

Valley Center Community Planning Group

Minutes of the June 11, 2012 Meeting

Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchison

7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082

A=Absent/Abstain A/I=Agenda Item BOS=Board of Supervisors DPLU=Department of Planning and Land Use IAW=In Accordance With N=Nay
P=Present R=Recuse SC=Subcommittee TBD=To Be Determined VCCPG=Valley Center Community Planning Group Y=Yea

Forwarded to Members: 8 July 2012

Approved: As corrected 9 July 2012

1. Call to Order and Roll Call by Seat #:										7: 08PM				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N
A	P	P	P	P	P	P	P	P	P	P	P	A	P	P

Notes: Quinley arrives 7.15pm

Quorum Established: 13 present

Pledge of Allegiance

2. Approval of Minutes:

Motion: Move to approve Minutes of May 7, 2012

Maker/Second: Glavinic/Lewis

Carries/Fails (Y-N-A): 13-0-0 Voice

3. Open Forum:

Claudia and Alfredo Campos speak of their new business in the Wallace Hardware building on Valley Center Rd. They are looking for support from the VCCPG. They are asking for a change of use permit but no zoning change [presently C36]. Hofler asks about the need for a permit since it is not new construction, just remodeling the interior. They will be establishing a fruits and vegetables business. Carl Stiehl, County Advanced Planning, says a certain type of permit is required. But, it can be waived.

4. Discussion Items

4.a.

Discussion of Equine Ordinance. Senior DPLU Planner Carl Stiehl will brief the group about the ordinance. Work has begun on the Equine Ordinance Environmental Impact report. Mr. Stiehl has been conducting interviews with commercial Horse Stable operators to better understand the scope of horse facilities in the unincorporated county. A major purpose of his visit to the VCCPG is to present the outline of the Draft Ordinance, discuss the basics of Board direction and how the project is progressing. (Smith)

Discussion: Carl Stiehl, County Advance Planning, presents [author of Equine Ordinance]. He gives a timeline of draft ordinance creation beginning March 2011. Began with large equine operators. July 2011 BOS approves tiered ordinance. He addresses Horsekeeping – private activity which is not part of the ordinance; Horse Stables - Boarding and Breeding and Public Stables. He presents a mosaic of County animal designators [L designator is most common in VC]. L designation currently requires a major use permit. The new ordinance applies to most of VC. He is recommending four tiers of animal designators in the project area: 3 horses [boarding only not owned by property]; four or more, up to 50 horses [at 10 horses per acre] requires fee [~\$2k]; more than 50 up to 100 [10 horses per acre] – Administrative permit [\$10-20K] needs EIR in addition; More than 100 horses [10 horses per acre] – Major use permit. Glavinic asks about constraints on slope, Steihl replies with other constraints. Hofler asks if 10 horses per useable acre or per acre. Steihl replies it will likely be just per acre. Smith says some parts of county want higher number per acre. Audience question, asker unknown, re density. Valley Center Vacqueros would likely need permit [~\$2K]. Hofler asks about horse shows. Stiehl says allowance can made, but it is a land use that would require some permit. More events mean higher level of permit and fee. Audience [unknown] questions levels of use based on what was happening in VC prior to downturn. Stiehl believes limits should be geared to what a better economy would produce. He questions the need for an allowance for events on private property. Steihl says it depends on number of events, size, whether food is served, etc. Smith reminds that this effort is trying to get everyone in compliance. Tom Baumgardner, resident, adds that Vacqueros needn't have a permit for shows on parks and recreation land. Davis expresses no sympathy for those who move next to a horse property. But, he does sympathize with residents when a commercial

	operation starts up in a residential area. Steihl says some other counties require use permit for any number of horses. San Diego is more liberal in its proposal. EIR is still to come. County wants to look at worst-case scenario. The County is changing animal setbacks to clarify limits; definition of 'barn' differs from horse stable, and is not included in residential requirement. Events already covered. Davis asks about horse shelter limits. Stiehl says no limit on horse shelters because they are a commercial use. Fencing needs to be clarified. Manure management will be an issue. Parking for Horse facilities is not defined. Signs are an issue. Another section will address signs. Vector control is a Health Department permit issue and will be referenced in ordinance. Glavinic asks about setbacks that come into issue if neighbor moves in and builds close to minimum setback. EIR will include: Aesthetics, air quality, biological and cultural resources, greenhouse gas emissions, hazardous waste, hydrology and water quality, land use and planning , noise, and traffic. The County is preparing the EIR now, with public review by Oct 2012, review comments early in 2013, and planning commission and BOS review and approval by mid 2013. Commercial activities after 1978 will need a permit. Prior to 1978 operations are grandfathered.														
4.b.	Vick relates successful effort at fundraising for Bear Sculpture purchase [\$15K]. Major contributors are Rincon and San Pasqual Indian tribes.														
5.	Action Items:														
5.a.	No item listed as 5.a. on the agenda														
5.b.	Discussion and vote on new members for the Lilac Hills Ranch subcommittee following the resignation of two members. Vote on motion to change name of subcommittee from I-15/395 Master Planned Community to Lilac Hills Ranch Subcommittee. (Hutchison)														
Discussion: Continued for lack of time															
Motion:															
Maker/Second: Hutchison/Hofler								Carries/Fails (Y-N-A): 10-1-2							
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N	
	Y	Y	N	R	Y	Y	Y	Y	Y	Y	R		Y	Y	
Notes: Britsch and Jackson recuse themselves from discussion and vote because of proximity of their property to the project.															
5.c.	Lilac Hills Ranch (formerly I-15/395 Master Planned Community) GPA 12-001, Project Number 3810-12-001, applicant is Accretive Investments, Inc., project location is 32444 Birdsong Drive, Escondido, CA and West Lilac Road; Project Contact person is Jon Rilling, 858 546-0700; DPLU planner is Mark Slovick, 858 495-5272. Project proposes to develop a 608-acre mixed use development of 1,746 dwelling units, a commercial village center, a park, public and private trails, retail uses, and a school site. Also proposed are a recycling and waste transfer facility, a water reclamation facility and active orchards. VCCPG will discuss and vote on a report from the subcommittee concerning the adequacy of the project description, compatibility of the project with the character of the local community, consistency of the proposal with the Community Plan and zoning regulation and specific noise, water quality, and depletion of groundwater. (Hutchison)														
Discussion: Hutchison, SC Chair, presents an introduction of the SC review effort to date. Sandy Smith, SC Vice Chair, outlines report of SC [See attached report and recommended comments]. S. Smith describes the project and materials received from DPLU for review. She outlines the materials not yet released. Glavinic asks about Dr. Lou Obermeyer's facility availability form and whether Bonsall School District provided a form. S. Smith says there is a form from VCUSD but no form from Bonsall. Davis asks about density bonus law that would allow for 15-18% bonus density. S. Smith addresses the zoning boxes on the Tentative Maps. She describes the buildings proposed. She addresses the General Plan Environmental Impact Report maps included in the report. Vick asks about size of open space lots. S. Smith says it is the mean size not specific size of open space lots. Vick asks about an aspect of the grading map. Glavinic asks about improvements proposed for emergency evacuation. No improvement is noted. Glavinic asks about the precedent set by the anticipated development at Highway 76 and Interstate 15. S. Smith says that project is a special use because of the Palomar College campus to be built there. She then addresses 'sustainable community' issue followed															

