

# Valley Center Community Planning Group

## Minutes of the March 11, 2013 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 BOS=Board of Supervisors DPDS=Department of Planning and Development Services N=Nay P=Present R=Recuse  
SC=Subcommittee TBD=To Be Determined VC=Valley Center VCCPG=Valley Center Community Planning Group Y=Yea

Forwarded to Members: 5 April 2013

Approved: 8 April 2013

<b>A</b>		<b>Call to Order and Roll Call by Seat #:</b>								7:02 PM				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
L A V E N T U R E	H U T C H I S O N	E V A N S	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	B O B  D A V I S	B R E T  D A V I S
P	P	P	P	P	P	P	A	P	P	P	P	P	P	P

**Notes: Britsch arrives 7.08 pm**

**Quorum Established: 13 present**

<b>B</b>	<b>Pledge of Allegiance</b>
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<b>C</b>	<b>Approval of Minutes:</b>
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**Motion:** Move to approve the minutes of 11 February 2013 as corrected

**Maker/Second:** Glavinic/Rudolf

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

<b>D</b>	<b>Open Forum:</b>
	None

<b>E</b>	<b>Action Items [VCCPG advisory vote may be taken on the following items]:</b>
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<b>E1</b>	<b>Report, discussion and vote on the Harrah's Rincon Casino Expansion's Final Environmental Evaluation (FEE) per a request from the County for input on the FEE before the County's negotiation with Rincon. (Glavinic/ Davis)</b>
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**Discussion:** Davis presents. He notes the joint meeting of the Tribal Liaison and Mobility SCs regarding road issues of interest to Valley Center and local Indian tribes. He says there was no tribal participation in the meeting although an effort was made to encourage attendance. Glavinic supports motion saying it is a way to actually achieve improvements to the VC roads. Will help in evacuations. Davis says out of the \$425K from the San Pasqual tribe, the County staff spent \$100K on planning activities. He wants to avoid having this money burned up in overhead by the County. He wants to make short-term improvements as soon as possible for the community benefit. Smith notes a letter was sent to the County re Lilac/ Old Castle Roads. There has been no response from the County. Smith will give some more time for a response. After vote Smith speaks to improvements being made at Rincon and San Pasqual reservations.

**Motion:** Move that Casino expansion mitigation plans and funds should give top priority to expanding exit capacity at bottom of VC Road grade [approximately between Beven Dr. and just north of Lake Wohlford Rd.] to provide two lanes southbound going into Escondido to improve emergency exit capability. The subcommittee strongly recommends that priority be given to using the funds available for physical improvements that can be completed within the current fiscal year.

**Maker/Second:** Davis/Quinley

**Carries/Fails: [Y-N-A] 14-0-0 Voice**

<b>E2</b>	<b>Introduction of candidate(s), candidate(s) comments, discussion and possible vote to recommend one candidate as the VCCPG representative on the I-15 DRB. Candidates will have an opportunity to introduce themselves and speak. (Britsch)</b>
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**Discussion:** Britsch presents and introduces Michal Mahan. He has lived for 60-years in north San Diego County, been a Valley Center resident since 1974, and been a Valley Center landowner since 1972. He has a degree in planning and has work experience in planning. Norwood-Johnson asks where he lives [eastern

Valley Center]. Hutchison asks about his familiarity with the design guidelines. Norwood-Johnson asks about other applicants' interest. Britsch says others were contacted but did not provide information on time. The two previous candidates declined to resubmit an application. A vote on this applicant will be added to the agenda for April.

**E3**

**Presentation, discussion and vote on third iteration of comments on Lilac Hills Ranch Development, GPA 12-001, SP 1001, Master Tentative Map 5571, Implementing Tentative Map 5572. Comments may pertain directly to the project or to discrepancies by DPDS with regard to processing this project when compared to DPDS formally identified process or to other projects.**

Project Address is 32444 Birdsong Drive, south of West Lilac Road. The project proposes the construction of 1,746 dwelling units including multi-family, commercial, parks, trails, a school, age restricted community, waste recycling and collection facility and other associated civic uses. The project consists of a General Plan Amendment, Specific Plan, Rezone, two tentative maps, a Major Use Permit and an Open Space vacation. The approximate 608 acre project site is located south and west of West Lilac Road, generally east of Old Highway 395 and north of Mountain Ridge Road. (Hutchison)

**Discussion:**

Britsch and Jackson recuse themselves. Hutchison presents a summary of the subcommittee report [attached as modified]. Chris Brown, representing the applicant, acknowledges the report and offers to answer questions. Smith asks about Accretive's schedule for responding to the Project Issues Checklist. Brown says responding to the checklist is a work in progress, and is being done in connection with Draft Environmental Impact Report [DEIR]. Brown wanted to have a more complete submission, but he says the process is one of iteration. Hutchison asks about the schedule for completion of the DEIR, and Brown says it will likely be complete in early summer. Brown says the DEIR document is a County document and they must accept it before release to the public for comment. He says the applicant is working feverishly to complete the missing parts of the submission. Glavinic asks about traffic issues. Hutchison responds that the traffic study is not yet completed. Rudolf congratulates the subcommittee. He then laments the need to review the same information over and over again. He notes that the same problems with the project that existed 5 years ago remain today. He adds that it's shameful to have a process that is so unusual and contrary to the requirements of CEQA. Smith criticizes the review process to date. He says we received many pages of information in this submission without a redline version that showed changes made to previous versions [a red-line version of the Specific Plan was provided through the County subsequent to receiving the initial documents]. Doug Johnson, Valley Center Parks and Recreation District General Manager, wrote a letter to VCCPG after reviewing the parks element for this project requesting that the County include the district in future planning and reviews of this project.

**Motion:** Move to approve the recommendation of the SC with the amendment by Rudolf regarding trails language.

**Maker/Second:** Hutchison/Quinley

**Carries/Fails:** 12-0-2 [Y-N-A] **Voice**

**Notes:** Britsch and Jackson recused themselves because of the proximity of their properties to the project.

**E4**

Discussion and vote on recommendations from the Equine Subcommittee regarding the draft Environmental Impact Report for proposed changes to the County's Equine Ordinance (Smith)

**Discussion:** Smith presents the Equine SC recommendation. He explains the present equine situation within the County. He describes the principal features of the proposed ordinance and suggests that Valley Center supports this proposal. Four tiers of horse quartering are proposed: Tier 1. Three boarded horses beyond personally owned ones. No commercial activities are permitted beyond the maintenance of three boarded horses. This tier would require no permit. Tier 2. Allows densities of ten horses per useable acre. An administrative permit is required. A management practices plan and site plan need to be submitted for approval. Tier 3. Ten to thirty acres in size and a discretionary permit is required. Management practices and site plans are required. Tier 4. Requires a site plan and a major use permit.

Smith says the question of whether one can bring additional horses to a tier 1 property without affecting the tier status did arise [yes, for day use as long as they don't reside there]. The SC recommendations to the County

are:

1. Tier 1 concept is good, and three boarded horses is a reasonable number. However, there should be some above-board opportunity for limited activities, such as riding lessons, as long as the number of horses is limited and no signage or internet advertising was used. This would better address the vast majority of technically noncompliant properties we currently have in Valley Center.
2. Densities of 10 horses per acre are too much, 4 horses per acre are unreasonably low, and 7 horses/acre is a more reasonable density.
3. Tier 2 permitting needs to be made available where property owners can reasonably be expected to generate the documentation on their own and not have the costs involved of formal documents like a site plan that they can't readily create themselves. Overall, the total costs for the property owner need to be noted instead of just listing the County's fees as that is typically less than half the cost.

The SC had no real objections to tier 3 and 4 facilities since they have full-time personnel on-site. The SC suggested that different requirements for different parts of the County would be a good idea, so they could be consistent with local usage. However, the County is concerned about litigation for allowing a regulation disparity based on location.

Smith cites requirements for 'organic' certification as being more reasonable than requiring a site plan for horse quartering. Glavinic asks about best management practices for manure vector control, runoff etc. Smith says Tier 2 does require plans for manure, runoff, and vector control. Smith elaborates further about best management practices [BMP] for tier 2 and above. Glavinic says there is a need to have BMP for tier 1 as well. Bob Davis says the concept of tailoring the ordinance to match present practices is inadequate. Says there are major holes in recommendations. He says that allowing commercial activity, such as riding lessons, in tier 1, where commercial activity never before occurred, is a mistake. Such a provision by right in tier one would be a big giveaway re traffic and other. Says tier 2 does have some oversight. Disagrees with the goal to make this permitting easy for existing horse-owner residents. Such horse-owners should have to 'pay to play' to have new commercial uses in residential areas. He says Valley Center will become a magnet for tier 1 commercial uses. Glavinic wants to add BMP to tier 1. Rudolf agrees with Bob Davis. He says the process for recommendations benefits existing horse owners and continues present practices. Smith refutes. Rudolf disagrees with winking at riding lessons and other commercial uses. Smith says code compliance would enforce the rules on such use. The recommendation is to have limited commercial activity [riding lessons] without major permit or cost. Smith suggests he is only member of SC who doesn't own a horse but he defends the notion of presumptive horse ownership for all of VC. Rudolf says recommendation leaves room for violation. Smith says VC should have horse ownership. Davis says checks and balances are cut from tier 1. Tiers 2,3,& 4 have oversight. He says there is no requirement to modify road agreements for anticipated traffic. He says similar problems would exist for tiers 2,3, & 4 regarding traffic with new commercial use. Smith asks about other cottage industries. Rudolf offers a definition of very small individual businesses that essentially doesn't affect traffic. Smith qualifies requirement for riding lessons. Bob Davis disagrees. Bret Davis asks for clarification of tiers. He asks if intent is to protect small operators. Smith says qualified yes. He then expands on tier 2. Bret Davis asks if intent is to protect small operator if offering riding lessons. Smith says he doesn't want to have tier 1 operators making a living on riding lessons, but he wants to allow limited activities. Smith says is trying to protect people who have a boarded horse and want riding lessons at the boarding site. Hutchison asks about training [Smith- specifically a tier 2 activity]. Bob Davis asks if a compromise can be limited and identify specific activities? Quinley recounts her personal horse experiences and appreciates the availability of lessons for tier 1. Rudolf says training for horse or rider should be tier 2. Debra Duncan, audience stakeholder, recounts her personal experience with horses. She relates her personal medical issues. The previous owner of her property set up the property for horse boarding. She says her neighbor complained about expanding arena pad a small amount. She relates her efforts to manage manure, her vector control efforts, and her noise control situation. She wants the proposed ordinance, which would allow her to board a few horses to supplement her income. She would be happy with tier 1 status. Her neighbor is non-compliant with the present rules, but there is no enforcement. She supports the proposed ordinance. She says people who don't like horses shouldn't live in VC or even other similar communities. Jackson asks Duncan if she approves of tier 1 as recommended [yes]. She says kids should be able to ride her horses during riding lessons rather than train on some other horses at a tier 2 facility. Under the proposed ordinance she would be completely permitted. She

thanks Smith for SC's efforts. Britsch says tier 1 should be specific about activities to limit activities. Glavinic doesn't want a new level of code enforcement for horse owners. Bob Davis says County will not have enforcement in tier 1. He says the County had the wisdom to ask for a site plan in tier 2 and should be heeded in tier 1. He wants to eliminate commercial activities from tier 1. Glavinic agrees. Norwood asks about intention of responsible owners. Smith thinks majority of VC would fall in tier 1 or 2. Says noncompliant owners want to be compliant, but there will always be someone who pushes the limits. Quinley asks if it is reasonable to limit tier 1 to three boarded horses and three riding lessons per day. Rudolf asks about who required professionally prepared site plan[Smith- County]. Rudolf asks if tier 2 permit would accept google map mark up. Duncan says she had to have an engineer complete a survey. Rudolf questions the need to comment on EIR as adequate. Smith says SC didn't think tier 1 was adequate in underlying ordinance. Bret Davis asks for clarification. Rudolf suggests SC should be asking for other ordinance alternatives in EIR. Smith says EIR looked at four alternatives with densities of 10 horses/acre, 4 horses/acre, a do-nothing alternative, and an environmentally superior alternative [this turned out to be the 4 horse alternative]. Smith says the SC supports the 10-horse alternative with the already listed modifications. Bret Davis says he could not support tier two modification. Jackson asks about DEIR. Smith has read it. Jackson asks if there are any other issues. Smith says objective is to bring current residents into compliance.

**Motion:** Move to approve the recommendations of SC, which supports the 10-horse alternative with the following provisions: Tier 1 would allow finite number of activities, e.g. riding lessons, per week. 10 horses for Tier 1 is too dense and should be reduced to 7.

