

Valley Center Community Planning Group

Minutes of the August 12, 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 PDS=Department of Planning & Development Services IAW=In Accordance With 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 September 2013

Approved: 12 August 2013

| A | | Call to Order and Roll Call by Seat #: | | | | | | | | 7:08 PM | | | | |
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| 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 | | 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 | A | P | P | P | | P | P | P | P | P | P |

Notes:

Quorum Established: 13 present

B Pledge of Allegiance

C Approval of Minutes:

Motion: Move to approve the minutes of July 8, 2013 as corrected

Maker/Second: Glavinic/Quinley **Carries/Fails (Y-N-A):** **Voice12-0-1**; Evans Abstains- not in attendance in July

D Open Forum:

None

E Action Items [VCCPG advisory vote may be taken on the following items]:

E1 Discussion and possible vote on memo reminding the County Staff that as Lilac Ranch becomes open space rather than a SPA, Valley Center still needs to have an additional East West Road on the General Plan to allow better access into and out of the community, especially in the event of fire or other emergency. (Smith and Glavinic)

Discussion: Continued

E2 Introduction of candidates for vacant Seat # 9 on the VCCPG. If there are insufficient candidates, discussion and vote on extending the application period. The seat expires December 31, 2016. (Britsch)

Discussion:

No candidates have applied.

Motion: Move to extend application period for another month.

Maker/Second: Quinley/Laventure

Carries/Fails: [Y-N-A] **13-0-0 Voice**

E3 PDS2013-MUP-03-118W2; ATT Wireless-Lake Wohlford (SD0675) located at 26725 Lake Wohlford Road at Meamar Drive; Owner is Higgason, John D Trust c/o Terry Hutchison at 16809 Mount Fletcher Circle, Fountain Valley, CA 92708. Applicant is AT&T Wireless at wcastanares@5CProfessionals.com; Contact person is Franklin Orozco at forozco@interlinkpg.com. Major use permit modification to allow the replacement of a wireless telecommunication facility currently mounted to a utility pole. The proposed facility will consist of 12 panel antennas mounted to a new faux broadleaf tree with associated equipment with a concrete masonry block enclosure with a trellis top.

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| Requests a 45' height where limit is 35'. (Norwood-Johnson) | |
| Discussion: Norwood-Johnson presents. Franklin Orozco, applicant representative, is introduced. Norwood-Johnson neither received nor found any neighbor objections. She says it is not in character with the surrounding area. Orozco explains how the project will change the existing condition by removing the antennas from a utility pole and replacing the pole with a 40' mono-pole broad-leaf faux tree. Vick asks if applicant will landscape the project and if the project will have water from the property on which it is built? Orozco says, yes. The support equipment will be enclosed in a new enclosure. Smith asks about height of tree compared to pole. Orozco says they are equivalent, a 40-foot pole and tree. Glavinic asks about fans in the enclosure, which would make noise. Orozco says noise would be minimized by the enclosure. | |
| Motion: Move to approve the project with the conditions imposed by the County. | |
| Maker/Second: Norwood-Johnson/Laventure | |
| Carries/Fails: [Y-N-A] 13-0-0 Voice | |
| E4 | PDS2013-AD-13-024. LeBlanc AD for Oversized garage/workshop; project address is 14637 Tyler Road at Cole Grade Road; Owner is Mike LeBlanc at 760-715-6069; contact person is William Bucher at 619-316-3563. The owner, who built the structure without a permit, is applying for an Administrative Permit. (Jon Vick). |
| Discussion: Vick presents request for VCCPG support for an administrative permit for an oversize garage. Vick spoke to the County planner who said the structure could be 1800 sq. ft. by right. No initial permit was granted for construction. The structure is too close to the original property boundary, but boundary adjustments have been made. Mike Leblanc, applicant, explains the boundary adjustment he obtained from his neighbor to accommodate his request. Rudolf asks about findings, and although Vick could not recite them, he assured Rudolf that the County's planner said the requirements could be met. Glavinic asks about the structure's potential use as a dwelling unit. Vick replies that there is no water in the project. No kitchen or bath is included. | |
| Motion: Move to support applicant for administrative permit, subject to all the requirements of County | |
| Maker/Second: Vick/Norwood-Johnson | |
| Carries/Fails [Y-N-A]: 13-0-0 Voice | |
| E5 | Discussion and vote on report from Lilac Hills Ranch [LHR] Subcommittee on the DEIR submitted by the Accretive project. Also, motion, discussion and possible vote on an additional regular meeting on August 16, 2013 for the presentation of a further analysis by the subcommittee. Finally discussion and vote on reimbursing copying costs associated with distributing the report to subcommittee members and others. (Steve Hutchison). |
| Discussion: Hutchison reviews the contents of the Executive Summary of the proposed 250+ page response package [see attached below]. Rudolf compliments the efforts of the SC and derides the notion presented in the Draft Environmental Impact Report [DEIR] that General Plan consistency and community-splitting effects of the project are less than significant. He speaks to the leapfrog development aspects of the project and the requirements of Leadership in Energy and Environmental Design – Neighborhood Development [LEED-ND] prerequisites. He is pleased with the discovery of strict LEED-ND requirements. He cites the maximum size of a LEED-ND project as 320-acres or less. Bret Davis asks about the proportion of the project in VC. Hutchison responds that a significant majority of the project is in the VC planning area. Bret Davis asks if there is a precedent for this type of development. Rudolf says, yes, because leapfrog development has been the rule within the County. Glavinic cites the San Elijo Hills project as an example. Glavinic comments that he wants transparency, and he noted that his specific comments were not being included in the SC report. He notes a lack of completeness in the response package being presented for approval. He cites traffic as not being included. He cites the DEIR's Chin and Ryan traffic report as being inadequate and deserving of a negative comment. He says that with or without Road 3, it makes no difference; the traffic report's conclusions are in error. He says the project exacerbates broader regional traffic issues, but those issues are not addressed in the DEIR. He says he will send an individual report addressing traffic/mobility issues. Rudolf notes items already in the proposed response that address traffic related issues and the fact that other bona fide traffic engineers are | |