by discussion of regional roads for area. Hofler asks about regional transit corridors and 'hole' near Chula Vista. Smith can't respond. She then discusses the General Plan and Community Plan. This project was not included in General Plan. She compares General Plan with project proposals. She adds that Fallbrook High School is also a possible proposal for use by the project. She addresses concerns with that possibility. She addresses 'Leeds' issues, air quality, transportation network, waste recycling and transfer facility, agriculture, and conclusions. Glavinic is looking for road network relief for eastern Valley Center, and he thinks it is premature to dismiss this project. He thinks it would be worthwhile to negotiate with a developer in order to see what we can get from such a development. Hoffer approves of report, suggests Glavinic abstain. Expresses her feelings about expectation for rural living if one buys in a rural area. She suggests present owners should have priority. Norwood-Johnson addresses 'one bite of the apple' notion in relation to public review of project. Hutchison adds that he questioned Slovick about that and was assured that these proposed comments did not constitute the 'one bite of the apple'. O. Smith wants to have a copy of the email from Hutchison about 'one bite of the apple' position of the County. Davis suggests we cannot get anything out of such development except at the expense of the local residents. He elaborates on the problem of concentrating growth in western VC. Glavinic responds regarding emergency evacuation and County's lack of planning for public safety and evacuation. He asks for solutions about getting County to address safety issues. Vick asks about documenting conversation with Slovick and Remaiya. Greg Duchmak, resident, recounts history of Lilac Triangle and the roads proposed and deleted. He questions the likelihood of evacuating 5000 people over the Walter F. Maxwell Memorial Bridge. He suggests adding more density will amplify the problem of congestion. Chris Brown, consultant for applicant, confirms that VCCPG has not had its 'one bite of the apple'. He explains the desirability of having another 45 days to review the Specific Plan text. This would allow a single review of comments. He explains the release of documents and the process for review. He would be happy to work with VCCPG in any way possible. Hoffer, asks about General Plan Amendment Report and why County is writing it. She says it creates a conflict of interest for County. Brown agrees. Brown says County is also writing other technical reports. Quinley approves of report and asks VCCPG to approve it. S.Smith addresses evacuation routes and roads and suggests pressuring BOS to spend money on infrastructure. She disagrees that Lilac Hills Ranch is a vehicle for making the case for improved infrastructure. She wants to take action to cause the expenditures of County reserve funds for improvement of infrastructure such as roads.

Motion: Approve the Lilac Hills Ranch Subcommittee's report and appended initial comments regarding the submissions to the County by Accretive Investments, Inc. for the Lilac Hills Ranch project, noting that a more comprehensive response is precluded by not receiving key documents such as the General Plan Amendment Report, Specific Plan text, and technical and environmental reports in time for this review.

Maker/Second: Hutchison/Hofler										Carries/Fails [Y-N-A]: 10-1-2				
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N
	Y	Y	N	R	Y	Y	Y	Y	Y	Y	R		Y	Y

Notes: Britsch and Jackson recuse themselves from discussion and vote because of proximity of their property to the project.

5.d. Discussion, possible Harrah's presentation, and possible vote on recommendations, Rincon San Luiseno Band of Mission Indians, Harrah's Casino Resort Expansion project, Rincon Reservation, Valley Center. The Tribal Subcommittee will review and make recommendations on the Draft Environmental Evaluation and assess the potential for off-reservation environmental impacts as a result of the Harrah's Rincon Casino Resort Expansion project. The expansion would include approximately 14,871 square feet of additional gaming floor, a 2,500-seat multipurpose room, expanded restaurant and ancillary facilities, a 21-story, 402-room hotel tower, pool area expansion and an additional surface parking area. (Glavinic).

Discussion: Glavinic introduces Nicki Symington, public relations for Rincon. Joe Martinez, consultant for Rincon, says the tribe is in the process of master planning their casino. The tribe is presently in phase 7 of that planning process. He addresses the public hearing AES had on Environmental Evaluation [EE] report. Martinez introduces John Borman who

did the traffic component of the EE. Martinez describes the extent of expansion in terms of a new hotel tower, pool addition, gaming floor expansion, event center [multipurpose room], new bar, restaurant, and an additional parking lot. He anticipates completion at the end of 2014. He says the tribe is not required to expand their wastewater plant presently, and it has capacity for the early phases of the expansion. The tribe will expand the wastewater treatment facility during the final phases. Hofler asks about shift change or concert event traffic that is already felt in VC. She asks about mitigation of traffic with expansion. Martinez says there is adequate parking on site. He hesitates about impacts to VC traffic at peak times. He says it is addressed in the traffic portion of EE. Hofler continues to question what analysis is included in the EE. Borman says it addresses development anticipated in the 2020 plan. Glavinic questions traffic numbers and the impacts the expansion would cause in VC. He says the EE addresses Valley Center Road from Cole Grade to Lake Wohlford but doesn't address impacts on rest of Valley Center Road to Lilac Road and at the bottom of the grade. He adds that it does address Lake Wohlford Road. But, it did not address Old Castle/Lilac impacts. He expresses concern about choke points in VC that will be exacerbated by additional casino traffic. He asks about emergency evacuation and the traffic burden of additional casino patrons in an already tenuous situation. He expresses mutual concerns from Tribal Liaison SC and Mobility SC about road issues. He identifies Valley Center Road at the bottom of the grade, Lilac/Old Castle and Mirar De Valle as issues to be addressed. Glavinic emphasizes the seriousness of the situation. Quinley asks about the decline of Atlantic City, NJ and Las Vegas, NV with diminishing returns on investment and why the tribe thinks this proposal is workable. Martinez responds that the issue is peripheral to this project. Addresses rural location of casino, and Harrah's management expertise. He says presently the hotels are operating at 92%. He says other casinos are closer to I-15 and don't require overnight stays as much. Davis asks about mutual information exchange and mutual interests regarding VC roads. He says much of the casino bus traffic uses Old Castle/Lilac. Davis says much of the concert traffic uses Valley Center Road. He cites traffic during events. He says the County will require some sort of traffic mitigation and recommends that tribe mitigate the lane constriction of Valley Center Road from Beven Dr. north past the Lake Wohlford Road intersection in Escondido. Glavinic suggests distribution of the Sub committee comments to all parties involved. Simonton says County gets money from the tribes to create a fund for road mitigation. She wonders if it is possible to have a group meeting with the two planning groups [Pala/Pauma and Valley Center], the County, and the nearby Cities to discuss these issues. She thinks a collaboration of parties would be more effective at addressing mutual issues. Smith suggests there have been difficulties gathering those entities to talk in the past. Therese Coelho, resident, speaks to safety issues along VC roadways and the different perspectives of casino users and rural residents. She cites the 24-hr noise from traffic. Jim Quisquis speaks to Mobility SC letter and disagrees with the notion that Valley Center Road widening was caused by casino traffic. He says that the widening was planned before the advent of the casinos. He laments the powerlessness of local residents to control their own destiny. He says the San Pasqual tribe committed money to deal with median maintenance of VC Road, but the County refused it. He asks to renew the request to tribes to join the conversation on mutual issues. Smith says we are at a point to gather multiple tribes, multiple planning groups and form a coalition to address issues of mutual interest. Smith asks Tribal Liaison SC to try to put together this meeting and take the issues raised by our SCs as a starting point. He asks around the table for agreement on this and gets it. Smith asks Jim Quisquis to work on tribal side to further this effort. Tom Bumgardener, audience, says he meets with tribes regularly and they talk about roads routinely. He will forward an invitation to Larry Glavinic to attend these meetings. Symington says tribes can create joint powers with cities and the county and could work together to get funding. She says it is possible to coordinate regionally.

