

- have an elevated capacity to capture and treat the first flush runoff on the street. The rain barrels will offer additional holding capacity of the runoff from each roof top, and the captured water can be used for irrigation that will reduce the demand on imported water.
9. Under the predevelopment conditions, the project site consists of approximately 392 acres of agricultural operations with irrigated rowed crops, vineyards and orchards. According to the 2010 USEPA approved 303d list, as well as Project Clean Water, two of the main pollutants of the San Luis Rey watershed are nutrients and total dissolved solids. The main source of these principle stressors is agriculture storm runoff. Currently, there are no storm runoff treatment facilities on site to mitigate the potentially principle stressor laden runoff leaving the site. The proposed development will eliminate all but approximately 42 acres of the existing agriculture land use, effectively removing a major potential source of major pollutants that is negatively impacting the water quality of downstream watershed. The proposed on-site storm water runoff treatment control BMPs (Best Management Practices) such as the bio-retention areas on each single-family lot and adjacent to roadways, fossil filter inserts in catch basins and curb inlet as well as the detention basins will further reduce and eliminate pollutants within the storm runoff before it is discharged into downstream facilities.
 10. The Lilac Hills Ranch project will remove a major source of principle pollutants of the existing watershed. The proposed treatment BMPs will enhance the water quality of the discharge leaving the site. The proposed detention basins as well as their outlet structures will regulate the peak runoff leaving the site to be at or below that of the pre-development conditions for both the single-year peak flow as well as the hydromodification compliance events. The Lilac Hills Ranch project, overall, will improve the water quality of the watershed and provide a cleaner environment; enhancing the overall quality of life in the surrounding and downstream communities.
 11. The project is proposing an onsite waste recycling facility to serve the Project and surrounding community. Recycling will reduce the amount of waste sent to landfills and incinerators, conserve natural resources such as timber, water, and minerals; prevent pollution by reducing the need to collect raw materials; saves energy; and reduces greenhouse gas emissions that contribute to global climate change.
 12. Lilac Hills Ranch plans on using recycled water onsite for irrigation. Using recycled water for irrigation reduces the strain on the potable water system as well as decreasing wastewater discharge which prevents pollution. During the current (and reoccurring) drought cycle California is in, the use of recycled water greatly increases the sustainability of this project.

In addition to the measures above, Lilac Hills Ranch has taken extraordinary measures to avoid the manufactured slope appearance by undulating landforms to match the rolling hills that currently exist. Natural landform grading in addition to significant environmental mitigation design features will result in a community which is aesthetically compatible, sustainable and environmentally friendly. By purposefully designing slopes which mimic the surrounding natural slopes and proposing the above detailed project impact mitigation measures, the Lilac Hills Ranch project will be implementing environmental processes and aesthetic improvements that protect the County's natural resources and habitats. Lilac Hills Ranch is striving to create a low impact Master Planned community designed to support growth of the County while still protecting the surrounding natural environment.

Thank you,



Gordon Kovtun
Principal
KCM Group

LETTER

RESPONSE

	<p>C1e-57 The project accounts for the physical constraints and natural hazards of the land. With respect to grading, the overall shape of the land would remain intact as shown by the grading cross-sections included as Figure 68 in the Specific Plan. Grading in all phases, including off-site improvements, would comply with the Landform Grading Guidelines contained in the Specific Plan which will include the blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes and replicating the natural terrain. The FEIR includes conceptual grading plans showing how the grading would adhere to existing landforms and contours. (See also comment C1e-56 above.) With respect to other physical constraints and natural hazards: approximately 91 percent of the RPO 'steep slopes' are avoided and flood prone areas within the project are located in open space. The Fire Protection Plan analyzes the potential fire safety issues of the project area and includes detailed fire prevention measures that have been incorporated into the project design. In addition a 50 to 100 foot wide fuel modification zone is provided around the internal perimeter of the property and along natural open space areas as required by the Fire Protection Plan. Additional measures are included to ensure that safety is not compromised in those areas in which the 100 feet wide fuel modification zone is not met and require the approval of the Fire District. (see FEIR Figure 1-6), Ignition resistant construction provides additional safety.</p>
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community development patterns and, when appropriate, plan for development which supports public transportation. (GP p. 2-11)

The RDEIR indicates that NCTD might be interested in a bus stop. The project is isolated from existing villages and entirely car-dependent. If approved, there are no assurances that commercial amenities, schools, and parks will be built until phase 3, 6-8 years or more after building phase one houses in an area entirely removed from public transportation. The Project does not have easement rights for the required ingress and egress to the planned homes. If the homes were constructed, they would undermine rather than enhance existing connectivity by the applicant's request to downgrade a portion of West Lilac Road from a 2.2C Circulation Element road to a 2.2F Circulation Element road.

