

Valley Center Community Planning Group

Minutes of the 9 July, 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 August 2012

Approved: 13 August 2012

1. Call to Order and Roll Call by Seat #:										7: PM				
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
P	P	P	P	A	P	P	P	P	A	P	P	P	P	P

Notes:

Quorum Established: 13 present

Pledge of Allegiance

2. Approval of Minutes:

Motion: Move to approve Minutes of 11 June, 2012 as corrected

Maker/Second: Rudolf/Jackson

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

3. Open Forum:

4. Discussion Items

4.a. Discussion of safety issues concerning the intersection of Vesper and Sunset Roads. (Davis)
Smith recuses himself based on proximity of his residence. Quinley takes chair. Davis presents Mobility SC discussion on subject intersection. He explains that SC couldn't deal with it at last meeting. SC will discuss at next meeting. Suggests that SC will forward recommendation To TAC. John Lallo, audience, expresses concern for safety based on high speed of motorists on Sunset. He is very concerned for pedestrians. He wants a posted speed limit sign at a reasonable speed. [The present speed for un-posted street is 55 mph]. Glavinic asks about time-of-day dependency of speeding. Hofler says state law requires CHP to post at 85% of average drivers' speed. Olympia McGee shares concerns for safety. She says drivers routinely achieve 60 mph in a very short distance along Sunset. Many incidents occur during school arrival hours. Mark Dague, comments that the speed limit is not the issue. Rather, his concern is pedestrians/bicycles and impaired vision in conjunction with speed coming over the rise in the road. Davis asks about intersection control at Vesper and Sunset. Dague says a fence impairs a driver's sightline from eastbound Vesper looking north on Sunset. Steve Gardner, resident, says he seldom sees CHP or Sheriff. He prefers not to walk on the street, too dangerous. Dave Ross adds that Roadrunner had a story on Sunset road that related similar concern. Davis says that was Fruitvale not Sunset. Glavinic advises that serious accidents and deaths help to bring attention to such problem areas. Oliver Smith relates personal story about dog killed by speeding driver on Sunset Road to illustrate point. Kathy Ames, resident, relates how drivers use excessive speed on Sunset especially over dips and rises in road. Quinley advises attendance at next Mobility SC.

4.b. Discussion and vote on motion to commend and thank Sandy Smith for her outstanding service to VCCPG as she relocates to Sacramento [continued from June 11, 2012 meeting]. [Quinley]
Quinley suggests a letter of thanks be sent to Sandy Smith for all her service to the community as a member and chair of the VCCPG and her extensive work on subcommittees and other boards. Rudolf suggests that VCCPG send letter to BOS regarding Sandy and ask that they compose a letter of thanks to Sandy on behalf of the county.

Motion: Move to request a letter of commendation and thanks for the considerable community service of Sandy Smith from the Board of Supervisors

	Maker/Second: Glavinic/Rudolf							Carries/Fails Y-N-A: 13-0-0 Voice						
5.	Action Items:													
5.a.	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: Hutchison reviews the desire to change the name of the SC to reflect the changed name of the project. He introduces the recommendation by the SC to appoint Paul Herigstad and Michael Karp to fill vacancies created by the resignations of Sandy Smith and Lael Montgomery.														
Motion: Move to change the name of the I-15/395 Master Planned Community SC to Lilac Hills Ranch SC and appoint Michael Karp and Paul Herigstad to the two vacant seats on that SC														
Maker/Second: Hutchison/Hofler							Carries/Fails [Y-N-A]: 12-0-1 Jackson recuses							
Notes: Jackson recuses because he lives in proximity to the project.														
5.b.	Discussion and vote on recommendations regarding the Specific Plan Text document submitted by Lilac Hills Ranch and prepared by the Lilac Hills Ranch Hills subcommittee. (Hutchison)													
Discussion: Hutchison reviews the comments to the Accretive Specific Plan prepared by the SC [attached]. Rudolf explains that, from his experience, Specific Plans are typically much more detailed than that submitted by Accretive Investments, Inc. He commends the work of the SC. Glavinic agrees with Hutchison's presentation that much is missing in the specific plan. Smith says we have fulfilled the requirements of the County to review the series of documents submitted. The County acknowledges the review limitations. Vick suggests a word change under General Concerns. David Ross, Roadrunner, asks about the specific plan and why it was delayed for release. Ross asks about the County's scoping letter and asks for a copy for the Roadrunner.														
Motion: Move to approve the comments of the subcommittee and forward them to County as those of the Planning Group as amended														
Maker/Second: Rudolf/ Vick							Carries/Fails (Y-N-A): 12-0-1 Jackson recuses							
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	Y	Y		Y	Y	Y	Y		Y	R	Y	Y	Y
Notes: Jackson recuses because of his property proximity														
5.c.	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. (Rudolf)													
Discussion: Rudolf briefly reviews the need to rename the General Plan Update [GPU] Subcommittee to Community Plan Update Subcommittee. With the GPU approved by the BOS last August, the present need is to finalize the Valley Center Community Plan which is integral to the already adopted General Plan. Rudolf asks that the mission statement for the renamed SC be changed to reflect the new direction of the SC.														
Motion: Move to change the name of the GPU SC to "Community Plan Update Subcommittee" and restate the mission of the SC to be: "Prepare the draft revision of the Valley Center Community Plan to implement and augment the new County General Plan."														
Maker/Second: Rudolf/Quinley							Carries/Fails [Y-N-A] 13-0-0 Voice							
5.d.	Discussion and vote on report and recommendation on local public road network prepared by the Mobility Subcommittee (Davis)													
Discussion: Davis presents. Outlines work of Mobility SC including Local Public Road [LPR] network, Community Evacuation Route Study [CERS], etc. He speaks to the prioritization of roads within the LPR network and says he will present the outcome at the next meeting. No motion														
5.e	Discussion and vote in support of an informal meeting being requested by Supervisor Bill Horn's office for local planning groups and tribes to discuss common local roads and circulation issues of the area. (Smith)													
Discussion: Smith presents. He speaks to a conversation with Supervisor Horn's office that indicated that the supervisor doesn't support a meeting of local planning groups and tribes to discuss common local roads and circulation issues of the														

