

Wollam Grove Management, Inc.

P.O. Box 153, Bonsall, CA 92003

July 28, 2014

Mr. Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Subject: Lilac Hills Ranch Revised Draft Environmental Impact Report (RDEIR)

Dear Mr. Slovick,

I own a 56-acre site that borders the east property boundary of the proposed Lilac Hills Ranch development. My family and I live and operate a flower field and avocado grove on the property. Given the placement of such a large-scale residential community next to my property, and other adjacent agricultural operations, I anticipate significant land use and operational conflicts between the two uses. Regardless of the proposed mitigation measures identified in the RDEIR, the conflicts associated with the noise, dust, smoke, and pesticide use generated by the operation of my business will create long-term edge effect issues that may never be resolved. As the owner of Wollam Grove Management Inc., I appreciate the opportunity to comment on the RDEIR for Lilac Hills Ranch. I offer the following comments that should be evaluated when considering the adequacy of the RDEIR.

LAND USE

- The County's new General Plan was adopted in 2011 after 12 years of discussion, compromise, and community involvement. The resulting Land Use Element Map identified a five-plus-square-mile corridor located generally between I-15 and West Lilac Road as Semi-Rural Residential (SR-4). The proposed Lilac Hills Ranch (Project) and my property are located within the SR-4 zone. Under the existing Semi Rural land use designation, the 608-acre Project site could accommodate approximately 110 dwelling units. The Lilac Hills Ranch proposes 1,746 dwelling units. This is incompatible and in direct conflict with the existing zoning, surrounding agricultural land uses, local Community Plans, Regional Comprehensive Plans, and Regional Transportation Plans.

If it is the County Board of Supervisor's direction to see this SR-4 corridor develop in a manner similar to the Lilac Hills Ranch development, then I would recommend that my 56-acre property and the surrounding properties all be redesignated to the Village Residential (VR 2.9) land use category. This would maintain land use consistency that is practical and feasible to all property owners in the area.

- The County's General Plan sustainable development policy utilizes a two-part strategy that incorporates Smart Growth.
 - I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley).
 - II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife, among other functions.

The sustainable development works only when its two interdependent parts work together. The Lilac Hills Ranch Project undermines both aspects of this strategy. The Project introduces a "new" village into Valley Center with residential/commercial intensities far beyond anything anticipated in any local, General, or Regional Plan. Further, it forces a large development into an area with limited or no infrastructure and results in the removal of over 500 acres of active and historic agricultural land. As such, the project does not meet the General Plan sustainable development criteria and is not consistent with the County General Plan, the Valley Center and Bonsall Community Plans, or the San Diego Association of Government's (SANDAG's) Regional Plans.

- Land Use Policy 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 Leadership in Energy and Environmental Design Neighborhood Development Certification (LEED ND) 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. The Project proposes a new village, outside the area approved in the General Plan, in a location with little infrastructure, at densities higher than any other village plan, and that is incompatible with surrounding land uses and zoning. Given that the Project conflicts with all the criteria of what leapfrog development should not do, Lilac Hills Ranch truly is a leapfrog development. As such, the Project is inconsistent with the County General Plan and policies that define and support it, the County's Community Development Model, the Valley Center and Bonsall Community Plans and SANDAG's regional plans. Further, the RDEIR wrongfully surmises that by adopting amendments to the County General Plan, Valley Center and Bonsall Community Plans, and SANDAG's regional plans, that the Project will now conform to these plans and the environmental effects would be considered less than significant. Nowhere is there any discussion on the probability of these General and Community Plan amendments ever being discussed or approved. Without such assurance beforehand, this Project cannot be justifiably considered.
- As a region, with SANDAG providing coordination, we have been trying to steer growth to incorporated cities where transportation investments are occurring, and where goods, services, and employment are in abundance. The proposed project is not consistent with this effort. It contradicts growth principles that all jurisdictions have developed through SANDAG, and conflicts with the Regional Transportation Plan and Sustainable Communities Strategy (SCS).