In short, by adding 5,185 residents in an automobile dependent commuter community with no access to public transit and with a degradation in road standards, the project will degrade emergency ingress and egress for fire law enforcement and evacuation in the event of fire and detract from, not support, community development patterns in the existing central Villages.

Guiding Principle 7: Maintain environmentally sustainable communities and reduce green house gas emissions that contribute to climate change. (GP p. 2-12)

The Project claims it is environmentally sustainable, but ignores fundamental requirements for sustainable building where substantial investments have already been made in urban infrastructure and amenities. Moreover, the project replaces agricultural operations and functioning rural lands that genuine "sustainable development" would preserve and protect. The characterization of the project as "sustainable" is without factual support and undermines the ability of the public and decision makers to reasonably evaluate the project and its impacts.

Guiding Principle 8: Preserve agriculture as an integral component of the region's economy, character, and open space network. (GP p. 2-13)

The Project conflicts with this principle by removing 504-acres of productive agricultural lands from use and replacing this valuable acreage with an urban city. The RDEIR relies on an inappropriate model to devalue existing productive agriculture and ignores the reality that the project site and surrounding area contain some of the most unique and valuable agriculture operations in the region.

C1e-58
cont.

C1e-59

C1e-60

C1e-58

The project is consistent with Guiding Principle 6 by enhancing the connectivity of the County's transportation network and provides a transportation system that supports public transportation. The Project's circulation network was designed to accommodate the public traveling from the adjacent public road system while maintaining the rural atmosphere and rural theme of the surrounding Community. The project will make improvements to widen West Lilac Hills Road . Although the transportation system in the unincorporated areas of the County will rely primarily on the public road network, the Specific Plan reserves a site for a future transit stop in the Town Center that could be utilized when the Community reaches a point in its development in which the NCTD system will be able to provide transit service. The project includes a Transit Demand Management Plan that ensures project linkage to the regional transit system through implementation of an interim plan and through long-term coordination with regional transportation agencies. In addition, the TDM includes an interim transit service to transport residents to the nearest transit stop until the NCTD establishes a transit route to the Project.

The comment states that the project would build roads to degraded standards, have degraded emergency ingress and egress for fire, law enforcement and evacuation in event of fire, and detract from community development patterns in the existing central Villages. The comment also states that the project does not have assurances that commercial amenities, schools, and parks will be built until phase 3, there are not easement rights for required ingress and egress to planned homes, the project's request to downgrade a portion of West Lilac Road from a 2.2.C circulation Element road to a 2.2.F Circulation element road would undermine existing connectivity.

With respect to roads being built to degraded standards. All of the exceptions being requested for the roadway improvements were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. See comment C1e-38 and C1e-39.

LETTER

RESPONSE

	<p>C1e-58 (cont.)</p> <p>The project includes a General Plan Amendment to the Mobility Element to downgrade the segment of West Lilac Road from Running Creek Road (Road 3) to Main Street from a 2.2C to a 2.2F road, addressed in subchapter 1.6 of the FEIR (See also subchapter 2.3, Traffic with respect to West Lilac Road and Road 3). An amendment to Table M-4 would also be required because the reduction of West Lilac Road from a 2.2C to a 2.2F would result in West Lilac Road operating below acceptable levels of service (in the General Plan build-out scenario). West Lilac Road is being proposed to be added to Table M-4 and exempt from LOS standards because improvements to General Plan standards of 2.2C would adversely affect active agricultural operations and mature oak woodland habitat. Additionally, the improvement of West Lilac Road to 2.2C width would require the condemnation of private land on the northern side of West Lilac Road. West Lilac Road would be improved in compliance with the County Public Road Standards, unless road exceptions are granted by the County. The section of West Lilac Road proposed to be downgraded to a 2.2F Mobility Element road will operate at LOS D or better in every scenario except with Road 3 as shown on the current Mobility Element. As noted in the TIS, Section 9.2.3, SANDAG has purchased the 902 acre Rancho Lilac property, through which Road 3 runs for biological open space. Therefore, it would be unlikely that Road 3 would be constructed in this location.</p> <p>With respect to emergency ingress and egress being degraded, the FEIR analyzed the issue of transportation hazards with respect to the road network design for the Project, and determined that impacts associated with transportation hazards would be less than significant. The overall road network design for the project would provide adequate ingress and egress for residents as well as emergency access and conform to Goal M-4. The roads within the project site were designed to accommodate emergency vehicles and allow residents to evacuate efficiently if necessary (Policy M-4.4) and the project would provide four connecting points to existing roads ensuring that both local and surrounding residents have alternate routes (Policy M-4.2). (FEIR, subchapter 2.3.3.3.) The Evacuation Plan examined the existing and the Project's planned roads and determined that it would provide adequate multi-directional primary and secondary emergency evacuation routes.</p>
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LETTER