area at this time. Smith did attend a recent meeting of several Indian tribes where ideas were exchanged. In the short term, each planning group should come up with needs for evacuation routes, roads etc., then chairs will compare needs and look for common ground. Once it is possible to get the planning groups and tribes together with specific ideas and issues, they can meet with Supervisor Horn and others to resolve the issues. Valley Center has already done much work with CERS and the LPR network. Smith adds that widening Valley Center Road at the bottom of the grade in Escondido will cost \$15 million. The County has made it a priority to have a 4-lane road from Valley Center to I-15. Tom Bumgardner, audience, says the Bear Valley Parkway widening project between Hwy 78 and Boyle Ave. is being done by the County and then will be handed back to the City of Escondido. He says Valley Center's road funds are being used to accomplish this widening. Smith responds that we cannot stop progress but we can influence and help direct it. Jim Quisquis says he is now an official liaison of the San Pasqual Tribe to planning groups. He offers his help as liaison in this issue. Smith says at the Pala/Pauma Planning Group their SC adopted 'Tribal Liaison' SC title. Glavinic then adds that roads are a regional problem. He says the San Diego Association of Governments [SANDAG] suggested widening Hwy. 76 to four lanes, but it didn't consult the tribes. He says SANDAG will determine where money will be spent.

Motion: Move to support the Chair in establishing an informal meeting of local planning groups and tribes to discuss common local road and circulation issues.

Maker/Second: Smith/Glavinic

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

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 - Smith, Chair
7.	Correspondence Received for 9 July 2012 Agenda:
a)	San Diego County Planning Commission to VCCPG; Final Agenda, San Diego County Planning Commission for meeting on June 8, 2012 at 9:00 AM, 5201 Ruffin Road, Suit B, San Diego, CA.
b)	San Diego Chapter of American Society of Landscape Architects to VCCPG, public announcement of \$5,000 Grant Award for which community groups are invited to apply to make landscape improvement to their neighborhoods. All non-profit community groups recognized by the IRS located in San Diego County, which have been in existence as a non-profit group for at least three years, are eligible to receive the grant. For more information contact Nate Magnusson at nmagnusson@schmodtdesign.com .
c)	DPLU to VCCPG; Notice of Public Review of Draft Habitat Loss Permit for Log No. 08-01-008 Miller Road Plaza; Site Plan 08-003. The project is a 3 building retail shopping center consisting of office, retail and restaurant space as well as a gas station located at the intersection of Valley Center Road and Miller Road on approximately 6.70 acre site. Comments on the draft Habitat Loss Permit approval must be received no later than August 6, 2012 at 4:00 p.m. The project will impact 2.20 acres of coastal sage chaparral scrub and .07 acres of flat topped buckwheat. No sensitive wildlife or sensitive plant species were identified onsite. DPLU planner is Kristina Jeffers at (858) 694-2604; Owner is Valley Center View Properties at (619) 523-0133. (Quinley)
d)	DPLU to VCCPG; Notice of Preparation of an Environmental Impact Report; Lilac Hills Ranch Master Planned Community; 3800 12-001 (GPA), 3810 12-001 (SP); 3100 5571 TM ; 3100 5572 TM , 3600 12-003 (REZ), 3300 12-005 (MUP), 3940 12-001 (VAC), Log No 3910 12-02 003. The Lilac Hills Ranch project is a proposed Master Planned Community. The proposal is for 1,746 dwellings units including multi-family, commercial, parks, trails, a school, age restricted community, waste recycling and collection facility and other associated uses. The 608-acre project is located south and west of West Lilac Road, generally east of Old Highway 396 and north of Mountain Ridge Road. (Hutchison)
e)	DPLU to VCCPG; Hill Top Winery, AD Small Winery; 3000-12-017 (AD12-017), owner is Mike Schimpf at mschimpf@michaelschimpf.com ; project address is 30655 Valley Center Road and Molly Anne Court, This project seeks an Administrative Permit for a small winery including a proposed 1500 sq ft wine tasking and sales building with 6 parking spaces and a proposed 8050 square foot wine making building with 26 parking spaces, all on existing 21.8