**Maker/Second:** Smith/Bret Davis

**Carries/Fails [Y-N-A]: 10-3-0**

L A V E N T U R E	H U T C H I S O N	E V A N S	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	B O B D A V I S	B R E T D A V I S
N	Y	Y	Y	Y	Y	Y	A	A	Y	Y	Y	N	N	Y

**Notes:** Lewis departed before motion was voted; Vick absent

<b>F</b>	<b>Group Business</b>
<b>F1</b>	Announcements and Correspondence Received
	<ol style="list-style-type: none"> <li>1. DPDS to VCCPG; VC Industrial LLC Site Plan Modification; STP08-005W1; Owner: VC Industrial LLC at 858-404- 9314; Project Contact Person: Gary Piro at 760-744-3700 or <a href="mailto:piroengr@cs.com">piroengr@cs.com</a>; Project location: Cole Grade Road at Yuba Road. Project Description: When compete, project will contain RV storage; U-Haul or Moving Vehicles; storage of construction and farming vehicles and materials. There will be three buildings: a 30x 50 steel building used as a Weld shop; a 60x20 steel building attached to the Warehouse which has been on site for 12 years. And a 30 x 120 wood framed construction that will be used as an indoor sports training facility. (Laventure)</li> <li>2. Letter from Representative Duncan Hunter to VCCPG; Information about the shape of the new Congressional District that he represents which is the 50<sup>th</sup> Congressional District.. His district is a cross section of SW Riverside County and the majority of East and North San Diego County. His Escondido office is located at 333 S. Juniper Avenue, #110, Escondido, CA and the telephone is 760-592-0271. He welcomes calls about concerns that any of his constituents may have.</li> <li>3. Butterfield Trails, Tentative Map 2, TM5551, MUP 08-0028. Owner of housing development is Wayne Hilbig and the project is located at the Valley Center Road and Sunday Drive. (Vick)</li> </ol>
<b>F2</b>	Discussion and distribution of Form 700 (Smith)
<b>Discussion:</b> Smith discusses need to fill out and submit Form 700.	
<b>F3</b>	Discussion of County Ethics Training for VCCPG members (Smith)

<b>Discussion:</b> Smith advises on the need for all members of the planning group to complete the on-line training provided by the Fair Political Practices Commission.		
<b>F4</b>	Discussion and vote on new members for the South Village Subcommittee (Vick)	
<b>Discussion:</b> Vick advises that three members are resigning from the SC [Brian Bachman, Dave Anderson, and Ann Quinley]. He recommends two new members for the SC: Will Rogers and Brandon Strausbaugh.		
<b>Motion:</b> Move to make the recommended changes to the membership of the South Village Subcommittee		
<b>Maker/Second: Quinley/Smith</b>		<b>Carries/Fails [Y-N-A]: 13-0-0 Voice</b>
<b>F6</b>	<b>Subcommittee Reports &amp; Business:</b>	
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)	Lilac Hills Ranch [Accretive] – Steve Hutchison, Chair	
m)	Equine Ordinance - Oliver Smith, Chair	
<b>F7</b>	<b>Next regular meeting scheduled for 8 April 2013</b>	
<b>G</b>	<b>Motion to Adjourn</b>	<b>9.52 pm</b>
	<b>Maker/Second: Smith/Quinley</b>	<b>Carries/Fails: 13-0-0 [Y-N-A] Voice</b>

**Material appended as cited in item E3:**

March 11, 2013

To: Mark Slovick, Project Manager, Lilac Hills Ranch Project

From: Valley Center Community Planning Group

Re: Lilac Hills Ranch Specific Plan and Related Documents,  
GPA 12-001; SPA 12-001

On 11 February 2013, the San Diego County Department of Planning and Development Services [the County] electronically distributed the third draft of the Lilac Hills Ranch [the Project] Specific Plan and tentative maps, submitted to them by Accretive Investments [the Applicant], to the Valley Center Community Planning Group [VCCPG]. Printed hardcopies of the documents were received in the mail about a week later.

Notably, the released documents do *not* include the proposed general plan amendment text, the collection of technical reports that support the specific plan assertions, or a letter from the applicant that responds to the Project Issue Checklist. The Project Issue Checklist contains approximately 1000 major and minor issues with the Project, raised by the County, Bonsall Sponsor Group and VCCPG in response to the Applicant's second draft specific plan, submitted

on 25 September 2012. The Applicant was to have submitted the Project Issue Checklist letter by 31 January 2013 as required in the County's response to the second draft specific plan dated 10 December 2012. However, the Applicant was granted an extension of 60-days to submit the letter. At about the same time the extension was granted, the County released the third draft of the Project's specific plan for public review.

The Project Issue Checklist letter required by the County is crucial to the effective review of all aspects of the Project. Without the letter, it is impossible to know what remedies, if any, the Applicant proposes to resolve those identified issues. The issues listed for the first and second drafts of the specific plan have largely remained unaddressed in the present third draft. The Applicant's third draft has particularly failed to address the major issues relating to building a project of such large urban scope in a rural, agricultural area removed from the infrastructure needed to sustain it. This Project is at odds with the San Diego County General Plan, adopted in August 2011, and the Valley Center Community Plan and Bonsall Community Plan, which are integral to the General Plan. The responses to the Project Issue Checklist will determine, in great measure, how the applicant intends to reconcile, or not, the Community Plans of Valley Center and Bonsall and the County's General Plan with their Project's specific plan. Presently, the Lilac Hills Ranch Specific Plan is diametrically opposite of the intended outcome of the General and Community Plans.

Not surprisingly, the third draft of the specific plan continues to be vague about many important details and avoids specifying the details of the Project at the level required by state law. At the stage of the third draft, one expects that issues raised over six months ago would be addressed or explained in the context of the General Plan and Community Plans.

However, we are aware that in order to remain effectively engaged in the review of this Project, we must respond to the recently released third draft specific plan.

Based on the materials received to date, *the Valley Center Community Planning Group continues to be strongly opposed to this Project's approval or construction.* Because so much of what is presented in this third draft of the specific plan is essentially the same as the previous two drafts, we will reiterate our major concerns followed by specific concerns raised by the third draft. You should reference our previously submitted comments on specific plan drafts one and two along with our present comments, since nearly all still apply. We reserve the right to make further comments and to revise previous comments as more detailed documentation is released to the community in the future. This letter, and letters dated 11 June 2012, 9 July 2012, and 22 October 2012 [attached] should not be construed as our "one bite of the apple."

## **Major Concerns**

**1. *The Project is too large and too dense for Valley Center and it is improperly located***— Placing 1,746 homes and 5,000 people on 608 acres with densities as high as 20+ dwelling units per acre is simply incompatible with the rural location in which the Project has been sited.

**2. *Roads and Traffic***— The nature of the roads that must carry traffic generated by Lilac Hills Ranch is one of the most fraught and difficult topics associated with this project. The area has been able to move cars across winding, two lane roads that pass through hilly landscape only because of its present lack of density. With the addition of 1,746 homes, the roads will, without extensive new road construction plus considerable widening and straightening of existing roads, will be greatly challenged to handle, safely and efficiently, the additional five thousand

individuals who will populate the development. The County's very limited road construction budget is already over-taxed, and unlikely to provide for the huge influx of automobiles created by Lilac Hills Ranch. Questions of the cost of off-site road construction, evacuation needs and acquisition of rights-of-way over existing private roads by the Applicant, are also extremely serious.

**3. *Compliance with the General Plan***– The Lilac Hills Ranch Specific Plan threatens to overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion and community involvement, millions of dollars in government expenditures and countless hours of effort on the part of local citizens. If the Lilac Hills Ranch Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the General Plan. Exactly what destruction of local communities does the General Plan prevent?

**4. *Services and Infrastructure-Water, Schools, Fire, Waste Treatment***– Infrastructure is expensive. Putting in new roads, adding additional lanes to a bridge, building a fire station, putting up a new school, installing sewer and waste treatment plants and building trails all cost large amounts of money. A principal reason why the General Plan Update strongly favors "compact, town center developments" while stating that it intends to limit "growth in areas without adequate roads, water and sewer service" is because of the demands on the public purse for building these infrastructure items over and over.

Lilac Hills Ranch is seeking to build a city the size of Del Mar that will require an almost entirely new infrastructure--new roads, schools, sewer systems and a broad range of other infrastructure items. That a private development could or would build this expansively strains credulity. The Valley Center Community Planning Group doubts the viability of this approach.

**5. *LEED/Sustainable and Walkable Community***– It is necessary for the Lilac Hills Ranch project to argue that they are potentially able to qualify for LEED ND certification, or its equivalent, in order to avoid the General Plan prohibition on Leapfrog Development. The project, placed as it is, miles from the heart of Valley Center, violates Guiding Principle 2 and General Plan Policy L-1, which define and govern Leapfrog Development, not to mention one of the fundamental precepts of LEED ND, which is to avoid green field development. Leapfrog Development is defined as Village densities located away from established Villages or outside established water and service boundaries. Lilac Ranch Hills *is* leapfrog development and it cannot qualify as a LEED community under any reasonable understanding of the standards.

**6. *Agriculture***– The General Plan Update has set aside the area where Lilac Hills Ranch would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project proponents, the area is not characterized by *historical* agricultural activity. It is a present-day agricultural area. Avocado, citrus, cactus commercial nurseries and other farm operations are located in and around the project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building Lilac Hills Ranch in the area for which it is currently planned would greatly damage many productive, beautiful and successful agricultural operations.

**7. *Twists of meaning and lack of clarity in the plan***– One of the most difficult aspects of the Lilac Hills Ranch Specific Plan is the extent to which it makes misleading claims. They would

have us believe that they are building a LEED ND or equivalent development even though Lilac Hills Ranch violates virtually all LEED standards, that adding 5,000 residents to a rural area actually improves traffic over narrow winding back roads, that grading and moving 4.4 million cubic yards of earth (enough to build a path 4 feet wide around the equator of Earth) preserves natural resources and habitat for animals.

Elaboration of these major concerns is available in the comments submitted by the VCCPG on 22 October 2012 [attached below].

## **Other New Concerns**

### **General Plan Conformance**

The Lilac Hills Specific Plan takes care, in several sections, to address the General Plan and Valley Center Community Plan. Yet the Lilac Hills Ranch Specific Plan fails to adequately acknowledge the fact that both of these thoughtfully constructed governing documents intend a completely different set of uses for the Lilac Triangle of west Valley Center, and fails to provide justification for the dramatic changes it proposes. The area was zoned for and intended to accommodate agricultural activities and large-acreage residential uses. The proposed Lilac Hills Ranch project is clearly incompatible with these intended uses. Both the General and Valley Center Community Plans designate other areas for land-uses such as Lilac Hills Ranch project proposes. If one were to propose and construct a residential project of this magnitude that would be useful to society in general and this region in particular, they would apply their efforts to the central village area of Valley Center. The current project, as proposed, is a cynical endeavor.

On January 24, 2013 San Diego City Mayor Bob Filner, in discussing a large development called One Paseo that would add dense commercial and residential use to Carmel Valley said, "Look, the community plan was a contract as far as I could see."

The parcel on which One Paseo would be constructed is zoned for 500,000 square feet of office space. The project initially intended to construct 2.1 million square feet of development, but the project has since been scaled down to 1.4 million square feet. "I don't understand how anybody who said they respected the community starts off with four times what the community plan says," Filner said at a public hearing, "I don't understand how you start with that." "After all," the mayor said, "the community plan can be considered a contract and should not be violated without substantial reason. ...They are agreements with the community on the way we ought to develop," he said. "People spend a lot of time going into making that a shared vision and it's a shared vision that **only with the consent of both sides**, do you modify." (emphasis added)

Those who read about the Lilac Hills Ranch Plan iteration after iteration well may have some of the same questions that Mayor Filner raises. The Applicant plans to locate up to 2.9 units per acre on land that currently allows, under the new County General Plan, 1 dwelling until per four acres (for 400 of the acres) or 1 dwelling per 10 acres (for 132 of the acres). Thus the land on which the Applicant wishes to build 1,746 homes is reserved in the General Plan for **much** lower density. The Applicant would increase the density not four times over what the General Plan permits (as in the One Paseo project) but more than 13 times the present allowable density. If four times the density may indicate a lack of respect for the community, 13 times the allowable density certainly indicates callous disregard for community character and community concerns.

Consider the 10 guiding principles that the San Diego County General Plan outlines for development:

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
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.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

Can anyone who has read the Lilac Hills Ranch Specific Plan submission believe that it does not violate at least 8 or 9 of them? It requires the development of new roads, a new sewer system, and new water sources—all of them described vaguely and many of them resources to which the applicant does not have clear title or a well developed plan for acquiring. It moves over 4 million cubic yards of earth by grading and by blasting. It is far from the heart of Valley Center where denser development is being accommodated.

### **Relationship to General Plan**

The specific plan cites the General Plan Amendment Report and Appendix A to justify the project within the context of the County's General Plan and the included Valley Center and Bonsall Community Plans. Neither the General Plan Amendment Report, nor Appendix A, is part of the submissions from the Applicant at this point, making comment impossible.

