



THE CITY OF SAN DIEGO

# ENVIRONMENTAL IMPACT REPORT

Project No. 586670  
SCH No. 2018041032

**SUBJECT: THE JUNIPERS:** The City of San Diego has prepared an Environmental Impact Report to evaluate the effects of the Junipers project. The project includes a Site Development Permit, Planned Development Permit, General Plan Amendment, Community Plan Amendment, CIPOZ, Rezone, Vesting Tentative Map, Sewer Easement Vacation and Variance from the Inclusionary Housing Regulations to develop 536 residential units on a vacant 112.3-acre property adjacent to 14455 Peñasquitos Drive. The project entails the development of a vacant property (non-operational golf course) to create a residential subdivision with 455 multi-family attached and detached residences for those aged 55 and above, a three-story building with 81 senior affordable multi-family apartments, a 2.87-acre (net) public park, privately owned/publicly accessible 2.75-mile "Social Loop" trail, 0.52-acre privately owned/publicly accessible park with mobility amenities, other private open space/parks and recreational amenities for project residents' use, and internal streets. Retaining walls around the site perimeter would vary from 3 to 12 feet high. The residential privacy barriers along the eastern edge of the property will be designed to also protect project uses from I-15 noise. The project would be fully landscaped and would incorporate a variety of sustainable design features. Utilities to serve the project are available in the immediate vicinity. Vehicular access to the project site would be provided from Peñasquitos Drive at the existing intersection with Janal Way, and from a new right-in only access road off of Carmel Mountain Road (including provision of a new deceleration lane for right-turning traffic and an emergency-only egress right-out lane from the project site onto Carmel Mountain Road). The project would provide a roundabout at Janal Way/Peñasquitos Drive/Project Access and a traffic signal at Cuca Street/Peñasquitos Drive/Hotel Karlan Driveway. The project also would improve and retain an existing fire/emergency access/egress connection from Del Diablo Street to the northwestern portion of the project site, as well as an existing off-site emergency access/egress between Andorra Way and Corte Raposo. As part of the project approval, a General Plan Amendment is needed to change the designated land use from "Open Space" to "Residential" and an amendment to the Rancho Peñasquitos Community Plan is needed to change the on-site designated land uses to a combination of Low-Medium Density Residential (i.e., 5 to 10 dwelling units per developable acre), open space, and parks, including both a



public neighborhood park and private development parks/recreational facilities, some of which would have public access easements. The project also proposes a zoning change from residential and commercial zones RS-1-14 and CV-1-1 to residential and open space zones RM-1-1, RM-3-7, OR-1-1, and OP-1-1. A Community Plan Implementation Overlay Zone would be placed over the residentially zoned portions of the site to require discretionary review of site development proposals. Permits will be required from the Army Corps of Engineers and the Regional Water Quality Control Board to impact and reestablish an unvegetated ditch that runs through the eastern portion of the site. The project site is located on approximately 112.3 acres, in an existing residential neighborhood located west of I-15, north of Carmel Mountain Road, and east of Peñasquitos Drive in the community of Rancho Peñasquitos in the City of San Diego. (LEGAL DESCRIPTION: Parcel 3 of Parcel Map No. 21621, in the City of San Diego, County of San Diego, State of California, filed in the office of the County Recorder of San Diego County on September 13, 2018 as Instrument No. 2018-7000350 of official records.) APPLICANT: Carmel Land LLC.

UPDATE: **January 22, 2021. Clarifications/revisions, additional information, and typographical corrections have been made to the final Environmental Impact Report when compared to the draft environmental document. In accordance with Section 15088.5 of the California Environmental Quality Act, the addition of new information that clarifies, amplifies, or makes insignificant modifications and would not result in new impacts or no new mitigation does not require recirculation.**

**Pursuant to Section 15088.5(a) of the CEQA Guidelines: "Significant new information" requiring recirculation includes, for example, a disclosure or additional data or other information showing that:**

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.**
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.**
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.**
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.**

**The modifications made to the final environmental document do not affect the analysis or conclusions of the Environmental Impact Report. All revisions are shown in a ~~strikeout~~ and/or underline format.**



## ENVIRONMENTAL DETERMINATION:

This document has been prepared by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department and is based on the City's independent analysis and conclusions made pursuant to 21082.1 of the California Environmental Quality Act (CEQA) Statutes and Sections 128.0103(a), 128.0103(b) of the San Diego Land Development Code.

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Transportation/Circulation, Visual Effects/Neighborhood Character, Noise, Air Quality, Greenhouse Gas Emissions, Energy, Biological Resources, Hydrology and Water Quality, Geology and Soils, Historical and Tribal Resources, Public Utilities, Public Services and Facilities/Recreation, and Health and Safety.**

The EIR concludes that the project would result in less than significant environmental impacts with implementation of mitigation measures with regard to **Transportation/Circulation, Biological Resources, Historical and Tribal Cultural Resources and Health and Safety.** All other impacts analyzed in the EIR were found to be less than significant.

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

## DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency. Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

### Federal Government

U.S. Fish and Wildlife Service (23)  
U.S. Environmental Protection Agency (19)  
U.S. Army Corps of Engineers (26)

### State of California

CA Governor's Office of Planning and Research State Clearinghouse (46A)  
California Department of Transportation District 11 (31)  
California Department of Fish and Wildlife (32)  
Cal EPA (37A)  
California Regional Water Quality Control Board, Region 9 (44)  
Department of Water Resources (45)  
California Highway Patrol



City of San Diego

Mayor's Office

City Attorney (93C)

Councilmember Kersey, District 5

Central Library (81A)

Rancho Penasquitos Branch Library (81BB)

Development Services Department

EAS

Permit Planning

Landscape

Map Check

Transportation

Engineering

Geology

Project Manager

Planning Department

Plan Facilities Financing

Park Planning

Long Range Planning

Historical Resources Board (87)

Transportation Development (78)

Wetlands Advisory Board (91A)

Fire-Rescue Department

Parks & Recreation Department

Public Utilities Department

San Diego Housing Commission (88)

Other Interested Groups, Organizations, and Individuals

Rancho Penasquitos Planning Board (380)

Gary Akin, SDG&E (381)

Rancho Penasquitos Town Council (383)

Sierra Club (165)

San Diego Audubon Society (167)

Mr. Jim Peugh (167A)

California Native Plant Society (170)

Endangered Habitats League (182A)

San Diego Natural History Museum (166)

Carmen Lucas (206)

South Coastal Information Center (210)

San Diego Archaeological Center (212)

Save Our Heritage Organisation (214)

Ron Christman (215)

Clint Linton (215B)

Frank Brown – Inter-Tribal Cultural Resources Council (216)

Campo Band of Mission Indians (217)

San Diego County Archaeological Society, Inc. (218)

Kumeyaay Cultural Heritage Preservation (223)



Kumeyaay Cultural Repatriation Committee (225)  
Native American Distribution (225 A-S)  
Native American Heritage Commission (222)  
Rincon Band of Luiseño Indians  
Air Pollution Control District (65)  
County of San Diego Department of Environmental Health (76)  
County of San Diego Department of Environmental Health, Vector Control Program  
San Diego Association of Governments  
DeLano & DeLano for PQNW Action Group  
PQ-NE Action Group, Junaid Razvi  
Matt Bettencourt  
Dale Politte  
Joe Pierzina  
Shari Collins  
David Kenstad  
Karen Jokela  
Lynn Lundy  
Donna Gutekunst-Lundy  
Tom Lovorn  
Genie Lovorn  
Shahryar Shahryant  
Kymberli Clement  
Robert Laird  
Mark Dodson  
Jeff Keefer  
Karen Keefer  
Kathy Paulsen  
Don Paulsen  
Jeanine Politte  
John Denear  
Sharon Denear  
Lisa Petrillo  
Robert Scally  
Clark Scally  
Ava Scally  
Elaine Wilson  
Gilberto Rodriguez  
Don Barrett  
Stephanie La Motte  
Eugene Alfoldy  
Judy Revey  
Mike Slaven  
Pence (Hugh) and Susan Parsons  
Roswitha Jorgensen  
Jeff Wilson  
Dave Munson  
Monique Langley



Geri Huss  
Ian Kenny  
Patty Clack  
Cindy Krask  
Paul Krask  
Justine Nielsen  
Kevin McGuire  
Thomas Clark  
Damian Quintanilla  
Joseph Schmelzer  
Todd Derbique  
Elvarista Perez  
Ziad Tarazi  
Lauren Tarazi  
Maureen Hamilton  
Judy Day  
Nels Lundgren  
Kirsten Kung  
C Kung  
A Kung  
Paul La Motte  
Dan Jacobs  
Josi Jacobs  
Kirsten Poehlmann  
Dorinda Payton  
Marlys Houck  
Shari Collins  
Nancy Denen  
K Kung  
Phillip Hoos  
Sarah Clayton  
Seth Humphreville  
Daniel Cicchelli  
Jodi Haight  
Cyndy Macshane  
Travis Evans  
Stephan Haight  
Steve Stone  
Veronica Kenny  
Bernard Marstall  
Lorraine Marstall  
Paula Harrison  
Mike Shoecraft  
Mike Sloven  
Yuri Koral  
Tim Leha  
Joe Pierzina



Wendy Shalar  
Heidi Kove  
Mariella Birdsall  
Trevor Diacosta  
Chris Slaven  
Brent Garriepy  
Melanie Rodriguez  
Ronson Kung  
Donna Pierzina  
Daniel Jacobs  
Resul Senturk  
Alyssa Senturk  
Jennifer Reitz  
Tim Clayton  
Miriam Sliter  
David Birdsall  
Thy Hoang  
Jon Pak  
Diane Alfoldy  
Mike Denen  
Helen Abjanic  
John Abjanic  
Izyaslav Aris  
Kim Arnold  
Ron and Debra Askeland  
Chuck Bane  
Tina Becharas  
Jon Becker  
Anita Bertain  
Matt Bettencourt  
Ryan Betts  
Simran Bindra  
Damon Bitts  
Ramona Broekema  
Paul Brooks  
Earl Brown  
Laurie Brown  
Shirley Bruno  
Corey Buckner  
Katrina Buco  
Daniel Buzzard  
Steve case  
Christina Catalano  
Mary Chambers  
Kwang Chan Yoo  
Sarah Chavez  
Ron Cho



Tara Cicchelli  
Guy Close  
Jackie Close  
Angela Cobb-Danielly  
Kathryn Coffelt  
Stanley Cohen  
Steven Cook  
Jenny Creson  
Maggie DaCosta  
Mary Denaci  
Jack Eaton  
Terry Edwards  
Stephen Egbert  
Melissa Ellefsen  
Dale Endreson  
Rich Escamilla  
Richard Evert  
Mark Fay  
Marina Fomenkov  
Mary Ann Fortin  
Anne Fraser  
Marijo Gallina  
Elma Garcia  
Jen Garner  
Maria Gill  
Jamie Goodwin  
Jeff Gridley  
Greg Grinaker  
Pete Grover  
Vonnie Grover  
Gordon Grubbs  
Carl Gunderson  
Jennifer (Jenny) Hamm  
Bob Hansen  
Steve Hassett  
Juanita Hawkins  
Amy Herrera  
Douglas Higgins  
Thomas Hillary  
Kelvin Ho  
Steve Horn  
Casey Humphreville  
Julie Islitzer  
Josi Jacobs  
Ellen Jaffe  
Howard Jann  
Steve Jansen



John Jaskowiak  
Mary Kelly  
Victoria Kim  
Karen Kinard  
Kernie Kohlmyer  
Marlene Kremer  
Cheryl Krukowski  
Rob Lapp  
Elisabeth Leatherberry  
John Lee  
Tricia Lewis  
Eric Lin  
Pam Logemann  
Rick Logemann  
Jocelyn Lomahan  
Rachelle Marchbanks  
Jack Marine  
Marjie Marine  
Joanne Markart  
Elizabeth Mather  
Karlene McCabe  
Susan McClatchey  
Katy McClelland  
Matthew McGinniss  
Wayne McKinnon  
Kari Meissner  
James Meredith  
Jay Michael  
David Michan  
Jeff Moffatt  
Touraj Momeni  
Mark Morgan  
Chachi Mueller  
Steve Mummy  
Gaurav Nandola  
Heeral Nandola  
Lynette Nasseri  
Lisa Neale  
Huong Nguyen  
Jenni Nguyen  
Tim Nguyen  
Trinh Nguyen  
Alan Noblitt  
Sue Noblitt  
Keith Nyberg  
James (Jim) Nylander  
Kerry Oatman



Maria Osante  
Dargash Ostad  
Jen Palkovic  
Marco Panattoni  
Janet Patay  
Darshana Patel  
Geoffrey Patrick  
Bev Peacock  
Ted Petroff  
Brooke Pietz  
Kathy Piper  
Cheryl Quackenbush  
Taletha Queen  
Alexis Quiroz  
Kathy Quiroz  
Tom Reimers  
Vivian Reynolds  
Julie Rivard  
Bonnie Roberson  
Celeste Rodriguez Mastacouris  
Andrea Rosati  
Kirk Rummel  
Silva Salehi  
Amy Salinas  
Will Sauntry  
Christy Schiltz  
Irina Schmelzer  
Bob (Robert) Schmidt  
Gary Schram  
Tressa Schultze  
Donna Scott  
Mary Scott  
Mike Setnan  
Pamela (Pam) Shotwell  
Joan Smith  
Terri Stafford  
William Stafford  
Shelley Stapley  
Robert Stoddard  
Vera Stoddard  
Pavla Taylor  
Georgia Theofan  
Patrick Thomas  
Annie Thornes  
Erika Thornes  
Dave and Sharon Tooley  
Phily Tsai

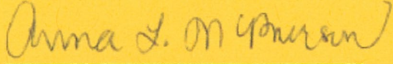


Melinda Vasquez  
Cha Vilorio  
Pat Wada  
David and Karen Watier  
Elizabeth Willey  
Chris Wolfe  
Alan Yaghdjian  
Ron & Gina Youngren  
Peggy Zenger  
Ryan Dalton and Mengni Zhu  
Cristina  
DG  
Jackson  
John Chiu  
Joan Commons  
Dan Cichelli  
Pamela Bane  
David and Lynn Delgado  
Gina Betts  
Andrew Bortolutti  
Bob and Lorraine Hansen  
Pat Harris  
Brian Hollandsworth  
Philip Hoos  
Gary and Virginia Jackson  
Sunita Juneja  
Valerie Lew  
Nels Lundgren  
Barbara Melabranche  
Brian Meredith  
Geoffery Patrick  
Judy Piercey  
Roland Pietsch  
Danny Redfern  
Tara Selhorn  
Lin Siepert  
Simone Sigell  
Darlene Simmons  
Mike Slavin  
David J. Tooley  
Karen Vogue  
Karen Wilmoth



**RESULTS OF PUBLIC REVIEW:**

- ( ) No comments were received during the public input period.
- ( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- ( X ) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

  
\_\_\_\_\_  
Anna McPherson  
Program Manager  
Development Services Department

February 10, 2020  
Date of Draft Report

January 22, 2021  
Date of Final Report

Analyst: Sara Osborn



# The Junipers Project

## Final Environmental Impact Report

SCH No. 2018041032; Project No. 586670

January 2021

*Prepared for:*



**Development Services Department**

1222 First Avenue, MS 501

San Diego, CA 92101



The Junipers Project  
Final Environmental Impact Report  
SCH No. 2018041032 - Project No. 586670

---

Comments and Responses to  
Comments on the Draft EIR

January 2021



## Public Review Letters

The following comment letters were received from agencies, organizations, and individuals during the public review of the Draft Environmental Impact Report (Draft EIR). A copy of each comment letter along with corresponding staff responses has been included. Letters and responses are provided in side-by-side format for ease of reader review.

Comment letters were received from the 60 agencies, organizations and individuals shown on the matrix below. Several comment letters received during the Draft EIR public review period contained requests for revisions that resulted in minor changes and text clarifications to the Draft EIR text. These changes to the text are indicated by ~~strikeout~~ (deleted) and underline (inserted) markings in the Final EIR or Errata. Some of the comments do not pertain to the adequacy of analysis in the Draft EIR or to other aspects pertinent to the potential effects of the proposed project on the environment pursuant to CEQA. Regardless, a good faith effort has been made by the City to respond to the comments submitted where they may touch on environmental analyses.

Certain responses have been identified as “Topical Responses,” as described and listed below the list of commenters.

Letter Identification	Commenter	Address	RTC Starting Page
<b>State Agencies</b>			
S1 California Department of Fish and Wildlife	David Mayer Environmental Program Manager	3883 Ruffin Road San Diego, CA 92123	1
S2 California Department of Transportation	Maurice Eaton Branch Chief, Local Development and Intergovernmental Review Branch	4050 Taylor Street, MS-240 San Diego, CA 92110	8
S3 California Highway Patrol	T. Cooper Captain, Commander	5902 Kearny Villa Road San Diego, CA 92123	13
S4 State Clearinghouse	CEQAnet	P.O. Box 3044 Sacramento, CA 95812 <a href="https://ceqanet.opr.ca.gov/">https://ceqanet.opr.ca.gov/</a>	14
<b>Regional Agencies/Organizations</b>			
R1 County of San Diego Department of Environmental Health, Vector Control Program	Michelle Price Program Coordinator, Vector Control Program	5570 Overland Avenue Suite 102 San Diego, CA 92123	20
R2 San Diego Association of Governments	Katie Hentrich Associate Regional Energy/Climate Planner	401 B Street Suite 800 San Diego, CA 92101	22
R3 San Diego County Archaeological Society	James Royle Chairperson, Environmental Review Committee	P.O. Box 81106 San Diego, CA 92138	25



Letter Identification	Commenter	Address	RTC Starting Page
<b>Special Interest and Individuals</b>			
SI1 DeLano & DeLano for PQ- NW Action Group	Everett Delano	104 West Grand Avenue Suite A Escondido, CA 92025	26
SI2 Individual	John Chiu	john.chiu.5@gmail.com	44
SI3A and B Individual	Stephan Haight	14624 Wye Street San Diego, CA 92129	52/80
SI4 Individual	Todd Derbique	11235 Del Diablo Street San Diego, CA 92129	87
SI5 Individual	Joan Commons	14625 Wye Street San Diego, CA 92129	95
SI6 Individual	Melissa Ellefsen	melissa.ellefsen@gmail.com	109
SI7 Individual	Dianne Alföldy	15525 Andorra Way San Diego, CA 92129	110
SI8A and B Individual	David Birdsall	dnbirdsall@gmail.com	113/115
SI9 Individual	Dan Cichelli	11251 Del Diablo Street San Diego, CA 92129	118
SI10 Individual	Tim Clayton	timster@san.rr.com	122
SI11 Individual	Kymerli Clement	kc@kcdesigndev.com	126
SI12 Individual	Kathryn Coffelt	11413 Meknes Way San Diego, CA 92129	127
SI13 Individual	Shari Collins	11045 Madrigal Street, San Diego, CA 92129	128
SI14 Individual	Pamela Bane	p_l_bane@yahoo.com	146
SI15 Individual	Judy Day	judyday@san.rr.com	149
SI16 Individual	David and Lynn Delgado	15715 Andora Way San Diego, CA 92129	150
SI17 Individual	Gina Betts	11344 Alamazon Street San Diego, CA 92129	151
SI18 Individual	Andrew Bortolutti	sddru_1@hotmail.com	153
SI19 Individual	Christina Catalano	15357 Calle Juanito San Diego, CA 92129	154
SI20 Individual	Bob and Lorraine Hansen	14515 Janal Way San Diego, CA 92129	156
SI21A to C Individual	Pat Harris	14397 Janal Way San Diego, CA 92129	161/165/174
SI22 Individual	Brian Hollandsworth	brian.hollandsworth@gmail.com	180
SI23 Individual	Philip Hoos	philliphoos@gmail.com	185
SI24 Individual	Gary and Virginia Jackson	gjackson4344@gmail.com	192
SI25 Individual	Sunita Juneja	11387 Ajanta Court San Diego, CA 92129	196
SI26 Individual	Kirsten Kung	14723 Penasquitos Drive San Diego, CA 92129	198



Letter Identification	Commenter	Address	RTC Starting Page
<b>Special Interest and Individuals (cont.)</b>			
SI27 Individual	Valerie Lew	vlew@sandi.net	200
SI28 Individual	Genie Lovorn	14895 Penasquitos Court San Diego, CA 92129	202
SI29A and B Individual	Tom Lovorn	14895 Penasquitos Court San Diego, CA 92129	204/209
SI30 Individual	Nels Lundgren	14421 Yazoo Street San Diego, CA 92129	212
SI31 Individual	Katy McClelland	katymcc@hotmail.com	219
SI32 Individual	Barbara Melabranche	15589 Paseo Jenghiz San Diego, CA 92129	224
SI33 Individual	Brian Meredith	briankmeredith@gmail.com	228
SI34 Individual	Keith Nyberg	10959 Guadalupe Way San Diego, CA 92129	231
SI35 Individual	Geoffery Patrick	geoff@san.rr.com	235
SI36 Individual	Judy Piercey	14898 Penasquitos Court San Diego CA 92129	242
SI37 Individual	Joe Pierzina	15145 Andorra Way San Diego, CA 92129	246
SI38 Individual	Roland Pietsch	rpietsch55@gmail.com	248
SI39A to G Individual	Dale Politte	11146 Amazon Street San Diego, CA 92129	249/252/278/306/ 313/319/330
SI40 Individual	Jeanine Politte	11146 Amazon Street San Diego, CA 92129	334
SI41 Individual	Elaine Wilson	10951 Guadalupe Way San Diego, CA 92129	347
SI42 Individual	Danny Redfern	redferndanny@hotmail.com	348
SI43 Individual	Tara Selhorn	tara.selhorn@gmail.com	352
SI44 Individual	Lin Siepert	14555 Yukon Street San Diego, CA 92129	355
SI45A to E Individual	Simone Sigell	simoneaj.sigell@gmail.com	357/358/360/ 361/364
SI46 Individual	Darlene Simmons	dgs5188@gmail.com	365
SI47 Individual	Mike Slavin	slavenwy4@gmail.com	369
SI48 Individual	Shelley Stapley	14655 Wye Street San Diego, CA 92129	370
SI49 Individual	David J. Tooley	11375 Nawa Way San Diego, CA 92129	372
SI50 Individual	Karen Vogue	14788 Carmel Ridge Road San Diego, CA 92128	375
SI51 Individual	Karen Wilmoth	6657 Valjean Court San Diego, CA 92111	388



Letter Identification	Commenter	Address	RTC Starting Page
<b>Special Interest and Individuals (cont.)</b>			
SI52A Individual/PQ-NE Action Group	Junaid Razvi	14829 Penasquitos Court San Diego, CA 92129	389
SI52B Individual/PQ-NE Action Group	Junaid Razvi	14829 Penasquitos Court San Diego, CA 92129	406

Certain responses are identified as “Topical Responses,” covering issues that were addressed by multiple commenters. In order to minimize duplication, one compiled response was created to address all comments on the issue, and other commenters were then referred to that topical response regarding their comments on the same or a similar issue. The following matrix summarizes the topical responses, including the issue covered and the location within the responses where each topical response may be found.

Response Topic	Commenter/ Letter No.	Comment No.	RTC Page No.
Trip Rate Methodology	DeLano / SI1	2	27
Freeway Mainline and On-ramps Thresholds	DeLano / SI1	4	28
Cumulative Projects Addressed in the EIR	DeLano / SI1	5	29
Community Plan Amendments	DeLano / SI1	8	31
Vehicular Trip Distribution	Chiu / SI2	5	48
Project Benefits	Haight / SI3A	1	52
Tennis Courts and Alternative Recreational Amenities	Haight / SI3A	2	53
Project Alternatives and Zoning	Haight / SI3A	3	55
Housing Need and Site Utilization	Haight / SI3A	5	58
Climate Change and Public Transportation	Haight / SI3A	14	64
Community Plan Implementation Overlay Zone/Potential for Future Proposals	Haight / SI3A	16	69
Intersection Improvements	Haight / SI3A	20	71
Black Mountain Open Space VHFHSZ	Haight / SI3A	25	76
Wildfire Evacuation Planning	Derbique / SI4	1	87
Quality of Life	Derbique / SI4	6	93
Project Age Qualifications	Commons / SI5	13	103
Peñasquitos Drive Vehicular Queue Lengths	Commons / SI5	15	105
Lack of Need for Additional I-15 Interchanges	Birdsall / SI6	2	113
Vehicular Counts and Peak Hour Periods	Cicchelli / SI9	1	118
Fire Behavior Modeling	Cicchelli / SI9	3	119
Andorra Way Emergency Operations/Maintenance	Collins / SI13	4	129
Wildlife Corridors	McClelland / SI31	2	219



## COMMENTS

## RESPONSES



State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 South Coast Region  
 3883 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
 www.wildlife.ca.gov

GAVIN NEWSOM, Governor  
 CHARLTON H. BONHAM, Director



April 3, 2020

Sara Osborn  
 City of San Diego  
 1222 First Avenue, MS 501  
 San Diego, CA 92101

**Subject:** The Junipers (PTS NO. 586670) (PROJECT) Draft Environmental Impact Report (DEIR) SCH# 2018041032

Dear Ms. Osborn:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from City of San Diego for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup> CDFW previously submitted comments in response to the Notice of Preparation of the DEIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

#### CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

#### PROJECT DESCRIPTION SUMMARY

**Proponent:** City of San Diego (City)

**Objective:** The objective of the Project is to develop 536 residential units on a former golf course. The residential subdivision would include 455 multi-family attached and detached residences, and 81 multi-family apartments, a public park, public access trail, open space, a 2.87-acre public park, a recreation amenity for residential use, and internal streets. A General Plan Amendment is needed to change the designated land use from Open Space to Residential to be consistent with the underlying residential zoning (RS-1-14) on the site, and the existing, underlying zoning would be changed to RM-1-1. An approximate 2.5-mile pedestrian "social loop" trail would be developed

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

S1-1 Comments noted. These comments do not address the adequacy or accuracy of the analyses in the Draft EIR and do not require a response.

S1-1



## COMMENTS

## RESPONSES

<p>S1-1 cont.</p> <p>Sara Osborn City of San Diego April 3, 2020 Page 2 of 5</p> <p>and maintained within the project and would include a site development permit, community plan amendment, rezone, and vesting tentative map.</p> <p><b>Location:</b> The proposed project is on a 112.3-acre property adjacent to Rancho Peñasquitos Boulevard. The project site is in an existing residential neighborhood located west of Interstate 14, north of Carmel Mountain Road, and east of Peñasquitos Drive in the community of Rancho Peñasquitos.</p> <p><b>Timeframe:</b> Construction is anticipated to take approximately 40 months, beginning with demolition in 2020 and finishing in mid- to late 2023.</p> <p><b>COMMENTS AND RECOMMENDATIONS</b></p> <p>CDFW offers the comments and recommendations below to assist City of San Diego in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.</p> <p><b>I. Environmental Setting and Related Impact Shortcoming</b></p>	
<p>S1-2</p> <p><b>Would the Project conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</b></p> <p><b>COMMENT #1:</b></p> <p><b>Issue:</b> The western Project site border is within 1,000 feet of the Multi-Habitat Planning Area (MHPA), which has Land Use Adjacency Guidelines regarding non-native plants.</p> <p><b>Specific impact:</b> As specified in Section 1.4.3 Land Use Adjacency Guidelines in the SAP, "no invasive non-native plant species shall be introduced into areas adjacent to the MHPA." While the Project is not directly adjacent to the MHPA, its western boundary at its closest point is within 1000 feet of the MHPA. Measures should be taken within the proposed Project's public park and various open space areas to avoid introduction of non-native species.</p> <p><b>Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)</b></p> <p><b>Mitigation Measure #1:</b></p> <p><b>To minimize significant impacts:</b> To minimize potential for non-native plants to reach the MHPA, CDFW recommends incorporating native plant species into all open space areas and any proposed landscapes throughout the Project. Although these on-site areas are small, landscaping with native plant species may create pockets of habitat that provide connectivity (i.e., stepping-stone habitat) for bird and pollinator species in the open space areas east and west of the Project site.</p>	<p>S1-2</p> <p>As shown in Figure 3 of the project's Biological Resources Letter Report (Appendix F) and explained in Section 5.1.1.2 of the EIR, at its closest point, the portion of the Open Space that is designated MHPA is approximately 690 feet from the project site, with existing homes, Peñasquitos Drive, and a City reservoir property separating the project from this MHPA area. Staff agrees with the commenter that the project is not directly adjacent to the MSCP and therefore the City's MHPA Land Use Adjacency Guidelines (LUAGs) do not apply to the project.</p> <p>However, Section 5.8.5 of the EIR explains that the project would restrict non-native invasive plant species and incorporate native plant species into the private HOA open space and landscaping around the site perimeter (see Figures 5.3-5 b through n). A streetscape plant palette containing native species also would surround the publicly accessible game courts and seating areas in the mobility zone (see specifically EIR Figure 5.3-5f).</p>



## COMMENTS

## RESPONSES

S1-2	<p>(cont.) Species proposed throughout the site include California sycamore, western cottonwood, Gooding's willow, coast live oak, Engelmann oak, common yarrow, agave, coyote brush, California brittlebush, California buckwheat, California flannel bush, yucca, toyon, San Diego marsh elder, prickly pear, California coffeeberry, lemonade berry, and San Diego County viguiera. The Neighborhood Park has already undergone the City's GDP process, and the plant palette for the Neighborhood Park is required to meet City standards. Based on the project landscape plan (as shown in EIR Figures 5.3-5a-n), incorporation of non-invasive species, and implementation of the public park pursuant to the approved GDP concept plan and City standards, no mitigation is required. Additionally, as shown in EIR Figures 3-1, <i>Illustrative Site Plan</i>, and 3-3, <i>Proposed Lots and Zoning</i>, in Section 3.0 of the EIR, the arrangement of the project's open space components would allow for the movement of birds and pollinator species through the site and between other open space areas to the east and west of the site. Thus, the open space component of the project, as designed, would provide suitable "stepping-stone habitat" for bird and pollinator species, as referenced in the comment.</p>
------	--



Sara Osborn  
City of San Diego  
April 3, 2020  
Page 3 of 5

## II. Cumulative Impacts to Black Mountain Open Space Park

### COMMENT #2:

**Issue:** Biological resources in Black Mountain Open Space Park will likely be put under pressure as a result of increased use.

**Specific impact:** As indicated in our comment letter on the Notice of Preparation for the Project, dated May 8, 2018, the Rancho Peñasquitos Community Plan includes several open space and resource management goals that, "require that long- and short-term maintenance responsibilities on open space areas be clearly defined as part of the development approvals," (Black Mountain Open Space Park Natural Resource Management Plan, p. 15). The proposed Project would introduce 536 new residential units within the Peñasquitos planning area. Previously, the planning area identified the approximately 112.3-acre proposed project site as a golf course. Neither the community plan nor the Black Mountain Open Space Natural Resource Management Plan anticipated, nor provided funding to address, the increased level of use that the proposed project would introduce to the Black Mountain Open Space Park.

**Why impact would occur:** Construction of new housing developments in the Peñasquitos planning area will increase the level of use in Black Mountain Open Space Park and put pressure on associated biological resources.

### Recommended Potentially Feasible Mitigation Measure(s)

#### Mitigation Measure #2:

**To minimize significant impacts:** As indicated in our 2018 comment letter, given the increased use of the area and commensurate pressure on wildlife associated with the proposed project, we recommend that no additional trails be established, and illegal trails be decommissioned. The proposed Project should contribute its proportional share of funding, commensurate with proposed development density (e.g., per unit), toward achieving all of the Park Maintenance Projects (p. 56) of the Black Mountain Open Space Natural Resources Management Plan.

### ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB\\_FieldSurveyForm.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

S1-3 Excluding the Neighborhood Park, which would be deeded to and maintained by the City following its construction by the project, the project would provide for future HOA maintenance of open space and trails within the project site, which fulfills the Rancho Peñasquitos Community Plan recommendation to define maintenance responsibilities within open space as part of development approvals. Please refer to EIR Figure 3-10a and 3-10b, as well as 3-11 for locations and variety of recreational amenities proposed by the project. As shown, the project proposes publicly accessible active and passive park and open space uses that would provide recreational opportunities for the future residents of the project as well as residents within the existing community, and would help to meet the recreational needs of the community. The project's relationship to Black Mountain Open Space Park (BMOS) is discussed in EIR Section 5.13.1.4, *Parks and Recreation Areas*, including acknowledgement of the BMOS trailheads. Further, the BMOS Natural Resource Management Plan (NRMP) is the implementing plan for the BMOS pursuant to the MSCP Subarea Plan and provides guidance for the City's habitat management and maintenance of the BMOS and MHPA lands. It does not apply to the proposed project. The project does not propose any new trails in the BMOS and proposed on-site trails do not connect directly to the BMOS given the distance and existing development between the proposed project and the BMOS. As described in Section 6.A, *New Development*, of the NRMP, no future development within the BMOS could occur without City approval, including subsequent CEQA analysis and MSCP compliance. Management and maintenance of the BMOS is the responsibility of the City of San Diego Park and Recreation Department, Open Space Division, with funds allocated annually



## COMMENTS

## RESPONSES

S1-3 (cont.) to the City Park and Recreation budget, as described in the BMOS NRMP, Section 11.C. No significant impacts were assessed to City park and recreation areas in the EIR analysis, and additional mitigation beyond project design is not required.

SI-4 Comments noted. There were no special status species or natural communities detected during project surveys that would require reporting to the California Natural Diversity Database.



## COMMENTS

## RESPONSES

Sara Osborn  
City of San Diego  
April 3, 2020  
Page 4 of 5

**FILING FEES**

S1-5

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

**CONCLUSION**

S1-6

CDFW appreciates the opportunity to comment on the DEIR to assist the City of San Diego in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, environmental scientist at (858) 636-3159 or [Jessie.Lane@wildlife.ca.gov](mailto:Jessie.Lane@wildlife.ca.gov), or Melissa Stepek at (858) 637-5510 or [Melissa.Stepek@wildlife.ca.gov](mailto:Melissa.Stepek@wildlife.ca.gov).

Sincerely,



David Mayer  
Environmental Program Manager

**Attachments**

A. Draft MMRP (CDFW 2020)

cc: Office of Planning and Research, State Clearinghouse, Sacramento

**REFERENCES**

California Department of Fish and Wildlife. 2018. Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Junipers Project, Project Number 586670; SCH# 2018041032

City of San Diego. March 1997. Multiple Species Conservation Program, City of San Diego Subarea Plan. City of San Diego Community and Economic Development Department.

City of San Diego. April 29, 2014. Black Mountain Open Space Park Natural Resource Management Plan. Prepared by City of San Diego Park and Recreation Department Open Space Division in conjunction with City Planning and Community Investment Department Multiple Species Conservation Program.

S1-5 Comment noted. The required fees will be paid upon filing the Notice of Determination.

S1-6 Comments noted. These comments do not address the adequacy or accuracy of the analyses in the Draft EIR and do not require additional response.



## COMMENTS

## RESPONSES

Sara Osborn  
City of San Diego  
April 3, 2020  
Page 5 of 5

Attachment A:

**CDFW Draft Mitigation, Monitoring, and Reporting Plan and Associated Recommendations**

Biological Resources			
	Mitigation Measures	Timing	Responsible Party
MM-BIO-1	In order to minimize potential for non-native plants to reach the MHPA, the City shall incorporate native plant species into all open space areas and landscapes throughout the Project.	During construction	City of San Diego
MM-BIO-2	In response to increased pressure on wildlife in Black Mountain Open Space Preserve due to construction of new housing developments in the Peñasquitos planning, the City Shall:  a. Avoid establishing any new trails  b. Decommission any existing illegal trails  c. Provide funding commensurate with proposed development density (e.g., per unit), toward achieving all of the Black Mountain Open Space Park Maintenance Projects	Prior to Construction	City of San Diego

S1-7

S1-7 As explained above in Response to Comments 2 and 3, no significant impacts were identified with respect to invasive species or the BMOS, and therefore no associated mitigation is required.



## COMMENTS

## RESPONSES

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
PHONE (619) 688-3137  
FAX (619) 688-4299  
TTY 711  
www.dot.ca.gov



Making Conservation  
a California Way of Life.

April 3, 2020

11-SD-15  
The Junipers DEIR  
SCH 2018041032

Ms. Sara Osborn  
City of San Diego  
1222 First Avenue MS 501  
San Diego, CA 92101

Dear Ms. Osborn:

S2-1

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Junipers development located near Interstate 15 (I-15). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Previous coordination with Caltrans has identified the required forms and appropriate engineering documents required to process an encroachment permit for The Junipers development project. Please clarify and incorporate the comments below:

S2-2

As described in the project description 2.2 and shown in Figure 15-1 of the February 2020 Traffic Study, please ensure that the proposed right-turn in only lane from Carmel Mountain Road onto the project site, meets all Caltrans standards and is included with the City's final conditions of approval for the Junipers development.

S2-3

**Traffic**

Please refer to Caltrans 2018 Standard Plan A87A and the 6th Edition Highway Design Manual, (HDM) Section 303.2 and Table 303.1 for the proposed raised median within Caltrans right of way. Please call out the proposed raised median curb type on the VTM sheet C4 cross section of Carmel Mountain Road.

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

- S2-1 Comment noted. This comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require response.
- S2-2 The right-turn lane would meet Caltrans design criteria in Caltrans jurisdiction. Within City jurisdiction, the lane would meet City design standards.
- S2-3 In accordance with the comment, the existing plan within Caltrans jurisdiction is for a raised median with a Type B-2 curb and gutter. The VTM will be revised to specify the curb type within the Caltrans right-of-way (ROW).



## COMMENTS

## RESPONSES

<p>Ms. Sara Osborn April 3, 2020 Page 2</p>	
<p>S2-4 A Permit Engineering Evaluation Report (PEER) should be prepared when new operating improvements are constructed by the permittee that become part of the State Highway System. These include but are not limited to, signalization, channelization, turn pockets, widening, realignment, public road connections, and bike paths and lanes. After approval of the PEER and any necessary supporting documents, an encroachment permit may be issued. Please find the attachment of the PEER application form.</p>	<p>S2-4 Comments noted. The applicant understands that a PEER is required and will be prepared as part of final design.</p>
<p>S2-5 The driveway and sidewalk along the proposed project need to comply with all ADA requirements. Please refer to:</p> <ul style="list-style-type: none"> <li>- The 6th Edition Highway Design Manual: September 22, 2014 Index 105.2 Sidewalks and Walkways and Index 105.4 Accessibility Requirements.</li> <li>- Caltrans 2018 Standard Plans A87A, Curbs and Driveway.</li> <li>- Design Information Bulletin (DIB) 82-06.</li> </ul>	<p>S2-5 The final design will comply with all appropriate accessibility standards.</p>
<p>S2-6 <b>Multimodal</b> Caltrans is agreeable to the proposed 6' bike lane with 2' buffer on Carmel Mountain Road to enhance the biking experiences as identified in the San Diego Association of Governments (SANDAG) Riding to 2050, the San Diego Regional Bike Plan, as well as the City of San Diego Bicycle Master Plan.</p>	<p>S2-6 Caltrans agreement with the proposed 6-foot bike lane with a 2-foot buffer on Carmel Mountain Road is noted.</p>
<p>S2-7 Please consider the signing/stripping items that are included in the PDF attached. Please note that the recommendations are conceptual, not to scale, and may need modifications as the developer works on the corresponding engineering plan sheets. Additionally, the complete streets improvements shown on the PDF attachment align with Caltrans, City of San Diego, and SANDAG best practices for bicycle and pedestrian improvements and should be implemented with this project.</p>	<p>S2-7 Comments noted. Consistent with the comment, the cited design elements are typical of bicycle and pedestrian treatments. The applicant will implement signing and striping associated with the right turn in only lane consistent with the appropriate Caltrans and City Standards.</p>
<p>S2-8 <b>Design</b> In reference to Sheet C4 Tentative Map (February 2020), a design standard decision document (DSD) will be needed for a sidewalk width that is less than 6 feet, which is the standard in the Highway Design Manual (HDM) 105.2.</p>	<p>S2-8 City staff recommends that a 6-foot wide sidewalk be implemented within the Caltrans ROW so that a design standard decision is not needed and will not delay implementation. This would be implemented where new sidewalk is being provided, as shown on TM Sheet C4.</p>
<p>S2-9 A proposed curb was called out as Type H, which in the Caltrans Standard Plans used for bridges, but is being used on the proposed roadway improvement. Please clarify.</p>	<p>S2-9 Comments noted. It is acknowledged that the Type H curb is used by Caltrans for bridge improvements. The City uses this type of curb for suburban improvements. The project specifies it for areas within both City and Caltrans jurisdiction on Carmel Mountain Road.</p>
<p><i>"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"</i></p>	

## COMMENTS

## RESPONSES

Ms. Sara Osborn  
April 3, 2020  
Page 3

S2-10

The proposed grading within the State Right of Way (R/W) does not comply with the Project Development Procedures Manual Chapter 17, Non-Utility Encroachments Within Access Control R/W. The project would need to demonstrate why grading features cannot remain within their own property. It is prohibited by the Encroachment Policy stated above, and if an exception is requested, the project team would need to document all other options and justify why grading into the right of way is the only viable solution. [NOTE: Headquarters Caltrans and Federal Highway Administration (FHWA) would be involved in considering an exception along an interstate freeway] Please clarify.

S2-11

**Right-of-Way**

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

Caltrans Permits Office Link  
<https://dot.ca.gov/programs/traffic-operations/ep>

If you have any questions, please contact Roger Sanchez-Rangel, of the Caltrans Development Review Branch, at (619) 688-6494 or by e-mail sent to [roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov).

Sincerely,

*Maurice Eaton*

Maurice Eaton, Branch Chief  
Local Development and Intergovernmental Review Branch

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

S2-10 Proposed grading within Caltrans jurisdiction, shown on the project Tentative Map (TM), has been through a review process with Caltrans. In a telephone call between the applicant and Mr. Trent Clark on April 29, 2019, it was confirmed that the TM design was approved and that no additional documents need to be submitted prior to final design. It is understood that an encroachment permit would be required, as part of the process, to enter Caltrans property and perform the work. Please also see Response to Comment 11, below.

S2-11 Comments noted. The requirement to provide a final environmental document is understood. The EIR (Section 3.0, *Project Description*) addresses the area within Caltrans ROW. The requirement for the encroachment permit was specifically identified in EIR Table 3-2, *Discretionary Actions Required*.



## COMMENTS

## RESPONSES

STATE OF CALIFORNIA • DEPARTMENT OF TRANSPORTATION  
**PERMIT ENGINEERING EVALUATION REPORT**  
TR-0112 (REV 6/2001)

PREPARATION HOURS	PERMIT NUMBER
DATE	DIST/COUNTY/PM
EA USED	APPLICANT

1. DESCRIBE PERMIT PROPOSAL, WHAT IT SERVES, APPROXIMATE COST.

2. DESCRIBE EXISTING HIGHWAY - BRIEF ANALYSIS OF IMPACT ON HIGHWAY OPERATION AND MAINTENANCE.

3. ANALYZE PERMIT PROPOSAL FOR GEOMETRIC AND FUNCTIONAL ADEQUACY.

4. NON-STANDARD DESIGN FEATURES ☐ YES ☐ NO  
REVISION IN ACCESS CONTROL INVOLVED. ☐ YES ☐ NOIf YES above, provide rationale and name &  
date of headquarters reviewer's occurrence.  
(and on Federal Aid Projects, FHWA concurrence on separate sheet)

IF YES, DATE OF HQ APPROVAL

5. SIGNALIZATION INVOLVED ☐ YES ☐ NO  
If yes, signal warrants met ☐ YES ☐ NO\* ☐ NOT APPLICABLE  
Capacity Analysis OK ☐ YES ☐ NO\* ☐ NOT APPLICABLE  
Safety Analysis OK ☐ YES ☐ NO\* ☐ NOT APPLICABLE  
Ownership/Maintenance Provisions OK ☐ YES ☐ NO\* ☐ NOT APPLICABLE

\* Comments, Supporting documents on attached sheet(s)

PERMIT PROPOSAL RECOMMENDED

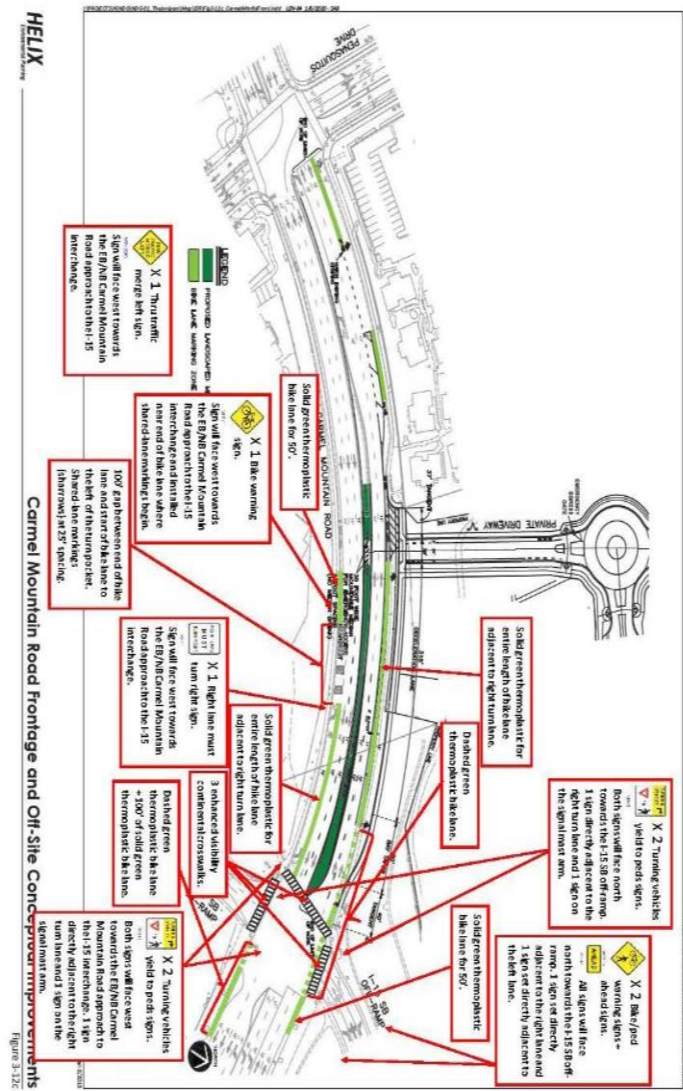
☐ Yes, as submitted ☐ Yes, with conditions described above ☐ No, as described above

PREPARED BY	TITLE	UNIT	DATE	SIGNATURE
APPROVED BY (Caltrans Engineer)	TITLE	UNIT	DATE	_____, Registered Civil Engineer

I attest to the technical information contained herein and  
have judged the qualifications of all technical specialists  
providing engineering data upon which recommendations,  
conclusions, and decisions were based.

REMARKS: SEND ONE COPY OF COMPLETED REPORT TO HEADQUARTERS DESIGN AND LOCAL PROGRAMS.

**ADA Notice** For individuals with sensory disabilities, this document is available in alternate formats. For alternate format information, contact the Forms Management Unit at (916) 445-1233, TTY 711, or write to Records and Forms Management, 1120 N Street, MS-89, Sacramento, CA 95814.





## COMMENTS

## RESPONSES

State of California – Transportation Agency

GAVIN NEWSOM, Governor

## DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

San Diego Area  
 5902 Kearny Villa Road  
 San Diego, CA 92123  
 (858) 293-6000  
 (800) 735-2929 (TT/TDD)  
 (800) 735-2922 (Voice)



March 30, 2020

File No.: 645.13962.15606

State Clearinghouse  
 1400 Tenth Street, Room 121  
 Sacramento, CA 95814

Subject: SCH# 2018041032

The San Diego Area of the California Highway Patrol recently received the referenced 'Notice of Completion' environmental impact document from the State Clearinghouse (SCH).

S3-1

Our concern relates to the proposed construction of more than 536 residential units west of Interstate 15, north of Carmel Mountain Road. At this location, Interstate 15 serves as a major artery between north San Diego County residents and the city of San Diego. Based on the increased number of vehicles associated with the proposed residential unit construction, this project could have a negative impact on our operations due to increased traffic congestion and collisions within our jurisdiction.

If you have any questions regarding these concerns, please contact Lieutenant Noel Coady at (858) 293-6000.

Sincerely,

T. COOPER, Captain  
 Commander

Enclosure

Safety, Service, and Security



An Internationally Accredited Agency

S3-1 Comments noted. Potential project effects focused on relevant roadways are documented in EIR Section 5.2, *Transportation/Circulation*, and the project Transportation Impact Analysis (Appendix B to the EIR). As documented, Interstate 15 (I-15) roadway segments would not change in Level of Service (LOS) with implementation of the project – or with the project as well as known cumulative projects (see Tables 5.2-6, 5.2-8, and 5.2-10). There is also no considerable or significant contribution to cumulative volumes at on-ramp intersections to I-15 (see intersections 2 and 3 for northbound and southbound on-ramps from Carmel Mountain Road to I-15, and intersections 10 and 11 for Rancho Peñasquitos Boulevard/Carmel Mountain Road westbound and eastbound ramps onto I-15, respectively). As shown on EIR Tables 5.2-5, 5.2-7, and 5.2-9, there would be no change in intersection LOS from existing conditions, with the addition of project traffic. The project would add up to 0.3 second of delay to these intersections, which is not a significant impact.

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2018041032

Project Title: THE JUNIPERS (PTS No. 586670)

Lead Agency: City of San Diego

Contact Person: Sara Osborn

Mailing Address: 1222 First Avenue, MS 501

Phone: (619) 446-5381; sosborn@sandiego.gov

City: San Diego, CA

Zip: 92101

County: San Diego

Project Location: County: San Diego

City/Nearest Community: San Diego (Rancho Penasquitos)

Cross Streets: Carmel Mountain Rd. and Penasquitos Dr. (14455 Penasquitos Dr.)

Zip Code: 92129

Lat. / Long.: 32 deg. 58' 45" N / 117 deg. 05' 29" W

Total Acres: 112.3

Assessor's Parcel No.: 313-011-06, 07, &amp; 10, 313-060-10

Section:

Twp.:

Range:

Base:

Within 2 Miles: State Hwy #: I-15, SR-56

Waterways:

Airports:

Railways:

Schools: Mt. Carmel High School

**Document Type:**

CEQA:

☐ NOP☐ Early Cons☐ Neg Dec☐ Mit Neg Dec☒ Draft EIR☐ Supplement/Subsequent EIR

(Prior SCH No.)

Other

NEPA:

☐ NOI☐ EA☐ Draft EIS☐ FONSI

Other:

☐ Joint Document☐ Final Document☐ Other**Local Action Type:**☐ General Plan Update☐ General Plan Amendment☐ General Plan Element☒ Community Plan Amend.☐ Specific Plan☐ Master Plan☐ Planned Unit Development☐ Site Plan☒ Rezone☐ Prezone☐ Use Permit☒ Land Division (Subdivision, etc.)☐ Annexation☐ Redevelopment☐ Coastal Permit☒ Other: Site Development Permit**Development Type:**☒ Residential: Units 536

Acres 112.3

☐ Office: Sq.ft.

Acres

Employees

☐ Commercial: Sq.ft.

Acres

Employees

☐ Industrial: Sq.ft.

Acres

Employees

☐ Educational☐ Recreational☐ Water Facilities: Type

MGD

☐ Gas: Type

Mineral

Power: Type

MW

☐ Waste Treatment: Type

MGD

☐ Hazardous Waste: Type

STATE CLEARINGHOUSE

**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Fiscal☐ Recreation/Parks☐ Vegetation☐ Agricultural Land☐ Flood Plain/Flooding☐ Schools/Universities☒ Water Quality☒ Air Quality☒ Forest Land/Fire Hazard☐ Septic Systems☒ Water Supply/Groundwater☒ Archaeological/Historical☒ Geologic/Seismic☐ Sewer Capacity☒ Wetland/Riparian☒ Biological Resources☒ Minerals☒ Soil Erosion/Compaction/Grading☐ Wildlife☐ Coastal Zone☒ Noise☐ Solid Waste☐ Growth Inducing☒ Drainage/Absorption☐ Population/Housing Balance☐ Toxic/Hazardous☒ Land Use☐ Economic/Other☒ Public Services/Facilities☒ Traffic/Circulation☒ Cumulative Effects☒ Other: Energy, Greenhouse Gases, Health & Safety, Public Utilities, Alternatives**Present Land Use/Zoning/General Plan Designation:**

Present Zoning: RS-1-14 (Residential-Single Unit). Proposed Zoning: RM-1-1, RM-3-7, (Residential-Multi Unit) and OR-1-1, OP-1-1 (Open Space)

Present Community Plan Designation: Open Space. Proposed Community Plan Designation: Residential - Low (5-9 DU/AC)

**Project Description:** The project includes a Site Development Permit, Planned Development Permit, General Plan Amendment, Community Plan Amendment, CIPOZ, Rezone, Vesting Tentative Map, Sewer Easement Vacation and Variance from the Inclusionary Housing Regulations to develop 536 residential units on a vacant 112.3-acre property adjacent to 14455 Rancho Penasquitos Boulevard. The project entails the development of a vacant property (non-operational golf course) to create a residential subdivision with 455 multi-family attached and

S4-1 The comment consists of the Notice of Completion files with the state Clearinghouse, as well as the CEQAnet documentation. Together, they note dates of public circulation, describe the project, and state agencies to which the City independently sent project notices of availability, or requested the state to do so. They also identify the three state agencies that submitted comment letters in response (California Department of Fish and Wildlife, California Department of Transportation, and California Highway Patrol). Those letters, together with any attachments submitted by the commenting agencies, and specific responses to them, are provided above (reference letters S1, S2 and S3, respectively).

S4-1



S4-1  
cont.

detached residences for those aged 55 and above, a three-story building with 81 senior affordable multi-family apartments, a 2.87-acre (net) public park, privately owned/publicly accessible 2.75-mile "Social Loop" trail, 0.52-acre privately-owned/publicly accessible park with mobility amenities, other private open space/parks and recreational amenities for project residents' use, and internal streets. Retaining walls around the site perimeter would vary from 3 to 12 feet high. The residential privacy fencing along the eastern edge of the property will be designed to also protect project uses from I-15 noise. The project would be fully landscaped and would incorporate a variety of sustainable design features. Utilities to serve the project are available in the immediate vicinity.

Vehicular access to the project site would be provided from Peñasquitos Drive at the existing intersection with Janal Way, and from a new right-in only access road off of Carmel Mountain Road (including provision of a new deceleration lane for right-turning traffic and an emergency-only egress right-out lane from the project site onto Carmel Mountain Road). The project would provide a roundabout at Janal Way/Peñasquitos Drive/Project Access and a traffic signal at Cuca Street/Peñasquitos Drive/Hotel Karlan Driveway. The project also would improve and retain an existing fire/emergency access/egress connection from Del Diablo Street to the northwestern portion of the project site, as well as an existing off-site emergency access/egress between Andorra Way and Corte Raposo. As part of the project approval, a General Plan Amendment is needed to change the designated land use from "Open Space" to "Residential" and an amendment to the Rancho Peñasquitos Community Plan is needed to change the on site designated land uses to a combination of Low-Medium Density Residential (i.e., 5 to 10 dwelling units per developable acre), open space, and parks, including both neighborhood and commercial parks. The project also proposes a zoning change from residential and commercial zones RS-1-14 and CV-1-1 to residential and open space zones RM-1-1, RM-3-7, OR-1-1, and OP-1-1. A Community Plan Implementation Overlay Zone would be placed over the residentially zoned portions of the site to require discretionary review of site development proposals. Permits will be required from the Army Corps of Engineers and the Regional Water Quality Control Board to impact and reestablish an unvegetated ditch that runs through the eastern portion of the site.

#### Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X". If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Emergency Services
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> CalFire	<input type="checkbox"/> Parks & Recreation
<input checked="" type="checkbox"/> S Caltrans District # 11	<input type="checkbox"/> Pesticide Regulation, Department of
<input type="checkbox"/> Caltrans Division of Aeronautics	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Planning (Headquarters)	<input checked="" type="checkbox"/> S Regional WQCB # 9
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Coachella Valley Mountains Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Commission
<input type="checkbox"/> Coastal Commission, San Diego District	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers and Mtns Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mountains Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> S Fish & Wildlife Region: 5	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> General Services, Department of	<input checked="" type="checkbox"/> X Water Resources, Department of

## COMMENTS

## RESPONSES

S4-1  
cont.

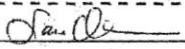
\_\_\_\_\_ Health Services, Department of  
\_\_\_\_\_ Housing & Community Development \_\_\_\_\_ Other \_\_\_\_\_  
\_\_\_\_\_ Integrated Waste Management Board \_\_\_\_\_ Other \_\_\_\_\_  
\_\_\_\_\_ Native American Heritage Commission

-----  
**Local Public Review Period (to be filled in by lead agency)**

Starting Date February 19, 2020 Ending Date April 6, 2020  
-----

**Lead Agency (Complete if applicable):**

Consulting Firm: \_\_\_\_\_ Applicant: \_\_\_\_\_  
Address: \_\_\_\_\_ Address: \_\_\_\_\_  
City/State/Zip: \_\_\_\_\_ City/State/Zip: \_\_\_\_\_  
Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_  
-----

Signature of Lead Agency Representative:  Date: 2/18/2020

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



S4-1  
cont.

10/22/2020

THE JUNIPERS (PTS No. 586670)

THE JUNIPERS (PTS No. 586670)

Summary

SCH Number

2018041032

Lead Agency

San Diego, City of (*City of San Diego*)

Document Title

THE JUNIPERS (PTS No. 586670)

Document Type

EIR - Draft EIR

Received

2/19/2020

Project Applicant

City of San Diego

Present Land Use

Present Zoning: RS-1-14 (Residential-Single Unit). Proposed Zoning: RM-1-1, RM-3-7, (Residential-Multi Unit) and OR-1-1, OP-1-1 (Open Space) Present Community Plan Designation: Open Space. Proposed Community Plan Designation: Residential - Low (5-9 DU/AC)

Document Description

The project includes a Site Development Permit, Planned Development Permit, General Plan Amendment, Community Plan Amendment, CIPOZ, Rezone, Vesting Tentative Map, Sewer Easement Vacation and Variance from the Inclusionary Housing Regulations to develop 536 residential units on a vacant 112.3-acre property adjacent to 14455 Rancho Penasquitos Boulevard. The project entails the development of a vacant property (non-operational golf course) to create a residential subdivision with 455 multi-family attached and detached residences for those aged 55 and above, a three-story building with 81 senior affordable multi-family apartments, a 2.87-acre (net) public park, privately owned/publicly accessible 2.75-mile "Social Loop" trail, 0.52-acre privately owned/publicly accessible park with mobility amenities, other private open space/parks and recreational amenities for project residents' use, and internal streets. Retaining walls around the site perimeter would vary from 3 to 12 feet high. The residential privacy fencing along the eastern edge of the property will be designed to also protect project uses from 1-15 noise. The project would be fully landscaped and would incorporate a variety of sustainable design features. Utilities to serve the project are available in the immediate vicinity. Vehicular access to the project site would be provided from Penasquitos Drive at the existing intersection with Janal Way, and from a new right-in only access road off of Carmel Mountain Road (including provision of a new deceleration lane for right-turning traffic and an emergency-only egress right-out lane from the project site onto Carmel Mountain Road). The project would provide a roundabout at Janal Way/Penasquitos Drive/Project Access and a traffic signal at Cuca Street/Penasquitos Drive/Hotel Karlan Driveway. The project also would improve and retain an existing fire/emergency access/egress connection from Del Diablo Street to the northwestern portion of the project site, as well as an existing off-site emergency access/egress between Andorra Way and Corte Raposo. As part of the project approval, a General Plan Amendment is needed to change the designated land use from "Open Space" to "Residential" and an amendment to the Rancho Penasquitos Community Plan is needed to change the on site designated land uses to a combination of Low-Medium Density Residential (i.e., 5 to 10 dwelling units per developable acre), open space, and parks, including both neighborhood and commercial parks. The project also proposes a zoning change from residential and commercial zones RS-1-14 and CV-1-1 to residential and open space zones RM-1-1, RM-3-7, OR-1-1, and OP-1-1. A Community Plan Implementation Overlay Zone would be placed over the residentially zoned portions of the site to require discretionary review of site development proposals. Permits will be required from the Army Corps of Engineers and the Regional Water Quality Control Board to impact and reestablish an unvegetated ditch that runs through the eastern portion of the site.

Contact Information

Sara Osborn  
City of San Diego

<https://eqlnet.spr.ca.gov/2018041032>

1/3

## COMMENTS

## RESPONSES

S4-1  
cont.

10/22/2020

THE JUNIPERS (PTS No. 586670)

1222 First Avenue, MS 501  
San Diego, CA 92101  
Phone : (619) 446-0381  
sosborn@sandiego.gov

## Location

**Coordinates** 32°58'45"N 117°5'29"W

**Cities** San Diego

**Counties** San Diego

**Cross Streets** Carmel Mountain Rd. and Penasquitos Dr. (14455 Penasquitos Dr.)

**Zip** 92129

**Total Acres** 112.3

**Parcel #** 313-011-06, 07, & 10, 313-060-10

**Railways** I-15, SR-56

**Schools** Mt. Carmel High School

## Notice of Completion

**Review Period Start** 2/19/2020

**Review Period End** 4/3/2020

**Development Type** Residential (536 Units, 112.3 Acres)

**Local Action** Community Plan Rezone Subdivision Site Dev Permit

**Project Issues** Aesthetic/Visual Air Quality Archaeologic/Historic Biological Resources Drainage/Absorption Geologic/Seismic Greenhouse Gas Emissions Noise Public Services Soil Erosion/Compaction/Grading Traffic/Circulation Water Quality Water Supply Wetland/Riparian Land Use Cumulative Effects Other Energy, Health & Safety, Public Utilities, Alternatives

**Reviewing Agencies** California Air Resources Board California Department of Conservation California Department of Forestry and Fire Protection California Department of Housing and Community Development California Department of Parks and Recreation California Department of Water Resources California Governor's Office of Emergency Services California Native American Heritage Commission California Natural Resources Agency California Regional Water Quality Control Board, San Diego Region 9 California San Diego River Conservancy Department of Toxic Substances Control Office of Historic Preservation State Water Resources Control Board, Division of Drinking Water California Department of Transportation, District 11 California Department of Fish and Wildlife, South Coast Region 3 California Highway Patrol

## Attachments

**Environmental Document**

1. Public Notice The Junipers Draft EIR PDF 143 K

2. Certification Page The Junipers Draft EIR PDF 152 K 2018041032 NOA PDF 809 K

3. The Junipers Project EIR No. 586670 PDF 392359 K

Appendix A, Notice of Preparation, Response Letters, Scoping Meeting Sign-in Sheet, Scoping Meeting Transcript PDF 39334 K

Appendix B, Transportation Impact Analysis and Trigger Analysis Memo PDF 21462 K

Appendix C, Acoustical Analysis Report PDF 13009 K

Appendix D, Air Quality Technical Report PDF 6676 K

Appendix E, Greenhouse Gas Emissions Technical Report (Including CAP Checklist) PDF 5994 K

Appendix F, Biological Resources Letter Report PDF 17873 K

<https://oceanet.cpr.ca.gov/2018041032/>

35



## COMMENTS

## RESPONSES

S4-1  
cont.

10/23/2020

THE JUNIPERS (PTS No. 586670)

Appendix G1, Drainage Study	PDF	74822 K
Appendix G2, Storm Water Quality Management Plan	PDF	92886 K
Appendix H, Geotechnical Investigation	PDF	43992 K
Appendix I1, Archaeological Resources Report Form (excludes Confidential Appendices)	PDF	8554 K
Appendix I2, Former Carmel Highlands Golf Course Built Environment Assessment	PDF	940 K
Appendix I3, AB 52 Documentation	PDF	1530 K
Appendix J1, Water Supply Assessment	PDF	935 K
Appendix J2, Private Water System Analysis	PDF	4816 K
Appendix J3, Sewer System Analysis	PDF	54443 K
Appendix J4, Waste Management Plan	PDF	6582 K
Appendix K1, Phase I Environmental Site Assessment, Carmel Highland Golf Course	PDF	298960 K
Appendix K2, Phase I Environmental Site Assessment, Vacant Land, Unassigned Address	PDF	128114 K
Appendix K3, Asbestos and Lead-Based Paint Investigation	PDF	1081 K
Appendix K4, Wildland Fire Evacuation Plan	PDF	40893 K
Appendix K5, Fire Protection Plan	PDF	13309 K
Appendix L, Paleontological Records Search	PDF	1316 K
Summary Form	PDF	128 K
<b>NOC</b>		
NOC	PDF	1250 K
<b>State Comments</b>		
2018041032_Caltrans Comment	PDF	220 K
2018041032_CDFW Comment	PDF	158 K
2018041032_CHP Comment	PDF	798 K

**Disclaimer:** The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) or via phone at (916) 445-0613. For more information, please visit OPR's Accessibility Site.



## County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH  
**VECTOR CONTROL PROGRAM**  
 5570 OVERLAND AVENUE, SUITE 102, SAN DIEGO, CA 92123  
 Phone: (619) 694-2888 Fax: (619) 571-4268  
[www.SDVector.com](http://www.SDVector.com)

**AMY HARBERT**  
 ASSISTANT DIRECTOR

April 2, 2020

Ms. Sara Osborn  
 City of San Diego Development Services Center  
 1222 First Avenue, MS 501  
 San Diego, CA 92101

Via e-mail to: DSDEAS@sandiego.gov

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE JUNIPERS,  
 PROJECT NO. 586670

Dear Ms. Osborn:

Thank you for the opportunity to comment on the draft Environmental Impact Report for the above referenced project. The County of San Diego Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has completed their review and has the following comments regarding the proposed project.

R1-1

1. The VCP respectfully requests that the project design features address potential impacts from possible mosquito breeding sources created by the project and that the project is constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading activities, vehicle tires, ditches, and landscaping do not result in depressions that will hold standing water. In addition, ensure drainage areas and other structures do not create a potential mosquito breeding source. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.

R1-2

2. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.

R1-3

3. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at [http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector\\_guidelines.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf) and the

"Environmental and public health through leadership, partnership and science"

R1-1 Construction-related depressions, created by grading activities, vehicle tires, ditches and landscaping, would not result in depressions that would hold water. In addition, the project design features would ensure that drainage areas (capable of capturing and holding water of more than 0.5 inch for more than 96 hours) and other structures do not create a potential mosquito breeding source. The project would implement Construction BMPs through condition of permit and would be consistent with the California Stormwater Quality Association Stormwater Best Management Practices Handbook, to ensure that drainage occurs within 72 hours/there is no standing water in drainage areas between storms. This would prevent creation of mosquito habitat and minimize opportunity for breeding.

R1-2 The VCP's authority to control vectors during the project construction and operation is noted..



## COMMENTS

## RESPONSES

R1-3  
cont.

Ms. Osborn  
April 2, 2020  
City of San Diego

California Department of Public Health Best Management Practices for Mosquito Control in California is available at  
<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/MosquitoesandMosquitoBorneDiseases.aspx#>

The VCP appreciates the opportunity to participate in the environmental review process for this project. If you have any questions regarding these comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at [Daniel.Valdez@sdcounty.ca.gov](mailto:Daniel.Valdez@sdcounty.ca.gov).

Sincerely,



MICHELLE PRICE, Program Coordinator  
Vector Control Program

Email cc:

Vincent Kattoula, CAO Staff Officer, LUEG

R1-3 County Guidelines for Determining Significance for Vectors are noted.

## COMMENTS

## RESPONSES

**From:** [Hentrich, Katie](#)  
**To:** [DSD FAS](#)  
**Cc:** [Litchney, Seth](#); [Ferchaw, Tracy](#)  
**Subject:** [EXTERNAL] The Junipers (Project No. 586670) Draft EIR - SANDAG Comments  
**Date:** Thursday, April 02, 2020 4:34:43 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

Ms. Osborn,

Thank you for the opportunity to comment on the City of San Diego's The Junipers (Project No. 586670) Draft EIR. SANDAG is submitting the following comments, below:

R2-1

- It is suggested that a transportation analysis be undertaken to understand the impacts of the project on multimodal transportation, including impacts to walking and biking. Impact mitigation should include consideration of how to provide safe and comfortable bicycling and walking connections to surrounding destinations, such as Rolling Hills Elementary and Park, Carmel Mountain Plaza, and others. These could include buffered or protected bikeways, intersection crossing improvements, and other safety and comfort improvements.

R2-2

- It is suggested that special attention be paid to pedestrian crossings, with considerations included for bulb-outs at intersections and other traffic calming features. It will be important to create a safe and comfortable walking environment to encourage nonmotorized travel within the project site.

Please let Seth Litchney ([seth.litchney@sandag.org](mailto:seth.litchney@sandag.org)) and Tracy Ferchaw ([tracy.ferchaw@sandag.org](mailto:tracy.ferchaw@sandag.org)) know if you have any questions.

Thank you very much,

Katie Hentrich  
 Associate Regional Energy/Climate Planner

(619) 595-5609  
 401 B Street, Suite 800, San Diego, CA 92101



**SANDAG** hours: Tuesday-Friday and every other Monday from 8 a.m.-5 p.m.  
 Employees are teleworking while our offices are closed during the COVID-19 pandemic.

R2-1

For clarification, the project would not result in adverse impacts to multi-modal transportation; see EIR Section 5.2.4, *Alternative Transportation*, which determined no significant impacts would occur and no mitigation measures would be required. Text below includes additional information on the multimodal transportation components of the project and how the traffic mitigation measures TRA-1 and TRA-2 accommodate multimodal transportation.

The beneficial on-site social loop trail, sidewalks and bike lanes are designed to connect to existing off-site sidewalks and crosswalks (see EIR Figure 3-9a). This includes connections to existing sidewalks along Peñasquitos Drive, Del Diablo Way, Del Diablo Street and Carmel Mountain Road, that lead to Rolling Hills Elementary School ball fields and through the residential neighborhood.

As shown on EIR Figure 3-9b, existing Class II (striped) bike lanes are located along Peñasquitos Drive (marked up to and fronting the school to the intersection with Alamazon Street north of the school) and along Carmel Mountain Road.



## COMMENTS

## RESPONSES

	<p>R2-1 (cont.) Similarly, they are located along Carmel Mountain Road as it trends easterly, across I-15 to meet the Class II facilities along Rancho Carmel Drive and provide bike lane access to both sides of Carmel Mountain Plaza. Access to the north side of Peñasquitos Drive (west-bound street) would be facilitated by the roundabout proposed at Janal Way (Mitigation Measure TRA-2), which would improve crossing conditions for pedestrians and cyclists as they enter or cross Peñasquitos Drive as it would provide traffic calming along Peñasquitos Drive at Janal Way, which is currently controlled by stop signage on Janal only . The proposed roundabout would improve entry and crossing potential for non-vehicular users. Crossings at Carmel Mountain Road are already signalized at Peñasquitos Drive, and another signal would be installed by the project at Peñasquitos Drive and Cuca Street (Mitigation Measure TRA-1), which provide protected crossings for pedestrians and cyclists due to stopping of vehicular traffic.</p> <p>In addition, the project incorporates a mobility zone and bicycle hub within the southeastern corner of the project site, to promote bicycling, transit, ridesharing and other options. The mobility zone is proposed to include a drop-off/pickup area for rideshare, carpool and similar purposes; signage regarding transit options and schedule; and shaded seating areas. The bicycle hub is proposed to include bicycle racks (14 spaces), pneumatic air pressure facilities, bike stands with tethered repair tools, outdoor day use lockers and two bike vending kiosks, a staging area for shared scooters and ebikes with posted user information, and posted information regarding local and regional streets and trails showing bike routes. A shade structure also would be provided to create an environment conducive to waiting for on-demand service (see EIR Figure 3-8).</p>
--	--

## COMMENTS

## RESPONSES

	<p>R2-1 (cont.) The project is anticipated to improve pedestrian and biking use within the community. EIR Section 5.2.4 analyzed Alternative Transportation and determined that no significant impacts would occur and no mitigation measures would be required.</p> <p>R2-2 Comments noted. The streets incorporate a pedestrian access network that internally links all uses and connects to existing external streets and pedestrian facilities contiguous with the project site. This, together with the roundabouts added as traffic calming measures along Private Driveways A and B (see Figure 3-12a, <i>Project Internal Street Layout and Connections to Off-Site Roads</i>), and vegetation along the walkways consistent with Mobility Element Table ME-1 would encourage pedestrian activity. The primary access driveways A, B and C would have medians to facilitate pedestrian crossings at intersections. Class II bike lanes would be incorporated along Private Driveways A, V, and portions of B, C and O, to allow for separated lane bicycle travel on portions of the site that would be more heavily traveled.</p>
--	---



**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

2 March 2020

To: Ms Sara Osborn  
Development Services Department  
City of San Diego  
1222 First Avenue, Mail Station 501  
San Diego, California 92101

Subject: Draft Environmental Impact Report  
The Junipers  
Project No. 586670

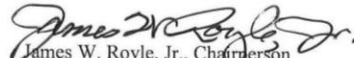
Dear Ms. Osborn:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in The DSEIR and its Appendices I1, I2 and I3, we agree with the impact analysis and the monitoring program as proposed.

Thank you for affording SDCAS this opportunity to participate in the public review period for this DEIR.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: Helix Environmental  
SDCAS President  
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

R3-1 The San Diego County Archaeological Society concurrence with impact analysis conclusions and the proposed monitoring program in the project's EIR and supporting technical studies in Appendices I1, I2 and I3 is noted. No additional response is required.



April 6, 2020

VIA E-MAIL

Sara Osborn  
City of San Diego Development Services  
1222 First Ave., MS 501  
San Diego, CA 92101

Re: The Junipers Draft EIR, Project No. 586670/SCH No. 2018041032

Dear City of San Diego:

This letter is submitted on behalf of PQ-NE Action Group in connection with the proposed Junipers Project ("Project") and related Draft Environmental Impact Report ("EIR").

I. Introduction

The California Environmental Quality Act ("CEQA"), Pub. Res. Code §§ 21000 – 21177, must be interpreted "so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency's decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. An EIR is "aptly described as the 'heart of CEQA'"; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

"An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences." CEQA Guidelines § 15151. A sufficient EIR demonstrates "adequacy, completeness and a good-faith effort at full disclosure." *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1355 (quoting *Rio Vista Farm Bureau Center v. City of Solano* (1992) 5 Cal.App.4th 351, 368).

Office: (760) 741-1200  
www.delanoanddelano.com  
104 W. Grand Avenue, Suite A • Escondido, CA 92025

EVERETT L. DELANO III  
Admitted in California and Colorado

M. DARE DELANO  
Admitted in California and New York

TYLER T. HEE  
Admitted in California and Hawaii

SI1-1

SI1-1 The comment provides general guidance regarding CEQA. The comment does not address the adequacy or accuracy of the Draft EIR; no further response is required.



## COMMENTS

## RESPONSES

City of San Diego  
April 6, 2020  
Page 2 of 5

II. The DEIR's Discussion of Project Impacts is Deficient

The EIR fails to adequately analyze traffic impacts.

- SI1-2 [
- The EIR assumes the Project's units would only generate four vehicle trips per day. EIR at 5.2-11. But there is inadequate support for this assumption, particularly since many people at 55 years and older are continuing to work.
- SI1-3 [
- The EIR does not discuss the impacts associated with the traffic from several projects using the Carmel Mountain Road/Peñasquitos Drive intersection.
- SI1-4 [
- The EIR does not address impacts to the I-15 freeway and interchanges.
- SI1-5 [
- The EIR does not account for the cumulative impacts from large-scale projects near the Project site. For example, there is no discussion of the proposed Millennium PQ project, which is a large project proposed for the site immediately adjacent to the Project site. *See* EIR Figure 6-1.

The EIR fails to adequately analyze land use, aesthetic, and community character impacts.

- SI1-6 [
- "Aesthetic issues 'are properly studied in an EIR to assess the impacts of a project.'" *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 937. The EIR does not provide any depictions of the Project from nearby viewpoints. All of the simulations are from a greater distance than what the immediate neighborhood will experience.
- SI1-7 [
- The Rancho Peñasquitos Community Plan ("Community Plan") designates most of the Project site as Open Space. The Project would change this designation. Yet the Community Plan specifically notes the importance of maintaining open space in the community. Community Plan at 10. And regarding the Project site, the Community Plan expresses the need "to preserve the golf course as a unifying open space element and buffer from the freeway ...." *Id.* at 39.
- SI1-8 [
- The EIR acknowledges the Project would conflict with existing requirements, but fails to discuss the impacts of the variances and deviations requested by the Project applicant.

The EIR fails to adequately analyze noise impacts.

- SI1-9 [
- The EIR inappropriately averages construction noise over a twelve-hour period. DEIR at 5.4-5. But the temporary nature of a noise impact does not make it insignificant. *See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1380 – 81. And it would be no more appropriate to use the lack of a standard as a basis to ignore significant effects than it would be to apply "a threshold of significance or regulatory standard 'in a way that forecloses the consideration of any other substantial evidence showing there may be a significant effect.'" *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 342 (quoting *Communities*

SI1-2 **Topical Response – Trip Rate Methodology.** As stated in EIR Section 5.2.2.2, *Impact Analysis*, under the heading "Methodology," and Transportation Impact Analysis Section 7.1, *Trip Generation*, the trip rate used is based on the City's 2003 Trip Generation Manual for "Retirement/Senior Citizen Housing." Please note that the trip rates for different uses shown on these tables are averages for the use type. In other words, whereas one resident may stay at home for an entire day, another may make more than four trips on that same day. These thresholds and standards are used consistently in City technical analyses. Residents of age-qualified housing include both retirees who would tend to avoid unnecessary peak hour trips and travel to a variety of local and regional destinations, and those still in the workforce whose travel patterns reflect that of a more typical commuter. The trip distribution used was not altered from a standard residential trip distribution, which assumes a large portion of residential trips are work related, and therefore oriented toward the nearest freeway.

This provides adequate support for the EIR analysis.

SI1-3 EIR Tables 5.2-7, 5.2-9, 5.2-12 and 5.2-13 specifically address impacts for this intersection including the proposed project, as well as Pacific Village, Merge 56, and the Preserve at Torrey Highlands in the Near-term as well as Horizon Year (2050) conditions, prior to and post mitigation.

	<p>SI1-4 <b>Topical Response – Freeway Mainline and On-ramp Thresholds.</b> As explained in EIR Section 5.2.1.1, per City standards, a freeway analysis is typically required if a project contributes over 150 peak hour trips to the freeway. A more conservative trigger of 50 peak hour trips was used for this project (consistent with regionally adopted San Diego Traffic Engineer’s Council [SANTEC] ITE guidelines). Also per SANTEC/ITE guidelines, the threshold to conduct ramp meter analysis is 20 peak hour trips contributed to any ramp meter. Figure 5.2-2b of the EIR shows that project-related peak hour trips entering the freeway would be below each of these thresholds (i.e., are below the threshold of 50 peak-hour trips, and the project would add less than 20 peak hour trips to any metered freeway ramps).</p> <p>Relative to the interchanges with I-15, the on-ramps are metered. The meters release traffic onto the state facilities based on mainline loading, with access intervals increased or decreased based on levels of main-line congestion. As shown on EIR Table 5.2-1, intersections 2 and 3, addressing the Carmel Mountain Road and I-15 north- and southbound ramps, respectively, as well as intersections 10 and 11, addressing Rancho Peñasquitos Boulevard and SR-56 west- and eastbound ramps, respectively, currently operate at acceptable levels of service providing access to or exit from these facilities with one exception. Intersection 11, the eastbound SR-56 on-ramp, currently operates at Level of Service (LOS) E during the PM peak hour. These same LOS values continue with the addition of the project under existing plus project conditions, with the project adding less than two seconds of delay (see Table 5.2-3, <i>Traffic Impact Significance Thresholds</i>).</p>
--	--



## COMMENTS

## RESPONSES

	<p>SI1-4 (cont.) As shown on EIR Table 5.2-7, the Opening Day (2020) Plus Project (Near-term) condition would remain at acceptable LOS C or D for Carmel Mountain Road/I-15 Northbound Ramps (intersection 2), Carmel Mountain Road /I-15 Southbound Ramps (intersection 3) and Rancho Peñasquitos Boulevard/ Carmel Mountain Road/SR-56 Westbound Ramps (intersection 10) as well as Rancho Peñasquitos Boulevard/Carmel Mountain Road/SR-56 Eastbound Ramps (intersection 11) in the AM peak hour. For intersection 11 in the PM peak hour, LOS would remain at E, but the increase in delay would be only 0.5 second. Under Horizon Year (2050) Plus Project conditions, as shown on EIR Table 5.2-9, conditions would remain at acceptable LOS C or D for intersections 2 and 3, and for intersection 10 in the PM peak hour. Intersection 10 would be LOS E in the AM peak hour, but there would be a 0.0 second increase in delay due to the project. At intersection 11, LOS E and F would occur in the AM and PM peak hours, respectively, under both with and without project conditions. The increases in delay would be 0.2 and 0.8 second, respectively, which would be under both the thresholds for significant impacts (i.e., increases of 2.0 seconds for LOS E threshold and 1.0 second for LOS F threshold) as shown in Table 5.2-3. Therefore, the project would not result in significant adverse impact to this on-ramp. This information is provided in the EIR and provides adequate support for the EIR analysis.</p> <p>SI1-5 <b>Topical Response – Cumulative Projects Addressed in the EIR.</b> The EIR addresses potential cumulative impacts. In addition to impacts associated with the proposed project as addressed in EIR Section 5.0, <i>Environmental Analysis</i>, EIR Section 6.0, <i>Cumulative Impacts</i>, specifically evaluated cumulative effects. This included analysis of the effects of the proposed project in combination with potential effects of other reasonably foreseeable projects known to the City as of April 10, 2018, when the Notice of Preparation (NOP) of the project EIR was issued. The date of issuance of the NOP establishes the CEQA</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI1-5 (cont.) baseline for project analyses in the EIR, per CEQA Guidelines Section 15125, and per standard City practice. As stated in CEQA Guidelines Section 15125:</p> <p><i>An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant...Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published.</i></p> <p>At the time of the NOP, three projects were identified as having the potential to contribute to cumulative impacts, and were evaluated in the EIR. These include Pacific Villages, for which a CEQA Mitigated Negative Declaration had been completed, along with Merge 56 and The Preserve at Torrey Highlands, each of which had active development applications at the City at the time of issuance of the NOP for the proposed project. The application for the Millennium PQ project on the Hotel Karlan site was deemed complete on June 14, 2019, and the application for the Carmel Mountain Ranch Golf Course redevelopment (Trails at Carmel Mountain Ranch) was deemed complete on January 31, 2020. Both applications postdate the proposed project NOP. It is therefore not required for the project EIR to address these projects as a part of the environmental baseline for cumulative analysis purposes.</p> <p>SI1-6 Aesthetic issues are discussed in EIR Section 5.3, <i>Visual Effects/Neighborhood Character</i>. Typical public views to the project site (Figures 5.3-2a-e), project vicinity photos of Del Diablo Street and Caminito Orense Este (Figure 5.3-3) and photo-simulations towards the project from Carmel Mountain Road and I-15 (Figures 5.3-4a-d), all together, provide a wide range of perspectives from various publicly accessible locations</p>
--	---



## COMMENTS

## RESPONSES

	<p>SI1-6 (cont.) around the site, the I-15 freeway and the Black Mountain Open Space Park. The photo-simulations depict the proposed project's built condition from locales with the greatest number of potential viewers – along Carmel Mountain Road and I-15. City and CEQA thresholds focus on public viewpoints that are accessible to the public (and by extension to the greatest number of viewers). The selected representative viewpoints that were studied in the EIR were publicly accessible and provided documentation of the visibility of site from potential off-site (including neighborhood) viewers, as well as examples of visibility compared to the existing surrounding conditions. The photographs and simulations provide adequate support for the relevant portions of the aesthetics and community character analyses. EIR Section 5.3 determined that no significant impacts would occur and no mitigation measures would be required.</p> <p>SI1-7 <b>Topical Response – Community Plan Amendments.</b> The comment is correct regarding current Community Plan Open Space designation and related policy text. Please note that private property owners may propose any legal use for their property, and the City evaluates any proposal in the light of applicable law (including CEQA requirements) and City ordinances and planning documents. The proposed project requests a Community Plan Amendment to address the inconsistency with the current designation and policy of the Plan for the closed golf course at the property.</p> <p>The City has a process for amending community plans that is outlined in the General Plan, and discussed in the project EIR Section 5.1.1.2, <i>Regulatory Framework</i>, under the heading "Local Plans and Regulations" for general discussion of how amendments are anticipated and planned for, and specific discussion of open space under the heading "Rancho Peñasquitos Community Plan." The potential impacts are addressed in Section 5.1.2.2, <i>Impact Analysis</i>, under the heading</p>
--	--

	<p>SI1-7 (cont.) "Consistency with General Plan and Rancho Peñasquitos Community Plan Designated Land Uses (Issue 1)."</p> <p>As noted, the RPCP recommends preservation of "the golf course as a unifying open space element and buffer from the freeway, and to maintain the existing quality of development in the area." As stated in Section 3.0, "the prior [golf course] owner elected to shut down in 2015, citing reduced golf course usage/revenues and higher water costs as the reasons for the closure." Since 2015, the site has not served as a recreational resource within the project area. It is currently fenced off and is not available for any sort of open space use. Since the golf course has not been accessible to the public since 2015, the EIR concluded in Section 5.1.2.2 that there would be no loss of publicly accessible open space as a result of the project.</p> <p>Moreover, the project would provide open space around the edge of the future development and construct a public park as well as publicly accessible trails within this open space. This would keep a portion of the site as an open space amenity and provide public access.</p> <p>Also, as noted in EIR Section 5.3.4.2 under the heading "Community Landmarks":</p> <p><i>It is noted that the RPCP also recommends that the golf course be preserved "as a unifying open space element and buffer from the freeway" (RPCP) but that language specifically does not identify the project site as a community identification symbol or landmark – instead the RPCP considers the site to be a buffer between existing residential uses and the industrial transportation nature of I-15. At this point in time, the loss of the property as a golf course is three years in the past, and preservation of it as such is not feasible. Rather, the project would implement compatible residential uses with substantial landscaping buffers onto the site.</i></p>
--	---

## COMMENTS

## RESPONSES

	<p>SI1-7 (cont.) Additional detailed discussion is provided in EIR Section 5.3.4.2 relative to quality of development (bulk and mass, architectural styles, project visibility and contrast, etc.). The RPCP analysis in the EIR adequately addresses the Community Plan Amendment and proposed loss of the golf course by describing the proposed project elements that would promote consistency with the community plan. These features include, but are not limited to, incorporation of open space along the site perimeter, inclusion of parks and streetscape landscaping, and proposal of residential uses that would be compatible with the existing surrounding community. These features would provide open space and buffer existing residential uses from I-15.</p>
	<p>SI1-8 Section 3.5, <i>Discretionary Actions</i>, addresses deviations on Tables 3-3 and 5.1-2, <i>Proposed Deviations</i>, which list the differences between the existing regulations and the proposed condition. The analysis in Section 5.1.2, <i>Impact 1: Potential Conflicts with General or Community Plans and potential Need for a Deviation or Variance</i>, also explicitly addresses the variations under the heading "Consistency with the Land Development Code (Issue 2)." These address the minor deviations for private exterior open space barrier height, RM-1-1 setbacks, length of lot frontage on public streets for multi-family residential, and lot widths in the OR-1-1 Open Space zone. Each of these topics was analyzed for effect and beneficial aspect. As concluded in that discussion,</p> <p><i>The preceding discussion demonstrates that the proposed development would comply with the regulations of the LDC [Land Development Code] (including any proposed deviations pursuant to Section 126.0602[b][1] that are appropriate for this location), and would result in a more desirable project than would be achieved if designed in strict conformance with the development regulations of the applicable zone and any</i></p>



## COMMENTS

## RESPONSES

	<p>SI1-8 (cont.)</p> <p><i>allowable deviations that are otherwise authorized pursuant to the LDC.</i></p> <p>A variance to the Inclusionary Affordable Housing regulations to address comparable bedroom mix between affordable and market rate units, was identified on Table 3-2, <i>Discretionary Actions Required</i>, and was also addressed in Section 5.1.2.</p> <p>The EIR adequately addresses the proposed variances and deviations, as well as the impacts of implementation of the proposed project, as designed, with the proposed variances and deviations incorporated.</p>
	<p>SI1-9 The EIR does not find that construction noise would be less than significant solely due to its temporary nature. In addition, the use of a 12-hour average in the analysis of construction noise is not inappropriate. The EIR uses an average and specifically designates the 12-hour period from 7:00 AM to 7:00 PM. This is not the only threshold that the City applies or that is analyzed in the EIR. The analysis also addressed noise levels at property lines, in conformance with City of San Diego thresholds and requirements. As stated in Section 5.4.2.1, <i>Impact Thresholds</i>, and analyzed in Section 5.4.2.2 of the EIR:</p> <p><i>A significant noise impact would occur from construction of a project if it would result in temporary construction noise that exceeds 75 dBA LEQ (12 hour) at the property line of a residentially zoned property from 7:00 a.m. to 7:00 p.m. (as identified in SDMC Section 59.0404) or if non-emergency construction occurs during the 12-hour period from 7:00 p.m. to 7:00 a.m. Monday through Saturday. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors such as day care facilities, a significant noise impact may be identified.</i></p>

## COMMENTS

## RESPONSES

<p>City of San Diego April 6, 2020 Page 3 of 5</p> <p>SI1-9 cont. <i>for a Better Environment v. California Resources Agency</i> (2002) 103 Cal.App.4<sup>th</sup> 98, 114).</p> <p>SI1-10</p> <ul style="list-style-type: none"> <li>The EIR does not adequately mitigate noise impacts. The EIR merely claims that unspecified “noise control measures” will help the Project to “comply with City standards.” EIR at 5.4-7. Such mitigation is vague and insufficient. <i>See Citizens for Responsible and Open Government v. City of Grand Terrace</i> (2008) 160 Cal.App.4<sup>th</sup> 1323, 1341 (“there is no evidence of any measures to be taken that would ensure that the noise standards would be effectively monitored and vigorously enforced”).</li> </ul> <p>The EIR fails to adequately analyze impacts to air quality.</p> <p>SI1-11</p> <ul style="list-style-type: none"> <li>The EIR acknowledges Project construction emissions and Project operational emissions. EIR at 5.5-14 &amp; 15. But the EIR fails to analyze the combined emissions, which could occur, particularly in light of the approximately 40-month construction schedule anticipated. <i>See</i> EIR at 3-15. However, combining daily emissions of 66 pounds per day of VOC’s from construction and 20 pounds per day of VOC’s from operations would exceed the 75 pounds per day threshold.</li> </ul> <p>SI1-12</p> <ul style="list-style-type: none"> <li>The EIR relies upon vehicle trip estimates from the Transportation Impact Analysis. DEIR at 5.5-15. However, as noted elsewhere in this letter, that analysis is insufficient, therefore the assumptions in the air quality analysis are flawed.</li> </ul> <p>The EIR fails to adequately analyze impacts associated with hazards and hazardous materials.</p> <p>SI1-13</p> <ul style="list-style-type: none"> <li>The EIR illegally defers analysis of the presence of underground storage tanks and other potentially hazardous materials. In <i>Communities for a Better Environment v. City of Richmond</i> (2010) 184 Cal.App.4<sup>th</sup> 70, the court observed: “Numerous cases illustrate that reliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA’s goals of full disclosure and informed decisionmaking; and consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment.” <i>Id.</i> at 92 (citations omitted).</li> </ul> <p>The EIR fails to adequately analyze impacts to public facilities and services.</p> <p>SI1-14</p> <ul style="list-style-type: none"> <li>The EIR claims the project will not have a significant effect on fire and police department response times, but this is an unsupported assertion. EIR at 5.13-8 to 9. Even though these departments do not currently meet the City’s goals for response times, the EIR dismisses deficiencies and the compounding effect of adding additional people to the overburdened system. However, the City’s CEQA Significance Thresholds for public services require consultation with</li> </ul>	<p>SI1-9 (cont.) As concluded in EIR Section 5.4.2.2, based on the SDMC construction noise limits, project construction noise (including noise generated by construction-related traffic) would be less than significant.</p> <p>SI1-10 The project complies with the San Diego Municipal Code and includes design features that result in no required mitigation. Analysis has been completed at the appropriate level of specificity.</p> <p>Details are provided in Section 5.4.2, <i>Impact 1: Exposure to Operational and Construction Noise</i>. The project would comply with decibel thresholds through design and/or distance from sensitive receptors. Noise compatibility issues are addressed through project design. As stated in EIR Section 5.4.2.2:</p> <p><i>The Acoustical Analysis Report in Appendix C provides documentation of the project noise levels for the project site, including the public and private open space/recreational areas, the private exterior open space for the proposed residences, and the interiors of the proposed homes. The results are compared to the City’s General Plan Noise Element compatibility standards and required measures to attenuate noise levels to meet City standards are provided. Those measures have been incorporated into the project plans. The potential impacts of the existing noise environment on the project do not constitute an impact under CEQA. Consistency with the General Plan Noise Element is evaluated in Section 5.1, and the proposed noise attenuation measures that have been incorporated into the project are described in Section 3.0.</i></p> <p>Section 3.3.1.9, <i>Noise Control</i>, identifies the project design elements relied upon in the technical analysis (EIR Appendix C), and the residential structure types include disclosure of exterior sound barriers, as applicable.</p>
---	--

## COMMENTS

## RESPONSES

	<p>SI1-10 (cont.) As discussed in Section 5.13, <i>Impact 2: Potential Exposure to Excessive Noise Levels</i>, on-site residences could require exterior barriers or additional architectural buffering. Figure 5.1-4 depicts the residences requiring sound barriers, and their respective height (ranging from 6 to 9 feet in height). Figure 5.1-5 identifies residences requiring interior use area noise attenuation and specifies which residences would require: (1) enhanced STC 37-rated windows, (2) STC 56-rated walls (double stud walls) and enhanced STC -37 rated windows, and (3) residences requiring double-glazed windows. Project design commitments are included in project permit conditions required during construction and would be confirmed by qualified City inspectors during structure construction. Furthermore, Section 5.4 fully analyzes the impacts of the project to off-site uses, and concludes that no impacts would occur. Therefore, no mitigation of such impacts is required. The analysis provides the appropriate level of specificity and supports enforceability through the required permit conditions.</p> <p>SI1-11 As stated in Section 3.3.2.3, <i>Construction Staging and Component Phasing</i>, development of the for-sale and rental components of the project would be constructed concurrently. Given the intensive construction period of 40 months to grade, install infrastructure, construct housing and implement landscaping and recreational amenities, concurrent construction and project operations is not anticipated. As documented in EIR Table 5.6-3, <i>Anticipated Construction Schedule</i>, demolition, site preparation, grading, building construction, paving, and architectural coating, are consecutive steps; all of which would be completed prior to residential use of the project. Because construction and operations would not overlap, it is incorrect to combine VOC emissions from Tables 5.5-5 and 5.5-6. As stated in EIR Section 5.5.3.3, <i>Significance of Impact</i>, "The project would not result in a violation of any air quality standard, nor would it contribute substantially to an existing or projected air quality violation that would contribute to a direct or cumulative impact to air quality."</p>
--	---



## COMMENTS

## RESPONSES

	<p>SI1-12 Please refer to the Response to Comment 2, above. The project vehicle trip estimates in the EIR Section 5.2 and Transportation Impact Analysis (Appendix B to the EIR) are appropriate and consistent with published City trip generation rates. The air quality analysis therefore correctly analyzes the project contribution to air quality impacts.</p> <p>SI-13 The City finds that hazardous materials were adequately analyzed. Relative to underground storage tanks (USTs), EIR Section 5.14.1.1 under the heading "Hazardous Materials Database Search," two USTs had been noted for the site as early as 1988. These two USTs were removed and received closure in 1992. As stated in EIR Section 5.14.2.3, "there are no listed hazardous materials sites on the project site or in the vicinity that could pose a threat to human health or safety." It is also noted that testing for pesticides, etc. in on-site soils did not identify significant impacts. Potential for asbestos-lined pipes was considered most likely, if present, to be associated with the main drain/sewer from the golf course (Terwiliger 2018: pers. comm.). As stated in EIR Section 5.14.2.2,</p> <p><i>... the project site encompasses an area where the previous handling of hazardous materials and petroleum products constitutes an environmental condition that could create a significant hazard to the public or environment as the ground is disturbed and structures/built materials are removed during construction. The site has a history of containing USTs and ASTs, as well as a noted potential for asbestos-containing materials in golf course pipes and the on-site sheds (one of which has been removed), as well as handling or generating hazardous materials including fertilizers, pesticides/herbicides, waste and mixed oil, diesel fuel, solvents, and gasoline, during its use as a golf course site. The potential asbestos-lined pipes are considered most likely, if present, to be associated with the main drain/sewer from the golf course (Terwiliger 2018: pers. comm.).</i></p>
--	--

## COMMENTS

## RESPONSES

	<p>SI1-13 (cont.)</p> <p><i>Based on this historical use, the applicant would be conditioned to implement a soil management plan (SMP) to address any potentially contaminated soils during demolition or grading activities in the focused areas where these maintenance activities were completed and to evaluate and dispose of piping exposed during grading (Hillmann Consulting 2016 and 2018b). An SMP routinely accompanies efforts where any prior controlled use is identified on site, and would contain worker health and safety controls, soils excavation and monitoring, management of any identified contaminated or potentially contaminated materials, and on-site re-use or (if required) off-site disposal. Part of the SMP would address potential for testing and disposal of any asbestos-containing piping identified during project grading.</i></p> <p>This measure is required in mitigation measure Haz-1, and implementation of the SMP is expressly stated to be the responsibility of the City Mitigation Monitoring Coordinator. Because the SMP deals with soils that would be encountered during construction, that mitigation is timely and there has been no improper deferral of environmental assessment.</p> <p>SI1-14 City Fire-Rescue and Police departments were involved in document review and listed under individuals consulted/preparer (see Section 11.0, <i>Individuals Consulted/Preparers</i>). As described in EIR Section 5.13.2, "impacts to public services and facilities would be significant if a project would result in the need for new or altered public service facilities, the construction of which would cause direct, adverse physical environmental impacts..." For fire, the 0.4 call per day projected to be associated with project development would not result in need for any new or improved facilities. Similarly, as stated for police, the incremental increase of residents in a largely gated community would not require new or expanded facilities.</p>
--	---

## COMMENTS

## RESPONSES

City of San Diego  
April 6, 2020  
Page 4 of 5

- SI1-14 cont. and feedback from these departments if “the project [would] substantially affect Police or Fire-Rescue response times (i.e., increase the existing response times in the project area).” CEQA Thresholds at 60.
- The EIR fails to adequately analyze greenhouse gas emission impacts.
- SI1-15
- The EIR relies primarily upon measures adopted by the State in order to meet its goals. But as the California Supreme Court has noted, such reliance is insufficient to ensure compliance – “That a project is designed to meet high building efficiency and conservation standards, for example, does not establish that its greenhouse gas emissions from transportation activities lack significant impacts.” *Center for Biological Diversity v. Dept. of Fish and Wildlife* (2015) 62 Cal.4<sup>th</sup> 204, 229.
- SI1-16
- The EIR averages construction emissions over the life of the Project. DEIR at 5.6-15. Such emissions should be calculated as they will actually occur, not averaged over a longer period of time. See *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4<sup>th</sup> 1013, 1049.
- SI1-17
- The GHG Emissions Technical Report only analyzes operational GHG emissions from 2024, the first full year of Project operation. EIR Appendix E at 18. The EIR omits analysis of GHG emissions resulting from operational sources prior to 2024. Thus, the DEIR fails to analyze potential climate change impacts of the entire Project prior to full operation.
- The EIR fails to adequately analyze water supply impacts.
- SI1-18
- There is an inadequate showing of water supply for the Project. The California Supreme Court recently identified three “principles for analytical adequacy under CEQA”: (1) “CEQA’s informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to a problem of supplying water to a proposed land use project”; (2) “an adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years”; and (3) “the future water supplies identified and analyzed must bear a likelihood of actually proving available .... An EIR for a land use project must address the impacts of likely future water sources, and the EIR’s discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water’s availability.” *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 430 – 32 (emphasis in original) (citations omitted). The EIR fails to comply with these mandates, particularly in light of recent severe water shortages throughout the State.

SI1-14 (cont.) The General Plan requires projects requesting a plan amendment to demonstrate “provision of public facilities,” (Policy LU-D.13) as one of several standard issues to be evaluated as part of the amendment process (see EIR Section 5.1.1). As stated in EIR Section 5.13.2.3, “Furthermore, the project would pay developer impact fees and a portion of future residents’ property and sales taxes would go toward fire and life protection funding.”

Impacts to public facilities and services were adequately addressed in the EIR.

SI1-15 The EIR analyzed measures beyond those adopted by the State. The EIR also addresses consistency with the City’s Climate Action Plan (CAP) by completing the CAP Consistency Checklist. As expressly stated in EIR Section 5.6.2.1, *Impact Thresholds*:

*According to the City’s Significance Determination Thresholds, projects that are consistent with the City’s CAP [Climate Action Plan], as determined using the CAP Consistency Checklist, would result in a less than significant cumulative impact regarding GHG emissions. If a project is not consistent with the City’s CAP, as determined with the CAP Consistency Checklist, potentially significant GHG impacts would occur.*

*Global climate change is inherently a cumulative impact; a project participates in this potential global impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. The City’s CAP Consistency Checklist also serves as the significance determination threshold for cumulative impacts related to climate change.*



## COMMENTS

## RESPONSES

	<p>SI1-15 (cont.) The City's CAP was publicly circulated and duly adopted by the City Council. As analyzed in the project GHG Emissions Technical Report and the EIR, the project would result in less than significant impacts based on the conclusions of the CAP checklist. This included incorporation of numerous project design measures above and beyond existing regulatory requirements (See Section 3.3.1.3 of the EIR), as well as modeling of the proposed project emissions compared with the emissions that could occur from implementation and operation of a new golf course at the project site, consistent with the existing RPCP land use designation. That analysis concluded that the project emissions would be lower than a new golf course. The evaluation also addressed General Plan Implementation Policies for reducing GHG emissions, and found the project consistent.</p> <p>SI1-16 While the air quality section of the EIR analyzes construction emissions at the time that they would occur (see Table 5.5-5), amortization of construction-related GHG emissions is used by lead agencies across California. It is industry practice to amortize construction-related GHG emissions for residential and commercial projects over a 30-year period, which corresponds to the assumed operational life of such projects. See, for example, the following two citations, as cited in the Air Quality Technical Report:</p> <ul style="list-style-type: none"><li>• <i>Association of Environmental Professionals (AEP). 2010. Spring 2010 Advanced CEQA Workshop. San Diego Chapter. May 13.</i></li><li>• <i>South Coast Air Quality Management District (SCAQMD). 2009. Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group 14. Available at: <a href="http://www.aqmd.gov/ceqa/handbook/GHG/2009/nov19mtg/ghgmtg14.pdf">http://www.aqmd.gov/ceqa/handbook/GHG/2009/nov19mtg/ghgmtg14.pdf</a>. November 19, 2009.</i></li></ul>
--	--

## COMMENTS

## RESPONSES

	<p>SI1-17 The commenter's reference to 2024 emissions in the Greenhouse Gas Emissions Technical Report relates solely to Table 6 of the report, which simply compares a year's worth of emissions against those of alternative development programs. Year 2024 was identified as the first full year of operations because: (1) the project would not be fully operational in 2023 which was estimated to be the final year of construction (i.e., all homes would not sell, and all apartments would not be rented, on day one following construction); and (2) CalEEMod modeling requires a full year's worth of data and the model's underlying assumptions regarding fleet efficiency, etc. are based on the calendar year. Subsequent years result in reduced emissions due to things like vehicle fleet turnover. Operations modeling focuses on 2024 because the partial year's-worth of emissions that would occur in 2023 would yield unnecessarily speculative results. This is supported by the fact that modeling also assumed development to begin in November 2019. That did not occur. As noted above, this delay will result in lower operational emissions impacts than was projected in the EIR; please also see EIR Table 5.5-6. Each of the emissions was substantially below significance thresholds incorporation of subsets of those numbers would not result in any change to the less than significant CEQA findings made for the project.</p> <p>SI1-18 The comment is incorrect. The Water Supply Assessment (WSA) prepared by the City Public Utilities Department concludes that the project's water demand would be consistent with regional water resource plans for the City, San Diego County Water Authority (SDCWA), and Metropolitan Water District of Southern California. The SDCWA has confirmed that the project meets the criteria for the Accelerated Forecasted Growth component of the SDCWA 2015 Urban Water Management Plan, and that its accounting of the remaining Accelerated Forecasted Growth (AFG) component will be adjusted to reflect the additional demand associated with the project. The WSA therefore demonstrates that there would be sufficient planned water</p>
--	--

## COMMENTS

## RESPONSES

City of San Diego  
April 6, 2020  
Page 5 of 5

III. The DEIR's Discussion of Mitigation and Alternatives is Deficient

The DEIR fails to adequately analyze alternatives. CEQA provides: "The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which would substantially lessen the significant environmental effects of such projects ...." Pub. Res. Code § 21002. "The purpose of an [EIR] is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." *Id.* § 21061.1.

SI1-19

CEQA requires that an EIR "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750 – 51. "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." CEQA Guidelines § 15126.6(b). "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 404. The DEIR fails to comply.

SI1-20

The Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Project. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455.

IV. The DEIR Should be Recirculated

SI1-21

The DEIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

V. Conclusion

SI1-22

For the foregoing reasons, PQ-NE Action Group urges you to reject the DEIR as drafted. Thank you for your consideration of these concerns.

Sincerely,

  
Everett DeLano

SI1-18 (cont.) supply to serve the project in normal and dry year forecasts during a 20 year projection as described in Section 5.12.2.2, *Impact Analysis*, under the heading "Supply."

SI1-19 The EIR is in compliance with the regulations from the Public Resources Code. EIR Section 8.0, *Project Alternatives*, addresses the reasonable range of alternatives identified and analyzed in the EIR that would potentially avoid or substantially lessen significant impacts of the project. For each of the alternatives, all the resource topics addressed in Section 5.0, *Environmental Analysis*, are reviewed, with environmental impacts of the alternative compared to those of the proposed project. These analyses are summarized in Table 8-1, which compares each of the topic areas, and where impact assessments may be overall consistent (e.g., significant but mitigable, less than significant) the relative effect (comparatively greater or reduced) is indicated. The EIR discussion is not deficient and no revision is required.

SI1-20 The project description and project objectives, as described in EIR Section 3.1, are appropriate. The objectives are consistent with local and regional planning for the area (including objectives related to sustainable development), City and statewide objectives to improve housing supply and address the need for affordable housing, the need for improved ingress and egress for emergency vehicles in the Glens community, and regulatory requirements to mitigate impacts to jurisdictional drainage features. The provision of analyses related to alternative development scenarios is informative to the City decisionmakers in weighing whether to approve the project as proposed.



## COMMENTS

## RESPONSES

- |  |  |
|--|--|
|  | <p>SI1-21 As discussed in each of the above responses, the comments are either incorrect and/or addressed through information provided in the Draft EIR or this Final EIR (with no changes to Draft EIR significance conclusions). There is no need to revise and recirculate the Draft EIR.</p> <p>SI1-22 Please see Responses to Comments 1 through 21, above. The EIR is adequate pursuant to CEQA and the state CEQA Guidelines.</p> |
|--|--|

## COMMENTS

## RESPONSES

**From:** John Chiu  
**To:** DSD EAS  
**Cc:** jennilim@gmail.com; Kelly Seiler  
**Subject:** [EXTERNAL] The Junipers - Project No. 586670 / SCH No. 2018041032  
**Date:** Saturday, March 28, 2020 5:39:01 PM  
**Attachments:** I-15 - SR-56 Typical Traffic.jpg  
 I-15 AM Typical Traffic.jpg

Project Name: The Junipers  
 Project No. 586670 / SCH No. 2018041032  
 Community Plan Area: Rancho Peñasquitos  
 Council District: 5

SI2-1

Hello Ms.Sara Osborn or whom it may concern, my specific comments to the project are noted below. In addition, I have a general comment that this project does not have mixed-use activity centers that are pedestrian-friendly and does not create a center of community as per the City of San Diego General Plan. This project, in it's current form, does not advance the City of Villages smart growth strategy.  
<https://www.sandiego.gov/planning/genplan>

Thanks,  
 John Chiu  
 Carmel Mountain Ranch / Sabre Springs Community Planning Group Member

SI2-2

## Section 5.2.2.2 Impact Analysis

- Included in EIR
  - o Pacific Village
  - o Merge 56
  - o Preserve at Torrey Highlands
- Not Included in EIR
  - o Aperture Del Mar (630,000-square-foot office complex Carmel Valley Road near SR-56)
  - o Trails at Carmel Mountain (Up to 1200 housing units)
  - o Millennium PQ Project #644431 (331 apartments)
  - o New Point Communities – Carmel Mountain Park & Ride (50 apartments)
- Will the projects above in included in an updated EIR?

SI2-3

## Section 5.2 Page 5.2-16

"To the extent that project completion extends beyond 2020, the projected baseline traffic growth rate in the project study area is less than one percent per year, which the TIA has considered and determined would not influence the results of the analyses in the TIA (LLG 2019). The Near-Term scenario adds traffic anticipated to be generated by three other nearby development projects in the near future, and then adds the traffic generated by the project to develop the Near-Term Plus Project volumes."  
 - At the time of the development of the EIR, the Near-Term scenario did not include the

SI2-1 As described in EIR Section 5.1.1.2:

*The General Plan incorporates the City of Villages strategy to focus growth into compact, mixed-use, walkable centers linked to an improved regional transit system. A "village" is defined as the mixed use community or neighborhood center where residential, commercial, employment, and civic uses are integrated by pedestrian-friendly design characterized by inviting, accessible, and attractive building frontages, streets, and public spaces. This compact urban form reduces the need to travel and makes alternative modes of transportation easier to use.*

The villages strategy as described in the General Plan addresses entire communities and identifies that growth should be focused into areas supporting a mix of uses, as well as focus on integration of uses via pedestrian-friendly design. High quality transit options are available at Sabre Springs Transit Center and Rancho Bernardo Transit Station located to the south and north, respectively, with the project having access to them, as depicted on EIR Figure 3-18c (additionally addressed in the EIR citation below).

The project is not proposed as a stand-alone "village," but instead comprises an infill development contributing to the

## COMMENTS

## RESPONSES

SI2-1 (cont.) overall Rancho Peñasquitos community. The project is designed to be walkable, uses pedestrian friendly design, incorporates public spaces and connects to existing regional transit. The on-site social loop trail, sidewalks and bike lanes are designed to connect to existing off-site sidewalks and crosswalks (see EIR Figure 3-9a). This includes connections to existing sidewalks along Peñasquitos Drive, Del Diablo Way, Del Diablo Street and Carmel Mountain Road, that lead to Rolling Hills Elementary School ball fields and through the residential neighborhood. Bicycle travel also would be accommodated and would connect to existing Class II bike lanes (see EIR Figure 3-9b), located along Peñasquitos Drive and Carmel Mountain to meet facilities along Rancho Carmel Drive and provide bike lane access to both sides of Carmel Mountain Plaza. Consistency with each of the General Plan elements is assessed in Section 5.1.2.2. As described in EIR Section 5.1.2.2 specific to public transportation:

*The project would increase the intensity of uses in a previously developed area in close proximity to regional uses, including shopping and employment centers and a regional park. In addition, the southeastern edge of the project site would be within five minutes (i.e., 0.25 mile by walking, 0.75 mile by biking, and 2.0 miles by vehicle) of existing and planned transit stations in the region, consistent with the City of Villages Strategy to add housing in proximity to transit. The site is approximately 2.0 miles from the Rancho Bernardo Transit Station (accessible from the project site by the MTS Route 20 bus with stops within 0.15 miles of the site) and 1.0 mile from the Sabre Springs/Peñasquitos Transit Station and Parking Structure (an approximate 15-minute bike ride or a 5 minute drive); both of these stations provide access to all three major BRT services currently operating from North County throughout the San Diego region.*



## COMMENTS

## RESPONSES

	<p>SI2-1 (cont.) This supports the General Plan aspiration regarding placement of growth into areas linked to a regional transportation system and supporting pedestrian-friendly design.</p> <p>SI2-2 The traffic analysis looked specifically at cumulative projects known to the City at the time of issuance of the project Notice of Preparation (NOP) of an EIR. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.</p> <p>SI2-3 The project's Transportation Impact Analysis addressed cumulative projects that were known at the time that the project NOP was issued. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information regarding projects that were not known at the time of the NOP. As noted in the comment, the transportation analysis methodology accounts for additional cumulative trips from additional cumulative projects that may occur after the issuance of the project NOP by adding an average of one percent traffic growth in the area per year between 2020 and 2050. The one percent annual growth shown over a 30-year period represents the anticipated growth that would be expected to occur based on traffic forecast projections from the SANDAG regional travel demand model. This is a standard practice that is representative of future project contributions and is sufficient for the project's 2050 cumulative transportation analysis purposes.</p>
--	--

## COMMENTS

## RESPONSES

SI2-3  
cont.

new projects noted above. Will these new projects be included in an updated Near-Term scenario?

- If not, how will they be considered for other PQ/CMR projects in the near future? (from a process review standpoint)
- The baseline traffic growth identified above is 1%. Is that still a valid assumption with the numerous projects planned in the SR-56 corridor?

SI2-4

## Table 5.2-5 EXISTING PLUS PROJECT INTERSECTION OPERATIONS

- To what extent does Intersections 2 & 3 (Carmel Mountain Rd/I-15), and 10 & 11 (Ranch Penasquitos Blvd/SR-56) factor in extensive traffic backups on the I-15/SR-56 in the mornings/evening peak hours? (see attached pictures)
- This table does not evaluate impacts to major corridors SR-56/I-15 due to this project as well as proposed projects along the SR-56 corridor as part of the Near-Term Analysis.

SI2-5

## Figure 5.2-2a Project Daily Trip Distribution

- The project distributions for SR-56 (11% west) and I-15 (25% to south, 20% to north) appear to be low considering that there are no new job centers in the immediate Rancho Penasquitos or Carmel Mountain Ranch. How were these distributions determined, beyond the "engineering judgment" described?

SI2-6

## Section 5.14.3 Impact 2: Fire Risk &amp; Appendix K4

- Will the fire evacuation plan be updated to include additional housing projects in Carmel Mountain Ranch? Has the evacuation plan included regional impacts for other nearby communities such as 4S Ranch, Del Sur, Rancho Bernardo, and Carmel Mountain Ranch that will also use the same Evacuation Routes and major transportation corridors?

Virus-free. [www.avg.com](http://www.avg.com)

SI2-4

The operations of the intersections are related to, but not responsible for, main-line back-ups on the I-15 or SR-56. The on-ramps are metered. The meters release traffic onto the state facilities based on mainline loading, with access intervals increased or decreased based on levels of main-line congestion. As shown on EIR Table 5.2-1, intersections 2 and 3, addressing the Carmel Mountain Road and I-15 northbound and southbound ramps, respectively, as well as intersections 10 and 11, addressing Rancho Peñasquitos Boulevard and SR-56 westbound and eastbound ramps, respectively, currently operate at acceptable levels of service providing access to or exit from these facilities with one exception. Intersection 11, the eastbound SR-56 on-ramp, currently operates at Level of Service (LOS) E. These same LOS values continue with the addition of the project under existing plus project conditions. Please also refer to Response to Comment 4 of DeLano (Letter SI1), which addresses thresholds for ramp and freeway mainline analysis and Project findings.

The comment is correct that the traffic analysis does not evaluate impacts to I-15 or SR-56; this was based on a screening threshold. Please refer to Response to Comment 4 from DeLano (Letter SI1) regarding thresholds for freeway and metered ramp analysis. City triggers for freeway analysis are based on project-specific contributions, and are not based on cumulative projects. Please also note that Caltrans provided a letter (Letter SI1) and did not identify a need to address main-line or ramp function.

	<p>SI2-5 <b>Topical Response – Vehicular Trip Distribution.</b> As shown on the City Traffic Impact Study Requirement Flowchart in the City's 1998 Traffic Impact Study Manual, manual trip assignment is appropriate for a project generating under 2,400 ADT. Regarding specifics, as described in EIR Section 5.2.2.2 under the heading "Trip Distribution":</p> <p><i>Trip distribution was based on the existing travel patterns in the area, the proximity of the project land uses to complementary uses, proximity to I-15, the type of housing proposed, and general knowledge of the area. Residents of age-qualified housing include both retirees who would tend to avoid unnecessary peak hour trips and travel to a variety of local and regional destinations, and those still in the workforce whose travel patterns reflect that of a more typical commuter.</i></p> <p><i>Using the above-mentioned assumptions, approximately 20 percent of the daily project trips were regionally distributed on I-15 to the north, with 25 percent to the south and 11 percent oriented to/from the west on SR-56. The remaining 44 percent were distributed to the local network.</i></p> <p>SI2-6 Changes to the existing plan are not proposed. Fire and law enforcement agencies involved in implementing an evacuation order do not rely on a residential subdivision evacuation plan. Individual residential subdivision evacuation plans, including for the proposed project, have been prepared as a tool to help residents be aware of wildfire evacuations, their potential evacuation routes, and the fact that they may be directed to stay in their homes in lieu of evacuating. As such, this information is project-specific regarding adequate ingress/egress during emergencies. The disclosure of this information in Section 5.14.4 of the EIR is adequate and appropriate. Further, Incident Commands and law enforcement are not bound by subdivision-specific evacuation plans.</p>
--	---

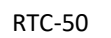


## COMMENTS

## RESPONSES

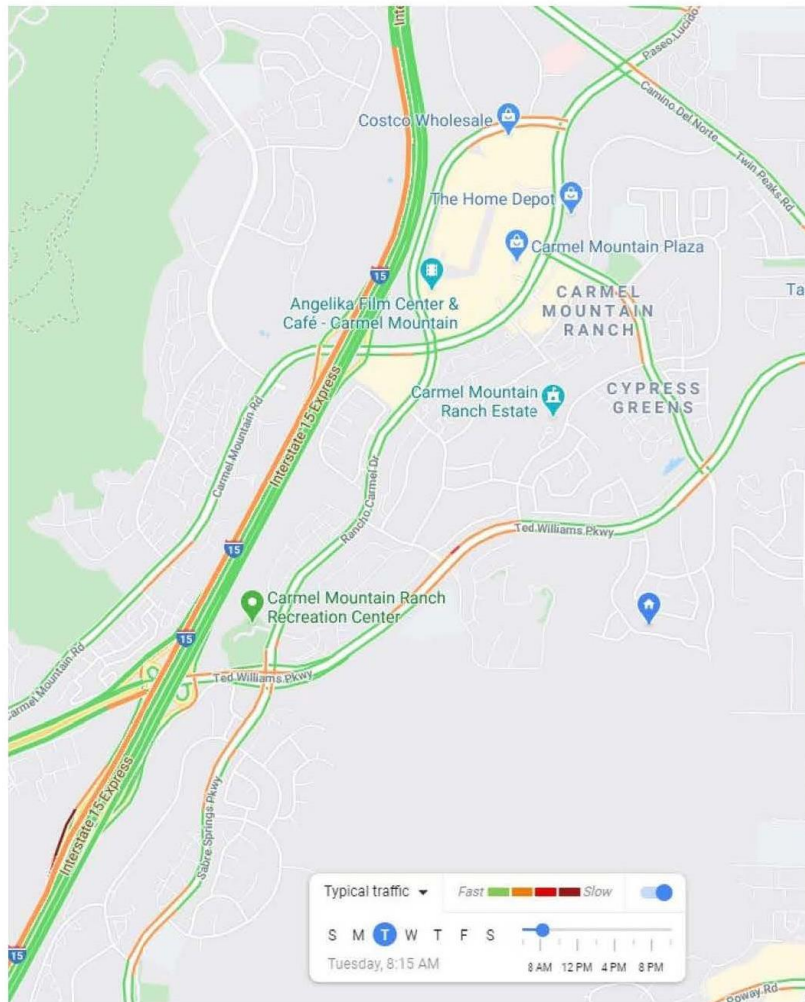
	<p>SI2-6 (cont.) Instead, evacuation managers rely on situation awareness that dictates decision making and where possible, on wildfire pre-plans. The wildfire pre-plans are an operational tool provided to emergency responders that provide high-level fire environment, assets at risk, preferred evacuation approaches, and other safety information to responding personnel.</p> <p>Large-scale evacuations are complex, multi-jurisdictional efforts that require coordination among many agencies and organizations. Emergency services and other public safety organizations play key roles in ensuring that an evacuation is effective, efficient, and safe. Please see Section 3 of the Evacuation Plan regarding City evacuation planning actions and coordination.</p>
--	--

## RESPONSES



COMMENTS

RESPONSES





## COMMENTS

## RESPONSES

**From:** [stephanhaight@yahoo.com](mailto:stephanhaight@yahoo.com)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Draft EIR Comment - Project Name: The Junipers / Project No. 586670  
**Date:** Saturday, April 04, 2020 8:52:58 PM

Dear Ms. Osborn:

In review of the subject draft EIR, please acknowledge receipt of, consider, and, respond to the following 25 items:

(If nothing else, please see item 21 )

SI3A-1

1. This project/plan calls for a change to the community plan. My understanding is that a community plan amendment must demonstrate a benefit to the community. How can removing an "open space" which offers a clear recreational benefit to the entire community of San Diego, plus, contributes as one of the defining characteristics of the local community, as the oldest development in all of RPQ, and, finally, brings a significant element of prestige to the local community, and, instead, placing a bunch of additional housing on that property, create any sort of benefit? If the owners of the golf course cannot turn a profit as a golf course, should they not simply sell it to somebody who is willing to work within the intent of the community plan?

Please demonstrate what benefit this amendment to the community plan would bring to the community of RPQ – for whom it was intended? Why would the existing community plan not be adhered to? What is the purpose of having a community plan, or, any other form of guideline of law, if the are not adhered to when perceived to be inconvenient by someone with a potential source of tax revenue? (Please also see 5.1-33 and 34 "RP Community Plan" particularly item 6)

SI3A-2

2. The CUP governing both the Junipers and Millennium PQ properties stipulate that the owners of the tennis courts and rec facilities make these available to the local community for use. I believe this is captured in the community plan as well. This (community rec) section of the properties was split in half, between "Junipers" and hotel owners, when the tennis courts property was acquired by the owner of the Junipers in 2018. This sale may have been, technically, illegal, as it may have been a violation of the CUP governing their "ownership". Can you comment on this, please? (The golf course property, itself, was split away from the hotel in 2006). The Junipers plan now calls for the primary entrance and the sole, standard exit from the community to pass over these tennis courts.

What alternate recreational benefit is being offered to the community of RPQ, to compensate for the removal of these rec facilities from local public use?

**SI3A-1 Topical Response – Project Benefits.** The applicant has proposed amendments to the General Plan and Community Plan. The environmental impacts of the proposed amendments are addressed in the EIR. Please refer to the Response to Comment 7 from DeLano (Letter SI1) for additional information.

Although these comments do not address adequacy of the EIR, the comment is correct that the General Plan requires projects requesting a plan amendment to demonstrate additional public benefit. Policy LU-D.13 is one of several standard issues to be evaluated as part of the amendment process (see EIR Section 5.1.1). The General Plan does not list specific benefits, however, the project would provide candidate benefits beyond typical requirements relative to: on-site affordable housing units, public park acreage, additional publicly accessible recreational uses, and emergency vehicle access and egress options for existing Glens neighborhood residents, (see EIR Sections 3.1.1.2, 3.3.1.5, and 3.3.1.6, as well as additional description/analysis in Sections 5.13.2.2 and 5.14.2.

Comment noted regarding sale/ownership of the golf course. As discussed on pages 5.1-40 and 5.1-41 of the EIR, this would require that the site be purchased and the golf course rebuilt by a golf course developer/operator or by the City of San Diego.

## COMMENTS

## RESPONSES

	<p>SI3A-1 (cont.) Community plans may be modified as conditions (including the goals of a community or city overall, as well as those of a property owner) change over time. Please also refer to Response to Comment 7 of DeLano (Letter SI1) regarding the community plan amendment process and how amendments are anticipated and planned for.</p> <p>The less than significant nature of potential impacts is addressed in Section 5.1.2.2, <i>Impact Analysis</i>.</p> <p>SI3A-2 <b>Topical Response – Tennis Courts and Alternative Recreational Amenities.</b> The comments relative to retention of Hotel Karlan recreational facilities do not address the adequacy or accuracy of the EIR. The project proposes to rescind the existing CUP, as specified in EIR Section 3.5 and Table 3-2, <i>Discretionary Actions Required</i>, and change the existing underlying RS-1-14 zone to RM-1-1 and RM-3-7 residential zones and OR-1-1 and OP-1-1 open space zones. Changes to the RPCP text relative to deletion of the tennis courts are addressed in EIR Section 5.1.2 in the list of specific amendments to the RPCP. Please refer to Response to Comment 5 from DeLano (Letter SI1) for information regarding Millennium PQ. The comment is correct that the Rancho Peñasquitos Community Plan suggests that the private tennis courts and swimming club facilities (located on hotel property that was not part of the acreage sold to the Junipers applicant) “should be retained” on page 96. The hotel is now closed, and although the project-proposed amendments to the community plan would affect only golf course and tennis court uses, these previous private facilities are not currently available for paid use as they were in the past when the hotel allowed paid access.</p> <p>Alternative recreational amenities are proposed by the project, which is consistent with the intent of the Community Plan for recreational amenities to be accessible to the larger community.</p>
--	--

## COMMENTS

## RESPONSES

SI3A-2 (cont.) The proposed neighborhood park currently is planned to include a game plaza, children's play slope, playground, picnic areas and dog runs, among other amenities (see EIR Figure 3-10b). Specific to this public park, note that development of the park is subject to the City's GDP process, which obtains public input as to what the park should contain. It is also noted that the publicly accessible 2.75-mile-long social loop trail with dog park and private mobility zone/bicycle hub/park area east of Private Driveway V would be open to public use through a recreation easement. The latter facility would have a basketball court and pickleball court.



## COMMENTS

## RESPONSES

- SI3A-3 3. RE: 8.4.1... Why were no project alternative considered? The golf course property is permitted for exactly that purpose. And the owners deemed it to be not profitable due to increasing water costs. Why was a less water-intensive recreational use not considered for the property, to maintain maximum compliance with zoning, and intent for the property?
- SI3A-4 4. S.1.1 Has the impact of the (rain water) flows that are “ultimately conveyed to (year round) Penasquitos Creek” been properly considered? As Penasquitos Creek is one of the few year-round watersheds in San Diego county, and vital to local wildlife.
- SI3A-5 5. S.1.2 Item 1 City (of San Diego) housing supply “needs” are based on what? The greater San Diego area is bordered by the Pacific (to the West), Mexico (to the South), Mountains and Desert (to the East), and, Camp Pendelton (to the North). Additionally, much of San Diego is hill country – which is inherently-challenging for development. Additionally, the country is considered semi-arid desert; and, water supplies (among others) are already severely limited. Scarcity of resource limits availability, and, increases cost. This does not constitute “need”. Please explain the drivers behind this “need”?
- SI3A-6 6. S.1.2 Item 4... How does this proposed development effectively and reasonable tie into public transit? Please explain this?
- SI3A-7 7. S.1.2 Item 6... “Reconstruct the on-site drainage ...resulting in a gain in native habitat;” How can replacing 112 acres of grassland and trees with housing and roads result in a “gain in native habitat”? I contend this is a blatant misrepresentation of intent. I would ask that the city request an independent audit of the impact to “native habitat” by this proposed development, by certified ecological experts, before granting any approvals. Is this possible?
- SI3A-8 8. (follow up on 7, above). Page S-12 (Table S-1... “Biology”) The impact of all this development, replacing 112 acres of grass and trees, as having a “less than significant” impact seems absurd. This statement should be corroborated by and INDEPENDENT and INDEPENDANTLY FUNDED environmental engineering group. Please confirm if and how this would be possible to accomplish? Is a lawsuit our only avenue to adequately protect the environment?
- SI3A-8 9. S.1.2 Item 8... “Improve emergency access and enhance egress routes...” I contend this is a blatant falsehood and that this proposed development, instead, represents an unacceptable decrease in public emergency evacuation (and access) safety. Please refer to 21, below (III) and comment?
- SI3A-9 10. S.5.2 “No Project/Development Per Community Plan”... This section appears to be written with incredible bias, insinuating that NOT developing the property as proposed by the Junipers constitutes a lost opportunity. I contend that there are a myriad OTHER POTENTIAL USES for this property, that are in keeping with the community plan, that would NOT propose a significant increase in risk to public safety (traffic & fire evacuation) as the “Junipers” proposal does. Redeveloping as a low-water use golf facility, or, as a year-round soccer field complex (with mixed grass and artificial turf) are just two solutions that seem MUCH more beneficial to the local communities, AND, the long-term benefits of San Diego as a whole.