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- The SCS is the region’s strategy for addressing GHG emissions targets for land use and transportation. The RDEIR fails to address the Project’s conflicts with the SCS strategies.
- The new County General Plan graphically depicts the locations for future growth. The intent of the Community Development Model of the General Plan is to intensify development in existing villages -- not to create new villages. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed-use core to meet the Semi-Rural designations. Twenty-five percent (25%) of the community’s future development is now planned for the “Village” area in the center of the Valley Center Planning Area, at the community’s traditional “crossroads” where road, water, and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place. The SP/GPA/RDEIR conflicts with the existing General Plan in that nowhere in any of these documents is there any justification for this extra Village and its associated list of significant impacts on lands that are planned for rural residential development and the use and preservation of agriculture. Further, there is no evidence for the conclusion that this Project is necessary for achieving any public objective.
- The RDEIR states that well over half of the homes within five miles of the Project are on lots less than two acres in size. Many of these lots are located within previously approved planned communities (Lawrence Welk) or created under a former zoning that permitted the smaller lots. The current General Plan requires a four-acre minimum lot size. The use of this example of smaller lots is not a valid rationalization to propose 10 times the residential density and 2,800-square-foot lots. This is inconsistent with the County General Plan, Valley Center and Bonsall Community Plans, the RCP, and the RTP.
- In the cumulative development section of the RDEIR, there are eight new subdivisions noted within a several-mile radius of Lilac Hills Ranch that total 157 acres. Each of these subdivisions was approved utilizing the existing 2+ acre zoning. The 157 acres yields a total of 41 lots, which is consistent with the rural character of the area, the local Community Plans, surrounding agricultural uses, and does not place a burden of the local roads, infrastructure, or native habitats. Given the size, location and density of the Project, the 608-acre Lilac Hills Ranch development is not consistent with local and regional plans nor with surrounding land uses.
- H-2.1 Development That Respects Community Character.” *Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element.*
Placing an urban project the size of Del Mar into a rural, predominantly agricultural area designated for Semi-Rural uses, is a significant degradation and detracting from the “character of surrounding development.” This Project is inconsistent with the Semi-Rural land use designations established by the General Plan and Community Plans for this area, as well as all the Guiding Principles.

LEED

- At 608 acres, the site exceeds the 320-acre maximum size for a LEED-ND project. The maximum area is based on critical factors such as providing the appropriate density of services and neighborhoods within a compact community and achieving walkability. The EIR fails to address how the project is still in compliance with the LEED-ND program when it exceeds a standard that was determined by the “core committee’s research.”
- The objectives of the LEED-ND program are clearly compatible and in alignment with the guiding principles of the County of San Diego’s General Plan and with the siting of “new green neighborhoods.” As a result, it was integrated into the Leapfrog policy of the General Plan. Any proposed deviation from LEED-ND, such as ignoring siting criteria, size restrictions, and density guidelines, should be evaluated in this context. Therefore, the Project is inconsistent with the LEED requirements and findings.
- A Specific Plan is an implementation vehicle for the Project. Approval requires compliance with CEQA; consistency as well with the network of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific Plan. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the 2011 County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan EIR. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review. Given the large number of inconsistencies with County General Plan policies and models, the Project, as proposed, cannot move forward until these issues have been resolved.
- The Project is defined as a Smart Growth development. To be considered a Smart Growth development, it must meet the Smart Growth location criteria. The SPA/GPA cannot satisfy any of the Smart Growth location requirements and, therefore, cannot be considered a Smart Growth project. The location criteria findings include:
 1. It is not an Infill Project
 2. It is not an Adjacent Site with Connectivity (does not have at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary and that is equal to or greater than 25% of the project boundary), that is adjacent to previous development.
 3. The site is not designed as a Transit Corridor or Route with Adequate Transit Service. The only mass transit is two bus routes located 4 miles north of the Project which run the circuit of the four Indian Casinos on SR- 76.
 4. None of the LEED ND significant public transit service requirements are met by the proposed circulation system. (e.g. at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a ¼-mile walk distance of bus and/or streetcar stops, or within a ½-mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals.

5. The only transit mentioned by Specific Plan and/or RDEIR is that NCTD might consider a bus stop serving part of the project. This is inadequate and must be addressed in the RDEIR or eliminated as an element of the Project.