evaluating traffic issues generated by the project. Glavinic excoriates the County for not doing an effective evaluation. Patsy Fritz, audience, explains why LHR was not in the General Plan. She says in 2006 BOS asked PDS to study the number of Equivalent Dwelling Units needed to require the construction of Road 3A. The LHR project was not pipelined [included in the General Plan Amendment being considered then]. She says that Accretive tried an end-run around the General Plan. She asks about the 70-foot slopes mentioned in the executive summary. Hutchison responded that it was an error in the grading map and that none were planned. She asked about Valley Center Municipal Water District [VCMWD] ability to serve the project. VCMWD did state that they could serve the project once certain conditions were met. Vick says the proposed DEIR response is a well-written report and fairly describes the situation. Quinley is appalled at the proposed project. Smith concurs with Quinley. Franck is surprised at the depth of capability on the SC to compose the proposed response. Bob Davis agrees with the notion that this project is self-serving at the expense of the community. Norwood-Johnson says there should be more input from the community, Parks & Recreation, schools, and others. She also agrees with Glavinic on the inadequacy of the traffic study. Rudolf is concerned about trails and will submit additional comments beyond those of the VCCPG. He asks for unanimous vote of approval for the proposed response package. Smith wants to remove emotion from the response and predicate it on facts. He says that VCCPG has been asked to respond to the DEIR, not criticize the County. The proposed response report shows significant deficiencies in project. The County has professional experts, but volunteer citizens did a remarkable job evaluating the DEIR and finding holes in it. Patsy Fritz says she hopes everyone will write individual responses on particular issues. It is important to speak up during the DEIR review or community concerns will not be judged important. She explains the process of evaluating and responding to citizen comments. She says there will likely be litigation on this DEIR.

Motion: Move to accept the recommended response of the SC and forward to the County [with two word substitutions], including the transmittal letter [Executive Summary and transmittal letter attached below]

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| Maker/Second: Hutchison/Rudolf | | | | | | | | Carries/Fails: 11-1-1 [Y-N-A] | | | | | | |
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| Y | Y | Y | N | | Y | Y | Y | | Y | Y | R | Y | Y | Y |

Notes: Jackson recuses because of proximity of his property to the project

Motion: Move to reimburse Hutchison for copying costs related to subcommittee review activities

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| Maker/Second: Quinley/Glavinic | | | | | | | | Carries/Fails: 11-0-1 [Y-N-A] | | | | | | |
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| E6 | Discussion and vote on a memo to the county regarding improvements needed for Lilac Road/Old Castle Road. (Smith and Bob Davis). | | | | | | | | | | | | | |
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Discussion: Bob Davis, chairperson of Mobility Subcommittee, presents two proposed letters, regarding Road 3 through Lilac Ranch and repairs to Lilac/Old Castle Roads. Jackson has been exploring new road development [i.e. Mirar de Valle] with Ed Sprecco of Horn's office.

Motion: Move to approve and forward the letters to Murali Pasumathi and Mark Wardlaw respectively, as they exist, [attached] with substitution of phrases from 'Indian gaming' to 'tribal casino gaming'.

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| Maker/Second: Smith/Quinley | | | | | | | | Carries/Fails [Y-N-A]: 13-0-0 Voice | | | | | | |
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| E7 | Discussion and vote on whether to reappoint Mike McMahon to I-15 DRB or to do a new search. He was appointed in May 2013 and his term expires in September 2013. (Britsch) | | | | | | | | | | | | | |
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Discussion: Little discussion

Motion: Move to re-nominate Mike McMahon for another term on the I-15 DRB

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| Maker/Second: Jackson/Vick | | Carries/Fails [Y-N-A]: 13-0-0 Voice |
| E8 | ABC permit for El Valle Produce; PDS2013-ABC0130002;owners are Alfredo and Claudia Compos; Premise address is 27455 Valley Center Road; The market has established a full convenience market and wishes have a liquor lice | |
| <p>Discussion: Smith says the permit is already granted but he wants to have an opportunity to weigh in. The applicant, Claudia Compos, explains that liquor is not the focus of Market. They want to have a full service convenience market. The permit is conditioned on the store closing at 9 pm and selling only certain wines and beers, no hard liquor or fortified alcoholic beverages. There are also some restrictions on the quantity sold per individual. Smith explains the distribution of liquor licenses in VC. He explains that alcohol is a profitable item for such a store and there is no consumption on site. Restaurants do allow consumption on site. Vick compliments Campos, saying their store has the best vegetables. Glavinic says there may be a proliferation of liquor licenses in North and South villages. He wonders if we should have some direction for these permits going forward. Smith explains that he wanted us to be aware of such requests. Patsy Fritz, audience, asks about the location of the store. Bob Davis notes that licenses are issued by the Department of Alcoholic Beverage Control [ABC] and they have more experience with such regulation. This license restricts sales in a way that is not problematic for the community. He does object to sales of individual serving cans and fortified wines. Franck supports the application and cites competition as a limiting factor for more licenses. Rudolf moves to approve and asks to hear from sheriff on next one.</p> | | |
| <p>Motion: Move to approve the applicant's request for a license to sell alcoholic beverages at their store with the conditions imposed by the County.</p> | | |
| Maker/Second: Rudolf/Bob Davis | | Carries/Fails [Y-N-A]: 13-0-0 Voice |
| F | Planning Group Business | |
| F1 | Announcements & Correspondence Received | |
| <p>a. Department of Public Works to the VCCPG. Notice of Intent to Adopt a Negative Declaration in accordance with CEQA for the Sign and Banners in right-of-way project. The proposal is to amend the provisions in the Definitions and General Regulations sections of the Zoning Ordinance related to Off Premise Signs to allow placement of certain Special Purpose Off-Premise Signs within road right-of-way. The review will conclude on Friday, August 16, 2013.</p> <p>b. DPDS to VCCPG; Weston Town Center; PDS2010-3992-10-014; Project Address is Cole Grade Road and Valley Center Road; APN is 188-230-01; contact person is James Chagala 10324 Meadow Glen Way East; Escondido, CA. The project description is based on the 2010 project and may change depending on the applicant's needs. If it changes, a new project description will be prepared by PDS. The project is a potential GPA, Specific Plan area for a mixed-use town center. Approximately 83 acres of the Weston Town Center would be used for residential development at an average density of 7.10 dwelling units per acre. 529 residential units are planned and 10@ are proposed as duplex residences while 476 would be single family. About 17-acres of open space, park and/or trail areas are proposed. Main access to the commercial portion would be from Indian Creek Road off Valley Center Road. The project may be served by a sewage recycling plant proposed by Valley View Properties and operated by VCMWD. (Quinley)</p> <p>c. DPDS to VCCPG; ABC permit for El Valle Produce; PDS2013-ABC0130002;owners are Alfredo and Claudia Compos; Premise address is 27455 Valley Center Road; The market has established a full convenience marked and wishes have a liquor license so that customers can purchase beer and wine while shopping there. (LaVenture)</p> | | |
| F2 | Discussion of VCCPG member responsibilities for voting on items presented and appropriate instances when abstention from a vote should be considered. (Smith) | |