SI3A-3 **Topical Response – Project Alternatives and Zoning.** Per CEQA Guidelines Section 15126.6(a):

*An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, **which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project**, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.* (emphasis added)

As such, a project is required to review feasible alternatives that would lessen or eliminate significant environmental impacts. In this instance, based on project design, including proposed intensity of use, incorporation of hardscapes and drought-tolerant native vegetation, and use of high-efficiency irrigation technologies (see Section 3.3.1.3, *Sustainable Design Features*), significant impacts were not identified to water use. As a result, no alternative is needed to address reduced water use.

Alternatives evaluated for the project comprise Section 8.0, *Project Alternatives*, of the EIR. Alternatives reviewed include an alternative site, a no project/no development alternative, a no project/community plan consistency alternative, a reduced intensity alternative, and an existing zoning alternative. These are considered to comprise a “reasonable range” of design scenarios for the site, as they address the options of no development, development with a new golf course, development in accordance with existing zoning, and development at a lower intensity to address impacts such as air quality and traffic. Two of these alternatives reflect the commenter’s requests for evaluation.

## COMMENTS

## RESPONSES

SI3A-3 (cont.) Please also note that the site is zoned for residential use and generally, the proposed project is not in conflict with zoning (see Section 2.4.4 of the EIR and as shown in Figure 2-6). The existing zoning equates to 831 residences on site, which is 295 more homes than proposed. This alternative is described in EIR Section 8.3.2, *Existing Zoning Alternative*. However, the project proposes a rezone in conjunction with the community plan amendment to allow development of the project.

The community plan intends the site to be used as open space, specifically a golf course. Please refer to the Response to Comment 7 of the DeLano letter (SI1) regarding golf course development and closure. The project proposes a community plan amendment (see EIR Figure 5.1-2) which would retain approximately 40 acres of the 112.3-acre site as open space, including a neighborhood park. The remainder of the site would be redesignated as residential use for the development of housing. Specifically, the community plan amendment would designate the project site as low-medium residential (63.85 acres), and open space (39.57 acres). The latter includes the public neighborhood park (2.87 usable acres). The project would also include recreational amenities within the open space, such as the social loop trail, dog park, and pickle ball courts, etc. The neighborhood park would include recreational amenities per the GDP, including a dog park, children's play areas, picnic and game areas, and a large turf area.

Given all of these considerations, it is concluded that alternatives were considered, the range of alternatives is reasonable, and the alternatives specifically deal with the zoning and intent shown in existing planning documents.

## COMMENTS

## RESPONSES

SI3A-4 Overall, these comments request information and do not address adequacy of the EIR. Yes, storm water flows and project construction and operations have been carefully reviewed and analyzed in compliance with state and local regulations regulating water quality. A Drainage Study and Storm Water Quality Plan were prepared for the project and are included in Appendices G1 and G2 of the EIR, respectively. Please refer to detail from these reports and other sources, provided in Sections 5.9.2 and 5.9.5. As concluded in Sections 5.9.2.3 and 5.9.5.3 respectively:

*The project storm drain system would be designed to accommodate storm flows per applicable City requirements, and runoff leaving the site would be regulated by the proposed detention/water quality basins such that no net increase in off-site peak 100 year storm flow rates or amounts would result from project development. Accordingly, potential impacts from project implementation related to runoff rates/amounts and associated potential storm drain capacity, flooding, erosion/ sedimentation, and hydromodification effects would be less than significant (with additional discussion of potential erosion/ sedimentation effects provided below in Section 5.9.5).*

and

*Based on the implementation of the project design elements, including construction and post-construction BMPs, related maintenance efforts, and required conformance with City storm water standards and associated requirements (including the NPDES Construction General, Municipal and Groundwater permits), potential construction and long-term project related pollutant discharge and water quality impacts would be less than significant.*



	<p>SI3A-4 (cont.) Project design meets City standards designed to retain and improve off-flow and water quality downstream impacts. Downstream adverse impacts to Peñasquitos Creek are not anticipated (see Section 5.9.5.3), and therefore associated impacts to wildlife also would not occur.</p> <p>SI3A-5 <b>Topical Response - Housing Need and Site Utilization.</b> San Diego's housing supply needs are based on the General Plan Housing Element which was recently updated and the Housing Element also includes a Regional Housing Needs Assessment (RHNA) which is adopted by SANDAG. As described in EIR Section 7.1.4, <i>Population and Housing</i>:</p> <p><i>There is a recognized housing shortage both in San Diego County and statewide, that is contributing toward rising rents and housing costs, and there is evidence that these conditions are adversely impacting housing opportunities for seniors and low income persons. According to the San Diego Housing Commission (SDHC), San Diego's economic success and population growth over recent years have not been met with proportionate growth in the number of housing units. Over the past decade, population growth has averaged 1.2 percent per year – more than double the rate of housing growth at 0.5 percent per year. Given demographic trends, which estimate the number of older adults aged 65 and above will double by 2030, a good portion of the unmet need for housing units in the coming decades will directly impact older adults. It is estimated that the City of San Diego could fall short of its 2010-2020 Regional Housing Need Allocation (RHNA) goals (as set by SANDAG pursuant to state mandate) by as much as 50,000 units, based on past and current housing production trends. The SDHC estimates that the City of San Diego will need to add between 150,000 to 220,000 housing units by 2028 (SDHC 2017). Thus, the additional age-restricted (55+) market rate and low income housing units proposed by the project would help to</i></p>
--	--

SI3A-5 (cont.)

*meet the existing and projected need for additional housing in the City of San Diego, including the need for additional senior housing and affordable housing.*

This is confirmed and expanded upon in the City's June 2020-adopted General Plan 6th Cycle Housing Element, which states in the introduction:

*The 6th Cycle Housing Element update comes at a critical time because San Diego is experiencing a housing crisis. To meet growing demand for housing, the City targeted to permit more than 88,000 new housing units between 2010 – 2020, but less than half of those units were constructed (42,275) as of December 2019. Of those units that were constructed, the majority were affordable only to households making more than 120 percent of the City's area median income (AMI); in 2019, AMI was \$86,300.*

*The San Diego Regional Economic Development Corporation (EDC) estimated in October 2019 that 57 percent of the median household's income in San Diego is being spent on housing and transportation. The EDC also estimates that about 57 percent of renters and 34 percent of homeowners are cost-burdened (spend more than 30 percent of household income on housing). In addition to these existing challenges, San Diego is projected to add nearly 154,000 jobs between 2012 – 2035 even as the population of senior residents is projected to nearly double, growing from 11 percent to 18 percent of the population.*

As stated in Section 5.1.2.2 of the EIR:

*The site is currently underutilized at a time when the City is seeking potential parcels for development of senior and affordable housing due to an existing shortage of this resource.*

## COMMENTS

## RESPONSES

	<p>SI3A-5 (cont.)</p> <p><i>...the proposed residential community, with associated parks and recreational amenities, would be compatible with the adjacent Glens neighborhood, which is predominantly single-family residential... Redevelopment of the site as an age restricted, 55+ community with affordable housing would be consistent with more current City housing, recreation, and mobility goals for the area.</i></p> <p>The EIR adequately addresses population and housing impacts and no change to the EIR is necessary.</p>
	<p>SI3A-6 The southeastern portion of the project site is within 2,000 walkable feet (relatively level, lighted walkways) of existing eastbound and westbound bus stops adjacent to Carmel Mountain Road. Class II bike lanes are also proposed, connecting Peñasquitos Drive and Carmel Mountain Road through the project via Private Driveways A and V in both directions of travel (refer to EIR Figure 3-9a, <i>Site Connectivity Map</i>). Figure 3-9b, <i>Local Connectivity Map</i>, shows the site location relative to the Carmel Mountain Plaza major shopping/commercial amenity (just across I-15), off site proposed and existing bike lanes, bus stops, park &amp; ride locales, and the Sabre Springs Transit Center. Figure 3-9c, <i>Regional Connectivity Map</i>, provides further context for these resources by continuing south to Poway Road and north to Rancho Bernardo Road, additionally showing connections from the project to the Rancho Bernardo Transit Station.</p>
	<p>SI3A-7 The project's biological analysis sufficiently analyzes potential impacts on area biological resources resulting from the project. The project biological analysis was completed by a qualified technical consultant, consistent with City requirements to evaluate sites with potential to contain sensitive biological resources. The findings were that that the abandoned,</p>

## COMMENTS

## RESPONSES

	<p>SI3A-7 (cont.) non-irrigated golf course does not support native biological habitat. No native habitats were recorded. As shown in Section 5.8, <i>Biological Resources</i>, Table 5.8-1 and Figure 5.8-1, existing habitats included eucalyptus woodland, non-native vegetation, disturbed land, and developed land. The EIR statements regarding an increase in native habitat refer to the reestablishment and replanting (with a palette including native species) of an existing 0.15-acre of on-site earthen and concrete drainage ditch that currently supports no native vegetation. As described in Section 3.3.1.7:</p> <p><i>An existing non-wetland, man-made ditch that trends through the eastern portion of the site is subject to the jurisdiction of the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and California Regional Water Quality Control Board (resource agencies).... The project plans depicted in this section of the EIR reflect the proposed on-site mitigation concept for the on-site mitigation that is under review by the resource agencies. As shown, the drainage would be reestablished along the eastern perimeter of the site and enhanced with native wetland habitat, such as southern willow scrub, mule fat scrub, and baccharis scrub. Only non-invasive landscape species would be permitted adjacent to this biology mitigation area.</i></p> <p>This would include an approximately 2.4-acre (1,750-linear-feet) biological open space component in the eastern portions of the site to support both native riparian and native upland scrub habitat elements. As shown on EIR Figure 5.3-5b, the mitigation area would include baccharis scrub, mule fat, and southern willow scrub plant palettes.</p> <p>SI3A-8 Please refer to the Responses to Comments 23 through 25, below, which focus on evacuation analyses. Please also refer to Response to Comment 1 from Derbique (Letter SI4) for additional related information.</p>
--	---



## COMMENTS

## RESPONSES

SI3A-9 Comments noted. Relative to alternatives addressed in Section 8.0, *Project Alternatives*, CEQA requires evaluation of a reasonable range of feasible alternatives to the project that minimize or avoid significant impacts assessed to a project. Private property owners may propose any legal use for their property, and the City must then evaluate the proposal in the light of applicable law (including CEQA requirements) and City ordinances and planning documents. Please note that no significant safety impacts were identified based on traffic or fire (see EIR Section 5.14, *Health and Safety*), and the only significant traffic impacts (at two intersections) would be mitigated to a level that would surpass the existing, without project, condition. (Intersections at Peñasquitos Drive with Janal Way and Cuca Street would be improved from Level of Service (LOS) C/B and E/C, respectively shown on EIR Table 5.2-1 to A/A in all future conditions as shown on Tables 5.2-12 and 13). Similarly, water use was not identified as a significant impact (see Response to Comment 3 of this letter). As such, there is no need to identify alternatives to minimize or avoid these effects.

## COMMENTS

## RESPONSES

SI3A-9 cont.	Why were such, alternate, and very viable alternatives not considered?	
SI3A-10	11. Page S-11 (Table S-1 "Summary of Significant Impacts and Mitigation") Both, TRA-1 and TRA-2 are found to have a "less than significant" significance, after mitigation. This insinuates that all of the traffic coming out of the Junipers, 99% of which will have to turn left through the new roundabout; and, all of the traffic coming out of the proposed Millennium PQ apartments, 99% of which will have to turn left at the proposed 4-way traffic light, will have a "less than significant" impact to the current, prevailing traffic, which flows at 40 mph as it approaches the Carmel Mountain / Pensasquitos Drive intersection. This statement is ludicrous! And, a significant safety concern to the existing community residents. Could you, please, provide insight on the expert, real-world, analysis that substantiates that the traffic (& safety) impact would be "less than significant"?	SI3A-10 The project EIR and Transportation Impact Analysis (Appendix B to the EIR) addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. Each of the street improvements proposed by the project, including the proposed roundabout and signal, will be designed to City standards (EIR Sections 5.14.4.2 and 5.14.4.3), including elements such as width, grade (slope), line of sight, and requirements for safe travel of pedestrians, cyclists, community vehicles and emergency response vehicles, such as fire trucks. Because these design standards will be complied with, safety impacts would be less than significant.
SI3A-11	12. 2.4.1 "City of San Diego General Plan" Given the Historic and transformational nature of the Novel Corona Virus, and COVID 19, should the SDGP be re-evaluated?	
SI3A-12	13. 2.4.2 "RP Community Plan" This section illustrates the reason and the importance of the community plan, and that it clearly calls for this property to be a golf course / open space (among other things). What is the rationale behind calling out the importance of this document, and, the clarity of its definition for this particular piece of land, and NOT demanding that a developer do everything possible to try and comply? If this is not the case, what is purpose of having a community plan, with such clear definitions of purpose?	SI3A-11 Comments noted. Overall, these comments request information and do not address adequacy of the EIR. Development of City planning documents is a separate planning process from the CEQA review for the project EIR. The comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require response.
SI3A-13	14. 2.4.4 "Zoning". The "underlying" zone for this (golf course) property is governed by CUP 5206, originally issued in 1962. It was never intended to be used for RS-1-14, as the CUP clearly identifies it as intended as a golf course, and, attempting to classify the property as being zoned for residential is false. Please advise our legal course of action to make sure this issue is not "glossed over"?	
SI3A-14	15. 2.4.6 "Regional Air Quality" To be compliant with air quality & greenhouse gas mandates (referenced elsewhere) this project should have CLEAR AND CONVENIENT access to functional public transport. Does it? Additionally, the availability of parking spaces within the community should be severely limited, to force residents to be dependent on public forms of transport, to help comply with California's long-term greenhouse gas reduction mandates. Does it do this?	SI3A-12 Overall, these comments request information. The comment poses philosophical questions that do not directly address the accuracy or adequacy of the EIR. For clarification, however, please note that an alternative addressing retention of golf course uses is included in EIR Section 8.0, <i>Project Alternatives</i> . In addition, a Community Plan Amendment is proposed by the project, as described within the EIR in Section 3.5, <i>Discretionary Actions</i> , and 5.1.2.2, <i>Impacts (Land Use)</i> . The RPCP recommended preservation of "the golf course as a unifying open space element and buffer from the freeway, and to maintain the existing quality of development in the area." Since the golf course has not been accessible to the public
SI3A-15	16. 3.3 "Project Characteristics" RE: "The California Legislature has declared ... authorized specialty housing for citizens 55 years of age, and over." The California Legislator has also issues mandates for greenhouse gas reductions; and, placing new developments near public transport access such as light rail. Are there plans to run a light rail system to within walking distance of the Junipers development? If not, is this not a violation of the mandate that this section is referencing/using as justification for development?	
	Additionally, RE: 3.3.1.4 "Project Parking" ... "1,160 vehicle parking spaces for the 455 for sale units" plus 81 more vehicle parking spaces, make it clear that the developers have no	

## COMMENTS

## RESPONSES

	<p>SI3A-12 (cont.) since 2015, the EIR concluded in Section 5.1.2.2 that there would be no loss of publicly accessible open space as a result of the project. Moreover, the project would provide open space around the edge of the future development and construct publicly accessible trails within this open space. This would keep a portion of the site as an open space amenity and provide public access.</p> <p>SI3A-13 Overall, these comments request information and do not address adequacy or accuracy of the EIR. In addition, the comment incorrectly identifies existing zoning as not being residential in nature. The Project site's base zone is RS-1-14, Residential – Single Unit. This zone designation allows golf course use with a Conditional Use Permit (CUP). Relative to existing and proposed zoning categories and their effect, please refer to Response to Comment 3 above. Specific to the CUP, The EIR acknowledges the existence of a CUP and proposed the rescission of the CUP (EIR Section 3.5, <i>Discretionary Actions</i>). The prior approval of the CUP allows the use and development of a golf course but did not change the underlying zone. Regarding the assertion that the site should be developed as a golf course, please also refer to Response to Comment 3 of this letter, as well as Response to Comment 7 from Delano (Letter SI1) regarding golf course closure and recreational amenities proposed by the project.</p> <p>SI3A-14 <b>Topical Response - Climate Change and Public Transportation.</b> Air quality and greenhouse gases (GHGs) are addressed in Sections 5.5, <i>Air Quality</i>, and 5.6, <i>Greenhouse Gas Emissions</i>, respectively. The elements noted in the comment (proximity to public transport and limitation of available parking) certainly can have a positive effect on vehicular emissions, however the required project review under CEQA and City thresholds and Climate Action Plan (CAP) compliance requirements is broader than that. Specific to GHGs,</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI3A-14 (cont.) compliance with the City's adopted CAP (2015) ensures compliance with state mandates.</p> <p>Relevant legislation/regulatory requirements, such as AB 32 and the associated CARB Scoping Plan (CARB 2008), the four primary goals of the City CAP, and the results of the City CAP Consistency Checklist analysis for the project showing how project emissions comply with CEQA and the City's Climate Action Plan, are addressed in EIR Section 5.6.1.2. The checklist contains measures to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. To reiterate, projects that are consistent with the CAP are assessed as having less than significant GHG emission impacts and to appropriately support the City in complying with AB 32.</p> <p>The CAP Checklist that is part of EIR Appendix E documents that the project would not impede the City's ability to implement the actions identified in the CAP to achieve the CAP's targets and associated GHG emission reductions, and would not generate greater GHG emissions than the prior golf course use on the project site.</p> <p>In addition, the City's General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. The policy language includes sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency.</p> <p>Ultimately, therefore, a project's criteria pollutant and/or GHG emissions are related to vehicular use, availability of alternative modes of transportation (e.g., transit as mentioned by the commenter), amount of potable water used, types of landscaping, whether there are wood-burning (or even gas-burning) fireplaces associated with a dwelling, types of</p>
--	---



## COMMENTS

## RESPONSES

	<p>SI3A-14 (cont.) roofing, availability of photovoltaic panels, etc. All of these factors (and more) feed into air quality and greenhouse gas emissions analyses. As documented in Section 5.5 in Tables 5.5-5 and 5.5-6, the criteria pollutant emissions during period of maximum construction or operation are well below thresholds of significance. No significant impacts would occur.</p> <p>Specific to public transportation, as described in the Greenhouse Gas Emissions Technical Report (Appendix E to the EIR), in Section 1.3.3 (<i>Mobile Source Reductions</i>), consistent with the 2010 California Air Pollution Control Officers Association (CAPCOA) measures, the project is consistent with LUT-5:</p> <ul style="list-style-type: none"><li>o <i>LUT-5 Increased Transit Accessibility – Locating a project near transit will facilitate the use of transit by people traveling to or from the project site. The use of transit results in a mode shift and therefore reduced vehicle miles traveled (VMT). The Project site is located adjacent to San Diego Metropolitan Transit System Line 20, with a stop on both sides of Carmel Mountain Road at the intersection of Carmel Mountain Road and Peñasquitos Drive, within approximately 0.5 mile of the center of the Project site.</i></li></ul> <p>Also, as shown in Section 5.6, project greenhouse gas emissions would be reduced compared to those associated with development of the site under the existing community plan designation. As such, the combination of locational and design factors results in CAP compliance. As evaluated in EIR Section 5.6.2.2, the modeled project emissions were compared with those that could occur under development of the project with housing allowed under existing single-family residential zoning, as well as emissions from regrading and reestablishment of golf course uses. The proposed project was found to result in lower emissions than the existing</p>
--	--

## COMMENTS

## RESPONSES

	<p>SI3A-14 (cont.) zoning and existing land use designation scenarios, as documented on EIR tables 5.6-6 through 5.6-8.</p> <p>Regarding light rail, there is no legal requirement for all new housing to be sited adjacent to light rail. The site is adjacent to existing public transit (Bus Route 20). Although the Rancho Peñasquitos Community Plan does identify light rail along I-15 as a long-term goal on page 84 “to connect Rancho Peñasquitos to downtown, Mission Valley, and other major activity centers” and suggests that studies should be undertaken to determine feasibility, light rail is not currently proposed for the I-15 corridor in the vicinity of the project in the adopted San Diego Forward Regional Plan (SANDAG’s regional transportation plan).</p> <p>SI3A-15 The 1,160 parking spaces are not all proposed for project residences. As described in the cited section, a number of these spaces are in common areas next to park areas, etc., and would accommodate visitors. The additional 81 cited spaces would be for the affordable housing – one vehicle per apartment. Also, as described in Section 5.1.2.2, consistent with the comment, and consistent with a provision in SDMC 142.0525(c), the project is providing fewer common area parking spaces than the typical 20 percent of total off-street parking spaces required in Rancho Peñasquitos and other similar areas. Please see Section 5.5, <i>Greenhouse Gas Emissions</i>, for discussion of that issue and how the project complies. Please also refer to Section 3.3.1.3 of the EIR for a listing and description of sustainable design features that have been incorporated into the project, many of which are aimed at reducing GHG emissions. Of particular relevance to the discussion of parking and transit, the project would provide:</p>
--	---

## COMMENTS

## RESPONSES

SI3A-15 (cont.)

*Pre-wiring (i.e., cabinets and conduits provided for future wiring) of 3 percent of general community parking spaces is required (a total of 37 spaces for the future installation of EV charging stations, with 50 percent of that number (19 of the 37 spaces) to contain additional necessary equipment to create active vehicle charging stations consistent with the City Climate Action Plan. The 19 fully active EV charging stations would be located throughout the community, including 6 publicly accessible stations to be located on Lot F. In addition, the project would provide EV-ready pre-wiring in all 455 market-rate residential garages (exceeding the requirement by 419 spaces);*

and

*Increased transit accessibility due to improved pedestrian and bicycle access through the project site (near Metropolitan Transit System [MTS] Line 20) and provision of new senior housing adjacent to a SANDAG Transit Oriented District (SANDAG 2015).*

## COMMENTS

## RESPONSES

- SI3A-15  
cont. intent of complying with any green-house gas emissions mandates, not, intend that their residents will be taking advantage of public transportation. Please comment on this?
- 1,160 + 81 parking spaces equals **1,261** potential, additional cars in the Glens neighborhood!
17. 3.3.1.6 "Access / Egress Including Off-site Improvements". Please see the next three items and comment...
- SI3A-16 18. 3.5 "Discretionary Actions" RE: rezoning to RM-1-1, RM-3-7... Many residents of the Glens are concerned that the owners of the property, after obtaining their desired rezoning, might sell the property, or, attempt to push forward themselves with a new development plan which calls for even more dwelling units on this 112 acre parcel. Are the zoning changes proposed on the top of page 4-2 sufficient to prevent this from happening?
- SI3A-17 19. Figure 3-12e "Penasquitos Drive – Janal Way Roundabout Improvements" This proposed roundabout will be placed at an intersection that was not intended for such a design. Additionally, the prevailing traffic coming from the heart of the Glens will be moving at 40 mph. The traffic entering from Janal comes down a very steep hill and is blind corner. Virtually all of the 1,261 cars from the Junipers will enter the roundabout to make a 270 degree turn, to get to the Carmel Mountain / PQ Drive intersection – the only real exit from the Glens. Could you, please, provide the independent traffic engineering analysis that illustrate that these three elements are not creating a death trap?
- SI3A-18 Additionally, this road (PQ Drive) is the ONLY emergency access route to the heart of the Glens, (i.e. the existing community). Is this roundabout consistent with fire and other emergency vehicle access requirements?
- SI3A-19 20. Figure 3-12g "Penasquitos Drive – Cuca Street Intersection Improvements" This traffic signal intersection does not take the proposed "Millennium PQ" project into account. The traffic analysis will have to be redone. More importantly, the proposed traffic signal will impact virtually ALL of the proposed residents of the Glens neighborhoods, and the 5,000+ vehicles that would entail. This traffic signal is very close to the BUSY Carmel Mountain Road / PQ Drive intersection, and, I am concerned about the "accordion effect" it will have on traffic flowing into the intersection. There is no traffic "calming" currently; and, now a roundabout and a traffic signal are being proposed in close proximity to each other, and, in close proximity to the intersection. Also, virtually ALL of the traffic from "Millennium PQ" will have to make a left turn, out of that community.
- SI3A-20 What independent, expert analysis was done, to ensure that the roundabout and the traffic signal do not create a traffic and safety nightmare? A second, roundabout was originally proposed for this intersection. Might this be a better solutions, so close to a busy intersection?
- SI3A-21 Mark Kersey asked me to pose this question, when I met with him early in March... What measures are proposed to improve flow through the, already busy, Carmel Mountain Road /

SI3A-16 **Topical Response - Community Plan Implementation Overlay Zone/Potential for Future Proposals.** Overall, this comment requests information and does not address adequacy or accuracy of the EIR. Completion of environmental review and potential project approval does not restrict an owner from selling their property. In addition to the rezone, the project proposes a Community Plan Implementation Overlay Zone (CPIOZ) to ensure that project changes such as additional units would not be built as a matter of right. As stated in EIR Section 3.5:

*Per SDMC Chapter 13, Article 2, Division 14, Section 132.1401, a CPIOZ B ensures that development proposals are reviewed for consistency with the use and development criteria that have been adopted for specific sites within the RPCP. They therefore require discretionary review under CEQA for what otherwise might proceed as purely ministerial actions under approved zoning.*

In this case and as noted, the community plan amendment includes a CPIOZ, as described in EIR Sections 3.5 and 5.1.2. The proposed CPIOZ is Type B (discretionary review) and contains a single development standard that development shall be developed through the approval of a Planned Development Permit. The CPIOZ development standard is only enacted if the project's PDP is not implemented.

Refer to Figure 3-3, *Proposed Lot Detail and Zoning*, for the entire site, as well as EIR Section 5.1.2, under the heading "Consistency with the Land Development Code (Issue 2)."



## COMMENTS

## RESPONSES

	<p>SI3A-16 (cont.) In addition to those areas rezoned for residential with RM-1-1, RM3-7, the proposed zoning would include open space and park designations for areas using OR-1-1 and OP-1-1, which restricts those areas for future residential development.</p> <p>SI3A-17 Peñasquitos Drive is posted for 35 miles per hour (mph). The comment is correct that the current intersection (a stop from Janal Way with no stop on Peñasquitos Drive) is not currently designed for a roundabout. This would be a mitigation measure. The roundabout has been designed to meet all City design and safety standards and to accommodate both community and emergency vehicles. The roundabout would both calm traffic speeds and improve entry onto/crossing of Peñasquitos Drive from northbound and southbound locations. The design is schematically shown on EIR Figure 3-13e, which shows proposed lanes, fire truck aprons, etc. No additional traffic engineering analysis is required.</p> <p>SI3A-18 Please note that if the project is approved and constructed, the current stretch of Peñasquitos Drive would not be the only emergency access route to the Glens (see Responses to Comments 22 through 25 of this letter, below). The roundabout design is consistent with fire and other emergency vehicle access requirements. As stated in Section 3.3.1.6, "Sight-distance analysis has been completed at both existing intersections and adequate vertical and horizontal sight distance is available (see Figure 3-12d). Project plans restrict landscape placement and height adjacent to intersections to ensure continued sight distance." The roundabout would be constructed to meet City requirements for grade (width), curve, etc. and would accommodate community vehicles as well as emergency vehicles such as fire trucks.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI3A-19 The project Transportation Impact Analysis addressed cumulative projects that were known at the time that the project Notice of Preparation (NOP) of an EIR was issued. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. EIR Section 5.2.2, <i>Potential for Traffic Congestion</i>, takes into consideration the proposed roundabout and signalized intersection along Peñasquitos Drive, and demonstrates that traffic will flow smoothly. The existing signal with Carmel Mountain Road and the proposed roundabout at Janal Way are within appropriate proximity per City design standards.</p> <p>SI3A-20 <b>Topical Response – Intersection Improvements.</b> Both the proposed roundabout and signal will be designed to meet City standards, including elements such as width, grade (slope), line of sight, and requirements for safe travel of pedestrians, cyclists, community vehicles and emergency response vehicles, such as fire trucks. The design for Peñasquitos Drive and Janal Way is schematically shown on EIR Figures 3-12e and f, which shows proposed lanes, fire truck aprons, etc. that support emergency vehicle movement through the roundabout. Because appropriate design standards would be met, safety impacts would be less than significant.</p> <p>EIR Section 5.2 discusses the effect of the proposed project on both area roadway segments and intersections. As shown on EIR Tables 5.2-6, 5.2-8 and 5.2-10, no change to Level of Service (LOS) on area roadway segments is expected. Relative to intersections, as shown on EIR Table 5.2-1, although varying in current amounts of congestion, most intersections evaluated operate at acceptable LOS D or better. One intersection in proximity to the project, the Peñasquitos Drive/Cuca Street, operates at failing LOS E in the AM peak hour, and the project would add more than 2.0 seconds of delay to the intersection, resulting in it operating at LOS F. The</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI3A-20 (cont.) Peñasquitos Drive/Janal Way/Future Project Access intersection currently operates at LOS B/C in the AM/PM peak hours, respectively, but would fall to LOS E in the AM peak hour with project implementation (see Table 5.2-7). Significant direct impacts are identified at both of these intersections and mitigation measures are identified requiring implementation of a signal and roundabout to reduce impacts to a less than significant level.</p> <p>The addition of a roundabout at the intersection of Janal Way and Peñasquitos Drive would provide day-to-day benefits to drivers using this intersection. Currently, Janal Way intersects Peñasquitos Drive with a stop sign on Janal Way before entering Peñasquitos Drive. No stop sign is located on Peñasquitos Drive. As documented in EIR Section 5.2, <i>Transportation/Circulation</i>, the existing level of service for vehicles turning from Janal Way onto Peñasquitos Drive is calculated at LOS C in the morning commute period.</p> <p>The roundabout design at the Peñasquitos Drive/Cuca Street intersection was abandoned in favor of a traffic signal when it was determined that the roundabout would have involved part of the privately owned Hotel Karlan property. The applicant also indicates that this decision was influenced by resident concerns about two roundabouts so close together, as expressed at a community meeting held by the developer.</p> <p>With the roundabout proposed by the project at Janal Way and the signal proposed at Cuca Street, the delay improves to LOS A for all movements at these intersections, both with the project on Opening Day (2020) in the Near-term (see EIR Table 5.2-7) and under Horizon Year (2050) conditions (see Table 5.2-13).</p>
--	---

## COMMENTS

## RESPONSES

SI3A-21 As stated in EIR Section 5.14.4.2, during emergency situations, roundabouts also allow for efficient emergency access and improve response times by minimizing intersection related delays. They also reduce demands on response resources by working effectively without assignment of emergency personnel to monitor the roundabout during emergency/evacuation events, allowing for those personnel to be sent where needed most. The Carmel Mountain Road and Peñasquitos Drive intersection operates at LOS C (an acceptable LOS) during AM and PM peak hours under current conditions (see EIR Table 5.2-1). This condition continues for Opening Day (2020) Plus Project (Near-term), and under Horizon Year (2050) Plus Project conditions, as shown on EIR Tables 5.2-5, 5.2-7 and 5.2-9. These latter conditions also include Cresta Bella as an existing condition, as well as the proposed project and cumulative projects that were known at the time of the project NOP (i.e., Pacific Village, The Preserve at Torrey Highlands, and Merge 56). Please refer to the Response to Comment 19 above.



## COMMENTS

## RESPONSES

SI3A-21  
cont.

PQ Drive intersection, with the addition of all the residential development at: Cresta Bella, Pacific Villages, Junipers, and, Millennium PQ?

SI3A-22

21. **!!!** Figure 3-13 "Andorra Way Emergency Access Road." It is my understanding, that this road is currently designated as an emergency fire vehicle access route, into the community, **ONLY**. To make this road an emergency ingress and egress (for emergency evacuation), it would have to be widened, substantially, and, the house currently occupying "LOT 1 MAP NO. 11829" would have to **REMOVED**, so that road could be sufficiently widened.

SI3A-23

Additionally, we have contracted two, independent fire safety experts to comment on the "Fire Protection Plan" provided for the Junipers. Both expert reviews found the FPP to be **COMPLETELY INADEQUATE, NON-COMPLIANT & RIDDLED WITH FALACIES!** Just one comment from these experts, in reference to Figure 3-13: "*The FPP is promulgating restricted access points (locked gates/barricades/bollards) that are not used on a daily basis by future residents. Fire-related human behavior research clearly indicates that if a person does not use an ingress or egress point on a daily basis, they will not use it under the stress of an emergency evacuation.*" This also applies to the asinine assumption that residents of the "Junipers" will **exit** through the proposed "Carmel Mountain Road Frontage and Off-Site Conceptual Improvements" (Figure 3-12c) ingress only, to the Junipers, which is to be developed on Carmel Mountain Road. During an emergency, this traffic would, literally, "T-bone" into the flow of emergency vehicle traffic exiting the Glens, and create a complete traffic nightmare. (please also see Appendix K-4, Figure 1-B & Figure 7 of the Dudek "Wildlife Fire Evacuation Plan". Appendix K-5 has similar information)

SI3A-24

The emergency exit assumptions of the Junipers Fire Protection Plan, which are mirrored in this EIR, are deeply flawed. The Glens community is "landlocked". By the I-15 on the East. The Black Mountain Open Space to the West. And blocked, from RB to the North. The Carmel Mountain / PQ Drive intersection is the only, viable exit during an emergency evacuation. During the Cedar Fires and Witch Creek Fires, many residents of the Glens experienced **MULTI-HOUR DELAYS** evacuating from the community. And, this was BEFORE the additional dwelling units added to the community by: Cresta Bella, Penasquitos Villages, The Junipers, and, Millennium PQ. The proposed emergency evacuation plan proposed is completely inadequate, and, requires substantial revision.

SI3A-25

Finally, the Glens is bordered by hundreds of acres of rugged Open Space (Black Mountain) and considered a "non-compliant" fire safety zone, and, an "Official Very High Fire Hazard Severity Zone" on the City of San Diego Fire-Rescue Department maps.

SI3A-26

Please advise on the best plan forward on this incredibly important safety issue for the residents of the Glens?

SI3A-27

22. 5.2-11 (Table 5.2-4 Project Trip Generation) 4 trips per dwelling unit seems very low. Most residents age 55 to 65 will be working, and, arguably will make multiple trips per day. It seems these trip assumptions are flawed. Please comment?

SI3A-22 The Andorra Way emergency access route currently can be used by emergency vehicles, but is not open to community vehicles for travel during emergencies. The existing condition description was developed in conjunction with information provided by the City Fire Department, which characterized the bollards as being "cemented in" and "inoperable." As described in Section 3.3.1.6 of the EIR, and shown on Figure 3-13:

*Off-site emergency access/egress between Andorra Way and Corte Raposo would be improved by the project to remove inoperable bollards, install an automatic gate to SDFRD requirements, resurface the connection to carry the imposed load of fire apparatus (75,000 pounds), and provide ongoing vegetation maintenance and gate maintenance funding, providing a usable emergency link between the two streets. The project would also provide for landscape and gate maintenance.*

## COMMENTS

## RESPONSES

	<p>SI3A-22 (cont.) This plan has been reviewed by the City Fire Marshal and approved as appropriate and feasible. No homes would have to be removed in order to reinforce the 20-foot-wide emergency route that could accommodate community vehicles as well as emergency response personnel.</p> <p>SI3A-23 In the experience of technical fire professionals who authored the Fire Protection Plan and the Wildland Fire Evacuation Plan, as well as City fire managers and Fire-Rescue Department personnel, residents under evacuation orders will follow the directions of the emergency management personnel on the scene throughout the evacuation process. This is also true of the Carmel Mountain Road access point that can work as an egress during an evacuation event. Law enforcement officers would control intersections to facilitate traffic flow out onto Carmel Mountain Road and across the median. Drivers would be expected to follow those orders. Please refer to the Evacuation Plan introduction "Quick Reference – Wildland Fire Preparedness" where readers are directed to "follow directions provided by credible sources" and where it is noted that "Directions of travel and use of routes ... will be controlled by Emergency Personnel in the event of a wildfire..." Also see Evacuation Plan Sections 1.3, 2, 3.3.3, 4, 4.1.1, 4.2, 7, Figures 1B and 8, and Table 1.</p> <p>SI3A-24 The comment is correct that the current sole egress point ultimately is through the Carmel Mountain Road/Peñasquitos Drive intersection. The comment is also correct regarding topographic and state route surroundings. These are the existing conditions. Refer to Response to Comment 1 from Derbique (Letter SI4), for detailed information regarding proposed emergency evacuation and access improvements. Regarding the Millennium PQ development, please refer to the response to Comment 5 from DeLano (Letter SI1).</p>
--	---

	<p>SI3A-25 <b>Topical Response - Black Mountain Open Space VHFHSZ.</b> The comment is correct that the Black Mountain Open Space and portions of the project site are considered to be within a Very High Fire Hazard Severity Zone (VHFHSZ). This is referenced in the hazard and evacuation discussions in EIR Section 5.14, <i>Health and Safety</i>. As stated in EIR Section 5.14.1.1, this means that it is an area identified by CAL FIRE as having the factors (fuel, slope, and fire weather) to result in severe risk of fire hazard. This does not indicate that development cannot occur within the VHFHSZ, let alone within its vicinity. Instead, it means that development must build to a greater level of ignition resistance and include additional fire protection features. The project includes these additional features and improves evacuation scenarios, regardless of the direction from which fire comes, because it provides additional evacuation routes. Please refer to EIR Section 5.14, <i>Health and Safety</i>.</p> <p>The presence of the VHFHSZ is the reason that the project Fire Protection Plan was prepared. The Wildland Fire Evacuation Plan was additionally prepared as a tool to help residents be aware of wildfire evacuations and their potential evacuation routes.</p> <p>SI3A-26 Overall, this comment requests information and does not address the adequacy or accuracy of the EIR, which adequately addresses health and safety issues in Section 5.14. For information on emergency evacuation, however, please refer to the Response to Comment 24, above, and the Response to Comment 1 from Derbique (Letter SI4). In addition to commenting and receiving responses to comments on the EIR, there will be opportunities to participate in hearings held on the project during consideration of the project for approval or denial by City decision makers.</p>
--	---

## COMMENTS

## RESPONSES

	SI3A-27 Please refer to the Response to Comment 2 from DeLano & DeLano (Letter SI1) for an explanation of the trip generation rate used for the project Transportation Impact Analysis.
--	---



## COMMENTS

## RESPONSES

<p>SI3A-28</p> <p>23. 5.2-6 (Table 5.2-6 Existing Plus Project Street Segment Operations) I know several of the street “segments” referenced very well, from personal experience, having driven them for years, at various times of the day. The level of traffic, depending on time of day, can vary substantially! i.e. these streets can be fairly “quiet” for the majority of the day; yet, become very congested during rush hour. The fact that they are designated with no worse than a “C” rating is concerning. Item 2, at 46,156 vehicles, is likely a “D” or even “F” at rush hour, yet, this does not seem to be captured in these LOS measurements.</p> <p>Please comment?</p>	<p>SI3A-28</p> <p>In addition to roadway capacity based on number of lanes and other segment characteristics – traffic analyses also evaluate intersection function. Intersection function reflects directly on how well the adjacent segments function, and is focused on the worst-case peak hours. Where an intersection is failing, mitigation measures are required that will address traffic flow through and between them. In this case, intersection upgrades are proposed at both the Peñasquitos Drive/Janal Way/Future Project Access, as well as Peñasquitos Drive/Cuca Street. As demonstrated on EIR Tables 5.2.12 and 5.2-13 addressing Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions, the mitigation improvements would improve conditions from LOS E/D and F/D in the AM/PM peak hours, respectively to LOS A/A (at both locations, with implementation of the proposed project and the cumulative projects known at the time of the project NOP. The adjacent roadway segments on Peñasquitos Drive also continue to operate at LOS C in the existing condition, in Opening Day (2020) Plus Project, and Horizon Year (2050) Plus Project conditions, as shown on Tables 5.2-2, 5.2-6 and 5.2-8.</p>
<p>SI3A-29</p> <p>Additionally, based on above observation, I am deeply concerned about the LOS “C”, “D” and “E” ratings of Table 5.2-7. What does this say about the traffic levels we can expect after The Junipers is built? (Millennium PQ?) Will this become a significant safety concern as well?</p>	
<p>SI19A-30</p> <p>24. 5.6-8 (Table 5.6-1 City General Plan Implementation Strategies) How can the “Junipers” plan be consistent with AB 32 to reduce GHG levels below 1990 levels with the addition of 1,261 new parking spots (i.e. cars)?</p>	
<p>SI3A-31</p> <p>25. In conclusion, in the ERA of Covid 19, and <u>state-mandated</u> social distancing, how can the City of San Diego justify increasing density of population? I, very recently, received a report by the former Head of Epidemiology at Stanford’s Medical School that speculates that Covid 19 could eradicate 10-20% of the world’s population! (Again, THE former Head of Epidemiology at Stanford’s Medical School!!!) It seems the prudent thing to do, <u>RIGHT NOW</u>, in the interest of public safety, is to suspend all plans for construction of dwelling units <u>WHICH WOULD INCREASE POPULATION DENSITY</u>, until a comprehensive State of California plan for population density increase has been established. Please respond how allowing this, or, any other project that <u>increases current population density</u>, is in the best interest of <u>current public safety</u>?</p>	<p>SI3A-29</p> <p>EIR Table 5.2-7 reflects estimated traffic conditions at the project’s modeled Opening Day in 2020 (Near-term). This includes the project traffic, as well as the cumulative projects known at the time of issuance of the Project NOP. As shown, all intersections would function at acceptable LOS levels with the mitigated condition at the Peñasquitos Drive/Cuca Street intersection, which would be mitigated to LOS A through mitigation measure TRA-1, and the mitigated condition at Peñasquitos Drive/Janal Way/Future Project Access which would be mitigated to LOS A through mitigation measure TRA-2. Both of these actions would improve conditions to levels exceeding current conditions.</p>
<p>Sincerely and respectfully!</p> <p><b>Stephan Haight</b>  <b>14624 Wye Street</b>  <b>(m) 619-972-6880</b>  <b>A 20-year resident of the Glens of PQ, and, a deeply-concerned citizen of San Diego</b></p>	

## COMMENTS

## RESPONSES

	<p>SI3A-29 (cont.) All mitigation intersections and travel lane upgrades (e.g., bike lane striping and the project's entry-only lane on Carmel Mountain Road will be designed to City standards. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information regarding new project applications that postdated the NOP for the proposed project.</p> <p>SI3A-30 Please refer to Response to Comment 14, above, regarding general elements that are incorporated into greenhouse gas emissions planning beyond parking allocations as well as AB 32 compliance through the City's CAP.</p> <p>SI3A-31 Comments noted. Overall, these comments request information. Development of City planning documents is a separate planning process from the CEQA review for the project EIR. The comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require response.</p>
--	---

## COMMENTS

## RESPONSES

**From:** [stephanhaight@yahoo.com](mailto:stephanhaight@yahoo.com)  
**To:** [DSD\\_EAS](#)  
**Subject:** [EXTERNAL] RE: Draft EIR Comment - Project Name: The Junipers / Project No. 586670  
**Date:** Monday, April 06, 2020 2:33:53 PM

Dear Ms. Osborn:

Please consider one more question (#26), from me:

26. RE: Table 5.2-6 "Existing Plus Project Street Segment Operations" (page 5.2-15) I am not sure what the intent of this table and calculations is. To demonstrate the prevailing traffic levels, I presume. (?) As a 20-year resident of this community I have observed that a significant traffic "segment" is Rancho Carmel Drive to the I-15 SB Ramps (i.e. the traffic that comes across the freeway bridge and then turns South onto the I-15). However, the measurements for this segment are not included in this table. Why not?

Again, that particular segment represents some of the most significant traffic, and the ensuing traffic build-up onto the "feeder" streets, I am aware of. Why was it left out of the table?

Is it not reasonable that those performing this traffic analysis identify the most significant traffic "segments" and analyze the effects of a proposed development on those? As this segment was not considered, it bears to consider what other critical segments may have been overlooked as well? And, perhaps, the qualifications of those performing the analysis?

I do not intend to be overly speculative, nor, confrontational. I am merely confused about something that I would expect to see in this particular table and don't.

Regards.

**Stephan Haight**  
**14624 Wye Street**  
**(m) 619-972-6880**

**From:** [stephanhaight@yahoo.com](mailto:stephanhaight@yahoo.com) <[stephanhaight@yahoo.com](mailto:stephanhaight@yahoo.com)>  
**Sent:** Saturday, April 4, 2020 8:53 PM  
**To:** DSD EAS <[DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)>  
**Subject:** Draft EIR Comment - Project Name: The Junipers / Project No. 586670

Dear Ms. Osborn:

In review of the subject draft EIR, please acknowledge receipt of, consider, and, respond to the

SI3B-1 The purpose of Table 5.3-6 is to demonstrate the extent to which traffic contributing to specific roadway segments by the proposed project in the vicinity of the project could affect Level of Service (LOS). As shown on the table, there is no reduction in LOS expected under existing plus project conditions. All critical road segments related to the proposed project were analyzed.

With respect to the Carmel Mountain Road overpass, function on this road segment is controlled by the two intersections at either end (Intersections 2 and 3, addressing the Carmel Mountain Road and I-15 northbound and southbound ramps, respectively, in the project traffic analysis). As shown on Tables 5.2-5, 5.2-7 and 5.2-9, these intersections would be expected to operate at acceptable LOS in all scenarios. As such, this road segment does as well.

As noted in the introduction to the comment letter, only Comment 1 is new. The remainder of the letter consists of the April 4 submittal, which is fully responded to immediately above in this file. (See responses to comments for your letter SI3A.)

## COMMENTS

## RESPONSES

following 25 items:

(If nothing else, please see item 21 !!! )

1. This project/plan calls for a change to the community plan. My understanding is that a community plan amendment must demonstrate a benefit to the community. How can removing an "open space" which offers a clear recreational benefit to the entire community of San Diego, plus, contributes as one of the defining characteristics of the local community, as the oldest development in all of RPQ, and, finally, brings a significant element of prestige to the local community, and, instead, placing a bunch of additional housing on that property, create any sort of benefit? If the owners of the golf course cannot turn a profit as a golf course, should they not simply sell it to somebody who is willing to work within the intent of the community plan?

Please demonstrate what benefit this amendment to the community plan would bring to the community of RPQ – for whom it was intended? Why would the existing community plan not be adhered to? What is the purpose of having a community plan, or, any other form of guideline of law, if the are not adhered to when perceived to be inconvenient by someone with a potential source of tax revenue? (Please also see 5.1-33 and 34 "RP Community Plan" particularly item 6)

2. The CUP governing both the Junipers and Millennium PQ properties stipulate that the owners of the tennis courts and rec facilities make these available to the local community for use. I believe this is captured in the community plan as well. This (community rec) section of the properties was split in half, between "Junipers" and hotel owners, when the tennis courts property was acquired by the owner of the Junipers in 2018. This sale may have been, technically, illegal, as it may have been a violation of the CUP governing their "ownership". Can you comment on this, please? (The golf course property, itself, was split away from the hotel in 2006). The Junipers plan now calls for the primary entrance and the sole, standard exit from the community to pass over these tennis courts.

What alternate recreational benefit is being offered to the community of RPQ, to compensate for the removal of these rec facilities from local public use?

3. RE: 8.4.1... Why were no project alternative considered? The golf course property is permitted for exactly that purpose. And the owners deemed it to be not profitable due to increasing water costs. Why was a less water-intensive recreational use not considered for the property, to maintain maximum compliance with zoning, and intent for the property?
4. S.1.1 Has the impact of the (rain water) flows that are "ultimately conveyed to (year round) Penasquitos Creek" been properly considered? As Penasquitos Creek is one of the few year-round watersheds in San Diego county, and vital to local wildlife.
5. S.1.2 Item 1 City (of San Diego) housing supply "needs" are based on what? The greater San Diego area is bordered by the Pacific (to the West), Mexico (to the South), Mountains and



## COMMENTS

## RESPONSES

Desert (to the East), and, Camp Pendelton (to the North). Additionally, much of San Diego is hill country – which is inherently-challenging for development. Additionally, the country is considered semi-arid desert; and, water supplies (among others) are already severely limited. Scarcity of resource limits availability, and, increases cost. This does not constitute “need”. Please explain the drivers behind this “need”?

6. S.1.2 Item 4... How does this proposed development effectively and reasonable tie into public transit? Please explain this?
7. S.1.2 Item 6... “Reconstruct the on-site drainage ...resulting in a gain in native habitat;” How can replacing 112 acres of grassland and trees with housing and roads result in a “gain in native habitat”? I contend this is a blatant misrepresentation of intent. I would ask that the city request an independent audit of the impact to “native habitat” by this proposed development, by certified ecological experts, before granting any approvals. Is this possible?
8. (follow up on 7, above). Page S-12 (Table S-1... “Biology”) The impact of all this development, replacing 112 acres of grass and trees, as having a “less than significant” impact seems absurd. This statement should be corroborated by and INDEPENDENT and INDEPENDANTLY FUNDED environmental engineering group. Please confirm if and how this would be possible to accomplish? Is a lawsuit our only avenue to adequately protect the environment?
9. S.1.2 Item 8... “Improve emergency access and enhance egress routes...” I contend this is a blatant falsehood and that this proposed development, instead, represents an unacceptable decrease in public emergency evacuation (and access) safety. Please refer to 21, below (!!!) and comment?
10. S.5.2 “No Project/Development Per Community Plan”... This section appears to be written with incredible bias, insinuating that NOT developing the property as proposed by the Junipers constitutes a lost opportunity. I contend that there are a myriad OTHER POTENTIAL USES for this property, that are in keeping with the community plan, that would NOT propose a significant increase in risk to public safety (traffic & fire evacuation) as the “Junipers” proposal does. Redeveloping as a low-water use golf facility, or, as a year-round soccer field complex (with mixed grass and artificial turf) are just two solutions that seem MUCH more beneficial to the local communities, AND, the long-term benefits of San Diego as a whole. Why were such, alternate, and very viable alternatives not considered?
11. Page S-11 (Table S-1 “Summary of Significant Impacts and Mitigation”) Both, TRA-1 and TRA-2 are found to have a “less than significant” significance, after mitigation. This insinuates that all of the traffic coming out of the Junipers, 99% of which will have to turn left through the new roundabout; and, all of the traffic coming out of the proposed Millennium PQ apartments, 99% of which will have to turn left at the proposed 4-way traffic light, will have a “less than significant” impact to the current, prevailing traffic, which flows at 40 mph as it approaches the Carmel Mountain / Pensasquitos Drive intersection. This statement is ludicrous! And, a significant safety concern to the existing community residents. Could you, please, provide insight on the expert, real-world, analysis that substantiates that the traffic (&

## COMMENTS

## RESPONSES

safety) impact would be “less than significant”?

12. 2.4.1 “City of San Diego General Plan” Given the Historic and transformational nature of the Novel Corona Virus, and COVID 19, should the SDGP be re-evaluated?
13. 2.4.2 “RP Community Plan” This section illustrates the reason and the importance of the community plan, and that it clearly calls for this property to be a golf course / open space (among other things). What is the rationale behind calling out the importance of this document, and, the clarity of its definition for this particular piece of land, and NOT demanding that a developer do everything possible to try and comply? If this is not the case, what is purpose of having a community plan, with such clear definitions of purpose?
14. 2.4.4 “Zoning”. The “underlying” zone for this (golf course) property is governed by CUP 5206, originally issued in 1962. It was never intended to be used for RS-1-14, as the CUP clearly identifies it as intended as a golf course, and, attempting to classify the property as being zoned for residential is false. Please advise our legal course of action to make sure this issue is not “glossed over”?
15. 2.4.6 “Regional Air Quality” To be compliant with air quality & greenhouse gas mandates (referenced elsewhere) this project should have CLEAR AND CONVENIENT access to functional public transport. Does it? Additionally, the availability of parking spaces within the community should be severely limited, to force residents to be dependent on public forms of transport, to help comply with California’s long-term greenhouse gas reduction mandates. Does it do this?
16. 3.3 “Project Characteristics” RE: “The California Legislature has declared ... authorized specialty housing for citizens 55 years of age, and over.” The California Legislator has also issues mandates for greenhouse gas reductions; and, placing new developments near public transport access such as light rail. Are there plans to run a light rail system to within walking distance of the Junipers development? If not, is this not a violation of the mandate that this section is referencing/using as justification for development?  
  
Additionally, RE: 3.3.1.4 “Project Parking” ... “1,160 vehicle parking spaces for the 455 for sale units” plus 81 more vehicle parking spaces, make it clear that the developers have no intent of complying with any green-house gas emissions mandates, not, intend that their residents will be taking advantage of public transportation. Please comment on this?  
  
1,160 + 81 parking spaces equals 1,261 potential, additional cars in the Glens neighborhood!
17. 3.3.1.6 “Access / Egress Including Off-site Improvements”. Please see the next three items and comment...
18. 3.5 “Discretionary Actions” RE: rezoning to RM-1-1, RM-3-7... Many residents of the Glens are concerned that the owners of the property, after obtaining their desired rezoning, might sell the property, or, attempt to push forward themselves with a new development plan

## COMMENTS

## RESPONSES

which calls for even more dwelling units on this 112 acre parcel. Are the zoning changes proposed on the top of page 4-2 sufficient to prevent this from happening?

19. Figure 3-12e "Penasquitos Drive – Janal Way Roundabout Improvements" This proposed roundabout will be placed at an intersection that was not intended for such a design. Additionally, the prevailing traffic coming from the heart of the Glens will be moving at 40 mph. The traffic entering from Janal comes down a very steep hill and is blind corner. Virtually all of the 1,261 cars from the Junipers will enter the roundabout to make a 270 degree turn, to get to the Carmel Mountain / PQ Drive intersection – the only real exit from the Glens. Could you, please, provide the independent traffic engineering analysis that illustrate that these three elements are not creating a death trap?

Additionally, this road (PQ Drive) is the ONLY emergency access route to the heart of the Glens, (i.e. the existing community). Is this roundabout consistent with fire and other emergency vehicle access requirements?

20. Figure 3-12g "Penasquitos Drive – Cuca Street Intersection Improvements" This traffic signal intersection does not take the proposed "Millennium PQ" project into account. The traffic analysis will have to be redone. More importantly, the proposed traffic signal will impact virtually ALL of the proposed residents of the Glens neighborhoods, and the 5,000+ vehicles that would entail. This traffic signal is very close to the BUSY Carmel Mountain Road / PQ Drive intersection, and, I am concerned about the "accordion effect" it will have on traffic flowing into the intersection. There is no traffic "calming" currently; and, now a roundabout and a traffic signal are being proposed in close proximity to each other, and, in close proximity to the intersection. Also, virtually ALL of the traffic from "Millennium PQ" will have to make a left turn, out of that community.

What independent, expert analysis was done, to ensure that the roundabout and the traffic signal do not create a traffic and safety nightmare? A second, roundabout was originally proposed for this intersection. Might this be a better solutions, so close to a busy intersection?

Mark Kersey asked me to pose this question, when I met with him early in March... What measures are proposed to improve flow through the, already busy, Carmel Mountain Road / PQ Drive intersection, with the addition of all the residential development at: Cresta Bella, Pacific Villages, Junipers, and, Millennium PQ?

21. !!! Figure 3-13 "Andorra Way Emergency Access Road." It is my understanding, that this road is currently designated as an emergency fire vehicle access route, into the community, ONLY. To make this road an emergency ingress and egress (for emergency evacuation), it would have to be widened, substantially, and, the house currently occupying "LOT 1 MAP NO. 11829" would have to REMOVED, so that road could be sufficiently widened.

Additionally, we have contracted two, independent fire safety experts to comment on the "Fire Protection Plan" provided for the Junipers. Both expert reviews found the FPP to be

**COMPLETELY INADEQUATE, NON-COMPLIANT & RIDDLED WITH FALACIES!** Just one comment from these experts, in reference to Figure 3-13: *"The FPP is promulgating restricted access points (locked gates/barricades/bollards) that are not used on a daily basis by future residents. Fire-related human behavior research clearly indicates that if a person does not use an ingress or egress point on a daily basis, they will not use it under the stress of an emergency evacuation."* This also applies to the asinine assumption that residents of the "Junipers" will **exit** through the proposed "Carmel Mountain Road Frontage and Off-Site Conceptual Improvements" (Figure 3-12c) ingress only, to the Junipers, which is to be developed on Carmel Mountain Road. During an emergency, this traffic would, literally, "T-bone" into the flow of emergency vehicle traffic exiting the Glens, and create a complete traffic nightmare. (please also see Appendix K-4, Figure 1-B & Figure 7 of the Dudek "Wildlife Fire Evacuation Plan". Appendix K-5 has similar information)

The emergency exit assumptions of the Junipers Fire Protection Plan, which are mirrored in this EIR, are deeply flawed. The Glens community is "landlocked". By the I-15 on the East. The Black Mountain Open Space to the West. And blocked, from RB to the North. The Carmel Mountain / PQ Drive intersection is the only, viable exit during an emergency evacuation. During the Cedar Fires and Witch Creek Fires, many residents of the Glens experienced **MULTI-HOUR DELAYS** evacuating from the community. And, this was BEFORE the additional dwelling units added to the community by: Cresta Bella, Penasquitos Villages, The Junipers, and, Millennium PQ. The proposed emergency evacuation plan proposed is completely inadequate, and, requires substantial revision.

Finally, the Glens is bordered by hundreds of acres of rugged Open Space (Black Mountain) and considered a "non-compliant" fire safety zone, and, an "Official Very High Fire Hazard Severity Zone" on the City of San Diego Fire-Rescue Department maps.

Please advise on the best plan forward on this incredibly important safety issue for the residents of the Glens?

22. 5.2-11 (Table 5.2-4 Project Trip Generation) 4 trips per dwelling unit seems very low. Most residents age 55 to 65 will be working, and, arguably will make multiple trips per day. It seems these trip assumptions are flawed. Please comment?

23. 5.2-6 (Table 5.2-6 Existing Plus Project Street Segment Operations) I know several of the street "segments" referenced very well, from personal experience, having driven them for years, at various times of the day. The level of traffic, depending on time of day, can vary substantially! i.e. these streets can be fairly "quiet" for the majority of the day; yet, become very congested during rush hour. The fact that they are designated with no worse than a "C" rating is concerning. Item 2, at 46,156 vehicles, is likely a "D" or even "F" at rush hour, yet, this does not seem to be captured in these LOS measurements.

Please comment?

Additionally, based on above observation, I am deeply concerned about the LOS "C", "D" and



## COMMENTS

## RESPONSES

“E” ratings of Table 5.2-7. What does this say about the traffic levels we can expect after The Junipers is built? (Millennium PQ?) Will this become a significant safety concern as well?

24. 5.6-8 (Table 5.6-1 City General Plan Implementation Strategies) How can the “Junipers” plan be consistent with AB 32 to reduce GHG levels below 1990 levels with the addition of 1,261 new parking spots (i.e. cars)?

25. In conclusion, in the ERA of Covid 19, and state-mandated social distancing, how can the City of San Diego justify increasing density of population? I, very recently, received a report by the former Head of Epidemiology at Stanford’s Medical School that speculates that Covid 19 could eradicate 10-20% of the world’s population! (Again, THE former Head of Epidemiology at Stanford’s Medical School!!!) It seems the prudent thing to do, **RIGHT NOW**, in the interest of public safety, is to suspend all plans for construction of dwelling units **WHICH WOULD INCREASE POPULATION DENSITY**, until a comprehensive State of California plan for population density increase has been established. Please respond how allowing this, or, any other project that increases current population density, is in the best interest of **current public safety**?

Sincerely and respectfully!

Stephan Haight  
14624 Wye Street  
(m) 619-972-6880

A 20-year resident of the Glens of PQ, and, a deeply-concerned citizen of San Diego

## COMMENTS

## RESPONSES

**From:** [Todd Derbique](#)  
**To:** [DSD\\_EAS](#)  
**Subject:** [EXTERNAL] Draft EIR Comment - Project Name: The Junipers / Project No. 586670  
**Date:** Sunday, April 05, 2020 11:30:53 PM

Dear Ms. Osborn,

My family has lived in Rancho Penasquitos for 30 years, with the last 27 being in the Glens community. I write today very concerned with what is happening to our community, and take issue with much of what is in the EIR report. It is a very long report so I have listed only a few items of utmost concern.

SI4-1

1. Evacuation plans for the community. The Junipers in combination with all the other developments, proposed and under construction (Cresta Bella, Pacific Villages, Junipers, and, Millennium PQ), will add over 1400 units to a community with approximately 1800. This is nearly doubling our community size, with nearly all the new units near the only entrance on Carmel Mtn. Rd and Penaquitos Drive. I've been through several evacuations because of fires and it took hours to evacuate. The Glens is bordered by hundreds of acres of rugged Open Space (Black Mountain) and considered a "non-compliant" fire safety zone, and, an "Official Very High Fire Hazard Severity Zone" on the City of San Diego Fire-Rescue Department maps. The evacuation plan seems to be a fallacy. How do you expect nearly twice as many people to evacuate in the same or less time than the current evacuation plan for the community?

SI4-2

2. Traffic. Table 5.2.7 indicates that the Penasquitos Dr./Cuca St. intersection will have a LOS of F. Penasquitos Dr./Janal Way will have a LOS of E. This is completely unacceptable as this is the only way in or out of our community. We would be stuck in a traffic jam just trying to get to the traffic jam already on I-15. How does the city plan to mitigate this very poor level of service?

SI4-3

3. This project/plan calls for a change to the community plan. The golf course was meant to be an open space as a buffer to the community from the freeway. My understanding is that a community plan amendment must demonstrate a benefit to the community. How can removing an open space which offers a clear recreational benefit to the entire community of San Diego, plus, contributes as one of the defining characteristics of the local community, create any sort of benefit by replacing it with a bunch of homes? If the owners of the golf course cannot turn a profit as a golf course, should they not simply sell it to somebody who is willing to work within the intent of the community plan? Please explain how there were no other plans explored to maintain this land as open space per the original community plan. It appears the city is willing to simply change the existing community plan when it suits its needs. What alternate recreational benefit is being offered to the community of PQ to compensate for the removal of these rec facilities from local public use?

SI4-4

4. 3.5 "Discretionary Actions" RE: rezoning to RM-1-1, RM-3-7... Myself along with many residents of the Glens are concerned that the owners of the property, after obtaining their desired rezoning, might sell the property, or, attempt to push forward themselves with a new development plan which calls for even more dwelling units on this 112 acre parcel. Are the zoning changes proposed on the top of page 4-2 sufficient to prevent this from happening?

SI4-5

5. 3.3 "Project Characteristics" RE: "The California Legislature has declared ... authorized specialty housing for citizens 55 years of age, and over." The California Legislator has also issues mandates for greenhouse gas reductions; and, placing new developments near public transport access such as light rail. Are there plans to run a light rail system to within walking distance of the Junipers development? If not, is this not a violation of the mandate that this section is referencing/using as justification for development? I'm only aware of a bus route serving the area.

SI4-6

In closing I cannot understand how the Junipers development will enhance or improve the PQ

**SI4-1 Topical Response – Wildfire Evacuation Planning.** The EIR for the project addressed cumulative projects that were known at the time that the project Notice of Preparation was issued. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.

CEQA analyses address the amount of change from an existing condition, and whether a project would degrade environmental conditions. While the project and other proposed developments would add traffic to local roadways, the proposed increase in availability and quality of evacuation routes is anticipated to more than offset the increase in traffic and to reduce local evacuation times compared to the existing condition. As noted in the comment, and described in the Wildland Fire Evacuation Plan in Appendix K4 and in EIR Section 5.14.4.2, under existing conditions, an evacuation of the Glens community – with all vehicles traveling along Peñasquitos Drive and Carmel Mountain Road for substantial portions of those roads – is modeled to take up to 8.3 hours following notification to evacuate. Although the gated fire access connecting Andorra Way and Corte Raposo in the northeast portion of the Glens is considered currently available to fire department use, it is not considered reliable during an evacuation. While Peñasquitos Drive would continue to be the primary route, provision of a new route southerly through the project from the vicinity of Janal Way would provide direct access would provide direct

## COMMENTS

## RESPONSES

	<p>SI4-1 (cont.) access from the project site to Carmel Mountain Road via proposed Private Driveways A and V. As stated in EIR Section 5.14.4.2:</p> <p><i>This additional egress would be available to residents of the Glens community as well as the project during an emergency and would include a mountable median with bollards, enabling law enforcement-controlled egress to the east or west along Carmel Mountain Road. This additional emergency egress route would provide an important alternative should Peñasquitos Drive become congested or impassible during an emergency. This egress route would effectively reduce the time needed to evacuate the Glens community by 30 to 35 percent (Dudek 2019a).</i></p> <p>As stated in Chapter 3.0 of the EIR in Section 3.3.1.6:</p> <p><i>The project also would improve and retain an existing fire/emergency access/egress connection from Del Diablo Street to the northwestern portion of the project site, approximately 100 feet east of the intersection of Del Diablo Street and Satanas Street between parcels 313-261-12 and -13. This connection is currently gated, and has an existing curb cut. The project emergency-only road would connect the project to Del Diablo Street within the existing Glens community. Off-site emergency access/egress between Andorra Way and Corte Raposo would be improved by the project to remove inoperable bollards, install an automatic gate to SDFRD requirements, resurface the connection to carry the imposed load of fire apparatus (75,000 pounds), and provide ongoing vegetation maintenance and gate maintenance funding, providing a usable emergency link between the two streets. The project would also provide for landscape and gate maintenance. The planned improvements for Andorra Way are shown on Figure 3-13, Andorra Way Emergency Access Road.</i></p>
--	--

## COMMENTS

## RESPONSES

SI4-1 (cont.)

*At the Carmel Mountain Road access to the project, an automatic gate also would be installed. Both gates would be opened by emergency responders only. All primary and secondary entry points described above would be constructed to accommodate emergency vehicle access.*

In addition to the enhancement of the egress route that connects Andorra Way to Corte Raposo, which is a route currently inaccessible to community vehicles. Project improvements would provide an evacuation route in the northerly portion of the Glens community where no egress currently exists. Egress from the project site via this enhanced route would involve travel along Del Diablo Way, Andorra Way, Corte Raposo, Paseo Montanoso, and Camino Del Norte. This would allow for an evacuation route that would avoid the Peñasquitos Drive to Carmel Mountain Road route. Together, these improvements combine to create a very different condition than existing today, and would allow the neighborhood to evacuate more efficiently even with additional homes. All of the emergency access/egress improvements proposed by the project are conditions of the project and would be implemented during project construction.

The Evacuation Plan includes extensive calculations of evacuation times both with and without the project. As explained in the Evacuation Plan in + 4.2, Roadway Capacities and Evacuation Time Estimates, although each evacuation route would normally be able to carry up to 1,000 vehicles per hour per lane of vehicle traffic, the Glens residential streets were rated as a conservative 500 vehicles per hour (vph) during an evacuation. They can likely move considerably more traffic than this, but as part of a cautious approach, 500 vph was recommended by the developer's traffic engineers to be appropriate. The use of 500 vehicles per hour evacuation rate



## COMMENTS

## RESPONSES

	<p>SI4-1 (cont.) results in an averaged vehicle speed of 2 mph reasonable (the typical human walks between 2 and 3 mph). This approach builds in potential mass evacuation conditions. The modeling also includes assumptions for evacuations of Rolling Hills Elementary School. In the overall proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, following notification, the evacuation travel time for the Glens community and the future project residents is estimated to be as low as 3.5 hours, a substantial improvement over the existing estimate of up to 8.3 hours. Even if SDFRD chooses not to use the Andorra Way evacuation route, there is still an improvement in the evacuation time from 8.3 hours to 5.2 hours. Thus, the project would provide a benefit compared to the existing condition, and the Glens community would be expected to benefit from the additional evacuation routes and reduced evacuation times.</p> <p>Please also see information on prediction of wildfire movements in Section 4 and Appendix B of the Fire Protection Plan, and information regarding improvements in predictive modeling and coordination among City, County, and state agencies, in Sections 2 and 3 of the Evacuation Plan.</p> <p>Please refer to Response to Comment 25 from Haight (Letter SI3A) regarding the VHFHSZ. The presence of the VHFHSZ is the reason that the project Fire Protection Plan was prepared. Individual residential subdivision evacuation plans, including that prepared by the proposed project for the Glens community, have been prepared as a tool to inform the planning, site design and assess improvements incorporated into projects, as well as to provide the public with evacuation information. The EIR analysis is therefore adequate.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI4-1 (cont.) It is important to note that fire and law enforcement agencies involved in implementing an evacuation order do not rely on residential subdivision evacuation plans. Further, Incident Commands and law enforcement are not bound by subdivision-specific evacuation plans. Instead, evacuation managers rely on situation awareness that dictates decision making and where possible, on wildfire pre-plans. The wildfire pre-plans are an operational tool for emergency responders that provide high-level fire environment, assets at risk, preferred evacuation approaches, and other safety information to responding personnel. Please see Section 3 of the Evacuation Plan regarding City evacuation planning actions and coordination.</p> <p>Based on all the considerations discussed in the Evacuation Plan, no changes are required to the finding that project implementation would result in a lessened evacuation time than currently exists for the Glens community, and therefore would not result in a significant impact, as stated in EIR Section 5.14.4.</p>
	<p>SI4-2 Please note that the Peñasquitos Drive/Cuca Street intersection operates at current Level of Service (LOS) E conditions in the AM peak hour, before traffic from the project is included (see EIR Table 5.2-1). The cited LOS levels on EIR Table 5.2-7 are identified for an Opening Day (Near-term) conditions assuming buildout of the project, as well as cumulative projects Merge 56, Pacific Village, and the Preserve at Torrey Highlands. This table identifies Opening Day LOS F for Peñasquitos Drive/Cuca Street, and LOS E for Peñasquitos Drive/Janal Way without mitigation. City-required mitigation for these effects is identified in EIR Section 5.2.2.4 in mitigation measures TRA-1 (Cuca Street signal) and TRA-2 (Janal Way roundabout). The effect of those mitigation measures is addressed in Tables 5.2-12 and 5.2-13, respectively, for Opening Day (2020) and Horizon Year (2050)</p>

## COMMENTS

## RESPONSES

	<p>SI4-2 (cont.) conditions. Both intersections would operate at LOS A under both scenarios.</p> <p>SI4-3 This comment addresses concerns with the project or community plan update process rather than adequacy or accuracy of the EIR. As such, response is not required. For clarification, however on the fluid nature of community plan documents, please refer to Response to Comment 7 of the DeLano letter (SI1). Regarding review of an alternative assuming existing zoning and golf course implementation, please refer to Response to Comment 3 from Haight (Letter SI3A).</p> <p>SI4-4 This comment does not address adequacy or accuracy of the EIR and no response is required. For clarification, however, please refer to the Response to Comment 16 from Haight (Letter SI3A).</p> <p>SI4-5 Greenhouse gases are addressed in Section 5.6, <i>Greenhouse Gas Emissions</i>. Ultimately, a project's greenhouse gas emissions are based on a number of considerations related to vehicular use, alternative modes of transportation, amount of potable water used, types of landscaping, whether there are wood-burning (or even gas-burning) fireplaces associated with a dwelling, types of roofing, availability of photovoltaic panels, etc. As documented in Section 5.5 in Tables 5.5-5 and 5.5-6, the criteria pollutant emissions during periods of maximum construction or operation are well below thresholds of significance. No significant impacts would occur.</p> <p>Also as shown in Section 5.6, project greenhouse gas emissions would result in a reduction of potential emissions from those associated with development of the site under existing planning. As a point of information, and also evaluated in EIR Section 5.6.2.2, projected project emissions were compared with those that could occur under development of the</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI4-5 (cont.) project with the 831 housing units that could be developed under existing single-family residential zoning (refer to Response to Comment 3 from Haight [Letter SI3A]), as well as emissions from regrading and constructing a new golf course consistent with the existing Community Plan land use designation. EIR Tables 5.6-6, 5.6-7 and 5.6-8 tally operational emissions from area, energy, vehicular, solid waste and water sources for the project, the existing RS-1-14 zoning (831 dwelling units), and the existing Community Plan (golf course use), respectively. The project would result in emissions of 1,827 MT CO<sub>2</sub>e per year, which would be 110 MT CO<sub>2</sub>e less than development as a golf course land use and 9,928 MT CO<sub>2</sub>e less than the maximum potential development under the existing zoning.</p> <p>The comment is correct that a bus route serves the project area. Please also refer to the response to Comment 14 from Haight (Letter SI3A) regarding light rail. Based on the reductions cited above, the project would be consistent with California legislature mandates.</p> <p>SI4-6 <b>Topical Response – Quality of Life.</b> The comment does not address the accuracy or adequacy of the EIR. “Quality of life” is a concept that may be viewed differently by different people; however, as it relates to the environmental analysis, the EIR addresses visual issues and community character, air quality, traffic congestion, loss of open space, inclusion of recreational amenities, safety, etc. Relative to the reasonable and feasible alternatives evaluated for the project, please refer to Comment 3 of this letter, as well as to EIR Section 8.0, <i>Project Alternatives</i>.</p>
--	--



COMMENTS

RESPONSES

SI4-6  
cont.

community. If anything it will destroy our quality of life here that the residents of PQ currently enjoy. I would urge you to look at alternate uses for the property which are more in line with the current community plan.

Sincerely,

Todd Derbique  
11235 Del Diablo St.  
San Diego 92129

## COMMENTS

## RESPONSES

Dear Ms. Osborn,

April 6, 2020

The Junipers, Project 586670 SCH: 2018041032

From Joan Commons

14625 Wye St.

619-672-3512

A resident of The Glens of Penasquitos since 1981

Please respond to the following questions:

- SI5-1 1. In order to change the community plan, the changes must be shown to be an improvement or benefit to the community.  
How will dramatically increasing traffic in an already impacted area benefit the existing community?
- SI5-2 Highway 15 is already impacted by rush hour traffic, how will adding 500+ more cars improve the air quality or city housing needs? We don't have access to adequate mass transit.  
Getting onto highway 15 in the morning is already impacted with traffic trying to turn right onto Carmel Mt. Road into the 'get on' lane, with needing to wait for several light cycles before you can squeeze in, and this before new housing on Carmel Mountain Road is occupied.
- SI5-3 How does the plan need to be revised to lessen the impact of the 'traffic calming lane' on Carmel Mountain Road for the south entrance to Junipers that will overlap with the right turn lane onto Penasquitos Drive?
- SI5-4 How will decreasing the grassland area and increasing the amount of hard scape, housing, cement, and paved streets improve the watershed and not negatively impact the water that flows into Penasquitos Creek, through the wetlands and wildlife, and ultimately impact the ocean?
- SI5-5 In an area already impacted by drought conditions, how will increasing the local population, and landscaping that requires water, improve the water restriction measures already in place to preserve what water we do have access to?
- SI5-6 S.1.2.4. How will the 'public' recreation areas in the Juniper plan be safely accessible to the neighborhood west of Penasquitos Dr. when there are no crosswalks designated on all of Penasquitos Dr, including in your roundabout plan? This was a dangerous enough crossing under current conditions. (see also figure 3-12e)
- SI5-7 Proposed Lot Detail and Zoning, figure 3-3. The only public space designated is near the Janal entrance. All other open space is designated as "Private" open space. What needs to change in this plan to make it a benefit to the community?
- SI5-8 Where will you replace the community tennis courts and community-available swimming pool?
- SI5-9 2.4.2 and 2.4.4 "RP community plan" designated this area as a golf course/open space. To be a benefit to the community, what other alternatives should be considered to be a real benefit to our community and not increase our hazards and lower our quality of life?
- SI5-10 This land has already changed ownership several times. What will be done to ensure the plan stays in place and not changed again?

SI5-1 The project would bring a number of benefits to the existing community. Please refer to the Response to Comment 1 from Haight (Letter SI3A).

Relative to adjacent roadways, as demonstrated in EIR Section 5.2, *Transportation/Circulation*, the project would not significantly impact analyzed roadway segments, and would significantly impact the Peñasquitos Drive intersections with Janal Way and Cuca Street, requiring mitigation measures TRA-1 and TRA-2. The mitigation would result in better levels of service (LOS) than under existing conditions. Please also see Responses to Comments 14 and 15, below, specifically regarding improvements at Peñasquitos Drive/Janal Way/Future Project Access.

SI5-2 Commuter peak hour time comprise the "worst-case" periods of time during the day for congestion. Peak hour traffic reflects drive patterns, and it is noted that not all community residents are on the road during peak hour periods. As a result, the technical analysis identifies the proportion of anticipated project and area traffic on the road during these time periods (see EIR Table 5.2-4, which identifies total project volumes, as well as both in and out traffic during morning and evening peak hours). As stated in EIR Section 5.2.2.2, under the heading "Project Operation":

*The project is forecasted to generate a total of 2,144 average daily traffic (ADT) with 107 trips during the AM peak hour (43 inbound/64 outbound) and 150 trips during the PM peak*

## COMMENTS

## RESPONSES

SI5-2 (cont.)

*hour (90 inbound/60 outbound). Table 5.2-4, Project Trip Generation, summarizes the project traffic generation.*

Specific to the number of those trips that would access I-15 during that time period (also as described in EIR Section 5.2.2.2 under the heading “Trip Distribution”), 20 percent of project trips would be expected to be distributed to I-15 to the north, and 25 percent of project trips would be expected to be distributed I-15 south, respectively. As a result, this does not result in 150 or more peak hour trips to the facility, and also would not result in 20 or more peak hour trips to metered ramps, and therefore did not require additional evaluation. As shown on EIR Tables 5.2-5, 5.2-7, and 5.2-9, there would be no change in Level of Service (LOS) from existing conditions with addition of project traffic at I-15 on-ramp intersections (see intersections 2 and 3 for north- and southbound on-ramps from Carmel Mountain Road to I-15, and intersections 10 and 11 for Rancho Peñasquitos Boulevard/Carmel Mountain Road west- and eastbound ramps onto I-15, respectively). Please refer to Response to Comment 4 from DeLano (Letter SI1).

As described in EIR Section 5.5, *Air Quality*, and shown on Tables 5.5-5 and 5.5-6 relative to construction and operations, respectively, project emissions of all criteria pollutants would be below the daily thresholds. Therefore, direct impacts from criteria pollutants would not cause a violation of any air quality standard, contribute substantially to an existing or projected air quality violation, or exceed the particulate matter threshold and thus, the project would not result in any adverse human health effects and impacts would be less than significant.

As analyzed in EIR Section 5.2.4, *Impact 3: Alternative Transportation*, the project would provide connections to transit.

## COMMENTS

## RESPONSES

	<p>SI5-2 (cont.) Please refer to Connectivity Maps in Figures 3-9a through 3-9c for a graphic depiction of project connections to local and regional bus stops, including its relationship to the Sabre Springs Transit Center and Rancho Bernardo Transit Station.</p> <p>Finally, the project would help to alleviate City housing needs through provision of 536 additional residential units, including 81 affordable housing units.</p> <p>SI5-3 Overall, these comments request information and do not address adequacy of the EIR. For information, however, as shown on Figure 3-12c, the deceleration lane on Carmel Mountain Road would extend from I-15 to the new project entry. As such, it would not extend to the Carmel Mountain Road/Peñasquitos Drive intersection. The section of Carmel Mountain Road between I-15 and Peñasquitos Drive is built as two lanes in the westerly direction, and that would not be affected by the project. The deceleration lane would be additional to those two lanes, and the dedicated right-turn lane at the intersection with Peñasquitos Drive would be retained.</p> <p>Based on the analysis of roadway segments and intersections in EIR Section 5.2, potential effects of project design on current traffic flow along Carmel Mountain Road would not constitute a significant impact and no change to project design is required.</p> <p>SI5-4 For clarification about how the project would not negatively impact downstream locations, EIR Section 5.9, <i>Hydrology and Water Quality</i>, addresses storm water flow over and off of the project site, and specifically addresses the comment question in Section 5.9-2, <i>Impact 1: impervious Surfaces and Runoff</i>. Following analysis regarding proposed project design and flow controls, the conclusion stated in Section 5.9.2.4 is:</p>
--	--



## COMMENTS

## RESPONSES

SI5-4 (cont.)

*The project storm drain system would be designed to accommodate storm flows per applicable City requirements, and runoff leaving the site would be regulated by the proposed detention/water quality basins such that no net increase in off-site peak 100 year storm flow rates or amounts would result from project development. Accordingly, potential impacts from project implementation related to runoff rates/amounts and associated potential storm drain capacity, flooding, erosion/sedimentation, and hydromodification effects would be less than significant.*

*Because implementation of the project would retain extensive on-site pervious areas and shallow permanent groundwater aquifers are not present, associated groundwater recharge capacity would not be substantially decreased and related potential impacts would be less than significant.*

Project design meets City standards designed to retain and improve off-flow and water quality downstream impacts. Downstream adverse impacts to Peñasquitos Creek (including associated sensitive species and ultimately the ocean) are not anticipated.

SI5-5 Overall, this comment requests information and does not address adequacy of the EIR. For information, however, as indicated in EIR Section 3.3.1.3, *Sustainable Design Features*, water use comprised a primary focus. As described:

*The project would include the following sustainable and environmentally friendly design features, techniques and materials to reduce energy demand, water and resource consumption, and environmental waste, and to generate renewable energy on site:*

## COMMENTS

## RESPONSES

	<p>SI5-5 (cont.)</p> <ul style="list-style-type: none"><li>• <i>The project would include the following sustainable and environmentally friendly design features, techniques and materials to reduce energy demand, water and resource consumption, and environmental waste, and to generate renewable energy on site:</i></li><li>• <i>Low-flow sprinkler heads, drip irrigation, and automatic weather-sensitive controllers in irrigation systems to reduce water usage;</i></li><li>• <i>Strategic placement of trees to provide shade and cooling; and</i></li><li>• <i>Low Impact Design measures such as use of grasscrete, permeable pavers, extensive landscaping with climate-appropriate materials and other methods to reduce surface runoff.</i></li></ul> <p>These measures would support City and regional goals to minimize water waste.</p> <p>In addition, the City performed a Water Supply Assessment for the project (see Appendix J1), which concluded that sufficient water supply will be available to serve the proposed project.</p> <p>SI5-6 The statement in the comment regarding lack of crosswalks is incorrect. Specific to the roundabout proposed for Peñasquitos Drive and Janal Way, as shown on Figure 3-13e, the crosswalk is indicated in black hatching, and connects the new sidewalks (shown in blue) on the figure. Similarly, crosswalks would be provided at the Peñasquitos Drive intersection at Cuca Street. They are represented by the black hatch lines on Figure 3-12g, and would facilitate pedestrian crossings across Peñasquitos Drive and Cuca Street.</p>
--	---

## COMMENTS

## RESPONSES

SI5-7 This comment requests information and does not address adequacy of the EIR. For information, however, the comment is correct that the proposed Neighborhood Park would be a public park. Please note, however, that public access easements are planned for additional project elements that are labeled as private open space. As stated in EIR Section 3.3.1.5, *Recreational Amenities*, under the heading "Private Park/Recreation Facilities Open to the Public":

*In addition to the proposed public park, the project includes an HOA-owned and maintained private park and social loop trail that would have public access easements to allow public access. With the easement in place, members of the public and the larger Glens community would be permitted to access these facilities. The facilities would be signed as open to the public, and would be open during the same hours to the public and to project residents.*

*The publicly accessible private park is located in the southeastern corner of the project site, adjacent to Carmel Mountain Road. This park incorporates two pickleball courts, a basketball court, shade structures and seating areas. Refer to Figure 3-10 (OS-13 and OS 14) and Figure 3-8.*

*As noted above, an approximately 2.75-mile long social loop trail would trend around the project and would be open to both project residents and other community members. Located within a dedicated open space lot, this trail and affiliated activity area would include a minimum 6 foot-wide, primarily decomposed granite path sited within the open space, as shown on Figure 3-10a (identified as T1) and Figure 3-11, Social Loop Trail. This trail would be available for use by pedestrians and bicyclists and would be an additional amenity to benefit the overall community.*

## COMMENTS

## RESPONSES

	<p>SI5-7 (cont.)</p> <p><i>A 0.58-acre dog park would be provided in the area identified as OS-10 on Figure 3-10a, in the northernmost portion of the project site, accessible from the social loop trail. Separate areas would be provided for large and small dogs, along with seating areas, shade structures and shade trees. The surrounding community would also be permitted to use this park.</i></p> <p>Please also refer to Response to Comment 1 from Haight (Letter SI3A) regarding benefits that would be provided to the community as a whole with implementation of the project.</p> <p>SI5-8 Refer to Response to Comment 2 from Haight (Letter SI3A) regarding the privately-owned tennis courts. The swimming pool has been closed for approximately four years. The golf course is currently fenced off and is not available to neighborhood use. As such, no analysis for changes to publicly available recreational amenities is required. However, the project includes recreational amenities as part of the project as mentioned above.</p> <p>SI5-9 Please refer to Response to Comment 6 from Derbique (Letter SI4) regarding “quality of life.” Please refer to Response to Comment 1 from Haight (Letter SI3A) regarding benefits that would be provided to the community as a whole with implementation of the project, including improvements to emergency evacuation. The comment also mentions loss of open space; however, it is important to note that the project site is an abandoned golf course, that is fenced off and is not usable to the community as open space. The prior golf course use has been closed since 2015. Refer to Response to Comment 7 from DeLano and DeLano (Letter SI1) regarding the loss of the prior golf course.</p>
--	---



## COMMENTS

## RESPONSES

- SI5-9 (cont.) Alternatives evaluated for the project are addressed in EIR Section 8.0, *Project Alternatives*. Alternatives reviewed include an alternative site, a no project/no development alternative, a no project/community plan consistency alternative (i.e., a redeveloped golf course on the site), a reduced intensity alternative, and an existing zoning alternative.
- SI5-10 Project analyses address the proposed project design and environmental effects. They are not intended to control project ownership. As such, the comment does not relate to the adequacy or accuracy of the EIR, and no response is required. For clarification however, the project proposes a Community Plan Implementation Overlay Zone (CPIOZ). Please refer to the Response to Comment 16 from Haight (Letter SI3A) for additional information.

## COMMENTS

## RESPONSES

<p>SI5-11 2. Much of your plan describes the adjoining property as the Hotel Karlan, which has now closed and will become high density apartments. What changes need to be made to this plan to accommodate the daily traffic and congestion brought on by this adjoining project?</p>	
<p>SI5-12 How will you accommodate possible emergency evacuation of hundreds of cars from the proposed apartments at the only exit at Cuca St and Penasquitos Drive along with the 536 potential vehicles from Junipers onto the same Penasquitos Drive along with the entire neighborhood beyond Janal Way for whom this is the only emergency exit?</p>	<p>SI5-11 The Millennium PQ was not known at the time of issuance of the project Notice of Preparation (NOP) of an EIR, which was the time the environmental baseline and cumulative projects list was set (April 2018). Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional discussion of this point. No changes have been proposed to the proposed project plans, in relation to the Millennium PQ development.</p>
<p>SI5-13 3. There are inconsistent descriptors of the potential buyers in the Juniper plan. Who will be able to purchase or rent in this neighborhood? How will purchase or renting be controlled? How will multi-generational families be restricted so that young children are not living in the neighborhood and impacting the local schools? What will prevent outsiders from buying property as rental property and renting to younger families with children which will then impact the local schools? S.1.1 '455 units for sale', age not specified     '81 for rent, affordable housing', age not specified     'age qualified' but not specific S.1.2 "for sale market value" does not specify the age restriction,     'rent...affordable...age-qualified' does not specify the age</p>	<p>SI5-12 Refer to the Response to Comment 1 from Haight (Letter SI3A).</p> <p>SI5-13 <b>Topical Response – Project Age Qualifications.</b> As mentioned in numerous places in the EIR, both the market rate and affordable components of the project would be “age-qualified” (see the EIR Summary and Sections 1.0, 3.0, 5.1, 5.2, 5.5, 5.6, 6.0, 7.0, and 8.0) for persons 55 and over.</p>
<p>SI5-14 4. Access to Junipers, and impact on the community S.1.1 'Primary access will be at Janal and Penasquitos Drive with a roundabout'. I have lived in this community since 1981 and use this intersection every day. Under current conditions, during work/school hours, it is already very difficult to turn left from Janal onto Penasquitos Dr. to take children to Rolling Hills School or to turn right for everything else. How will a roundabout possibly be able to handle current traffic heading south on Penasquitos Dr. as well as all the residents of the Junipers that will be trying to get to work?</p>	<p>To clarify, this means that residents need to be at least 55 years of age to buy or rent a home in the community. An exception is typically granted for a younger spouse who is married to someone who is 55 or older. Other exceptions include adult caregivers and a disabled child or grandchild who is dependent on the resident. For all others, a maximum number of days is typically established in the HOA Conditions, Covenants and Restrictions (CC&amp;Rs) and community bylaws recorded against the property as such for any person who is under the age of 55 to be permitted to stay on the premises, in order to permit visitors but not additional residents under 55.</p>
<p>SI5-15 How does the plan need to be revised to avoid the double impact of a roundabout and traffic light within one block of each other?</p>	
<p>SI5-16 Why is a traffic light being planned by Junipers when that will provide access to the proposed apartments, not the Juniper or current resident population?</p>	
<p>SI5-17 S.1.2.9 Mass transit has only the 'stop and go' bus that takes a long time to get anywhere out of the neighborhood. The downtown express bus now only is accessible from Rancho Bernardo transit center (car drive to get there), or the Sabre Springs transit center (another car ride to get there). How do you expect the residents to access mass transit without also having to use a car which will still impact the Penasquitos Drive traffic?</p>	<p>The application of the age-restricted (55+) category would be a condition of project approval and will be embodied within the project CC&amp;Rs. Per the Housing for Older Persons Act (HOPA) of 1995, once the project is turned over to the homeowners, it is the responsibility of the community leaders and the Community Manager (i.e., Homeowner's Association or apartment owner/manager) to abide by the requirements of the Fair Housing Act. Affidavits must be filed based on proof of age.</p>
<p>SI5-18 How will the senior residents acquire food when the only stores within walking distance in a short time are a small 7-11, or gas station store?</p>	

## COMMENTS

## RESPONSES

	<p>SI5-13 (cont.) This occurs whether or not they own or rent the property. The HOA retains the right to monitor and check that the occupants of the home follow the Housing for Older Persons Act and the Fair Housing Act. When the property transfers title, or when new renters move in, this same check takes place. All renters and owners are re-registered with the HOA yearly, or if they are brand new.</p> <p>With respect to school impacts, as stated in Section 7.1.5 of the EIR:</p> <p><i>The project would provide age-restricted (55+) housing, which means that, with very rare exceptions, no school age children would be permitted to reside within the development and no impacts to schools would occur. Despite generating no new school attendance, the project would be required to pay applicable impact fees to the school district.</i></p> <p>The low likelihood of public school students and the surety that the project would pay developer impact fees that could be used to address school pressures if they should occur, results in the ultimate finding that the project's impacts to schools would be less than significant.</p> <p>SI5-14 Janal Way currently has a stop sign at the intersection with Peñasquitos Drive, while Peñasquitos Drive is not stop-controlled and operates freely. This can make entering the turn onto Peñasquitos Drive difficult, especially for those trying to make a left turn across traffic. The roundabout would render travelers in all directions more equal. Traffic would slow in proximity to the roundabout, and entry from Janal Way would be easier as travelers would turn right and continue through the roundabout toward Carmel Mountain Road, or circle the roundabout to smoothly continue toward points northerly. Please refer to the Response to Comment 20 from Haight A (Letter SI3A) for additional information.</p>
--	---

SI5-15 **Topical Response – Peñasquitos Drive Vehicular Queue Lengths.** Project traffic modeling evaluates the transportation system as a whole. Therefore, it takes into account the proposed improved condition along Peñasquitos Drive, including the roundabout at Janal Way and a signalized intersection at Cuca Street. As shown by the modeling, there is no negative result resulting from the two project improvements and the plan does not need revision. This is supported by queue analysis. Table 17-1 of the EIR Traffic Study (EIR Appendix B) and EIR Table 5.2-12 show Opening Day (2020) Near-term queue analysis. The southbound queues at Peñasquitos Drive with Janal Way would be 125/75 feet in the AM/PM peak hours, with LOS A/A operations, respectively. In the northbound direction, AM/PM peak hour queues would be 25/75 feet, also LOS A/A. At Peñasquitos Drive and Cuca Street, in the AM/PM peak hours, southbound queues would be 210/97 feet and 170/372, respectively, also both at LOS A/A. Table 17-2 of Appendix B and EIR Table 5.2-13 show Horizon Year (2050) calculated northbound and southbound queues at the Janal Way intersection with Peñasquitos Drive. As shown, the southbound queues along Peñasquitos Drive at Janal Way would be 150 feet/25 feet in the AM/PM peak hours, with LOS A/A operations, respectively. For the northbound direction, queues at this location would be 25 feet/100 feet in the AM/PM peak hours, with LOS A/A operations. At Peñasquitos Drive and Cuca Street, in the AM/PM peak hours, southbound queues would be 226/107 feet and 191/425, respectively, also both at LOS A/A. No significant environmental impacts would result.

## COMMENTS

## RESPONSES

	<p>SI5-16 Overall, this comment requests information and does not address adequacy of the EIR. For information, however, the proposed signal would not only control traffic entering or exiting the previous Hotel Karlan property, but also through traffic on Peñasquitos Drive and traffic entering Peñasquitos Drive from Cuca Street. As discussed in EIR Section 5.2.1.1, <i>Environmental Setting</i>, that intersection currently operates at LOS E in the AM peak hour. That condition would additionally worsen with contributions by the proposed project's traffic, and mitigation would be required with mitigation measure TRA-1 (see 5.2.2.4 of the EIR). With the signal, traffic flow during both AM and PM peak hours would improve to LOS A, the least congested condition.</p> <p>SI5-17 Project sidewalks and bike facilities would provide pedestrian and cyclist access through the site, and facilitate more direct, safe connections to the adjacent circulation system and public transit for project residents and adjacent community residents. Please see the site, local and regional connectivity maps (Figures 3-8a through 38c) in EIR Section 3.0. Similar to other community residents, people living at the proposed project would be expected to use local bus service where convenient, or where accessing the larger transit hubs by public transportation, and otherwise would use cars to access those facilities, as preferred. Proximity to these facilities is still expected to provide benefit as they are easily accessible. Please refer to Response to Comment 2 from DeLano (Letter SI1) regarding numbers of trips per day anticipated by Junipers residents.</p> <p>SI5-18 The comment poses a question regarding shopping habits of future residents. As such, the comment requests information and does not address adequacy of the EIR and no response is required.</p>
--	--



## COMMENTS

## RESPONSES

<p>5. Emergency Evacuation See Illustrative Site Plan, figure 3-1, Existing Topography figure 2-3, Areal view 2-4. Since 1981, I have experienced 4 fires in the neighborhood, two on Black Mountain and the Witch Creek Fire and Cedar Fire. Imagine you are living in any one of the houses north of the intersection of Janal Way and Penasquitos Drive. How does this plan need to be changed to ensure an efficient evacuation of that entire section of the neighborhood with over 500 vehicles trying to exit from Junipers and hundreds more from the proposed apartments all onto Penasquitos Drive? With only one regular exit in the Juniper plan into a roundabout, how does the plan need to be changed to ensure all of the Juniper residents can evacuate efficiently?</p> <p>How does the plan need to be changed to ensure emergency vehicles can enter the Juniper area when the emergency vehicles would be entering from Carmel Mt. Road (which is also designated as an emergency exit for residents), or travel through the Janal roundabout which is the emergency exit for the residents, or travel through the roundabout to Del Diablo Road to enter from the far north?</p> <p>How does the plan need to change for the residents in the northern portion of Junipers to efficiently and safely evacuate? Do they take the exit out at Del Diablo and join in the thousands also leaving through the entire neighborhood? Do they travel through Junipers to the Janal exit into a roundabout already heavily impacted by the neighborhood, or do they travel all the way down to the now open Carmel Mountain exit where they can only turn right into the Penasquitos Drive evacuees, or blend into the Carmel Mountain Road evacuees from Cresta Bella, Penasquitos Villages, etc.?</p> <p>6. S.1.2 'address city housing' The only mass transit available is the 'stop and go' bus that takes a long time to get anywhere outside the neighborhood. To access the express bus to downtown, a car is needed to get to the RB transit center or the Sabre Springs transit center. How will the Juniper plan accommodate all the extra car traffic since mass transit is so limited in this area?</p>	<p>SI5-19 The Project evacuation analysis does not rely solely on exit via Peñasquitos Drive at Janal Way. The plan does not require change as it takes existing Glens traffic, future project traffic, and changed access/egress conditions into account. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plans. Regarding Millennium PQ, please also refer to the Response to Comment 5 from DeLano (Letter SI1).</p> <p>SI5-20 The plan does not require revision. As shown on EIR Figure 3-12c and 3-12d, Private Driveway V, which would intersect Carmel Mountain Road, is designed to provide two lanes. The northbound lane ordinarily would function to accommodate internal vehicles accessing the project from Carmel Mountain Road. A southbound lane for emergency egress is also provided. Although it would not ordinarily be in use, it would be available for vehicles exiting the site in case of emergency. Please also note that all vehicular traffic would be subject to direction by emergency personnel in such an event. Refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements.</p> <p>Relative to emergency travel through the roundabout at Janal Way and Peñasquitos Drive, the roundabout would be constructed in compliance with all City requirements, including design to accommodate emergency vehicles. Please see Figure 3-12e of the EIR, which depicts the roundabout, as well as the Response to Comment 20 from Haight (Letter SI3A) regarding roundabout design and accommodation of emergency vehicles.</p>
---	--

## COMMENTS

## RESPONSES

SI5-21 The plan does not require revision. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan. Specific directions as to best route would be determined by emergency response personnel at the time of the evacuation event. The Project would provide at least three alternate routes, improving evacuation efficiency and timeframes. The Wildland Fire Evacuation Plan, Appendix K4 to the EIR, is an informative document for Glens and proposed project residents. Actual evacuation scenarios would be determined and executed by emergency response professionals, based on the location and type of fire, weather conditions, and available options for evacuation.

SI5-22 Please refer to Response to Comment 17 of this letter.

COMMENTS

RESPONSES

**From:** Melissa Ellefsen <melissa.ellefsen@gmail.com>  
**Sent:** Thursday, February 20, 2020 3:27 PM  
**To:** DSD EAS  
**Subject:** Junipers Project, Project #586670

Hello,

SI6-1

I am a homeowner in this neighborhood and this new development would directly impact me. I am completely against it. Can you tell me how adding a roundabout on Janal Way, when there is a traffic light less than a mile away, would be beneficial to any current resident? Can you tell me how that would make this neighborhood safer in the event of a wildfire? When I bought my home, this land was designated as open space. It should not be turned into residential property. Please do not change the zoning.

Thank you,  
 Melissa Ellefsen

SI6-1 Comments noted. Overall, these comments request information and do not address adequacy of the EIR. For clarification, however, please refer to the Response to Comment 20 from Haight (Letter SI3A) for detailed information regarding traffic signal and roundabout operations, and to Response to Comment 3 (Letter SI3A) of that same letter regarding existing and proposed zoning. Fire safety is addressed in EIR Sections 5.14.3 and 5.14.4. Regarding the loss of open space associated with the former golf course site, please refer to the Response to Comment 7 from DeLano (Letter SI1).

## COMMENTS

## RESPONSES

**From:** [Diane Alföldy](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] The Junipers Project  
**Date:** Monday, April 06, 2020 10:13:57 AM

RE:  
 The Junipers Project  
 no 586670/SCH  
 No. 2018041032  
 5.2-25 Travel

How can you suggest a roundabout and 2 stop lights within a block be efficient?

I have lived in PQ for 35 years and live at the far end of Andorra Way. I have driven to work for most of that time. Over the years I have seen an increase in traffic at the PQ Dr and Carmel Mt Road. This has been increased more recently with the Apts on the corner of PQ Dr and CM Road and now the addition of many new residences on the east side of Carmel Mt Rd. This has increased the driving time through the stop light at the mentioned intersection when heading south to north for those heading to the freeway while increasing the drive time wait for the turn on PQ rd to CM Rd. Now you are adding the Juniper population to exit onto PQrd then onto the freeway.

I don't see how a roundabout can be efficient for all the residents of north PQ. I can see it as a road hazard for all participants trying to get on the round-about. It appears that the Junipers and those coming out of Janal will definitely be at an advantage with backlogs down PQ RD. The traffic on the roundabout will back up with a stop light one block further towards CM Rd. and then we will have to wait for another (shortened) light to get on the freeway. This will only get worse if the Hotel Karlan is going to be converted into residences.

My other fear is the safety of bike riders and the drivers on the roundabout because they are difficult to see when they are next to you when you are trying to get out of the round about.

My other concern is the ability for fire engines, large trucks, etc to make the loop around the roundabout. I have been on them in other cities and this one looks fairly small to accommodate emergency vehicles if needed in an emergency.

This road plan will turn also turn into a nightmare for those of us who live farthest away from the intersection to the freeway. We will never get out with this increase in population and limited freeway access.

I have no solutions and feel this plan meets only the direct needs of this development!!!

Diane Alföldy  
 15525 Andorra Way  
 San Diego, Ca 92129

S17-1 Comments noted. Pursuant to CEQA Guidelines Section 15125(a), an EIR measures the impacts of a proposed project against a "baseline" of existing environmental conditions at and in the vicinity of the project site. Existing conditions traffic counts, reflecting the land uses in place at the time the Transportation Impact Analysis was initiated, are part of that baseline.

As shown on EIR Table 5.2-1, the Carmel Mountain Road/Peñasquitos Drive intersection operates at Level of Service (LOS) C, an acceptable LOS, in both the AM and PM peak hours (the most congested periods of the day). This LOS C would be expected to continue for all project impact scenarios analyzed. This includes project implementation only (EIR Table 5.1 5); on Opening Day (2020) Plus Project (Near-term) with cumulative projects in EIR (Table 5.2-7); and under Horizon Year (2050) Plus Project conditions (EIR Table 5.2-9).

Although the Peñasquitos Drive and Janal Way intersection currently operates at an acceptable LOS C for the worst-case movement, the Transportation Impact Analysis showed worst case movement degrading to LOS E with project traffic. As a result, mitigation was required to address that significant impact.

## COMMENTS

## RESPONSES

	<p>SI7-1 (cont.) Refer to the Response to Comment 20 from Haight (Letter SI3A) regarding the proposed roundabout, which would result in that intersection operating at LOS A both with the project and under Horizon Year 2050 Plus Project conditions.</p> <p>The comment is correct that the roundabout would benefit cross traffic from Janal Way onto Peñasquitos Drive. This intersection is currently controlled by stop signs on Janal Way only – allowing for faster moving traffic along Peñasquitos Drive. The proposed roundabout would allow equal, safe entry into the roundabout from all directions, which would improve entry and crossing potential for travelers entering from Janal Way.</p> <p>Please refer to Response to Comment 15 from Commons (Letter SI5) relative to queuing along Peñasquitos Drive.</p> <p>Therefore, EIR Section 5.2.2.4 concludes direct and cumulative impacts to the intersections of Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and Peñasquitos Drive/Janal Way/Future Project Access would be reduced to less than significant with the incorporation of a traffic signal and a roundabout per TRA-1 and TRA-2, respectively. Regarding the Hotel Karlan redevelopment/Millennium PQ, please refer to the Response to Comment 5 from DeLano (Letter SI1).</p>
	<p>SI7-2 Refer to the Response to Comment 20 from Haight A (Letter SI3A) for detailed information regarding roundabout operation, including bicycle rider safety.</p>
	<p>SI7-3 The roundabout has been designed to accommodate community vehicles as well as emergency response vehicles, such as fire trucks. The design is schematically shown on EIR Figure 31-3e, which shows proposed lanes, fire truck aprons, etc.</p>



## COMMENTS

## RESPONSES

- | COMMENTS | RESPONSES  |
|----------|--|
|          | <p>SI7-3 (cont.) Refer to the Response to Comment 20 from Haight A (Letter SI3A) for additional information regarding roundabout operation.</p> <p>SI7-4 Comment noted. As a general project concern rather than a comment on adequacy or accuracy of the EIR, no response is required. For clarification, however, please refer to Response to Comment 1 of this letter regarding function of neighborhood streets.</p> <p>SI7-5 Comment noted. As a general project concern rather than a comment on adequacy or accuracy of the EIR, no response is required.</p> |

## COMMENTS

## RESPONSES

**From:** David Birdsall <dnbirdsall@gmail.com>  
**Sent:** Saturday, February 22, 2020 10:55 PM  
**To:** DSD EAS  
**Cc:** Fran & Steve Stone; Diane Birdsall Wood; Danielle Beccarelli; Doug Birdsall  
**Subject:** Junipers Development

Sara Osborn  
 City of San Diego Development Services Center  
 1222 First Avenue, MS 501  
 San Diego, CA 92101

SI8A-1

Ingress and egress were discussed with the Junipers developers multiple times before, but, as usual, they preferred the cheap and more risky route!!! Point being that there is really only one emergency "egress" from Rancho Penasquitos, which is at the end of Andorra Way. There is no additional ingress/egress planned for normal use. One of the recommendations that was suggested was additional on-ramps/off-ramps to freeway 15. Penasquitos Drive is already, at times, extremely busy. Add to this all of the new inhabitants at the new constructions across from the Karlan and south of the Chevron on the corner of PQ Drive and Carmel Mountain Road ... and then the Juniper's 536 residential units, 455 multi-family units, and 81 apartments in the three-story building (e.g., in excess of 1000 new dwellings). If the development isn't going to be done right, then it should not be approved!!!

SI8A-2

I've lived in Rancho Penasquitos since 1976, and have been "trapped" in the Rolling Hills area before with no way out. We purchased our house because this was such a beautiful community. If developers are wanting to further develop the PQ area, then they should be required to ensure that our quality of life isn't adversely affected by unacceptable traffic congestion.

Thank you.

David N. Birdsall  
 15305 Andorra Way  
 San Diego, CA 92129

SI8A-1 The comment does not correctly describe the ingress and egress and emergency route for the project. Please refer to Section 3.3.1.6 in Chapter 3.0, *Project Description*, which addresses primary access from Carmel Mountain Road and would also provide emergency response access and community emergency-only egress. In addition, primary vehicular access to the project, as well as fire and emergency access, would be from a new driveway connecting to Janal Way at the current intersection of Janal Way with Peñasquitos Drive. The Andorra Way/Corte Raposo emergency access/egress point would not be the sole egress point, but would be in addition to Carmel Mountain Road and Janal Way improvements.

SI8A-2 **Topical Response – Lack of Need for Additional I-15 Interchanges.** The comment suggests additional on-/off-ramps with I-15. Given the few trips added to the nearest interchange where the majority of freeway-oriented trips would enter/exit I-15, it can be concluded there would be no nexus for the project to consider constructing a new interchange with I-15. The comment also notes that Peñasquitos Drive is very busy at times. The Transportation/Circulation evaluation in EIR Section 5.2 is based on a Level of Service (LOS) analysis, which specifically looks at the level of congestion on roadway segments and at area intersections for the 536-unit project in the near term and under buildout conditions.

## COMMENTS

## RESPONSES

SI8A-2 (cont.) As shown on EIR Table 5.2-2, relevant portions of Peñasquitos Drive currently operate at LOS C on a daily basis, an acceptable LOS. (Acceptable LOS for freeways, roadways, and intersections is generally "D" and above.) LOS C continues for these segments with the project (see EIR Table 5.2-6), as well as in the Opening Day (2020) Plus Project (Near-term) Plus Project on Table 5.2-8. Table 5.2-8 models traffic loading associated with existing conditions, the project, and three additional potential projects; including Pacific Village (the project alluded to in the comment as south of the Chevron) as well as Merge 56 and the Preserve at Torrey Highlands. Horizon Year (2050) Plus Project conditions are shown on EIR Table 5.2-10. As a result, there is no significant project impact that requires roadway segment mitigation. Mitigation is only required for significant impacts, which in this case would occur at two intersections (see Response to Comment 1, above). The mitigation measures would improve the flow of traffic from the project and other areas of the community. Because the project would not result in significant impacts related to roadway segments, or at the intersection of I-15 southbound ramps/Carmel Mountain Road, there is no CEQA justification or need for additional I-15 on-/off-ramps. Implementation of new connections to freeways requires the approval of Caltrans, and is subject to interchange design and spacing requirements imposed by the Federal Highway Administration (FHWA).

The remainder of the comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.

## COMMENTS

## RESPONSES

**From:** [David Birdsall](#)  
**To:** [DSD\\_FAS](#)  
**Cc:** [Fran & Steve Stone](#); [Doug Birdsall](#); [Diane Birdsall Wood](#); [Danielle Beccarelli](#)  
**Subject:** [EXTERNAL] Junipers EIR review  
**Date:** Monday, April 06, 2020 7:12:52 PM

Ms. Sara Osborn

City of San Diego Development Services Center  
 1222 First Avenue, MS 501  
 San Diego, CA 92101

I have lived in Rancho Penasquitos since October 1976.

On 22 February I sent you an e-mail with my concerns about the Junipers Development. As I have not heard any response I am re-submitting them.

- SI8B-1 1. Including all of the new developments constructed or being constructed within the last eight years within ½ mile of the Karlan, what is the total increase in population and traffic projected to be?
- SI8B-2 a. Over 30 years ago, Penasquitos Drive was shut down, trapping everyone west of the Karlan. How much worse will it be now?
- SI8B-3 b. It was recommended multiple times over the past twenty years, if the golf course area was redeveloped, that additional on/off ramps were required!!!
- SI8B-4 2. Is there a dog park planned for the golf course area? The closest one is across from the police station on Salmon Road.
- SI8B-5 3. Are there rest rooms planned at the park which is to be built on what was the golf course?

Regards,

David N. Birdsall

15305 Andorra Way

San Diego, CA 92129

----- Forwarded message -----

From: **David Birdsall** <[dnbirdsall@gmail.com](mailto:dnbirdsall@gmail.com)>

SI8B-1 Impacts reviewed under CEQA are conducted using an existing conditions baseline, and project impacts are assessed relative to changes from that baseline. Any past projects are a part of the existing baseline condition. Population and housing effects are assessed in EIR Section 7.1.4; impacts were identified as less than significant. The existing conditions baseline against which impacts are assessed is described for each technical issue in Section 5.0, *Environmental Analysis*. EIR Section 5.2.2 addresses traffic impacts based on the project, as well as cumulative projects. In addition, the EIR contains a separate evaluation of the effects of the proposed project combined with potential cumulative projects that are planned or proposed for construction, to result in cumulative impacts. Cumulative projects addressed in the EIR include Pacific Village, Merge 56 and the Preserve at Torrey Highlands. The Millennium PQ project was not known at the time of issuance of the project NOP, when the project baseline was set. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional discussion.

## COMMENTS

## RESPONSES

	<p>SI8B-2 Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>SI8B-3 Please refer to Response to Comment 2 of your communication of February 22 (Comment letter SI8A) regarding lack of need for additional I-15 on-/off-ramps.</p> <p>SI8B-4 The neighborhood park currently is planned to include dog runs, a game plaza, children's play slope, playground, and picnic areas, among other amenities (see EIR Figure 3-10b). In addition, as stated in EIR Section 3.3.1.7,</p> <p><i>A 0.58-acre dog park would be provided in the area identified as OS-10 on Figure 3-10a, in the northernmost portion of the project site, accessible from the social loop trail. Separate areas would be provided for large and small dogs, along with seating areas, shade structures and shade trees. The surrounding community would also be permitted to use this park.</i></p> <p>Please refer to Section 3.3.1.5 of the EIR for additional information regarding the proposed recreational amenities associated with the proposed project.</p> <p>SI8B-5 Yes, restrooms are planned at the park. Please see Figure 3-10b, which shows location of a "comfort station" at location 16 in the neighborhood park.</p>
--	---



## COMMENTS

## RESPONSES

Date: Sat, Feb 22, 2020 at 10:55 PM  
Subject: Junipers Development  
To: <[DSDEAS@san-diego.gov](mailto:DSDEAS@san-diego.gov)>  
Cc: Fran & Steve Stone <[franmstone@hotmail.com](mailto:franmstone@hotmail.com)>, Diane Birdsall Wood <[sdakwood@aol.com](mailto:sdakwood@aol.com)>, Danielle Beccarelli <[dbeccarelli@gmail.com](mailto:dbeccarelli@gmail.com)>, Doug Birdsall <[ouwraz@aol.com](mailto:ouwraz@aol.com)>

Sara Osborn  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

SI8B-6

Ingress and egress were discussed with the Junipers developers multiple times before, but, as usual, they preferred the cheap and more risky route!!! Point being that there is really only one emergency "egress" from Rancho Penasquitos, which is at the end of Andorra Way. There is no additional ingress/egress planned for normal use. One of the recommendations that was suggested was additional on-ramps/off-ramps to freeway 15. Penasquitos Drive is already, at times, extremely busy. Add to this all of the new inhabitants at the new constructions across from the Karlan and south of the Chevron on the corner of PQ Drive and Carmel Mountain Road ... and then the Juniper's 536 residential units, 455 multi-family units, and 81 apartments in the three-story building (e.g., in excess of 1000 new dwellings). If the development isn't going to be done right, then it should not be approved!!!

I've lived in Rancho Penasquitos since 1976, and have been "trapped" in the Rolling Hills area before with no way out. We purchased our house because this was such a beautiful community. If developers are wanting to further develop the PQ area, then they should be required to ensure that our quality of life isn't adversely affected by unacceptable traffic congestion.

Thank you.

David N. Birdsall  
15305 Andorra Way  
San Diego, CA 92129

SI8B-6 The remainder of this comment was responded to based on the February 22 submittal, as noted above (Comment letter SI8A). Please refer to that letter and responses.

## COMMENTS

## RESPONSES

**From:** [Dan Cicchelli](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** Junipers / Project No.586670 EIR Review  
**Date:** Thursday, February 20, 2020 11:24:34 AM

Ms. Osborn,  
 I have reviewed the EIR for this project in depth.

- SI9-1 My first concern is that further traffic studies need to be completed as follows:  
 1. The initial study was extremely short in duration and is not likely a reliable source. I believe that the impacts on Penasquitos Drive and Carmel Mountain Road will be significantly more than reported. I would like to ask for the study to be repeated, **with at least one full week of data- not 48 hours, AND including a weekend.** This should have been mandated in the first place, as it will more accurately demonstrate the reality of the local traffic.
- SI9-2 2. The traffic study should also be repeated in lieu of recent development proposals in the area: Pacific Villages (in process- 600+ homes), Millenium PQ (proposed on former site of Hotel Karian- 300 homes), and the proposed redevelopment of the former Carmel Mountain Ranch Golf Course- 1200-1400 homes. Not counting the Junipers Project (536 homes), the other three developments aim to add an additional **2400 homes to the immediate area. THIS WILL DRASTICALLY CHANGE THE TRAFFIC SCENERIO IN THE CARMEL MOUNTAIN RANCH/GLENS NEIGHBORHOODS.**
- SI9-3 My second concern is that the risk of life and property will be significantly increased in the case of a fire. The section of the EIR regarding fire basically hinges it conclusion on Santa Ana winds blowing west, away from the existing homes and proposed developments. THIS IS AN ABSOLUTELY RIDICULOUS CONCLUSION. We all know that winds are very unpredictable, especially on fire prone days. If the City of San Diego is willing to put it's residents at risk on such a weak platform of fire safety, then we will be looking much more closely at who is voting to approve such projects. Also, let it be stated in writing that the City will be taking on tremendous liability if it accepts the proposed project in its current form, especially as it relates to fire safety and evacuation.
- SI9-4 For the record, I am not entirely opposed to the Junipers Project, but I am opposed to it in its current form. The road plans are a huge problem and the density is significantly more than the Glens Neighborhood can tolerate. I'd be happy to discuss further if you have any specific questions about my concerns.

Thank you for your time.

Dan Cicchelli, homeowner  
 11251 Del Diablo Street  
 (760) 845-6426  
[dancicchelli@gmail.com](mailto:dancicchelli@gmail.com)

#### SI9-1 **Topical Response - Vehicular Counts and Peak Hour Periods.**

No additional analysis is needed. Existing conditions data were gathered in accordance with City traffic guidelines. The City of San Diego Transportation Impact Study Manual (July 1998) provides the study parameters for conducting traffic studies. Per the manual, there is no requirement on the number of days of data used in the traffic analysis. Industry standards of practice are to conduct weekday counts over a 24-hour period for roadway segment and AM and PM peak hour traffic counts for intersections during adjacent street peak periods (typically between 7:00-9:00 AM and 4:00-6:00 PM commute timeframes when the school year is in session). The traffic counts used in the analysis for the project comply with City standards. The peak periods for a residential project would be weekdays, during the morning and evening commute periods (when most residents are going to or from work), and when the school year is in session. Relative to weekend counts, it is only on rare occasions that a project would analyze weekend timeframes. These include entertainment type projects, such as stadiums and theme parks, or religious assembly uses when traffic use patterns for those particular uses peak during the weekend. The proposed project is a residential project and does not fall within those parameters.

The use of weekday "peak hour" periods therefore assesses when traffic congestion is greatest (worst-case), and then identifies mitigation to address that worst-case level of impact. For additional information regarding the approach to the traffic analysis, please refer to Section 4.0, *Study Area, Analysis Approach and Methodology*, within the project Transportation Impact Analysis in Appendix B of the EIR.

	<p>SI9-2 The Transportation Impact Analysis addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018, including Pacific Village. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.</p> <p>SI9-3 <b>Topical Response – Fire Behavior Modeling.</b> This comment contains a misunderstanding of the EIR fire discussion. The document does not base its conclusions on fires blowing to the west and away from homes west of I-15. The analysis does say that prevailing Santa Ana patterns blow westerly. However, the evaluation reviewed fire approaching from open space areas to the west, north and east and burning under typical on-shore wind conditions as well as the occasional extreme off-shore Santa Ana winds. It is a standard fire behavior modeling and assessment practice to consider fires burning under normal conditions as well as those under extreme fire weather conditions. This equates to a fire burning from the west toward the project as well as one burning from the northeast toward the project. As stated in EIR Section 5.14.4.2 regarding emergency response/evacuation:</p> <p><i>Because of its proximity to the VHFHSZ associated with the Black Mountain Open Space Park to the west, a Wildland Fire Evacuation Plan was prepared for the project (EIR Appendix K4). As discussed in this evacuation plan, wildfire emergencies that would be most likely to require an evacuation of the project area would be either a large wildfire approaching from the Black Mountain Open Space Park which is west, northwest, and southwest of the project site, or a large wildfire approaching from the north/northeast with potential to spot into the project or the adjacent Black Mountain Open Space Park. Large wildfires are often wind driven and occur during declared Red Flag Warning days where low humidity and high winds facilitate fire ignition and spread. If a fire starts in the Black Mountain Open Space Park and is fanned by Santa Ana winds out of the</i></p>
--	---

## COMMENTS

## RESPONSES

SI9-3 (cont.)

*northeast, the fire likely would tend to blow away from the project site toward the southwest, west or south. Local winds may result in fire that burns toward the site, but terrain does not support aggressive runs at the community, which is separated from the open space by developed areas.*

As described, fires can burn in any direction given the appropriate fuel, winds and topography. There are, however, factors that generally support or retard rapidly moving flames. For instance, fires burn uphill more rapidly than downhill, and therefore rising topography can exacerbate flames. In the project's case, the nearest slopes associated with generally undeveloped lands are a minimum of 250 feet from the nearest portions of the project, they slope up and away from the project and include Peñasquitos Drive and other developed landscapes as ignition resistant buffers. It is also true that dry vegetation and scrub communities provide the fastest burning fuel when compared to irrigated landscaping and appropriately built-to-code structures, which can tend to slow fires. These are taken into account in fire dispersion models. To that extent, project landscaping would consist of hardscape and irrigated landscaping throughout the project and would be regularly maintained. The terrain that is between the project and the nearest open space fuels at Black Mountain Open Space is not favorable to fast fire spread (downslope), and there are developed landscapes on the lower slopes of Black Mountain. These conditions would tend to allow for greater evacuation time within existing communities than a former, non-irrigated golf course with dry grasses that could ignite from embers during any wildfire event. Fires burning from the west to the east would be burning under a non-Santa Ana wind condition, resulting in higher humidity, higher plant moisture levels, slower fire spread, lower intensity and much easier fire control by suppression efforts.

## COMMENTS

## RESPONSES

- |  |  |
|--|--|
|  | <p>SI9-3 (cont.) Fire burning under Santa Ana wind condition from the northeast would not have continuous available fuels to burn into the Glens community due to intervening I-15 and developed landscapes between the Glens and the nearest open space in that direction (Twin Peaks, approximately 2 miles distant). For more on fire, please refer to Responses to Comments to Razvi, Letter SI52A, and particularly to Response to Comment 137.</p> <p>SI9-4 Comments noted. This comment expresses the opinion of the commenter and does not address the adequacy of the EIR. No response is required.</p> |
|--|--|



## COMMENTS

## RESPONSES

**From:** [Tim Clayton](#)  
**To:** [DSD FAS](#)  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Sunday, April 05, 2020 7:31:41 PM

Attention Sara, Osbourne. Hello Sara, I have the following questions

General

- SI10-1 Is the approval of the Junipers project limited to the the currently proposed 536 residential units or is there a possibility that the rezoning proposed will allow the developer to increase the number of dwellings, which would perhaps invalidate the EIP?
- SI10-2 Section 5.14-16 & 17 Evacuation.  
  
In the time I have been living in North PQ the area has been threatened directly by fire twice. Both times the fire originated at SW of the area and were driven by onshore winds. Recent evacuations have tended to be block evacuations (say, everything North of highway 56) driven by Santa Ana fires to the north of the area. Appendix K4 seems to not be available with the report.  
  
The report states the existing estimate for the Glens evacuation is 8.3 hours, and the assumption is that this is satisfactory. Can you please explain the math behind how the evacuation of the Junipers is estimated at 3.5 hours when the majority of traffic has to rely on Penasquitos Drive and only additional exit is through Andorra Way? How does this impact the evacuation time for the Glens?
- SI10-3 Section 6.2.2 Transportation/Circulation  
  
All of us in Northern PQ depend on Carmel Mountain Road for access. I did not see anything in this section that assesses the impact of existing projects, such as Cresta Bella and Pacific Villages on the estimated evacuation times. How would the EIP drive a requirement to have this reassessed?
- SI10-4 Section 6.2.2 Transportation/Circulation  
  
Carmel Mountain Road is the major access/limitation for Northern PQ. There has been essentially no changes to this (with the exception of traffic lights) with the additional developments in this area, being Casa Bella & Pacific Villages. This EIP deals with the Junipers, and yet we have Millennium PQ in the wings, so what please is the mechanism to engage more than a sequential project by project assessment?
- SI10-5 Section 6.2.2 Transportation/Circulation

- SI10-1 Yes, the project is limited to the currently proposed 536 residential units. To ensure that additional units would not be built as a matter of right, the project proposes a Community Plan Implementation Overlay Zone (CPIOZ). Please refer to Response to Comment 16 from Haight (Letter SI3A).
- SI10-2 Comments noted. Appendix K4 was posted for public review with the Draft EIR on the City website. This is documented by the fact that specific comments were received on the technical report from others, who had reviewed it from the website. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding emergency evacuation and access improvements.
- SI10-3 The Evacuation Plan was prepared voluntarily by the project applicant specifically to address concerns within the Glens community, and to demonstrate that the project would add evacuation routes and would result in a reduction in evacuation times for the studied scenarios. It is not the project's responsibility to prepare a community wide or regional evacuation plan. Trips associated with Cresta Bella were considered to be within the existing Glens community (see Table 2 of the Evacuation Plan, Appendix K4 to the EIR for a complete listing of existing uses included).

## COMMENTS

## RESPONSES

- SI10-4 The Draft EIR addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Cumulative analysis evaluations (see EIR Section 6.0, *Cumulative Impacts*) expressly included Pacific Village, as well as the Merge 56 and The Preserve at Torrey Highlands. Cresta Bella units were not included as a cumulative project addition because that project was already largely constructed at the time of the project Notice of Preparation (April 2018) and the traffic generated by those units constituted part of the existing traffic condition on area streets, as documented in the project EIR. Regarding Millennium PQ please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.
- SI10-5 EIR Table 5.2-10 shows that the Carmel Mountain Road segment between I-15 southbound ramps and the future project entrance (Segment 3) as well as the segment from the future project entrance to Peñasquitos Drive (Segment 4), would operate at acceptable levels of service even under Horizon Year (2050) Plus Project conditions. As such, the potential for required redevelopment of the Carmel Mountain Road/I-15 southbound ramp junction is currently speculative and not probable/foreseeable. Additional analysis is not required.

## COMMENTS

## RESPONSES

SI10-5 cont. What happens when the junction between I15 South and Carmel Mountain Road needs development?. It is already a complex and busy junction which will only get worse with the homes being built and additions planned. The proposed Junipers plan would not allow for re- purposing land for this.

SI10-6 Section 6.2.2 Transportation/Circulation  
The EIP deals with I did not see anything in this section that assesses the impact of existing projects, such as Cresta Bella and Pacific Villages on the estimated evacuation times. How would the EIP drive a requirement to have this reassessed?

SI10-7 Section 6.2.2 Transportation/Circulation  
The proposed entry into the Junipers from Carmel Mountain Road south (west) appears an afterthought to mitigate to additional traffic impact in Penasquitos Drive, and is likely to impact traffic flow on Carmel Mountain Road south. Have alternative entry/exit alternatives been assessed?

Regards, Tim Clayton

SI10-6 Adopted regional emergency response and evacuation plans are provided in the 2014 Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP). Please refer to Response to Comment 3 of this letter relative to inclusion of specific areas in the Evacuation Plan, and adequacy of the report. Because the project would improve the existing conditions, reassessment is not required.

SI10-7 The primary project entrance/exit would be from the Peñasquitos Drive/Janal Way location, as described in Section 3.3.1.6. The secondary proposed entry into the project from Carmel Mountain Road (also described in Section 3.3.1.6) is part of project design. As shown on EIR Table 5.2-6, Carmel Mountain Road with the project would operate at Level of Service (LOS) C between I-15 and Peñasquitos Drive. This is an acceptable LOS, and does not trigger the need to evaluate alternative entry/exit locations.

## COMMENTS

## RESPONSES

**From:** [Kymberli Clement](#)  
**To:** [DSD FAS](#)  
**Cc:** [Councilmember Mark Kersey](#); [Rodolfo, Kyle](#)  
**Subject:** Junipers - #586670  
**Date:** Wednesday, March 04, 2020 8:33:21 AM  
**Attachments:** [image001.png](#)  
[Kymberli Clement EIR support letter.pdf](#)

---

Good morning,

Please find attached a letter in support of the Junipers project in response to the review of the EIR.  
Thank you for incorporating my support into your overall project review. We appreciate all the hard work you are doing for the city of San Diego.

Best,

Kymberli Clement

Kymberli Clement

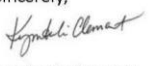
+1, 619.723.7369

[kc@kcdesigndev.com](mailto:kc@kcdesigndev.com)



## COMMENTS

## RESPONSES

<p>March 4, 2020</p> <p>Email to <a href="mailto:dsdeas@sanidiego.gov">dsdeas@sanidiego.gov</a></p> <p>CC: <a href="mailto:MarkKersey@sanidiego.gov">MarkKersey@sanidiego.gov</a>; <a href="mailto:KRodenbo@sanidiego.gov">KRodenbo@sanidiego.gov</a></p> <p>Subject: Junipers - #586670</p> <p>Attn. Sara Osborn:</p>	
<p>SI11-1 For years, we in the Glens neighborhood have been living with the uncertainty of what would happen to the golf course. We've seen developers come and go with very little regard for what makes this neighborhood special. I'm writing to share my support because The Junipers maintains the spirit of our Community Plan by incorporating project features that align with what we love most about the Glens.</p> <p>While reading a 600-page document isn't high on my to do list, I felt it was important to provide a formal comment letter to counter potentially negative letters that might trickle in.</p>	<p>SI11-1 The commenter's support for the project is noted. The comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require response.</p>
<p>SI11-2 As section 4 demonstrates, the plans have evolved over the last couple years. I've participated in the community outreach process since it started in fall of 2017. I've shared my concerns, ideas and feedback and can see my comments reflected in the plans outlined in this EIR. Prior to submitting an application, the developers conducted nearly a year of outreach to determine the best use. Based on our comments about traffic and school impacts, an age-qualified community was presented. Feedback about the importance of trails and community benefits further influenced the plan which now includes public trails and a new neighborhood park. During the park planning workshops, our disappointment about the loss of the hotel tennis courts lead to the incorporation of public tennis and pickle ball courts. You can't make everyone happy, but they have tried.</p>	<p>SI11-2 The commenter's support for the project is noted. The comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require response.</p>
<p>SI11-3 The biggest concern my neighbors and I shared was regarding evacuation. In response, two presentations at the local Planning Board meeting were done to review the results of the technical studies related to this important issue. I appreciate the project team taking the time to review the report findings and the details of the additional evacuation options provided for our neighborhood through The Junipers. I'm happy to be able to finally read the reports for myself as part of this Impact Report.</p>	<p>SI11-3 Comments noted. This comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.</p>
<p>SI11-4 From landscaping to architecture, to maximizing setbacks and maintaining views, The Junipers addresses the concerns shared by this community. We are a passionate bunch and the developer has been transparent and consistent in their commitment to responding to us.</p> <p>I have included Councilman Kersey's office on this email as I hope he will consider approving The Junipers when it is time for him to vote later this year.</p> <p>Sincerely,</p>  <p>Kymberli Clement 11203 Linares St., San Diego, CA 92129</p>	<p>SI11-4 Comments noted. This comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.</p>



## COMMENTS

## RESPONSES

**From:** [Kathy Coffelt](#)  
**To:** [DSD EAS](#)  
**Cc:** [Darrell Coffelt](#)  
**Subject:** [EXTERNAL] Junipers EIR  
**Date:** Thursday, April 02, 2020 6:34:54 PM

SI12-1

I'm writing in reference to the proposed development of the Junipers Project. My questions are specifically in regards to the EIR Part 4 of page 5.14-16. The last line of this page reads "the evacuation travel timeframe for the Glen's community is estimated at 8.3 hours once notification has been provided".