Given the absence of the General Plan Amendment Report and Appendix A, we are led to assume that sufficient justification and consistency with the County's General Plan does not yet exist and, therefore, cannot be made public and a part of this review. Consistency with the recently adopted General Plan is a fundamental first step in proposing a development of this magnitude...a step that this project continues to stumble over.

The degree of change proposed by this project will grossly change the character of the existing rural, agricultural area.

### **Specific Plan Goals**

The Applicant suggests that their Project will "augment" the several other large-scale projects along I-15 between Escondido and Fallbrook. A thoughtful analysis of the referenced projects will show that the only other project that compares with this Project is Lake Rancho Viejo at Hwy. 76. The other projects were approved under a less demanding older General Plan and the two largest projects, Circle R Ranch and Lawrence Welk Resort, are actually clustered

developments with an associated open space component of about 40% of the total acreage, unlike this Project which is currently expressing only a 16% open space component.

That being said, a guiding principal of the current General Plan [principle #2] is to permit high-density development within or next to already developed property so that the infrastructure requirements can be more easily met. The goal is not to spread dense development to outlying rural areas where infrastructure must be extended and expanded to meet those needs, as is the case with this Project.

Another new wrinkle in the current specific plan is the Applicant's desire to allow homes proposed for construction within the Project, instead, to be used, possibly, for a time-share resort. This 'possibility' confounds the stated description of the Project as a residential community and wanders even farther from the definition of "specific" in the term 'specific plan.'

### **Sustainable Community Goals/Policies**

In this iteration of the specific plan the Applicant has chosen to diminish their commitment to sustainability by making some of their once earnest goals and features decidedly optional. The recycling facility will be built "if feasible." The use of existing Green Building standards adopted by the County will be implemented but builders will be required only to offer homeowners the "option" of installing energy efficient fixtures and appliances. And, they have abandoned completely their commitment to implementing structural systems that achieve high performance thermal efficiency. These sagging goals seem disingenuous.

### **Land Use Plan**

The Land Use Plan shows some considerable changes based on the shifting acreages among the different types of land uses in the Project. However, the phase descriptions continue to be very conceptual rather than specific. The question continues to be: at what point will the specific plan become specific rather than merely suggestive, contingent or conceptual? There continues to be only one Tentative Implementing Map for phase one with the others for phases 2-5 not scheduled to appear for some length of time after approval of the project. This is rather like buying a pig in a poke.

### **County Land Use Regulations**

The applicant has not justified their proposed general plan amendment to amend the Regional Land Use Element Map changing the Regional Category Designation of their property from Semi-Rural to Village and Commercial designations. To build what the applicant proposes, it is necessary for the designation to change, but they have offered no justification for the change. Such changes to the County's General Plan as well as the Valley Center Community Plan and the Bonsall Community Plan should be justified. The point of such plans is to guide development in a direction that is consistent with the community's desires and commitments to the County for growth.

### **Distribution of Land Uses**

Table 1 – Land Use Summary inaccurately shows a total of 608 net acres, however, addition of the line items in the table totals 611.3 net acres. This should be clarified and corrected.

Table 1 shows that proposed public parkland in the Project decreased from 21 acres in a few parks to 12 acres in a single park since the previous iteration of the specific plan. And, private parkland increased from 4.4 to 11.8 acres in 14 small pocket parks. The county standard for parkland is 15 acres per thousand population for local parks. It seems the numbers are moving

in the wrong direction. Further, larger parks would serve the Project better than the multitude of pocket parks described.

### **Parcel Size Distribution in the Vicinity of Lilac Hills Ranch**

The applicant's 1-mile analysis [fig. 6] seems to want to justify high density for the Project by citing that 18% of lots are less than 2-acres. These smaller lots are not recently created, they are the residue of earlier, less carefully considered general plans. The requirements have changed. And, by deduction, 82% of present lots within the 1-mile radius [wherever it is centered] are two acres or larger and consistent with the General Plan. In fact, 46% of lots in the 'radius' are greater than 4-acres. A few moments of reflection would lead to the understanding that the applicant's representation of the parcel size distribution can be misleading. Having a greater number of smaller lots within an area does not mean that the majority of the acreage is in smaller lots. In fact, the majority of the acreage within the radius is in larger lots. The analysis should be looking at the acreage within categories of lot size rather than the number of lots of a particular size.

The 5-mile radius analysis [fig. 5] is equally skewed since it attempts to include Circle R Ranch development and Lawrence Welk Resort as high-density developments. Both of those developments are clustered developments and include a minimum of 40% open space, a fact conveniently sidestepped in the analysis. The mobile home park at Lawrence Welk was permitted under an older general plan that has since been superseded.

It should be remembered that the recently adopted general plan and the associated community plans are the defining factor in describing the desired plan for the community rather than the parcel size analysis of the Applicant.

### **Development Approvals Needed**

Apart from the need to amend the General Plan, and the Valley Center and Bonsall Community Plans, the Applicant is asking for approval of a site plan for "V" and "D" special area regulations. Setback designator "V" allows for very close urban spacing of buildings, spacing that is grossly inconsistent with the General Plan and, consequently, the Valley Center Community Plan.

Special Area Regulator 'D' has several Site-Plan criteria that this project fails to adequately address:

**"a. Building Characteristics.** The dimensions, color, architectural design of the proposed buildings and structures shall be compatible and in keeping with those existing in the designated area."

The proposed project intends to inject a sweepingly new architectural treatment to the designated area. The types, dimensions, densities and architectural design being proposed are not consistent with the Lilac Triangle.

**"b. Building and Structure Placement.** The placement of buildings and structures shall not detract from the visual setting or obstruct significant views."

The density and heights of proposed buildings and other architectural features will dramatically and adversely impact the present rural, natural and agricultural setting of the area. This impact cannot be mitigated under the provisions set forth in this specific plan and will deprive existing residents of their expectation of a rural, natural life style

and environment.

**“c. Landscaping.** The removal of native vegetation shall be minimized and the replacement vegetation and landscaping shall be compatible with the vegetation of the designated area and shall harmonize with the natural landscaping. Landscaping and plantings shall be used to the maximum extent practicable to screen those features listed in subsections “d” and “e” of this section and shall not obstruct significant views, either when installed or when they reach mature growth.”

The project proposes to excavate and fill over 4 million cubic yards of earth in pursuit of building sites and common areas on a total of 582.2 acres. Nearly all of the native and agricultural vegetation will be removed and existing agricultural areas will be severely diminished and completely altered as a result. The proposed plan will leave narrow strips, of so-called, biological open space that will be of little or no use to wildlife once other fuel modification requirements are met.

**“d. Roads, Pedestrian Walkways, Parking and Storage Areas.** Any development involving more than one building or structure shall provide common access roads and pedestrian walkways. Parking and outside storage areas shall be screened from view, to the maximum extent feasible, by existing topography, by the placement of buildings and structures, or by landscaping and plantings.”

The roadways proposed do not provide adequate ingress and egress for the proposed housing and commercial areas. The applicant has failed to provide substantive documentation of legal rights to develop adequate access routes for evacuation requirements. Further, the trail network proposed appears to depend on access along Covey Lane, a private easement for which the applicant has demonstrated no legal right.

**“e. Grading.** The alteration of the natural topography of the site shall be minimized and shall avoid detrimental effects to the visual setting of the designated area and the existing natural drainage system. Alterations of the natural topography shall be screened from view by landscaping and plantings which harmonize with the natural landscape of the designated area, except when such alterations add variety to or otherwise enhance the visual setting of the designated area.”

As noted earlier, the project proposes to move nearly four and a half million cubic yards of earth on the 608-acre site, with blasting required for about 20% of that total. Obviously, this will not result in minimal alteration and it will detrimentally affect, in the most gross way the visual setting of this rural, agricultural area.

**“f. Signs.** The number, size, location, and design of all signs shall not detract from the visual setting of the designated area or obstruct significant views. Subsequent to the site plan review and approval, any alteration to signs other than general maintenance shall be subject to a new Site Plan or an Administrative Permit.”

The only reference to signage found concerns the monuments at the entrances to the Project. The monuments description in the specific plan is more nearly marketing language than specific details about construction design and materials. A conceptual design is provided, but it is merely suggestive and provides no assurance that it is consistent with the Valley Center Design Guidelines. Clearly, the specific plan should

defer to the existing Valley Center Design Guidelines, and those guidelines should be acknowledged in this plan to direct the implementation of signage for the project as a whole, but especially for the commercial areas within the project.

**“g. Lighting.** The interior and exterior lighting of the buildings and structures and the lighting of signs, roads and parking areas shall be compatible with the lighting employed in the designated area.”

Since the designated area is presently rural and agricultural and subject to the Valley Center Design Guidelines, the Project and its specific plan should recognize those guidelines as the authority for all lighting implementation. Generally, little lighting is used in this area presently, so any change will be a significant departure from what exists and will severely challenge the present conditions.

The specific plan is ambiguous about the need for a recycled water storage tank. This tank may, or may not, be part of a major use permit required for the Water Reclamation Facility. More details and specificity would be helpful.

Another approval needed by the Applicant is for the vacation of two existing biological open space easements totaling 3.64 acres. These two easements were at one time considered important set-asides for maintaining regional biological resources, resources that cannot be turned on and off and still retain significance. The Applicant will be setting aside over 102 acres of open space for the same purpose. It would seem prudent and reasonable to include the two existing easements in addition to the proposed easements for this Project.

### **Development Standards and Regulations/Design Concept**

The Applicant's specific plan suggests that the Project will help support the area's reasonable share of projected population growth. However, that is a specious assertion given that Valley Center's reasonable share of growth is 905 dwelling units [only 755 more than the existing General Plan provides] and more than that number have been accounted for in the plans for the north and south villages. There is no apparent need for the 1746 units being proposed by the Applicant, especially as they are proposed for an area remote from community infrastructure.

### **Senior Citizen Neighborhood**

Although not apparent to the Applicant, the designation of 468 dwelling units for an age-restricted Senior Citizen Neighborhood with a 200-bed assisted living facility could present a significant problem for prospective residents of those units who may need emergency health care. Presently, emergency services cannot respond to the Project within the guidelines required for such service. In addition, the nearest hospital is about 17 miles distant. To have a neighborhood facility for such a potentially fragile population without emergency medical services close at hand may prove problematic.

Another issue is the contention by the Applicant that the addition of kitchens to the 200 individual units in the Group Residential/Care Facility at the time of construction would not impact the total number of other dwelling units [1746 dwelling units]. It seems the definition of 'dwelling unit' has shifted in this case. Under current zoning regulations, this defines an apartment. This is an increase in density of 200 units from the 1746 DU request to a total of 1946 DU's. So, although not counted in the total dwelling units for the Project, they do add, effectively, 200 dwelling units that would seem to drive the overall density up to about 3.2 du/ac from 2.9 du/ac. That proposed increase in density results in an increase in Average Daily Trip

traffic generation for the proposed Project. Even without the kitchens, these units are a density deception.

### **Town Center/Neighborhood Centers**

The bed and breakfast of earlier specific plans has become a substantially sized, 50-bed Country Inn. Commercial square footage has been increased from 75,000 sq. ft. to 90,000 sq. ft. (see II-10 Table 3: 61,500 sq. ft.– Specialty Commercial; 28,500 Office). Rather than scaling back the Project for rural compatibility as the VCCPG has suggested in previous comments, the current specific plan is expanding and extending commercial and office areas. The language used to describe these ‘centers’ continues to be vague and loose and non-specific.

### **On-site Water Reclamation Facility**

There continues to be ambiguity concerning the water reclamation facility being proposed. The specific plan states that Valley Center Municipal Water District will direct trucking of wastewater to an off-site treatment facility for the initial development [presumably phase one], and that wastewater from up to 100 dwelling units may be trucked off-site. However, phase one consists of 350 units, which may necessitate additional trucking of wastewater over narrow twisting roads.

The Project will not build a wastewater treatment plant during the initial phase of development, but, it is not clear from the specific plan when the facility is to be built. The current version of the specific plan has reverted to an earlier proposal of collecting and trucking the effluent to an off-site facility for treatment, making it unavailable for irrigation. This procedure will add numerous daily trips to and from the Project, trips that could go on for a lengthy but undetermined period. The last proposal was to construct a temporary 26,000-foot [5 miles] four –inch force main sewer line where effluent would be pumped from a temporary pumping station. While the current specific plan mentions treating the trucked effluent, it does not mention if the reclaimed water would be transported back to the Project, which would double the daily trips to and from the Project.

The specific plan has not defined the proposed Project’s wastewater management system beyond a platitudinous discussion of top-level options. But, it does appear that a wastewater reclamation plant for recycling of wastewater is proposed on-site to the Project. There is no discussion whatsoever on sewage treatment, leaving an informed reader asking two fundamental questions:

1. If the on-site wastewater plant is only engaged in water recycling, to which Title 22 level of standard and intended usage is the Applicant proposing (see table below)? Describe the on-site treatment processes to be employed.