RESPONSE

	<p>C1e-58 (cont.)</p> <p>With respect to detracting from community development patterns in the existing central Villages, see response to comments C1e-8, c1e-11 and c1e-12.</p> <p>The comment is correct in that the commercial amenities, schools and parks will be built with phase 3. However, even though the project phasing provides flexibility, the project requires the implementation of each of the mitigation measures identified in the FEIR by either phase, building permit issuance or other applicable measurement that will ensure construction and provision of services commensurate with development impacts. (For instances, Table 2.3-24 and Table 2.3-25 provide a mitigation summary for the direct and cumulative impacts, respectively, for the project as related to traffic by EDUs.) Therefore the project will be required to build the infrastructure needed to serve the project when the project requires such facility, such as in the case of the public parks. The project will dedicate a public park (P10) to the County and provide the amenities in accordance with the County's Park Lands Dedication Ordinance. An interim park will be provided after a period of time has lapsed as described in the Specific Plan. With respect to schools, the project will be required to pay the appropriate fees at building permit issuance. If any impacts cannot be mitigated by the construction of the needed infrastructure, the FEIR has fully informed the decision maker of such fact for their consideration.</p> <p>With respect to the commercial center, the commenter is correct in that there is no requirement that all phases of the project will be constructed at a certain point in the project or that the town center be operational within a specific period of time. Please refer to comment C1c-173.</p> <p>With respect to the comment that there are not easement rights for required ingress and egress to planned homes, please refer to Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and the Off-site Improvements - Environmental Analysis and Easement Summary Table regarding rights-of-way included in these response to comments.</p> <p>C1e-59</p> <p>The comment states that the project does not provide any support that the project meets the requirements of sustainable development. The underlying premise of the General Plan is to conserve natural resources and develop lands and infrastructure more sustainably in</p>
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LETTER

RESPONSE

	<p>C1e-59 (cont.) the future. (General Plan, p.1-16) The General Plan identifies such goals and policies that contribute to achieving this premise as listed in Table I-1.</p> <p>The FEIR analyzes whether the project meets all of the relevant policies listed in Table I-1, including the “sustainable development” linchpin principles of LU-1.2 and the Community Development Model, as described throughout each of the appropriate subchapters of the FEIR and in Appendix W to the FEIR. See also response to comment C1e-48 above. With respect to GHG, please refer to response to comments O9-60.</p> <p>C1e-60 The comment states that the project conflicts with the Guiding Principle 8 by removing 504 acres of productive agricultural lands from use, uses an inappropriate model to devalue existing productive agriculture and ignores reality that the project site and surrounding area contain some of the most unique and valuable agriculture operations in the region.</p> <p>The project does not conflict with Guiding Principle 8. The site is currently located in an area of agricultural and rural residential uses. The project incorporates mitigation measures and project design features to assure the protection of agricultural operations. Specifically, on-site prime and statewide importance soils that would be converted to non-agricultural uses would be mitigated through the purchase of agricultural conservation easements at a 1:1 ratio. Additionally, 42.2 acres of agricultural buffers and agricultural open space are included as part of the project design, and ongoing agricultural cultivation would be allowed to continue in these areas. As discussed in subchapter 3.2.3 of the FEIR, the project would include on-site biological open space, common open space, LBZ buffers, as well as Mitigation Measures M-AG-2, M-AG-3, and M-AG-4, which would ensure that urban/agriculture compatibility conflicts are less than significant.</p> <p>Please see Appendix W for response to Policy 7.1, which discusses protection of agricultural lands with lower density land use designations that support continued agricultural operations.</p>
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LETTER