Discussion: Smith presents the issue of VCCPG members abstaining and the standard that must be met to use abstention. He says that abstaining without proper cause [e.g. conflict of interest or lack of knowledge resulting from an absence] dodges the responsibility to represent the Valley Center community, which is the job we are elected to do. He says we are asked to represent the community view in our recommendations to the County. Our charter requires the vote of a majority of the membership. There are times when abstaining is necessary. However, it shouldn't be used to avoid expressing an opinion. Robert's Rules of Order say that members cannot be forced to vote. But, abstaining, unless there is a conflict of interest, is avoiding responsibility. He then congratulates Lilac Hills Ranch SC for their recent efforts. Smith reviews attendance of VCCPG members for 2013 year to date. He notes that one member, Paul Evans, has had three absences. In such cases, it is necessary for the VCCPG to vote to waive the attendance rule that requires removal upon three absences. He adds that the VCCPG will take such a vote in September.

Motion: None

F3

Updates from each subcommittee chair on current issues and activities within their sub-committee. (Smith)

None except items handled in section E of the Agenda

F4

Next regular meeting scheduled for September 9, 2013

G

Motion to Adjourn

9.42 pm

Maker/Second: Smith/Quinley

Carries/Fails: [Y-N-A] **13-0-0 Voice**

Subcommittees of the VCCPG

- a) Community Plan Update – Richard Rudolf, Chair
- b) Nominations – Hans Britsch, Chair
- c) Northern Village – Ann Quinley, Chair
- d) Parks & Recreation –LaVonne Norwood Johnson, Chair.
- e) Rancho Lilac – Ann Quinley, Chair. - inactive
- f) Southern Village – Jon Vick, Chair
- g) Spanish Trails/Segal Ranch – Mark Jackson, Chair. - inactive
- h) Tribal Liaison – Larry Glavinic, Chair
- i) Website – Robert Davis, Chair:
- j) Lilac Hills Ranch [Accretive] – Steve Hutchison, Chair
- k) Equine Ordinance - Oliver Smith, Chair

Appended items:

Item E5 Transmittal Letter:

12 August 2013

Mark Slovick, Project Manager
 County of San Diego Planning and
 Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

Re: DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001 (GPA),PDS2012-3810-12-001 (SP)

Dear Mr. Slovick:

Attached is a compendium of responses to the Lilac Hills Ranch Draft Environmental Impact Report from the Valley Center Community Planning Group. I am attaching a list of the documents within the compendium for your convenience. Please review and respond to these comments.

Executive Summary

General Plan Consistency

Growth Assessment Valley Center / Bonsall

Project Objectives

Bus Route 388/389 [attachment]

Biological Resources

Cultural Resources

Hazards, Hazardous Materials, Wildfires

Fire & Evacuation

Attachment A – Deer Springs Fire Protection District

Attachment B – Deer Springs Fire Protection District

Attachment C – Deer Springs Fire Protection District

Attachment D – September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road

Attachment E – LHR TM 5571 – Sight Distance Analysis at Circle R Drive and Mtn Ridge Rd

Attachment F – LHR TM 5571 – Sight Distance Analysis at West Lilac Road and Covey Lane

Attachment G – Figure 27-1 Project Gated Access

Attachment H – Figure 1.6 from Chapter 1 – LHR DEIR

Irreversible Impacts

Geology

Waste Water and Water Quality Concerns

Attachment A – Valley Center Municipal Water District, 8 July 2013

Attachment B – Pre-development Agreement VCMWD/Accretive Investments Inc.

Attachment C – Excerpt San Diego County Consolidated Fire Code

Attachment D – Storm Water Management Plan for Master Tentative Map (total 608 Acre Project)

Attachment E – Storm Water Management Plan for Implementing Tentative Map (114.9 Acre/352 EDU First Phase)

Public Services

BSD Review of Lilac Hills Ranch DEIR

DSFD review of Lilac Hills Ranch DEIR

Library Review of Lilac Hills Ranch DEIR

Valley Center Pauma Unified School District Review of Lilac Hills Ranch DEIR

SD Sheriff's review of Lilac Hills Ranch DEIR

Project Alternatives

Attachment A – EIR Project Objectives

Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives

Attachment C – 1251 EDU Reduced Footprint Map

Attachment D – 881 EDU Reduced Intensity Map

Attachment E – 1351 EDU 2.2 C Hybrid Map

Specific Plan

Respectfully,

Oliver Smith

Chairperson, Valley Center Community Planning Group

Item E5 Executive Summary:

Executive Summary: Lilac Hills Ranch DEIR Responses

A. Introduction

This Executive Summary is intended to aid reviewers of the comments on the Lilac Hills Ranch Draft Environmental Impact Report [DEIR] submitted by the Valley Center Community Planning Group. The review of the DEIR prepared by the County Department of Planning and Development Services, the Lilac Hills Ranch Specific Plan prepared by the applicant, and many technical reports that are the basis of the DEIR prepared by various consultants, has generated a significant volume of comments. The thousands of pages that make up the DEIR documents and their sometimes very technical nature made it difficult for volunteers to review and respond to every item in the relatively short time allowed. However, the principle issues are addressed in some detail in the responses that accompany this summary.