Table D-1 summarizes the water quality criteria for the four types of recycled water as defined by the Title 22 Code of Regulations. These water types are: disinfected tertiary; disinfected secondary 2.2; disinfected secondary 23; and un-disinfected secondary. Table D-2 summarizes the minimal allowable non-potable uses for each recycled water type. All information contained in this appendix is adapted from, "California Department of Public Health – Regulations Related to Recycled Water January 2009."

Table D-1. Water Quality Standards for Various Water Recycling Sites		
Water Type <sup>1,2</sup>	Parameter	Quality Criteria <sup>4,5</sup>
Disinfected Tertiary <sup>3,6</sup>  (recycled water that has been oxidized, filtered and disinfected)	Total Coliform	<ul style="list-style-type: none"> <li>• Median concentration must not exceed 2.2 MPN/100 mL using the last 7 days analyses were completed</li> <li>• Must not exceed 23 MPN/100 mL in more than one sample in any 30 day period</li> <li>• Must not exceed 240 MPN/100 mL at any time</li> </ul>
	Turbidity for Filtration Using Natural Undisturbed Soils or a Filter Bed	<ul style="list-style-type: none"> <li>• Must not exceed average turbidity of 2 NTU within a 24-hour period</li> <li>• Must not exceed 5 NTU more than 5 percent of the time within a 24-hour period</li> <li>• Must not exceed 10 NTU at any time</li> </ul>
	Turbidity for Filtration Using Microfiltration, Ultrafiltration, Nanofiltration or Revere Osmosis	<ul style="list-style-type: none"> <li>• Must not exceed 0.2 NTU more than 5 percent of the time within a 24-hour period</li> <li>• Must not exceed 0.5 NTU at any time</li> </ul>
Disinfected Secondary – 2.2  (recycled water that has been oxidized and disinfected)	Total Coliform	<ul style="list-style-type: none"> <li>• Median concentration must not exceed 2.2 MPN/100 mL using the last 7 days analyses were completed</li> <li>• Must not exceed 23 MPN/100 mL in more than one sample in any 30 day period</li> </ul>
Disinfected Secondary – 23  (recycled water that has been oxidized and disinfected)	Total Coliform	<ul style="list-style-type: none"> <li>• Median concentration must not exceed 23 MPN/100 mL using the last 7 days analyses were completed</li> <li>• Must not exceed 240 MPN/100 mL in more than one sample in any 30 day period</li> </ul>
Un-disinfected Secondary  (recycled water that has been oxidized but not disinfected)	---	---

2. In what location will sewage treatment occur with a process description of the level of treatment and methodology for disposal of residual solids including long-term agreements if other agencies are involved in solid waste handling?

### Residential Component

In the first two drafts of the specific plan, the Applicant claimed an overall density of 2.9 du/ac, which is apparently the smallest applicable category the County recognizes for overall density [the calculation is 1746 du divided by 608 acres]. But, that density has been revised in the third draft, and reported to be an overall density of 2.36 du/ac [the result of dividing 1371 dwelling units on 582.2 acres]. However, that density yield seems specious. The 582.2 acres used in that calculation include open spaces, roads, parks and schools, areas that do not play much of a role in the perception of density. Oddly, the 582.2 acres does not include the areas with the C-34 designation or the 375 du that are a part of it.

Looking at the 375 dwelling units in the Project that occupy 23.8 acres in the C-34 zoned areas, reveals urban densities in excess of 13 du/ac and, of that total, nearly 8 ac would have an urban density in excess of 20 du/ac.

And those densities exclude the 200-bed assisted living facility that questionably doesn't factor into the number of dwelling units.

As we noted in earlier comments, densities of this magnitude [13.8 du/ac and 20.75 du/ac and even the overall density of 2.9 du/ac] are more comparable to large urban centers than the rural, agricultural areas that surround the Project property.

### **Services and Infrastructure (Water, Schools)**

The Applicant asserts that it is “looking at” four sources of water to meet the Projects needs in addition to Valley Center Municipal Water District [VCMWD] water, including “ground water, rain water harvesting, grey water and reclaimed water.” Apart from the existing water wells on-site for ground water, which will be subject to VCMWD guidelines that are unexplained, the Applicant is vague about the other sources and specifically how they will be employed. The Applicant says cisterns and roof collection systems are “allowed” on single-family dwellings, but does not commit to employing them. Grey water systems are an “allowed use”, but there is no commitment to employ them. And, the Applicant suggests the possibility of obtaining additional treated water from the Moosa Treatment Plant, although the plant does not have tertiary treatment capability and does not produce recycled water. This is all too fuzzy for a specific plan.

The issue of which school districts will be serving the proposed Project continues to be unresolved. The latest specific plan proposes a twelve-acre site for a K-12 school, but there is no Project Availability Form from Valley Center-Pauma Unified School District, or Bonsall Union School District agreeing to manage the school. Further, the Applicant has excluded the Fallbrook Union High School District from their current specific plan even though the Project is still partially within that district and potentially will be served by that district. The issues of school location and school district choice matter because it fundamentally affects the project’s required traffic study. Are students to go to school in Valley Center and be bussed or driven over that set of highly impacted roads or are they to go to school in Bonsall or Fallbrook and be transported that way? Where traffic will be directed affects where roads will be impacted and need improvement.

Since neither Bonsall nor Valley Center has indicated a willingness to manage an additional school, the Applicant now suggests that “a private school may desire to acquire the site for a ‘charter’ school.” It is further suggested that if neither a public nor private entity is interested in establishing a school, the project may just place housing on the site currently reserved for the school. How, then, are the community or other decision makers to know which roads will be impacted and by how many children (will we need to consider K-12 or just high school students) or how to evaluate the data provided in the traffic study?

### **Open Space/Conservation Policies**

The Project’s conservation goal of sparing the most sensitive habitats on the property presents itself well on first hearing. However, as laudable as saving sensitive habitat is [and it is required], the Project will be excavating and mounding the remainder of the Project site [that’s about 1.5 cubic yards of earth moved for every square yard of the Project property]. Further, the Applicant has abandoned the notion of developing any off-site mitigation of sensitive habitat within close proximity of the MSCP PAMA. So, restoration of habitat could occur almost anywhere else but the Project site or its immediate neighborhood. This prospect is dismaying in that the destruction of habitat in Valley Center may lead to restoration of habitat elsewhere in the county without benefit to Valley Center.

### **Circulation Goals & Policies/Street System**

The circulation goals/policies have changed little from the previous version of the specific plan, except in one respect. There is apparently no further interest in integrating private road development in the Lilac Hills Ranch Specific Plan with existing land uses in the surrounding areas and the regional transportation network. This appears to mean that the circulation system in the Project will be effectively closed except for the “Main St.” bypass to West Lilac Road. This has implications for the Special Area Regulation “D” designation site plan considerations.

Both figures 14 [Specific Plan Map] and 24 [Project Internal Circulation Map] show what is available of the internal road system, but continue to fail to show residential private roads in any of the residential phases. The maps are unclear about the connection of the two halves of the Lilac Hills Ranch Road in the vicinity of Covey Lane. The maps also show a residential private road arrow traversing over property outside the Project boundary with no explanation of right of way.

West Lilac Road forms much of the northern border of the Project and is a county mobility element road. The current specific plan changes the West Lilac Road Mobility Element Classification from a 2.2C light collector to a 2.2F light collector. It is unacceptable to make that change to accommodate the aims of the Applicant to divert traffic through their commercial center along ‘Main St.’ without regard to the existing community. The 2.2C light collector classification provides better traffic flow and greater traffic capacity because it includes dedicated turn lanes. These are essential characteristics for a mobility element roadway. The 2.2F light collector classification has a reduced two-foot shoulder, a rolled curb with graded pathway and a narrow right of way. Figure 25 of the specific plan shows a street section for the proposed change to West Lilac Road with an 8-foot minimum meandering pathway alongside. However, the standard should be a 10-foot minimum pathway.

The same concerns generated by earlier versions of the specific plan regarding roads that are graded to the natural contours with minimal disturbance to the natural terrain continue in this version. The lack of rural compatibility and sensibility in this specific plan extends to the residential architectural standards as well as the roads.

### **Community Recreational Elements**

The trails network is somewhat changed from previous versions of the specific plan, but the trail standards for the various types of trails continue to be an issue. The Project should be required to comply with the standards and guidelines set forth in the county’s Community Trails Master Plan, including those applicable to the Valley Center Planning Area. Pathways and trails should be a minimum of 12 feet wide unless topographically impossible. The standards for the Project’s ‘public’ trails allow the tread area to narrow to as little as 3 feet, an unacceptable width for new trails.

### **Conclusion**

Surely, the Lilac Hills Ranch Project tramples far too much of the General Plan and the Community Plans to be approved. The County should instruct the Applicant to revisit those plans and conform the Project to them. The Applicant’s General Plan Amendment and Specific Plan—which deviates so greatly from existing planning law—could, if approved, set a new precedent in San Diego County land use policy that overrides the intent of the General Plan and severely diminishes the authority of the community plans. The Applicant must provide the VCCPG the kinds of specific, detailed information necessary for a reasoned evaluation. Most of

what we have been presented so far is suggestive, contingent or conceptual with no intent to commit to a specific plan.

None of the substantive issues requiring resolution identified in either the October 22, 2012 Valley Center Community Plan comments or the December 10, 2012 Planning and Development Services letter to the Applicant have been addressed.

Those of us who have read iteration after iteration of the Lilac Hills Ranch Specific Plan are mystified. We are not seeking unusual or difficult documents. We wish merely to have this applicant produce the standard studies and analyses that all past applicants have been required to prepare so we can efficiently review the Project for compliance with the Community Plan and the General Plan. We want the Project to show respect for the General Plan and its principles. We want a project that will not destroy Valley Center, the lives of our neighbors and the entire planning process in the County.

## **Appended 22 October 2012 Comment Letter:**

October 22, 2012

To: Mark Slovick  
Project Manager

From: Valley Center Community Planning Group

Re: Lilac Hills Ranch Specific Plan  
GPA 12-001; SPA 12-001

### **Introduction**

On September 25, 2012, Accretive Investments submitted to the Department of Planning and Development Services [DPDS] the Specific Plan and tentative maps for their Lilac Hills Ranch Development. Subsequently the documents (Plan Text and some maps) were provided to the Valley Center Community Planning Group for review. The pages that follow provide commentary on the materials that we have in hand.

The available documents continue to be incomplete and not sufficient for a full review. Many key elements such as the Traffic Study and other technical reports are not yet available. We continue to reserve the right to make additional comments as more key documentation is released to the community. This letter and the letters dated June 11, 2012 and July 9, 2012 (both attached) should not be construed as our "one bite of the apple."

Furthermore, many of the objections contained in this letter have been raised in previous reviews. Most have not been addressed by Accretive in the new iteration of the Specific Plan and so our substantive concerns remain. We continue to be concerned as well by the lack of clarity in most aspects of the plan and with the absence key documents.

*Based on the materials available for review thus far, the Valley Center Community Planning Group is strongly opposed to the approval or construction of the Lilac Hills Ranch project. The pages that follow detail our objections to the Specific Plan. We begin by outlining seven areas that we find critically important—and that, in themselves, appear to be a strong argument for refusing the plan. Later in this document we discuss the seven objections in greater detail along with other, lesser concerns. The seven main objections include:*

**1. The Project is too large and too dense for Valley Center and it is improperly located.**

Placing 1,746 homes and 5,000 people on 608 acres with densities as high as 8.8 dwelling units per acre is simply incompatible with the rural location in which the Project has been sited.

**2. Roads and Traffic.** The nature of the roads that must carry traffic generated by Lilac Hills Ranch is one of the most fraught and difficult topics associated with this project. The area has been able to move cars across winding, two lane roads that pass through hilly landscape only because of its present lack of density. With the addition of 1,746 homes, the roads will, without extensive new road construction plus considerable widening and straightening, will be greatly challenged to handle, safely and efficiently, the additional five thousand individuals who will populate the development. The county's limited road construction budget will be severely taxed—and diverted from other pressing needs—to provide for the huge influx of automobiles created by Lilac Ranch. Questions of the cost of road construction, evacuation needs and acquisition of rights-of-way by the applicant are also extremely serious.

**3. Compliance with the General Plan** The Lilac Hills Ranch Specific Plan threatens to overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion and community involvement, millions of dollars in government expenditures and countless hours of effort on the part of local citizens. If the Lilac Hills Ranch Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the General Plan. Exactly what destruction of local communities does the General Plan prevent?

**4. Services and Infrastructure-Water, Schools, Fire, Waste Treatment** Infrastructure is expensive. Putting in new roads, adding additional lanes to a bridge, building a fire station, putting up a new school, installing sewer and waste treatment plants and building trails all cost large amounts of money. A principal reason why the General Plan Update strongly favors "compact, town center developments" while stating that it intends to limit "growth in areas without adequate roads, water and sewer service" is because of the demands on the public purse for building these infrastructure items over and over.