RESPONSE

<p>Guiding Principle 9: Minimize public costs of infrastructure and services and correlate their timing with new development. (GP p. 2-14)</p> <p>The SP and implementation plan are inconsistent with this principle and are geared to increase public infrastructure costs while minimizing the applicant's infrastructure costs, in an area currently devoid of infrastructure.</p> <p>Guiding Principle 10: Recognize community stakeholder interests while striving for consensus. (GP p. 2-14)</p> <p>This applicant has had only very minimal contact with the Valley Center community and the Valley Center Community Planning Group throughout the planning process. No changes or attempts to reach consensus were ever made in response to community comments and concerns.</p> <p>The project is inconsistent with and fails to fulfill the foregoing guiding principle.</p> <p><u>V. COUNTY PLANNING STAFF IDENTIFIED 121 GP POLICY CONFLICTS IN THE SCOPING LETTER. THESE CONFLICTS ARE NOT ANALYZED IN THE RDEIR OR THE SPECIFIC PLAN</u></p> <p>On June 13, 2012, County staff issued a "Project Issue Checklist" listing (on 350+pages) more than 1000 project "issues" regarding the project and its planning documents. The list included Major Project Issues (with GP Policies) as well as GP and CP Policies that posed potential conflicts.</p> <p>The staff directive to the applicant at that time was, "<i>Please immediately review the policies and indicate to the staff how you would propose to revise these policies or if you disagree with staff's analysis. If policy revisions are required to the County's General Plan, then the project's EIR must also analyze the impacts to the County's General Plan.</i>" In subsequent edition, the Checklist refers the reader to other documents – in some instances to a GPAR (General Plan Amendment Report), in others to the Land Use Section of the RDEIR. However, a review of these resources shows there is no policy-by-policy discussion of consistency. This level of analysis must be provided.</p> <p>The June 13, 2012 version of the Project Checklist is among the submissions to the administrative record made in August 2013. The RDEIR should discuss in detail each of these GP and CP consistency issues.</p>	<p>C1e-61 The comment states that project will increase public infrastructure costs while minimizing the applicant's infrastructure costs.</p> <p>The project would be responsible for funding the construction/ improvement of public facilities including wastewater, recycled water, and imported water infrastructure, which would be sized to serve the project's population. Infrastructure improvements will follow the phasing plan outlined in the Lilac Hills Ranch Specific Plan. In addition, the applicant would be required to meet various commitments prior to approval of each Tentative Map such as providing landscaping, street improvements, parks, open space dedications, and satisfying the mitigation measures included in the FEIR. This will ensure that adequate infrastructure is available to each phase of development at the appropriate time as required to implement the project.</p> <p>The project would be responsible for the construction/improvement of roadways and provision/extension of public facilities, which would be sized to serve the project. Please refer to subchapter 2.3 of the FEIR for the analysis the project's impacts to roads, intersections and Caltrans' facilities based on the Traffic Impact Study, attached as Appendix E to the FEIR. The project includes numerous improvements to area roadways both as design features and required as mitigation measures. Specifically, as detailed in subchapter 1.2.1.4, the project includes the construction of a number of off-site roadway improvements to several roadway segments in the project's vicinity. These improvements include the widening, repaving, and restriping of portions of the following existing roadways:</p> <ul style="list-style-type: none"> • West Lilac Road • Covey Lane • Rodriguez Road • Mountain Ridge Road
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	<p>C1e-61 (cont.)</p> <p>Additionally, the project includes the following intersection improvements:</p> <ul style="list-style-type: none"> • Installation of traffic lights at the following intersections: Gopher Canyon Road and I-15 ramps; Highway 395 and Circle R Drive; Highway 395 and West Lilac Road, Highway 395 and East Dulin Road, and Miller Road and Valley Center Road. • Dedicated right-turn lanes at the westbound Gopher Canyon Road approach and the northbound East Vista Way approach to East Vista Way/Gopher Canyon Road intersection. • Intermittent turn lanes at major access locations along Lilac Road from Old Castle Road to Anthony Road including the segment between Robles Lane and Cumbres Road, and the intersection of Sierra Rojo Road and Lilac Road. <p>There are two significant and unavoidable impacts to County roadways. The remaining significant and unavoidable impacts are to Caltrans facilities. Significant impacts to County roads the segment of Pankey Road between Pala Mesa Drive and SR-76 (identified in the FEIR as Impact TR-16), the segment of Gopher Canyon Road between E. Vista Way to Little Gopher Canyon Road (identified in the FEIR as Impact TR-12) . Mitigation for these road segments is determined infeasible, as discussed in Section 6.4 of Appendix E of the FEIR, because the cost required improvement is not roughly proportional to the impact of the project. Mitigation measures must be roughly proportional to the environmental impacts caused by the project. These significant and unmitigable impacts are fully disclosed in the FEIR for consideration by the decision maker. In addition, the segment of Pankey Road is currently required to be improved to the Mobility Element Road Classification of 2.1A as a condition of the previously approved Campus Park and Meadowood projects. While the General Plan has a desired LOS standard for a Mobility Element road, the General Plan does not prohibit projects from having significant and unmitigable impacts on County Roadways.</p> <p>See also the discussion in the FEIR regarding the transportation system network, sewer and schools at subchapters 2.3, 3.1.7, and 3.1.5 respectively and Appendix W regarding General Plan Policy conformance.</p>
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LETTER

