

Slovick, Mark

From: Annie Ryan DiMeglio <annierd614@gmail.com>
Sent: Monday, July 28, 2014 12:18 PM
To: Slovick, Mark
Subject: Comments for new DEIR

Hello Mark,

I'm sure all issues that I could discuss here have been stated and restated over and over. All of them extremely important and real to all of us who live in the target zone of Accretive.

I won't go into all of them again, here, but please count me in as agreeing with all the facts and details that my neighbors have sent in.

One issue that I haven't seen much discussion on is those of us who have horses and other livestock animals. NO discussion has been proposed on this issue from what I can see and it is a very critical and important one! Evacuating with trailers full of horses and livestock is very time consuming and scary, not being able to get out is one of our biggest fears! Allowing all the extra traffic could mean devastation to us horse people on a much larger scale!

What really brought it home was the recent fire activity, specifically the fire on the hill behind the mobile home park off of Old Hwy 395, between the 76 and West Lilac.

I live 2.3 miles east of the bridge off of West Lilac, East on Covey lane. Covey Lane is a puney, quiet road with NO EXIT on either end. During that fire Old Hwy 395 was closed off at the bridge at West Lilac. People who had exited the freeway (15) because it was also closed were searching, searching, searching for a way to get out. Hundreds of cars came up and down our little roads only to hit dead ends where they had to turn around creating MORE TRAFFIC JAMS.....ON OUR LITTLE TINY DEAD END ROAD!!

My husband, myself and our neighbors watched in disbelief as a steady stream of cars, for hours on end, came up our road. All I could think about was if I HAD TO GET OUT I COULDN'T!! I have 8 horses, my next door neighbor has 2, another neighbor has 2 and numerous other neighbors have several, all within a few blocks of West Lilac!!

So, perhaps this issue of large animal evacuation can be brought up as well. It is definitely a huge issue which little attention has been paid! Many of us were drawn and sold on the Valley Center area because we are horse people and Valley Center was APPARENTLY horse savvy and horse friendly. Allowing this new development which will hamper our evacuation roads beyond measure is INSANITY!!

Thank you for your attention to this matter, it really could be a matter of life & death for both humans and horses.

Annie Ryan-Di Meglio
10115 Covey Lane
Escondido, CA 92026

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Annie

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Love is the absence of judgment.....Dalai Lama



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FOR
SPEED

Slovick, Mark

From: Floann Sannipoli <fmsannipoli@gmail.com>
Sent: Friday, July 25, 2014 5:15 PM
To: Slovick, Mark
Cc: Floann Sannipoli
Subject: Lilan Hills Ranch REIR : 3800 12-001(GPA), 3810 12-001 (SP), 3100 5571 (TM), 3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018 (STP), HLP XX-XXX, SCH 2012061100
Attachments: freeway fire.jpg

To: County of San Diego
Planning and Development Services

Water. Roads. Fire.

WATER

Our natural resources for water are not in huge supply these days. No news there! They haven't been for years. What makes anyone think water is all of a sudden going to be available in great quantities anytime soon?

As a rural home owner who has in the past been asked to conserve, and who currently is watching the surrounding countryside become a virtual wasteland of tree skeletons from un-watered groves I marvel at the County even considering a development of this size in such a dry brush area which is already straining from lack of resources (water).

How is this possible? Can one County entity actually ask farmers and homeowners to conserve on water while another branch in the County is considering approval of density housing in that same area? In some cases even on the same parcel numbers! Please answer this in a way that makes sense!

ROADS

We already know the WEST TRIANGLE (West Lilac Rd., Castle Creek and Old 395) have some of the County's oldest and underdeveloped roads in existence. They are curvy, narrow, with out bike lanes, often edging up to sliced granite bedrock on one side and sheer 60 plus foot drops on the other, without room for width expansion. How on earth does the County intend to deal with the increase of road traffic under these conditions?

And then there is the Lilac Bridge, a two lane wonder which functions beautifully at the current capacity. Add 3,000 (or even HALF THAT!) more cars....and now we have bottleneck, backed up traffic on narrow, curvy roads...a recipe no doubt for one accident after another. How does the County intend to ensure the safety of every driver (not to mention bicyclists of which we have hundreds!)) under these conditions?

FIRE!

This last May I was caught on the I-15 going North to home during one of the many fires in North County. Because of freeway closer (Fallbrook Fire) I was stuck on the I-15 between Deer Springs Rd. and Gopher Canyon Rd. for over 2 hours. This was the "normal" traffic flow of that time of day, but because of road closure we were given detour through ONE LANE!!! Fortunately the fire never hit the freeway in this particular fire (the next day proved otherwise), and people eventually got to where they were going. Mind you, this section of road should normally take a few minutes of travel time, yet I was there for over 2 hours. Had there been more traffic (1,500 -3,000 more due to this proposed development) trying to get off, I suppose that number would have escalated to 3 hours.

My point is that with all the Temecula and further northern cities traveling the I-15 corridor everyday, all day, we cannot add in one large leapfrog development 3,000 more cars without adding lanes to the freeway, without adding more exits and unrams, without adding an ulterior exit route from THEIR SITE of Lilac Hills Ranch! And this cannot be done WITHOUT taking away private property, i.e. eminent domain.

So what is the County's intention on this?

My three concerns:

WATER (where is it coming from and at whose expense? And don't say at the developer's expense...when water gets used, we are all affected!)

ROADS (three and four lane Lilac Hills Ranch roads emptying onto West Lilac and Castle Creek...at whose expense? Again, when cars travel on the road it affects us all!)

FIRE! (The last BIG fire in this area was in 1970 - Gopher Canyon Fire. That spells 44 years of unburned DRY brush. Given the road situation, it spells disaster and death.) Is the County willing to place all of those living in this area at risk? For what? \$\$\$? I want an answer!

As a reminder I would like to share a photo of a fire on the I-15 a few years back and how things went awry because people could not get through...Please see attachment...

floann sannipoli

9542 COVEY LANE ESCONDIDO, CA 92026

760-731-2116

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (IM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018
(STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT REVISED EIR PUBLIC REVIEW PERIOD
June 12, 2014 through July 28, 2014

DRAFT EIR COMMENT SHEET

Tuesday, June 17, 2014
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

SEE NEXT PAGE

(Attach additional pages as needed)


Signature 7/28/14
Date

STEFANO SEVIGNY
Print Name

3863 SUMAC CT.
Address

FALLBROOK CA 92028
City State Zip Code

760-828-8564
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 28, 2014

Comments

7/28/14

1. Please explain how the report addresses how a high urban density project complies with the General plan of an agricultural environment?
2. Please explain how the plan mandates compliance with standard FMZ throughout the project for ?
3. Please explain how you will gain access to private roads for easements in a fire emergency?
4. How do you plan on mandating access to private roads during an fire emergency?
5. Did the owners to the properties agree to allowing public access for possibly over 1,4000 occupants?
6. Please give the time required to accomplish blasting and the length of time required to do removal and placement of fills?
7. Explain how specifically the road expansions will be funded by Cal Trans to make the roads safe for cyclists?
8. Explain how the project allows for aerial spraying in the pre existing agricultural areas in a urban dense development while still allowing for sustainable farming.
9. Has anyone done studies on the weight the Lilac bridge will support in the event of gridlock loading of cars, animal and possessions during an evacuation? What is the maximum continuous amount of weight the bridge will support?

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
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WRITTEN COMMENT FORM

Please read
 following page

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
 County of San Diego
 Planning & Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123
 FAX #: (619) 694-3373
 e-mail: Mark.Slovick@sdcounty.ca.gov

Isabella Sevigny
 Signature Date

Isabella Sevigny
 Print Name

3863 Sumner Ct
 Address

Falbrun CA 92028
 City State Zip Code

760 419-1210
 Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 23, 2014

**Comment page regarding Lilac community
7/23/14**

1. Please explain how the report addresses how a high urban density project complies with the General plan of an agricultural environment?
2. Please explain how the plan mandates compliance with standard FMZ throughout the project for ?
3. Please explain how you will gain access to private roads for easements in a fire emergency?
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Slovick, Mark

From: Jan Shuttleworth <jsfiredog@live.com>
Sent: Monday, July 28, 2014 11:49 AM
To: Slovick, Mark
Subject: Lilac Hills Ranch DEIR

Dear. Mr. Slovick,

I know that you are probably getting multiple letters of residents expressing their concern over this project. I appreciate the fact that you read and will take into consideration the major issues with this project. I will make this short and sweet as I assume there are many more letters to read.

I have lived at 31354 Rodriguez Rd Escondido for over 10 years. I did my share of apartment, condo and tract housing. I am now retired and choose this area because of the calm surreal environment it provides. This project has too many flaws to list. The increase of traffic and congestions on these existing roads should be enough to halt it. Also heard that sewage may have to be trucked out of the area. Are you kidding me???? This should have been a red flag that this project is poorly designed from the beginning. I have attended numerous planning committee meetings and neighborhood meetings and I can't think of a single person that lives in the proposed area that supports the size of the development in this area. This developer has somebody in their back pocket otherwise anybody with common sense can see that this is absolutely the wrong area for this project. Allowing this developer to modify the GP2020 for such a poorly planned project in the first place will only benefit the developer, no one else.

Public safety should be the concern of the San Diego Planning group, Board of Supervisors and the Planning Commission. It is apparent that it is the least of their concerns. I have a lot of experience with public service and safety. I worked at Deer Springs Fire Protection District in the early 80's as a Firefighter before it became Cal Fire. I retired from San Diego City Fire Department as a Firefighter Paramedic. Combined service of almost 30 years. This area is not meant for the density proposed. As it is now we could use more fire stations. This is a recipe for disaster if a fast moving vegetation fire goes through this area. I guarantee lives will be lost.

On top of everything else current residents will most likely see increases in property taxes, decrease in property value, and an increase in water rates. Again I can't stress enough the valid concerns we have. Please reconsider changing the GP2020. Now is the time to step up and just say no to this deep pocket developer.

Thank you in advance for consideration in this matter.

Jan Shuttleworth
31354 Rodriguez Rd
Escondido, CA 92026
619-454-6099

July 28,2014
County of San Diego
Planning and Development Services
Re: Lilac Hills Ranch Project

Dennis & Jeanne Simmons
10034 Covey Lane
Escondido Ca 92026

To Whom It May Concern:

I am writing this letter to express my opposition the Lilac Hills Ranch Project due to several factors that should reasonablyA project that is well designed with the area and topography preclude this project to be approved.

I moved into this area from Encinitas in March of this year to be able to enjoy space and views from my new home and the gardening space afforded by the size of my property. I was unaware of this project until I saw a sign posted at the Old 395 and West Lilac Road interchange. After contacting Mark Slovik I was directed to the web page where I would be able to access the plans of the project.

I was disappointed after I had read and reread the project outlines, the general plan, traffic plan, grading plan and the various mitigations and numerous exceptions requested by the developer to make the project would mesh with the rural character of the area as it is.

The impact to the current residents from the traffic plan alone is enough to disapprove this project. West Lilac Road east bound from Old 395 to Covey Lane is a substandard light collector with NO intermittent turn lanes, little or no shoulders and a dangerous at best bike lane. With marginal "improvements" limited to the proposed round a bouts, which were called unfeasible by the independent engineer hired for peer review, to eliminating the north shoulder altogether and having a "conceptual parkway and bike lane" on the south side do nothing to improve traffic circulation in this area.

The size and concept of this project is completely contrary to the County of San Diego's own General Plan and screams leap frog development where building "town center" style projects near the area considered the center of each area. This is neither near the town center of Valley Center or Bonsall. The idea that this would improve the value of life in this area is a hollow chant, it would instead degrade the quality and peace now enjoyed with five times or more of the current traffic load on the current substandard roads that this project would feed onto.

A project that is well planned and designed to fit in with the nature and topography of the area taken into consideration would not need to request exceptions from dozens of State, County and Local Development plans and guidelines. It would not have to fight "hostile" residents to make minimal improvements to a roadway that will still be substandard, not serve the purpose nor help the residential, commercial, bike or equestrian traffic that exists now. It would not eliminate or endanger what is considered to be Crucial California Agricultural Land, would not eliminate endangered species habitat and it would certainly not be built in a Critical Fire Danger Area where drought is a way of life.