This summary does not substitute for the detailed comments and analyses presented in the attached comment documents.

B. Chapter 1

1. Project Objectives – The following excerpt from the DEIR summarizes the Project Objectives:

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

The proposed project is based on a wide range of reports that studied the different constraints and opportunities involving the project in concert with the County of San Diego and local community issues. The general components of the proposed project were determined using the project objectives described below.

- 1. Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community.*
- 2. Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.*
- 3. Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.*
- 4. Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.*
- 5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.*

6. *Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.*
7. *Provide the opportunity for residents to increase the recycling of waste.*
8. *Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.*

The County has structured the Objectives -of the EIR, in aggregate, so narrowly that only the Lilac Hills Ranch Project, as proposed by the applicant, can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. The VCCPG response takes exception to the implied claims that the Project meets all of its own objectives and suggests that other alternatives to the proposed Project may fit the objectives better.

Objective One

The County has structured Objective One of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Two

The Project does not meet its own objective for Objective Two.

Objective Three

We do not have any issues with this objective other than to state that any Project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Four

The Project does not meet its own objective for Objective Four.

Objective Five

We do not have any issues with this Objective other than to state that any project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Six

The County has structured the sixth Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Seven

Any Project Alternative would comply with this Objective equally.

Objective Eight

This objective is subjective and could be met by developing the Project at General Plan densities, which would preserve existing agricultural businesses and residential-based businesses.

2. Project Inconsistencies with Regional and General Plans

In comments submitted over the last year, the Valley Center Planning Group and the Valley Center Design Review Board have challenged the proponent's assertions that this SP/GPA is consistent with the adopted County General Plan [GP], or with Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.

Our previous comments, which are attached, have also challenged the logic exhibited throughout Accretive Investment Group's Specific Plan and now in their Draft Environmental

Impact Report (DEIR): that amending a particular GP Regional Category to suit the project somehow also reconciles the project's inconsistencies with a wide array of General and Community Plan Goals and Policies.

The proposed SP/GPA is inconsistent in broad and fundamental ways with the San Diego County General Plan and Community Plans of both Bonsall and Valley Center. Further, the DEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences as CEQA requires. The DEIR is derelict in concluding as it does that: "Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant" (Chapter 3 Environmental Effects Found Not To Be Significant (p 3-65).

This DEIR fails to perform the analyses required for decision makers, first, to understand the parameters of this proposal, and, second, to appreciate the nature and reach of its impacts. The DEIR does not even have a rudimentary analysis of Consistency with the General Plan.

Internal consistency is required of all County General Plans by California State Law. Therefore, in considering a Specific Plan, particularly one that requires amendments to an adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designations and road classifications, principles, elements, goals and policies.

A Specific Plan is an implementation vehicle. Approval requires compliance with CEQA; consistency as well with the web of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific Plan – the tail wagging the dog. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the August 3, 2011 San Diego County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review.

We all can understand why the applicants might want to avoid disclosing the array of GP and CP Goals and Policies that this project violates. But CEQA's purpose is not to gloss over or obscure inconsistencies in order to ease approval of this project. CEQA's purpose is disclosure.

Therefore, the DEIR for this SP/GPA must reckon specifically and individually with the General Plan Vision and Guiding Principles and the reflection of these in the Community Development Model, as well as with Goals and Policies across the GP's seven elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety and Noise; as well as goals and policies of the Bonsall and Valley Center Community Plans.

Once inconsistencies are disclosed there are only three ways to resolve them: reject the project, re-design the project, or re-build the County General Plan to suit these applicants. Inconsistencies with General and Community Plans, Design Guidelines and other ordinances and policies are NOT subordinate to this project's Specific Plan, as the Specific Plan asserts.

The full text of the General Plan and Community Plan Inconsistencies comments does an exhaustive analysis of several of the General Plan and Community Plan goals and policies to reveal the inadequacies of the proposed Project and the premise being advanced to allow its approval.

C. Chapter 2

1. Biological Resources

The DEIR cites three sensitive plant species observed on the Project site as well as observations of 13 Group 1 animal species ranging from lizards, snakes and jackrabbits to raptors, passerine birds and mule deer. Beyond the cited plants and animals, the DEIR notes the projected significant loss of several native plant habitats with special importance for the cited animal species and others such as mixed southern chaparral and coastal sage scrub.

The DEIR indicates that these significant losses can be mitigated off-site through the purchase of land within the draft PAMA based on a formula developed by the County. However, the DEIR does not account for the loss of 608-acres of raptor foraging area, which includes both natural vegetation formations and agricultural lands. The proposal is to set aside 77-acres off-site for raptor foraging calculated using the losses of sensitive native vegetation. It does not include in that calculation the lost agricultural land foraging area.

The DEIR suggests that the impacts to the three sensitive plants and 13 sensitive animals [and we assume the resident plants and animals not judged to be sensitive] are less than significant once mitigated, saying that none of the cited species represent significant populations or significant portions of regional populations. And yet, the DEIR and Biological Resources Report offer no data to support those claims. Nor, do they offer data that show the local population densities of the cited species that can be compared to regional population densities.

The DEIR notes that the riparian habitats on the Project site will be preserved in open space easements. Those portions of the riparian habitats destroyed by road crossings will be recreated on-site adjacent to the preserved existing habitats. However, the DEIR gives short shrift to the edge effects it acknowledges [e.g. human intrusion, invasive plant species, domestic pets, noise, night light, etc.] pointing to fences and signage and weeding efforts managed by an undetermined manager.