RESPONSE

	<p>C1e-62 The project was forwarded to the group for review throughout the process. In addition, public meetings and informational meetings were held by the County for community residents to provide information about the project.</p> <p>C1e-63 The statement references a Project Issue Checklist that was sent by the Planning and Development Services Department to the Applicant that raised numerous issues regarding the project and its planning documents. These issues have been addressed as a part of the process through review of technical studies, revisions to the project, and the General Plan Consistency Matrix, Appendix W, that was provided. It is standard for a project to have major project issues that need to be addressed throughout the process. Please note that the letter predates the public review period of the prior draft of the project's EIR and the FEIR. CEQA requires that comments on a draft EIR should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the project's significant effects might be avoided or mitigated, especially specific alternatives or mitigation measures. (Guidelines 15204(a).) Since the attached letters were written before the FEIR was out for public review, the letter goes beyond the scope of CEQA and does not raise any environmental issue with respect to this document.</p>
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CHAPTER 3: ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT 19

VI. THE LIMITED CONSISTENCY ANALYSIS THAT DOES APPEAR IN THE RDEIR IS INCOMPLETE AND INSUFFICIENT

The RDEIR (in Section 3.1.4.1, pp.3-78–3-86) lists what it calls the “relevant policy and regulatory framework” for the project. But this list is not the detailed analysis that CEQA requires; instead, under the rubric of “Existing Conditions” this section is mainly a summary of applicable planning documents.

RDEIR Section 3.1.4.2 (p.3-86) is titled “Analysis of Project Impacts and Determination of Significance.” In the subsection entitled “Impact Analysis” specifics are either missing or inadequate, and replaced with brief descriptions of the project followed by unsupported assertions. Select examples follow:

1. The RDEIR fails to identify the array of GP policies that would have to change in order to approve the proposed SP/GPA. Instead, the RDEIR merely asserts the unsupported conclusion that *“The proposed project includes a General Plan Amendment, which if approved, would result in the project being consistent with the General Plan.”*
2. In the RDEIR there is a brief recitation of LEED ND characteristics and an airy claim that the Project meets the principles and standards for LEED ND certification [although it points out that it is not necessary to actually be certified – and it definitely couldn’t be with the present site location]. However, there is no analysis of the site location and linkage requirements of LEED ND, simply a claim that the Project meets the criteria. The RDEIR goes on to address “Smart Location” as required by the County’s General Plan by citing its relationship to services and the I-15 corridor. It fails to address the LEED ND requirement for site selection that prohibits agricultural locations and instead urges in-fill sites within existing urban areas or adjacent to developed areas. LEED ND also requires appropriate linkage to existing nearby employment, shopping, commercial, and transit facilities, none of which is adequately analyzed in the RDEIR.
3. The GP Community Development Model continues to be presented as if it is no more than an arrangement of densities rather than a reflection of a whole complex of interdependent ideas about sustainable development. Nevertheless, the RDEIR asserts, without any substantiation, *“the proposed project would be consistent with the Community Development Model of the County General Plan and designed to meet the LEED Neighborhood Development Certification of an equivalent.”*
4. In the few cases where specific GP policies are cited, the evidence for consistency with the policy is in some cases asserted by merely repeating the language of the policy itself. For LU-1.2: *“the project is not “leap frog development” because it is designed to conform to the*

C1e-64

C1e-65

C1e-66

C1e-67

C1e-68

C1e-64

Please refer to General Plan Consistency Matrix, attached to the Specific Plan as Appendix W. Also see Global Response: General Plan Amendment CEQA Impacts Analysis for a thorough analysis of this issue.