The road and traffic plan are unacceptable.

The degradation to agricultural and endangered species land is not acceptable.

The impact on already strained infrastructure is unacceptable even with the proposed improvements (in twenty years) is unacceptable.

I respectfully request that the Planning and Land use Committee reject this proposal for what it is, sprawl.

I respectfully request the members of the Board of Supervisors reject this proposal for completely ignoring the General Plan and the work done by them and by their staff to put it in place.

Dennis & Jeanne Simmons

Slovick, Mark

From: templarstansmith <templarstansmith@hotmail.com>
Sent: Wednesday, June 18, 2014 10:21 AM
To: Slovick, Mark
Cc: chev stan smith
Subject: Lilac Hills Ranch

Hello Mark:

Ive been following the subject proposal for some time and am impressed with the sustainable aspects of the housing being offered -- especially the provisions for the 468 SFR senior's homes -a low impact-on-the-land solution. This meets society's responsibility to meet housing needs for its citizens in a "green" way. Both older and younger generations (who could occupy the urban homes vacated by the seniors) will benefit while reducing net carbon emissions through less commuting.

Sincerely Yours,
Dr. Stanley Smith, DBA
Rural Land Economist

Johnson Sedlack

ATTORNEYS AT LAW

Raymond W. Johnson, Esq., AICP, LEED GA 26785 Camino Seco, Temecula, CA 92590
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County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 130
San Diego, CA 92123
Mark.Slovick@sdcounty.ca.gov

VIA E-MAIL

Re: LILAC HILLS RANCH SPECIFIC PLAN DRAFT REVISED EIR (SCH NO. 2012061100)

To the County of San Diego:

The following comments are submitted on behalf of concerned residents and environmental groups regarding the Draft Revised Environmental Impact Report (RDEIR) for the Lilac Hills Ranch Specific Plan Project.

The conclusions of the RDEIR are not supported by substantial evidence and additional mitigation is required, for at least the following reasons:

I. Land Use Impacts

The Project represents a dramatic change in land use intensities than those contemplated by the recently adopted County General Plan. The site is currently zoned agriculture and rural residential. The Project proposes to change land use designations to allow for General Commercial in the "town center" areas and Urban Residential in the residential areas. In turn, high-density residential development as well as commercial uses will be allowed. Such a marked change to the land use designations and the resulting development constitutes a significant land use impact. Available mitigation includes a reduction in the proposed densities of the project. The fact that the applicant desires a certain amount of development does not override the significant land use impacts associated with the Project.

The General Plan is described on the County's website, as follows:

This document is the first comprehensive update of the San Diego County General Plan since 1978 and is the result of the collective efforts of elected and appointed officials, community groups, individuals, and agencies who spent countless hours developing a framework for the future growth and development of the unincorporated areas of the County. This document replaces the previous General Plan and is based on a set of guiding principles designed to protect the County's unique and diverse natural resources and maintain the character of its

rural and semi-rural communities. It reflects an environmentally sustainable approach to planning that balances the need for adequate infrastructure, housing, and economic vitality, while maintaining and preserving each unique community within the County, agricultural areas, and extensive open space.

The General Plan directs future growth in the unincorporated areas of the County with a projected capacity that will accommodate more than 232,300 existing and future homes. This growth is targeted to occur primarily in the western portions of the unincorporated County where there is the opportunity for additional development. Compared to the previous General Plan, this update reduces housing capacity by 15 percent and shifts 20 percent of future growth from eastern backcountry areas to western communities. **This change reflects the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services**, while respecting sensitive natural resources and protection of existing community character in its extensive rural and semi-rural communities. The General Plan provides a renewed basis for the County's diverse communities to develop Community Plans that are specific to and reflective of their unique character and environment consistent with the County's vision for its future. (emphasis added)

The Project is antithetical to the General Plan where it does not further the goal of sustainable growth. It locates a high density residential development away from other development.

The Project also conflicts with the specific policies of the County's General Plan including, but not limited to, General Plan Policy LU-1.2 which prohibits leap-frog development. The text of this policy is, as follows:

LU-1.2 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, **leapfrog development is defined as Village densities located away from established Villages** or outside established water and sewer service boundaries. (emphasis added)

The Project qualifies as such a prohibited development where it proposes a high-density development among rural and agricultural uses and away from employment and regional commercial centers as well as other "villages." Moreover, the Project is not a LEED-ND development, in that, among other things, it does not constitute a smart-growth development; nor will the Project obtain such a LEED certification according to the RDEIR and the Specific Plan.

The Project additionally conflicts with GOAL LU-2: "Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character." The Project conflicts with GOAL LU-7: "Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character." The Project conflicts with policy LU-7.1: Agricultural

Land Development. Protect agricultural lands with lower-density land use designations that support continued agricultural operations.

The General Plan states for “villages and town centers,” “[c]ompatibility should be directed through the Community Plan, where the community’s character is defined in greater detail, and the Zoning Ordinance. Because Village development will occur as infill or redevelopment, compatibility takes on a greater scope, accounting for the immediately surrounding area as well as the overall character of the Village.” (emphasis added) The Project *conflicts* with the relevant community plans in terms of zoning and goals and policies for the development of the area. Specifically, the community plans already designate certain areas for “village” development; the Project seeks to add another “village” designation to accommodate the intensity of development proposes. The Project further does not satisfy or promote the goals and policies relative to the Villages and Town Center development model set forth in the General Plan. While describing itself as a “village” development, the Project is not infill or redevelopment of an existing site; nor is it new development near *existing villages*, as described in the General Plan.

The General Plan further has policies for commercial development:

LU 11.3 Pedestrian-Oriented Commercial Centers: Encourage the development of commercial centers in compact, walkable configurations in Village centers that locate parking in the rear or on the side of the parcel, use transparent storefronts with active retail street-fronting uses, minimize setbacks, and *discourage “strip” commercial development*. “Strip” commercial development consists of automobile-oriented commercial development with the buildings set back from the street to accommodate parking between the building and street.

LU 11.5 Large-Format Retail Stores: Allow large-format retail uses, typically referred to as “big box stores,” *only where the scale of the use and design is compatible with the surrounding areas*. Large-format retail typically means retail stores with floor plans that are larger than 65,000 sq. ft. (emphasis added)

The Specific Plan does not appear to prohibit strip malls or “big box” stores which would not be compatible with surrounding areas, and which would certainly undercut the “town center” development concept.

The Project does not also propose office development “in proximity to housing” in line with LU 11.6 Office Development: Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.

Next, the Valley Center Community Plan and the Bonsall Community Plan specifically seek through their respective goals and policies to retain the rural and agricultural character of the area. Despite the proposed land use amendments, the Project conflicts with numerous policies of these applicable land use plans. This is a significant impact of the Project. The finding of consistency with these plans is not, and cannot, be made.

In total, the finding of “no significance” in the area of land use impacts is not supported, and the proposed amendments to the various land use plans do not resolve the environmental effects associated with the amendments.

II. Visual Resources

Mitigation Measure M-V-2 is impermissibly uncertain where it calls for a delay of the construction of each phase of development to allow for the landscaping from the previous phase to “mature.” Neither the terms “delay” nor “mature” are defined; and it is not certain that such a delay can even be effective. We submit that incorporating more mature landscaping at the outset would alleviate visual impacts.

A further mitigation measure for visual impacts could include limiting the height of buildings. As proposed, the project proposes buildings 35-feet in height.

Also, would not a restriction on the hours and/or days of construction also minimize visual impacts during construction? The RDEIR discloses that impacts are significant in part because of “night-time lighting” during construction. The construction ordinance permits construction until 7 p.m. Limiting the hours of construction to daylight hours during winter months would lessen impacts.

Lastly, the RDEIR does not discuss cumulative lighting impacts from the Project together with other planned projects.

III. Schools

The RDEIR concludes that the Project would generate the need for new schools due to the Project’s student population. The RDEIR further concludes that with the project capacity at existing schools would be exceeded. Other school facilities might need to be expanded or re-opened to accommodate the Project’s students. This must be deemed a significant impact of the Project. The Specific Plan sets aside land for the construction of a school but states that this school may not be built, or may be a charter or private school. To the extent that student capacity at area schools is exceeded when and until a school is built, the impacts must be deemed significant.

Moreover, the RDEIR repeatedly references the construction and operation of the school to address other impact areas and to bolster the notion of the “smart growth” development concept, particularly in support of the idea that the Project reduces vehicle miles traveled due to the provision of the school. Since the school may not be built, it is not appropriate to claim that the existence of the school will lessen other impacts. When and until the school is built, residents and students will be forced to drive to other areas outside the Project boundaries.

IV. Growth Inducement

The Project plainly has the potential for significant growth-inducing impacts where it brings housing, infrastructure and roadways to an underserved or otherwise undeveloped area. As such, it creates the potential for new development.

The RDEIR claims on Page 1-49 that the Project could be growth-inducing but the potential impacts are too speculative because the specific projects are unknown at this time, and that “growth-inducing features of the project would be evaluated at the time future projects are identified and processed.” It is only at the cumulative or broad level that growth-inducing impacts may be realistically assessed for a project that proposes the comprehensive development of the planning area. The Project will bring infrastructure and roadway expansions to the area as well as substantial population growth to the otherwise rural community (See p. 3-171 “The project would introduce a new village consisting of new infrastructure, including roadways, water supply systems, and utilities...”). The growth-inducing effects of the project must be deemed a significant project impact at this time.

V. Air Quality

Operational air quality impacts are significant due in large part due to mobile emissions. The Project is predominately single-family residential in nature, with limited commercial and mixed use development. As the Project is heavily weighted in favor of residential uses, it does not create a jobs-housing balance, and, therefore, should be expected to generate significant operational mobile emissions. Page 54 of the Air Quality Technical Report concludes that the Project will result in significant air emissions for ROG, CO, and PM10 for all phases beginning with Scenario C. By full build-out, the project will vastly exceed thresholds of significance. The REIR speaks as if these air quality effects are a foregone conclusion. The Project could be redesigned to allow for a more mixed-used development concept with greater emphasis on office or light industrial uses to reduce miles traveled by residents, and therefore reduce significant operational air quality emissions. Notably, no office/professional or limited industrial land use designations are sought for the project (although the Specific Plan apparently foresees some single-tenant office uses).

The Project proposes only two mitigation measures for operational air quality impacts. First, these measures are uncertain as the informational materials will be provided to “consumers” prior to operation of individual phases. Hence these materials and/or website information would be provided to homeowners or lessees at the outset of the Project but not necessarily to subsequent owners. Second, we submit there are numerous mitigation measures available to reduce air quality impacts which must be adopted for the Project:

- All spaces utilizing refrigerated storage, including restaurants and food or beverage stores, shall provide an electrical hookup for refrigeration units on delivery trucks. Trucks incapable of utilizing the electrical hookup for powering refrigeration units shall be prohibited from accessing the site. All leasing documents shall include these requirements and provide that violation of those provisions will constitute a material breach of the lease that will result in the termination of the lease. Because of the fact that these terms of the lease are designed to benefit the public, the public shall be considered to be a third party beneficiary with standing to enforce the requirements of the lease.*

- Install catalytic converters on gasoline-powered equipment.*
- Electrical powered equipment should be utilized in-lieu of gasoline-powered engines where technically feasible.*
- Utilize only electrical equipment for landscape maintenance.*
- Prohibit idling of trucks for periods exceeding three minutes.*
- Provide electrical vehicle (“EV”) and compressed natural gas (“CNG”) vehicles in any vehicle fleets.*
- Install EV charging facilities for a minimum of 10% of all parking spaces.*
- Install a CNG fueling facility.*
- Provide preferential parking locations for EVs and CNG vehicles.*
- Plant shade trees in parking lots to provide minimum 50% cover to reduce evaporative emissions from parked vehicles.*
- Plant at least 50 percent low-ozone forming potential (Low-OFP) trees and shrubs, preferably native, drought-resistant species.*
- Plant Low-OFP, native, drought-resistant, tree and shrub species. Consider roadside, sidewalk, and driveway shading.*
- Orient 75 percent or more of buildings to face either north or south (within 30 degrees of N/S) and plant trees and shrubs that shed their leaves in winter nearer to these structures to maximize shade to the building during the summer and allow sunlight to strike the building during the winter months.*
- Provide grass paving, tree shading, or reflective surface for unshaded parking lot areas, driveways, or fire lanes that reduce standard black asphalt paving by 10% or more.*
- Electrical outlets shall be installed on the exterior walls of all residential and commercial buildings (and perhaps parking lots) to promote the use of electric landscape maintenance equipment.*
- Prohibit gas powered landscape maintenance equipment within residential, commercial, and mixed-use developments. Require landscape maintenance companies to use battery powered or electric equipment **or** contract only with commercial landscapers who operate with equipment that complies with the most recent California Air Resources Board certification standards, or standards adopted no more than three years prior to date of use or any combination of these two themes.*
- Provide a complimentary cordless electric lawnmower to each residential buyer.
- Create a light vehicle network, such as a neighborhood electric vehicle (NEV) system.*
- Provide preferential parking for carpool/vanpool vehicles.*
- Provide subsidies or incentives to employees who use public transit or carpooling, including preferential parking.*
- Provide direct, safe, attractive pedestrian access from project to transit stops and adjacent development.*
- Provide direct safe, direct bicycle access to adjacent bicycle routes.*
- Connect bicycle lanes/paths to city-wide network.*
- Design and locate buildings to facilitate transit access, e.g., locate building entrances near transit stops, eliminate building setbacks, etc.*
- Construct transit facilities such as bus turnouts/bus bulbs, benches, shelters, etc.*
- Provide a display case or kiosk displaying transportation information in a prominent area accessible to employees.