Would you please explain how my family is to survive for 8.3 hours if in fact our neighborhood is on fire and we've just been notified?

Also, could you please explain how added several more traffic obstacles, traffic circles and a traffic light will improve the response time of emergency vehicles into our neighborhood (see statement, same page, 2 paragraphs earlier)?

I appreciate your consideration and look forward to your response.

Kathryn Coffelt  
11413 Meknes Way  
San Diego, CA 92129

SI12-1 The cited 8.3 hours represents the estimated maximum evacuation time for the Glens community following notification is the existing condition, without the proposed project. This assumes all vehicles would need to travel along segments of Peñasquitos Drive and Carmel Mountain Road. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements, with project implementation, that would reduce the evacuation timeframe for the Glens community to as low as 3.5 hours following notification.

## COMMENTS

## RESPONSES

<p>March 9, 2020</p> <p>Sara Osborn City of San Diego Development Services Department</p> <p>RE: Draft EIR Junipers Project #586670</p>	
<p>SI13-1 My comments are regarding the Fire Evacuation Plan of the Junipers Project. The Draft EIR concludes that this Project would result in less than significant environmental impacts with implementation of mitigation measures with regard to Transportation/Circulation. The Draft EIR also stated that all other impacts analyzed in the EIR were found to be less than significant.</p>	
<p>SI13-2 Although this Draft EIR looks good on paper, the Junipers Project in reality will result in serious safety issues for the Glens Community. I shall point out several issues regarding how the Glens Community will be at a significant risk should a fire occur.</p> <p>A. The existing emergency access/egress roads between Andorra Way and Corte Raposo and the new emergency only egress right-out lane from the Junipers Project onto Carmel Mountain Road do not meet the following codes in that both exceed Slope/Grade maximum of 16% (See ATT 1, 2, and 3).</p> <ul style="list-style-type: none"> <li>California Fire Code (CFC) and California Vehicle Code (CVC), dated 10/5/2009. These Codes set the Minimum Clear Width at 20', Minimum Clear Height at 13'6", and the Grade/Slope of fire apparatus access roads not to exceed 10% - 15% (See Link <a href="http://www.unidocs.org/fire/un-096.pdf">http://www.unidocs.org/fire/un-096.pdf</a>). (See ATT 4 and 5).</li> <li>FEMA P-737 dated 9/2008. This Code states Minimum Width at 20' for access roads. The Minimum Height at 13'6". The Maximum grade of roads not to exceed a grade of 16% (See Link <a href="https://www.fema.gov/media-library-data/20130726-1652-20490-4085/fema_p_737.pdf">https://www.fema.gov/media-library-data/20130726-1652-20490-4085/fema_p_737.pdf</a>). (See ATT 6).</li> </ul> <p>Unless there is a more current version of these Codes (I cannot find any), these access/egresses are not in compliance with regard to Slope/Grade maximum.</p>	<p>SI13-1 Comments noted. Please note that Section 5.2 of the EIR found that impacts to Transportation/Circulation would be less than significant with implementation of the identified traffic signal and roundabout as project mitigation. The Transportation/Circulation section of the EIR primarily focuses on routine vehicular activity on surface streets. The EIR does not find evacuation plan impacts to be less than significant based on these Transportation/Circulation mitigation measures. Project implementation would result in improvement in evacuation routes, as analyzed in Section 5.14, <i>Health and Safety</i>, and discussed in further detail in the Response to Comment 1 from Derbique (Letter SI4).</p> <p>SI13-2 The emergency access route width, grade, or vegetation clearance are detailed in EIR Sections 3.3.1.6 and 5.14.4.2, as well as the Wildland Fire Evacuation Plan and Fire Protection Plan in EIR Appendices K4 and K5, respectively. Project design and implementation would be consistent with Chapter 14 of the San Diego Municipal Code regarding fire safe design and hazard management. Attachments 1, 2 and 3 of the comment letter provide existing conditions information, and do not relate to post-project conditions (again, please refer to the Response to Comment 1 from Derbique [Letter SI4]). Similarly, Attachment 4 relates to Santa Clara County and is not relevant to construction in San Diego.</p> <p>All project roads, including the emergency access upgrades, are designed to meet the City's Fire Code. As shown on Attachment 8 of the comment letter (Figure 3-13 of the EIR), emergency access would be 20 feet in width (also cited as a necessary width by FEMA in Attachment 6 of the comment letter), and</p>
<p>SI13-3 B. Lennar never even evaluated the great risk of Andorra Way access/egress by doing an assessment on the approximate 100' drop-off on the East side which has about 30% slope right down to the apartments below (See ATT 7 and 8).</p> <p>SI13-4 C. Lennar plans to construct a 15' Radio-Frequency gates controlled by SDFD. On the North and South end of this Andorra Way access/egress road, there would be a 15' gate, then a bollard, then a 5' Pedestrian Way, then another bollard. Although there is a 20' wide road, there still remains 2 bollards with locks at each end of this road that someone needs to remove and hopefully they will not be rusted closed like the existing bollards that are there now. Who will unlock them? Will they do them in time? We still have the same existing problems with the new bollards - The solution would be to construct a 20' gate, opening in the middle (10' for each</p>	

## COMMENTS

## RESPONSES

	<p>SI13-2 (cont.) vegetation clearing to code requirements would be provided not only vertically to avoid interference with fire engines/apparatus, but also extending 10 feet on either side of the route in areas that are currently overgrown. The road grades on these emergency access connections would not exceed 15 percent, which is consistent with City requirements and California Fire Code Section 15.14.10, Section 502.2.7-Grade as highlighted in Attachment 5 of the letter. Because the connection to Andorra Way would meet each of the relevant criteria, the off-road slope shown in Attachment 7 and annotated on Attachment 8 by the commenter is immaterial. Attachment 9 of the comment letter consists of proposed gate and bollard improvements as shown on Figure 11 of the evacuation plan and accurately depicts proposed improvements. Attachment 10 of the comment letter consists of Draft EIR Figure 3-9a, with annotations by the commenter. Attachment 11 consists of Draft EIR Figure 3-12a, also with annotations by the commenter. The project design does not include a connection from the proposed apartments to Private Driveway "A."</p> <p>The access/egress points to/from the project are in compliance with relevant grade maxima, as described above.</p>
	<p>SI13-3 As described in Response to Comment 2 of this letter, evaluation of the downslope grade is not relevant to the emergency access connection. The access/egress points to/from the project will be implemented in compliance with relevant grade standards</p>
	<p>SI13-4 <b>Topical Response – Andorra Way Emergency Operations/ Maintenance.</b> Comments noted. The planned gate and bollard (see EIR Figure 3-13) have been approved by the City Fire Marshal. During an emergency, fire officials or law enforcement would open the gate and remove the bollards.</p>

SI13-4 (cont.) Gate replacement is the responsibility of the project's HOA, as provided on "Notes" following Figure 9 of the Evacuation Plan. Also, the following text is on page 52 of the Evacuation Plan in Appendix K4 of the EIR. These improvements will become conditions of project approval.

*Maintenance is an important component for the long term reliability of the northern fire access route. Appendix C includes Emergency Fire Access Road details including property ownership, which facilitates ongoing Junipers HOA vegetation maintenance activities along the emergency Fire Access Road. Maintenance obligations will be as follows:*

***City of San Diego:***

*Maintenance of access road and landscape vegetation*

*Maintenance of gate* [for clarification, the bollard is considered part of the gate]

***Junipers HOA:***

*Financial reserve for repair of access road and gate*

*Quarterly landscape vegetation management* [for clarification, the bollard is considered part of the gate]

As stated in Section 5.14.4 of the EIR and in the Response to Comment 1 from Derbique (SI4), the community would be expected to benefit from the additional evacuation routes and reduced evacuation time that would result with implementation of the project, because the project would provide two additional evacuation routes for use by the community. The analysis in Section 5.14.4 of the EIR, shows that with implementation of the additional evacuation routes, the evacuation time for the community would be improved from the existing condition of up to 8.3 hours to as little as 3.5 hours.

## COMMENTS

## RESPONSES

SI13-4  
cont.

evacuation options when included and implemented with the Junipers would reduce evacuation time by roughly 44%. Just based on the increase of residences of Millennium PQ and the Junipers (867 total residences), this 44% decrease is impossible. It would increase the evacuation times.

SI13-5

Based on all of the above issues, I have proven that this Fire Evacuation is seriously flawed. In fact, there would be traffic delays, a "choke-hold" on Penasquitos Drive, traffic deadlock on Carmel Mountain Road, and a disastrous situation in the event of a fire causing deaths. For these reasons, the Junipers Fire Evacuation Plan should be voided and a new Fire Evacuation Plan prepared taking into consideration all of the above serious issues. It is suggested that a Fire Protection Plan Consultant be hired by the City and not Lennar so an unbiased Fire Evacuation Plan can be evaluated.



Shari Collins  
(858) 527-5197

- ATT 1 Andorra Way Access/Egress Road (looking towards the North)
- ATT 2 Andorra Way Access/Egress Road (Looking towards the South)
- ATT 3 The new Junipers Access/Egress Road (projected location) from the Junipers Project to Carmel Mountain Road
- ATT 4 Standards for Fire Department Vehicle Access per California Fire Code (CFC) and California Vehicle Code (CVC).
- ATT 5 California Fire Code, Chapter 15.14
- ATT 6 FEMA's Home Builder's Guide to Construction in Wildfire Zones, Community Infrastructure
- ATT 7 Andorra Way Access / Egress Road (Drop-off on East side)
- ATT 8 Andorra Way Emergency Access Road
- ATT 9 Andorra Way - Proposed Improvements
- ATT 10 Project Site Connectivity Map
- ATT 11 Project Internal Street Layout and Connections to Off-Site Roads

SI13-4 (cont.) The analysis (see EIR Section 5.14.4) shows the project would reduce current evacuation time by up to 4.8 hours, with the project's population added to existing residents. Please note that the estimated population and number of evacuating vehicles were revised upward following a June 2019 Rancho Peñasquitos Planning Board presentation by the applicant in response to Board request. The project would not result in significant impacts and would provide a benefit.

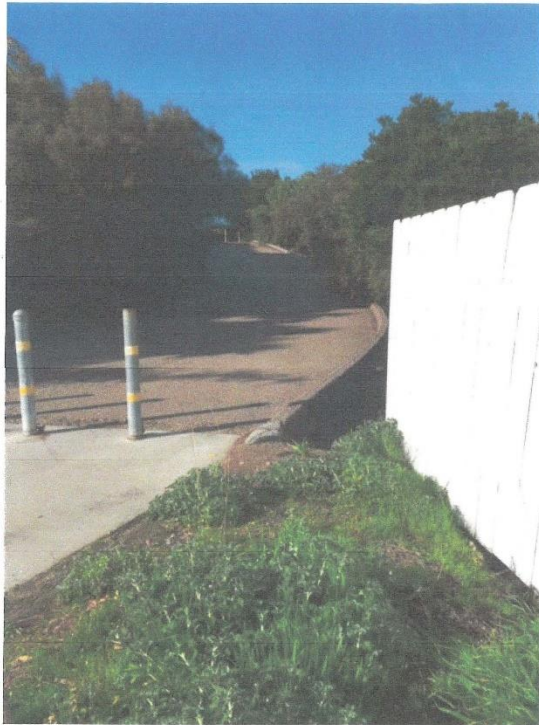
SI13-5 The Evacuation Plan was prepared by a qualified technical specialist and reviewed by City staff. Please refer to Responses to Comments 2 and 4 above regarding evacuation function.



COMMENTS

RESPONSES

ATT /

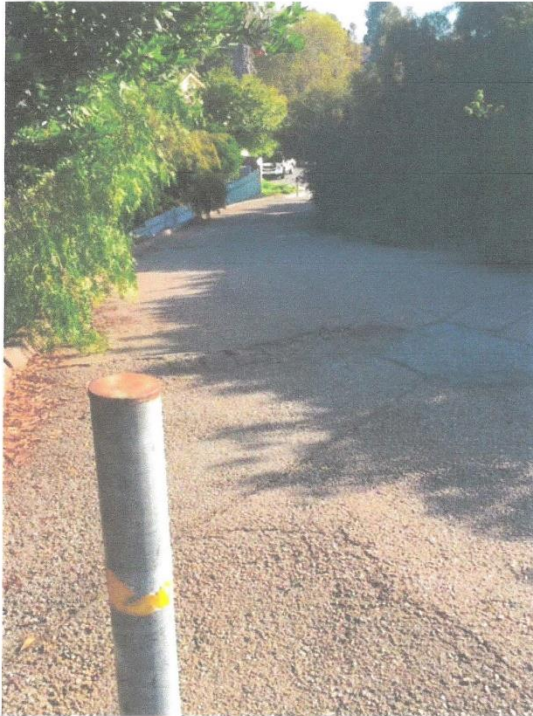


Andorra Way Access/Egress Road  
(looking towards the North)

COMMENTS

RESPONSES

ATT 2

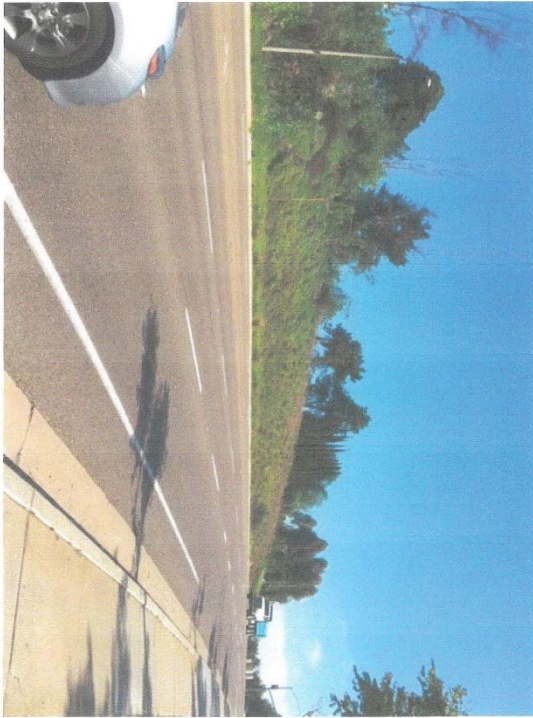


Andorra Way Access/Egress Road  
(looking towards the South)

COMMENTS

RESPONSES

ATT 3



The New Juniper's Access/Egress Road (Projected Location) from the Junipers Project to Carmel Mountain Road

ATT 4

**STANDARDS FOR FIRE DEPARTMENT VEHICLE ACCESS***For Use By All Jurisdictions, Cities and County, Within the Limits of Santa Clara County.**Authority Cited: California Fire Code (CFC), California Vehicle Code (CVC)*

The following standard identifies the requirements for Fire Department vehicle access. Where noted, contact the local fire agency for further information and approval.

1. **Access and Loading.** Facilities, buildings, or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved fire apparatus access road with an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus weighing at least 75,000 pounds (34,050 kg) or as otherwise determined by the Fire Code official.

2. **Minimum Clear Width.** The minimum clear width of fire department access roads shall be 20 feet (6,096 mm). This width may be increased based upon specific department operations and/or apparatus. Alternate designs may be approved on a case-by-case basis.

Modifications to the configuration or width of a fire access road, or additional access road(s) may be required when the Fire Code official determines that access to the site or a portion thereof may become compromised due to emergency operations or nearby natural or manmade hazards (e.g., flood prone areas, railway crossings, bridge failures, hazardous material-related incidents, etc.).

The width of secondary access roads may be reduced to less than 20 feet (6,096 mm) provided that turnouts are installed adjacent to the roadway every 500 feet, with a minimum dimension of 10 feet (3,048 mm) wide and 40 feet (12,192 mm) long or as otherwise determined by the Fire Code official.

3. **Minimum Clear Height.** Minimum vertical clearance over required vehicular access roads and driveways shall be 13'6" (4,115 mm).

- \* 4. **Grade.** Fire apparatus access roads shall not exceed 10% in grade, unless approval is granted by the Fire Code official prior to construction.

5. **Turning Radius.** The minimum turning radius shall be determined by the Fire Code official.

6. **Dead Ends.** Dead-end fire apparatus access roads in excess of 150 feet (45,720 mm) shall be provided with width and turnaround provisions as determined by the Fire Code official.

7. **Parking.** When parking is permitted on streets, in both residential/commercial applications, it shall conform to the following:

- a. Parking is permitted on both sides of the street with street widths of 36 feet (10,973 mm) or more.
- b. Parking is permitted on one side of the street with street widths of 28 to 35 feet (8,534 to 10,668 mm).
- c. No parking is permitted when street widths are less than 28 feet (8,534 mm).

*[Note: Rolled curbs can be part of the curb/sidewalk and used to increase the roadway width with approval from the Fire Code official. Additional requirements may apply for buildings 30 feet (9,144 mm) in height or greater. See requirements under item 19 (Aerial Fire Apparatus Access Roads).]*

**14. Fire Apparatus Access Roadway Signs.** Where required by the Fire Code Official, fire apparatus access roads shall be designated and marked as a fire lane as set forth in CVC §22500.1. The designation shall be indicated by:

- a. A sign posted immediately adjacent to and visible from the designated place, clearly stating in letters not less than one inch in height that the place is a fire lane; or
- b. Outlining or painting the place in red and, in contrasting color, marking the place with the words "FIRE LANE," which are clearly visible from a vehicle; or
- c. A red curb or red paint on the edge of the roadway upon which is clearly marked the words "FIRE LANE."

**15. Commercial and Industrial Developments.**

- a. **Buildings Exceeding Three Stories or 30 Feet (9,144 mm) in Height:** Buildings or facilities shall have at least two means of fire apparatus access for each structure.
- b. **Buildings Exceeding 62,000 Square Feet (5,760 Square Meters) Gross Building Area:** Buildings or facilities shall be provided with two separate and approved fire apparatus access roads.

*[Exception: Projects having a gross building area of up to 124,000 ft<sup>2</sup> (11,520 m<sup>2</sup>) may have a single approved fire apparatus access road when all buildings are equipped throughout with approved automatic sprinkler systems.]*

**16. Multi-Family Residential Developments (R-1 and R-2 Occupancies) Having More Than 100 Dwelling Units.** Developments shall be equipped throughout with two separate and approved fire apparatus access roads.

**17. One-or-Two Family Residential Developments.** Developments of one or two family dwellings where the number of dwelling units exceeds 30 shall be provided with two separate and approved fire apparatus access roads and shall meet the requirements listed under item 13 (Separation of Access Roads).

*[Exception: When approved by the Fire Code official, where there are more than 30 dwellings units on a single public or private fire apparatus road and all dwellings units are equipped throughout with an approved automatic sprinkler system in accordance with California Fire Code §903.3.1.1, 903.3.1.2 or 903.3.1.3, access from two directions shall not be required.]*

The number of dwelling units on a single fire apparatus access road shall not be increased unless fire apparatus access roads will connect with future development, as determined by the Fire Code official.

**18. Secondary Access Roads**

- a. **Connection To Other Roads:** Where a secondary access roadway connects to a public or private street there shall be either: no curb; a rolled curb; or a driveway cut as approved by the Fire Code official.
- b. **Maintenance:** Secondary access roadways shall be maintained at all times by the property owner. The roadway surface gates/locks and vertical and horizontal clearances shall be maintained in serviceable condition. Maintenance of secondary access roadways on commonly held lands shall be clearly stated in the Covenant, Conditions, and Restrictions (CC&R) or Landscape Maintenance agreements of the development project. The CC&Rs shall mandate that the owners association shall retain professional management to oversee maintenance responsibilities.



3/7/2020

Chapter 15.14 CALIFORNIA FIRE CODE

ATT 5

## Chapter 15.14 CALIFORNIA FIRE CODE

### Sections:

- 15.14.010 Adoption and citation.
- 15.14.020 Section 101.1, Division II—Title.
- 15.14.030 Section 102.3—Change of use or occupancy.
- 15.14.040 Section 102.7.3—Supplemental rules, regulations and standards.
- 15.14.050 Section 104.3—Right of entry.
- 15.14.060 Section 104.11.4—Charges.
- 15.14.070 Section 105.2—Application for permit—Fees.
- 15.14.080 Section 109.4—Violation—Penalties.
- 15.14.090 Section 111.4—Failure to comply.
- 15.14.100 Section 202—Definitions.
- 15.14.110 Section 202—Definitions—Tent.
- 15.14.120 Section 401.3.2.1—Unwarranted alarm notification.
- 15.14.130 Section 402.1—Definitions.
- 15.14.140 Section 503.1.1—Building and facilities.

<https://www.codepublishing.com/CA/Cloverdale/html/Cloverdale15/Cloverdale1514.html#15.14.210>

1/63

3/7/2020

Chapter 15.14 CALIFORNIA FIRE CODE

engineering or a California licensed structural engineer, for the purposes of safety and weight rating, in accordance with American Association of State Highway and Transportation Officials (AASHTO) Manual: "The Manual for Bridge Evaluation", Second Edition, or other approved standard. Vehicle load limits shall be posted at both entrances to bridges. All bridges and elevated structures providing fire department access shall be routinely maintained in accordance with Section 503.2.6 or when directed by the Fire Code Official or authorized designee.

(Ord. 712-2016 § 4 (part), 2016)

**15.14.200 Section 503.2.6.2—Bridge maintenance.**

Section 503.2.6.2 is added to read as follows:

All new and existing private bridges and elevated structures providing emergency access shall be routinely evaluated and maintained in accordance with the American Association of State Highway and Transportation Officials (AASHTO) Manual: "The Manual for Bridge Evaluation," Second Edition, 2011, published by the American Association of State Highway and Transportation Officials or other approved standard.

(Ord. 712-2016 § 4 (part), 2016)

**\*15.14.210 Section 503.2.7—Grade.**

Section 503.2.7 is amended to read as follows:

No road or driveway shall have a maximum grade in excess of fifteen percent (15%) unless approved by the Fire Code Official, which may require additional fire protection measures. To accommodate unusual access constraints, a road or driveway may include grades up to 20% for distances not exceeding three hundred (300) feet.

(Ord. 712-2016 § 4 (part), 2016)

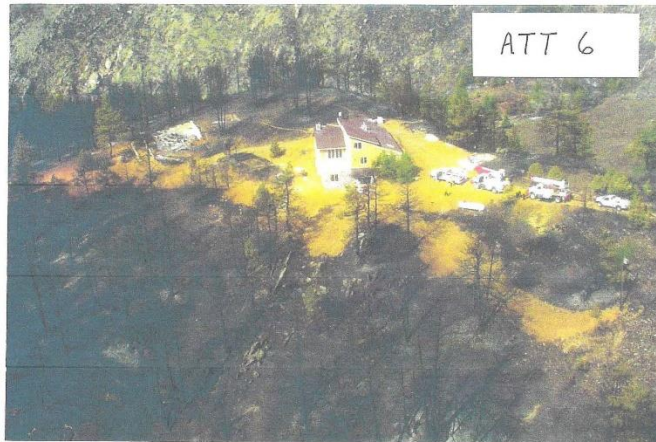
**15.14.220 Section 503.4—Obstruction of fire apparatus access roads.**

Section 503.4 is amended to read as follows:

Fire apparatus access roads shall not be obstructed in any manner, including the parking of vehicles. The minimum widths and clearances as established in Section 503.2.1 and 503.2.2 shall be maintained at all times. Vehicles found to be parked in public and private areas identified as Fire Lanes, Hydrant Zones, or any other fire department access way

<https://www.codedpublishing.com/CA/Cloverdale/cfhtml/Cloverdale15/Cloverdale1514.html#15.14.210>

18/63



## Home Builder's Guide to Construction in Wildfire Zones

Technical Fact Sheet Series

FEMA P-737 / September 2008



Federal Emergency Management Agency  
U.S. Department of Homeland Security  
500 C Street, Southwest  
Washington, DC 20472

# Community Infrastructure



Home Builder's Guide to Construction in Wildfire Zones

Technical Fact Sheet No. 17

## Purpose

To provide guidance about neighborhood and community-wide fire-safe practices that will enhance fire protection in wildfire zones. Guidance pertains to community infrastructure, including roads used for evacuation routes and emergency access, and emergency water supply. Although a home builder may not have control over these elements, community officials and homeowners should be aware of measures that can be taken on a community-wide basis to increase the chances of an entire neighborhood's survival in a wildfire.

## Background

- Poorly designed or inadequate infrastructure can hamper fire-suppression efforts and put citizens and firefighters at risk. Reducing the risk of wildfire damage and destruction requires implementing measures beyond those involving an individual building or parcel. It is also essential to enhance mitigation measures at the neighborhood and community levels, which will effectively expand the zone of protection beyond the individual parcel or building.
- The local fire agency, state forestry or natural resources departments, the local office of emergency management, or other local organizations should be contacted to obtain information about the hazards and risks in an area.

## Key Issues

- Emergency response vehicles may need to access a wildfire area at the same time evacuation traffic is leaving the area. Firefighters need safe access along roads to reach the wildfire and access water resources.
- Visible street signs and property addresses provide firefighters with critical response and location information. Property addresses are often not visible, and a road name may occur more than once in a jurisdiction.
- Wildland fuels and landscape vegetation along roads can place firefighters in extremely hazardous situations.
- Water resources for wildfire suppression are vital and need to be accessible.

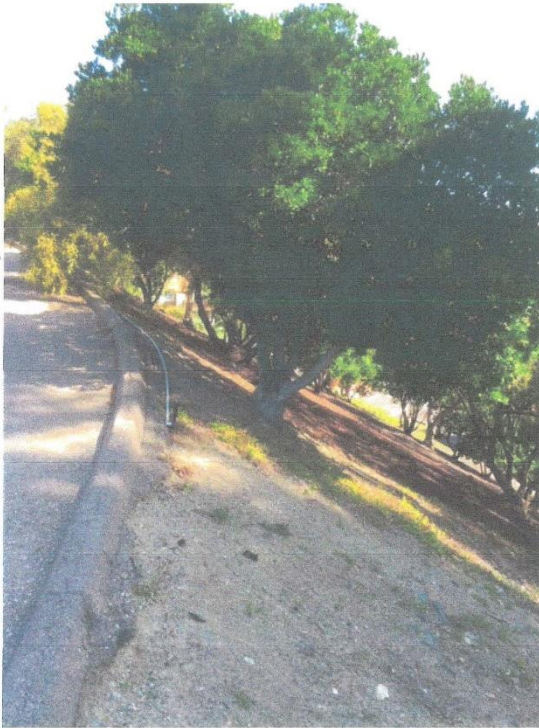
## Guidance for Roads and Driveways

- Roads should be wide enough to allow evacuation and emergency vehicles simultaneous access. Minimum width is 20 feet for access roads and 12 feet for driveways (see Figure 1).

COMMENTS

RESPONSES

ATT 7

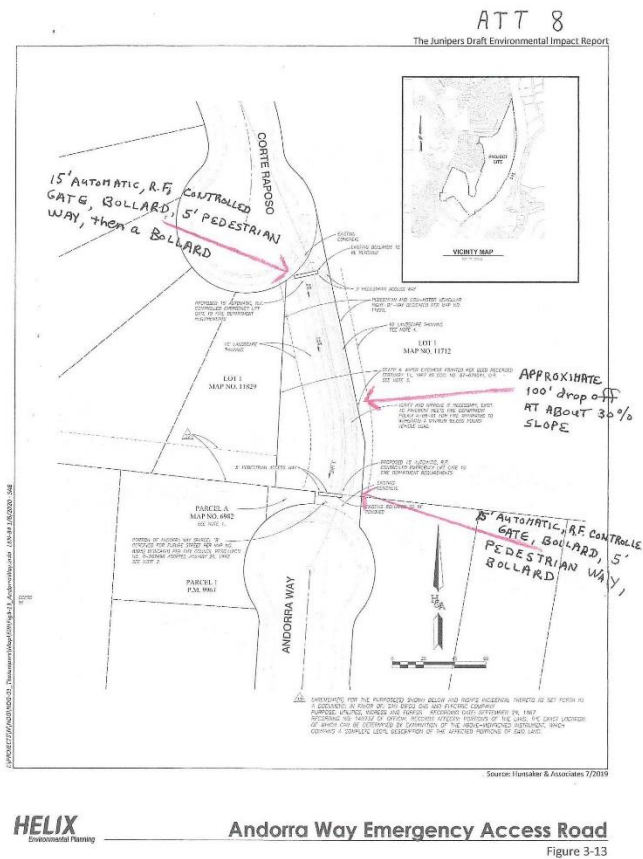


Andorra Way Access/Egress Road  
(Drop off on East Side)



COMMENTS

RESPONSES



COMMENTS

## RESPONSES

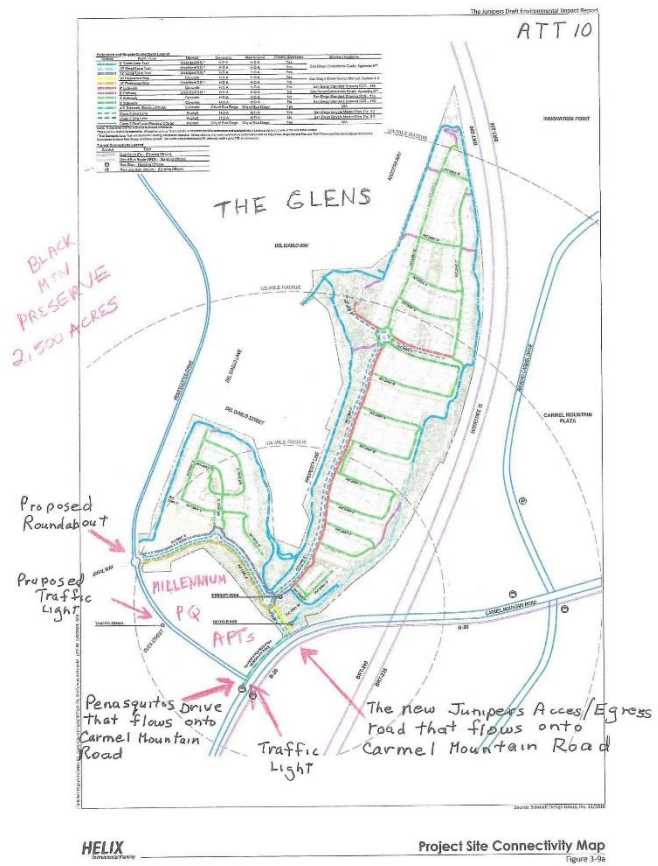
ATT 9



## Andorra Way-Proposed Improvements

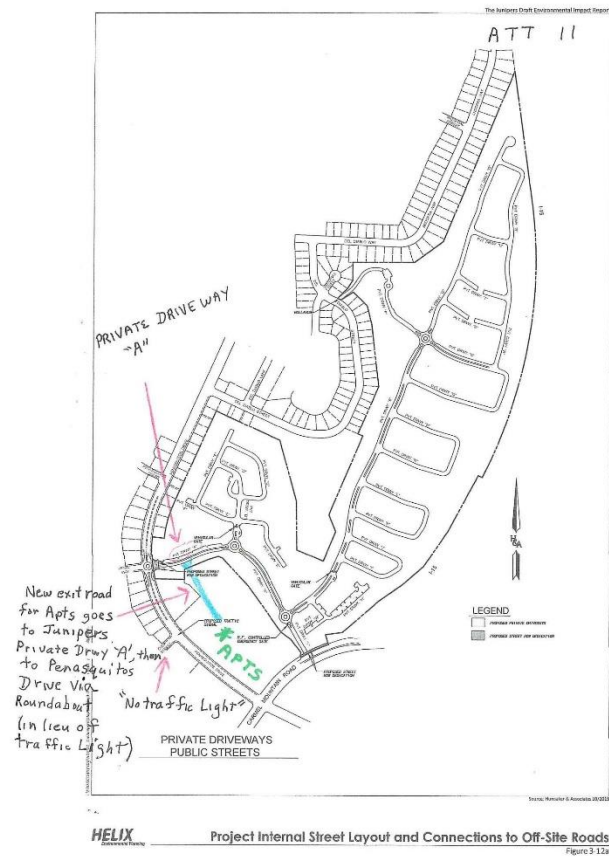
COMMENTS

RESPONSES



COMMENTS

RESPONSES



## COMMENTS

## RESPONSES

**From:** Pam Bane  
**To:** DSD\_EAS  
**Subject:** [EXTERNAL] The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 3:03:33 PM

Dear Ms. Osborn,

I appreciate the opportunity to comment on the Draft Environmental Impact Report for The Junipers, Project No. 586670/SCH No. 2018041032.

SI14-1

The Junipers Project significantly affects the current residents of the Glens neighborhood of Rancho Penasquitos. The Rancho Penasquitos Community Plan, updated March 2004, and posted with amendments in June 2005, pg. 37, Table 3, Neighborhood Planning Areas; Recommended Land Use, shows for the Glens: Single Family Detached Units: 1,229 and Multi-Family Attached Units: 291. This totals 1,520. On pg. 39 of the same document, the Glens neighborhood is said to contain 1,505 dwelling units. In 2011, a few low-density units were replaced with Cresta Bella containing 368 units. At least 11 newer units have also been constructed in the Almazon/ Paymogo streets area. This puts the total number of dwelling units significantly over the Recommended Land Use for the Glens by the Rancho Penasquitos Community Plan. The proposed Junipers would add 536 residential units, bringing the total units to at least 2, 437, over 900 units more than the 2004/2005 Community Plan recommends. Will the planners please address this overdevelopment issue?

SI14-2

While I am very pleased to read in Section 5.2.2.4 that under mitigated conditions, and Horizon Year 2050, that queuing at TRA-1 And TRA-2 is not expected to affect the operations of any upstream intersection, I have a question:

Considering that due to the 2020 economy, with many adult children returning to their parents' homes, and still commuting to jobs through these intersections, has an "Existing Plus Project" impact been calculated in relation to this current situation? Will the planners please address this concern, that the queuing at TRA-1 and TRA-2 will actually be LONGER at "Existing Plus Project" than at "Horizon Year Plus Project" scenarios?

SI14-3

I appreciate that in Section 5.5-11, that analysis has been accomplished of Vehicle Operational Emissions, and that vehicular queuing at TRA-1 And TRA-2, in relation to greenhouse gasses will have impacts of "less than significant." In the Environmental Impact Report for The Junipers, Project No. 586670/SCH No. 2018041032, I think it would be useful information to all interested parties in this project to be reminded that the near-future traffic scenarios include a higher percentage of electric vehicles, therefore reducing total vehicle traffic emissions in the project area. Will you please include this in the final document?

SI14-4

I have carefully studied the overhead diagram of the Roundabout Improvements, Figure 3.12-e. I have discovered that the mini-circles installed on Cassia Road in Carlsbad in 2016 (KGTV-May 25, 2018-www.10news.com) have been removed because they were too small to be effective. I have also observed the successful traffic calming roundabouts on La Jolla Boulevard in the Bird Rock neighborhood of La Jolla, and believe them to be similar to the Roundabout Improvements, Figure 3.12-e. Will the planners please provide a side-view diagram of the proposed Janal Way/ Penasquitos Drive traffic calming roundabout?

SI14-5

Overall, I am very pleased with all of the work that the planners and engineers have put into this Draft EIR. Thank you.

SI14-1 The EIR evaluates the potential impacts of implementing the project, which includes construction of the proposed 536 units, as well as implementation of the proposed amendments to the Rancho Peñasquitos Community Plan (RPCP). From a land use plan analysis perspective, the EIR addresses project-related modifications to the adopted RPCP as last amended and adopted by the City Council in April 2011. As addressed in EIR Section 3.0, *Project Description*, and Section 5.1, *Land Use*, portions of the RPCP would be modified relative to on-site land use designations, Glens population, park provision, and changes to open space.

Furthermore, the project would formally designate the proposed park and open space areas for these uses to limit the development area of the site and provide assurance that a larger development could not be implemented without further environmental review. Please refer to Response to Comment 7 from DeLano (Letter SI3) regarding the Community Plan Amendment process. Please refer to the response to Comment 5 from Haight (Letter SI3A) regarding intensity of site utilization, and to Response to Comment 16 of that same letter regarding zoning that could require new evaluation if a future owner were to propose additional uses.

Please note that for other issues, the existing conditions are based on actual measured conditions, such as traffic, noise, and emergency evacuation.



## COMMENTS

## RESPONSES

	<p>SI14-2 It is not required that the project address economic changes that may occur over time that may cause a change to regional traffic. The SANDAG models upon which the regional traffic forecasts are based are updated frequently and reflect changing population densities, household sizes, and transportation usage patterns over time. Regardless, the project is an age-qualified development that would not permit family members below the age of 55 to reside in the development, with rare exceptions. As such, these comments do not address adequacy of the Draft EIR and do not require response.</p> <p>SI14-3 In general, passage of time always results in a cleaner fleet of vehicles on the road due to turn-over – removal of older vehicles with greater emissions, and replacement with newer vehicles with fewer emissions. If electric vehicles form an increasing percentage of future vehicles, this could additionally reduce vehicular emissions. Consistent with this comment, Section 5.6, <i>Greenhouse Gas Emissions</i>, identifies that the City CAP Strategy 3, part 3, requires a “yes” answer to questions regarding electric vehicle charging stations and pre-wiring.</p> <p>The project would exceed City pre-wiring requirements by providing EV-ready pre-wiring in all 455 market-rate residential garages. The project exceedance of City goals for electric vehicles, as well as the conformance with other City requirements to provide electric vehicle charging stations, is expected to result in increased numbers of electric vehicles, with associated reductions in gasoline-powered vehicle emissions. No revision to the EIR text is necessary.</p> <p>SI14-4 Comment noted. The side view elevation of the Janal Way roundabout is depicted on Figure 3-12e. The remainder of this comment does not address project features or the adequacy or accuracy of analyses in the Draft EIR and does not require response.</p>
--	--

COMMENTS

RESPONSES

Sincerely,  
Pamela L. Bane

SI14-5 Comment noted. This comment supports the adequacy of the EIR and does not require response.

## COMMENTS

## RESPONSES

**From:** Judy Day <judyday@san.rr.com>  
**Sent:** Thursday, February 20, 2020 5:36 PM  
**To:** DSD EAS  
**Subject:** The Junipers / Project Number 586670

To Whom It May Concern,

Safety is the number one issue this community is concerned with. As a home owner living on Janal Way for the last 25 years, we have experienced major fires in this area. Creating 536 more residential units in a space that was designed to be open space is NOT SAFE in cases of emergency. Police, Fire and Emergency vehicle times will be affected as well as evacuation. Additionally, The Karlan Hotel just sold and who knows what is planned for this space, now? The draft EIR conclusions did not take this into account.

SI15-1

Why isn't the safety of the residents who currently live here being taken into account? "Less than significant environmental impacts" were found with regard to Public Safety in the draft EIR. However, this community has already been impacted by the additional units created by Cresta Bella and now the additional units being built on Carmel Mountain Road between Cuca and Penasquitos Drive. There is absolutely significant public safety impact when more and more people are crammed into one small area that is surrounded by natural habitat.

I hope you will take another look at how this community is being impacted in terms of safety and NOT approve this unsafe project.

Sincerely,

Judy Day

SI15-1 Comments noted. As stated in the comment, safety is directly addressed in the EIR, with specific discussion of emergency vehicle access (police and fire) as well as evacuation. Project implementation would result in a reduction in the estimated Glens community evacuation time following notification from up to 8.3 to as few as 3.5 hours, as described in EIR Section 5.14, *Health and Safety*, and in the Response to Comment 1 from Derbique (SI4). Project modeling indicates that existing evacuation time from the Glens community is up to 8.3 hours following notification and this timeframe is driven by the availability of one recognized point of egress. The project would provide additional access through the project property (eliminating need to travel along portions of Peñasquitos Drive and Carmel Mountain Road), as well as provide a reliable connection for existing residents located in the northeast portion of the Glens, as described in the Wildland Fire Evacuation Plan in EIR Appendix K4, the reduction in evacuation time is driven by the post-project condition of three potential points of egress. As a result, project implementation is assessed as improving the existing condition and would improve conditions for the Glens community.

Relative to other projects in the area, the EIR addressed cumulative projects known to the City at the time of issuance of the project Notice of Preparation (NOP) of an EIR on April 10, 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.

## COMMENTS

## RESPONSES

TO SARA OSBORN: RE THE JUNIPERS  
MISS OSBORN

02/26/2020

SI16-1

My wife and I are homeowners  
near the ex-Karin/Douglas Tree Hotel.  
Our concern is over the development  
of the Junipers Project that is making  
our living neighborhood dangerously over-  
crowded, choked with traffic and seriously  
in fire danger.

By adding nearly 1500 more homes  
will make evacuation from here a serious  
problem, if a fire breaks out the last  
serious fire took an hour and a half  
to get to the freeway.

SI16-2

With the proposal of roundabouts  
extra traffic lights and more vehicles, there  
will be chaos and not enough safety  
personnel to direct people where to go.  
It's just a matter of time when people  
could lose their lives because of over-  
crowding.

Please help us and keep the  
developers from adding more homes on  
the once Karin/Douglas Tree Golf course.  
Many lives are at stake here. Thank you.  
Sincerely  
Della Lynn Delgado

SI16-1 This comment does not address the content or conclusions of the EIR and no response is necessary.

SI16-2 The concern over additional residences in the area is noted. Please note that the project would not build 1,500 homes. The project would be restricted to building 536 dwelling units if the project is approved.

The beneficial effects on evacuation for the Glens community overall (including alternate routes and a reduction from up to 8.3 hours after notice to evacuate to as low as 3.5 hours with the project in place) are detailed in EIR Section 5.14, *Health and Safety*, as well as the Wildland Fire Evacuation Plan in EIR Appendix K4. Please also refer to the response to Response to Comment 1 from Derbique (SI4).

Regarding the effectiveness of the traffic signal and roundabout proposed as project mitigation, please refer to the Response to Comment 20 from Haight (Letter SI3A).

## COMMENTS

## RESPONSES

**From:** [Gina Betts](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] The Junipers Project No. 586670  
**Date:** Monday, April 06, 2020 9:33:59 PM

Dear Ms. Osburn,

SI17-1

I am writting to you in regards to the Junipers project in Rancho Penasquitos. I live in the community that will be impacted by this project. I am not against more housing, but I am concerned about the traffic flow out of the neighborhood. In particular, how can this review be considered complete when it does not take into account the Milleninum project? This will surely bring more roadtrips that have not be accounted for.

How can we properly evacuate in an emergency?

SI17-2

Another concern is traffic flow in general. A roundabout that feeds into a traffic, plus the main light at Carmel Mountain was not accounted for with the Milleninum Project. Can we know that this will not cause severe backups during peak travel hours?

SI17-3

Finally, if you take this traffic flow into account during an emergency, including the Millenium project, and feeding out onto Carmel Mountain road with the new Pacific Village (with 1,000 residents), I don't see how our community can possibly evacuate safely.

Thank you for your consideration.

Best Regards,  
Gina Betts

11344 Alamazon St, San Diego, CA 92129

SI17-1 The EIR for the proposed project addressed cumulative projects that were known at the time that the project Notice of Preparation was issued. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. Relative to evacuation, refer to Response to Comment 1 from Derbique (Letter SI4) regarding the addition of two new potential evacuation routes.

SI17-2 Section 5.2.2 of the Draft EIR demonstrates that intersections and roadway segments would generally operate at acceptable level of service (LOS) with implementation of the proposed project (mitigated condition) and the cumulative projects that were identified for analysis at the time of the project Notice of Preparation in April 2018 (see EIR Tables 5.2-7 through 5.2-10). The worst-case traffic movement at the Peñasquitos Drive/Cuca Street intersection is at a LOS E in the AM peak hour under existing conditions. The traffic signal at this intersection that is proposed as mitigation by the project would result in LOS A during both peak hour periods, and in both Opening Day (2020) Plus Project (Near-term) and Horizon Year [2050] Plus Project conditions.

The Peñasquitos Drive/Janal Way/Future Project Access roundabout, that is also proposed as project mitigation, would operate at acceptable LOS A during both peak hours and in both the Near-term and Horizon Year conditions. As also shown on EIR Tables 5.2-7 and 5.2-9, the intersection of Peñasquitos Drive/Carmel Mountain Road would remain at LOS C, and would therefore operate at acceptable LOS.



## COMMENTS

## RESPONSES

- SI17-2 (cont.) Regarding the Millennium PQ project, the EIR addresses cumulative projects that were known at the time that the project Notice of Preparation was issued on April 10, 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.
- SI17-3 Please refer to the Response to Comment 1 from Derbique (Letter SI4) regarding improvements in community evacuation times with the project, and the Response to Comment 5 from DeLano (Letter SI1) regarding cumulative projects evaluated.

## COMMENTS

## RESPONSES

**From:** Andrew Bortolutti <sddru\_1@hotmail.com>  
**Sent:** Thursday, February 20, 2020 1:19 PM  
**To:** DSD EAS  
**Subject:** Junipers Project, Project #586670

Sara Osborn,

SI18-1

I am a home owner in Rancho Penasquitos at 14410 Janal Way. As a long time resident, myself and my family are extremely concerned about this new development and how it will adversely effect our day-to-day lives. Namely, traffic i.e proposed roundabout and traffic light... The safety concerns are of extreme concern as well. Please realize the Black Mountain Preserve has not burned in decades. If it were to catch fire an evacuation would ensue. The proposed fire escape route is ridiculous. The poor people who bought homes in that portion of the neighborhood must be fuming. They bought a house in a quiet neighborhood, not a thoroughfare! I feel confident to speak for all my neighbors when I say, " we do not want this development in our neighborhood!".....

SI18-2

Please let me know if there are any other means our neighborhood can communicate our displeasure. This is a disgusting display of big business taking over a small neighborhood for monetary gain. Please help us keep our neighborhood exactly that, our neighborhood.

Sincerely,

Andrew Bortolutti

619-246-3739

SI18-1 Comments noted. Potentially significant environmental impacts, including daily effects, are addressed in the environmental analyses required by CEQA. Please refer to EIR Section 5.2 for a complete discussion of the proposed roundabout and traffic signal, as well as the Response to Comment 20 from Haight (Letter SI3A).

Please refer to Response to Comment 25 from Haight (Letter SI3A) for information regarding fire hazard severity as well as the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding emergency evacuation and access improvements and implementation of the evacuation plan. As noted, project implementation would result in a reduction in the estimated Glens community evacuation time following notification from up to 8.3 hours to as few as 3.5 hours, which would improve evacuation conditions for the entire Glens community, including residents on Janal Way. The remainder of the comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.

SI18-2 Comment noted; as it does not address the accuracy or adequacy of the EIR, no response is required. As a point of information, however, additional opportunity for comment will be provided during public hearings on the project when the project is considered for approval or denial.

## COMMENTS

## RESPONSES

**From:** [Christina Catalano](#)  
**To:** [DSD EAS; Rodenbo, Kyle](#)  
**Cc:** [Councilmember Mark Kersey](#)  
**Subject:** [EXTERNAL] Subject: Project 586670 – Junipers  
**Date:** Friday, April 03, 2020 11:16:31 AM

To Sara Osborn -

This letter is in reference to The Junipers Environmental Impact Report (#586670). It's a relief that this report is finally public so the community can see for itself what the impacts will be, instead of imagining the worst-case scenario.

There are a couple topics that are most important to me:

SI19-1

School impacts – The decision to propose an age-qualified community was born out of our community's concerns over impacts to Rolling Hills Elementary School. Both my children attended RHES and it is truly a little gem, I am still actively involved in the school and the community. There were concerns that Lennar would make the homes available to all ages and I'm happy to see that this EIR shows no new students. Will the developer still be required to pay fees to the local school district?

SI19-2

Need for Housing – I'm a local realtor and have seen first-hand the need for homes for seniors. Providing this kind of neighborhood gives quality options to downsize, which will open up traditional, all-age homes for families. If the developer were to change its mind and decide to do an all-age community, is it fair to assume it would have to begin this process over again because the impacts outlined in this report would no longer be accurate?

SI19-3

And lastly, and probably most germane to this review, is the significant attention paid to fire protection planning and emergency evacuation. If The Junipers is approved, will the developer be required to follow through with these improvements, specifically the off-site improvements at Andorra Way? Will the development of the Karlan Hotel change any of the recommendations or the impact report?

SI19-4

I support The Junipers because of the benefits it provides our community. If the golf course has to be developed, I'm glad that consideration was given to the quality of life of those of us who already live here.

Thank you in advance for your thorough review of my questions.

Christina Catalano

15357 Calle Juanito

SD, CA 92129

--  
 Have a wonderful day,

**Christina Catalano**  
**Realtor**

SI19-1 Please refer to the Response to Comment 13 from Commons (Letter SI6) for information regarding the definitions and enforcement of the 55+ age-qualified housing for the project, and the impact on schools.

SI19-2 Comments noted. If a different type of development were proposed for the site in the future, staff would review the development proposal and determine whether the impacts of the revised project would be consistent with those reported in the EIR. If it is determined that the impacts could be greater than those described in the project EIR, the City would require additional environmental analysis. Additionally, although not addressing type of residents, the project proposes a Community Plan Implementation Overlay Zone (CPIOZ) to ensure additional review in case the PDP is approved and then expires without the project being built. If a different design in terms of additional or fewer homes, changes in park area, open space use, etc. were to be proposed that varies from (the amended) Rancho Peñasquitos Community Plan, that also would trigger new review. Potential revisions to the affordable housing component also could require new review by the Housing Commission if the age restriction component was removed. Please refer to the Response to Comment 16 from Haight (Letter SI3A) for additional information regarding age-qualified housing.

## COMMENTS

## RESPONSES

CAL BRE # 01379883  
619-200-3133  
<https://www.facebook.com/Christina-Catalano-Realtor-200324376677511/?pnref=like>

- SI19-3 If the project is approved by the decision makers, the fire protection planning and emergency evacuation improvements described as part of project design would be conditions of the project approval, including the off-site improvements at Andorra Way. They would be mandatory elements of the project construction. Regarding the potential redevelopment of the former Hotel Karlan site, please note that the project EIR addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.
- SI19-4 Comments noted. The comments do not address adequacy or accuracy of analyses in the Draft EIR and do not require response.

## COMMENTS

## RESPONSES

**From:** [Bob & Lorraine Hansen](#)  
**To:** [DSO FAS](#)  
**Cc:** [B. Hansen](#)  
**Subject:** [EXTERNAL] The Junipers Project No. 586670 / SCH No. 2018041032. - PUBLIC COMMENT  
**Date:** Monday, April 06, 2020 9:20:22 PM

Atten: Sara Osborn

DSDEAS@sandiego.gov  
 1222 First Avenue, MS 501  
 San Diego CA 92101.

Re: The Junipers Project No. 586670 / SCH No. 2018041032

I'm writing in regards to my concerns with the Junipers Project.

My name is Bob Hansen. My wife, Lorraine, and I have lived in the neighborhood of the proposed Junipers project for 30 years.

We lived at 11103 Madrigal Street for 21 years and our current address, 14515 Janal Way, for 9 years. In that time we have been evacuated twice due to wild fires and experienced a large backup along Penasquitos Drive when there was a fire at the DoubleTree Hotel.

I have questions about the proposed egress routes in the case of an emergency. I include a page from the project analysis:

#### 5.14.4.2 Impact Analysis

SI20-1 **In the proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, the evacuation travel timeframe for the Glen's community and the future project residents is estimated at 3.5 hours, once notification has been provided. If the northerly emergency evacuation routes to Del Diablo Street and Andorra Way are not used, this would increase the evacuation time to 5.2 hours. This is in comparison to the estimated current evacuation time for The Glens community (without the additional evacuation routes provided by The Junipers) of 8.3 hours (Dudek 2019a). Therefore, the project would reduce evacuation travel time within the project area and would not impair implementation of, or physically interfere with, the current San Diego County EOP or MHMP. Additionally, the project is subject to review by the SDFD and the SDPD to ensure compliance with applicable safety standards.**

I have worked in San Diego for 30 years as TV News reporter (12 years for KFMB Channel 8 and 18 for KNSD NBC 7) and have seen the devastation caused by wildfire. I have covered numerous wildfires and know first hand the importance of quick and efficient evacuation. I have nearly been surrounded by fast moving flames and know how quickly fire can move and cause physical harm and death. I have seen the impact of fires close to our neighborhood in

SI20-1 The excerpt from the EIR is correct and the City notes the rest of the comments. These comments do not address the adequacy or accuracy of the analyses in the Draft EIR and do not require a response.



## COMMENTS

## RESPONSES

SI20-1  
cont. Rancho Bernardo and Scripps Ranch.

SI20-2 1) There is basically one exit from the neighborhood down a two-lane road. *If evacuated in the case of wildfire, do you believe the response time given in the study is adequate to avoid injury and loss of life?*

SI20-3 2) In the early 1990's there was a huge back-up along Penasquitos Drive caused by a fire at the DoubleTree fitness building. Emergency crews blocked one lane of traffic leaving only one exit lane with some cars routed up Janal Way. It was very slow moving. *How would an evacuation be different when nearly doubling the number of homes and residents in the neighborhood?*

SI20-4 3) The Andorra Way exit is blocked at all times. *How would the emergency exit be opened? Who would have to do it? How much time would it take? Who makes the decision?*

SI20-5 4) The Andorra Way exit is narrow and empties into a cul de sac. It seems a very slow alternative that is near potential brush fire fuel. *How efficient could it be in the case of an emergency or wildfire?*

SI20-5 5) Along with the Junipers project, the DoubleTree property is in the process of being turned into a large apartment complex that would be situated at the prime exit from the neighborhood. It appears that the project would add to the bottleneck effect feared by existing residences in the area. *Is the apartment addition being included in the safety analysis of the project?*

SI20-6 6) I have yet to hear a fire expert give a full endorsement to the evacuation plans in the neighborhood other than say that the proposed project would include fire resistant plants and building material. One expert suggested that people in the Junipers development would simply shelter in place in the case of a wildfire. As a news reporter with first hand experience covering fires, I find that extremely hard to imagine. People panic in the face of danger and fear drives people to escape. I think the project would put thousands of lives in danger. *Why does the committee believe that the current evacuation plan is safe and effective?*

Thank you for your time and consideration.

Bob Hansen  
14515 Janal Way  
San Diego, CA 92129

Cell: (619) 250-3795

SI20-2 Pursuant to CEQA Guidelines Section 15125(a), an EIR measures the impacts of a proposed project against a "baseline" of environmental conditions at and in the vicinity of the project site. As noted in Comment 1 of your letter, the project would substantially improve evacuation time over the existing condition. As such, EIR Section 5.14.3 concluded potential wildfire hazards associated with "the project would be less than significant, based on required compliance with applicable State and City standards associated with fire hazards and prevention, as well as through implementation of FPP [Fire Protection Plan] recommendations." Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding emergency evacuation and access improvements.

SI20-3 The description of the single lane for evacuation refers to a specific experience during a specific evacuation event. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for information regarding emergency evacuation and access improvements associated with the proposed project. Also, the condition described was at least in part because there was only one exit from the neighborhood and no alternate routes. While Peñasquitos Drive would continue to be the primary route, provision of a new route southerly through the project from the vicinity of Janal Way would provide direct access through the project site to Carmel Mountain Road via proposed Private Driveways A and V. As alluded to in Comment 1 of your letter, and as stated in EIR Section 5.14.4.2:

*This additional egress would be available to residents of the Glens community as well as the project during an emergency and would include a mountable median with bollards, enabling law enforcement-controlled egress to the east or west along Carmel Mountain Road.*

## COMMENTS

## RESPONSES

CAL BRE # 01379883  
619-200-3133  
<https://www.facebook.com/Christina-Catalano-Realtor-200324376677511/?pnref=like>

SI20-3 (cont.)

*This additional emergency egress route would provide an important alternative should Peñasquitos Drive become congested or impassible during an emergency. This egress route would effectively reduce the time needed to evacuate the Glens community by 30 to 35 percent (Dudek 2019a).*

SI20-4 As stated in EIR Section 3.3.1.6:

*Off-site emergency access/egress between Andorra Way and Corte Raposo would be improved by the project to remove inoperable bollards, install an automatic gate to SDFRD requirements, resurface the connection to carry the imposed load of fire apparatus (75,000 pounds), and provide ongoing vegetation maintenance and gate maintenance funding, providing a usable emergency link between the two streets. The project would also provide for landscape and gate maintenance. The planned improvements for Andorra Way are shown on Figure 3-13, Andorra Way Emergency Access Road. ... gates would be opened by emergency responders only. All primary and secondary entry points described above would be constructed to accommodate emergency vehicle access.*

The time-frame would be instantaneous from the moment that the emergency responders remotely release the gate. The inclusion of gates and bollards for some evacuation routes at the project is not a new or precedent-setting condition. Gated and bollarded routes currently exist throughout the City and are important for limiting the potential that evacuating residents inadvertently drive into an encroaching wildfire. SDFRD has mandated that they control the gates for the evacuation routes, consistent with the current condition. This includes the route between Andorra Way and Corte Raposo. The comment is correct that the current route is narrow and edged by brush. As noted, the route would be resurfaced and vegetation maintenance would occur.

## COMMENTS

## RESPONSES

	<p>SI20-4 (cont.) The proposed improvements have been reviewed and approved by SDFRD staff (see EIR Section 11.0, <i>Individuals Consulted/Preparers</i>) and meet standards for evacuation routes.</p> <p>SI20-5 The project EIR addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. Regardless, as described above in response to your Comment 3, the project would provide a benefit with respect to evacuation timeframe. This benefit from the project would occur, regardless of whether The Millennium PQ project is implemented.</p> <p>SI20-6 The proposed project will not qualify for designation as a shelter in place community, and is not proposed as such. The Wildland Fire Evacuation Plan is a tool for the Glens community. The project development meets current standards for architecture and safety and would be expected to provide additional evacuation routes, in the event of an evacuation of the entire Glens community. During an emergency event, evacuation would be managed and directed by emergency response officials, consistent with the City and County plans and the conditions on the ground.</p>
--	--

## COMMENTS

## RESPONSES

---

**From:** [pat.harris](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Draft EIR comment, Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Friday, April 03, 2020 8:10:28 AM  
**Attachments:** [Draft EIR Response 1.pdf](#)

---

---

Hello,

Attached is a .pdf document containing comments for the Draft EIR detailed in the subject line.

Regards,

Pat Harris  
14397 Janal Way  
San Diego, CA 92129

## COMMENTS

## RESPONSES

SI21A-1	<p>I am commenting on the Draft EIR for the Junipers Project No. 586670. There are multiple elements of the Draft EIR that do not consider the cumulative impacts of the planned Millennium PQ Project #644431 adjacent to the proposed Junipers project. This conflicts with section 6.0 CUMULATIVE IMPACTS of the Draft EIR which states "Section 15130 of the CEQA Guidelines requires that an EIR address cumulative impacts of a project when its incremental effect would be cumulatively considerable. As defined in Section 15335, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Cumulatively considerable means that the incremental effects of an individual project would be considerable when viewed in connection with the effects of past, current, or probable future, projects."</p> <p>The Millennium PQ Project #644431 is a proposed 331 multi-family apartment unit development occupying the property of the recently closed Hotel Karlan, a 174-room hotel which is bordered on 2 sides by the Junipers Project property. The purchase of the Hotel Karlan property and the plan to turn it into a residential development was public knowledge and known by the San Diego Planning Department staff and the Junipers Project developers at least 6 months before the Junipers draft EIR submission (building permit invoice figure 1). Why were the CEQA guidelines ignored in this submission?</p>	SI21A-1 The EIR addresses cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.
SI21A-2	<p>Despite the fact that The Millennium PQ Project, a significant multi-unit expansion was planned with a single intersection ingress/egress at Cuca St and Penasquitos Dr., the Draft EIR does not take into account the impact of the expected or estimated additional traffic and flow at this intersection. The Draft EIR has already designated this intersection as "Significantly Impacted" with only the Juniper project. From Draft EIR Section 5.2-17:" Based on City of San Diego significance criteria, project-related increases in delay at Intersection #6 (Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway) and Intersection #7 (Peñasquitos Drive/Janal Way/Future Project Access) would result in significant impacts because both intersections would be degraded from LOS E and C, respectively, to LOS F and E, respectively."</p> <p>The EIR Appendix B, Transportation Impact Analysis and Trigger Analysis Memo states on page 7 "For purposes of this analysis, the trip generation for all 536 housing units was calculated using the City of San Diego Trip Generation Manual, May 2003, trip generation rate for "Retirement/Senior Citizen Housing". This same source (figure 2 screen shot) also indicates that the multi-unit Millennium PQ Project will generate twice as many average daily trips per unit(8) and more than twice the Peak Hour traffic of the Junipers project. This means that the Millennium PQ project will generate more daily traffic on Penasquitos Drive than the Junipers project. (Junipers: 536 units X 4trips/unit= 2,144 average daily trips. Millennium PQ- 331units X 8 trips/unit= 2,648 average daily trips.</p> <p>Penasquitos Drive is a 2 lane road, and the only way in and out to over 1500 existing housing units in the Glens neighborhood. All of this uncalculated additional traffic will occur at a single intersection already significantly impacted by just the Junipers additional traffic.</p>	SI21A-2 Regarding Millennium PQ, please refer to the Response to Comment 5 from DeLano (Letter SI1). Please refer to Response to Comment 20 from Haight (Letter SI3A) regarding intersection operations at Cuca Street/Peñasquitos Drive and Janal Way/Peñasquitos Drive, as well as area roadway segments.
SI21A-3	<ul style="list-style-type: none"> <li>What is the real impact of the anticipated traffic at this intersection(#6) and how can the proposed mitigation actions be justified if the traffic study calculations are incorrect?</li> </ul>	SI21A-3 Please refer to Response to Comment 20 from Haight (Letter SI3A) regarding intersection operations at Cuca Street/Peñasquitos Drive and Janal Way/Peñasquitos Drive, as well as area roadway segments, as well as EIR Section 5.2.2.2, <i>Impact Analysis (Transportation)</i> . The transportation impact assessment calculations are correct and consistent with City analysis procedures.

## COMMENTS

## RESPONSES

- SI21A-4
- With intersection #6 traffic impact significantly understated, what level of service and mitigations are incorrect for intersection #7? For the other intersections to the south impacted by the cumulative traffic?
- SI21A-5
- The bottlenecking of traffic through 2 heavily impacted intersections on a Penasquitos Drive, single 2 lane road, will cause a heavy diversion of traffic onto neighborhood streets of Janal Way (first available bypass) and Cuca St causing unsafe conditions for the residents. What can be done to discourage drivers from cutting through neighborhood streets?
- SI21A-6
- The northern connection of the Glens at Andorra Way to Corte Raposo in Rancho Bernardo can be upgraded and improved in order to allow Glens traffic an additional route in/out of the community via Camino Del Norte and Interstate 15. This would reduce the traffic load on Penasquitos Drive and increase safety. Why has this option not been proposed as mitigation?

Figure 1.

Invoice #904719	
Invoice Information	
Status	Paid
Issued on	08/19/2019
Issued by	Austin, Jessica
Customer	Longmore, Dave
Firm	Permit Solutions
Paid	08/19/2019 \$290,695.07
Invoice Details	
Project #544431 - Millennium PQ (bldgs)	Project Subtotal \$290,695.07

SI21A-4 As shown in Response to Comment 20 from Haight (Letter SI3A), the cumulative impact at the Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway (Intersection 6) is not understated. Regarding Millennium PQ, please refer to the Response to Comment 5 from DeLano (Letter SI1). The transportation impact assessment calculations are correct and consistent with City analysis procedures.

SI21A-5 As described in Transportation Impact Analysis Section 7.2 and largely cited in the EIR Section 5.2.2 under the heading "Trip Distribution":

*Residents of age-qualified housing include both retirees who would tend to avoid unnecessary peak hour trips and travel to a variety of local and regional destinations, and those still in the workforce whose travel patterns reflect that of a more typical commuter.*

*Using the above-mentioned assumptions, approximately 20% of the daily Project trips were regionally distributed on I-15 to the north with 25% to the south, with 11% oriented to/from the west on SR 56. The remaining 44% were distributed to the local network. A small amount of Project-related traffic may make use of Cuca Street and Janal Way to access destinations further to the west via Carmel Mountain Road. The incentive to use either roadway as cut-through route for destinations is low, given the good traffic operations along the main roadways (LOS C on Peñasquitos Drive, LOS A on Carmel Mountain Road between Cuca Street and Peñasquitos Drive, LOS C during AM/PM peak hours at Carmel Mountain Road/Peñasquitos Drive intersection). However, of the two, Cuca Street is more direct, with fewer fronting land uses, and as such, 3% of Project traffic was distributed via this roadway. Janal Way is a steep, circuitous, and unappealing as a cut-through route.*



## COMMENTS

## RESPONSES

Figure 2.

TABLE 1 (Continued)  
TRIP GENERATION RATE SUMMARY  
(WEEKDAY)

May 2003

LAND USE	DRIVEWAY <sup>(1) (2)</sup>	CUMULATIVE <sup>(3)</sup>	PEAK HOUR AND IN/OUT RATIO	
	VEHICLE TRIP RATE	VEHICLE TRIP RATE	AM (IN/OUT)	PM (IN/OUT)
<b>RESIDENTIAL <sup>(3)</sup></b>				
Congregate Care Facility	2 trips/dwelling unit	2 trips/dwelling unit	3% (6:4)	8% (5:3)
Entire Housing	12 trips/dwelling unit	12 trips/dwelling unit	12%	12%
Mobile Home	5 trips/dwelling unit; 40 trips/acre	5 trips/dwelling unit; 40 trips/acre	9% (3:7)	12% (6:4)
Multiple Dwelling Unit:				
Under 20 dwelling units/acre	8 trips/dwelling unit	8 trips/dwelling unit	8% (2:8)	10% (7:3)
Over 20 dwelling units/acre	6 trips/dwelling unit	6 trips/dwelling unit	8% (2:8)	9% (7:3)
Retirement/Senior Citizens Housing	4 trips/dwelling unit	4 trips/dwelling unit	12%	12%
Single Family Detached:				
Urbanized Area <sup>(1)</sup>	9 trips/dwelling unit	9 trips/dwelling unit	8% (2:8)	10% (7:3)
Urbanizing Area <sup>(1)</sup>	10 trips/dwelling unit	10 trips/dwelling unit	8% (2:8)	10% (7:3)
<b>TRANSPORTATION FACILITIES <sup>(3)</sup></b>				
Bus Depot	25 trips/1,000 sq. ft.	25 trips/1,000 sq. ft.		
Park & Ride Lot	400 trips/acre; 600 trips/paved acre	400 trips/acre; 600 trips/paved acre	14% (7:3)	15% (3:7)
Transit Station (rail)	300 trips/acre	300 trips/acre	14% (7:3)	15% (3:7)

Notes:

(1) From the 1990 Trip Generation Manual. Driveway rates reflect trips that are generated by a site. These rates are used to calculate the total number of trips that impact the project and its immediate vicinity.

(2) Does not include trip rates for Centre City area. See Table 5.

(3) San Diego Association of Governments (SANDAG), "Traffic Generators," San Diego, California, December 1996, and July 1998.

SI21A-7 Please consider performing a more complete and accurate traffic study to determine proper development sizing, traffic circulation and mitigation measures to maintain our safe community.

Thanks,

Pat Harris  
14397 Janal Way  
San Diego, CA 92129

SI21A-5 (cont.)

*This is borne out by the existing peak hour turning movement volumes, which show a total of 7 AM and 5 PM peak hour trips between Janal Way and the entirety of the development served by Peñasquitos Drive to the north.*

SI21A-6 CEQA requires analysis of a project's potential impacts on existing conditions. If a project is modeled to result in significant impacts, mitigation is required. In this instance, the project's significant impacts were shown at two intersections (at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and Peñasquitos Drive/Janal Way/Future Project Access) as described in Response to Comments 2 and 5, in the southeast portion of the Glens community. The proposed mitigations, a roundabout at Peñasquitos Drive/Janal Way and a signal at Peñasquitos Drive/Cuca Street, address these locations directly, and would mitigate the project's traffic impacts. As a result, there is no nexus to require alternative mitigation in a location more removed from the project impact.

SI21A-7 The EIR and Transportation Impact Analysis (Appendix B to the EIR) have correctly analyzed the project development sizing, traffic circulation and mitigation measures. Although reducing the size of a project can result in reductions in many types of impacts, and a reduced intensity project alternative is analyzed in Section 8.4.3 of the EIR, the proposed project would not result in any significant, unmitigated impacts that would be avoided by reducing the project size.

## COMMENTS

## RESPONSES

---

**From:** [pat.harris](#)  
**To:** [DSD EAS](#)  
**Subject:** [EXTERNAL] Draft EIR comment 2- Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Friday, April 03, 2020 2:49:40 PM  
**Attachments:** [Draft EIR response 2.pdf](#)

---

---

Hello,

Attached is a 2nd .pdf document from me containing comments to the Draft EIR detailed in the subject line.

Regards,

Pat Harris  
14397 Janal Way  
San Diego, CA 92129

## COMMENTS

## RESPONSES

SI21B-1

The following are comments on the Draft EIR for the Junipers Project No. 586670. Multiple critical issues exist with respect to the traffic study and proposed mitigations. An updated and complete traffic study should be completed in order to accurately understand the traffic flow, impacts of the proposed developments and mitigation measures. Is this possible? In particular, intersections 6 (Penasquitos Drive/ Cuca St./ Hotel Karlan) and 7 of (Penasquitos Drive/ Janal Way/ Project access) have direct and cumulative impacts not addressed in the Draft EIR summary. Issues include:

SI21B-2

- From Draft EIR Summary page 5-4: "The project would construct a public park, **which the public can access via Janal Way**. This public park would provide approximately 2.87 net usable acres of parkland. The land set aside for public park would be dedicated to and maintained by the City. The public park includes a dog run area, children's play areas, picnic and game areas, bike racks, and a large turf area."
  - A public park with access from Janal Way(intersection 7) will generate pedestrian and bicycle traffic which will cross Penasquitos Drive at the Janal Way intersection. This pedestrian and bicycle traffic and impact on traffic flow, delays and level of service of this intersection have not been addressed in the draft EIR. What impact does community pedestrian and bicycle traffic to and from the public park at this intersection have on level of service and traffic flow?
  - The proposed traffic circle at intersection 7 does not provide a protected crossing point to/from the park for pedestrians at the highest risk, including children, the elderly and people crossing the street with pets. A park and development featuring playground equipment, a dog park, bicycle and walking trails will be a magnet for the local community. What safety measures are proposed to protect pedestrians at this intersection?
  - Pedestrians crossing intersection 7 will stop southbound traffic along Penasquitos Drive at Janal Way. This will queueing of southbound traffic before the traffic circle, impacting the LOS and delays of all further southbound intersections on Penasquitos Drive. These delays will significantly impact the Levels of Service during peak hours. What other mitigation measures can be incorporated to reduce these impacts to a reasonable level?

SI21B-3

- The traffic signal at intersection 6 was proposed as mitigation for that intersection without inclusion of The Millennium PQ Project #644431331. This intersection is the lone egress/ingress for the Millennium PQ project and the LOS and delays of this project have direct, cumulative and dire impacts at this intersection and corresponding street segments. The Millenium PQ development is expected to generate more traffic on Penasquitos Drive and this intersection than the Junipers development. Shouldn't this traffic be included in the LOS calculations and mitigation measures?

SI21B-4

- The proposed developments will generate pedestrian and bicycle traffic at intersection 6, which will have a signal protected pedestrian crossing. This will be the most direct pedestrian traffic crossing point to the local transit areas outlined in the Draft EIR. This pedestrian and bicycle crossing will extend the time that traffic is stopped southbound on Penasquitos Drive at the traffic signal. These additional delays will result in queued traffic extending to the traffic circle intersection 7 at Janal way and halt traffic flow in the circle. This will cause a significant impact at both intersections during peak hours, even with the proposed mitigations. Over 1500 existing housing units utilize this 2-lane road as the only egress/ingress for the community. Can the traffic study calculations be re-done with correct data to ensure appropriate mitigation measures?
- Additionally, the pedestrian traffic generated by the development described above will halt northbound vehicle traffic at intersection 6. This traffic will queue in the single lane northbound and impact the lone artery into the community at Penasquitos Drive/Carmel Mountain Road. This will lead to unacceptable delays during peak hours. What is the projected number of pedestrians crossing Penasquitos Drive at this intersection during peak hours? Have the extended pedestrian crossing cycles at this signalized intersection been calculated into the impact analysis?

SI21B-1

The study has correctly analyzed the project and associated cumulative development relative to traffic flow, potential impacts and appropriate mitigation measures. Please refer to EIR Section 5.2, *Traffic/Circulation*, and the Response to Comment 1 of your letter of April 3 letter of 8:10 AM. The comment is incorrect that the impacts associated with the Peñasquitos Drive intersections with Cuca Street/Hotel Karlan and Janal Way/Project Access (intersections 6 and 7, respectively) are not addressed in the EIR Summary. Mitigation measures for those intersections are identified on EIR Table S-1 as TRA-1 and TRA-2, which is part of the Summary. Please also see the Response to Comment 2 of this letter, immediately below.

SI21B-2

Pedestrian and bicycle traffic is factored into the analysis of roundabout function evaluated in the EIR. Section 5.2.3, *Impact 2, Potential for Traffic Hazards*, specifically addresses whether the project would increase hazards to pedestrians or bicyclists, in addition to vehicles. The project has designed all street upgrades in accordance with City standards, including width, striping, landscaping control to ensure line of sight, etc. The roundabout at the Janal Way/Future Project Access at Peñasquitos Drive would slow currently free-flow traffic along Peñasquitos Drive at an existing intersection, and provide marked cross-walks across Peñasquitos Drive where none is currently located. Nonetheless, traffic flow is projected to attain Level of Service (LOS) A. Pedestrian/bicycle use through the roundabout would be expected to be intermittent and would not notably affect the projected LOS. Under existing conditions, neighborhood residents making a left turn from Janal Way onto Peñasquitos Drive must wait for all cross traffic to be absent to safely cross. The roundabout would calm speeds along Peñasquitos Drive as well as identify appropriate crossing locales, in an area with

## COMMENTS

## RESPONSES

	<p>SI21B-2 (cont.) appropriate line-of-sight (see Figure 3-12e, <i>Peñasquitos Drive-Janal Way Roundabout Improvements</i>). As stated in EIR Section 5.2.3.3:</p> <p><i>The project would include improvements to facilitate the safe movement of motor vehicles, bicyclists, and pedestrians within the site and with connections to the surrounding area.</i></p> <p><i>The proposed circulation improvements would not increase traffic hazards to motor vehicles, bicyclists, or pedestrians, and would enhance emergency access and evacuations for the project site and the Glens community. As a result, impacts related to the increase of traffic hazards as a result of the project would be less than significant.</i></p> <p>SI21B-3 The project Transportation Impact Analysis addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.</p> <p>SI21B-4 Please refer to the Response to Comment 1 of your letter of April 3, 8:10 AM regarding Millennium PQ.</p> <p>As shown in EIR Tables 5.2-12 and 5.2-13, under both Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions, with the signal proposed by the project for mitigation at the Peñasquitos Drive/Cuca Street, operations would be at LOS A.</p> <p>Table 17-2 of the Transportation Impact Analysis shows the calculated northbound and southbound queues at both the Cuca Street and Janal Way intersections with Peñasquitos Drive.</p>
--	---

## COMMENTS

## RESPONSES

SI21B-4 (cont.) As shown in that document, the southbound queues at Janal Way would be 150 feet/25 feet in the AM/PM peak hours, respectively. Both would operate at LOS A. For the northbound direction, queues at Janal Way would be 25 feet/100 feet in the AM/PM peak hours, respectively, also at LOS A. At Cuca Street, the southbound queues would be expected to be 226 feet/107 feet in the AM/PM peak hours, and 191 feet/425 feet for the northbound queues in the AM/PM peak hours, respectively. The distance between the two intersections is approximately 590 feet, or 0.1 mile. Again, all approaches during both AM and PM peak hours would operate at LOS A.

## COMMENTS

## RESPONSES

SI21B-5

- The traffic generated from the Junipers development has been vastly understated by the traffic study, which results in inaccurate impacts and insufficient mitigation measures. The applicant uses the term “Retirement/Senior Citizen Housing” to describe the development and to use those designations to justify the traffic study calculations (more details on traffic study in response below).  
  
“Retirement/Senior Citizen Housing” and traffic from those communities in the late 1990s and early 2000s are quite a bit different than they are today. 20-30 years ago, retirement and senior citizen housing developments were primarily single-story 1-2 bedroom units less than 1500sq feet. Even the 55+ community today will most frequently use the statement “I don’t want stairs” when describing their requirement for housing.  
  
The housing needs and 55+ buyer profile has evolved in the last 20 years. Most 55 to 65 year olds remain in the workforce and even aged 70+ folks are still actively employed. As the cost of housing in San Diego has skyrocketed, multi-generational homes are more common than ever in the last 50 years. The developers of this property are aware of this and that is why they are building many large housing units to meet this demand. This is a good thing, but the traffic generated from the proposed development should not be likened to a retirement community profile from 20 years ago. The development has already increased in number of units since its first introduction to the community and Rancho Penasquitos Planning Board. Currently the proposed housing units are:  
  
  - **133 single detached homes** would be constructed on the property. All of these units would be **one to two stories high, with floor plans ranging from 1,738 to 2,527 SF, including three or four bedrooms and two to three bathrooms**. A four-bedroom 2,500 SF two story home is not where Grandma and Grampa are going to live out their quiet golden years. These units will be occupied by at least one person age 55 or older, but will also likely include multiple people in traditional workforce employment and secondary education with associated travel patterns. What are realistic ADT and Peak Hour traffic estimates for this type of housing unit?
  - **136 two-story duplex units** would range from **1,946 to 2,106 SF, with 3 bedrooms and 2 or 2.5 bathrooms each** on 40’ x 50’ modules. Again, two-story 2000+ 3 bedroom homes are not what most traditional retirement/senior citizens are seeking as they begin to experience mobility issues.
  - Some of the **186 six-plex units** would be **two-story and over 2200 SF with 4 bedrooms and 3 bathrooms**. Some would be single story and as little as 2 bedroom 1,200 SF. The size distribution is not determined, but some of these units more closely match the estimated traffic generation.
  - The “up to 81” one- and two-bedroom for rent apartments in the affordable housing section are the only units that should use the “retirement home” traffic generation models.

SI21B-6

The draft EIR Appendix B, Transportation Impact Analysis and Trigger Analysis Memo states on page 7, “the trip generation for all 536 housing units was calculated using the City of San Diego Trip Generation Manual, May 2003, trip generation rate for “Retirement/Senior Citizen Housing”. Peak hour rates are not provided by the City’s manual. The SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002, was used to calculate the peak hour trip generation. Using both sources, the proposed Project is forecasted to generate a total of 2,144 ADT with 107 trips during the AM peak hour (43 inbound / 64 outbound) and 150 trips during the PM peak hour (90 inbound / 60 outbound)”.

- The Traffic Study relies on data collected and traffic conditions from over 20 years ago and published in the 2003 City of San Diego Trip Generation Manual. Excerpt of manual copied below with footnote highlighted

SI21B-5 City standard trip rates per land use are provided on the Trip Generation Rate Summary, as included in Comment 6 of your letter. As such, the projected traffic volumes associated with the project have not been understated.

SI21B-6 The comment correctly summarizes the current project residential uses as provided in Section 3.0 of the EIR. Please refer to EIR Section 4.0 for information on the higher density options evaluated prior to evaluation of the proposed project. This EIR uses applicable City thresholds and standards (including peak hour assessment), based on the City of San Diego Significance Determination Thresholds, dated July 2016 and other City documentation. These thresholds and standards are used consistently in technical analyses. As noted in the comment, the Institute of Transportation Engineers (ITE) is an international association. ITE data are based on national inputs and are not solely specific to San Diego, which the City standards are. ITE standards may be



## COMMENTS

## RESPONSES

TABLE 1 (Continued)  
TRIP GENERATION RATE SUMMARY  
(WEEKDAY)

May 2003

LAND USE	DRIVEWAY (1) (2)	CUMULATIVE (6)	PEAK HOUR AND IN-OUT RATIO	
	VEHICLE TRIP RATE	VEHICLE TRIP RATE	AM (IN-OUT)	PM (IN-OUT)
<b>RESIDENTIAL (3)</b>				
Congregate Care Facility	2 trips/dwelling unit	2 trips/dwelling unit	3% (6:4)	8% (5:5)
Estate Housing	12 trips/dwelling unit	12 trips/dwelling unit	12%	12%
Mobile Home	5 trips/dwelling unit, 40 trips/acre	5 trips/dwelling unit, 40 trips/acre	9% (3:7)	12% (8:4)
Multiple Dwelling Unit:				
Under 20 dwelling units/acre	8 trips/dwelling unit	8 trips/dwelling unit	8% (2:8)	10% (7:3)
Over 20 dwelling units/acre	6 trips/dwelling unit	6 trips/dwelling unit	8% (2:8)	9% (7:3)
Retirement/Senior Citizens Housing	8 trips/dwelling unit	8 trips/dwelling unit	12%	12%
Single Family Detached:				
Urbanized Area (1)	9 trips/dwelling unit	9 trips/dwelling unit	8% (2:8)	10% (7:3)
Urbanizing Area (1)	10 trips/dwelling unit	10 trips/dwelling unit	8% (2:8)	10% (7:3)
<b>TRANSPORTATION FACILITIES (3)</b>				
Bus Depot	25 trips/1,000 sq. ft.	25 trips/1,000 sq. ft.		
Park & Ride Lots	400 trips/acre; 600 trips/paved acre	400 trips/acre; 600 trips/paved acre	14% (7:3)	13% (3:7)
Transit Station (rail)	300 trips/acre	300 trips/acre	14% (7:3)	13% (3:7)

## Notes:

- (1) From the 1990 Trip Generation Manual. Driveway rates reflect trips that are generated by a site. These rates are used to calculate the total number of trips that impact the project and its immediate vicinity.
- (2) Does not include trip rates for Centre City area. See Table 5.
- (3) San Diego Association of Governments (SANDAG). "Traffic Generators." San Diego, California, December 1996, and July 1998.
- (4) City of San Diego memo. "Trip Generation Rate for Churches." December 9, 1992.
- (5) Refer to Cumulative Vehicle Trip Rate column for reduced trip rates.
- (6)  $\ln$  = Natural logarithm; fitted curve logarithmic equation is used for Commercial Office and Regional Shopping Center. For example, the trip generation of an Office Building with 100,000 sq. ft. of GLA is:  $\ln(T) = 0.756 \ln(100) + 3.95$ , or  $\ln(T) = 0.756 (4.60517) + 3.95$ , or  $\ln(T) = 3.481509 + 3.95$ , or  $\ln(T) = 7.431509$ , which is 1,688 trips. The trip generation of a Regional Shopping Center with 1,000,000 sq. ft. of GLA is:  $\ln(T) = 0.756 \ln(1,000) + 5.25$ , or  $\ln(T) = 0.756 (6.907755) + 5.25$ , or  $\ln(T) = 5.222263 + 5.25$ , or  $\ln(T) = 10.47226$ , which is 35,322 trips. See Table 2 for calculated trip generation for selected sizes of Regional Shopping Centers, and Table 3 for calculated trip generation for selected sizes of Commercial Offices. GLA = Gross Leasable Area; T = trips; x = GLA in 1,000 square feet.

- More timely and accurate data exists with which to make realistic ADT trip and peak hour calculations for the proposed development. The Institute of Transportation Engineers (ITE) is an international membership association of transportation professionals that publish industry-standard and recognized technical documents and research relating to transportation. The ITE Trip Generation Manual, 10th Edition (2017) indicates through multiple data studies that the Draft EIR estimates of trip generation and peak hour traffic are understated. This results in greater than calculated direct and indirect impact and potential insufficient mitigation of traffic flow and circulation in the community.
  - am peak hour traffic from Senior Adult Housing is much higher than the estimated 5% stated in the Draft EIR. Data from the ITE Trip Generation Manual, 10th Edition indicates that am peak hour traffic is 9% of ADT. Chart of data below with Peak Hour traffic percentages highlighted.

SI21B-6 (cont.) used when an agency does not have its own standards, but are typically not used when a lead agency has specified standards. As suggested in the comment, technical experts may disagree. Please also see EIR Section 5.2.2.2 and Section 7.2 of the Traffic Impact Analysis in EIR Appendix B for a discussion of methodology.

SI21B-6  
cont.

## COMMENTS

## RESPONSES

**Hourly Distribution of Entering and Exiting Vehicle Trips by Land Use**

Source: ITE *Trip Generation Manual*, 10th Edition

Land Use Code	251	
Land Use	Senior Adult Housing -	
Setting	Detached	
Time Period	General Urban/Suburban	
Trip Type	Weekday	
# Data Sites	Vehicle	
	6	
	% of 24-Hour Traffic	
Time	Entering	Exiting
12-1 AM	0.3	0.1
1-2 AM	0.2	0.1
2-3 AM	0.1	0.1
3-4 AM	0.1	0.1
4-5 AM	0.1	0.3
5-6 AM	0.2	1.1
6-7 AM	0.8	3.7
7-8 AM	2.3	8.7
8-9 AM	3.8	9.3
9-10 AM	5.2	8.5
10-11 AM	6.0	7.8
11-12 PM	7.0	7.7
12-1 PM	7.4	7.8
1-2 PM	7.0	7.2
2-3 PM	7.6	6.8
3-4 PM	9.1	6.6
4-5 PM	9.6	6.2
5-6 PM	10.1	6.3
6-7 PM	7.5	5.5
7-8 PM	5.3	2.6
8-9 PM	4.5	1.4
9-10 PM	3.3	1.1
10-11 PM	1.8	0.8
11-12 AM	0.9	0.3

SI21B-7

- Data below presented at the ITE 66<sup>th</sup> Annual Meeting regarding Senior Housing Trip Generation ( <https://www.ite.org/pub/?id=e2318e3d%2D2354%2Dd714%2D5119%2D2cd67225c3e0>) indicates that the ADT rate average from multiple sources is calculated to be 4.52, or 5.64 if a >3000 unit Caltrans studied development is eliminated from the calculation. The Draft EIR states that ADT is 4/DU, which is understated based on the data below.

SI21B-7 Please refer to the Response to Comment 6 of this letter. As a point of information, the ITE Trip Generation Manual 10th edition identifies trip generation for age-qualified housing varies from 3.7 to 4.27 trips per day, which is similar to the 4 trips per day used in the analysis.

## COMMENTS

## RESPONSES

Daily Trip Generation Rates for Senior Housing

Source	Number of Dwelling Units	Daily Trips	Trip Rates
Caltrans	3122	9630	3.09
	300	830	2.78
	108	310	2.87
	76	260	3.42
	460	2252	4.90
Florida DOT	366	3262	8.91
	560	1985	3.55
	187	1449	7.75
	120	901	7.51
	127	561	4.42
Arizona DOT	125	972	7.78
	176	855	4.86
	74	447	6.04
	60	285	4.75
	216	1386	6.42
	175	1058	6.05
	129	941	7.30
	112	922	8.23
	106	820	7.74
	89	538	6.05
	81	529	6.53
	60	494	8.23
Penn. CCF	247	1163	4.71
Weighted Average	7135	32282	4.52
Without 3,122 units	4013	22652	5.64
ITE Average Weekday Daily Rates			
Single-Family (Code 210)			9.55
Apartment (Code 220)			6.47
Condo/townhouse (Code 230)			5.86
Congregate Care Facility (Code 251)			2.15

Senior Housing Trip Generation and Parking Characteristics  
Institute of Transportation Engineers 66th Annual Meeting

- Table 7-1 below is from the draft EIR Appendix B page 24. Two rows have been added with additional traffic calculations using ITE data described above. This shows projected AM and PM peak hour traffic from the project 2 to 3 times greater than estimated. This will significantly impact multiple intersections in the community and add evidence that the current proposed mitigations are insufficient.

TABLE 7-1  
PROJECT TRIP GENERATION

Land Use	Size	Daily Trip Ends (ADTs) <sup>a</sup>		AM Peak Hour					PM Peak Hour				
		Rate <sup>b</sup>	Volume	% of ADT <sup>b</sup>	In-Out Split <sup>b</sup>	Volume			% of ADT <sup>b</sup>	In-Out Split <sup>b</sup>	Volume		
						In	Out	Total			In	Out	Total
PROPOSED PROJECT													
Age-Qualified (55+) Residential	536 DU	4/DU	2,144	5%	40:60	43	64	107	7%	60:40	90	63	150

Project generation using ITE ADT Rate and Volume data

Age-Qualified (55+) Residential	536 DU	4.52 /DU	2,423	9%	40:60	87	131	218	9.8%	60:40	142	95	237
Age-Qualified (55+) Residential	536 DU	5.64 /DU	3023	9%	40:60	109	163	272	9.8%	60:40	178	118	296

Footnotes:

a. ADT = Average Daily Traffic.

b. Rates taken from City of San Diego Trip Generation Manual, May 2003 and SANDAG (No. 50) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002.

General Notes:

1. DU = dwelling units

SI21B-8 Comments noted. Please refer to the above Responses to Comments 5, 6 and 7 for the reasons that the City finds the Transportation Impact Analysis to be reasonable and accurate. Re-calculation is not required. As shown in EIR Section 5.2 traffic tables, roadway segments would operate at acceptable LOS in both Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions, with the proposed project improvements/mitigation. Project impacts at intersections at Peñasquitos Drive with Janal Way and Cuca Street, respectively, would be mitigated by the project, improving conditions with the project to LOS A at each intersection.

## COMMENTS

## RESPONSES

SI21B-8  
cont.

The calculations in the table above demonstrate that even small variations in the average daily trip rate and peak hour traffic have significant overall impacts on traffic flow and circulation at intersections and street segments. Can these impacts be re-calculated to include updated/realistic ADT and peak hour volume data? What direct and indirect impacts will result and what mitigation measures will be sufficient to maintain acceptable traffic flow and circulation in the community? Will these calculations cause additional triggering in the traffic flow and circulation study area?

SI21B-9

Given the single-lane queueing in both directions on Penasquitos Drive, it seems that widening this street segment from 2 to 4 lanes would allow additional mitigation measures that may be sufficient to maintain acceptable traffic flow and circulation. If Penasquitos Drive becomes 4 lanes from Carmel Mountain Rd to just north of the Janal Way intersection, there would be adequate space for a multi-lane roundabout at the Janal Way intersection. There would also be twice the queueing space available between Janal Way and Cuca, reducing the chances of this street segment backing-up and impacting additional intersections. The developer owns the land needed for this widening, so this could be accomplished without impacting current Penasquitos Drive residents' property lines. The developer of Millennium PQ project(#644431331) would also need to enter into discussions about providing some of their property for this street segment widening. This seems reasonable given the cumulative traffic impacts their proposed development has on these same street segments and project approval based on mitigation measures. Can this alternative be studied?

I am not opposed to a reasonable development on the property. My primary concerns center around the infrastructure needs and safety of the community. Properly mitigated traffic on the sole artery in and out of the Glens neighborhood is a must with any additional development impacting traffic on Penasquitos Drive.

Regards,

Pat Harris  
14397 Janal Way  
San Diego, CA 92129

SI21B-9 As shown on EIR Tables 5.2-6, 5.2-8 and 5.2-10, evaluated road segments would operate within capacity. The lack of significant impacts means that there is no nexus to require additional mitigation or alternatives. Please also refer to Response to Comment 4 of this letter regarding projected LOS A traffic flow at the intersections as supported by projected queue lengths on Peñasquitos Drive.

As a point of clarification, EIR Figure 3-1 illustrates that the amount of project frontage onto Peñasquitos Drive is associated with the primary project entry and small amounts of park on either side.

Relative to infrastructure needs and safety, the project was determined to have significant effects at both the Janal Way and Cuca Street intersections with Peñasquitos Drive. Mitigation is proposed by the project in the form of intersection upgrades (a roundabout at Janal Way and a signal at Cuca Street), as detailed in Responses to Comments 2 and 5 in your letter of April 3, 8:10 AM.

## COMMENTS

## RESPONSES

---

**From:** [pat harris](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Additional draft EIR comments- Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Sunday, April 05, 2020 9:11:23 AM  
**Attachments:** [Draft EIR response 3.pdf](#)

---

---

Hello,

Attached please find a .pdf document with additional draft EIR comments for the project detailed in the subject line.

Can you please verify you have received this submission? I have sent multiple comments via email without acknowledgement of receipt.

Thanks,  
Pat Harris  
14397 Janal Way  
San Diego, CA 92129

## COMMENTS

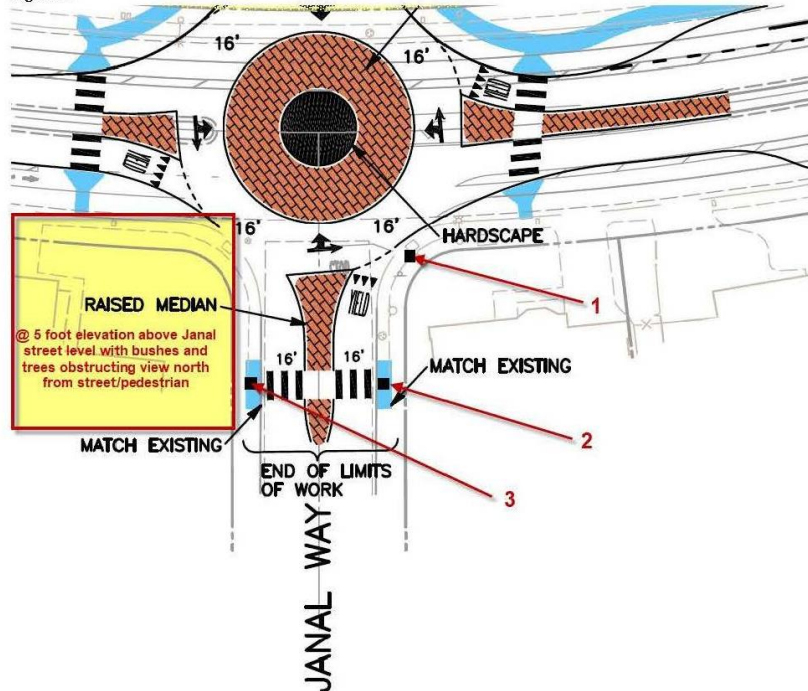
## RESPONSES

SI21C-1

The following are comments on the Draft EIR for the Junipers Project No. 586670.

I have several safety concerns with the proposed traffic circle at Janal Way and Penasquitos Drive. Below is part of an image (Figure 1) copied from the draft EIR Appendix B page 62, Figure 15-2A. A few additional notes have been added to clarify the comments and images described in this document. The area outlined in red and highlighted in yellow is part of the property of a home on the north-west corner of Janal Way and Penasquitos Drive. This property is sloped and has a significant elevation difference above the level of the adjacent street, Janal Way. The soil level of this property is approximately 5 feet over the street level of Janal Way and there is also brush and trees on the property. The geographical difference and vegetation obstruct the view from Janal Way to the southern approach of vehicular traffic on Penasquitos Drive. This poses a safety hazard for pedestrian, vehicle and bicycled traffic on Janal Way.

Figure 1



SI21C-1 Comments noted. The comment sets the stage for specific comments provided below and describes existing conditions. The comment is correct that private property is located on the north side of Penasquitos Drive at Janal Way, with an existing slope and landscaping.



## COMMENTS

## RESPONSES

Picture 1 was taken from the existing crosswalk at the southwest corner of Janal Way and Penasquitos Drive indicated by red "1" on figure 1. The view is to the north, across the Janal Way crosswalk with a clear view of the southbound lane of Penasquitos Drive which has a posted speed limit of 35mph.

Picture 1



SI21C-2 Picture 1 of existing conditions is noted.

Picture 2 was taken from the approximate location of the proposed crosswalk indicated by the red "2" on Figure 1. The view is to the north and the visibility of southbound traffic on Penasquitos Drive is clearly obstructed by the hillside geography and vegetation. This poses a safety hazard to pedestrians crossing north across the Janal Way crosswalk, as they are unable to determine traffic flow and estimate a safe crossing time to avoid getting hit by a southbound vehicle turning right from Penasquitos Drive.

SI21C-3 Picture 2 of existing vegetation and topography is noted.

## COMMENTS

## RESPONSES

Picture 2



SI21C-3  
cont.

SI21C-4

A pedestrian standing at the crosswalk indicated by the red "3" in Figure 1 would have zero visibility to southbound traffic on Penasquitos Drive. Picture 3 was taken from this spot looking north toward Penasquitos Drive. A pedestrian attempting to cross southbound on the Janal Way crosswalk would be in grave danger of being hit by a right turning vehicle from Penasquitos Drive as they cannot see vehicular traffic until it has entered the traffic circle.

SI21C-4 As shown on the roundabout plan view in the comment letter and Figure 3-12e of the EIR, the realignment of the intersection with the roundabout would pull traffic movement southerly and extend new sidewalk into area currently shown on the above-cited photographs as vehicular travel way, increasing sight distance and intersection safety.

## COMMENTS

## RESPONSES

Picture 3

SI21C-4  
cont.

SI21C-5

Was pedestrian visibility and safety evaluated at this intersection? There is a proposed park with playground equipment, a dog park, walking trail and bicycle trail access directly across Penasquitos Drive from this intersection. This will result in additional pedestrian and bicycle traffic in the area. Does this intersection meet the safety standards expected by this development and the city of San Diego?

SI21C-6

The US Department of Transportation has published a document titled- Roundabouts: an Informational Guide (<https://www.fhwa.dot.gov/publications/research/safety/00067/000676.pdf>). Section 6.3.10 Intersection Sight Distance on page 161 states, "Intersection sight distance is the distance required for a driver without the right of way to perceive and react to the presence of conflicting vehicles. Intersection sight distance is achieved through the establishment of adequate sight lines that allow a driver to see and safely react to potentially conflicting vehicles". The is an illustration of sight distance on page 162 copied below showing an example of sight distance and a sight triangle.

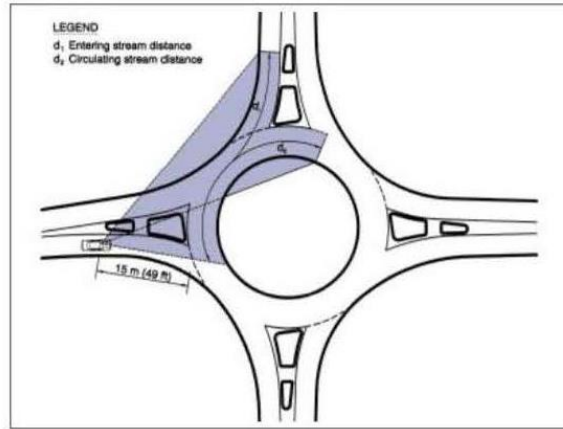
SI21C-5 The roundabout design meets sight distance standards. Please refer to Response to Comment 6, immediately below, for additional information.

SI21C-6 As stated and depicted in the comment, the US Department of Transportation (USDOT) has published roundabout standards that specifically include sight distance standards. The proposed project roundabout design meets those sight distance standards. Information and guidance is also provided in the City March 2017 Street Design Manual. Please refer to Figures 3-12Ce and f of the EIR which provide plan and cross section views of the intersection. Figure 3-12e depicts in plain view both existing lane configuration and the proposed configuration. As shown, the crossing locations have been moved north and south, respectively, from Janal Way.

## COMMENTS

## RESPONSES

Exhibit 6-32. Intersection sight distance



6.3.10.1 Length of approach leg of sight triangle

SI21C-6  
cont.

What sight distance and sight triangle calculations were used to evaluate this intersection? Are there height guidelines for obstructions? A car traveling east on Janal Way approaching the proposed traffic circle would not have appropriate unobstructed visibility to perceive and react to vehicles traveling southbound on Penasquitos Drive. The visibility would be worse than that of Picture 2, as the driver would be approximately 10 feet toward the middle of the road and closer to the obstructions will less of a viewing angle to Penasquitos Drive. Does the city of San Diego consider this a safe and adequate intersection for the community?

SI21C-7

The traffic circle, being an access to the park, will invite new levels of pedestrian traffic crossing Penasquitos Drive at Janal Way. Some of these pedestrians will be at a higher risk of misjudging the traffic patterns of the traffic circle. The elderly, children, bicycles and people crossing with pets are at increased risk of crossing Penasquitos Drive at an uncontrolled crosswalk. The added vehicle traffic at this intersection from the development coupled with the introduction of an unfamiliar traffic circle and increased pedestrian traffic will increase the likelihood of an incident at this intersection. An accident involving vehicles or vehicles vs pedestrians will result in the halting of traffic at the circle. The single lane egress for over 2000 housing units will now have a significantly higher likelihood of being blocked. Local traffic accidents will not trigger the emergency egress points proposed in the development. Does the city of San Diego Planning Department use any kind of threshold to determine the number of housing units that can be reduced to a single ingress/egress lane? How many thousands of people is it

SI21C-6 (cont.) Individuals moving across Peñasquitos Drive would have clear views in both directions as they would be starting their crossing actions from locations that are currently in paved travel lanes. Views would not be obstructed by topography or vegetation. It is also noted that the crossings would be shorter, as the connections to sidewalk would be closer than under current conditions.

SI21C-7 The sight distance conditions noted above and placement of crosswalks would meet standards for pedestrians, as well as vehicular and bicycle traffic. The new proposed curb is being moved 8 feet closer to the median to "neck down" the driving lane and reduce the travel speed in the roundabout compared to straight line driving. All criteria published in the USDOT roundabout documents are being achieved.



## COMMENTS

## RESPONSES

SI21C-7  
cont.

acceptable to limit to 1 lane (and trap if that lane is blocked) before triggering alternate route mitigation for safety and security? Can the emergency egress options of the project be studied to allow for full time ingress/egress use to reduce the chance of the entire community being cut-off by 1 incident?

I am also concerned that considerable traffic will use Janal Way to avoid the traffic back-up and delays at the traffic signals at Cuca St and Carmel Mtn Road. Vehicles in the existing Glens community and the Junipers development who want to travel eastbound on Carmel Mountain will use Janal Way and Cuca St. to bypass the bottlenecks at the signals on Penasquitos Drive. The proposed mitigations will increase the danger in neighborhoods by incentivizing traffic to use local streets to bypass the increase delays on Penasquitos Drive.

The Draft EIR states on page 25 of Appendix D: "A small amount of Project-related traffic may make use of Cuca Street and Janal Way to access destinations further to the west via Carmel Mountain Road. The incentive to use either roadway as cut-through route for destinations is low, given the good traffic operations along the main roadways (LOS C on Peñasquitos Drive, LOS A on Carmel Mountain Road between Cuca Street and Peñasquitos Drive, LOS C during AM/PM peak hours at Carmel Mountain Road / Peñasquitos Drive intersection). However, of the two, Cuca Street is more direct, with fewer fronting land uses, and as such, 3% of Project traffic was distributed via this roadway. Janal Way is a steep, circuitous, and unappealing as a cut-through route."

SI21C-8

I dispute the conclusions of these statements. First- AM peak hour traffic at the Janal Way/Penasquitos Drive/Project access proposed traffic circle is vastly understated as outlined in other Draft EIR comment submissions. The am Peak hour traffic for the entire Junipers development must exit the property at the lone traffic circle intersection at Janal Way. Second- AM peak hour traffic at the Penasquitos Drive/Cuca/Hotel Karlan intersection was calculated as significantly impacted *without* the inclusion of the AM peak hour traffic of the Millennium PQ development proposed with sole egress at that intersection. That development will produce more traffic at this intersection than the Junipers project (less total units but higher average daily trips). Third- AM peak hour traffic from the >1500 existing housing units from the Glens neighborhood have been able to travel, without stopping, through the single southbound lane through these street segments until they reach the light or queue at the Penasquitos Drive, Carmel Mountain intersection. This traffic will now need to slow, yield and possibly stop at the traffic circle and possibly stop at the signal at Cuca. Taken together, these conditions will result in extended queueing of traffic at the Penasquitos Drive/Cuca St signal and the Penasquitos Drive/Carmel Mountain signal. This queueing will be easily visible from the traffic circle at Penasquitos Drive/Janal Way. AM peak hour traffic from the existing community and the Junipers project will then be highly incentivized to take Janal Way to bypass the visible delays. As stated in the EIR above, "Janal Way is steep and circuitous," which adds to the safety risk for the residents when increased thru traffic is forced into their neighborhoods. Can complete and accurate traffic calculations be performed so that mitigation measures are put in place that promote and maintain safety in our community? There seems to be a lot of evidence here that the safety of the existing community is not a priority with this project.

Thanks,  
Pat Harris  
14397 Janal Way  
San Diego, CA 92129

SI21C-8 As noted, the EIR and the Transportation Impact Analysis in EIR Appendix B specifically state that "a small amount of project-related traffic may make use of Cuca Street and Janal Way to access destinations further to the west..." Also as cited, the text goes on to state that "the incentive to use either roadway as cut-through routes...is low, given the good traffic operations along the main roadways" (Peñasquitos Drive and Carmel Mountain Road). Nonetheless, three percent of traffic was distributed along Janal Way, to ensure that modeling was appropriately capturing potential future conditions.

Please see Response to Comment 6 of your letter of April 3, 2:49 PM regarding the assertion that peak hour traffic has been understated. The comment is correct that AM peak-hour traffic would exit from Janal Way onto Peñasquitos Drive. This was assumed in project modeling. Regarding Millennium PQ, the project Transportation Impact Analysis addressed cumulative projects that were known at the time that the project Notice of Preparation was issued. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. Please also refer to the Response to Comment 2 of your letter of April 3, 8:10 AM (SI21A). As shown in that response, projected impacts at the Cuca intersection would be mitigated to LOS A with project implementation. Also as described in Response to Comment 4 of your 2:49 PM letter (SI21B), the queue lengths associated with both intersections would range from maxima of 25 to 100 feet in length and would pass through at LOS A. As such, it is not expected to result in diversion of substantial traffic onto side routes. The technical analysis and EIR concluded that with project mitigation (TRA-1 and TRA 2), project area intersections along Peñasquitos Drive would operate at LOS A and post-mitigation impacts would be less than significant.

## COMMENTS

## RESPONSES

<p><b>From:</b> <a href="#">Brian Hollandsworth</a>  <b>To:</b> <a href="#">DSD FAS</a>; <a href="#">Councilmember Mark Kersey</a>  <b>Subject:</b> EIR comment for Junipers Project 586670  <b>Date:</b> Wednesday, February 19, 2020 7:26:50 PM  <b>Attachments:</b> <a href="#">Millennium PQ concept.pdf</a></p> <hr/> <p>SI22-1 The January 2020 EIR was developed under the existing conditions in 2018 before the Hotel Karlan was sold to Dinerstein Companies in December 2018. Dinerstein is now building 331 market rate apartments on an "exclusive resort style amenity campus", which greatly increases the traffic volume and fire evacuation risk.</p> <p>SI22-2 The Millennium PQ project concept is attached. The architect removed the project from their web site after the public became aware of the project being approved without any community notification or input. The hotel land has CV-1-1 zoning, which was appropriate for a 172 room resort that included a golf course. It is baffling that the project for 331 apartments was approved and nothing to cater to the lodging, dining, and recreational needs of the surrounding population.</p> <p>"The purpose of the CV zones is to provide areas for establishments catering to the lodging, dining, and recreational needs of both tourists and the local population. The CV zones are intended for areas located near employment centers and areas with recreational resources or other visitor attractions."  <a href="https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division05.pdf">https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division05.pdf</a></p> <p>SI22-3 The Carmel Mountain Ranch shopping center parking lots and Carmel Mountain Road overpass are already near capacity on a daily basis with many more proposed developments in the pipeline.</p> <p>SI22-4 A reasonable mitigation to the traffic and fire impact the PQ developments put on the community is a freeway overpass that connects the former golf course near the post office. This will not solve the capacity problems for the CMR shopping centers and CMR freeway on and off ramps.</p>	<p>SI22-1 Comments noted. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for cumulative projects information.</p> <p>SI22-2 Comments noted. These comments address processing of the Millennium PQ Project and do not address the adequacy or accuracy of the project Draft EIR. No response is required.</p> <p>SI22-3 This comment does not address the adequacy or accuracy of analyses in the Draft EIR and no response is required.</p> <p>SI22-4 As described in EIR Section 5.14.4 and the Wildland Fire Evacuation Plan (Appendix K4 to the EIR), evacuation times for the Glens community would drop from a projected current time of 8.3 hours following notification without the project to 3.5 hours following notification with the project and identified cumulative projects. The project, therefore, would not have significant fire evacuation impacts (rather the project would improve the existing condition); nor would the project result in significant impacts to the Carmel Mountain Road overpass and I 15 northbound and southbound ramps. Please refer to the Response to Comment 4 from DeLano (Letter SI1) regarding the screening analysis that was done for the I-15 freeway.</p>



## COMMENTS

## RESPONSES

SI22-5



SI22-5 The graphics attached are of the Millennium PQ Project. These comments address processing of the Millennium PQ Project and do not address the adequacy or accuracy of the project Draft EIR. No response is required.

SI22-5  
cont.

1/7/2020

Millennium PQ | San Diego, CA - Newman Gantson + Partners

NG

P

work


news

office

contact

f

in



Millennium PQ

San Diego, CA

Typology

Mixed-Use Apartments • Commercial

This residential project is located in the community of Rancho Penasquitos, San Diego, CA. This development consists of eight separate buildings with a total of 331 residential apartments in Type

<https://nggpartners.com/portfolio-item/millennium-pq-san-diego-ca/>

1/2

COMMENTS

RESPONSES

SI22-5  
cont.

1/7/2020

Status

Pre-Development

Site

14.35 Acres

Density

23.4 d.u./ac

Units

331

Client

The Dinestein Companies

Millennium PQ | San Diego, CA - Newman Garrison + Partners

31-A & V-A wood frame structures consisting of one, two and three-bedroom units, ranging from 483- 1450 SF with tuck under and surface parking in a campus style setting.

For the residents, there is an amenities campus for recreation or leisure activities, a private pool with cabana area along with a "State of the Art" Clubhouse and Fitness Center. In addition the development shall feature a separate 2,500 sf community serving commercial building.

The leasing center greets future residents and guests as they arrive at the exclusive resort style amenity campus, which sits at the heart of the development. Rancho Penasquitos is considered one of the most desirable communities in San Diego County. As such, this lifestyle, resort oriented village reflects site planning and product type that is contemporary with current market conditions. Millennium PQ is envisioned to have a transitional suburban aesthetic and "feel". At the same time, however, care will be given to create a unique place that is respectful toward the environmental needs. Open space and landscape areas, pedestrian and recreational amenities are approached in a thoughtful manner that creates a modern, welcoming neighborhood.

^

Copyright © 2019 | All rights reserved

<https://nngpartners.com/portfolio-item/millennium-pq-san-diego-ca/>

2/2

RTC-183

## COMMENTS

## RESPONSES

---

**From:** [Phillip Hoos](#)  
**To:** [DSD\\_EAS](#)  
**Subject:** Public Comments on The Junipers Development DEIR (Project No. 586670 / SCH No. 2018041032)  
**Date:** Monday, April 06, 2020 5:06:16 PM  
**Attachments:** Comments on Junipers DEIR.docx

---

---

To whom it may concern,  
Attached are my public comments concerning the Juniper Development DEIR. My comments are also provided in the body of this email in case you have trouble opening the attached document.

Kind regards,  
-Phil

## COMMENTS

## RESPONSES

## Comments on the Draft Environmental Impact Report

April 6, 2020

To whom it may concern,

Below are my comments regarding the Draft Environmental Impact Report (DEIR) released for the proposed Junipers development project (Project No. 586670 / SCH No. 2018041032), in Ranch Penasquitos. In my comments, the Junipers project is referred to as the proposed development or proposed project.

Kind regards,

-Phil Hoos

Resident of Rancho Penasquitos

## DEIR Comments

- SI23-1
1. What is the basis for assumption that the proposed Juniper project (was not expected to add 50 or more peak hour trips to I-15? Draft Environmental Impact Report (DEIR) at 5.2-1. The proposed development includes 536 total units (DEIR at 5-1). How is it a reasonable assumption that less than 10% of the units to this development would commute on I-15 during peak traffic times?
  2. Why rely on the "trip generation rate" based on the "retirement/senior citizen housing" section of the City of San Diego's Trip Generation Manual? DEIR at 5.2-9. The proposed development is for people 55 years and older. Shouldn't the project applicant or the City assume most of the individuals living in the proposed development would still work, or have family members living with them (spouses or children) that commute to work? Isn't that a more reasonable assumption? Has the City or applicant evaluated traffic patterns at an existing 55-year-or-older housing residence to test the validity of using the "retirement/senior citizen housing" estimates?
  3. How would the traffic impacts outlined in Chapter 5 differ if the City or applicant assumed a majority of residents in the proposed development commuted to work? Why not study both assumptions?
- SI23-2
4. The cumulative projects examined in Chapter 5 to study traffic impacts seem inadequate. Why did this study not include the proposed development of the Hotel Karlan itself (Millennium PQ Project)? DEIR at 5.2-10 (listing 3 projects that were analyzed in the cumulative analysis; which list did not include the Millennium PQ Project). Since the Millennium PQ Project would be located near the Juniper Project, shouldn't the City add the Millennium PQ Project to the list of cumulative projects analyzed when evaluating traffic impacts to this neighborhood?
- SI23-3
5. Are the results of the DEIR's traffic analysis valid for purposes of CEQA if it fails to include all nearby proposed projects in the cumulative impact analysis?
  6. Did the DEIR evaluate how the worsening traffic identified in Table 5.2-7 would impact traffic along nearby roads? Won't degraded driving conditions along Penasquitos Drive identified by Table 5.2-7 cause other delays along other roadways?

SI23-1 Please refer to the Response to Comment 2 from DeLano (Letter SI1) for an explanation of the trip generation rate used for the project Transportation Impact Analysis. Please also refer to the Response to Comment 5 from Chiu (Letter SI2) regarding the trip distribution methodology used for the project Transportation Impact Analysis.

Assuming that the project is not an age-restricted development could result in additional commuter trips to I-15. That would be speculative, however, as the project would be age-restricted in nature. Speculative analysis is not required under CEQA. As noted in CEQA Guidelines Section 15064(d)3: "A change which is speculative or unlikely to occur is not reasonably foreseeable."

SI23-2 The project EIR addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.

## COMMENTS

## RESPONSES

SI23-3 As demonstrated in EIR Tables 5.2-7 and 5.2-9, as well as post-mitigation Tables 5.2-12 and 5.2-13, numerous intersections in the community, with the greatest potential to be affected by project traffic, were evaluated and the analysis demonstrated that these intersections would continue to operate at acceptable Level of Service (LOS), and in the cases of the intersections of Peñasquitos Drive with Janal Way and Cuca Street, at better LOS post mitigation, compared to the existing condition. Similarly, EIR Tables 5.2-8 and 5.2-10 show that nearby roadway segments would continue to operate at current LOS, with implementation of the project.



## COMMENTS

## RESPONSES

## Comments on the Draft Environmental Impact Report

- SI23-4 7. On page 5.2-21, the DEIR identifies Intersections #1, 10, and 11 as being currently at LOS E, and notes that the proposed project would add to delays along these three intersections. Should these impacts be significant even though they do not worsen conditions to LOS F?
- SI23-5 8. On page 5.6-8, the DEIR claims the proposed project is consistent with City Policy CE-A.2 regarding construction using energy efficient structural design elements. But Policy CE-A.2 also references reducing the City's carbon footprint by reducing vehicular trips. How does the proposed development address reducing vehicular trips? To be consistent with Policy CE-A.2, shouldn't the proposed development be placed closer to job centers of San Diego?
- SI23-6 9. On page 5.6-10, Policy ME-A.7 discusses improvements to existing streets and walkability. However, it appears that the DEIR only addresses improved walkability WITHIN the development. For the proposed development to be consistent with Policy ME-A.7, doesn't the proposed development have to improve walkability on the sidewalks and streets surrounding the development site, not just inside the development site?
- SI23-7 10. On page 5.6-12 of the DEIR, it states that the proposed development is currently inconsistent with the General Plan and Community Plan (Plan) for the proposed site of the project, which designates the site for open space. Why is it appropriate to describe a project as being consistent with the Plan, when a consistency determination requires future actions that are not certain? How many other conclusions/assertions in the DEIR regarding project impacts are based on actions that the developer must take some time in the future?
- SI23-8 11. On page 5.6-16, the DEIR states that the proposed development is designed to include a rooftop PV system that would generate 1396 DC kW. Is the developer required to install this exact PV system? Could the developer decide not to install the PV system after the project is approved? If so, how valid is the assumption in the DEIR regarding the proposed development's greenhouse gas impacts? See DEIR at 5.6-16, 5.7-17.
- SI23-9 12. On page 5.6-17, the DEIR bases its greenhouse gas emissions from mobile sources on the fact that the proposed development is age-restricted? What are the assumptions made about how residents of an age-restricted development would travel as compared to a development that is not age-restricted?
- SI23-10 13. On page 5.6-19, the DEIR says the "operational GHG emissions" from buildout of the project is consistent with existing zoning. But the proposed development is not yet consistent with the General Plan and Community Plan (5.6-12), so aren't the "operational GHG emissions" inconsistent with the General Plan and Community Plan?

SI23-4 Table 5.2-3, *Traffic Impact Significance Thresholds*, in the EIR depicts the thresholds would result in a significant traffic impact if they are exceeded, based on City standards. As explained in Footnote "a" of this table, if a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. If the project does not cause an intersection to reach LOS E or F, but would add traffic to the intersection that would result in additional intersection delays of 2.0 seconds (for LOS E) or 1.0 seconds (for LOS F), then a significant impact would result. As shown in Tables 5.2-5, 5.2-7 and 5.2-9, the only intersections that would reach LOS E or F and for which the project would exceed the delay thresholds, compared to the condition without the project, would be the Peñasquitos Drive/Cuca Street and Peñasquitos Drive/Janal Way/Future Project Access intersections. Significant impacts were identified and intersection improvements were required as mitigation. The delays added by the project at Intersections 1, 10 and 11 would not exceed the significance thresholds. Therefore, EIR Section 5.2.2.4 concludes direct and cumulative impacts to the intersections of Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and Peñasquitos Drive/Janal Way/Future Project Access would be reduced to less than significant with the incorporation of a traffic signal and a roundabout per mitigation measures TRA-1 and TRA-2.

SI23-5 The project would reduce vehicular trips through project design. First, it is proposed to be an age-restricted development, which as referenced in Response to Comment 1 of this letter, is expected to generate fewer trips per day per household than other types of residential projects. The project is infill in nature, located near commercial uses and business centers in Rancho Peñasquitos, Rancho Bernardo, and City of Poway. The project would provide: "Increased transit accessibility due to improved

## COMMENTS

## RESPONSES

SI23-5 (cont.) pedestrian and bicycle access through the project site (near Metropolitan Transit System [MTS] Line 20) and provision of new senior housing adjacent to a SANDAG Transit Oriented District (SANDAG 2015)" as cited in EIR Section 3.3.1.3, *Sustainable Design Features*. This section describes the proximity of bus stops and pedestrian accessibility, as well as improvements to encourage bicycle use. Figures 3-9b and 3-9c, depict the site location relative to the Carmel Mountain Plaza major shopping/commercial amenity (just across I-15), off-site proposed and existing bike lanes, bus stops, park & ride locales, and the Sabre Springs Transit Center and Rancho Bernardo Transit Station. This is supported through a publicly accessible mobility zone and bicycle hub in the southeastern corner of the project site, to promote bicycling, transit, ridesharing and other options (see EIR Figure 3-8). These elements support reduction in vehicular trips. The project is consistent with General Plan Conservation Element Policy CE-A.2.

The on-site bike lanes connection noted above in this response are shown on Figure 3-9b. Existing Class II (striped) bike lanes are located along Peñasquitos Drive (marked up to and fronting Rolling Hills Elementary School to the intersection with Alamazon Street north of the school) and along Carmel Mountain Road. Similarly, they are located along Carmel Mountain Road as it trends easterly, across I-15 to meet the Class II facilities along Rancho Carmel Drive and provide bike lane access to both sides of Carmel Mountain Plaza.

EIR Table 5.6-9 details City Climate Action Plan (CAP) measures, including those of Strategy 3 (Bicycling, Walking, Transit & Land Use). As shown in Table 5.6-9, the project would be consistent with all applicable CAP Consistency Checklist Step 2 measures and would be consistent with the City's CAP with respect to planning and land use strategies.

## COMMENTS

## RESPONSES

SI23-6 Projects are required to meet design requirements of the City (e.g., refer to Response to Comment 5 above), as well as to mitigate significant impacts resulting from their implementation. For clarification, the project's on-site social loop trail and sidewalks are designed to connect to existing off-site sidewalks and crosswalks (see EIR Figure 3-9a), and to be available and accessible to off-site residents as well. This includes connections to existing sidewalks along Peñasquitos Drive, Del Diablo Way, Del Diablo Street and Carmel Mountain Road. Access to the north side of Peñasquitos Drive (west-bound street) would be facilitated by the roundabout proposed at Janal Way, as would access by neighborhood users to the future on-site neighborhood park. This would improve crossing conditions for pedestrians as they enter or cross Peñasquitos Drive as it would provide slowing along Peñasquitos Drive at Janal Way, which is currently controlled by stop signage on Janal only. The proposed roundabout would improve entry and crossing potential for non-vehicular users. Crossings at Carmel Mountain Road are already signalized at Peñasquitos Drive, and another signal would be installed by the project at Peñasquitos Drive and Cuca Street, which provide protected crossings for pedestrians due to stopping of vehicular traffic. The project is therefore anticipated to improve pedestrian mobility within the community. In response to how the project can be consistent with Policy ME-A.7, please note that general and community plan policies do not require that development projects correct existing deficiencies or improve transportation elements outside of the development impact area unless there is a direct nexus to project impacts. Because no CEQA-significant impacts have been identified, additional off-site improvements are not required.

## COMMENTS

## RESPONSES

	<p>SI23-7 The “future actions” referenced in the comment would either occur contemporaneously with City decision-maker approval of the project (e.g., amendment of the Rancho Peñasquitos Community Plan) or be a condition of the project (e.g., project design features), and would be implemented during project permitting and construction, with City verification. Details regarding the Rancho Peñasquitos Community Plan are addressed in EIR Section 5.1.2.2. No actions would trail to later dates.</p> <p>SI23-8 Project design features become conditions of a project’s approval. The developer must install a PV system that would generate the specified voltage. Implementation of project conditions is confirmed during the project build process by City building inspectors. If conditions are not met, permits for occupancy will not be issued. Calculated assumptions regarding project greenhouse gas emissions are considered valid.</p> <p>SI23-9 Different uses generate different numbers of trips per day. For instance, senior/retirement housing is expected to generate an average of four trips per day per household, as opposed to non-age-restricted housing, which is expected to generate greater numbers of trips per day. Please also see the Response to Comment 2 from DeLano (Letter SI1) for an explanation of the trip generation rate source.</p> <p>SI23-10 Although the land use designation of the site does not match that of the proposed project, Section 5.6.2.2 of the EIR provides a consistency analysis to determine whether the project would exceed the projected GHG emissions that would occur with implementation of a use that would be consistent with the existing General Plan/Community Plan designation, and determined that with implementation of the extensive sustainability measures proposed by the project (refer to EIR Section 3.3.1.3, <i>Sustainable Design Features</i>), the project would</p>
--	---

## COMMENTS

## RESPONSES

SI23-10 (cont.) would have lower GHG emissions than would occur with redevelopment of the site with a golf course, consistent with the existing General Plan/Community Plan designation. A comparison analysis of the GHG impacts with the maximum development that would be consistent with the underlying RS-1-14 zoning was also provided. As stated:

*...operational GHG emissions were calculated for three scenarios for comparison purposes: the project, the existing RS-1-14 zoning designation based on 831 dwelling units, and the existing Community Plan Land Use as a golf course. The project would result in emissions of 1,827 MT CO<sub>2</sub>e per year, which would be 110 MT CO<sub>2</sub>e less than development as a golf course land use and 9,928 MT CO<sub>2</sub>e less than the maximum potential development under the existing zoning.*

As a result, the proposed project would result in lower emissions rates than either adopted plan designations or zoning, and also would comply with General Plan goals for reductions in emissions and implementation of sustainable design.

## COMMENTS

## RESPONSES

**From:** Gary Jackson <gjackson4344@gmail.com>  
**Sent:** Monday, April 06, 2020 11:21 AM  
**To:** DSD EAS  
**Subject:** [EXTERNAL] Attn Sara Osborn; Questions regarding The Junipers Project 586670, Sch No. 2018041032

4/5/20

To: Ms Sara Osborn, DSDEAS San Diego

From: Gary and Virginia Jackson

14686 Wye St

San Diego, CA 92129

(858) 472 2157

Subject: Questions concerning EIR for The Junipers Project 586670, Sch No. 2018041032

Dear Ms. Sara Osborn and San Diego City:

Thank you for the chance to respond to the proposed development east of Penasquitos Drive known as *The Junipers*. Our comments and questions are included below with page and paragraph from the submitted EIR document.

- SI24-1 1. p. 108, Section 5.2-25. Traffic light and traffic circle at PQ drive
- SI24-2 **Q. How will this help alleviate the expected increase in traffic which is already a problem during certain times of the day? Has the large additional development nearby (between I-15 and Carmel Mtn. Rd.) already under construction been factored into this assessment?**
- SI24-3 **Q. How can this be classified as "less than significant" with the risk of additional people who sometimes misbehave?**
- SI24-4 **Comment.** Traffic is already a problem, even with the closing of the resort and hence no visitors. The roundabout and traffic signal will not mitigate this, only further exacerbate the situation.
- SI24-5 2. P.225, Section 5.14.3 Fire Risk.
3. p. 225, Section 5.14.3 Emergency Response.

1

SI24-1 The Pacific Village project currently under construction has been factored into the transportation assessment, in addition to Merge 56 and the Preserve at Torrey Highlands. These projects were included in impact analyses completed for the project's Opening Day (2020) shown for Near Term conditions, and accommodated in Horizon Year (2050) conditions growth.

The analysis showed that the project would result in a significant impact at two intersections, and mitigation has been required that would result in an improved Level of Service (LOS), compared to the existing condition. As shown on EIR Table 5.2-1, the worst-case movement at the Peñasquitos Drive/Cuca Street intersection currently operates at LOS E during the AM peak hour, and this would become LOS F with project implementation. This would be improved by mitigation to install a signal at that intersection.



## COMMENTS

## RESPONSES

	<p>SI24-1 (cont.) As a result, operations would improve to LOS A, the least congested condition. Similarly, although the worst-case movement at the Peñasquitos Drive and Janal Way intersection currently operates at an acceptable LOS C, this would worsen to LOS E in the AM peak hour with project traffic. As a result, a roundabout has been proposed as required mitigation. With the proposed roundabout, that intersection also would operate at LOS A in both Opening Day (2020) Plus Project conditions and under Horizon Year (2050) Plus Project conditions.</p> <p>The project would not result in significant impacts at any other intersections or roadway segments as shown in the EIR. Please see Tables 5.1-5 through 5.1-10, respectively. Projected operations for the two noted intersections with mitigation are shown on Tables 5.2-12 and 5.2-13, respectively.</p> <p>SI24-2 This comment expresses disagreement with the EIR's conclusions but does not address accuracy or adequacy of the document. For information supporting the disputed conclusion, however, please see Response to Comment 1, above, and EIR Section 5.2.</p> <p>SI24-3 In terms of safety assessment (including wildfire potential) EIRs are not required to assume that individuals may break the law or misbehave, per se. The EIR does address whether the addition of the project population would result in additional need for police or fire services. Because no new facilities would be required, and the project would contribute through developer impact fees to support additional police and fire department resources, impacts were assessed as less than significant. Please refer to EIR Section 5.14, <i>Health and Safety</i>.</p>
--	---

## COMMENTS

## RESPONSES

- SI24-4 Comment noted. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements.
- SI24-5 Comment noted. Please refer to the Response to Comment 1 from Derbique (Letter SI4), regarding additional emergency access/egress and improvements that would occur with project implementation. All of the emergency access/egress improvements proposed by the project are conditions of the project and would be implemented during project construction. These commitments would be implemented with the project, and would not be deferred "to a future date." The improved evacuation time includes departure of the project vehicles as well. The access routes can be used for both ingress and egress, and as they are primarily two-way in nature through the project and on area surface streets, can be used simultaneously by vehicles both accessing and exiting the area, as directed by public officials.

COMMENTS

RESPONSES

SI24-5  
cont.

**Q. How can proposed exit routes be successfully implemented and not just something to be addressed “at a future date”?**

Comment. If there is a major wildfire west of this new development, rapid response of the Fire department is essential. The fuel (sage brush, etc.) on the hill above existing homes is dense and fire danger is significant. The impact of hundreds more cars trying to flee the area will create congestion that will significantly hinder response to wildfires. Additional access (both ingress and egress) are essential and must be implemented in parallel ,and not a future option if this project is to go forward. The proposed light and traffic circle at Janal may help the new residents but will further inhibit egress for present residents north of this intersection. This is the only way out for these people! This is a big weakness in this plan. A careful design of new routes for simultaneous ingress (fire and emergency vehicles) and egress (fleeing residents) is essential and should be started on day 1 if this project is approved.