The DEIR does not adequately account for the cumulative effects stemming from the impacts to the Project site. If we take San Diego County as the 'region' or even North San Diego County as the region, we should be looking at the historic extent of coastal sage scrub, southern mixed chaparral, southern coast live oak riparian woodland, coast live oak woodland, southern willow scrub, southern willow riparian woodland, and wetlands within that area compared to what exists today. We should then ask to what extent have these vegetation communities been extirpated and to what extent the remaining examples of those communities have significance. Comparing proposed destruction in one project with destruction that has or will result in a handful of other smaller projects isn't an effective measurement of cumulative effects.

2. Cultural Resources

The DEIR and Cultural Resources Report address historic cultural sites on the Project site individually. They fail to regard the Project site overall in the context of nearby significant Native American village sites along the San Luis Rey River and its tributary, Moosa Creek. The Project site is rich with artifacts and occupation sites, but the proposed mitigation and preservation procedures appear to be piecemeal for a Project as large and transformative as this one.

The grading, by cut and fill techniques, of 4-million cubic yards of earth will jeopardize the opportunity for future study and appreciation of the basic integrity of the cultural significance of the larger area. There are suggestions in previous studies that an as yet undiscovered earlier human habitation of the Project site area, or a separate village from those already known may be present.

There are also concerns about the data recovery program and its methodology. Most of the previous studies of the area are 35 years old and more current studies may be needed to fully understand the significance of the site.

3. Hazards, Hazardous Materials, Wildfires

The development of the densely packed Project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion in this subchapter of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used.

The proposed wastewater recycling facility [WRF] will be using hazardous materials, such as chlorine, in its treatment process. The facility is only 686-feet from the proposed school site and only 250-feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the conclusion that the risks from the use of toxic, hazardous materials are less than significant is overly optimistic, even under carefully controlled circumstances.

The WRF will not be built to coincide with the earlier phases, requiring that sewage is trucked off-site for disposal. The same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project? Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.

The issues of emergency response and evacuation plans are troublesome for this Project. The Evacuation Plan does not address the most fundamental evacuation issue of the proposed Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed Project. The mobility element roads nearest the Project are West Lilac and Circle R Roads. Both roads were built as 2.2 E two-lane roads to serve a rural community with small, rural populations and the applicant plans no upgrades to these roads. The addition of 5000+ people at the Project site will severely impact both emergency response and evacuation during a crisis event, exacerbating already congested conditions in such circumstances and putting many people at risk.

The applicant would further impact evacuation plans by proposing 10 road standard modifications that would lower the classification of the mobility element roads in some cases and lower the design speeds of those roads. With lower design speeds and narrower roadways, the Project will imperil evacuations from Bonsall and Valley Center to the I-15 corridor by existing residents, and impede the prospective residents of the Project at the same time. This kind of impact, played out in scenarios like Bonsall and Valley Center experienced in 2003 and 2007, would severely and significantly put hundreds of people at risk. Further, the Project has

but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. There are no plans to upgrade this road. If an evacuation event is caused by a large wildfire from the west, the ensuing smoke plume will result in a panic evacuation over a single treacherous road.

The Project has not demonstrated that the project can meet the 5-minute Emergency Response requirement for Fire Services. The proposed solutions of building a fourth fire station in the Deer Springs Fire Protection District [DSFPD] at the Project site do not work from the perspective of jurisdictional issues and fiscal operational cost issues. None of the existing fire stations in the DSFPD meet the 5-minute requirement.

The Project is proposed for a site in a very high fire hazard severity zone [FHSZ]. Locating a Project of this size and scope in a very high FHSZ is not a smart location that is consistent with preventive land use planning. The DEIR states that failure to meet the standard 100-foot Fuel Modification Zone [FMZ] for significant portions of the Project would be a significant impact. . Section 5.4 Fuel Management Zones on page 42 of the FPP states “The project includes a few areas where fuel modification zones are less than 100 feet wide. Based on even a quick scan of Figure 1.6 from Chapter 1 of the DEIR (Attachment H), the more accurate and true statement is: The project includes extensive areas where fuel management zones are less than 100 feet wide. This is a severe design flaw.

Fire Protection Plan (FPP)

The proposed Project FPP does not meet the following basic requirements identified below by Issue Number:

1. Of the three Fire Station site Options proposed by the Applicant, none meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Charter of the DSFPD focuses on providing no greater than 5-minute emergency response time to the ENTIRE DSFPD, of which the proposed LHR Project is a subset.
2. The Applicant states in the FPP that the LHR Project fully complies with the DSFPD Ordinance No. 2010-01, County of San Diego Consolidated Fire Code, and County of San Diego Public and Private Road Standards. *The LHR has factual compliance issues with all of these regulations.*
3. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address either Structure Fires or Emergency Medical Service (EMS).
4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.

Fuel Modification Zones (FMZ) – The applicant appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100 foot FMZ requirement.

Thus, the proposal amounts to putting a large project with several vulnerable populations into a very high fire hazard severity zone with substandard fuel modification zones and depending on more rigorous construction techniques to restore a margin of fire safety. The question becomes why the applicant hasn't redesigned the Project to allow for standard FMZs throughout the Project? This problem is strained further by uncertain access to the Project site by fire apparatus. That access depends on at least two private roads, for which easement access is uncertain, and the applicant's proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency.

4. Significant Irreversible Environmental Changes Resultant from Project Implementation

The proposed Project [Lilac Hills Ranch] will cause significant, irreversible, and, in most instances, immitigable impacts to the Project site, to the Valley Center and Bonsall communities and their community plans and to the County of San Diego and its General Plan. The Project will require amendments to the General Plan, its principles, policies, and regional land use designations and to the Bonsall and Valley Center Community Plans, or, at least, a severely disfigured interpretation of all of them.