C1e-65

The project does not propose to amend any guiding principles, goals, objectives or policies of the San Diego County General Plan. The project’s consistency with the existing General Plan was analyzed and it was concluded that no such amendments to goals or policies to the San Diego County General Plan was needed. Please refer to General Plan Consistency Matrix (Appendix W) and comment C1e-3.

C1e-66

Please refer to Global Response: Project Consistency with General Plan Policy for LU-1.2 for a thorough analysis of this issue.

C1e-67

Please refer to Global Response: Project Consistency with General Plan Policy for LU-1.2 for a thorough analysis of this issue.

C1e-68

Please refer to Global Responses: General Plan Amendment CEQA Impacts Analysis and Appendix W and response to comment C1e-3 above.

<p><i>Community Development Model, provides necessary services and facilities, and would be designed to meet the LEED Neighborhood Development Certification or an equivalent." For LU-3.1, LU-3.2, and LU-3.3: "The project likewise provides 'a complete neighborhood' to include a neighborhood center within easy walking distance of surrounding residences (LU-3.3) while providing a mixture of residential land use designations and development regulations that accommodate various building types and styles (LU-3.1 and LU-3.2)."</i></p> <p>5. In a few cases where the SP/GPA proposes amendments to Mobility Element road classifications or acceptable LOS, the RDEIR asserts that the SP/GPA is not inconsistent with GP because relaxing the standards makes it consistent. Again, the tail is wagging the dog and consistency is achieved only by amending the General Plan to fit the project. Specifically, under RDEIR section 3.1.4.2 (4), "Other Relevant General Plan Policies" (RDEIR p. 3-91-3-92) the claim is made that by merely listing a number of road segments surrounding the Project on Mobility Element Table M-4 [which identifies road segments with road classifications that could result in LOS E/F but do not merit extra lanes because of the adverse impacts of adding them] that the burden of the added 20,000 ADT from the Project is put aside.</p> <p>6. The RDEIR (Section 3.1.4.2, "Other Relevant General Plan Policies," p. 3-92) asserts, incorrectly, that, "A discussion of the project's conformance with other General Plan policies is detailed in the General Plan Consistency Analysis (see Appendix W). Overall, the project would be consistent with the General Plan; therefore, land use impacts associated with policy inconsistencies would be less than significant."</p> <p>7. In its 'evaluation' of Growth Inducement (RDEIR 1.8.3, Construction/Improvement of Roadways, p. 1-46 -1-47) The RDEIR suggests, "Therefore, the project's proposed on-site circulation plan and off-site road improvements would not result in the removal of a barrier to additional growth in the area." These road improvements provide the type of improvements that CEQA acknowledges remove barriers to growth, not merely satisfying the Project's growth. Additionally, the statement in RDEIR (1.8.4.2, New Schools, p.1-48) the County suggests that the addition of a new school would be, "...growth accommodating, and not growth inducing." The County fails to discuss the presently vacant school in the North Village of Valley Center [adjacent to the elementary school] and the lack of interest by both the Bonsall Unified School District and the Valley Center Pauma Unified School District in a new school on the Project site. Left to either school district to decide, students in the Project would have to be driven or bussed to school off-site. The County's analysis of the 'new school' is inadequate. It is gratifying to note the improved stance of the County on growth inducement relative to this Project. Where, in the earlier version of the DEIR the County took the position that the Project</p>		<p>C1e-69 The project includes a change to the Mobility Element classification of West Lilac Road (between Main Street and Road 3) from 2.2C to 2.2F. This change would reduce required right-of-way and shoulder width. The project would include improvements to 2.2F standards subject to an exception request (#5) that would allow construction of a modified half-width 2.2F Light Collector improvement widening the existing 24 feet of pavement to 26 feet.</p> <p>An amendment to Table M-4 would also be required because the reduction of West Lilac Road from a 2.2C to a 2.2F would result in West Lilac Road operating below acceptable levels of service in the General Plan build-out scenario. As described under Goal M-2, there are instances where the County considers it more appropriate to retain a road classification that could result in a LOS E / F rather than increase the number of travel lanes where the County has determined that the adverse impacts of adding travel lanes do not justify the resulting benefit of increased traffic capacity. These instances are based on criteria established under Policy M-2.1.</p> <p>West Lilac Road is being proposed to be added to Table M-4 and exempt from LOS standards because improvements to General Plan standards of 2.2C would adversely affect active agricultural operations and mature oak woodland habitat. Additionally, the improvement of West Lilac Road to 2.2C width would require the condemnation of private land on the northern side of West Lilac Road. West Lilac Road would be improved in compliance with the County Public Road Standards, unless road exceptions are granted by the County. The section of West Lilac Road proposed to be downgraded to a 2.2F Mobility Element road will operate at LOS D or better in every scenario except with Road 3 as shown on the current Mobility Element. As noted in the TIS, Section 9.2.3, SANDAG has purchased the 902 acre Rancho Lilac property, through which Road 3 runs for biological open space. Therefore, it would be unlikely that Road 3 would be constructed in this location.</p>
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LETTER