AGRICULTURAL RESOURCES

- Based on the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the Project would have a significant impact if it proposes a school, church, day care, or other use that involves a concentration of people at certain times within *one mile of an agricultural operation* or land under Contract and as a result of the Project, land use conflicts between the agricultural operation or Contract land and the project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
- The Project proposes the placement of an elementary school 325 feet from an existing agricultural operation and a senior medical facility 2,400 feet away. The RDEIR declares the direct and indirect impacts on the proposed elementary school and senior facility as insignificant: *“Because the project design locates the school site away from the project boundary (325 feet) and state regulations prevent aerial pesticide “drift” onto neighboring properties.* The RDEIR completely ignores the one-acre Determination of Significance finding radius. Given the required significance finding, the SPA/GPA/RDEIR must address the concentration of people issue and not dismiss the impacts as insignificant. Strict application of the guideline could include the removal of these facilities from the Project.
- State pesticide regulations prohibit discharging pesticides directly onto a neighboring property, without the consent of the owner or operator of the property. There are also regulations and label requirements that prevent or minimize “drift” during aerial applications. Drift is the airborne transportation of residual pesticides, during or after pesticide application, via aerial or ground spraying, onto adjoining properties or onto roadways, trails or other routes traveled, by the general public. Figure 10 - Pesticide Application Permits depicts locations where aerial spraying of 10 or more applications per year and/or 60 or more ground spraying applications per year occur on properties that border the Project on the north, south, and east. My existing agricultural operation must continue with aerial spraying to maintain the health of my crops and cost of operations. Proposed Project mitigation measures consist of minimizing pesticide drift, a 100-foot wide fire zone buffer and a fence between the existing groves and proposed single family homes. A public hiking trail is located within the middle of the buffer area. The RDEIR then declares the impact less than significant. This buffer will never be sufficient for new property owners. The proposed mitigation measures are inadequate to properly address the real issue of health, safety, and NIMBY once the Project is built. Consideration could include expanding the buffer area to 200-300 feet and the placement of a road between the agricultural uses and the single-family homes. As noted above in the significance findings, the edge effect issues should be considered significant, particularly if the impacts could result in conversion of agricultural resources to a non-agricultural use.

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- This edge effect issue further underscores the inherent incompatibility of such a large residential project and the viability agricultural operations to continue to conduct their business. Please explain how State pesticide regulations will not hamstring agriculture uses in this region.
- The 2011 General Plan designated the area where the Project is proposed as a place for agriculture and other rural and semi-rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture as witnessed by my existing groves and flower fields. Avocado, and citrus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to sensitive individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the Project at the planned site would greatly damage many currently productive and successful agricultural businesses.
- The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern given the proximity of vulnerable public receptors such as the schools, parks, and senior center proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood.

HAZARDS, HAZARDOUS MATERIALS, WILDFIRES

- The development of a high-density project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors (schools, churches, senior centers, parks, homes). However, there is no discussion in the RDEIR which requires development in Semi-rural and Rural lands, which are adjacent to agricultural operations, to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used.
- The RDEIR fails to discuss problems that may arise from the use of public trails that border active agricultural areas, particularly during aerial spraying. The RDEIR also fails to discuss the potential impact of dust and smoke associated with the grading and planting operations, harvesting of crops, and burning of waste plant material. This is of concern, given the proximity of vulnerable public receptors such as the schools, parks, and senior housing proposed with the Project. Any reduction or changes in my current methods of operation would significantly affect my business and livelihood.
- The Project is located within a very high fire hazard severity zone (FHSZ). Locating a project of this size and scope in a very high FHSZ is not consistent with preventive land use planning. The RDEIR states that failure to meet the standard 100-foot Fuel Management Zone (FMZ) for significant portions of the Project would be a significant impact. Section 5.4

Fuel Management Zones of the FPP states “The Project includes a few areas where fuel modification zones are less than 100 feet wide. Based on a review of the RDEIR, the Project includes extensive areas where FMZs are less than 100 feet wide. This is a significant health and safety issue that must be reevaluated. Further, an expanded FMZ must be taken within the Project and not made an obligation of an adjoining property owner/agricultural use.

- The Project has not provided the FMZ that Fire Codes require.
 1. Refer to Chapter 1, Figure 1-6 Fire Protection Plan. The mitigation offered by the County is that property owners surrounding the Project provide an FMZ by managing fuel loads on their own private lands for the benefit of the Project.
 2. In most cases, the surrounding properties are used for agricultural purposes. The maintenance of off-site FMZs will reduce the number of acres in agricultural use, resulting in a financial loss for the business operator. This is not acceptable and must be reevaluated.
 3. This mitigation offered by the County is ineffective, and requires continuous and uniform maintenance by property owners outside the project that do not have a requirement to provide the Project’s FMZs.
 4. The effective mitigation is for the Project to apply a uniform FMZ to Fire Code requirements on the Project’s property exclusively. Please amend the Project’s Tentative Map and Site Plan to reflect this and remove the impact.