4. p. 225, Section 5.14.3 Emergency Response.

**Q. How can proposed exit routes be successfully implemented and not just something to be addressed “at a future date”?**

Comment. If there is a major wildfire west of this new development, rapid response of the Fire department is essential. The fuel (sage brush, etc.) on the hill above existing homes is dense and fire danger is significant. There have been wildfires in this area above homes in the past.

SI24-6

**Possible improvement to this project:** Our biggest concern about this project in terms of Environmental Impact is the effect on the environment if there is a large brush fire and emergency response is impaired by the increase in traffic. One mitigation would be to provide additional ingress and egress to both *The Juniper* and the residences that are currently limited to exit only by Penasquitos Drive. The best solution would be another freeway access point between Carmel Mtn Rd (exit 21) and Camino del Norte (exit 22). Other possibilities would simply create more traffic jams, but other solutions may be possible.

Thank you,  
Gary and Virginia

SI24-6 Comment noted. Please refer to Response to Comment 3 of Cicchelli (Letter SI9). The project would also upgrade some off-site neighborhood roadway elements and build new ones across the site, thereby improving emergency vehicle access and emergency egress options (including upgrades to emergency access to/egress from Andorra Way), as described in Section 3.0 and analyzed in Section 5.14 of the EIR. Finally, please note that in emergency situations, emergency personnel direct traffic as needed (which may include making all lanes one way to speed up evacuation) and emergency vehicles may use street shoulders and/or travel against traffic as necessary. Comments noted. The improvements described in Response to Comment 4, above, would be usable by existing Glens residents in the case of emergency. The exit to the northeast would allow evacuating traffic to move via Camino del Norte, and would relieve stress on the existing exit route via Peñasquitos Drive and Carmel Mountain Road. Refer to Response to Comment 2 from Birdsall (Letter SI8A), for detailed information regarding proposed emergency evacuation and access improvements.

## COMMENTS

## RESPONSES

**From:** [Sunita Juneja](#)  
**To:** [DSD FAS](#)  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 10:06:33 PM

Hello Sara Osborn,

I have the following questions/concerns regarding the Junipers Project 586670:

**Page 108 Section 5.2-25 Significance of Traffic Impact and Page 234 Section 6.2.2 Transportation/Circulation**

SI25-1

In regards to traffic, how does adding a traffic light add to the ease of residents in PQ Glen leaving the development during peak work hours (7:15-8:30)? When the low income housing off of Carmel Mountain road (now Pacific Village) was fully occupied, it would take 5-10 minutes for residents to get from PQ drive to 15S and sometimes it was backed up until Cuca street just to turn left on Carmel Mountain road. Now that there is even more residents planned for Pacific Village as well as the proposed Junipers this is going to be a significant traffic impact to the PQ Glen residents. The light will just allow the PQ Glen residents to continue to back up on PQ drive, while the Juniper residents can turn out onto PQ drive. This is going to severely impact the daily commute of the PQ residents and a better proposal is to figure out a way to get another exit to the development or another way out of PQ Glen to avoid PQ drive altogether. This is causing significant worry and stress to me as I love my community and this proposed development is the one reason that will force us to leave our dream home. We need another way to get out of the neighborhood- not just for emergencies. Is there going to be another proposal to address this?

**Page 225 Section 5.14.3 Impact 2: Fire Risk and Page 226 Section 5.14.4 Impact 3: Emergency Response**

SI25-2

In Response to Fire Risk, how will this project not result in an increase in fire risk? Right now it is open space with very little to catch fire. Adding all of this development is going to add to the fire risk? Why is this less than significant? In regards to emergency evacuation, what is the proposed Private Driveway V (Southeastern project site egress to Carmel Mountain Road ) referring to? We live on Ajanta Ct (the far back corner of PQ Glen so we will be the last to get out of the neighborhood during an evacuation so we will not even be able to get anywhere near Carmel Mountain road with all of this new proposed development. Will the Adorra Way proposed route actually happen and can it be used for fire evacuation?

**Page 254, Section 7.1.5 Schools**

SI25-3

What are the restrictions for elementary school aged children living in the community? It is quite possible that children live with their grandparents or where a resident can marry someone younger and have elementary aged children. Is this addressed somewhere? Will it be restricted?

SI25-4

Overall, I cannot understand how this development is a good thing for the PQ community. More people, more traffic, more congestion, more fire risk. This was supposed to be open space not a development for money hungry land owners/developers. Our neighborhood is unique, everybody knows everyone body and this is in jeopardy as deteriorating quality of life will ensue if this development takes place. A compromise can and should be made to reduce the number of units/density of keep it as open space but this current proposal is not the way to go.

Thank you for your consideration,  
 Sunita Juneja  
 11387 Ajanta Ct  
 SD, CA 92129

SI25-1 Worst case movement at the Peñasquitos Drive/Cuca Street intersection currently operates at Level of Service (LOS) E in the AM peak hour (see EIR Table 5.2-5) and the project will have a significant impact at this intersection. With the signal proposed by the project for mitigation this intersection, it would operate at LOS A, representing the least congested condition. Please also see Response to Comment 15 from Commons (Letter SI5) relative to queuing. Relative to emergency egress, please see Response to Comment 2, below.

SI25-2 The project is not assessed as increasing fire risk. The project itself would be fire-resistive in its architecture and irrigated landscape. These features would provide a potentially stronger barrier than the existing on-site grasslands/non-irrigated trees currently provide for the adjacent existing Glens residents relative to fires approaching from the east. The project would also improve emergency vehicle access and emergency egress options (including upgrades to emergency access to/egress from Andorra Way), as described in Section 3.0 and analyzed in Section 5.14 of the EIR. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.

SI25-3 Please refer to the Response to Comment 13 from Commons (Letter SI5) for information regarding the definitions and enforcement of the 55+ age-qualified housing for the project, and the impact on schools.

## COMMENTS

## RESPONSES

SI25-4 Comment noted. This comment expresses the commenter's opinions, without specifically addressing the accuracy or adequacy of the EIR. For additional information on the topics raised, please refer to the Responses to Comments 1 and 2 above regarding improvements to traffic and emergency evacuation/lessened fire risk. Relative to the reasonable and feasible alternatives evaluated for the project, please refer to EIR Section 8.0, *Project Alternatives*.

## COMMENTS

## RESPONSES

**From:** [KK](#)  
**To:** [DSD-EAS](#)  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 5:47:39 PM

Dear Ms. Osborn,

I am writing with several questions related to the draft EIR for the Junipers project.

SI26-1

1. The EIR does not appear to take into account the Millennium PQ project (where the Karlan Hotel used to be). There are three projects included in the "Near Term" scenarios, but the Millennium PQ project, which is closest to the proposed project and will likely have the biggest impact, is not one of them. Given the Millennium PQ project, what will the impact of the Junipers project be on  
 - safety (specifically evacuation routes during an emergency)?  
 - traffic?  
 - environmental outcomes?

Without the inclusion of the Millennium PQ project in the Near Term scenarios, the draft EIR is incomplete and inaccurate.

SI26-2

2. Page 5.2-17 indicates that the allowable threshold for added delay is 2.0 seconds. However, there are several instances in Table 5.2-7 where the increase in delay is greater than 2.0 seconds but the impact is not listed as significant (e.g., Intersection 2, Intersection 5). Why are these increases in delay of greater than 2.0 seconds not considered significant?

SI26-3

3. On page 5.2-25, it is stated that implementation of a traffic signal is the applicant's preferred option for intersection #6 because a roundabout would impact a portion of the Hotel Karlan property. Given the Millennium PQ project, is a traffic signal still the best option? Should the applicant's preference be the determining factor, or should the impact on traffic and safety take precedence?

Sincerely,  
 Kirsten Kung

14723 Penasquitos Drive  
 San Diego, CA  
 92129

SI26-1 The EIR for the proposed project addresses cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.

SI26-2 The comment is correct that the 2.0 second threshold is mentioned on page 5.2-17. Please see Section 5.2.2.1, *Impact Thresholds*, which clarifies that the Level of Service (LOS) also must be LOS E or F after addition of project traffic to be considered a significant project impact. "Any intersection, roadway segment, or freeway segment affected by the project would operate at LOS E or F under either direct or cumulative conditions, and the project exceeds the thresholds shown in Table 5.2-3, *Traffic Impact Significance Thresholds*." Table 5.2-3 then indicates delay thresholds (in seconds) for freeways, metered ramps, intersections and roadway segments. If an intersection operates at an acceptable LOS after addition of project traffic, even with delay exceeding the 2.0 second threshold, a significant impact would not occur. In the example cited, Table 5.2-7 indicates that intersections 2 (Carmel Mountain Road and I-15 Northbound Ramps) and 5 (Carmel Mountain Road and Peñasquitos Drive) would operate at LOS C/D and C/C in the AM/PM peak hours, respectively. Both LOS C and LOS D represent acceptable LOS.



## COMMENTS

## RESPONSES

SI26-3 Please refer to the Response to Comment 20 from Haight A (Letter SI3A) for information regarding traffic signal and roundabout operation.

## COMMENTS

## RESPONSES

**From:** Lew Valerie <vlew@sandi.net>  
**Sent:** Sunday, February 23, 2020 3:07 PM  
**To:** DSD EAS  
**Subject:** JUNIPERS PROJECT is a SAFETY ISSUE Project #586670

Dear Ms. Sara Osborn,

I would like to voice my concern over the proposed Junipers Project change from "open space" to "residential" land use. I have read portions of the 600-something paged report and I have my personal experience to counter the claims that the redevelopment of this land will result in "less than significant" environmental impacts. I have lived in this neighborhood since 1991 and we have been evacuated at least three times due to fires over the course of that time. We've had the fire department come out and look on our street (Paymogo Street) and decide which houses they'd let burn and which houses they'd save. There is an actual plan to allow the last three houses on our cul-de-sac burn should a fire happen threatening the homes on our street.

This community will be devastated with the traffic congestion, not to mention the real possibility of homes and lives lost should there be a fire with the zoning changes proposed. The egresses mentioned will not prevent this from happening. The egress on Andorra Way was once useable before they cemented the poles into the ground. Even with that access, it was difficult to get through, plus the fireman that one of our neighbors talked to during the 2007 fires didn't even know that it was there. In a true emergency, we'd experience a true bottleneck at the base of Penasquitos Drive with the additional development proposed. PLEASE DO NOT LET THIS GO THROUGH.

Sincerely,  
 Val Lew  
 15585 Paymogo Street  
 San Diego, CA 92129

858-335-9755

SI27-1

SI27-2

SI27-1 Comments noted.

Fire and evacuation safety are addressed in Section 5.14 of the EIR, with specific discussion of emergency vehicle access (police and fire) as well as evacuation. Project implementation would result in a reduction in the estimated Glens community evacuation time following notification as described in EIR Section 5.14, *Health and Safety*, and the Response to Comment 1 from Derbique (Letter SI4).

The reduction in evacuation time that would result from project implementation also would be expected to be realized for residents of Paymogo Street, because of the added evacuation routes including the nearby, ungraded, Andorra Way evacuation route, and the ability to evacuate more vehicles per hour from the greater Glens community.

The remainder of the comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.

SI27-2 Specific to the existing connection to Andorra Way, it is acknowledged that there is an existing bollarded emergency access at this location. This existing access has been deemed by SDFRD as unreliable due to the condition of the bollards, road condition, and adjacent vegetation. This route has not been open to the community during emergencies, and does not provide a managed and maintained paved surface or cleared vegetation conditions needed for reliable use and to best support emergency vehicles. The project would make improvements to these conditions. Please refer to

## COMMENTS

## RESPONSES

SI27-2 (cont.) Section 5.14.4 of the EIR and EIR Appendix K4, Wildland Fire Evacuation Plan, for additional information. Please also refer to the Response to Comment 1 from Derbyque (Letter SI4) regarding the improvements that are proposed to upgrade emergency access.

## COMMENTS

## RESPONSES

**From:** [magicgeniel@aol.com](mailto:magicgeniel@aol.com)  
**To:** [DSD FAS](#)  
**Cc:** [Peterson, Jeff](#); [rrpb.chair@gmail.com](mailto:rrpb.chair@gmail.com); [JRazvi@san.rr.com](mailto:JRazvi@san.rr.com)  
**Subject:** [EXTERNAL] Comments on "The Junipers Project No. 586670/SCH No. 2018041032"  
**Date:** Sunday, April 05, 2020 6:56:31 PM

Ms Osborn

Penasquitos action group Environmental Impact Report

SI28-1

How is the space at Janal deemed large enough to accommodate a roundabout to improve traffic control and movement of cars, trucks, motor homes and larger vehicles? These are typical kinds of vehicles seen in suburban neighborhoods like Penasquitos. I have lived in Seattle where small roundabouts were utilized efficiently to eliminate stop signs on 4 adjacent corners. And I've used roundabouts in large cities where many cars can move at the same time. But I don't see this area begin to be large enough for this purpose, even looking at your model with proposed measurements. And how can emergency vehicles like fire trucks navigate a small area like this? What about something as large as a hook and ladder truck? I fear for any emergency we have like a fire where equipment access is needed. (Page 108)

SI28-2

How are more cars added to this area going to make the corner of Carmel Mountain Drive and Penasquitos Drive safer than it is now? We experience bad accidents on this corner alone on a weekly basis. Many times accidents appear to be caused by speeding cars, others from people just running red lights or speeding up so they can beat the signal change. (Page 238)

SI28-3

Is Penasquitos Drive really a four lane road, 2 lanes in each direction. The answer is no. Some years ago it was transformed to one lane each direction with a bike lane and a center divide to slow traffic down. There were many fewer cars back in those days. Now it simply slows vehicles in high traffic hours of the day. With the Proposed plan I see dangerous conditions in emergency situations. (page 234)

SI28-4

How is it considered safe to evacuate this large area of residences and schools in a time frame of 3-8 hours? Many homes have more than one vehicle to get out of the area. If a fire happens during the day it was stated no cars, buses would be allowed into Penasquitos. How do you evacuate schools without first getting busses into appropriate areas? (Page 212)1

SI28-5

I'm asking you to reconsider the building out of what has been a lovely quiet family oriented neighborhood to a community with too much traffic.

Concerned Senior Citizen (we have lived here 44 years and raised our family)  
 Genie Lovorn  
 14895 Penasquitos Ct

SI28-1 The roundabout would be installed completely within existing City public right-of-way or on the project property and would be constructed in compliance with appropriate design standards, including design to accommodate emergency vehicles. Please see Figure 3 12e of the EIR, which depicts the roundabout. As shown, the project will dedicate right-of-way for the roundabout. Also as shown, the larger fire apparatus would traverse the center of the roundabout (fire truck apron) through provision of central hardscape.

SI28-2 The EIR addresses safety of proposed project improvements in Section 5.2.3, *Impact 2: Potential for Traffic Hazards*. As shown on Tables 5.2-7 and 5.2-9, the Peñasquitos Drive and Carmel Mountain Road intersection is projected to operate at an acceptable Level of Service (LOS) C, under both Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions. EIRs are not required to assume that individuals may break the law or misbehave, per se. Relative to effects of the project on this intersection, and traffic approaching it, the project would be expected to slow vehicles approaching the intersection from the northeast. This would begin with the roundabout at the intersection of Peñasquitos Drive and Janal Way, and would be reinforced by the signal at Peñasquitos Drive and Cuca Street. These features would provide traffic controls along Peñasquitos Drive that do not currently exist.

## COMMENTS

## RESPONSES

- | COMMENTS | RESPONSES   |
|----------|---|
|          | <p>SI28-3 The original design and current lane configuration of Peñasquitos Drive as stated in the comment is generally consistent with the description in EIR Section 5.2.1.1.</p> <p>SI28-4 The project would not result in any significant impacts to street segments along Peñasquitos Drive, as shown in Tables 5.2-6, 5.2-8 and 5.2-10 of the EIR. Please refer to the Response to Comment 1 from Derbyshire (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan. As noted, project implementation would not adversely impact emergency evacuations, and would instead result in a benefit to the overall Glens community with respect to this issue.</p> <p>SI28-5 Comment noted. This comment does not address the adequacy or accuracy of the EIR and no response is required.</p> |

## COMMENTS

## RESPONSES

From: [tomlovorn@aol.com](mailto:tomlovorn@aol.com)  
 To: [DSD\\_FAS](#)  
 Cc: [Peterson\\_Jeff\\_rpdb.chair@gmail.com](mailto:Peterson_Jeff_rpdb.chair@gmail.com); [JRazvi@san.r.com](mailto:JRazvi@san.r.com)  
 Subject: [EXTERNAL] Comments on "The Junipers Project No.586670/SCH No.2018041032"  
 Date: Sunday, April 05, 2020 6:31:06 PM

Ms Osborn,

These are my comments on the The Junipers Project No. 586670/SCH 2018041032:

SI29A-1

1. Data on Existing Traffic Volumes was collected on **Feb 6, 2018 (TIA pg 9)**. One day of traffic data in Rancho Penasquitos (RP) cannot adequately describe traffic conditions in RP. That's akin to using one day of weather to describe annual weather in San Diego. This one day of data is the empirical basis for RP for the entire traffic analysis. The report was publish just in time because such data should not be more than 2 years old (**DOT 4/17/2018 letter to Mr Brunette**). **The TIA must collect a statistically representative set of annual traffic data and use its averages and variation to update the TIA accordingly.**

**Why didn't the contractor collect a representative set of traffic data throughout the year instead of just one day in Feb 2018?**

SI29A-2

2. A capacity of 22500 vph for Penasquitos (PQ) Drive was used in a number of Tables (e.g. **Table 6-2 Existing Daily Segment Operations**) and was justified as an average of the 2 and 1 lane capacity  $((30000+15000)/2=22500)$ . Though consistent with improvements stated in the RP Community Plan, the calculations must be revised to use only 15000 vph because that's more consistent with how PQ Drive is used and there doesn't seem to be a real basis for increasing it to 22500 for the analysis. In addition, no one uses PQ Drive as a modified four-lane road. If it were used as such in an emergency, it would soon become a 1-lane southbound as vehicle accidents or breakdowns would block at least one southbound lane. **This will increase the v/c ratio for PQ Drive throughout the report and probably affect any v/c dependent triggers.**

**How do you justify increasing the capacity of PQ Drive from historical 15000 vph to unwarranted 22500 vph? How does reducing it from 22500 back to 15000 vph affect the triggers and conclusions of the TIA?**

SI29A-3

3. I believe the queue lengths during peak traffic after mitigation with a Roundabout (RA) would be unacceptable. It's a matter of throughput at the RA. Based on **TIA Appendix C 2/6/2018 data for Janal to Cuca** without the RA, average peak 7-9 AM traffic southbound on PQ Drive north of Jamal Way is 686 vph = 11.4 vpm (lets round down to 11 vpm). The delay time through the Jamal Way intersection **with RA** is 8.5 spv (**TIA Table 17-1 page 67**). I know an RA slows the traffic because I've driven around many RAs. So the throughput at the RA intersection is 60 spm/8.5 spv = 7 vpm. Therefore the vehicle queue is accumulating at a rate of  $11-7 = 4$  vpm or 240 vph. After 1 hour at 25 fpv (**TIA Table 17-1 page 67**) the queue is 6000 ft = 1.13

SI29A-1 Existing conditions data were gathered in accordance with City traffic guidelines. The City of San Diego Transportation Impact Study Manual (July 1998) provides the study parameters for conducting traffic studies. Per the manual, there is no requirement on the number of days of data used in the traffic analysis. Industry standards of practice are to conduct weekday counts over a 24-hour period for roadway segment and AM and PM peak hour traffic counts for intersections during adjacent street peak periods (typically between 7:00-9:00 AM and 4:00-6:00 PM commute timeframes when the school year is in session). The use of "peak hour" periods therefore assesses when traffic congestion is greatest (worst-case), and then identifies mitigation to address that worst-case level of impact. Therefore, projects are required to mitigate for impacts that may actually occur for only a very short period of time in each 24-hour period, and therefor provides a conservative assessment.

SI29A-2 Please note that road segment capacity is not based on vehicles per hour, as stated in the comment, but on average daily traffic. All segments operate within acceptable Level of Service (LOS) categories. In addition to the overall segment capacities being able to acceptably carry existing and projected traffic, intersections can provide indications of how well segments are operating based on how well the intersections can accommodate vehicle traffic moving through them. All intersections, even with addition of cumulative



## COMMENTS

## RESPONSES

	<p>SI29A-2 (cont.) projects would operate within acceptable LOS with implementation of project mitigation (Mitigation Measures TRA-1 and TRA-2, in EIR Section 5.2.2.4) at the Cuca Street and Janal Way intersections with Peñasquitos Drive.</p> <p>The cross-sections of Peñasquitos Drive were designed to accommodate four travel lanes. Within the study area, Peñasquitos Drive is a two-lane road that has been enhanced to provide a raised median and a three-lane section south of Cuca Street. Per the EIR Transportation Impact Analysis (TIA), modified roadway capacities associated with the current functional classifications were used in the analysis to represent the capacity-enhancing improvements that have been completed. For the divided two-lane section north of Cuca Street, an enhanced LOS E capacity of 22,500 ADT was used. This blends the 30,000 ADT LOS E capacity of a Four-Lane Collector with the 15,000 ADT LOS E capacity of a two-lane road, with the enhancement provided through the 12-foot-wide raised median which restricts turning movements.</p> <p>For the segment south of Cuca Street, an enhanced 30,000 ADT LOS E capacity was used. A Four-Lane Major Road provides a 40,000 ADT LOS E capacity assuming 10,000 ADT per lane. However, per the Rancho Peñasquitos Public Facilities Financing Plan (PFFP), the road is built as a “modified” major. The roadway provides two southbound travel lanes divided by a two way left-turn lane, which transitions to three lanes at the intersection of Carmel Mountain Road, and one northbound travel lane. Thus, a capacity of 30,000 ADT was used in the analysis.</p> <p>The application of these capacities is consistent with the buildout traffic volumes in the Community Plan and those forecasted for the Year 2050 cumulative analysis. Additional analysis assuming 15,000 capacity is not required.</p>
--	---

## COMMENTS

## RESPONSES

SI29A-3  
cont.

miles long. Actually, it will be longer because peak traffic lasts 2 hour at rate. Once the traffic is past peak time, the input will be at a slower rate and the queue will begin to clear. My estimate is that it may take several hours to clear. **So, contrary to the conclusion of the TIA that the Janal Way intersection will operate at LOS A (Table 17-2), there will be a sever negative impact to PQ Drive and connecting side roads upstream from Janal Way when the RA is included.** The queue blocks exit to PQ Drive from PQ Court and several other side roads. Also, I have not done the analysis for the stop light at Cuca as it's more complicated but I'm concerned that, contrary to the **TIA (125 ft at 95% Table 17-1)**, the queue length will extend from Cuca to the RA during peak traffic. Further investigation and analysis is warranted. The analysis should include queue length on both sides of Janal Way and Cuca intersections during both North and South peak traffic and off-peak times of day plus the time it takes for the queues to clear.

vph=vehicles per hour, spv=seconds per vehicle, vpm=vehicles per minute

(Note: TIA page 57 says Intersection #7 will operate at LOS B but Table 17-2 says LOS A)

**What is the predicted queue length on both sides of Janal Way and Cuca intersections during both North and South peak traffic and off-peak times of day and how long does it take to clear the queues?**

**In conclusion, the Traffic Study in the EIR is deeply flawed in the use of incorrect data and assumptions to arrive at a conclusion that only benefits the developer, and puts the entire neighborhood at risk both as a result of daily altered traffic patterns, as well putting the residents of this land locked community's lives at risk during emergency evacuations. The City Planners should reject this flawed TIA in its entirety!**

Respectfully,  
Tom Lovorn  
14895 Penasquitos Ct  
San Diego. CA 92129

SI29A-3 The comment assumes that a delay of 8.5 sec/veh is the same as capacity, which is not accurate. Intersection control delay as defined by the Highway Capacity Manual (HCM) is the average delay per vehicle imposed by a traffic control device as compared to free flow conditions. Control delay is the time spent by each vehicle at the intersection once the vehicle arrives there. It includes initial deceleration time, queue move-up time, stopped delay, and final acceleration delay. It is not the rate at which vehicles are processed or the rate they clear an intersection, as assumed in the comment.

The Synchro software analysis sheets (based on the HCM model) in Appendix L of the EIR Transportation Impact Analysis (TIA) show an approach volume at Peñasquitos Drive/Janal Way of 788 SB vehicles in the AM peak hour and a capacity of 1,272 veh/hour. The capacity takes into account the time for each vehicle to yield to other traffic in the roundabout and other geometric factors. The analysis shows that the volume to capacity ratio for this movement is 0.62 with a delay of 10.6 sec/veh. This is LOS B with a 95th percentile queue of 5 vehicles.

As a measure of comparison, the delay for Peñasquitos Drive traffic at the Carmel Mountain Road traffic signal is 19.6 sec (eastbound approach). Therefore, on average drivers will wait longer there than at the roundabout. The controlling factor for Peñasquitos Drive in the morning is the signal at Carmel Mountain Road.

Based on the calculations in the TIA (Appendix B of the EIR) showing 95th percentile queue lengths of five vehicles, or 125 feet, the queue from southbound traffic approaching Janal Way would not block vehicles from Peñasquitos Court, located about 700 feet north of the intersection.

## COMMENTS

## RESPONSES

SI29A-3 (cont.) Queues for Cuca Street are calculated at 210 feet in the southbound direction, as shown in the EIR traffic study Table 17-1 for Opening Day (2020) Plus Project (Near-term) conditions. The Cuca Street intersection with Peñasquitos Drive is approximately 590 feet south of Janal Way. Thus, queues from Cuca Street would not be expected to affect operations at Janal Way.

The EIR TIA evaluates the weekday peak hours within 7-9 AM and 4-6 PM timeframes for analysis per the City of San Diego Traffic Impact Study Manual since these are expected to represent “worst case” conditions in the immediate vicinity.

The reference to LOS B on page 57 was a typographical error. Table 17-2 showing LOS A for the intersection is correct.

Table 17-2 of the EIR TIA shows the calculated north- and southbound queues at both the Cuca Street and Janal Way intersections with Peñasquitos Drive for Horizon Year (2050) Plus Project. Appendix L of the EIR Traffic Study provides the delay in seconds for each approach. As shown in these documents, the southbound queues at Peñasquitos Drive with Janal Way would be 150 feet/25 feet in the AM/PM peak hours, with LOS A/A operations, respectively. For the northbound direction, queues at this location would be 25 feet/100 feet in the AM/PM peak hours, with LOS operations for both approaches. The LOS A/A results represent very good operations which indicate vehicles are clearing through queues at an unimpeded rate.

At Peñasquitos Drive with Cuca Street, the southbound queues would 226 feet/107 feet in the AM/PM peak hours, with LOS A/A operations, respectively. For the northbound direction, queues at this location would be 191 feet/425 feet in the AM/PM peak hours, with LOS A/A operations, respectively. Additional traffic analysis is not necessary.

## COMMENTS

## RESPONSES

SI29A-3 (cont.) Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.

## COMMENTS

## RESPONSES

**From:** tomlovorn@aol.com  
**To:** DSD-EAS  
**Cc:** Peterson, Jeff; rppb.chair@gmail.com; JRazvi@san.rr.com  
**Subject:** [EXTERNAL] Fwd: Comments on "The Junipers Project No.586670/SCH No.2018041032"  
**Date:** Monday, April 06, 2020 12:31:31 PM

The following questions are an addendum to the previous Apr 5 input below:

Throughout the analysis (e.g. Tables 8-2 pg 161 and 10-2 pg 172 of TIA) the Average Daily Traffic (ADT) is used in the analysis to establish the LOS for a segment and intersection. However, that approach does not account for the potential for severe degrading of the LOS during **peak hour traffic** conditions, a condition which we will have to confront on a daily basis.

**What are the LOS ratings of the various segments and intersections under peak hour conditions and how long does it persist at that rating past peak hour traffic?**

The trip distribution assignment (pg 25 TIA) was based on "professional engineering judgment". That judgement needs to be validated with statistically sampled traffic conditions through out the year because this input affects the analysis and conclusions throughout the TIA.

**Are there plans to collect the required traffic data? If so, when? If not, why not?**

-----Original Message-----

From: tomlovorn <tomlovorn@aol.com>  
 To: DSDEAS <DSDEAS@sanidiego.gov>  
 Cc: japeterson <japeterson@sanidiego.gov>; rppb.chair <rppb.chair@gmail.com>; JRazvi <JRazvi@san.rr.com>  
 Sent: Sun, Apr 5, 2020 6:31 pm  
 Subject: Comments on "The Junipers Project No.586670/SCH No.2018041032"

Ms Osborn,

These are my comments on the The Junipers Project No. 586670/SCH 2018041032:

1. Data on Existing Traffic Volumes was collected on **Feb 6, 2018 (TIA pg 9)**. One day of traffic data in Rancho Penasquitos (RP) cannot adequately describe traffic conditions in RP. That's akin to using one day of weather to describe annual weather in San Diego. This one day of data is the empirical basis for RP for the entire traffic analysis. The report was publish just in time because such data should not be more than 2 years old (**DOT 4/17/2018 letter to Mr Brunette**). **The TIA must collect a statistically representative set of annual traffic data and use its averages and variation to update the TIA accordingly.**

SI29B-1 The comment is correct that roadway segments are evaluated in terms of average daily traffic. Overall roadway function is addressed through daily segment Level of Service (LOS) combined with intersection flow. As shown in EIR Section 5.2, the capacity shows what the road design is projected to accommodate, and the intersection function at peak hours demonstrates how traffic is moving through the intersection (and along the adjacent segments).

The LOS ratings of the various segments show acceptable capacity in the existing, Opening Day (Near-term) 2020, and Horizon Year 2050 conditions, as shown in the technical study and on EIR Tables 5.2.2, 5.2-6, 5.2-8 and 5.2-10. Intersections for which the project would make a meaningful contribution generally would operate at acceptable LOS during peak hours. Where they currently fail, or would fail with project contribution (at Peñasquitos Drive intersections with Cuca Street and Janal Way, respectively), mitigation would be implemented by the project. With the mitigation, both intersections would operate at LOS A in both AM and PM peak hours. Peak hours define the greatest flow periods.

SI29B-2 Please refer to the Response to Comment 5 from Chiu (Letter SI2) regarding the trip distribution methodology used for the project Traffic Impact Analysis and to Response to Comment 1 from Cicchelli (Letter SI9) regarding existing traffic counts.

## COMMENTS

## RESPONSES

**Why didn't the contractor collect a representative set of traffic data throughout the year instead of just one day in Feb 2018?**

2. A capacity of 22500 vph for Penasquitos (PQ) Drive was used in a number of Tables (e.g. **Table 6-2 Existing Daily Segment Operations**) and was justified as an average of the 2 and 1 lane capacity  $((30000+15000)/2=22500)$ . Though consistent with improvements stated in the RP Community Plan, the calculations must be revised to use only 15000 vph because that's more consistent with how PQ Drive is used and there doesn't seem to be a real basis for increasing it to 22500 for the analysis. In addition, no one uses PQ Drive as a modified four-lane road. If it were used as such in an emergency, it would soon become a 1-lane southbound as vehicle accidents or breakdowns would block at least one southbound lane. **This will increase the v/c ratio for PQ Drive throughout the report and probably affect any v/c dependent triggers.**

**How do you justify increasing the capacity of PQ Drive from historical 15000 vph to unwarranted 22500 vph? How does reducing it from 22500 back to 15000 vph affect the triggers and conclusions of the TIA?**

3. I believe the queue lengths during peak traffic after mitigation with a Roundabout (RA) would be unacceptable. It's a matter of throughput at the RA. Based on **TIA Appendix C 2/6/2018 data for Janal to Cuca** without the RA, average peak 7-9 AM traffic southbound on PQ Drive north of Jamal Way is 686 vph = 11.4 vpm (lets round down to 11 vpm). The delay time through the Jamal Way intersection **with** RA is 8.5 spv (**TIA Table 17-1 page 67**). I know an RA slows the traffic because I've driven around many RAs. So the throughput at the RA intersection is 60 spm/8.5 spv = 7 vpm. Therefore the vehicle queue is accumulating at a rate of  $11-7 = 4$  vpm or 240 vph. After 1 hour at 25 fpv (**TIA Table 17-1 page 67**) the queue is 6000 ft = 1.13 miles long. Actually, it will be longer because peak traffic lasts 2 hour at rate. Once the traffic is past peak time, the input will be at a slower rate and the queue will begin to clear. My estimate is that it may take several hours to clear. **So, contrary to the conclusion of the TIA that the Janal Way intersection will operate at LOS A (Table 17-2), there will be a sever negative impact to PQ Drive and connecting side roads upstream from Janal Way when the RA is included.** The queue blocks exit to PQ Drive from PQ Court and several other side roads. Also, I have not done the analysis for the stop light at Cuca as it's more complicated but I'm concerned that, contrary to the **TIA (125 ft at 95% Table 17-1)**, the queue length will extend from Cuca to the RA during peak traffic. Further investigation and analysis is warranted. The analysis should include queue length on both sides of Janal Way and Cuca intersections during both North and South peak traffic and off-peak times of day plus the time it takes for the queues to clear.

vph=vehicles per hour, spv=seconds per vehicle, vpm=vehicles per minute

(Note: TIA page 57 says Intersection #7 will operate at LOS B but Table 17-2 says LOS A)

**What is the predicted queue length on both sides of Janal Way and Cuca intersections during both North and South peak traffic and off-peak times of day and how long does it take to clear the queues?**

SI29B-2 (cont.) As noted in the introduction to the comment letter, the comments above are addenda to your letter of April 5. The remainder of the letter consists of the April 5 submittal, which is responded to immediately above in this file.



COMMENTS

RESPONSES

**In conclusion, the Traffic Study in the EIR is deeply flawed in the use of incorrect data and assumptions to arrive at a conclusion that only benefits the developer, and puts the entire neighborhood at risk both as a result of daily altered traffic patterns, as well putting the residents of this land locked community's lives at risk during emergency evacuations. The City Planners should reject this flawed TIA in its entirety!**

Respectfully,  
Tom Lovorn  
14895 Penasquitos Ct  
San Diego, CA 92129

## COMMENTS

## RESPONSES

**From:** [Nels Lundgren](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Attention to Sara Osborn, Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 5:21:58 PM

Subj : Junipers project EIR Review and Comment  
 From : Nels Lundgren, 14421 Yazoo St, San Diego CA 92129, 858-395-6202

Reference S.1.1 Project Location and Setting, pg S-1 and 2.3 Surrounding Land Uses, pg 2-2:

SI30-1

The existing conditions and the surrounding area has changed since this draft was submitted. Specifically the Hotel Karlan to the south is being demolished and replaced by the Millenium PQ project consisting of 331 condominiums. In addition, a new housing project, Pacific Villages (601 units) to the southwest, along Carmel Mountain Road is under constructions. Considering these projects, within .5 miles of the Junipers, an additional 1,468 units (536 Junipers + 331 Millenium PQ condominiums + 601 Pacific Villages) are being added to an existing community of 1,865 units (1214 Glens single family homes + 224 Hills apartments + 67 Penasquitos Townhome + 360 Cresta Bella apartments) without significant improvements to infrastructure; mainly the safety of the road system into and out of the community. How does this report and the traffic survey performed on February 6, 2018 take into account the cumulative affect of nearly doubling the number of residential units to this neighborhood; specifically in terms of transportation/traffic, health and safety? Will an updated traffic study be performed focusing on the Carmel Mountain Rd traffic during peak hours once the Pacific Villages project is completed and occupied?

Reference S.1.2 Project Objectives, pg S-2 and 3.1 Project Goals and Objectives, pg 3-1 :

SI30-2

Goal and Objective 1 "Address the City's housing supply needs by providing an expanded residential footprint which includes both for-sale market rate and for rent affordable age-qualified (55+) residences.". Please clarify how it will be enforced to ensure the residences are owner occupied and the occupants are age 55+?

Reference Table 3-2, pg 3-20 :

SI30-3

"To limit the maximum density for the project site to be equal to the proposed project density, thereby ensuring that any future proposal to construct a project with a higher density would require a discretionary action".

What is a discretionary action; does it require city board vote/approval or is it less formal and easier to obtain?

Reference pg 5.1-38 :

SI30-4

"Glens Neighborhood Planning Element, Page 37: Revise to increase the ultimate number of multi-family units in the Glens neighborhood from 291 to 827".

Will that Planning Element need to be further modified to account for the Millenium PQ project (Hotel Karlan redevelopment)?

SI30-1 The existing traffic of the Glens community (with the single-family and multi-family homes including Cresta Bella apartments) comprised the existing conditions traffic volumes and conditions shown on EIR Tables 5.2-1 and 5.2-2 for intersections and roadway segments, respectively. The effect of the project's traffic on existing conditions data is shown on EIR Tables 5.2-5 and 5.2-6 for intersections and street segments, respectively. Three cumulative projects were combined with projected project traffic; Pacific Village, noted in the comment, as well as Merge 56 and The Preserve at Torrey Highlands. Projected Opening Day (2020) Plus Project with all four projects (as well as existing traffic), are reflected as Near-term on Tables 5.27 and 5.2-8 for intersections and roadway segments, respectively.

As shown on those tables, the proposed project and the three cumulative projects would not result in any significant impacts to roadway segments. The project would result in a significant impact at two intersections, and mitigation has been proposed that would result in an improved Level of Service (LOS) when compared to the existing condition. As shown on EIR Table 5.2-1, the worst-case movement at the Peñasquitos Drive/Cuca Street intersection currently operates at LOS E during the AM peak hour and would become LOS F with project implementation. This would be improved by installation of a signal at that intersection as mitigation. As a result, operations would improve to LOS A, which represents the least congested condition.

## COMMENTS

## RESPONSES

	<p>SI30-1 (cont.) Similarly, although the worst-case movement at the Peñasquitos Drive and Janal Way intersection currently operates at an acceptable LOS C, this would worsen to LOS E in the AM peak hour with project traffic. With the proposed roundabout mitigation, that intersection also would operate at LOS A for both Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions. The project would not result in significant impacts at any other studied intersections or roadway segments. Please see Tables 5.2-5 through 5.2-10, respectively. Operations for the two noted intersections with mitigation (LOS A in both the Near-term and Horizon Year conditions) are shown on Tables 5.2-12 and 5.2-13, respectively.</p> <p>Please note that Millennium PQ was not known in April 2018 at the time of issuance of The Junipers Notice of Preparation of an Environmental Impact Report, when the environmental baseline was set and the list of cumulative projects was identified. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional discussion.</p> <p>Regarding the health and safety element of this question, please refer to Response to Comment 13, below, which responds to a similarly focused comment on this issue.</p> <p>SI30-2 Please refer to the Response to Comment 13 from Commons (Letter SI5) for information regarding the definitions and enforcement of the 55+ age-qualified housing for the project.</p> <p>SI30-3 Please refer to the Response to Comment 16 from Haight (Letter SI3A) for additional information regarding CPIOZ.</p> <p>SI30-4 This comment addresses a different project other than the proposed project, and does not address adequacy or accuracy of analyses in the Draft EIR. No response is required.</p>
--	---

## COMMENTS

## RESPONSES

<p>SI30-5</p> <p>Reference pg 5.2-1 :</p> <p>"No freeway mainline locations were analyzed because the project is not expected to add 50 or more peak hour trips to I-15. In addition, freeway ramp meters were not evaluated as the project is not expected to add 20 or more peak hour trips to any metered ramps."</p> <p>Please explain the assumptions and analysis that led to this statement; I've read Appendix B Traffic Report and believe it is based on convenient, possibly false assumptions (e.g. 1.7 persons per household)?</p>	<p>SI30-5 Please refer to the Response to Comment 2 from DeLano (Letter SI1) for an explanation of the trip generation rate used for the project Transportation Impact Analysis.</p>
<p>SI30-6</p> <p>Reference Table 5.2-1 :</p> <p>This table is missing the intersection at Carmel Mountain Rd and Gerana St, which has recently been changed from a Minor Street Stop-Controlled intersection to a Signal. In recognition of the cumulative affect of development in the Carmel Mountain Rd corridor, will this study be updated after the Pacific Villages development on the south side of Carmel Mountain Rd is completed and occupied, before conclusions can be drawn?</p>	<p>SI30-6 As stated in EIR Section 5.2.1.1, intersections analyzed in the Transportation Impact Analysis and EIR were chosen based on City standards and whether or not the project would contribute 50 peak hour trips to that intersection. Also, please note that cumulative traffic from the Pacific Village project is addressed in the EIR; it was included in the Opening Day (2020) Plus Project (Near-term) traffic analyses (refer to Response to Comment 1, above).</p>
<p>SI30-7</p> <p>Reference 5.2.2.2, pg 5.2-9 and pg 5.2-10:</p> <p>"The trip generation for all 536 proposed housing units was calculated using the City of San Diego Trip Generation Manual (2003) trip generation rate for "Retirement/Senior Citizen Housing."</p> <p>The Near-term conditions in the Traffic Congestion study neglects the Millenium PQ project which is replacing the Hotel Karlan with 331 condos. Will the study be updated to include the impact of the Millenium PQ project and will it address the additional traffic hazards resulting from increased traffic on Cuca St?</p>	<p>SI30-7 Please refer to the Response to Comment 5 from DeLano (Letter SI1).</p>
<p>SI30-8</p> <p>Reference pg 5.2-11:</p> <p>"Using the above-mentioned assumptions, approximately 20 percent of the daily project trips were regionally distributed on I-15 to the north, with 25 percent to the south and 11 percent oriented to/from the west on SR-56. The remaining 44 percent were distributed to the local network. A small amount of project-related traffic may make use of Cuca Street and Janal Way to access destinations further to the west via Carmel Mountain Road. The incentive to use either of these roadways as cut-through routes for destinations is low, given the good traffic operations along the main roadways (LOS C on Peñasquitos Drive, LOS A on Carmel Mountain Road between Cuca Street and Peñasquitos Drive, LOS C during AM/PM peak hours at Carmel Mountain Road/Peñasquitos Drive intersection). In general, Cuca Street is more direct, with fewer fronting land uses, and as such, 3 percent of project traffic was distributed via this roadway. Janal Way is less likely to be used because it is more steep and circuitous. This is borne out by the existing peak hour turning movement volumes, which show a total of 7 AM and 5 PM peak hour trips between Janal Way and the entirety of the development served by Peñasquitos Drive to the north."</p> <p>I do not agree with the assumed low levels of traffic diverted along Janal Way and Cuca St, and for reasons stated here ("steep and circuitous") increased traffic on Janal Way would pose a danger to the community. How was the percent of traffic diverting to Cuca St and Janal Way arrived at, and did it take into account the planned modifications of a round-about and traffic light at these intersections? The Millenium PQ project will further exasperate the traffic problem on Penasquitos Dr and at the intersection with Carmel Mountain Rd, encouraging drivers to use alternate routes through neighborhoods not designed for it. Will the traffic study be updated to account for the Millenium PQ project and mitigation be considered to discourage traffic along Cuca St and Janal Way?</p>	<p>SI30-8 The comment letter's disagreement with the study is noted. Please refer to the Response to Comment 5 from Chiu (Letter SI2) regarding the trip distribution methodology used for the project Transportation Impact Analysis.</p> <p>Please refer to Response to Comment 1, above, regarding projected traffic conditions and the anticipated achievement of LOS A conditions at both the Janal Way and Cuca Street intersections with Peñasquitos Drive, with project mitigation. Other mitigations may be possible, but these measures constitute the mitigation proposed by the project. As such, the project is not expected to result in diversion of substantial traffic onto side routes. Because of expected good level of service, additional mitigation is not required to discourage traffic along Cuca Street and Janal Way.</p>

## COMMENTS

## RESPONSES

<p>SI30-9</p> <p>Reference 5.2.3 Impact 2: Potential for Traffic Hazards, starting on pg 5.2-27:</p> <p>The impact analysis does not address the increased traffic travelling west on Cuca St which has poor line of sight qualities due to a bend and rise in the roadway and parking on both sides of the roadway. Cuca St also passes densely populated Cayon Rim apartments and Los Penasquitos Elementary School west of Gerana St. Additionally, the report does not address the hazards at the intersections of Cuca St with Janal Way and with Gerana St, which both have extremely poor line of sight conditions looking to the east. Will the Traffic Report be updated to consider traffic and intersections onto Cuca St taking into account the the topography, parking on Cuca, poor line of sight conditions and the speed at which vehicles travel on Cuca St? Will mitigations be proposed of safety purposes? If this is not addressed, I'm afraid that a tragedy will occur on this street after the new developments and resultant traffic increases.</p>	<p>SI30-9</p> <p>As noted above, the EIR and supporting Traffic Impact Analysis address street segments and intersections where a certain level of traffic associated with the project is expected to travel, per standard City analysis requirements. Gerana Street, and segments of Cuca Street north and south of the intersection with Gerana Street, were not included in that category. As indicated in the street segment analysis tables (EIR Tables 5.2-6, 5.2-8 and 5.2-10), project contributions to streets south of the project are projected to focus on southerly segments of Carmel Mountain Road, which more directly ties into additional freeway access. As such, additional review of Cuca Street segments is not required.</p>
<p>SI30-10</p> <p>Reference pg 5.2-28 :</p> <p>"Using a 10 mph speed reduction from 50 to 40 mph design speed, a deceleration lane length of 315 feet is recommended and within the standards of the HDM. At a minimum, the HDM recommends that space for two vehicles should be provided for queue storage (50 feet total). However, given this is a right-turn lane with no conflicting traffic movements and no traffic control device, there is no need for storage."</p> <p>Does the conclusion that two vehicle storage length is not needed in the Deceleration Lane take into account pedestrian and bicycle usage, crossing the entrance to the Junipers development?</p>	<p>SI30-10</p> <p>There is both a bicycle lane and sidewalk on Carmel Mountain Road at the right-turn in only entrance to the project from Carmel Mountain Road. Bikes and pedestrians crossing the entrance are anticipated to be sporadic (individuals accessing bus stops or shopping options in the vicinity of Peñasquitos Drive would turn right out of the project and travel southerly to the signalized intersection at Peñasquitos Drive). As such, it is not anticipated that the bike or pedestrian movements crossing the project entrance at Carmel Mountain Road would notably slow the vehicles turning right into the project, and additional storage would not be required.</p>
<p>SI30-11</p> <p>Reference 5.13.2 Impact 1: Potential for Inadequate Public Service Facilities, pg 5.13-8:</p> <p>"Pursuant to the density factor of 3.0 persons per household unit based on the Demographic and Socioeconomic Estimates for the RPCP from SANDAG (SANDAG 2018a) the project would increase the area's population by up to 1,608 persons. The project is a multi-family, age-restricted development, however, and a factor of 1.7 persons per household is more appropriate, based on the American Housing Survey (American Association of Retired Persons [AARP], 2011). Therefore, the population for the project's 536 housing units is estimated to be 911 persons."</p> <p>Many calculations in the traffic study and emergency evacuation study use this number and I find the assumption of 1.7 persons per household for a community of primarily 3 and 4 bedroom units is not a correct assumption. Can you please explain how this assumption is valid, considering the number of bedrooms per sizes of the market-rate units?</p>	<p>SI30-11</p> <p>Given that the project is an age-qualified (55+) community that would not be available to younger/larger families with children, the lower household size is more appropriate. Many 55+ households prefer a larger home in order to accommodate guests, home offices, hobbies, gyms, live-in care, etc.</p>
<p>SI30-12</p> <p>Reference pg 5.13-8 :</p> <p>"Although elderly persons may utilize emergency services at higher rates, it is assumed that those over 85, who have the highest usage, would no longer be living independently within The Junipers Project housing. Those over 65, who have higher rates than younger persons, could account for higher call volumes, but the increase is not considered to be substantially higher than the conservative estimate of 105 calls."</p> <p>If the age-appropriate restriction was 65+ instead of 55+ I'd believe it, but otherwise I find this to be another convenient assumption. Can you please substantiate this assumption and as previously asked address how the age-appropriate restrictions will be ensured?</p>	
<p>SI30-13</p> <p>Reference 5.14.3 Impact 2: Fire Risk, pg 5.14-14 and pg 5.14.-17:</p> <p>"The project also would improve accessibility for emergency vehicles to/from the site and surrounding</p>	

## COMMENTS

## RESPONSES

	<p>SI30-12 As stated in EIR Appendix K5, the City-wide per capita call volumes, upon which the estimated project call volume is based, also include a variety of neighborhood densities and activity centers, including dense urban city center areas, which tend to have much higher call volumes than suburban neighborhoods such as the project. Specifics regarding project call assumptions are provided in EIR Section 5.13.2 under the heading Fire and Life Protection, as well as in the Evacuation Plan Section 5.1.2. The information about the conservative basis of the analysis has been added into the FEIR in Section 5.13.</p> <p>Please refer to Response to Comment 2, above, regarding age-qualification restrictions.</p> <p>SI30-13 Please refer to the Response to Comment 1 from Derbique (Letter S14) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>Congestion at the noted points of connection to Carmel Mountain Road would be eased by providing entry onto Carmel Mountain Road at two different locations (not solely through Peñasquitos Drive), and by providing another exit that does not access Carmel Mountain Road at all. The overall proposed condition therefore includes the additional egress routes and access route enhancements proposed by the project that are anticipated to result in a substantial reduction in evacuation time.</p>
--	--



## COMMENTS

## RESPONSES

SI30-13 cont.	<p>Glens neighborhood through provision of additional or upgraded travel routes, to be used by project and area residents as well as emergency vehicles (Dudek 2019b)."</p> <p>"In the proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, the evacuation travel timeframe for the Glen's community and the future project residents is estimated at 3.5 hours, once notification has been provided. If the northerly emergency evacuation routes to Del Diablo Street and Andorra Way are not used, this would increase the evacuation time to 5.2 hours. This is in comparison to the estimated current evacuation time for The Glens community (without the additional evacuation routes provided by The Junipers) of 8.3 hours (Dudek 2019a)."</p> <p>Please explain how the addition of 536 additional residences to the neighborhood, with primary egress onto Penasquitos Dr and Carmel Mountain Rd could decrease the evacuation time from 8.3 to 5.2 hours? This estimation, described in Appendix K4 assumes unrealistic assumptions of traffic from the Glens neighborhood through the Junipers development onto Carmel Mountain Rd via the Private Driveway V. The choke point is still at exits leading onto Camel Mountain Rd, exiting to the east or the west.</p>	
SI30-14	<p>Reference 6.0 Cumulative Impacts :</p> <p>The Cumulative Impacts does not take into account the Millenium PQ project, replacing the Hotel Karlan, for which demolition is currently in progress. I understand this adds an additional 331 condominiums to the neighborhood, with entry/exit at the intersection of Penasquitos Dr and Cuca St, which puts additional vehicular volume onto Penasquitos Dr and the Carmel Mountain Rd intersection as well as the likelihood of significant traffic onto Cuca St.</p> <p>Will the EIR be updated to include the cumulative impact of the Millenium PQ project and seriously consider the additional traffic and resultant hazards on Cuca St and intersections (Via Lombardia, Janal Way Gerana St, Old Saybrook and Bernarbe Rd) and the communities along Cuca St (Cresta Bella apartments and Canyon Rim apartments) and to Los Penasquitos Elementary school to the west?</p>	<p>SI30-14 The project Transportation Impact Analysis addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1).</p> <p>SI30-15 Refer to the Response to Comment 20 from Haight A (Letter SI3A) for detailed information regarding traffic signal and roundabout operations, including during emergency situations where evacuations are necessary.</p>
SI30-15	<p>Reference pg 6-17 :</p> <p>"The Conceptual Wildland Fire Evacuation Plan for the existing Glens community and proposed Junipers project also highlights the transportation improvements associated with the project."</p> <p>The proposed transportation improvements of a roundabout at the intersection of Penasquitos Dr and Janal Way and a traffic light at the intersection of Penasquitos Dr and Cuca St, are proposed for "traffic calming" on Penasquitos Dr (i.e. Slowing down the traffic) and to allow for improved egress from the Junipers and current Hotel Karlan onto Penasquitos Dr. I don't understand how these transportation improvements contribute to improvements in the Glens evacuation from the North. Please explain?</p>	<p>SI30-16 The only required exception under the law that would permit a child under the age of 18 to live in an age-restricted community is to permit a disabled child or grandchild who is dependent on the resident to live there. This is a rare exception that would not result in a significant impact to schools. The low likelihood of public school students and the surety that the project would pay developer impact fees that could be used to address school pressures if they should occur, results in the ultimate finding that the project's impacts would be less than significant. Regarding enforcement, please also refer to the Response to Comment 2, above.</p>
SI30-16	<p>Reference 7.1.4 Schools, pg 7-4 :</p> <p>"The project would provide age-restricted (55+) housing, which means that, with very rare exceptions, no school age children would be permitted to reside within the development and no impacts to schools would occur."</p> <p>Please explain how it will be enforced that school age children will not be permitted to reside within the Junipers development (with very rare exceptions)?</p>	
SI30-17	<p>Reference 7.2.3, pg 7-5 :</p>	

## COMMENTS

## RESPONSES

<p>SI30-17 cont. "The proposed development of 455 moderately-priced"</p> <p>Please explain what specifically is meant by "moderately-priced". All other verbage in this report uses the term "market-price".</p> <p>SI30-18</p> <p>Reference Appendix K4 Wildland Fire Evacuation Plan.</p> <p>The plan models the egress through the Junipers and Private Driveway V onto Carmel Mountain Rd and egress through the intersection of Penasquitos Dr and Carmel Mountain Rd as uncorrelated (evidenced in tables 3 and 4). This is a false assumption in the model. Egress rate of all roads in close proximity connecting to Carmel Mountain Rd are highly correlated. The choke point is the peak capacity of Carmel Mountain Rd for traffic to the east or west. Please provide justification for the uncorrelated assumptions in this model?</p>	<p>SI30-17 This comment does not address adequacy of the EIR. For informational purposes, however, the term "market rate" is intended to differentiate between these homes and the affordable homes that the project would also construct. The project contains moderately sized homes on condominium lots, and is immediately adjacent to a major industrial/transportation corridor. While anticipated to be a desirable neighborhood, the homes within it would not be priced to sell at top of market, but would be accessibly, or moderately, priced.</p> <p>SI30-18 Carmel Mountain Road between Peñasquitos Drive and I-15 is the largest street with the most lanes in the immediate area, and it is acknowledged that evacuation routes are likely to use this roadway. During evacuation, however, emergency responders can direct use of traffic lanes in any direction (e.g., as appropriate, normally west-bound lanes could be converted for eastbound use. As such, benefit is gained from providing a shorter route out of the neighborhood, and alleviating pressure on the intersection of Peñasquitos Drive and Carmel Mountain Road. Please note that the project also proposes improvements to the currently inaccessible egress route to Andorra Way and northerly to Camino Del Norte, which would bypass Carmel Mountain Road altogether, as described in further detail in the Response to Comment 1 from Derbique (Letter SI4).</p>
---	---

## COMMENTS

## RESPONSES

From: [Katy McClelland](#)  
 To: [DSD FAS](#)  
 Subject: [EXTERNAL] Draft EIR Comment - Project Name: The Junipers / Project No. 586670  
 Date: Sunday, April 05, 2020 1:47:45 PM  
 Attachments: [Distance-from-black-mountain-open-space.png](#)

Dear Ms. Osborn,  
 Below are my two comments for the Draft EIR:

SI31-1

Section 5.8.1.1 Environmental Setting  
 Wildlife Corridors

The EIR states "Black Mountain Open Space Park is the nearest undeveloped block of habitat and is located approximately 0.2 mile to the west." Where was this distance measurement taken? By my calculation the distance between the nearest undeveloped block of habitat is closer to 240 feet or .05 miles. (see attached).

SI31-2

Section 5.8.1.1 Environmental Setting  
 Wildlife Corridors

The EIR states "Common birds and mammals might move through the site to forage and during dispersal activities; however, they would not be expected to use the site as a wildlife corridor, linkage, or specific travel route to and from important resources.

This is inaccurate. One house and one road does not stop coyotes and bobcat from moving to and from the project site to Black Mountain Open Space Park. Multiple times we have witnessed coyotes (with dens of cubs on the project site) as well as bobcat crossing Penasquitos Drive going from the project site to Black Mountain Open space. While it may not be expected, the site is in fact being used as a wildlife corridor, linkage, or specific travel route to and from important resources.

How was this study conducted to determine that "mammals would not be expected use the site as a wildlife corridor, linkage, or specific travel route to and from important resources?" Would it be possible to place infrared cameras to capture wildlife over an extended period of time moving to and from the project site?

SI31-3

Section 5.8.1.1 Environmental Setting  
 Animal Species

The EIR states "A total of 36 animal species were observed or otherwise detected in the project site during the biological surveys, including 3 invertebrate, 1 reptile, 28 bird, and 4 mammal species."

While your observations only detected "1 reptile," as a neighbor to the project site, I have in fact observed the following reptiles on the site: gopher snakes, California king snakes, western fence lizards, southern alligator lizards, a box turtle as well as amphibians (frogs). If your observations

SI31-1 The measurement referenced by the commenter was intended as an approximate average distance from the western boundary of the project site to the City of San Diego Multi-Habitat Planning Area (MHPA) associated with the Black Mountain Open Space (BMOS) to the west. The commenter is correct that the boundary of the BMOS is slightly closer to the project than the MHPA, however, because not all of the BMOS is located within the City's MHPA. This is reflected on the attached Figure A and clarified in the Final EIR. The precise distance between the project and the City's MHPA varies from 690 to 1,100 feet, and the distance from the project to the boundary of the BMOS varies from 180 to 1,080 feet. As shown in Figure A, one western corner of the site is within 180 feet from the BMOS, with one row of intervening homes as well as Peñasquitos Drive, but most of the project site is much further away.

SI31-2 **Topical Response – Wildlife Corridors.** The MHPA represents the City's MSCP planned preserve system and includes open space that is already conserved, in addition to undeveloped land that is not yet conserved but targeted for conservation. The MHPA is configured throughout the City to encompass the most important sensitive species habitat areas, including large native habitat blocks and smaller native habitat corridors that help species move between the habitat blocks.

## COMMENTS

## RESPONSES

SI31-2 (cont.) When native habitat blocks and corridors are not directly connected with one another, they can be linked together by smaller isolated native habitat fragments in a linkage arrangement. The BMOS represents a large habitat block in the region, but its connectivity to other habitat blocks via corridors and linkages occur to the west, away from the project site. Section 1.2.4 and Page 25 of the City's Multiple Species Conservation Program (MSCP) Subarea Plan description provides an excellent depiction of this fact on Figure 5, *Conserved Vegetation Communities in Northern Area* (<https://www.sandiego.gov/sites/default/files/legacy//planning/programs/mscp/pdf/description.pdf>). As shown on Figure 3 of the Biological Resources Letter Report (Appendix F to the EIR) and Figure A that is attached to these responses to comments, the MHPA is not mapped within the project site or any areas that immediately abut the project site. There are also no large native habitat blocks or smaller native habitat corridors or fragments mapped within or immediately abutting the site. There is no native habitat on the project site and none has existed on the site for decades. Therefore, the project site does not by itself serve as an existing native habitat block, corridor, or linkage of native habitat fragments, nor does it directly connect to any such resources. As pointed out by the commenter, there is one area of undeveloped land west of Peñasquitos Drive, which is part of the BMOS, but outside of the City's MHPA. This portion of the BMOS, in addition to the portions farther west within the MHPA, are separated from the project site by existing developments. In fact, the project site is surrounded on all sides by existing development. As shown on EIR Figure 2-4 and the attached Figure A, the entire site is blocked from any open space by intervening existing homes and Peñasquitos Drive. Any mammals managing to pass these obstructions and find their way onto the site are essentially blocked from additional movement to the east by the presence of I-15 and the developed areas beyond; the site provides

## COMMENTS

## RESPONSES

SI31-2 (cont.) limited biological function and is isolated, with no additional habitat connections to the north, south, or east. While it is acknowledged that common wildlife adapted to urban settings may use the site, there is no native habitat on the project site that would contribute to long-term conservation goals for sensitive species or their habitat, including the establishment of a habitat block, corridor, or linkage for the MHPA or otherwise.

As quoted in the comment, the EIR specifically states that “Common birds and mammals might move through the site to forage and during dispersal activities.” Such behavior on the part of animals habituated to human proximity does not make the site a designated corridor. The commenter is correct and consistent with EIR Section 5.8 and Appendix F, in the assertion that certain common wildlife, such as coyotes, are expected to find their way onto the project site and utilize it for some of their life history requirements. This is not expected for most wildlife species, however, and certainly not expected for native wildlife species that are targeted for long-term conservation in the region, which is an important factor at the core of determining whether a potential significant impact could occur. EIR Section 5.8.3, *Impact 2: Wildlife Corridors*, specifically addresses this issue, and discloses that the project site does not occur within an identified or known wildlife corridor or linkage. As noted, the project is completely fenced and bordered on all sides by major roadways (Carmel Mountain Road to the south and Peñasquitos Drive to the west), transportation corridors (Interstate 15 to the east), and residential development (to the north and west) constraining wildlife access and movement. The presence of residential and commercial development within the surrounding area has eliminated north-to-south and east-to-west habitat connectivity from adjacent open space areas.

COMMENTS

RESPONSES

SI31-3  
cont.

missed 5x the number of species of reptiles that live on the project site, how can you be assured that only one sensitive animal species lives on the project site? Will the city expand it's observations for a longer time period to determine if other sensitive animal species live on the project site?

Thank you for your consideration of these comments,  
Katy McClelland

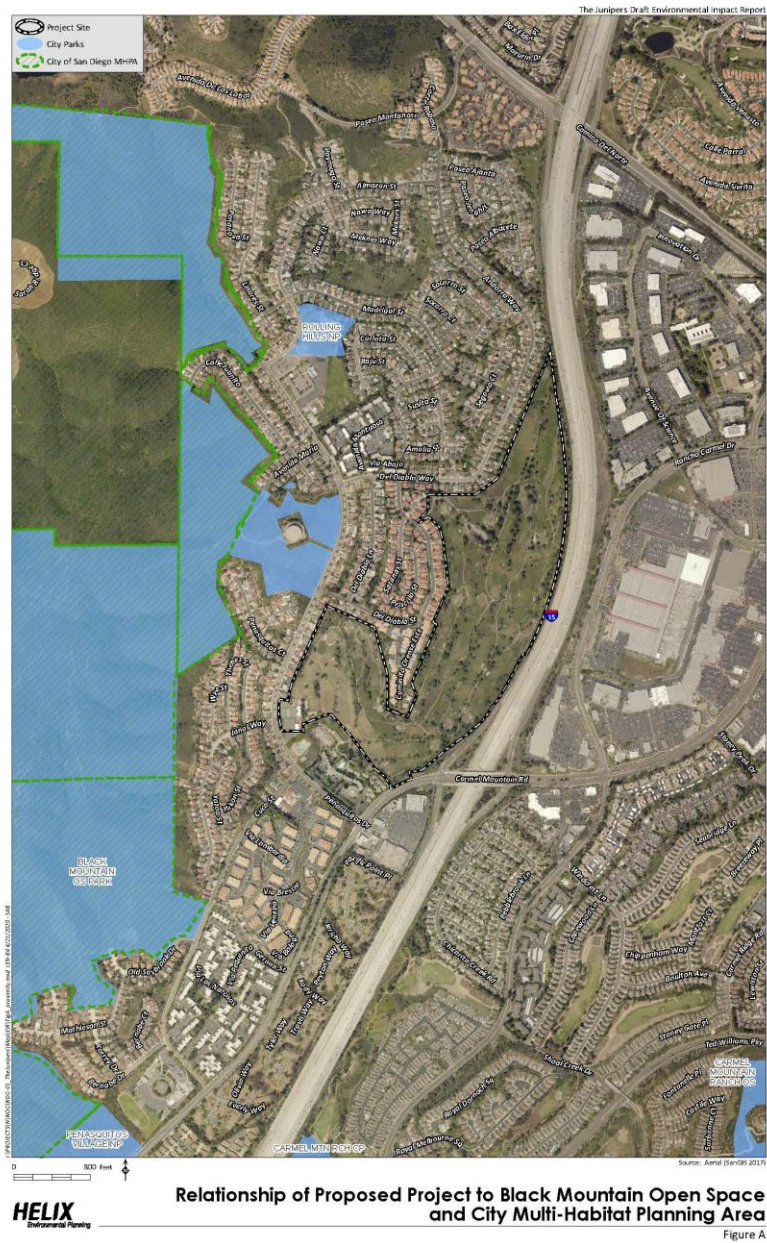
SI31-3 The EIR identifies both plant and animal species observed during surveys and species anticipated to have the potential to occur on the site. It is not possible or expected that all of the potential species that could occur at any given time would be observed during the required biological surveys. Special status plant and animal species with potential to occur within the project were analyzed and addressed within the EIR Section 5.8.1.1. A detailed analysis of the species' potential to occur within the project site is included in Attachment G, *Special Status Plant Species with Potential to Occur*, and Attachment H, *Special Status Animal Species with Potential to Occur*, within EIR Appendix F, *Biological Resources Letter Report*. Attachments E and F of Appendix F also provide lists of plant and animal species observed during biological surveys. As stated on Page 5 of Appendix F, under "Survey Limitations," the lists of species identified are not necessarily comprehensive accounts of all species that utilize the project site, as species that are nocturnal, secretive, occasional, or seasonally restricted may not have been observed. General biological and rare plant surveys were completed to obtain a comprehensive inventory of plant species that occupy the project site. Directed studies to inventory a complete account of all animal species that may occupy or utilize the site are not required, as all of the species that were determined to have some potential to occur are considered adequately conserved in the region and the long-term survival of their populations are not being threatened or jeopardized by the project.



COMMENTS



RESPONSES



## COMMENTS

## RESPONSES

**From:** [Barbara Malebranche](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH NO. 2018041032  
**Date:** Monday, April 06, 2020 5:14:02 PM

Attn: Ms. Sara Osborn

Dear Ms. Osborn:

I have several questions regarding this project that raise concerns shared by the majority of residents of Penasquitos Glens. My primary concern is the lack of adequate egress from this area in the event of fire, earthquake or other disasters. After my review of the EIR, please consider the following questions:

- SI32-1 1. What evidence is there to support the assumption that slight improvements in too tiny passageways (not roads) will allow for adequate and expeditious egress from the back end of PQ for the roughly 1500 residents in this section? I live two houses down from the Andorra cul de sac and have for the last 30 years. There is no way that funneling traffic from Andorra Way and multiple side-streets feeding into it into a very narrow passageway, barely allowing a single car to leave into Paseo Montanoso (which will also be backed up exiting to Camino Norte) will allow escape for no more than the first 2-3 cars. Evacuating will take many hours.
- Are the houses along this narrow passageway going to be purchased and demolished to widen the road to allow more egress?
- SI32-2 2. What evidence supports the assumption that the small service road accessing the old golf course will allow more than one vehicle to exit in an expeditious fashion, without sitting for many hours? Again, exiting to the tiny area allowed to access I-15 will result in a back-up hours long. Have any timed drills been done?
- SI32-3 3. What is the evacuation plan for Rolling Hills School children when Rancho Penasquitos Drive is completely impacted with bidirectional traffic in an emergency. Per history of the last evacuation due to fire immediately adjacent to our area, PQ drive was impacted within an hour thus requiring evacuees to sit for hours in harm's way. Getting a school bus in to evacuate the children simply will not happen. What fire/evacuation drills have been done? Are you aware of the evidence that shows fire trucks cannot navigate roundabouts? How will the fire engines get over the round-about to do time-sensitive rescues and fight fires? What evidence or drills have been done to validate the safety of round-about plans? Expert opinion here is not adequate.
- SI32-4 4. What evidence supports the assumption that only 2/3 of the population will be at home when a fire breaks out? Many Santa Ana related fires start during the night when people are home, sleeping, thus the population would be at capacity. In the 30 years I've lived here there have been very few unoccupied homes.
- SI32-5 4. What evidence supports the safety of further overdevelop meant at the corner of Carmel Mt.

SI32-1 The assertion that 1,500 residents would be exiting via Andorra Way is not consistent with any scenario analyzed in the Wildland Fire Evacuation Plan in EIR Appendix K4. As described in that plan, it is expected that up to 5,232 vehicles would be required to evacuate, assuming a worst case of two cars per home. Andorra Way is not currently a functional evacuation point, but, as discussed in the Response to Comment 1 from Derbique (Letter SI4), the project would implement improvements to the pavement, vegetation maintenance, and access restrictions (functional gate, etc.) to allow for functional evacuation. This would then represent one of three potential evacuation routes for residents of the Glens and the project, including the new route through the project to Carmel Mountain Road.

Improvement of the emergency route connection would not require purchase and demolition of homes in order to widen the road. Adequate width for 20-feet of pavement can be provided within existing right-of-way.

SI32-2 Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.

## COMMENTS

## RESPONSES

	<p>SI32-2 (cont.) As noted therein, the extensive calculations of evacuation times both with and without the project demonstrates that the project would result in an improvement in evacuation times, due to the addition of two functioning evacuation routes that are not currently available to residents of the Glens community.</p> <p>SI32-3 Rolling Hills Elementary School is specifically included in the modeling for Glens evacuation, with bus and car evacuation assumed; however, school fire/evacuation drills are not included in the Wildland Fire Evacuation Plan. Those efforts are part of routine City of San Diego school plans. The modeling addresses movement following students leaving the classroom and entering an evacuation vehicle. Moving buses into the area, as required, would be part of the coordinated response noted above if buses are not already on site. Note that emergency response personnel have the ability to direct traffic as needed during evacuations. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>Relative to roundabouts, and their ability to accommodate both community vehicles and emergency response vehicles such as fire trucks, refer to the Response to Comment 20 from Haight A (Letter SI3A). Project-related drills are not required to demonstrate roundabout safety plans and the design incorporates the apron and restricted planting features that make the roundabout functional for emergency vehicles.</p> <p>Expert opinion refers to technical specialists qualified to work in the area under review. As such, the design and modeling evidence is considered technically adequate.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI32-4 This comment is not understood, as the Evacuation Plan analysis does not discount the number of residents who would be home. The analysis conservatively assumes that all 2,575 homes in the community would be occupied and that for each residence, 2 vehicles would be evacuating, along with buses and other vehicles from Rolling Hills Elementary and Peñasquitos Lutheran Church. The reality is that some residents may be out of town, at work/school, or have only one vehicle to evacuate. If the evacuation event were to take place during the night, as suggested in the comment, then the school would not be included.</p> <p>SI32-5 The project proposes a total of 536 residences. Please refer to analyses in EIR Section 5.13.2, which concludes less than significant impacts to police and fire services, as well as Section 5.14.4, which addresses the improvements to evacuation routes and timeframes that would occur with project implementation.</p> <p>Fire modeling was conducted regarding the type and intensity of fire that could be expected given specific characteristic site features such as topography, vegetation, and weather. Please refer to EIR Appendix K5, the Fire Protection Plan, Section 4, <i>Anticipated Fire Behavior Modeling</i>, for detail. Please also refer to the Response to Comment 1 regarding regional emergency response improvements.</p> <p>As analyzed in Section 5.2, <i>Transportation/Circulation</i>, the only areas where the project would result in significant impacts would be at two intersections with Peñasquitos Drive (Janal Way and Cuca Street, respectively). Project mitigation would improve function at these intersections to level of service A, the least congested condition. No significant impacts were assessed to roadway segments.</p>
--	---



## COMMENTS

## RESPONSES

SI32-5  
cont.

drive and PQ drive, increasing that single square mile with 1500 new residences? The EIR presents ideas that are flawed and dangerous. One should hope that lessons learned from the Paradise CA fire where there were inadequate egress, just as is being created in our area, that cost the lives of almost 90 people who were burned alive.

5. What traffic/police/911 expansion plans are being created to match the overpopulation of our area? The current police force is inadequate for our current population, increasing it by 1500 new residences requires additional infrastructure.

SI32-6

I support safe development of our area, and adding 1500 new residences in on e square mile with the currently described remedies is not safe. As a 30 year residence of this area it is my hope that residents' experience be considered in these plans. Unfortunately it has been our experience the residents' input has not been considered. Please explain.

Thank you very much,

Barbara Malebranche  
15589 Paseo Jenghiz  
San Diego CA 92129

858-672-9313

SI32-5 (cont.) Specific police expansion plans are beyond the purview of this project. Project impacts are assessed as less than significant in EIR Section 5.13, *Public Services and Facilities*. As stated in Section 5.13.2.2:

*Ongoing funding for police services is provided by the City's General Fund. Police protection is ordinarily extended to newly developed areas and funded as a function of the increased tax base. For the incremental increase of approximately 911 residents in this largely gated community, it is not expected that new facilities or improvements to existing facilities would be required. The project would add to the tax base and General Fund, thereby contributing to the funding of additional police positions consistent with City planning. Therefore, project impacts to police protection services would be less than significant.*

SI32-6 Community input is gained through comments received during public review of the Draft EIR (to which this letter is a response), comments received from the Rancho de los Peñasquitos Planning Board, and finally, comments submitted at public hearings on the project before the City Planning Commission and City Council. As this comment does not directly address the adequacy or accuracy of the analyses in the Draft EIR, no further response is required.

## COMMENTS

## RESPONSES

**From:** [Brian Meredith](#)  
**To:** [DSD EAS](#)  
**Subject:** [EXTERNAL] The Junipers Project No. 586670/SCH No. 2018041032  
**Date:** Monday, April 06, 2020 11:30:03 AM

Hi Sara,

Here are my concerns for the EIR for The Junipers. Please ensure that this questions are included in the the final review for this project.

- SI33-1 1. In reference to Fire and Life Protection in section 5.13.2.3 Significance of Impacts, on page 209, what is the ratio of available fire department vehicles to number of dwellings for the existing Glens community, and how will that ratio change with the addition of the Juniper's proposed residences?
- SI33-2 2. In reference to Fire and Life Protection in section 5.13.2.3 Significance of Impacts, on page 209, what is the existing rate of car ingress onto Penasquitos Dr, and how will this rate change with the addition of the Juniper's proposed residences during a fire emergency?
- SI33-3 3. In reference to Fire and Life Protection in section 5.13.2.3 Significance of Impacts, on page 209, what is the existing rate of car egress onto Penasquitos Dr, and how will this rate change with the addition of the Juniper's proposed residences during a fire emergency?

Thank you,

Brian Meredith

SI33-1 During fire events, the number of vehicles dispatched to the location depend on the size of area burning, weather conditions, and surrounding area needs. As necessary, response vehicles can be dispatched from a number of districts that do not normally cover this area for day-to-day conditions. Please see Section 3 of the project Wildland Fire Evacuation Plan for information about agency coordination. As explained in Sections 5.13 and 5.14, response times to the project site would be adequate. In addition, emergency response and evacuation times would be expected to improve due to the addition of a variety of emergency access improvements that would benefit the proposed project and the Glens community, including the provision of emergency routes that are not currently accessible. Refer to the Response to Comment 1 from Derbique (Letter SI4) for additional detail. Section 5.13.2.2 of the EIR states:

*The SDFRD has facilities and staffing in the project area to adequately serve the project. Although the project would result in increases in fire calls for service, the increases would be incremental and no new facilities or improvements to existing facilities would be required as a result of the project. The project would add to the City tax base and contribute to the General Fund that is used to hire and sustain SDFRD staffing levels. Therefore, project impacts to community fire protection services would be less than significant.*



## COMMENTS

## RESPONSES

SI33-2 Both Comments 2 and 3 imply vehicles coming “onto” Peñasquitos Drive, whether for ingress or egress purposes; these comments are therefore interpreted to refer to the same types of movements. It is not clear which intersections with Peñasquitos Drive the commenter is concerned with, or whether the commenter intends to refer to vehicles entering and exiting Peñasquitos Drive. Regardless, as described in detail in Section 5.14.4.2:

*In the proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, the evacuation travel timeframe for the Glen’s community and the future project residents is estimated at 3.5 hours, once notification has been provided. If the northerly emergency evacuation routes to Del Diablo Street and Andorra Way are not used, this would increase the evacuation time to 5.2 hours. This is in comparison to the estimated current evacuation time for The Glens community (without the additional evacuation routes provided by The Junipers) of 8.3 hours (Dudek 2019a). Therefore, the project would reduce evacuation travel time within the project area.*

The above analysis implies a faster rate of cars entering from Peñasquitos Drive and exiting onto Peñasquitos Drive with implementation of the project improvements, compared to an evacuation under existing conditions. It is important to note that for both the existing and future condition, however, the rate of cars entering Peñasquitos Drive would vary depending on the approach to the fire response and evacuation. Vehicles accessing the area would be controlled by emergency response personnel. Cars could be kept out of neighborhoods in peril altogether, and lane capacity could change as fire managers closed routes or opened two-way lanes to only flow in one direction, among other strategies considered best in their professional technical judgement.

## COMMENTS

## RESPONSES

SI33-2 (cont.) The anticipated movement of vehicles onto Peñasquitos Drive during specified potential evacuation conditions was calculated as part of the project Wildland Fire Evacuation Plan (Appendix K5 to the EIR). Tables 2, 3 and 4 address the numbers of cars totaled for the existing Glens community in evacuation calculations, as well as the time required to evacuate. The project traffic was added to these vehicular counts and the time of evacuation was evaluated in conjunction with those additional vehicles as well diversion of some traffic to other evacuation routes. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.

SI33-3 Please refer to the Response to Comment 2.

## COMMENTS

## RESPONSES

**From:** [Keith Nyberg](#)  
**To:** [DSD EAS](#)  
**Cc:** [Junaid Razvi](#)  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 1:51:26 PM

Hello,

I have some serious concerns about the proposed Junipers Project No. 586670.

Most importantly under **5.13.2.3 Significance of Impacts - Fire and Life Protection**

How can it be determined that the Project impacts to community fire/lifeprotection services would be less than significant?

SI34-1

We have had neighbors recently have their insurance policies canceled because of the extreme fire risk posed by the vegetation on Black Mountain. Specifically, they called out the danger of the single exit road during a fire. Since living in my home, I have had to evacuate 4 times due to the threat of wildfire. During one evacuation, I had a firefighter specifically call out the threat of fire from the massive amount of unburned fuel on Black Mountain. In the EIR, it is stated that we don't have to worry because when there is a fire, the wind "will" be coming from the East or Northeast, so we don't have to worry. That is wrong. The fire that burned from the Mt Carmel HS burned West and crested the ridges above our homes. Over development of the area puts the entire community at risk. I recommend building far fewer homes than are currently suggested. Especially since the development of the Hotel Karlan property was never considered in this plan.

Furthermore, **5.2.2 Impact 1: Potential for Traffic Congestion**

SI34-2

With the increased development in multiple locations in the area you have determined that there would be significant traffic impacts. Was the Hotel Karlan redevelopment plan even taken into consideration? The proposed plan would add 355 apartments and retail locations funneling in and out of 3 driveways onto Penasquitos drive. Morning commutes are bad and adding 1000's of more cars will make it work. And more dangerous. You only have one road to exit this development for upwards of 1000 cars. The intersection at Janal is going to be overwhelmed.

SI34-3

## 7.1 Effects Found Not To Be Significant

- Schools: I find this conclusion to be inaccurate. The 2 elementary schools in

SI34-1 Comments noted. The availability of insurance is not a CEQA issue. CEQA focuses on environmental effects, and generally does not address financial concerns. Please refer to the Response to Comment 3 from Cicchelli (Letter SI9) regarding fire direction and to Section 4.2 of the Evacuation Plan for assumptions regarding homes, numbers of evacuating vehicles and roadways taken. The issue of a single-exit lane is addressed below.

Alternatives addressed in Section 8.0, *Project Alternatives*, include a Reduced Intensity Development Alternative, which proposes a 25 percent reduction in residential units. Please note, however, that because safety and hazards discussions did not find significant impacts based on project population (and in fact found the project would reduce evacuation times and be beneficial as regards that issue), no alternative was developed to lessen significant impacts for that issue. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding implementation of the evacuation plan and the proposed emergency evacuation and access improvements that would benefit the community.

SI34-2 The transportation analysis (see EIR Section 5.2.2, as cited in the comment), expressly included Pacific Village, as well as the Merge 56 and The Preserve at Torrey Highlands as cumulative projects. These projects were identified at the time of the project Notice of Preparation in April 2018, when the environmental baseline for the project was set.

## COMMENTS

## RESPONSES

SI34-2 (cont.) Regarding Millennium PQ, please refer to the Response to Comment 5 from DeLano (Letter SI1).

Please note that the worst movement at Peñasquitos Drive/Cuca Street operates at Level of Service (LOS) E under current conditions in the AM peak hour, before traffic from the project is included.

As shown in EIR Tables 5.2-12 and 5.2-13, under both Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions, with the signal proposed by the project for mitigation at the Peñasquitos Drive/Cuca Street, operations would be at LOS A, the LOS with the least traffic congestion.

Specific to the Peñasquitos Drive/Janal Way/Future Project Access, the project is calculated to have 43 trips in/64 trips out in the AM peak hour, and 90 trips in/60 trips out in the PM peak hour. Although all of the exiting trips would use Janal Way, a substantial portion of the inbound trips to the project would be expected to enter through the right-in only access off of Carmel Mountain Road, taking those trips off public roadways prior to reaching Peñasquitos Drive. Regardless, the project was identified as resulting in a significant impact at the Peñasquitos Drive/Janal Way intersection, and mitigation was proposed and incorporated into project design.

The effect of the project-proposed mitigation at both the Janal Way and Cuca Street intersections is addressed in Tables 5.2-12 and 5.2-13, respectively, for Opening Day (2020) Plus Project and Horizon Year (2050) Plus Project conditions. Both intersections would operate at LOS A, the least congested condition, under both scenarios.

SI34-3  
cont.

the neighborhood are already at capacity. And even though this is to be a 55+ development, there is no guarantee that there will not be residents with school age children. In fact it is more likely than not that there will be people under 55 living in the community. How can this possibility not be considered significant to our local schools?

### S.5.3 Reduced Intensity Development Alternative

With the increased density comes an increased risk to public safety, increased traffic and congestion. Excessive burden on our infrastructure and overpopulation of our impacted elementary schools. I understand the the property will be developed, but it needs to be built in a way that is safe and sustains the livability of the community that has lived here for decades.

I will support the REDUCED INTENSITY DEVELOPMENT ALTERNATIVE. This needs to be the path forward. Especially because of the proposed OVERDEVELOPMENT of the Hotel Karlan property. There may be a housing "crisis" in California and San Diego, but the community of Rancho Penasquitos (specifically The Glens) should not have to sacrifice safety and lose quality of life. The REDUCED INTENSITY DEVELOPMENT ALTERNATIVE is the only fair choice. Homes are added, safety is preserved and quality of life is sustained.

SI34-4

I know developers would like to portray themselves as noble servants of the community. Stepping in to solve the housing crisis in California. But when it comes down to it they are ultimately companies who want to make as much profit as possible. Without community input they would over build every parcel to maximize profits. If the community had its say, we would have a golf course, a hotel and a fitness center. Now we are losing a priceless piece of open space. We only get one chance to get this right. I will affect the community for decades to come. Please, please, please move forward with the REDUCED INTENSITY DEVELOPMENT ALTERNATIVE.

As a resident of Rancho Penasquitos, and specifically The Glens, I appreciate the opportunity provide input into the development. And in all fairness Lennar Homes have made a sincere effort into community outreach. I hope that what they are hearing from us is that we want to sustain the quality of life we have in our neighborhood. Aside from no development, the REDUCED INTENSITY DEVELOPMENT ALTERNATIVE is the only choice that will lead to a safer, less congested and livable community.

Sincerely,

Keith Nyberg  
10959 Guadalimar Way  
San Diego, CA 92129  
858-699-5306

SI34-3 Please refer to the Response to Comment 13 from Commons (Letter SI5) for information regarding the definitions and enforcement of the 55+ age-qualified housing for the project, and the impact on schools.

SI34-4 Comments noted. The commenter's preference for the Reduced Intensity Development Alternative for the proposed project is acknowledged. Please refer to Response to Comment 6 from Derbique (Letter SI4) regarding "quality of life." Refer to the Response to Comment 7 from DeLano (Letter SI1) for detailed information regarding the loss of golf course/open space.

Comments noted regarding appreciation of ability to provide input into the development. Please refer to the Response to Comment 2, above, regarding less than significant project contributions to congestion.

## COMMENTS

## RESPONSES

---

**From:** [geoff@san.r.com](mailto:geoff@san.r.com)  
**To:** [DSD\\_FAS](#)  
**Subject:** Project No. 586670 / SCH No. 2018041032 Junipers - Draft EIR Comments  
**Date:** Monday, April 06, 2020 8:10:33 PM  
**Attachments:** Project 586670 Junipers EIR Comments.pdf

---

Please find attached comments/questions regarding the draft EIR for Project No. 586670 / SCH No. 2018041032 Junipers. Please reply acknowledging receipt.

Regards,  
Geoffrey Patrick



## COMMENTS

## RESPONSES

Geoffrey Patrick  
15245 Andorra Way  
San Diego, Ca 92129  
[geoff@san.rr.com](mailto:geoff@san.rr.com)

Sara Osborn  
City of San Diego Development Services Center  
1222 First Avenue, MS501  
San Diego, CA 92101  
[DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

Project Name: The Junipers  
Project No. 586670 / SCH No. 2018041032

Please accept the following draft EIR comments and questions for project consideration;

- SI35-1
- 1) Where slopes adjacent to existing residents are on the proposed development property, can the proposed developer ensure current and future stability of the slopes through remediation, reclamation and maintained landscaping as condition of approval?
    - a) This provision is required to ensure the long-term stability of historically unstable slopes and safety of homes and residents of affected adjacent properties by requiring the proposed developer to ensure that slopes are stable and meet current standards.
    - b) At the October 2, 2019 Rancho Penasquitos Planning Board meeting, the board was informed by residents of Del Diablo Street that as many as 20 residences on Del Diablo Street were experiencing issues as the result of the developer-owned slope instability and slippage. A reported study performed by the developer found as much as 13mm of movement over a six-month period according to residents who attended and spoke at the meeting.
- SI35-2
- 2) Where the property of the proposed development is adjacent to existing residential properties, can a period of time be established where owners of existing residential properties are allowed access to the area of property adjacent the property of the proposed development via the proposed development property prior to start of construction as a condition of approval?
    - a) Precedence for this requirement lay in the Declaration of Conditions and Restrictions of Lots 121 to 225 inclusive in Penasquitos Unit No. 4, Section II, Paragraph 16 established on May 16, 1969;
 

“Slope Maintenance – That each grantee of a lot in sold tract agrees for himself, his heirs, assigns, or successors in interest that he will permit free access by owners of adjacent or adjoining lots to slopes or drainageways located on his property which affect said adjacent or adjoining lots, when such access is essential for the maintenance of permanent stabilization on said slopes, or maintenance of the drainage facilities for the protection and use of property other than the lot on which the slope or drainageway is located.” Attachment “A”
    - b) Lack of access via the proposed development property has contributed to deferred maintenance by some homeowners resulting in the conditions seen today from the proposed development property.
    - c) This condition of approval would encourage improvements and remediation of slopes on existing residence properties.

SI35-1 This topic is addressed in Section 5.10, *Geology and Soils*, of the EIR. As stated in Section 5.10.2.2:

*Extensive analysis was also conducted regarding the potential for the project to destabilize adjacent properties during project grading and the results indicate that with implementation of the recommendations within the Geotechnical Investigation, slope stability will be within acceptable safety parameters. Measures such as slot buttressing would be employed to ensure the stability of existing manufactured slopes along the northern and western site boundaries and to protect the adjacent properties during project grading. Based on the Geotechnical Investigation, Geocon concludes that the proposed development will not destabilize or result in settlement of adjacent properties or City right-of-way, provided the recommendations presented in the referenced report are followed during design and construction (Geocon 2019a and 2019b).*

The geotechnical consultant has performed a comprehensive investigation of the proposed project and project site. Their geotechnical report and analysis have been reviewed and accepted by the City of San Diego geotechnical reviewers and found to be in conformance with regulatory requirements. With respect to site grading and slope stability, the project has been designed to meet or exceed the applicable code requirements. The project buildings have been pulled back from the western

## COMMENTS

## RESPONSES

	<p>SI35-1 (cont.) slopes that abut existing development. The slopes that were created for the previous Glens development will not be cut into or graded. The portion of the slopes that is within the project boundaries will be landscaped and maintained by the project's HOA. Where steeper slopes exist, jute netting will be installed with project landscaping to prevent erosion as plants are establishing.</p> <p>SI35-2 The only proposed public access easements associated with the project are those that will grant access for use of the neighborhood park, social loop, mobility zone/bike hub and sport courts. Should any adjacent neighbor need access to the portions of the slopes behind their homes that are within the project site, for the purpose of maintaining their own property, they may request access from the project's HOA. Please note that, although not a CEQA issue, the project applicant has provided members of the community with methods for contact, including through the project website, has received several requests for access to the project site for the purpose of maintenance related to an adjacent property, and has granted access to the project site on a case-by-case basis.</p>
--	--

## COMMENTS

## RESPONSES

SI35-2  
cont.

- d) Improvements and remediation to adjacent property is beneficial to both the existing residents and future residents of any proposed development.
- e) Such access had been previously permitted by the operators of the prior golf course by request. Since the closure of the golf course, there has been no clear method or point-of-contact for such requests.

SI35-3

- 3) Where slopes adjacent to the proposed development are on existing resident property, can assistance be provided to existing property owners in remediation, improvements and/or landscaping by the proposed developer as a condition of approval?
  - a) Precedence for assistance with maintenance of landscaping on slopes of adjacent resident property can be found in File No. 305665 of Official Records recorded December 21, 1971 establishing an easement for irrigation pipeline, planting and irrigating and incidental purposes.
    - i) This easement permitted the golf course to plant and irrigate slopes of adjacent resident properties. Some of these permitted pipelines can still be found on the properties.
  - b) This condition would encourage remediation, improvements and/or landscaping by existing adjacent resident properties.
  - c) Developer-provided assistance could help streamline a potentially chaotic process by reducing the steps needed to be taken by individual property owners in requesting access on behalf of an array of potential contractors.
  - d) Developer-provided assistance could be beneficial to the developer in the form of confidence in those contractors chosen to perform work by having some hand in deciding what contractors perform the work.
  - e) Assistance could be provided based on the condition that adjacent existing resident property owners agree to use material and contractors approved by the proposed developer.
  - f) Assistance could be defined as material or financial.
    - i) Material assistance could be a mutually agreed upon contractor to perform all services covered by the developer-provided assistance using a predetermined palette of materials at a volume discount to owners of existing adjacent resident property who choose to participate in the assistance.
    - ii) Financial assistance could be defined as a one-time defined contribution towards the cost of remediation, improvements and/or landscaping by existing adjacent resident properties.

SI35-4

- 4) Where slopes adjacent to the proposed development are on existing resident property, can access to the slopes from the proposed development property for the purpose of maintenance and landscaping in perpetuity as a condition of approval?
  - a) Precedence for this requirement lay in the Declaration of Conditions and Restrictions of Lots 121 to 225 inclusive in Penasquitos Unit No. 4, Section II, Paragraph 16 established on May 16, 1969;
 

“Slope Maintenance – That each grantee of a lot in sold tract agrees for himself, his heirs, assigns, or successors in interest that he will permit free access by owners of adjacent or adjoining lots to slopes or drainageways located on his property which affect said adjacent or adjoining lots, when such access is essential for the maintenance of permanent stabilization on said slopes, or maintenance of the drainage facilities for the protection and use of property other than the lot on which the slope or drainageway is located.” Attachment “A”

SI35-3 Prior agreements between the golf course operators and adjacent homeowners are no longer valid, and assistance would not be provided to off-site homeowners in their remediation, improvement, or landscaping efforts. The project would, however, use measures such as slot buttressing to ensure the stability of existing manufactured slopes along the northern and western site boundaries and to protect adjacent properties during project grading as described in EIR Section 5.10.2.2. The project would incorporate required site-specific recommendations from the Geotechnical Investigation, implement associated design/construction recommendations, and conform to applicable mandatory regulatory/industry standard and codes, including the IBC/CBC and pertinent City criteria. The project would be responsible for accommodating existing drainage flows across the site as well as new drainage created by the project. The project would be responsible for on-site landscaping and the project's HOA would maintain those portions of the slopes that are within the project site; adjacent homeowners would be responsible for maintaining their properties as well. Although not a CEQA topic, the applicant may enter into legal easement agreements with adjacent property owners. Please see the Response to Comments 1 and 2 for additional related discussion.

SI35-4 Please refer to the Responses to Comments 1 through 3. On site slopes would be maintained by the project's HOA; off-site slopes would be the responsibility of the owner of such slopes. No slope maintenance easements are currently proposed.

## COMMENTS

## RESPONSES

SI35-4 cont.	b) This provision is required to ensure the long-term stability of historically unstable slopes by allowing residents to maintain irrigation and slope-stabilizing landscape.	
SI35-5	<p>5) Can the proposed traffic signal at the intersection of Penasquitos Drive and Cuca Street/driveway of the former Karlan property be replaced with a roundabout as being proposed at the intersection of Penasquitos Drive and Janal Way?</p> <p>a) According to the Federal Highway Administration, when compared to other intersection types;</p> <ul style="list-style-type: none"> <li>• Reduction in fatalities is more than 90%</li> <li>• Reduction in injuries is 76%</li> <li>• Reduction in all crashes is 35%</li> <li>• Reduction in speed through the intersection</li> <li>• Safer for pedestrians</li> </ul> <p>b) There is already a roundabout being proposed for the intersection of Penasquitos Drive and Janal Way less than 600ft away, a second roundabout would provide greater constancy to Penasquitos Drive which currently has NO traffic controls north of Carmel Mountain Road.</p> <p>c) A traffic signal would be completely out of character with the existing community. A traffic signal in the middle of a neighborhood of this size is unprecedented in Rancho Penasquitos and perhaps the City of San Diego.</p> <p>d) A roundabout is well fit to handle the Average Daily Trips for this intersection.</p> <p>e) A roundabout would be more aesthetically pleasing and a better fit for this community.</p> <p>f) At the September 4, 2019 Land Use Committee meeting of the Rancho Penasquitos Planning Board where the developer presented, the representative was asked if the traffic light control proposed for the intersection of Cuca Street and Penasquitos Drive could/will be reconsidered. The response was that the traffic light control could/will be reconsidered.</p> <p>g) A roundabout in lieu of a traffic signal at this intersection has wide community support.</p> <p>h) A roundabout could be considered a benefit to the community where a traffic light is likely to be considered an impediment.</p>	SI35-5 Comments noted. Refer to the Response to Comment 20 from Haight A (Letter SI3A) for detailed information regarding traffic signal and roundabout operations.
SI35-6	<p>6) Can the current traffic study be reviewed and applicable portions re-done due to the fact that portions of the current traffic study were based on factually incorrect assumptions?</p> <p>a) The current traffic study was performed based on now factually incorrect assumptions.</p> <p>b) The current traffic study is an integral part of the draft EIR and has possibly impacted significant conclusions.</p> <p>c) The traffic study uses traffic volumes of a hotel instead of traffic volumes of a 331 residential unit.</p> <p>d) The traffic volumes used in the traffic study is 331 residential units short.</p> <p>e) The first paragraph of section 8.3.2 of this draft EIR states that higher residential densities than the 536 age-restricted residential units were considered for this project but traffic analysis indicated that the potential for significant traffic circulation impacts would not be feasible to mitigate.</p>	SI35-6 The proposed Millennium PQ project was not known at the time of issuance of the project Notice of Preparation of an EIR in April 2018, when the project environmental baseline was set. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.
SI35-7	7) Should impacts to transportation/circulation, visual effects/neighborhood character, hydrology/water quality (due to increased impervious surfaces and runoff), geology and historical resources (due to increased grading/excavation), air quality, GHG, energy, and public services and	SI35-7 Regarding the Millennium PQ development, please refer to Response to Comment 5 from DeLano (Letter SI1).

## COMMENTS

## RESPONSES

SI35-7  
cont.

- utilities be re-evaluated and applicable studies re-done due to the fact that the 331 additional residential units are being planned ministerially on what was formerly the same property?
- a) The impacts as the result of building more than 536 age-restricted units proposed are identified in the first paragraph of section 8.3.2 of this EIR.
  - b) 331 residential units planned on the site of the former Hotel Karlan were announced publicly in late December 2019, nearly two months before the release of the draft EIR.
  - c) The 331 residential units planned will also create impacts to the same resources as this proposed development of 536 age-restricted units.
  - d) 536 age-restricted units in addition to the 331 residential units planned is 867 units planned for this recently single property. That is 36 residential more than the 831 residential units that were deemed too great an impact to each of these resources to consider.
  - e) Ample time was available to conduct study and analysis for this EIR based on 331 residential units and not a hotel that is now closed.
    - i) San Diego Open DSD shows applications and fees submitted to the city for building permits as early as August 19, 2019 for the 331 planned residential units.
    - ii) The hotel tennis courts facing closure is mentioned multiple times in the EIR, yet despite all of the research done for this detailed report, the well-known fact that the hotel would also be closing and 331 residential units would be built following the ministerial review process is completely ignored by this EIR.

SI35-8

- 8) Explain how this project is a benefit to existing residents of this community as compared to the existing land use designation, density and general plan policy?
- a) Any objective analysis of this development proposal would conclude that this plan provides no net benefit to the residents of this community.

SI35-9

- b) As a result of this proposed development, existing residents of the Glens community will face;
  - i) Significantly increased traffic
  - ii) A traffic signal
  - iii) A threat to their safety in the case of precedented mass evacuation orders
  - iv) Loss of a unifying open space element as defined in the Rancho Penasquitos Community Plan

Regards,



Geoffrey Patrick

SI35-8 The proposed project would bring a number of benefits to the existing community. Please refer to the Response to Comment 1 from Haight (Letter SI3A).

SI35-9 Significant project traffic impacts from the proposed project would be fully mitigated with the proposed traffic signal and roundabout at the Janal Way and Cuca Street intersections with Peñasquitos Drive. The resulting level of service at these intersections would be improved compared to existing conditions. Signal implementation would not result in adverse impacts, but rather would be beneficial (please refer to the Response to Comment 5 above). The project would reduce potential evacuation time compared to the existing condition, resulting in a net project benefit and provide a variety of accessible park/open space benefits, as explained in the Response to Comment 1 from Haight (Letter SI3A). Since the prior golf course has been closed since 2015, there would be no loss of a "unifying open space element."

**Attachment "A"**

CC# 837 & 99      WHEN RECORDED MAIL TO:      IN 115  
 Panaguiton, Inc.  
 3810 Cowley Way      92117      NOT RECORDED AND THIS RECORD      1977

**DECLARATION OF CONDITIONS AND RESTRICTIONS**

This Declaration of Conditions and Restrictions, made this 18th day of May, 1967 by  
 Panaguiton, Inc., an Illinois corporation,

WHEREAS, said Panaguiton, Inc., herein referred to as "Owner," is the owner of all  
 that real property situated in the City of San Diego, County of San Diego, State of California,  
 more particularly described as follows:

Lots 121 to 225 inclusive in Panaguiton Unit No. 4 in the City of San Diego,  
 County of San Diego, State of California, according to Map thereof No. 8184,  
 filed in the Office of the County Recorder of San Diego, September 3, 1966.

WHEREAS, Owner before selling and conveying any of said lots desires to subject all  
 lots in Panaguiton Unit No. 4 to certain conditions and restrictions for the protection and benefit  
 of the prospective owners thereof;

NOW, THEREFORE, this Declaration of Conditions and Restrictions, WITNESSETH:

**I. General Plan for Protection and Benefit of all Lots.** That the Owner hereby certifies  
 and declares that it has established and hereby does establish the following general plan for the  
 protection and benefit of all said real property and has filed and does hereby file the following  
 restrictive conditions and restrictions upon and subject to which each and all of the lots hereinafter  
 described shall be held, leased or sold, and/or conveyed by it to the Owner; and that such condi-  
 tions and restrictions shall inure to and pass with each and every lot, and shall apply to and bind the  
 respective successors in interest of the present Owner thereof;

**II. SAID CONDITIONS AND RESTRICTIONS ARE AS FOLLOWS, TO-WIT:**

(1) **Residential purposes only.** That said lots shall be used for residential purposes only and  
 that no building or buildings shall be erected, constructed, altered or maintained on any of the said  
 lots other than single residential units, together with customary out-buildings, as permitted by City  
 Zoning Ordinances.

That after the recording of this Declaration, no petition to rezone any of the said lots will  
 be circulated or signed by any of the lot owners, and no application for rezoning will be signed or  
 filed with governmental authorities by the owner of any of said lots without first obtaining in  
 writing the consent and approval of either Irvin J. Kuhn and/or Norman R. Smith or their successors.

(2) **New Buildings Only.** That no building of any kind shall be moved from any other place  
 onto any of said lots, or from one lot onto another lot, without the prior written permission of  
 Architectural Jury, as described in Paragraph (3).

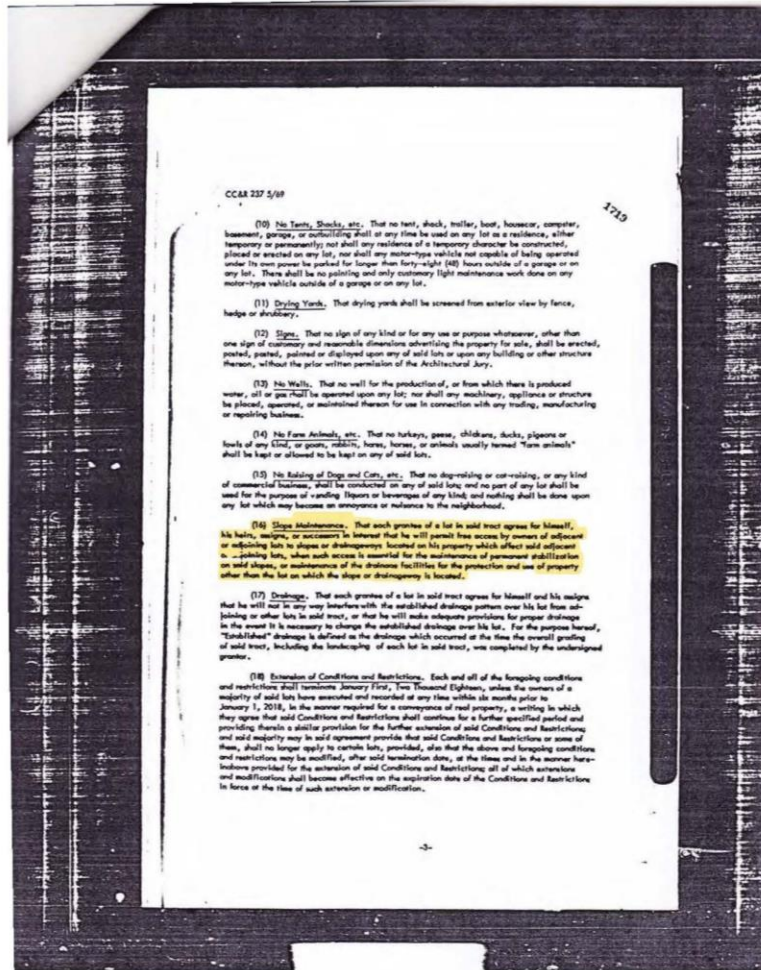
(3) **Minimum Floor Area of Dwellings, Television Pre-Wiring.** That the floor square-foot  
 area, exclusive of porches, patios, and porches, of any one-story building for dwelling purposes,  
 shall not be less than 1,200 square feet on the ground floor, unless the written approval of the  
 Architectural Jury is obtained.

**Television, Pre-Wiring.** No building shall be erected without proper provision to accom-  
 modate such cable television service as may be available. Minimum acceptable pre-wiring for each  
 such building shall contain two television outlets and shut-out with conduit and cable to the existing  
 television pedestal at the front of each lot.

-2-

THIS INSTRUMENT IS FOR REAL ESTATE PURPOSES TO BE RECORDED WITH THE COUNTY RECORDER OF SAN DIEGO





## COMMENTS

## RESPONSES

**From:** Judy Piercey <jpiercey@sbcglobal.net>  
**Sent:** Saturday, April 4, 2020 8:58 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] The Junipers Project No. 586670 / SCH No. 2018041032 - Comments for The Junipers Environmental Impact Report Draft

Dear Sara Osborn:

Below are my comments for The Junipers Project No. 586670 / SCH No. 2018041032 Environmental Impact Report Draft, <https://www.sandiego.gov/dega/draft>.

- SI36-1
- **Page 108 Section 5.2-25 Significance of Traffic Impact**
    - The Junipers on the former Doubletree Golf Course is expected to be over 536 residences, which will mean at least 1,000 new residents with only one way in and out – Penasquitos Drive – that was never intended to handle that type of density. **How is a traffic signal at intersection #6, Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway, expected to safely handle this huge influx of residents?**
- SI36-2
- It is noted in the EIR that “A roundabout is the preferred option for Intersection #7 – Peñasquitos Drive/Janal Way/Future Project Access – as it is feasible to implement within the boundaries of the project and the existing public road right-of-way.” **How does the City of San Diego expect a fire truck to navigate the roundabout in a fire emergency when residents are trying to evacuate at the same time using that same roundabout?**
- SI36-3
- **Page 209 Section 5.13.2.3 Fire and Life Protection**
    - The Junipers project would result in increases in police calls for service, but no new facilities or improvements to existing facilities

SI36-1 The intersection of Peñasquitos Drive/Cuca Street is currently controlled only by a stop sign, and as shown on EIR Table 5.2-1, the worst movement at that intersection currently operates at a Level of Service (LOS) E during the critical AM peak travel period. Please refer to the Response to Comment 20 from Haight (Letter SI3A) regarding road segment and intersection function.

SI36-2 The roundabout would be constructed in compliance with all City design requirements, including design to accommodate fire trucks. Please refer to the Response to Comment 20 from Haight (Letter SI3A).

SI36-3 The EIR addresses the project’s contributions to police funding, and concludes in Section 5.13.2.3:

*Any changes to police staffing or facilities would be dependent on division and Citywide needs as determined by the SDPD, and funded through the General Fund, to which project residents’ taxes would contribute. The project would result in increases in police calls for service, but no new facilities or improvements to existing facilities would be required as a result of the project. A portion of future residents’ property and sales taxes would go toward police funding. Project impacts to police protection services would be less than significant.*

## COMMENTS

## RESPONSES

SI36-3 cont.	would be required as a result of the project. <b>How can the City of San Diego be sure that this impact to response time for police would not result in additional crime or even tragic loss of lives?</b>	
SI36-4	<p>○ It is noted in the EIR that the project would result in increases in calls for fire service, but no new facilities or improvements to existing facilities would be required as a result of the project.” <b>With fires becoming more and more of a danger in northeast Penasquitos, please explain how the City can permit this new development to build 536+ residences without planning a new facility to protect the lives of those living in the neighborhood?</b></p>	SI36-4 As stated in EIR Section 5.13.1.2, the City goal is for fire stations is to be located between 2.0 and 2.5 miles apart. Two of the fire stations serving the project area are located within 0.6 mile and 2.3 miles, respectively. As stated in Section 5.13.2.2:
SI36-5	<p>• <b>Page 234 Section 6.2.2 Transportation Circulation</b></p> <p>○ It is noted in the EIR that “delay increases at Intersections #6 and #7 would exceed acceptable delay thresholds and mitigation measures would be required.” <b>What mitigation measures would the City of San Diego require here?</b></p>	<p><i>The project would be constructed per the recommendations/ requirements of the project-specific FPP related to site access, structural material, and fire protection systems. The project would also be constructed per applicable California Building and Fire codes and NFPA codes. The SDFRD has facilities and staffing in the project area to adequately serve the project. Although the project would result in increases in fire calls for service, the increases would be incremental and no new facilities or improvements to existing facilities would be required as a result of the project. The project would add to the City tax base and contribute to the General Fund that is used to hire and sustain SDFRD staffing levels. Therefore, project impacts to community fire protection services would be less than significant.</i></p>
SI36-6	<p>• <b>Page 212 Section 5.14.1.1 Environmental Setting</b></p> <p>○ Rolling Hills Elementary School at 15255 Peñasquitos Drive, and Los Peñasquitos Elementary School at 14125 Cuca Street, will both be impacted in the case of a fire. <b>How is the City of San Diego going to ensure the safety of these school children in an event of a fire, when both Penasquitos Drive as well as Cuca Street will experience heavy traffic and delays due to the increased density caused by the Junipers development taking place in the area?</b></p>	
SI36-7	<p>• <b>Page 221 Section 5.14.2 Emergency Response Plans</b></p> <p>○ The City is a participating jurisdiction in the San Diego County MHMP; Goal 3: Reduce the possibility of damage and losses to people, critical facilities/ infrastructure, and state-owned facilities, due to wildfire/structural fire, coastal storms/erosion/tsunami, landslide, hazardous materials, and other manmade hazards. <b>How can the City of San Diego reduce the possibility of loss to people and damage to property when the City is allowing high density projects like the Junipers that will impact our infrastructure and cause a bottle neck with our one way out (Penasquitos Drive) – which could very likely result in a Paradise Fire type of situation?</b></p>	
SI36-8	<p>• <b>Page 226 Section 5.14.4.2 Fire Emergency Access</b></p> <p>○ The EIR states: “The project would provide adequate emergency access within the site.” This is no longer true. 331 (Millennium PQ) + 536 (The Junipers) = 867 new residents, which is at least 1,600</p>	<p>Please also see the Response to Comment 3 above. In addition, please refer to the Response to Comment 7 below specifically with regard to emergency evacuation.</p> <p>SI36-5 Please refer to the Response to Comment 20 from Haight A (Letter SI3A) for detailed information regarding traffic signal and roundabout mitigation measure details.</p> <p>SI36-6 As shown on Table 2 of the Wildland Evacuation Plan, a population of 475 schoolchildren and staff from Rolling Hills Elementary is assumed in the evacuation model, and would be evacuated in staff vehicles and buses. These numbers, including</p>

## COMMENTS

## RESPONSES

	<p>SI36-6 (cont.) populations evacuating from the existing Glens community, Cresta Bella, and Peñasquitos Lutheran Church, were included in the evacuation projections. Los Peñasquitos Elementary School was outside of the evacuation study area. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan. As noted, the Glens community would be expected to benefit from the additional evacuation routes and reduced evacuation time from up to 8.3 hours to as little as 3.5 hours that would result with implementation of the project. The benefits are based on provision/improvement of alternative travel routes rather than reductions in vehicle numbers. It is noted that earlier analyses of the estimated population and number of evacuating vehicles (assuming two persons per vehicle) were revised upward to assume two vehicles per unit following a June 2019 Rancho Peñasquitos Planning Board presentation in response to Board request.</p> <p>SI36-7 Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>SI36-8 The project EIR addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. Please also note that the project would provide additional evacuation routes for the community and would result in a reduction in evacuation time. Thus, the project would not be expected to contribute to a significant adverse cumulative impact with respect to evacuation times.</p>
--	---

## COMMENTS

## RESPONSES

SI36-8  
cont.

additional residents to impact emergency access. **With the announcement of the Millennium PQ project being built on the Karlan Hotel property, why can't the City of San Diego revisit the fire emergency access before a tragedy happens?**

Thank you for this opportunity,  
Judy

Judy Piercey  
Address: 14898 Penasquitos Court, San Diego CA 92129  
Email: [jpiercey@sbcglobal.net](mailto:jpiercey@sbcglobal.net)  
Mobile: 858-449-1833



## COMMENTS

## RESPONSES

From: [Joe Pierzina](#)  
 To: [DSD EAS](#)  
 Subject: [EXTERNAL] The Junipers: Project No. 586670 / SCH No. 2018041032  
 Date: Monday, April 06, 2020 10:51:29 AM

Below are my questions regarding the EIR on the Juniper project:

- SI37-1 1. In order for the community plan to be amended, it must show "benefit" to the community. Lennar Homes has stated that adding homes to the larger San Diego community would be a benefit. But under the Rancho Penasquitos Community Plan, what is the definition of "community"? Turning 110 acres of designated open space into housing, even if a few acres are set aside for a park, is not a net benefit to the surrounding community. How does this project provide a net benefit to Rancho Penasquitos and the Glens neighborhood?
- SI37-2 2. For further clarity on my question #1, what benefit does this project have for the adjacent property owners? The CC&R established in 1971 provides adjacent land owners access through the golf course to their property. Will this proposed plan include adaptation of these CC&Rs and continue to grant access to adjacent land owners?
- SI37-3 3. I believe alternative uses for this property need to be considered before a decision can be made on the current proposal. What were the other uses that were given serious consideration and study?
- SI37-4 4. Will this plan provide any assistance/subsidies/offers to adjacent land owners to upgrade/beautification to their slopes directly adjacent to the subject property, including fencing?
- SI37-5 5. The fire evacuation impact needs to be independently studied. This development will not mitigate fire evacuation concerns, it will add to it. Will the City commission an independent fire evacuation study taking into account all the new and proposed development that will impact the Penasquitos Drive/Carmel Mountain Road intersection?

Thank you,

Joe Pierzina  
 15145 Andorra Way  
 San Diego, CA 92129

--  
**Joe Pierzina**  
 mobile: 619-787-9650

- SI37-1 The project would bring a number of benefits to the existing community. Please refer to the Response to Comment 1 from Haight (Letter SI3A).
- SI37-2 Again, please refer to the Response to Comment 1 from Haight (Letter SI3A) regarding project elements that would directly benefit existing adjacent property owners. The comment regarding CC&Rs does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.
- SI37-3 Alternatives are evaluated in Section 8.0, *Project Alternatives*, of the EIR. Two alternatives were evaluated and rejected, the Project Location Alternative and Existing Zoning Alternative. Full comparative analysis was completed for the No Project/Development Per Community Plan Alternative, and the Reduced Intensity Development Alternative.
- SI37-4 The project would provide on-site landscaping, as well as fencing between the project and the adjacent off-site uses, and would landscape existing and new adjacent public right-of-way that is modified as part of the project. Assistance/subsidies/offers to adjacent land owners to upgrade/beautify any off-site slopes that are on other landowners' properties is not required. The comment does not address adequacy or accuracy of analyses in the Draft EIR and does not require additional response.



## COMMENTS

## RESPONSES

SI37-5 Project evacuation has been independently studied. As cited in Section 4.2 of the Evacuation Plan, with the project improvement of emergency access/egress routes, the existing Glens community evacuation time of up to 8.3 hours would be reduced to as little as 3.5 hours, for both project residents and neighboring Glens residents. The project would not result in significant impacts and would provide benefit. Please refer to the Response to Comment 1 from Derbique (Letter SI4).

## COMMENTS

## RESPONSES

**From:** Roland Pietsch <rpietsch55@gmail.com>  
**Sent:** Monday, February 24, 2020 10:45 PM  
**To:** DSD EAS  
**Subject:** Junipers Project, Project #586670

SI38-1 Good evening,  
I am writing this email to voice my concern over the approval and construction of the Junipers project.  
As a resident of Rancho Penasquitos, I am completely against this development and it's effects on the safety of the community.  
Regards,  
Roland Pietsch

SI38-1 Comments noted. These comments do not address the adequacy or accuracy of the analyses in the Draft EIR and no response is required.

## COMMENTS

## RESPONSES

**From:** dpolitte@san.rr.com [mailto:dpolitte@san.rr.com]

**Sent:** Tuesday, March 31, 2020 2:41 PM

**To:** DSD EAS <DSDEAS@sandiego.gov>

**Subject:** Project Name: The Junipers Project No. 586670 / SCH No. 2018041032

Dear Ms. Osborn,

Please let me know that you have received this e-mail. During the period for E.I.R. comments over a year ago I submitted the attached document by e-mail to Mr. Morris Dye to be included with the E.I.R. for the above project. Mr. Dye indicated he received the document and that the attached would be responded to during the E.I.R. process. Mr. Dye and I had over five e-mails on various other topics also. Why was the attached not included in the E.I.R. for the Junipers project as promised?

Regards,

Dale Politte  
11146 Amazon Street  
San Diego, CA 92129  
858-472-5080 (cell/text)

SI39A-1

SI39A-1 Comments noted. Please note that the Notice of Preparation (NOP) identified Mark Brunette as the appropriate recipient of NOP comments on behalf of the City. If the letter went to Mr. Dye, that could be the reason it was missed. Nonetheless, the City acknowledges that the letter submitted during project scoping was received and that it was intended for inclusion in EIR Appendix A. Scoping is intended to ensure that a lead agency's CEQA documents address the appropriate environmental effects for a particular project based on agency and public input. The comments submitted then have been reviewed with respect to the content of the EIR. The discussion below confirms that the EIR addresses each of the submitted comments. In addition, the letter has been included in Appendix A.



THE CITY OF SAN DIEGO

**DEVELOPMENT SERVICES  
DEPARTMENT  
PUBLIC SCOPING MEETING  
THE JUNIPERS/PROJECT No. 586670  
WEDNESDAY, APRIL 18TH, 2018**

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the Environmental Impact Report (EIR) for the project displayed at this meeting. Please record your comments in the space provided below and submit this form to City staff at the meeting or by mail. Thank You.

**Comments:**

- SI39A-2 The most important duty of our elected City Council and elected local planning board members is to protect the safety of the people their decisions directly impact.  
The area where this developer is requesting open space to be taken from the Rancho Penasquitos community plan and then zoned to "increase the density to be higher than the surrounding area" will greatly and negatively impact the safety of the several thousand people who already live near the proposed development area.
- SI39A-3 When the area was planned/developed in the 1970's a second exit was likely planned /expected for "safety reasons" to be extended north from the north PQ Glens neighborhoods. ( Probably Penasquitos Drive north to Rancho Bernardo's High Country West community ). For whatever reason this second exit was never completed. This has caused Penasquitos Glens to be a unique neighborhood in San Diego County that has only "one way in and one way out."  
Eddie Villavicencio is the Assistant Deputy Fire Marshall for the San Diego Fire Rescue Department. At a recent Fire Safe Council board meeting (while local representatives were working on the Rancho Penasquitos emergency Plan) he stated " the area in the developers plan is classified as existing non-conforming for emergency evacuation planning. " It would seem obvious for development purposes that to significantly increase the density in an " Existing Non-conforming " neighborhood would be very unsafe and inconceivable to be approved. Mr. Villavicencio also indicated that evacuating senior citizens ( 55+ ) takes significantly longer than other age groups. The concept of " Shelter In Place " is laughable as an option in the types of massive wild fires that are possible in the proposed development area. The now existing open space may be the only " last resort " place to "shelter in" during a wild fire.
- SI39A-4 By approving the development of the current open space, the liability to the City of San Diego for future deaths or injury from wild fires will be shifted from 1970 and 1980's bad decisions to a new situation significantly worsened by adding even more residents/liabilities into the community while knowing there is only "one way in and one way out. " I hope the City of San Diego will be asking their insurance carrier to review this situation as ultimately the insurance premium would likely be greatly increased. ( unless the city is self insured ). The legal expense to settle the claims for residents who lost their lives due to the inability to escape due to poor "development decisions" would bankrupt the City or the insurer. In 2017 over 50 people perished in California wild fires. Families are now suing municipalities due to the contributory negligence caused by City Officials who allowed UNSAFE development. I know for a fact that I am not the only person on record warning the City of San Diego and the Rancho Penasquitos Planning Board about the increased emergency evacuation and liability risks which would be created by an approval of development of this open space.

Name

Please print

Signature

Address

*Dale Polite* *Dale Polite*  
11146 Alvarado Street, San Diego, CA 92128

Use back of sheet if additional space is necessary.

SI39A-2 Comments noted. Safety issues are reviewed comprehensively in the EIR. Please refer to Section 5.2.3, *Impact 2: Potential for Traffic Hazards*; Sections 5.9.4, *Impact 3: Flood Hazards*, and 5.9.5, *Impact 4: Potential for Pollutant Discharge and Water Quality*, respectively; Sections 5.9.2, *Issue 1: Potential for Geologic Instability*, and 5.9.4, *Impact 3: Potential for Geologic Hazards*, respectively; Section 5.13.2, *Impact 1: Potential for Inadequate Public Service Facilities*; and Sections 5.13.2, *Impact 1: Health Hazards*, 5.13.3, *Impact 2: Fire Risk*, and 5.13.4, *Impact 3: Emergency Response/Evacuation*, respectively.

Please note that the proposed zoning for the project is not "higher than the surrounding area" which contains both single- and multi-family residential units. Please also refer to Response to Comment 3 of Haight (Letter SI3A) regarding residential allowances under existing and proposed zoning.

Relative to past plans, CEQA requires review of potential project impacts against the existing condition. As such, the EIR reviews impacts of the proposed project against the current evacuation reality, which is consistent with the comment – there is currently one way in and out of the Glens. As detailed in EIR Sections 3.0 and 5.14, the project would improve the opportunities for neighborhood egress, and would substantially shorten modeled time for evacuation, even with additional project residences. As such, the potential effect of

## COMMENTS

## RESPONSES

	<p>SI39A-2 (cont.) the project on Glens evacuation is appropriately addressed in the EIR. Please refer to the Response to Comment 1 from Derbyque (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>SI39A-3 The evacuation timing presented in the Wildland Fire Evacuation Plan reviews the potential for congestion related to numbers of cars on the road at any one point in time.</p> <p>Sheltering in place can be a controversial topic. Following development, the site is not proposed as a community shelter area in the Evacuation Plan and would not be designated as such due to the proximity to other more flammable developments and open space.</p> <p>SI39A-4 Comments noted. The issue of “one way in and out” was addressed by the project’s evacuation proposal to provide shorter routes through the project between Peñasquitos Drive and Carmel Mountain Road and a northeastern exit at Andorra Way. Substantial discussion is provided regarding these improvements in Sections 3.0 and 5.14. The issue has been appropriately evaluated in the EIR, and is discussed further in Response to Comment 1 from Derbyque (Letter SI4).</p> <p>Insurance and legal expenses on the part of the City are not CEQA topics requiring evaluation.</p>
--	--

## COMMENTS

## RESPONSES

**From:** dpolitte@san.rr.com [mailto:dpolitte@san.rr.com]

**Sent:** Tuesday, March 31, 2020 3:01 PM

**To:** DSD EAS <DSDEAS@sandiego.gov>

**Subject:** RE: Project Name: The Junipers Project No. 586670 / SCH No. 2018041032

Dear Ms. Osborn,

Please let me know that you have received this e-mail. In the attached Dudek/Lennar report listed as used as a resource by the City of SD development services department to create the E.I.R. there are several incorrect statements. On Page two of the report it states that SD Fire Marshall, Chief Doug Perry verified and confirmed the report. Please see the attached SDFD organization chart. Doug Perry is not a SD Fire Marshall or a Chief. He is a Deputy Chief. The inflation and falsification of Doug Perry's credentials is not accurate as many other parts of this report are not. Does this make the report and the assumptions arrived at in the report also inflated and falsified? How can we believe anything Dudek presents in the attached report if they cannot even get the identity of the person that they claimed they reviewed the report with listed correctly?

Regards,

Dale Politte  
11146 Amazon Street  
San Diego, CA 92129  
858-472-5080 (cell/text)

SI39B-1

SI39B-1 The City agrees that Mr. Doug Perry is a Deputy Fire Chief, as represented in the organization chart appended to this comment. Also as shown on that organization chart, of all the technical staff listed, Deputy Chief Perry is the sole specialist listed as responsible for community education, technical services, and wildland management and enforcement, and City Department of Development Services (DSD; the department responsible for EIR preparation) liaison. As such, Deputy Chief Perry was the appropriate person to complete the project technical review for fire. The City does not find that this makes "the report and the assumptions arrived at in the report also inflated and falsified."

The remainder of the comment consists of the September 14, 2019 presentation to the community and the afore-mentioned organization chart. No additional comments are included and no response is necessary.



COMMENTS

RESPONSES



**Follow up to June 5 Presentation**

**TODAY'S OBJECTIVES:**

- Review on-site brush management
- Expanded population analysis – Areas included in evacuation study
- Clarification of new egress options
- Andorra Way Evacuation Route

**The information presented today has been verified and confirmed by SD Fire Marshall, Chief Doug Perry.**

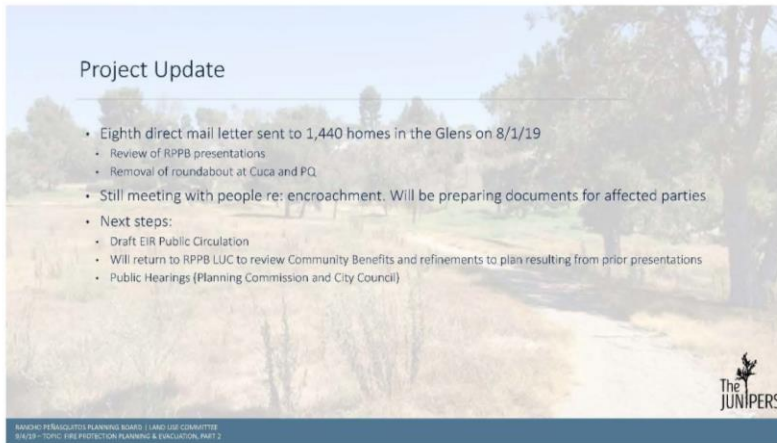
Members of The Junipers team met with Chief Perry to review the evacuation improvements and fire protection planning for The Junipers on 6/28/19.

**The JUNIPERS**

MANICHO PEBOSSUTUS PLANNING BOARD | LAND USE COMMITTEE  
6/14/19 – TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

## COMMENTS

## RESPONSES



### Project Update

- Eighth direct mail letter sent to 1,440 homes in the Glens on 8/1/19
  - Review of RPPB presentations
  - Removal of roundabout at Cuca and PQ.
- Still meeting with people re: encroachment. Will be preparing documents for affected parties
- Next steps:
  - Draft EIR Public Circulation
  - Will return to RPPB LUC to review Community Benefits and refinements to plan resulting from prior presentations
  - Public Hearings (Planning Commission and City Council)

ANNEBORO PENINSULA PLANNING BOARD / LAND USE COMMITTEE  
8/1/19 - TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

**The JUNIPERS**

Brush Management



- Neighbors have shared with us concerns over public safety as it relates to falling trees as well as pointed out “sacred” trees.
- Each year, we lose a lot of trees during the winter storms. There are a lot that are in poor health and not structurally sound.
- In the midst of the most comprehensive brush management program since the course’s closure!



RANCHO PESQUERAS PLANNING BOARD | LAND USE COMMITTEE  
PUBLIC TOPIC: FIRE PROTECTION PLANNING & EDUCATION, PART 2

### Brush Management

We are currently cleaning the property in preparation for fire season:

- **Phase 1** – Mowing (completed Aug. 16)
- **Phase 2** – Slope brush control (in process)
  - Note – we will not be removing shrubs from slopes at this time, only cleaning dead foliage.
- **Phase 3** – Clear dead trees and those found to be greatest fall risk (per July 2019 arborist report). Beginning with trees closest to homes per community comments (Q4. 2019)
  - Cross check The Junipers' arborist report with City's 'do not plant' list and evaluate removing trees with the highest environmental or fire risk (i.e. non-native, invasive, etc.)
  - Based on results of tree survey, a water program will commence to maintain the health of identified trees



The  
JUNIPERS

RANCHO PERLAQUITOS PLANNING BOARD / LAND USE COMMITTEE  
2024.12 - TOPIC: FIRE PROTECTION PLANNING & EVACUATION, MEET 2

## Expanded Population Analysis

## • Areas included in the evacuation planning

Glens (existing single-family detached, Hills Apartments, PQ Townhomes)

Junipers

Rolling Hills Elementary

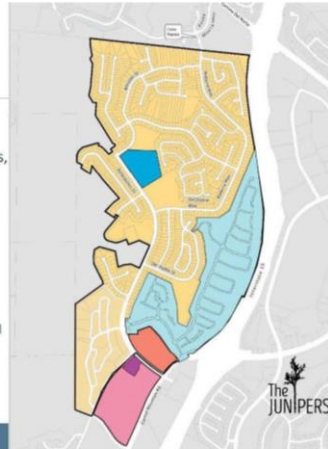
- We incorporated the School's Evac Plan Procedures

- Per School Evac Plan -- In event of evacuation, parents will not be allowed to pick up students directly from school. All students and faculty will be bussed to evac site.

Hotel Karlan (assumes 100% occupancy)

Peñasquitos Lutheran Church and preschool (assumes full church service in session)

Cresta Bella (all residents home)



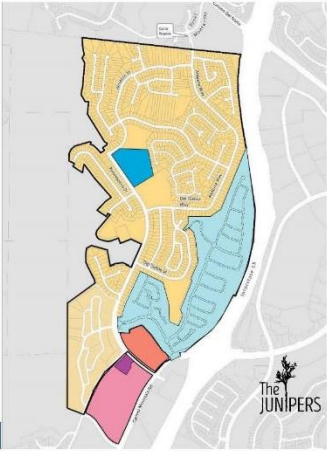


Expanded Population Analysis

- Scenario assumes 100% occupancy of all places as worst case scenario

	Olive Community	Junipers Community	Cuesta Bella Apartments	Rolling Hills Elementary	Hotel Karlin	Pescapillon Lutheran Church	Combined
Dwelling Units (residences)	1,505	536	360 units	N/A	174 rooms	N/A	2,575
Persons per Unit	3.05	1.7	3.05	N/A	2	N/A	N/A
Calculated Population	4,590	911	1,098	475	400	400	7,874
Vehicles per Unit	2	2	2	16 Buses and 20 staff vehicles	1	2 persons per vehicle	Varies
Worst Case Number of Vehicles Evacuating	3,010	1,072	720	30	200	200	5,232

SANJOSE PESCAPILLON PLANNING BOARD | LAND USE COMMITTEE  
8/6/23 - PUBLIC INFORMATION MEETING & CONSULTATION, PAGE 8



The new evacuation options provided with The Junipers make evacuation more efficient.