The DEIR focuses on the grading of the Project site, on the use of fuels [energy] to prepare the Project site and manufacture construction materials, on the consumption of construction materials [wood, concrete, asphalt, drywall, etc.], on subsequent energy and natural resource consumption by the eventual residents, and on the amount of time to construct the project.

The movement of over 4-million cubic yards of dirt and rock on the Project site is perhaps the most obvious irreversible impact. Another is the loss of hundreds of acres of productive agricultural land. Another is the loss of significant amounts of biological habitat and the flora and fauna that presently occupy them. The DEIR does not adequately address the cumulative impact of scores of such individual losses caused by multiple projects within the County and the irreversible loss of the majority of native habitats in the aggregation of those individual losses.

Less obvious losses are the changes to the General Plan and related Community Plans that will be required for this Project to be approved. Those changes will dramatically alter the parameters of the General Plan that strive for smart growth. And, if the Project is approved, it will set a precedent that will have severe ramifications across the unincorporated countryside of San Diego County.

D. Chapter 3

1. Water Quality/Hydrology

The DEIR concludes under Issue 1: Water Quality Standards and Requirements in Chapter 3.0 “Environmental Effects Found Not to be Significant” as follows:

“Through these design features, including the use of permeable pavers, the project would not result in the violation of any water quality standards or waste discharge requirements. Impacts associated with this issue would be less than significant.”

We strongly disagree with this finding and conclude that there is high likelihood of potentially significant and immitigable impacts.

Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements as represented in figure 3-4, “Off-site Sewer Collection System.” This determination is confirmed by Valley Center Municipal Water District [VCMWD] in a letter labeled Attachment A. This finding makes construction of sewer and recycled water pipelines for the Project problematic.

Use of the Lower Moosa Water Reclamation Facility [LMWRF] for a series of alternative sewage solutions has been proposed. The LMWRF was built in 1974 and provides disinfected secondary treatment of reclaimed water only. It has been approved by two agencies to double the LMWRF capacity to 1.0 million gallons/day [MGD] of influent. That capacity is not presently added.

If eventually expanded, likely it would be required to upgrade its treatment to tertiary standards to allow beneficial use of the recycled water on landscaping and golf courses and to prevent degrading the water quality of the San Luis Rey Basin watershed. Current capacity of the LMWRF is 0.5 MGD and it is currently averaging 0.35 MGD of influent. The present ground water percolation pond capacity is 0.44 MGD. At present capacities, LMWRF could accept a maximum of 450 additional equivalent dwelling units [EDU]. However there is some question whether the capacity of the percolation ponds would be allowed to reach the 0.44 MGD limit. Several already pending permit applications, which could reduce the 450 additional EDUs, further complicate matters. Delays for permitting and construction could make the capacity improvements unavailable for some time. Another factor is the limited available space at LMWRF for the expansion.

Analysis of tabular data from the Waste Water Management of Alternatives Study [table 5-1] calls into question the availability of adequate acreage to discharge recycled water beneficially on-site.

It appears that the Hydro Modification Design is relying on exaggerated assumptions for both rainwater harvesting success and the availability of residential landscape areas as permeable surfaces for absorption of water. That same design also reveals the desire to install 23 acres of private roads paved with permeable pavers to permit additional percolation of water into the soil. Such roads may fail under the weight of a Type 1 fire engine.

It is tortured logic to argue that taking green field agricultural and semi rural estate land and introducing a dense urban environment that develops 504 of the 608 acres, adding 83 acres of road and 68 acres of manufactured slopes is consistent with policy COS-5.2 which requires development to minimize the use of impervious surfaces.

2. Public Services

We are informed that several local public service organizations will be responding to the DEIR within the scope of their responsibility to provide such services. We have spoken to the Valley Center Municipal Water District, Valley Center Pauma Unified School District, Deer Springs Fire Protection District, the San Diego County Sheriff's Department, the Regional Water Quality Control Board, the California Department of Fish and Wildlife, and the U. S. Fish and Wildlife Service. [Five emails to/from agencies are attached]

3. Geology and Supplemental Geology Report

The review identifies questions regarding the need for blasting that cannot be quantified to determine the amount and length of time needed to do removals and ultimately placement of fills. Silicates will be a potential hazard relative to the AQMD standards.

Slope Stability and Remediation describe cut slopes 6.2.1 and fill (manufactured) slopes 6.2.2 in excess of seventy-feet (70-feet) in height. There are no seventy-foot high manufactured slopes existing in this community, which makes these proposed slopes out of character with the community.

E. Chapter 4 – Project Alternatives

The Lilac Hills Ranch Project Alternatives from Chapter 4.0 of the DEIR are below:

1. No Project/No Development Alternative
2. No Project / Existing Legal Lot Alternative (49 EDU + no commercial)
3. General Plan Consistent Alternative (110 EDU + no commercial)
4. Reduced Footprint Alternative (1251 EDU + 6 acres of commercial)
5. Reduced Intensity Alternative (881 EDU + 5.6 acres of commercial)
6. 2.2C (Hybrid) Alternative (1365 EDU + 15.3 acres of commercial)

The County's Project Alternatives Analysis in Chapter 4 of the DEIR is grossly defective in meeting CEQA requirements in five areas that are summarized below:

1. The DEIR Objectives against which the Alternatives are judged for Environmental Impacts are biased and should be changed to equitable objectives, from which compliance against can be fairly measured.
2. The Project does not meet its own Objectives, when fairly assessed.
3. There is a valid offsite alternative – the Downtown Escondido Specific Plan Area (SPA) that needs to be included as an Alternative.
4. The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives. These three "Alternatives" are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis. [see table 1]
5. The Alternatives were not fairly assessed in the DEIR by the Applicant.
6. When all eight Alternatives are fairly assessed, the Downtown Escondido SPA meets more Objectives than the Project or any Alternatives.