Lilac Hills Ranch is seeking to build a city the size of Del Mar that will require an almost entirely new infrastructure--new roads, schools, sewer systems and a broad range of other infrastructure items. That a private development could or would build this expansively strains credulity. The Valley Center Community Planning Group doubts the viability of this approach.

**5. LEEDS/ Sustainable and Walkable Community.** It is necessary for the Lilac Hills Ranch project to argue that they are at least potentially able to qualify for LEEDS certification in order to avoid the General Plan prohibition on Leapfrog Development. The project, placed as it is miles from the heart of Valley Center, violates Guiding Principle 2 and General Plan Policy L-1 which defines and governs Leapfrog Development. Leapfrog Development is defined as Village densities located away from established Villages or outside established water and

service boundaries. Lilac Ranch Hills *is* leapfrog development and it cannot qualify as a LEEDS community under any reasonable understanding of the standards.

**6. Agriculture.** The General Plan Update has set aside the area where Lilac Hills Ranch would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project proponents, the area is not characterized by *historical* agricultural activity. It is a present-day agricultural area. Avocado, citrus, cactus commercial nurseries and other farm operations are located in and around the project areas. These agricultural uses attract insect and fungal infestations which mean that aerial spraying is often necessary. Spraying would pose a danger to individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building Lilac Hills Ranch in the area for which it is currently planned would greatly damage many productive, beautiful and successful agricultural operations.

**7. Twists of meaning and lack of clarity in the plan.** One of the most difficult aspects of the Lilac Hills Ranch Specific Plan is the extent to which it makes misleading claims. They would have us believe that they are building a LEEDS or equivalent development even though Lilac Hills Ranch violates virtually all LEEDS standards, that adding 5,000 residents to a rural area actually improves traffic over narrow winding back roads, that grading and moving 4.3 million cubic yards of earth (enough to build a path 4 feet wide around the equator) preserves natural resources and habitat for animals.

## **Broader Discussion of the Seven Major Problems.**

**1. Lilac Hills Ranch is too Large, too Dense and in the wrong location.** To place a city the size of Del Mar in a rural area fundamentally alters the character of the community in almost every way. It poses major problems for evacuation in the event of fire (a major issue in a community like Valley Center), complicates the provision of services and the creation of adequate roads. The development destroys the quality of life for individuals who already live in that area.

There is nothing remotely like the proposed project in Valley Center. It's size—608 acres and 1746 dwelling units plus Assisted Living facilities of an undetermined size—its density—locating up to 8.8 dwelling units per acre on land that is currently zoned semi-rural by the new General Plan allowing only 1 dwelling unit per four acres (400 of the acres) or 1 dwelling unit per 10 acres (132 of the acres)—and its location of urban densities and infrastructure in an area long reserved for rural living and agriculture are all wrong for the site they have selected.

More fundamentally, there is no need for this project in order to provide housing or services for Valley Center. Valley Center is already accepting and planning for its share of San Diego County's growth through 2030 as predicted by SANDAG. About 25% of that growth will be served by the construction of two compact Villages built along Valley Center road. Valley Center population will nearly double from its current 19,000 to 38,000. In preparation for the construction of these Villages (which are near schools, fire protection, parks and libraries), Valley Center Road has been widened and improved at a cost of \$54,000,000.

Extending sprawl and urban development into agricultural portions of the county is a mistake—and for what purpose? Valley Center is actively planning and investing in developments that do a better job of locating homes where infrastructure and people already exist.

## Roads and Traffic

The Roads that exist in and around the site of the Lilac Hills Ranch project are decidedly small, winding and built to carry the volume of traffic associated with a relatively unpopulated rural area. The population increment that the Project proposes will necessitate extensive building, widening and reconfiguring of roads at great cost.

On October 12, 2012, the North County *Times* reported that the Board of Supervisors voted to reduce developer fees (TIF) by half. The fee rates, which have been a source of criticism from building industry leaders, were set to pay for \$900 million of expected road improvements. According to the North County *Times*, "County Officials now say \$353 million is needed to support growth because the county's newly approved General Plan favors compact, town-center development in rural communities and it severely limits growth in areas without adequate road, water and sewer service." Approval of the Lilac Hills Ranch stands in direct opposition to this decision. With the TIF greatly reduced, compact, contiguous development takes on even greater significance.

In addition to the need to build expensive new roads to carry traffic created by the development, the Lilac Corridor roads are a critical pathway for evacuation. In the event of a major fire or other disaster in Valley Center, the Lilac Hills Ranch development will act like a cork in a wine bottle. Its thousands of residents will clog the roads preventing the evacuation of residents who live in more central areas of Valley Center. Even costly new roads will likely not be sufficient to safely move the volume of traffic that will crowd them should evacuation be necessary.

The Specific Plan cites goals for its circulation plan that are clearly not met by the roads it would construct. The goals call for a safe and efficient circulation system but Figure 24 in the Specific Plan presents a circulation map that is highly inefficient. The connections between the northern and southern pods of the Project are tenuous. It is unclear that sufficient easements are in place to allow any connection between the north and south pods. The Project's entrance and exit in the south pod along Mountain Ridge Road is questionable in terms of legal access. Residential roads throughout the Project are only indicated by suggested starting points rather than mapped placements. It seems that the applicant is seeking the entitlements to build this Project without providing the details needed to evaluate the impact of the entitlements.

The *Traffic Impact Study* necessary to evaluate traffic and circulation impacts has yet to be provided. While it is clear that new roads will be constructed, considerable mystery surrounds what will be done and what traffic loads will be accommodated. Thus, the Specific Plan is lacking in adequate detail to enable proper analysis of the compliance of the proposed road network with county standards. In addition, the Valley Center context map incorrectly shows Road 3A as passing through the project. Road 3-A was deleted from the General Plan last year and should be removed from all maps of the area. *The Valley Center Community Planning Group asks that the Traffic study be provided at the earliest date possible because it is key to a clear analysis of traffic impacts.*

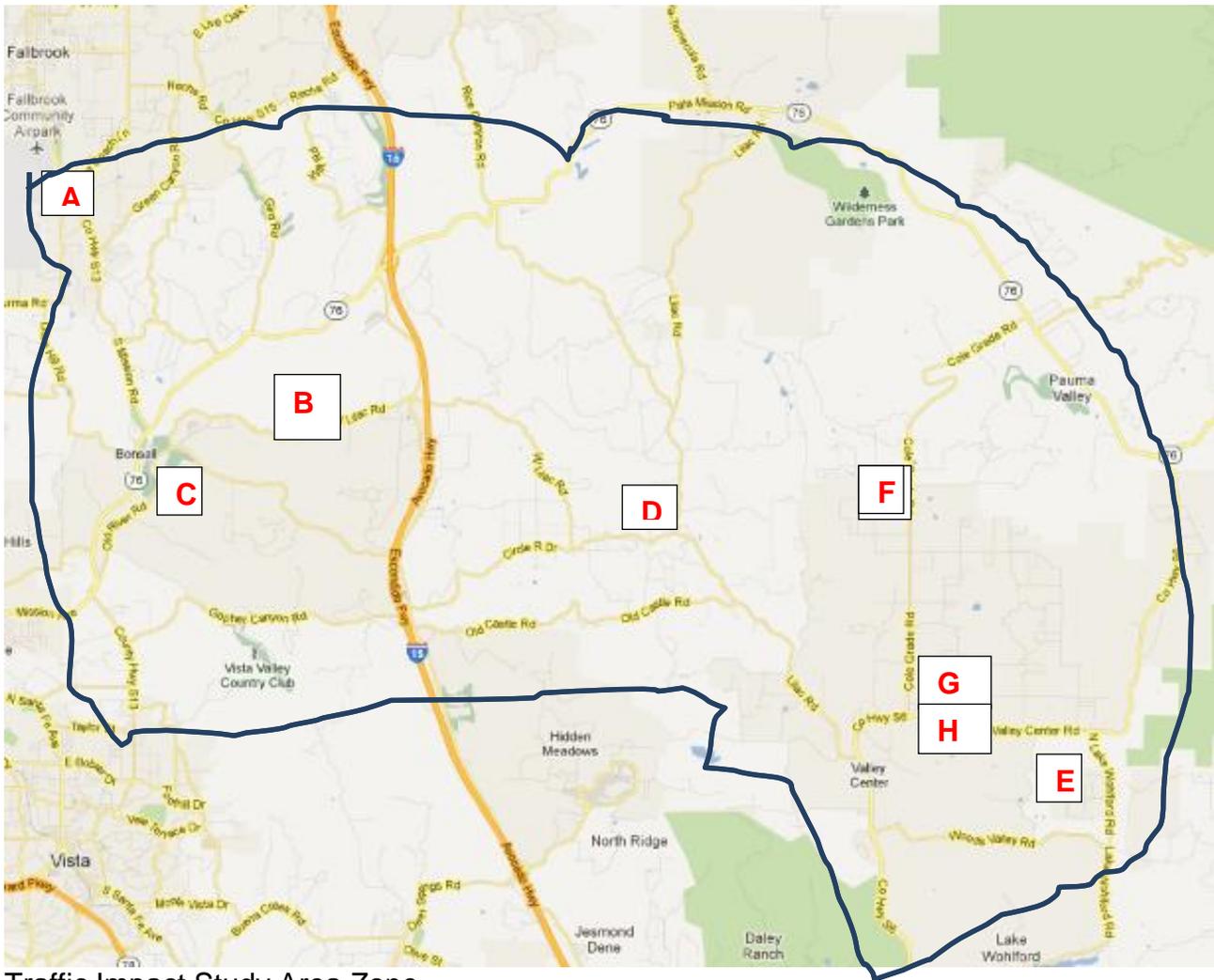
The private roads described in the Specific Plan and Master Tentative Map have several road intersection designs that pose safety concerns. Further, in the Specific Plan and Master Tentative Map the applicant is asserting legal rights to road easements on Private Roads for which the applicant likely does not have rights to access or use.

### Traffic Impact and Traffic Impact Study

The September 2012 second draft of the Specific Plan is the first release to the public by the County of any information that enables even rough order of magnitude (ROM) sizing of vehicular traffic generated by this proposed commuter, high density, urban development not serviced by transit facilities and nearly 20 miles from the nearest SANDAG designated Employment Center.

Using SANDAG Mixed Use Trip Generation Model V4 for Average Daily Trip (ADT) generation, it becomes apparent that approximately 31,000 average daily trips (ADT) will be generated. The 31,000 trips are *9 times* the current 3,500 ADT load that moves on Circulation element roads with current land use and residential pattern. If roads must carry this new volume of traffic they will require extensive off site public road improvements to avoid Level of Service F conditions. (See Appendix A for detail on the application of the Mixed Use Generation Model V.4)

Because of circulation patterns that will include Valley Center and Bonsall schools and other daily commutes, the Traffic Impact Study Area must include an area that covers roughly SR-76 to the north, Valley Center Road and Lake Wohlford Road on the east, Castle Creek/Gopher Canyon to the south, and East Vista Way in Bonsall to the West. The schools that may service the Project and an outline of the proposed Traffic Impact Study Area are below:



Traffic Impact Study Area Zone

A – Fallbrook High School

B – Bonsall Middle School

C- Bonsall Elementary School

D- Lilac Elementary (VC)

E- VC Middle School

F- VC High School

G- VC Primary School

H-VC Elementary School

*The Valley Center Community Planning Group requests that the County require that the Traffic Impact Study Area be as broad as indicated above and that the County release such Traffic Impact Study for Public Review immediately.*

Safety Concerns

In *West v County of San Diego et.al. 37-2008-00058195-CU-PO-NC*, the County is being sued for defective design of the intersection of Covey Lane at West Lilac Road resulting in a vehicular fatality on August 9, 2007.

The Applicant is proposing multiple traffic designs that have systemic safety issues far greater than *West* alleges. The private roads described in the Specific Plan and Master Tentative Map have multiple road intersections and designs that raise safety concerns.

For example, the Applicant's proposed use of Covey Lane as an "Interim Public Road" 600 feet from the intersection of West Lilac Road (as indicated in the Tentative Master Map) along with dramatically increasing Average Daily Trips at the intersection is a major safety issue. There is a very limited sight line at this intersection. At the level of traffic the Applicant is proposing, extensive off site improvements to West Lilac Road and the addition of a traffic signal or similar controls are likely required. The Applicant has not provided for these measures in his design.

There is an additional safety issue of major concern with the Applicant's proposed integration of the existing Covey Lane Private Road with the "Covey Lane 600 foot Interim Public Road." The merger of the existing 40' private road with the Public Road appears not to conform to road design standards.