- Even with expanded population, there is still a reduction in evacuation time when all three egress options are available.
- Scenario utilizes “Expanded Population” and assumes 100% occupancy of all as worst case scenario
- This reduction is consistent with the figures we shared on 6/5.

**Table 4**  
**The Glens and Junipers Evacuation Travel Timeframes\***

6/5/19 Figures

Scenario	Exits	Vehicles/Exit	Minimum Road Capacity (vehicles per hour)	Estimated Evacuation Travel Timeframe***	Vehicles/Exit	Estimated Evacuation Travel Timeframe**
Existing Glens Community with Perimeter Drive (Figure 14)	1	4,160	500	8.3 hours	2,250	4.5 hours
Glens Community with Junipers and new emergency evacuation road onto CARS (Figure 15)	2	2,615	500	5.2 hours	1,375	3 hours
Glens Community with Junipers and northerly emergency evacuation route (Figure 16)	3	1,744	500	3.5 hours	910	2 hours

\* inclusive "vehicle rating" where all persons have left their home. Does not include notification, mobilization, and travel out of the area.

\*\* Scenario 1 (Existing Glens Community) includes all residential, Perimeter Townhomes plus City (Secondary), The Kaiser Hall and the Lutheran Church. Scenarios 2 and 3 include all of these plus the estimated evacuation travel timeframe is calculated by dividing the number of vehicles at 100% occupancy using each evacuation route by the route's lowest vehicle capacity.

58% reduction

55% reduction



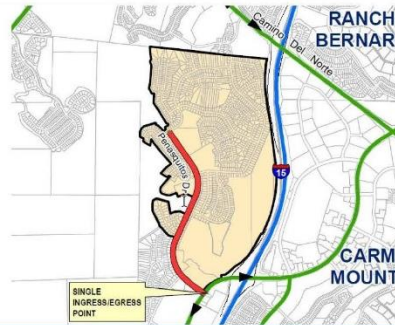
## RESPONSES

- The new routes give first responders more options when evacuating residents.
- With The Junipers, there will be NEW egress options for the Glens:
  1. Carmel Mtn. Rd.
  2. Access road at Del Diablo Street
  3. Andorra Way
- Fire agencies often require secondary access for communities with dead end road length issues
  - The Glens currently has one reliable exit (PQ Dr.)
  - The Junipers provides an alternative secondary access Via CMR
  - With The Junipers, there will be three exits (CMR, PQ Dr. and Andorra Way)



## Existing Egress: Peñasquitos Drive

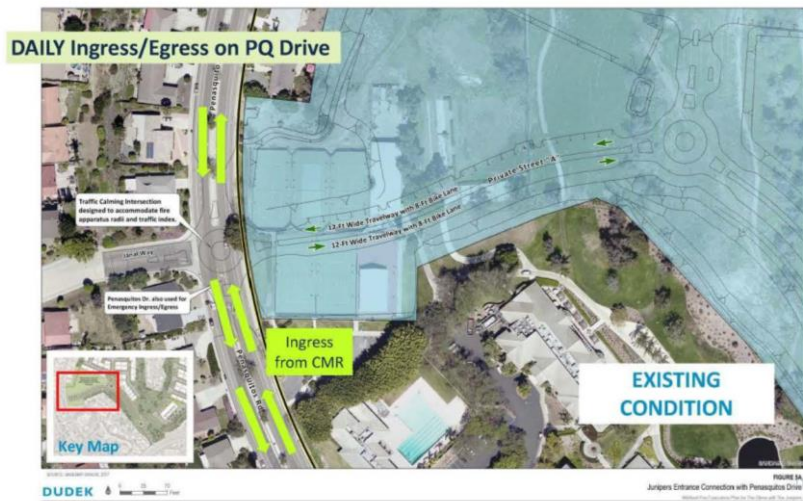
- **Currently, PQ Dr. is the only reliable ingress/egress option for the Glens**
- **On-going Daily Use:** Ingress AND Egress
- **Emergency Use:** Ingress AND Egress
  - Roundabout dimensions fit fire engine
  - Confirmed with SDFD that roundabout OK – they will condition project
- **Proposed Enhancements/Improvements:**
  - Roundabout provides traffic calming/speed control
- **Ongoing Maintenance Responsibility**
  - Junipers HOA

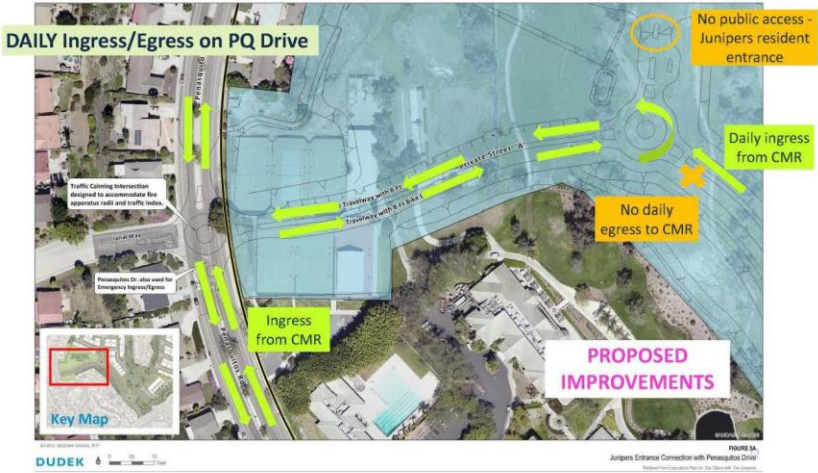


BAJALGO YOUNG & ASSOCIATES PLANNING BOARD | LAND USE COMMITTEE  
2022-2023 - 2024-2025 PROJECTS PLANNING & EVALUATION, PART 2

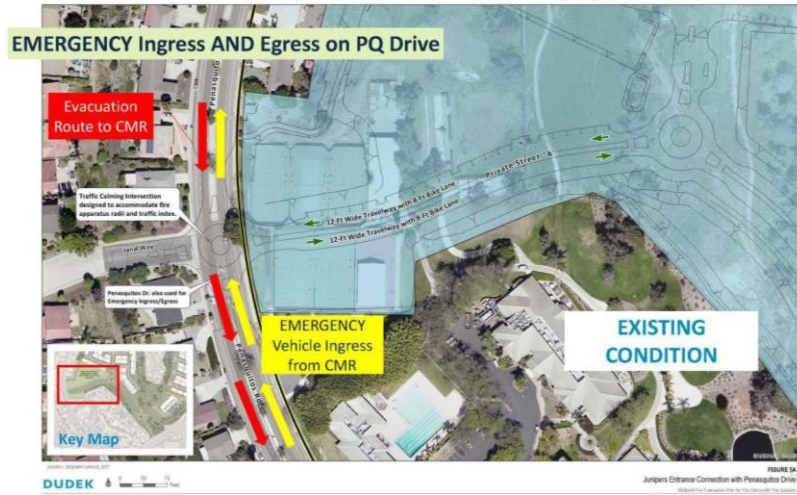
COMMENTS

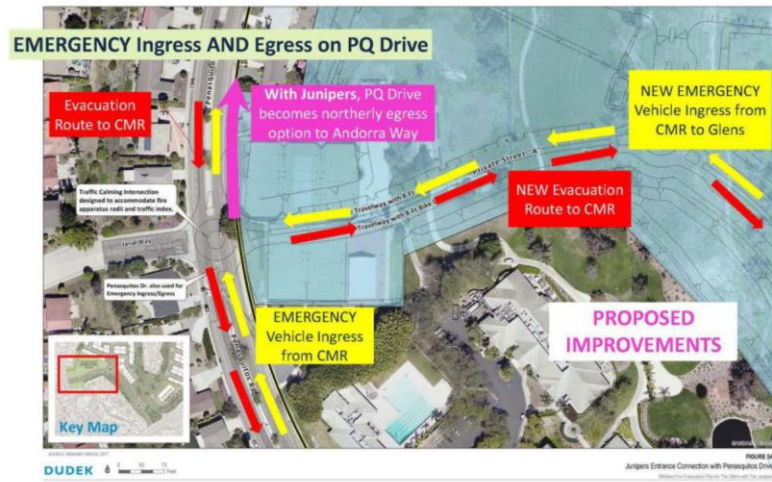
RESPONSES





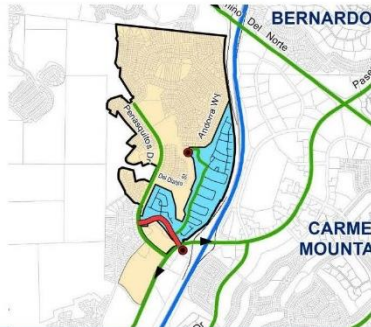






## New Egress 1: Carmel Mountain Road

- **Current Ownership** - 100% Lennar owned
- **On-going Daily Use:** Ingress only
  - If someone makes a wrong turn into The Junipers from CMR, they can continue through The Junipers to PQ Dr. at Janal
- **Emergency Use:** Ingress AND Egress
  - Controlled law enforcement personnel during evacuation
- **Proposed Enhancements/Improvements:**
  - 20 ft wide + two 5 ft bike lane to allow for two-way traffic during evacuation
  - Mountable median with flexible bollards to allow ingress/egress during evacuation
  - Automated gate to prohibit daily egress to CMR. To be opened by SDFD during evacuation
- **Ongoing Maintenance Responsibility**
  - Junipers HOA



MINOR REVISIONS PLANNING BOARD | LAND USE COMMITTEE  
6/4/19 - TOWN FIRE PROTECTION PLANNING & EVACUATION, PAGE 2

COMMENTS

RESPONSES



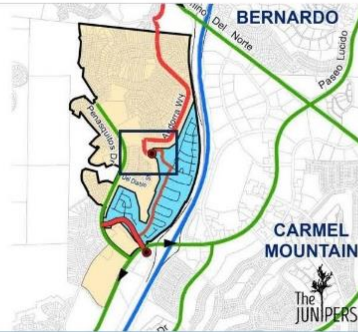
COMMENTS

RESPONSES



## New Egress 2: Del Diablo Street

- **Current Ownership:** 100% Lennar owned
- **On-going Daily Use:** Pedestrian access ONLY
- **Emergency Use:** Ingress AND Egress to through Junipers south to CMR or north to Andorra
- **Proposed Enhancements/Improvements:**
  - Dimensions – widen to 24 feet to accommodate fire engine
  - Removable bollards to ensure no daily vehicular traffic
- **Ongoing Maintenance Responsibility**
  - Junipers HOA



RANCHO PUEBLO PLANNING BOARD | LAND USE COMMITTEE  
JULY 2018 - TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2



## COMMENTS

## RESPONSES

### Access Road at Del Diablo – View Simulation 1

Existing Condition: View from Del Diablo Street,  
looking towards Junipers



Proposed Improvement:



The  
JUNIPERS

RANCHO PEÑASQUITO PLANNING BOARD / LAND USE COMMITTEE  
9/4/22 – TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

Access Road at Del Diablo – View Simulation 2

Existing Condition: View from end of maintenance road,  
looking towards Del Diablo



Proposed Improvement:

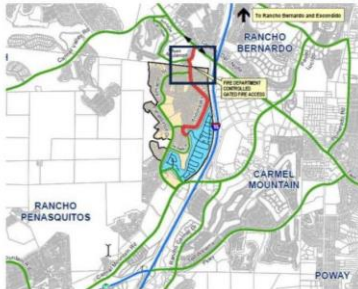


RANCHO DE LAS CORTES PLANNING BOARD - LAND-USE COMMITTEE  
6/4/23 - TOPIC FIRE PROTECTION PLANNING & EVACUATION, PART 2

## COMMENTS

## RESPONSES

### New Egress 3: Andorra Way Currently Inaccessible, Pedestrian access only



#### Existing Condition:



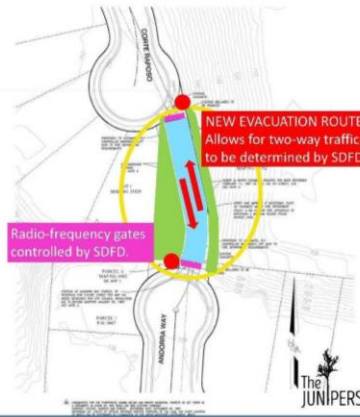
- Bollards currently concreted in place.
- No brush management
- Unsure whether road can support fire engine (50k lb.)



RANCHO PENASQUITOS PLANNING BOARD - LAND USE COMMITTEE  
5/1/21 - TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

### Andorra Way – Improvements

- **On-going Daily Use:** City of SD maintenance vehicles for existing sewer and storm drain easements, public pedestrian access
- **Existing Easements:** City of SD storm drain, sewer and emergency
- **Suggested Enhancements/Improvements:**
  - Bollards removed and replaced with new, automatic gate and single bollard for pedestrian access
  - Enhanced brush thinning and management
  - Resurfaced pavement (if necessary. Pending analysis to determine if road can accommodate load)
- **Emergency Use:** Ingress AND Egress
  - Signage will be placed at each cul-de-sac denoting emergency use only
  - SDFD to determine use based on emergency scenario
  - NOT restricted to emergency vehicles – can be used for evacuation
- **Maintenance Responsibility**
  - City of San Diego – on-going
  - Junipers HOA – quarterly brush management
  - Junipers HOA – reserve for repair and/or replacement of new gate and bollard



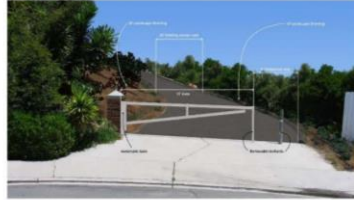
RANCHO PEÑASQUITOS PLANNING BOARD / LAND USE COMMITTEE  
9/4/18 – TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

## Andorra Way – View Simulation

Existing Condition:



Proposed Improvement:



The information presented today has been verified and confirmed by SD Fire Marshall, Chief Doug Perry.

Members of The Junipers team met with Chief Perry to review the evacuation improvements and fire protection planning for The Junipers on 6/28/19.

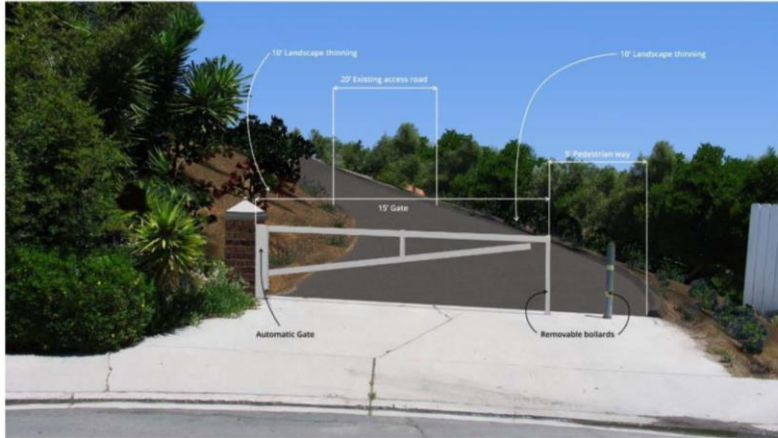


SANCHO PEÑASQUITO PLANNING BOARD | LAND USE COMMITTEE  
SANDY - TOPIC FIRE PROTECTION PLANNING & EVACUATION, PART 2

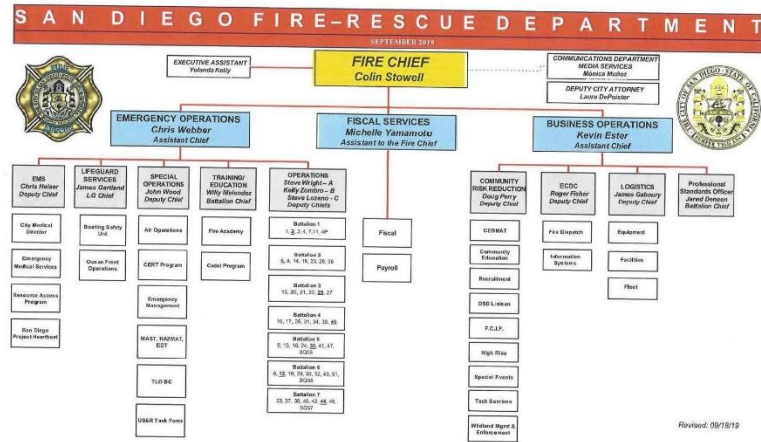
## COMMENTS

## RESPONSES

Andorra Way - Proposed Improvements







## COMMENTS

## RESPONSES

**From:** dpolitte@san.rr.com [mailto:dpolitte@san.rr.com]  
**Sent:** Tuesday, March 31, 2020 7:01 PM  
**To:** DSD EAS <DSDEAS@sanidiego.gov>  
**Subject:** [EXTERNAL] RE: Project Name: The Junipers Project No. 586670 / SCH No. 2018041032

Dear Ms. Osborn,

SI39C-1

Please consider this e-mail as an official question about the above project's E.I.R. and please let me know that you have received this e-mail. In the RPPB attachment, on page 21 of the Dudek evacuation report, Dudek indicates that the Bollards are currently concreted in place. **That is not a true statement.** Please see the attached photo taken by Mike Shoecraft ( Chair of Rancho Penasquitos Fire Safe Council ) on June 23, 2019. All of the Bollards have padlocks which I have more photos of if needed. Will the E.I.R. be corrected to show that this area **IS NOT CURRENTLY INACCESSIBLE as they claim?** I have also attached a photo of the minor Brush Mangament issue sent

SI39C-2

to Mark Kersey in August 2019. Mark Kersey's staff said that the one tree that needed trimming is not worthy of calling the exit inaccessible in their opinion. Will the calculations on page eight of the Dudek Fire Evacuation report indicating that there is currently only one possible exit be corrected to reflect this mistake?

Regards,

Dale Politte  
 11146 Amazon Street  
 San Diego, CA 92129  
 858-472-5080 (cell/text)

SI39C-1 Comments noted. The attachments to this comment consist of the September 14, 2019 presentation materials cited in the prior response. No comments were made on the slides and no response is required. The photograph provided in the attachments has been reviewed. The bollard appears from the photograph to be both padlocked and cemented in place. Regardless, the information that the bollards were impassible was provided by Fire Department personnel (see Section 4 of the Wildland Fire Evacuation Plan). As such, they would not be likely to attempt to use the route for evacuation. No changes are required to the EIR.

SI39C-2 Regarding vegetation control, comparison of the existing condition and the projected trimming that would occur for the proposed project demonstrates that it is more than a single tree. Road improvements – and the safe movement of vehicles along them during active fire events – require that trees and other vegetation do not overhang a roadway or encroach too closely upon it. Proposed trimming would be both vertical and horizontal, and would accommodate not only cars but the higher fire trucks that carry equipment. Please also note that the route is not currently considered safe for community evacuation use, and that the road requires reinforcement to appropriately carry weight associated with heavily laden trucks and multiple evacuating vehicles. There is no need to correct the Evacuation Plan. This finding is consistent with

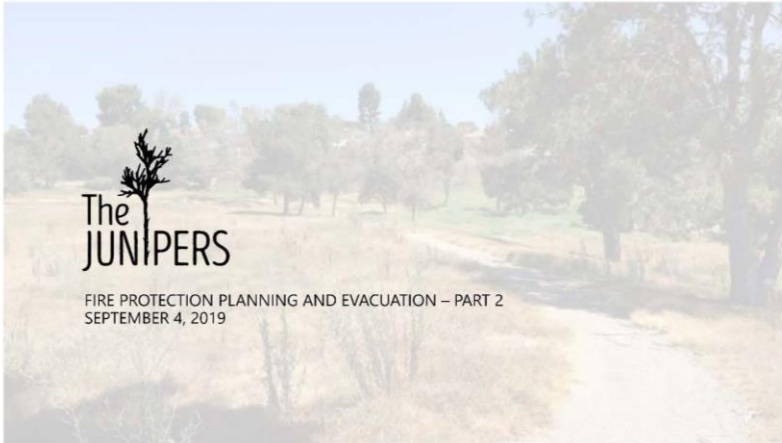
## COMMENTS

## RESPONSES

SI39C-2 (cont.) your Comment 4 submitted at 2:41 PM (comment letter SI39A) on this same day, stating that there is currently only "one way in and out."

COMMENTS

RESPONSES



### Follow up to June 5 Presentation

**TODAY'S OBJECTIVES:**

- Review on-site brush management
- Expanded population analysis – Areas included in evacuation study
- Clarification of new egress options
- Andorra Way Evacuation Route

**The information presented today has been verified and confirmed by SD Fire Marshall, Chief Doug Perry.**

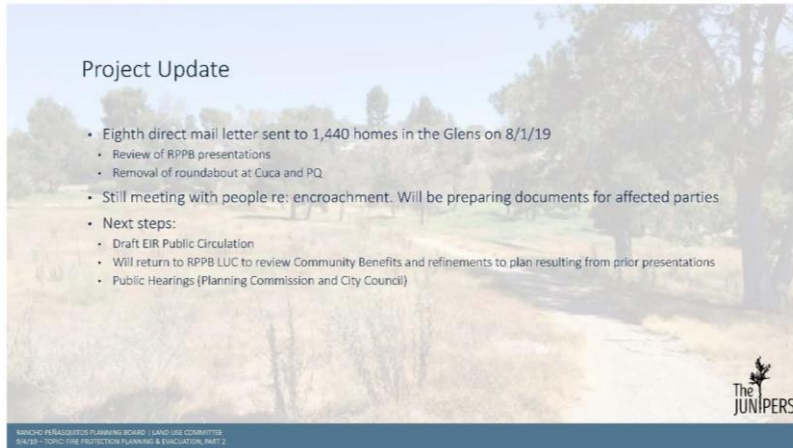
Members of The Junipers team met with Chief Perry to review the evacuation improvements and fire protection planning for The Junipers on 6/28/19.

RANCH PRESIDENT'S PLANNING BOARD / LEAD THE COMMITTEE  
OVERSEER TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

The JUNIPERS

## COMMENTS

## RESPONSES



**Project Update**

- Eighth direct mail letter sent to 1,440 homes in the Glens on 8/1/19
  - Review of RPPB presentations
  - Removal of roundabout at Cuca and PQ
- Still meeting with people re: encroachment. Will be preparing documents for affected parties
- Next steps:
  - Draft EIR Public Circulation
  - Will return to RPPB LUC to review Community Benefits and refinements to plan resulting from prior presentations
  - Public Hearings (Planning Commission and City Council)

RANCHO PERALTES PLANNING BOARD | LAND USE COMMITTEE  
8/1/19 | TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

The JUNIPERS



Brush Management



- Neighbors have shared with us concerns over public safety as it relates to falling trees as well as pointed out “sacred” trees.
- Each year, we lose a lot of trees during the winter storms. There are a lot that are in poor health and not structurally sound.
- In the midst of the most comprehensive brush management program since the course’s closure!



## Brush Management

We are currently cleaning the property in preparation for fire season:

- **Phase 1** – Mowing (completed Aug. 16)
- **Phase 2** – Slope brush control (in process)
  - Note – we will not be removing shrubs from slopes at this time, only cleaning dead foliage.
- **Phase 3** – Clear dead trees and those found to be greatest fall risk (per July 2019 arborist report). Beginning with trees closest to homes per community comments (Q4, 2019)
  - Cross check The Junipers' arborist report with City's 'do not plant' list and evaluate removing trees with the highest environmental or fire risk (i.e. non-native, invasive, etc.)
  - Based on results of tree survey, a water program will commence to maintain the health of identified trees



The  
JUNIPERS

EMILIO HERRERA/PLANNING BOARD | LAND-USE COMMITTEE  
5/4/19 – TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

### Expanded Population Analysis

- Areas included in the evacuation planning

- Glens (existing single-family detached, Hills Apartments, PQ Townhomes)

- Junipers

- Rolling Hills Elementary

- We incorporated the School's Evac Plan Procedures

- Per School Evac Plan – In event of evacuation, parents will not be allowed to pick up students directly from school. All students and faculty will be bussed to evac site.

- Hotel Karlan (assumes 100% occupancy)

- Peñasquitos Lutheran Church and preschool (assumes full church service in session)

- Cresta Bella (all residents home)

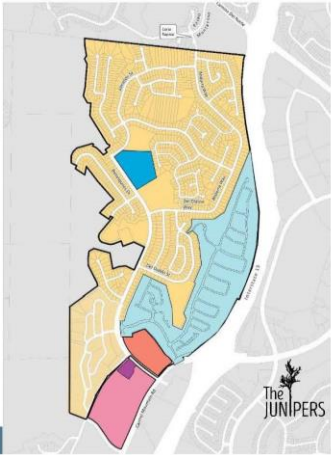


Expanded Population Analysis

- Scenario assumes 100% occupancy of all places as worst case scenario

	Glens Community <sup>1</sup>	Junipers Community	Cresta Bella Apartments	Rolling Hills Elementary	Hotel Karlan	Penasquitos Lutheran Church	Combined
Dwelling Units (residences)	1,305	536	360 units	N/A	174 rooms	N/A	2,575
Persons per Unit	3.05	1.7	3.05	N/A	2	N/A	N/A
Calculated Population	4,590	911	1,098	475	400	400	7,874
Vehicles per Unit	2	2	2	10 Buses and 20 staff vehicles	1	2 persons per vehicle	Varies
Worst Case Number of Vehicles Evacuating	3,010	1,072	720	30	200	200	5,232

RANCHO PENASQUITOS PLANNING BOARD / LAND USE COMMITTEE  
9/4/19 – IDPFC FIRE PROTECTION PLANNING & EVACUATION, PART 2



The new evacuation options provided with The Junipers make evacuation more efficient.

- Even with expanded population, there is still a reduction in evacuation time when all three egress options are available.
- Scenario utilizes "Expanded Population" and assumes 100% occupancy of all as worst case scenario
- This reduction is consistent with the figures we shared on 6/5.

**Table 4**  
**The Glens and Junipers Evacuation Travel Timeframes\***

Scenario	Exits	Vehicles/Exit	Minimum Road Capacity (vehicles per hour)	Estimated Evacuation Travel Timeframe**
Existing Glens Community with Pelicanus Drive (Figure 14)	1	4,160	500	8.3 hours
Glens Community with Junipers and new emergency evacuation road onto CML (Figure 15)	2	2,515	500	5.2 hours
Glens Community with Junipers and northerly emergency evacuation route (Figure 16)	3	1,744	500	3.5 hours

**6/5/19 Figures**

Vehicles/Exit	Estimated Evacuation Travel Timeframe**
2,295	4.5 hours
1,975	3 hours
918	2 hours


\* Includes "shelter-in-place" where all persons have left their home. Does not include notification, mobilization and travel out of the area.

\*\* Scenario 1 (Existing Glens Community) includes all residences, Pelicanus Townhomes plus CML Elementary, The Katten Villa and the Lutheran Church. Scenario 2 and 3 include all of these plus the

\*\*\* Estimated evacuation travel timeframe is calculated by dividing the number of vehicles at 100% occupancy using each evacuation route by the route's lowest vehicle capacity.

58% reduction

55% reduction



## RESPONSES

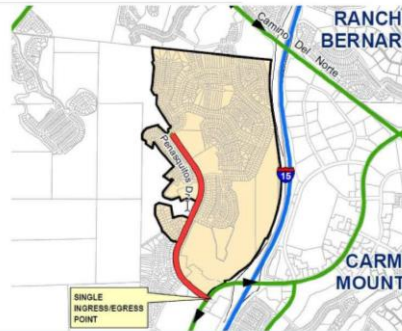
- The new routes give first responders more options when evacuating residents.
- With The Junipers, there will be NEW egress options for the Glens:
  1. Carmel Mtn. Rd.
  2. Access road at Del Diablo Street
  3. Andorra Way
- Fire agencies often require secondary access for communities with dead end road length issues
  - The Glens currently has one reliable exit (PQ Dr.)
  - The Junipers provides an alternative secondary access via CMR
  - With The Junipers, there will be three exits (CMR, PQ Dr. and Andorra Way)



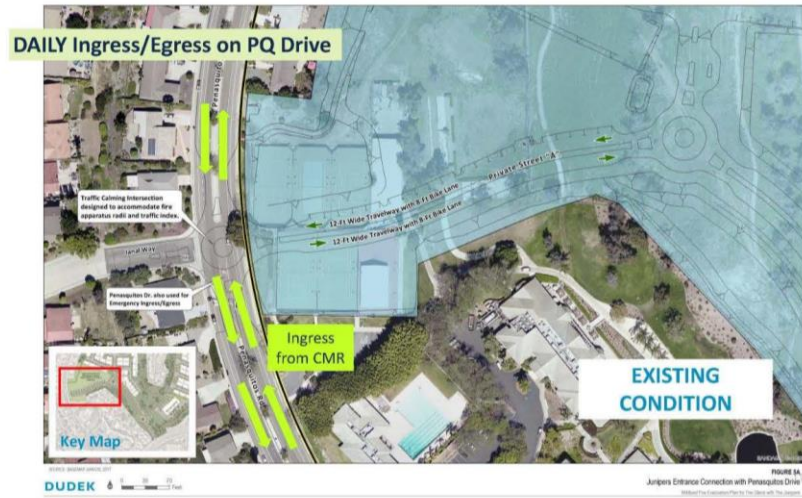


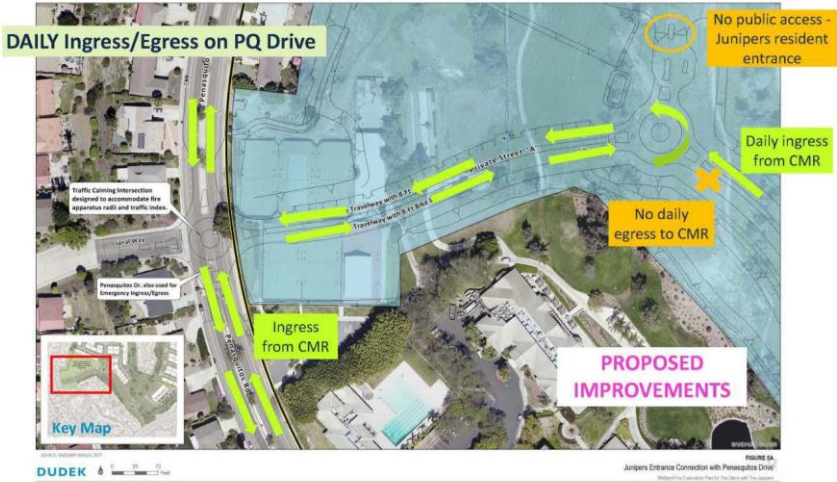
## Existing Egress: Peñasquitos Drive

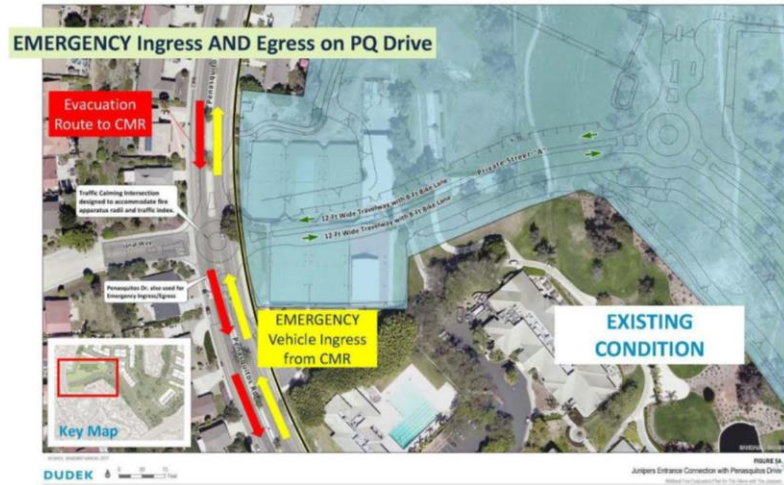
- **Currently, PQ Dr. is the only reliable ingress/egress option for the Glens**
- **On-going Daily Use:** Ingress AND Egress
- **Emergency Use:** Ingress AND Egress
  - Roundabout dimensions fit fire engine
  - Confirmed with SDFD that roundabout OK – they will condition project
- **Proposed Enhancements/Improvements:**
  - Roundabout provides traffic calming/speed control
- **Ongoing Maintenance Responsibility**
  - Junipers HOA

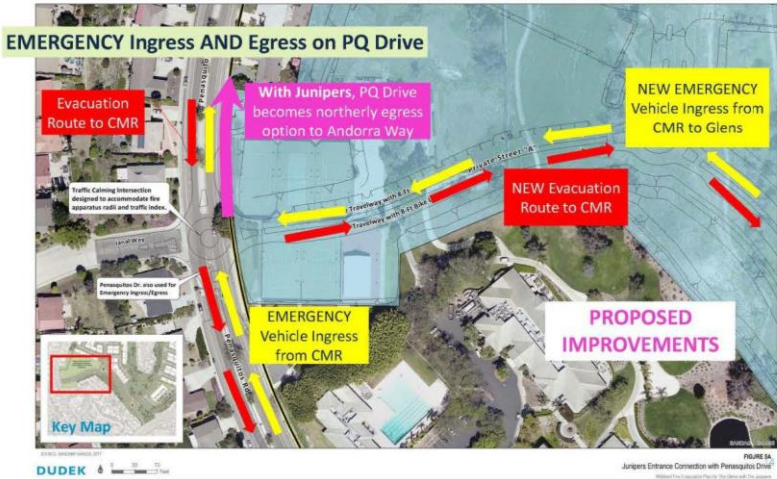


SAVON: PEÑASQUITOS PLANNING BOARD / LAND USE COMMITTEE  
9/4/19 – TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2



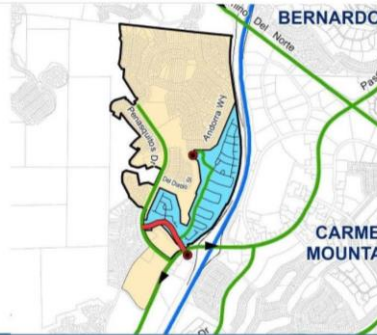






## New Egress 1: Carmel Mountain Road

- **Current Ownership** - 100% Lennar owned
- **On-going Daily Use:** Ingress only
  - If someone makes a wrong turn into The Junipers from CMR, they can continue through The Junipers to PQ Dr. at Janal
- **Emergency Use:** Ingress AND Egress
  - Controlled law enforcement personnel during evacuation
- **Proposed Enhancements/Improvements:**
  - 20 ft wide + two 5 ft bike lane to allow for two-way traffic during evacuation
  - Mountable median with flexible bollards to allow ingress/egress during evacuation
  - Automated gate to prohibit daily egress to CMR. To be opened by SDFD during evacuation
- **Ongoing Maintenance Responsibility**
  - Junipers HOA



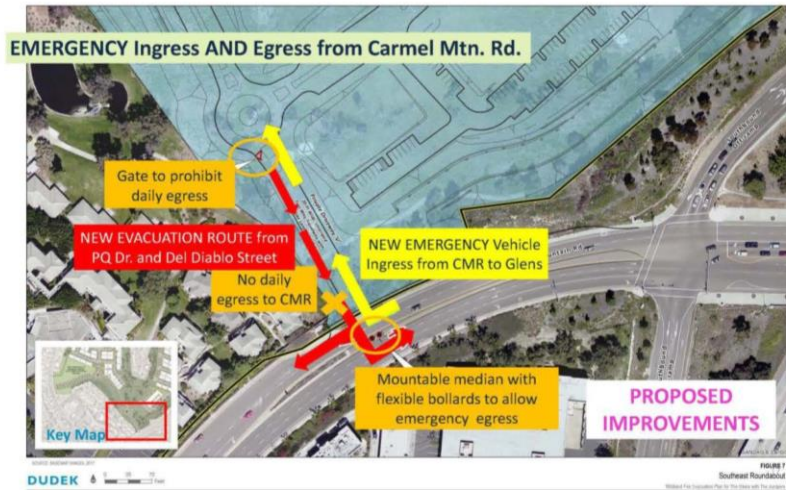
MANHATTAN PLANNING BOARD - LAND USE COMMITTEE  
9/12/20 - TOPIC FIRE PROTECTION PLANNING & EVACUATION, PART 2



COMMENTS

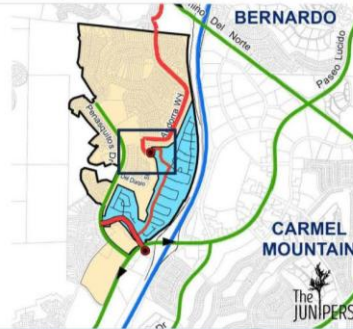
RESPONSES





## New Egress 2: Del Diablo Street

- **Current Ownership:** 100% Lennar owned
- **On-going Daily Use:** Pedestrian access ONLY
- **Emergency Use:** Ingress AND Egress to through Junipers south to CMR or north to Andorra
- **Proposed Enhancements/Improvements:**
  - Dimensions – widen to 24 feet to accommodate fire engine
  - Removable bollards to ensure no daily vehicular traffic
- **Ongoing Maintenance Responsibility**
  - Junipers HOA



BERNARDO RECREATION PLANNING BOARD - LAND USE COMMITTEE  
MAY 2019 - TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

## COMMENTS

## RESPONSES

### Access Road at Del Diablo – View Simulation 1

Existing Condition: View from Del Diablo Street,  
looking towards Junipers



Proposed Improvement:



The JUNIPERS

WINCHESTER PLANNING BOARD / LAND USE COMMITTEE  
QUEST – TOPIC: TREE PROTECTION PLANNING & EVALUATION, PART 2

Access Road at Del Diablo – View Simulation 2

Existing Condition: View from end of maintenance road, looking towards Del Diablo

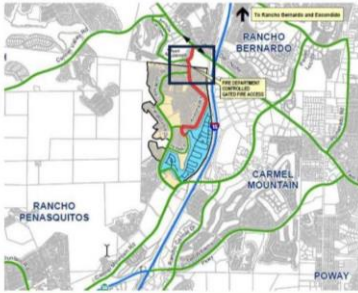
Proposed Improvement:



RANCHO PEÑASQUITOS PLANNING BOARD | LAND USE COMMITTEE  
WAZEP – TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

### New Egress 3: Andorra Way

Currently Inaccessible, Pedestrian access only



Existing Condition:



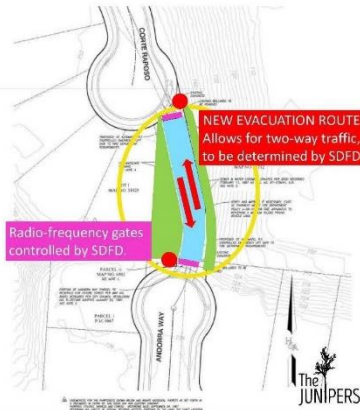
- \* Bollards currently concreted in place.
- \* No brush management
- \* Unsure whether road can support fire engine (50k lb.)





### Andorra Way – Improvements

- **On-going Daily Use:** City of SD maintenance vehicles for existing sewer and storm drain easements, public pedestrian access
- **Existing Easements:** City of SD storm drain, sewer and emergency
- **Suggested Enhancements/Improvements:**
  - Bollards removed and replaced with new, automatic gate and single bollard for pedestrian access
  - Enhanced brush thinning and management
  - Resurfaced pavement (if necessary. Pending analysis to determine if road can accommodate load)
- **Emergency Use: Ingress AND Egress**
  - Signage will be placed at each cul-de-sac denoting emergency use only
  - SDFD to determine use based on emergency scenario
  - NOT restricted to emergency vehicles – can be used for evacuation
- **Maintenance Responsibility**
  - City of San Diego – on-going
  - Junipers HOA – quarterly brush management
  - Junipers HOA – reserve for repair and/or replacement of new gate and bollard



PANCHO REFORMULAS PLANNING BOARD | LAND USE COMMITTEE  
6/24/20 | TOPIC: FIRE PROTECTION PLANNING & EVACUATION, PART 2

Andorra Way – View Simulation

Existing Condition:



Proposed Improvement:



The information presented today has been verified and confirmed by SD Fire Marshall, Chief Doug Perry.  
Members of The Junipers team met with Chief Perry to review the evacuation improvements and fire protection planning for The Junipers on 6/28/19.

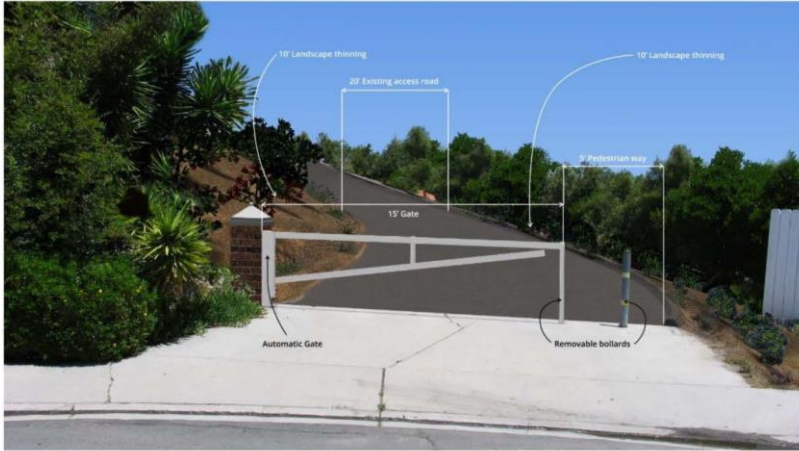


20200101 PRELIMINARY PLANNING RECORD 1 | LAND USE COMMITTEE  
5/14/2019 - 5/14/2019 - PRELIMINARY PLANNING & EVALUATION, REVISION 2

## COMMENTS

## RESPONSES

Andorra Way - Proposed Improvements



COMMENTS

RESPONSES



COMMENTS

RESPONSES



## COMMENTS

## RESPONSES

**From:** dpolitte@san.rr.com [mailto:dpolitte@san.rr.com]  
**Sent:** Wednesday, April 1, 2020 9:56 AM  
**To:** DSD EAS <DSDEAS@sandiego.gov>  
**Subject:** RE: Project Name: The Junipers Project No. 586670 / SCH No. 2018041032

Dear Ms. Osborn,

Please consider this e-mail as an official question about the above project's E.I.R. and please let me know that you have received this e-mail. In the first attachment on page one, section 5.14.3.1, the E.I.R. states that impacts related to a fire risk would be significant if a project would expose people of structures to a significant risk of loss, injury or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The Junipers project is less than 1,000 yards from the Black Mountain open space. **In the attached Burn rate calculations for Black Mountain open space the entire nearby housing areas (including the Junipers) could be engulfed in a fire with a less than two hour escape window.** The Dudek report indicates that the neighborhood would take three hours and thirty minutes to evacuate if the Junipers project is built. Building the Junipers project would therefore expose a significant number of people and structures to a significant risk of loss, injury or death. Please explain why the project is not creating a significant risk of loss, injury or death if by using the Dudek reports three and one half hour escape/evacuation window and now knowing the attached Camp Fire Burn Rate calculations for the nearby Black Mountain open space? Based just on the math the Junipers project could definitely create a significant risk of loss, injury or death to all of the new Junipers residents.

Regards,

Dale Politte  
 11146 Amazon Street  
 San Diego, CA 92129  
 858-472-5080 (cell/text)

SI39D-1

SI39D-1 The comment is correct regarding City significance thresholds. Also as alluded to in the comment, the project does not abut Black Mountain Open Space (BMOS). Existing Glens homes and Peñasquitos Drive are located between the project and the BMOS.

The Camp Fire burn times are not necessarily applicable to BMOS, as burn projections vary by topography, weather, wind direction, fuel source, etc., all of which are specific to individual locations, and, in fact, individual burn events. Specific to fires from the BMOS, however, the project Wildland Fire Evacuation Plan and in Section 5.14.4 of the EIR discusses various fire type scenarios.

Regardless of fire type, the project would substantially improve the condition for evacuating from the area. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements, which would result in a lessened evacuation time than currently exists for the Glens community. As a result, the project would not create a significant risk of loss, injury or death, but would reduce that likelihood from the existing condition.

Following the above comment, there are a number of pages excerpted from the Draft EIR with certain passages asterisked. No specific comments were made, and no responses can be provided.



SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

regulatory/industry standards and codes. Based on compliance with such regulatory requirements, potential impacts from construction-related hazardous materials would be effectively avoided or addressed.

#### Operation

Routine on-site storage and use of hazardous materials would occur in compliance with local, state, and federal standards. Compliance with these regulatory requirements would ensure that potential exposure of people to on-site hazardous materials would be less than significant.

#### 5.14.2.4 Mitigation, Monitoring and Reporting

##### HAZ-1: Soil Management Plan

Prior to the initiation of demolition and construction activities at the site, the Construction Manager and/or Grading Contractor shall submit a soil management plan (SMP) for approval by the City. The SMP shall outline the procedures for the contractor to identify, segregate, and dispose of any impacted soils discovered in the existing/previous maintenance areas of the subject site during the demolition, grubbing, and grading phases of project construction. The City Mitigation Monitoring Coordinator shall verify implementation of the SMP.

#### 5.14.3 Impact 2: Fire Risk

*Issue 2: Would the project expose people or structures to a significant risk of loss, injury, or death involving fire?*

Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The EIR shall discuss the human and public safety impacts from the potential fire hazards within and adjacent to the project.

##### 5.14.3.1 Impact Thresholds

Under the City threshold/Initial Study Checklist question, impacts related to fire risk would be significant if a project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

##### 5.14.3.2 Impact Analysis

Because a portion of the project site is located within the VHFHSZ associated with the Black Mountain Open Space Preserve to the west, a Fire Protection Plan (FPP) was prepared for the project (Dudek 2019b; EIR Appendix KS). As demonstrated in the FPP, the project would be in compliance with applicable regulatory requirements pertaining to fire hazards and prevention, including Section 142.0412 (Brush Management) of the City Municipal Code and the 2016 CFC. The project would incorporate fire-related design elements such as fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. Fuel modification would be provided within the project boundaries and would involve removing flammable vegetation and ensuring that remaining vegetation does not have the ability to

The Junipers Project

5.14-14

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

transmit fire to structures. On-site landscaping would consist of less-flammable plants that would be sufficiently hydrated via an automatic irrigation system. Overall, the project would convert the site from fire-prone weeds and grasses to fire-resistant structures and landscaping. Through compliance with applicable regulatory requirements and implementation of the recommendations included in the project-specific FPP, hazards associated with wildfires would be substantially reduced.

The project also would improve accessibility for emergency vehicles to/from the site and surrounding Glens neighborhood through provision of additional or upgraded travel routes, to be used by project and area residents as well as emergency vehicles (Dudek 2019b). Details as to roadway upgrades are provided in Section 3.0, and additionally discussed in Section 5.14.4, below. It is also noted that the provision of an irrigated and managed landscape on the project site, with structures built to current fire-resistive standards, would not only provide project residents with defensible living space, but also could deter fire moving east to west. This would provide a shielding benefit to the older Glens homes, constructed prior to many of the current fire safety standards.

#### 5.14.3.3 Significance of Impact

- \* Potential impacts related to wildfire hazards from implementation of the project would be less than significant, based on required compliance with applicable State and City standards associated with fire hazards and prevention, as well as through implementation of FPP recommendations.

#### 5.14.3.4 Mitigation, Monitoring and Reporting

- \* Impacts would be less than significant; therefore, no mitigation is required.

### 5.14.4 Impact 3: Emergency Response/Evacuation

Issue 3: *Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?*

#### 5.14.4.1 Impact Thresholds

Under the Initial Study Checklist question, public safety impacts would be significant if the project would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

#### 5.14.4.2 Impact Analysis

##### Construction

Construction of the project could require temporary detours and/or lane closures that could temporarily disrupt travel along existing roadways for periods of time within the construction zone. Emergency access to all surrounding properties, however, would be maintained throughout the construction period. In addition, a traffic control plan and haul route plan would be prepared and implemented as a standard City requirement during project construction, as discussed in Section 5.2, *Transportation/Circulation*. With implementation of these plans, the project would not impede access to publicly or privately owned land and would not interfere with emergency response

The Junipers Project

5.14-15

City of San Diego  
February 2020

## COMMENTS

## RESPONSES

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

Upon implementation of the project and its associated improvements, residents of the project would evacuate the area via the following routes, depending on the nature of the emergency (see Figure 14 of the Wildland Fire Evacuation Plan in Appendix K4, which depicts access/egress and evacuation time for the community with project implementation):

- **Egress to the south (and west) via Peñasquitos Drive** – This is and would continue to be the primary evacuation route for the project and for the Glen's community. Peñasquitos Drive connects with Carmel Mountain Road, which offers travel options to the east into Carmel Mountain Ranch and Poway, and connects to I-15 and SR-56.
- **Southeastern project site egress to Carmel Mountain Road** – This secondary access road would provide direct access from the project site to Carmel Mountain Road via proposed Private Driveway "V." This additional egress would be available to residents of the Glen's community as well as the project during an emergency and would include a mountable median with bollards, enabling law enforcement-controlled egress to the east or west along Carmel Mountain Road. This additional emergency egress route would provide an important alternative should Peñasquitos Drive become congested or impassible during an emergency. This egress route would effectively reduce the time needed to evacuate the Glen's community by 30 to 35 percent (Dudek 2019a).
- **Western project site egress to Del Diablo Street** – This proposed emergency-egress-only road would connect the project site with Del Diablo Street. Del Diablo Street connects to Del Diablo Way then to Peñasquitos Drive, which offers egress to the south.
- **Egress to the north via enhanced Andorra Way route** – Enhancement of the egress route that connects Andorra Way to Corte Raposo, but is currently inaccessible, is proposed as part of the project and would provide an evacuation route in the northerly portion of the Glen's community where no egress currently exists. Enhancements would include removing inoperable bollards, installing an automatic gate to SDFD requirements, resurfacing the road to carry the imposed load of fire apparatus, and ongoing brush management. Egress from the project site via this enhanced route would involve travel along Del Diablo Way, Andorra Way, Corte Raposo, Paseo Montanoso, and Camino Del Norte.

In the proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, the evacuation travel timeframe for the Glen's community and the future project residents is estimated at 3.5 hours, once notification has been provided. If the northerly emergency evacuation routes to Del Diablo Street and Andorra Way are not used, this would increase the evacuation time to 5.2 hours. This is in comparison to the estimated current evacuation time for The Glen's community (without the additional evacuation routes provided by The Junipers) of 8.3 hours (Dudek 2019a). Therefore, the project would reduce evacuation travel time within the project area and would not impair implementation of, or physically interfere with, the current San Diego County EOP or MHMP. Additionally, the project is subject to review by the SDFD and the SDDP to ensure compliance with applicable safety standards.

The Junipers Project

5.14-17

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

#### 5.14.4.3 Significance of Impact

##### Construction

City emergency safety standards and requirements pursuant to local regulations and standards are incorporated into the project design, including standard implementation of a traffic control plan during the construction period. As a result, no significant construction-period impacts related to fire hazards are identified.

##### Operation

~~X~~ The project Wildland Fire Evacuation Plan demonstrates that timely evacuation of the site is feasible and would be improved by the additional roadway and emergency egress connections provided by the project. Potential impacts related to impairment of or interference with adopted emergency response and evacuation plans (the 2014 Unified San Diego County Emergency Services Organization and County of San Diego Operational Area (EOP) from implementation of the project would therefore be less than significant. Emergency safety standards and requirements relevant to structure design, road width, etc. required by the City pursuant to local regulations and standards are incorporated into the project design. As a result, no significant impacts are anticipated with respect to fire-related issues. ~~X~~

#### 5.14.4.4 Mitigation, Monitoring and Reporting

Impacts would be less than significant; therefore, no mitigation is required.

#### 5.14.5 Impact 4: Airport Hazards

*Issue 4: Would the project result in a safety hazard for people residing or working in a designated airport influence area or within two miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP?*

##### 5.14.5.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2016a), impacts related to airport safety would be significant if the project would result in a safety hazard for people residing or working in a designated airport influence area or within 2.0 miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP.

##### 5.14.5.2 Impact Analysis

The nearest airport/air base to the project site is MCAS Miramar. The project is approximately 6.5 miles north of the designated accident potential zones associated with MCAS Miramar (which extend in a roughly east-west orientation rather than north-south), and is not subject to crash hazards from that facility. The project is not expected to construct any buildings that would be over 200 feet above the ground level or that would penetrate the 100:1 slope extending 20,000 feet away from the MCAS Miramar runway, which is approximately 7.5 miles away. No inconsistencies with the ALUCP are anticipated.

The Junipers Project

5.14-18

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 8.0  
Project Alternatives

It is important to note that implementation of this alternative would require that a project applicant would be interested in developing a golf course on the site, or that the City propose to develop it as a public golf course. The site was previously developed with a golf course that closed, citing maintenance costs including the cost of water as the reason for the golf course closure. If a private, for-profit golf course proves not to be financially feasible, then a public golf course would be the only option, implementing the golf course as a public recreational amenity.



### 8.4.3 Reduced Intensity Development Alternative

#### 8.4.3.1 Description

There were no feasible residential development alternatives identified that could eliminate any of the impacts associated with the project. Development necessarily involves removal of the on-site poorly compacted fill material and impacts to the on-site non-wetland, jurisdictional drainage. As calculated in the Trigger Analysis Memo (LLG January, 2020) that is provided in Appendix B, the need for a traffic signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and roundabout at Peñasquitos Drive/Janal Way/Future Project Access is triggered at just 54 and 27 homes, respectively, which represent 10 percent and 5 percent, respectively, of the project units. Development of 5 or 10 percent of the proposed units would not represent a viable development for the project applicant. Therefore, an alternative was selected that would reduce but not eliminate project impacts, and would result in a feasible development for the applicant to implement. The Reduced Intensity Development Alternative would involve a similar development proposal to the project, but with a 25 percent reduction in the number of residential units. Specifically, this alternative considers the development of 402 age-restricted homes, including 341 market rate and 61 affordable age-restricted residences. The mobility improvements and community facilities, as well as sustainable design features, proposed as part of the project also would occur under this alternative, but at a similarly reduced rate, and this alternative is anticipated to involve slightly larger market rate homes.

#### 8.4.3.2 Environmental Analysis

##### Land Use

Under the Reduced Intensity Development Alternative, the remnants of the former golf course would be removed and replaced with a residential development, similar to the project, but with 25 percent fewer residences, mobility improvements, community facilities, and sustainable design features. This alternative would include a smaller public park, sufficient to meet the parkland requirements for the alternative. It would also provide public access to a smaller social loop trail around the project site and a smaller private park with mobility enhancing features. While this alternative would involve a new site plan that could potentially site planned residential uses farther from I-15, homes and exterior usable spaces would still be exposed to noise from I-15 in excess of 60 CNEL, requiring measures similar to those identified in the project Acoustical Analysis Report to be incorporated into the design of this alternative. It is expected that this alternative would also need to incorporate private exterior use area noise barriers and higher STC-rated building materials, in order to be consistent with General Plan land use noise compatibility standards. Land use impacts associated with noise compatibility would be less than significant and similar for the project and this alternative.

The Junipers Project

8-19

City of San Diego  
February 2020

## COMMENTS

## RESPONSES

dpolitte@san.rr.com

Subject: FW: Camp Fire - November 2018 - statistics

Over 24 hours, the CAMP fire burned at the rate of about 0.8 acres per second or 48.6 acres per minute.

The Camp Fire's most significant growth happened Thursday afternoon, when it grew 10,000 acres in about 90 minutes, more than one football field per second,

A football field is approximately 1.32 acres. Black Mountain open space park is currently 2,352 acres, with expansion a future possibility. Converting Acres to football fields - Black Mountain open space equals approximately 1,782 football fields.

In the CAMP fire's first three hours, the CAMP fire grew to 5,000 acres, burning an area the size of a football field every three seconds in that period.

If a similar ( 40-50 MPH Wind driven fire ) hits the Black Mountain open space park ( using the CAMP FIRE burn rate of one football field every three seconds ) the entire Black Mountain Open space park would be completely burned in approximately 5,346 seconds. This equals approximately 89.1 minutes to burn the entire Black Mountain Open Space. Approximately One and One half hour from the start of a fire to the time it runs out of open space to burn. Using the CAMP Fire one football field per second rate of burn would mean that the entire Black Mountain Open Space would be burned in approximately 30 minutes.

During the 2007 witch creek fire it took us over 60 minutes to go one mile from Rolling Hills Elementary to the 15 freeway on ramp. If we received an evacuation order in the first ten minutes of the start of a fire that would leave less than 20 minutes to load up my family and get in my car to get in line to escape. During the witch creek fire many of my neighbors reported it took them over one hour to get to the 15 freeway on-ramp. ( It took them longer to load up and leave / get in line.)

500+ more households with only one way in and one way out means we are cutting our odds of escaping alive considerably.

SI39D-2 Please see information regarding improvements in predictive modeling and coordination among City, County, and state agencies, in Sections 2 and 3 of the Wildland Fire Evacuation Plan.

Please also refer to the Evacuation Plan and to Section 5.14.4 of the EIR for information regarding burn times being specific to each fire event, and to Response to Comment 1 from Derbique (Letter SI4) regarding the emergency evacuation and access improvements proposed to be provided by the project and how it would lessen evacuation time from existing conditions.



## COMMENTS

## RESPONSES

SI39E-1

**From:** [dpolitte@san.rr.com](mailto:dpolitte@san.rr.com)  
**To:** [DSD\\_FAS](#)  
**Subject:** Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Thursday, April 02, 2020 10:25:52 AM  
**Attachments:** E.I.R. areas of most concern.pdf

Dear Ms. Osborn,

I have not received a confirmation of receipt for the below e-mail/question. Please let me know that you have received the below e-mail and attachments.

Regards,

Dale Politte  
 11146 Amazon Street  
 San Diego, CA 92129  
 858-472-5080 (cell/text)

**From:** [dpolitte@san.rr.com](mailto:dpolitte@san.rr.com) [mailto:[dpolitte@san.rr.com](mailto:dpolitte@san.rr.com)]  
**Sent:** Wednesday, April 01, 2020 9:56 AM  
**To:** 'DSDEAS@sandiego.gov'  
**Subject:** RE: Project Name: The Junipers Project No. 586670 / SCH No. 2018041032

Dear Ms. Osborn,

Please consider this e-mail as an official question about the above project's E.I.R. and please let me know that you have received this e-mail. In the first attachment on page one, section 5.14.3.1, the E.I.R. states that impacts related to a fire risk would be significant if a project would expose people of structures to a significant risk of loss, injury or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The Junipers project is less than 1,000 yards from the Black Mountain open space. **In the attached Burn rate calculations for Black Mountain open space the entire nearby housing areas (including the Junipers) could be engulfed in a fire with a less than two hour escape window.** The Dudek report indicates that the neighborhood would take three hours and thirty minutes to evacuate if the Junipers project is built. Building the Junipers project would therefore expose a significant number of people and structures to a significant risk of loss, injury or death. Please explain why the project is not creating a significant risk of loss, injury or death if by using the Dudek reports three and one half hour escape/evacuation window and now knowing the attached Camp Fire Burn Rate calculations for the nearby Black Mountain open space? Based just on the math the Junipers project could definitely create a significant risk of loss, injury or death to all of the new Junipers residents.

Regards,

Dale Politte  
 11146 Amazon Street  
 San Diego, CA 92129  
 858-472-5080 (cell/text)

SI39E-1 This comment is a verbatim resubmittal of your communication of April 1, 2020 (comment letter SI39D). Please refer to responses to that submittal, immediately above in this document.



## COMMENTS

## RESPONSES

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

regulatory/industry standards and codes. Based on compliance with such regulatory requirements, potential impacts from construction-related hazardous materials would be effectively avoided or addressed.

#### Operation

Routine on-site storage and use of hazardous materials would occur in compliance with local, state, and federal standards. Compliance with these regulatory requirements would ensure that potential exposure of people to on-site hazardous materials would be less than significant.

#### 5.14.2.4 Mitigation, Monitoring and Reporting

##### HAZ-1: Soil Management Plan

Prior to the initiation of demolition and construction activities at the site, the Construction Manager and/or Grading Contractor shall submit a soil management plan (SMP) for approval by the City. The SMP shall outline the procedures for the contractor to identify, segregate, and dispose of any impacted soils discovered in the existing/previous maintenance areas of the subject site during the demolition, grubbing, and grading phases of project construction. The City Mitigation Monitoring Coordinator shall verify implementation of the SMP.

#### 5.14.3 Impact 2: Fire Risk

*Issue 2: Would the project expose people or structures to a significant risk of loss, injury, or death involving fire?*

Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The EIR shall discuss the human and public safety impacts from the potential fire hazards within and adjacent to the project.

##### 5.14.3.1 Impact Thresholds

Under the City threshold/Initial Study Checklist question, impacts related to fire risk would be significant if a project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

##### 5.14.3.2 Impact Analysis

Because a portion of the project site is located within the VHFHSZ associated with the Black Mountain Open Space Preserve to the west, a Fire Protection Plan (FPP) was prepared for the project (Dudek 2019b; EIR Appendix KS). As demonstrated in the FPP, the project would be in compliance with applicable regulatory requirements pertaining to fire hazards and prevention, including Section 142.0412 (Brush Management) of the City Municipal Code and the 2016 CFC. The project would incorporate fire-related design elements such as fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. Fuel modification would be provided within the project boundaries and would involve removing flammable vegetation and ensuring that remaining vegetation does not have the ability to

The Junipers Project

5.14-14

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670 Draft Environmental Impact Report	Section 5.14 Health and Safety
<p>transmit fire to structures. On-site landscaping would consist of less-flammable plants that would be sufficiently hydrated via an automatic irrigation system. Overall, the project would convert the site from fire-prone weeds and grasses to fire-resistant structures and landscaping. Through compliance with applicable regulatory requirements and implementation of the recommendations included in the project-specific FPP, hazards associated with wildfires would be substantially reduced.</p>	
<p>The project also would improve accessibility for emergency vehicles to/from the site and surrounding Glens neighborhood through provision of additional or upgraded travel routes, to be used by project and area residents as well as emergency vehicles (Dudek 2019b). Details as to roadway upgrades are provided in Section 3.0, and additionally discussed in Section 5.14.4, below. It is also noted that the provision of an irrigated and managed landscape on the project site, with structures built to current fire-resistant standards, would not only provide project residents with defensible living space, but also could deter fire moving east to west. This would provide a shielding benefit to the older Glens homes, constructed prior to many of the current fire safety standards.</p>	
<b>5.14.3.3 Significance of Impact</b>	
<p>✖ Potential impacts related to wildfire hazards from implementation of the project would be less than significant, based on required compliance with applicable State and City standards associated with fire hazards and prevention, as well as through implementation of FPP recommendations.</p>	
<b>5.14.3.4 Mitigation, Monitoring and Reporting</b>	
<p>✖ Impacts would be less than significant; therefore, no mitigation is required.</p>	
<b>5.14.4 Impact 3: Emergency Response/Evacuation</b>	
<p>Issue 3: Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?</p>	
<b>5.14.4.1 Impact Thresholds</b>	
<p>Under the Initial Study Checklist question, public safety impacts would be significant if the project would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.</p>	
<b>5.14.4.2 Impact Analysis</b>	
<b>Construction</b>	
<p>Construction of the project could require temporary detours and/or lane closures that could temporarily disrupt travel along existing roadways for periods of time within the construction zone. Emergency access to all surrounding properties, however, would be maintained throughout the construction period. In addition, a traffic control plan and haul route plan would be prepared and implemented as a standard City requirement during project construction, as discussed in Section 5.2, <i>Transportation/Circulation</i>. With implementation of these plans, the project would not impede access to publicly or privately owned land and would not interfere with emergency response</p>	
The Junipers Project	City of San Diego February 2020

SCI No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

Upon implementation of the project and its associated improvements, residents of the project would evacuate the area via the following routes, depending on the nature of the emergency (see Figure 14 of the Wildland Fire Evacuation Plan in Appendix K4, which depicts access/egress and evacuation time for the community with project implementation):

- **Egress to the south (and west) via Peñasquitos Drive** - This is and would continue to be the primary evacuation route for the project and for the Glen's community. Peñasquitos Drive connects with Carmel Mountain Road, which offers travel options to the east into Carmel Mountain Ranch and Poway, and connects to I-15 and SR-56.
- **Southeastern project site egress to Carmel Mountain Road** - This secondary access road would provide direct access from the project site to Carmel Mountain Road via proposed Private Driveway "V." This additional egress would be available to residents of the Glen's community as well as the project during an emergency and would include a mountable median with bollards, enabling law enforcement-controlled egress to the east or west along Carmel Mountain Road. This additional emergency egress route would provide an important alternative should Peñasquitos Drive become congested or impassible during an emergency. This egress route would effectively reduce the time needed to evacuate the Glen's community by 30 to 35 percent (Dudek 2019a).
- **Western project site egress to Del Diablo Street** - This proposed emergency-egress-only road would connect the project site with Del Diablo Street. Del Diablo Street connects to Del Diablo Way then to Peñasquitos Drive, which offers egress to the south.
- **Egress to the north via enhanced Andorra Way route** - Enhancement of the egress route that connects Andorra Way to Corte Raposo, but is currently inaccessible, is proposed as part of the project and would provide an evacuation route in the northerly portion of the Glen's community where no egress currently exists. Enhancements would include removing inoperable bollards, installing an automatic gate to SDFD requirements, resurfacing the road to carry the imposed load of fire apparatus, and ongoing brush management. Egress from the project site via this enhanced route would involve travel along Del Diablo Way, Andorra Way, Corte Raposo, Paseo Montanoso, and Camino Del Norte.

In the proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, the evacuation travel timeframe for the Glen's community and the future project residents is estimated at 3.5 hours, once notification has been provided. If the northerly emergency evacuation routes to Del Diablo Street and Andorra Way are not used, this would increase the evacuation time to 5.2 hours. This is in comparison to the estimated current evacuation time for The Glen's community (without the additional evacuation routes provided by The Junipers) of 8.3 hours (Dudek 2019a). Therefore, the project would reduce evacuation travel time within the project area and would not impair implementation of, or physically interfere with, the current San Diego County EOP or MHMP. Additionally, the project is subject to review by the SDFD and the SDPD to ensure compliance with applicable safety standards.

The Junipers Project

5.14-17

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670 Draft Environmental Impact Report	Section 5.14 Health and Safety
<p><b>5.14.4.3 Significance of Impact</b></p> <p><b>Construction</b></p> <p>City emergency safety standards and requirements pursuant to local regulations and standards are incorporated into the project design, including standard implementation of a traffic control plan during the construction period. As a result, no significant construction-period impacts related to fire hazards are identified.</p> <p><b>Operation</b></p> <p><del>X</del> The project Wildland Fire Evacuation Plan demonstrates that timely evacuation of the site is feasible and would be improved by the additional roadway and emergency egress connections provided by the project. Potential impacts related to impairment of or interference with adopted emergency response and evacuation plans (the 2014 Unified San Diego County Emergency Services Organization and County of San Diego Operational Area EOP) from implementation of the project would therefore be less than significant. Emergency safety standards and requirements relevant to structure design, road width, etc. required by the City pursuant to local regulations and standards are incorporated into the project design. As a result, no significant impacts are anticipated with respect to fire-related issues.</p> <p><b>5.14.4.4 Mitigation, Monitoring and Reporting</b></p> <p>Impacts would be less than significant; therefore, no mitigation is required.</p>	
<p><b>5.14.5 Impact 4: Airport Hazards</b></p> <p><i>Issue 4: Would the project result in a safety hazard for people residing or working in a designated airport influence area or within two miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP?</i></p> <p><b>5.14.5.1 Impact Thresholds</b></p> <p>Based on the City Significance Determination Thresholds (2016a), impacts related to airport safety would be significant if the project would result in a safety hazard for people residing or working in a designated airport influence area or within 2.0 miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP.</p> <p><b>5.14.5.2 Impact Analysis</b></p> <p>The nearest airport/air base to the project site is MCAS Miramar. The project is approximately 6.5 miles north of the designated accident potential zones associated with MCAS Miramar (which extend in a roughly east-west orientation rather than north-south), and is not subject to crash hazards from that facility. The project is not expected to construct any buildings that would be over 200 feet above the ground level or that would penetrate the 100:1 slope extending 20,000 feet away from the MCAS Miramar runway, which is approximately 7.5 miles away. No inconsistencies with the ALUCP are anticipated.</p>	
The Junipers Project	5.14-18 City of San Diego February 2020

SCH No. 2018041332, Project No. 586570  
Draft Environmental Impact Report

Section 8.0  
Project Alternatives

It is important to note that implementation of this alternative would require that a project applicant would be interested in developing a golf course on the site, or that the City propose to develop it as a public golf course. The site was previously developed with a golf course that closed, citing maintenance costs including the cost of water as the reason for the golf course closure. If a private, for-profit golf course proves not to be financially feasible, then a public golf course would be the only option, implementing the golf course as a public recreational amenity.



#### 8.4.3 Reduced Intensity Development Alternative

##### 8.4.3.1 Description

There were no feasible residential development alternatives identified that could eliminate any of the impacts associated with the project. Development necessarily involves removal of the on-site poorly compacted fill material and impacts to the on-site non-wetland, jurisdictional drainage. As calculated in the Trigger Analysis Memo (LLG January, 2020) that is provided in Appendix B, the need for a traffic signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and roundabout at Peñasquitos Drive/Janal Way/Future Project Access is triggered at just 54 and 27 homes, respectively, which represent 10 percent and 5 percent, respectively, of the project units. Development of 5 or 10 percent of the proposed units would not represent a viable development for the project applicant. Therefore, an alternative was selected that would reduce but not eliminate project impacts, and would result in a feasible development for the applicant to implement. The Reduced Intensity Development Alternative would involve a similar development proposal to the project, but with a 25 percent reduction in the number of residential units. Specifically, this alternative considers the development of 402 age-restricted homes, including 341 market rate and 61 affordable age-restricted residences. The mobility improvements and community facilities, as well as sustainable design features, proposed as part of the project also would occur under this alternative, but at a similarly reduced rate, and this alternative is anticipated to involve slightly larger market rate homes.

##### 8.4.3.2 Environmental Analysis

###### Land Use

Under the Reduced Intensity Development Alternative, the remnants of the former golf course would be removed and replaced with a residential development, similar to the project, but with 25 percent fewer residences, mobility improvements, community facilities, and sustainable design features. This alternative would include a smaller public park, sufficient to meet the parkland requirements for the alternative. It would also provide public access to a smaller social loop trail around the project site and a smaller private park with mobility enhancing features. While this alternative would involve a new site plan that could potentially site planned residential uses farther from I-15, homes and exterior usable spaces would still be exposed to noise from I-15 in excess of 60 CNEL, requiring measures similar to those identified in the project Acoustical Analysis Report to be incorporated into the design of this alternative. It is expected that this alternative would also need to incorporate private exterior use area noise barriers and higher STC-rated building materials, in order to be consistent with General Plan land use noise compatibility standards. Land use impacts associated with noise compatibility would be less than significant and similar for the project and this alternative.

The Junipers Project

8-19

City of San Diego  
February 2020

## COMMENTS

## RESPONSES

**From:** dpolitte@san.rr.com  
**Sent:** Thursday, April 02, 2020 11:14 AM  
**To:** DSD EAS  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Attachments:** E.I.R. areas of most concern.pdf; Evacuation Plan.pdf

Dear Ms. Osborn,

SI39F-1

Please consider this e-mail as an official question about the above project's E.I.R. and please let me know that you have received this e-mail. In the first attachment on page two, section 5.14.4 Impact 3: Emergency Response Evacuation. Would **the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?** I have attached the adopted emergency evacuation plan for Rancho Penasquitos and as identified in the plan ( on page 3 ) is an evacuation route that uses the PQ Drive intersection with Carmel Mountain Road. The adopted evacuation plan also uses the on-ramp onto interstate 15 one stop light away from the PQ Drive intersection with Carmel Mountain Road. Currently there are over 1505 housing units using this PQ Drive intersection with Carmel Mountain Road to evacuate. By adding the Junipers Plan ( 536 units ) and the NEW Millenium PQ (331 units) and the increase of 261 units at PQ Villages (now under construction) the intersection of Penasquitos Drive and Carmel Mountain Road and the Carmel Mountain Road on ramps will all be made so over loaded that no one will be able to escape efficiently following the adopted plan. I was personally evacuated both in 2003 and in 2007 and during both evacuations it took me over one hour to go from Rolling Hills Elementary school to get onto interstate 15 to exit the area. **The choke points during both evacuations were the stop lights at the PQ Drive intersection with Carmel Mountain Road and the I-15 on ramps.** My question is how does adding more occupants trying to evacuate into two already known choke points make the project **not impair or interfere** with the adopted evacuation plan? Please see below.

Regards,

Dale Politte  
 11146 Amazon Street  
 San Diego, CA 92129  
 858-472-5080 (cell/text)

SI39F-1 The project would not impair implementation of, nor physically interfere with, an adopted emergency response plan or emergency evacuation plan. Please note that the attached Rancho de los Peñasquitos Evacuation Plan is not an adopted emergency response or evacuation plan. It is a community planning document that helps identify "readiness" efforts. The plan primarily provides direction to homeowners about how to prepare for, and be ready to, evacuate. General evacuation routes also are schematically identified. Nonetheless, once evacuated, the plan states: "It is important that evacuees follow the directions of traffic control personnel" who will identify the appropriate route. The project also would not conflict with the Rancho de los Peñasquitos Evacuation Plan. Rather, the project would alleviate impact on the Carmel Mountain Road and Peñasquitos Drive intersection by:

- Allowing diversion of Glens traffic directly through the project to Carmel Mountain Road, or
- Routing traffic to the northeast via Andorra Way to Camino del Norte.

Both these options avoid the noted intersection, and the Andorra Way improvement also would allow evacuees to avoid entering I-15 from Carmel Mountain Road. Regardless, once on the road, as identified in the attached Rancho de los Peñasquitos Evacuation Plan, "officials will determine the

## COMMENTS

## RESPONSES

SI39F-1 (cont.) areas to be evacuated and the escape routes to use depending on fire behavior” and “it is important that evacuees follow the directions of traffic control personnel.”

Please also refer to the Responses to Comment 1 from Derby (Letter SI4) regarding benefits to evacuation time resulting from the project. Please see information regarding improvements in predictive modeling and coordination among City, County, and state agencies in Sections 2 and 3 of the Wildland Fire Evacuation Plan.



SDH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

regulatory/industry standards and codes. Based on compliance with such regulatory requirements, potential impacts from construction-related hazardous materials would be effectively avoided or addressed.

#### Operation

Routine on-site storage and use of hazardous materials would occur in compliance with local, state, and federal standards. Compliance with these regulatory requirements would ensure that potential exposure of people to on-site hazardous materials would be less than significant.

#### 5.14.2.4 Mitigation, Monitoring and Reporting

##### HAZ-1: Soil Management Plan

Prior to the initiation of demolition and construction activities at the site, the Construction Manager and/or Grading Contractor shall submit a soil management plan (SMP) for approval by the City. The SMP shall outline the procedures for the contractor to identify, segregate, and dispose of any impacted soils discovered in the existing/previous maintenance areas of the subject site during the demolition, grubbing, and grading phases of project construction. The City Mitigation Monitoring Coordinator shall verify implementation of the SMP.

#### 5.14.3 Impact 2: Fire Risk

*Issue 2: Would the project expose people or structures to a significant risk of loss, injury, or death involving fire?*

Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The EIR shall discuss the human and public safety impacts from the potential fire hazards within and adjacent to the project.

##### 5.14.3.1 Impact Thresholds

Under the City threshold/Initial Study Checklist question, impacts related to fire risk would be significant if a project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

##### 5.14.3.2 Impact Analysis

Because a portion of the project site is located within the VHHHSZ associated with the Black Mountain Open Space Preserve to the west, a Fire Protection Plan (FPP) was prepared for the project (Dudek 2019b; EIR Appendix K5). As demonstrated in the FPP, the project would be in compliance with applicable regulatory requirements pertaining to fire hazards and prevention, including Section 142.0412 (Brush Management) of the City Municipal Code and the 2016 CFC. The project would incorporate fire-related design elements such as fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. Fuel modification would be provided within the project boundaries and would involve removing flammable vegetation and ensuring that remaining vegetation does not have the ability to

The Junipers Project

5.14-14

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

transmit fire to structures. On-site landscaping would consist of less-flammable plants that would be sufficiently hydrated via an automatic irrigation system. Overall, the project would convert the site from fire-prone weeds and grasses to fire-resistant structures and landscaping. Through compliance with applicable regulatory requirements and implementation of the recommendations included in the project-specific FPP, hazards associated with wildfires would be substantially reduced.

The project also would improve accessibility for emergency vehicles to/from the site and surrounding Glens neighborhood through provision of additional or upgraded travel routes, to be used by project and area residents as well as emergency vehicles (Dudek 2019b). Details as to roadway upgrades are provided in Section 3.0, and additionally discussed in Section 5.14.4, below. It is also noted that the provision of an irrigated and managed landscape on the project site, with structures built to current fire-resistive standards, would not only provide project residents with defensible living space, but also could deter fire moving east to west. This would provide a shielding benefit to the older Glens homes, constructed prior to many of the current fire safety standards.

#### 5.14.3.3 Significance of Impact

- \* Potential impacts related to wildfire hazards from implementation of the project would be less than significant, based on required compliance with applicable State and City standards associated with fire hazards and prevention, as well as through implementation of FPP recommendations.

#### 5.14.3.4 Mitigation, Monitoring and Reporting

- \* Impacts would be less than significant; therefore, no mitigation is required.

### 5.14.4 Impact 3: Emergency Response/Evacuation

Issue 3: Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

#### 5.14.4.1 Impact Thresholds

Under the Initial Study Checklist question, public safety impacts would be significant if the project would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

#### 5.14.4.2 Impact Analysis

##### Construction

Construction of the project could require temporary detours and/or lane closures that could temporarily disrupt travel along existing roadways for periods of time within the construction zone. Emergency access to all surrounding properties, however, would be maintained throughout the construction period. In addition, a traffic control plan and haul route plan would be prepared and implemented as a standard City requirement during project construction, as discussed in Section 5.2, *Transportation/Circulation*. With implementation of these plans, the project would not impede access to publicly or privately owned land and would not interfere with emergency response.

The Junipers Project

5.14-15

City of San Diego  
February 2020

## COMMENTS

## RESPONSES

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

Upon implementation of the project and its associated improvements, residents of the project would evacuate the area via the following routes, depending on the nature of the emergency (see Figure 14 of the Wildland Fire Evacuation Plan in Appendix K4, which depicts access/egress and evacuation time for the community with project implementation):

- **Egress to the south (and west) via Peñasquitos Drive** – This is and would continue to be the primary evacuation route for the project and for the Glen's community. Peñasquitos Drive connects with Carmel Mountain Road, which offers travel options to the east into Carmel Mountain Ranch and Poway, and connects to I-15 and SR-56.
- **Southeastern project site egress to Carmel Mountain Road** – This secondary access road would provide direct access from the project site to Carmel Mountain Road via proposed Private Driveway "V." This additional egress would be available to residents of the Glen's community as well as the project during an emergency and would include a mountable median with bollards, enabling law enforcement-controlled egress to the east or west along Carmel Mountain Road. This additional emergency egress route would provide an important alternative should Peñasquitos Drive become congested or impassible during an emergency. This egress route would effectively reduce the time needed to evacuate the Glen's community by 30 to 35 percent (Dudek 2019a).
- **Western project site egress to Del Diablo Street** – This proposed emergency-egress-only road would connect the project site with Del Diablo Street. Del Diablo Street connects to Del Diablo Way then to Peñasquitos Drive, which offers egress to the south.
- **Egress to the north via enhanced Andorra Way route** – Enhancement of the egress route that connects Andorra Way to Corte Raposo, but is currently inaccessible, is proposed as part of the project and would provide an evacuation route in the northerly portion of the Glen's community where no egress currently exists. Enhancements would include removing inoperable bollards, installing an automatic gate to SDFD requirements, resurfacing the road to carry the imposed load of fire apparatus, and ongoing brush management. Egress from the project site via this enhanced route would involve travel along Del Diablo Way, Andorra Way, Corte Raposo, Paseo Montanoso, and Camiño Del Norte.

In the proposed condition, which includes the additional egress routes and access route enhancements proposed by the project, the evacuation travel timeframe for the Glen's community and the future project residents is estimated at 3.5 hours, once notification has been provided. If the northerly emergency evacuation routes to Del Diablo Street and Andorra Way are not used, this would increase the evacuation time to 5.2 hours. This is in comparison to the estimated current evacuation time for The Glen's community (without the additional evacuation routes provided by The Junipers) of 8.3 hours (Dudek 2019a). Therefore, the project would reduce evacuation travel time within the project area and would not impair implementation of, or physically interfere with, the current San Diego County EOP or MHMP. Additionally, the project is subject to review by the SDFD and the SDPD to ensure compliance with applicable safety standards.

The Junipers Project

5.14-17

City of San Diego  
February 2020

SCH No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 5.14  
Health and Safety

#### 5.14.4.3 Significance of Impact

##### Construction

City emergency safety standards and requirements pursuant to local regulations and standards are incorporated into the project design, including standard implementation of a traffic control plan during the construction period. As a result, no significant construction-period impacts related to fire hazards are identified.

##### Operation

The project Wildland Fire Evacuation Plan demonstrates that timely evacuation of the site is feasible and would be improved by the additional roadway and emergency egress connections provided by the project. Potential impacts related to impairment of or interference with adopted emergency response and evacuation plans (the 2014 Unified San Diego County Emergency Services Organization and County of San Diego Operational Area (EOP) from implementation of the project would therefore be less than significant. Emergency safety standards and requirements relevant to structure design, road width, etc., required by the City pursuant to local regulations and standards are incorporated into the project design. As a result, no significant impacts are anticipated with respect to fire-related issues.

#### 5.14.4.4 Mitigation, Monitoring and Reporting

Impacts would be less than significant; therefore, no mitigation is required.

#### 5.14.5 Impact 4: Airport Hazards

*Issue 4: Would the project result in a safety hazard for people residing or working in a designated airport influence area or within two miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP?*

##### 5.14.5.1 Impact Thresholds

Based on the City Significance Determination Thresholds (2016a), impacts related to airport safety would be significant if the project would result in a safety hazard for people residing or working in a designated airport influence area or within 2.0 miles of a private airstrip or heliport facility that is not covered by an adopted ALUCP.

##### 5.14.5.2 Impact Analysis

The nearest airport/air base to the project site is MCAS Miramar. The project is approximately 6.5 miles north of the designated accident potential zones associated with MCAS Miramar (which extend in a roughly east-west orientation rather than north-south), and is not subject to crash hazards from that facility. The project is not expected to construct any buildings that would be over 200 feet above the ground level or that would penetrate the 100:1 slope extending 20,000 feet away from the MCAS Miramar runway, which is approximately 7.5 miles away. No inconsistencies with the ALUCP are anticipated.

The Junipers Project

5.14-18

City of San Diego  
February 2020

SC# No. 2018041032; Project No. 586670  
Draft Environmental Impact Report

Section 8.0  
Project Alternatives

It is important to note that implementation of this alternative would require that a project applicant would be interested in developing a golf course on the site, or that the City propose to develop it as a public golf course. The site was previously developed with a golf course that closed, citing maintenance costs including the cost of water as the reason for the golf course closure. If a private, for-profit golf course proves not to be financially feasible, then a public golf course would be the only option, implementing the golf course as a public recreational amenity.



#### 8.4.3 Reduced Intensity Development Alternative

##### 8.4.3.1 Description

There were no feasible residential development alternatives identified that could eliminate any of the impacts associated with the project. Development necessarily involves removal of the on-site poorly compacted fill material and impacts to the on-site non-wetland, jurisdictional drainage. As calculated in the Trigger Analysis Memo (LLG January, 2020) that is provided in Appendix B, the need for a traffic signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and roundabout at Peñasquitos Drive/Janal Way/Future Project Access is triggered at just 54 and 27 homes, respectively, which represent 10 percent and 5 percent, respectively, of the project units. Development of 5 or 10 percent of the proposed units would not represent a viable development for the project applicant. Therefore, an alternative was selected that would reduce but not eliminate project impacts, and would result in a feasible development for the applicant to implement. The Reduced Intensity Development Alternative would involve a similar development proposal to the project, but with a 25 percent reduction in the number of residential units. Specifically, this alternative considers the development of 402 age-restricted homes, including 341 market rate and 61 affordable age-restricted residences. The mobility improvements and community facilities, as well as sustainable design features, proposed as part of the project also would occur under this alternative, but at a similarly reduced rate, and this alternative is anticipated to involve slightly larger market rate homes.

##### 8.4.3.2 Environmental Analysis

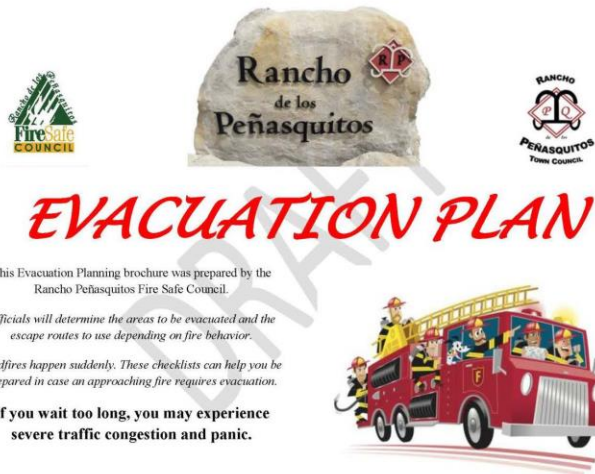
###### Land Use

Under the Reduced Intensity Development Alternative, the remnants of the former golf course would be removed and replaced with a residential development, similar to the project, but with 25 percent fewer residences, mobility improvements, community facilities, and sustainable design features. This alternative would include a smaller public park, sufficient to meet the parkland requirements for the alternative. It would also provide public access to a smaller social loop trail around the project site and a smaller private park with mobility enhancing features. While this alternative would involve a new site plan that could potentially site planned residential uses farther from I-15, homes and exterior usable spaces would still be exposed to noise from I-15 in excess of 60 CNEL, requiring measures similar to those identified in the project Acoustical Analysis Report to be incorporated into the design of this alternative. It is expected that this alternative would also need to incorporate private exterior use area noise barriers and higher STC-rated building materials, in order to be consistent with General Plan land use noise compatibility standards. Land use impacts associated with noise compatibility would be less than significant and similar for the project and this alternative.

The Junipers Project

8-19

City of San Diego  
February 2020



### Advanced Preparation

*Complete this checklist before the threat!*

- ☐ 1. Update your homeowners insurance
- ☐ 2. Create a home inventory
- ☐ 3. Prepare a defensible space for firefighters
- ☐ 4. Trim flammable vegetation away from wood structures
- ☐ 5. Remove flammable litter from your roof and gutters
- ☐ 6. Test your smoke alarms and change batteries
- ☐ 7. Check expiration dates on your fire extinguishers
- ☐ 8. Protect your vents and eaves from embers
- ☐ 9. Shake and pre-position your Fire Prevention Gel
- ☐ 10. Register cell phones for emergency alerts at [www.ready.sandiego.org](http://www.ready.sandiego.org)
- ☐ 11. Prepare a list of daily essentials
- ☐ 12. Pack Grab-and-Go Bags for each family member
- ☐ 13. Make copies — paper or electronic — of important documents
- ☐ 14. Learn your children's school Disaster Plan
- ☐ 15. Prepare travel cases and a plan for your pets
- ☐ 16. Study the evacuation routes for your neighborhood
- ☐ 17. Know your evacuation destination
- ☐ 18. Establish a family meeting place outside of Rancho Peñasquitos
- ☐ 19. Plan for evacuation assistance, if necessary
- ☐ 20. Become familiar with "2-1-1" San Diego services

Important Websites:

<http://www.ready.sandiego.org/>  
<http://www.readyfirewildfire.org/>  
[http://www.educatesfire/Prepare/ homeowner\\_Wildfire\\_Assessment/](http://www.educatesfire/Prepare/ homeowner_Wildfire_Assessment/)  
<http://www.livingwithfire.info/>

### Get Ready to Go

*If you hear there is a wildfire approaching San Diego, it is time to get ready. It is time to*

**PREPARE TO GO**

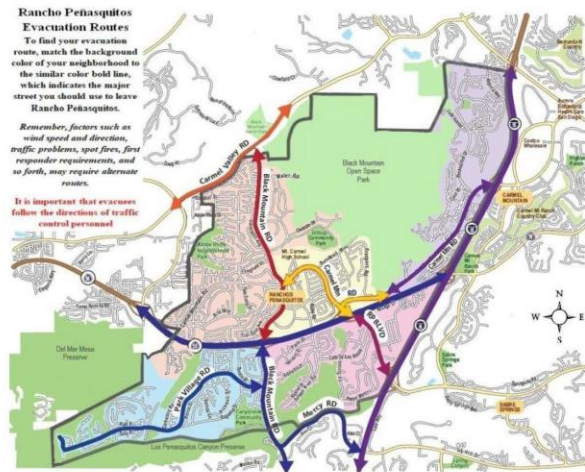
- Load your car.
  - Grab-and-Go Bags
  - Daily essentials: money, medicine, glasses, three-day supply of clothes
  - Pet crate, pet food
  - Valuables, pictures, computers, chargers
- Dress for evacuation and wear sturdy shoes.
- Close all windows and doors.
- Turn on all outside lights.
- Pull out and attach garden hoses.
- Close fireplace dampers.
- Shut off gas at the meter.
- Move lawn furniture away from your house.
- Move barbecue grill, lawnmower and other flammables away from your house.
- Review your Out-The-Door Checklist.
- Decide on your destination. Notify family members.
- Tune into 600 or 760 AM or any local TV station.
- Be alert for an emergency notification call.
- Apply your fire prevention gel, time permitting.

**IF YOU SEE OR SMELL SMOKE... GO!  
DON'T WAIT!**



COMMENTS

RESPONSES



**Quick Out-the-Door  
Checklist**

- ☐ 1. Check that all windows and doors are closed.
- ☐ 2. Purse, wallet, keys, cell phone.
- ☐ 3. Grab-and-go Bags, daily essentials.
- ☐ 4. Be sure the garage door is closed as you depart.
- ☐ 5. **GO!**

**After the Fire has Passed**

- Check outside and in the attic for embers.
- Continue to be alert for spot fires around the house for a full day.
- Notify security patrols that you are safe.

There will likely be post-fire security patrols to prevent residents from entering or re-entering the area.

**Important Phone Numbers**

Call 911 for All Emergencies  
Fire Information: 211 or on line at [@CALFIRESAN DIEGO](https://www.ready.sandiego.org/SDEmergencyApp/) or <http://www.ready.sandiego.org/SDEmergencyApp/>  
San Diego Police, non-emergency: (858) 484-3154  
San Diego County Sheriff: (858) 565-5200  
Department of Animal Services: 619-236-2341 (Emergency)  
SDGE Emergency Line: 1-800-611-7343

**If you Become Trapped**

**In Your Home:**

- Stay calm and keep your family together.
- Call 911 to advise officials.
- Fill sinks and tubs with cold water.
- Keep doors and windows closed.
- Remove curtains to avoid ignition by radiant heat.
- Move furniture away from windows.
- Stay inside, away from exterior walls and windows.
- Use wet towels to breathe through and to seal doors.
- Keep your fire extinguishers close by.

**In Your Car:**

- Stay calm and park away from vegetation.
- Call 911 to advise officials.
- Close all windows and vents.
- Cover mouth with dry cloth to protect airway.
- Cover yourself with a wool blanket or jacket.
- Lie on vehicle floor and stay in the car until the fire passes.

**On Foot:**

- Stay calm and find an area clear of vegetation, a ditch, or a depression on level ground.
- Call 911 to advise officials.
- Lie face down and cover up your body.
- Cover your mouth with a dry cloth to protect airway.

*This brochure was adapted from Evacuation Plans developed for the Scripps Ranch and Crest Fire Safe Councils. Thank You.  
Printed by San Diego Fire-Rescue Foundation*

*For changes, questions or comments, please contact the Rancho Peñasquitos Fire Safe Council, [pfiresafecouncil@gmail.com](mailto:pfiresafecouncil@gmail.com)*

## COMMENTS

## RESPONSES

**From:** [dpolitte@san.rr.com](mailto:dpolitte@san.rr.com)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Project Name: The Junipers Project No. 586670 / SCH No. 2018041032  
**Date:** Thursday, April 02, 2020 3:10:17 PM

Dear Ms. Osborn,

- SI39G-1 Please consider this e-mail as an official question about the above project's E.I.R. and please let me know that you have received this e-mail. In the below copied and pasted sections of the E.I.R. the Dudek 2019B report is relied on and cited frequently by the City of San Diego Development Services Department. I have previously identified that the Dudek report has several factual mistakes pertaining to the true identity of SDFD Deputy Chief Doug Perry reviewing and verifying the report. In the report it bases much of the
- SI39G-2 calculations on their mistaken belief that "Currently, the only viable evacuation route is Peñasquitos Drive to the south, which provides access to other primary evacuation routes (i.e., Carmel Mountain Road) that intersect with I-15 and SR-56 on-ramps. To the north of the project site, Andorra Way connects to Corte Raposo via an emergency vehicle access route that provides egress to Camino Del Norte and I-15, but is currently inaccessible." I have previously provided you photos of where Andorra Way connects to Corte Raposo proving that the bollards Dudek mentions in their report are not concreted in place and that the landscape / brush is not blocking the exit. Other information that is not correct in the Dudek report is that Cresta Bella has 368 units not 360 units. My question is why should anyone trust the lives of their family to Lennar Inc., City of San Diego Development Staff and Dudek? Are these not the same types of licensed, certified and qualified Engineer types of
- SI39G-3 individuals that work at the Federal Aviation Administration? As we now know, Boeing inc., like Lennar inc. is certainly capable of distorting their facts to suit their needs. I am sure the engineers who approved the Boeing 737 Max and the unsinkable Titanic were equally qualified to put lives at risk as the City of San Diego Development Services Staff. Personal past evacuation experiences ( in 2003 and in 2007 ) and common sense tells my neighbors and I that you should not add 600+ more units of housing at one intersection where all of the traffic needs to get onto 1-15 in an emergency evacuation. Doing so would only risk lives. Does anyone at the City of San Diego put Safety Before Development \$\$\$\$ these days?
- SI39G-4

Regards,

Dale Politte

- SI39G-1 Please refer to Response to Comment 1 of your communication of March 31 at 3:01 PM (comment letter SI39B) regarding Deputy Chief Perry and the fact that he was the correct and designated person to review and verify presentation data.
- SI39G-2 Please refer to Response to Comment 1 of your communication of March 31 at 7:01 PM (comment letter SI39C) addressing the variety of issues associated with the current Andorra Way/Corte Raposo connection and confirming the technical analysis that demonstrates that this connection is not currently available for emergency evacuation. Also within the March 31, 2:41 PM (comment letter SI39A) and April 1, 9:56 AM (comment letter SI39D) letters, please note Comments 4 and 2, respectively, which acknowledge the single existing egress, as well as associated responses. Relative to 360 versus 368 residential units at Cresta Bella, 368 units would result in an estimated additional 16 evacuating vehicles added to Carmel Mountain Road, which would move north or south along that roadway. Sixteen additional evacuating vehicles would not affect the findings of the Wildland Fire Evacuation Plan in a meaningful way. The project would lessen projected evacuation timeframes from approximately 8.3 hours following notification to approximately 3.5 hours. In addition, please note that as stated in note 2 to Table 2 of the Evacuation Plan, the number of vehicles evaluated for Junipers residents was conservative

## COMMENTS

## RESPONSES

	<p>SI39G-2 (cont.) (i.e., assumed more vehicles than would be likely). Please also refer to Response to Comment 1 of your communication of April 1, 9:56 AM (comment letter SI39D) for discussion of why the evacuation timeframe is shortened with project improvements.</p> <p>SI39G-3 This comment does not directly address the adequacy or accuracy of the analyses in the Draft EIR and does not require a response.</p> <p>SI39G-4 Please refer to Response to Comment 1 of your letter of April 1 (comment letter SI39D) for information as to the less than significant (and in fact beneficial) effect of the 536-residential unit project design with respect to the evacuation time for residents of the Glens community. Please also refer to the Response to Comment 2 of that letter regarding recent improvements in individual and united approaches between City, County and State agencies and investments in fire-fighting resources, which have improved fire-fighting and evacuation capabilities.</p>
--	--

## COMMENTS

## RESPONSES

11146 Amazon Street  
San Diego, CA 92129  
858-472-5080 (cell/text)

5.14.3 Impact 2: Fire Risk 2: Would the project expose people or structures to a significant risk of loss, injury, or death involving fire? Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The EIR shall discuss the human and public safety impacts from the potential fire hazards within and adjacent to the project. 5.14.3.1 Impact Thresholds Under the City threshold/Initial Study Checklist question, impacts related to fire risk would be significant if a project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. 5.14.3.2 Impact Analysis Because a portion of the project site is located within the VHFHSZ associated with the Black Mountain Open Space Preserve to the west, a Fire Protection Plan (FPP) was prepared for the project (Dudek 2019b; EIR Appendix K5). As demonstrated in the FPP, the project would be in compliance with applicable regulatory requirements pertaining to fire hazards and prevention, including Section 142.0412 (Brush Management) of the City Municipal Code and the 2016 CFC. The project would incorporate fire-related design elements such as fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and provision of adequate fire flow and emergency access. Fuel modification would be provided within the project boundaries and would involve removing flammable vegetation and ensuring that remaining vegetation does not have the ability

SI39G-5

SCH No. 2018041032; Project No. 586670 Section 5. 14 Draft Environmental Impact Report Health and Safety The Junipers Project City of San Diego 5. 14-16 February 2020 during construction. Therefore, no significant public safety impacts related to emergency services would occur during construction. Operation Fire Emergency Access The project would provide adequate emergency access within the site. Access for emergency vehicles would be provided at the main project entry along Peñasquitos Drive and along Carmel Mountain Road. Secondary access, for emergencies only, would be provided at Del Diablo Street where there is an existing curb cut and gated access. Internal roadways and a fire emergency lane within the project site would be provided per the City Fire Marshal's standards connecting the two site access points and extending along the entire perimeter of the site as well. (An off-site improvement to the north is also described in Section 3.0 and addressed below.) A roundabout would be provided along Peñasquitos Drive at Janal Way, as well as at three locations within the project site. Roundabouts allow for efficient emergency access and improve response times by eliminating or minimizing delays. A traffic signal would also be provided at the intersection of Peñasquitos Drive/Cuca Street/Hotel Karlan driveway. Additional emergency requirements, such as fire hydrants, fire hydrant markers (i.e., blue reflectors installed in the roadway), adequate vertical clearances, adequate turning radii, and fire ladder clearances, would be provided in accordance with City requirements. Proposed buildings would be constructed with fire-resistant construction materials and would include a protective system of fire sprinklers. Evacuation Because of its proximity to the VHFHSZ associated with the Black Mountain Open Space Park to the west, a Wildland Fire

SI39G-5 This "comment" is a compilation of selected excerpts from Section 5.14, *Health and Safety*, Sections 5.14.3 and 5.14.4 that is compiled into a running narrative. No comments were made other than to clip the passages together, and no response is required or possible.



## COMMENTS

## RESPONSES

SI39G-5  
cont.

Evacuation Plan was prepared for the project (EIR Appendix K4). As discussed in this evacuation plan, wildfire emergencies that would be most likely to require an evacuation of the project area would be either a large wildfire approaching from the Black Mountain Open Space Park which is west, northwest, and southwest of the project site, or a large wildfire approaching from the north/northeast with potential to spot into the project or the adjacent Black Mountain Open Space Park. Large wildfires are often wind driven and occur during declared Red Flag Warning days where low humidity and high winds facilitate fire ignition and spread. If a fire starts in the Black Mountain Open Space Park and is fanned by Santa Ana winds out of the northeast, the fire likely would tend to blow away from the project site toward the southwest, west or south. Local winds may result in fire that burns toward the site, but terrain does not support aggressive runs at the community, which is separated from the open space by developed areas. Fires occurring on typical (non-extreme) fire weather days, when humidity is higher and winds are not as high or gusty, have been very successfully controlled at small sizes within minutes of ignition and would not typically trigger a need to evacuate the project or surrounding area. Partial evacuation of some neighborhoods could be an option in these cases. Currently, the only viable evacuation route is Peñasquitos Drive to the south, which provides access to other primary evacuation routes (i.e., Carmel Mountain Road) that intersect with I-15 and SR-56 on-ramps. To the north of the project site, Andorra Way connects to Corte Raposo via an emergency vehicle access route that provides egress to Camino Del Norte and I-15, but is currently inaccessible. In the existing condition, the evacuation travel timeframe for the Glen's community is estimated at 8.3 hours once notification

## COMMENTS

## RESPONSES

**From:** [Jeanine Politte](#)  
**To:** [DSD FAS](#)  
**Cc:** [Jeanine Politte](#)  
**Subject:** [EXTERNAL] Draft EIR Comments: The Junipers / Project 586670  
**Date:** Monday, April 06, 2020 3:08:59 PM  
**Attachments:** [image001.gif](#)  
[image003.png](#)  
[Jeanine Politte Comments - The Junipers\\_586670.pdf](#)

Ms. Sara Osborn –

SI40-1

1. I am wondering why all concerns and suggestions expressed in my Scoping Meeting letter were not considered or addressed in the draft EIR for the Junipers Project? Additionally, my letter (see attached) was not included in the Draft EIR exhibits either. I have confirmation that it was received by the deadline. I am aware of other letters that were also not included. These concerns, even if duplicative, are just as important as those submitted at the actual scoping meeting on City printed forms. Each letter or form submitted shows the many neighbors who already live in this neighborhood, who experience daily life using existing infrastructure to go about their daily lives.

SI40-2

2. The existing residents are the ones who will be gravely impacted by the addition of more housing units... the traffic generated, delays of life saving public safety responses, and longer evacuation times when 1000+ vehicles jump to the front of the line and there are no City PD or Fire personnel opening or controlling the proposed emergency exits.

SI40-3

3. Fire Safety - It should be noted that there are no fire hydrants on the west side of Peñasquitos Drive south of Del Diablo Way. If there is another fire in Black Mtn. Open Space Park (near the water tower), SDFD fire apparatus will block off both sides of Peñasquitos Dr. to run their hoses across all lanes of traffic blocking all ingress/egress to a majority of the existing Glens residents.

SI40-4

4. Fire Safety, Evacuation Plan - Based on experience, reliance on emergency egress routes is problematic in that City or HOA resources may not be available to manage these routes. Additionally, conflicting information may cause these routes to not be available. Without the emergency routes, how long will it take residents from most northerly reach of the Glens neighborhood to reach Carmel Mtn. Rd? Were the number of registered vehicles in the neighborhood considered in calculations for evacuation times or just 1-2 vehicles per residential unit?

SI40-5

5. Alternative Projects were not sufficiently explored – current use is recreational, were other recreational uses or mixed use with a majority of the acreage used for recreation explored?

My response to the Draft EIR in no way supports the proposed Community Plan Amendment, Rezoning of the parcels, loss of our community's Open Space, the creation of more residential units on this open space or the proposed mitigations.

Please reply to confirm receipt of this message. Thank you.

Respectfully,

SI40-1

Comments noted. Your letter in response to the Notice of Preparation (NOP) was received and incidentally not included in the draft and this has been corrected. Please be assured that the issues raised in your Notice of Preparation response letter have been reviewed and that they were appropriately addressed in the Draft EIR, as discussed in Responses to Comments 6 through 30, below. While all public input is valued, for purposes of a CEQA EIR, if an appropriate issue is raised a single time, it will be addressed in the EIR. Criteria for inclusion do not include the number of times an issue was raised. All comments are being reviewed and considered.

SI40-2

Post-project traffic, delay in emergency response, and addition of project vehicles to evacuation times are not expected to impact the community. These issues are addressed in EIR Sections 5.2, *Transportation/Circulation*, and 5.14, *Health and Safety*. Section 5.2 addresses the effect of the project on both area roadway segments and intersections. Please also see Response to Comment 20 from Haight (Letter SI3) regarding road segments and intersections potentially affected by the project relative to daily operations. During emergency conditions, traffic directions and flows would be directed by emergency personnel.

Non-wildfire fire or police calls and response is addressed in EIR Section 5.13. No significant impact is identified. In case of wildfire, the evacuation options that would result as part of



## COMMENTS

## RESPONSES

	<p>SI40-2 (cont.) the project construction are identified in EIR Section 5.14. The projected Glens community emergency evacuation times would improve with implementation of the project. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>Regarding emergency personnel opening or controlling the proposed emergency exits, the SDFRD would be responsible for opening the gates. They may do this from on site, or also have capability to open the gates remotely. The exact design and operating system will be directed by the Fire-Rescue Department.</p> <p>Given the above considerations, the project would be expected to improve, rather than adversely impact, the existing condition.</p> <p>SI40-3 Comments noted. The project would comply with all requirements to install fire hydrants within the proposed development, and would not impact or require changes to existing off-site fire hydrants along Peñasquitos Drive or Carmel Mountain Road. The specific locations of off-site fire hydrants and specific response actions taken by emergency response professionals are beyond the purview of the project and do not address adequacy or accuracy of safety analyses in the EIR.</p> <p>SI40-4 Please refer to Response to Comment 4 from Collins (Letter SI13) regarding assurance of maintenance at the emergency egress between Corte Raposo and Andorra Way. The dual system of responsibility would ensure that maintenance would occur. The improved routes are relatively short in length prior to connecting with off-site paved and wider streets. The HOA would be able to provide the necessary</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI40-4 (cont.) quarterly vegetation maintenance during more substantial maintenance efforts on site along streets, in private parks, etc. It is noted that although responsibility has been assigned and would occur if necessary, once upgraded and installed, re-pavement of the egress routes is not expected to be required. Use would be restricted to emergency situations, which would keep use rates low (with associated low rates of wear).</p> <p>The emergency evacuation routes and features to facilitate these routes were developed in consultation with City transportation and fire officials. The reference to “conflicting information” is not understood, and no response can be provided. It is speculative to assume that City or HOA resources may not be available to support the evacuation, and the EIR is not required to include such speculative analysis. Relative to evacuation time without the emergency route upgrades, the existing condition is calculated to take approximately 8.3 hours from notification to evacuate. The EIR concludes in Section 5.14.4, that having the additional routes available would reduce evacuation time and therefore represents an improvement over existing conditions and would result in a less than significant impact.</p> <p>The analysis assumed evacuation of two vehicles per residence. Note that the number of assumed vehicles was originally fewer than two per residence and was increased at the request of the Rancho Peñasquitos Planning Board.</p> <p>SI40-5 The existing use is an abandoned golf course which originally provided a private recreational use, but has not operated since 2015. The current use of the former golf course site is not recreational. Please refer to Response to Comment 7 from DeLano (Letter SI1).</p>
--	--

## COMMENTS

## RESPONSES

Jeanine Politte  
11146 Alamazon St.  
San Diego, CA 92129

**From:** Jeanine@JPollitte.com [mailto:Jeanine@JPollitte.com]  
**Sent:** Thursday, May 10, 2018 12:05 PM  
**To:** 'dsdeas@sanidiego.gov'  
**Cc:** mdye@sanidiego.gov; 'mbrunette@sanidiego.gov'  
**Subject:** The Junipers / Project 586670 - Scoping Comments/Concerns

Hello Mr. Brunette and Mr. Dye,  
Attached please find my comments and concerns regarding the creation of the environmental impact report for the Junipers Project No. 586670.

Please reply to confirm receipt. Thank you.

Respectfully,

Jeanine Politte  
11146 Alamazon St  
San Diego, Ca 92129

Copy of attached document ///

ATTN: Mark Brunette, Senior Environmental Planner  
City of San Diego Development Services Department  
1222 First Avenue, MS 501  
San Diego, California 92101  
[DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

PROJECT NAME / NO. - The Junipers / 586670  
May 9, 2018

SI40-6

Our neighborhood was sold as a golf course community with additional recreational facilities (pool, fitness center, tennis courts, wood shop, craft/meeting rooms, kitchen) all located on approximately 121 acres. In 1985, the hotel was approved and we gave up some of those amenities, except the golf course and meeting room usage at the hotel as conditions of the commercial development agreement. The hotel had continued to provide a fitness center and pool until shutting them down in 2015 for renovations but remain closed today. The tennis courts have remained available but the proposed project will eliminate them.

SI40-7

keep the recreational vision of our forefathers, it would be nice to see an Alternative Proposal that offers open space and recreational facilities. Sometimes good development is no development at all – leave it as open space. I would prefer that the golf course property be left as open space per our current Community Plan and not be developed.

If development is inevitable, as some have said, I suggest keeping with the current zoning RS-1-14

SI40-6 Regarding evaluation of an open space/recreational scenario as an alternative, please refer to Response to Comment 3 from Haight (Letter SI3A). Please refer to Response 5 of this letter above regarding the golf course, and to Response to Comment 2 from Haight (Letter SI3A) regarding tennis courts. While the former Hotel Karlan did allow use of the tennis courts upon payment of fee, they did end use of the tennis courts. Other amenities mentioned (pool, fitness center, etc.) were not located on property transferred to the Junipers applicant, and are not relevant to analyses or accuracy of the EIR.

## COMMENTS

## RESPONSES

	<p>SI40-6 (cont.) The commenter's preference for an open space use on the site is noted. Regarding reasons to amend planning documents, as well as the loss of open space associated with the former golf course site, please also refer to the Response to Comment 7 from DeLano (Letter SI1).</p> <p>SI40-7 Please refer to the Response to Comment 3 from Haight (Letter SI3A) regarding development of the property in accordance with existing RS-1-14, and as evaluated in Section 8.0 under the heading "Existing Zoning Alternative." Please note that this alternative could result in the development of up to 831 residences (an additional 295 residential units) instead of the 536 age-restricted units associated with the project. The proposed zoning reserves portions of the site for open space and would limit development on the site to be a no more than the 536 units proposed by the project. Please refer to Response to Comment 16 from Haight (Letter SI3A).</p>
--	---

## COMMENTS

## RESPONSES

SI40-7 cont.	<p>which aligns with the majority of existing single family homes the project will abut; not the multi-family developments along Carmel Mtn. Rd. that include 2-4 story apartments blocks away.</p> <p>Issues/Concerns that I would like to see addressed in the EIR include:</p>	
SI40-8	<p>Health &amp; Safety -</p> <ol style="list-style-type: none"> <li>1. Fire Safety – The additional traffic generated by new homes will block existing residents from evacuating the neighborhood in a fire situation.</li> <li>a. An Evacuation Plan is needed for the whole community and not just a list of things we can do to make our homes more fire safe as was previously suggested by the project developer. Costs may be prohibitive to many homeowners with limited incomes. Plan should also include how the school will be evacuated if during the school day.</li> </ol>	SI40-8 The Wildland Fire Evacuation Plan (EIR Appendix K4) was prepared in response to community voiced concern regarding evacuation. Please refer to Response to Comment 1 from Derbique (Letter SI4) regarding improved evacuation options that would occur if the project is implemented.
SI40-9	<ol style="list-style-type: none"> <li>b. The community's current secondary Fire Exit has always caused confusion and access. SDPD &amp; SDFD need to be on the same page, residents need to be informed about when it will be opened and by whom. It needs to be usable by fire trucks, fire engines, ladder trucks, and buses and residents vehicles/trucks/etc. Currently, cutting the locks and removing the bollards may be the fastest way out if you have a bolt cutter and can move the posts out of the way. Maintenance of the current exit is also lacking so who will maintain any improvements?</li> </ol>	SI40-9 Each of these issues is addressed in Section 5.14 of the EIR. See also EIR Appendix K4 and the Response to Comment 1, above. The SDFRD provided input into the Evacuation Plan.
SI40-10	<ol style="list-style-type: none"> <li>2. Impacts to response times for SDFD and Paramedics.</li> </ol>	SI40-10 Fire and police response times are addressed in EIR Section 5.13, <i>Public Services and Facilities/Recreation</i> . Less than significant impacts would occur.
SI40-11	<p>Are there steep slopes and environmentally sensitive areas that will limit the development of portions of the property and if so, will they be placed into a conservation easement to restrict further encroachment into the environmentally sensitive areas?</p>	SI40-11 The issue of environmentally sensitive lands (steep slopes, native habitat, cultural resources, etc.) is addressed in Sections 5.1, <i>Land Use</i> , 5.8, <i>Biological Resources</i> , and 5.11, <i>Historical and Tribal Cultural Resources</i> . These resources were not identified on the site, and no conservation easement is necessary. Nonetheless, an open space corridor has been placed around the site perimeter, where the steepest slopes exist, and that area is zoned for open space.
SI40-12	<p>Noise related to the highway and proposed High Speed Rail. We can hear the highway at our home especially during the night and we live blocks away and down in the basin near the elementary school. I can only imagine how loud it is on the property nearest I-15 with the many semi-trucks and as a friend used to call them, all the "Ricky Racers" racing on the highway.</p> <p>Additionally, if the High Speed Rail actually gets built along the proposed route, the Junipers should mitigate for the worst case noise scenario of trains going 220 mph with steel wheels on elevated steel tracks. At a minimum they will need to inform potential buyers of the proposed rail system.</p>	SI40-12 The issue of I-15 noise and its potential impacts on the project is addressed through noise barriers and architectural enhancements as addressed in Section 3.0, <i>Project Description</i> , and 5.1, <i>Land Use</i> .
SI40-13	<p>Upon closing down the golf course, the owners had the greens and water features removed as well as demolishing the maintenance and out buildings. My concern is that over the years, fertilizers and other chemicals were stored in the buildings and as a golf course, fertilizers were over used to keep the greens and fairways in top condition. I have read a few articles about "Brown Field" conditions existing on golf courses and would like to be assured that extensive studies are conducted across the whole golf course to eliminate those concerns and if found to be an issue, remediated.</p>	
SI40-14	<p>Circulation, Roads, Traffic, Ingress/Egress Issues –</p> <ol style="list-style-type: none"> <li>1. Can Penasquitos Drive and Carmel Mtn. Rd. handle the additional traffic without degradation to level of service?</li> <li>2. Carmel Mtn. Rd. proposed ingress/egress into the Junipers – Adding another or extending the existing right-turn lane into the new development between I-15 ramp and Penasquitos</li> </ol>	Relative to high-speed rail, the Los Angeles to San Diego portion is Phase 2 of the state-wide program. This is not proposed as part of the project, however, and the EIR does

## COMMENTS

## RESPONSES

	<p>SI40-12 (cont.) not model what is not designed or funded for implementation. As such, the potential effect of it is speculative at this time. In any event, environmental evaluation of the rail would occur in the future as part of those environmental studies.</p> <p>SI40-13 The issue of fertilizers and other hazardous materials potentially on site is addressed in EIR Section 5.14.2, <i>Impact 1: Health Hazards</i>, as well as in the detailed EIR Appendices K1, K2, and K3 (Phase I Environmental Site Assessment, Carmel Highland Golf Course; Phase I Environmental Site Assessment, Vacant Land, Unassigned Address; and Asbestos and Lead-Based Paint Investigation, respectively). In brief, as stated in Section 5.14.2.3, "there are no listed hazardous materials sites on the project site or in the vicinity that could pose a threat to human health or safety." It is also noted that testing for pesticides, etc. in on-site soils did not identify significant impacts. Potential for asbestos-lined pipes was considered most likely, if present, to be associated with the main drain/sewer from the golf course. As a result, mitigation measure HAZ-1 requires a soil management plan (SMP) for use during construction to ensure that if contaminated material is located during construction, such soils would be appropriately treated. As stated in EIR Section 5.14.2, with this specified construction requirement as mitigation, impacts would be less than significant.</p> <p>SI40-14 This issue is addressed in EIR Section 5.2. Please also refer to Response to Comment 2, above, regarding Peñasquitos Drive and Carmel Mountain Road street segments. The right-turn in only entrance to the project from Carmel Mountain Road is addressed in Section 3.0, and is depicted on Figure 3-12d. Daily drivers would not be able to exit the project onto Carmel Mountain Road from that entrance; they would be blocked by the gate from exiting via that route.</p>
--	--

## COMMENTS

## RESPONSES

SI40-14 cont.	Drive will be a nightmare if users exit and cross 3 lanes of traffic to reach the left-turn lane and head back to I-15. Emergency Only exit will be no different. Speeds on Carmel Mtn. Rd. coming off the bridge are 40-55 mph to beat the lights. There aren't enough SDPD officers to monitor traffic and one accident will be too many.	
SI40-15	<p>a. Will the cut-through road add a new pinch point at Janal Way on Penasquitos Drive for existing residents?</p> <p>b. If this ingress is utilized, what impacts to local traffic would it cause or eliminate if this road winds through the development before it connects to Penasquitos Drive?</p> <p>c. Will it improve traffic on Penasquitos Drive between Carmel Mtn. Rd and Janal Way?</p>	SI40-15 The benefits provided by the roundabout at Peñasquitos Drive/Janal Way/Future Project Access are addressed in Section 5.2 of the EIR. Please also refer to the Response to Comment 20 from Haight (Letter SI3A). Roundabouts are designed to create smoother traffic flow rather than result in a pinch point. Please also see Response to Comment 2, above, regarding existing and future LOS. Section 5.2 of the EIR also addresses the segment of Peñasquitos Drive between Janal Way and Carmel Mountain Road intersections (no reduction in LOS). The roundabout also would support entering and/or cross traffic (vehicular, pedestrian and bicycle) at this intersection (which currently has a stop sign only for vehicles approaching the intersection from Janal Way).
SI40-16	3. Penasquitos Drive – Residents of Cresta Bella and parishioners will take more risks crossing east bound traffic to get into the apartments and the church. Hotel guests will have to cross more neighborhood traffic to get out of the parking lot.	
SI40-17	4. Janal Way – new impacts to existing residences at and near the controlled intersection.	
SI40-18	5. Look for an alternate location to access or connect from the proposed project like a bridge over I-15 to the Margaret Sellers Postal Distribution Center.	
SI40-19	6. Comprehensive traffic studies should include Carmel Mtn. Rd. from Rancho Carmel Drive to at least Cuca St. and along Penasquitos Drive from Penasquitos Plaza shopping center to at least Penasquitos Court. It would also be good to know how many traffic accidents have occurred in the study area and the types of traffic citations written (by location) for the past 10 years. All proposed and approved housing and commercial projects should be included in the traffic study as well as the impacts from the proposed High Speed Rail project route and realignment of existing roads along I-15 from Rancho Bernardo south to Poway Rd./Rancho Penasquitos Blvd.	
SI40-20	<p>Utilities –</p> <p>1. Sewer capacity and connections into existing sewer line along Penasquitos Drive. Homeowners who reside downhill from the Janal Way intersection have lived with sewer backup, gas and smells into their homes. A few years ago, the City realigned multiple connections along Penasquitos Drive to remedy this long standing issue. Is there capacity available to add more residential units and not impact existing residents?</p>	SI40-16 The Lutheran Church is located at the Peñasquitos Drive/Cuca Street intersection. The issue of pedestrian crossings at this intersection would be improved by the proposed signalization of this intersection as mitigation for the project. Please refer to the Response to Comment 2, above.
SI40-21	2. Landscaping and or common area watering – feasibility of drilling a well for HOA and open space use?	
SI40-22	3. SDGE existing high capacity natural gas line and easement located on the project property. We do not want to be another San Bruno. Since the CPUC judge's proposed decision was released last week, it could be that SDGE's proposed new natural gas pipeline project may never be built. So the existing main pipeline will remain in an easement as a high capacity pipeline alongside homes existing home and potentially new attached homes. Have they provided safety records for the existing pipeline? I'd like to see additional info requested from SDGE about what types of service/testing they will need to complete in the area to keep the existing pipeline repaired and operating at capacity without problems. What mediation will be required by SDG&E if the Junipers project (in any form) is approved?	SI40-17 The roundabout would be constructed entirely within public right-of-way or on the project site (see EIR Figures 3-12e and f). As shown, all improvements would be constructed within areas that are either already in roadway or within an area to be dedicated as public right-of-way within the project. Impacts to off-site private properties at the intersection would not occur.
SI40-23	4. Is it possible to move access to the existing utility easements from the Del Diablo Street maintenance road to inside the new development?	
SI40-24	Biological Resources – Since the naturalization of the property commenced 2 years ago, local wildlife have increased and travel freely along the corridor and into our neighborhoods. The property has	



## COMMENTS

## RESPONSES

	<p>SI40-17 (cont.) The EIR is only required to address and mitigate significant effects of the proposed project. Refer to Response to Comment 2 from Birdsall (Letter SI8A), for additional information regarding proposed emergency evacuation and access improvements.</p> <p>SI40-18 The EIR is only required to address and mitigate significant effects of the proposed project. Please refer to Response to Comment 2 from Birdsall (Letter SI8A).</p> <p>SI40-19 The transportation/circulation study area is defined in accordance with the City Traffic Impact Study Manual. As described in Section 5.2.1.1, <i>Environmental Setting</i>, this requires that a project address:</p> <ul style="list-style-type: none"> <li>• <i>All adjacent intersections plus the first major signalized intersection in each direction of the site;</i></li> <li>• <i>Regionally important arterial road segments and intersections where the project would add 50 or more peak hour trips in either direction;</i></li> <li>• <i>All mainline freeway locations, and on/off ramp intersections where the project would add 50 or more peak hour trips in either direction; and</i></li> <li>• <i>Metered freeway ramps where the project would add 20 or more peak hour trips.</i></li> </ul> <p><i>In addition, per the guidelines, all known congested or potentially congested locations that may be impacted by the proposed development were included. To be conservative, several intersections were included in the TIA that would not meet the 50 peak hour trips guideline.</i></p>
--	---

## COMMENTS

## RESPONSES

	<p>SI40-19 (cont.) The study area locations reflect the project trip distribution analysis provided in the Transportation Impact Analysis (TIA) and summarized in EIR Section 5.2.2, and represent the most likely locations to be impacted by project traffic. As a result, the project study area includes 11 intersections and 8 street segments as depicted on Figure 5.2-1.</p> <p>Inclusion of historic traffic accident data was not required in the EIR as the project is not required to address historic traffic safety issues. The EIR does address safety of proposed project improvements in Section 5.2.3, <i>Impact 2: Potential for Traffic Hazards</i>. The cumulative projects included in the analyses were identified based on location, type, and whether they were known at the time of setting the baseline conditions for environmental review (issuance of the project Notice of Preparation [NOP] of the EIR in April 2018). This included Pacific Village, Merge 56, and the Preserve at Torrey Highlands. Please refer to Response to Comment 12, above, regarding the speculative nature of high-speed rail in the I-15 corridor. It is not appropriate to include in the cumulative project analyses.</p> <p>SI40-20 Sewer capacity is addressed in EIR Section 5.12.2, <i>Impact 1: Potential Increased Demand on Utilities</i>, and a Sewer System Analysis is provided in Appendix J3. Addition of the project would be accommodated within existing flow capacity.</p> <p>SI40-21 The project does not propose a well for landscaping, which could result in contributions to groundwater depletion. The project is providing for use of recycled water when available, and in the meantime, is proposing a drought-tolerant palette of plants, including natives, and would use drip irrigation, low-flow sprinkler heads, and automatic weather-sensitive controllers in irrigation systems to reduce water usage.</p>
--	--

## COMMENTS

## RESPONSES

	<p>SI40-21 (cont.) Please refer to EIR Section 3.3.1.7, <i>Landscaping</i>.</p> <p>SI40-22 EIR Section 3.4, <i>SDG&amp;E Facilities Modification</i>, and Figure 3-17 address SDG&amp;E gas main retained location and relocation to paved streets within the site. The modified facilities would be completed in accordance with SDG&amp;E policies and in conjunction with SDG&amp;E. Specifics as to their technical testing or service protocols for facilities within their jurisdiction would not change from their overall system protocols, and as such, constitute existing conditions and are not part of the EIR. Avoidance of existing lines to be retained in place, and the required coordination during construction, is addressed in Section 5.12.2, <i>Impact 1: Potential Increased Demand on Utilities</i>, under the heading "SDG&amp;E Facilities." The query as to "mediation...required by SDG&amp;E if the project (in any form) is approved" is not understood. If it refers to actions taken, please see EIR Section 3.4. SDG&amp;E will be consulted and involved in all work affecting its facilities during project construction and will retain easements for the ongoing maintenance of its facilities.</p> <p>SI40-23 Please refer to Response to Comment 22, above, regarding depiction of SDG&amp;E facilities on Figure 3-17. The utilities that cross Del Diablo Street will be preserved in place and Del Diablo Street will be retained for both utility access and emergency fire access purposes.</p> <p>SI40-24 EIR Section 5.8.3, <i>Impact 2: Wildlife Corridors</i>, specifically addresses the issue of designated wildlife corridors, and discloses that the project site does not occur within an identified or known wildlife corridor or linkage. It is acknowledged that predators such as coyote are comfortable living in proximity to development, and that they can inhabit areas with dense brush.</p>
--	---

## COMMENTS

## RESPONSES

SI40-24 cont. become a corridor and feeding ground for predators.

If any form of redevelopment is approved, can the following conditions be added to the permits and would the developer agree to them?

SI40-25 1. All open space, trail loops, parks provided with the development to be dedicated and/or held in conservancy so it can never be developed whether accepted by the City Parks and Rec Dept. or maintained/owned by an HOA.

SI40-26 a. Will a CUP be required to keep public use of the facilities available in perpetuity?

SI40-27 2. Make the Maintenance access road on Del Diablo Street a walkway only. Utilities would need to access the easements through the new development.

SI40-28 3. No use of Maintenance access road to property from Del Diablo St. or driveway north of tennis courts on Penasquitos Drive, or any other entrance via existing residential streets) into new development for construction vehicles/equipment or employees/construction workers.

SI40-29 4. Limit the hours that trucks, equipment, building supplies, etc. may be delivered to the site and exclude high traffic hours on Carmel Mtn. Rd. and Penasquitos Drive to reduce impacts on community.

SI40-30 5. Construction Parking – restrict to onsite only. No parking allowed in existing neighborhoods.

Thank you for this consideration.  
Respectfully,

Jeanine Politte  
11146 Almazon St.  
San Diego, CA 92129  
///

SI40-24 (cont.) Please also see Response to Comment 2 from McClelland (Letter SI31) regarding wildlife linkages.

SI40-25 Revised zoning (OR-1-1 and OP-1-1) to specifically “protect lands for outdoor recreation, education, and scenic and visual enjoyment” are identified in EIR Section 3.0. In addition, EIR Section 3.0 addresses the Community Plan Implementation Overlay Zone (CPIOZ) proposed by the project, which would require additional review for consistency with the adopted plan if the project PDP is not realized. Please refer to Response to Comment 16 from Haight (Letter SI3A).

SI40-26 The proposed uses on the project site are permissible without the approval of a Conditional Use Permit (CUP); no CUP is therefore allowed or proposed.

SI40-27 The access easement to Del Diablo Street would be improved to provide emergency egress as well as support pedestrian and bike access to the site loop trail. The connection is shown on EIR Figure 3-1. Del Diablo street would also continue to serve as access to the utilities easement that crosses Del Diablo.

SI40-28 Use of City Circulation Element roads (including Carmel Mountain Road and Peñasquitos Drive) is discussed in EIR Section 3.3.2, *Construction*, and also addresses lack of need to use residential streets and the construction traffic control plans (TCPs) that would be implemented and the need to provide public liaison/contact information for public inquiries/concerns. The TCPs would identify truck routes, the hours of construction activity, work zones, staging areas, and other traffic controls as necessary. The plan would include measures to reduce traffic delays and minimize public safety impacts, such as the use of flaggers, traffic

## COMMENTS

## RESPONSES

	<p>SI40-28 (cont.) cones, detours and advanced notification signage, pedestrian detours, movement restrictions and temporary lane closures to minimize traffic delays during construction.</p> <p>SI40-29 Construction activity time periods are addressed in EIR Section 3.3.2. Please see Response to Comment 28 regarding the TCPs.</p> <p>SI40-30 A construction staging plan will be prepared by the building contractor at the time of construction permits.</p>
--	--

## COMMENTS

## RESPONSES

**From:** [Elaine Wilson](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** [EXTERNAL] Comments to EIR for Junipers Project No. 586670  
**Date:** Monday, April 06, 2020 4:09:04 PM

Following are my comments to the EIR for Junipers Project No. 586670

SI41-1 1. 2.4.4 "Zoning". In the zoning for the property dating back to 1962, the CUP identifies the intended use as a golf course. I do not see any reference to a change in the zoning, yet it is now being shown as residential. Please review and let us know if a change in zoning was ever done.

SI41-2 2. Figure 3-12g "Penasquitos Drive-Cuca Street Intersection Improvements" Since the Draft EIR was completed before the Millennium PQ project was brought to light in December 2019, the traffic study that was completed is no longer valid. Request that a new traffic study is done before any approval is made for the traffic plan.

Sincerely,

Elaine Wilson  
 10951 Guadalupe Way  
 San Diego, CA 92129  
 (858) 603-6997

SI41-1 A Conditional Use Permit allows a special use to occur on a property and specifies the terms for that use. It does not require that use to continue in perpetuity and it does not alter the underlying zoning. The proposed project would rescind the existing CUP, as specified in Table 3-2, *Discretionary Actions Required*, and change the existing underlying RS-1-14 zone to RM-1-1 and RM-3-7 residential zones and OR-1-1 and OP-1-1 open space zones. The purpose of the zone change is primarily to reduce the maximum allowable density for the project site to be closer to the proposed project density. Please refer to Response to Comment 3 from Haight (Letter SI3A) for additional information.

