City when the environmental document is available for public review and future public hearings. If you have any questions, please contact me at (760) 744-1050, extension 3236, or npedersen@san-marcos.net

Sincerely,



Norm Pedersen
Associate Planner

F-22
cont.

COMMENTS

RESPONSES

Ehsan, Beth

From: Scott, Robert <RScott@san-marcos.net>
Sent: Tuesday, June 16, 2015 3:00 PM
To: Ehsan, Beth
Subject: letter regarding outdated FD comments for Valiano project
Attachments: FD comments_Error_6-16-15.doc

Beth,

Please see attached letter regarding Valiano Project and outdated FD comments you recently received from San Marcos Planning Dept. I inadvertently gave Norm Pedersen from our Planning Dept. the initial FD comments that were written on this project approx. one year ago; and mistakenly did not provide revised comments.

My apology for the confusion. Let me know if I can assist further.

Respectfully,

Robert Scott
Division Chief
Fire Prevention
Office: 760-744-1050 ext. 3404
Mobile: 760-402-3976
Rscott@san-marcos.net
City of San Marcos



F-23 The letter from SMFD Fire Marshal dated June 16, 2015 states that Comments F-7 through F-22 were prepared a year ago and did not contain the revised comments from SMFD.



June 16, 2015

Ms. Beth Ehsan
 County of San Diego
 Department of Planning and Land Use
 5201 Ruffin Rd.
 San Diego, CA.

Subject: Outdated San Marcos Fire Department Comments for Valiano Project

Dear Ms. Ehsan,

Recently the City of San Marcos Planning Department provided a list of comments to the County in response to the proposed Valiano Project located in San Marcos Fire Protection District. A few of the fire department comments that were provided with this recent information from the city were outdated comments that were sent in error. Please accept my apologies for the confusion. Although most fire department comments you received are applicable today, there were several older comments sent with the recent city response that do not apply. These specific items are summarized below and reflect current fire dept. requirements:

1. Hill Valley Road is a tertiary access road and is allowed to be 20 feet wide in certain areas and 24 feet wide in other areas. See copy of attached letter dated 09/24/2014.
2. A Resource Management Plan is not required.
3. A wildfire protection plan by Anchor Point is not required. The applicant provided a valid Fire Protection Plan from Firewise 2000. This plan has already been accepted with revisions by San Marcos Fire Protection District.
4. Trees- Any new trees planted on slopes or other areas shall be spaced according to San Diego County Planning and Fire Department standards.

The items shown above are key areas of concern that were not properly reflected in the fire department comments you recently received. Again these were sent in error. If there are questions regarding these items or the project in general, please contact me at 760-744-1050, ext. 3404

Sincerely,

Robert Scott

Robert Scott
 Division Chief, Fire Marshal

- F-24 The letter from SMFD Fire Marshal dated June 16, 2015 states that Comments F-7 through F-22 were outdated. The letter showed specific items and current SMFD requirements for the Proposed Project.
- F-25 The comment indicates that Hill Valley Drive is allowed to be 20 feet wide in certain areas. The FPP contained in Appendix L of the EIR has been revised to address this comment. See Response E-6.
- F-26 The comment indicates that a Resource Management Plan is not required. This issue is discussed in Response F-24.
- F-27 The comment indicates that a Wildlife Protection Plan is not required. This issue is discussed in Response F-24.
- F-28 The comment indicates that trees shall be spaced according to County planning standards and fire department standards. The FPP has been revised to address this comment with a clarification to Section 4.5.1.14 that new trees planted on slopes and other areas shall be planted according to the County Consolidated Fire Code and SMFD standards.
- F-29 The comment indicates that Comments F-24 through F-29 were not properly reflected in previous fire department comments. This issue is discussed in Response F-24.



September 24, 2014

Ms. Beth Ehsan
County of San Diego
Department of Planning & Land Use
5201 Ruffin Rd.
San Diego, CA.

SUBJECT: Fire Department Access for Valliano Project

Dear Mrs. Ehsan,

As you know, the Valliano project proposes the development of over 300 homes in an area served by San Marcos Fire Protection District. Hill Valley Rd. is an existing dirt road that is proposed to be improved to a paved road approximately 24 feet wide, for a majority of the road length. One section of this road (approx. 185 -195 foot length) can only be improved to 20 feet wide due to easement access issues. The San Marcos Fire Protection District will accept this section and 185 foot length of road at 20 feet wide. The developer shall prepare and submit a fire access road plan to San Marcos Fire Department that identifies road widths along the entire length of Hill Valley Rd. The fire department will review and approve this plan upon satisfactory submittal.

Improvements to Hill Valley Rd. (entire length) shall meet the following criteria: The road shall be an all weather paved surface; be able to support an imposed load of 75,000lbs, or 32,000 lb single axle loading. The road shall be 24 feet wide, with exception of area mentioned above that may be 20 feet wide, as shown on fire access road plan approved by San Marcos Fire Protection District. Please feel free to contact me directly if you have any concerns at 760-744-1050, x3404.

Respectfully,


Robert Scott
Division Chief - Fire Marshal