

Valley Center Community Planning Group

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January 12, 2016

The Valley Center Community Planning Group has the following comments on the Notice of Preparation of Subsequent EIR for County's Property Specific Requests to the countywide General Plan Amendment and Rezone.

1. The NOP does not provide the Public with sufficient information to intelligently comment, as required by CEQA.
 - a. The NOP should describe why the "Project" is not limited to the original individual properties requesting, but denied, increased densities in the county's General Plan approved in August 2011.
 - b. Particularly in Valley Center, the NOP should, but does not, describe the number of acres and parcels and existing and proposed dwelling units for the original individual properties requesting, but denied, increased densities in the county's General Plan approved in August 2011, without consideration of the artificial "study areas."
 - c. The NOP should, but does not, state why the proposed additional dwelling units are "necessary" or "desirable" to add to the already over 72,683 new units provided for by the newly adopted General Plan (which have NOT been utilized since its 2011 adoption), or how that would not undermine the entire structure of the newly adopted General Plan with its focus on planned growth in or adjacent to existing or planned higher density and infrastructure (and thus reduced sprawl and greenhouse gas emissions).
 - d. The NOP does not, but should, make clear what impact, if any, approval of the individual parcels (or the adjacent "study area" parcels) would have on the pending Accretive Lilac Hills Ranch Project, whether that Project is approved, or denied.
 - e. The NOP should describe what methodology was used to create the artificial "study areas" around the original individual properties requesting, but denied, increased densities in the county's General Plan approved in August 2011, other than to disguise their continued incompatibility with that adopted General Plan.
2. Will the Project be just the inclusion of the Property Specific Requests parcels in the General Plan, or will it be inclusion of those parcels as absorbed in the various artificial "study areas?"
3. The artificial creation of the "study areas" also makes it difficult for the public reader to understand the impact on the CEQA-required statement of "Project Objectives" against which the Project and all Project Alternatives will be measured. Will the "Project Objectives" for this SEIR be like those created for the Accretive Lilac Hills Ranch Project, to ensure that only the Project, and not any proposed alternative can satisfy them?
4. Will there be a Project Alternative that proposes just the Property Specific Request parcels (without the "Study areas") but at reduced densities than those requested?
5. Will property owners in the "Study areas" be offered the opportunity to opt-out of being in the study area?

The motion was approved by a vote of 14-0-1 at the regular Valley Center Community Planning Group meeting on January 11, 2016.

Oliver Smith
Chair, VCCPG

Valley Center Community Planning Group

PO Box 127 Valley Center CA 92082

February 8, 2016



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(open)

The Valley Center Community Planning Group has the following additional comments on the Notice of Preparation of Subsequent EIR for County's Property Specific Requests to the countywide General Plan Amendment and Rezone.

The Valley Center Community Planning Group sincerely feels that it is inappropriate for the county to be proceeding with this project without first completing the outstanding community plan updates needed since the General Plan Update was approved in August 2011. Per that update, community plans are a key element for making land use decisions. Projects continue to be judged against the old community plans without an opportunity for revision based on local community representative input. Land use decisions using old and outdated community plans do not accurately reflect the current community input to their unincorporated areas. Updating of these plans has the right to be the same priority as the PSRs now being proposed.

This is the **second** PSR project since the approval of the General Plan Update in August 2011. Valley Center is one of eight communities that have been asking for the county's help in completing their community plan updates. The county help has not been forthcoming. The needs of the communities with the old community plans should have the county resources at least equivalent to as those who are requesting the first round of PSRs, let alone this second round of PSRs.

We note that all of the county's community plans were at least minimally corrected during the General Plan Update process to include the minimum necessary wording to keep them legally consistent with the released GP Update. The process changes that occurred with the GP Update, including a complete reboot halfway through the process, did not allow many communities to focus on updating their community plans. They instead needed to be focused on the many complex changes and procedural issues involved with the GP Update itself. As such, significant community plan input was not available in an advanced form such that it could be included in the GP Update.

The Director of Planning and Development Services has publicly stated an estimate of 12 months to process each community plan update. He also stated PDS can only do two plan updates simultaneously. The reason given is limited resources with which to help the CPGs and CSGs. To help the county resolve this issue, VCCPG strongly recommends the following:

- 1) Reallocation of County PDS resources from the PSR project to the Community Plan Update projects until such time as the Community Plan Projects are completed.
- 2) PDS evaluate its community plan update process to reduce update time to 6 months. Valley Center Community Planning Group stands ready to assist the county in this reasonable goal.

The motion to approve the additional comments was approved by a vote of 13-0-0 at the regular Valley Center Community Planning Group meeting on February 8, 2016.

Regards,

Oliver Smith
Chair, VCCPG

From: [Ranitea Harispuru](#)
To: [Eichar, Peter](#)
Subject: Valley Center Owner About GPA
Date: Saturday, December 26, 2015 9:27:06 AM

Assessor Parcel # 1890132500
28341 Cole Grade Road, Valley Center
15.25 acres, currently zoned as "citrus groves"

Hi Peter,

We recently received the Notice of Preparation of An Environmental Impact Report, thank you for reaching out.

We were unable to attend the December meeting, but we'd like to get more information about what all of this entails for us property owners, as well as what has been decided already, what is in the works, and what is expected from us, as well as our rights and responsibilities in this project.

Please don't hesitate to call me at your convenience on my cell (# in my signature).