SI41-2 Regarding the potential Millennium PQ project, please note that the project EIR addressed cumulative projects that were known at the time that the project Notice of Preparation was issued in April 2018. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.

## COMMENTS

## RESPONSES

**From:** [Danny Redfern](#)  
**To:** [DSD EAS](#)  
**Subject:** [EXTERNAL] Project Name: The JuniperProject No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 9:52:02 PM

Dear Sara,

I have some concerns about the proposed project in Rancho Penasquitos. Logically it makes no sense but I would appreciate your feedback with my questions:

**Page 108 Section 5.2-25 Significance of Traffic Impact** (this section discusses the addition of the proposed roundabout and traffic signal to PQ Drive to mitigate traffic). Diagrams available on [pages 12 & 14](#).

SI42-1 How will this ease traffic? Traffic will already be worse because of the Pacific Village that is being developed on Carmel Mountain road. There is only one way out of the rolling hills neighborhood so everyone is leaving at the same time to head to work in the morning. Also, does this take inconsideration that the hotel karlan will no longer be a hotel and it will potentially be even more residential units?

**Page 209 Section 5.13.2.3 Fire and Life Protection**

SI42-2 Only one way in and one way out is a disaster in the making and we want to add more people to that? Since there is only one way in an out and now there will be more life how come a new fire station will not be considered?

**Page 234 Section 6.2.2 Transportation/Circulation**

SI42-3 How is any delay acceptable? There is a theme here that I don't feel is being truly addressed. Are there any other neighborhoods in n San Diego with those density and only one way and one way out? If so I would be curious to find out their thoughts if they were to add in to their neighborhood. When traffic does become an issue how will the city accommodate our needs?

**Page 225 Section 5.14.3 Impact 2: Fire Risk** (impact may NOT be "less than significant," per independent analysis)

SI42-4 Any impact should be considered significant. Example would be the camp fire that happened in Northern California. This relates to back to only a single way in and out of the neighborhood. Why even risk it?

**Page 226 Section 5.14.4 Impact 3: Emergency Response**  
 (proposed additional exit routes from community may not be viable)

SI42-5

SI42-1 Please refer to the Response to Comment 20 from Haight (Letter SI3A) for detailed information regarding traffic signal and roundabout operations. EIR Tables 5.2-7, 5.2-9, 5.2-12 and 5.2-13 specifically address expected project impacts to both Peñasquitos Drive intersections, including the proposed project, as well as Pacific Village, Merge 56, and the Preserve at Torrey Highlands, in both Opening Day (2020) Plus Project (Near-term) and Horizon Year (2050) Plus Project conditions, prior to and post mitigation. As shown on EIR Tables 5.2-7 and 5.2-9, both of the noted Peñasquitos Drive intersections would operate at Level of Service (LOS) A with project mitigation, in either the Near-term or Horizon Year condition, which is the least congested LOS. The potential future development of the former Hotel Karlan site was not a known cumulative project at the time of the proposed project Notice of Preparation in April 2018; please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information.

SI42-2 Please refer to EIR Section 5.13, *Public Services and Facilities/ Recreation*. As stated in Section 5.13.2.3, and specifically related to fire and life protection, Station 42 would be able to access the most distant resident in the development within City response goals, and "no new facilities or improvements to existing facilities would be required as a result of the project."



## COMMENTS

## RESPONSES

	<p>SI42-2 (cont.) As such, no new fire station is needed. Relative to the neighborhood having only “one way in and out,” the project did also specifically address that in EIR Section 5.14, <i>Health and Safety</i>, which summarizes results of the Wildland Fire Evacuation Plan (Appendix 4K to the EIR). Please refer to the Response to Comment 1 from Derby (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan. With project implementation, two additional evacuation routes would be available to Glens residents and the time required to evacuate would be reduced compared to the existing condition without the project; therefore, the project would provide a fire safety benefit.</p> <p>SI42-3 The significance thresholds of one second of delay if the intersection is LOS F and two seconds of delay if the intersection is LOS E are reasonable and are applied to all CEQA analyses within the City. Relative to “other neighborhoods,” the project analyses are focused on the proposed project and immediately surrounding community. Environmental issues vary based on project locational specifics, and as such, other neighborhoods are not relevant to the analyses. Project traffic studies project future conditions to 2050, a period of time 30 years out. Should changed conditions result in traffic becoming an issue beyond this time frame, or due to other projects in the area, it is assumed that those conditions and any necessary improvements, would be addressed by new planned developments as appropriate and mitigation would be required for significant impacts. Regardless, such potential future conditions are speculative and are not associated with the current project, and therefore do not address the adequacy or accuracy of analyses in the Draft EIR. As such, no additional response is required.</p>
--	--

## COMMENTS

## RESPONSES

SI42-4 Pursuant to CEQA Guidelines Section 15125(a), an EIR measures the impacts of a proposed project against a “baseline” of environmental conditions at and in the vicinity of the project site. Because the proposed project would improve the existing condition by providing additional evacuation route options, no significant adverse effect, or impact, has been identified. Please refer to the Response to Comment 2, above, and the Response to Comment 1 from Derbique (Letter SI4), which details improvements to emergency evacuation options and timing that would result with project implementation. With project implementation, there would no longer be “only a single way in and out.”

Fire modeling was conducted regarding the type and intensity of fire that could be expected given specific characteristic site features such as topography, vegetation, and weather. Please refer to EIR Appendix K5, the Fire Protection Plan, Section 4. Anticipated Fire Behavior Modeling, for detail.

SI42-5 All described project improvements are feasible and can be implemented. The statement that “proposed additional exit routes from community may not be viable” is not expanded upon, and no reason for this opinion is given. As such, it is not possible to provide any more direct response. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements (i.e., “one way in and one way out”). The remainder of the comment consists of urban area comparison and does not address the adequacy or accuracy of analyses in the Draft EIR. No response is required.

## COMMENTS

## RESPONSES

SI42-5 cont.	I don't know how many times this needs to be reiterated, one way in and one way out. No matter how many studies are being done or proposed, adding more density into a dense place is not a good idea. What we love about San Diego is that it isn't Los Angeles. Why go forward with this? If the proposed exit routes are not viable, why risk the safety of the residents? The existing additional fire route is locked and not a maintained road. How will emergency crews be able to reach that fire road in time to unlock the gates or is it the resident responsibility to open it on their own?	SI42-6 Please refer to the Response to Comment 1 from Derbique (Letter SI4) regarding improvements to the existing access route that would occur with the project. Bollards and gates would be functional and the routes would be repaved.
SI42-6		
SI42-7	I appreciate your time and hope you hear the concerns of the existing residents of PQ. If you have any questions for myself please don't hesitate.  Concerned citizen,  Daniel Redfern Ajanta Court	Residents would not be responsible for opening gates. That would be the responsibility of the Fire Department. They may do this from on site, but would also have capability to open the gates remotely. The exact design and operating system will be directed by the Fire Department.
		SI42-7 Comment noted. This comment does not address the adequacy or accuracy of analyses in the Draft EIR, and no response is required.

## COMMENTS

## RESPONSES

**From:** [Tara Selhorn](#)  
**To:** [DSD EAS](#)  
**Subject:** [EXTERNAL] Public Comment on Junipers Project  
**Date:** Monday, April 06, 2020 9:47:32 PM

Hello-

I have reviewed the EIR of the Junipers Project to be built in the NW part of Penasquitos.

SI43-1

Section 6.2.2- Transportation and Circulation- Intersections #6, #7, #10 and #11 do not have proper mitigation for the LOS E and F ratings. A traffic circle that feeds into a stop light that leads to another stop light all within say 1/2 of a mile of each other is excessive for all residents to try and leave their homes at rush hour. Propose lower density development to lessen impact to the infrastructure or propose the fire emergency exit at Andorra way be opened and expanded for regular traffic, which would mitigate traffic towards the Carmel Mountain Road side of the neighborhood.

SI43-2

SI43-3

Figure 3-12c- Carmel Mountain Frontage and Off-Site Conceptual Improvements- Calls for a deceleration lane for traffic to the new entrance to the Juniper community. There is not a very long runway before approaching the Penasquitos Drive/ Carmel Mountain intersection, in which the right turn lane for that gets backed up at rush hour. No indication of the impact on existing traffic patterns or potential hazard/interference with the existing turning traffic that is just past this proposed new entrance.

SI43-4

Another item that I noted is that I did not see that in this EIR any incorporation of the existing Lennar project that is under construction on the SW side of Carmel Mountain Road and that anticipated impact to the existing traffic patterns on Carmel Mountain Road, especially the freeway entrance and traffic related to that in the peak rush hours.

Thank you,  
Tara Selhorn

SI43-1 As described for the project in EIR Section 6.2.2:

*The increase in delay at Intersections #1, #10, and #11 would not exceed the acceptable delay thresholds and impacts would not be cumulatively significant; however, delay increases at intersections #6 and #7 would exceed acceptable delay thresholds and mitigation measures would be required. Specifically, cumulative intersection impacts would result at intersection #6 (Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway) and intersection #7 (Peñasquitos Drive/Janal Way/Future Project Access) as the project would contribute more than 1.0 second of delay at two intersections that would each operate at LOS F. Mitigation measures for intersections #6 and #7 are identified as TRA-1 and TRA 2.*

As detailed in Tables 5.2-7, *Near-Term Intersection Operations*, and 5.2-9, *Horizon Year Intersection Operations*, in Section 5.2, *Transportation/Circulation*, the project would contribute less than one second of delay to intersections 10 and 11 during the AM and PM peak hours. As depicted in Table 5.2-3, *Traffic Impact Significance Thresholds*, a significant impact would occur if the project would add 2.0 seconds of delay to an intersection with Level of Service (LOS) E or 1.0 second of delay to an intersection with LOS F. Therefore, as noted in Section 6.2.2, the project would not result in significant impacts at intersections 10 and 11, and mitigation is neither required nor proposed.

## COMMENTS

## RESPONSES

	<p>SI43-1 (cont.) Mitigation at intersections 6 and 7 would improve post-project intersection function to LOS A, the least congested condition. The LOS at these intersections, as well as that at Carmel Mountain Road and Peñasquitos Drive and the associated roadway segments reflect that the improvements would work well within the local roadway system.</p> <p>SI43-2 Please refer to Response to Comment 1, above. As discussed, project traffic would not result in a significant impact to intersections 10 and 11. Also as described, project-related significant contributions to traffic at intersections 6 and 7 would be mitigated, with project-implemented improvements maintaining LOS A at both intersections through community buildout Horizon Year 2050. As such, additional mitigation is not required, including opening Andorra Drive to daily traffic.</p> <p>A lesser intensity alternative is addressed in Section 8.4.3, <i>Reduced Intensity Development Alternative</i>, which addresses an alternative scenario with 25 percent fewer homes.</p> <p>SI43-3 An evaluation of this project entrance and the approach along Carmel Mountain Road is provided in Section 5.2.3.2, <i>Impact 2: Potential for Traffic Hazards</i>; which addresses the design of the deceleration lane/right-turn lane relative to the Highway Design Manual (2018). As shown on Figure 3-12c, the deceleration lane on Carmel Mountain Road would extend from I-15 to the new project entry. As such, it would not directly attach to the Carmel Mountain Road/Peñasquitos Drive intersection. The section of Carmel Mountain Road between I-15 and Peñasquitos Drive is built as two lanes in the westerly direction, and that would not be affected by the project. The deceleration lane would be additional to those two lanes, and the dedicated right-turn lane at the intersection with Peñasquitos Drive would be retained.</p>
--	---

## COMMENTS

## RESPONSES

- SI43-3 (cont.) Project modeling reflects anticipated traffic volumes on Carmel Mountain Road, including the intersection with Peñasquitos Drive, under both the Opening Day (2020; Near-term) and Horizon Year (2050) conditions. The Carmel Mountain Road/Peñasquitos Drive intersection is projected to operate at acceptable LOS C in both the AM and PM peak hours in both the Near-term and Horizon Year (see EIR Tables 5.2-7 and 5.2-9). The right turns into the project site from Carmel Mountain Road would be free-flowing and would travel in a deceleration lane separate from the vehicles approaching the Carmel Mountain Road/Peñasquitos Drive intersection.
- SI43-4 The Lennar project that is building out south of Carmel Mountain Road is Pacific Village. That project was included in the Near-term and Horizon Year (2050) traffic analyses summarized in Tables 5.2-7 through 5.2-13 in Section 5.2. Within these tables, please refer to intersections 2 and 3, which address the north- and southbound I-15 on-ramps from Carmel Mountain Road. Each of the intersection tables addresses commuter peak hour traffic, which reflects rush hour.

## COMMENTS

## RESPONSES

**From:** [Lin Siepert](#)  
**To:** [DSD FAS](#)  
**Subject:** [EXTERNAL] Project name: Th Junipers, Project #586670/SCH No. 20180041032  
**Date:** Monday, April 06, 2020 2:34:44 PM

Sara Osborn,

As a very concerned and worried resident of Rancho Penasquitos I am writing to you to please consider the following. My husband and I have lived here for 23 years and have seen a lot of new housing in the area but it time to put the brakes on development and keep Rancho Penasquitos a safe place to live and bring up a family.

I draw your attention to the following items.

- SI44-1 1. Page 108 Section 5.2-25, Significance of Traffic Impact.  
 Why are there plans to place roundabouts on Penasquitos Drive? Fire officials have said there is not enough room for the use fire trucks!
- SI44-2 2. Page 209 Section 5.13.2.3 Fire and Life Protection.  
 In recent fire evacuations the traffic getting onto I-15 has been a challenge and now you would add several hundred more cars to the mix. The notion of a surgical evacuation is nonsense. There will be no one monitoring such and effort and I expect we all will leave the very moment we feel it necessary. How can you allow the developers to say, and you endorse such nonsense? Evacuations from approaching fires is high on the worry list of all people in San Diego and have you considered that we have two elementary schools that will need to be evacuated? Please, please stop and consider how you would feel if you or any family lived here. This development is not right for this community, we have grown hugely with the development of Lennar on Carmel Mountain Road. It's time to stop adding to our density and keep us safe.
- Thank you for your time.  
 Linda Siepert  
 14555 Yukon Street  
 San Diego, Ca  
 92129  
 Home 858-672-7831  
 Cell 760-315-3338

SI44-1 A single roundabout is proposed for the Peñasquitos Drive/Janal Way/Future Project Access intersection. The roundabout would be constructed in compliance with all design requirements, including design to accommodate fire trucks. Refer to the Response to Comment 20 from Haight A (Letter SI3A) for detailed information regarding traffic signal and roundabout operations. Please see Figure 3-12e of the EIR, which depicts the roundabout. As shown, the project would dedicate right-of-way for the roundabout. Also as shown, the circle in the roundabout would accommodate emergency vehicle access (fire truck apron) through provision of central hardscape. City Fire-Rescue staff who contributed to the content of the EIR discussion regarding fire safety is listed in EIR Section 11.0, *Individuals Consulted/Preparers*.

SI44-2 Comments noted. Evacuation would not be up to the project, but would be directed by technical emergency personnel, and neighborhood residents would be expected to follow their orders.

The additional evacuation options that would be added by the project are identified in EIR Section 5.14 and discussed in further detail in Response to Comment 1 from Derbique



## COMMENTS

## RESPONSES

SI44-2 (cont.) (Letter SI4). As shown on Table 2 of the Wildland Evacuation Plan, a population of 475 schoolchildren and staff from Rolling Hills Elementary is assumed in the evacuation model and are accounted for in the evacuation projections. Los Peñasquitos Elementary School was outside of the evacuation study area.

## COMMENTS

## RESPONSES

**From:** [Simone Sigell](#)  
**To:** [DSD EAS](#)  
**Subject:** [EXTERNAL] Questions  
**Date:** Monday, April 06, 2020 8:34:49 PM

---

To whom it may concern,

SI45A-1

It is important to investigate the safety of the community and the impact of Junipers in the event of a fire or earthquake and we need to evacuate.

Why is our safety not important to you?

Regards,

Simone

SI45A-1 The City takes the safety of San Diego residents seriously. Earthquake potential is discussed in EIR Sections 5.10.2, *Impact 1: Potential for Geologic Instability*, and 5.10.4, *Impact 3: Potential for Geologic Hazards*. Should an earthquake occur, it is likely that a regionwide response would be required that would be handled by County or even state officials. The County's Emergency Operations Plan addresses emergency evacuation responses to earthquakes, among other types of emergencies and disasters.

Full discussion of potential evacuation requirements, focused on fire, is provided in EIR Section 5.14, *Health and Safety*, in Section 5.14.4, *Impact 3, Emergency Response/Evacuation*. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.

## COMMENTS

## RESPONSES

From: [Simone Sigell](#)  
 To: [DSD EAS](#)  
 Subject: [EXTERNAL]  
 Date: Monday, April 06, 2020 8:39:59 PM

To whom it may concern,

- SI45B-1 It is important to investigate the safety of the community and the impact of Junipers on traffic and roads that were designed for far less occupancy in this area.
- SI45B-2 Are these proposed solutions the only solution for the community?
- SI45B-3 Can they and other areas create their own thoroughfare entrance/exit to the I15 to increase capacity and ease congestion?
- SI45B-4 This shouldn't only be a housing expansion but also planned road expansion to accommodate the additional occupants on Main thoroughfare, I 15 and the 56 and that should be part of their development.
- SI45B-5 Will they be paying mello-
- SI45B-6 Why is our safety not important to you?

Regards,

Simone

SI45B-1 The City takes safety seriously. To that end, safety elements received robust review. Please refer to Section 5.2.3, *Impact 2: Potential for Traffic Hazards*; Section 5.9.4, *Impact 3: Flood Hazards*; Section 5.9.5, *Impact 4: Potential for Pollutant Discharge and Water Quality*; Section 5.10.2, *Impact 1: Potential for Geologic Instability*; Section 5.10.4, *Impact 3: Potential for Geologic Hazards*; Section 5.13.2, *Impact 1: Potential for Inadequate Public Service Facilities*; Section 5.14.2, *Impact 1: Health Hazards*; Section 5.14.3, *Impact 2: Fire Risk*; and Section 5.14.4, *Impact 3: Emergency Response/Evacuation*.

Post-project daily traffic, and potential delay in non-wildfire emergency response, and addition of project vehicles to evacuation times are addressed in EIR Sections 5.2, *Transportation/Circulation*, and 5.13, *Public Services and Facilities/Recreation*. Regarding adjacent road segment and intersection daily operations with the project, please also refer to Response to Comment 20 from Haight (Letter SI3A). During regional wildfire events, evacuation time is presented in EIR Section 5.14, *Health and Safety*. Please also see Response to Comment 1 from Derbique (Letter SI4).

SI45B-2 Solutions to project impacts (mitigation measures proposed for the project) relate directly to assessed impacts under CEQA. Other mitigations may be possible, but these measures constitute the mitigation proposed by the project.

## COMMENTS

## RESPONSES

- | COMMENTS | RESPONSES  |
|----------|--|
|          | <p>SI45B-3 Refer to Response to Comment 2 from Birdsall (Letter SI8A), regarding lack of need for new I-15 interchanges.</p> <p>SI45B-4 Please refer to Response to Comment 3, above.</p> <p>SI45B-5 No Mello-Roos fees are proposed. As stated in EIR Section 7.1.5:</p> <p><i>The project would provide age-restricted (55+) housing, which means that, with very rare exceptions, no school age children would be permitted to reside within the development and no impacts to schools would occur. Despite generating no new school attendance, the project would be required to pay applicable impact fees to the school district.</i></p> <p>SI45B-6 Please see the Response to Comment 1 of your April 6 communication at 8:34 PM (Comment letter SI45A).</p> |

## COMMENTS

## RESPONSES

**From:** [Simone Sigell](#)  
**To:** [DSD\\_EAS](#)  
**Subject:** [EXTERNAL] Re: juniper development questions  
**Date:** Monday, April 06, 2020 9:00:40 PM

To whom it may concern,

SI45C-1 It is important to investigate the safety of the community and the impact of Junipers on schools that were designed for far less occupancy in this area.

SI45C-2 Are they proposing a new school? Paying for the schools to be expanded & for additional teachers? Overloading a school with stretched resources does nothing to uplift the community or students and brings over-crowding and all the well documented negative impact of overcrowding. Will they pay mello-roos for purposes such as this?

SI45C-3 Why is quality education and safety not important to you?

Regards,

Simone

SI45C-1 Please refer to Response to Comment 1 of your communication of 8:34 PM (comment letter SI45A) regarding safety review.

Regarding schools, whereas traditional housing developments may facilitate the construction of new schools or make payments to support schools, that is because such projects are planned to accommodate families with school-age children that will require such facilities. In this case, with age-restricted housing, school-age children would not comprise part of the project population. Nonetheless, the project would provide funds for improvements to area schools. Please also refer to the Response to Comment 5, in your communication of 8:39 PM (comment letter SI45B).

SI45C-2 The project is not proposing a new school, and adverse effects on the school system are not anticipated. Please refer to Section 7.1.5 of the EIR and see the Response to Comment 1, above.

SI45C-3 The City considers both schools and safety important. Please see the Response to Comment 1 of your communication of 8:34 PM (comment letter SI45A) and the Response to Comment 1, above.

## COMMENTS

## RESPONSES

**From:** [Simone Sigell](#)  
**To:** [DSD FAS](#)  
**Subject:** [EXTERNAL] Jijiper development questions  
**Date:** Monday, April 06, 2020 9:05:08 PM

To whom it may concern,

SI45D-1 It is important to investigate the safety of the community and the impact of Junipers on overcrowding in recreational areas that were designed for far less occupancy in this area.

SI45D-2 Are these proposed solutions the only solution for the community?

SI45D-3 Can they create their additional recreational areas? Will they be paying mello-roos?

Regards,

Simone

SI45D-4 Can they expand or create additional recreational areas areas create their own thoroughfare entrance/exit to the I15 to increase capacity and ease congestion?

SI45D-5 This shouldn't only be a housing expansion but also planned road expansion to accommodate the additional occupants on Main thoroughfare, I 15 and the 56 and that should be part of their development.

SI45D-6 Will they be paying mello-

SI45D-1 Please see Response to Comment 1 of your communication of 8:39 PM (comment letter SI45B) regarding safety. Regarding recreation, the project is not expected to result in overcrowding of recreational facilities.

Based on the General Plan standard of 2.8 acres of parkland per 1,000 population, and the assumption of approximately 911 residents in this age-controlled community, the project would generate demand for 2.55 acres of useable parkland. The project would construct a public park on parcels totaling 3.23 gross acres. This park would satisfy and exceed the project's 2.55-acre public park requirement. The plan has received approval through the Rancho Peñasquitos Recreation Advisory Group and is shown in Figure 3-10b. In addition to the public park, the project would provide a 0.52-acre privately owned park, with a public recreation easement (to allow other members of the community to use it), in the southeastern portion of the project site. The project is also installing an approximately 2.75-mile long social loop trail trending around the development perimeter, which would be HOA-owned and maintained with a public recreation easement to allow public access. This project feature is for the use of both project residents and community members, and would provide an off-street option for walking/bike riding. These HOA-owned and maintained features, which are not counted toward the park acreage requirement, would enhance the park and recreation offerings within the community.

## COMMENTS

## RESPONSES

SI45D-1 (cont.) Additionally, the project would provide nine private park areas (OS-1 through OS-9) within the market rate portion of the community. Although not open to the public, the private park areas would be expected to additionally minimize potential use of nearby public parks within the community planning area, since the private park facilities would be located closer to many of the 455 market-rate units than any public parks, including the new public park included in the project.

Residents of the affordable housing also would enjoy the public park and social loop trail amenities, as well as OS-11 and -12, totaling 0.32 acre, which is greater than the 0.23 acre of common usable open space that is required. As detailed in EIR Section 3.0, *Project Description*, all proposed common usable open space and private open space provided to residential units would meet and exceed City requirements.

As concluded in EIR Section 5.13.2.3:

*The addition of residential uses to the project site would incrementally increase the demand for park and recreational facilities. Based on the provision of on-site public park acreage in excess of the amount required and payment of required development impact fees, as well as fees for the project's contribution toward aquatic facilities and recreation center facilities, the project impacts on park and recreation facilities would be less than significant. The provision of additional privately owned but publicly accessible parkland and the social loop trail, as well as internal private usable open space areas would further reduce this less than significant impact.*



## COMMENTS

## RESPONSES

	<p>SI45D-2 Please see Response to Comment 2 in your communication of 8:39 PM (comment letter SI45B) regarding project "solutions."</p> <p>SI45D-3 Please see Response to Comment 1, above regarding the excess recreational acreage proposed by the project. Please see Response to Comment 5 in your communication of 8:39 PM (comment letter SI45B) regarding school payments.</p> <p>SI45D-4 Please see Response to Comment 3 above in this communication regarding recreational areas. Please also see the Response to Comment 3 of your communication of 8:39 PM (comment letter SI45B) regarding lack of need and other constraints for an additional connection to I-15.</p> <p>SI45D-5 Please see the Response to Comment 3 in your communication of 8:39 PM (comment letter SI45B) regarding the lack of need for additional roadway connections.</p> <p>SI45D-6 Please see the Response to Comment 5 of your communication of 8:39 PM (comment letter SI45B) regarding Mello Roos.</p>
--	--

## COMMENTS

## RESPONSES

**From:** [Simone Sigell](#)  
**To:** [DSD EAS](#)  
**Subject:** [EXTERNAL] Re: Juniper development questions  
**Date:** Monday, April 06, 2020 9:06:22 PM

To whom it may concern,

SI45E-1 It is important to investigate the safety of the community and the impact of Junipers on overcrowding in recreational areas that were designed for far less occupancy in this area.

SI45E-2 Are these proposed solutions the only solution for the community?

SI45E-3 Can they create their additional recreational areas? Will they be paying mello-roos?

Regards,

Simone

SI45E-1 Please see the Response to Comment 1 of your communication of 8:39 PM (comment letter SI45B) regarding safety. Please also see the Response to Comment 1 of your communication of 9:05 PM (comment letter SI45D).

SI45E-2 Please see the Response to Comment 2 in your communication of 8:39 PM (comment letter SI45B) regarding project "solutions."

SI45E-3 Please see the Response to Comment 1 of your communication of 9:05 PM (comment letter SI45D), regarding the excess recreational acreage proposed by the project. Please see the Response to Comment 5 in your communication of 8:39 PM (comment letter SI45B) regarding Mello-Roos.

## COMMENTS

## RESPONSES

**From:** Darlene Simmons  
**To:** DSD EAS  
**Cc:** Darlene Simmons  
**Subject:** Junipers / Project No.586670  
**Date:** Wednesday, February 19, 2020 5:56:00 PM

I do not support the Junipers / Project No.586670 and I'm sending to voice my concerns:

- SI46-1 • Too much recent rapid growth in the area (e.g. removal of low income housing replaced with high density apartments, condos) all traveling thru the Penasquitos Drive/Carmel Mountain traffic lights, as well as getting on/off of I-15 going North or South. Way too much traffic to fast, too soon and I-15 is already packed, with too many days of red traffic delays. Seems like other areas of the county would be better to add more homes.
- SI46-2 • Older homes up on the hill have always had very low water pressure. I'm concerned with so many new homes being built at the bottom, it truly feels like the water pressure is getting lower and I feel that the Junipers/Project No 586670 will just make it worse.
- SI46-3 • I do not feel safety issues with wild fires have been addressed adequately. I think this project should re-consider adding another on/off ramp to I-15 from within their project. If they would buy 2-3 homes on the North end of the golf course they could also add a way that the community could travel thru this new complex to use these new I-15 entrances/exit. Even if these new I-15 entrances/exit only work for I-15 Southbound (no bridge for Northbound) it would be a BIG help to eliminate traffic and safety issue fears for wildfires.
- SI46-4 • Our streets in this area have many potholes and many need paving/re-surfacing. And by the time the construction for this project is complete even all of Penasquitos Drive/Carmel Mountain would need to be resealed (not just patch of holes). Will this project foot the bill to pay for the entire residential area off of Penasquitos Drive/Carmel Mountain exit be repaved (not patched) ? If so, this would help owners accept the inconvenience of construction headaches and burden of traffic on existing roads that will clearly increase.
- SI46-5 • Our local elementary school is in need of more class rooms, gym, lunchroom eating area. Would this project be willing to help fund such? Original builders helped to build schools in the area, thus it seems this project should accept cost for improvement of nearby schools & libraries. Again, it would help the community to accept the proposed construction where it appears the city and builders win, but current owners lose.
- SI46-6 • Roundabouts do not help existing owners, but will slow existing owners to help added residence. Doesn't seem right, nor safe.
- SI46-7 • The existing proposal for parks within this project imply parks that will be accessible for ALL of the residents in the NE part of PQ, but there is no parking provided for such residents to come enjoy walking trails, nor parks. It also looks like < 10% of the space is being designated for parks and/or walking trails. Thus, this project is asking existing residents to approve zoning change of open land, which is beautiful and helps wildlife move along the I-15 corridor. Again, doesn't seem fair.
- SI46-8 • No height restrictions in current plan. The high density approach will certainly impact owners views and property values negatively.
- SI46-9 Overall, I truly feel the Planning Commission and City politicians are selling current residents short on their promise of the golf course being zoned for open space and now wanting to convert it to high density residential property. This is unfair and I also question the legal power for their ability to make such a decision vs a vote, by local residents. It makes me question why I should continue to own

SI46-1 Comments noted. These comments do not address the adequacy or accuracy of the analyses in the Draft EIR and no response is required.

SI46-2 Comments noted. Water Facilities and supply are addressed in EIR Section 5.12, *Public Utilities*, with additional information provided in Appendix J2, Private Water System Analysis. The project and existing development to the north are served by the City of San Diego 920 Pressure Zone. This zone includes a 5.0-million-gallon reservoir located just west of Peñasquitos Drive, near the intersection of Peñasquitos Drive and Del Diablo Way. This reservoir has a 20-inch discharge line that is routed down to Peñasquitos Drive and then in Peñasquitos Drive and Del Diablo Way to supply the water distribution network located north of the project's property. There are existing areas within the development north of the project where the elevations of the homes being served relative to the elevation of the 920 Zone reservoir currently result in low water pressures.

The development of the project would not result in significant impacts to pressure. The projected water use for the project is less than the historical use of the golf course on the site as the project would use a reduced water volume compared to the prior golf course (281,400 versus 359,200 gallons per day [gpd], or 77,800 gpd less).

SI46-3 Comments noted. The City finds that the traffic safety issues with wildfires have been adequately addressed based on technical analyses undertaken for this project. Additional interchanges with I-15 are not required to address project impacts.

## COMMENTS

## RESPONSES

	<p>SI46-3 (cont.) As detailed in the EIR Section 5.14, <i>Health and Safety</i>, the project would not only adequately safeguard project residents, but would improve current evacuation times over those currently existing and provide alternative routes that are not currently available (see discussion in EIR Sections 5.14.3.2 and 5.14.4.2) and also refer to Response to Comment 1 from Derbique (Letter SI4).</p> <p>SI46-4 Comments noted. As described in Section 3.3.1.6 of the EIR, the project would resurface westbound Carmel Mountain Road along project frontage where improvements are proposed to accommodate the new right-in only access point along the southern project boundary and where bike lane/landscaping improvements are proposed between Peñasquitos Drive and I-15 and along the portion of Peñasquitos Drive associated with the Janal Way improvements.</p> <p>SI46-5 Please refer to the Response to Comment 13 from Commons (Letter SI5) for information regarding the definitions and enforcement of the 55+ age-qualified housing for the project, and the impact on schools.</p> <p>SI46-6 Please refer to the Response to Comment 20 from Haight A (Letter SI3A) for detailed information regarding the operation of the proposed roundabout.</p> <p>SI46-7 The comment misstates vehicular parking associated with project parks. Parking is provided for both the public neighborhood park (also accessible by sidewalk from Glens streets) and parallel parking would be provided along the park area on the north side of Private Driveway "A" as shown on EIR Figures 3-1, 3-10a, and 3-10b. Both regular vehicle and electric vehicle parking is called out for the Mobility Hub area (see EIR Figure 3-8). This area is also directly connected to the recreational social loop trail that encompasses the site.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI46-7 (cont.) Please refer to Response to Comment 3 from Haight (Letter SI3A) regarding potential development under existing site zoning.</p> <p>Proposed zoning would ensure that a perimeter open space zone is located around the exterior of the built area, as well as including dedicated open space areas through parks. This provides a visual buffer as well as recreational space. Please note that as stated in the biological analysis in Section 5.8.1.1:</p> <p><i>The project site does not occur within any known corridors or linkages. No portions of the project site function as linkage or corridor habitat. The site is surrounded by existing development, and as such, does not by itself function as a wildlife corridor or linkage. Black Mountain Open Space Park is the nearest undeveloped block of habitat. This area is separated from the project site by existing roadways and residential homes. The site is further characterized by open, exposed areas that lack suitable cover and resources that are typically associated with wildlife movement areas. Common birds and mammals might move through the site to forage and during dispersal activities; however, they would not be expected to use the site as a wildlife corridor, linkage, or specific travel route to and from important resources.</i></p> <p>SI46-8 EIR Section 3.3.1, <i>Project Components</i>, identifies structure heights for the market rate homes as being a maximum allowed height of 30 feet under proposed zoning (less than under existing zoning) with architectural drawings showing heights of less than 30 feet. The affordable housing component of the project would consist of a structure zoned for 40 feet in height. These heights and their visual effect on views are fully addressed in Section 5.3, <i>Visual Effects/Neighborhood Character</i>, relative to views and view obstruction. No significant impacts were identified.</p>
--	--

## COMMENTS

## RESPONSES

SI46-9  
cont.

property in San Diego, to offer rentals at a much lower than market rate (yes I'm a landlord with multiple residential units all rented below market rents with tenants often staying in our properties 10+ years, many have gone on to save \$\$ to buy their own homes). And, I feel the same about owning businesses and providing employment opportunities to other in San Diego. This shoot by the hip decision by city politicians to scrap our goals of creating and maintaining open space in San Diego is an abuse of power and one that makes me want to move out of the area, as well as move out of California. I'm very disappointed and I do not approve this project in any form.

Best Regards,

Darlene Simmons

Ps – I have reviewed your current documents at: <https://www.sandiego.gov/ceqa/draft?fbclid=IwAR1WMbKHgIyZFiftzSoTZRnXQ2Yjn7okCIGnH6QeCb92FYtnCi3U6qlrooA> and I still do not feel the city, nor this project have adequately addressed valid concerns by the citizens living in this area.

- 
- 

SI46-9 As noted in Response to Comment 7 of this letter, the proposed zoning is low to medium density, not high density, and represents a reduction in the number of units that would be allowed compared to the existing zoning. The remainder of these comments are noted, but do not address the adequacy or accuracy of analyses in the Draft EIR. No additional response is required.

## COMMENTS

## RESPONSES

**From:** [Mike Slaven](#)  
**To:** [DSD\\_EAS](#)  
**Subject:** [EXTERNAL] The Junipers Project No. 586670/SCH No. 2018041032  
**Date:** Sunday, April 05, 2020 9:00:00 PM

Sara,

I have 2 comments/questions concerning the Carmel Land, LLC, Junipers Draft EIR, that need to be addressed and answered:

SI47-1 1) The community of PQ-NE needs to know when we will be able to address the EIR Board with our public comments, in person. We are aware that public gatherings have been temporarily placed on hold, but want to confirm this unprecedented medical requirement neither takes away our Community's right to address the EIR board in person, nor gives Carmel Land, LLC an unfair advantage - by the unjust elimination of this public right.

SI47-2 2) Why is the Dudek Fire Protection Plan citing the CA Fire Code Chapter 49 as adopted by San Diego County? This code does not apply within the City of San Diego, which The Junipers Project falls in. It appears that the Dudek Fire Protection Plan is currently using the most favorable Fire Code requirements, rather than the correct Fire Code requirements, to be applied to this project. Will those parts of the Dudek's FFP be resubmitted, using the correct applicable code? (i.e. the City of San Diego utilizes the 2016 Edition of the CA Fire Code as Article 5, Division 1 of the San Diego Municipal Code).

Please submit these questions to the EIR Board for their review and responses.

Respectfully,  
Mike Slaven  
PQ-NE Action Boardmember

SI47-1 The City has established a protocol so that public comments during hearings can be submitted virtually. Public input remains critical to the hearing process, and as required, decision-makers make their decisions based on the staff report, Final EIR, and CEQA Findings prepared consistent with CEQA Guidelines Section 15091.

SI47-2 As a point of information, with a few exceptions, the City, State, and County codes are the same. Nonetheless, the reference to the County was an inadvertent typographical error and should have read..."as adopted by the City of San Diego." The Fire Protection Plan (FPP) was completed using the City's codes, and that typographical error has been revised in the Final FPP provided as part of this FEIR. Please note that City Fire-Rescue staff is listed in EIR Section 11.0, *Individuals Consulted/Preparers*.



## COMMENTS

## RESPONSES

**From:** [Shelley Stapley](#)  
**To:** [DSD FAS](#)  
**Cc:** [Councilmember Mark Kersey](#); [Rodenbo, Kyle](#)  
**Subject:** [EXTERNAL] Subject: Junipers (Project No. 586670) – Circulation  
**Date:** Thursday, March 26, 2020 7:01:53 PM

---

Dear Ms. Osborn and City Staff,

Thank you for your time in reviewing the environmental impacts for The Junipers project. I'm sure you understand and appreciate how important it is to us that the redevelopment of the golf course improves our community and neighborhood specifically, but also the community at-large.

This neighborhood has evolved significantly over the 25+ years my husband and I have lived here, especially with the recent increases in density at the Pacific Villages project and the changes in process for the Hotel Karlan. Change can be unnerving, but we see the benefits proposed for The Junipers and are optimistic it will be a good thing for the Glens.

SI48-1

I would have liked to see no through traffic heading west on Janal, however the roundabout is a good compromise to address speed on Peñasquitos Drive and deter Janal from becoming a cut through.

I appreciate the project's incorporation of bike lanes and attention to pedestrian circulation as well. My husband is an avid cyclist and these improvements to our local streets will make this activity safer.

The approach to this project has differed from other attempts to develop this property and it shows. Many neighbors are grateful for the community outreach extended to us and feel the developers have tried to plan something that benefits them while listening to neighbors desires as well.

I look forward to The Junipers and the improvements it will bring.

Thank you again,

Shelley Stapley  
14655 Wye Street  
San Diego, CA 92129

SI48-1 The commenter's support for the Peñasquitos Drive/Janal Way roundabout, proposed bicycle and pedestrian connections/amenities, and other community benefits provided by the project is noted, along with the appreciation for the community outreach by the project applicant.

## COMMENTS

## RESPONSES

**From:** [DJTooley](#)  
**To:** [DSD\\_FAS](#)  
**Subject:** The Junipers,586670/SCH No.2018041032  
**Date:** Tuesday, March 03, 2020 7:06:27 PM  
**Attachments:** DSDEAS, old golf course and hotel, Doubletree.docx

---

Ms. Sara Osborn

As per the Notice of Availability Draft Environmental Impact Report and recommendations for comments..

Respectfully David Tooley

## COMMENTS

## RESPONSES

[DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov)

3 March 2020

Good Day Mz. Osborn....

This is David J. Tooley, 11375 Nawa Way, San Diego, California 92129, [Djsi21643@aol.com](mailto:Djsi21643@aol.com), 1 858 672 2593 [in the canyon down behind the Rolling Hills Elementary School, and the golf course and original hotel, the Doubletree

We spoke some weeks ago after I received the notice of the Public Notice of Availability Draft Environmental Impact Report, Development Services Department, SAP No. 24007629

Project Name: The Junipers

Project No. 586670/SCH No. 2018041032

Community Plan Area: Rancho Penasquitos

Council District : 5

As I mentioned to you on the telephone, I believe this whole redevelopment is a very ill conceived project..

The additional housing and consequential traffic will make a compact neighborhood congested to be gentle with my remarks. Penasquitos Drive will be come a clogged nightmare...unless there are numerous other egress and ingress points....at the moment, PQ Drive is the ONLY way out for the whole neighborhood from Carmel Mountain Road up to Andorra and connecting streets.....there was one incident I remember, where the SD Fire Dept was fighting a brush fire off PQ Drive and approx. Janal St/Crt....they blocked both the inbound and outbound lanes...people who lived toward the far end, had to leave their cars at the Doubletree and walk about 1 to 1-1/2 miles to get to their home.....The other really nasty scare we had was the demand to evacuate in 2007 when the fire over in Poway and east of there jumped over Interstate 15.....luckily, no homes were burned, just a large amount of black burned out embers and soot.....My State Farm home owners policy paid for the night's stay downtown.....

That whole area along the end of PQ Drive and Carmel Mt. Road has become clogged because of all the new townhomes/apt. built in place of the original [1970's] very low income housing....and to make matters even worse, all the new townhome/apt/single family dwellings currently being built along Carmel Mt. Road from the intersection of PQ Drive on the north end to Carmel Mtn Rd south end at Carmel Mt. Road / Carmel Mt. Road / Rancho Penasquitos Blvd intersection , which were ALSO very low income housing....all those people were "forced" out to do the redevelopment..

SI49-1 Relevant to congestion on Peñasquitos Drive, the Transportation/Circulation evaluation in EIR Section 5.2 is based on a Level of Service (LOS) analysis, which specifically looks at the level of congestion on roadway segments and at area intersections.

As shown on Table 5.2-2, relevant portions of Peñasquitos Drive currently operate at LOS C, an acceptable LOS. (Acceptable LOS for freeways, roadways, and intersections is generally "D" and above.) LOS C continues for these road segments with the project (see EIR Table 5.2 6), as well as in the Near-term which models traffic loading associated with existing conditions, the proposed project, Pacific Village, Merge 56 and The Preserve at Torrey Highlands (see EIR Table 5.2-8), as well as under Horizon Year (2050) conditions (see EIR Table 5.2 10). The roadway currently operates within acceptable standards and project modeling shows that it would continue to do so even under future conditions through 2050.

## COMMENTS

## RESPONSES

	<p>SI49-1 (cont.) Relative to evacuation in time of fire, the post project improvements would be substantially improved over existing conditions (and likely from 2007 conditions). Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the evacuation plan.</p> <p>The remainder of Comment 1 is noted but does not address the adequacy or accuracy of analyses in the Draft EIR and does not require additional response.</p> <p>SI49-2 Please refer to Response to Comment 1 of this letter regarding Peñasquitos Drive segments. Regarding Carmel Mountain Road segments, Tables 5.2-2 and 5.2-6 (covering existing conditions and existing conditions with the project trips added, respectively) show that all segments are operating at LOS A, B, or C – all acceptable levels. LOS A, B, and C continues (see Table 5.2-8) through addition of cumulative projects known at the time of publication of the project Notice of Preparation (NOP) of an EIR in April 2018. Those cumulative projects included Pacific Village (extending south of Carmel Mountain Road abutting I-15), as well as the Merge 56 and The Preserve at Torrey Highlands. Please refer to EIR analyses prepared for those projects for specifics. Table 5.2-10 (2050 conditions) does show I-15 ramps dropping to LOS D under conditions with assumed build out of the area. LOS D is also considered an acceptable service level.</p>
--	---

## COMMENTS

## RESPONSES

SI49-3

What would be a good alternative???? I unfortunately don't have a reasonable answer...I don't believe anyone had a thought about changing PQ Drive from Almazon St down to Carmel Mt. Road in 1978....it was a "quiet" neighborhood of single family and some apartments to the Doubletree Hotel and the swimming pool, tennis courts accessible by home owners and elderly owners who used a section of PQ Drive to get down to the golf course on their golf carts, as PQ Drive was specifically designated for that type of traffic / travel. I seem to remember that any home owner north of the Doubletree had a free membership to use the swimming pool and tennis courts.....

Well, enough "dribble and drool" ..... I wish I had a good suggestion or idea..

Thanks for listening.....many of my neighbors are just as displeased.....I have lived in my home since buying it in 1983, many others have been there since 1978 when this last section of the original Rancho Penasquitos neighborhoods were finished.....

Truly Yours,

David J. Tooley

SI49-3 Comments noted. For clarification, it is noted that under CEQA, project alternatives are to be developed for projects with significant impacts that can be lessened through project redesign. As described above, modeling of roadway segments shows that no significant transportation impacts would occur based on the proposed implementation. As such, no alternative to address the less than significant impacts is required.

Regarding the loss of recreational amenities over time that were once associated with the project site, and the new benefits that would be provided to the community by the proposed project, please refer to the Response to Comment 7 from DeLano (Letter SI1) and the Response to Comment 1 from Haight (Letter SI3A).

## COMMENTS

## RESPONSES

**From:** [Karen Vogue](#)  
**To:** [DSD FAS](#)  
**Cc:** [Shari Collins](#)  
**Subject:** The Junipers / Project No.586670  
**Date:** Thursday, March 26, 2020 3:54:28 PM  
**Attachments:** [PO letter to Sara Osborn.docx](#)

---

Dear Ms. Osborn:

SI50-1

Attached please find my letter to you concerning the above name project. I'm a resident of Carmel Mountain Ranch just across the I-15 Freeway and am very concerned with the amount of development planned for our area.

Thank you very much for your consideration.

Karen Vogue

SI50-1      Comments noted. Each of the comments in the attached letter is responded to below.

## COMMENTS

## RESPONSES

Karen Vogue  
14788 Carmel Ridge Rd  
San Diego, CA 92128

March 26, 2020

Sara Osborn  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

Re: Junipers Project, Project #586670

Dear Ms. Osborn:

SI50-2

I live in Carmel Mountain Ranch and am concerned about the amount of construction that is proposed for communities on either side of the I-15 Freeway. I recently took a drive across the I-15 Freeway to Penasquitos to look at the issues The Junipers (536 units), Millennium PQ (331 units) and Pacific Villages (600+ units) projects will create. If you haven't already, please look at Google Maps to see how most of the people living in Northeast PQ and the children at Rolling Hills Elementary have no main escape route except on Penasquitos Drive. The majority of homes are concentrated at the northernmost part of Penasquitos Drive farthest away from the exit at Carmel Mountain Road.

The threat of wildfires and emergency evacuations are inevitable in this part of the city. We have had 3 wildfires and 3 man made fires threaten our area since 2003. The Cedar Fire in 2003, the Labor Day Brush Fire 2005, the Witch Fire in 2007, The Bernardo and Cocos Fires in 2014 and the small 4S Ranch Brush Fire of 2016. Please see the attachments for maps showing proximity to NE Penasquitos.

SI50-3

The main exit for the 536 unit project called the Junipers is from Janal Way at the lower end of Penasquitos Dr.. People have said it took them two hours to leave this area in previous wildfire evacuations. With a minimum 700 extra cars trying to exit the Junipers at the lower end of Penasquitos Drive at Janal Way and another 400 plus cars leaving the proposed Millenium PQ project it will further delay and endanger the residents living in Northeast Penasquitos. That's 1100 extra cars trying to exit at the lower end of Penasquitos Drive.

SI50-4

There are three proposed small emergency exits that would be added to The Junipers project. I was able to see two of these in person and don't believe they will help people escape this area in an emergency. I would be very afraid to be in that area in the event of a wildfire evacuation scenario, which is not if but when.

There is an emergency exit and fire truck ingress at the top of their development at Andorra Way. I got to see firsthand how narrow and steep this proposed egress is. I have attached two photos for you to see. I don't know how the developers propose to make this an adequate exit route as there is a steep drop off greater than 50 ft on one side and a home on the other. I'm

SI50-2 Comments noted. The issue of emergency evacuation was specifically evaluated in the project Wildland Fire Evacuation Plan and discussed in EIR Sections 5.14.3.2 and 5.14.4.2. The analysis shows that the project would adequately safeguard project residents, would improve evacuation times over those currently existing, and provide alternative routes that are not currently available.

The past evacuations and attachments showing general locations of past fire events and current egress conditions are noted. It is known that fire can occur in any part of the City. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the proposed emergency evacuation and access improvements and implementation of the Evacuation Plan Please see information regarding improvements in predictive modeling and coordination among City, County, and state agencies in Sections 2 and 3 of the Wildland Fire Evacuation Plan.



## COMMENTS

## RESPONSES

	<p>SI50-3 The evacuation options that would result as part of the project construction are identified in EIR Section 5.14 and further evaluated in the Response to Comment 1 from Derbique (Letter SI4). Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information regarding the Millennium PQ project.</p> <p>SI50-4 The existing condition at the Andorra connection would be improved by the project, as described in Response to Comment 1 from Derbique (Letter SI4). The comment is correct regarding existence of an adjacent home and slope, and are factored into the design, which has been reviewed and approved by the City Fire-Rescue Department. The route would be opened and made accessible by emergency response personnel, and residents using that route for evacuation would follow the directions of those personnel.</p> <p>The comment about all vehicles needing to exit the project site at Janal Way during an emergency evacuation is incorrect. Although evacuating traffic would follow emergency personnel instructions, one option would be to travel from Del Diablo Street through the project to the roundabout at the juncture of Private Driveways A and V (see EIR Figure 3-12a showing internal street connections to off-site roads). During an emergency, and as appropriate, the gate barring eastbound traffic would be opened, and cars could exit onto Carmel Mountain Road, completely bypassing Peñasquitos Drive intersections with Janal Way, Cuca Street, and Carmel Mountain Road. From there, they would be directed by emergency personnel over the mountable median in Carmel Mountain Road, as appropriate.</p>
--	---

## COMMENTS

## RESPONSES

SI50-4  
cont.

concerned a fire truck will not be able to enter if cars are trying to escape on the same road. It looks too narrow to fit both a fire truck and car side by side.

There is also another very narrow emergency exit route between two homes on Del Diablo Street near Santana. People from NE Penasquitos are supposed to enter the Junipers there, drive through most of the development and be able to "escape" with the other 700 plus cars in the Junipers onto Janal Way or the third emergency egress. This doesn't help matters because even if people are diverted into the Junipers, everyone still has to get back onto Penasquitos Drive at Janal Way. Everything bottlenecks at Penasquitos Drive and Janal Way.

SI50-5

I feel the people in the Junipers will have difficulty getting out on their own onto Janal Way as Penasquitos Drive will be backed up. The people from the Glens area trying to use this exit will back up and grid lock into their own development. If they do manage to get into the Junipers, I fear they will be trapped there as people leaving the Junipers will have trouble getting out onto Janal Way. Penasquitos Drive will be gridlocked.

SI50-6

The last emergency exit is a proposed egress from the south side of the Junipers exiting between the freeway exit at Carmel Mountain Road and Penasquitos Drive. It would be a right turn only. Carmel Mountain Rd south to the 56 will probably be backed up as well. When the next wildfire happens, there will already be backups on the 15 South and the 56 West and 1000 extra cars from the Junipers, plus another estimated 500 cars from Millenium PQ will create a huge bottleneck and trap people that live up towards Black Mountain. Again, this area has been threatened by wildfires several times in the past 15 years.

SI50-7

Please also take into consideration the 600+ new homes in Penasquitos Village where most of the residents will be left with a choice of going south on Carmel Mountain Road to exit onto Penasquitos Blvd to the 15 south or the 56 West, or going north and trying to get onto the Freeway at Carmel Mountain Road. Between the three projects, there will be an addition of 1400 plus units and even more cars.

These concerns are compounded by a proposed 1400 unit project in Carmel Mountain Ranch called the Trails at Carmel Mountain Project #652519. The early Traffic Analysis Report estimates an extra 7000 trips a day here. That will be over 2800 additional units, not people or cars, but units added to either side of the 15 Freeway between Carmel Mountain Road and the 56 Freeway. These areas were already gridlocked during evacuations in previous wildfires.

I live in Carmel Mountain Ranch by Highland Ranch Road and it took my family 45 minutes to get from Highland Ranch Road and Ted Williams Road to the I-15 during the Witch Fire. We were trapped on Ted Williams Road because the traffic was at a standstill. I remember I kept looking behind us and thinking if the fire comes this way we will have to run from our cars. Others have told me it took them two hours to leave Carmel Mountain Ranch during a fire voluntary evacuation.

This area of San Diego faces increased threats to wildfires. I urge you to, please, greatly reduce the number of homes in the Junipers and Millenium PQ for everyone's safety.

Sincerely,

SI50-5

Please see Responses to Comments 2, 3 and 4 above. Although additional options provide varying routes, all evacuating individuals would be subject to emergency personnel direction. The SDPD is the lead agency for evacuations within the City, including the Glens community. The SDPD, as part of a Unified Command, assesses and evaluates the need for evacuations, and orders evacuations according to established procedures. Please refer to Section 2, *Background*, and Section 3, *San Diego City Evacuation Planning Summary*, of the Wildland Fire Evacuation Plan for information on regional agency cooperation, preplanning, and effects of technological advancements resulting in improvements in evacuation since earlier wildfire events.

SI50-6

Please refer to Responses to Comments 4 and 5 regarding emergency personnel direction. Drivers entering Carmel Mountain Road from Private Driveway V may be directed to turn right, or to cross the mountable median and turn left. This would be determined by personnel in charge at the time. It is acknowledged that evacuation events are not necessarily free flow in nature. Area roads are made to accommodate peak hour traffic, which occurs during business hours. Fire location, size, direction, winds, nature of land uses in the vicinity, and available roads, are all factors considered during evacuation events. This is what informs the value of the Unified Command described in Responses to Comments 2 and 5, above.

## COMMENTS

## RESPONSES

SI50-7 Comments noted. Pacific Village would evacuate to the north or south, getting onto I-15 or SR 56, as appropriate. Please note that the Pacific Village development (Peñasquitos Village) actually is redevelopment of a site that contained existing residential uses, and therefore does not comprise a net increase of 600+ new homes. Regardless, please see Responses to Comments 2 and 5 above regarding emergency personnel direction.

Regarding The Trails at Camel Mountain Ranch, please note that this project was not known at the time that the proposed project Notice of Preparation was issued on April 10, 2018, at which time the environmental baseline for the EIR analysis was set. Please refer to the Response to Comment 5 from DeLano (Letter SI1) for additional information. Please refer to the Response to Comment 1 from Derbique (Letter SI4) for detailed information regarding the implementation of the evacuation plan.

As detailed in the responses above, however (see particularly Response to Comment 3), the project would improve options for evacuation over the existing condition. Project implementation would provide benefit, rather than an adverse impact, for this issue. This conclusion applies to the analyses of both project impacts and cumulative impacts.

COMMENTS

RESPONSES



Escape route at Del Diablo near Santana

COMMENTS

RESPONSES



Escape Route at Andorra Way. The bottom looking up

COMMENTS

RESPONSES



Escape Route at Andorra Way. The top looking down.

## COMMENTS

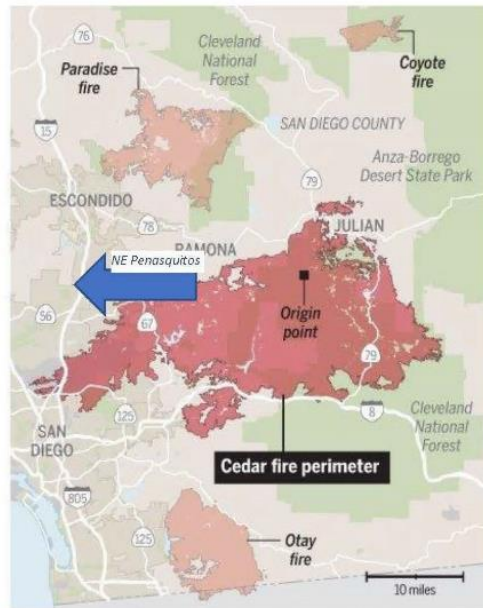
## RESPONSES

At the top of escape route at Andorra Way, looking down at the drop off.





### The Cedar Fire 2003



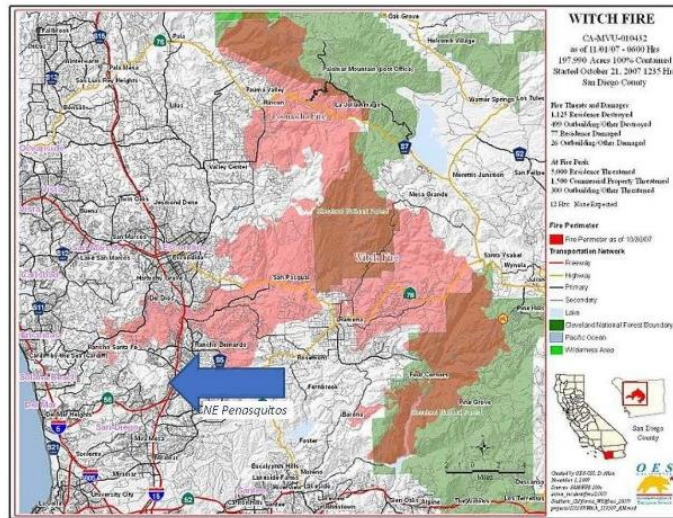
Sources: ESRI; SanGIS; San Diego State University ANDRELL BOWER • U-T

### **2005 Labor Day brush fire 200 acres**

From Wikipedia, the free encyclopedia

The **Labor Day brush fire** was a small brush fire that burned parts of [Rancho Peñasquitos](#) and [Black Mountain Open Space Park](#) in September 2005, during the [2005 California wildfire season](#).<sup>[1]</sup> Despite its small size, the brush fire was the worst wildfire to affect [San Diego City](#) in two years, since the [Cedar Fire](#) of 2003.<sup>[2]</sup> The wildfire resulted in 6 injuries, but did not result in structural damages.<sup>[3]</sup> The brush fire was determined to have been started by a teenage boy, who was subsequently arrested.<sup>1</sup>

### The Witch Fire 2007



### The Bernardo Fire – May 13<sup>th</sup> 2014 - 1548 Acres

The Bernardo Fire was a wildfire that occurred during the May 2014 San Diego County wildfire outbreak.<sup>[1]</sup> The Bernardo fire was the second of the May 2014 wildfires in San Diego County, and the first of the swarm of wildfires that ignited in mid-May, following dry weather and Santa Ana conditions. The fire ignited in 4S Ranch in San Diego County, on May 13, near Del Norte High School, and eventually spread southward and westward, burning 1,548 acres (6 km<sup>2</sup>) of land. The Bernardo Fire was extinguished on May 17, without causing any significant property losses.<sup>[2]</sup>

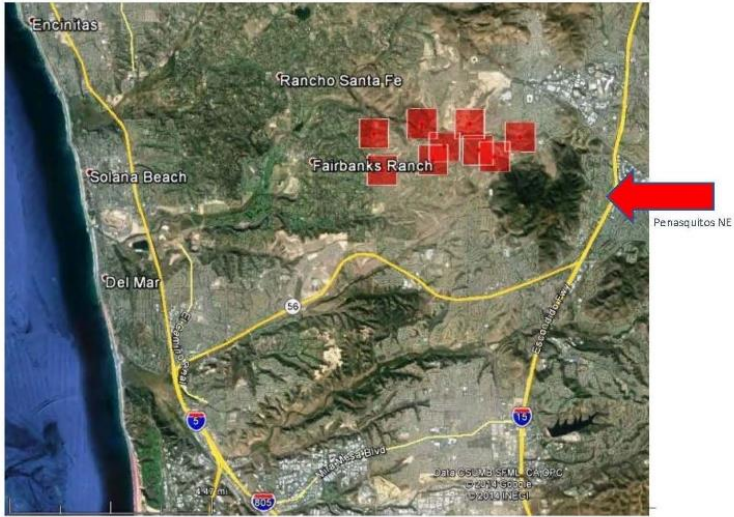
The fire started on Tuesday, May 13, at 10:00 AM PDT, just south of Del Norte High School, in a construction trench off Nighthawk Lane.<sup>[3]</sup> Over the next few hours, the wildfire intensified, due to the strong Santa Ana winds driving it southward. This prompted the evacuation of several schools (with the exception of Del Norte High School), in addition to at least 20,000 homes. Within several hours, the fire covered at least 800 acres (320 ha) and was only 5% contained. The rapid southward spread of the fire caused mandatory evacuation orders to be issued for portions of 4S Ranch, Del Sur, Black Mountain Ranch, Rancho Santa Fe, and other residential communities. Late on May 13, the Bernardo Fire reached a size of 1,600 acres (650 ha). By 12:00 AM PDT on May 14, the portion

## COMMENTS

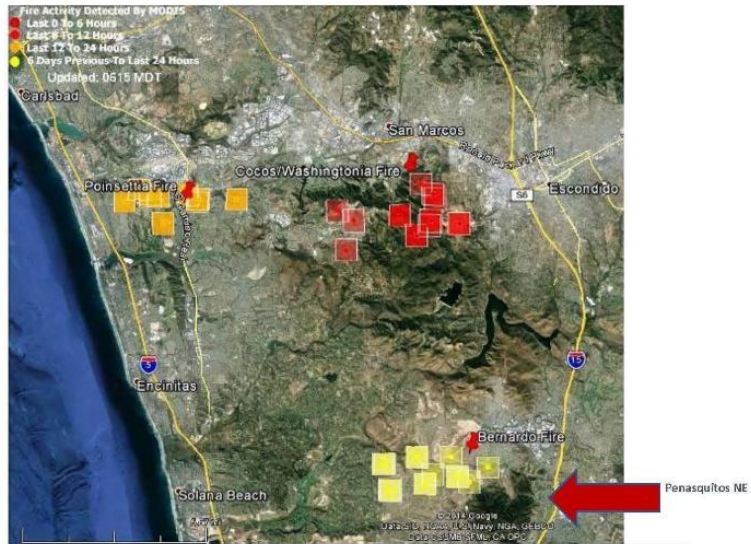
## RESPONSES

of the fire within 4S Ranch and Del Sur had been completely extinguished, which was about 25% of the Bernardo Fire's 1,600 acre blaze. Later on May 14, all of the evacuation orders were lifted.<sup>34</sup>

Image of the Bernardo Fire. The Red arrow show NE Penasquitos



### Cocos Fire May 14-22 2014 1995 Acres



### 4S Ranch brush fire 2016 – 5 acres

On Thursday, May 5, 2016, shortly before 3 P.M. PDT, a small brush fire ignited off the 15000 block of Dove Creek Road, in a creek bed, in 4S Ranch, San Diego County.<sup>[1]</sup> As the fire began spreading eastward, students and staff at the nearby Oak Valley Middle School were ordered to stay indoors, though parents were allowed to pick up their children.<sup>[2]</sup> However, as the fire continued to spread, evacuation orders were issued for some homes along Palomino Valley Road and Oak Valley Middle School, with the students from Oak Valley Middle School being relocated by bus to Westview High School.<sup>[3]</sup>

COMMENTS

RESPONSES

**From:** Karen Wilmoth <karenwilmoth@yahoo.com>  
**Sent:** Tuesday, March 03, 2020 2:30 PM  
**To:** DSD EAS  
**Cc:** Councilmember Mark Kersey; Rodenbo, Kyle  
**Subject:** Support for The Junipers (Project No. 586670)

To whom it may concern:

I recently learned about this report and the plans to redevelop the old Double Tree Golf Course in the newspaper. While I understand some of the concerns, I was happy to read in this report of the builder's plans to address those concerns directly through improvements to the evacuation routes and new parks for the neighborhood to use.

I'm also happy that these homes are for seniors. I don't live in the PQ area, but have been looking at options to move closer to my daughters and grandkids who all live in Poway. Being able to downsize to a nice, single-level home that is near them would be great. This project seems to make a lot of sense and I hope it all works out.

Sincerely,

Karen Wilmoth  
 6657 Valjean Ct.  
 San Diego, CA 92111

SI51-1

SI51-1 Comments noted. The project implementation would result in improvement in evacuation routes and park availability in the community, as analyzed in Sections 5.14, *Health and Safety*, and 5.13, *Public Services and Facilities/Recreation*, respectively. The remainder of these comments do not address the adequacy or accuracy of analyses in the Draft EIR and no additional response is required.



## COMMENTS

## RESPONSES

**From:** [Junaid Razvi](#)  
**To:** [DSD FAS](#)  
**Cc:** [Peterson, Jeff](#); [Chair RPPB](#); [Schaefer, Marc](#); [Stephan Haight](#)  
**Subject:** [EXTERNAL] Draft EIR Comments for The Junipers Project: Project No. 586670 / SCH No. 2018041032  
**Date:** Monday, April 06, 2020 4:33:09 PM  
**Attachments:** [235FA9A219B24C5DB927F69AA5C3A2C0.png](#)

**Attn: Ms. Sara Osborn**  
 City of San Diego Development Services Center  
 San Diego, CA 92102

Dear Ms. Osborn

SI52A-1

The PQ-NE Action Group (PQNE) is a 501(c)(3) public benefit nonprofit organization, and is providing comments on the subject Draft EIR in the attached file. This submittal specifically addresses issues with the Fire Prevention Plan (FPP) and mitigations presented in the EIR. It is concluded that the FPP in the EIR is deeply flawed and should be rejected in its entirety to ensure the safety of the residents of the entire Rancho Penasquitos Northeast community. This conclusion was reached as a result of a comprehensive study and analysis that was commissioned by PQNE for the FPP presented in the EIR. While these comments represent a comprehensive summary, the full report prepared for PQNE is available for review by the City review team for this project.

Please acknowledge receipt of this submittal by return e-mail.

Sincerely,

**Junaid Razvi PhD**  
 Member, Board of Directors  
**PQ-NE Action Group**  
*A 501(c)(3) Public Benefit Nonprofit Organization*



<http://www.savepq.org>  
 14829 Penasquitos Court  
 San Diego, CA 92129  
 +1 (619) 646-2140 (M)

SI52A-1 This comment introduces the commenter as a member of the PQ-NE Action Group and serves to transmit a detailed list of "Independent Findings" that represent the commenter's summary of a Fire Protection Plan Peer Review Analysis (FPPRA) that was commissioned by the PQ-NE Action Group. The comment also states that the (Fire Protection Plan) FPP is "deeply flawed and should be rejected." See detailed Responses to Comments 2 through 25 of this letter.



**REVIEW OF  
THE JUNIPERS FIRE PROTECTION PLAN  
INDEPENDENT FINDINGS**

**1. EXECUTIVE SUMMARY**

The PQ-NE Action Group (PQNE) is a 501(c)(3) public benefit nonprofit organization. The organization operates through the efforts of an all-volunteer board of directors with the support of local residents of Rancho Penasquitos. PQNE's charter and mission is to organize and inform the community on actions by the city and developers that impact this northeast Rancho Penasquitos (RP) community.

Upon release for public comment of the Draft Environmental Impact Report (EIR) on February 19, 2020 for the Junipers Project in Rancho Penasquitos, PQNE commissioned a Fire Protection Plan Peer Review Analysis (FPPRA) to evaluate the adequacy of the contained Fire Protection Plan (FPP) proposed for the Project<sup>1</sup>. To that end, PQNE obtained expert review for the FPP proposed by the DUDEK firm for the applicant and developer, Carmel Land LLC (hereinafter, Applicant) that is proposing this development in the Northeast subdivision of Rancho Penasquitos, at the intersection of Carmel Mountain Road and Penasquitos Blvd.

The other issues notwithstanding, such as *Traffic Safety* and *Infrastructure Stress*, the impact of **Fire Safety and Evacuation** of the landlocked RP subdivision that is located in a City of San Diego "Very High Fire Hazard Severity Zone" by the addition of this project represents a life threatening concern that is simply not being adequately addressed in the Draft EIR.

This submittal is a summary of the findings extracted from the FPPRA, and constitutes PQNE's comments and questions regarding the adequacy (or lack thereof) of the proposed FPP in the Draft EIR for Project No. 586670. ***The FPPRA report in its entirety is available for transmittal to City Development Services Department for review and comment.***

<sup>1</sup> "The Junipers Fire Protection Plan Peer Review & Analysis," conducted and prepared by J. Charles Weber, Fire and Life Safety Consultant, for PQ-NE Action Group (March 22, 2020)

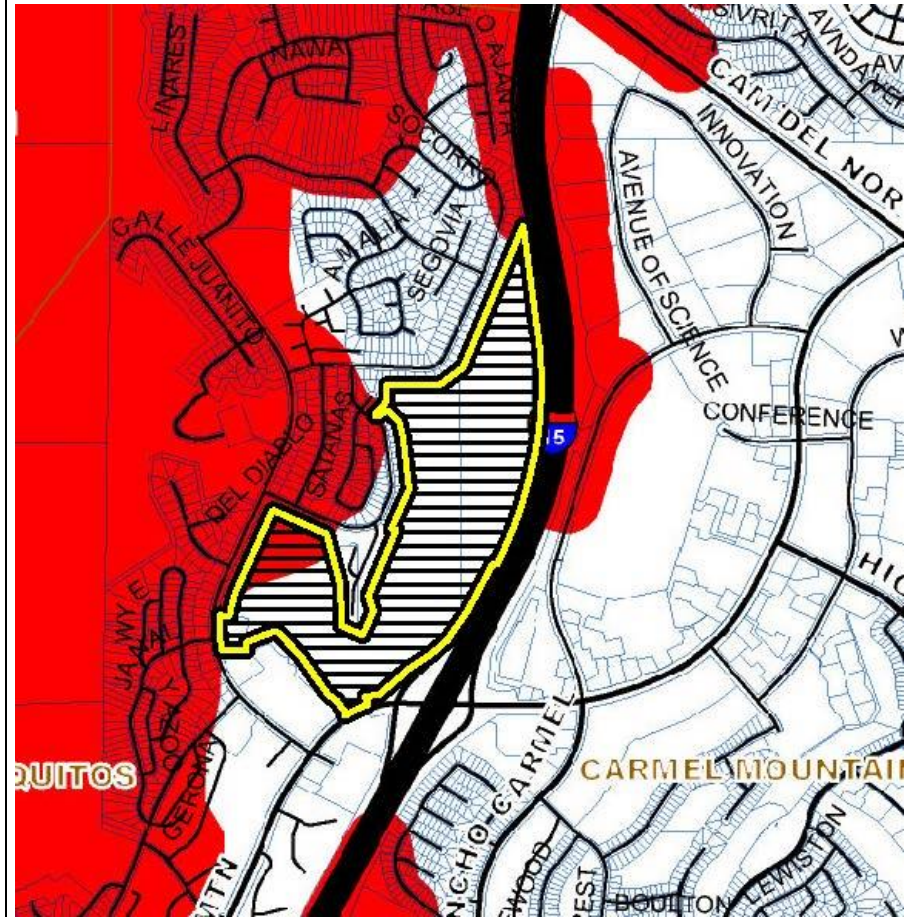
A 501(c)(3) Public Benefit Nonprofit Organization  
<http://www.savepq.org>  
[info@savepq.org](mailto:info@savepq.org)

SI52A-2

SI52A-2 This comment introduces an "independent findings" document that is the commenter's summary of the FPPRA. The commenter provides background and a summary for the remaining comments. It must be clarified that a portion of the site's southwestern and northern extents are located within a City of San Diego Very High Fire Hazard Severity Zone (VHFHSZ) per the official City map below in red, and this fact was documented within the project's FPP in Section 1.1, *Applicable Codes/Existing Regulations*. Even if the project were completely within a VHFHSZ, that designation does not imply that there can be no development. Rather, it triggers the implementation of ignition resistant construction materials and methods detailed in Chapter 7A (Ignition Resistant Construction) of the California Building Code and the City of San Diego's adopted version of that code. Please note that despite the fact that most of the project site is not within a VHFHSZ or a wildland urban interface, the FPP specifies that all structures be built to the California Fire Code (CFC) Chapter 7A ignition resistant standards.

The other topics that are briefly touched upon in this summary comment are addressed below in Responses to Comments 3 through 25.





**2. OVERVIEW**

As stated above, the FPPRA assessed the adequacy of the mitigations provided in the DUDEK Fire Protection Plan. The FPPRA was commissioned because there were perceived shortcomings in the EIR's FPP for a number of mitigation topics. To that end, the FPPRA analyzed the contents of the original plan from two (2) perspectives:

- From the viewpoint of a Fire Authority (FAHJ) reviewing the Plan and its contents for acceptability and approval as a Fire Protection Plan, as required by Chapter 49 of the 2016 Edition of the California Fire Code
- From the perspective of a neutral third party consultant with extensive fire plan review, fire protection plan review, and government project conditioning of major sub-division development and FAHJ experience.

Specifically, the FPPRA included an evaluation and subsequent findings and recommendations of two Fire Protection Plan related documents, as submitted to the City of San Diego:

- Appendix K-5, Fire Protection Plan, of the Junipers Project Environmental Impact Report (EIR), dated July 2019
- Appendix K-4, Wildland Fire Evacuation Plan, of The Junipers Project EIR, dated February 2020.

The DUDEK Fire Protection Plan submitted to the City of San Diego evaluated potential CEQA Significant Impacts resulting from wildland fire exposure hazards and identifies the measures necessary to adequately mitigate those impacts, as identified by the DUDEK Fire Protection Planning staff. As part of the assessment, the DUDEK Plan:

- Considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire protection systems and equipment, impacts to existing emergency services, defensible space and vegetation management.
- Identified and prioritized areas for hazardous fuel reduction treatments and recommends methods of treatments that will protect one or more at-risk communities and essential infrastructures. The Plan recommended measures that property owners can take to reduce the probability of ignition of structures throughout the area addressed by the Plan.

For ease of review by the City of San Diego Development Services Department, the FPPRA generally followed the layouts of the DUDEK Fire Protection and Evacuation Plans. If a matter was duplicated in both documents, or stands alone in one document but can be cross-referenced to the other, that issue was clearly identified in the FPPRA as a FPP sub-section and then evaluated for its impact on the original FPP.

If the FPP complied with the prescriptive requirements and intent of the various applicable Codes, Standards and City of San Diego Fire Department Fire Prevention

SI52A-3 Comments noted. The comment outlines the methodology that was followed in reviewing the FPP and Wildland Fire Evacuation Plan (Evacuation Plan) for the proposed project, and references the FPPRA that was commissioned by the PQ-NE Action Group and provided to the City with a subsequent letter by the commenter (Letter SI51B). No response is required to this information, with one exception. The comment includes inaccurate information regarding fire protection plans. Fire protection plans are not a requirement of Chapter 49 of the 2016 CFC. Fire protection plans are a tool that can be used to minimize and mitigate potential for loss from wildfire exposure. San Diego Fire and Rescue Department (SDFRD) did not require a fire protection plan for the proposed project. Rather, the project applicant elected to prepare a fire protection plan as part of the project's proactive approach to wildfire safety.

## COMMENTS

## RESPONSES

SI52A-3 cont.	<p>Division's Policies, that particular sub-section of the FPP was marked as compliant, with no further comment.</p> <p>If there was questionable or non-compliant content in the original FPP, the analysis duplicated the applicable section in the FPPRA, followed by findings/determinations and recommendations.</p> <p>If there were questions on and issues with the Wildfire Evacuation Plan, they were duplicated in the applicable section in the FPPRA, followed by findings/determinations and recommendations. Any issues identified in the Evacuation Plans that do not represent a potential direct cross-reference to the original FPP were included in a separate section of the FPPRA, following the main body of the full evaluation report<sup>2</sup>.</p>	
SI52A-4	<p><b>3. FPPRA MAJOR FINDINGS</b></p> <p>Review of The Junipers Fire Protection and Evacuation plans revealed significant shortcomings in providing adequate mitigations for CEQA Wildfire Significant Impacts <i>in a number of major categories</i>.</p> <p>The following sub-sections will identify those CEQA Wildfire Significant Impact categories where mitigations that were not adequately proposed and non-compliance issues with State and Local prescriptive regulations, ordinances and policies.</p>	SI52A-4 Comments noted. The comment summarizes the more detailed comments that follow and introduces those comments. No response is therefore required to this information, with one exception. The details provided in the FPPRA are not consistent with this commenter's conclusion that The Junipers' FPP "revealed significant shortcomings." Responses to Comments 5 through 25 below, and to Comments 1 through 166 of the subsequent letter by the commenter (Letter SI52B), provide additional details regarding the FPPRA's findings. These responses to Comments clarify that the FPPRA and the FPP are very similar in their conclusions.
SI52A-5	<p><b>3.1 Applicable Codes/Existing Regulations</b></p> <p>The Junipers sub-division is located within the jurisdictional boundaries of the City of San Diego. It is subject to the (i) San Diego Municipal Code, (ii) California Fire and Building Codes as amended and adopted by San Diego, and (iii) fire and life safety policies developed by the San Diego Fire Department Fire Prevention Bureau policies.</p> <p>The FPP in the EIR indicated that the Project Site would be consistent with the prescriptive requirements of the <i>San Diego County Consolidated Fire Code Chapter 49</i>. We note that the City is <u>not</u> subject, and is independent of, the County of San Diego and its Consolidated Fire Code. The City has adopted and amended its own version of the California Fire Code and is not a signatory party to the County Consolidated Fire Code.</p> <p><i>Why is the applicant allowed to apply San Diego County fire codes to this project when the project site in Rancho Penasquitos lies within the City of San Diego? City (not County) codes and policies apply, which requires that the Dudek FPP as presented to the DSD be rejected.</i></p>	SI52A-5 The reference to San Diego County in Section 1.1 of the FPP was a typographical error that has been corrected to reference "City of San Diego." The FPP states in Section 1.1 that it was prepared using Section 142.0412 of the City of San Diego Municipal Code (Brush Management) and California fire and building codes, as adopted by the City of San Diego, as the guiding baseline. The FPP then provides measures above and beyond those requirements as part of the conservative approach to wildfire safety. Therefore, the request in this comment that the FPP must be rejected based on use of the County instead of City codes is based on an inaccurate assumption. The typographical error has been corrected in the FPP.
	<p><sup>2</sup> "The Junipers Fire Protection Plan Peer Review &amp; Analysis," conducted and prepared by J. Charles Weber, Fire and Life Safety Consultant, for PQ-NE Action Group (March 22, 2020)</p>	

### 3.2 Brush Management, Fuel Modification Zones and Fire Defensible Space

SI52A-6	<p>For purposes of this analysis, the terms brush management zones (BMZ), fuel modification zones and defensible space are used interchangeably terms for fire and life safety purposes. They all describe the same principle of providing clearance around buildings and structures that decreases the threat of fire spreading to and igniting buildings and provides firefighters with an anchor point to safely operate from during fire suppression operations.</p>	SI52A-6 Comment noted. The comment provides context and definitions related to the comments on brush management that follow. The City does not dispute the statements within this comment.
SI52A-7	<p>In this regard the FPP submitted by the applicant:</p> <ul style="list-style-type: none"> <li>States that 100 feet of BMZ is <u>not</u> required for The Junipers site because there are no adjacent wild land fuels. This is incorrect.</li> <li>As a result, the FPP does not address the matter that there <u>will</u> be unmanaged brush and grassy fuels adjacent to The Junipers project site on its western and eastern sides.</li> </ul>	SI52A-7 The comment selectively extracts text without full context. It is true that the FPP states typical Brush Management Zones (BMZs) are not required at the project site, which was consistent with the SDFRD's interpretation when they reviewed and agreed with the FPP's approach. BMZs are not required for the project because there is no unmaintained wildland vegetation adjacent to the site. Development surrounds the site on all sides. Nonetheless, the FPP considers the project location near open space associated with the Black Mountain Open Space Park and the potential for embers from distant wildfires, and requires the use of fire-resistive building materials and landscape areas throughout the project. As indicated in Section 1.2.2, <i>Project Description</i> , of the FPP, typical SDFRD 100 feet of BMZ is not required for the project site as there are no immediately adjacent wildland fuels. The project design includes HOA-managed open space lots around the entire project perimeter. Most of these will consist of paved or irrigated landscaped areas, with ignition-resistant landscaping. The biological mitigation area adjacent to I-15 will also incorporate relatively low fuel species with a high moisture content (based on the re-establishment of a drainage through the mitigation area and planting of primarily wetland species). Required maintenance of this area would include removal/ replacement of dead or dying plants and removal of non-vegetative trash/debris.
SI52A-8	<ul style="list-style-type: none"> <li>States that The Junipers site is <u>not</u> in a Very High Fire Severity Area (VHFA) or in a Wildland Urban Interface (WUI) area. This is a serious flaw in the FPP. Portions of The Junipers project site, again on <u>both</u> sides of the development, are <u>conclusively</u> inside of VHFA lands. The site is also inside of a WUI area that extends past The Junipers development to the east side of the Interstate 15 right-of-way corridor.</li> </ul>	
SI52A-9	<ul style="list-style-type: none"> <li>The FPP narrative does <u>not</u> effectively take into consideration that the prescriptive regulations of California Government Code 51182 require that <u>all</u> buildings within a Local Response Area (LRA) inside of a City of fire protection district, must be provided with fuel management practice on lands either in or adjacent to VHFA zones.</li> </ul>	
SI52A-10	<p>First, since the FPP has incorrectly ignored the BMZ requirements, the SDFD Brush Management Policy B-08-01 that requires that all residential parcels in the City <u>must</u> be provided with 100 feet of fuel modification zones/defensible space. If 100 feet of FMZ cannot be provided because of parcel constraints, the defensible space shall be provided to the parcel's property lines on all sides of the buildings.</p> <p>Second, the FPP indicates that a number of undefined Open Space Areas will be provided inside the development site. Government Code Section 51182 requirements for defensible space does not apply to Open Space designated for endangered species habitats, lands kept in a natural states as habitats, environmentally sensitive parklands or other lands having scenic values. <u>No</u> mitigations were provided for the unspecified Open Space areas in the FPP and have to be addressed.</p>	

## COMMENTS

## RESPONSES

	<p>SI52A-7 (cont.) There will not be unmaintained brush and grassy fuels on the projects' west and east sides, as the comment states. There are unmaintained open space areas within the Black Mountain Open Space Park and east of the I-15, but both of these areas are at distances where direct flame or heat on project structures would not occur and the ember production that is possible, has been contemplated and addressed in Section 3, <i>Determination of Project Effects</i>, and Section 5.4.1 of the FPP.</p> <p>SI52A-8 The comment is inaccurate. FPP Section 1.1 states that a portion of the project is within an area designated as a VHFHSZ. Again in Section 5.4.1, <i>Fire Response</i>, the FPP states most of the project site has not been placed into a VHFHSZ (meaning portions of it have been designated VHFHSZ). Despite the fact that most of the project site is not within a VHFHSZ, the FPP specifies that all structures would be built to the Chapter 7A (CFC) ignition resistant standards.</p> <p>SI52A-9 This comment is incorrect. The project is not subject to BMZ requirements. Please refer to the Response to Comment 7.</p> <p>SI52A-10 As detailed in Section 6.6.2 of the project's FPP, the project is not in conflict with the City's BMZ requirements or the Government Code. Per the City of San Diego Land Development Code, a brush management plan is required for areas that contain native or naturalized vegetation that is within 100 feet of a structure. The project site is over 100 feet from wildland vegetation and is completely surrounded by development. Furthermore, the majority of the site will be developed with an irrigated, fire-resistive, ornamental plant palette, the only exception being the biological mitigation area.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI52A-10 (cont.) This area will consist of a relocated drainage that will include primarily wetland plant palettes that generally exhibit a higher moisture content, and will be maintained to remove dead or dying plants and trash/debris. A brush management program is not required.</p>
--	---



## COMMENTS

## RESPONSES

<p>SI52A-11 Evaluation of the proposed landscaping plan and FPP Appendix C has identified that four (4) unacceptable/prohibited plant species are proposed for various areas of the development site:</p> <ul style="list-style-type: none"> <li>• Acacias</li> <li>• <i>Muehlenbergia</i> (deer grass)</li> <li>• Pines</li> <li>• <i>Salvia</i> – all sage species</li> </ul>	<p>SI52A-11 The landscape palette has been revised to remove these genera and replace them with plant types not found on the prohibited plant list or otherwise known to be more flammable species.</p>
<p>SI52A-12 <i>Clearly, the Applicant has ignored brush management zones, fuel modification zones and defensible space requirements codified for the City of San Diego. How does the City of San Diego DSD plan to address and overcome this serious shortcoming in the EIR?</i></p>	<p>SI52A-12 As detailed in the Responses to Comments 6 through 11 above, the City disagrees with the commenter's conclusion stated in Comment 12. See Section 5.14.3, <i>Impact 2: Fire Risk</i>, of the EIR which analyzes the project's fire risk, as well as the associated FPP appendix K5. The project is not within 100 feet of wildland vegetation and would comply with applicable State and City standards associated with fire hazards and prevention.</p>
<p><b>3-3 Evacuation Routes</b></p> <p>The Fire Protection and Evacuation Plans propose the use of emergency egress routes that are barricaded by gates or removable bollards on a daily basis.</p> <p>Reliance on restricted emergency egress routes is problematic from two perspectives:</p> <ul style="list-style-type: none"> <li>• Fire-related human behavior characteristics</li> <li>• Resource allocation limitations during emergency events</li> </ul> <p>Key research performed to understand the effects of stress on emergency evacuation behavior has shown that stress during an emergency can be brought on by several different complex conditions or states<sup>3</sup>. Other than the obvious threat from physical harm, fires can cause other conditions or states including uncertainty/ambiguity, information overload and time pressures.</p> <p>SI52A-13 Uncertainty for residents has been shown to occur because of:</p> <ul style="list-style-type: none"> <li>• Missing information</li> <li>• Unreliable information – actual or perceived</li> <li>• Ambiguous or conflicting information – more than one interpretation of facts presented</li> </ul> <p>Research has been performed on the influence of the built environment on evacuation behavior. Researcher Jonathon Sime performed much of this work, which relates to the Affiliative Model, where people will attempt to use exits that are familiar to them before (and during) an emergency event. Sime, through his valuable research, also found that people attempt use the exit route that is the same used for entry into the premises.</p> <p>His "Affiliative Model" also predicts that if an egress route is not in regular, repeated use, and thus unfamiliar to the general population, it is less likely to be used during fire evacuations. Therefore, <i>people will prefer to use the most familiar egress driving routes</i></p> <p><sup>3</sup> SFPE Handbook of Fire Protection Engineering, Chapter 28, "Human Behavior in Fire," pp. 2100 – 2102, 5<sup>th</sup> Ed., Vol. 2, 2016</p>	<p>SI52A-13 The comment references research that indicates people during evacuations will experience confusion which will complicate the evacuation. Research referenced in the project's Evacuation Plan counters the commenter's references, indicating that the general population reacts predictably when provided direction from officials. Evacuations are now highly orchestrated events in San Diego County (all jurisdictions) and that is based on experience from numerous large evacuations, investment in technology to assist evacuations, and understanding of where resources and personnel would be deployed to control downstream intersections and move populations that are at greatest threat. The remainder of the comment focuses on the project's inclusion of new or updated evacuation routes that will be controlled via gates or bollards. As detailed throughout the FPP and Evacuation Plan, the project will add an emergency egress onto Carmel Mountain Road and will improve and enhance the usefulness and reliability of the existing emergency evacuation access to the north off of Andorra Way. This equates to three potential egress routes</p>



## COMMENTS

## RESPONSES

SI52A-13  
cont.

*and this is exacerbated during emergencies.* In this case, Penasquitos Drive will be the only egress point for the entire subdivision. This neighborhood street is a two lane street with only one egress point at Carmel Mountain Road towards I-15.

Other Sections of the FPP indicate that the emergency egress points will be provided with a system of removable barricades or gates that must be moved, or controlled, by either police officers, fire department resources or representatives of The Juniper's Home Owner's Association (HOA) to allow access to these exit points during emergency events for the entire subdivision.

Reliance on law enforcement or fire resources to open egress points does not take into consideration resource limitations and availability to perform logistical support functions during dynamic and the expected rapidly evolving emergency incidents due to the location of this northeast subdivision of RP.

Using HOA representatives to open egress points are similarly problematic because of:

- Specific persons must be designated and trained to perform these functions
- The representative must be available 24-7-365 to perform the assigned task(s)
- HOA representatives are not authorized to possess or use City of San Diego Knox keys or key switches
- Removing of bollards may require physical strength that HOA representatives may not have, or will continue to, or possess as they age.

The FPP and Evacuation Plan documents clearly indicate that various types of gates will be provided along emergency egress routes:

- At the Carmel Mountain Road-Private Road "V" entry point, a gate requiring unlocking by either first responders or HOA representatives is planned to obstruct the south-bound exit lanes from the sub-division area.
- At the Corte Raposo-Andora Way emergency access connection road, dual radio-controlled overhead swinging traffic gates are proposed. Proposed activation of these gates is stated as either being from fire department personnel or by HOA representatives.

When access to gated communities is difficult for emergency responders, the Fire Marshal is authorized to require installation of a Knox key switch at an acceptable location adjacent to the gate. No other primary gate control system are currently permitted by the SDFD.

The proposed evacuation routes for the combined The Glens and The Junipers subdivision are discussed further in Section 2.6.

SI52A-13 (cont.) during an emergency, providing options that are not currently available to emergency managers. The requirement to provide gates and bollards is not a new condition in San Diego. Gated and bollarded ingress and egress routes occur throughout San Diego as a way to eliminate or control day to day traffic in areas that are reserved by the SDFRD for emergency apparatus access or evacuation routes. These controls are in place also to prevent evacuation traffic from traveling in a direction that may not be safe. During an emergency evacuation, the threat and its movement are evaluated and evacuations are based on situational awareness of those communities or neighborhoods that are in the path of the threat. Evacuations are then declared ahead of the threat to move people away from the threat, as discussed in Evacuation Plan Section 4.1, *Evacuation Route Determination*. In some cases, evacuating people to the north may not be considered a good approach and having the gate and bollards in place would help fire and law enforcement control that evacuation and send traffic in the safest direction. Conversely, if evacuation to the south is considered not possible or not safe, then applicable gates and bollards could be opened or removed, respectively, so that vehicles can proceed in the desired direction. As stated in FPP Section 6.2, *Gates*, the project's gates and bollards would be fitted with Knox key switches as well as other remote opening devices specified by the SDFRD.

<p><b>3.4 Secondary Road Access for Over-length Roads</b></p> <p>The secondary access proposed for the Project has a number of deficiencies and relies upon “emergency egress only points”, which have been shown by fire-related human behavior research to be inadequate if not used on a repeat, daily basis<sup>4</sup>.</p> <p>The FPP refers to over-length road mitigations and states that these will comply with CFC Section 96.1.505. Section 96.1.505 is a County of San Diego amended section. Section 96.1-505 contains identical verbiage as found in CCR Title 14 and provides a maximum length of 800 feet for all dead end roads and dead-end cul-de-sacs and looping roads leading back to the dead-end road.</p> <p>The FPP states that the maximum length of dead end road length in The Junipers Project is 800 feet. It further states that there are <i>no</i> dead end cul-de-sac lengths in these areas that will exceed 800 feet. Evaluation of the Project’s proposed street and parcel map indicates that there <i>are</i> several dead-end streets within the site that <i>exceed</i> 800 feet, including cul-de-sacs, given that the proposed design of the street system is supposed to be compliant with the prescriptive requirements of the SDCCFC and CCR Title 14.</p> <p>The FPP does not provide effective mitigations for those over-length roads identified within The Junipers development footprint.</p>	<p>SI52A-14 The referenced discussion has been revised to state as follows: Dead end roads and secondary access are provided to the satisfaction of the SDFRD (refer to Section 6.1.2, <i>Secondary Access</i>, of the FPP). Compliance with County codes is not required.</p>
<p><b>3.5 Shelter-in-Place Strategy</b></p> <p>The FPP infers that The Junipers development could comply with Shelter-in-Place Community standards because of its proposed fire resistive construction and fuel management practices.</p> <p>Comparison of this potential strategy to Shelter-in-Place Community standards indicates that minimum Shelter-in-Place prescriptive requirements cannot be met within The Junipers sub-division because of Project constraints. It further does not analyze how such a flawed strategy would apply to the approximately 1500+ existing residences in the overall northeast subdivision of RP, where established structures are 30 to 50 years old and may not meet all fire resistive construction standards that the sub-subdivision of Junipers proposes for its construction. This is a major flaw where the applicant has ignored the surrounding community in its FPP.</p>	<p>SI52A-15 The FPP does not state that the proposed project and the Glens would be utilized as shelter in place communities during a wildfire. The FPP states in Section 9, <i>Conclusion</i>, that the “Junipers Project is not labeled 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 (same) layers of fire protection as The Junipers, determine that it is safer to temporarily refuge residents on the site than to evacuate.” The FPP does not include the Glens within its assessment of whether the project could be used for this temporary on-site sheltering. Section 3.3.3, <i>Shelter-in-Place (County EOC Discussion)</i>, of the Evacuation Plan does indicate, however, that the Glens is not likely usable as a temporary on-site shelter.</p>
<p><b>3.6 Evacuation Routes and Evacuation Timing</b></p> <p>Analysis of the Evacuation Plan indicates that a minimum ten (10) hour evacuation period is needed for the established The Glens subdivision adjacent to The Junipers development using existing roadways.</p> <p><sup>4</sup> SFPE Handbook of Fire Protection Engineering, Chapter 28, “Human Behavior in Fire,” pp. 2100 – 2102, 5<sup>th</sup> Ed., Vol. 2, 2016</p>	<p>SI52A-16 The comment states that the project’s Evacuation Plan indicates that a minimum of 10 hours is needed to evacuate the Glens using existing roadways. This is inaccurate as</p>

## COMMENTS

## RESPONSES

SI52A-16 cont.	<p>The Evacuation Plan indicates that development of The Junipers sub-division will provide two additional/enhanced evacuation routes out of the isolated joint communities. Provision of these additional evacuation routes purportedly creates a decrease of overall evacuation times, ranging from 3.5 to 8.3 hours, for the combined communities. The evacuation plan, however, does not take into consideration that multiple egress points used by the additional routes are barricaded with gates and bollards that must be physically removed or electronically opened by HOA representatives or first responders. Neither the Fire Protection or Evacuation Plans acknowledge that first responders for fast moving, dynamic fires will be committed to incident stabilization operations and will not be available for logistical support to open gates or remove locked bollards.</p> <p>An analysis of the DUDEK evacuation times and criteria applied to the additional routes out of the combined communities indicated that, overall, wildfires influenced by major Santa Ana/Northeast wind events will arrive at the project/communities boundaries <i>before</i> evacuations are completed, even when outside of the Evacuation Trigger Point perimeter zones. The Evacuation Trigger Point zone perimeters were established, according to the Evacuation Plan, at distances of three and fifteen miles from the Project Site. Evaluation of the maps provided in the Evacuation Plan positioned the Trigger Points at eight (8) miles and fifteen (15) miles away from the sub-divisions.</p>	<p>SI52A-16 (cont.) Table 4 of the Evacuation Plan indicates that using the standard travel time formula, it would take up to 8.3 hours for the Glens to evacuate under existing conditions. The comment inaccurately references the Evacuation Plan's findings stating that the project's additional egress route and the updated/enhanced northerly route would decrease evacuation times by between 3.5 and 8.3 hours. As shown in Table 4, <i>The Glens and Junipers Evacuation Travel Timeframes</i>, in Section 4.2.1, <i>Evacuation Time Discussion</i>, of the Evacuation Plan, the existing evacuation time is estimated to be as much as 8.3 hours, and would be reduced to as low as 3.5 hours with The Junipers (5.2 hours if the improved northerly evacuation routes are not used). The comment also suggests that the FPP and Evacuation Plan do not account for the gates and barricades at secondary emergency access routes. Please refer to the Response to Comment 13 above and note that the Evacuation Plan follows standard protocols regarding calculation of evacuation travel time. The time required to open gates and remove bollards is minimal in terms of an evacuation operation. The SDFRD and San Diego Police Department are practiced, have pre-plans in place, and will integrate the gate and bollard locations into their pre-plans so that appropriate personnel can be dispatched to open/remove them when an evacuation is contemplated. The comment indicates that the Evacuation Plan text concerning the evacuation trigger point perimeter zones is not consistent with the provided map. The text, located in Section 4.3.1, <i>Evacuation Trigger Thresholds</i>, of the Evacuation Plan should read that the lesser trigger is 8 miles (not 3 miles as indicated in the Evacuation Plan) and this typographical error has been revised in the Evacuation Plan. The comment also concludes from the Evacuation Plan trigger thresholds that a fire would arrive at the site before the Glens and Junipers can be evacuated. The comment's conclusion that</p>
SI52A-17	<p><i>Expert analysis conducted for PQNE indicates major flaws in the analysis and lack of compliance with (i) primary and secondary evacuation routes, (ii) proposed shelter in place strategies and (iii) analyses with evacuation timing. These errors are detailed in Sections 3.3 through 3.6 above. Please respond on how the city plans to correct these major safety concerns identified for the residents of the RP Northeast subdivision,</i></p>	
SI52A-18	<p><b>4 Summary</b></p> <p>The FPPPA analysis has identified <i>multiple and major compliance</i> conflicts in the FPP with regard to SDFD Fire Prevention Bureau Policies and the California Fire Code as adopted and amended in the City of San Diego Municipal Code.</p>	
SI52A-19	<ul style="list-style-type: none"> <li>The recommendations in the FPP for defensible space around buildings are at best nebulous and do not provide specific guidelines that are compliant with multiple regulatory codes, ordinances and City policies.</li> </ul>	
SI52A-20	<ul style="list-style-type: none"> <li>The FPP does not acknowledge that The Junipers subdivision is in both a City of San Diego designated Very High Fire Severity Area <u>and</u> in a Wildland Urban Interface Area that extends for a substantial past the most distal boundaries of the Project site.</li> </ul>	
SI52A-21	<ul style="list-style-type: none"> <li>Ignition resistant building construction requirements are only minimally addressed in the FPP.</li> </ul>	

## COMMENTS

## RESPONSES

	<p>SI52A-16 (cont.) the fire would reach the Glens community before everyone was able to evacuate is unfounded and fails to consider the vast developed and ignition-resistant landscapes that separate the community from the nearest, continuous open space areas. Further, the evacuation timeframes estimated in the Evacuation Plan are conservative, assuming all residential household members are on site and that all households would evacuate at least two vehicles. This is a worst-case scenario and it is more likely that the evacuation times would be significantly lower than the estimates in the Evacuation Plan. Therefore, this comment does not raise any issues that have not been contemplated and addressed in the Evacuation Plan and EIR.</p> <p>SI52A-17 Please refer to the above Responses to Comments 13 through 16, which address in detail the commenter's conclusions that are summarized in Comment 17. Based on the comments, one minor text correction has been made to the Evacuation Plan, to indicate the lesser trigger point of 8 miles instead of 3 miles. No other corrections have been identified in response to these comments.</p> <p>SI52A-18 This comment summarizes previous comments within the letter regarding assertions of compliance issues. Please refer to the preceding Responses to Comments 1 through 17, as well as the responses to the FPPRA that was attached to the second comment letter submitted by Dr. Razvi on April 6, 2020 (see Letter SI52B) which further addresses these assertions. The FPP informed EIR Section 5.14, which concluded that there would be no significant impacts with respect to fire safety, based on conformance with regulatory requirements and incorporation of the FPP recommendations into the project design.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI52A-19 The project is not within 100 feet of an adjacent wildland fuel area, and is not required to incorporate defensible space in conformance with City codes, ordinances and policies. Nevertheless, the project will incorporate fire-resistive building materials and landscaping, as described in the FPP. Please refer to Responses to Comments 5, 7, and 9 through 12, which address the issues.</p> <p>SI52A-20 Please refer to the Responses to Comments 2 and 8 regarding documentation within the FPP that portions of the site are within a VHFHSZ and wildland urban interface area. The project is not within 100 feet of an adjacent wildland fuel area, but will incorporate fire-resistive building materials and landscaping.</p> <p>SI52A-21 As stated in the FPP, the project will incorporate the latest ignition resistant construction detailed within Chapter 7A of the California Building Code, which is updated every three years corresponding with the code cycles. Providing detailed descriptions of the ignition resistant construction requirements in the FPP was not considered necessary as Chapter 7A text is public information.</p>
--	--



## COMMENTS

## RESPONSES

SI52A-22	<ul style="list-style-type: none"> <li>Fire department access and emergency egress routes for residents is problematic for a number of reasons:               <ul style="list-style-type: none"> <li>Multiple ingress and egress routes are effectively barricaded by locked gates, proposed electronically controlled gates requiring fire department activation, and removable bollards that must be manually repositioned to allow use when time constraints and delays are unacceptable for timely evacuations.</li> <li>Barricading of ingress and egress routes defies the Affiliation Principle of Fire Related Human Behavior research that indicates the residents will not use egress routes unless used on a daily basis for normal ingress and egress into the community.</li> <li>Opening of emergency gates is dependent on HOA representatives and first responders for free-flow of traffic through the access openings to streets outside of the sub-division. These resources may not be readily available during major fast-moving and dynamic fire events</li> </ul> </li> </ul>	SI52A-22 This comment summarizes previous comments within the letter regarding emergency egress routes. Please refer to the Responses to Comments 13 and 16 regarding evacuation routes, gates, bollards, and resident response to direction from officials during evacuation. This commenter's referenced research represents one study's results whereas the Evacuation Plan provides numerous references that indicate public behavior during evacuations is predictable.
SI52A-23	<ul style="list-style-type: none"> <li>The proposed enhanced evacuation routes do not provide significant improvements of evacuation times for the joint communities. Analysis of evacuation times when compared to potential fire spread rates from proposed Evacuation Trigger Point Perimeters have found that flame fronts from extreme Santa Ana-Northeast wind events <i>can</i> potentially overrun The Junipers and The Glens sub-divisions <i>before</i> the evacuations can be completed.</li> </ul>	SI52A-23 Please refer to the Response to Comment 16 regarding the commenter's assertion that the suggested trigger points do not enable enough time to evacuate the project.
SI52A-24	<p><b>5. Conclusions regarding Fire and Life Safety Deficiencies in the Draft EIR:</b></p> <p>Given the numerous deficiencies noted herein, it is abundantly clear that the DUDEK Fire Protection Plan in the EIR does <b>not</b> effectively mitigate <i>all</i> of the CEQA Wildfire Significant Impacts required for new residential developments.</p> <p>Given that some of the Wildfire Significant Impacts have <b>not</b> been effectively mitigated, the Fire Protection and Evacuation Plans for The Junipers sub-division requires additional, significant analysis and development before the Fire Authority having jurisdiction can be reasonably assured that its contents provide an acceptable level of fire and life safety for the new community as well as the existing, landlocked surrounding community.</p>	SI52A-24 This comment refers to "Wildfire Significant Impacts" which are part of the FPPRA. For answers regarding your comments on the FPPRA's "Wildfire Significant Impacts" please refer to the Responses to Comments 125-128 from Razvi (Letter SI52B). The EIR and FPP address the CEQA significance thresholds through in-depth analysis and conclusions. The FPP details a layered fire protection system along with design features that have been developed and codified for building in VHFHSZs, in which only a portion of the project occurs. The EIR and FPP concluded that there are no project significant impacts related to fire or fire safety. The comment also states that the FPP and Evacuation Plan do not effectively mitigate some of the significant wildfire impacts and, therefore, require additional analysis. As documented in detail in the FPP, Evacuation Plan, and Section 5.14 of the EIR, the project would not result in new significant wildfire impacts, and would in fact result in a
SI52A-25	<p><i>The City of San Diego Development Services Department is provided this summary analysis of the FPPRA commissioned by PQNE, which addresses serious deficiencies in code compliance as well as key flaws and shortcomings in fire safety and evacuation plans that affect the safety of <b>all</b> existing and planned residences in this RP Northeast subdivision. <b>The deficiencies in the Fire Protection Plan are significant enough for the plan to be rejected its entirety.</b> You are requested to therefore, present a plan to the Community on how the City and Applicant propose to address the deficiencies in this deeply flawed FFP.</i></p>	

## COMMENTS

## RESPONSES

	<p>SI52A-24 (cont.) decrease in the calculated evacuation times for the Glens from 8.3 hours without the project to as little as 3.1 hours with the project, based on the addition of one evacuation route and improvement of another. No mitigation is required because the project would reduce evacuation travel time and would not have a significant impact with respect to fire safety. No additional analysis is necessary. Although minor corrections and clarifications have been made to the FPP and Evacuation Plan, none of these changes affect the significance conclusions within the plans or the EIR.</p> <p>SI52A-25 Please refer to the Responses to Comments 1 through 24 regarding: (1) the validity of the provided comments, (2) the benefits of the project design and lack of significant environmental impacts that would require mitigation, and (3) minor corrections and clarifications that have been made to the FPP and Evacuation Plan, none of which alter the conclusions of the FPP and Evacuation Plan or the EIR.</p>
--	---



## COMMENTS

## RESPONSES

SI52A-26

*In closing, we note that the FPPRA report for the Juniper Project is available for transmittal to City Development Services Department in its entirety for use in your ongoing permitting reviews. In your response to this submittal, please identify whom this report can be officially transmitted to for formal review.*

Sincerely yours,



**Junaid Razvi PhD**  
Member, Board of Directors  
**PQ-NE Action Group**  
A 501(c)(3) Public Benefit Nonprofit Organization  
<http://www.savepq.org>  
+1 (619) 646-2140 (M)

SI52A-26 The comment is noted. The commenter provided the referenced FPPRA report as part of a subsequent comment letter, and responses to the report are provided as part of the responses to that subsequent letter (Letter SI52B). Therefore, it is not necessary to identify a recipient for the report at the City.

## COMMENTS

## RESPONSES

**From:** [Junaid Razvi](#)  
**To:** [DSD EAS](#)  
**Cc:** [Peterson, Jeff](#); [Chair RPPB](#); [Schaefer, Marc](#); [Stephan Haight](#)  
**Subject:** Draft EIR Comments for The Junipers Project: Project No. 586670 / SCH No. 2018041032 - updated submittal  
**Date:** Monday, April 06, 2020 8:45:36 PM  
**Attachments:** [D44BB2E2E9AE4710BD8040CD66EEF439.png](#)  
[235FA9A219E24C5DB927F69AA5C3A2C0.png](#)  
[PQ-NE Fire Safety Comments to SD-DSD.pdf](#)  
[THE JUNIPERS FIRE PROTECTION PLAN PEER REVIEW.pdf](#)

Dear Ms. Osborn -

My previous submittal earlier today provided comments and questions on the FPP in the subject EIR, through a 9-page summary of a more detailed peer review and analyses performed by the PQ-NE Action Group. This 77-page complete peer review analysis and critique was referenced multiple times in my earlier submittal.

SI52B-1

Via this second submittal, we are also providing the full report as part of the Draft EIR comment process for review by the city and to give the city an opportunity to respond in detail to the findings in our analysis. **Our conclusion conveyed in the prior submittal this evening still stands of course, that the FPP in the EIR is fundamentally flawed that does not comply with the city fire code, should be withdrawn and a new FPP resubmitted for review to ensure it is compliant.**

Please acknowledge receipt of this e-mail.

Kind regards,

**Junaid Razvi PhD**  
 Member, Board of Directors  
**PQ-NE Action Group**  
*A 501(c)(3) Public Benefit Nonprofit Organization*



<http://www.savepq.org>  
 14829 Penasquitos Court  
 San Diego, CA 92129  
 +1 (619) 646-2140 (M)

----- Forwarded message -----

**From:** Junaid Razvi <jrazvi49@gmail.com>  
**Date:** Apr 6, 2020, 4:29 PM -0700  
**To:** dsdeas@sandiego.gov  
**Cc:** Peterson, Jeff <japeterson@sandiego.gov>, Chair RPPB <rppb.chair@gmail.com>, Marc Schaefer <schafermp@sandiego.gov>, Stephan Haight <stephanhaight@yahoo.com>

SI52B-1 This email correspondence attaches a brief letter and a peer review report (FPPRA) addressing the Fire Protection Plan (FPP) and Wildland Fire Evacuation Plan (Evacuation Plan) for the project. The email comment also summarizes the conclusions stated in the commenter's previous email and summary of the independent peer review by J. Charles Weber (see Letter SI52A). Please refer to the Responses to Comments 1 through 25 of your earlier email of April 6, 2020, at 4:33 PM (SI52A).

## COMMENTS

## RESPONSES

**Subject:** Draft EIR Comments for The Junipers Project: Project No. 586670 / SCH No. 2018041032

**Attn: Ms. Sara Osborn**

City of San Diego Development Services Center  
San Diego, CA 92102

Dear Ms. Osborn

The PQ-NE Action Group (PQNE) is a 501(c)(3) public benefit nonprofit organization, and is providing comments on the subject Draft EIR in the attached file. This submittal specifically addresses issues with the Fire Prevention Plan (FPP) and mitigations presented in the EIR. It is concluded that the FPP in the EIR is deeply flawed and should be rejected in its entirety to ensure the safety of the residents of the entire Rancho Penasquitos Northeast community. This conclusion was reached as a result of a comprehensive study and analysis that was commissioned by PQNE for the FPP presented in the EIR. While these comments represent a comprehensive summary, the full report prepared for PQNE is available for review by the City review team for this project.

Please acknowledge receipt of this submittal by return e-mail.

Sincerely,

**Junaid Razvi PhD**

Member, Board of Directors

**PQ-NE Action Group**

*A 501(c)(3) Public Benefit Nonprofit Organization*



<http://www.savepq.org>  
14829 Penasquitos Court  
San Diego, CA 92129  
+1 (619) 646-2140 (M)

SI52B-2 This comment is a cover letter transmitting the independent peer review analysis by J. Charles Weber and summarizing the commenter's conclusions stated in the commenter's previous email. Please refer to the Responses to Comments 1 through 25 of your earlier email of April 6, 2020 at 4:33 PM (Letter SI52A), regarding the validity of The Junipers FPP.



**J. CHARLES WEBER**  
FIRE AND LIFE SAFETY CONSULTANT

PHONE: (619) 933-3767  
EMAIL: EMBERSNOOP@COX.NET  
PO BOX 356 LAKESIDE, CA 92040



**THE JUNIPERS FIRE PROTECTION PLAN PEER REVIEW**  
RANCHO PENASQUITOS, SAN DIEGO, CA  
PROJECT APNs 313-011-6; 313-011-07; 313-011-10; 313-060-01  
March 22, 2020

**PREPARED FOR:**  
**PQ-NE ACTION GROUP**  
**14624 WYE STREET**  
**SAN DIEGO, CA 92129**

by

*J. Charles Weber*

J. Charles Weber, Fire & Life Safety Consultant

THE JUNIPERS FIRE PROTECTION PLAN PEER REVIEW ANALYSIS

1

## TABLE OF CONTENTS

Section	Title	Page
	Introduction	3
	Executive Summary	3
1.1	Applicable Codes-Existing Regulations	4
1.2	Junipers Project Summary	5
2	Proposed Project Site Risk Analysis	11
2.1	Field Assessment	11
2.2	Site Characteristics & Fire Environment	11
3	Determination of Project Effects	12
4	Anticipated Fire Behavior Modeling	12
4.1	Fire Behavior Modeling	12
4.2	BEHAVE Plus Fire Modeling Effort	12
4.3	Modeling Results	13
4.4	Project Area Fire Assessment	15
5	Emergency Response and Services	15
5.1	Fire Facilities	15
5.2	Estimated Calls & Service Demand	16
5.3	Emergency Response Times	17
5.4	Impacts & Mitigations	18
6	Fire Safety Requirements	
6.1	Roads	23
6.2	Gates	48
6.3	Driveways	52
6.4	Structures	53
6.5	Fire Protection Systems	53
6.6	Defensible Space-Fuel Modification Zones	53
7	Evacuation Plan (to be completed)	57
8	HOA Wildfire Education Program	66
9	Conclusions (to be completed)	66
10	Limitations	72
	FPPPR Conclusions	72
	References	74

**SECTION 1****INTRODUCTION**

This Fire Protection Plan Peer Review Analysis (FPPRA) has been prepared for the Junipers Residential Community Project, located in the Rancho Penasquitos community in the City of San Diego, CA.

The purpose of the FPPRA is to assess the adequacy of the mitigations provided in the Fire Protection Plan (FPP) developed by DUDEK, as contracted by the developer, Carmel Land LLC.

The Fire Protection Plan submitted to the City of San Diego evaluates potential impacts resulting from wildland fire hazards and identifies the measures necessary to adequately mitigate those impacts as identified by the DUDEK Fire Protection Planning staff.

As part of the assessment, the DUDEK Plan has considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions, and fire protection systems and equipment, impacts to existing emergency services, defensible space and vegetation management. The DUDEK plan identifies and prioritizes areas for hazardous fuel reduction treatments and recommends methods of treatments that will protect one or more at-risk communities and essential infrastructures. The Plan recommends measures that property owners will take to reduce the probability of ignition of structures throughout the area addressed by the Plan.

The FPPRA was requested based on perceived shortcomings in the original FPP related to a number of mitigation topics. The FPPRA analyzed the contents of the original plan on two (2) perspectives:

- From the viewpoint of a Fire Authority (FAHJ) reviewing the Plan and its contents for acceptability and approval as a Fire Protection Plan, as required by Chapter 49 of the 2016 Edition of the California Fire Code
- From the perspective of a neutral third party consultant with extensive fire plan review, fire protection plan review, governmental project conditioning of major sub-division development and FAHJ experience.

THE JUNIPERS FIRE PROTECTION PLAN PEER REVIEW ANALYSIS **3**

SI52B-3 Comments noted. The comment outlines the purpose and methodology that was followed in reviewing the Fire Protection Plan (FPP) and Wildland Fire Evacuation Plan (Evacuation Plan) for the project, as well as the format of the Fire Protection Plan Peer Review Analysis (FPPRA) submitted by the commenter. No response is required.



SI52B-3  
cont.

The FPPRA includes an evaluation and subsequent findings and recommendations of two Fire Protection Plan related documents, as submitted to the City of San Diego:

- Appendix K-5, Fire Protection Plan, of the Junipers Project Environmental Impact Report (EIR), dated July 2019
- Appendix K-4, Wildland Fire Evacuation Plan, of The Junipers Project EIR, dated February 2020.

The FPPRA format follows that of the DUDEK Fire Protection Plan. If a matter is duplicated in both documents, or stands alone in one document but can be cross-referenced to the other, that issue will be clearly identified in the FPPRA as a FPP sub-section and then evaluated for its impact on the original FPP.

The FPPRA narrative will follow the reporting format of the original FPP.

If the FPP complies with the prescriptive requirements and intent of the various applicable Codes, Standards and City of San Diego Fire Department Fire Prevention Division's Policies, that particular sub-section of the FPP will be marked as compliant, with no further comment. The section will not be duplicated in the FPPRA's content.

If there is questionable or non-compliant content within the original FPP, the Consultant will duplicate the applicable section in the FPPRA, followed by findings/determinations and recommendations.

If there are questions on issues within the Wildfire Evacuation Plan, the Consultant will duplicate the applicable section in the FPPRA, followed by findings/determinations and recommendations. Any issues identified in the Evacuation Plans that do not represent a potential direct cross-reference to the original FPP will be included in a separate section of the FPPRA, following the main body of the evaluation report.

SI52B-4

### **Executive Summary**

Evaluation of the Executive Summary verifies that it outlines the content of the Plan in generalities and is consistent with the findings of the DUDEK document.

***Finding:*** This section does not raise any content or Code compliance issues.

### **1.1 Applicable Codes/Existing Regulations**

SI52B-4      Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.



This FPP demonstrates that the Junipers Project will be in compliance with applicable portions of Section 142.0412 of the San Diego Municipal Code (Brush Management) and the 2016 California Fire Code. The Project will also be consistent with the latest edition of the California Building Code, Chapter 7A, and the **latest edition of the California Fire Code, Chapter 49, as adopted by San Diego County**. Chapter 7A of the California Building Code focuses primarily on preventing ember penetration into homes, a leading cause of structure loss from wildfires. Thus,

**Finding:** California Fire Code Chapter 49, as adopted by San Diego County, does not have regulatory application within the political boundaries of the City of San Diego. The prescriptive requirements of CFC Chapter 49 are adopted and amended and adopted by the County of San Diego as a sub-division of the San Diego County Consolidated Fire Code (SDCCFC).

**Finding:** The SDCCFC regulates fire protection issues for all unincorporated communities and areas within the County and does not apply to incorporated cities unless a particular city is part of a County recognized Fire Protection District (FPD) that provides fire protection services to unincorporated lands.

**Finding:** The City of San Diego is not a signatory political sub-division which recognizes and agrees to enforce the SDCCFC.

**Finding:** The City of San Diego has adopted and amended the 2016 edition of the California Fire Code as Article 5, Division 1 of the San Diego Municipal Code. Chapter 49 was not deleted or amended by the City adoption process.

**Determination(s):** Lands within the City of San Diego at the time of plan and FPP development are governed by the 2016 edition of the California Fire Code, as adopted and amended in Article 5, Division 1 of the City Municipal Code.

**Recommendation:** The terminology of Section 1.1 needs to be changed to reflect the City of San Diego Municipal Code requirements and applicable sections

## **Section 1.2 Junipers Project Summary**

### **Section 1.2.1 Location**

**Finding:** This section does not raise any content or Code compliance issues.

### **Section 1.2.2 Project Description**

**Typical SDFRD 100 feet of BMZ is not required for the Junipers site as there is no adjacent wildland fuels.** The Junipers will provide defensible space throughout the Project, particularly

**Finding:** The FPP infers that the typical 100 feet of brush management zone, also known as defensible space and fuel modification zones, is not required for the Junipers Site because there are no adjacent wildland vegetative fuels.

SI52B-5 The reference to San Diego County in Section 1.1 of the FPP, as referenced by the commenter, was a typographical error that has been corrected to reference the City of San Diego. The FPP states in Section 1.1 that it was prepared using Section 142.0412 of the City of San Diego Municipal Code (Brush Management) and California fire and building codes, as adopted by the City of San Diego, as the guiding baseline. The FPP then provides measures above and beyond those requirements as part of the conservative approach to wildfire safety. The typographical error has been corrected in the FPP to delete "County" in Section 1.1.

SI52B-6 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-7 As stated in the FPP, a brush management program with brush management zones (BMZs) is not required at the project site. Per the City of San Diego Land Development Code, a brush management plan is required for land that contains native or naturalized vegetation and is within 100 feet of a structure. The project site is over 100-feet from wildland vegetation and is completely surrounded by

SI52B-7  
cont.

**Finding:** The inference in the FPP's narrative does not take into consideration the prescriptive requirements of Government Code 51182, which regulates Local Response Area fuel management practices on lands on or adjacent to designated Very High Fire Severity Areas.

**Finding:** The City of San Diego Brush Management Policy B-08-1, applies to the construction and maintenance of all buildings and lands in a Wildland Urban Interface Area within the City.

**Discussion:**

**City of San Diego Brush Management Policy**

Section VI of the San Diego Brush Management Policy indicates the following parameters must be followed for all new and existing buildings in the City:

- Establishment of defensible space around all buildings in a WUI area.
- Defensible space Zone 1 FMZ shall be established for a depth of thirty (30') feet of the exterior walls of all buildings.
- If the depth of Zone 1 FMZ is less than thirty (30') feet, Zone 1 requirements shall extend to the property line of the individual parcel.
- Defensible space Zone 2 FMZ shall extend laterally from the outward perimeter of Zone 1 defensible space for an additional distance of seventy (70') feet, for a total defensible space depth of 100 feet.
- If Zone 2 defensible space depth cannot be provided because of parcel constraints, defensible space Zone 2 shall extend to the property line of each parcel.

Section VII of the Brush Management Policy provides for alternate means of compliance for providing equivalent fire protection that would normally be provided by full depth defensible space depths.

- Fire rated construction including non-combustible roofs and one-hour fire resistive of building exterior walls and openings.

**Government Code Section 51182**

Government Code 51182, as referenced by California Fire Code Chapter 49, reinforces the above prescriptive requirements of the San Diego Brush Management Policy.

Section 51182 regulates lands located on or adjacent to designated Very High Fire Severity Areas.

Very High Fire Severity Area (VHFA) Grid Map 41 depicts lands surrounding the Project Site of The Junipers Development.

A San Diego City designated VHFA essentially surrounds the Project Area on three (3) sides, with partial adjacency on the eastern side and immediately adjacent to the

SI52B-7

(cont.) development. Furthermore, the majority of the site would be developed with an irrigated and ornamental plant palette, the only exception being the biological mitigation area, which will generally include low fuel plants with a higher moisture content (based on the re-establishment of a drainage through the mitigation area and planting of primarily wetland species). Required maintenance of this area would include removal/ replacement of dead or dying plants and removal of non-vegetative trash/debris. This was consistent with the SDFRD's interpretation when they reviewed and agreed with the FPP's approach.

While there are unmaintained open space areas within the Black Mountain Open Space Park and east of the I-15, these areas are at distances where direct flame or heat on the project's structures would not occur and the ember production that is possible, has been contemplated and addressed in Sections 3 and 5.4.1 of the FPP.

FPP Section 1.1 states that a portion of the project is within an area designated as a VHFHSZ. Again in Section 5.4.1, the FPP states most of the project site has not been placed into a VHFHSZ (meaning portions of it have been designated VHFHSZ). Despite the fact that most of the project site is not within a VHFHSZ, the FPP specifies that all structures will be built to the Chapter 7A (CFC) ignition resistant standards.

The FPP in Section 6.6.1 and in Section 6.6.2 states that all project landscaping will be fire resistive, as an extra precaution. The project landscape palette and plans depicted in EIR Figures 5.3-5a through 5.3-5n have been adjusted in the Final EIR to ensure consistency with this requirement. A landscape plan has not yet been developed for the planned neighborhood park. The on-site ornamental landscape areas will be irrigated and will incorporate fire-resistive plants.

SI52B-8

SI52B-9

## COMMENTS

## RESPONSES

SI52B-9  
cont.

Interstate 15 right-of-way corridor, especially at the northeastern and central eastern portions of the Site.

On west side of Penasquitos Drive, the VHFSA lands extend to the right-of-way corridor in a west-to-east and south-to-north configuration, beginning near the intersection of Cuca Street.

At, or near, the intersection of Janal Way and Penasquitos Drive, the VHFSA crosses over Penasquitos Drive in an easterly direction and encompasses a large portion of the southwestern corner of The Junipers Project Site. This finger of VHFSA land continues north until reaching the Penasquitos Drive-Almazon Street intersection.

At this intersection, the VHFSA zone hooks sharply to the east, engulfing all currently developed residential lands in the area until reaching the Camino del Norte right-of-way corridor.

The proposed secondary evacuation route between Andorra Way and Corte Raposo is surrounded by the designated VHFSA lands.

The VHFSA lands infiltrate The Junipers Project Site at its northeast corner, extending in a north to south direction to approximately the half-way point of the eastern property line of Project lands.

SI52B-7 (cont.) Please also see Responses to Comments 5 and 7 of Letter SI52A.

SI52B-8 Comment noted. A brush management program with BMZs is not required at the project site per the City of San Diego Brush Management regulations. Please refer to the Response to Comment 7 of this letter (SI52B) and the Responses to Comments 5 and 7 of Letter SI52A for additional information.

SI52B-9 Comment noted. Please refer to Response to Comment 7; the FPP notes the project's partial inclusion in the VHFHSZ in Sections 1.1 and 5.4.1. As discussed in Section 6.4.1 of the FPP under the heading "Ignition-Resistant Structural Requirements," the project is exceeding code requirements by providing fire-resistive structures throughout, as would be required if all structures were within the VHFHSZ.





<p>SI52B-10 cont.</p>	<p><i>fire spread. However, structural ignitions are still possible through either building-to-building ignitions or by fire brand depositions.</i></p> <p><b>Finding:</b> The FPP indicates that The Junipers will provide defensible space throughout the Project, particularly along the I-15 corridor</p> <p><b>Finding:</b> The prescriptive provisions of Government Code 51182 apply to the Project Area, particularly those areas either encompassed by VHFSA land or within the 300 feet of the required Brush Management Buffers.</p> <p>Government Code 51182 provides the following prescriptive provisions for grass-covered lands in Local Responsibility Lands within or adjacent to VHFSA WUI lands.</p> <ul style="list-style-type: none"> <li>• Provide and maintain a minimum of thirty (30') feet fire break, devoid of all combustible vegetation around each side of occupied dwellings and other occupied buildings. If thirty feet of defensible space cannot be provided, it shall be extended to the property line of each parcel.</li> <li>• Provide additional defensible space depth to a distance of 100 feet from occupied buildings. If a total of 100 feet of defensible space cannot be provided, approved defensible space shall be provided to the property line of each parcel.</li> <li>• Defensible space required by Section 51282 regulations apply to every occupiable building erected on the Project Site.</li> </ul>	
<p>SI52B-11</p>	<p><b>Determinations:</b></p> <ol style="list-style-type: none"> <li>1. All occupiable buildings on the Project Site require defensible space provisions.</li> <li>2. Both the City of San Diego Brush Management Policy and Government Code Section 51182 require minimum defensible space depths of 100 feet (or to property lines, whichever is closer due to parcel constraints) around all occupiable buildings.</li> <li>3. For large scale, closely designed residential developments, it is common for the FAHJs to allow "sharing" of defensible space depths between adjacent parcels to obtain the minimum 100 feet of fuel modification zones depth.</li> <li>4. Evaluation of the overall design of The Junipers development site indicates that acceptable overlapping of defensible space indicated in #3 above provides the necessary fuel modification zones for all proposed occupiable buildings.</li> </ol>	<p>SI52B-11 Comment noted. Please refer to the responses to Comments 6 through 10 of this letter. Although the project is not subject to the City's BMZ requirements, project landscaping and project structures are designed to be fire resistive (refer to Sections 6.6.1 through 6.6.2.1 of the FPP), and to Section 5.14.4, <i>Impact 3: Emergency Response Evacuation</i>, of the EIR.</p>
<p>SI52B-12</p>	<p><b>Finding:</b> The FPP indicates that Open Space lots have been zoned along the entire Project perimeter.</p> <p>The FPP does not clearly indicate the type of Open Space lots that are being proposed. This lack of clarity may be problematic for the Project, as the Government Code exempts certain open space parcels from defensible space regulations.</p>	
<p>SI52B-13</p>	<p>Government Code Section 51184 provides the exclusion from Section 51182 requirements for habitats for endangered or threatened animal vegetation species and in dedicated open spaces:</p>	<p>SI52B-12 The open space lots referenced in this comment are HOA managed and maintained community common areas. Please refer to the Response to Comment 7 for additional details regarding the on-site "open spaces." In addition, please note that clarifying language has been added to the FPP regarding the types of proposed open space (Sections 1.2.2, 1.2.2.1, and 6.6.3.3 of the FPP), and to clarify, as detailed in the description of the proposed open space areas for the project</p>

## COMMENTS

## RESPONSES

<p>SI52B-13 cont.</p> <p>(a) Section 51182 shall not apply to any land or water area acquired or managed for one or more of the following purposes or uses:</p> <p>(1) Habitat for endangered or threatened species, or any species that is a candidate for listing as an endangered or threatened species by the state or federal government.</p> <p>(2) Lands kept in a predominantly natural state as habitat for wildlife, plant, or animal communities.</p> <p>(3) Open space lands that are environmentally sensitive parklands.</p> <p>(4) Other lands having scenic values, as declared by the local agency, or by state or federal law.</p> <p>(b) This exemption applies whether the land or water area is held in fee title or any lesser interest. This exemption applies to any public agency, any private entity that has dedicated the land or water areas to one or more of those purposes or uses, or any combination of public agencies and private entities making that dedication.</p> <p>(c) This section shall not be construed to prohibit the use of properly authorized prescribed burning to improve the biological function of land or to assist in the restoration of desired vegetation.</p> <p>(d) In the event that any lands adjacent to any land or water area described in subdivision (a) are improved such that they are subject to Section 51182, the obligation to comply with Section 51182 shall be with the person owning, leasing, controlling, operating, or maintaining the occupied dwelling or occupied structure on the improved lands. All maintenance activities and other fire prevention measures required by Section 51182 shall be required only for the improved lands, not the land and water areas described in subdivision (a).</p> <p>Sub-section "d" of 51184 clearly indicates that defensible space and fuel management requirements apply to lands exempted by 51184 only when:</p> <ul style="list-style-type: none"> <li>• Portions of the exempted lands are improved and/or provided with buildings or structures</li> <li>• Defensible space is only applied to the improved areas within the Habitat or Open Space</li> </ul>	<p>SI52B-12 (cont.) in EIR Section 3.3, <i>Project Characteristics</i>, that these are not unmaintained fuel sources.</p> <p>The public park and publicly accessible private park with the Mobility Zone and Bike Hub, in the southern portion of the project site, would be zoned OP-1-1, while the private open space around the site perimeter would be zoned OR-1-1. This would include the restored drainage along the eastern site boundary near I-15, and landscaped open space for the remainder of the site perimeter. A graphic depiction of these areas is provided in Figure 3-3, <i>Proposed Lot Detail and Zoning</i>, of the Draft EIR.</p> <p>SI52B-13 This comment is noted. As presented in the EIR's FPP (Sections 6.6.1 through 6.6.2.1), although the project is not subject to BMZ, the project is proposing/implementing regular maintenance of the site's landscaped areas per City regulations (San Diego Municipal Code, Section 142.0412). A habitat preservation easement is also proposed that will incorporate a drainage feature and wetland habitats with a relatively high moisture content. Maintenance of this habitat area would include removal of dead or dying plant material and removal of trash/debris.</p>
<p>SI52B-14</p> <p>The exclusionary language of Section 51184, therefore, applies to the all undeveloped portions of the Open Space or Habitat preserve which do not have any building improvements.</p>	<p>SI52B-14 This comment is noted; see the Response to Comment 13.</p>
<p>SI52B-15</p> <p><b>Finding:</b> The California State Legislature has enacted a law that specifically exempts undeveloped designated animal and vegetation habitats for endangered and</p>	<p>SI52B-15 This comment is noted; see the Response to Comment 13.</p>



## COMMENTS

## RESPONSES

SI52B-15 cont.	<p>threatened species and dedicated Biological Open Spaces from defensible space and fuel modification regulations.</p> <p><b>Finding:</b> The Legislature exempts all bodies of water and land within a Habitat or Open Space from defensible space regulations in Very High Fire Severity Area except for limited areas around developed buildings and structures on the site.</p> <p><b>Finding:</b> Legislated statute law takes precedence over local Fire Code regulations under the State Preemption Rule; regulations codified at a local, District or County level have no legal standing when legislated law has been enacted by the State Legislature to cover the same fire and life safety matters as being of a "general State interest" applicable throughout California.</p>	
SI52B-16	<p><b>Determination:</b> The type of Open Space lots provided around the perimeter of the Project Site needs to be clearly identified to allow vegetation management practices.</p>	SI52B-16 Please refer to the Responses to Comments 12 and 13.
SI52B-17	<p><b>Section 1.2.2.1 Additional Amenities</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b>Section 2 Proposed Project Site Risk Analysis</b></p> <p><b>Section 2.1 Field Assessment</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b>Section 2.2 Site Characteristics and Fire Environment</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b>Section 2.2.1 Topography</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b>Section 2.2.2 Existing/Vicinity Land Use</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b>Section 2.2.3 Vegetation (Fuels)</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b>Section 2.2.4 Vegetation Dynamics</b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p>	SI52B-17 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.
THE JUNIPERS FIRE PROTECTION PLAN PEER REVIEW ANALYSIS		11



SI52B-17 cont.	<p><b><u>Section 2.2.5 Climate</u></b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b><u>Section 2.2.6 Fire History</u></b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b><u>Section 3 Determination of Project Effects</u></b></p> <p><b>Finding:</b> The content of FPP page 23 does not raise any content or Code compliance issues.</p>	
SI52B-18	<p><b>Finding:</b> The content of FPP Page 24 related to emergency access and existing and proposed ingress/egress routes where bollards currently or are proposed to barricaded right-of-way corridors present Code compliance issues. These will be discussed in more detail in the FPP Sections dealing with access and ingress-egress route mitigations.</p>	SI52B-18 Comment noted. This comment refers to later comments addressed in Responses to Comments 37, 65, 66, 70 and 83 below.
SI52B-19	<p><b><u>Section 4 Anticipated Fire Behavior Modeling</u></b></p> <p><b><u>Section 4.1 Fire Behavior Modeling</u></b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p> <p><b><u>Section 4.2 Behave-Plus Fire Behavior Modeling Effort</u></b></p> <p><b>Finding:</b> This section does not raise any content or Code compliance issues.</p>	SI52B-19 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.
SI52B-20	<p><b><u>Discussion:</u></b></p> <p>Wildland fire behavior calculations have been projected for the hazardous vegetative fuels on the undeveloped adjacent sites bordering the Project and inside the proposed residential development. These projections are based on “worst case” fire scenarios that could impact the project site.</p> <p>The computer-based BEHAVE-Plus modeling program can be used to develop fire behavior assessments impacting development projects.</p> <p>The BEHAVE Fire Behavior analysis can display the expected Rate of Fire Spread (expressed in feet per minute), Fire Line Intensity (Btu/ft./sec), Flame Length (feet) and anticipated downwind ember/firebrand deposits for native vegetative fuels expected in a project's climate zone. Variable inputs are slope, projected wind speed, and the anticipated weather. The analysis can also include calculation inputs obtained from project site observations and fuel levels typically observed during the local fire season.</p>	SI52B-20 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-20  
cont.