The Applicant's proposed use of Mountain Ridge as a Private Road, 3800 feet to the intersection of Circle R Road (as indicated in the Tentative Master Map) along with increasing the average daily trips at the intersection more than two orders of magnitude, is another major safety concern. There is an extremely limited sight line at this intersection. At the level of traffic the Applicant is proposing, extensive off site improvements to Circle R Road and addition of a traffic signal or similar controls are likely required. Again, the Applicant has not provided for these measures in his design.

The Applicant's proposed 500-foot transit of Lilac Hills Ranch Road across APN 128-290-78-00 and intersecting Covey Lane (See page III-6 of the Specific Plan) and the increase in average daily trips at the intersection by more than three orders of magnitude is a major safety issue. There is less than a 100-foot sight line at this intersection. At the level of traffic the Applicant is proposing, extensive off site improvements to the existing Covey Lane Private Road and addition of a traffic signal or similar controls are required, unless the Applicant is proposing an elevated bridge.

The use of traffic circles (at these dimensions and traffic volumes the Institute of Traffic Engineering defines these as Traffic Circles, not "Roundabouts") to merge the Applicant's proposed "New West Lilac Road" with the existing West Lilac Road as indicated in the Tentative Master Map appears more driven by the desire to minimize the amount of land dedicated to public road use and the avoidance of the non-recurring and recurring cost of traffic signals than it does with public safety. There is a safety concern with this proposed use of traffic circles because of the lack of information and experience and documented safety data for similar designs in San Diego County. The Valley Center Community Planning Groups asks that the County perform Safety and Traffic Load analyses of these Traffic Circles as designed and release the results to the Public for review at the earliest possible date. In fact, the Valley Center Community Planning Group requests that the County perform Safety and Traffic Load analyses on all of these safety concerns and share them with the public at the earliest possible date.

*Legal Rights for Private and Public Road Easements.*

On February 7, 2011, the County issued the Applicant the following instructions regarding Easements in the Pre Application Scoping Letter MPA 10-25:

**4. Off-Site Grading for Public and/or Private Road Improvements**

To allow for public and/or private improvements for areas outside the boundary of this subdivision along Interstate 15, Old Highway 395, West Lilac Road, proposed Mobility Element Road 3A, Birdsong Drive, Covey Lane, Mountain Ridge Road, Nelson Way, Rodriguez Road, and other roads in the vicinity of the project site, the following shall be completed:

It is the applicant's responsibility to provide suitable evidence that offsite improvements including grading, dedications, grants (if any), and easements can be accomplished without resorting to County of San Diego assistance. This evidence can be provided in several forms (provide a letter of explanation with the below forms) used:

- A Title Report showing applicant has the right to construct improvements along with a Title Company Guarantee (\$20,000) acknowledging those rights;
- Recorded Grant Deed or Recorded Right To Purchase for the area where improvements are to be constructed;
- Other evidence satisfactory to the County that clearly shows an existing and continuing right to construct the required improvements.

The applicant's evidence must also show the ability to have any existing utility easements subordinated to the new Public Easement (if any) as per County Subdivision Ordinance. The foregoing must be accomplished to the satisfaction of DPLU and DPW prior to DPW writing final requirements for this project.

Provide a Map, to Engineer's scale, which clearly indicates any off-site road Easements/Dedications/Letters of Permission to Grade/Improve to be acquired, existing I.O.D.s, existing Public Road Easements, etc. Letters of Permission to Grade/Improve must be notarized. Please note that existing off-site road easements may need to be expanded to accommodate road widening required by the project. The ultimate right-of-way width required would be determined through the results of a traffic study.

A coalition of concerned property owners and a surveyor retained by the property owners have done extensive research into road easements asserted by the Applicant in the Specific Plan (SP) and Master Tentative Master Map (TM).

In the Master Tentative Master Map, we believe that the Applicant has placed Roads in locations for which he has no Legal Rights. Those roads are:

1) *Mountain Ridge Private Road.* On Sheet 8 of the Temporary Map and in the Specific Plan, the Applicant has indicated the implementation of future road improvements and use of Mountain Ridge as a private road for purposes of traffic circulation for his Development. On Sheet 2 "Existing Easements" and Sheet 3 "Easement Notes", the Applicant has referenced no road easements for use of Mountain Ridge beyond the boundaries of his proposed subdivision. Detailed analysis of the Title for APN's 129-300-09 and 129-300-10 has indicated that there are no Easements for usage of Mountain Ridge from the proposed Subdivision Boundary and 3800 feet southerly until the intersection with Circle R Road.

The Valley Center Community Planning Group requests that the Department of Planning and Development Services [DPDS] obtain Certified Legal Road Easements from the Applicant for Mountain Ridge consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for public review in the near future.

2) *Six hundred foot Covey Lane west of West Lilac as a public road.* On Sheet 8 of the Tentative Map and in the Specific Plan, the Applicant has indicated the implementation of a future approximate 600-foot Covey Lane Public Road for purposes of connecting West Lilac Road to his proposed Subdivision on APN 129-010-68 of his proposed Subdivision. On Sheet 2 "Existing Easements" and Sheet 3 "Easement Notes", the Applicant makes no claim of an existing Road Easement Right for this location.

3) *Irrevocable Offer to Dedicate.* On Sheet 8 of the Tentative Map and in the Specific Plan text the Applicant refers to an "Existing 30-foot Irrevocable Offer To Dedicate" and indicates moving water meters and fences on APN's 129-010-83 and 129-010-84 which are privately owned and outside the Applicant's proposed Subdivision.

An Irrevocable Offer to Dedicate (IOD) to dedicate 30 feet of road easement was offered to the County and rejected for use August 29, 2000 via Subdivision Map TM 18536. The IOD granted and rejected by the County does not fully connect to the east to West Lilac Road. Additionally this IOD probably conflicts with the Covey Land 40 foot Private Road Easement Agreement 79-539700 recorded December 28, 1979.

Accretive does not have legal rights for the "Covey Lane (Pub) road depicted in Sheet 8 of TM5571 RPL 1. The IOD for an approximate 30 feet of road easement is property of the County and Accretive cannot use these rights without resorting County of San Diego assistance, violating a condition previously imposed on Accretive by the County.

There is no valid IOD for the "COVEY LANE (PUB)" as represented by the Applicant on Sheet 8 of TM 5571 RPL 1. If there is a valid IOD, it would be property of the County of San Diego, not the Applicant.

The Valley Center Community Planning Group requests that the Department of Development and Planning Services obtain Certified Legal Easements from the Applicant that enable the 600-foot Covey Lane Public Road consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for public review in the near future.

4) *Covey Lane Private Road Easement.* Extensive research has concluded that the 40-foot Private Road Easement for Covey Lane was created by Private Road Easement Agreement 79-539700 recorded December 28, 1979, and has not been modified or superseded.

While the Applicant has rights as an "heir or assignee" to this 12/28/79 agreement for properties that he owns, there are eleven other current "heirs and assignees" that would need to grant the Applicant additional rights to use Covey Lane as the Applicant has described in the Specific Plan and represented in the Temporary Map.

Therefore, the Applicant does not have the right to overburden Covey Lane with any traffic from the Applicant's proposed Subdivision, including intersecting Covey Lane with Lilac Hills Ranch

Road as proposed on SP page III-6 Item 2 “Private Roads” b) “Off-site Private Road Improvements” i) “Lilac Hills Ranch Road’.”

The Valley Center Community Planning Group requests that the DPDS obtain Certified Legal Easements from the Applicant for Covey Lane Private Road consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for Public review in the near future.

5) Rodriguez Road – Property Owners have not yet done an assessment of Easement Rights asserted by the Applicant on the Rodriguez Private Road.

The Valley Center Community Planning Group (VCCPG) requests that the DPDS obtain Certified Legal Easements from the Applicant for the Applicant’s intended use of Rodriguez Road (Private) consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for Public review in the near future.

## **Compliance with the General Plan**

The San Diego County General Plan is based on 10 guiding principles. It is difficult to understand why the Lilac Hills Ranch is receiving such serious consideration when it appears to violate each of them. The 10 are:

## **Guiding Principles**

The General Plan maps, goals and policies, and implementation programs are based on a set of ten interrelated principles that provide guidance for accommodating future growth while retaining or enhancing the County’s rural character, its economy, its environmental resources, and its unique communities. The ten Guiding Principles are:

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
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.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region’s economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

To anyone who has carefully read the Accretive submission, it appears that they have designed a project that would violate each of these ten principles. Their Specific Plan only purports to address and show consistency with the goals of the General Plan. The project is not located near existing or planned infrastructure, services and jobs in a compact pattern of development (#2). The proposed project is compact only in the sense that 1746 units are compressed into a 608 acre project site which is presently zoned for around 110 units.

The Project certainly does not reinforce the vitality and individual character of the existing community (#3) in the area the proponent has selected. The west of Valley Center is and has long been an area of agriculture and rural homes. The building of schools and homes would take away those uses. The aerial spraying that often accompanies and is necessary for robust plant growth would have to stop if confronted with dense residential development.

The Lilac Hills Ranch Specific Plan does not promote environmental stewardship that protects the natural resources of the region nor ensure that development accounts for the physical constraints of the land. (# 4 and 5). The Project will move 4.4 million cubic yards of earth on a 608-acre site destroying land contours and natural resources and not respecting the physical constraints of the land. Cutting and filling, on average, one and a half cubic yards of earth for every square yard of the project's surface is not a recipe for the Applicant to "integrate, maintain, or preserve" the major physical features of the site nor "preserve natural resources...and enhance connectivity to community development patterns". The results will be to completely disturb and reshape the landscape to suit the high density of housing proposed leaving only narrow corridors for wildlife transit and connectivity.

There is no multi-modal transportation network that enhances connectivity. The project will require its residents to commute to jobs in San Diego or Temecula thereby adding to Greenhouse gases. (#6 and 7) The commercial areas of the development will generate only a small number of low-paying retail jobs and even fewer relatively low-paying senior health/maintenance jobs. Few, if any, of these jobs would be capable of supporting a mortgage on the housing the applicant proposes to build. There will be increased daily trips for these workers as they travel to and from their homes and for residents of Lilac Hills Ranch as they commute to employment centers in Escondido, Temecula, Vista, and Oceanside. The 75,000 square feet of commercial mixed-use space will not provide the array of services and retail opportunities required by a Del Mar-sized town of over 5000 residents. And, that makes this project one that distinctly does not encourage "non-automobile mobility."

The Project certainly will not preserve agriculture having selected as its site one of the richest agricultural regions of Valley Center nor will it minimize public costs of infrastructure and services. (# 8 and 9). Although the Applicant claims in the Specific Plan to have "worked" collaboratively with the Valley Center Community and in fact that "the project was extensively redesigned in response to the comments and issues raised during the meetings and workshops held over the past several years", this is simply not so. To the contrary the applicant has cherry picked supporters and held "private" meetings while specifically excluding those who question the project, some of whom are the community's elected officials. (#10)

The Lilac Ranch Specific Plan raises major questions about the extent to which the County of San Diego values and is prepared to defend its General Plan, 2011.

## **Services and Infrastructure (Water, Schools, Fire, Waste Treatment**

Lilac Ranch will require virtually all new infrastructure. We have considered roads at considerable length and noted the problems associated with them. Much the same picture applies to schools, water, fire protection and waste treatment.

*Schools.* It is unclear where students who live in Lilac Ranch will attend school. The Specific Plan notes that there will be an 11.2-acre site on which to build a K-8 school. Despite the claims made by the applicant, there is no Project Facility Availability Form from Valley Center-Pauma Unified School District, Bonsall Union School District, or Fallbrook Union School District attached to the Specific Plan. There is no indication of support from any district for the suggestions made in the Specific Plan.

If a new school was built, none of the three districts has indicated interest in managing the new facility on the Project site. Valley Center-Pauma USD has one school that is presently vacant and so, certainly, adding a remote school site to Valley Center-Pauma would constitute a substantial and unnecessary expense for that school district.

If no school is built in Lilac Ranch Hills, students would either be bussed or transported by parent to existing schools, not only for grades K-8 but also for grades 9-12. Such an arrangement would have an impact on district bussing costs. It would also impact traffic flows through the Valley Center and Bonsall/Fallbrook areas and must be addressed in the traffic study for the Project. It appears that a new school in the project is not sought by any of the neighboring school districts but it would serve to reduce trips across roads ill equipped to handle them. As in other aspects of the project, exactly how primary education will be managed remains unclear and likewise the impacts associated with moving students to schools in nearby communities are undefined.

*Fire.* The Lilac Hills Ranch Fire Protection Plan relies on the Deer Springs Fire Protection District (DSFPD) and CALFIRE to provide fire protection. According to the DSFPD Project Facility Availability Form in the Appendix of the Specific Plan, there is no fire protection available for the Project for the next five years (the length of time for consideration called out by the form). Further, the applicant has measured the emergency response times from the CALFIRE Miller Station adjacent to the Project. However, that station is seasonally manned and does not have assigned paramedic units. DSFPD says the correct primary response station is Station 2 on Circle R Road which is five miles distant from the primary entrance to the Project, making emergency response considerably longer than the time required by law.