Best regards,
Ranitea

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February 2, 2016

COMMENTS on Notice of Preparation, 3Dec2015, revised 10Dec2015, re. Assessor Parcel Number 1283105000, Townsend Lyn R & Diana R Trust, 9430 W Lilac Rd, Escondido, CA 92026

Thank you for the opportunity to provide comments to the recently published NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT dated December 3, 2015 (revised December 10, 2015). Per requirements, our comments have been delivered by February 4, 2016, and have been sent via email to Peter.Eichar@sdcountry.ca.gov.

In the comments that follow, I note the importance of including the following pieces within the proposed SEIR:

- Thorough analysis and evaluation of cumulative effects of sweeping County-wide general plan land use and zoning redesignations,
- Complete inclusion and analysis of potential alternatives, particularly including infill development, and
- Careful examination of impacts to the recreational bicycling communities of North County San Diego.

The proposed Project is a Property Specific Requests GPA to the San Diego County General Plan. The proposed Project would result in revisions to the existing General Plan Land Use and zoning designations on private properties including their surrounding study areas, totaling approximately 13,000 acres within 1,149 parcels throughout the unincorporated County.

The Project diverges sharply from the county's expensive new General Plan, a blueprint for growth with the intention to guide decision-making. The new General Plan's LU-1.2 policy to prohibit leapfrog (sprawl) development or the cumulative impact of "revisions to the existing General Plan Land Use and zoning designations" which ultimately contribute to leapfrog and sprawling development (re General Plan LU-1.5 policy).

Based on the County's preliminary analysis of the proposed Project, the following environmental issues are to be examined in the SEIR: Aesthetics, Land Use and Planning, Agriculture and Forestry Resources, Mineral Resources, Air Quality and Greenhouse Gas Emissions, Noise, Biological Resources, Population and Housing, Cultural and Paleontological Resources, Public Services, Geology and Soils, Recreation, Global Climate Change, Transportation and Traffic, Hazards and Hazardous Materials, Utilities and Service Systems, and Hydrology and Water Quality. Other than brief mention that the SEIR will tier to the Programmatic EIR for the General Plan Update, there is no specific mention of CUMULATIVE IMPACTS of the aforementioned environmental issues. Unfortunately, the existing cumulative impacts analysis in the General Plan Update seem to be short on logic and fail to adequately assess the significance of collective impacts, particularly from a County wide redesignation of land uses from low density to high density, or low density to commercial or industrial.

Cumulative impacts are an essential inclusion to the SEIR and must be analyzed carefully and thoroughly. The cumulative impacts are where the erosion of community character and environmental safety and health can be most accurately captured, especially when such large scale, County-wide growth plan changes are to be made. Even if local impacts to habitat and infrastructure are considered less than significant under each individual development proposal, the cumulative impacts of sweeping zoning redesignation are certainly not. Each proposed or future revision or change in zoning designation represents an incremental change and cumulative impact on conditions in comparison to conditions at the time of adoption of the General Plan Update (2011).

Of particular concern is that cumulative environmental and infrastructure impacts have already reached or will reach a tipping point in many of the proposed zoning redesignation sites. For example, in the nearby proposed Lilac Hills Ranch development (Valley Center CPA), the roads, water, sewers, and house fire/wildfire response times are not sufficient for an estimated 5,000 additional people to live there, not to mention impacts, if the development proceeds, on the existing population in the surrounding and neighboring land and parcels. Conditions get cumulatively worse as developers are given permission to acquire rural and semi-rural land, build a large development on them, and leave the County to scramble to relieve the issues brought about by increasing densities in a previously rural or semi-rural

community. In other words, how can cumulative impacts that are at a tipping point of “significance” or imminently near a tipping point be mitigated or minimized with leapfrog, sprawling development in rural and semi-rural areas with little to no infrastructure?

Another essential piece of any EIR is the presentation of alternatives to the proposed project, which must be considered in order to ensure that significant individual and cumulative impacts are avoided, minimized, or mitigated. It is my expectation that the presentation of alternatives include a thorough analysis of the possibility of utilizing infill growth, instead of sprawl. Infilling development is environmentally sound in towns and cities with existing infrastructure, reducing the exorbitant costs to maintain a huge, spread-out network of roads, pipes, wires, and fire response. Infilling development will also have significantly fewer impacts in relation to the SANDAG 2050 transportation plan where the County is to meet state goals to reduce greenhouse gases. This will be difficult to impossible if developers are allowed to locate populations of people far away from available jobs, force them to commute, and offer no public transportation.

Finally, an essential consideration in the SEIR will be the individual and cumulative impacts to recreational activities, particularly bicycling in North County San Diego. The North County bicycling community consisting of many formal and informal groups and individuals has developed in this area as a result of excellent road cycling opportunities, climate, and aesthetic beauty. It is currently a world class hub for training of professional, amateur and recreational cyclists, e.g. the Race Across the West, and the Race Across America which both begin and traverse their way through the County. The economic and public health safety impacts of sprawling development throughout North County to an existing strong cycling community must be effectively analyzed. For example, there is an increasing concern of existing rural road standards with the new 3-foot clearance rule between vehicles and bicycles (California Vehicle Code § 21760). Changes to rural and semi-rural land use designations that increase traffic numbers will further heighten this concern to the detriment of health, safety, efficient traffic flow and potential loss of life by motorists and cyclists.

Please feel free to contact me for additional clarification and testimony.

Sincerely,

/s/ Lyn Townsend

Forest Ecologist (Ret), USDA Natural Resources Conservation Service

Cyclist (active): North County Cycling Club, North Coast Velo, Ranchos, Bonsal Wednesday Group

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