Motion: 9.55 pm motion to extend meeting time 15 minutes

Maker/Second: Smith/Norwood-Johnson

Carries/Fails: 12-0-0 [Y-N-A] **Voice**

Motion: Move that VCCPG team with other planning groups and the Rincon and other tribes [Pauma, San Pasqual and Pala] to address road issues and ask Rincon to contribute funds to mitigate certain traffic problems confronting Valley Center

Maker/Second: Smith/Norwood-Johnson

Carries/Fails: 12-0-0 [Y-N-A] **Voice**

Notes: Quinley leaves discussion at 9.54 pm

5.e

Discussion and vote on changing name of the General Plan Update Committee to Community Plan Update Committee. Change the mission from "prepare draft Revision of the Community Plan to implement and augment new County General Plan. (Smith)

Discussion: Smith announces desire to rename GPU SC. No further discussion

Motion: Move to accept name change of GPU SC to Community Plan Update Subcommittee as noted

Maker/Second: Smith/Hofler

Carries/Fails (Y-N-A): 14-0-0

5.f

Discussion and vote on motion to commend and thank Sandy Smith for her outstanding service to VCCPG as she relocates to Sacramento; announcement of open seat created by her resignation from the I-15 corridor Design Review Board. (Quinley)

Discussion: Continued for lack of time	
5.g.	Discussion and possible vote on a letter in support of DPLU receiving a SANDAG grant for County Bicycle Transportation Plan update by end of June. (Smith)
Discussion: Removed from agenda	
5.h.	Discussion and possible vote on letter to DPLU listing concerns with SB162 provision that A state agency shall not oppose a fee-to-trust land acquisition application that is for the purpose of housing. (Smith).
Discussion: Continued for lack of time	
6.	Subcommittee Reports & Business:
a)	Mobility – Robert Davis, Chair
b)	GP Update – Richard Rudolf, Chair
c)	Nominations – Hans Britsch, Chair
d)	Northern Village – Ann Quinley, Chair
e)	Parks & Recreation – Brian Bachman, Chair
f)	Rancho Lilac – Ann Quinley, Chair - inactive
g)	Southern Village – Jon Vick, Chair
h)	Spanish Trails/Segal Ranch – Mark Jackson, Chair. - inactive
i)	Tribal Liaison – Larry Glavinic, Chair
j)	Website – Robert Davis, Chair
k)	Pauma Ranch – Christine Lewis, Co-Chair; LaVonne Norwood-Johnson, Co-Chair.
l)	I-15/395 Master Planned Community [Accretive] – Steve Hutchison, Chair
m)	Equine Ordinance - Oliver Smith, Chair
7.	Correspondence Received for September 12, 2011 Agenda:
a)	San Diego County Planning Commission to VCCPG; Final Agenda, San Diego County Planning Commission for meeting on May 18, 2012 at 9:00 AM, 5201 Ruffin Road, Suit B, San Diego, CA.
b)	DPW to VCCPG; Response to communication from Tina Mancino (TMancino82@gmail.com) requesting a walk path along Woods Valley Road near Bates Nut Farm. (Rudolf)
c)	DPW to VCCPG; Traffic Department Customer Survey regarding VCCPG's service request #102-19R-Fruitvale Rd and Stargaze Lane. (Davis)
d)	Email from DPLU Planner Bob Citrano to VCCPG Chair June 1, 2012 requesting letter of support for County Bicycle Transportation Plan update SANDAG grant. (Smith)
8.	Motion to Adjourn:
	Maker/Second: Smith/Hutchison
	Carries/Fails (Y-N-A): 12-0-0
Note: Next regular meeting scheduled for July 9, 2012	

Appended materials for item 5.c.:

***REPORT Of The LILAC HILLS RANCH SUBCOMMITTEE To The
VALLEY CENTER COMMUNITY PLANNING GROUP
11 JUNE 2012***

Chairman Smith:

The Lilac Hills Ranch Subcommittee [formerly the I-15/395 Master Planned Community Subcommittee] has met on ten occasions since June 2011 to discuss the proposed Accretive Investments, Inc., Lilac Hills Ranch project set for the Lilac Triangle of Valley Center. The project has asked for 1746 dwelling units combined with commercial developments in three areas on the 608 acres of the project site.

Initially we studied the February 7, 2011 letter sent by the County's project manager, Mark Slovick, in response to the PAA submitted by Accretive Investments, Inc. That letter outlined in comprehensive form

concerns and requirements that Accretive would have to address in their submissions of a General Plan Amendment, Specific Plan text and technical and environmental reports among others.

On April 30, 2012, Accretive submitted documents for its planned project. The subcommittee subsequently received a handful of tentative maps, some addressing the first phase of their development, others more generally the entire project, a landscaping plan, grading plans, a two page project description, a phasing map and plans for both temporary and permanent waste water treatment facilities. We received no General Plan Amendment Report, Specific Plan text, nor technical and environmental reports, the County's project manager saying that while they were received, they were not yet released for public review. We questioned the validity of this approach, but were told that it was consistent with other projects of this size and scope. On June 5, 2012, the Specific Plan text was released on a County website for the project, too late for consideration in this report.

The County's staff has 45 days to respond to the information submitted and accepted, and we were asked to respond, if we could, within the same period so our comments could be combined with those of the staff. Since receiving the documents from DPLU, we have met three times to develop the comments that are attached for approval by VCCPG. Given that we did not receive all the documents needed to make comprehensive comments, our approach has been to reserve detailed comments for a later time when all documents and details are available. Instead, we have tried to keep our comments to a high level, with emphasis on general compliance with the County General Plan and Valley Center Community Plan and consistency with the character of Valley Center and the region.

Motion: Approve the Lilac Hills Ranch Subcommittee's report and appended initial comments regarding the submissions to the County by Accretive Investments, Inc. for the Lilac Hills Ranch project, noting that a more comprehensive response is precluded by not receiving key documents such as the General Plan Amendment Report, Specific Plan text, and technical and environmental reports in time for this review.