	acre Ranch. Project is accessed by a dedicated easement. (Franck)	
f)	San Diego County Department of Parks and Recreation to Oliver Smith; Annual update of a five year park project priority list for Valley Center for the expenditure of Park Land Dedication Ordinance (PLDO) funds and a recreation programming list. (Smith)	
g)	Registrar of Voters to VCCPG; Requirements for candidates' statements, legal publication and statements of economic interest. (Smith)	
8.	Motion to Adjourn:	8.32pm
	Maker/Second: Smith/Quinley	Carries/Fails (Y-N-A): 13-0-0
Note: Next regular meeting scheduled for 13 August 2012		

Appended material for item 5.b.:

**Comments on the Lilac Hills Ranch Project Specific Plan Text and Figures
7/9/2012**

To: Mark Slovick, Project Manager
From: Valley Center Community Planning Group
Re: I-15/395 Master Planned Community MPA [Lilac Hills Ranch]
3810-12-001 (SP12-001) [the Project]

On June 5, 2012, the Valley Center Community Planning Group [VCCPG] received the Specific Plan for the referenced Project. We received the Specific Plan document as we were finalizing comments on several documents released May 3, 2012. Those comments on the initially released documents are contained in our previous letter to you dated June 11,2012. In those initial comments, we noted the absence of the Specific Plan, the General Plan Amendment Report and the collection of technical reports relevant to this Project and the impossibility of making a meaningful and comprehensive evaluation of the Project without them. In this letter, we will add our comments on the Specific Plan to those already made about the tentative maps, grading plan, landscape concept plan and temporary sewer treatment facility plan in our previous letter. We still regard the documents presently released for review to be incomplete and not sufficient for a complete and adequate review or analysis of the Project. We continue to reserve the right to make additional comments as more documentation is released to the community. This letter and the letter dated June 11,2012 should not be construed as our “one bite of the apple”.

The General Plan Amendment Report, which is referenced in the Specific Plan, remains integral to our analysis and continues to be unavailable to us. We expect that the General Plan Amendment Report, if it is to accommodate this Project, will necessarily overturn several of the

guiding principles of the General Plan adopted in August 2011 as well as the Valley Center Community Plan and the SANDAG Regional Transit program for 2050.

Since receiving the Specific Plan for the Project, Program Manager Mark Slovick released to the public a scoping letter, which is the County's response to the submissions made by Accretive Investments, Inc. for the Project. We found that scoping letter to be thorough and comprehensive. And, we concur with the findings contained in that letter regarding the quality and completeness of the Specific Plan.

Concerns

General Concerns

The Specific Plan does not meet the requirements for a Specific Plan, as the County Staff has evaluated in Major Project Issue #2 in the 6-14-2012 Scoping Letter. The 199 comments on the Specific Plan speak loudly to the lack of accuracy and completeness of the Specific Plan.

Our mutual, independent assessment is that this urban high-density project is being proposed in a rural, agricultural area without adequate infrastructure.

The Specific Plan fails to provide adequately detailed information on:

1. The distribution, location, and extent of the uses of land, including open space within the project.
2. The proposed distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the Project and needed to support the land uses described in the Specific Plan.
3. Standards and criteria by which development will proceed, and standards for the conservation, development and utilization of natural resources.
4. Specific implementation measures including regulations, programs, public works projects, and financing measures necessary to implement the items in paragraphs 1, 2, & 3.

And, importantly, the Specific Plan does not provide a statement of the relationship of the Specific Plan to the General Plan that discusses the consistency between both plans and

provides a comparison of goals, objectives, and policies. It merely references the proposed General Plan Amendment Report, which is not available to us.