- The Deer Springs Fire Protection District (DSFPD) has disagreed with all four Fire Protection Service Options listed in Subchapter 2.7 Hazards. DSFPD has responded that it intends to serve the Project from the existing Station 11 at Circle R Drive and Old Highway 395.

Using Station 11 to serve the Project, response times for the furthest area of the Project is 9.5 minutes, and DSFPD has assessed “average” service at 7 minutes on the Project Availability Form. This creates a Significant Impact – Failure to meet 5-minute response time, which has not been mitigated. Counter to the County’s statements in the RDEIR, this is a Significant Unmitigated Impact until Mitigation measures are agreed to.

- The Evacuation Plan does not adequately address the central evacuation issue of the proposed Project – the ability to evacuate over 5,000 residents of the proposed Project utilizing the limited number of roads that serve the Project. Further, the Project has proposed that many of these evacuation roads be approved with substandard widths and capacity reductions. The road type, location, and configurations must be reevaluated to adequately address the safe and timely evacuation process for the Project.
 1. There are only two exits to the west from the Project. Only West Lilac and Circle R Roads provide ingress and egress to the Project. Both are two-lane 2.2F roads built to below standard conditions. The Project does not plan any lane additions or other improvements beyond upgrading West Lilac Road from the Project’s westerly entry to Old Highway 395. This limited improvement will not improve the ability for the population to safely evacuate in a wildfire evacuation scenario.

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2. There is only one exit to the East from the Project. West Lilac to Lilac Road is the only Public Road to the East. This road has horizontal and vertical curve radii that make it very marginal in an Evacuation scenario in which not only thousands of cars need to exit the area, but also first responders need ingress.
- The applicant proposes placing a large project with several vulnerable populations into a very FHSZ with substandard roadways and fuel modification zones. The Project and RDEIR must be reevaluated to provide standard FMZs throughout the Project. This issue is strained further by uncertain access to the Project site by fire apparatus. That access depends on at least two private roads, for which easement access is uncertain, and the applicant's proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency. Given the above, the Project must either be redesigned, an alternative project selected, or the project abandoned in order to address this key health and safety element.

UTILITIES

- Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements, as represented in figure 3.1-8, "Off-site Sewer Collection System." This determination is confirmed by Valley Center Municipal Water District (VCMWD). This finding makes construction of sewer and recycled water pipelines for the Project problematic. This issue must be resolved before the Project can move forward.
- There continues to be ambiguity concerning the water reclamation facility being proposed by the Applicant for Lilac Hills Ranch. The specific plan states that VCMD will direct trucking of wastewater to an off-site treatment facility for the first phase of development. (p.II-33), and that during phase one wastewater from up to 100 dwelling units may be trucked off-site on a regular basis. However, phase one consists of 350 units, which may necessitate additional trucking of wastewater over narrow twisting roads. This procedure will add numerous daily trips to and from the Project, trips that could go on for a lengthy but undetermined period. The last proposal was to construct a temporary 26,000-foot (5 miles) four-inch force main sewer line where effluent would be pumped from a temporary pumping station. While the current specific plan mentions treating the trucked effluent, it does not mention if the reclaimed water would be transported back to the Project, which would double the daily trips to and from the Project. Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.
- The proposed wastewater recycling facility (WRF) will be using hazardous materials, such as chlorine, in its treatment process. The facility is located only 686-feet from the proposed school site and only 250 feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the RDEIR conclusion that the risks from the use of toxic, hazardous materials in proximity to a school are "less than significant" is overly optimistic and must be reevaluated.

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- In the Hydrologic Assessment of the RDEIR, Figure 5 depicts over 100 wells within a one-mile radius of the Project. Groundwater studies indicate high concentration of total dissolved solids (TDS) and salt. These water quality conditions may limit groundwater application, depending on the crop and the ability to blend with other water sources. The Project proposes additional on-site settling ponds which the RDEIR purports will assist in groundwater recharge rates. The RDEIR failed to analyze the potential impacts on surrounding wells, that are used for potable and agricultural uses, as the proposed sewage settling ponds will introduce increased levels of TDS and salts into the groundwater.