Comments:

June 11, 2012

To: Mark Slovick
Project Manager

Fr: Valley Center Community Planning Group

Re: 1-15/395 Master Planned Community MPA
3810-12-001 (SP12-001)

On May 3, 2012, The Valley Center Community Planning Group (VCCPG) received documents on the above project. We believe that the documents provided by DPLU and Accretive concerning the 1-15/395 Master Planned Community MPA (herein referred to as the Project) are not sufficient to allow adequate review or analysis of the project. Our review of the Project seems very premature. However, we would like our comments in response to the minimal materials provided to date to be on record. We reserve the

right to make additional comments as more documentation is released to the community. This should not be construed as our ‘one bite of the apple’.

Documentation

The documents provided to date are missing answers to most of the fundamental questions that have surfaced in earlier iterations, information about how the project will deal with issues like sewage, schools, fire protection and roads and even information about where housing and commercial will be built on the site.

We received the following documents in time to be included in this report:

1. Project Description
2. Community Planning or Sponsor Group Project Review
3. Project Summary (this is the notice sent to neighbors)
4. Project Facility Availability Form from VC Water District
5. Project Facility Availability Form from Deer Springs Fire District
6. Master Tentative Map
7. Master TM Grading Plan
8. Implementing Tentative Map
9. Implementing TM Preliminary Grading Plan
10. Implementing TM Landscape Concept Plan
11. Temporary Sewer Treatment Facility

The Specific Plan Text was posted on the Project website on June 5, which was too late to include in this report. We have yet to receive the General Plan Amendment Report and any technical studies. Without detailed explanations, the documents provided are difficult to review, consisting, as they do, of many similar-appearing maps that go largely unexplained.

The lack of the General Plan Amendment Report is especially problematic because the applicants are seeking entitlements that would sanction urban development in a rural area remote from where urban services have been planned either by the San Diego County General Plan (approved less than a year ago) or by the SANDAG Regional Transit program for 2050. Moreover, the application is accompanied not by a detailed tentative map for the entire property, but by a master tentative map that provides no detail about how this “city” will be developed.

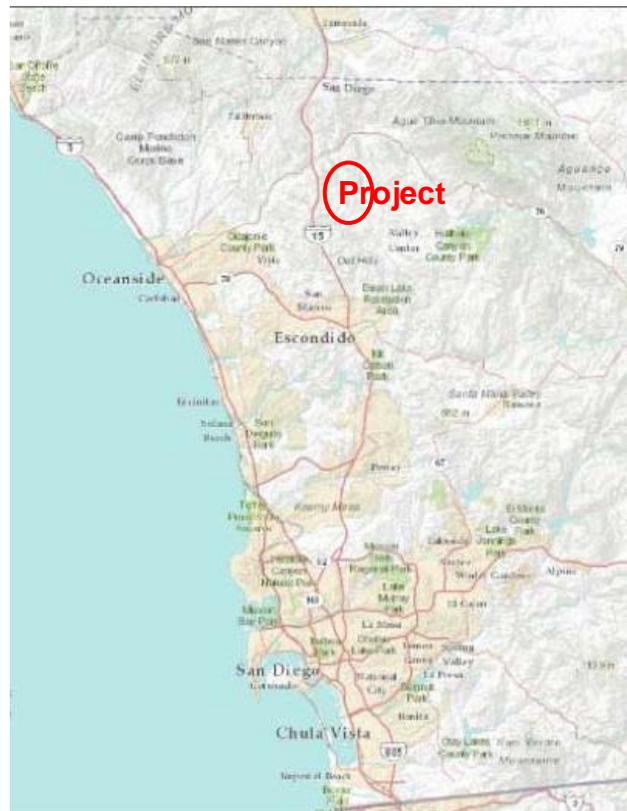
Without those additional descriptive and technical documents in hand, we are unable to provide in this report comprehensive, reasoned comments on the entirety of the proposed project. It is impossible to understand the objective, the details of this proposal, or to even view the rationale for how this proposal can be consistent with the newly approved County General Plan and Valley Center Community Plan.

The Project

The Project is on 608 acres located in part of San Diego County with acreage in Bonsall and Valley Center unincorporated communities. The component of the Project builds 1746 units with Residential Urban densities 2.9 du/ac to 30 du/ac. The Project is a condominium project with commercial use of unknown size.

Proposed zoning information shows commercial and residential use on lot sizes of 3,200, 4,000, 4,500, 5,000, 6,000, a maximum of 1.0 acre. Neither the location of the land in each lot size nor the specific details of the lots is known. The Project uses building types of multi-dwelling and single detached homes. The heights of the buildings in the Project range from 2-stories at 35' to 3-stories at 40'. Animal regulations would change to the most restrictive use allowed.

The first implementing phase plans for 350 homes on 59 acres in the northeastern part of the Project. This equates to more than 6 dwelling units per acre once the street acreage is removed. The border is West Lilac Road.



the northern part of the project is in both the Bonsall and Valley Center unincorporated communities. The component of the Project builds 1746 units with Residential Urban densities 2.9 du/ac to 30 du/ac. The Project is a condominium project with commercial use of unknown size. Proposed zoning information shows commercial and residential use on lot sizes of 3,200, 4,000, 4,500, 5,000, 6,000, a maximum of 1.0 acre. Neither the location of the land in each lot size nor the specific details of the lots is known. The Project uses building types of multi-dwelling and single detached homes. The heights of the buildings in the Project range from 2-stories at 35' to 3-stories at 40'. Animal regulations would change to the most restrictive use allowed.



plans for 350 homes on 59 acres in the northeastern part of the Project. This equates to more than 6 dwelling units per acre once the street acreage is removed. The border is West Lilac Road.

Of the 608 acres, a total of 70.88 acres, or 11.65%, are identified as open space divided into 12 lots. This yields a mean open space lot size of about 2 acres. The Project grading plans call for movement of 4,400,000 cubic yards of earth on the proposed site.

The submitted wastewater plan indicates a temporary plant to be used with the early phases, and then replaced with the permanent facility. Both are located adjacent to the eastern edge of the largest open space lot, which runs in a north-south corridor along the western edge of the Project. This open space lot appears to be a habitat linkage and contain riparian habitat.