- All buildings shall be constructed to LEED Gold standards.*
- Design buildings for passive heating and cooling and natural light, including building orientation, proper orientation and placement of windows, overhangs, skylights, etc.*
- Construct photovoltaic solar or alternative renewable energy sources sufficient to provide 100% of all electrical usage for the entire Project.*
- Install an ozone destruction catalyst on all air conditioning systems.*
- All Project buildings must be constructed to allow for easy, cost-effective installation of solar energy systems in the future, using “solar ready” features such as, clear access without obstructions (chimneys, heating and plumbing vents, etc.); designing the roof framing to support the addition of solar panels; and installation of electrical conduit to accept solar electric system wiring.
- Purchase only green/ renewable power from the electric company.*
- Install solar water heating systems to generate all hot water requirements.*
- Use non-potable water for all landscaping.

(* Would reduce impacts to GHGs as well)

Conclusions regarding air quality impacts during construction are based on assumptions that project design features are requirements of the project. These design features must be made a requirement of the project through enforceable mitigation measures.

The Air Quality Technical Report indicates that a large reduction in emissions in the areas of PM 10 and PM 2.5 are taken due to project mitigation. It is not clear that the mitigation measures proposed would reduce, to this great extent, the emissions so that emissions can be determined to be less than significant. It is also not clear that the trip lengths described by the RDEIR are realistic and appropriate given the substantial distance from the Project site to major employment centers.

Construction impacts are deemed significant when in viewed in conjunction with the operational phases of the project. As impacts are significant on a cumulative basis, we submit there are numerous additional construction mitigation measures which must be adopted for construction air quality:

- Gravel pads must be installed at all access points to prevent tracking of mud onto public roads.
- Install and maintain trackout control devices in effective condition at all access points where paved and unpaved access or travel routes intersect (eg. Install wheel shakers, wheel washers, and limit site access.)
- All roadways, driveways, sidewalks, etc., should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Pave all construction roads.
- Pave all construction access roads at least 100 feet on to the site from the main road.
- The maximum vehicle speeds on unpaved roads shall be 15 mph.
- Limit fugitive dust sources to 20 percent capacity.

- Require a dust control plan for earthmoving operations.
- When materials are transported off-site, all material shall be covered, effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.
- All streets shall be swept at least once a day using street sweepers utilizing reclaimed water trucks if visible soil materials are carried to adjacent streets.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite.
- Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 24 hours.
- Extend grading period sufficiently to reduce air quality impacts below a level of significance.
- The simultaneous disturbance of the site shall be limited to five acres per day.
- Adequate watering techniques shall be employed to mitigate the impact of construction-related dust particles.
- Any vegetative cover to be utilized onsite shall be planted as soon as possible to reduce the disturbed area subject to wind erosion. Irrigation systems required for these plants shall be installed as soon as possible to maintain good ground cover and to minimize wind erosion of the soil.
- Any on-site stockpiles of debris, dirt or other dusty material shall be covered or watered three times daily.
- Any site access points within 30 minutes of any visible dirt deposition on any public roadway shall be swept or washed.
- A high wind response plan shall be formulated for enhanced dust control if winds are forecast to exceed 25 mph in any upcoming 24-hour period.
- Implement activity management techniques including a) development of a comprehensive construction management plan designed to minimize the number of large construction equipment operating during any given time period; b) scheduling of construction truck trips during non-peak hours to reduce peak hour emissions; c) limitation of the length of construction work-day period; and d) phasing of construction activities.*
- Develop a trip reduction plan to achieve a 1.5 AVR for construction employees
- Require high pressure injectors on diesel construction equipment.*
- Restrict truck operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicles.*
- Require the use of CARB certified particulate traps that meet level 3 requirements on all construction equipment.*
- Utilize only CARB certified equipment for construction activities.*
- The developer shall require all contractors to turn off all construction equipment and delivery vehicles when not in use and/or idling in excess of 3 minutes.*
- Restrict engine size of construction equipment to the minimum practical size.*
- Use electric construction equipment where technically feasible.*
- Substitute gasoline-powered for diesel-powered construction equipment.*
- Require use of alternatively fueled construction equipment, using, e.g., compressed

- natural gas, liquefied natural gas, propane, or biodiesel.*
- Use methanol-fueled pile drivers.*
- Install catalytic converters on gasoline-powered equipment.*
- Require the use of Alternative Diesel Fuels on diesel equipment used. Alternative diesel fuels exist that achieve PM10 and NOx reductions. PuriNOx is an alternative diesel formulation that was verified by CARB on January 31, 2001 as achieving a 14% reduction in NOx and a 63% reduction in PM10 compared to CARB diesel. It can be used in any direct-injection, heavy-duty compression ignition engine and is compatible with existing engines and existing storage, distribution, and vehicle fueling facilities. Operational experience indicates little or no difference in performance and startup time, no discernable operational differences, no increased engine noise, and significantly reduced visible smoke.
- Electrical powered equipment shall be utilized in-lieu of gasoline-powered engines where technically feasible.*
- All forklifts shall be electric or natural gas powered.*
- Suspend use of all construction equipment operations during second stage smog alerts.*
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.*
- Provide dedicated turn lanes for movement of construction trucks and equipment on-and off-site.*
- Reroute construction trucks away from congested streets and sensitive receptor areas.*
- The applicant shall be required to solicit bids that include use of energy and fuel efficient fleets.
- Configure construction parking to minimize traffic interference.*
- Prior to the issuance of a grading and building permit, the applicant shall submit verification that a ridesharing program for the construction crew has been encouraged and will be supported by the contractor via incentives or other inducements.*
- Minimize construction worker trips by requiring carpooling and providing for lunch onsite.*
- Provide shuttle service to food service establishments/commercial areas for the construction crew.*
- Provide shuttle service to transit stations/multimodal centers for the construction crew.*

Finally, does the construction air quality analysis account for all off-site trips including the 100 material delivery truck trips and 260 employee commute trips disclosed at RDEIR p. 2.8-17? All truck and employee construction trips must be accounted for in the analysis.

VI. GHGs

Despite resulting in significant operational air quality impacts, the RDEIR remarkably finds that GHG impacts are less than significant and that *no* mitigation measures for GHG impacts are necessary. These conclusions are not supported.

Firstly, reductions in GHG construction emissions by 33% were taken. It is not clear that such a large emissions reduction is appropriate based on the available information.

With regard to operational emissions, the GHG analysis states that trip lengths were calculated based on default model numbers based on the type of trip, for instance, "home to work." It is not clear that the "home to work" trip lengths is accurate or realistic for this project. In reality, most workers will travel much farther to employment centers than the average 8.95 miles stated in the RDEIR. Two of the closest urban areas with employment centers are Escondido and San Marcos, both more than 15 miles from the project; Rancho Bernardo, Poway, and San Diego are much farther and could more realistically be assumed to be the major employment centers that would serve the Project. The Project itself does not propose office or light industrial development thereby providing employment opportunities for residents. A reasonable alternative would include greater emphasis on employment-generating uses for project residents.

GHG emissions must be deemed significant. Firstly, the Project represents a new source of GHGs and will result in a *mitigated* total of approximately 33,000 MTCO₂e. This represents a new source of GHG impacts and mitigation is required (*i.e.*, the "bright line" test). Second, impacts must be deemed significant under the "performance standard." The claim that emissions are less-than-significant because they are reduced by 18% over the "unmitigated" scenario gives a false impression of the Project's impacts. For instance, the largest reduction is taken for "area source" emissions: the GHG analysis accounts for a 33% reduction in the area of "area" source emissions for using natural gas fireplaces and the "elimination" of wood burning fire places. Thus the "unmitigated" scenario was calculated using wood burning fireplaces. This is illusory where wood fireplaces are not the baseline scenario; that is, the Project compares itself against a version of the project with more harmful features in order to claim an environmental benefit. This is not a fair assessment of the Project's environmental impact (indeed, wood burning fireplaces are now illegal in Los Angeles, Orange, Riverside, San Bernardino and Riverside counties; the EPA meanwhile is currently considering imposing regulations on wood burning fireplaces). In other words, this is a reduction of GHG impacts on paper only. A 33% reduction due to the "elimination" of wood burning fireplaces allows the Project achieve the 18% reduction necessary to meet the "performance threshold" standard. However, this calculation of impacts is not appropriate. Anything less than comparison of the project from a proper "business as usual" scenario is unacceptable.

The reductions credited in the area of "vehicle miles traveled" are also illusory. The Project proposes predominately a residential development with limited retail and service-based commercial uses. The Project does not provide a meaningful opportunity to reduce vehicle miles traveled by proposing office and light industrial uses. Moreover, as noted above, the school may not be developed; if it is not, residents with children will have to drive farther to school and students will not necessarily be able to walk to school, also increasing emissions.

In total, the assumptions in the GHG analysis are illusory and unfounded. If the assumptions are tailored in a more realistic fashion, GHG impacts are likely above the "performance threshold" standard.

Impacts must also be deemed significant pursuant to the CEQA Guidelines thresholds of significance. Existing emissions are calculated at roughly 563 MTCO₂e; the Project's emissions are calculated at approximately 33,000 MTCO₂e. This is a significant impact.

Impacts must also be deemed significant in that the Project does not support or further County General Plan policies relative to emissions reductions. The Project does not locate development near or within *existing* development as provided in County General Policies. The commercial uses are limited in nature and do not create opportunities for employment for residents; the school may not be developed, as repeatedly stated in the EIR; and, besides the parks, there are seemingly no other “civic” uses. The Project is not consistent with regulations in that it does not provide *diverse* opportunities for *jobs*, housing and services, *and is not supportive of mass transit*. The low-income housing may also not become a reality, and it is not clear that the low income residents will have employment opportunities close to home, in order to eliminate vehicle trips. The Project conflicts with and undermines County policies to reduce vehicle miles traveled. As such, per the threshold of significance, GHG impacts are significant.

Finally, the design features which allegedly lessen GHG emissions are not requirements of the project as they are not adopted as enforceable mitigation measures. In fact, the GHG analysis states, in Section 8.3.2, that the design features may be eliminated and the applicant may, as an alternative, “study” whether other methods would be equally effective. All GHG Reducing Specific Plan policies and design features must be made enforceable requirements of the Project in order to claim their environmental benefits.

VII. Agricultural Resources

The proposed mitigation for agricultural impacts is uncertain and unenforceable. For instance, the measures states that the applicant shall be given the option to implement one of three measures, or a combination of two or three measures, in order to mitigate direct impacts due to the loss of Prime Farmland or Farmland of Statewide Importance. The RDEIR also relies on this measure for significant cumulative impacts due to the loss of farmland. This measure is impermissibly uncertain where the applicant may chose a conservation easement either within the cumulative project area or a location approved by the Director of P&DS. Thus, decisions about agricultural mitigation may be made at some future date, and the measure allows the applicant to “piece-meal” the mitigation; arguably, the contiguous nature of agricultural lands should be maintained in order to provide effective mitigation.