As was noted in our earlier comments on the initial release of documents, the Lilac Hills Ranch Project is inconsistent with the Valley Center Community Plan and violates each of the Guiding Principles of the San Diego County General Plan. Both plans were approved by the San Diego County Board of Supervisors in 2011. Nothing in the Specific Plan for this Project has mitigated the overriding fact that a project of this size, with such an urban density and character does not fit into a rural, agricultural area like the Lilac Triangle. It would require the installation of much infrastructure and will have a deleterious effect on the Valley Center Community and the North County Region, along with the existing/on-site and neighboring agriculture and severely impacts the economic viability of agriculture in the area.. Such a development would transform that area, destroying the lives of those property owners that surround this project.

SPECIFIC CONCERNS

I – Introduction

The Specific Plan’s “Community Concept,” which is apparently intended as a Project description, uses inappropriately romantic language to inadequately describe the Project. And, the Environmental Resources subsection of the Community Concept presents a vague description of on-site cultural resources and available water infrastructure. These representations are not nearly detailed enough to meet the minimum standards of a Specific Plan as defined in Section 65451 of the Government Code.

II – Specific Plan Summary

As noted in our comments of 11 June 2012, the overall size and scale of this Project are misplaced in the Valley Center community plan area. This Project would radically alter the rural, agricultural character of northwestern Valley Center and neighboring Bonsall. Taken together with other projects proposed and in process along the I-15 corridor, this Project would have an adverse impact on the region. The density and layout of the Project are completely out of character with the Lilac Triangle and the larger Valley Center and North County regions. The Project would also significantly adversely impact the four properties surrounded by the project as well as those residences that border the project.

Specific Plan Goals and Policies

The project both goes against the practicality and the spirit of the recently updated County General Plan as well as the Valley Center Community Plan which call for projects of this density to be placed in specific areas, such as the Valley Center North and South Villages. Although the Specific Plan claims to limit Project development to the uses permitted by the County Zoning Ordinance, the County General Plan and the Valley Center Community Plan, it proposes to abandon each of those as they are currently in effect to achieve a more urban, less rural Project. This Project will not blend with the surrounding Lilac Triangle agricultural and residential properties, it will detract from them, making current and future agricultural uses less viable. In terms of density and architectural design, this Project is out of character with Valley Center and the larger region.

The Project misrepresents “Smart Growth”. This Project is proposed in a green field area with minimal infrastructure for power, water, sewage, solid waste, transportation, schools, law enforcement, and fire protection. Smart Growth principles require that growth be directed to areas with that infrastructure in place or, at least, more readily available. The County is trying to preserve rural agricultural areas, not urbanize them.

Open Space and Recreation Plan

As previously identified, the open space areas set aside in the Specific Plan are narrow and discontinuous, making them only marginally useful to wildlife. The goal of limiting disturbance to only those areas identified in the Specific Plan is rendered dubious when considering the plan to move 4.4 million cubic yards of earth over the entire project area. Mitigation for development impacts is ambiguously planned off-site, preferably near the MSCP PAMA, and/or on-site in restoration programs. Mitigation off-site may not benefit the Lilac Triangle, which will sustain the entire disturbance to be mitigated. The plan to allow infrastructure, facility and trail uses in the biological open spaces is problematic. Biological open space should not be available for such disturbances which are antithetical to the reason for the creation of biological open spaces.

The developer should be required to dedicate all biological open spaces, both those included in the Specific Plan and those required in addition subsequent to the review and finalization of the Specific Plan at the onset of the first phase of development.

On-site trails, both public and private, should be required to allow multiple uses, such as horseback riding, hiking, and biking to be consistent with trail guidelines being applied in the Valley Center Planning Area. Further, the public trails should conform to minimum path widths set out in the County Master Trail Plan and the Valley Center Community Right-of-Way Standards. Distinguishing public and private trails within the Project does not advance the goal of an integrated trail network within the planning area, the region or the county as a whole. We suggest that the developer consider making all trails in the Project public trails and that they conform to the standards being applied in the entire planning area.

We recommend that the Valley Center Parks and Recreation District and not the County Parks Department should determine amenities appropriate to serve the residents of the Valley Center Planning Area. The developer should work with the agencies the community has established rather than fragment responsibilities among multiple agencies within the planning area.

Circulation

Figure 15 identifies the existing West Lilac Road, the proposed new West Lilac Road and the new Lilac Hills Ranch Road. However, it fails to address any other roads within the Project including a southern connection from the Project to Circle R Road. A Specific Plan should include all such infrastructure with both description and diagrams. The same figure 15 shows Lilac Hills Road crossing outside the Project boundary at its southern end without explanation of how right of way is granted. The trail segment associated with Lilac Hills Ranch Road is identified as an 8-foot wide path that does not conform to community standards.