| Table 1 -Scant Attributes of 3 Alternates Provided | | | | | | | | |
|--|--|---------------|-------------------|---------------|-------------------|---------------|----------------|---------------|
| Land Use | Project | | Reduced Footprint | | Reduced Intensity | | 2.2 C (Hybrid) | |
| | Gross Acreage | Units/Sq. Ft. | Gross Acreage | Units/Sq. Ft. | Gross Acreage | Units/Sq. Ft. | Gross Acreage | Units/Sq. Ft. |
| Single Family Detached | 158.8 | 903 | 142.1 | 783 | 275.5 | 881 | 177.0 | 792 |
| Single Family Senior | 75.9 | 468 | 71.1 | 468 | 0 | | 75.9 | 468 |
| Single Family Attached | 7.9 | 164 | 0 | | 0 | | 4.3 | 105 |
| Commercial/Mixed Use | 15.3 | 211 | 6.0 | | 5.6 | | 15.3 | |
| Water Reclamation | 2.4 | | 2.4 | | 2.4 | | 2.4 | |
| RF/Trailhead | 0.6 | | 0 | | 0.6 | | 0.6 | |
| Detention Basin | 9.4 | | 5.4 | | 5.5 | | 5.5 | |
| School Site | 12.0 | | 9.0 | | 0 | | 12.0 | |
| Private Recreation | 2.0 | | 0 | | 0 | | 2.0 | |
| Group Residential/Care | 6.5 | | 0 | | 0 | | 6.5 | |
| Institutional | 10.7 | | 10.7 | | 10.7 | | 10.7 | |
| Park - HOA | 11.8 | | 10.0 | | 3.0 | | 11.8 | |
| Park - Dedicated to County | 12.0 | | 6.0 | | 9.0 | | 12.0 | |
| Biological Open Space | 103.6 | | 168.8 | | 102.7 | | 103.6 | |
| Non-circulating Road | 45.7 | | 45.7 | | 41.5 | | 43.1 | |
| Circulating Road | 37.6 | | 37.6 | | 21.5 | | 30.0 | |
| Common Areas/Agriculture | 20.2 | | 20.2 | | 65.0 | | 45.0 | |
| Manufactured Slopes | 67.5 | | 67.5 | | 65.0 | | 50.0 | |
| Other/Accretive Math Error* | 8.1 | | 5.5 | | 0 | | 0.3 | |
| Total | 608.0 | 1746 | 608.0 | 1251 | 608.0 | 881 | 608.0 | 1365 |
| sq. ft. = Square Feet | * Table 4-1 from DEIR Chapter 4 Project Alternatives has the indicated arithmetic errors | | | | | | | |
| HOA = Homeowner's Association | | | | | | | | |

Table 2, below, rates scoring of Alternatives against the Applicant's biased eight Objectives.

| TABLE 2 - COMPARISON TO PROJECT OBJECTIVES | | | | | | | | |
|---|------------|------------------------|---------------------------|----------------------|-------------------------|-------------------|-------------------|--------------|
| Objectives | Project | Alternates | | | | | | |
| | | Downtown Escondido SPA | No Project/No Development | No Project/Legal Lot | General Plan Consistent | Reduced Footprint | Reduced Intensity | 2.2 C Hybrid |
| 1 - Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community | No | Yes | No | No | No | No | No | No |
| 2 - Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area | No | Yes | No | No | No | No | No | No |
| 3 - Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers | Yes | Yes | No | No | Yes | Yes | Yes | Yes |
| 4 - Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff | No | Yes | No | No | No | No | No | No |
| 5 - Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area | Yes | N/A | No | No | Yes | Yes | Yes | Yes |
| 6 - Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing | Yes | Yes | No | No | No | No | No | Yes |
| 7 - Provide the opportunity for residents to increase the recycling of waste | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| 8 - Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Total Number of Objectives Met | 5/8 | 7/8 | 2/8 | 2/8 | 4/8 | 4/8 | 4/8 | 5/8 |

Clearly, the least Environmental Impact, even to these biased Objectives, is shown in Table 2 to be the Downtown Escondido SPA Alternative.

More importantly, the General Plan alternative must be properly considered by the applicants and County, rather than focus their attention strictly within the boundaries of the Project. Apart from the time and money already spent developing the General Plan [12 years and \$19.6 million], it was designed as a plan for the entirety of the County's unincorporated area while being mindful of the incorporated cities as well. The Lilac Hills Ranch Project is only a single piece of a much larger puzzle.

To study this "puzzle piece" is NOT to study the General Plan alternative. This "half-study" misses the underlying logic of the new County General Plan which is, according to the lengthy introduction to the GP, to achieve "sustainable development" with a two-part strategy called Smart Growth.

- I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley.
- II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife among other functions.

The plan works ONLY when its two interdependent parts work together.

The Lilac Hills Ranch Project undermines both aspects of this strategy.

The General Plan alternative implements both aspects of this strategy. The only acceptable “study” of the General Plan Alternative is to study it in its entirety. The superior solution will be clear.

F. Specific Plan

The comments on the Specific Plan include several major concerns:

1. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.
2. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure.
3. Compliance with the General Plan. The Project’s Specific Plan threatens to overturn virtually every element in the County’s new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, nearly \$20 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. If the Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.
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 and then maintaining these infrastructure items over and over.

The Project is seeking to build a city the size of Del Mar, CA that will require an almost entirely new infrastructure—new roads, schools, sewer systems and a broad range of other infrastructure items. These infrastructure expansions are why the Valley Center Community Plan designates the North and South villages at the core of Valley Center for such housing and commercial densities. The Community Development Model also directs that kind of concentration of density and infrastructure not at the outer edge of the community as this Project proposes, but at the Valley Center core.

5. LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “expected to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.

The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Valley Center community, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Valley Center community and the zoning and land use patterns within Valley Center are consistent with that model. The same is true for the Bonsall community. The proposed addition of the LHR Project in the western portion of the Valley Center community flouts the intention of the Community Development Model by establishing high-density development away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.

6. Agriculture— The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. 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 the Project at the planned site would greatly damage many currently productive and successful agricultural operations.