*Water and Waste Water.*<sup>1</sup> The Applicant suggests that the Valley Center Municipal Water District (VCMWD) is able to serve the Project but mentions none of the conditions or limitations contained in the Project Facility Availability Form in the Appendix of the Specific Plan. They cited several conditions that are not specifically addressed in the Specific Plan. The applicant continues to suggest that recycling wastewater for use irrigating landscaping is only a goal but VCMWD has said it is a requirement. The Plan should acknowledge this requirement. The applicant says the Project will supplement recycled water with well water, claiming that 90% of the neighboring properties don't use well water since they are served by VCMWD. However, those neighboring property owners may be using well water as a supplementary source for irrigation of agricultural crops just as the applicant proposes.

Since the Valley Center Municipal Water District (VCMWD) has indicated that it does not have the facilities near the site to serve the project within the next five years (see Specific Plan

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<sup>1</sup> The Valley Center Planning Group was notified 22 Oct 2012, that the Valley Center Municipal Water District voted to provide water to the proposed Lilac Hills Ranch project pursuant to the conditions listed in their Project Facility Availability form.

Appendix, Project Facility Availability Form – Water), the applicant will have to build new pipelines, treatment and recycling facilities to serve the Project. While LEED 2009-ND allows for such construction, the intention of the standard is to allow it in urban infill areas to extend existing infrastructure. In this case, the new construction is being proposed for a green field, rural agricultural area, which is expressly discouraged by LEED 2009-ND.

Again in this section of the Specific Plan the applicant continues to use equivocating language that suggests recycling of wastewater for onsite irrigation "...could possibly then be used to irrigate all of the common areas, front and rear yards of residential homes and potentially be available as a backup water supply system in the event of major fires." The question becomes, will it happen or not? The language suggests, at the very least, there is much uncertainty whether or not such a system will be in place. However, VCWMD has said it must be in place in order to meet the water demands of the Project.

The Project will not build a wastewater treatment plant during the initial phases of development. The initial proposal was that wastewater would be collected and trucked to an offsite facility for treatment, making it unavailable for use as irrigation water. This procedure would have added numerous daily trips to and from the Project, trips which could go on for a lengthy but undetermined period. The most recently revised map now proposes installing a temporary 26,000 foot (5 miles) four inch (4") force main sewer line where effluent will be pumped from a temporary pumping station in Phase I. The temporary force main will be buried two to three feet below current grade, transiting from Phase I, southerly through the project, across Mountain Ridge and then down Circle R to the Moosa Canyon treatment plant. There is a significant risk to sensitive habitat and streams if there is a break or rupture in the line. The Waste water Treatment Plant and Recycling Facility is currently planned for construction in phase 3. To avoid environmental damage, phase three, or at least the Water Treatment Plant and Recycling Facility should be moved up the priority list for construction.

There are other facilities and services that Lilac Hills Ranch will require—recycling, emergency medical services to name but two--but the pattern of problems is the same. Public agencies are unable to provide the required service within the foreseeable future and the Project is unclear about how it will proceed under the conditions that the Project confronts. These problems are not unexpected in a project that seeks to create so many facilities and services on such a large scale.

### **Leeds and Sustainable/Walkable communities.**

It is necessary for the Lilac Hills Ranch project to argue that they are at least potentially able to qualify for LEEDS certification in order to avoid the General Plan prohibition on Leapfrog Development. The project, placed as it is, miles from the heart of Valley Center, violates General Plan Guiding Principle 2 and General Plan Policy L-1, which defines and governs Leapfrog Development. Leapfrog Development is defined as Village densities located away from established Villages or outside established water and service boundaries.

Leapfrog Development standards 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. The LEEDS-ND 2009 standards are important for Lilac Hills to reach so that it will not be considered (and prohibited) as leapfrog development. The criteria for LEEDS certification are as follows:

• **LEED 2009 for ND Project Checklist:**

Prerequisite 1- Smart Location

Prerequisite 2- Imperiled Species and Ecological Communities

Prerequisite 3 - Wetland and Water Body Conservation

Prerequisite 4- Agricultural Land Conservation

Prerequisite 5- Flood Plain Avoidance

Preferred Locations 10 pts

Locations with Reduced Automobile Dependence 7 pts

Housing and Job Proximity 3 pts

Steep Slope Protection 1 pts

Site Design for Habitat or Wetland and Water Body Conservation 1 pt

Long-term Conservation Management of Habitat or Wetlands/ Water Bodies 1 pt

The LEED 2009 for Neighborhood Development web-site says, " *This rating system is designed primarily for the planning and development of new green neighborhoods, whether infill sites or new developments proximate to diverse uses or adjacent to connected and previously developed land. Many infill projects near transit will be in urban areas, which help direct growth into places with existing infrastructure and amenities.*

It is clear from this list of standards and explanation that Lilac Hills Ranch is not truly designed with any of them in mind. Their Specific Plan does claim to be LEED 2009-ND compliant but fails to meet the prerequisites for the first 5 categories of compliance. The quote from the LEED 2009 Neighborhood Development Rating System suggests that the applicant does not understand the requirements for a LEED 2009-ND project. The Smart Location and Linkage prerequisites include smart location, avoidance of imperiled species and ecological communities, wetland and water body conservation, agricultural land conservation and flood plain avoidance. This project fails to meet four of the five prerequisites for a green LEED 2009-ND project. Regardless of how much the new construction addresses green processes and materials, it fails to meet the basic location requirements.

With regard to the structure of neighborhoods, Leeds guidelines say, " *The neighborhood, as laid out in LEED-ND, is in contrast to sprawl development patterns, which create pod-like clusters that are disconnected from surrounding areas.*" The Lilac Hills Ranch Project is characteristic of sprawl development by being proposed for current agricultural lands, making extensive grading alterations that will disturb both agriculture and wildlife, and impinging on wetlands with roads and urban runoff. It's one achieved prerequisite is that it is not proposed for a flood plain. The three pod-like "neighborhoods" of the Project are barely connected in terms of distance and boundaries. Questions regarding roads and transit access make the claim for smart location even harder for this Project to achieve. The Project site is not a preferred location under the evaluation criteria. Many of the other claims for compliance with LEED ND requirements are misinterpreted or incorrect.

The guidelines continue, " *This compact form of development will locate housing close to retail, services, schools, and jobs, allowing for the preservation of an increased amount of open space, natural habitat and agriculture that will contribute to the retention of the rural setting and lifestyle of the adjacent community.*" The footprint of the Lilac Hills Ranch project is not compact by any measure. And, rather than preserving more open space, it is doing the opposite by proposing to build with urban density on existing green field agricultural and low density residential land. And, thereby, destroying open-space and the rural setting and lifestyle that it purports to preserve.

The goal of a mixed-use pedestrian-oriented sustainable community is defeated from the start by the stretched, amoebic shape of the Project which extends from north to south for over two miles and from east to west for over three quarters of a mile. Further, the Project is nearly severed near the middle by properties not included in the Project. This shape drives the developer to make three “community nodes” to claim walkability distances of the recommended half mile radius. However, taken together, the Project inhabitants will have to walk well over a mile to get from end to end of the Project. The three commercial nodes for a walkable community would not be necessary if the project area was more regular and compact rather than stretched out and discontinuous.

The two smaller commercial “neighborhood centers” seem intended to address the ‘walkability’ requirement of the LEED 2009-ND standards. However, neither of these centers will be adequate to satisfy the needs of prospective residents, requiring them to travel, likely by car, to other stores most likely outside the project to a distant commercial zone

The claim that Lilac Ranch Hills augments the area adjacent to I-15 is incorrect. This Project will supplant an existing agricultural/rural residential low-density usage with a high-density, urban pod development that relates to nothing surrounding it. The commercial/mixed use areas will not provide enough employment or the quality of employment needed by residents to significantly reduce average daily trips. Neither will those commercial areas significantly reduce trips for residents outside of the Project because there will not be the diversity of services needed to accomplish that goal. In the end, this Project fails to balance population, housing needs, open space, agriculture and infrastructure because it attempts to create an isolated urban project with an outsized population density compared to the area now, with only a shadow of an acknowledgement of the present agricultural and open space uses.

There are no circumstances under which the presently proposed project can successfully “incorporate and encourage low impact development and sustainable practices” at the proposed Project site. At every turn, this Project will have tremendous impacts on the current and planned Lilac Triangle agriculture and rural residential uses because its proposed urban structure is inherently incompatible with present uses and development patterns.

The applicant refuses to acknowledge those impacts and instead wants to mitigate them by offering up token patches of orchard and remnant strips of open space. To accomplish this urbanization of the Lilac Triangle, will require the applicant to install urban services onsite, none of which fulfill the intent of low impact and sustainable development practices. *The applicant is planning to build the entire infrastructure needed to support such a large and dense project because none of it presently exists*, a condition that runs counter to the requirements of LEED 2009-ND and virtually all other serious green and sustainable building standards. Those are standards the San Diego County General Plan purports to support. Recycling centers, schools, recreational facilities, roads, and utilities are all the sorts of infrastructure that exist in the County’s incorporated cities and are desirable for the kind of infill development that this Project should be. To build new infrastructure for this kind of Project defeats the entire concept of green and sustainable development and makes a mockery of County support for green and sustainable development.

## **Agriculture**

The Project calls the Lilac Triangle an area of “historical agricultural activities” but the chart presented below indicates that Agriculture is flourishing in the area today. The Britsch cactus farm ships rare specimens all over the world and provides high-grade cactus to numerous retail operations. Archie’s Acres produces organic produce and trains returning veterans, many of whom have Traumatic Stress Disorder, in organic and hydroponic techniques that provide both therapy and a means of useful employment. Citrus, avocados, tropical plants, proteas and eucalyptus, palms, tangerines, flowers, pomegranates, and orchids all flourish in the area.

Modern technology could enhance agriculture here as well. The remoteness of the area lends itself to solar arrays and wind generation, both quite compatible uses in agricultural area. Grapes for wine—a new industry in Valley Center—could also thrive on the hills and steep slopes of this area.

Without question, it is the intention of the Valley Center Community and the Valley Center Community Planning Group that the rugged, remote and fire prone areas in its western areas should remain as large parcels in agriculture while the core of the town—represented by the North and South Villages—should accept planned development and services.

Lilac Ranch Hills will not augment the area adjacent to I-15. This Project will supplant an existing agricultural and rural residential low-density usage with a high-density, urban pod development that relates to nothing surrounding it. It will have tremendous impacts on current and planned Lilac Triangle agriculture and rural residential uses because its proposed urban structure is inherently incompatible with present uses and development patterns. Why should area farmers give up their livelihood to allow a high density, high impact project? Why should taxpayers support the creation of new infrastructure built almost from scratch that destroys the areas natural features?

The map below, painstakingly created by a Valley Center resident marks with pink and yellow flags many of the areas of active agriculture in and in the immediate vicinity of the Lilac Hills Ranch project, There are more than 100 of them that range from small family businesses to major commercial agricultural enterprises. Following the map is a list the growers currently active in the area of Lilac Hills Ranch



Location	Agricultural Product	Owner/Business Name
1	Cactus	Britsch - Western Cactus
2	Avocados	Purdy
3	Lemons/Avocados	Covey Farms
4	Avocados	Accretive
5	Figs	Padilla Guadalupe
6	Cactus	Richard Thompson
7	Avocados	Accretive
8	JR Organic Farms (Produce)	Accretive
9	Flowers	
10	Avocados	
11	Proteas	Accretive
12	Worm Castings	
13	Flowers	LaChapelle
14	Avocados & Palms	
15	Wholesale Nursery & Green Houses	
16	Flowers	
17	Avocados	
18	Cactus	Far West
19	Cactus & greenhouses	Altman Plants
20	Avocado Groves (very large grove)	
21	Avocados & citrus	
22	Avocados (Calavo growers)	
23	Avocados	
24	Cactus & succulents	
25	Tropical Plants	Ben's Subtropicals
26	Proteas & Eucalyptus	
27	Greenhouse - succulents	
28	Flowers	
29	Avocados & citrus	
30	Organic Produce & Hydroponic G.H.	Archies Acres Farms
31	avocado	
32	palms (shade cloth greenhouses	
33	avocado/citrus	
34	citrus	
35	king palms	
36	avocados	
37	avocados	
38	succulents & green houses	
39	tangerines	
40	avocados	
41	citrus	
42	avocados	
43	avocados	
44	flowers	
45	JR Organic Farms (Produce)	
46	greenhouses	
47	avocado, citrus & flowers	

48	avocados	
49	avocados & kiwis	
50	avocados	
51	avocados	
52	avocados	
53	produce	
54	flowers	
55	avocados	
56	flowers	
57	produce	
58	avocados	
59	avocados	
60	avocados	Kamp Kuper Youth Retreat Ctr.
61	avocados	
62	pomegranates/avocados	
63	cactus/green houses	
64	Avocados/pomegranates/ loquats	
65	avocados	
66	avocados	
67	pomegranates	
68	palm nursery	
69	avocados	
70	avocados	
71	Wholesale Nursery	
72	Palm Nursery	
73	Eucalyptus	
74	avocados	
75	avocados	
76	avocados	
77	palm nursery	
78	green houses	Euro American
79	avocados	
80	avocados	
81	avocados	
82	avocados	
83	palm/cactus/ornamentals	Poncianos nursery
84	avocados	
85	avocados	
86	avocados	
87	avocados	
88	avocados	
89	avocados	
90	avocados	
91	avocados	
92	avocados	
93	quarry (rocks)	
94	avocados	
95	palm nursery	
96	orchids	Reids Orchids
97	flowers	
98	citrus	
99	citrus	

100	avocados	
101	Sunnataran Residence	Retreat

## Twists of meaning and lack of clarity in the plan

As is apparent from what has already been presented, The Lilac Hills Ranch plan is not what it purports to be. Arguments the plan advances seem to assume that making an assertion gives it truth. They talk about “sustainability”, environmental sensitivity, being compatible with the surrounding community, preserving significant portions of the existing on site resources, being a LEEDS-ND community, being compatible with the San Diego County General Plan’s ten guiding principles. Close examination of what they actually intend to do makes it clear that what they say and what is actually planned are quite different.