Under Circulation Policies, the Specific Plan says “additional emergency access points will be provided (that may be controlled limited access points) that will improve the efficiency of the existing roadway network during emergencies.” None of those access points are indicated on Figure 15 or any other figure. Under what terms are these access points controlled and limited? How can they serve as emergency exits if they are controlled and limited? Further, the local residential roads called out under “Streets” are not illustrated on either Figure 15 or Figure 16.

The Specific Plan does not address the locations or types of off-site street intersection improvements and how they will be financed. There is a suggestion that the developer will contribute “a fair share of the cost for offsite intersection improvements,” but, very little specificity about where or what.

The Traffic Impact Study is not available, so no reasonable comment can be made. However, given the ambiguity expressed in the Specific Plan regarding which school district will be used by students within the Project, the study should include the roads of the entire Valley Center Planning Area as well as those portions of the Bonsall Planning Area and Fallbrook Planning Areas that conceivably could carry school related traffic

In general, the developer should note that Valley Center has an approved community right of way design standard [BOS Policy J36] that must guide all public road design. The Valley Center standard is more specific than the default County mobility element standard.

Fire Protection/Law Enforcement Plans

The Fire Protection and Emergency Medical Services segment of the Specific plan has incorrectly calculated response times from CalFire’s seasonally operated Miller station which is equipped with brush trucks, not structure trucks. The other nearest station with appropriate equipment [Circle R/ Old 395] is more than the prescribed distance away.

The Specific Plan mentions a Fire Protection Plan [FPP] but is not clear if this is an additional technical document or merely a designation for the two segments of the Specific Plan headed Fire Protection [pages II-17, III-42]. The Fire Protection segments within the Specific Plan do not address how the fuel management zones will interact with open spaces that are to be left with natural vegetation. The fuel management zones should extend away from the open spaces identified and not encroach on the open spaces. Also, the ‘Zone A’ fuel management zone is ambiguously described as either 100 feet or 50 feet. Further, given that the water reclamation facility is not shown in any detail on any of the figures, it is unclear why it should be exempted from fuel modification requirements that apply to all other structures, especially considering its importance to the urban development proposed.

From what we have learned from the Deer Springs Fire Protection District, they do not expect to adequately serve the proposed Project in the next five years. The Project will also stretch law enforcement resources, even more than they are presently stretched, by causing additional deployment to a distant density node.

Infrastructure/Public Facilities Plan

The infrastructure and public facilities plan does not offer accurate or complete plans for the implementation or financing of water and waste water facilities. The phasing of the development may make it difficult to finance construction and operate the proposed facilities. Further, the Specific Plan does not address the impact on wells outside the project area.

Other proposed public and semi-public facilities include a recycling and waste transfer facility and a water reclamation facility. While both facilities may be desirable or required by a large-scale development, these kinds of facilities and the densities they are designed to accommodate are out of scale for the Lilac Triangle area and out of character with the surrounding agricultural and residential uses. Further, the Specific Plan is not specific about which of the several alternatives outlined for water reclamation is being pursued [onsite water reclamation facility, expansion of Lower Moosa Canyon Water Reclamation Facility, or a combination of the previous two in conjunction with a gray water system for single family houses].

The mention of a solar facility in the Specific Plan is presented as more of an option than a planned facility. The Specific Plan should be definitive in regard to such facilities, not ambiguous. While solar technology is still advancing, enough is known now to allow the developer to make a judgment as to whether it should be part of the Project. This type and size of industrial development [an area of 40 acres is identified for this Project] has already stirred concern among residents near the North Village and would likely raise similar concern in the Lilac Triangle.

The Specific Plan does not adequately specify the location of the proposed K-8 school, providing two alternative locations in different districts and no specific plan for which alternative will be built.

III – Development Standards and Regulations

Public/Private Streets

The Lilac Hills Ranch project proposes to add 1,746 homes, or approximately 5,000+ people, to a community that has already planned to accept a population of 17,528 and to build two centrally located villages to accommodate population growth. Lilac Hills Ranch thereby makes a substantial impact on all of the resources within Valley Center. One of the most important impacts will be on the roadways.

At this point it is difficult to assess the impact of the Accretive plan on Valley Center roads because of the incomplete manner in which the Specific Plan presents information about roadways in and around the project and because of the lack of consideration of traffic impacts created by the project on the existing roadways, such as Old Highway 395 and Interstate 15. The traffic impact study is still to be completed; the Environmental Impact Report has not yet been begun. Yet it seems impossible that the addition of such a large, dense, inappropriately situated development will not have a major impact on local roads.