The fuel model sets currently used by fire scientists, fire behavior analysts and Fire Protection Plan consultants do not have the ability to simulate fire behavior changes created by various fuel treatments. Fuel Models are based on fully cured vegetation at or near their seasonal extinction moistures and, concurrently, at the worst part of the annual fire season. This tends to produce over-prediction of fire spread rates and other fire behavior parameters, especially in annual grass and chaparral type fuels.

#### **Section 4.3 Fire Behavior Modeling Results**

**Finding:** Table 3, BehavePlus Fire Behavior Modeling Results, raised content issues, based on the Peer Review Consultant's experience with the modeling program and its outputs for typical San Diego vegetative fuel models and climatic conditions.

**Table 3**  
**BehavePlus Fire Behavior Modeling Results**

Fire Scenario	Flame Length (feet)	Spread Rate (mph)	Fireline Intensity (Btu/ft/s)	Spot Fire (miles)
<i>Scenario 1: grass-ice plant fuels on east facing slope, 8% upslope, Peak weather</i>				
Sparse Grass (Gr1)	3.1	0.5	67	0.3
<i>Scenario 2: grass-ice plant fuels on east facing slope, 4% upslope, Peak weather</i>				
Sparse Grass (Gr1)	3.1	0.5	67	0.3
<i>Scenario 3: Mixed chaparral and sage scrub fuels on north/south facing slopes, 25%-30%% downslope; Summer weather</i>				
Chaparral (Sh5)	23.2	2.0	5,296	0.6
Coastal Sage Scrub (SCAL 18)	24.7	1.0	6,060	0.7
<i>Scenario 4: Mixed chaparral and sage scrub and chaparral on north/south facing slopes, 15%-30% downslope; Summer weather</i>				
Chaparral (Sh5)	23.5	2.1	5,403	0.6
Coastal Sage Scrub (SCAL 18)	25.0	1.1	6,205	0.7

SI52B-21

#### **Discussion**

The Peer Review Consultant performed an independent Behave-Plus fire modeling simulation, using the FPP input parameters and input parameters typical of those recommended for use by San Diego County Fire Protection Consultants.

The San Diego County fire protection modeling weather input parameters are based on weather conditions, considered to be worst case scenario for the entire County, recorded during the 2003 Cedar Fire Santa Ana wind event incident.

FPP Appendix B Table 5, Variables Used for Fire Behavior Modeling Efforts, was used by the DUDEK Team for fire behavior modeling input parameters.

SI52B-21 The comment is noted and requires no response.

**Table 5**  
**Variables Used for Fire Behavior Modeling Efforts**

Variable	Summer Weather Condition	Peak Weather Condition (offshore/Santa Ana Condition)
Fuel Models	Sh5, SCAL 18	Gr1
1h Moisture	3%	2%
10h Moisture	6%	3%
100h Moisture	8%	5%
Live Herbaceous Moisture	60%	30%
Live Woody Moisture	90%	50%
20-foot Wind Speed (upslope/downslope)	19 mph	41 mph
Wind Direction	225°	45°
Wind Adjustment Factor (BehavePlus)	0.6	0.4

The Peer Review Consultant used two scenarios, with the first duplicating the DUDEK parameters and the second using 2003 Cedar Fire-Santa Ana wind event input factors:

- Fuel Models GR-1 and SH-5
- Fuel Moistures
  - 1-hour, annual grasses – 1%
  - 10-hour fuels – 3%
  - 100-hour fuels – 5%
  - Live Herbaceous Moisture – 30%
  - Live Woody Moisture – 50%
- 20 foot Wind Speed – 30 mph, all fuels
- Wind Direction – 45 degrees
- Wind Adjustment Factor – 0.5

The BEHAVE-Plus Fire Behavior Prediction and Fuel Modeling System is a computer-based systematic method of predicting wild land fire behavior. It was developed by the U.S. Forest Service at the Intermountain Forest Fire Laboratory, Missoula, Montana, and is used by wild land fire experts and scientists nationwide.

BEHAVE-Plus is designed to predict fire spread and describes fire behavior only at the flame front of a fire.

The primary parameter of the BEHAVE fire behavior calculations are dead fuels less than one-quarter (1/4") inch in diameter that readily carry fire across the landscape.

Fuels larger than three (3) inches in diameter are not included in the BEHAVE calculations. The BEHAVE fire model describes a wildfire spreading through surface fuels, which are the burnable materials within six (6) feet of the ground and contiguous to the ground.

#### **Use of Fire Model Inputs – Caveats**

The BEHAVE-Plus Fire Behavior Model is a tool used by fire authorities to estimate the behavior of fire moving towards a structure under certain assumptions.

SI52B-21  
cont.

The Fire Behavior Model is only an *estimate* and is *not* designed to replace the experience of the local Fire Authority, who is familiar with local wildfire behavior.

The Behave-Plus fire model is not the only recognized fire model that is available; it is identified in this report only because it is the model currently used by most fire consultants.

**Comparison of Behave Plus Fire Modeling Analysis**

Fire Scenario	Flame Length	Spread Rate	Fire Line Intensity	Spot Fires
GR-1 Short Grass	2.7 feet (3.1')	0.32625 mph (0.5)	49 BTU/ft/sec (67)	0.2 miles, 98% (0.3)
SH-5 Chaparral	24 feet (23.2')	2.2 mph (2.0)	5706 BTU/ft/sec (5296-5403)	0.8 miles, 85% (0.6)
GR-1, Santa Ana	4 feet (3.1')	0.6975 mph (0.5)	115 BTU/ft/sec (67)	0.2 miles, 100% (0.3)
SH-5, Santa Ana**	35.8 feet	4.125 mph	13557 BTU/ft/sec	1.1 miles, 100%

\*\* Fuel model SH-5 Chaparral vegetation was not subjected to Santa Ana wind event weather conditions; limited to summer time fire behavior parameters

Italicized modeling outputs in parenthesis are original DUDEK values.

SI52B-22

**Finding:** With the exception of Santa Ana wind event modeling for chaparral type fuels, fire modeling output data is reasonably consistent with relatively minor variations.

**Finding:** Fire modeling output variations are most likely subject to discrete changes of input data parameters, particularly applicable slope elevation and slope vertical and horizontal distances used, which were not definitively established in the DUDEK parameters.

**Determination:** This section does not raise any detrimental content or Code compliance issues leading to the rejection of the FPP by the FAHJ.

SI52B-23

#### **Section 4.4 Project Area Fire Assessment**

**Finding:** This section does not raise any content or Code compliance issues

SI52B-24

#### **Section 5 Emergency Response and Service**

##### **Section 5.1 Fire Facilities**

SI52B-22 Comment noted. The comment identifies potential changes in modeling inputs, but also notes that the resulting model output would not differ materially with the analysis in Section 4 of the Evacuation Plan; therefore, no further response is provided.

SI52B-23 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-24 The comment identifies a need for clarification between the data provided in the Fire Station summary table and the corresponding text and does not address the adequacy of the FPP or EIR. The table indicates 4-person engine companies and the text indicates 3 firefighters per engine company. In response, the FPP has been clarified to indicate that each engine company includes three full time crew and one fire recruit. The comment also indicates that there may



Table 4  
SDFRD Fire and Emergency Medical Response to the Junipers

Fire Station	Address	Staffing	Apparatus
33	16966 Bernardo Center Drive San Diego, CA 92128	4 person engine crew; Paramedic ambulance crew	One Type I, one Type III, one Paramedic ambulance
40	13393 Salmon River Road San Diego, CA 92128	4 person engine crew with Paramedic	One Type I engine, one Type III engine, one Truck, one Light and Air, one Paramedic
42	12119 World Trade Drive San Diego, CA 92128	4 person engine crew	One Engine
44	10011 Black Mountain Road San Diego, CA 92108	4 person engine crew; BC	One Type I and one Truck; one Battalion Unit

The closest station is **FS 42** located at 12119 World Trade Drive which includes one engine staffed with **three fire fighters 24-hours** per day/seven days per week. FS 40, located at 13393 Salmon River Road, is the next closest station and staffs a minimum of **three** fire fighters 24-hours per day/seven days per week and houses an engine, a brush engine, a ladder truck a light and air unit and a Paramedic. Station 44 is the next closest SDFRD station and is located at 10011 Black Mountain Road. The station staffs **three** on-duty, 24-hours per day and houses a fire engine, a ladder truck, and a Battalion Chief unit. Station 33 is located at 16966 Bernardo Center Drive and houses a fire engine, a brush engine and a Paramedic.

SI52B-24  
cont.

When evaluated, Table 4 presents seemingly contradictory information when compared to the data provided in the narrative immediately below:

- Staffing levels in Table 4 indicate that apparatus staffing levels are four firefighters per station
- Staffing levels in the narrative indicate that each engine has a three person staffing level
- Table 4 and the narrative infers that each station is staffed by three firefighters, without taking into consideration that each apparatus (with the exception of paramedic ambulances, battalion chiefs and light-and-air support, in a multi-company station will have the same minimum staffing levels as engine companies.
- Enhanced staffing levels for multi-company stations are not clearly indicated in the narratives
- Type III Brush Engines are normally cross-staffed by either the Type I engine or Truck/Ladder Company crew assigned to a particular station

**Determination:** *The seemingly contradictory information can be resolved with clarification of the available resources and staffing within each Station.*

#### **Section 5.1.2 Estimated Calls and Demand for Service from the Project**

**Finding:** *This section does not raise any content or Code compliance issues.*

#### **Section 5.2 Response Capability Impact Assessment**

**Finding:** *This section does not raise any content or Code compliance issues.*

SI52B-25

SI52B-24 (cont.) be more than one engine company at some fire stations. For clarification, the FPP has been revised to indicate that multi-apparatus stations may include additional personnel. None of these clarifications affect the analyses or conclusions of the FPP or the EIR, Section 5.14.4.

SI52B-25 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

**Section 5.3 Emergency Response Times****Discussion:**

To confirm the response time from SDFRD Station 42 to the Project entrance, a separate response time validation analysis was conducted by the Consultant.

Three processes were used:

- Map Quest Directions request, with driving times starting at Station 42 and ending at the intersection of Penasquitos Drive and Carmel Mountain Road
- NFPA 1142 Table C-11 (b) criteria (as indicated by the County of San Diego Fire Protection Plan Guidelines document), using a safe constant maintained speed of 35 mph in light traffic and level terrain. Where conditions do not permit a constant 35 mph, the average safe speed is reduced.
- Theoretical time and distance analysis, using variable speeds

The Map Quest Directions requested produced the following data:

- Travel distance – 1.3 miles
- Drive Time in Heavy Traffic – 4 minutes

NFPA 1142 Table C-11 (b) is reproduced below:

Table C-11 (b) Time-Distance Table Using an Average Speed of 35 mph (56 km/hr)

Distance			Distance		
mi	km	Time (min)	mi	km	Time (min)
0.0	0.00	0:00	6.50	10.44	18:30
0.1	0.16	0:30	6.75	10.86	19:15
0.2	0.32	0:39	7.00	11.27	19:57
0.3	0.48	1:16	7.25	11.68	20:42
0.4	0.64	1:33	7.50	12.09	21:27
0.5	0.80	1:50	7.75	12.50	22:12
0.6	0.97	1:57	8.00	12.91	22:57
0.7	1.13	1:54	8.25	13.32	23:42
0.8	1.29	2:01	8.50	13.73	24:27
0.9	1.45	2:18	8.75	14.14	25:12
1.0	1.61	2:35	9.00	14.55	25:57
1.25	2.01	2:78	9.25	14.96	26:42
1.50	2.41	3:20	9.50	15.37	27:27
1.75	2.82	3:52	9.75	15.78	28:12
2.00	3.22	4:20	10.00	16.19	28:57
2.25	3.63	4:47	10.25	16.60	29:42
2.50	4.02	4:50	10.50	17.01	30:27
2.75	4.42	5:31	10.75	17.42	31:12
3.00	4.83	5:75	11.00	17.83	31:57
3.25	5.23	6:17	11.25	18.24	32:42
3.50	5.63	6:50	11.50	18.65	33:27
3.75	6.03	7:02	11.75	19.06	34:12
4.00	6.44	7:45	12.00	19.47	34:57
4.25	6.84	7:57			

**Finding:** A response travel time of 1.3 miles has a driving time of approximately 2.78 to 3.2 minutes.

The theoretical time-distance-speed analysis produced the following results, as depicted in the table below. Input data included a response distance of 1.3 miles, or 6864 feet, and the variable constant roads speeds of 25, 30, 35 and 40 mph.

The industry standard for dispatch time (from receipt of the initial call to transmission to a fire station) is approximately two minutes.

SI52B-26 This comment describes various methods utilized by the commenter to evaluate the accuracy of the response travel times calculated in the FPP. The result of the evaluation was consistent with the FPP and concludes no issues. No further response is necessary.

SI52B-26

The industry standard for turn-out time (time to prepare for response and departure from a fire station) ranges between one and two minutes.

Travel Speed	Distance Traveled/minute	Driving Time	Dispatch & Turnout Time (worst case scenario)	Total Response Time
25 mph	2200 feet	3.12 minutes	4 minutes	7.12 minutes
30 mph	2640 feet	2.6 minutes	4 minutes	6.6 minutes
35 mph	3080 feet	2.2 minutes	4 minutes	6.2 minutes
40 mph	3520 feet	1.95 minutes	4 minutes	5.95 minutes

*Theoretical Time-Distance Speed for Station 42 Response Times*

**Finding:** At constant safe response speeds between 30 and 40 mph, Engine Company 42 will arrive at the entrance of the Project Site in under seven (7) minutes after initial emergency call receipt.

**Finding:** Using the Theoretical Time-Distance-Speed analysis, Station 42 apparatus will achieve the City of San Diego response goal of arriving within 7-1/2 minutes for 90% of all emergency calls for service.

**Finding:** Using the NFPA 1142 Table C-11 (b) criteria, Station 42 apparatus will arrive at the Project entrance after a total response time of 7.2 minutes, meeting the City of San Diego response time criteria.

**Finding:** Using the DUDEK ISO formula response time criteria, Station 42 apparatus will arrive at the Project entrance after a total response time of 7 minutes, 10 seconds, meeting the City of San Diego response time criteria.

**Finding:** This section does not raise any content or Code compliance issues.

#### **Section 5.4 Impacts and Mitigations**

##### **Section 5.4.1 Fire Response**

In general, FPPs review if a project is in a high fire hazard severity zone or WUI, and the ramifications of such location. As noted throughout this FPP and shown on previously referenced Figure 1, the Junipers project is separated from open space by the existing Glens development and Penasquitos Drive. This issue, therefore, does not apply to the project, and no WUI-related impact would occur. The project is within ember cast from wildland fuels, and appropriate ember resistance has been designed into the Junipers building requirements.

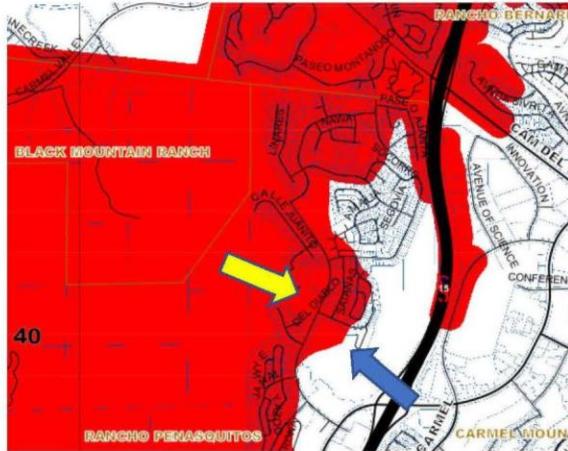
As previously discussed in the evaluation of Section 1.2.2, Project Description, limited separation of Project lands and ember shower distance from the Black Mountain Open Space unmanaged vegetative fuels (yellow arrows), results in the northwest corner (blue arrows) of the development being designated as a Very High Fire Severity Area.

SI52B-26  
cont.

SI52B-27

SI52B-27 Comment noted. No comments on the Draft EIR, FPP or Evacuation Plan, or issues with the project's analysis are raised within this comment and therefore, no response is provided.





The National Fire Protection Association and US Forest Service define a Wildland-Urban-Interface Area as a place where humans and their development meet or intermix with wildland fuels. Communities that are within one-half mile of unmanaged natural vegetation fuel beds are included within this definition.

WUI Areas are further sub-divided into two categories:

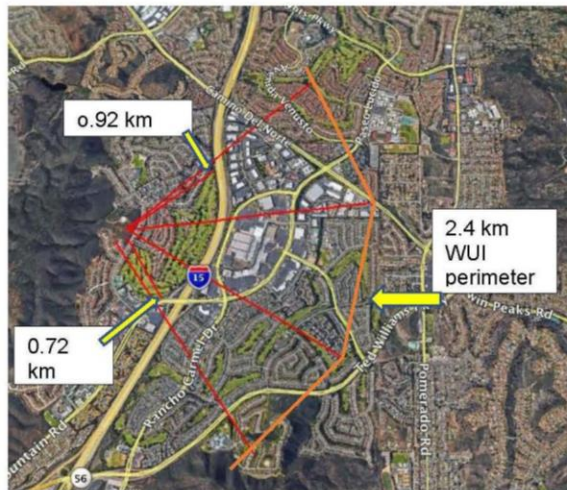
1. Intermix Areas where lands have at least one housing unit per 40 acres where the vegetation occupies more than 50% of the land area. A heavily vegetated intermix

SI52B-27  
cont.

area has vegetation covering more than 75% of the land area. Buildings are surrounded by vegetative fuel beds.

2. Interface WUI where lands have at least one housing unit per 40 acres and the vegetation occupies less than 50% of the land area. Homes in the interface WUI are adjacent to heavy vegetation, with varying degrees of separation.

The Federal Register and the California Fire Alliance indicate that WUI Interface areas that have at least 6.17 housing units per square kilometer within 2.4 kilometers of a vegetative fuel bed that covers 50% or more of the landscape. The 2.4 km distance is an estimated, generalized distance that a fire brand can be deposited ahead of an active fire front.



SI52B-28

Using the Google Earth measuring tool, a 2.4 kilometer perimeter was overlaid on the satellite image of the Project Site and the lands surrounding it.

The southeast corner of the Project Site is approximately 0.72 kilometers from the Black Mountain Open Space exposure at the intersection of Del Diablo and Penasquitos Drive.

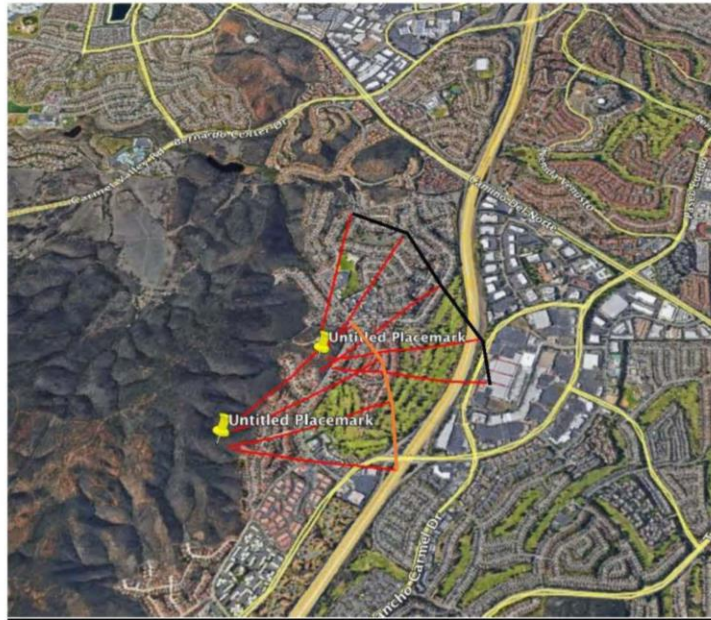
The northeast corner of the Project Site is approximately 0.92 kilometers from the Black Mountain Open Space exposure at the intersection of Del Diablo and Penasquitos Drive.

#### **Ember Deposition in The Glens and The Junipers Sub-divisions**

The potential for ember shower/fire brand deposition within The Glens and The Junipers sub-divisions were performed using two foreseeable fire events occurring within the adjacent Black Mountain Open Space lands.

SI52B-28 The comment provides an analysis of ember cast from Black Mountain Ranch onto the project site and discusses the vegetation ignition potential. However, the comment confuses the project's post-construction landscape with natural open space areas in terms of vegetation ignition. As explained in Section 3 of the FPP, burning vegetation embers may land on project structures, but are not likely to result in ignition based on ember decay rates and the types of non-combustible and ignition resistant materials that will be used on site. As discussed in Section 5.14.3.2 of the EIR, the FPP evaluated the potential for embers as the primary threat to future project residents and property and as such, recommended that all buildings be constructed to the latest ignition resistant levels and that all project landscaping be designed to be fire-resistive.

SI52B-28  
cont.



*0.6 Mile Ember Shower Zone from Black Mountain Open Space Fires*

Both of these fire scenarios were evaluated using the less conservative DUDEK BEHAVE-Plus fire modeling results, which did not measure the number of potential ignitions in receptive downwind vegetation.

Fire Scenario # 1 is a wild fire burning in a southwest to northeast direction under the influence of normal summer afternoon wind patterns. The fire is located mid-slope on the east aspect of the mountain side overlooking the western side of Janal Way and west of Penasquitos Drive.

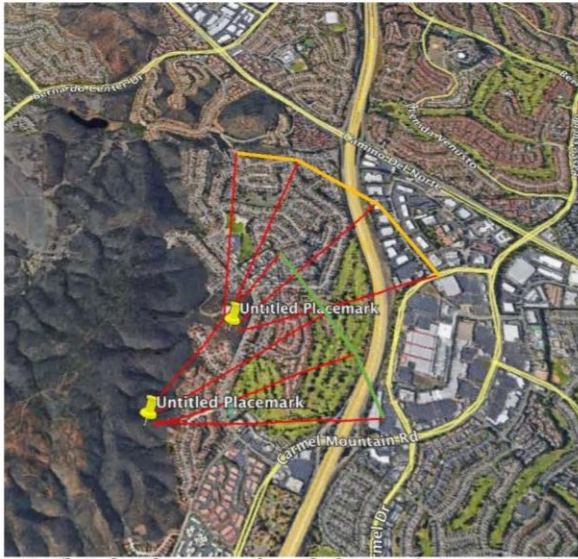
Fire Scenario # 2 is a wild fire burning in a southwest to northeast direction under the influence of normal summer afternoon wind patterns. The fire is located mid-slope on the east aspect of the hillside overlooking Penasquitos Drive at its intersection with Del Diablo Street.

The DUDEK fire modeling output parameters for ember shower/firebrand deposition indicates that burning materials lofted by a flame front's convective air patterns will land 0.6 downwind of the fire line burning through vegetative fuels, based on inputted fuel moisture, weather and wind speed.



The Consultant, using DUDEK's environmental data, performed a fire modeling run that indicates a downwind fire brand deposition distance of 0.8 miles from the fire front, with 85% ignitions occurring in receptive vegetation.

The ignition potential of 85% indicates that deposition of fire brands in downwind vegetation will result in 85 fire brands out of 100 fire brands lofted into the area will cause active fires requiring Fire Department intervention for suppression and control.



0.8 Mile Ember Shower Zone from Black Mountain Open Space Fires

**Determination:**

Analysis indicates that major areas of The Glens and The Junipers sub-division areas are within both the 0.6 mile and 0.8 mile downwind firebrand deposition zone from wild fires originating in the northeastern areas of the Black Mountain Open Space Area.

**Finding:** The Project is in a Wildland Urban Interface area and portions of the Project Site are in a City of San Diego designated Very High Fire Severity Area.

**Finding:** Portions of the existing pre-development Project lands are currently covered with combustible vegetation, primarily light and flashy annual grass fuels. This is a WUI exposure to the neighboring single family dwelling neighborhoods.

SI52B-29 The comment provides a distance measurement that is accurate, but raises no issues with the FPP analysis or conclusions and therefore, requires no response.

SI52B-30 The comment is noted, but does not conflict with the FPP. FPP Section 1.1 states that a portion of the project is within an area designated as a VHFHSZ. Again in Section 5.4.1, the FPP states most of the project site has not been placed into a VHFHSZ (meaning portions of it have been designated VHFHSZ). For clarification, a definition of Wildland Urban Interface (WUI) has been added to the FPP and the inclusion

## COMMENTS

## RESPONSES

	<p>SI52B-30 (cont.) of the project site within a more general WUI has been acknowledged (Section 5.4.1). This clarification does not change the FPP approach or conclusions. The project is not located within 100 feet of wildland vegetation, but is proposed to incorporate fire-resistant landscaping. Buildings would be built to the California Fire Code (CFC) Chapter 7A ignition resistant standards. Please also refer to the response to Comment 7 for additional discussion.</p> <p>SI52B-31 Comment noted. The comment accurately describes the existing project site's vegetation as flashy fuel that presents a current wildfire risk to neighboring properties. The project will improve upon this existing condition by providing fire resistant structures and landscaping throughout the site, as described in the EIR and FPP.</p>
--	--

## COMMENTS

## RESPONSES

SI52B-32	<b>Finding:</b> With development, the combustible grasses on the Project Site will be type-converted to Fuel Model NB-1, Non-burnable Urban Developed, which will not support active wild fire spread.	SI52B-32	Comment noted. The comment is consistent with the FPP, noting that the currently burnable landscape will be converted to a fire resistant landscape with the project completion.
SI52B-33	<b>Finding:</b> Fires originating on the Black Mountain Open Space in unmanaged vegetation near the intersection of Penasquitos Drive and Del Diablo will, under normal typical summer time southwest wind patterns, direct wildfires away and to the northeast of the Project Site, as indicated in the FPP fire behavior narrative.	SI52B-33	Comment noted. The comment provides concurrence with the FPP's evaluation of Black Mountain Open Space wildfire starts during typical summer weather and does not raise an issue with the analysis or conclusions of the FPP or EIR; no response is required.
SI52B-34	<b>Finding:</b> Fires originating on the Black Mountain Open Space in unmanaged vegetation near the intersection of Penasquitos Drive and Del Diablo will, under typical Santa Ana wind event patterns direct wildfires away and to the southwest of the Project Site, as indicated in the FPP fire behavior narrative.	SI52B-34	Comment noted. The comment provides concurrence with the FPP's evaluation of the behavior of Black Mountain Open Space wildfire starts during Santa Ana wind conditions and does not raise an issue with the analysis or conclusions of the FPP or EIR; no response is required.
SI52B-35	<b>Determination:</b> The narrative omission of designating the Project Area inside of a recognized Wildland Urban Space and the City of San Diego designated VHFSA, is a potentially significant Code compliance and design issue.	SI52B-35	Comment noted. The FPP analysis addresses the project location within VHFHSZ and WUI designated areas. Please refer to the Responses to Comments 7 and 30.
SI52B-36	<p><b><u>Section 6 Fire Safety Requirements</u></b></p> <p><b><u>Section 6.1 Roads</u></b></p> <p><b><u>Section 6.1.1 Access Roads</u></b></p> <p>The opening paragraph of the Access Road narrative indicates the Project will provide emergency egress from and to specified streets, emergency only access routes and an emergency fire access road that can be used for resident evacuation purposes.</p> <p><b><u>Discussion:</u></b></p> <p>Reliance on restricted emergency egress routes is problematic from two perspectives:</p> <ul style="list-style-type: none"> <li>• Fire-related human behavior characteristics</li> <li>• Resource allocation limitations during emergency events</li> </ul> <p><b><u>Fire-Related Human Behavior</u></b></p> <p>Research has been performed to understand the effects of stress on emergency evacuation behavior. Stress during an emergency can be brought on by several different complex conditions or states. Other than the obvious threat from physical harm, fires can cause other conditions or states including uncertainty/ambiguity, information overload and time pressures.</p> <p>Uncertainty for residents can occur because of:</p> <ul style="list-style-type: none"> <li>• Missing information</li> <li>• Unreliable information – actual or perceived</li> </ul>	SI52B-36	Comment noted. The comment accurately summarizes the opening paragraph of FPP Section 6.1.1. Because it does not raise an issue with the analysis or conclusions, no response is provided.
SI52B-37		SI52B-37	Public reaction to emergency evacuation in San Diego County and throughout California has proven over multiple events that evacuations are successful and the public respond in predictable ways. Section 6.4 of the Evacuation Plan provides research countering that referenced in the comment. Orderly movement of people is the result of planning, training, education, and awareness, all of which are promoted in San Diego and throughout San Diego County.



SI52B-37  
cont.

- Ambiguous or conflicting information – more than one interpretation of facts is presented

Information overload occurs when an individual or group perceives that there is too much information to filter in the time available. Information overload is also related to time pressures.

Time pressure causes residents to think that their situation is urgent and that they have only a limited amount of time to perform certain actions.

All of these conditions become stressors, leading residents to feel a physical state of stress or anxiety. To experience acute stress, some of the stressors must be present and the person must be aware of their stress and be motivated to resolve the situation, yet they remain uncertain about the eventual outcome.

One of the major ways stress impacts evacuation decision-making by narrowing the individual's perceptive fields. Stress makes it more difficult to perceive cues from the environment and individuals only pay attention to a limited number of cues. This causes them to miss important pieces of information about the event that are needed to insure safer and make more effective decisions.

Another effect of stress on behavior and decision making is the people are more likely to make less risky decisions, which increases the recognized behavior trait *that people use familiar exits instead of less known or unknown exit pathways during emergency events*.

Research has also been performed on the influence of the built environment on evacuation behavior.

Jonathon Sime performed much of this work, which relates to the Affiliative Model, where people will use those exits that are familiar to them before an emergency event comes into existent. Sime, through his research, also found that people attempt use the exit route that is the same used for entry into the premises. *The Affiliative Model also predicts that if an egress route is **not used in regularly and repeatedly**, and thus unfamiliar to the general population, it is less likely to be used during fire evacuations.* Therefore, people will prefer to use the most familiar egress driving routes and this is exacerbated during emergencies.

SI52B-38

Other Sections of the FPP indicate that the emergency egress points will be provided with removable barricades or gates that must be moved, or controlled, by either police officers, fire department resources or representatives of The Juniper's Home Owner's Association (HOA) to allow access to these exit points during emergency events.

Reliance on law enforcement or fire resources to open egress points does not take into consideration resource limitations and availability to perform logistical support functions during dynamic and rapidly evolving emergency incidents.

SI52B-37 (cont.) See Section 6.2 of the FPP and Section 6.4, *Social Aspects of Wildfire Evacuation*, of the Evacuation Plan for additional information.

Technological advancement for evacuation planning and management have been deployed throughout San Diego County and the result is a system that operates efficiently and deploys personnel where they are needed to maintain traffic flow from higher threat areas to lower threat areas. The inclusion of gates and bollards for some evacuation routes at the project is not a new or precedent-setting condition. Gated and bollarded routes currently exist throughout the City and are important for limiting the potential that evacuating residents inadvertently drive into an encroaching wildfire. Per the City's fire code, the SDFRD controls the gates for the evacuation routes, consistent with the current condition.

SI52B-38 As indicated in Response to Comment 37, SDFRD has mandated control of emergency fire apparatus access routes, including the route between Andorra Way and Corte Raposo. During a large event, like that described in the comment, a robust response working through an Incident Command System would be in place and corresponding evacuations would occur through a coordinated effort.

## COMMENTS

## RESPONSES

<p>SI52B-39</p> <p>Using HOA representatives to open egress points are similarly problematic because of:</p> <ul style="list-style-type: none"> <li>• Specific persons must be designated to perform these functions</li> <li>• The representative must be available 24-7-365 to perform the assigned task(s)</li> <li>• HOA representatives are not authorized to possess or use City of San Diego Knox keys or key switches</li> <li>• Removing of bollards may require physical strength that HOA representatives may have or will continue to possess as they age</li> <li>• HOA representatives, under high stress and dynamic wild fire events, may evacuate prior to opening bollards or other restrictions, based on their perception of the events unfolding around them.</li> </ul>	<p>SI52B-38 (cont.) As discussed in Section 6.2 of the FPP, switches for gates will be dual-keyed, KNOX key switches for SDFRD and Law Enforcement access, and can be remotely activated by SDFRD. The comment provides hypothetical situations and is speculative in nature. Historical evacuations in San Diego County and throughout California provide ample evidence that successful and safe evacuations are the normal condition. Please also refer to the below Response to Comment 39.</p>
<p>SI52B-40</p> <p><b>Determination:</b> Specific issues related to emergency egress routes will be analyzed in those Sections related to their use or design.</p>	
<p>SI52B-41</p> <p><b>Page 37, Roundabouts</b></p> <ul style="list-style-type: none"> <li>• Roundabouts are proposed along Penasquitos Drive at Janal and at three locations within the Juniper Project.</li> </ul> <p>The U.S. Department of Transportation, Federal Highway Administration defines a roundabout as a type of circular intersection that is different from a neighborhood traffic circle or large rotary intersection. Regardless of size, shape or number of traffic legs, roundabouts have fundamental and essential characteristics that include:</p> <ul style="list-style-type: none"> <li>• Counterclockwise flow direction around a center island</li> <li>• Entry Yield Control where vehicles entering the roundabout yield to the traffic already in the circulating in the roundabout</li> <li>• Low Speed that results of driving speeds in the 15 to 25 mph range throughout the roundabout</li> </ul> <p>Roundabouts reduce the types of intersection crashes by lowering the speed of vehicles moving through an intersection and reducing the number of potential conflict points within the intersection. A typical "tee" intersection has thirty-two (32) conflict points; in contrast, a roundabout only has eight (8) – four (4) merging and four (4) diverging. In addition to reduction of conflict points, the remaining conflicts remain in the same direction variety, which results in substantially less severity and less likelihood of injury.</p> <p>A research project published in December 2000 (and authorized by the State of California), <i>Emergency Response – Traffic Calming and Traditional Neighborhood Streets</i> provides guidance on the different types of traffic calming solutions, average response time delays and the appropriate locations for the different types of traffic calming solutions. Those applicable to the proposed street design for The Junipers development are discussed below.</p>	<p>SI52B-39 Please note that it is not anticipated that Junipers HOA members would have the ability to open gates and bollards associated with emergency egress routes. This has been clarified in the FPP and Evacuation Plan. During wildfire emergencies, there will be significant resources between fire and law enforcement agencies to open bollards and gates, if needed. There are also other agencies that work under the unified command system that would be available and could also be deployed to open gates and bollards.</p> <p>SI52B-40 Comment noted. Those comments are addressed below as they occur.</p> <p>SI52B-41 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.</p>
<p>SI52B-42</p> <p><b>Mini-Roundabouts</b></p>	<p>SI52B-42 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.</p>

SI52B-42  
cont.

Mini-roundabouts are best used in neighborhoods and small commercial settings, with all entries under yield control.

Emergency responders must slow down to negotiate mini-roundabouts but, in contrast to stop control, the delays are minimized (three to six seconds), especially when responders have slowed down while attempting to locate addresses on buildings on local neighborhood streets.

Center islands may be provided with mountable curbs, allowing large vehicles to turn across the face of the roundabout.

#### Roundabouts

Research indicates that full-sized roundabouts are the most effective new tools for improving intersection safety and traffic flow rates.

However, there is some controversy about a roundabout's effectiveness in preventing response delays. The average response delays range from between two-to-six seconds up to twelve-to-fifty seconds, depending on roundabout design and traffic flow conditions.

Some roundabouts improve response times by eliminating stacking of vehicles at intersections controlled by traffic lights. In one jurisdiction, quarter-mile long traffic backups at light-controlled intersections with wait times of an hour were reduced to stack lengths of no more than six cars.

In general, emergency response delays are most encountered when attempting to make left turns across roundabout calmed intersections. These delays create an additional wait time of up to ten seconds or less.

Most roundabouts are provided with truck aprons (mountable curbs) so that the rear wheels of large/long fire apparatus can be accommodated.

Full-sized roundabouts work in a variety of settings but most are being placed on:

- Wide local streets
- Collectors and arterial roads carrying more than 25,000 vehicles per day
- Gateway entries to downtowns, neighborhoods and commercial districts

Roundabouts are generally first located in towns and villages on roads with an average 20,000 vehicle trips per day. Once drivers are used to them, two-lane roundabouts can be applied to intersections with as many as 50,000 vehicles per day.

SI52B-43

The Juniper-Glens Evacuation Plan diagrams and the Project's street design map indicate the presence of proposed four (4) internal roundabouts, with one off-site roundabout located on Penasquitos Drive at its intersection with Private Street "A."

SI52B-43 The comment is accurate that there are four total proposed roundabouts, but is inaccurate that there are four internal roundabouts. In fact, Figure 2, *Project Site Plan*, of the FPP indicates that there are three internal roundabouts and one off-site roundabout. The comment is confusing the modified cul-de-sac with a fourth internal roundabout. The modified cul-de-sac is intended to serve as a turnaround for the



SI52B-44



The Junipers development FPP and Evacuation plan indicates that approximately 536 new residences, with 911 persons, will be built on the Project site. For The Glens and The Junipers residential areas, a total of 4082 vehicles would be considered as the evacuation loading for the existing and proposed street system(s). The worst case scenario, which includes other residential, educational, assembly and commercial occupancies raises the number of evacuating vehicles to 5232.

SI52B-43 (cont.) recreation center and does include a bollarded emergency evacuation route on its north end, but there will not be additional traffic utilizing this stretch on a daily basis as would be the case with a roundabout. However, the FPP has been revised to clarify the modified cul-de-sac to eliminate confusion.

SI52B-44 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-45

**Table 1**  
**The Existing Glens Community Roadway and Freeway Estimated Vehicle Capacities**

Roadway	Segment	Estimated Roadway and Freeway Capacity <sup>a</sup>				
		East	West	North	South	Total
Interstate I-15 <sup>b</sup>	North and south of Carmel Mountain Road			10,000	10,000	20,000
State Route 56	West of I-15	4,000	4,000			8,000
Carmel Mountain Road	East of I-15	3,000	3,000			6,000
Carmel Mountain Road	West of I-15	3,000	2,000			5,000
Penasquitos Drive	Almazan Road to Carmel Mountain Road			1,000	1,000	2,000
Black Mountain Road	Carmel Mountain Road South or north to Carmel Valley Road			2,000	2,000	4,000
Carmel Valley Road/Bernardo Center Drive	Black Mountain Road to Camino Del Norte			2,000	2,000	4,000
Camino Del Norte	Bernardo Center Drive to I-15	3,000	3,000			6,000
Paseo Montanoso	Corte Raposo to Camino Del Norte			500	500	1,000
Almazan Street	Andorra Way to Penasquitos Dr.			500	500	1,000
Del Diablo Street	Del Diablo Way to Penasquitos Dr.			500	500	1,000
Del Diablo Way/Andorra Way	Penasquitos Dr to Paseo Montanoso (with connection)			500	500	1,000

Table 1 of The Glens-The Junipers Evacuation Plan provides information about estimated average daily traffic capacity for various streets in the immediate area of the Project Site. Excluding Interstate 15 and SR-56, the largest road capacities are:

- 6000 vehicle trips per day on Camino del Norte
- 5000 vehicle trips per day on Carmel Mountain Road

SI52B-46

**Finding:** With the exception of Penasquitos Drive (2000 ADT), none of the internal residential streets within the existing development areas exceed 1000 ADT

SI52B-47

**Finding:** The Junipers development, with 536 new residents, with a conservative estimate of two cars per home, will likely produce an additional load of 1070 vehicles on the existing road system.

SI52B-48

**Finding:** The average width of streets within The Junipers development is twenty-four (24') feet, which is not considered to be a "wide" neighborhood street.

SI52B-49

**Finding:** The minimum fire apparatus access road-neighborhood street curb-to-curb improved width measurement is twenty (20') feet.

SI52B-50

**Finding:** Based on the Emergency Response – Traffic Calming and Traditional Neighborhood Streets guidelines, with less than 20,000 ADT street capacities, full-size or mini roundabouts do not appear to be justified either inside of The Junipers development or on Penasquitos Drive at the Private Street A intersection.

SI52B-51

**Finding:** There is a conflict between the narratives of the FPP and Evacuation Plan – the narratives indicate that there three (3) roundabouts inside The Junipers development area; the street design maps show four (4) roundabouts.

SI52B-45 The comment indicates that the vehicle capacities in Table 1 represent vehicle trips per day. In fact, the vehicle capacities are representative of the total number of vehicles per hour for respective project area roads that may be utilized during an evacuation, as indicated in Footnote 1.

SI52B-46 Please refer to Response to Comment 45. The table in the FPP identifies vehicles per hour, per lane, and not daily traffic. This is explained in Footnote 1 of Table 1.

SI52B-47 The comment inaccurately summarizes the estimated evacuation vehicles anticipated from the project at 1,070. This is very close to the actual number utilized in the evacuation calculations, which is 1,072 (2 vehicles per residence), as discussed in Section 4.2, *Roadway Capacities and Evacuation Time Estimates*, of the Evacuation Plan. Note that using 2 vehicles per residence is a conservative estimate for the project, as many residents will leave in the same vehicle and others may not be present at the time of an evacuation.

SI52B-48 The internal project driveways will all meet the latest applicable fire codes for width, providing a minimum of 24 feet (two 12-foot wide travel lanes) of unobstructed travel.

## COMMENTS

## RESPONSES

	<p>SI52B-49 The project would incorporate 12- to 13-foot wide travel lanes throughout, along the internal project driveways. Only utility maintenance roads would be 20 feet in width.</p> <p>SI52B-50 The City's <i>Street Design Manual</i> (2017) and <i>Traffic Calming Toolbox</i> (2006) identify roundabouts as acceptable within the City for all types of streets. These City guidance documents indicate that roundabouts can be effective for controlling vehicle speed and reducing traffic volumes and collisions. Roundabout designs are site specific and are reviewed and approved by City staff. The design concepts for the proposed roundabouts have been reviewed and approved by City Engineering and FRD staff and will continue to be reviewed through final design.</p> <p>SI52B-51 Please refer to the Response to Comment 43.</p>
--	---



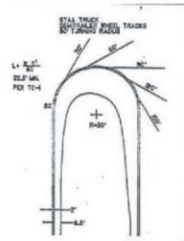
SI52B-52



The City of San Diego Fire Prevention Bureau Policy for Fire Apparatus Access Roads (A-14-1) indicates that:

1. A minimum turning radius of fifty (50') feet is required and shall be in accordance with the semi-trailer template from the currently adopted Fire Code.
2. Inside measurement shall be according to the California Semi-Trailer Wheel Tracks
3. An additional two (2') feet of width shall be provided to allow for clearance of apparatus bumper overhangs.

SI52B-52 Please refer to Response to Comment 43 regarding the inclusion of three vs four internal roundabouts. Regarding the inside and outside turning radii for roundabouts, the proposed roundabouts will meet the code requirements, including conformance with CFC Section 503 and City FPB Policy A-14-1 "Fire Access Roadways," with an inscribed circle radius of 50 feet and an inside paved truck apron with rolled curb. For clarification purposes, the FPP has been revised to indicate that the proposed roundabouts will meet SDFRD requirements (Section 5.3).

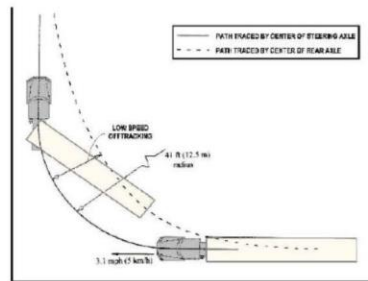


*Excerpt from SDFD Appendix B Drawing # FHPS-101 for 50' Turning Radius*

While not generally assigned to the northern portions of the City of San Diego, the Fire Department does have a number of tractor-drawn aerial ladders that can potentially respond on greater alarm fires to the Project Area.

Roundabouts encourage low-speed entry into and negotiation through the traffic calming system. When a combination vehicle, such as a tractor-drawn aerial ladder apparatus makes a low speed turn, the wheels of the rearmost trailer axle can follow a path that is several feet inside of the tractor steering axle. This is called low-speed off-tracking. This phenomenon is usually corrected in the design of the tractor-drawn-tiller aerial ladder, where the tillerman at the rear of the vehicle can steer the rear axle wheels for tighter turning in congested spaces. However, with a "straight" or single length aerial ladder apparatus, more common in the northern areas of the City, this steering accommodation is not present.

Excessive low speed off-tracking may make it necessary for the driver of a "straight" aerial ladder apparatus to swing wide into adjacent lanes to avoid climbing inside curbs or to avoid striking fixed objects or other vehicles. When negotiating roundabouts, excessive low speed off-tracking can result in an aerial apparatus tracking inward onto the shoulder or up over inside curbs. In general, longer wheel bases worsen low-speed off-tracking.



SI52B-53 The comment is noted, and accurately indicates that it is unlikely that a tractor-drawn aerial ladder would be utilized on the project site. There are no buildings that exceed the maximum height requiring a ladder truck. The remainder of the comment provides a summary of tractor-drawn aerial ladder maneuvering, which is noted, but does not raise any issues with the FPP's analysis or conclusions.

The diagrams below indicate the outside diameter measurement of some of the proposed roundabouts inside of The Junipers development. However, the diagrams do not indicate if these designs comply with the 50 foot turning radius requirement as specified in the SDFD Access Road Policy.



*Roundabout at Private Street "A"*



*Roundabout at Private Street "V"*

SI52B-54 Please refer to the Response to Comment 52. The proposed roundabouts have been designed to comply with SDFRD roundabout policies regarding inside and outside turning radii, rolled curbs, and general accessibility for large vehicles.

SI52B-54  
cont.

Roundabout at Private Street "P" – no measurement scale provided for diagram

SI52B-55

Section 503.4.1 of the California Fire Code, as adopted by the City of San Diego, states that "... Traffic calming devices shall be prohibited unless approved by the Fire Code Official."

**Finding:** The FPP does not provide affirmative acknowledgements or indications that the San Diego City Fire Marshal has approved the concept of installing either mini- or full sized roundabouts on streets within and outside The Juniper's project area.

SI52B-56

**Finding:** The remainder of the information presented on Page 37 does not raise any content or Code compliance issues.

#### **Section 6.1.2 Secondary Access**

The secondary access proposed for the Project has a number of deficiencies and relies upon "emergency egress only points", which have been shown by fire-related human behavior research to be inadequate if not used on a repeat, daily basis.

SI52B-57

On Page 47, the FPP refers to identifying roads and structures by complying with CFC Section 96.1.505.

Section 96.1.505 is a County of San Diego amended and adopted section of the California Fire Code and incorporated into the San Diego County Consolidated Fire Code (SDCCFC). The SDCCFC is not applicable in the jurisdictional boundaries of the City of San Diego, as the City has adopted and amended its own municipal fire code.

SI52B-55 The approval of the roundabouts was provided on the conceptual engineering drawings. The FPP presents the accepted roundabout conditions. To clarify, the FPP has been revised to indicate that the roundabouts meet the requirements of SDFRD and have been accepted as designed.

SI52B-56 Comment noted. No response is required.

SI52B-57 As the comment notes, Section 96.1.505, regarding dead-end road lengths, is from the California Fire Code and the County of San Diego Code, and has not been adopted by the City of San Diego. The analysis of dead-end road length maximums has therefore been eliminated from the FPP, and replaced with the following statement: "Dead end roads and secondary access are provided to the satisfaction of the SDFRD." Refer to Section 6.1.2, *Secondary Access*, of FPP.



If the FPP predicates enforcement of select SDCCFC prescriptive regulations on one topic for a City project, one must conclude that other SDCCFC regulations on different but related topics have been incorporated into the document, particularly as related to fire department access.

SDCCFC Section 96.1.503.1.3 and 503.1.2 regulate requirements for dead-end roads and the provision of secondary access when the limitations for a dead-end road have been exceeded.

**Sec. 503.1.2 Additional access.** The fire code official is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access. When additional fire apparatus access roads are necessary as mitigation for the exceedance of the maximum allowable dead-end road length, the additional fire apparatus access road must be remote from the primary fire apparatus access road.

**Sec. 503.1.3 Dead-end roads.** The maximum length of a dead-end road, including all dead-end roads accessed from that dead-end road, shall not exceed the following cumulative lengths, regardless of the number of parcels served:

ZONING FOR PARCEL SERVED BY DEAD-END ROAD(S)	CUMULATIVE LENGTH OF DEAD-END ROAD(S)
Parcels zoned for less than 1 acre	800 feet
Parcels zoned for 1 acre to 4.99 acres	1,320 feet
Parcels zoned for 5 acres to 19.99 acres	2,640 feet
Parcels zoned for 20 acres or larger	5,280 feet

When analyzed, based on parcel size, the FPP states that the maximum length of dead end road length in The Junipers Project is 800 feet. It further states that there are no dead end cul-de-sac lengths in these areas that will exceed 800 feet:

- The longest dead-end road (cul-de-sac) allowed by the CFC and CCR Title 14 varies by phase and lot size minimums. Maximum dead end road length in Junipers Project is 800 feet. No dead-end cul-de-sac lengths in these areas will exceed 800 feet.

The FPP further references CCR Title 14's prescriptive requirements for secondary access, which mirror the SDCCFC regulations with the clause, "... including all dead-end roads accessed from that dead end road ..." as found in section 1273.09.

#### 1273.09. Dead-End Roads

(a) The maximum length of a dead-end road, including all dead-end roads accessed from the dead-end road, shall not exceed the following cumulative lengths, regardless of the numbers of parcels served:  
 parcels zoned for less than one acre – 800 feet  
 parcels zoned for 1 acre to 4.99 acres – 1320 feet  
 parcels zoned for 5 acres to 19.99 acres – 2640 feet  
 parcels zoned for 20 acres or larger – 5280 feet

All lengths shall be measured from the edge of the roadway surface at the intersection that begins the road to the end of the road surface at the intersection that begins the road to the end of the road surface at its farthest point. Where a dead-end road crosses areas of differing zoned parcel sizes, requiring different length limits, the shortest allowable length shall apply.

SI52B-57 (cont.) Please note that the prior dead-end road analysis was intentionally included to demonstrate substantial conformity with the very restrictive Title 14 and SDCCFC requirements, although it was understood that these codes did not apply to the project. The presumption that other analyses within the FPP address County rather than City codes, or that demonstrated conformance with one County requirement means the project must comply with all County requirements, is not accurate. City of San Diego access requirements apply, and were thoroughly reviewed prior to preparation of the FPP in consultation with SDFRD. The project plans have been reviewed and vetted by SDFRD.

The commenter's description of the City adopted code requirements for additional access is accurate and applicable. These requirements are less restrictive than Title 14 and County Consolidated Code requirements and the project is consistent with the City requirements. For clarification purposes, the FPP has been revised in Section 6.1.2 to remove the Title 14 and Consolidated Code comparison and instead focuses on the City's code requirements and documents that the project is fully compliant.

SI52B-57  
cont.

As quoted and referenced by the FPP, CCR Title 14 is the California Board of Forestry and Fire Protection's SRA Fire Safe Regulations, as found in Division 1.5, Chapter 7 Fire Protection and Subchapter 2, SRA Fire Safe Regulations.

**Finding:** *SRA lands are those geographical areas within the State of California in which CAL-FIRE has primary responsibility for suppressing wild fires.*

**Finding:** *The Project Area is not mapped as being SRA by the State of California; it is mapped as a LRA or Local Responsibility Area. The local fire department has primary responsibility for suppressing wild fires.*

**Finding:** *CCR Title 14 also does not apply to the Project Area.*

**Discussion:**

Pursuant to the CFC as adopted and amended by the City of San Diego, and considering SDCCFC and CCR Title 14 specifications that have been applied to the Project Site by inclusion in the FPP, the following prescriptive regulations would apply to Secondary Access to the Project Site:

1. When a *single* fire department access road, used for Project ingress and egress purposes for both firefighting resources and residents, has the potential for impairment due to vehicle congestion, terrain, climatic conditions or other factors that could limit access, the Fire Marshal is authorized to require additional fire access and evacuation routes. *This is the base line CFC requirement, which the City of San Diego has not modified.*
2. When additional fire apparatus access roads are needed for mitigating overlength fire apparatus access roads, the additional roads must be remote from the primary fire apparatus access road. *This is the CCR Title 14 and SDCCFC requirements.*

The placement of additional access roads is at the discretion of the local Fire Marshal but the key points are that 1) these roads must have a certain degree of remoteness from each other; and 2) the additional roads are provided within the footprint of the proposed development site and connected to existing (or additional) off-site roadways providing two or more directions of evacuation travel from the area.

Fire Marshals, using their discretionary powers, evaluate secondary access remoteness in a manner similar to the analysis applied to the remoteness of exits in buildings and the application of the Common Path of Exit Travel rule where the access road connections to off-site intersections with two directions of evacuation travel.

Overview of Secondary Access Issue, Overlength Roads



At the intersection where the final dead-end street measurement begins, an emergency egress road to Del Diablo, with an east to west configuration, has been proposed. For unobstructed emergency access, a gated emergency egress point requiring human intervention to operate, is not Code compliant for secondary access, especially when

residents, unused to using the access point on a daily basis, are prone not to travel to and through it under emergency evacuations.

The spine road north of the intersection leading to the gated emergency egress point is considered to be a dead-end street according to the prescriptive definition published in CCR Title 14: "... *Dead-end road: A road that has only one vehicular ingress/egress, including cul-de-sacs **and** looped roads ...*"

CCR Title 14 and the SDCCFRC give further prescriptions of a dead-end street that includes any other dead-end streets (including looped streets per CCR Title 14) that branch off of the main dead-end street) that are accessed from the primary dead-end road.

Measurements for the length for all dead-end roads within a Project Site begin at the curb line at the beginning of the primary dead-end road at an intersection with a roadway right-of-way providing two (2) directions of evacuation travel. From this point, the primary dead-end road, and all intersection dead-end roads, including looped roads, inside of the Project site are measured to the end of the road surface at the farthest point of the dead-end roads.

A minimum of four (4) looped residential streets connect with the main spine road in this vicinity, either north of the intersection or directly to the intersection on its east side.

There are two additional dead-end cul-de-sacs on the eastern side of the project beyond the spine roads northernmost roundabout.



The northern most cul-de-sac on the eastern side of the Project Site has the following dead-end measurements:

- From a northern approach – 2170 feet from the roundabout to the cul-de-sac terminal bulb
- From a southern approach – 976 feet the roundabout to the cul-de-sac terminal bulb

#### Overview of Secondary Access Issue – Remoteness of Secondary Access Points

Following the principles enumerated in Section 1007 of the California Building and Fire Codes, when two or more secondary access points are required from a Project development site, they should be placed an equal distance apart of not less than one-half of the maximum overall diagonal dimension of the Project site area to be served, measured in a straight line between the access points.



**Finding:** On a northeast to southwest diagonal line through the Project Site, two of the three egress pathways are on the west side of the diagonal (GREEN line).

**Finding:** If the northeast to southwest diagonal line is adjusted slightly to the east, two of the three egress pathways are on the east side of the diagonal (BROWN line).

SI52B-57  
cont.

**Finding:** The proposed access ingress and egress points, based on diagonal distance separation and remoteness comply with principles of remoteness.



SI52B-57  
cont.

The physical separation distances between the ingress-egress points were measured and established as:

- Del Diablo to Carmel Valley Road – approximately 2799.56 feet
- Carmel Valley Road to Penasquitos-Private Street A intersection – approximately 1398.87 feet
- Penasquitos/Street A to Del Diablo – approximately 2525.58 feet

The averaged separation distance between Del Diablo and Carmel Valley Road and Del Diablo to Penasquitos Drive/Private Street A is 2662.57 feet.

Following a performance-based design using the principles found in CFC/CBC 1007.1.1, exception 2, the remoteness of secondary access points can be reduced to between 1/3 and 1/2 of the diagonal line rule.

**Finding:** The primary ingress/egress point of the Project site, located at the intersection of Penasquitos Drive and Private Street A, has a separation distance of 1398 feet from the Carmel Valley Road entrance to the Project.

**Finding:** The primary ingress-egress point meets the intent of the remote separation requirement of CFC/CBC 1007.1.1., exception 2, with a separation distance that is more



SI52B-57  
cont.

than half of the averaged separation distance for the Carmel Mountain Road egress point.

SI52B-58

**NOTE:** The proposed off-site emergency evacuation route using the interconnection between Corte Raposo and Andorra Way will be evaluated in a separate Section.

**FPP Page 39; Figure 7; and Evacuation Plan Figures 1A, 1B.**

The diagrams and narratives provided on these pages indicate that the Project intends to 1) use a single day-to-day entry and exit point and 2) provide additional emergency use only ingress and egress points that will, under daily circumstances, be blocked to traffic flow by in-ground removable bollards or lockable gates.

SI52B-59



SI52B-60

The primary day-to-day ingress and egress and evacuation route from the Project site is proposed at the intersection of Penasquitos Drive and Private Road "A". A gated entrance and exit point at this intersection has not been proposed.

SI52B-61

A secondary ingress access point to the Project site has been proposed at the intersection of Carmel Mountain Road and Private Street "V".

SI52B-58

This issue is addressed in greater detail elsewhere in the letter. Please refer to the responses to Comments 37, 38, 71 through 76, 86 and 87, for responses to the more detailed comments.

SI52B-59

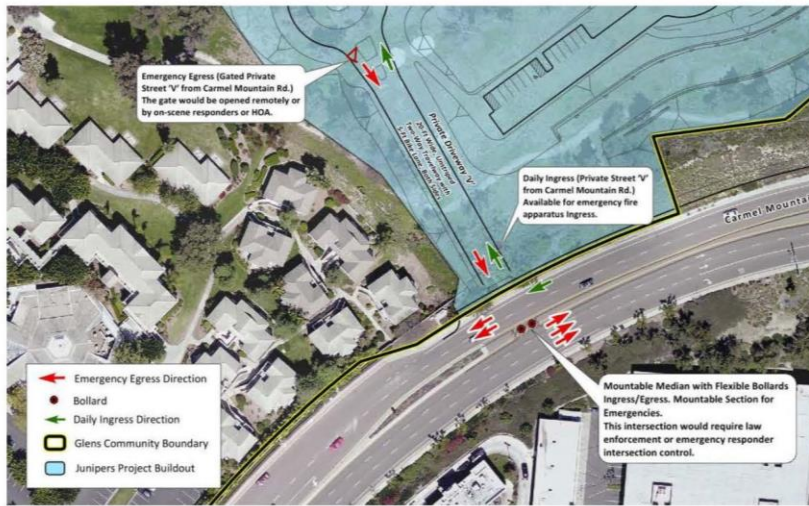
The project will not use a single day-to-day entry and exit point. As discussed in EIR Section 3.3.1.6, *Access/Egress Including Off-site Improvements*, the project has two ingress points; one from Peñasquitos Drive and one from Carmel Mountain Road. The project's primary exit point would be via Peñasquitos Drive and the exit point to Carmel Mountain Road is gated for emergency use only.

SI52B-60

Comment noted. This is an accurate statement regarding the subject intersection, with the exception that Private Driveway V will also provide primary ingress.

SI52B-61

Private Driveway V is also considered to provide primary ingress to the project site from Carmel Mountain Road.

Intersection of Private Street "V" and Carmel Mountain Road

FPP Figure 7 indicates that Private Driveway "V" is a daily ingress route for residents and is anticipated for use by the Fire Department and other first responders for emergency access into the Project Site.

Private Driveway "V" is designated for use as an emergency egress point only; normal day-to-day egress is blocked by a gate that can either be opened "remotely" or by persons responding to the gate and physically opening it.

**Finding:** While residents might be aware of the emergency egress at the gated Private Driveway "V", according to Sime's fire-related human behavior research, they will not use the exit because 1) they **know** the gate **is inoperable on a daily basis**; and 2) it is not the normal egress pathway they use to leave the development.

**Finding:** Figure 7 indicates that the gate has the ability to be opened remotely. This assumes that the person assigned to the task of remotely opening the gate has 1) the technology immediately available to them at all times; and 2) will be available 24-7-365 to use the remote activation technology at a moment's notice and with minimal delays.

**Finding:** As an Engineering response to fire-related human behavior that indicates a reticence to use unfamiliar exit points in favor of those used on a regular basis, the removal of the gate across Private Driveway "V" would encourage residents to use this

SI52B-62 Comment noted. This is an accurate statement regarding the subject intersection.

SI52B-63 This comment includes speculative statements regarding resident reactions during managed evacuation events. The research regarding evacuation events is discussed in Response to Comment 37. It is anticipated that this route would be used in a large-scale evacuation when law enforcement personnel are controlling the intersection and directing evacuees out this exit, across the Carmel Mountain Road median, and to I-15 south.



## COMMENTS

## RESPONSES

SI52B-63 cont.	<p><i>access point on a daily basis, reinforcing its location and availability during emergency conditions.</i></p>	<p>SI52B-64 The comment contains an inaccurate description of the center median bollards on Carmel Mountain Road. The median bollards are not removable bollards, they are drivable bollards that are flexible and give way when a vehicle drives over them without causing vehicle damage. The remainder of the comment is accurate in its description. Please refer to Response to Comment 10 regarding on-site direction for use of this emergency evacuation exit and to Response to Comment 39 regarding available resources for traffic control during a mass evacuation.</p>
SI52B-64	<p>Figure 7 shows that the emergency egress point from Private Driveway "V" is opposite of a mountable center median in the Penasquitos Drive right-of-way corridor.</p> <p>The center median features removable bollards, allowing both southbound and northbound evacuation travel directions when the barricades are removed during emergency incidents.</p> <p>Figure 7 clearly indicates that the center median emergency egress passageway requires the presence of law enforcement or other first responders for traffic control purposes during evacuation operations.</p> <p><b>Finding:</b> <i>As previously indicated, reliance on law enforcement or fire resources to open egress points does not take into consideration resource limitations and availability to perform logistical support functions during dynamic and rapidly evolving emergency incidents .</i></p> <p><b>Recommendations:</b></p> <ol style="list-style-type: none"> <li>1. Instead of installing removable bollards in the mountable center median, provide a level, non-raised paved opening in the median with sufficient width to allow vehicle passage from Private Driveway "V" on to northbound Penasquitos Drive.</li> <li>2. Provide signage on both (west and east) sides of the vehicular opening in the center median, facing the southbound egress lane of Private Driveway "V" indicating that the median open is restricted to emergency evacuation purposes only.</li> <li>3. On the southbound # 1 lane of Carmel Mountain Road, install a sign on the eastern side of the center median vehicle egress opening opposite Private Driveway "V" indicating that the opening may not be used for "U" turns.</li> <li>4. On the northbound # 1 lane of Carmel Mountain Road, install a sign on the western side of the center median vehicle egress opening opposite Private Driveway "V" indicating that the opening may not be used for "U" turns.</li> </ol>	<p>SI52B-65 While the commenter's recommendations were considered during the project design process, only using signs to restrict wrong-way movements is not an effective City practice and can create enforcement issues.</p>
SI52B-65	<p><u>Intersection of The Junipers Emergency Ingress-Egress Road at Del Diablo Street</u></p>	<p>SI52B-66 Comment noted. The removable bollards are meant to prevent daily traffic, and to give emergency response officials the option to remove them during an evacuation if they determine it is appropriate to send vehicle traffic to Del Diablo. HOA representatives would not have the ability to remove these bollards; the FPP and Evacuation Plan have been corrected. The presence of the bollards also means that they can remain in place to prevent access during an</p>
SI52B-66	<p>The FPP and Evacuation Plan propose a twenty-four (24') foot wide emergency ingress and egress roadway in the west central portion of The Junipers development site that intersects with Del Diablo Street. Like the other emergency egress and ingress roads proposed by the documents, this site will be barricaded with bollards that prevent daily use of the roadway.</p>	

SI52B-66  
cont.

Both the FPP and Evacuation Plan indicate that the bollards barricading this egress route would be removed by either the fire department or representatives of The Junipers HOA in the event of an evacuation order.

SI52B-67

**Finding:** While residents might be aware of the emergency egress at the gated intersection at Del Diablo Street\* according to Sime's fire-related human behavior research, they will not use the exit because 1) they know the road is impassable on a daily basis because of the barricading bollards; and 2) it is not used for departures from development on a daily basis.

SI52B-68

**Finding:** The FPP and Evacuation Plan indicates that the fire department or HOA is responsible for removing the bollards in the event of an emergency. This assumes that the person assigned to the task of remotely opening the gate has 1) the technology immediately available to them at all times; and 2) will be available 24-7-365 to use the remote activation technology at a moment's notice and with minimal delays. It also assumes that there will be sufficient fire department personnel available to remove the bollards during fast-paced dynamic events when resource applications will be committed to other operations.

SI52B-69

**Finding:** As an Engineering response to fire-related human behavior indicating a reticence to use unfamiliar exit points in favor of those used on a regular basis, removing the bollards on the emergency egress route would encourage residents to use this access point on a daily basis, reinforcing its location and availability during emergency conditions.

SI52B-70

#### General Discussion About Bollards Across Roadways

According to *Emergency Response – Traffic Calming and Traditional Neighborhood Streets* guidelines, closing streets and egress routes with bollards shifts traffic onto other streets **and denies critical access**. Further, the document states that, except in rare situations, street closures using bollards have very negative impacts on overall

SI52B-66 (cont.) evacuation, if Del Diablo is not determined to be an appropriate route under the particular circumstances of that emergency event.

SI52B-67 Refer to the Response to Comment 37, which addresses the issues of human perception and behavior during an emergency evacuation.

SI52B-68 Please refer to Responses to Comments 37 through 39 for details regarding the project's gates and their management.

SI52B-69 Comment noted. The project does not propose elimination of the bollards to allow daily access. Please refer to the Responses to Comments 37 through 39 regarding the emergency access and management and Section 6.4 of the Evacuation Plan regarding the project's analysis of human behavior during evacuation.

SI52B-70 The project would not close any existing streets or egress routes or result in temporary closures of roadways. The guidelines cited in the comment are not applicable to the

## COMMENTS

## RESPONSES

SI52B-70  
cont.

traffic patterns, should *only* be used as a *last resort* and that emergency access and egress *must* be maintained at all times.

Street closures may be appropriate for some school, park or entertainment areas; these may be temporary or permanent closures.

Breakaway bollards, instead of steel uprights set in, and locked into, concrete pavement bases and other landscaping materials, should be used to prevent motorist entry while allowing emergency access. During emergency operations, responding vehicles can knock down flexible bollards and enter the area. Wider applications of street closure using bollards should be avoided in most cases. The negative effects on a community may be very powerful and long-lasting.

SI52B-71

**FPP Pages 41 and 43; Evacuation Plan Pages 21, 27, 37, 39, 45, 49 Corte Raposo-Andora Way Emergency Ingress-Egress Roadway**

The Corte Raposo-Andora Way emergency ingress and egress roadway is located 0.91 miles north of the north-northeast corner of The Juniper's project area. Other than connectivity via The Glens subdivision roadway system, this emergency ingress-egress point is not directly associated with The Junipers project area. Access to the Corte Raposo-Andora Way egress roadway is via a circuitous 1.25 mile long route over established residential streets with minimum widths that were not designed for effective evacuation purposes.

The Glens residential streets have a daily capacity of 1000 automobile trips. Conservatively, 535 vehicles from The Junipers development could use the proposed northerly evacuation route, significantly impacting the ability of the streets to handle the loads imposed under emergency conditions.

**Existing Condition of the Emergency Ingress-Egress Road**

The Andora Way-Corte Raposo emergency roadway currently has an improved unobstructed paved curb-to-curb width of twenty (20') feet and is approximately 150 feet long.

SI52B-72

The roadway has a maximum slope of 15%. The declination configuration is in a north-to-south direction from Corte Raposo.

The roadway has an degrading asphaltic concrete (macadam/asphalt) driving surface that has not been maintained for a considerable amount of time.

When originally installed in, or about, 1987, the connector road, designated as an approved fire department access point to The Glens subdivision, had removable bollards installed to prevent unauthorized use of the access point, which is located on private property with an easement, dedicating the deed for emergency use purposes only. At

SI52B-70 (cont.) proposed project and the comment inappropriately applies short term event road blocking with bollard guidelines to the permanent situation at the project. Future left turns from the project site onto Carmel Mountain Road are being prevented for daily traffic safety reasons. The project would comply with City of San Diego Municipal Code (Brush Management) and California fire and building codes, as adopted by San Diego. Furthermore, the project will improve emergency access and evacuation from existing neighborhoods, as described in EIR Section 5.14.4.2, *Impact Analysis*. It will also improve daily non-emergency traffic flow as described in EIR Section 5.2.2.2, *Impact Analysis*.

SI52B-71 The comment bases its conclusions on an inaccurate interpretation of the road capacity data presented in Section 4.2 of the Evacuation Plan, which are presented in terms of vehicles per hour; not daily trips (see Table 1, Footnote 1). Also, the route for evacuation from the project to the north would be determined by emergency personnel, and there are no code requirements regarding residential road design for effective evacuation. As shown in the Evacuation Plan in Table 1, *The Existing Glens Community Roadway and Freeway Estimated Vehicle Capacities*, the Glens residential streets were rated as a conservative 500 vehicles per hour (vph) during an evacuation. They can likely move considerably more traffic than this, but as part of a cautious approach, 500 vph was determined by the applicant's traffic engineers to be appropriate. The evacuation plan analysis estimates that one-third of the 1,072 Junipers evacuation trips (approximately 357 trips) would evacuate through the Glens over approximately 3.5 hours (averaging 102 trips per hour). Therefore, the assertion that the project's traffic would consume over half of the Glens residential street capacity is not accurate.



COMMENTS

RESPONSES

some point, persons unknown encased the removable bollards in concrete, making their removal not possible under emergency conditions.



*Aerial View of Current Conditions of Corte Raposo-Andora Way Emergency Access Connector Road*



*Emergency Access Road, Looking South from Corte Raposo Cul-de-Sac*

SI52B-72 Comment noted. This comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-72  
cont.

SI52B-72  
cont.

*Emergency Access Road, Looking North from Andora Way Cul-de-Sac*

SI52B-73

According to the Evacuation Plan, the existing condition of the emergency access roadway has been evaluated by the City of San Diego Fire Marshal. In a meeting conducted with DUDEK representatives on June 28, 2019, Fire Marshal Perry indicated:

- That the existing roadway is a dedicated emergency vehicle access point to The Glens sub-division
- That the existing emergency access point would be available for fire apparatus access
- That the existing emergency access point could be used for resident evacuation or egress during emergency situations
- That the connection point is currently inaccessible and unreliable in its current condition

#### Improvement Plan

The FPP and Evacuation Plan have developed proposed mitigations to improve and/or repair the conditions of the Andora Way emergency access point.

SI52B-74

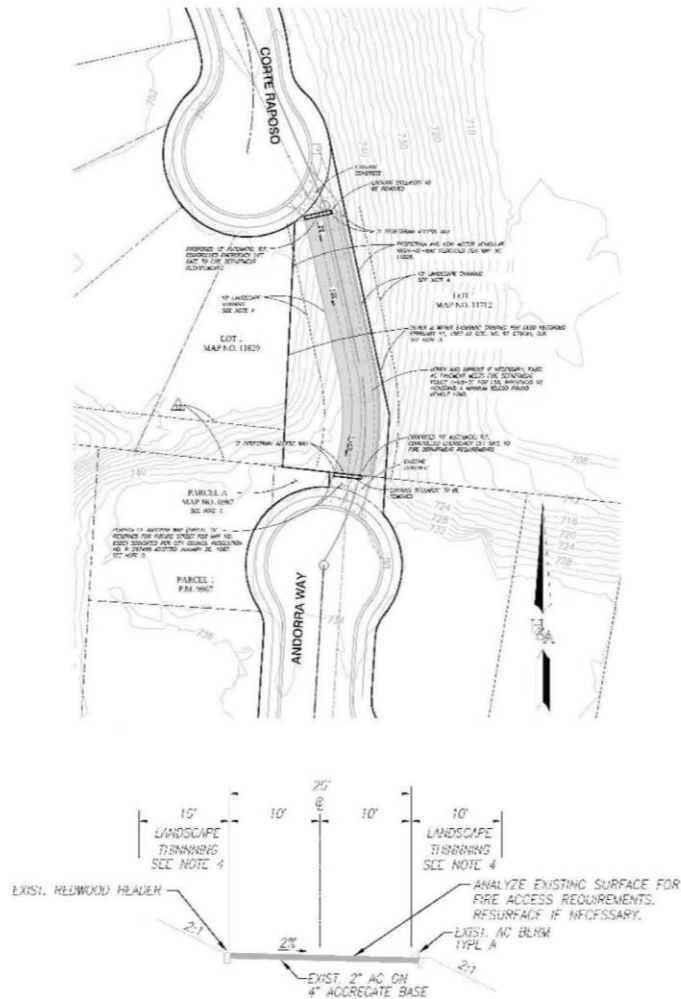
On the southern, Andora Way wise of the emergency access point, the existing bollards and concrete bases will be removed and replaced by an automatic radio controlled traffic gate. The proposed gate has a fifteen (15') foot wide dimension but is required to meet Fire Department requirements for size and installation.

A five (5') foot wide pedestrian pathway will be provided on the western side of the gate and gate mechanism installation.

SI52B-73 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-74 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-74  
cont.



The roadway spanning the gap between Corte Raposa and Andorra Way will have an improved paved width of twenty (20') feet with two (2) ten (10') foot wide driving lanes.



## COMMENTS

## RESPONSES

SI52B-74

cont.

The existing asphalt pavement (two inches of asphaltic concrete [asphalt/macadam] on four inches of aggregate base) will be evaluated for compliance with fire department access road standards and weight bearing capacities.

The existing and proposed road surfaces will have the following slopes:

- Cross slope - 2%
- Initial northern declination at Corte Raposo – 2%
- Mid-slope declination – 15%
- Final southern inclination at Andora Way – 3.16%

**Finding:** The City of San Diego Fire Access Road limits slope inclinations and declinations of asphalt road surfaces at 12%. Roadway slopes between 12 and 15% inclination or declination are required to have an concrete driving surface.

**Finding:** The California Fire Code (Sections 104.8) allows the Fire Marshal to modify agency grade limitations established by the fire department based on project constraints and practical difficulties carrying out the prescriptive requirements of the Code.

**Finding:** The Fire Marshal must find that a special condition exists that makes implementing the strict letter of the Code or departmental standards impractical and that the proposed mitigation is in compliance with the intent and purpose of the Code. The proposed mitigation cannot lessen health, life and fire safety requirements.

**Finding:** San Diego Fire Prevention Bureau Policy A-14-1 also allows the Fire Marshal to modify fire apparatus access road requirements.

SI52B-75

**Finding:** A maximum 15% slope angle does not negatively impact fire apparatus operations; in comparison, the County of San Diego maximum slope angle is a 25% slope.

**Finding:** Slopes greater than 25% negatively impact fire apparatus operations in a number of ways:

- Starting and stopping on a 25% slope can result in damage to the vehicle's drive train
- Starting and stopping on a 25% can cause the hose load on the rear of an engine company apparatus to begin self-deploying out of the hose bed and spill onto the roadway

**Finding:** The SDCCFC slope limitations requiring use of a concrete driving surface is 15%.

**Finding:** The California Fire Code (Sections 104.9, 102.7.2 and 102.8) allows the FAHJ to consult National Fire Protection Association and other fire protection standards from other recognized nationally recognized organizations when allowing

SI52B-75 This comment is noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-75 cont.	<p><i>the use of alternate means of methods of compliance for special circumstances and Project constraints.</i></p> <p><b>Finding:</b> The existing Andora Way-Corte Raposo connection is a previously approved and dedicated emergency access point.</p> <p><b>Finding:</b> Under provisions of the California Building Code (Section 102.6), existing fire and life safety features on premises are allowed to continue without change unless such change is deemed necessary for the general safety and welfare of residents.</p> <p><b>Finding:</b> Any upgrades to the existing conditions may require, at the discretion of the FAHJ or Building Official, to be compliant with the current Codes in effect at the time of the change.</p> <hr/> <p><b>Determination:</b> At the discretion of the Fire Marshal and based on the previous approval of the existing emergency egress connection road, the existing maximum slope limitation <b>may</b> be waived, allowing the asphaltic surface covering to remain in place when repaired.</p>	
SI52B-76	<p>The proposed configuration of the radio controlled traffic gate will be discussed in the next section, along with other proposed gates within The Junipers sub-division project area.</p> <p><b>Section 6.2 Gates</b></p>	SI52B-76 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.
SI52B-77	<p>The FPP and Evacuation Plan documents clearly indicate that various types of gates will be provided along emergency egress routes:</p> <ul style="list-style-type: none"> <li>At the Carmel Mountain Road-Private Road "V" entry point, a gate requiring unlocking by either first responders or HOA representatives is planned to obstruct the south-bound exit lanes from the sub-division area.</li> <li>At the Corte Raposo-Andora Way emergency access connection road, dual radio-controlled overhead swinging traffic gates are proposed. Proposed activation of these gates is stated as either being from fire department personnel or by HOA representatives.</li> </ul>	SI52B-77 Comment noted. The comment indicates that the HOA would have the ability to open the gate, proposed at the Corte Raposo-Andorra Way emergency access connection road, but the Evacuation Plan states in Section 4, <i>The Glens with the Junipers Community Evacuation Road Network</i> , under the "Road Network and Evacuation Routes" heading that the SDFRD and/or law enforcement would have control of that gate, as required by the Fire Code, since the route is a defined emergency vehicle access point.
SI52B-78	<p><u>San Diego Fire Prevention Policies</u></p> <p>Policy K-15-2 requires the installation of <i>Knox-keyed devices</i> where it has been determined that a gate spanning and obstructing an apparatus access road that requires minimal time delays <i>and to improve accessibility for emergency responders</i>. The Knox program provides the Fire Department with a quick and easy method of entering secured areas. The use of a Knox system also minimizes repairs from fire department forcible entry operations and returns the gate system to return to its normally closed mode for community security after an emergency is resolved.</p>	SI52B-78 Comment noted. The FPP in Section 6.2 defines that the gates associated with routine (non-emergency) access to the community would meet SDFRD standards and code requirements including Knox key switch and Opticom control.

## COMMENTS

## RESPONSES

SI52B-78 cont.	<p>When access to a gated community is difficult for emergency responders, the Fire Marshal is authorized to require installation of a Knox key switch at an acceptable location adjacent to the gate. It is the customer's responsibility to install the Knox system components in a secure manner at the approved location. Knox switches must be anchored to metal posts, fences or gate assemblies. The preferred location for mounting a key switch is at the gate control head or adjacent to the gate's entry key pad.</p> <p>There are other performance-based means of opening community security gates across fire access roadways; these are subservient to the primary Knox systems:</p> <ul style="list-style-type: none"> <li>• Opticom light receiving sensors</li> <li>• Activation devices with light or siren sensing modes</li> </ul> <p><u>California Fire Code Requirements for Gate Opening Devices</u></p> <p>Section 503 regulates the installation and operation of community security gate systems:</p> <ul style="list-style-type: none"> <li>• Electric gate operators must be approved with a UL-325 listing</li> <li>• Electric gate intended for automatic operation shall be designed, constructed and installed in compliance with ASTM-F2200.</li> <li>• Gates installed across fire apparatus access roads shall have an approved means of emergency operation</li> <li>• Gates shall be maintained in operational condition at all times</li> </ul> <p>Approved means of emergency operation include:</p> <ul style="list-style-type: none"> <li>• Manual disconnect mechanisms</li> <li>• Emergency power systems, including UPS battery packs</li> </ul>	
SI52B-79	<p><u>CCR Title 14, Section 1273.11- Gated Entrances</u></p> <p>While not applicable to installations within the City of San Diego, CCR Title 14 gives the following guidance about security gate installations across fire apparatus access roads. The standards are also included in the prescriptive requirements of the San Diego County Consolidated Fire Code.</p> <p>Gate entrances must be a minimum of two (2') feet wider than the traffic lanes they serve. The minimum horizontal dimension for gates is fourteen (14') feet wide; gates must have a minimum fifteen (15') foot vertical clearance.</p> <p>Gates providing to a driveway or fire department access road must have a minimum thirty (30') foot setback from the intersection providing access onto the fire apparatus access road.</p>	SI52B-79 Comment noted. The comment identifies Title 14 and San Diego County Consolidated Fire Code gate requirements. The codes described are not required in the City of San Diego, and therefore are not applicable.
SI52B-80	<p><b>Finding:</b> <i>The proposed width of the electric access gates at both ends of the emergency access connection road between Corte Raposo and Andora Way are fifteen (15') feet.</i></p>	SI52B-80 Comment noted. Please refer to Response to Comment 79 above. The proposed gates on either end of the existing emergency access point were determined by SDFRD to improve the existing condition, resulting in a more reliable emergency vehicle access and evacuation point, as discussed in Sections 4.1 and 4.2 of the Evacuation Plan.



SI52B-80  
cont.

**Finding:** The proposed gate meet the minimum dimension of fourteen (14') feet as indicated in CCR Title 14.

**Finding:** The proposed width of the gates do not meet the CCR Title 14 dimension of being two (2') feet wider than the road lane(s) they serve.

SI52B-81



SI52B-82

**Finding:** The installation of a fifteen (15') foot wide electric gate and two bollards across the emergency access connection roadway is problematic:

- The full width of the roadway is constrained at the entrance points
- Constraint of the entrance point will **not** allow **simultaneous** egress of evacuating residents and ingress of emergency response vehicles without

SI52B-81 Comment noted. Please refer to the Response to Comment 79 for an explanation of the reason that the comment's finding is not applicable.

SI52B-82 Comment noted. Please refer to the Responses to Comments 37, 38, and 77 regarding the opening of gates and removal of bollards. The design of this gate has been reviewed and approved by SDFRD. Please also refer to the response to Comment 83 below regarding the sequencing of events during an evacuation and how the gates and bollards would be removed and when.

## COMMENTS

## RESPONSES

SI52B-82  
cont.

unnecessary delays while vehicles going in opposite direction are attempting to negotiate the constrained space

- To achieve full use of the width of the access road, the proposed removable bollards will require immediate removal at the onset of the evacuation operation
- First arriving fire apparatus will not proceed to the gateway but will, instead respond to the fire scene for emergency intervention and suppression purposes. This will result in an inevitable delay in opening the gate for evacuation purposes.

Both the FPP and Evacuation Plan indicate that representatives from The Junipers HOA will have the ability to open the emergency access gate.

**Finding:** Keys for Knox key-switch systems are infrastructure security devices and members of the general public, by Knox contractual agreements between fire and other governmental jurisdictions, are not allowed to possess the keys or operate the key-switch mechanism.

SI52B-83

**Finding:** Radio frequency activation devices for gate opening mechanisms are tuned to specific public emergency response frequencies. HOA representatives, as civilians not affiliated with the fire or police departments, are not permitted by FCC regulations to possess radios that will activate gate mechanisms.

**Finding:** There is no guarantee that HOA representatives will be available on a 24-7-365 basis to open any of the proposed gates in a timely manner, especially under emergency response conditions.

**Finding:** The HOA representative may not be able to reach the proposed gates on a timely manner due to congested road conditions when an evacuation order is given by public officials.

**Finding:** Until incident conditions stabilize, response personnel will not be available to fulfill the logistical needs of the emergency.

SI52B-84

**Determination:** Provision of non-Knox keyed, radio frequency activation methods or physical means of opening access road gates is not a practical method of insuring that emergency access routes will be available at all times for evacuating residents

SI52B-85

**Determination:** The City of San Diego has established a **strict** Fire Prevention policy that restricts electric gate opening mechanisms only to the approved Knox key switch assemblies. All other gate opening mechanisms are not compliant with the San Diego City Fire and Municipal Codes and are, therefore, non-compliant with the California Fire Code.

SI52B-86

**Recommendation # 1:** Instead of providing manual or electrically operated gates across emergency ingress and egress routes, it is recommended that 1) flexible vertical

SI52B-83 Comment noted. As discussed in Section 6.2 of the FPP, SDFRD and/or law enforcement will control the use of this route during an evacuation and as such, if it is to be opened to evacuees, the removal of the bollards is not considered a significant additional event while personnel are on-scene directing the evacuation. Please also refer to the Responses to Comments 37 and 38 for details regarding SDFRD control of the northern evacuation route/emergency vehicle access point. The timing of response personnel availability and decisions to implement an evacuation are irrelevant to the analysis within the Evacuation Plan and Section 5.14.4 of the EIR. The analysis demonstrates that once a decision is made to evacuate the community, there would be a substantial improvement in the time required to evacuate the Glens community, with implementation of the proposed project, compared to the time required for evacuation of the existing Glens homes, without project implementation.

The proposed enhancements to the road and the gates/ bollards at the northerly emergency access point are considered a significant improvement to the reliability of this route for emergency vehicle ingress/egress, when considered necessary for resident evacuation (either to the north or from the north). The gates at either end of this road will be provided to the specifications of the SDFRD, providing them with the necessary means of opening the gate remotely or manually. The Evacuation Plan in Section 4 states as follows: "Use and control of said facility shall be

## COMMENTS

## RESPONSES


	<p>SI52B-83 (cont.) determined by City of San Diego Fire Department or Police Department.” Please note that Junipers HOA members would not have the ability to open gates or bollards at emergency-only access points. The FPP and Evacuation Plan have been revised to clarify this. The City agrees with the comment’s descriptions of Knox and Opticom restrictions and the FPP indicates in Section 6.2 that Knox and Opticom will be provided on all gates to the satisfaction of the SDFRD. Clarifications have also been added to the Evacuation Plan in Sections 1, 4 and 4.1.1, to make it clear that all internal project gates will be equipped with Knox key switches and Opticom that enable law enforcement and fire personnel to open the gates. Internal project bollards will be removable by fire/law enforcement. No changes will be made in the FPP or Evacuation Plan regarding the northerly emergency evacuation point as it is clear in the FPP and Evacuation Plan that HOA members would not have the ability to open that gate or remove the bollards.</p> <p>SI52B-84 Comment noted. Please refer to Response to Comment 83 regarding opening of emergency access gates.</p> <p>SI52B-85 Comment noted. The gates will be fitted with the SDFRD-specified opening devices. Internal project gates will enable emergency response access, similar to gated communities throughout San Diego. Please refer to Response to Comment 83 for additional information.</p>
--	--



## COMMENTS

## RESPONSES

SI52B-86	<p>Comment noted. It is not reasonable to have drivable bollards between Andorra Way and Corte Raposo. This will be an emergency vehicle access only, controlled by SDFRD only. It will not be desirable in all emergency evacuation cases to send traffic through this access/egress point. It is important that SDFRD have control over whether to open this gate and the direction of traffic flow through the gate that will facilitate safe evacuation. Similarly, traffic control is required (as detailed in The Junipers Evacuation Plan) during an evacuation where vehicles are entering onto Carmel Mountain Road from Private Street V. Please refer to Responses to Comments 65, 66, and 70.</p>
----------	---

- SI52B-86 cont. bollards be installed at the Corte Raposo-Andora Way location and 2) the gate at the Private Road "V" roundabout be entirely removed, providing an open-at-all times egress point from the Project area.
- SI52B-87 **Recommendation # 2:** With the cross-connecting road between Andora Way and Corte Raposa being an existing dedicated fire department ingress road, remove all bollards and gates from the cul-de-sac bulbs that block access. Convert the site features to a completely unrestricted fire department access route into both sub-division areas. Signage at the cul-de-sac entrances should be installed to indicate the presence of the fire department ingress point and that the route can be used for emergency evacuation purposes.
- SI52B-88   
*Example of Evacuation Route Signage*
- Recommendation 3:** Permanent Evacuation Route Signage, with clearly visible directional arrows, should be installed at appropriate intervals along all proposed evacuation routes within the impacted sub-divisions (see above)
- Discussion:**
- SI52B-89 The existing fire department ingress route is not accessible because of bollards that have been implanted and fixed inside of concrete basins. Therefore, the fire department has not used this ingress route for daily access to The Glens subdivision for a considerable amount of time.
- With disuse over time, it is a logical assumption that firefighters may not be aware of the emergency ingress point into the subdivision(s), even though it may be present on the electronic run maps installed in the apparatus computers. Firefighters assigned to the stations in the immediate vicinity of the subdivisions when the ingress route was opened may have transferred to other stations or operational/administrative assignments or may have retired from service without passing along institutional knowledge about the ingress road to their colleagues.

- SI52B-87 Comment noted. The comment's recommendation to eliminate obstructions between Andorra Way and Corte Raposo is addressed above in Response to Comment 86. It would not be prudent to add evacuation signage in any wildland fire area because wildfires are not as predictable as some emergency situations. The SDFRD will have control over whether to open this gate as they will determine the direction of traffic flow through the gate that will facilitate safe evacuation.
- SI52B-88 As explained in Response to Comment 87, evacuation route signage is not considered a sound approach for wildfire.
- SI52B-89 Comment noted. Fire personnel from nearby stations, particularly the first due station, routinely familiarize within their jurisdictional area and would be apprised of the new conditions with the project's construction. As stated in the FPP in Section 6.6.3.2, *Trail Vegetation Management and Response Facilitation*, updated digital mapping data would be provided and, as discussed in the Evacuation Plan in Section 5, *The Glens with the Junipers Resident Wildfire/ Evacuation Awareness*, the Junipers HOA would actively coordinate with the SDFRD during annual evacuation training and outreach.

SI52B-90

**Section 6.3 Driveways**

**Finding:** The primary driveway narrative section does not raise any content or Code compliance issues.

**Section 6.4 Structures****Section 6.4.1 Ignition Resistant Structures**

The narrative provides minimal details about requirements about ignition resistant construction methods and standards other than all buildings will be required to comply with CBC Chapter 7-A.

**NOTE:** Fire Protection Plan sections covering building construction that were evaluated by the Consultant as a FAHJ plan reviewer generally spanned several pages and included in-depth construction details for building features providing enhanced fire resistive characteristics.

**Finding:** Other than minimal details, this section does not raise any content or Code compliance issues and meets minimum Code and FPP content standards.

**Section 6.4.2 Additional Requirements & Recommendations Based on Occupancy Type**

**Finding:** This section does not raise any content or Code compliance issues.

**Section 6.5 Fire Protection Systems****Section 6.5.1 Water**

**Finding:** This section does not raise any content or Code compliance issues.

**Section 6.5.2 Fire Hydrants**

**Finding:** This section does not raise any content or Code compliance issues.

**Section 6.5.3 Fire Sprinklers**

**Finding:** This section does not raise any content or Code compliance issues.

**Section 6.5.4 Smoke Alarm Systems**

**Finding:** This section does not raise any content or Code compliance issues.

SI52B-91

**Section 6.6 Defensible Space/Fuel Modification Zones**

SI52B-90 Comment noted. Repeating the details of the ignition resistant requirements found in Chapter 7A that will be applied to all project structures is not required and is easily referenced through the State Fire Marshall's Office Website and many other sources.

SI52B-91 Comment noted. The project's FPP indicates that portions of the project are within a VHFHSZ area and describes that the project does not include wildlands directly adjacent to any portion of the project. The City agrees that a portion of the project is within a generally defined wildland urban interface, and this has been clarified in Section 5.4.1 of the FPP. The

SI52B-91  
cont.**Section 6.6.1 Zones and Permitted Vegetation**

As previously cited in Section 1.2.2, The Junipers development site is within a Wildland Urban Interface Area, with portions of the lands included in a City of San Diego designated Very High Fire Severity Area. Defensible space requirements and fuel modification zones established in Chapter 49 of the California Fire Code and Section 51182 must be applied to all residential parcels within the development area.

**Section 6.6.2 Brush Management Zone Requirements**

As previously cited in Section 1.2.2, The Junipers development site is within a Wildland Urban Interface Area, with portions of the lands included in a City of San Diego designated Very High Fire Severity Area. Defensible space requirements and fuel modification zones established in Chapter 49 of the California Fire Code and Section 51182 must be applied to all residential parcels within the development area.

***Finding and Recommendation:*** Defensible space is required for all project parcels. Based on limited lot sizes, defensible space will most likely be Fuel Modification Zone 1, totally irrigated landscaping, from the exterior walls of each building to the proposed property lines of each parcel.

**Discussion:**

Fuel Modification Zones are specific areas on a property where vegetation has been removed, planted with alternative landscaping or modified in ways that increase the likelihood that a structure will survive a wildfire, improve defensible space around the structure for firefighting activities and prevent flame contact with the building from a spreading fire. In this strategy, vegetation, including ornamental plants, non-native, naturalized or invasive plant species may be removed and are re-planted with fire- and drought-tolerant species, or may be thinned to decrease the available natural vegetative fuel loading on the property. The reduction of available fuel effects the flame lengths and the amount of heat produced by the fire and decreases fuels around houses that can ignite through firebrands and ember showers produced by wildfires moving across the landscape.

Each sub-zone in a Fuel Modification Plan is designed to lower the amount of fuel available to a wildfire the closer the fire gets to a building. Additionally, the amount of moisture retained by plants inside Fuel Modification Zones increases as the distance from buildings decreases. However, it is important to remember that following Fuel Modification principles (removal of flammable vegetation, thinning flammable vegetation and providing irrigated fire resistant landscaping with in perpetuity maintenance of defensible space) does **not** guarantee structure survivability during wildfires. This strategy merely increases the chance of survivability to a reasonable level of relative safety.

Because of the nature of Southern California soils, it is imperative to consider the potential for hillside erosion and the need for slope stabilization.

SI52B-91 (cont.) FPP specifies that all project landscaping and structures incorporate ignition resistant materials/construction including conformance with the California Fire Code (CFC) Chapter 7A ignition resistant standards.

SI52B-92 Comment noted. The comment describes fuel modification zones (FMZs) and provides a general discussion of their purpose, function, and framework. However, the FMZs described are not consistent with SDFRD's Brush Management requirements. As described in the Responses to Comments 7 through 13, BMZs are not required for this project; however, the project incorporates fire-resistant landscaping.



SI52B-92  
cont.

Every effort should be made to avoid the need for total removal of native vegetation on hillsides. Increasing structural setbacks for proposed structures on slopes will reduce the amount of work required on the adjoining hillside as well as improving defensible space around the structure. Efforts should be made to use modified native vegetation on slopes as much as possible to provide adequate hillside stabilization.

Native plants are better adapted to local topography and provide important wildlife habitat and protection from erosion. Erosion concerns, combined with the need to address water conservation measures, require the careful selection of plant species as well as the placement of pathways, patios, retaining walls and other landscaping features so that a well-designed fire-wise landscape provides an environment that accomplishes more than achieving the goal of fire safety mitigation.

Defensible space can be accomplished in ways other than plant modification. Paved brick, gravel pathways, rock borders, dry streambeds, water features, swimming pools and other features made of non-combustible materials can contribute to a structure's defensible space. Structural survivability can also be improved through the use of fire resistive building construction standards as outlined in Chapter 7-A and 7-B of the California Building Code.

Fuel Modification Zone 1 comprises the first defensible space surrounding a building and has a minimum width of 50 feet.

Fuel Modification Zone 1 includes the level building pad. If 50 feet is not obtainable around each structure on a lot, each individual lot owner is still required to maintain his or her front, side and back yards to a zone depth of 50 feet on the flat building pad and on natural slopes or manufactured slopes around their homes with irrigated fire resistant Zone 1 landscaping requirements.

Plants in this irrigated Zone will not include any pryophytes, which are high in oils and resins, including eucalyptus, cedar and juniper species. Trees must be planted and maintained so that when they reach maturity their branches are at least 10 feet away from any structure.

This fire-resistant landscaped zone is permanently irrigated and will consist of fire resistant and maintained plantings. Thick succulent or leathery leaf plant species are the most fire resistant' plants with paper-thin leaves and small twiggy branches are the least fire resistant.

Regular maintenance and continued irrigation is very important in Zone 1.

Plants with high moisture content are less likely to burn. Sidewalks, concrete patios, decorative rock, swimming pools, and similar landscape features may be included in this zone (and Zone 2) as these features will not support fire.

This irrigated zone (unless irrigation causes erosion) consists of native and non-native

SI52B-92  
cont.

fire resistant and maintained plantings less than 18 inches high. This Zone may also contain fire resistant specimen size trees or single well-spaced ornamental shrubs taller than 18 inches, intermixed with ground covers

**Section 6.6.2.1 Fire Resistive Landscaping**

Evaluation of the proposed landscaping plan and FPP Appendix Chas identified that four (4) unacceptable/prohibited plant species are proposed for various areas of the development site:

Acacias  
*Muehlenbergia* (deer grass)  
 Pines  
*Salvia* – all sage species

SI52B-93

**Discussion:**

Although all plants will burn under extreme fire conditions, research has shown that some types of plants, including many natives, are more fire resistant than others.

The Recommended Plant List in the FPP includes a list of low fuel volume, non-oily, non-resinous plants commonly referred to as “fire resistant”. This term comes with the caveat that these plants must be annually pruned, all dead wood removed, and all grasses or other plant material are removed from beneath the circumference of their canopies.

The FPP Recommended Plant List includes native species occurring on the project property that are not considered undesirable from either a biological or wildfire risk management perspective if they are properly maintained by June 1st of each year.

**Section 6.6.3 Other Vegetation Management**

**Section 6.6.3.1 Water Retention Basin**

*Finding:* This section does not raise any content or Code compliance issues.

**Section 6.6.3.2 Trail Vegetation Management & Response Facilitation**

*Finding:* This section does not raise any content or Code compliance issues.

SI52B-94

**Section 6.6.3.3 Central Green Spaces, Ball Fields, Parks**

*Finding:* This section does not raise any content or Code compliance issues.

**Section 6.6.3.4 Pre-Construction Structure Locations**

*Finding:* This section does not raise any content or Code compliance issues.

**Section 6.6.4 Undesirable Plants**

SI52B-93 Comment noted. The landscape palette has been revised to remove these genera and replace them with plant types not found on the prohibited plant list or otherwise known to be more flammable species.

SI52B-94 Comment noted. The four identified plants have been eliminated from the project plant palette.



SI52B-94  
cont.

*With the exception of the four plant species identified in Section 6.6.2, this section does not raise any content or Code compliance issues.*

**Section 6.6.5 Site Wide Area Vegetation Management**

***Finding:*** *This section does not raise any content or Code compliance issues.*

**Section 6.6.6 Annual Landscape Compliance Inspection**

***Finding:*** *This section does not raise any content or Code compliance issues.*

**Section 6.6.7 Construction Phase Vegetation Management**

***Finding:*** *This section does not raise any content or Code compliance issues.*

**Section 7 Evacuation Plan**

**Page 13, Section 2, Background**

Evacuation during a wildfire is not necessarily directed by the fire agency, except in specific areas where fire personnel may enact evacuations on-scene. The City's Police Department or Fire-Rescue Department have primary responsibility for emergency evacuations. These agencies work closely within the Unified IC System, with the City's Emergency Operations Center (EOC) and County OES. To that end, the San Diego Fire-Rescue Department (SDFRD), Police Department, Public Works, Planning, Emergency Services Departments, and California Department of Transportation (Caltrans), amongst others, have worked as part of a Pre-Fire Mitigation Task Force to address wildland fire evacuation planning for City of San Diego.

SI52B-95

Under established local and State disaster plans, and for consistency of operations, the local law enforcement (police department) agency is responsible for implementing on-scene evacuations. This is confirmed on page 17 of the Evacuation Plan.

As noted above, the fire department will not actively engage in, or direct, evacuation of residents. The established mission of the fire department under fast-moving and dynamic fires is to provide resources for incident stabilization, suppression and control functions.

**Page 20 – Shelter in Place Discussion**

directed to evacuate by police or fire personnel. The Glens includes homes built in the 1970's and are in varying states of ignition resistance. Unlike most new master planned communities that incorporate ignition resistant construction and provide defensibility throughout (like the Junipers will), responding fire and law enforcement personnel may not be able to direct residents to temporarily refuge in their homes at The Glens Community except for residents of the Junipers. Homes that are not built to the ignition resistant standards can be retrofitted to increase their ability to withstand wildfire and ember storms by focusing on roofs, windows, walls, vents, appendages and defensible space. Attention to these components of a home's fire protection system is recommended for existing Glens homeowners.

SI52B-96

SI52B-95 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.

SI52B-96 The Evacuation Plan provides a general assessment of the existing Glens neighborhood structures and provides recommendations for homeowners. It does not mandate or require that they retrofit for ignition resistance, and no conclusions within the Evacuation Plan are based on such actions except that the existing Glens community cannot be considered, in its current condition, as a potential on-site sheltering location during a wildfire emergency.

## COMMENTS

## RESPONSES

SI52B-96 cont.	<p>The recommendation for retrofitting older homes for compliance with modern ignition resistant construction is good in theory, but impractical in reality.</p> <p>Upgrading to current ignition resistant construction features involves removal of existing roofs and replacement with Class A roof assemblies or coverings, depending on the City's locally adopted ordinances; removing non fire-resistant rated windows and doors and substituting the originals with FR-rated replacements; adding minimum one-hour FR-rated wall assemblies to buildings which do not have existing FR rated walls; replaced both roof and attic vents with specially designed and constructed replacements which trap embers and do not allow wind currents to drive them deep within attic spaces.</p> <p>The evacuation plan calls for retrofitting/improving defensible space around buildings. Defensible space requirements are integral to the SDFD Brush Management Plan, which The Junipers FPP indicates is <i>not</i> necessary because the Project area(s) are not in VHFSAs or on, or adjacent to, WUI exposure areas.</p> <p>At this time, the City of San Diego does not have an ordinance or Municipal Code section that mandates implementation of retrofitting of residential structures for compliance with CBC Chapter 7-A ignition resistant construction.</p> <p>CBC Chapter 7-A requirements for exterior exposures to wild fires only applies to new buildings built in VHFSAs, or any fire hazard severity zone, SRA lands or WUI areas that are built after 2008. There are no prescriptive requirements in CBC 7-A that mandate the retrofitting of existing buildings with Chapter 7-A construction requirements.</p> <p>CFC Chapter 11 for existing buildings does not promulgate regulations for the retrofitting of CBC Chapter 7-A standards on Group R-3 single and two-family dwellings. CFC Chapter 11 does not apply to single- and two-family dwellings.</p>	SI52B-96 (cont.) Landscape and structural vulnerabilities were noted. Each of these vulnerabilities can be addressed by homeowners and that fact was pointed out in the Evacuation Plan. As documented during two community meetings, some Glens residents expressed concerns over wildfire; the recommendations were provided as a community service for those homeowners who may wish to improve the defensibility of their homes and the community. Additionally, although BMZs are not required at the project site, the FPP recommends the incorporation of fire-resistant building materials and landscaping. See the Responses to Comments 7 through 13 and FPP Sections 1.2.2 and 6.4.1.
SI52B-97	<p><b>Finding:</b> The Evacuation Plan statement that requiring that The Junipers sub-division houses have Chapter 7-A fire resistive standards imposed upon them contradicts the FPP stand that the proposed sub-division is not in a VHFSAs or WUI exposure area.</p>	SI52B-97 The comment is inaccurate. FPP Section 1.1 states that a portion of the project is within an area designated as a VHFHSZ. Again in Section 5.4.1, the FPP states most of the project site has not been placed into a VHFHSZ (meaning portions of it have been designated VHFHSZ). Nevertheless, the FPP specifies that all structures be built to the Chapter 7A (CFC) ignition resistant standards and that the project incorporate fire-resistive landscaping. This has been clarified in Sections 6.4.1, 6.6.1, and 6.6.2 of the FPP.
SI52B-98	<p><b>Finding:</b> Portions of The Junipers sub-division is within a VHFSAs and entirely within a WUI exposure area, which automatically requires application of Chapter 7-A construction standards.</p>	
SI52B-99	<p><b>Finding:</b> Without prescriptive regulatory mandating retrofitting and the high financial impact of modifying existing homes to conform to Chapter 7-A standards, most homeowners within The Glens sub-division will foreseeably opt out of the Evacuation Plan's recommendations for up-grades.</p>	
		SI52B-98 Comment noted. Please refer to the Responses to Comments 96 and 97.
		SI52B-99 Comment noted. See the Response to Comment 96.

and codes that guided construction at the time the homes were built. The structures in The Junipers Community, including the proposed homes and the proposed community building, would apply the ignition resistant building codes codified in Chapter 7A of the California Building Code, would be ignition resistant, defensible and designed to require minimal firefighting resources for protection, which enables this contingency option when it is considered safer than evacuation

The Evacuation Plan infers that the provision of CBC Chapter 7-A wildfire exterior exposure standards will provide this part of the community with features bringing the sub-division into alignment with Shelter-in-Place Community performance-based design criteria.

Shelter-in-Place Communities is a performance-based design strategy in which the *entire* community *must* be built and share the same ignition resistant design qualities. These characteristics include, but are not limited to:

- A well maintained, FD approved landscape and vegetation management plan
- Adequate roadway and driveway widths designed to accommodate two-way traffic, with unobstructed paved minimum curb-to-curb widths of thirty-two (32') or more feet for interior streets and roadways
- Adequate and non-restricted provision of secondary access roads from the community, each providing two ways of evacuation travel away from the sub-division
- Adequate water supply and fire flow for fire suppression operations
- Vegetation modification zones *around the entire community*
- Ignition resistant construction features that are designed to withstand heat and flames from a wide approaching flame front
  - Boxed in, heavy timber or ignition resistant eaves with no vents
  - Residential fire sprinklers
  - Well maintained FD approved fire resistant landscape with a minimum 100 feet of defensible space around all structures
  - Class A ignition resistant roofs
  - Dual pane tempered glass windows
  - Chimneys with spark arrestors
- Maintenance of all fire protection features on an in perpetuity approach
- Additions and changes to landscaping and lawn structure features are strictly regulated by the Fire Department

**Finding:** With The Glens sub-division, with sub-standard fire resistant construction that does not comply with Chapter 7-A standards, The Junipers cannot be effectively designed as the Shelter-in-Place community inferred by this section of the Evacuation Plan.

**Finding:** The City of San Diego does not have a specific policy, ordinance or regulations covering the design and implementation of Shelter-in-Place Communities.

SI52B-100 Please note that while the project will conform with CBC Chapter 7-A, the Evacuation Plan does not designate The Junipers as a shelter in place community. Section 3.3.3, *Shelter-in-Place (County EOC Discussion)*, of the Evacuation Plan indicates that the project will be built to a level that it can be utilized for temporary on-site sheltering, as a contingency to an unsafe evacuation scenario. This is true of virtually any new, master planned community built in San Diego County over the last decade or longer. Because the project is not proposed to be a shelter in place community, the remainder of the comment is not relevant.



SI52B-101

**Finding:** *Currently, the only fire jurisdiction permitting the design and implementation of Shelter-in-Place Communities in San Diego County is the Rancho Santa Fe Fire Protection District.*

**Discussion:**

The Shelter-in-Place Strategy, despite claims of its recent consideration and implementation, can be traced back to a Montana firestorm known as “The Big Blow-Up” when Ranger Edward Pulaski ordered 45 firefighters into an abandoned mine, at gunpoint, before being overrun by a flame front.

During the 2007 Witch Fire and 2008 Tea Fire in California, residents chose to seek shelter within the fire perimeter instead of attempting to evacuate when threatened by rapidly spreading wildfires.

The Rancho Santa Fe Fire Protection District in northwestern San Diego County has established five separate sub-divisions designated as Shelter-in-Place communities.

While less common than evacuation, the Shelter-in-Place Strategy occurs in one of three conditions:

- When shelter-in-place is the only option because evacuation routes are exposed to or overrun by the wildfire flame front
- When evacuations are considered to be too risky because the location and intensity of a fire with rapid rates of spread is unknown and the perceived margin of safety for evacuation is too small to risk being overrun during evacuation transit to a safe location
- Residents choose to shelter inside of a specially hardened building with enhanced defensible space that the building will provide an increased chance of surviving a fire

SI52B-102

In recent years, the shelter-in-place strategy has garnered increasing attention in wildfire emergency planning for several reasons.:

- On-going residential development and escalating fire losses in wildland-urban-interface areas results in a need for innovative strategies to protect lives and property.
- The Shelter-in-Place policy (known as “Stay or Go”) introduced in Australia to reduce the number of last-minute evacuations and improve structural survivability has increased awareness about the role of in-house sheltering during wildfires
- Many dense, fire prone communities have poor egress (in terms of number of routes, direction of routes and capacity of routes) may not allow residents to evacuate in a sudden onset fire scenario, which leads to a frantic search for viable alternative protections.

The Shelter-in-Place strategy is one of many protection actions/options taken to reduce the impact of a wildfire emergency on a threatened population. For emergency

SI52B-101 Comment noted. Per the Response to Comment 100, there is no conflict with this comment and the project’s FPP.

SI52B-102 Comment noted. This comment presents general shelter in place information and conclusions that are not in conflict with the FPP or Evacuation Plan. The project will not be designated as a shelter in place community.

SI52B-102  
cont.

managers, protective actions can include evacuations or controlling access to threatened areas. Emergency managers must approach this task with regard of successfully categorizing life and property safety and protection alternatives with their primary goal. Sheltering in place can either be seen as a life-saving option or it can include protecting life and property.

Generally, there are two options for providing protection actions in a dynamic wild fire situation with rapid rates and directions of spread:

- The decision to evacuate
  - Involves the question of where to evacuate to
  - Involves the question of when to evacuate
  - Involves the question of how an evacuation will take place
- The decision to adopt in-place sheltering
  - Choice of in-home sheltering
  - Choice of other than in-home shelter locations
  - Choice of protecting life and property objective focuses on properly hardening the chosen building or location to protect the lives within the location or building
  - When the choice of sheltering is other than a house, the goal becomes limiting loss of life or injury by choosing the proper shelter type
  - Proper shelter type in this scenario can be a structure, safe area or body of water

Wildfire present significant challenges with highly dynamic contexts in which emergency managers must make protection active decisions, with the capability of adapting to the ever changing situation. Protective action decisions using a most preferred course of protection action can change with little notice and the original preferable option decision must be reassessed according to the new fire conditions.

Protective actions depend on “trigger points”, agreed upon events that represent at which time or place a fire crosses a geographical and anticipated condition on the landscape. Trigger point activations are usually spontaneous decision during a dynamic fire event or may represent a pre-set event for timing the evacuation based on different emergency scenarios.

Protection action decisions must analyze the perceived timing of foreseeable events during dynamic fire scenarios. This is critically important in relationship to evaluating when the flame front will arrive at particular locations in the incident area. In short, how much time is available to select and implement a protective action before it is no longer viable?

The option to leave with significant time available is generally called an “early evacuation” whereas an option with little or no time to evacuate is termed a “late evacuation.”

Similarly, the timing to decide whether or not to seek shelter is also important:

- Is it made well in advance of the approaching fire front OR

SI52B-102  
cont.

- Is it made at the last possible moment?
- Is there sufficient time to notify threatened populations?
- Is there sufficient time to evacuate the threatened population and move them to either a safe location or evacuation center?

Sheltering-in-place takes less time than evacuations but its effectiveness varies with the protective qualities offered by the selected shelter.

Evacuation is the process of removing people from the threatened area and is the most common method used because it offers a relatively high level of life protection. If there is sufficient time available to clear the threatened area, shelter-in-place offers protection against the direct effects of fire. Shelter-in-place has a range of approaches including harboring in buildings, safety areas or bodies of water. Shelter in Place can be subdivided into two basic aspects: a) refuge shelters and b) in-house shelters. Refuge shelters do not require an active defense for the occupants and often involves a short trip to a refuge site in either a vehicle or on foot.

**Finding:** No single protection active represents a universal solution to eliminating casualties in fire-prone areas. Each protection action has circumstances that may outweigh the benefits of other forms of protection.

**Finding:** In general, evacuation and shelter-in-place protective actions have all resulted in successful and unsuccessful outcomes in protecting people in wildfires.

**Finding:** Continuing research into the protective actions of evacuation and sheltering-in-place indicates that sheltering in place **should remain as a viable backup plan to evacuation is not feasible or do not offer a higher level of life protection.**

#### Page 47 – Northern Off-site Evacuation Route

SI52B-103

2. The Junipers is proposing an off-site project "feature" which offers a significant Glens evacuation improvement by enhancing the northerly emergency fire access road between Andorra Way and Paseo Corte Raposo to allow for reliable fire apparatus ingress or fire department controlled emergency resident evacuation. EIR Proposed enhancements include: removing the inoperable bollards, providing an automatic, remote opening gate meeting SDFRD requirements, and resurfacing the road (previously referenced Figures 9 and 10) and providing ongoing fuel modification and gate maintenance. Figure 11 provides a comparison between the existing condition and the proposed enhancements. These off-site enhancements as part of the Junipers project will benefit all current and future residents. This road, with the proposed upgrades and enhancements, would enable managed evacuation to the north for Glens' and Junipers' residents as an augmenting or alternative to Peñasquitos Drive and the Junipers' new emergency evacuation route (Street V) to Carmel Mountain Road (refer to Tables 2 through 4 in Section 4.2.1). Use and control of said facility shall be determined by City of San Diego Fire Department or Police Department. Facility could be used for emergency vehicular ingress or community vehicular egress. This will be determined by the emergency response personnel at the time. The improvements to said facility will facilitate either option and will be determined on a case by case basis.

SI52B-103 Comment noted. The gates at either end of the northerly emergency evacuation access will be provided per SDFRD's requirements and specifications. The comment's concerns regarding who will open the gate and when have been addressed in the Responses to Comments 37, 38, and 77 through 90. The proposed enhancements will improve the existing condition while still enabling fire and law enforcement to control the use of this emergency vehicle access.



## COMMENTS

## RESPONSES

- SI52B-103 cont. This proposal, covered in detail in other Sections within this Peer Review Assessment, contains a number of restrictive variables that limit its effectiveness:
- The emergency ingress-egress route is barricaded with a proposed electric gate and is not used for day-to-day access by the Fire Department and residents
  - The fire department will not have sufficient resources during incident stabilization operations to divert personnel to open the gate and allow egress from the combined subdivisions
  - The determination to open the gate will be performed by the Fire Department on a "case-by-case basis" during emergency operations
  - If the radio push-to-open system is used, does the City intend to provide every fire apparatus with the system? What is the cost of implementing this limited use device?
  - The Fire Department's current electric gate system has a mandated opening system manufacturer, which the push-to-open radio system may not be compatible
- SI52B-104 Pages 52- 62 Roadway Capacities and Evacuation Times
- The Evacuation Plan estimates the following evacuation conditions will exist for the combined communities in the immediate vicinity surrounding The Junipers project site:
- Approximately 5232 vehicles will be used to evacuate the area
  - Existing roads in the area flow 500 vehicles per hour, or eight (8) vehicles per minute
  - The evacuation traffic speed will be 2 mph
- SI52B-105 ***Finding:*** *Egress of 5232 vehicles from the combined subdivisions, at a flow rate of 500 vehicles per hour, will take a minimum evacuation period of 10.464 hours*
- SI52B-106 The Plan indicates that all vehicles in the existing The Glens subdivision used southbound Penasquitos Drive as the evacuation route during the 2007 Witch Fire incident.
- The Evacuation Plan states that The Junipers will provide the combined communities with a new evacuation route that will improve evacuation time by diverting some of the traffic off Penasquitos Drive and routing it through portions of The Junipers Road system.
- SI52B-107 ***Findings:*** *Diverting traffic into The Junipers road system via Private Road "P" is problematic for the following reasons:*
- Private Road "P" is blocked by barricading bollards that require removal prior to allowing either ingress into or egress from The Junipers roadway system
  - Other than having first responders or HOA representatives remove the bollards, there is no coordinating plan insuring that the bollards will be removed from the entrance at Private Road "P"
  - The exit point to Carmel Mountain Road at Private Road "V" is blocked by a gate that requires opening before evacuation egress can be accommodated.

SI52B-104 Comment noted. The comment accurately summarizes Evacuation Plan information.

SI52B-105 The comment utilizes 5,232 vehicles and divides by 500 vehicles per hour to determine that 10.46 hours would be required to move the vehicles at 2 miles per hour (mph). The comment neglects to consider that the total of 5,232 vehicles includes the project's improvements, and at least one additional evacuation route (south to Carmel Mountain Road) would be available and a third (to the north via the northerly emergency vehicle access) may be determined to be a viable option, depending on the nature of the emergency. Therefore, 10.46 hours is not accurate and as presented in the Evacuation Plan, Table 4, Section 4.2.1, the 5,232 vehicles would be divided roughly between the evacuation routes with 5.2 hours required using two of the routes and 3.5 hours if all three are utilized. Both of these scenarios represent an improvement over the current 8.3 hours with only Peñasquitos Drive being used.

SI52B-107  
cont.

- *There is no coordinated plan between the HOA and first responders to insure that this gate will be open in a timely manner*

#### Section 4.3 Evacuation Triggers

Evacuation Table 4 on Page 61 and the narrative for Section Roadway Capacities and Evacuation Times indicate that the combination of new evacuation routes provided by The Junipers sub-division will significantly improve evacuation times:

**Table 4**  
**The Glens and Junipers Evacuation Travel Timeframes\***

Scenario	Exits	Vehicles/Exit	Minimum Road Capacity (vehicles per hour)	Estimated Evacuation Travel Timeframe***
Existing Glens Community with Pefasquitos Drive (Figure 14)	1	4,160	500	8.3 hours
Glens Community with Junipers and new emergency evacuation road onto CMR (Figure 15)	2	2,616	500	5.2 hours
Glens Community with Junipers and northerly emergency evacuation route (Figure 16)	3	1,744	500	3.5 hours

\* Includes "wheels rolling" where all persons have left their home. Does not include notification, mobilization and travel out of the area.  
 \*\* Scenario 1 (Existing Glens Community) includes all residential, Pefasquitos Townhomes plus Cresta Bella Apartments, Rolling Hills Elementary, The Karlan Hotel and the Lutheran Church. Scenarios 2 and 3 include all of these plus the Junipers' vehicles.  
 \*\*\* Estimated evacuation travel timeframe is calculated by dividing the number of vehicles at 100% occupancy using each evacuation route by the route's lowest vehicle capacity.

SI52B-108

Section 4.3.1 on Page 69 indicates specific evacuation triggers should be considered for wildfire incidents occurring with a fifteen mile diameter of combined The Glens and The Junipers sub-divisions.

SI52B-109

During Red Flag Warning Periods, typical of Santa Ana-Northeast Wind Events, active fires within the "Green" threshold perimeter, which has a fifteen (15) mile diameter from the project site, should cause officials to consider an evacuation of the area. For fires within the "Red" threshold perimeter, with a three mile dimension from the Project, would indicate to officials that any in-progress evacuations should be stopped and converted to shelter-in-place strategy."

SI52B-106 Comment noted. The comment restates information presented in the Evacuation Plan.

SI52B-107 Comment noted. Refer to the Responses to Comments 38 and 39 for additional information regarding the use of gates and bollards to control emergency access.

SI52B-108 Comment noted. The comment restates evacuation time information from the Evacuation Plan.

SI52B-109 The Evacuation Plan states in Section 4.3.1 that wildfires encroaching into the inner trigger threshold on a Red Flag Warning Day "may include a decision to cease evacuations if already occurring in favor of temporary sheltering in properly fitted structures (Junipers)." There is no statement, as indicated in the comment, that "evacuations should be stopped and converted to shelter in place strategy." The comment also portrays a figure from the Evacuation Plan and measures the distances for the outer and inner decision points (triggers), without commenting on the adequacy or accuracy of the Evacuation Plan or EIR; no further response is required.

SI52B-109  
cont.



Excerpt from DUDEK Evacuation Plan Trigger Point Threshold Perimeters, Page

On analysis, the RED Trigger Point Perimeter extends approximately 42,662 feet from the Project Site, a distance of eight (8) miles.

On analysis, the GREEN Trigger Point Perimeter extends approximately 79,186 feet from the Project Site, a distance of 14.9973 miles.

#### **Discussion:**

Using the DUDEK estimated flame front rate of spread rate of 3.75 miles per hour, based on 2007 Witch Fire data and observations, and disregarding topographic features in wind-aligned drainages that will increase rates of burning and spread through native vegetation, the following fire spread to evacuation time rates were developed:

For a wildfire starting on Highway 67 slightly north of its intersection with Poway Road, a distance of eight miles, the fire front can potentially reach the project site in 2.13 hours during extreme conditions of a Santa Ana-Northeast Wind Event.

For a wildfire starting two miles south of SR-Highway 78 on the outskirts of the unincorporated community of Ramona, in close proximity to the point of origin of the 2007 Witch Fire, the flame front can potentially reach the project site in 3.99 hours during an extreme Santa Ana-Northeast wind event.

SI52B-110

SI52B-110 The commenter conducted an independent fire spread analysis and concluded from the Evacuation Plan trigger thresholds that a fire would arrive at the site before the Glens and Junipers can be evacuated. Although it is possible for the fire to burn through available fuels to the east/northeast of the project based on the fire spread rates used in the Evacuation Plan example, and in a timeframe that is shorter than the calculated travel times for the last vehicle leaving the greater Glens, the commenter neglects to acknowledge that there is no preserved open space north or east of the project for several miles (refer to aerial image below).

The impact of this is that fire spread would slow or cease, becoming spotty, and would not have a spread rate consistent with open space areas. The additional time



SI52B-110  
cont.

Scenario	Exits	Minimum Road Capacity	Vehicles Evacuating per Exit	Evacuation Time	Fire Arrival Time # RED Trigger Point	Fire Arrival # 2 GREEN Trigger Point	Deficit
Existing Road System	1	500 cars/hour	4160	8.3 hours	2.13 hours	3.99 hours	6.17 hours/1.86 hours
Combined Glens and Juniper Communities	2	500 cars/hour	2616	5.2 hours	2.13	3.99	2.99/1.21
Combined Communities with Northern Egress	3	500 cars/hour	1744	3.5 hours	2.13	3.99	+1.2/ 0.49

**Finding:** In a worst-case Santa Ana-Northeast Wind event wildfire scenario, the proposed evacuation routes do not permit effective and timely evacuation of the combined The Glens and The Junipers sub-divisions before an off-site flame front reaches the Project Area perimeters.

**Finding:** During the 2007 Witch Fire Complex incident, the Guejito fire, which merged into the Witch Fire perimeter, ignited at 0100 (1 a.m.) and traveled a distance of approximately six (6) miles in 2.75 hours before igniting multiple buildings in the northeast corner of the Rancho Bernardo community at approximately 0345 (3:45 am). This is a flame front spread rate of 2.18 miles per hour.

SI52B-111

**Finding:** At a spread rate of 2.18 miles per hour, a flame front for a fire starting eight miles from the Project Site would reach the subdivision perimeter in 3.6697 hours.

**Finding:** A flame front arrival of 3.6697 hours remains indicative that if two evacuation routes are provided, the combined communities will have deficient evacuation times available for residents. If three exit are provided, a ten minute margin after evacuation is completed will be available.

SI52B-112

**Finding:** The Evacuation Plan does not apparently take into consideration road conditions impacted by the evacuation of other areas surrounding the existing and proposed sub-divisions.

SI52B-113

#### **Section 8 Homeowners Association Wildfire Education Program**

**Finding:** This section does not raise any content or Code compliance issues.

SI52B-114

#### **Section 9 Conclusion**

Page 61

SI52B-110 (cont.) available for evacuation is considerable as the fire behavior would be drastically changed and would not include a flaming front approaching the Glens area. An evacuation can continue to occur under these conditions as the evacuees would not be evacuating in an exposed condition and they would be surrounded by developed landscapes. The comment's conclusion that the fire would reach the Glens community before everyone was able to evacuate is unfounded and fails to consider the vast developed and ignition-resistant landscapes that separate the community from the nearest, continuous open space areas. Further, the evacuation timeframes estimated in the Evacuation Plan are very conservative, assuming all residential household members are on site and that they would all evacuate at least two vehicles. This is a worst-case scenario and it is more likely that the evacuation times would be significantly lower than the estimates in the Evacuation Plan. Therefore, this comment does not raise any issues that have not been contemplated and addressed in the Evacuation Plan. For additional discussion of the effect of Santa Ana conditions with respect to fire management for the project, please refer to Section 2.2.5, *Climate*, of the FPP.

SI52B-111 The comment utilizes fire spread rates from area fires to compare against proposed evacuation travel time estimates. The comment neglects to indicate that if the same comparison were made with the existing condition, the evacuation travel time deficit is even more pronounced than with the project and its additional egress route to the south. The existing condition is improved with the project. Please also refer to the Responses to Comments 38 and 39, as well as Comment 16 in your previous letter SI52A, for additional details regarding the validity of the comparison given the lack of wildland fuels to the north and east of the project area and the overly conservative evacuation time estimates utilized within the Evacuation Plan.

## COMMENTS

## RESPONSES

	<p>SI52B-112 The comment asserts that the Evacuation Plan does not consider the potential for road conditions to be impacted by larger areas evacuating. The use of a very conservative 500 vehicles per hour evacuation rate results in an averaged vehicle speed of 2 mph. This approach conservatively builds in potential mass evacuation conditions. An average vehicle speed of 2 mph is therefore considered reasonable (the typical human walks between 2 and 3 mph) and achievable. The comment is therefore inaccurate and raises no new issues that have not been addressed in the Evacuation Plan. See Section 4.2 of the Evacuation Plan.</p> <p>SI52B-113 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.</p> <p>SI52B-114 Comment noted. As detailed within the preceding responses to comments for this comment letter and the associated FPPRA, the peer reviewer's noted code compliance issues were not accurate, not applicable, or unfounded. In some cases, the comments have resulted in clarification edits to the FPP and Evacuation Plan, but none of these revisions result in changes to the plans' conclusions or the project design. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.</p>
--	--

SI52B-114  
cont.

This FPP has been prepared for the Junipers Project. It is submitted in compliance with SDFRD's Fire Code. The recommendations in this document meet fire safety, building design elements, infrastructure, fuel management/modification, and landscaping recommendations of the applicable City codes and SDFRD policies. The recommendations provided in this FPP have been designed specifically for the proposed construction of structures within the vicinity of a fire hazard severity zone on the Junipers Project site. The Project site's fire protection system includes a redundant layering of protection materials, measures, and methods that have been shown through post-fire damage assessments to reduce risk.