Agricultural zoning conflicts is a significant project impact. (Issue 2, p. 2.4-13) The current zoning is Limited Agriculture. There are potentially significant agricultural impacts as the project site is adjacent to Agricultural Preserve No. 88. This creates land use conflicts pursuant to the adopted threshold of significance.

Also, for the same reason that impacts relative to the placement of a park, institutional, and age-restricted uses near existing agricultural uses may result in the conversion of farmland to non-agricultural uses, the placement of a school near these agricultural uses must also be found to be a significant impact of the project. The school use is within 1,000 feet of the agricultural operations and must be deemed a significant impact of the project.

VIII. Noise

The conclusions of the RDEIR relative to noise impacts are unsupported and further analysis and mitigation is required.

Noise mitigation measures, particularly M-N-3 through M-N-7, are impermissibly deferred and not certain of lessening impacts below significance thresholds. Mitigation is based on the preparation of future acoustical studies and requirements that the studies identify future “mitigation measures” to comply with the applicable noise standards. Under CEQA case law, the deferral of mitigation in this manner is only appropriate where there are practical reasons why mitigation cannot be formulated at the time of project approval, and when specific performance standards are outlined. The Project does not satisfy these standards for mitigation deferral.

Section 2.8.6.1 mentions with respect to M-N-1 that a 6-foot high wall and site specific design and design features would be implemented but these are not mandatory mitigation measures. As to M-N-2, impacts are significant because, although certain possibilities for mitigation are laid out, these are not enforceable standards. As to M-N-10, the study of rock crushing noise levels is deferred to a later date; thus, it is not certain that a 350-foot setback is adequate to protect existing residences.

As to Impact N-3, this measure is not shown to be infeasible but, perhaps, less desirable. All feasible mitigation measures must be adopted for significant project impacts.

Phases of construction activities such as grading and blasting must be made requirements of the Project through enforceable mitigation measures. If construction activities overlap, impacts could be far worse than anticipated.

The RDEIR notes that future residences within the project site could be located as close as 50 feet from active construction and that noise levels could be as high as 88 dbA during “peak construction activity.” The RDEIR claims that these noise levels will be “sporadic” and states that impacts will be less than significant *if* construction would occur in increments of approximately 10 acres. The finding of no significance in this area is not supported (see, p. 2.8-25 [Impact N-11 only pertains to construction near existing on-site properties]). Noise levels to on-site, future residences are shown to exceed applicable noise standards and the “temporary” nature of these impacts is neither demonstrated nor a justification of a finding of less-than-significant. Also, there is no seemingly no requirement that construction occur in 10 acres of less increments.

Available mitigation for noise impacts includes limiting construction to Monday-Friday, to lessen impacts to on-site residences. Other available noise mitigation include:

- Where technically feasible, utilize only electrical construction equipment.
- During construction, the contractor shall require that all contractors turn off all construction equipment and delivery vehicles when not in use and prohibit idling in excess of 3 minutes.
- Provide a “windows closed” condition requiring a means of mechanical ventilation (e.g., air conditioning) for all buildings.
- Provide upgraded windows with a minimum Sound Transmission Class (STC) rating of 34 for all buildings and/or require the installation of double-paned windows.
- Ban heavy trucks near vibration sensitive uses.

- To minimize or eliminate motor-derived noise from construction equipment, contractors shall utilize construction equipment that either uses electricity or alternative fuels (such as natural gas or propane) where technically feasible.

IX. Traffic

Conclusions regarding traffic impacts are not supported and further analysis and mitigation is required. For instance, it is not shown that the types of trips and trip lengths described are accurate.

Regarding public transit issues, the Project purports to achieve County goals of furthering public transit opportunities and access but the analysis assumes that adequate public transit exists to service the Project. This is not shown to be accurate.

Traffic mitigation measures are uncertain, unenforceable and improperly deferred. For instance, the RDEIR does not adequately explain why mitigation for Impact TR-12 is considered infeasible. The mitigation described for both TR-12 and TR-16 (M-TR-7) is confusing and does not explain why the mitigation described, if any, is infeasible.

As to Impact TR-20, could not the Project be conditioned to pay the relevant fair share fees, when, and if, a fee-based program is established? As the Project will be constructed in phases over the next 10 years, it is reasonable to assume that new transportation programs may be formulated in that time period. Similarly as to Impacts TR-30 through TR-37, the Project should be conditioned to provide fair share mitigation when a program becomes available and/or to continually consult with Caltrans regarding available mitigation programs.

X. Water Supply

The RDEIR concludes that adequate water supply exists for the Project from the purveyor, but do predictions about adequate water supply include the Project?

Will the Project employ recycled water?

XI. Population and Housing

The RDEIR glosses over this impact area, noting that impacts to population and housing were deemed less than significant at the Initial Study phase.

The CEQA Guidelines, Appendix G state that a project will have significant population and housing impacts if it will (a) induce substantial population growth in an area either directly or indirectly; (b) displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or (c) displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. The RDEIR discusses only subsection (c). However, impacts are potentially significant under subsection (a). The Project proposes to bring thousands homes and residents as well as infrastructure and roadway improvements to a rural area, thereby creating the potential to induce substantial population growth on a direct and indirect basis. Furthermore, the number of projected residents could not easily be ascertained from the RDEIR. Is

July 28, 2014
County of San Diego

the project consistent with population projections in relevant land use and planning documents? If not, this, too, is a significant project impact.

As a related matter, the RDEIR does not contain a meaningful discussion of regional project effects due to the Project.

XII. Alternatives

The RDEIR evaluates two development alternatives in addition to the Project, which, arguably, does not constitute a “reasonable” range of project alternatives as required by CEQA. The RDEIR considers two “no-project” alternatives and a General Plan Consistent Alternative. This later alternative is derivative of the No-Project/Legal Lot Alternative, where both develop the land according to the existing General Plan Designation of Semi-Rural (while the General Plan Consistent Alternative would yield double the number of lots, 110 versus 49 under the Legal Lot Alternative). Like the No-Project Alternatives, the General Plan Consistent Alternative would not meet basic project objectives. Only *two* alternatives would meet “basic” project objectives which include a “mixed use” development concept.

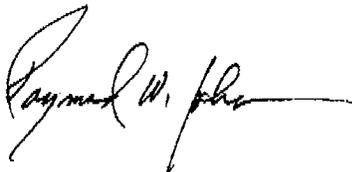
The RDEIR nonetheless concludes that the General Plan Consistent Alternative is the “environmentally superior alternative.” A more appropriate environmentally superior alternative is the Reduced Intensity Alternative which is shown to be environmentally superior in the areas of at least air quality and traffic *and* which would meet basic project objectives. Thus, absent findings of infeasibility, the Reduced Intensity Alternative must be adopted.

Finally, we note that a statement of overriding considerations is not appropriate until all alternatives and mitigation measures have been determined to be infeasible based on substantial evidence in the record. This would include a finding that the Reduced Intensity Alternative is infeasible for technical, legal and/or financial reasons based on evidence in the record.

XIII. Conclusion

Thank you for your consideration of the above comments in your preparation of the Final EIR and as you review the scope and direction of the proposed project.

Sincerely,



Raymond W. Johnson
JOHNSON & SEDLACK

Slovick, Mark

From: Larry S <thunderjet100@gmail.com>
Sent: Sunday, July 27, 2014 9:28 AM
To: Slovick, Mark
Subject: Comments for LILAC HILLS RANCH, Environmental Log No. 3910 12-02-003
Attachments: Hello Mark Slovick.tmd

Hello Mark,

In case you cannot open the attached, I have included it below.

Thank you.

LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018
(STP), HLP XX-XXX, SCH 212061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT REVISED EIR PUBLIC REVIEW PERIOD
June 12, 2014 through July 28, 2014

DRAFT EIR COMMENT SHEET

Tuesday, June 17, 2014

COUNTY OF SAN DIEGO

Planning & Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

WRITTEN COMMENT FORM

I believe this response is a waste of time as this is just a formality or hurdle for Accretive to clear. There is an overwhelming opposition to this proposed project in the area that it is to be built. I have not talked to one person in the area of the proposed project who is not opposed to it and this goes back to when the project was first announced years ago. The only people to benefit from this project will be Accretive and the supervisor or supervisors that are keeping this plan alive. The support for this project can be determined by following the money trail from Accretive, if that concealed trail can be determined. There is no logical reason to support this project.

I will state a few of the most obvious reasons not to allow this proposed development.

1. **THIS IS A CLEAR VIOLATION OF ZONING LAWS.** Why do we have zoning laws unless it only applies to homeowners and not large developers that can have the law changed to exempt them for their benefit. The residents in the area of the proposed project adamantly oppose the project.
2. **FIRE EVACUATION DANGER.** There was a fire a couple of months ago at highway 15 and 76. Highway 15 was closed to northbound travel. Also the bridge on West Lilac road can only support one lane of traffic even if West Lilac Rd. were widened. With the proposed population density of this project there will be gridlock at the most critical time.
3. **WATER SHORTAGE.** We all know California is in a severe drought situation and more people will use more water. Accretive has addressed this with spin. The water needed for this high density housing project will be a simple case of robbing Peter to pay Paul.

Larry Stainbrook 7-27-2014

10038 Covey Lane

Escondido, CA 92026

760-749-6984

Slovick, Mark

From: Larry Evie <evielarry@gmail.com>
Sent: Sunday, July 27, 2014 9:22 AM
To: Slovic, Mark
Subject: LILAC HLLS RANCH, Comment Sheet, Environmental Log No. 3910 12-02-003 (ER)
Attachments: Lilac Hills Ranch protest 7-2014.tmd

Hello Mark,

In case you cannot read the attached, my response is in the body of this email.

LILAC HILLS RANCH

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),

3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018

(STP), HLP XX-XXX, SCH 212061100

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Tuesday, June 17, 2014

COUNTY OF SAN DIEGO

Planning & Development Services

5510 Overland Avenue, Suite 310

San Diego, CA 92123

WRITTEN COMMENT FORM

Why does the Board approve a General Plan and make zoning laws if a company willing to pay can have them changed for it's own benefit, not for the benefit of the community? The Plan, which was approved in 2011 by the Board of Supervisors, was written to "provide clear, unified framework for community development and conservation" and as " a consistent framework for land use and development decisions consistent with an established community vision". The Lilac Hills Ranch Planned Community is not in the public interest of the County and is not in agreement with the community vision.

Lilac Hills Ranch is not in agreement with the County of San Diego General Plan in many ways: housing density, increasing the use of fossil fuels and their elimination into the air, destroying environmental preservation and more.

How many times does the North County constituents have to say "no" to housing that has higher density than the zoned two acre minimum? No matter what Accretive Investments, Inc. states will be done to alleviate the traffic density, to ensure safe evacuation in case of a fire or other emergency, the proposed high density population can not ensure as much or more safety to current residents. There are two roads west to the freeway and a third road which goes to Valley Center, these are the evacuation routes.

Greenhouse gas emissions cannot be lowered by building Lilac Hills Ranch. A walkability community may be feasible closer to urban areas but not in rural areas. This walkability community will not provide enough jobs for the residents and there is no public transit which can provide transportations to the jobs needed to support the "walkability" community. "Bike to work" is not feasible due to the distance to jobs and the terrain. People moving to Lilac Hills Ranch will have to drive to work, thereby emitting more gas emissions.

We are in a severe drought, to which there is no end in sight, and the County is planning to build more housing in an area where the agriculture community needs the water.

Please, Board of Supervisors, do not think that Bill Horn is working in this community's best interest or for what this community wants. The Newland Sierra Project (aka Miriam Mountains) is another example of his ignoring and continuing to bring before the Board projects his constituents have said over and over that they do not want. As shown by the last election, he was narrowly defeated. Since this is his last term, he has nothing to lose by ignoring his constituents.

Thank you.