The Mobility Element of the San Diego General Plans says,

“The Mobility Element balances competing goals of accommodating trips generated by land use, while striving to retain a transportation network that complements rather than impacts, the character of communities which is generally rural in much of the unincorporated County. Therefore, widening of roads, which can dramatically change the character of a community, should be pursued only after environmental and community character impacts are also considered.”

It is clear that Lilac Hills will not conform to this requirement of the general plan.

The Lilac Hills Ranch Specific Plan indicates, for example, that “Regional access to Lilac Hills Ranch is from West Lilac Road...West Lilac Road Leads directly west to the Walter F. Maxwell Memorial bridge over I-15 with access to the freeway both north and south and to State Route 76 heading west and east.”

It seems likely that the drafter of the specific plan document meant to indicate that this describes the ease with which I-15 and Route 76 can be accessed.

The Maxwell Memorial Bridge is a two-lane bridge, which seems unlikely to be able to carry the additional traffic created by the development. Widening it would be prohibitively expensive and would destroy the beauty and classic lines of the structure. This disproportionate impact will be repeated many times distorting the road structure in Valley Center's west end if this project is ever built.

Likewise, there is no consideration in the specific plan text of the impact that Lilac Hills Ranch will have outside of the immediate vicinity of the development and on the circulation plan of the Valley City Community. Even if there is an elementary school built within the Lilac Hills Ranch development, there will not be either middle or a high school which means that families will have to make two trips each weekday to deliver children to schools deep in Valley Center and/or Bonsall and Fallbrook. The impact that this will have on Valley Center roads is substantial. There is no indication in the Specific Plan Text that the project will pay for enhancement of roads, beyond the development itself, to carry the traffic that it generates. The General Plan's Mobility element requires development "to pay fair share of road and related infrastructure costs" in order to "minimize public costs while ensuring the infrastructure is available to support the increased demand for services"

The Scoping letter likewise requires the applicant to "provide suitable evidence that off-site improvements...can be accomplished without resorting to the County of San Diego for assistance."

In contrast, the two Villages (North and South Villages) planned for construction in the heart of Valley Center avoid most of these road structure issues. They are close to schools and parks, will be served by the already constructed (and costly) Valley Center Road, and will allow families to easily shop for food and other necessities and take children to schools without making long trips. They meet the requirement of AB 32 by creating compact, in-fill communities and reducing vehicle trips. Lilac Hills Ranch is a leap-frog development.

DPLU notes in their scoping letter that "the Public and Private Road System sections will need to be revised based on the comments from the Deer Springs

Fire Protection District, County Fire Marshall and Department of Public Works” which is further indication of the incomplete nature of the material before the Valley Center Community Planning Group. This section of the scoping letter also alludes to the relationship between fire danger, the road network and Lilac Hills Ranch.

The scoping letter indicates that the project is not within the maximum allowed emergency response time of 5 minutes required by the General Plan. The development’s fire protection Plan incorrectly calculates the response time from the Miller Fire Station (which is not a year round fire station) but more importantly, the correct fire station from which to calculate fire response time is the Deer Springs Station 1, which has an 8 minute travel time to the center of the project. Travel time was calculated by assessing the project from the south even though the first phase of Lilac Hills Ranch planned for construction does not include an access road to the south.

Roads, travel time and fire protection are critical in evaluating the viability of a huge project located at the site selected by Lilac Hills Ranch. In the event of a major fire in Valley Center and a need for community evacuation, Lilac Hills Ranch will act like a cork in a wine bottle. Its thousands of residents will require evacuation as well. Given their location, they will clog the roads impeding movement and evacuation of residents who live in more central areas of Valley Center. Travel time for fire responders is a critical issue and is closely related to the road network.

A similar issue involves the fact that the project exceeds the maximum allowed dead-end road length of 800 feet for parcels zoned less than 1 acre (as most residential construction in Lilac Ranch is.) Additional roads and reconstruction of planned roadways must be required to ensure the safety of Lilac Hills Ranch residents.

A third example of roads and fire danger involves the design of the project in such a way that streets on the subdivision boundary terminate in a cul-de-sac in violation of the subdivision ordinance. Lilac Hills Ranch Road, a new public road planned for construction by Accretive does in fact end in a cul-de-sac at the entrance to the development. The draft Specific Plan also

indicates an arrow at the bottom of the southern boundary of the site but does not indicate access to that point or where it would connect to the road network. These issues, pointed out in the scoping letter, are important aspects of the road network within the project as it applies to fire protection.