7. Twists of meaning and lack of clarity in the plan. One of the most difficult aspects of the Project’s 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 The Project violates nearly all LEED-ND standards for site selection and linkage; that adding 5,000 residents to a rural, agricultural area actually improves traffic over narrow, winding rural roads; that grading and moving 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.

In addition, after criticizing three previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or an idea rather than a plan that defines their intentions.

There are many other concerns addressed in the Specific Plan comment document. They range from the size and type of parks in the Project to the Fire Protection Plan, from the Water Reclamation Facility to open space and conservation policies, from V and D special area regulations to circulation elements. There are too many to reasonably relate in this summary.

Item E6, Letter to Murali Pasumarthi, DPW, re Lilac Road/Old Castle Road Repairs:

Murali Pasumarthi
Manager Traffic Engineering
Department of Public Works
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Lilac Rd/ Old Castle Road corridor repairs and traffic planning

Murali,

First and foremost, the Valley Center Community, along with the Valley Center Community Planning Group, would like to thank you and DPW in general for expediting maintenance on the western section of Old Castle Road in Valley Center. The recent repairs have stabilized sections of that heavily-travelled road which were rapidly deteriorating. As the combination of Old Castle Rd and Lilac Rd carries a significant percentage of all traffic into and out of Valley Center, the work you did has been noticed and is appreciated daily by hundreds of Valley Center residents.

At our last Planning Group meeting we adopted a motion to send you and DPW a letter of recognition thanking you all for taking care of our road. Please consider this letter a commendation from the entire Valley Center Community. Thank You!

As we mentioned at the last VCCPG meeting you attended, there are many other sections of Old Castle / Lilac Road also in various stages of deterioration. Specifics include the road-bed in the area of Via Piedra having large sections of asphalt coming up and leaving pot-holes. There are also some upcoming issues at the intersection of Lilac Rd and Old Castle Rd, where the weight of heavy vehicle traffic has started to break through the road bed, undoubtedly leading to rapid deterioration of that section when it starts raining again.

Recent proposed mitigation for increased casino traffic in our area has not included studies which assess the impacts of casino visitor traffic on Old Castle/Lilac Road. We see a large number of buses and trucks which serve the casinos that use Lilac Rd and Old Castle Rd each day. Many use the route as they are not permitted to travel on SR76 east of 1-15 due to vehicle length restrictions. As a result, we feel the mitigations being considered, and the funding for them, are not sufficient to properly address the impacts generated.

At our VCCPG meeting on July 8, 2013, we had a discussion about the issue of heavy vehicles using this road and contributing to its rapid deterioration. A motion was made and unanimously adopted to request San Diego DPW to perform a traffic survey of Lilac Road / Old Castle Road, with the goal of answering

questions about how many heavy vehicles use that road each week. Please note that many of the buses operate in the evening and night hours, with heavier traffic on weekends as they are almost exclusively destined for, or coming from, the local casinos. Therefore it is important that the surveys collect information during those times to provide an accurate traffic pattern representation.

VCCPG formally requests that DPW conduct a formal traffic study, covering an entire week, including the weekend, for traffic using the Old Castle/Lilac corridor. We request that the traffic data be differentiated as to vehicle type (i.e. buses). We suggest a survey point somewhere around the Valley Center Community Hall at 28246 Lilac Rd (near the intersection with Valley Center Rd) since that is an area where all traffic is easily counted.

Regards,

Oliver Smith
Chair, VCCPG

cc: Kenton Jones, Chief of Safety & Loss Mitigation, DPW
Michael Long, Project Manager, Public Works, Engineering Services

Item E6, Letter to Mark Wardlaw, re Negative Impacts to Valley Center's Mobility Element with Open Space Constraints on Road 3 Route:

Mark Wardlaw, August 12, 2013
Director, Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: Negative Impacts to Valley Center's Mobility Element with open space constraints on Road 3 route.

Mark,

The Valley Center Community Planning Group has major concerns as to the viability of the Mobility Element for Valley Center as a result of a change in the proposed land use to the former SPA Lilac Ranch to open space. As you may recall, Road 3 goes right through the former SPA Lilac Ranch. In order for Valley Center's Mobility Element to remain viable, Road 3 (a key new east/west road) was added to the Valley Center Circulation Element during the General Plan Update. Without this proposed road the General Plan becomes unbalanced and will have a potential major impact on public safety.

The General Plan Update was predicated upon better circulation, not worse. At build-out, there is a projected bottleneck (LOS F) on Valley Center Road between Miller Rd and Lilac Rd. Currently there are no alternate routes available, thus isolating a large segment of Valley Center's northern population. The intent of Road 3 was to provide bottleneck relief, better intracommunity connectivity,

and an emergency evacuation route.

This road is mandatory for future execution of the General Plan for Valley Center. The exact alignment of the proposed Road 3 is not important, but please provide alternative alignment either thru or around this SANDAG managed open space area, or explain your strategy to address the deficiency on the General Plan Update Circulation Element. The reason for the urgency is our community is continuing to experience impacts from proposed additional Tribal casino gaming and developments (i.e. Harrah's Rincon, Valley View Casino, and Lilac Hills Ranch). The VCCPG asks that you please address these circulation impacts.

Regards,

Oliver Smith
Chair, VCCPG

Cc: Bill Horn, Supervisor 5th District, San Diego County
Eddie Sprecco, Land Use Aide to Bill Horn
Chirs Cham pine, Tribal Aide to Bill Horn
Dixie Switzer, Tribal Liaison, PDS, San Diego County
Eric Lardy, Tribal Liaison, San Diego County
Michael Long, Project Manager, Public Works, Engineering Services
Murali Pasumarthi, DPW Traffic Manager
Bob Citrano, PDS, San Dieao County

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Regards,

A handwritten signature in blue ink that reads "Oliver Smith". The signature is written in a cursive style.

Oliver Smith
Chair, VCCPG

cc: Kenton Jones, Chief of Safety & Loss Mitigation, DPW
Michael Long, Project Manager, Public Works, Engineering Services