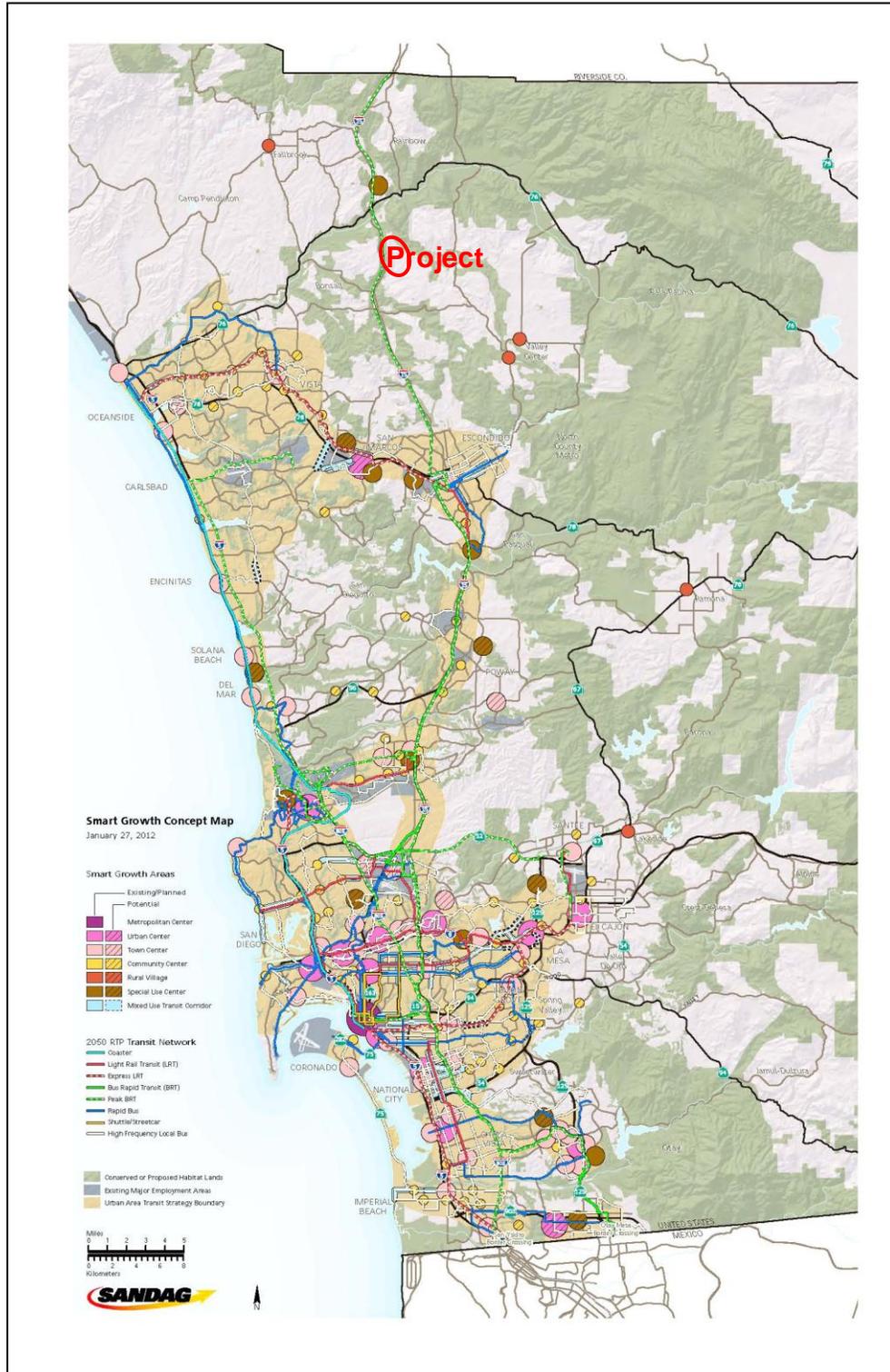
The Project plan reroutes the existing West Lilac Road into their property and adds public roads with roundabouts. The Project proposes changing the name of the existing West Lilac Road to Old West Lilac Road. Some roads cross property that is not in the Project.

According to EIR maps from the General Plan, the Project area includes extreme and very high levels of fire threat, noise, riparian habitat, habitat linkages, potential mineral resources, unique farmland and farmland of local importance, prime agricultural soils, coastal sage and chaparral, slopes over 25%, potential liquefaction and expansive soils.

Approved Regional Plans

In relation to the Diego region, the Project is well of the urban center county. The Project is more 15 miles from the nearest employment and center as shown SANDAG Smart Growth Concept Map. The Project is 45 from downtown Diego and 37 from Sorrento Valley, other employment areas. North County, the Project is 22 miles Highway 78 employment centers.

SANDAG developed a Sustainable



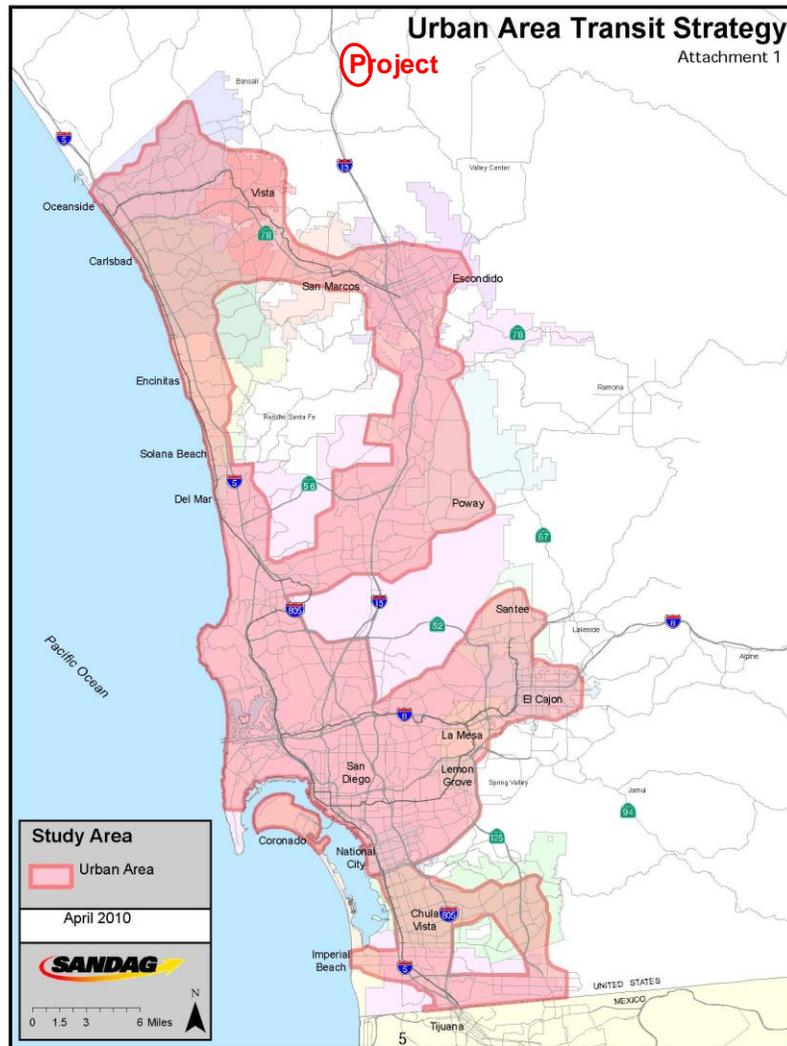
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Communities Strategy (SCS) as part of the 2050 Regional Transportation Plan (RTP) in order to comply with California Senate Bill (SB) 375. The RTP and SCS were both adopted by the SANDAG Board of Directors

on Oct. 28, 2011. SB 375 went into effect in 2009, adding statutes to the California Government Code to encourage planning practices that create sustainable communities. The law also requires the SCS land use pattern to align with the Regional Housing Needs Assessment. That way housing, land use, and transportation planning are integrated.