Even if these issues could be resolved, both the Valley Center Municipal Water District and Deep Springs Fire Protection District indicate that the facilities to serve the project are not reasonably expected to be available within the next five years. Approval of this extremely large “bottleneck” project should not be considered until after facilities to protect its residents—and by extension the rest of the community—are in place and their adequacy can be assessed. Needless to say, the Valley Center Community Planning Group will be interested in seeing and commenting on the adequacy of road plans and on the relationship between fire and roads if further iterations of the project are offered and as the Traffic Study and Environmental Impact Report are prepared.

Architectural Design Standards and Guidelines

The Specific Plan does not clarify the number of units that will be in the limited access senior citizen village nor does it indicate how many beds would be established in the group care and assisted living facility that may be a part of the senior citizen village. It is not clear whether the group-care facility, where individual client rooms lack kitchens, is counted as part of the 1746 dwelling units for the entire project and at what rate or equivalency it would be counted. This metric would have a significant impact on the size of the facility.

Since none of the proposed structures are indicated on the available tentative maps, and since much of the ‘standards’ language is indefinite, and reduced to suggestions, it is very difficult to meaningfully comment on this ‘specific’ plan.

Grading Plan Development Standards

The Valley Center Planning Group has commented before on the Lilac Hills Ranch Preliminary Grading Plan, which proposes to move (cut and fill) 4,400,000 cubic yards of dirt. The Lilac Hills Ranch subcommittee determined that on their 608-acre development Accretive would move enough dirt to build a four-foot wide sidewalk around the Earth at the Equator.

A grading plan of this magnitude would seem to violate many aspects of the San Diego County Plan including COS 11.1, which requires Protection of Scenic Resources that include significant scenic vistas, prominent ridgelines, dominate landforms and scenic landscapes. A landscape so aggressively reshaped cannot help but destroy habitat for most of the life forms located on the 608 acres, which renders the idea that “conservation areas” will be created almost laughable. If habitat is devastated, it will be difficult to impossible for animals (and plants) to survive the devastation. As the EIR requirements are formulated, the impact of such a massive amount of grading and essentially reshaping a section of the earth should receive prominent attention.

Regarding prehistoric remains, the Specific Plan calls for a qualified archeological grading monitor to be on-site during grading activities only in specific areas. It seems that grading over the entire site should be monitored if grading is expected to reveal cultural artifacts. Presumably, archeologists will have evaluated the significance of known cultural sites in advance. Any items revealed by grading could occur in unknown sites as well. Also, no mention is made of the presence of representatives of local Indian tribes for whom the known sites may have particular significance.

There seems to be an awkward duplication of language within the sections headed ‘H. GRADING PLAN DEVELOPMENT STANDARDS’ and ‘7. Grading Plan Development Standards’.

Drainage Plan Development Standards

Again, much of the language in this section appears to be boilerplate and only minimally adapted to the Project. There is surprisingly no discussion of drainage standards and their impact on the wetlands identified as the principal natural drainages from the Project. What mitigations are anticipated to deal with the transformation of natural drainages from seasonal runoff to year-round runoff from irrigation? What impacts will that have on the assemblage of plant and animal species that pre-existed in those drainages?

Water and Wastewater Development Standards

The Specific Plan seems to specifically rely on the County Departments of Public Works, Health, and Environmental Health as well as the California Department of Public Health to establish the specifications, requirements, and design of the water and wastewater systems. The developer bears some responsibility for the design of these systems, and those design ideas must be presented in the Specific Plan. We understand that the Project must comply with the regulations established by these agencies, but the system design should reasonably appear in the Specific Plan and should appear in some detail according to the requirements of Specific Plans.

Open Space Maintenance Standards

The HOA Maintenance standard provides that should the HOA decide to redesign common features such as landscaping, fencing, trails, monuments, or others, they shall be in accordance with the Specific plan. We recommend that any such modifications should be taken by the HOA to the Valley Center Design Review Board for review and approval before implementation.

The biologically sensitive areas identified in the EIR are to be placed into open space easements and managed by qualified and licensed professionals according to the Lilac Hills Ranch Resource Management Plan. Under 'GENERAL USE AND PERFORMANCE STANDARDS' [page III-47] biological open space will be dedicated to and maintained by the County of San Diego. Presumably this is consistent with the Lilac Hills Ranch Resource Management Plan. However, the Lilac Hills Ranch Resource Management Plan does not appear as part of the Specific Plan. It is not listed in the table of contents. We expect this plan to be released along with the other unreleased technical studies still being reviewed by the County. Until that plan can be reviewed, reasonable comments cannot be made.

Under the section 'GENERAL USE AND PERFORMANCE STANDARDS' [page III-48], 'New' West Lilac Road and Lilac Hills Ranch Road, curbs and asphalt, are to be developed as public streets and maintained by the County of San Diego. It must be remembered that all public roads within the Valley Center Planning Area should conform to the VC Community Rights-of-Way Standards.