Evelyn Stainbrook 7-27-2014

10038 Covey Lane

Escondido, CA 92026

760-749-6984

July 14, 2014

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

re: Accretive Group's Lilac Hills Ranch Development

I must begin by saying that I find it unfathomable that we are even continuing to discuss the Accretive Group's development - now politically renamed "Lilac Hills Ranch". I expected it to be killed when first presented. My family and I have lived in this area for over 25 years. When we outgrew our first area home on Covey Lane, off West Lilac, and searched for a replacement, we considered moving into Valley Center for the "conveniences" of a short trip to schools, churches, ball fields, libraries, gas stations, and markets. We researched the growth plans and ultimately decided that the convenience of living in town was outweighed by the solitude of remaining in our agricultural area where the county had dedicated itself to maintaining increasingly large parcels and limited growth - in writing, no less. We bought a flower farm on West Lilac Road and continue to endure the hardship of having to plan ahead to secure fuel or necessities in neighboring cities before heading home or having our children ride the bus for an hour to get to and from school. It is a sacrifice but it's worth it. The choice was a conscious one. People live in VC proper because they choose NOT to live "without". They want the market, dry cleaner, library, gas station. We do not.

Now we are told that our long range planning for our future was futile because it has been trumped by a Developer's short term plan to turn a profit. After the county spent many years and million of dollars to create the "General Plan", they are now willing to scrap it in favor of the monies that will be generated by allowing Accretive corporation to profit from their ill conceived purchase of tracts of unincorporated land. But, first, the Developer must convince the San Diego County "planners" to make extensive zoning changes. Their operating plan reads like a military mission:

1. Buy up agriculturally zoned land from individuals who accept the unsolicited offer to purchase their property during an economic down turn.
2. Attempt to convince the neighbors and the Valley Center Community Planning group that they will not be impacted by the destruction of hundreds of acres of relatively open land. Failing this...
3. Move on to the residents of Valley Center Proper (who reconsider the growth that has been planned for their town center) and slant the story to become one of knights in armor swooping down to save the residents from the approved growth plan by magically relocating it in someone else's backyard. Ignore the fact that this was not Accretive's actual intent nor will it make a difference in whether Valley Center expands or not. If Accretive had been able to acquire acreage in the middle of Valley Center proper, it would be using these same sales tactics to convince your board to let them put their huge development off Cole Grade Road instead of along small winding West Lilac Road.
4. Convince the county that the local planning group is negligent in some regard and should be overruled.
5. Now include politicians eager for an expanded tax and voter base and – voilà – somehow putting the cart before the horse seems like a coup rather than a critical blunder in investment strategy.

On a very personal note, our lifestyle will change drastically. We had planned to retire on this farm, but now are making alternate arrangements if construction on this monstrosity progresses. We can't and won't live with the noise, the horrific traffic, the loss of horse trails, or the increased danger to our property and person that will come with Lilac Hills. We envision roads congested to the point that every trip will resemble the ones when we get stuck behind a school bus, a trash truck, or a flock of bicyclists or are met head-on by a vehicle attempting to pass on a narrow two-lane road. The I-15 backup will be like Temecula's. While I'm sure we'll have a grocery store nearby, we won't have the peaceful quiet, the wildlife, the endless view of groves, or the dark night sky. We'll have to live with the increase in fire danger and regulations that will make it almost impossible to continue to farm in this area (think burn permits, aerial pest control, and water availability). We will be forced off of our land to find a new place for our children and grandchildren to visit even after having done everything right in terms of decision making. This nightmare has shattered my confidence in San Diego county governments' willingness to protect its constituents from big business.

On a more positive note, looking toward the immediate future, if this Development does move ahead, there will be nothing to stop us and our neighbors from splitting our land into much smaller parcels and selling them off to the highest bidder because the county will have, effectively, thrown all of their careful planning out of the window and opened the door to unrestricted growth. This fact should always be in the back of your mind when listening to area land owners who support Lilac Hills Ranch. Or better yet, we could sell to the next Big Developer -and there will be a next- who will put in another planned community, shopping mall, warehouse, manufacturer, or other nuisance. But next time it will be in Your backyard because ours will be gone. You can anticipate that the legal challenges to anything that remains of the General Plan will begin almost immediately.

Make no mistake - Lilac Hills is not pitching anything that will reduce growth in VC, but only trying to turn a huge profit. Even with LHR, the town of Valley Center's fate is sealed. It will still see growth (after all it's surrounded by huge Las Vegas style casinos and THAT part of the plan hasn't changed), but now there will be a whole city next door! An oasis-type tribute to Developers. It doesn't matter what they call this Development – it's wrong to reward them with a profit for making assumptive business decisions and then expecting San Diego county officials to roll over, play dead, and accept the fact that big business/government and greed trumps individual property owners. Do the only acceptable thing. Do what should have been done when first presented with Accretive's proposal. Support county planning and zoning. Prove that you cannot be cajoled, intimidated, and bribed into trashing years of research and long range planning. Show that you take seriously the responsibility to protect OUR rights. Say NO to this development and YES to those who trusted you.

Please listen to us. Help us. Retain the character of San Diego County's agricultural communities.

Carole and Ed Sullivan and Family
10057 West Lilac Road
Escondido, CA 92026
760-749-6360

cc: Valley Center Community Planning Group

8975-201 Lawrence Welk Drive
Escondido, CA 92026

July 21, 2014

Mr. Mark Slovick, Project Manager
County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 310
San Diego, Ca. 92123

RE: Lilac Hills Ranch Project

Dear Mr. Slovick:

I am a resident of Champaign Village, which lies just south of the proposed Lilac Hills Ranch Project. I echo many of the negative comments and points others have made in regard to the development of the Project. However, to me one point has not been emphasized enough, and that is the lack of sufficient fire escape routes in this area. I speak from my personal experience.

My wife and I received the reverse 911 call to evacuate our home early in the morning in October, 2007, as the result of the Witch Creek Fire heading west from Valley Center towards I-15. It took us an hour to get out of Champaign Village driveway and up to Deer Springs Road! I am not exaggerating, and I am still emotionally charged over that experience! It was an experience I wish you and the Lilac Hills Ranch developers could have experienced - - - unable to move on old Highway 395, road clogged with vehicles, including hundreds of horse trailers, inching your way along with thousands of others, hopping to make it to the freeway and escape the danger, only to reach Deer Springs Road and find residents from the Deer Springs area also trying to escape via their only route, and all of us reaching the same single lane I-15 overpass with traffic lights still operating with computer controls ignoring the plight of us thousands trying to flee! It was a nightmare, and one I trust I will not have to face again.

The issue is there are woefully few exits out of this area given the topography, population density, and non-existing alternative routes. Adding a large number of new residents will only exacerbate this situation, and create the absolute potential for a human tragedy. And this situation will not be "mitigated" with additional signal lights, left or right turn protected lanes, and the like. In fact, adding traffic lights only makes the log jams worse with us honest citizens waiting for the appropriate green light to proceed, with fires licking at our heels!

Seriously Mark, I cannot believe anyone who experienced the Witch Creek Fire evacuation would approve that Evacuation Plan that is attached as the Project's Exhibit K. It indicates all those people will attempt to escape via two minor roads which were clogged to a standstill during a previous emergency. I know this sounds emotional, but honestly, the developers and approving authority individuals like you will be responsible for the loss of lives that will come if the Project is approved as proposed, and another wild fire occurs like we have had and will no doubt experience again.

Sincerely,



Robert L. Suttie

Slovick, Mark

From: Alma Tindall <amactindall@gmail.com>
Sent: Sunday, July 27, 2014 6:37 PM
To: Slovick, Mark
Subject: Lilac Hills Ranch development

Dear Mr. Slovick:

I am against the proposed development of Lilac Hills Ranch. Below are my concerns and those of many residents of this beautiful valley.

- 1.- Where will we get the water for this big development? We are currently in a drought situation as we have been for many years and it is not improving. How will this project help with our water problems?
- 2.- The roads are windy and narrow. They cannot handle more traffic safely. For the safety of all current residents in the area, this project should be denied. The roads cannot be improved enough to make it safe or feasible for the present or future traffic needs.
- 3.- In our fire prone area, current residents and certainly not 3 thousand more will be able to get out of harms way when a firestorm occurs anywhere in this entire region. VC has already had deaths and injuries related to evacuation. Please do not put us all in danger.
- 4.- This project does not follow the General Plan. Why have one if it is only for some and not all? These developers do not and will not ever live in this area and have no vested interest in keeping it a pleasant rural agricultural community and safe place to live.
- 5.- The General Plan was devised at huge taxpayer expense and enormous amount of hours before it was approved by the county Supervisors only to be immediately dismantled by greedy developers.
- 6.- There is no infrastructure for this development and they will not be going to supply adequate infrastructure for the long term growth after they start building cookie cutter track houses all in a row. How is this developer going to insure that we have the proper infrastructure to handle this development which is the size of the city of Del Mar?

In short, we don't want this development, period. It will destroy what remains of a once pristine place to live. Water, Traffic, Schools and fire safety are just a few of the issues that are of concern to most of the residents of Valley Center.

William and Alma Tindall
30411 Dendy Sky Lane
Valley Center, CA 92082

Slovick, Mark

From: Lyn Townsend <lynrtownsend@gmail.com>
Sent: Monday, June 16, 2014 7:59 PM
To: Slovic, Mark
Cc: Eric Townsend Esq; Sara Townsend Biologist
Subject: Comments on the Draft REIR - Project Name - Lilac Hills Ranch.

Importance: High

To:
PLANNING & DEVELOPMENT SERVICES 5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123

I am a West Lilac Road resident whose property abuts the furthest northeast corner of the proposed accretive development. I am hereby sending this comment to the address above per the PDS Notice dated 12Jun2014.

In regard to Appendix K - Evacuation Plan

(http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC_HILLS_RANCH/LILAC-HILLS-RANCH.html),

my comment concerns fire coming abruptly from the southeast or the south, residents will push out chaotically and en masse in vehicles onto West Lilac Road heading west. Education efforts and "ready, set, go" rationale for the full build-out population cannot be relied on for an orderly sequenced evacuation. Upon seeing smoke and fire from the southeast and south, residents will drive like hell creating a bottleneck on the West Lilac bridge which is only a 2 lane bridge that is about 40 years old. A local long term bicyclist talked to a bridge inspector several years ago who was examining the bridge. The inspector stated the bridge has been pushed to the furthest extent on its support caps due to small earthquakes over the past several decades. The potential bottleneck of cars, their weight, an aging bridge and a severe fast moving fire (like those within 2 miles of my house last month, May 2014) could spell disaster for area residents. Although native brushy habitats are highly flammable, avocado/citrus groves and intermixed weedy/brushy areas can rapidly preheat and carry fire quickly to adjacent flammable fuels. The need for a direct evacuation route west to US 395 or a new 4 lane bridge to replace the existing 2 lane bridge could partially mitigate potential human loss of life. Even the existing low density population may overtax the capacity of the bridge during a chaotic evacuation. We've been lucky so far, but I do not think "luck" should be included in the justification to go forward with this development.

Mr. Lyn Townsend, Forest Ecologist, B.s., M.s.
9430 West Lilac Road
Escondido, CA 92026
Cell 360.903.8756

3800 12-001 (GPA), 3810 12-001 (SF), 3100 5571 (1M),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-018
(STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT REVISED EIR PUBLIC REVIEW PERIOD
June 12, 2014 through July 28, 2014

DRAFT EIR COMMENT SHEET

Tuesday, June 17, 2014

COUNTY OF SAN DIEGO

Planning & Development Services
5510 Overland Avenue, Suite 310

San Diego, CA 92123

WRITTEN COMMENT FORM

We do not want the traffic and
congestion from this proposed project.
Also the values of the houses in this
area will significantly drop. Especially,
because people purchased their homes
with a country atmosphere many home
owners and renter will be robbed of the
rolling hillside views and be upset.

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdccounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, JULY 28, 2014

Signature MB Date 7/28/14
Print Name Adriane Bliss-Williams
Address 31832 Rocking Horse Road
Escandale Ct 92026
City Escandale Ct State CA Zip Code 92026
Phone Number 760 802 5985

Slovick, Mark

From: Administrator <kyranlis@gmail.com>
Sent: Monday, July 28, 2014 3:42 PM
To: Slovick, Mark
Subject: Comments

Dear Mr. Slovick,

I am strongly opposed to the Lilac Hills Ranch Development. The General Plan does not support that and it is not part of the plan for Valley Center. The Planning group in Valley Center has worked hard with some other developers to establish a desirable downtown core for Valley Center. They have drawn up a north and south village which will provide needed housing for the town. It is in keeping with the General Plan and the vision for the area. The infrastructure will grow out from the downtown there is established infrastructure. The schools, churches, post office, stores and other amenities will be located there in the downtown core of town. There is no need for housing out in the edges of town and spot development. This is categorized as urban sprawl.