The only regional road improvements planned Escondido on Interstate privately funded Toll High Speed Rail line, expansion of the Bus Transit route. However, projects are a low the regional dollars, with majority of transportation improvements focused urban corridors of and 15, and along 78 between Escondido coast.

The San Diego General based on a set of guiding designed to protect the unique and diverse natural resources and maintain the character of its rural and semi-rural communities. It reflects an environmentally sustainable approach to planning that balances the need for adequate infrastructure, housing, and economic vitality, while maintaining and preserving each unique community within the County, agricultural areas, and extensive open space. The General Plan directs future growth in the unincorporated areas of the County with a projected capacity that will accommodate more than 232,300 existing and future homes.



north of 15 are a Road, the and Rapid these priority for the vast on the Interstate 5 Highway and the Plan is principles County's

Approved Community Plans

The Valley Center Community Plan, like the County of San Diego General Plan, was a 12-year public project with broad-based participation on the part of hundreds of citizens, property owners and developers. The adopted Valley Center plan doubles Valley Center's population. The Project was not proposed in time to be considered in the General Plan. Protection of the Project area was a major topic of community discussion and planning during the General Plan Update.

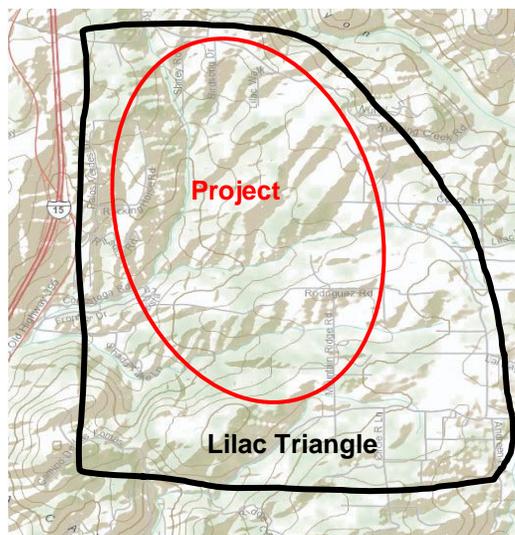
Valley Center is characterized by its agriculture, horticulture and livestock uses, scattered semi-rural residential development and the concentration of commercial and industrial uses in the North and South Villages along Valley Center Road. Valley Center residents consider their community to be one of the few places left in North San Diego County where one can enjoy a natural, rural environment and moderate climate while at the same time living within a reasonable distance to employment centers and other regional urban services.

Valley Center's rural character will be best maintained by focusing population growth in the community's North and South Village areas, and by limiting Village Residential densities to these areas. Residential densities decrease from the Villages outward to semi-rural and rural areas, which are located at the exterior limits of the Community Planning Area, including the Lilac Triangle.

The Lilac Triangle

The Project site is in an area known locally as the Lilac Triangle, bordered by West Lilac Road on the north, Circle R Road to the south, and Old Highway 395 to the west. In the General Plan, this area was approved to continue as a mix of agricultural and semi-rural residential uses with typically one dwelling unit on 2, 4, or 10-acres, although larger lots still exist.

The Lilac Triangle is characterized by creek-steep canyons, with sections of rolling hills, proximity of I-15 for commuter access. This contains the main section of Keyes Ranch. The main development pattern in this residential uses along the creek-bottom areas, estate-style homes and some groves and on the rolling hills.



bottoms and
and the general
area also
Creek/Lilac
area is older
with newer
flower farms

Building in this area is dominated by homes, active agriculture flower and groves,

Concerns for this area include the remaining parcels to and uses that are with agricultural

and slope preservation, preservation of scenic and riparian valley areas that characterize Valley Center, and design/improvement of roads to eliminate unsafe situations.

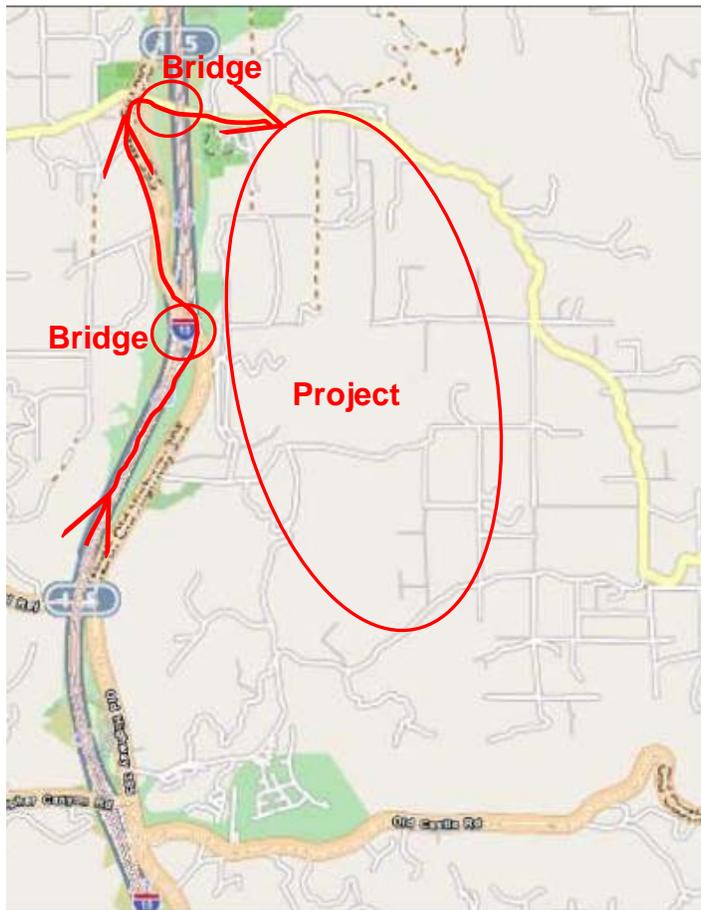


area is single-family economically in cactus, and vacant lots.

development in conversion of undeveloped residential use, incompatible uses, ridgeline

The road network in and out of comprised of West Lilac Road Road and Old Highway 395. roads in the Lilac Triangle are private, unconnected and often to the area from the south, via Interstate 15, traverses two two-bridges which will be highly the Project.

Both Valley Center-Pauma and School District boundaries lie Lilac Triangle. There is no middle or high school currently The nearest schools are 14 miles from the Project and on two-lane windy roads with the time to traverse between 12- 30 minutes.