The section 'GENERAL USE AND PERFORMANCE STANDARDS' [page III-48], provides for restrictions on the sales of stable gear, and poultry management [and the structures that support it]. These provisions seem antithetical to the character of Valley Center. In fact, the Project has

chosen the most restrictive zoning limits for domestic animals available in the county. Horseback riding and animal husbandry are essential characteristics of Valley Center. To so severely limit their availability in this Project is an unreasonable taking of an important part of country living.

Regarding commercial uses in the Project, our view has not changed from our previous comments. The Valley Center Community Plan calls for commercial uses to be focused on the North and South Villages along Valley Center Road. Creating additional commercial nodes in the Lilac Triangle will confound the community plan. In addition, the proposed commercial uses would not fully and adequately serve the proposed development's residents or current residents of the surrounding area in a way that significantly reduces average daily trips.

The Specific Plan fails to identify how the density within the Project will be apportioned among the various residential planning areas. In fact, it states under 'Single Family Residential Areas' [page III-50] that units, both single-family and multi-family, may be transferred from any residential neighborhood to another. This is inappropriate in a Specific Plan, and represents no plan at all.

Under "Open Space and Trails [pages III-52 & 53], allowable uses for biological open space include public utilities, access to utilities, and emergency or special needs fuel modification. All of these uses diminish the value of the open space to natural vegetation and wildlife, which are presumably the beneficiaries of the open space. It seems disingenuous to provide open space for wildlife corridors and natural vegetation and then offer them up as space for utility placement and access, solar development or fuel modification.

IV – Implementation

In general, 'Section IV – Implementation' of the Specific Plan seems to consist of mostly boilerplate text that describes what could or should be done, but does not specifically describe what would be done if the Project is approved. This is consistent with the pattern for the entire Specific Plan, lack of specificity.

Community Phasing

There seems to be a conflict between the 16 areas on the preliminary grading plan and the 12 identified phases shown on the Community Phasing diagram. Phasing of the grading for the entire Project should be specified. The criteria to be used to determine the thresholds for adding infrastructure as each phase is successively built should also be specified. There is no indication that County monitors will be sampling traffic data, water recycling data, etc. that will determine that additional infrastructure is needed. The Specific Plan should specify the phasing aspects of the Project in more detail.

And, it is noted that the table that shows the phasing of roadway improvements is not included nor is the Traffic Impact Analysis since both are tied to the still unfinished traffic study. These omissions make useful comments impossible.

Subsequent Actions

There is a distinct lack of information on agreements and improvement plans that will need to be arranged with agencies and neighboring properties. These include, but are not limited to fire protection, water supply, road rights-of-way, water reclamation, public trails, parks and off-site road improvements. Much of the required information, plans and permits are still pending. It is inappropriate that the presently released documents would include the essentially complete landscaping plan, which is of tertiary importance at this stage of review, but fail to include other essential plans and documents that have a direct bearing on the feasibility of the entire Project.

Site Plans

Among the missing items in this section are several summaries of technical reports and any requirements they may make on the Project. These presumably are among those technical reports that have not been released to the public for review.

Public Facilities – Financing Plan

Much of this segment of the Specific Plan identifies requirements that must be met and, in some cases, several options that might be employed to meet them but often does not specify the direction the Project will go. This is a recurring theme in this Specific Plan.

Among the applicant's nine proposed financing alternatives for the required infrastructure some would have others – the County and/or other area landowners – either indemnify the debt financing or partially absorb Accretive's development impact cost . County Staff concurs with this assessment in Major Project Issue # 14 – Financing, but uses far kinder language than is warranted. More specificity is needed to make reasoned comments.

CONCLUSION

As a concluding note in the continuing evaluation of the Lilac Hills Ranch project, it seems appropriate to quote from the latest DPLU Scoping Letter:

“As indicated in the Major Pre-Application Letter, the overall size and scale of the proposed development (1,746 dwelling units, commercial and civil use types) is a major project issue. The proposed development of the Lilac Hills Ranch project would substantially increase the size of northwestern Valley Center and Bonsall and change the character of this rural agricultural community. In addition, the Environmental Impact Report (EIR) will need to analyze the cumulative impact of the project on the rural character of the area when combined with other reasonably foreseeable projects within the region. The predominance of small lot development, as well as the uniformity of lot sizes within the development area would not be consistent with rural development patterns within the Valley Center Community Plan area. The EIR should also analyze the project's impact on neighboring residences, especially those surrounded by the site or directly adjacent to the project site.”

We believe that the range of issues that must be resolved prior to serious consideration of this project is indeed enormous. These issues must be resolved to community satisfaction.