The roadways near and around this proposed development cannot handle that kind of traffic. I have studied the traffic reports and information concerning the roads. There is no capability of widening those roads enough to safely handle the additional traffic. Accretive has no right of way on the roads they are preparing in 4 and 5 phases for entering and exiting the development. I will not give up my easement for them or will I pay more taxes to enable them. The developer does not live in this area and never will. He will not look back at the damage caused while counting his bank account.

The W. Lilac bridge cannot be widened and will require a rebuild or another bridge to accommodate the traffic generated from this kind of dense housing.

The roads will be clogged and lives will be in jeopardy if there is a necessity to evacuate as there was in 2007, 2008, and a recent fire earlier this year. School busses and large trucks cannot pass on parts of W. Lilac and Circle R Drive. The school busses are not even allowed on parts of W. Lilac. Valley Center had loss of life and serious injuries a few years back in a fire. How many lives will you put in jeopardy just to fatten the wallet of this developer?

Trucking of effluent from 300 homes would require up to 9 trips a day of a heavy truck. Where will this sewage be stored while waiting for trucks to take it away? That is not a feasible suggestion for many reasons. Can you promise it will be odorless, safe, and sanitary? I had to get a septic system put in when I built my house. If these development cannot qualify for septic systems for each house, then it is reasonable to assume the homes cannot be built.

Can you promise that the infrastructure that is part of the other phases will actually be built and maintained properly? If the first phase is built and the economy falls apart and there is no more building then what happens to the infrastructure included in the subsequent phases? Accretive will sell those phases off to other buyers, if in fact, there are other builders that can and will buy and develop the infrastructure as presented currently. This is a gamble at best. Can you gamble the lives of the current residents or that western side of Valley Center for the sake of this developer?

I have lived in this area for over 35 years and I have seen changes come. Change is expected, but it is expected to be 2+acre lots per dwelling and not condensed lego type houses. If I am not mistaken, that is the purpose of the General Plan. It insures that there will be proper growth and not urban sprawl. It is designed for all the people living there and not some out of town greedy developer who doesn't want to pay for the infrastructure needed to sustain that kind of housing.

Please consider my comments and do the right thing for all the people that the county is supposed to be working for. Please deny this project as it is the wrong idea in the wrong place.

Thank you for your time.

Nutritia Wilson
Countryside Pools
PO Box 529, Bonsall, Ca 92003

From: Don Wood [<mailto:dwood8@cox.net>]

Sent: Friday, June 20, 2014 2:05 PM

To: Slovic, Mark

Cc: Horn, Bill; Jacob, Dianne; Cox, Greg; Roberts, Ron; Giametta, Salvatore; McClain, Tim

Subject: Please post this article to your public comments file on the proposed Lilac Hills Ranch sprawl development project

<http://www.citylab.com/design/2013/09/sprawl-still-sprawl-even-if-its-green/6756/>

Don Wood
4539 Lee Avenue
La Mesa, CA. 91941
619-463-9035
Dwood8@cox.net



Sprawl Is Still Sprawl, Even If It's 'Green'

The most sustainable development in the wrong location will create more environmental problems than it will solve.

KAID BENFIELD |  @Kaid_at_NRDC | Sep 3, 2013 |  17 Comments

Image



Does the lead photo with this article look like a good place to put over 1,700 new homes on a little over 600 acres? What if I told you it was working agricultural land in a remote location 45 miles north of San Diego and 61 miles south of San Bernardino, California? What if I added that the developer is doing everything it can to make the project green? Those are the questions currently facing San Diego County authorities.

The environmental importance of development location

Unfortunately for the proposed project's sponsor, the most significant factor in determining the environmental impacts of real estate development is the project's location. Even the greenest development in the wrong location will create more environmental problems than it will solve. Of course, that doesn't stop developers' and architects' green puffery. Heck, they may even be well-intentioned, trying to do the greenest internal design on a site whose non-green location cannot be overcome. But trying to green a project doesn't make wishes come true.

I've written about this sort of thing multiple times, criticizing a purported "net zero" energy-efficient development in Illinois that is totally automobile-dependent, and pointing out that higher density, though generally an asset to green performance, won't cure locational problems. I've criticized the American Institute of Architects and even the U.S. Green Building Council for undervaluing location in their green awards programs. (At least USGBC has taken a major positive step by adopting LEED for Neighborhood Development, a certification program that rewards good locations along with other green features. More about LEED-ND later in this article.)

Development locations far from existing cities and towns cause substantial environmental problems, disrupting agricultural lands and natural ecosystems; requiring the spread of resource-consuming infrastructure, including new road capacity that brings more runoff-causing pavement to watersheds; attracting ancillary sprawling development nearby; and causing major transportation impacts.

I can't over-stress that last point: On average, we use more energy and emit more carbon getting to and from a building than does the building itself. Peer-reviewed research published by the federal EPA shows that even green homes

in conventional suburban locations use more energy and emit more carbon than non-green homes in transit-served city neighborhoods. The problem only gets worse when the development is located beyond suburbia on truly rural land. Indeed, the most exhaustive research I know on how land use affects travel behavior found that location – measured by, among other things, the distance from the regional center – is by far the most significant determinant of how much household driving will occur, over time, from a given location.

Simply put, green sprawl is still sprawl.

"An I-15 sustainable community"

This brings me to a proposed "I-15 sustainable community" (the developer's tagline) some 45 miles north of San Diego and 61 miles south of San Bernardino, California. I'm tempted to say that the site is in the middle of nowhere, but that's not quite fair. It is more accurate to say that it is decidedly rural, home to working orchards, cropland and rangeland on rolling terrain near Lancaster, Pala, and Weaver Mountains near the north edge of San Diego County. There are scattered rural residential enclaves and a few small, newer suburban developments within a few miles.





The proposal's [draft environmental impact report](#) describes the setting this way:

The project site is generally characterized by agricultural lands and gently rolling knolls, with steeper hillsides and ridges running north and south along the western edge. Existing land uses in the surrounding area include residential dwellings that range from suburban to semi-rural densities, along with agricultural uses and vacant lands.

What the site is not is a good place to put 1,746 new homes at an average density of 2.9 units per acre.

Perhaps that is why it is illegal under current law, which zones the land for agricultural use. That is also its designation in the county's general plan, recently adopted after more than a decade of deliberation. The developer is seeking to change the zoning and to change the plan to accommodate the development.

The developer's argument for the proposal, to be called [Lilac Hills Ranch](#), is that it will be internally walkable, with amenities within a 10-minute reach of most residents; that it will cluster development so as to maintain green space; that it

will utilize green technology in building design; and that it will create "a neighborhood grounded in traditional small-town values embracing 21st century design and sustainability."

To be honest, that sounds pretty nice if it were located adjacent to existing development instead of leapfrogging across vacant land. But it isn't; I took a look at some numbers. Because the site is unusually shaped and mostly open land, it is hard to find a point within it that is cataloged in searchable databases. So I picked a spot on the north edge of the site on West Valley Road, the main access to the site from I-15, and ran it through some calculators.

Location by the numbers

Google Maps says the north side of the project is 14 miles from San Marcos, the nearest town with significant employment, 16 miles from downtown Escondido, and 22 miles from Rancho Bernardo. As noted, it is 45 miles from downtown San Diego. We're talking about very long work commutes. There is no transit nearby and, even under the best of circumstances, unlikely to be any future transit that would go conveniently from the development to San Diego County's scattered work sites.



My spot's Walk Score was 2. Pretty low, eh? Walk Score basically measures how close a site is to shops and conveniences. Ideally, it finds walkable locations with ratings above 60 or so that have things within walking distance. The average Walk Score for Escondido is 51. For San Diego city, the average Walk Score is 56. The average in Los Angeles is 66. A Walk Score of 2 means that this

site is not near much, to say the least.

I also ran it through the Abogo calculator maintained by the Center for Neighborhood Technology, which displays driving rates and costs, along with emissions data, for given locations. The average household in the general vicinity of the proposed development emits 1.02 metric tons of carbon dioxide each month just from transportation. This is 46 percent above that of the San Diego region as a whole.

The developer apparently ~~wishes~~ believes that Lilac Hills Ranch would actually reduce greenhouse gas emissions by up to 40 percent compared to a "business-as-usual" scenario, mostly because of the project's internal walkability and planned commercial spaces that would absorb trips that otherwise would be made outside the project. Nothing in the literature of transportation research suggests that would be the case.

First, let's parse what "business as usual" means. What the developer is really claiming is that the project would reduce emissions compared to an even more sprawling development in the same location. The developer is not claiming, nor could it, that the project would reduce emissions below the average for the metropolitan region or even below the amount that would be experienced in an alternative site closer to Escondido or San Diego. As noted above, the most exhaustive research on the subject (Professors Ewing and Cervero's epic "Travel and the Built Environment," published in the Journal of the American Planning Association) found that proximity to downtown and other major destinations, not internal design, was the most significant factor in determining driving rates. ("Almost any development in a central location is likely to generate less automobile travel than the best-designed, compact, mixed-use development in a remote location," write the scholars.)

Look, this proposal basically would replace working agricultural land with a commuter suburb, albeit with some very nice internal amenities for its residents.



Dan Silver, MD, executive director of the Endangered Habitats League, summed the League's position in a letter to the San Diego County planning office, which is apparently reviewing the proposal:

This project would create a commuter-based 'bedroom' community in an agricultural portion of Valley Center. It would shred the consensus reached for the Valley Center community as part of the historic General Plan Update, just adopted in 2011. No compelling planning rationale or deficit in housing capacity is present to justify this proposed amendment.

The League is not alone in its criticisms. The Valley Center Planning Group voted 11-1 to send a scathing critique of the proposal to the planning office, according to [an article by David Ross](#) published last month on the local news site Valley Road Runner. If anything, the Planning Group's language was even stronger than that of the Endangered Habitats League, reports Ross:

Key take-aways from the response the Planning Group approved Monday night:

- The project is leapfrogging and therefore contrary to the good planning principles upon which the General Plan Update was based. It plops urban building densities into a rural agricultural area without appropriate existing infrastructure. **A much better project alternative than any proposed is within the Downtown Escondido Specific Plan Area**, says the review.
- In most major areas of the project, the rationale presented by the applicant is going to change the General Plan requirements to be aligned with what it wants to do. According to the group, this defeats the efforts by all who participated in the 12-year-long, \$18 million county General Plan Update project that was approved by the Board of Supervisors only two years ago.

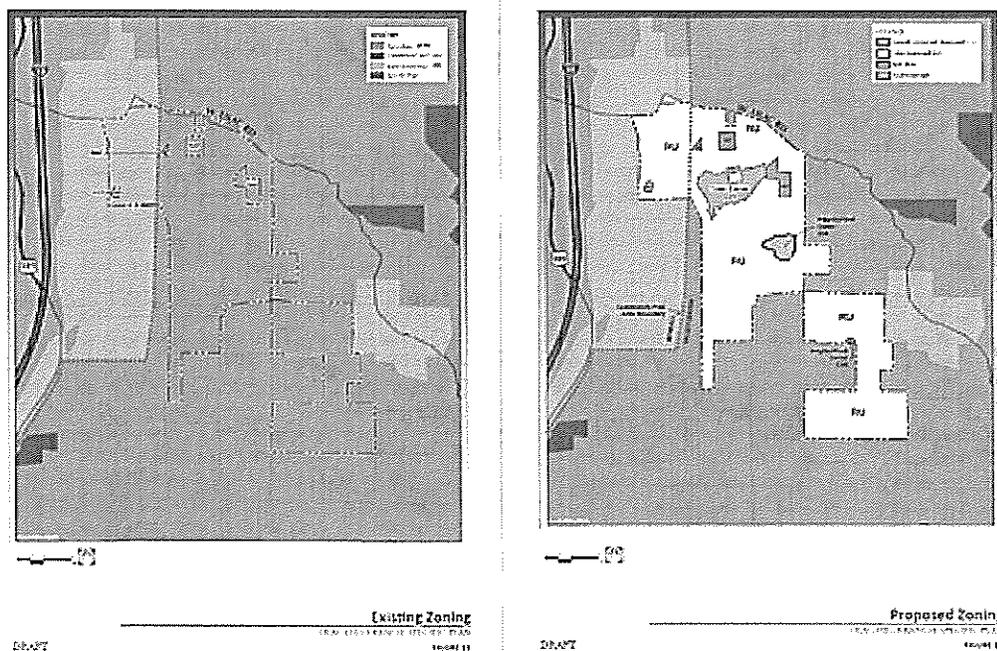
It seems to me that the planning office should be encouraging green revitalization and redevelopment within cities and towns, and encouraging the addition of new green features to existing suburbs. In some cases, it might be reasonable to review even a new mega-project such as this one if it were not only green but also adjacent and connected to existing development. But, assuming the worst, what's the point of having a planning office if it approves leapfrog development that violates its own plan?