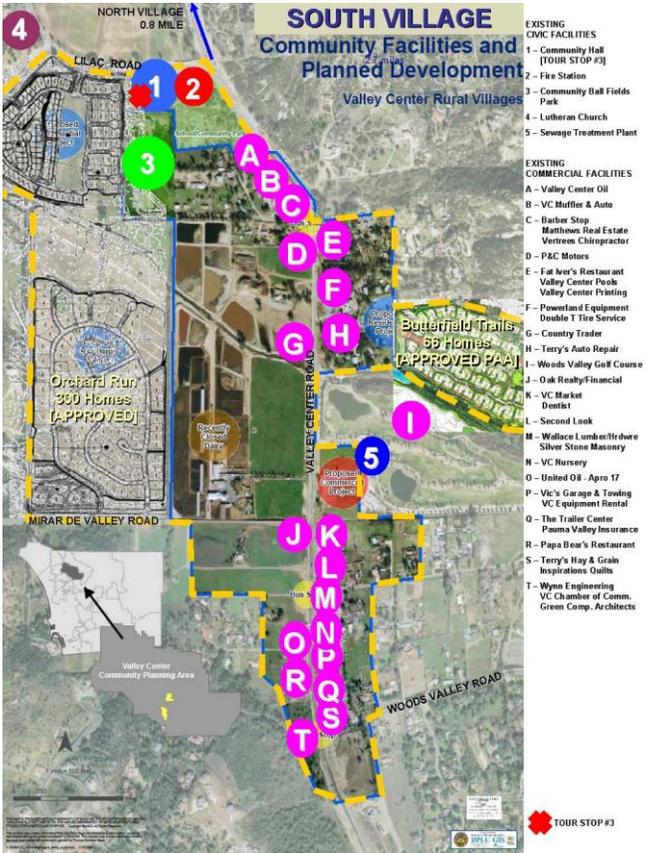
the Triangle is and Circle R The other generally dirt. Access northbound lane overpass impacted by

Bonsall within the elementary, in the Triangle. between 5 and require travel

Valley Center Villages

From VC's earliest days the town's commercial crossroads have been located in the central valley along Valley Center Road. This historical development pattern was formalized 50 years ago with the first official community plan in the 1960s. With the most recent GP update which was approved in August 2011, Smart Growth principles guided the decision to intensify development in the central valley's two traditional village "nodes", and to retain larger parcels in the remote and rugged peripheral parts of the planning area for agriculture, horticulture and animal husbandry. Many hundreds of residents, long-time property owners, developers and investors, consultants, and local and regional public agencies have invested thousands of hours and several million dollars, public and private, in Valley Center's Community Plan.

The South Village is located on about 603 acres that straddle Valley Center Road between Woods Valley and Lilac Roads. The North Village is located on about 951 acres in the northwest and south west quadrants of the intersection of Valley Center and Cole Grade Roads. The two Village areas are separated by a steep escarpment and the valleys of Keyes and Moosa creeks that are designated for Semi-Rural residential homes. This arrangement follows historical settlement patterns. Many parks, local retail businesses, professional offices, light industries and a small number of homes are already located in these two locations. More intense development has been prevented in these two locations until now because the area has lacked wastewater treatment facilities.

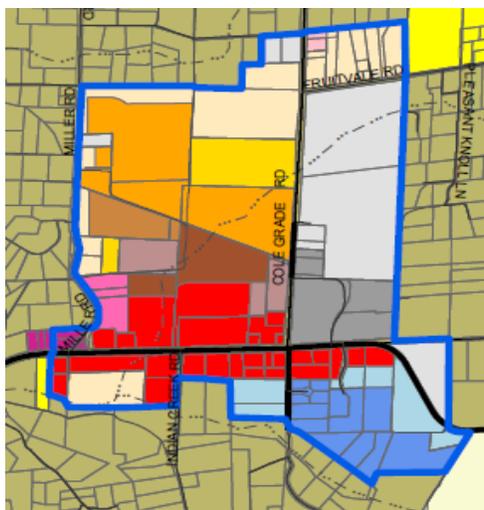


During the period 2000-2010 several

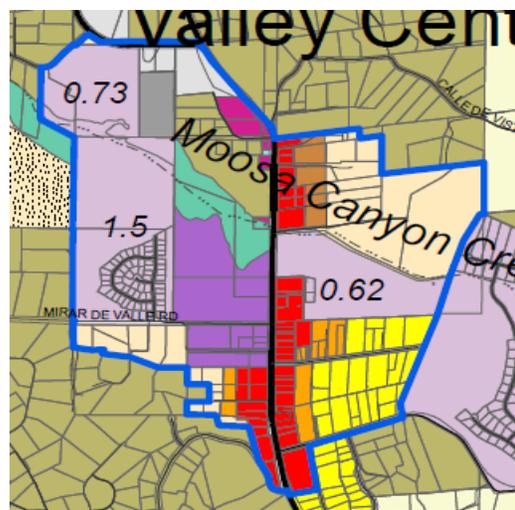
circumstances merged to reinvigorate Village planning in this area. They are: construction of the Woods Valley Ranch wastewater treatment facility in the South Village and its planned expansion; purchase by two cooperating developers of several hundred acres in the North Village and their plans for treatment and dispersal facilities in conjunction with the integrated pedestrian-oriented community they are planning; widening of Valley Center Road, a \$20,000,000 investment; the County’s adoption of “Smart Growth” principles in order to direct growth toward existing infrastructure to reduce costs of extending roads and urban services to increasingly remote countryside development.

The Valley Center community planners realized that the surest way to destroy the functioning ecosystem and natural scenic beauty which residents so treasure is to impose a checkerboard of homes and driveways uniformly across the Planning Area. Local shopping and services anticipated in the North and South Villages will also enrich the local economy, provide local jobs, and reduce trips out of town.

These factors combined to support the concentration of Commercial, Industrial, Mixed-Use and Village Residential development in these two compact Village areas. This requires extensive investment on the part of several developers in planning our Village areas, as well as the coordination of state grants totaling millions of dollars for the wastewater treatment systems to support this in-fill development. Valley Center property-owners/developers are actively implementing the community’s vision of two bustling Villages in the heart of our community.



VC North Village Plan



VC South Village Plan

With the exception of Valley Center Road, the mobility element network in Valley Center is comprised of relatively narrow, two-lane roadways. During the General Plan Update, an

east/west Mobility Element road was proposed to connect Highway 395 and Cole Grade. The western most road segment, Road 3A, was removed from the Mobility Element by the Board of Supervisors. The middle segment traversed through another proposed development, Lilac Ranch. Lilac Ranch was

purchased by Caltrans in October 2011 as mitigation property for the Highway 76 project and plans to keep the property undeveloped. It is unlikely that Road 3 will extend west of Lilac Road.

Concerns

Approval of these entitlements would sanction a huge up-zone. It would also require a change in the General Plan Regional Category and necessitate the revision of a number of General Plan Principles, Goals and Policies. This Project threatens to overturn virtually every element of the County's General Plan and Valley Center Community Plan – land use, mobility, conservation and open space, and safety. The Board of Supervisors approved a General Plan that already doubles Valley Center's population - from 19,000 to 38,000. Adding this Project clearly goes beyond General Plan Guiding Principle 1 to support a reasonable share of projected regional population growth.