TRANSPORTATION/TRAFFIC

- The SP/GPA will add over 5,000 urban residents to country roads while reducing road widths, reducing road design speeds, and ignoring other road standards established for safe, efficient transportation. A review of the Project's transportation plan indicates the Project:
 1. Fails to provide necessary services and facilities
 2. Is inconsistent with General Plan premises that the development will pay for itself;
 3. Is inconsistent with the General Plan minimum standard for Level of Service (LOS) D on County roads;
 4. Compromises the safety, comfort and quality of life of prospective residents as well as all the other residents of Valley Center who depend on these Mobility Element roads.The SP/GPA must be amended to address these issues.
- There are a number of significant deficiencies with the proposed transportation plan that must be addressed before the Project can be considered and/or move forward:
 1. The proposed Lilac Hills Ranch Project contemplates overburdening 2.2E and F two-lane, narrow winding country roads to a substandard Level of Service E and F. It also requests ten Exemptions to County Road Standards for the 1½ to 3 miles the Project needs to connect the 25,000 plus trips for this automobile-based urban sprawl project with I-15. These road configurations are not adequate to serve the proposed Project ADT and to provide safe evacuation routes. Why are exceptions being proposed for the Project?. Compliance with current road safety standards should be mandatory.
 2. The applicant does not have legal right-of-way to use Mountain Ridge Road and Covey Lane to serve the Project.
 3. The applicant does not own legal right-of-way, nor can they achieve legal right-of-way without the use of Eminent Domain, to build the proposed Covey Lane/West Lilac Road intersection in compliance with minimum County Sight Distance Line standards. How can a project be approved if the applicant has no control over the mitigation area, and cannot guarantee compliance with the proposed development standards and mitigation requirements.
- Guiding Principle 6. *Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.* The Project instead

states NCTD might be interested in a bus stop. The Project is entirely car-dependent. If approved, there are no commercial uses, no schools, and no parks until Phase 3, which is 6 to 8 years after construction of the Phase One houses. The Project does not have legal rights for the required ingress and egress to be able to construct them. If they were constructed, they would undermine connectivity by blocking emergency egress, and detract from supporting community development patterns in the central Villages, where the General Plan and Community Plans call for potential construction of roads to enhance connectivity. Additionally, off-site road improvements will not be constructed until later phases further exacerbating traffic flow and emergency evacuation. The Specific Plan must be amended to adequately address Project phasing that will accommodate the needs of the Project residents and the surrounding community.

- The intersection of West Lilac Road and Old Highway 395 is already a dangerous intersection. Project phasing within the SPA does not propose signalization of this intersection until the construction the 585th Project dwelling unit. The timing of the installation of the signal must be reevaluated to prevent a very dangerous health and safety condition.
- In the RDEIR, the County has not provided adequate disclosure regarding off-site impacts of the Project and its Alternatives to surrounding property owners. This information is necessary to demonstrate Project Feasibility and determine if the Project can ever be legally built.
- The only mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389. The closest access is at SR-76 and Old Highway 395, a minimum 4-mile trip north from the Project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido Transit Center. If you are going to a regional shopping center or work center, you must take a 30-minute bus ride to the Escondido Transit Center and transfer to another route. The mass transit system only works if you are a Casino patron and must be reevaluated as to its realistic viability.
- The Village is promoted as a walkable community. However, the school and senior care facility are the furthest from the designated town center, making the seniors travel the full two-mile length of the Project, uphill. Given this situation, most of those seniors will be driving through the project. Although trails are proposed within the Project, the viability of the system is inadequate to serve the purpose. As such, notion that this is a walkable community should be reevaluated or deleted as a Village amenity.
- The RDEIR identified eight segments of the I-15 where the Project would impose significant cumulative impacts. They include:
 - Between Riverside County Boundary and Old Highway 395.
 - Between Old Highway 395 and SR-76.
 - Between SR-76 and Old Highway 395.
 - Between Old Highway 395 and Gopher Canyon Road.
 - Between Gopher Canyon Road and Deer Springs Road.

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- ▶ Between Deer Springs Road and Centre City Parkway.
- ▶ Between Centre City Parkway and El Norte Parkway.
- ▶ Between El Norte Parkway and SR-78

Because these cumulative impacts are the responsibility of another jurisdiction (Caltrans), and no program is available to which the applicant could make a fair share contribution, no feasible mitigation measures are available to reduce the significant cumulative impacts at these three intersections. The impacts would remain significant and unavoidable. Since the impacts appear unavoidable, there is no reason that the region should suffer because of this Project. As such, this is justification to deny the Project or consider a reduced Project alternative that would not further impact the I-15.