The project, LEED-ND, and California planning law

Adding rhetorical insult to environmental injury, a document prepared in support of the development asserts that the proposal is "designed to meet the environmental standards of" LEED for Neighborhood Development, the voluntary green rating system mentioned at the top of this article. (See our Citizen's Guide.) Seriously? Then file an application and get a certification that proves it. Heck, you could at least apply to the US Green Building Council, which administers LEED-ND, for a "prerequisite review" that for a fraction of the cost and time of full certification will determine whether you meet the rock-bottom minimum locational standards of the system.

Given the serious doubts raised about this proposal, if I were a planning official for San Diego County I would politely ask that the developer do just that as a condition of further discussion of any zoning change or planning amendment. Speaking for myself, my informal opinion based on about a dozen painful hours of reviewing planning documents in this case is that there is not a snowball's chance in hell that this proposal qualifies for LEED-ND certification or even that it would pass the minimum prerequisites to be considered.

For one thing, LEED-ND requires a minimum average density of seven dwellings per acre, not the 2.9 at issue here. For another, the LEED-ND locational prerequisite is generous, but not generous enough to let this project slip through. (I should know, because I was its principal author.) To be considered, a project must qualify as (1) infill; (2) adjacent and connected to a minimum amount of previous development; (3) served by existing or fully committed minimum transit service; or (4) surrounded by a minimum number of specified, pre-existing "neighborhood assets" within walking distance. In other words, a project can't be smack in the middle of rural land at a long distance from existing development. Well, it can be, but it won't – and shouldn't – qualify for green certification under LEED-ND.



Current agricultural zoning (left) and proposed change to "residential urban" (right)

Finally, in 2008 California passed what many of us believed at the time to be

landmark legislation ("SB 375") requiring that each metropolitan area in the state, including San Diego County, develop specific, long-range land use and transportation planning documents that meet assigned targets for reducing emissions of greenhouse gases from transportation. A lot of people in the state, including my NRDC colleague Amanda Eaken, worked long and hard to ensure that the new law would be fair to developers and municipalities as well as protective of the environment. They succeeded at that, and won the support of a broad range of nonprofit and commercial interests.

Basically, each metro area must develop a "Sustainable Communities Strategy" as part of its transportation plan. The SCS must anticipate population growth and housing needs and allocate them to areas within the region that can accept them consistent with the law's environmental aims. The state's Air Resources Board must review and certify that the plans are adequate to meet their emissions-reduction targets. Municipalities are expected to conform to the regional plans, and transportation funding and development approval benefits flow to the priority growth areas.

The whole point of SB375 was to encourage development within or close to existing development and existing city and town infrastructure. (And, no, contrary to the developer's assertions here, being close to an Interstate highway is not what the framers had in mind when they spoke of existing city and town infrastructure.)

The Sustainable Communities Strategy for San Diego County, crafted by the San Diego Association of Governments and adopted two years ago, was built on the premise that the county's general land use plan would remain in place. As a result, this development not only challenges the plan; it also flies in the face of all the hard work and good faith that went into the region's Sustainable Communities Strategy pursuant to SB375. This should matter, not just a little but a lot. As far as I could tell from the documents I reviewed, the SCS isn't even mentioned.

The bottom line: in another place, this might be a great green development, though I would want to improve its design for better walkable density and transit access. Its on-site premises do appear to have some merit to them. But this location is so, so wrong that it negates what might otherwise be the

development's environmental assets. It's a shame because, in the end, the development basically amounts to little more than pretty sprawl.

This post originally appeared on the NRDC's [Switchboard](#) blog, an Atlantic partner site.

About the Author



Kaid Benfield is the director of the Sustainable Communities and Smart Growth program at the Natural Resources Defense Council, co-founder of the LEED for Neighborhood Development rating system, and co-founder of Smart Growth America. [MORE](#)

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July 24, 2014

Mark Slovick
County of San Diego Planning and Development Services
5510 Overland Ave., suite 310
San Diego, Ca. 92123

re: Public comments for the Lilac Hills REIR

Dear Mr. Slovick,

I believe the only option that should be considered is the one that sticks with current zoning and requires any development to follow the General Plan as it currently exists. I understand that some variances will and should be given on individual properties because of harm that was created especially when zoning was changed and adversely affected an individual owner and his ability to complete plans for his property that had been based on then current zoning.

Let's be clear, Lilac Hills Ranch in no way falls into that category.

The General Plan has provided for the housing needs for the foreseeable future. Valley Center has chosen to follow current stated goals of providing areas for growth, particularly higher density growth, near existing infrastructure. Planners across the country have recognized this need. As you move away from existing infrastructure, density decreases. That makes this development inappropriate and unnecessary, and since it is unnecessary, no special considerations should be given. Lilac Hills Ranch has requested so many variances, it is difficult to keep count. Some of the special requests now include the condemnation and taking of other people's property. And this for the sole benefit of a developer who is stuck because his main and only logical access has been eliminated.

When Accretive started acquiring land for this venture, I believe the county had a proposed road 3A on the map which gave some basis for some sort of development around that road because it gave direct access to Old 395, close to ramps for both north and south bound I-15. Most of the reason for road 3A was for an evacuation route for residents of Valley Center. No improvement has been made to benefit those resident's ability to escape the next wildfire and 3A was removed from the map for future planning. If we are to believe our County Officials, we live in wildfire country and it is not "if" but "when" the next one comes through. Putting new road blocks along two evacuation routes for those residents would be not only irresponsible but bordering on criminal. You need to consider the ramifications of people burning to death while trying to escape a wildfire that the County knew was coming and yet further hindered the ability of it's residents to escape. You told us that the County owns this plan. Is this really what you are trying to do. With no additional routes, you are going to add over six thousand cars a day onto existing roads that barely handle current capacity without an emergency evacuation. Please explain how you intend to safely handle the traffic flow on the existing roads and how you suggest people escape the next fire.

Also, please note that use of Mountain Ridge Road would have to involve the taking by Eminent Domain of my property and many others because this developer does not have legal rights to use that road without severely overburdening the very limited easements he possesses. I have

no intention of voluntarily selling my property for that use. Please explain how any property impacted by the Eminent Domain process, will be affected by the possibility of being reduced below the current zoning of a minimum of two acres.

It appears that much of this REIR is based on “facts” from the Dudek report and the RECON report. Since the reports were commissioned by Accretive, it is not surprising that they are biased and avoid any facts that would look bad for their client.

Dudek has blatantly left out one of the four requirements for a fire station to meet the designation of “closest fire station” because that requirement takes away the option of the fire station they want to use to meet the requirements in the General Plan. I believe you will discover, if you haven’t already, that Cal Fire wants no part of taking on that obligation. The Dudek report is extremely misleading in it’s designation of Station 15, sometimes calling it Deer Springs station 15. There is no Deer Springs station 15. This kind of false information should not be allowed to exist in the REIR. If this false information is allowed to remain in this report, it will cause decision makers to decide these important matters based on incorrect information. Anyone reading this report will assume fire protection is not an issue when it is actually a very big issue.

The RECON report is very fond of declaring the effects of construction and road grading on other people as “less than significant “. Just one example that affects me personally found on page 7, last paragraph. My house is located 45 feet from the centerline of construction. That should put grading within 20 feet of my house. But I’m not to worry because due to the magic of the laws of the right triangle, the average distance from my house to the grading activity is 150 feet therefore “less than significant”. Of course the fact that I can’t leave my house for the entire process is probably “less than significant” also. By the law of the right triangle, I guess you could throw two baseballs, one hits me in the head but the other misses by ten feet, no harm because the average was five feet away. Seriously, Is this the logic you will use to determine the actual effects on the residents who moved here for the rural uncrowded atmosphere.

Due to the lack of clarity and the confusing manner in which this report is drafted and the manner in which the findings are presented (or not presented), I appeal to the County to review this report carefully.

First, in order to put this analysis in perspective, The RECON “**Mountain Ridge Road Fire Station Alternative - Noise Analysis** dated May 16,2014 was prepared to identify and document potential noise and vibration impacts related to the existing Mountain Ridge Road community, the majority of whom live in Circle R Estates . Circle R Estates is located along a 1,200 foot section of Mountain Ridge Road which runs south from the LHR project’s southern boundary, along Megan Terrace and Adams Ct., to the top of the steep hill south of Megan (“the Circle R Community.”)

This report is mandated by law, County policy and CEQA as one of the key reports required in response to the County’s Mountain Ridge Road Fire Station Alternative. This report will be used by the County as part of the **Condemnation and Eminent Domain Process** (the “Recon Condemnation Report”). The County is proposing to take private property from 30 or more individuals to convert Mountain Ridge Road from a private road to a Public Road.

Condemnation proceedings are a very complex and tightly regulated process which requires all parties to adhere to the highest ethical standards to maintain the integrity of the process.

To convert Mountain Ridge Road from a Private Road to a Public Road is a very complex and major construction project. More than 16 excavators, graders, front end loaders and other similar construction related equipment will be required. More than ten thousand trucks loaded with fill and asphalt will be required. As noted in the report, after completion traffic will increase from 160 trips per day to more than 3,000 - an increase of greater than 2,000%.

As part of the Condemnation process, RECON was hired by Accretive, the Lilac Hills Ranch Project Developer, to:

1. Determine and quantify the significance to the Circle R Community and Mountain Ridge Road residents of the construction noise resulting from the construction of the public roadway and whether the construction noise impact complies with County Standards. The measurement used to quantify the noise impact of construction activities is dB(A). According to Recon on page 6 of the Recon Condemnation Report:
 - a. "The County has well-defined [construction noise] Noise Ordinance that covers construction noise and prohibits noise levels in excess of 75 dB(A) L [average] for an 8 hour period; and
 - b. Construction noise is **"measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received."**
2. Determine the "direct impact" to the "existing conditions" of the increased noise resulting from converting Mountain Ridge Road Private to Mountain Ridge Public Road. In this case, the existing condition for Mountain Ridge Road Private is 160 average daily trips per day and upon conversion of the road to Mountain Ridge Road Public, the traffic would be 3,410 average daily trips a day. The "direct impact" is measured by the "delta" --- or the increase in noise - between the noise generated by existing use of the road (160 average daily trips a day) compared to the proposed use of the road 3,410 average daily trips a day.

The noise measurement to determine the impact of traffic noise is CNEL (Community Noise Equivalent Level). According to the County Noise Standards - Table 2 - on page 5 of the Recon Condemnation Report, **noise from traffic is measured at the exterior areas used by the homeowner and guests as an outdoor living area such as pools, patios, outdoor sitting areas as well as gardens and landscaped areas.** In addition, the Circle R Community is a "Home Owners Association" which provides and maintains "group open space" for the exclusive use of its residents and their guests. This group open space includes private gated roads (Megan Terrace and Adams Ct.) that are for the exclusive and private use of the HOA residents and guests. **These private areas are routinely used by residents as a pedestrian walkway, especially for families with children as well as families with baby carriages.**

3. Determine the traffic "noise contours" along Mountain Ridge Road for the proposed traffic on Mountain Ridge Public to determine if they comply with County's 60 CNEL standard. Noise contours (essentially visually representations of the traffic noise) are shown in noise reports as a Figure of an aerial photograph or detailed drawing that has the noise contours shown. As an example, in the areas where noise levels are 70 CNEL, those areas are highlighted in Orange. In areas where noise levels are 65 CNEL, those areas are shown in yellow. In areas here noise levels are 60 CNEL, those levels are shown in green. Also, a noise analysis report should provide a "Traffic Noise Prediction Model" which provides a summary of the specific details of the traffic noise

calculations including the specific number of feet (such as 48 feet) to a specific noise contour (65 db)

The Recon Condemnation Report is required to be a “Stand Alone Report” for use by the County as part of the Condemnation process. The Condemnation Process requires that an EIR be prepared for use by the County before it condemns private property. That is why new reports were prepared for a variety of impacts related to the Mountain Ridge Road Fire Alternative;, including traffic (1800 plus pages); Greenhouse Gas Emissions; Air Quality and of course, noise.