For example, the Plan says, “*The overall objective is to provide an environmentally sensitive, residential community compatible with the character of the surrounding area while preserving significant portions of the existing on-site sensitive resources, including eighty-five percent of the wetlands in open space easements.*” (See p. 41, II-3) This statement is absurd given the degree to which the applicant intends to modify the environment and character of the area (from agricultural and natural to urban; from rolling hills and steep slopes to artificial contours; from one dwelling unit per 2,4, & 10 acres to as many as 8.8 dwelling units per acre.)

Quoting from the General Plan that “sustainability is a key theme” and making that a goal of the Project merely mouths the words without delivering a design that addresses sustainability for a rural, agricultural site.

They argue that adding 1746 homes and 5,000 residents to a rural back country area will improve traffic and they take as part of their planning for circulation, roads that they have no entitlement to use.

While the material that has been released indicates that there will be 1746 homes, there will also be 200 patient beds in the Assisted Living Facility—which will be *in addition to* the 1746 units. These beds will have a significant impact on traffic because of visitation, staff and deliveries.

They distort their claims when distortion is helpful to the argument. They claim, for example, that the project site is one-half mile from the I-15 without noting that road construction along the route the crow flies is impossible because of a mountainous ridge which would make any road that accessed the I-15 *considerably* longer than ½ mile.

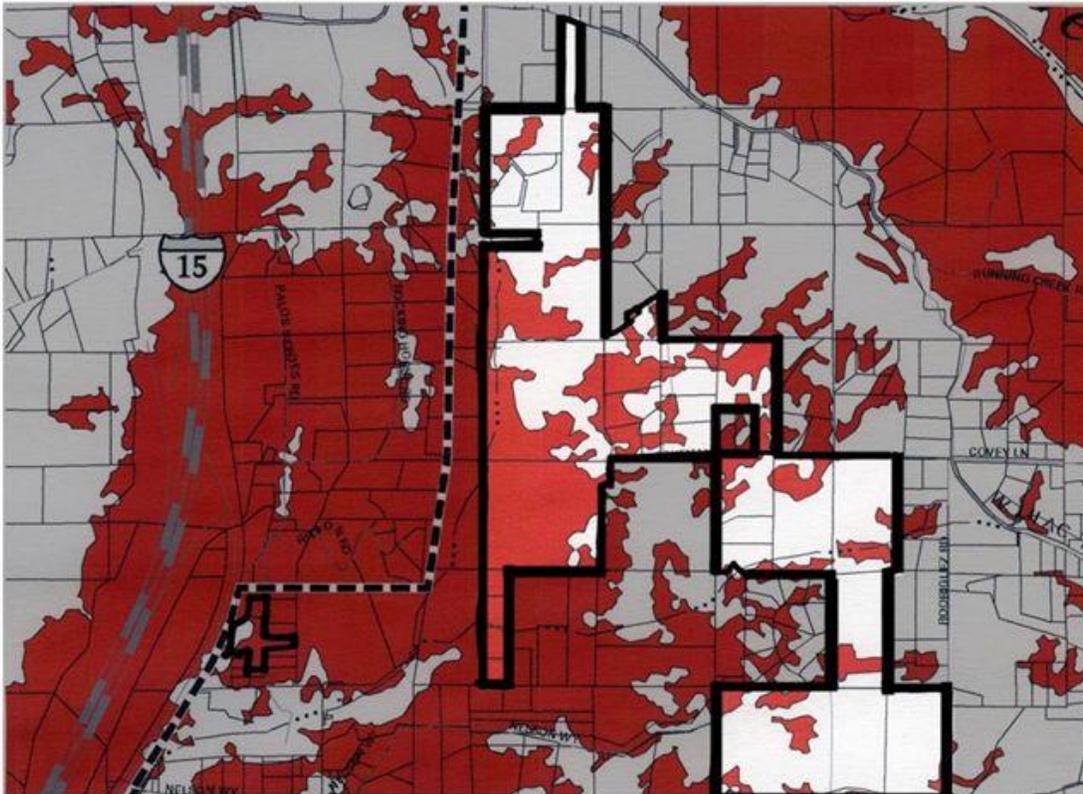
They talk about a “walkable village” when the site spreads over two square miles and requires three retail nodes in order to be even remotely walkable. The applicant has taken the position that such an oddly shaped and sized Project is “compact” and “efficient”. But this is merely the kind of false speak that attempts to misdirect attention from reality

The applicant is planning to build the entire infrastructure needed to support such a large and dense project because none of it presently exists, a condition that runs counter to the requirements of LEED 2009-ND and virtually all other serious green and sustainable building standards. Yet they claim to be LEEDS 2009 ND compliant.

The Project will generate only a small number of low paying retail jobs and the 75,000 square feet of commercial mixed use space will not meet the community's shopping needs. The Project, counter to the assertions of Lilac Ranch Hills planners, distinctly does not encourage non-automobile mobility.

There are also problems with the slope calculations that are contained in the Specific Plan.

• **Land Use Plan** – As can be seen in the slope map below, the



assertion by the applicant that the Project site consists of “gentle topography” and that “97.6% of the property is less than 25 percent slope per the Resource Protection Ordinance (RPO) steep slope calculations” is incorrect and must be recalculated by County staff. Slopes that are mapped with 10 foot contours show many fewer 25% slopes than do County Standard slopes and this is exactly what Lilac Hills Ranch Planners have done.

Beyond concerns expressed here about what we have been told, there are issues of concern in the information that has yet to be supplied. We have mentioned the lack of a Traffic study, which is critical to understand the roads, but much else is missing. For example, we have not yet seen a Soils Report. There is the potential for blasting on the site that will last for an undetermined period of time (Will it be 6 days or 6 months?) Given that this area has granite rock, putting substantial amounts of silica into the air has serious health implications. The Soils Report will help determine the impact of moving 4.4 million cubic yards of material. It is important to identify the soil material, understand how it will be distributed, blasted or placed and to determine compliance with County Grading Standards.

How will grading be phased and balanced? Is imported material needed to complete the grading project? If so, what material will be brought to the site and where is it coming from? Letters of permission to grade appear to be identified but not yet obtained, which means final grading and impacts on adjoining properties have not yet been identified and it is difficult to determine if changes will need to be made to the plans. We ask the applicant to provide grading plans to show finished grade elevations.

What is the life of the temporary sewer pump station and the end date of its use? Due to phasing, it is possible that the temporary sewer pump station and force main could be in place for years before a permanent facility is brought on-line and the temporary line removed. The Force Main sewer line is approximately 26,000 feet (5 miles) at a depth of 2 to 3 feet below existing grade. How does this relate to phased grading? How does this relate to open spaces and other sensitive areas etc.? The Valley Center Community Planning Groups asks that the County provide construction plans for the force main sewer line.

When will Sewer Treatment Facilities be built and in what phases? (Typically all must be installed and operating with finished roads before homes can be built). Answers to these concerns are important in that the force main could be in place for years before building a treatment facility. We should be able to see that treatment plant will be built in an appropriate phase and time.

How will migratory corridors be maintained? Please identify blue line streams, vernal pools and habitat.

Because of the Porter – Cologne Act (California State Water Control Protection Act) we are requesting the SWPPP (Storm Water Pollution Prevention Program) plan and an explanation of how it relates to all phases of development. We would also like to see plans for compliance with the Porter-Cologne Act, NPDES (National Pollution Discharge Elimination System), RWQCB, AQMD and SWPPP.

Please provide both wet and dry utility plans along with offsite and onsite plans and identify wells that will be used in conjunction with the wet utility plan.

### Conclusion

This is the wrong location for this many homes.

It will create an urban traffic gridlock area. It will destroy agriculture and sensitive ecological habitats. It borders rural lands and is within 1 ½ miles of the Rancho Lilac Conservation Area recently purchased by the state of California for Habitat Destruction Mitigation.

The cost of providing infrastructure in this remote region with challenging topography is economically infeasible for the developer. In order for this development to proceed, it will require large public subsidies in the form of county sponsored long-term financing, infrastructure financing districts (IFD) or assessment districts (AD). These financing methods shift the cost of direct development impact to other area residents or to the county at large.

On page IV-12, Item 3 of the Specific Plan the applicant makes the statement that no one outside the development will pay for Lilac Hills Ranch infrastructure improvements. The applicant then enumerates an itemized request in Table 8 for a very large helping of public

subsidies in this version of the Specific Plan, strongly telegraphing that this development is not economically feasible if the developer has to pay for his direct development impact

The proposed development is not in the best interests of the citizens of San Diego County.

**Appendix A –Road Capacity- SANDAG Mixed Use Trip Generation Model V4 for Average Daily Trip (ADT) Generation**

**Section 3 - Trip Generation**

		Quantity	Units	Trip Equation Method (if applicable)
<b>NOTE: Be sure to enter only occupied units / spaces</b>				
<b>Residential</b>				
	Estate, Urban or Rural Single Family Detached	1400	DU	
	Condominium	346	DU	
	Apartment		DU	
	Mobile Home (Family)		DU	
<b>Retail</b>				
	Super Regional Shopping Center		ksf	Average Rate
	Regional Shopping Center		ksf	Average Rate
	Community Shopping Center	85	ksf	
	Neighborhood Shopping Center		ksf	
	Specialty Retail / Strip Commercial	0	ksf	
	Supermarket		ksf	
	Drugstore		ksf	
	Bank with Drive-Thru		ksf	
	Discount Store		ksf	
<b>Restaurant</b>				
	Quality Sit-down, High Turnover	0	ksf	
	Fast Food (With Drive-thru)		ksf	
	Fast Food (Without Drive-thru)	0	ksf	
	Delicatessen (7 AM - 4 PM)		ksf	
<b>Office</b>				
	Standard Commercial Office	0	ksf	Fitted Curve
	Large Commercial Office		ksf	Fitted Curve
	Office Park		ksf	
	Single Tenant Office		ksf	
	Corporate Headquarters		ksf	
	Government (Civic Center)		ksf	
	Post Office (Community, w/mail drop lane)		ksf	
	Medical-Dental		ksf	
<b>Industrial</b>				
	Industrial / Business Park (with commercial)		ksf	
	Industrial / Business Park (no commercial)		ksf	
	Industrial Plant		ksf	
	Manufacturing		ksf	
	Warehousing		ksf	
	Storage		ksf	
	Science Research & Development		ksf	
<b>Lodging</b>				
	Hotel (w/convention facilities, restaurant)	20	Occ. Room	

	Motel		Occ. Room
	Resort Hotel		Occ. Room
<b>Misc. Uses</b>			
	Movie Theater	0	seat
	Religious Facility	7.5	ksf
	Gas Station (w/Food Mart and Car Wash)		Pump
	Hospital	20	Bed
	Convalescent / Nursing Facility	200	Bed
	Library		ksf
	Park (developed with meeting rooms and sports facilities)	25.5	acre
	Transit Station (Light Rail with Parking)		occupied pkg space
	Park & Ride Lot		occupied pkg space
<b>Education</b>			
	University	210	Student
	Junior College	125	Student
	High School	349	Student
	Middle / Junior High	165	Student
	Elementary	708	Student
	Day Care		Student

	Daily	AM Peak Hour	PM Peak Hour
<b>Trips from Land uses not covered above ==&gt;</b>	2860		0
<b>Jobs in those Land Uses</b>	0		0

	Daily	AM Peak Hour	PM Peak Hour
<b>Total "Raw" SANDAG Trip Generation Trips</b>	<b>31,442</b>	<b>2,460</b>	<b>2,802</b>