**Finding:** The FPP Peer Assessment report has identified multiple compliance conflicts with the San Diego FD's fire prevention policies, California Fire Code, as amended and adopted by the City, and the San Diego Municipal Code.

SI52B-115

**Finding:** "... The recommendations provided in this FPP have been designed specifically for the proposed construction of structures within the vicinity of a fire hazard fire severity zones on The Junipers Project site..." This contradicts the narratives and concepts provided throughout the FPP, as the document claims, in multiple instances, that The Junipers is not within a VHFSA or WUI Area zone of influence. It also conflicts with the Findings listed immediately below.

Ignition resistant landscaping would occur throughout the site. Fuel modification is not required on the Project's perimeter as there are no wildland fuels directly adjacent the proposed residences. The site's landscaping will be maintained throughout each year and an inspection will be funded by the HOA to ensure compliance with this FPP and fire safe plant palettes, planting densities and spacing. The site's susceptibility to wildfire ignitions would be reduced post-project compared to its current condition.

SI52B-116

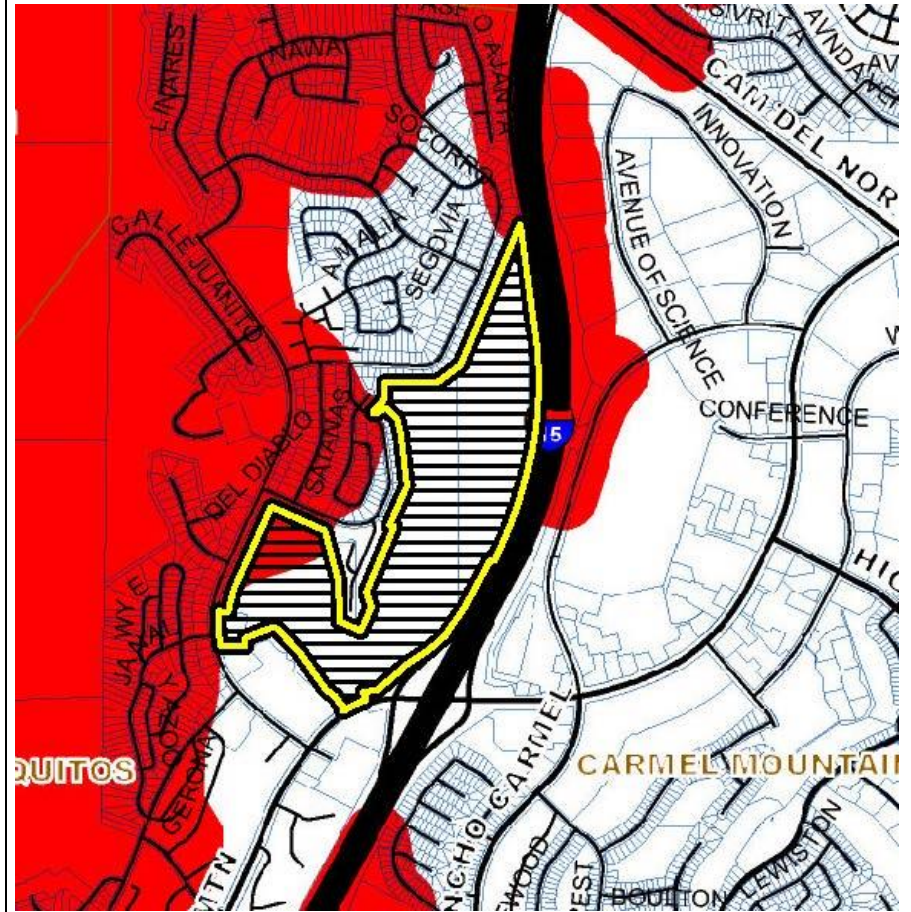
**Finding:** Government Code 51182 and CFC Chapter 49 require fuel modification zones within a City's political boundaries for each individual building within a sub-division.

**Finding:** The eastern perimeter of The Junipers subdivision borders the Interstate 15 right-of-way corridor, which has been designated by the City of San Diego as a Very High Fire Severity Area requiring fuel modification zones on the Project site.

**Finding:** Government Code 51182 and CFC Chapter 49 require implementation of fuel modification zones on all developed lands within a Wildland Urban Interface area, of which both The Glens and The Junipers sub-divisions have been, or will be, built, regardless of adjacency to combustible vegetation fuel beds.

SI52B-115 As explained in Responses to Comments 7, 30, 35, and 97, among others, the FPP indicates that the project does partially occur within a designated VHFHSZ. The FPP references in Sections 1.1 and 5.4.1 that a portion of the site, but not all of the site, is located within a City of San Diego VHFHSZ. This is illustrated in the official City map below in red. The referenced previous responses also explain that the FPP specifies that all structures will be built to the standards of Chapter 7A (Ignition Resistant Construction) of the California Building Code and San Diego's adopted version of that code. These requirements are confirmed to be implemented throughout the project. Therefore, this comment does not raise new issues or need for analyses that have not been addressed in the FPP or Evacuation Plan.





## COMMENTS

## RESPONSES

SI52B-116  
cont.

Ultimately, it is the intent of this FPP to recommend the construction of structures that are defensible from wildfire and, in turn, do not represent significant threat of ignition source for adjacent communities. During extreme fire conditions, there are no guarantees that a given structure will not burn. Fire safety measures identified in this report are designed to reduce the likelihood that fire would impinge upon the proposed structures. Wildfires may occur in the area that could damage property or harm persons. However, implementation of the recommendations in this FPP will substantially reduce the risk associated with this Project's wildfire hazard vicinity location.

This FPP does not provide a guarantee that all residents and visitors will be safe at all times because of the advanced fire protection features it requires. There are many variables that may influence overall safety. This FPP provides requirements and recommendations for

**Discussion:**

Due to the severity of impacts from the improper management of wild land areas, the existing laws are stringent and regulate all aspects of wild land fire including building standards, fuel modification, water availability/flow, and access.

SI52B-117

All new buildings and structures erected on the project site will be required to meet the CBC Building Code Chapter 7-A requirements for Wildland Urban Interface Areas and

Roof composition is an important factor in structural survivability. Fire resistant Class A roof coverings and assemblies are not clearly or thoroughly discussed in the FPP.

SI52B-118

A research study conducted by Howard in 1973 indicates that typical single family dwellings with non-combustible roofs and thirty-three (33) to sixty-six feet of fuel clearance have a 95% chance of survival (Howard, et.al.,1973).

A second research study in Santa Barbara County revealed that houses with a non-combustible roof and thirty-three to sixty feet of vegetation clearance had an 86% chance of survival (Foote, 1994).

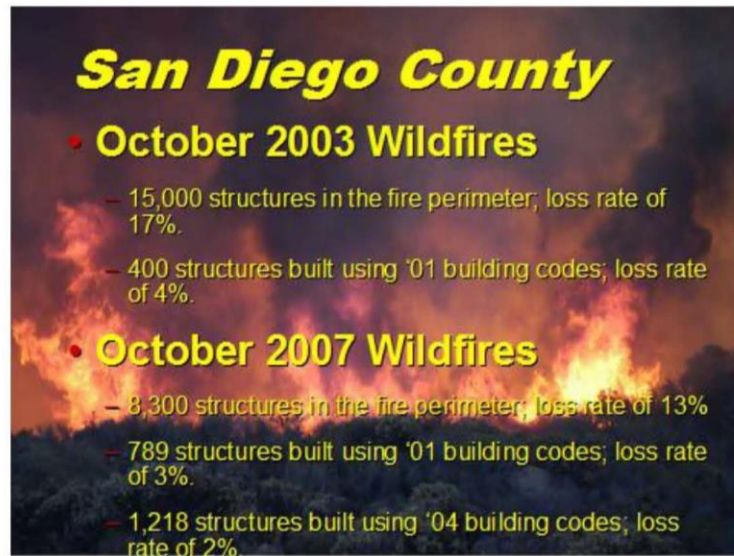
The proposed single family dwellings in The Junipers project should be required to have Class A non-combustible roof decks or assemblies.

SI52B-116 Please refer to Responses to Comments 7, 9, 10-12, 30, 35, 40, 96, and 97 regarding the City's determination that BMZ requirements do not apply to the project, as well as the incorporation of fire-resistive landscaping and building materials into the proposed project.

SI52B-117 Comment noted. As previously discussed, the FPP specifies CBC Chapter 7A compliance for all project structures. Refer to the Responses to Comments 6 through 13.

SI52B-118 Comment noted. The FPP in Section 1.1 and again in Section 6.4.1 indicates that all requirements of CBC Chapter 7A, which includes Class A roof systems, will be applied to all structures in the project.

SI52B-119



The above Power Point slide, from a presentation given to local Fire Prevention Officers by the San Diego County Fire Marshal's Office in 2008, indicates a 96 to 98% survivability rate for buildings erected under San Diego County Enhanced Fire Resistive Construction requirements during actual, extreme fire behavior conditions in similar and more hazardous vegetation types than found on the project site.

**Finding:** The San Diego County Enhanced Fire Resistive Construction standards developed after the Cedar, Witch and Harris Fires were, in a cooperative effort between the San Diego County Fire Marshal's Office and a California State Fire Marshal's Office committee, incorporated into the prescriptive regulations of CBC Chapter 7-A.

SI52B-120

The building standards proposed by this Fire Protection Plan should provide a reasonable degree of ignition resistant buildings at the project site and reduce the Significant Impact caused by less resistive construction standards.

Fire behavior, under most of the proposed FPP mitigations strategies, should be expected to significantly diminish when a wildfire encroaches into Fuel Modification Zones on property lines exposed to off-site unmanaged vegetative fuels.

SI52B-121

Vegetation management beyond a structure's immediate vicinity has little effect on house ignitions unless a minimal break of continuous surface fuels is maintained around

SI52B-119 The comment and associated graphic are noted. The comment raises no new issues or need for analysis and is consistent with the requirements and recommendations provided in the FPP.

SI52B-120 Comment noted. The FPP recommends incorporation of fire-resistive building and landscape materials/designs to provide a more fire resistive community. See the Response to Comment 7.

SI52B-121 Comment noted. The comment provides general wildfire information and raises no issues or need for additional analysis not already addressed in the project's FPP.



## COMMENTS

## RESPONSES

SI52B-121  
cont.

the perimeter of the house. For this reason, home site protection includes eliminating continuous ground fuels that lead from wild land fuel beds to the house. This can be accomplished with rock landscaping, cement sidewalk, green grass or by removing dried vegetation and tree needles (Jack Cohen, USFS).

In 1997, Cohen conducted a full-scale experiments that revealed that a typical Type V-B combustible wall thirty-three feet from a crown fire in 43 foot (13 meter) tall Black Spruce trees. These fires produced flame heights of 20 meters or 65.616 feet. Twenty meter long flame heights are produced by a 100 megawatt fire. The walls on the test site only ignited when actually touched by flames.

These full-scale fire tests are the basis for the 100 foot wide Fuel Modification Zones mandated by the City of San Diego.

While not directly impacting The Junipers sub-division, the off-site Coastal Sage shrub and chaparral environments west of the Project site will produce a 3.5502631035 megawatt fire. This heat energy release rate is approximately 3% of the energy produced by Cohen's full scale test fires.

The BEHAVE Fire Modeling calculation for the Project Site indicate that a wild fire moving through Fuel Model 1-GR-1 native and invasive species annual grasses will produce a Fire Line Intensity of 115 BTU/foot/second (Consultant's fire modeling output results).

This value can be anecdotally applied to irrigated lawns and used to determine ignition times for residential construction materials by using various formulas and tables.

For example, using the formula:

$$t_{ig} = \pi kpc (T_{ig} - T_o) / 2q_e \quad (\text{National Fire Academy } Fire \text{ Dynamics pg. 5-3})$$

SI52B-122

where

$t_{ig}$  = time to ignition, seconds

kpc = thermal inertia of material

$T_{ig}$  = temperature of ignition source

$T_o$  = surface temperature of exposed material

$q_e$  = incident heat flux to the material

The ignition time of solid materials can be estimated.

For a gypsum based one hour fire resistive or non-combustible stucco plaster wall (as required by Chapter 7A of the California Building Codes), with a surface temperature of 100 degrees (solar exposure), having a kpc of  $5.8 \times 10^5 q_e$  (*Fire Dynamics*, pg. 2-15), exposed to radiative heat from a flame front thirty feet (30') away producing 115 BTUs, ignition time would be 41,887,600 seconds (116,355 minutes or 19,392 hours or 53 days).

SI52B-122 Comment noted. The comment provides wildfire heat output information and raises no issues or need for additional analysis not already addressed in the project's FPP. The comment is consistent with the FPP findings that fire behavior at the project site will not produce heat intensity to compromise the planned structures.

BEHAVE Fire Modeling Calculation indicates that non-irrigated Fuel Model 1/GR-1 light fuels under worst case 2003 Cedar Fire Event burning conditions will produce 2868 BTUs, equivalent to 840.324 watts or **.840324 kilowatts**.

Referring to *Fire Dynamics* Figure 2-5 *Damage Caused by Radiation* below, the calculated fire crossing into The Junipers Project Site from the adjacent properties, with the potential ignition of landscaped lawns, will not produce sufficient radiant heat to cause significant damage of proposed new single family dwellings.

Damage Description	Heat Flux – kW/m <sup>2</sup>
Skin burns	4.7 to 5.0
Pain threshold	1.5
Pain at one minute	2.1
Plastic melts	12.0
Cable insulation degrades	18.0 to 20.0
<b>Piloted ignition occurs:</b>	
<b>Wood</b>	<b>14.6</b>
<b>Painted Wood</b>	<b>16.7</b>
<b>Wood spontaneously ignites</b>	<b>33.5</b>

Type of Heat Exposure	Heat Flux Value
Flame Radiation	0-200 kW/m <sup>2</sup>
Flame Convection	10-20 kW/m <sup>2</sup>
Hot Gas Convection	0-10 kW/m <sup>2</sup>
Hot Gas Radiation	0-150 kW/m <sup>2</sup>

*Table 5.5 Heat Flux Direct Contact Values, NFA Fire Dynamics*

Fire behavior will change when the flame front transitions into the irrigated grass landscaping.

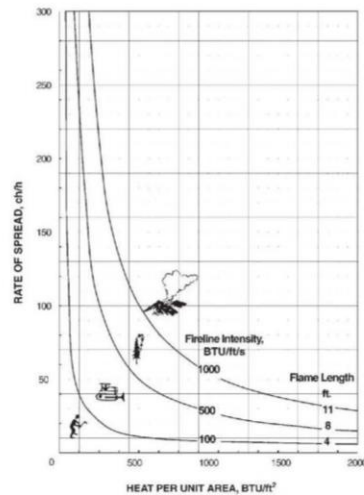
Irrigated lawns, as proposed as part of the defensible space guidelines for the project, will have a fuel moisture content of at least 120%. Fuel moisture contents of 120% result in green, non-cured vegetation, with all herbaceous materials remaining in the “live” fuel categories.

As a result, according anecdotal information from some FPP consultants and Fire Protection Engineers, grassy fuels with high fuel moistures will produce flame lengths of one (1') or less and have a rate of spread of approximately 5 chains (330 feet) per hour when exposed to a 20 m.p.h. mid-flame wind.

BEHAVE fire modeling does not permit a fuel moisture input of 120% for grassy vegetation. The maximum fuel moisture input value for this fuel type is 60%. Fire modeling using this data results in no (0 feet) of flame spread per hour and no flame

lengths. Lawns and landscaping irrigated to 60% internal fuel moisture are essentially unburnable.

The fire behavior characteristics of irrigated grass fuels is well within the capabilities of fire suppression forces using non-mechanized firefighting tools to control fires in this vegetation type. The change of burning characteristics and intensity as fire moves across the grassy fuels will provide more opportunities for responding resources to take defensive suppression action at the established Fuel Modification Zones around The Junipers sub-division buildings. (see the Fire Behavior Characteristics Chart below).



#### **Determinations:**

1. Portions of The Junipers Fire Protection Plan demonstrates compliance with the applicable regulations.
2. The Code and Standards compliant portions of the FPP *should*, as indicated in the Conclusion Section, provide adequate compliance with codes/regulations and CEQA EIR requirements for mitigating Significant Impacts from wildfire exposure
3. The FPP provides deficient mitigations for the following Wildfire Significant Impacts:
  - Secondary Access for overlength streets within the subdivision Project Area

SI52B-123 The FPP is fully compliant with applicable regulations, as described throughout the preceding responses to comments and documented in the FPP.

SI52B-124 Comment noted. Because of the project's compliance with applicable codes and regulations, and the provision of additional evacuation routes, thereby reducing evacuation time compared to the existing condition, the project would not have a significant impact and no mitigation would be required. This is evaluated in Section 5.14, *Health and Safety*, of the EIR.



## COMMENTS

## RESPONSES

SI52B-125 The EIR adequately addresses the topic of evacuation and demonstrates that evacuation times would improve with the project, compared to the existing condition. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the EIR, and no mitigation related to evacuation is required. Additional discussion/clarification is provided in Responses to Comments 57 and 124.

## COMMENTS

## RESPONSES

SI52B-126	<ul style="list-style-type: none"> <li>• Ineffectual emergency egress from the Project Site due to barricades, bollards and gated access points reliant on HOA or first responder actions for opening</li> </ul>	SI52B-126	The comment presents an incorrect conclusion that emergency egress from the site would be ineffectual, due to gates and bollards. Please refer to the Responses to Comments 37 through 39, 59, 70, 76 through 87.
SI52B-127	<ul style="list-style-type: none"> <li>• Potentially deficient Defensible Space-Fuel Modification Zone design, based on the perception that the sub-division site is not located within, or adjacent to, a Wildland Urban Interface Space or City designated Very High Fire Severity Area</li> </ul>	SI52B-127	The FPP identifies that portions of the project site are designated as VHFHSZ and WUI. The City has determined that the project is not within 100 feet of an adjacent wildland fuel area and is not required to incorporate defensible space/fuel modification zones. Nevertheless, the project will incorporate fire-resistive building materials and landscaping in recognition of the potential for ignition from windblown embers from more distant fires. Please also refer to the Responses to Comments 7, 9, 10 through 12, and 20.
SI52B-128	<ul style="list-style-type: none"> <li>• Ineffectual evacuation design of The Junipers sub-division and the developed community surrounding the new Project.</li> </ul>	SI52B-128	The applicant is responsible for the design of the project and the planned off-site improvements to roadways and evacuation routes. The project would be implemented in conformance with City fire codes and would result in an improvement over existing emergency evacuation conditions, because it would add two currently unavailable emergency evacuation routes and reduce evacuation times for Junipers and Glens residents by as much as 4.8 hours. This means that from a CEQA standpoint, the project would provide a benefit with respect to an emergency evacuation from a fire event, with no significant impacts identified and no mitigation required. Please also refer to EIR Section 5.14, <i>Health and Safety</i> , as well as the preceding Responses to Comments 18, 37, 38, 43 through 47, 63 through 89, 96, 100, and 105-114.
SI52B-129	<p><b>Finding:</b> <i>The remaining content of the Conclusion is industry-standard narrative and section does not raise any specific content or Code compliance issues.</i></p> <p><b>Section 10 Limitations</b></p> <p><b>Finding:</b> <i>This section does not raise any content or Code compliance issues</i></p> <p><b>FPPRA CONCLUSIONS</b></p> <p>The Peer Assessment Review process indicates that there are serious deficiencies in the proposed mitigations related to CEQA Significant Impacts related to wild fire safety as required for new residential developments. These deficiencies encompass several categories:</p> <ul style="list-style-type: none"> <li>• Non-compliance with prescriptive requirements from State and local codes, ordinances and policies</li> <li>• Minimalization of vegetation management and defensible space requirements and implementations</li> <li>• Failure to recognize that The Junipers Project resides within a Wildland Urban Interface area and that portions of the development site are within a Very High Fire Severity Area</li> <li>• Ineffective secondary access roadway systems</li> <li>• Proposed roadway systems that are effectively barricaded by bollards and gates requiring human intervention in the event evacuations are ordered during major fast-moving and dynamic wild fire incidents</li> <li>• Evacuation points that require fire department interventions for residents' use when resources should be committed to incident stabilization and firefighting operations instead of providing logistical support for the community</li> <li>• Evacuation egress points that are rendered useless because they are not used on a daily basis by residents, violating the Affiliation Principle of fire-related human behavior research</li> <li>• Evacuation times exceeding the potential time frames from fires occurring during extreme Santa Ana-Northeast wind events will reach and potentially reach and overrun the combined communities and established egress routes</li> </ul>		

## COMMENTS

## RESPONSES

	<p>SI52B-129 Comment noted. The comment does not identify any concerns regarding the adequacy or accuracy of the EIR or FPP. No response is required.</p> <p>SI52B-130 As presented in the FPP and the Evacuation Plan and throughout the preceding responses to comments, no valid deficiencies were presented. Where clarifications were deemed necessary, they have been provided in the FPP and/or Evacuation Plan. None of these modifications altered the conclusions of these plans or the EIR. Additionally, Section 5.14.3 of the EIR analyzed potential impacts related to fire risk, and concluded that no significant impacts would occur and no mitigation would be required. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the EIR, FPP or Evacuation Plan.</p> <p>SI52B-131 The project includes landscaping that is consistent with all applicable requirements for vegetation management and defensible space, as explained in many of the preceding responses, including the Responses to Comments 7 through 13. The FPP recommends incorporation of fire resistive materials/construction into all project landscaping and structures. This has been clarified in the FPP and Evacuation Plan, as was also indicated in the preceding responses to comments. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.</p> <p>SI52B-132 As explained throughout the preceding responses to comments, including Responses to Comments 7, 30, 35, and 97, the FPP noted that portions of the project site are within VHFHSZ areas and specified conformance with Chapter 7A building ignition resistance for the entire project.</p>
--	---

## COMMENTS

## RESPONSES

	<p>SI52B-132 (cont.) Clarification regarding the site's relationship to the generally mapped WUI area has been provided in the FPP, as was also indicated in previous responses.</p> <p>SI52B-133 Please refer to the responses to Comments 14 and 16, which explain the effectiveness of the secondary emergency access roadways. From a CEQA standpoint, please note that the proposed enhancements and improvements provide a condition that is superior to the existing condition. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.</p> <p>SI52B-134 As explained in Responses to Comments 37 through 39, and 63 through 87, the designs of the emergency access gates and bollards associated with the project would meet the combined requirements of SDFRD and City engineers. They are expected to be effective, and will result in improved emergency access and evacuation conditions for the Glens community. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.</p> <p>SI52B-135 The comment presumes that fire personnel would be opening gates. As the commenter noted in a previous comment and as described in the Evacuation Plan, law enforcement is in charge of on-scene evacuations and would likely be responsible for opening gates and removing bollards on routes that they deem essential. Please refer to the Responses to Comments 83 through 87 and 107. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.</p>
--	--

## COMMENTS

## RESPONSES

- SI52B-136 The comment relies upon one study to support its conclusions. The Evacuation Plan provides numerous counter references that support orderly, predictable evacuations under the direction of law enforcement. Please refer to the Responses to Comments 37, 38, 124 and 125. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.
- SI52B-137 As explained in Response to Comment 110, this comment is incorrect, based on the actual non-linear fire progression speed, non-continuous fuelbeds, and the lack of wildland fuels to the north and northeast of the project site for two to several miles. The result is that wildfire would not be expected to impact the project site as it would urban periphery areas to the north and northeast at great distances from the project. Therefore, this comment does not raise new issues or need for analysis that have not been addressed in the FPP or Evacuation Plan.

## COMMENTS

## RESPONSES

SI52B-138

Given that major Wildfire Significant Impacts have not been effectively mitigated, the Fire Protection and Evacuation Plans for The Junipers sub-division requires additional development before the Fire Authority Having Jurisdiction can be reasonably assured that its contents provide an acceptable level of fire and life safety for the new community.

Respectfully submitted,

J. Charles Weber, CFPS # 3414  
Fire and Life Safety Consultant

SI52B-138 The project FPP and Evacuation Plans are not required documents but were prepared and submitted by the applicant as part of a proactive and cautious approach to wildfire safety. The project is required to conform with all applicable building codes and regulations, including considerations related to the VHFHSZ and WUI zones that cross portions of the site. The presence of these zones and the required conformance with Section 7A was covered by the FPP, which has been clarified further as noted in the preceding responses to comments. These minor modifications do not alter the analysis or conclusions of the FPP and Evacuation Plan. Compliance with regulatory requirements is not a CEQA mitigation measure; because compliance is required, no significant impacts would occur and no mitigation measures are needed as stated in the EIR Section 5.14, *Health and Safety*. Furthermore, as described in the preceding Responses to Comments, the project would result in an improvement over existing emergency evacuation conditions, because it would add two currently unavailable emergency evacuation routes and reduce evacuation times for Junipers and Glens residents by as much as 4.8 hours. The project would provide a benefit with respect to an emergency evacuation from a fire event, and the EIR Section 5.14, determined there were no significant impacts and no mitigation required.



## REFERENCES

### **National Wildfire Coordinating Group Publications:**

*Standard Fire Behavior Fuel Models: A Comprehensive Set for Use with Rothermel's Surface Fire Spread Model*, General Technical Report RMRS-GTR-153. June 2005. Joe H. Scott, Robert E. Burgan, United States Department of Agriculture - Forest Service, Rocky Mountain Research Station, Missoula, Montana.

*BEHAVE PLUS: Fire Modeling System Version 5.0.3* April 5, 2010. Patricia L. Andrews, United States Department of Agriculture - Forest Service, Rocky Mountain Research Station – Fire Sciences Lab, Missoula, Montana and Collin D. Bevins, System for Environmental Management, PO Box 8868, Missoula, Montana, 59807. Web site: <http://fire.org/>

National Wildfire Coordinating Group - *S-290 Intermediate Fire Behavior* Manual

National Wildfire Coordinating Group – *S-390 Introduction to Wildfire Calculations* Manual

*Aids to Determining Fuel Models for Estimating Fire Behavior*, Hal E. Anderson, United States Department of Agriculture Forest Service Intermountain Forest and Range Experiment Station General Technical Report INT-122, April 1982

*Physics-Based Modeling for WUI Fire Spread – Simplified Model Algorithm for Ignition of Structures by Burning Vegetation*, USDA Fire Research Division, NISTIR 7179

### **NFPA Publications:**

National Fire Protection Association - NFPA 13-D, *Standard for the Installation of Sprinkler Systems in One – and Two-Family Dwellings and Manufactured Homes*, 2010 and 2013 Editions.

National Fire Protection Association – NFPA 13, *Standard for the Installation of Automatic Fire Sprinklers*

National Fire Protection Association - NFPA 1142 *Standard on Water Supplies for Suburban and Rural Fire Fighting*, 2012 Edition.

National Fire Protection Association - NFPA 1144 *Standard for Reducing Structure Ignition Hazards from Wildfire* (2008).

National Fire Protection Association - NFPA 1141, 2008 Edition. Table C.11 (b) Time-Distance Table Using an Average Speed of 35 mph.

National Fire Protection Association Pamphlet 299 *Protection of Life and Property from Wildfire*

National Fire Protection Association *Assessing Structure Ignition Potential from Wildfire*

### **State of California Regulatory Documents**

California Code of Regulations, Title 14, Natural Resources, SRA Requirements

California Public Resources Codes sections 4201 through 4204

California Government Code, sections 51175 through 51189.

2016 California Fire Code, CCR Title 24 Part 9, including Local Amendments and Appendices

2019 California Fire Code, CCR Title 24, Part 9

2016 California Building Code, CCR Title 24, Part 2

2019 California Building Code, CCR Title 24, Part 2

*The California State and Local Responsibility Area Fire Hazard Severity Zone Map.*

### **Local Codes, Ordinances and Policies**

City of San Diego Municipal Code, Chapter 5, Article 5: Fire Protection and Prevention

San Diego Fire Dept Fire Prevention Policy Bureau (FPB) A-00-9 *Access Roadways, Modified Roadway Surfaces*

SDFD FPB A-14-1 *Fire Apparatus Access Roadways*

SDFD FPB A-14-10 *Fire Access Roadways, Existing Streets*

SDFD FPB K-15-2 – *Knox Product Requirements and Ordering Procedures*

SDFD FPB B-08-01 *Brush Management Regulations*

SDFD FPB B-18-01 *Mitigations for Reduced Brush Management Zones*

City of San Diego Municipal Code, Article 2, Landscaping Regulations

City of San Diego Street Design Manual, March 2017 Edition

SDFD Designated Very High Fire Severity Area Maps

2017 San Diego County Consolidated Fire Code

County of San Diego *Guidelines for Determining Significance and Report Format and Contents Requirements*, San Diego County DPLU Land Use and Environment Group, Second Revision, August 31, 2010

San Diego County General Plan, Chapter 7 – Safety Element

San Diego County Ordinance 10147, Title 6, Chapter 4, Division 8 – *Defensible Space Ordinance for Fire Protection*

**Other References:**

*An Introduction to Fire Dynamics*, 3<sup>rd</sup> Edition, Dougal Drysdale, John Wiley & Sons LTD Publications, 2011

*Structural Design for Fire Safety*, 2<sup>nd</sup> Edition, Andrew H. Buchanan, John Wiley & Sons LTD Publications, 2017

*SFPE Handbook of Fire Protection Engineering*, 5<sup>th</sup> Edition, Morgan J Hurley Editor-in-Chief, Springer Publications, 2016

*Fire Dynamics Course Guide*, FEMA/USFA/NFA Publication, May 1999

*Fire, Chaparral and Survival in Southern California*, Richard W Halsey, Sunbelt Publications, 2005

*Wildland-Urban Interface Code*, 2018 Edition, International Code Council

2009 *International Wildland Urban Interface Code*, International Code Council

*San Diego County Native Plants* Third Edition, James Lightner

*Multiple Species Conservation Program, County of San Diego Subarea Plan*, October 22, 1997

*County of San Diego Vegetation Management Report*, March 25, 2009

NIST Technical Note 1635 – *A Case Study of a Community Affected by the Witch and Guejito Fires*, April 2009, Rancho Bernardo, The Trails Community

*Building Fire Performance Analysis*, Robert W Fitzgerald, 2004

# **The Junipers Project**

## **Final Environmental Impact Report**

SCH No. 2018041032; Project No. 586670

**January 2021**

*Prepared for:*

**City of San Diego**  
Development Services Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

# The Junipers Project

## Final Environmental Impact Report

### TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
S SUMMARY .....	S-1
S.1 Project Synopsis .....	S-1
S.1.1 Project Location and Setting.....	S-1
S.1.2 Project Objectives .....	S-2
S.1.3 Project Description .....	S-3
S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects .....	S-5
S.3 Areas of Controversy .....	S-5
S.4 Issues to be Resolved by the Decision-Making Body .....	S-6
S.5 Project Alternatives.....	S-6
S.5.1 No Project/No Development Alternative .....	S-6
S.5.2 No Project/Development Per Community Plan Alternative .....	S-7
S.5.3 Reduced Intensity Development Alternative.....	S-8
S.5.4 Environmentally Superior Alternative .....	S-10
1.0 INTRODUCTION .....	1-1
1.1 Project Background .....	1-1
1.2 Project Scope .....	1-1
1.3 Purpose and Legal Authority .....	1-2
1.4 Environmental Impact Report Scope .....	1-2
1.4.1 Notice of Preparation/Scoping Meeting .....	1-3
1.5 Public Review Process .....	1-3
1.6 Content and Organization of the EIR.....	1-4
2.0 ENVIRONMENTAL SETTING .....	2-1
2.1 Project Location.....	2-1
2.2 Existing Site Conditions .....	2-1
2.3 Surrounding Land Uses.....	2-2
2.4 Planning Context.....	2-2
2.4.1 City of San Diego General Plan .....	2-2
2.4.2 Rancho Peñasquitos Community Plan.....	2-3
2.4.3 Multiple Species Conservation Program.....	2-3
2.4.4 Zoning.....	2-3
2.4.5 Airport Land Use Compatibility Plans .....	2-4
2.4.6 Regional Air Quality Strategy.....	2-4
2.4.7 Water Quality Control Plan for the San Diego Basin .....	2-5

3.0	PROJECT DESCRIPTION .....	3-1
3.1	Project Goals and Objectives.....	3-1
3.2	Background/Orientation .....	3-1
3.3	Project Characteristics.....	3-2
3.3.1	Project Components .....	3-3
3.3.2	Construction .....	3-16
3.4	SDG&E Facilities Modifications.....	3-19
3.5	Discretionary Actions.....	3-19
4.0	HISTORY OF PROJECT CHANGES.....	4-1
5.0	ENVIRONMENTAL ANALYSIS .....	5.1-1
5.1	Land Use.....	5.1-1
5.1.1	Existing Conditions .....	5.1-1
5.1.2	Impact 1: Potential Conflicts with General or Community Plans and Potential Need for a Deviation or Variance .....	5.1-36
5.1.3	Impact 2: Potential Exposure to Excessive Noise Levels .....	5.1-52
5.2	Transportation/Circulation .....	5.2-1
5.2.1	Existing Conditions .....	5.2-1
5.2.2	Impact 1: Potential for Traffic Congestion .....	5.2-8
5.2.3	Impact 2: Potential for Traffic Hazards .....	5.2-26
5.2.4	Impact 3: Alternative Transportation .....	5.2-28
5.3	Visual Effects/Neighborhood Character .....	5.3-1
5.3.1	Existing Conditions .....	5.3-1
5.3.2	Impact 1: Scenic Vistas .....	5.3-8
5.3.3	Impact 2: Development Features.....	5.3-11
5.3.4	Impact 3: Neighborhood Character.....	5.3-21
5.3.5	Impact 4: Landform Alteration .....	5.3-30
5.3.6	Impact 5: Light and Glare.....	5.3-33
5.4	Noise.....	5.4-1
5.4.1	Existing Conditions .....	5.4-1
5.4.2	Impact 1: Exposure to Operational and Construction Noise .....	5.4-4
5.4.3	Impact 2: Ambient Noise.....	5.4-8
5.4.4	Impact 3: Vibration.....	5.4-10
5.5	Air Quality.....	5.5-1
5.5.1	Existing Conditions .....	5.5-1
5.5.2	Impact 1: Air Quality Management Plan Consistency .....	5.5-10
5.5.3	Impact 2: Criteria Pollutant Emissions .....	5.5-12
5.5.4	Impact 3: Sensitive Receptors .....	5.5-16
5.5.5	Impact 4: Odors.....	5.5-19



5.6	Greenhouse Gas Emissions .....	5.6-1
5.6.1	Existing Conditions .....	5.6-1
5.6.2	Impact 1: Generation of GHG Emissions and Climate Action Plan Consistency .....	5.6-7
5.7	Energy .....	5.7-1
5.7.1	Existing Conditions .....	5.7-1
5.7.2	Impact 1: Potential for Wasteful Energy Use .....	5.7-14
5.8	Biological Resources .....	5.8-1
5.8.1	Existing Conditions .....	5.8-1
5.8.2	Impact 1: Sensitive Species and Habitats .....	5.8-11
5.8.3	Impact 2: Wildlife Corridors .....	5.8-16
5.8.4	Impact 3: Local Plans and Policies .....	5.8-16
5.8.5	Impact 4: Invasive Species .....	5.8-18
5.9	Hydrology and Water Quality .....	5.9-1
5.9.1	Existing Conditions .....	5.9-1
5.9.2	Impact 1: Impervious Surfaces and Runoff .....	5.9-10
5.9.3	Impact 2: Potential for Drainage Alteration .....	5.9-13
5.9.4	Impact 3: Flood Hazards .....	5.9-14
5.9.5	Impact 4: Potential for Pollutant Discharge and Water Quality .....	5.9-15
5.10	Geology and Soils .....	5.10-1
5.10.1	Existing Conditions .....	5.10-2
5.10.2	Impact 1: Potential for Geologic Instability .....	5.10-11
5.10.3	Impact 2: Potential for Erosion and Sedimentation .....	5.10-15
5.10.4	Impact 3: Potential for Geologic Hazards .....	5.10-16
5.11	Historical and Tribal Cultural Resources .....	5.11-1
5.11.1	Existing Conditions .....	5.11-1
5.11.2	Impact 1: Prehistoric and Historic Resources .....	5.11-9
5.12	Public Utilities .....	5.12-1
5.12.1	Existing Conditions .....	5.12-1
5.12.2	Impact 1: Potential Increased Demand on Utilities .....	5.12-8
5.13	Public Services and Facilities/Recreation .....	5.13-1
5.13.1	Existing Conditions .....	5.13-1
5.13.2	Impact 1: Potential for Inadequate Public Service Facilities .....	5.13-7
5.14	Health and Safety .....	5.14-1
5.14.1	Existing Conditions .....	5.14-1
5.14.2	Impact 1: Health Hazards .....	5.14-10
5.14.3	Impact 2: Fire Risk .....	5.14-14
5.14.4	Impact 3: Emergency Response/Evacuation .....	5.14-15
5.14.5	Impact 4: Airport Hazards .....	5.14-18

6.0	CUMULATIVE IMPACTS.....	6-1
6.1	Cumulative Effects Found to be Significant.....	6-2
6.2	Cumulative Effects Found Not to be Significant .....	6-2
6.2.1	Land Use.....	6-2
6.2.2	Transportation/Circulation .....	6-3
6.2.3	Visual Effects/Neighborhood Character .....	6-4
6.2.4	Noise .....	6-5
6.2.5	Air Quality.....	6-8
6.2.6	Greenhouse Gas Emissions.....	6-9
6.2.7	Energy.....	6-10
6.2.8	Biological Resources.....	6-10
6.2.9	Hydrology and Water Quality .....	6-11
6.2.10	Geology and Soils.....	6-12
6.2.11	Historical and Tribal Cultural Resources.....	6-13
6.2.12	Public Utilities .....	6-14
6.2.13	Public Services and Facilities/Recreation .....	6-15
6.2.14	Health and Safety.....	6-16
7.0	OTHER CEQA SECTIONS.....	7-1
7.1	Effects Found Not to be Significant .....	7-1
7.1.1	Agriculture and Forestry Resources .....	7-1
7.1.2	Mineral Resources .....	7-1
7.1.3	Paleontology.....	7-2
7.1.4	Population and Housing .....	7-3
7.1.5	Schools .....	7-4
7.2	Growth Inducement.....	7-4
7.2.1	Introduction .....	7-4
7.2.2	Short-term Effects.....	7-4
7.2.3	Long-term Effects.....	7-5
7.3	Significant Environmental Effects Which Cannot Be Avoided If the Proposed Project Is Implemented .....	7-6
7.4	Significant Irreversible Environmental Changes.....	7-6
8.0	PROJECT ALTERNATIVES.....	8-1
8.1	Introduction .....	8-1
8.2	Summary of Project Objectives and Significant Effects .....	8-1
8.2.1	Project Objectives .....	8-1
8.2.2	Significant Impacts of the Proposed Project .....	8-2
8.3	Alternatives Considered But Rejected.....	8-3
8.3.1	Project Location Alternative .....	8-3
8.3.2	Development in Accordance with Existing Zoning Alternative .....	8-4
8.4	Proposed Project Alternatives.....	8-5
8.4.1	No Project/No Development Alternative .....	8-6
8.4.2	No Project/Development Per Community Plan Alternative .....	8-11
8.4.3	Reduced Intensity Development Alternative.....	8-19
8.5	Environmentally Superior Alternative .....	8-25

9.0	MITIGATION, MONITORING AND REPORTING PROGRAM .....	9-1
10.0	REFERENCES .....	10-1
11.0	INDIVIDUALS CONSULTED/PREPARERS .....	11-1

## LIST OF APPENDICES

Appendix A	Notice of Preparation, Response Letters, Scoping Meeting Sign-in Sheet, Scoping Meeting Transcript
Appendix B	Transportation Impact Analysis and Trigger Analysis Memo
Appendix C	Acoustical Analysis Report
Appendix D	Air Quality Technical Report
Appendix E	Greenhouse Gas Emissions Technical Report (including CAP Checklist)
Appendix F	Biological Resources Letter Report
Appendix G1	Drainage Study
Appendix G2	Storm Water Quality Management Plan
Appendix H	Geotechnical Investigation
Appendix I1	Archaeological Resources Report Form (excludes Confidential Appendices)
Appendix I2	Former Carmel Highlands Golf Course Built Environment Assessment
Appendix I3	AB 52 Documentation
Appendix J1	Water Supply Assessment
Appendix J2	Private Water System Analysis
Appendix J3	Sewer System Analysis
Appendix J4	Waste Management Plan
Appendix K1	Phase I Environmental Site Assessment, Carmel Highland Golf Course
Appendix K2	Phase I Environmental Site Assessment, Vacant Land, Unassigned Address
Appendix K3	Asbestos and Lead-Based Paint Investigation
Appendix K4	Wildland Fire Evacuation Plan
Appendix K5	Fire Protection Plan
Appendix L	Paleontological Records Search

## LIST OF FIGURES

<b><u>No.</u></b>	<b><u>Title</u></b>	<b><u>Follows Page</u></b>
2-1	Regional Location.....	2-6
2-2	Project Location and Vicinity .....	2-6
2-3	Existing Topography .....	2-6
2-4	Project Site Aerial.....	2-6
2-5	Project Site Boundaries Following 2018 Lot Line Adjustments .....	2-6
2-6	Existing Zoning Classifications .....	2-6
3-1	Illustrative Site Plan .....	3-24
3-2	Proposed Site Plan Overview .....	3-24
3-3	Proposed Lot Detail and Zoning .....	3-24
3-4a	Single Detached 50x90 Residential Units Sample Street Front .....	3-24
3-4b	Single Detached 50x90 Residential Units Sample Typical Plan 1 Variations and Elevations .....	3-24
3-4c	Single Detached 50x90 Residential Units Sample Typical Plan 2 Variations and Elevations .....	3-24
3-4d	Single Detached 50x90 Residential Units Sample Typical Plan 3 Variations and Elevations .....	3-24
3-4e	Single Detached 50x90 Residential Units Sample Typical Plan 4 Variations and Elevations .....	3-24
3-5a	Duplex Residential Units Sample Street Front.....	3-24
3-5b	Duplex Residential Units Building 1 Variations and Elevations .....	3-24
3-5c	Duplex Residential Units Building 2 Variations and Elevations .....	3-24
3-5d	Duplex Residential Units Building 3 Variations and Elevations .....	3-24
3-6a	Six-Plex Residential Units Sample Street Front.....	3-24
3-6b	Six-Plex Residential Units – Street and Motorcourt Elevations .....	3-24
3-6c	Six-Plex Residential Units Plan 1 & 2 Variations and Elevations.....	3-24
3-6d	Six-Plex Residential Units Plan 1 & 2x Variations and Elevations.....	3-24
3-6e	Six-Plex Residential Units Plan 3 Variations and Elevations.....	3-24
3-6f	Six-Plex Residential Units Plan 3x Variations and Elevations.....	3-24
3-7a	Affordable Housing Street Front.....	3-24
3-7b	Affordable Housing Elevations.....	3-24
3-8	Mobility Zone, Bicycle Hub and Park.....	3-24
3-9a	Project Site Connectivity Map .....	3-24
3-9b	Local Connectivity Map .....	3-24
3-9c	Regional Connectivity Map .....	3-24
3-10a	Proposed Open Space and Park Areas .....	3-24
3-10b	Proposed Public Park Development Plan .....	3-24
3-11	Social Loop Trail .....	3-24
3-12a	Project Internal Street Layout and Connections to Off-Site Roads .....	3-24
3-12b	Typical Existing and Proposed Carmel Mountain Road Street Section .....	3-24
3-12c	Carmel Mountain Road Frontage and Off-Site Conceptual Improvements.....	3-24
3-12d	Carmel Mountain Road Details .....	3-24
3-12e	Peñasquitos Drive – Janal Way Roundabout Improvements .....	3-24

## LIST OF FIGURES (cont.)

<b><u>No.</u></b>	<b><u>Title</u></b>	<b><u>Follows Page</u></b>
3-12f	Peñasquitos Drive/Janal Way Roundabout Section.....	3-24
3-12g	Peñasquitos Drive – Cuca Street Intersection Improvements .....	3-24
3-13	Andorra Way Emergency Access Road .....	3-24
3-14	Landscape Concept .....	3-24
3-15	Public Easement Dedications and Vacations .....	3-24
3-16	Preliminary Grading Plan.....	3-24
3-17	Conceptual SDG&E Gas Mains Locations/Relocations .....	3-24
5.1-1	Airport Land Use Compatibility Zone – MCAS Miramar .....	5.1-56
5.1-2a	Existing and Proposed RPCP Land Use Map .....	5.1-56
5.1-2b	Existing and Proposed RPCP Glens Land Uses .....	5.1-56
5.1-3	Existing and Proposed CPIOZ Areas.....	5.1-56
5.1-4	Exterior Use Area Noise Barrier Requirements .....	5.1-56
5.1-5	Residences Requiring Interior Use Area Noise Attenuation .....	5.1-56
5.2-1	Existing Traffic Volumes.....	5.2-30
5.2-2a	Project Daily Trip Distribution .....	5.2-30
5.2-2b	Project Peak Hour Trip Distribution .....	5.2-30
5.2-3	Existing Plus Project Traffic Volumes .....	5.2-30
5.2-4	Near-Term Plus Project Traffic Volumes.....	5.2-30
5.2-5	Horizon Year with Project Traffic Volumes.....	5.2-30
5.3-1	Photographs of Typical Project Conditions .....	5.3-36
5.3-2	Typical Public Views to the Project Site.....	5.3-36
5.3-2a	Site Photos at Janal Way/Yukon Street and from Rancho Carmel Drive .....	5.3-36
5.3-2b	Site Photos from Cuca Street .....	5.3-36
5.3-2c	Site Photos from I-15 NB .....	5.3-36
5.3-2d	Site Photos from I-15 SB .....	5.3-36
5.3-2e	Site Photo from Black Mountain Open Space Park.....	5.3-36
5.3-3	Project Vicinity Photos of Del Diablo Street and Caminito Orense Este.....	5.3-36
5.3-4a-d	Photo-simulations Toward the Project from Carmel Mountain Road and I-15.....	5.3-36
5.3-5a	Landscape Plan Sheet Summary .....	5.3-36
5.3-5b	Concept Plant Schedule .....	5.3-36
5.3-5c-n	Landscape Plan .....	5.3-36
5.3-6	Project Proposed Retaining Walls.....	5.3-36
5.3-7	Typical Walls and Fences .....	5.3-36
5.3-8a-c	Cross Section .....	5.3-36
5.4-1	Noise Measurement Locations .....	5.4-12
5.4-2	2050 I-15 Traffic Noise Levels – Existing Site.....	5.4-12
5.8-1	Vegetation and Jurisdictional Resources .....	5.8-18
5.8-2	Vegetation and Jurisdictional Resources Impacts .....	5.8-18
5.9-1	Project Location within Local Hydrologic Designations.....	5.9-22

## LIST OF FIGURES (cont.)

<b><u>No.</u></b>	<b><u>Title</u></b>	<b><u>Follows Page</u></b>
5.10-1	Geologic Map.....	5.10-18
5.10-2	Regional Fault Map .....	5.10-18
5.12-1	Proposed Domestic Water System.....	5.12-18
5.12-2	Proposed Sewer System .....	5.12-18
5.13-1	Public Services and Facilities .....	5.13-12
6-1	Cumulative Projects.....	6-18

## LIST OF TABLES

<b><u>No.</u></b>	<b><u>Title</u></b>	<b><u>Page</u></b>
S-1	Summary of Significant Impacts and Mitigation.....	S-12
S-2	Comparison of Project and Alternative Impacts.....	S-25
3-1	Proposed Parks and Open Space .....	3-9
3-2	Discretionary Actions Required .....	3-21
3-3	Proposed Deviations .....	3-22
5.1-1	City of San Diego Land Use Noise Compatibility Guidelines.....	5.1-27
5.1-2	Proposed Deviations .....	5.1-46
5.2-1	Existing Study Area Intersection Descriptions and Operations.....	5.2-3
5.2-2	Existing Study Area Roadway Segment Descriptions and Operations .....	5.2-4
5.2-3	Traffic Impact Significance Thresholds .....	5.2-8
5.2-4	Project Trip Generation.....	5.2-11
5.2-5	Existing Plus Project Intersection Operations.....	5.2-13
5.2-6	Existing Plus Project Street Segment Operations.....	5.2-15
5.2-7	Near-Term Intersection Operations .....	5.2-16
5.2-8	Near-Term Street Segment Operations .....	5.2-18
5.2-9	Horizon Year Intersection Operations .....	5.2-19
5.2-10	Horizon Year Street Segment Operations .....	5.2-22
5.2-11	Construction Trip Generation Estimate .....	5.2-23
5.2-12	Near-Term Intersection Operations with Mitigation.....	5.2-25
5.2-13	Horizon Year Intersection Operations with Mitigation .....	5.2-26
5.3-1	Comparison of Existing and Proposed Bulk and Scale Development Regulations for the Junipers Residential Units .....	5.3-10
5.4-1	Short-Term Noise Measurement Results .....	5.4-2
5.4-2	Property Line Noise Limits.....	5.4-3
5.4-3	Off-Site Traffic Noise Levels.....	5.4-9
5.5-1	Ambient Air Quality Standards .....	5.5-4
5.5-2	Federal and State Air Quality Designation for the San Diego Air Basin .....	5.5-7
5.5-3	Air Quality Monitoring Data.....	5.5-9
5.5-4	Screening-Level Thresholds for Air Quality Impact Analysis.....	5.5-13



## LIST OF TABLES (cont.)

<b><u>No.</u></b>	<b><u>Title</u></b>	<b><u>Page</u></b>
5.5-5	Maximum Daily Construction Emissions.....	5.5-14
5.5-6	Maximum Daily Operational Emissions.....	5.5-15
5.6-1	City General Plan Implementation Strategies.....	5.6-8
5.6-2	Construction Equipment Assumptions.....	5.6-14
5.6-3	Anticipated Construction Schedule.....	5.6-14
5.6-4	Estimated Construction Emissions for the Project.....	5.6-15
5.6-5	Photovoltaic Panel System Sizing by Plan.....	5.6-17
5.6-6	Estimated Annual Project Greenhouse Gas Emissions.....	5.6-18
5.6-7	Estimated Annual Greenhouse Gas Emissions–Development per Existing Zoning.....	5.6-20
5.6-8	Estimated Annual Greenhouse Gas Emissions–Development per Existing Land Use Designation.....	5.6-21
5.6-9	CAP Measure Consistency.....	5.6-22
5.7-1	Total Energy Consumption from Construction Equipment and Vehicles.....	5.7-15
5.7-2	Projected Annual Energy Consumption at Buildout (Operational).....	5.7-16
5.7-3	Project Fuel Economy and Energy Consumption Rates for Autos and Trucks.....	5.7-18
5.8-1	Existing Vegetation Communities/Land Use Types.....	5.8-1
5.8-2	Waters of the U.S./State.....	5.8-4
5.8-3	CDFW Streambed Habitat.....	5.8-4
5.8-4	Jurisdictional Impacts and Mitigation.....	5.8-14
5.9-1	Summary of Typical Pollutant Sources for Urban Storm Water Runoff.....	5.9-4
5.9-2	Typical Loadings for Selected Pollutants in Runoff from Various Land Uses.....	5.9-4
5.10-1	Summary of Regional Fault Locations and Earthquake Magnitudes.....	5.10-5
5.13-1	Call Priority Response Times.....	5.13-2
5.13-2	SDFRD Emergency Response Times.....	5.13-9
6-1	Cumulative Projects.....	6-1
6-2	Cumulative Project Generated Traffic Noise Levels.....	6-7
8-1	Comparison of Project and Alternative Impacts.....	8-26

## LIST OF ACRONYMS AND ABBREVIATIONS

$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
AARP	American Association of Retired Persons
AB	Assembly Bill
ACM	Asbestos-containing materials
ADA	Americans with Disabilities Act
ADD	Assistant Deputy Director
ADRP	Archaeological Data Recovery Program
ADT	average daily traffic
AFG	Accelerated Forecasted Growth
Afu	undocumented fill
AFY	acre-feet per year
AGR	Agricultural supply
AIA	Airport Influence Area
AICUZ	Air Installation Compatible Use Zone
ALUC	Airport Land Use Commission
ALUCOZ	Airport Land Use Compatibility Overlay Zone
ALUCP	Airport Land Use Compatibility Plan
AME	Archaeological Monitoring Exhibit
AMSL	above mean sea level
APCD	Air Pollution Control District
APZ	Accident Potential Zone
AQTR	Air Quality Technical Report
ARRA	American Recovery and Reinvestment Act of 2009
ASCE	American Society of Civil Engineers
AST	Aboveground storage tank
ASTM	American Society for Testing and Materials
ATS	advanced treatment systems
Basin Plan	Water Quality Control Plan for the San Diego Basin
BAT	best available technology economically achievable
BCT	best conventional pollutant control technology
BI	Building Inspector
BIOL	Preservation of biological habitats of special significance
BMP	best management practice
BP	Before Present
BRT	Bus Rapid Transit
BTU	British thermal units
C&D	construction and demolition
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model

CALGreen	California Green Building Standards Code
CalOHSA	California Occupational Health and Safety Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CARB EMFAC	California Air Resources Board Emission FACTors
CASQA	California Stormwater Quality Association
CBC	California Building Code
CBSC	California Building Standards Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDC	California Department of Conservation
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CED	California Energy Demand
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CESA	California Endangered Species Act
CFG	California Fish and Game
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH <sub>4</sub>	methane
CHMIRS	California Hazardous Materials Information Reporting System
City	City of San Diego
CM	Construction Manager
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
COLD	cold freshwater habitat
Corps	U.S. Army Corps of Engineers
CPA	Community Plan Amendment
CPIOZ	Community Plan Implementation Overlay Zone
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRHR	California Register of Historical Resources
CSMP	Construction Site Monitoring Program
CSV	Consultant Site Visit Record
CWA	Clean Water Act
cy	cubic yard

DA	Developable Area
dB	decibel
dba	A-weighted decibel
DC	direct current
DCV	design capture volume
DEH	Department of Environmental Health
DMA	Drainage Management Area
DOD	U.S. Department of Defense
DPM	diesel particulate matter
DSD	Development Services Department
DU/AC	dwelling units per acre
DWR	California Department of Water Resources
EAS	Environmental Analysis Section
EB	eastbound
ECHO	Enforcement and Compliance History Online
EIR	Environmental Impact Report
EMS	emergency medical services
EMT	emergency medical technician
EO	Executive Order
EPIC	Energy and Policy Initiatives Center
ESA	Environmental Site Assessment
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
EST	estuarine habitat
EV	electric vehicle
F	Fahrenheit
FAA	Federal Aviation Administration
FAR	floor area ratio
FBA	Facilities Benefit Assessment
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System
FIRM	Flood Insurance Rate Map
FPP	Fire Protection Plan
FRA	Federal Responsibility Area
FTA	Federal Transit Administration
FY	fiscal year
GDP	General Development Plan
GHG	greenhouse gas
GPA	General Plan Amendment
gpd	gallons per day
gpd/ac	gallons per day per acre
GWh	gigawatt hour
GWP	global warming potential

H <sub>2</sub> S	hydrogen sulfide
HA	hydrologic area
HAP	hazardous air pollutant
HAZWOPER	Hazardous Waste Operations and Emergency Response
HELIX	HELIX Environmental Planning, Inc.
HFCs	hydrofluorocarbons
HMMD	Hazardous Materials Management Division
HMP	Hydromodification Management Plan
HOA	Home Owners Association
HPWQP	High Priority Water Quality Problems
HRA	health risk assessment
HRG	Historical Resource Guidelines
HU	hydrologic unit
HVAC	heating, ventilation, and air conditioning
Hz	hertz
I-	Interstate
IBC	International Building Code
IEM	Iowa Environmental Mesonet
IID	Imperial Irrigation District
IND	industrial service supply
IPCC	United Nations Intergovernmental Panel on Climate Change
ISA	IS Architecture
IWMP	Integrated Waste Management Plan
Jsp	Santiago Peak Volcanics
kHz	kilohertz
km	kilometer
kWh	kilowatt hours
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
L <sub>EQ</sub>	one-hour average sound level
LID	low impact development
LLG	Linscott, Law & Greenspan Engineers
LOS	level of service
LRA	Local Responsibility Area
LTPP	Long Term Procurement Plan
MAR	marine habitat
MAWA	Maximum Applied Water Allowance
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MEI	maximally exposed individual
MEP	maximum extent practicable

MFR	multi-family residential
mg/m <sup>3</sup>	milligrams per cubic meter
mgd	million gallons per day
MHMA	Multi-jurisdictional Hazard Mitigation Plan
MHPA	Multi-habitat Planning Area
MIGR	migration of aquatic organism
MLD	Most Likely Descendent
MLS	Mass Loading Station
MMC	Mitigation Monitoring Coordination
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MMth	million therms
mpg	miles per gallon
mph	miles per hour
MPOs	Metropolitan Planning Organizations
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer Systems
MSCP	Multiple Species Conservation Program
MSSC	Minor Street Stop-Controlled
MT	metric ton
MTS	Metropolitan Transit System
MUN	municipal and domestic supply
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWEL	Model Water Efficient Landscape Ordinance
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NB	northbound
NDP	Neighborhood Development Permit
NFPA	National Fire Protection Agency
NHTSA	United States Department of Transportation's National Highway Traffic Safety Administration
NO	nitric oxide
NO <sub>2</sub>	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NSLU	noise-sensitive land use
NTP	Notice to Proceed
O <sub>3</sub>	ozone
OES	Office of Emergency Services
OHWM	ordinary high water mark
OSB	oriented strand board



OSHA	Occupational Safety and Health Administration
PAR	Property Analysis Record
Pb	lead
PCB	Polychlorinated biphenyl
PCE	passenger car equivalent
PCE	Perchloroethylene
PDP	Planned Development Permit
PFCs	perfluorocarbons
PPFP	Public Facilities Financing Plan
PG&E	Pacific Gas & Electric
PGA	peak ground acceleration
PI	Principal Investigator
PLWTP	Point Loma Wastewater Treatment Plant
PM	particulate matter
PM <sub>10</sub>	respirable particulate matter
PM <sub>2.5</sub>	fine particulate matter
PME	Paleontological Monitoring Exhibit
POC	Point of Compliance
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
PRD	Planned Residential Development
precon	preconstruction
Province	Peninsular Ranges Geomorphic Province
PRP	Paleontological Recovery Program
PUD	Public Utilities Department
Qal	alluvium
Qudf <sub>1&amp;2</sub>	Undocumented fill
RAQS	Regional Air Quality Strategy
RARE	rare, threatened or endangered species
RCP	reinforced concrete pipe
RCRA	Resource Conservation and Recovery Act
RE	Resident Engineer
REAP	Rain Event Action Plan
REC	Recognized Environmental Condition
REC 1	contact water recreation
REC 2	non-contact water recreation
RES	Regional Energy Strategy
RF	radio frequency
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gas
ROW	right-of-way
RPCP	Rancho Peñasquitos Community Plan
RPCPG	Rancho Peñasquitos Community Planning Group

RPPB	Rancho Peñasquitos Planning Board
RPS	renewable portfolio standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SAM	Site Assessment and Mitigation
SANDAG	San Diego Association of Governments
SB	Senate Bill
SB	southbound
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearinghouse
SCIC	South Coast Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFRD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDHC	San Diego Housing Commission
SDMC	San Diego Municipal Code
SDNHM	San Diego Natural History Museum
SDP	Site Development Permit
SDPD	San Diego Police Department
SDREO	San Diego Regional Energy Office
SDUSD	San Diego Unified School District
SF	square foot / feet
SF <sub>6</sub>	sulfur hexafluoride
SFP	School Facilities Program
SFR	Single-family residential
SHELL	shellfish harvesting
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigations, and Cleanups
SO <sub>2</sub>	sulfur dioxide
SPL	sound pressure level
SPWN	spawning, reproduction and/or early development
SR	State Route
SRA	State Responsibility Area
SRRE	Source Reduction and Recycling Element
STC	Sound Transmission Class
STP	shovel test pit
SWAT	Special Weapons and Tactics
SWEEPS	Statewide Environmental Evaluation and Planning System
SWIS	Solid Waste Information System
SWP	State Water Project

SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
TDM	transportation demand management
TDS	total dissolved solids
TIA	Transportation Impact Analysis
TMDL	total maximum daily load
Tmv	Mission Valley Formation
TNM	Traffic Noise Model
TPA	Transit Priority Area
TSCA	Toxic Substances Control Act
TSS	total suspended solids
TWLTL	two-way left-turn lane
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground storage tank
UWMP	Urban Water Management Plan
V/C	volume to capacity ratio
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
VTM	vesting tentative map
WARM	warm freshwater habitat
WDM	waste diversion measure
WDR	Waste Discharge Requirements
WILD	wildlife habitat
WLA	waste load allocation
WMA	Watershed Management Area
WMP	Waste Management Plan
WQBEL	water quality based effluent limitation
WRCC	Western Regional Climate Center
<del>WS</del>	<del>waters of the State</del>
WSA	Water Supply Assessment
WUCOLS	Water Use Classification of Landscape Species
<del>WUS</del>	<del>waters of the U.S.</del>

This page intentionally left blank

## **S.0 SUMMARY**

### **S.1 Project Synopsis**

This summary provides a brief synopsis of the ~~Draft-Final~~ Environmental Impact Report (EIR) for The Junipers Project (project), prepared in compliance with the California Environmental Quality Act (CEQA), and includes: (1) a description of the project and its components; (2) the results of the environmental analysis contained within this EIR; (3) the major areas of controversy and issues to be resolved by the decision-makers; and (4) the alternatives to the project that were considered. This summary does not contain the extensive background and analysis found in the EIR. Therefore, the reader should review the entire EIR to fully understand the project and its related environmental consequences.

As the CEQA Lead Agency, the City of San Diego (City) has the primary responsibility for evaluating the environmental effects of the project and is considering approval or disapproval of the project in light of these effects. As required by CEQA, this EIR: (1) describes the project, including its location, objectives, and features; (2) describes the existing conditions at the project site and surrounding areas; (3) analyzes the direct, indirect, and cumulative adverse physical effects that would occur to the existing conditions if the project is implemented; (4) identifies feasible means of avoiding or substantially lessening the significant adverse effects, if available; (5) provides a determination of significance for each impact after mitigation is incorporated; and (6) evaluates a reasonable range of feasible alternatives to the project that would attain most of the basic project objectives and avoid or substantially lessen a significant project-related impact.

#### **S.1.1 Project Location and Setting**

The project would entail the redevelopment of a 112.3-acre site currently encompassing an inactive golf course and five tennis courts with a cohesive, age-qualified community including up to 455 for-sale residential units and 81 for-rent affordable housing units (536 total units), a public park, a private park and social loop trail with public recreation easements, and other private parks and usable open space. The site is located within the northeast portion of the City's Rancho Peñasquitos Community Plan (RPCP) area, which lies 17 miles north of downtown San Diego and 8 miles south of the City of Escondido.

The project site is immediately west of Interstate 15 (I-15), north of Carmel Mountain Road, and east of Peñasquitos Drive. Primary access would be provided at the intersection of Peñasquitos Drive and Janal Way and a secondary right-in only access would be provided from Carmel Mountain Road.

Surrounding land uses include single- and multi-family residential to the west and north, and a hotel (Hotel Karlan) to the south. Residential uses are primarily low-density single-family detached to the north and west, with multi-family residences to the northwest and southwest. To the east across I-15 are commercial shopping centers and office buildings. Farther to the west is the Black Mountain Open Space Park. The runway for Marine Corps Air Station (MCAS) Miramar is situated approximately 7 miles south of the project site along Miramar Road.

The Carmel Highland Golf Course was constructed in the 1960s and began operations in 1967 as the Rancho Peñasquitos Golf Course. A prior owner purchased the subject golf course/hotel property in 2011 and made a number of improvements to the golf course, but decided to close it in 2015, citing reduced golf course usage/revenues and higher water costs as the reasons for the closure. The current project applicant, Carmel Highlands LLC, purchased the property in 2016. There is currently no active land use on the site, although the owner actively maintains the on-site vegetation for fire/brush management purposes to reduce fire risk.

Topography on the site ranges from approximately 750 feet above mean sea level (AMSL) at the extreme northern corner of the project site to approximately 620 feet AMSL at the central eastern portion of the project site. The site is mapped primarily as ornamental, developed, or disturbed vegetation communities. The site drains into an existing man-made ditch which extends along the northeastern and eastern portions of the project site. The channel is earthen-bottomed for its northern extent, but transitions to being concrete-lined before connecting to an off-site storm drain system that continues under Interstate 15. All flows are ultimately conveyed into Peñasquitos Creek.

## S.1.2 Project Objectives

The primary goals and objectives of the project are to:

1. Address the City's housing supply needs by providing an expanded residential footprint which includes both for-sale market rate and for rent affordable age-qualified (55+) residences.
2. Provide a diversity of housing opportunities and include 15 percent affordable housing rental units on site.
3. Provide compact infill residential uses in proximity to existing neighborhood commercial to support a walkable neighborhood with access to services;
4. Construct and maintain a multimodal circulation system for vehicles, bicycles, and pedestrians to enhance accessibility and support active transportation and public transit use;
5. Provide a new public community-accessible park and provide public access to certain on-site private parks and trails to create a connected trail system for additional public recreational opportunities and to promote general community-wide health and wellness;
6. Reconstruct the on-site drainage as a natural drainage feature with native and wetland species, resulting in a gain in native habitat;
7. Provide solar panels on 100 percent of the project's for-sale and affordable housing structures;
8. Improve emergency access and enhance egress routes on and off site; and



9. Provide electric vehicle (EV) charging stations and a centralized mobility area to support multi-modal transportation options, ride-sharing, and informational kiosks to support walking, cycling and transit use.

### S.1.3 Project Description

The project would entail the redevelopment of a 112.3-acre site with up to 455 for-sale, age-restricted (55+) residential units and 81 for-rent, affordable, age-restricted housing units (536 units total), a public park, a private park and social loop trail with public recreation easements, and other private parks and usable open space. The proposed vesting tentative map (VTM) and Planned Development Permit (PDP) would subdivide the site into a total of 13 lots: 5 residential lots (including 4 for-sale lots and 1 for-rent affordable lot), 7 park and open space lots, and 1 lot designated for private driveways. The project would also require a community plan amendment (CPA) and rezoning from the existing RS-1-14 zone to RM-1-1 and RM-3-7 residential zones and OR-1-1 and OP-1-1 open space zones. A Community Plan Implementation Overlay Zone (CPIOZ) is proposed for the project site, to limit future development to no more than 536 units, unless a new PDP is processed. In addition, rescission of existing CUP 87-0346 that covered the prior golf course use is required.

Primary vehicular access to the project, as well as fire and emergency access, would be from a new driveway, connecting to Janal Way at the intersection of Janal Way with Peñasquitos Drive, to form a new four-way intersection designed as a traffic-calming roundabout. Additionally, a traffic signal is proposed by the project at the intersection of Peñasquitos Drive/Cuca Street/Hotel Karlan driveway. These two intersection designs have been incorporated into the project design to mitigate the traffic impacts of the project. A right-turn-in only access to the site from Carmel Mountain Road is also proposed. Internal connections within the project site would be provided with privately maintained driveways and pathways.

Off-site emergency access/egress between Andorra Way and Corte Raposo would be improved by the project to remove inoperable bollards, install an automatic gate to SDFRD requirements, resurface the connection to carry the imposed load of fire apparatus (75,000 pounds), and provide ongoing vegetation maintenance and gate maintenance funding, providing a usable emergency link between the two streets. All new structures would be constructed to ignition-resistant standards that exceed the SDFRD Fire Code requirements, as specified in the project's Fire Protection Plan (FPP).

The project's for-sale residential housing unit types include 133 50x90 single detached units, 136 duplex units, and 186 six-plex units for a total of 455 for-sale residential units.

All single detached units would be one to two stories high, with floor plans ranging from 1,738 to 2,527 square feet (SF), including three or four bedrooms and two to three bathrooms. While the proposed zoning would allow for a 30-foot structure height, the maximum height for the single-story units is planned to be 21 feet 6 inches, and the maximum height for the two-story units is planned to be 28 feet 7 inches.

Duplex units would range from 1,946 to 2,106 SF, with 3 bedrooms and 2 or 2.5 bathrooms each. These structures would all incorporate two-story elements. The maximum allowable height is 30 feet. The proposed maximum height is 27 feet 10 inches.

The six-plexes would range from 1,199 to 2,240 SF, with 2 to 4 bedrooms and 2 to 3 bathrooms each. Six-plex one-story units would have a maximum height of 20 feet, 11 inches and two-story units would reach a maximum of 26 feet, 9 inches high.

For-rent, affordable housing units account for 15 percent of the total proposed units on the site at 81 units. The units would be one- and two-bedroom apartment homes. The structure is anticipated to be three stories ranging up to just under 40 feet in height (39 feet, 11 inches). The RM-3-7 zone would allow building heights of up to 40 feet. Incorporation of these income-restricted units would exceed the project's affordable housing obligation, consistent with the City's inclusionary housing policies as required in the San Diego Municipal Code (SDMC) Chapter 14, Article 2, Division 13, the Inclusionary Housing Ordinance. Additionally, a variance is being requested from the Inclusionary Affordable Housing Regulations to address comparable bedroom mix requirement between affordable and market rate units.

Four primary architectural variations have been designed for the project and would be interspersed within the development: Adaptive Modern, Mohnike Barn, Elevated Ranch/Adobe Ranch, and Rustic Minimalist. Landscaping is proposed throughout the project site, including along all setbacks, within the entries, courtyards, surface parking areas, and along the pedestrian walkways. The landscape plan would include the use of drought-tolerant, ornamental, native, and naturalized plants.

The project would construct a public park, which the public can access via Janal Way. This public park would provide approximately 2.87 net usable acres of parkland. The land set aside for public park would be dedicated to and maintained by the City. The public park includes a dog run area, children's play areas, picnic and game areas, bike racks, and a large turf area.

In addition to the proposed public park, the project includes a Homeowners Association (HOA)-owned and maintained 0.52-acre private park and 2.75-mile social loop trail that would have public access easements. With the easements in place, members of the public and the larger Glens community would be permitted to access these facilities. The park would incorporate sport courts and a mobility zone and bicycle hub. These uses would promote bicycling, walking, transit, and carpooling. The mobility zone is proposed to include a drop-off/pickup area for rideshare, carpool and similar purposes; signage regarding transit options and schedule; and shaded seating areas. The bicycle hub is proposed to include bicycle racks (14 spaces), pneumatic air pressure facilities, bike stands with tethered repair tools, outdoor day use lockers and two bike vending kiosks, a staging area for shared scooters and ebikes with posted user information, and posted information regarding local and regional streets and trails showing bike routes.

Various private parks throughout the project would be posted for use by for sale or rental residents only and maintained by the HOA through resident dues and assessments. They comprise recreational/open space elements beyond the public park allocation described above. These private parks total 4.6 acres of usable space with a pool, pickleball courts, gathering areas, outdoor cooking facilities, gardens/greenhouses and orchards, walking areas, fire pits, an outdoor classroom, a community library, game tables, and the like.

There is an existing man-made ditch traversing the site, portions of which are concrete-lined. This feature does not currently support wetland vegetation and is proposed to be removed and re-established, to ultimately serve as a drainage feature, wildlife habitat, and a visual/open space feature.

Approximately 12,250 feet of retaining walls are proposed around the site perimeter, with heights of up to 12 feet, to support project slopes and protect certain utilities in place, including an SDG&E north-to-south gas transmission line and existing underground AT&T distribution line. Other existing utilities on site would be vacated or retained and realigned to occur within project streets. Approximately 820,000 cubic yards of cut and fill are anticipated during project grading, and no import or export of graded material is anticipated.

## **S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects**

Table S-1, *Summary of Significant Impacts and Mitigation*, located at the end of this section, summarizes the results of the environmental analysis completed for the project. Table S-1 identifies the significant impacts associated with the project, includes mitigation measures to reduce and/or avoid significant environmental effects, and concludes if the impact would be mitigated to a level below significance with implementation of mitigation measures. The mitigation measures listed in Table S-1 are also discussed within each relevant topic area, and fully contained in Section 9.0, *Mitigation, Monitoring, and Reporting Program* (MMRP).

## **S.3 Areas of Controversy**

The project's Notice of Preparation (NOP) was distributed on April 10, 2018 for a 30-day public review and comment period, and a public scoping meeting was held on April 18, 2018. Responses and comments were received on the NOP that reflect controversy related to several environmental issues. The NOP, response letters from public agencies and organizations, public scoping meeting sign-in sheet, public comments received at the scoping meeting, and public scoping meeting transcript, are included in this EIR as Appendix A.

A total of five letters were received during the NOP period, including three letters from state agencies (California Department of Fish and Wildlife [CDFW], California Department of Transportation [Caltrans], and the State Clearinghouse [SCH]), one letter from a Tribe (Rincon Band of Luiseño Indians), and one letter from a special interest group (San Diego County Archaeological Society). In addition, a number of comment forms were received at the public scoping meeting or via mail from members of the public. Four people spoke at the public scoping meeting.

Issues of controversy raised in response to the NOP include concerns related to traffic (congestion of local streets and highways, safe access to and from site), multimodal transportation, public health and safety, fire and emergency evacuation, public services (schools, police protection, fire protection), wildlife migration and biological resources, water supply and conservation, aesthetics (views, visual impacts, community character), cumulative impacts, utilities and their associated easements, parks and recreation (trail usage), open space, parking, lighting, land use (affordable housing, community integration, community plan consistency), grading and construction, hazardous waste, geotechnical and soil impacts, energy conservation, and growth inducement.

## S.4 Issues to be Resolved by the Decision-Making Body

The City Council must review the project and this EIR and determine if the project or one of the alternatives presented in Section 8.0 should be adopted and implemented. If the project is selected for adoption, the City Council will be required to certify the Final EIR, determine whether and how to mitigate significant impacts, and adopt associated Findings pursuant to CEQA Guidelines Section 15091 for the following significant impacts identified in the EIR:

- Transportation and Circulation
- Biological Resources
- Historic and Tribal Resources
- Public Health and Safety

Mitigation has been provided to reduce all impacts of the project to a less than significant level.

## S.5 Project Alternatives

Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location, which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

In addition to the project, the EIR addresses in detail the following three alternatives per the above-noted CEQA requirements: the No Project/No Development Alternative; the No Project/Development Per the Community Plan Alternative (assumed to be redevelopment with a golf course use); and the Reduced Intensity Development Alternative (assumed to include 25 percent fewer residential units). These alternatives are summarized below, and evaluated in full in Section 8.0, *Alternatives*, of this document. A summary comparison of the impacts associated with the project alternatives is included in Table S-2, *Comparison of Project and Alternative Impacts*. This table follows Table S-1 at the end of this section.

### S.5.1 No Project/No Development Alternative

Under the No Project/No Development Alternative, the project site would remain in its current condition, including remnants of ornamental vegetation, sand traps, fencing, retaining walls, and poles with deteriorating netting, all related to the former Carmel Highland Golf Course. The former fairways and grass areas would continue to be unirrigated and annual mowing of the site for fire-~~related~~ brush management/vegetation maintenance purposes would likely continue. The No Project/No Development Alternative would avoid significant but mitigable impacts to transportation/circulation, biological resources, historical and tribal cultural resources, and health and safety that were identified for the project. It would also avoid impacts to visual effects/neighborhood character, air quality, GHG emissions, energy, hydrology and water quality,

geology, public utilities, and public services and facilities/recreation, which would be less than significant for the project and would not require conditions of approval relative to design features to address land use compatibility. The proposed GPA and CPA would not be required for this alternative.

Under the No Project/No Development Alternative, the opportunity to convert the site from its current unusable condition as a deteriorating former golf course, to much-needed age-restricted (55+) affordable and market rate housing, would be lost. Certain proposed improvements associated with the project that would benefit the community also would not be realized with this alternative. These include the provision of a public park, publicly accessible private park (with mobility-enhancing features and sports courts) and social loop trail, provision of pedestrian and bicycle linkages through the project site to the commercial areas and transit stops at Carmel Mountain Road, the elimination of potentially flammable brush on site, and provision of an additional emergency egress route through the project site in the event of a fire in the Black Mountain Open Space Park or other areas to the west, and improved intersection level of service due to implementation of a traffic signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and a roundabout at Peñasquitos Drive/Janal Way/Future Project Access, compared to the “without project” condition. In addition, the project would reestablish and improve the existing non-wetland jurisdictional ditch (including addition of wetland plant species), and during grading the project would be required to remove any hazardous materials and contaminated soils that may be present on the project site. And finally, some viewers of the project site may prefer views of the proposed development to the existing views of an abandoned golf course.

Based on the preceding analysis and the fact that no development of any of the project features would occur with the No Project/No Development Alternative, this alternative would fail to meet any of the basic project objectives listed above.

## **S.5.2 No Project/Development Per Community Plan Alternative**

Under the No Project/Development Per Community Plan Alternative, the project site would be redeveloped with a golf course as identified in the RPCP. This alternative assumes that the existing vegetation and structures would be removed, the site would involve substantial shallow grading/reconfiguration, and new buildings (e.g., a clubhouse, pro shop, and maintenance buildings, etc.), landscaping, irrigation, roadways/parking facilities, and utilities connections would be required to complete the reconfigured golf course.

This alternative would have the potential to preserve the existing jurisdictional drainage ditch on the project site, although preservation in place may not be feasible during grading to reconfigure the golf course, and must be weighed against the benefits of reestablishing the drainage as a higher quality jurisdictional feature with wetland vegetation. As explained in Section 8.4.2, the significant but mitigable impacts of the project with respect to transportation, historical resources and health/safety would remain significant but mitigable with this alternative and would have the same mitigation requirements, although the transportation and historical resources impacts would be slightly reduced compared to the project.

Both the project and this alternative would result in less than significant impacts with respect to land use, noise, air quality, GHG, energy, visual effects/neighborhood character, hydrology/water quality,

public utilities, geology, and public services and facilities/recreation, although the impacts would also be expected to be similar or slightly less than those associated with the project, as the golf course would require less grading/construction and would represent a less intensive use of the project site. The No Project/Development Per Community Plan Alternative would have slightly higher energy use and air quality and GHG emissions than the project because of the extensive sustainability features that have been incorporated into the project.

The No Project/Development Per Community Plan Alternative would not provide a diversity of housing opportunities, including age-qualified homes and 15 percent affordable housing rental units, nor would it provide residential uses in proximity to existing neighborhood commercial to support a walkable neighborhood (Objectives 1 through 3). It also would not increase mobility options by providing improved pedestrian and bicycle linkages between the center and the adjacent neighborhood (Objective 4). If the golf course would be public, then this alternative would provide a public open space (Objective 5). This alternative would either avoid or mitigate impacts to the existing on-site drainage, providing for the creation and/or preservation of on- and/or off-site higher quality wetland habitat using native and wetland species (Objective 6). It would not provide substantial solar energy opportunities but would have a similar GHG emissions profile to that of the project (Objective 7). The alternative would not provide alternative and additional emergency access across the site and off site for existing residents to the west (Objective 8), nor would it provide publicly accessible mobility features to encourage alternative modes of transportation (Objective 9). Overall, the No Project/Development Per Community Plan Alternative would potentially be able to meet some, but not all, of the basic project objectives listed above in Section S.81.2.

Certain other benefits of the project also would not be realized under the No Project/Development Per Community Plan Alternative. The opportunity to provide much-needed affordable and market rate, age-restricted (55+) housing, during a well-documented shortage of these housing types in the region, would be lost. Certain proposed improvements associated with the project that would benefit the community also would not be realized with this alternative. These include the provision of a public park, publicly accessible private park (with mobility enhancing features and sports courts), and social loop trail; provision of pedestrian and bicycle linkages through the project site to the commercial areas and transit stops at Carmel Mountain Road; and the provision of improved/additional emergency egress routes.

It is important to note that implementation of this alternative would require that a project applicant would be interested in developing a golf course on the site, or that the City propose to develop it as a public golf course. The site was previously developed with a golf course that closed, citing maintenance costs including the cost of water as the reason for the golf course closure. If a private, for-profit golf course proves not to be financially feasible then a public golf course would be the only option, implementing the golf course as a public recreational amenity.

### **S.5.3 Reduced Intensity Development Alternative**

The Reduced Intensity Development Alternative would involve a similar development proposal to the project, but with a 25 percent reduction in the number of residential units. There were no feasible residential development alternatives identified that could eliminate any of the impacts associated with the project. Development necessarily involves removal of the on-site poorly compacted fill material and impacts to the non-wetland, jurisdictional drainage on site. The traffic



signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and roundabout at Peñasquitos Drive/Janal Way/Future Project Access is triggered at just 10 percent and 5 percent of the proposed units, respectively, which would not comprise a feasible development for the project applicant. Therefore, a 25 percent reduction in the number of units on site was selected as an alternative that would noticeably reduce project impacts, while still representing a feasible development. Specifically, this alternative considers the development of 402 age-restricted homes, including 341 market rate and 61 affordable age-restricted residences. The mobility improvements and community facilities, as well as sustainable design features, proposed as part of the project also would occur under this alternative, but at a similarly reduced rate, and this alternative is anticipated to involve slightly larger market rate homes.

The Reduced Intensity Development Alternative would not avoid any significant but mitigable impacts associated with the project. This alternative would generate less traffic and contribute fewer trips to the intersections in the project area, but the required mitigation would be the same, because the proposed mitigation is triggered at community plan buildout Year 2050 with just 54 dwelling units for Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and 27 dwelling units for Peñasquitos Drive/Janal Way/Project Access (LLG 2020). Significant but mitigable historical resources impacts would be slightly less than the project impacts, but the required mitigation would be the same. The project and this alternative would have essentially the same significant impacts with the same mitigation required to reduce impacts to less than significant levels, for biological resources and health/safety. Less than significant impacts associated with both the project and this alternative with respect to visual effects/neighborhood character, air quality, GHG, energy, geology, public utilities, and public services and facilities/recreation, would be slightly less for this alternative, while less than significant land use, noise and water quality/hydrology impacts would be approximately the same. The differences are primarily associated with the slightly reduced intensity of development and level of grading required for this alternative.

As the Reduced Intensity Development Alternative would involve a reduction by 25 percent of the development intensity of the project, it is likely that most of the project objectives would be met. This alternative would provide a diversity of housing opportunities, including age-restricted market-rate housing and affordable for-rent housing, and provide residential uses in proximity to existing neighborhood commercial to support a walkable neighborhood (Objectives 1 through 3), although it is likely that the market rate homes for this alternative would be slightly larger and the development would be less compact (Objective 2). This alternative would increase mobility options by providing improved pedestrian and bicycle linkages between the shopping center and the adjacent neighborhood (Objective 4) and would likely provide a public open space that would be about 25 percent smaller than the park for the project (Objective 5). This alternative would mitigate impacts to the existing non-wetland drainage on site through the creation and/or preservation of higher quality wetland habitat either on-site or off-site using native and wetland species (Objective 6), reduce GHG emissions with solar panels on housing structures (Objective 7), improve emergency access through the site and off site (Objective 8). This smaller development would provide fewer publicly accessible mobility features, to encourage alternative modes of transportation (Objective 9).

It is important to note that the project was originally proposed to be 476 residential units, as described in Section 4.0, *History of Project Changes*, of this EIR. The applicant presented the contents of the application to the Rancho Peñasquitos Planning Board (RPPB) Land Use Committee on

December 6, 2017. In the months that followed, the applicant met with City housing advocates and leaders, and considered comments made by the Mayor and City Council members about the housing shortage that the community is facing. This input, along with conversations around the vanishing housing options for fixed-income seniors, was the impetus for the revised project plan, submitted in early 2018. Due to the proximity of the project to existing transit stops and the recognized need within the City for additional senior and affordable housing, City Staff supported an increase in the total number of homes and the associated density for the project site. As a result, the total number of homes was increased to 536, including 455 age-qualified condominium housing units and 81 affordable age-qualified multi-family apartment-style homes. This increased density would not be realized with the Reduced Intensity Development Alternative.

## **S.5.4 Environmentally Superior Alternative**

Section 15126.6(e)(2) of the CEQA Guidelines requires an EIR to identify the environmentally superior alternative. The No Project Alternative has been identified as the environmentally superior alternative, based on the fact that this alternative would not result in any contribution to cumulatively significant impacts related to transportation/circulation; or to project-specific significant impacts related to traffic, biological or cultural resources, or health and safety which would occur with the project. The CEQA Guidelines also note, however, that if the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives.

Of the remaining alternatives, the environmentally superior alternative would be the No Project/ Development Per Community Plan Alternative. This alternative would reduce many of the impacts of the project, except that the significant but mitigable health/safety impacts and the less than significant energy, air quality and GHG emissions (which take into consideration the extensive sustainability features that have been incorporated into the project) would be about the same or slightly greater for this alternative compared to the project. Every other impact would be reduced with this alternative, and the General Plan noise compatibility standards would be more readily met, due to the less restrictive noise standards associated with a golf course, compared to a residential development. This alternative would not meet most of the identified project objectives, however, and certain other benefits of the project also would not be realized under this alternative. Examples include the provision of a public park and social loop trail, mobility-enhancing features within a publicly accessible private park on the site, pedestrian and bicycle linkages through the project site to the commercial areas and transit stops at Carmel Mountain Road, and an additional emergency egress route through the project site in the event of a fire in the Black Mountain Open Space Park or other areas to the west.

This alternative would fail to provide much-needed affordable and market rate, age-restricted (55+) housing in the region, and would not implement statewide, regional, and City strategies that encourage intensifying future development into developed areas that are closer to the regional transit system. Implementation of this strategy is an important component of the approach to improve regional mobility and reduce contributions to GHG emissions (and associated air pollutant emissions and energy use) because the strategy makes it possible for larger numbers of people to make fewer and shorter automobile trips. Furthermore, implementation of the No Project/ Development Per Community Plan Alternative would require that a project applicant would be

interested in developing a golf course on the site, or that the City propose to develop it as a public golf course.

The previous privately owned golf course on the site failed, citing maintenance costs including the cost of water as the reason for the golf course closure. If a private, for-profit golf course proves not to be financially feasible, then a public golf course would be the only option, implementing the golf course as a public recreational amenity.

<b>Table S-1</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>TRANSPORTATION/CIRCULATION</b>		
<b>Traffic Capacity (Streets):</b> <i>Would the project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?</i> <b>Transportation Systems:</b> <i>Would the project have a substantial impact upon existing or planned transportation systems?</i>		
Significant direct and cumulative impacts would occur at the Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway and the Peñasquitos Drive/Janal Way/Project Access intersections under the Existing Conditions Plus Project, Near-Term Plus Project, and Year 2050 Plus Project scenarios.	<b>TRA-1: Traffic Signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway Intersection</b> Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the construction of a traffic signal at Peñasquitos Drive/Cuca Street/Hotel Karlan Driveway with dedicated left-turn lanes with protected phasing on Peñasquitos Drive, and permissive phasing on the minor street (Cuca Street/Hotel Karlan Driveway) approaches, satisfactory to the City Engineer. Improvements shall be completed and operational prior to the project's first occupancy.	Less than significant
	<b>TRA-2: Roundabout at Peñasquitos Drive/Janal Way/Project Access Intersection</b> Prior to issuance of the first building permit, Owner/Permittee shall assure by permit and bond the construction of a single-lane roundabout at Peñasquitos Drive/Janal Way/project Access, satisfactory to the City Engineer. Improvements shall be completed and operational prior to the project's first occupancy.	

**Table S-1 (cont.)**  
**SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION**

Impact	Mitigation	Significance After Mitigation
<b>BIOLOGY</b>		
<p><b>Sensitive Species:</b> <i>Would the project result in a substantial adverse impact, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by CDFW or USFWS?</i></p> <p><b>Sensitive Habitats:</b> <i>Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS?</i></p> <p><b>Local Plans and Policies:</b> <i>Would the project result in a conflict with any local policies or ordinances protecting biological resources?</i></p>		
Construction of the project would result in significant impacts to the man-made drainage feature that occurs within the eastern/northeastern portion of the project site.	<p><b>BIO-1:</b> Impacts to 0.10 acre of USACE- and RWQCB-jurisdictional non-wetland waters of the U.S./State shall be mitigated at a minimum 1:1 ratio through one or a combination of the following: on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of a minimum of 0.10 acre waters of the U.S./State; and/or off-site purchase of waters of the U.S./State credits at an approved mitigation bank, such as the Brook Forest Conservation/Mitigation Bank, or other location deemed acceptable by the USACE and RWQCB. Impacts to waters of the U.S./State would require notification to the USACE for issuance of a Section 404 CWA permit and notification to the RWQCB for issuances of a Section 401 CWA permit from the RWQCB.</p> <p><b>BIO-2:</b> Impacts to <del>0.11</del><u>0.15</u> acre of CDFW-jurisdictional streambed will be mitigated at a minimum 1:1 ratio through one or a combination of the following: on- and/or off-site establishment, re-establishment, rehabilitation, and/or enhancement of a minimum of <del>0.11</del><u>0.15</u> acre riparian and/or stream habitat; and/or off-site purchase of riparian and/or stream credits at an approved mitigation bank, such as the Brook Forest Conservation/Mitigation Bank, or other location deemed acceptable by the CDFW. Impacts to CDFW-jurisdictional resources would require notification to the CDFW for a CFG Section 1602 Streambed Authorization Agreement.</p>	Less than significant

Table S-1 (cont.) SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION		
Impact	Mitigation	Significance After Mitigation
<b>HISTORICAL AND TRIBAL RESOURCES</b>		
<p><b>Prehistoric or Historic Resource:</b> <i>Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric site or historic building (including an architecturally significant building), structure, object, or site?</i></p> <p><b>Human Remains:</b> <i>Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?</i></p> <p><b>Tribal Cultural Resources:</b> <i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i></p> <ul style="list-style-type: none"> <li><i>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(K); or</i></li> <li><i>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.</i></li> </ul>		
The potential exists for subsurface resources to occur on the subject property. If present and significant in nature, grading associated with the project would result in a significant impact on these resources.	<p><b>HIS-1: Archaeological Monitoring</b></p> <p><b>I. Prior to Permit Issuance</b></p> <p>A. Entitlements Plan Check</p> <ol style="list-style-type: none"> <li>Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.</li> </ol> <p>B. Letters of Qualification have been submitted to ADD</p> <ol style="list-style-type: none"> <li>The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</li> </ol>	Less than significant



<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<ol style="list-style-type: none"> <li>2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.</li> <li>3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.</li> </ol> <p><b>II. Prior to Start of Construction</b></p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> <li>1. The PI shall provide verification to MMC that a site-specific records search (1/4-mile radius) has been completed. Verification includes but is not limited to a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</li> <li>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</li> <li>3. The PI may submit a detailed letter to MMC requesting a reduction to the 1/4-mile radius.</li> </ol> <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> <li>1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor. <ol style="list-style-type: none"> <li>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</li> </ol> </li> </ol>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<p>2. Identify Areas to be Monitored</p> <p>a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. When Monitoring Will Occur</p> <p>a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</p> <p>b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.</p> <p><b>III. During Construction</b></p> <p>A. Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <p>1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.</p>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<ol style="list-style-type: none"> <li>2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.</li> <li>3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.</li> <li>4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSVs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</li> </ol> <p><b>B. Discovery Notification Process</b></p> <ol style="list-style-type: none"> <li>1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating, or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.</li> <li>2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</li> <li>3. The PI shall immediately notify MMC by phone of the discovery and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.</li> <li>4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.</li> </ol>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<p>C. Determination of Significance</p> <ol style="list-style-type: none"> <li>1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.               <ol style="list-style-type: none"> <li>a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.</li> <li>b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) which has been reviewed by the Native American consultant/monitor and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.</li> <li>c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</li> </ol> </li> </ol> <p><b>IV. Discovery of Human Remains</b></p> <p>If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<p>A. Notification</p> <ol style="list-style-type: none"> <li>1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS) of the Development Services Department to assist with the discovery notification process.</li> <li>2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.</li> </ol> <p>B. Isolate discovery site</p> <ol style="list-style-type: none"> <li>1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.</li> <li>2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.</li> <li>3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.</li> </ol> <p>C. If Human Remains ARE determined to be Native American</p> <ol style="list-style-type: none"> <li>1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.</li> <li>2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.</li> <li>3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health &amp; Safety Codes.</li> </ol>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<p>4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.</p> <p>5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:</p> <p>a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR;</p> <p>b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN</p> <p>c. To protect these sites, the landowner shall do one or more of the following:</p> <p>(1) Record the site with the NAHC;</p> <p>(2) Record an open space or conservation easement; or</p> <p>(3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.</p> <p><b>V. Night and/or Weekend Work</b></p> <p>A. If night and/or weekend work is included in the contract</p> <p>1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.</p>	



**Table S-1 (cont.)**  
**SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION**

Impact	Mitigation	Significance After Mitigation
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<p>2. The following procedures shall be followed.</p> <ul style="list-style-type: none"> <li>a. No Discoveries: In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.</li> <li>b. Discoveries: All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.</li> <li>c. Potentially Significant Discoveries: If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains shall be followed.</li> <li>d. The PI shall immediately contact MMC, or by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</li> </ul> <p>B. If night and/or weekend work becomes necessary during the course of construction</p> <ul style="list-style-type: none"> <li>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</li> <li>2. The RE, or BI, as appropriate, shall notify MMC immediately.</li> </ul> <p>C. All other procedures described above shall apply, as appropriate.</p>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<b>VI. Post Construction</b> <p>A. Preparation and Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> <li>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.               <ol style="list-style-type: none"> <li>a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.</li> <li>b. Recording Sites with State of California Department of Parks and Recreation: The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</li> </ol> </li> <li>2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</li> <li>3. The PI shall submit revised Draft Monitoring Report to MMC for approval.</li> <li>4. MMC shall provide written verification to the PI of the approved report.</li> <li>5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</li> </ol>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HISTORICAL AND TRIBAL RESOURCES (cont.)</b>		
	<p>B. Handling of Artifacts</p> <ol style="list-style-type: none"> <li>1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued</li> <li>2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.</li> <li>3. The cost for curation is the responsibility of the property owner.</li> </ol> <p>C. Curation of artifacts: Accession Agreement and Acceptance Verification</p> <ol style="list-style-type: none"> <li>1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.</li> <li>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.</li> <li>3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.</li> </ol> <p>D. Final Monitoring Report(s)</p> <ol style="list-style-type: none"> <li>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.</li> <li>2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.</li> </ol>	

<b>Table S-1 (cont.)</b> <b>SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION</b>		
<b>Impact</b>	<b>Mitigation</b>	<b>Significance After Mitigation</b>
<b>HEALTH AND SAFETY</b>		
<b>Health Hazards:</b> <i>Would the project expose people or sensitive receptors to potential health hazards?</i>		
During construction, the project would result in potentially significant impacts related to disturbance of soils, slabs, and pavements within the two on-site maintenance areas on-site. Residue from the previous handling and storage of hazardous materials within these areas could result in health hazards to workers during construction.	<b>HAZ-1: Soil Management Plan</b>  Prior to the initiation of demolition and construction activities at the site, the Construction Manager and/or Grading Contractor shall submit a soil management plan (SMP) for approval by the City. The SMP shall outline the procedures for the contractor to identify, segregate, and dispose of any impacted soils discovered in the existing/previous maintenance areas of the subject site during the demolition, grubbing, and grading phases of project construction. The City MMC shall verify implementation of the SMP.	Less than significant

<b>Table S-2                      COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS</b>				
<b>Environmental Topic</b>	<b>Project</b>	<b>No Project/No Development</b>	<b>No Project/ Development Per Community Plan</b>	<b>Reduced Intensity Development</b>
Land Use	LS	N	LS-	LS
Transportation/Circulation	SM	N	SM-	SM-
Visual Effects/ Neighborhood Character	LS	N	LS-	LS-
Noise	LS	N	LS-	LS
Air Quality	LS	N	LS+	LS-
Greenhouse Gas Emissions	LS	N	LS+	LS-
Energy	LS	N	LS+	LS-
Biological Resources	SM	N	SM-	SM
Hydrology and Water Quality	LS	N	LS-	LS
Geology	LS	N	LS-	LS-
Historical and Tribal Cultural Resources	SM	N	SM-	SM-
Public Utilities	LS	N	LS-	LS-
Public Services and Facilities/Recreation	LS	N	LS-	LS-
Health and Safety	SM	N	SM	SM

SM = significant but mitigable impacts; LS = less than significant impacts; N = no impacts

- = comparatively reduced impact relative to the project (if impact designation is the same and impact varies)

+ = comparatively greater impact relative to the project (if impact designation is the same and impact varies)

This page intentionally left blank



# 1.0 INTRODUCTION

This section provides a brief description of the project background and scope, the purpose and legal authority for the Environmental Impact Report (EIR), the EIR scope and process, and an explanation of how the EIR is organized. The project is described in detail in Section 3.0, *Project Description*, and is analyzed within the subsequent sections of this EIR.

## 1.1 Project Background

The project is primarily located on the site of the former Carmel Highland Golf Course, which was constructed in the 1960s and began operations in 1967 as the Rancho Peñasquitos Golf Course, covered by CUP 87-0346 which will be rescinded with the project entitlements. There was a proposal in 2006 by a local developer to replace the golf course and associated DoubleTree Hotel with a mixed-use development including residential and commercial uses, a boutique hotel and a community center with an Olympic-sized pool, tennis courts and a fitness center. That plan was abandoned in 2007 when the recession occurred. The prior owners purchased the subject golf course/hotel property in 2011. While a number of improvements were made to the golf course, the owners decided to close it in 2015, citing reduced golf course usage/revenues and higher water costs as the reasons for the closure. There has been no active use of the site since, and the former golf course is no longer watered. However, the current project applicant actively maintains the site for ~~fire-related/brush management~~ vegetation maintenance purposes.

The current project applicant purchased the golf course property in 2016. The Planning Commission approved initiation of a Community Plan Amendment (CPA) to allow residential development of the property based on a similar concept to the current proposal, with a maximum allowable development of 570 age-qualified residences that would not exceed two stories in height. The current proposal is similar to the original layout concept and would construct 455 age-qualified (55+) homes, plus 81 age-qualified (55+) affordable housing units (536 total units), which satisfies the project's mandatory contribution toward affordable housing in the City of San Diego (City).

To provide for access to the project from Peñasquitos Drive, the applicant completed a lot line adjustment and purchased a portion of the Hotel Karlan property adjacent to the southwest portion of the site, including the existing tennis courts and maintenance yard.

## 1.2 Project Scope

The project is the proposed redevelopment of the existing 112.3-acre Carmel Highland Golf Course with a multi-family, age-qualified (55+) senior community. The project site is currently zoned RS-1-14. This zone is intended for single-unit residential use areas with minimum 5,000 square-foot (SF) lots, within Planned Urbanized Communities. The Rancho Peñasquitos Community Plan (RCP) designates the site as Open Space specifically for use as a golf course. The project would require the approval of a Community Plan Amendment (CPA) to allow the conversion of the golf course to other uses and would add a Community Plan Implementation Overlay Zone (CPIOZ). With the approval of the proposed project and this overlay zone, any future proposals to exceed to limit development to the currently proposed project density of 536 dwelling units would be subject to a discretionary action and further CEQA review. The CPA would redesignate most of the site from Open Space/Golf

Course to Low-Medium Density Residential (i.e., 5 to 10 dwelling units per developable acre). The remainder of the site would remain open space. In addition, the project would require a vesting tentative map (VTM); a rezone; a Planned Development Permit (PDP) to allow the project to deviate in certain ways from the otherwise applicable development standards of the San Diego Municipal Code (SDMC); rescission of existing CUP 87-0346; and a sewer easement vacation. The portion of the project that includes the age-qualified for-sale residences would be rezoned to Residential Multi-family (RM-1-1). Per the SDMC, the RM-1-1 zone is intended for “lower density multiple dwelling units with some characteristics of single dwelling units.” The area identified for the affordable, for rent housing units would be rezoned RM-3-7, which permits “medium density multiple dwelling units.” The proposed CPIOZ would ensure that no development of the site at a higher density than that proposed by the project (536 dwelling units total) could occur without a future additional discretionary action. Open Space zones are meant to “protect lands for outdoor recreation, education, and scenic and visual enjoyment.” The OR-1-1 zone would cover the proposed open space uses around the site perimeter and adjacent to off-site areas. The OP-1-1 zone would cover the remaining proposed usable open space/recreational uses and landscaped open space. The project would develop 455 age-qualified, market rate, for-sale housing units, and 81 age-qualified, affordable, for rent housing units, for a total of 536 units.

## 1.3 Purpose and Legal Authority

The purposes of an EIR are to provide public agencies and the public in general with detailed information about the effect a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project. The City is the Lead Agency, as defined by Section 15051(b)(1) of the California Environmental Quality Act (CEQA) Guidelines, for the project evaluated in this EIR. Under CEQA, the public agency with the greatest responsibility for supervising or approving the project or the first public agency to take discretionary action to proceed with a proposed project should ordinarily act as the “Lead Agency.” This EIR is an informational document for use by the City, decision makers and members of the general public to evaluate the environmental effects of the project. This document complies with all criteria, standards and procedures of CEQA (California Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] Title 14 Section 15000 et seq.); the City’s EIR Guidelines (December 2005); and the City’s CEQA Significance Determination Thresholds (2016a). This document has been prepared as a Project EIR pursuant to Section 15161 of the State CEQA Guidelines, and it represents the independent judgment of the City as Lead Agency (State CEQA Guidelines Section 15050).

## 1.4 Environmental Impact Report Scope

This EIR contains analysis of the project, as described in Section 3.0, *Project Description*. A Project EIR should “focus primarily on the changes in the environment that would result from the development project.” According to Section 15161 of the State CEQA Guidelines, the Project EIR should “examine all phases of the project including planning, construction and operation.”

### 1.4.1 Notice of Preparation/Scoping Meeting

In reviewing the application for the project, the City concluded that the project could result in potentially significant environmental impacts. As Lead Agency, the City prepared a Scoping Letter, which was distributed with the Notice of Preparation (NOP) on April 10, 2018 to all responsible and trustee agencies, as well as various governmental agencies, including the Office of Planning and Research's State Clearinghouse (SCH), and interested individuals. The City also conducted a public scoping meeting, in accordance with Section 21083.9 of CEQA, on April 18, 2018. The EIR addresses in detail potentially significant environmental impacts associated with the following issues:

- Land Use
- Transportation/Circulation
- Visual Effects/Neighborhood Character
- Noise
- Air Quality
- Greenhouse Gas Emissions
- Energy
- Biological Resources
- Hydrology/Water Quality
- Geologic Conditions
- Historical and Tribal Resources
- Public Utilities
- Public Services and Facilities
- Health and Safety

The project would not result in potentially significant impacts with respect to Agriculture and Forestry Resources, Mineral Resources, Paleontology, Population and Housing, and Schools, as described in Section 7.1, *Effects Found Not To be Significant*, of this EIR.

A copy of the Scoping Letter, NOP, Scoping Meeting notice, Scoping Meeting sign-in sheet, and Scoping Meeting transcript are contained in Appendix A. Verbal and written comments received during the scoping process have been taken into consideration during the preparation of this EIR. An outline of the issues noted during the scoping process is contained in the *Areas of Controversy/Issues to be Resolved* discussion in the Executive Summary section. The environmental conditions evaluated as the baseline in this EIR are those that existed at the time the NOP was circulated as described in Section 2.0, *Environmental Setting*.

## 1.5 Public Review Process

This EIR and the technical analyses it relies on ~~are~~were available for review by the public and public agencies for 45 days to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (State CEQA Guidelines Section 15204). The public review period ~~will be~~was from February 19, 2020 to April 6, 2020. The EIR and all supporting technical studies and documents are available for review at the City of San Diego, Development Services Department, 1222 First Avenue, Fifth Floor, San Diego, 92101-4153, as well as at the Rancho Peñasquitos Library and the Downtown San Diego Library. An electronic copy of the EIR and the technical analyses is posted on the City Clerk's website at <https://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>.

The City, as Lead Agency, will consider the written comments received on the Draft EIR and at the public hearing in making its decision whether to certify the EIR as complete and in compliance with CEQA, and whether to approve or deny the project, or take action on a project alternative. In the final review of the project, environmental considerations, as well as economic and social factors, will

be weighed to determine the most appropriate course of action. Subsequent to certification of the EIR, agencies with permitting authority over all or portions of the project may use the EIR to evaluate environmental effects of the project, as they pertain to the approval or denial of applicable permits.

## 1.6 Content and Organization of the EIR

As stated above, the content and format of this EIR are in accordance with the most recent guidelines and amendments to CEQA and the State CEQA Guidelines. Technical studies have been summarized within individual environmental issue sections, and the full technical studies have been included in the appendices.

This EIR has been organized in the following manner:

- Summary provides a summary of the EIR analysis, discussing the Project Description, the alternatives that would reduce or avoid significant impacts, and the conclusions of the environmental analysis. The conclusions focus on those impacts that have been determined to be significant but mitigated. No significant impacts would remain unmitigated. Impacts and mitigation measures are provided in tabular format. In addition, the Executive Summary includes a discussion of areas of controversy known to the City, including those issues identified by other agencies and the public.
- Section 1.0, *Introduction*, provides a brief description of the project, the purpose of the EIR, key discretionary City actions and an explanation of the document format.
- Section 2.0, *Environmental Setting*, provides an overview of the regional and local setting, as well as the physical characteristics of the project site. The setting discussion also addresses the relevant planning documents and existing land use designations.
- Section 3.0, *Project Description*, provides a detailed description of the project, including the purpose and main objectives of the project, building characteristics, infrastructure improvements, landscape plan, and project grading and construction. In addition, the intended and required uses of the EIR, and a discussion of discretionary actions required for project implementation are included in this section.
- Section 4.0, *History of Project Changes*, chronicles any physical changes made to the project in response to environmental concerns raised during the City's review of the project.
- Section 5.0, *Environmental Analysis*, constitutes the main body of the EIR and includes the detailed impact analyses for each environmental issue identified in the NOP as potentially resulting in significant environmental impacts. The topics analyzed in this section include: land use, transportation/circulation, biological resources, historical and tribal cultural resources, visual effects/neighborhood character, air quality/greenhouse gas emissions, energy, noise, hydrology and water quality, geology and soils, public safety, public utilities, and public services and facilities (except schools). Under each topic, Section 5.0 includes a discussion of existing conditions, the thresholds identified for the determination of significant impact, and an evaluation of the impacts associated with implementation of the project. Where the impact analysis demonstrates the potential for the project to have a significant adverse impact on the environment, mitigation measures are provided that would

minimize the significant impact. The EIR indicates confirmation that the proposed mitigation measures would reduce impacts to below a level of significance.

- Section 6.0, *Cumulative Impacts*, addresses the cumulative impacts due to implementation of the proposed project in combination with other recently approved or pending projects in the area.
- Section 7.0, *Other CEQA Sections*, includes a discussion of growth inducement, significant irreversible effects, and the effects found not to be significant.
- Section 8.0, *Project Alternatives*, provides a description and evaluation of alternatives to the project. This section addresses the mandatory “no project” alternative, as well as development alternatives that would potentially reduce or avoid the project’s significant impacts.

The Mitigation Monitoring and Reporting Program (MMRP), References, and Individuals Consulted/Preparers are provided in Sections 9.0, 10.0, and 11.0, respectively.

This page intentionally left blank



## 2.0 ENVIRONMENTAL SETTING

### 2.1 Project Location

The project site consists of the former Carmel Highland Golf Course, the existing maintenance yard for the Hotel Karlan as well as the existing tennis courts previously associated with the hotel, which are being closed. Interstate 15 (I-15) and Carmel Mountain Road form the eastern and southeastern boundaries of the project site, respectively. Primary vehicular access would be provided at Peñasquitos Drive and Janal Way.

The site is located within the northeast portion of the City's Rancho Peñasquitos community, west of I-15, north of Carmel Mountain Road and east of Peñasquitos Drive (Figure 2-1, *Regional Location*, and Figure 2-2, *Project Location and Vicinity*). Rancho Peñasquitos is located in the northeastern portion of the City of San Diego. It is bounded on the east by the communities of Carmel Mountain Ranch and Sabre Springs, on the south by the Los Peñasquitos Canyon Preserve and the Mira Mesa community, and on the west and north by the communities of Black Mountain Ranch and Rancho Bernardo.

### 2.2 Existing Site Conditions

As described in Section 1.0, the Carmel Highland Golf Course was closed in 2015 and is no longer being watered, aside from selective watering of trees in good health. Evidence of the previous golf course use is apparent, including remnants of the original greens and fairways, sand traps, ornamental shrubs and trees, retaining walls, golf cart paths, retaining walls and the like. A former maintenance shed is also present on the golf course property. These have degraded over time. The former golf course property is enclosed by a chain link fence. The southwestern portion of the project site also includes the existing maintenance yard for the adjacent Hotel Karlan and tennis courts previously associated with the hotel, which are being closed.

The rolling topography within the site is not a native condition, as the site was previously filled and graded for the previous golf course use. Elevations range from approximately 750 feet above mean sea level (AMSL) at the extreme northern corner of the project site to approximately 620 feet AMSL at the central eastern portion of the project site (Figure 2-3, *Existing Topography*).

During the biology surveys for the project (HELIX 2019c, as amended), the site was mapped primarily as ornamental, developed, or disturbed vegetation communities. The site drains into an existing channel which runs along the northeastern and eastern portions of the project site. The channel is earthen-bottomed for its northern extent, but transitions to concrete-lined before connecting to an off-site storm drain system that extends under I-15. All flows are ultimately conveyed into Peñasquitos Creek.

Geologic formations identified within or adjacent to the site include the Mission Valley Formation (Tmv) and the Santiago Peak Volcanics (Jsp) formation, as well as undocumented fill (Afu), quaternary colluvium (Qcol), and alluvium (Qal). No faults are known to transverse the site. The closest active faults and associated Earthquake Fault Zones are located approximately 12.4 miles to the west along the Rose Canyon Fault. Refer to Section 5.10, *Geology and Soils*, for additional information.

Existing roadways that abut portions of the project site include I-15, Carmel Mountain Road and Peñasquitos Drive. Peñasquitos Drive is classified as a four-lane major roadway within the Rancho Peñasquitos Community Plan (RPCP), but is currently built as a three-lane roadway (one northbound; two southbound) from Carmel Mountain Road to Cuca Street, and a two-lane divided roadway north of Cuca Street to its existing terminus at the northern Community Plan boundary. Carmel Mountain Road is classified and built as a six-lane prime arterial within the Carmel Mountain Ranch Community Plan but is classified as a six-lane major roadway and built as a five-lane (three northbound; two southbound) divided roadway within the Rancho Peñasquitos Community Plan (for additional discussion, see Section 5.2, *Transportation/Circulation*).

The conditions described above constitute the baseline environmental setting used for addressing changes in the environment resulting from the project. More detailed discussion of the project's environmental setting is provided in Section 5.0, *Environmental Analysis*, and Section 7.0, *Other CEQA Sections*.

## 2.3 Surrounding Land Uses

Refer to Figure 2-4, *Project Site Aerial*, for a recent aerial photograph of the surrounding land uses within approximately 0.5 mile of the project site. Figure 2-5, *Project Site Boundaries Following 2018 Lot Line Adjustments*, depicts current site boundaries relative to Hotel Karlan, including the boundary change that occurred following a lot line adjustment in 2018 (additional information is provided in Section 4.0, *History of Project Changes*). Adjacent land uses include single- and multi-family residential to the west, north and south, and a hotel (the Hotel Karlan DoubleTree Resort) to the south. Residential uses are primarily low-density single-family detached to the north, south, and west and multi-family to the northwest and southwest. To the east across I-15 are commercial shopping centers and office buildings. Further to the west are a water tank and the Black Mountain Open Space Park. The runway for Marine Corps Air Station (MCAS) Miramar is situated approximately 7.5 miles south of the project site along Miramar Road.

## 2.4 Planning Context

The following plans contain policies, goals, and objectives that are applicable to the project. A detailed discussion of these plans is provided in Section 5.1, *Land Use*.

### 2.4.1 City of San Diego General Plan

The General Plan is a comprehensive planning document that guides the City's future development and is the foundation upon which all land use decisions are based. The General Plan sets out a long-range vision and policy framework for how the City will grow and develop, provide public facilities and services, and maintain the qualities that define San Diego. The General Plan is comprised of a Strategic Framework Element and 10 additional elements (including the seven mandatory elements required by state law) that cover a range of planning issues such as housing, transportation, and conservation. The site's General Plan land use designation is Park, Open Space, & Recreation (City 2016f) as well as a small area in the southeast portion of the project identified as Commercial Employment, Retail, & Services, previously associated with Hotel Karlan property.

## 2.4.2 Rancho Peñasquitos Community Plan

San Diego is one of the few jurisdictions in the state that has the size, diversity, and land use patterns that necessitate community-based land use plans. The site is within the RPCP which encompasses approximately 6,500 acres in the northern portion of the City. Rancho Peñasquitos lies 17 miles north of downtown San Diego and 8 miles south of the City of Escondido. It is bounded on the east by I-15 and the communities of Carmel Mountain Ranch and Sabre Springs, on the south by the Los Peñasquitos Canyon Preserve and the Mira Mesa community, and on the west and north by the communities of Black Mountain Ranch and Rancho Bernardo. I-15 provides the eastern boundary of the planning area and State Route 56 (SR 56) traverses east-west through the south-central portion of the community.

The RPCP is the City's statement of policy specific to the growth and development of the RPCP community. The plan identifies the issues, goals, and policies with respect to land use, public facilities, urban design, and environmental constraints. It also designates areas for development of residential, commercial, industrial, business park, and public uses, as well as areas that are to remain undeveloped. Approximately 51 percent of the land area in Rancho Peñasquitos is recommended for residential use. Of that acreage, 76 percent is single-family and 24 percent is multi-family. Two percent of the land area in Rancho Peñasquitos is designated for commercial uses. Parks and designated open space areas comprise 34 percent of the community.

The RPCP's Land Use Map designates the site as Open Space, while the specific map for the site's neighborhood (Glens) identifies the site as "Golf Course." A major plan recommendation for this neighborhood is to "preserve the golf course as a unifying open space element and buffer from the freeway, and to maintain the existing quality of development in the area." Redevelopment of the site to uses other than a golf course would require a Community Plan Amendment.

## 2.4.3 Multiple Species Conservation Program

The City of San Diego is a participant in the San Diego Multiple Species Conservation Program (MSCP), a comprehensive, regional long-term habitat conservation program designed to provide permit issuance authority to the local regulatory agencies for take of covered species. The site is within the boundary of the City's MSCP Subarea Plan, but is not within its preserve planning component, the Multi-habitat Planning Area (MHPA). The precise distance between the project and the City's MHPA varies from 690 to 1,100 feet, and the distance from the project to the boundary of the BMOS varies from 180 to 1,080 feet. MHPA lands occur approximately 0.2 mile west of the site's westernmost boundary, and in all instances, the MHPA is are separated from the site by existing roadways and residential development. The project site is located outside the Coastal Overlay Zone and is not within any lands identified as critical habitat by the U.S. Fish and Wildlife Service (USFWS).

## 2.4.4 Zoning

The underlying zone for the site is primarily Residential (RS-1-14) as shown in Figure 2-6, *Existing Zoning Classifications*, which is a Residential-Single Unit zone that is only found within Planned Urbanized communities or Proposition A lands and requires minimum 5,000-SF lots. A small area in the southeast portion of the project is zoned Commercial Visitor (CV-1-1) and was previously associated with Hotel Karlan property.

## 2.4.5 Airport Land Use Compatibility Plans

The Airport Land Use Commission (ALUC) is an agency that is required by state law to exist in counties in which there is a commercial and/or general aviation airport. The purpose of the ALUC is to protect public health, safety, and welfare by ensuring the orderly development of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that these areas are not already devoted to incompatible uses.

The project site is located within the MCAS Miramar Airport Influence Area (AIA) Review Area 2, about 5 miles outside the MCAS Miramar Community Noise Equivalent Level (CNEL) Noise Contours and Accident Potential Zone (APZ). The project would be subject to Federal Aviation Administration (FAA) Part 77 Noticing Area requirements, which require that the project submit an FAA Determination of No Hazard to Air Navigation to the City prior to recommendation of discretionary approval of the project. With compliance with FAA regulations, the project would be a compatible land use within the Air Installation Compatible Use Zone (AICUZ) of MCAS Miramar.

## 2.4.6 Regional Air Quality Strategy

The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin (SDAB). The San Diego County Regional Air Quality Strategy (RAQS) was most recently updated in 2016. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for ozone. The SDAPCD has also developed the air basin's input to the State Implementation Plan (SIP), which is required under the Federal Clean Air Act (CAA) for areas that are out of attainment of air quality standards. The SIP, approved by the U.S. Environmental Protection Agency (USEPA) in 1996, includes the SDAPCD's plans and control measures for attaining the ozone national standard. The SIP is updated on a triennial basis.

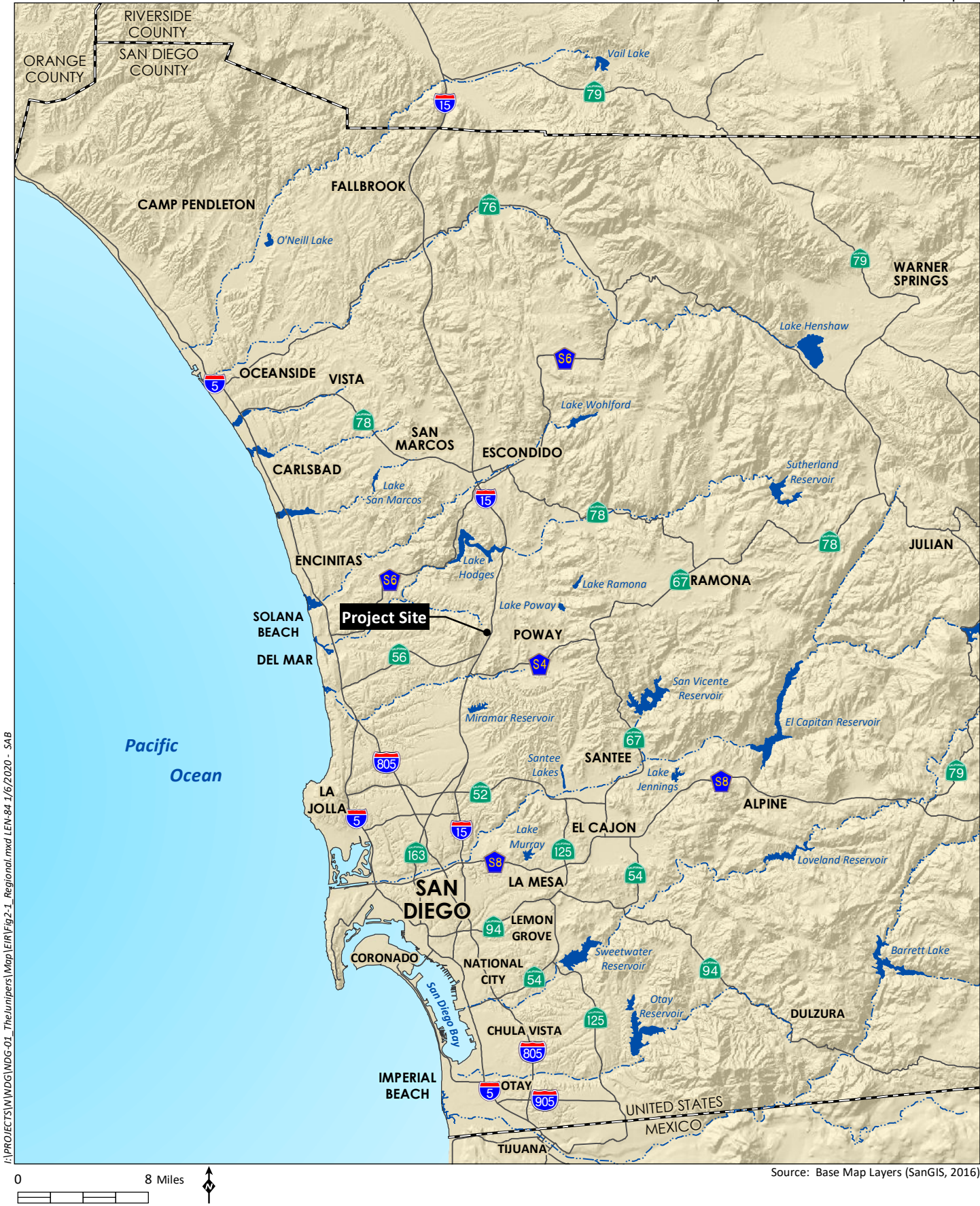
The RAQS relies on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the county, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the SDAPCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the national air quality standard for ozone.

## **2.4.7 Water Quality Control Plan for the San Diego Basin**

The Regional Water Quality Control Board (RWQCB) adopted a Water Quality Control Plan for the San Diego Basin (Basin Plan) that recognizes and reflects regional differences in existing water quality, the beneficial uses of the region's ground and surface waters, and local water quality conditions and problems (RWQCB 1994). Water quality objectives identified in the Basin Plan are based on established beneficial uses and are defined as "the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses." These objectives are incorporated into related regulatory requirements, such as the National Pollutant Discharge Elimination System (NPDES) permitting process.

This page intentionally left blank

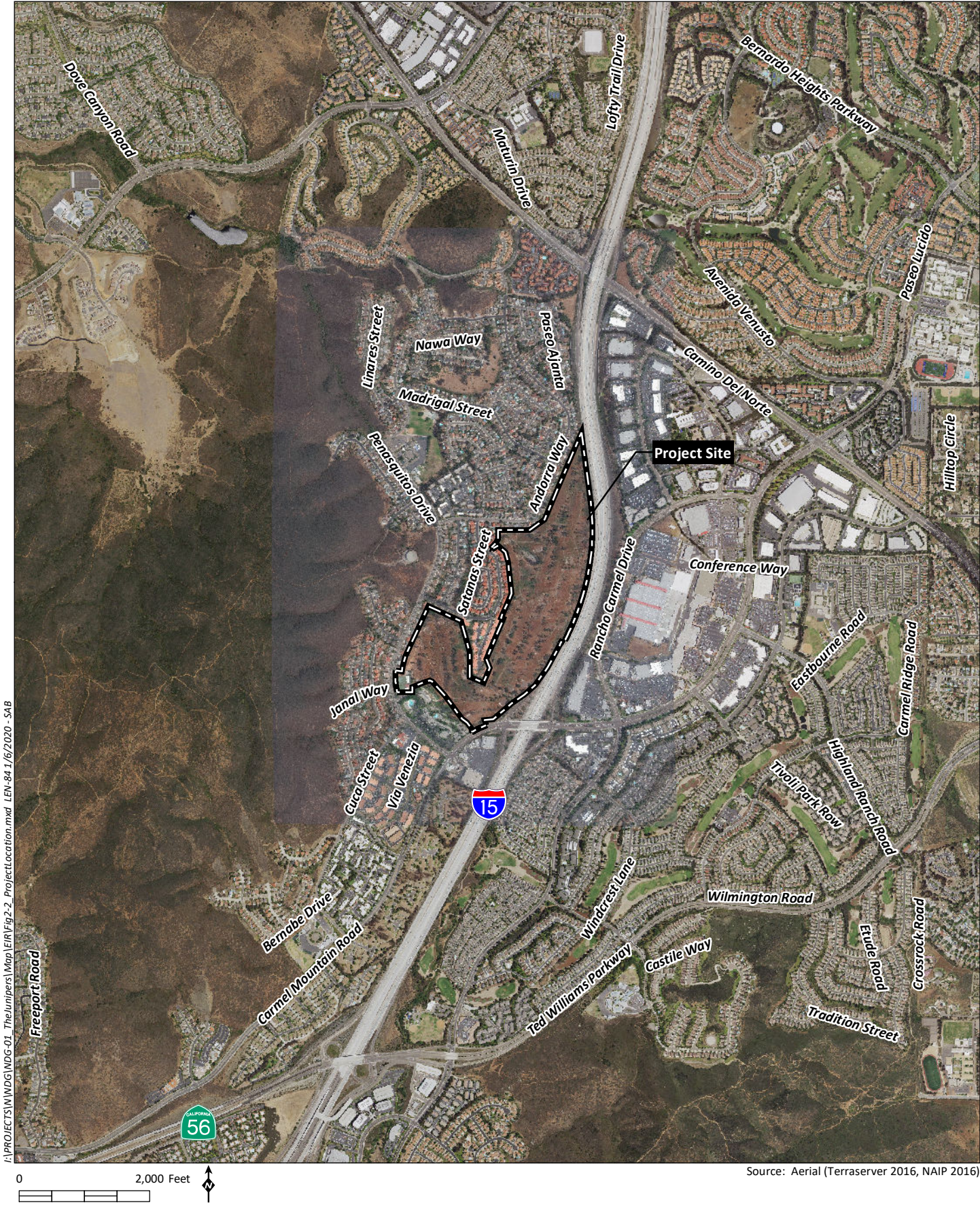




# Regional Location

Figure 2-1







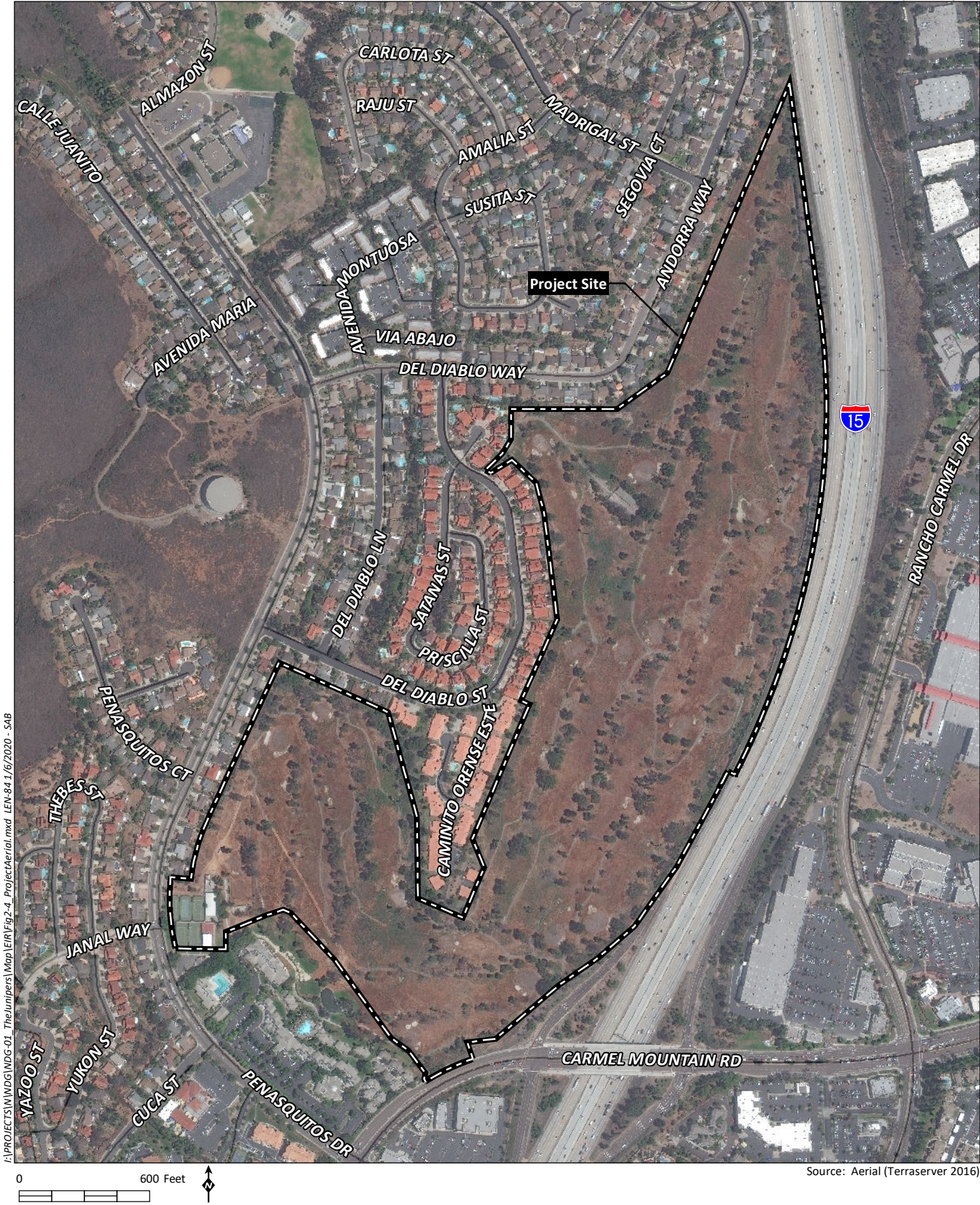


Existing Topography

Figure 2-3

I:\PROJECTS\INWDG\01\_The Junipers\Map EIR\Fig 2-3 Existing Topography.mxd LEN-84 1/6/2020 - SAB







PARCEL SUMMARY

PARCEL	PREVIOUS	CURRENT
1	3.411 AC	1.564 AC
2	12.586 AC	16.097 AC
3	113.991 AC	112.309 AC

I:\PROJECTS\INDG\INDG-01\_TheJunipers\Map\EIR\Fig-5\_LotLineAdjustments.indd LEN-84 1/6/2020 - SAB



Source: Hunsaker & Associates 5/2019