The Recon Report must contain and summarize all the information that is being discussed and relied upon for the Condemnation Action. Recon may not reference tables from reports that have not been prepared specifically for the Mountain Ridge Road Fire Station Alternative, such as reports have been prepared for exceptions requests to the General Plan or Specific Plan.

The Recon Condemnation Report must contain all backup required for: determining significant impacts; **understanding what significant thresholds** are used for each impact category; **gauge potential impacts against existing physical conditions**; **provide the technical information required to support the documents findings**; **provide a clear line of reasoning in its conclusion related to impacts**, their level of significance and the **level of mitigation that would be archived by proposed mitigation measures.**

To further understand how flawed the Recon Noise Condemnation report is, it is important to have a general understanding from a “rule-of-thumb” perspective of noise and its impact.

First, the County’s Report Format and Content Requirements for Noise include a statement that a “doubling of sound energy” is considered a significant impact a “documented noise site.” A doubling of sound energy is equivalent to a 3 dB(A) increase. A document noisy site is a location with NSLU that currently exceeds 60dB(A) CNEL. This comment should have been in the Recon report but was not.

For noise generated by construction activities from a single noise source, such as an excavator, construction, the noise level will drop by 6 dB for every doubling of the distance. Thus:

1. If an excavator’s rated noise level factor is 85 dB(A) at 50 feet away from the source, at 100 feet away from the source (which is a doubling of the 50 feet) that noise level will drop by 6 dB to 79 dB and at 200 feet (a doubling again of the distance) the noise level will drop another 6 dB to 73 dB.

Inversely, for the same front end loaded rated at 85 dB at 50 feet away from the source, for every “halving” of the distance to the source, the noise level will increase 6 dB. Thus at 25 feet away from the excavator, the sound will increase by 6 dB to 91 dB - at 12.5 feet from the source the sound will increase 6 dB to 97 dB and if the excavator was located 6.25 feet from the source, it would be deafening at 97 dB.

Sound is logarithmic. To use a general rule of thumb to help understand the impact of increased or decreased sound levels a 3 dB increase in sound is considered to be just a noticeable difference. A 6 dB increase in sound is easily noticeable and a 10 dB increase in sound is Significant.

As an example, a 10 dB increase in sound would be equivalent to the difference between a washing machine and a gas powered leaf blower.

Also, sound is cumulative. At a construction site, as a general rule of thumb, for every increase in the number of pieces of equipment being used, there is a cumulative impact. If 2 excavators are operating at a construction site, the sound level will increase by 3 db. If 2 excavator's and 2 backhoe's are operating at the site (4 pieces of equipment) the sound level will increase by a total of 6dB. If eight pieces of construction equipment are operating at a construction site, the cumulative effect would be another 3 dB increase to 9dB.

Finally, the last important item about noise to understand is that it travels along the line of sight. If you can see a noise source and there is no mass (such as a wall) between you and the noise source, you will receive the full impact of that noise. Mass impedes --- or put another way- reduces noise. If there is wall between you and the noise source, it will impede the sound. However, if you are on a hill looking down onto the noise source behind a wall, there will be no impediment as you have a clear line of sight. The number of failures with this report is almost incomprehensible; so let's just start with the most significant.

The most significant failure pertains to the location of the noise receptors for modeling purposes that all of the traffic noise analysis uses for modeling. **THERE IS NO INFORMATION AS TO WHERE RECON LOCATED THEIR NOISE RECEPTORS.**

Incomprehensibly, RECON used dots on a map to show the location of their noise receptors. EACH DOT covers an area of almost 100 feet. Recon provided no explanation or documentation that would allow the public to understand their methodology. As noted above, RECON was to measure the impact to the community of traffic noise to an **exterior noise sensitive** area. Almost every home within the Circle R Community has outdoor living areas that face west, towards the sunset. The best example of the absurdly with which Recon position its noise sensors is shown on Figure 4, noise sensor R-150, my home. I have a formal patio with table and chairs on the west side of the house, less than 15 feet from Mountain Ridge Road. I have also fenced in my yard for a play area for my grandchildren that is located 12 feet from Mountain Ridge Road. Yet, Recon located the R-150 sensor on the east side of the home, behind the mass of the house ignoring the County Code for calculating noise impacts; ignoring CEQA requirements; and ignoring the defensibility and sensibility required for calculating noise impacts to a community whose property is the subject of proposed Condemnation proceedings by the County. As discussed, the integrity of the Condemnation process is of significant importance.

But, Recon further complicates a review of the locations of their exterior noise receptors by placing a "dot" that is over 100 feet wide on top of the homes where the noise receptors are located. In the case of noise receptor R-150, that means that the noise receptor could be more than 150 feet from the road even though the exterior noise areas (**what the County calls NSLU - Noise Sensitive Land Use**) at this home are less than 20 feet.

So, the next logical step is to attempt to recreate or determine where the exact placement of the noise receptors are. There is nothing in the Recon Condemnation Report that discusses the methodology used for the placement of noise receptors .

In **Attachment 1** to the Recon Condemnation Report, Recon does provide some limited details on 107 noise receptors providing X & Y coordinates. Just to be clear, that is information on 107 noise receptors, **BUT NOT ONE OF THE NOISE RECEPTORS SHOWN ON FIGURE R 4 OF THEIR REPORT FOR THE HOMES ON MOUNTAIN RIDGE ROAD IS INCLUDED. NOT ONE.**

Ok....so the next logical step is to try and understand what Attachment 1 of the Recon Condemnation Report is to see if the data can be further backtracked. But, Attachment 1 of their report is **NOT MENTIONED AT ALL IN THEIR REPORT.**

So we continue the search. We start with a review of the LHR May 13th Recon Report for the LHR project. No mention or discussion whatsoever of the locations of noise monitors located off the project site other than a similar figure to Figure 4 of the Recon Condemnation report.

We expand the search to all Recon reports within the REIR in an attempt to develop further information about the **specific location** of where off-site noise receptors are located as well as a discussion on the **methodology used for determining where to place off-site noise receptors**. **THE RESULT WAS THE INFORMATION WAS NOT TO BE FOUND** that provided any information for the off-site noise monitors other than the APN Lot Numbers.

1. The report states, "Detailed plans with proposed roadway elevation were available for this alternative" for use with modeling. Also the authors have access to aerial and satellite imagery for use in their report. Please provide a copy of the detailed plans with proposed roadway elevations that were used for this alternative.
2. Please provide a figure and conceptual plan for the construction as discussed on page 6 of the report. As stated on page 6, construction would occur along 0.6 miles of Mountain Ridge Road and **"occur over approximately 20 acres with a daily disturbance of 5 acres."** As the entire Mountain Ridge off-site 40 foot private easement is 2.8 acres, please provide details and a map showing the balance of the 20 acres that will be impacted. This is critical in being able to accurately determine the noise impact to the neighborhood. Also, as referenced in the report, work will be conducted in an "average linear working distance of 300 feet" that will impact 5 acres. For each 300 foot work section, please provide details as to the type of work noise generating work activities that will be conducted and a map showing the extent of the daily disturbance.
3. On page 7, the report states that with the "exception of the residence located 31013 Mountain Ridge Road," my residence, all physical residences are located more than 150 feet from the roadway. This is not accurate. There is a residence located on the west side of Mountain Ridge, opposite Adams Ct, that is within 50 feet of the existing road easement. Also no noise monitoring was done for this home. Please explain in detail and correct the report as required.
4. Figure 4 of the report shows a Mountain Ridge Road Buffer on 150 feet. Nowhere in the report is the Mountain Ridge Road Buffer zone defined. Please define what this buffer zone is, the significance of this buffer zone and how this buffer zone relates determining whether this project conforms to Noise standards.
5. An updated Figure 4 without the red buffer zone needs to be provided showing the CNEL noise contours. All noise contours were covered by the red buffer zone. It is impossible to determine the impact to the community without detailed noise contours. Also, as this is an existing residential community, noise contours lines must be provided in smaller increments. An increase of 3 dB in noise results in an increase of 23% in loudness perception. This Figure should be redone in increments of 3dB.
6. According to page 6 of the report, the County has well-defined Noise Ordinance that covers construction noise levels in excess of 75dB. The report also notes that is "unlawful for any person to operate or cause construction equipment to be operated" that exceeds an average sound level at the boundary line of the property where the noise source is located or on any occupied property where noise is being received. This report discusses various 150 foot zones and draws conclusions that impacts would

be less than significant. This needs to be clarified to conform to County standards. Please provide the following details:

- What are the noise levels at the boundary line of each property (by APN) for each lot on Mountain Ridge Road and any other property in direct sightline during grading as well as subsequent construction.
 - What are the noise levels at the boundary line of each property (by APN) for 12,000 or so trucks that will be required to transport fill for this project.
 - What are the noise levels at the boundary line of each noise receptor identified in Figure 4.
7. Table 2 - Noise Standards - on page 5 of the report provide a detailed description of “exterior noise levels” including the methodology for defining exterior noise levels. In conformity with Table 2, please summarize in detail and provide a figure for exterior noise for each noise receiver noted in Figure 4 as well as each exterior noise level for every residence along Mountain Ridge Road and within direct sightline. All of these homes have exterior areas (such as patios, pools, gardens, etc.) that are provided for private usable open space. Please describe in detail the noise impact to the community.
 8. Figure 4 of the report shows a number of noise receivers, such as R-120 and R-150. Nowhere in the report is the location of the receivers provided. For each of the noise receivers noted in Figure 4, please provide specific details on where the noise receivers are located and how the location of those receivers was determined to be in a noise sensitive area used by homeowners for their exterior living such as gardens, walkways, patios, fenced in play areas, etc.
 9. On page 13 of the report, the authors note that the change in noise levels along Mountain Ridge Road would change “**depending on the shielding or lack of shielding provided for the proposed grading for Mountain Ridge Road.**” Please discuss in detail all types of shielding that may be provided for Mountain Ridge Road, including a detail description of the type of shielding, which sections of the road may have shielding and the visual impacts of the shielding.
 10. Table 7 on page 13 notes the changes in cumulative operational noise level along Mountain Ridge Road between the proposed project and alternative based on average daily traffic volumes for the project and alternative as shown in Table 4. Please discuss in detail all factors that impact this calculation. Also, please discuss specifically how the proposed project noise levels for receiver 120 would be less (-4) than the alternative and receiver 150 would be less (2 dB) than the alternative despite an increase in traffic of more than 3,000 car trips a day.
 11. As the proposed alternative includes a road that will be in parts elevated more than 20 feet above the current grade, the noise levels will be increased due to the height of the road, the impact of prevailing winds, and the lack of any mass surrounding the road to dampen sound. Please discuss in detail these and any other impacts because of the road design and provide a detailed summary of all mitigation alternatives.
 12. Please provide details on the current modeled (no project) Noise Levels for all receivers shown in Figure 4.

13. Please provide details on the actual project noise levels that have been determined along any portion (off-site or on-site) of Mountain Ridge Road.

There is no way a development of this size should be allowed to impact the current residents and roads in this very rural area and further risk their lives when the next fire comes. If you own this report, I hope you think long and hard about what you are doing to the current residents and what you would be doing to anyone naive enough to buy a home with inadequate escape access.

Lilac Hills Ranch is not necessary and is contrary to any current philosophy on where to locate high density development. The access to the property has changed drastically from what they thought it was when they started, forcing drastic impact on surrounding neighbors and roads. Accretive is scrambling now to find any way to keep this project alive. Do not help them at our expense.

Respectfully,

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