- The RDEIR proposes a transportation plan when the commercial amenities within the Project capture many of the daily trips within the Project. The RDEIR failed to analyze the issue that the school, commercial businesses, and other amenities that would capture local traffic will not be constructed and/or in business for years to come. As such, the first several phases of development will require residents to travel local roads and freeways to Escondido or Temecula for food shopping and to Valley Center for other needs. As the required road improvements will not be constructed until later phases, the phasing of the road improvements must be reevaluated in the RDEIR to accommodate the impacts to local road and highways.
- The amount of additional traffic generated by the Project will cause 10 roadway segments, 11 intersections, and 8 highway segments to fall to an unacceptable Level of Service E and F. County transportation policies prohibit any project that causes an intersection or roadway segment to fall to LOS F. The RDEIR must be amended to include mitigation to elevate these intersections and roadways segments to an acceptable level of service.
- The Specific Plan denotes the location of two roundabouts on West Lilac Road. Their location appears to be outside of the main right-of-way, with a larger portion located within the Project area. This alignment creates additional, circular movement that would further slow traffic speed had it been aligned with the center line of the existing road. It appears the alternative location is based on the lack of public right-of-way to accommodate the circle. Please justify the alternative alignment.
- A school is proposed in the center of the Project to accommodate local children. Again, the RDEIR failed to analyze the impacts on local and regional roadways over the time period (years) until the school is built. Additionally, the RDEIR did not analyze the potential traffic impacts if the school capacity is less than a K-8 and/or if children from outside the Project would be driven each day to and from the facility.

BIOLOGY

- M-12.9 Environmental and Agricultural Resources: *“Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans.”*

The trails proposed for the Project will intrude into the FMZ buffer and Limited Building Zone (“LBZ”) areas adjacent to the designated biological open space, as well as the open space itself. The fences proposed to separate and protect both adjoining agricultural uses and segments of the open space from the edge effects created by the Project (human intrusions, domesticated cats and dogs, invasive plant species, etc.) will also create barriers to the movement of wildlife. Instead of treating the biological open space as retreats and corridors for the movement of wildlife, the trails proposed would become parks for humans and their pets. This will have an adverse effect on the value of the open space for wildlife.

- Six of the seven riparian crossings within the Project have culverts of 18- to 30-inch diameter. These culverts are too small to allow effective transit by wildlife and will impose barriers to movement or, more likely, funnel wildlife onto the road surfaces where there will be encounters with automobiles. To be effective transit elements under the roads crossing the wetlands, and to permit wildlife to avoid crossing the surface of the roads, such culverts should be a minimum of 40- to 54-inches to accommodate larger mammals. As the biology technical report notes, southern mule deer are relatively common, and three were seen on-site. Further, animals that are more nocturnal than the deer seen diurnally by Recon, such as gray fox, coyote, striped and spotted skunk, raccoon, bobcat, mountain lion, and long-tailed weasel, are more likely to use larger diameter culverts than the proposed small ones. What is the basis for proposing smaller culvert pipes? The culvert system should be reevaluated to accommodate wildlife movement between the project and adjoin parcels and with the Project itself and not just surface runoff.
- The biological report suggests that although the listed, *anticipated species*, and others not listed in the report, would be impacted by habitat loss caused by grading, construction, and human occupation, it finds that the impacts would be: *“...less than significant given the wide ranges of the species and the fact that the project does not contain a regionally significant population of these species.”*

However, since the biological report has not quantified the following, how can the report establish that the impacts are “less than significant?”

1. The existing on-site population densities;
 2. The population density thresholds that are deemed significant; or
 3. The expected on-site population densities after construction of the Project.
- The County’s biological analysis:
 1. Fails to demonstrate with data what a regionally significant population is for any of the cited species.

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2. Fails to present, or even estimate, the on-site population density of any of the cited species to allow a comparison of the site to the region.
 3. And, fails to explain how the scope of a species' range can exempt the loss of a local population.
- There is little mention of Stephens Kangaroo Rat (*Dipodomys stephensi*), a federally-listed species, in the discussion of field surveys and impacts to listed species. Given that the project site is well within the range of the species, and its presence within the County [particularly north San Diego County] is acknowledged, why were no trapping studies done to determine the extent of its presence? Given that the diurnal surveys, both directed and general, spent an average of 4.9 minutes per acre of project site, how is the County's consultant able to state that none are present?.

Thank you for your consideration of these issues. I look forward to your response.

Sincerely,

Mark Wollam

Wollam Grove Management, Inc.