The Project also violates Guiding Principle 3 – “Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities”. The Project ruins the qualities that make Valley Center and this part of North County the unique and special place that it is and is planned to be. Existing residents chose to live here and built their properties here expecting a semi-rural, agricultural use in mind. This Project effectively destroys the character of the Lilac Triangle neighborhood and infringes on the existing property owners' rights and quality of life.

The location and size of the Project are counter-productive to the regional vision of San Diego County. The Project location violates Guiding Principle 2 and General Plan Policy (Land Use) LU-1.2 Leapfrog Development. Leapfrog development is defined as Village densities located away from established Villages or outside established water and service boundaries. Leapfrog development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. Right-location is a pre-requisite for LEED certification. The location of this Project disqualifies it for LEED certification.

As discussed in the County's General Plan Introduction and Guiding Principle 7, the Project must also be analyzed in relation to the regional plan for compliance with AB 32 and SB 375. Residents from the Project will require extensive vehicle trips on a daily basis for work, education and meaningful shopping, thus adding greenhouse gas emissions to the San Diego region. The added traffic from the proposed

development for trips to and from Valley Center schools and community facilities will further tax the capacity of our local roads and Interstate 15 bringing them to unacceptable traffic volume much sooner than would otherwise occur. Scarce infrastructure dollars should be used to bring our existing road network up to safety standards, not subsidize a private development.

Guiding Principle 6 – “Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation. An effective transportation system should provide convenient access to employment, education, public service, commercial, and recreational centers. It should provide connectivity within each community and within the region.” The Project is not adjacent to any reasonably foreseeable public transportation; instead it’s another bedroom community near a freeway. The only connectivity provided is within its own property, moving Project residents around in cars because the three internal communities are too far apart to walk.

The project violates the Valley Center Community Plan by adding a third village, much more intense than the plan for completing our existing villages, destroying the countryside the community plan seeks to retain, and threatening the viability of Village development in the central valley where it has been planned. Several commercial components are part of this proposed Project, but little more than general locations within the Project area are available. However, if we assume that the bulk of businesses will be retail/office/service uses; this would be at cross-purposes to the approach taken by Valley Center in its community plan and the County’s General Plan. The commercial development proposed by this Project could potentially derail the planning that has gone into the Valley Center villages and the other North County communities. Our existing villages already have businesses, schools and infrastructure. Major developers are actively working with the county to attain the final entitlements. Market support for the extra commercial proposed by the Project is questionable.

The Project does not adhere to Guiding Principle 2 that says “new development should be located near existing and planned infrastructure to be served more efficiently”. Rather than increasing the efficiency of existing services, the Project adds to the existing burden for the county by having to duplicate services such as Sheriff, fire, schools, water, wastewater, and roads that are now being expanded in the existing village areas.

In addition, the Project is inconsistent with Guiding Principle 9 to “minimize public costs of infrastructure and services and correlate their timing with new development. Population growth impacts the cost to

build and operate essential public services. The development of housing, retail stores, and industrial jobs and services requires new roads, schools, parks, law enforcement, fire protection, and other public services. National studies indicate that a residential development does not pay for itself, requiring an estimated \$1.42 in public expenditures for every dollar it generates in tax revenues. In California, this deficit is even greater due to the limitations of Proposition 13. In addition, dispersed development patterns, common in unincorporated areas, are costly to serve because they require a more extensive road network for transportation and fire protection, law enforcement, and emergency services.”

The proposed Recycling and Waste Transfer Facility [RWTF] mentioned in the Project description is an industrial feature and activity that is out of character for much of Valley Center. Industrial infrastructure is provided for in the North and South Villages at the core of Valley Center, but like the dwelling unit density that it is intended to serve, the RWTF does not comport with the agricultural and estate residential uses of the Lilac Triangle. Likewise, the two proposed wastewater treatment plants, both temporary and permanent, have similar conflicts with the present Lilac Triangle neighborhoods. The location of both treatment facilities seem to conflict with the most environmentally sensitive areas of the Project.

Guiding Principle 5 – “Ensure the development accounts for physical constraints and natural hazards of the land.” The Project is proposed in an area that is characterized by uneven hills, slopes [many of them steep], ravines and valleys with wetlands and seasonal wetlands. While there is much information that has not been provided, one item that the subcommittee has received is the Project’s Preliminary Grading Plan. The grading plan says the Project will move (cut & fill) 4.4 million cubic yards of dirt. In order to understand what the tentative grading plan actually means Google search shows these facts regarding the construction of Hoover:

“There is enough concrete in Hoover Dam (4.5 million cubic yards) to build a two-lane road from Seattle, Washington, to Miami, Florida, or a four-foot-wide sidewalk around the Earth at the Equator.”

Such extensive grading in such rugged terrain is out of character for not just Valley Center, but for much of the region. This scale of grading will also encroach on, if not obliterate, five drainages, damaging or eliminating riparian habitat.

Guiding Principle 4 is to “promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance.” The open-space plan of the Project’s Implementing Tentative Map is troubling. Most of the “open-spaces” are too small and

too discontinuous to be of significant value to either native plants or animals. This compares unfavorably with most of the rest of Valley Center where, even though there is significant development, densities are such that most species are accommodated.

We dispute the contention in the Project Description that suggests the Project would be built in an area of distressed agriculture. More likely, the Project will create distressed agriculture on the parcels surrounding it. Guiding Principle 8 states - “Preserve agriculture as an integral component of the region’s economy, character, and open space network.” It continues to confirm that to preserve agriculture “by directing growth and development to areas in a way that protects opportunities for continued agricultural production.” There are several profitable agricultural activities in the Project area that would be negatively economically impacted by this Project. Additionally, this Project would remove from production many more than the 608 acres it would occupy as a result of restrictions on the use of common agricultural chemicals in areas surrounding schools as well as areas adjacent to housing. Surrounding agricultural and animal husbandry uses may also result in friction with the proposed high-density, urban neighborhoods where sensibilities for such activities may not be appreciated.

Conclusion

Since the Project was initially proposed, the Valley Center community has had three fundamental concerns about the Project.

1. Project Location

Extending sprawl, urban development into the northern, semi-rural, agricultural portions of the county is a regional growth concept that is part of the past. The region is actively planning and investing in developments that do a better job where the places and people already exist.

2. Project Size

The Project places a “city” the size of Del Mar in a rural area. This despite the fact that housing needs in Valley Center and the entire unincorporated county are more than met by housing planned in the recently adopted General Plan.

3. Project Density

A Project of this size is unprecedented for Valley Center and, in fact, North County. Recently

approved projects near the Highway 76 and Interstate 15 intersection were planned in the 1980s. Comparing this plan to that is like apples and oranges – time, politics, and land characteristics are all dramatically different.

The Project is inconsistent with the Valley Center Community Plan and violates each of the Guiding Principals of the San Diego County General Plan. Both plans were approved by the San Diego Board of Supervisors in 2011. Our conclusion is based on a review of the limited number of documents provided by DPLU and Accretive. We reserve the right to amend our comments as more documentation is shared with the community.