RESPONSE

	<p>C1e-69 (cont.)</p> <p>Also, exceptions have been requested as part of the Project approvals including a segment of West Lilac Road along the project frontage would avoid significant grading of steep slopes and disruption of existing driveways. Alternative options for improvements to West Lilac Road along the project frontage including (A) follow the existing pavement and build to classification 2.2F unmodified, (B) follow the existing pavement and build to classification 2.2C, and (C) follow the SC-270 alignment and build to classification 2.2C. With any of these options, the road would function adequately with implementation of the project improvements.</p> <p>The FEIR does not identify significant and unmitigated impacts to any segments of West Lilac Road. The project will be required to improve West Lilac Road to accommodate anticipated traffic. While frontage improvements would be required at approval of the first Final map, off-site improvements would be required prior to recordation of the Final Map associated with the 929th EDU of the Lilac Hills Ranch Specific Plan. West Lilac Road Improvements between Old Highway 395 and Main Street would be required to meet the General Plan Mobility Element classification of 2.2F or 2.2C, subject to exceptions as approved by the County. Refer to subchapter 2.3 and Appendix E of the FEIR for details on the analysis of impacts and proposed improvements along West Lilac Road. The analysis shows that project impacts to West Lilac Road would be fully mitigated to below a level of significance.</p> <p>C1e-70</p> <p>The comment states that the discussion of the General Plan conformance in the FEIR is incorrect but does not identify any specific concerns or issues. Please refer to Global Response: General Plan Amendment CEQA Impacts Analysis and Appendix W.</p> <p>C1e-71</p> <p>Subchapter 1.8.3 of the FEIR determined that the project’s proposed on-site circulation plan and off-site road improvements would not result in the removal of a barrier to additional growth in the area. The road improvements associated with the project are designed to provide adequate primary and secondary access to serve the project and would not add any additional capacity to facilitate additional growth or remove a barrier to growth in the area around the project site.</p>
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LETTER

RESPONSE

	<p>C1e-72 The comment states that the statement in FEIR that the addition of a new school is growth accommodating does not take into consideration the presently vacant school in the North Village of Valley Center and the lack of interest by both the Bonsall Unified School District and the Valley Center Pauma Unified School District in a new school on the project site.</p> <p>The commenter questions the adequacy of the analysis of growth inducing impacts for its failure to deem as growth inducing the provision of a school. Subchapter 1.8 was revised but still concludes the project's dedication of a school site and the construction of a school by the district would be growth accommodating and not growth inducing. As detailed in subchapter 3.1.5.2 of the FEIR, pursuant to state law, SB 50 fees are paid as mitigation for a project's impact to school facilities. These fees, collected school district help fund the acquisition of sites and construction of new school facilities. Therefore the provision of a K-8 school by a district or private entity in the future would be in response to and facilitated by development and student generation within the district. Therefore the project's dedication of a school site and the potential for the construction of a school by a district is growth accommodating.</p> <p>As stated in the October 30, 2014 letter to Mark Slovick, the Bonsall Unified School District is interested in the project's school site for a possible location to operate a new school. See also, response to comment C1g-61. As the proposed on-site K-8 school is intended to serve the Lilac Hills Ranch project, the traffic impacts associated with the school use are accounted for in the projects Traffic Impact Study (FEIR Appendix E). A majority of the traffic generated by the school would be internal trips which would not leave the project site. As the school would serve the community, extensive use of buses on surrounding roadways is not anticipated</p>
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	<p>C1e-73 Regarding growth inducement, the FEIR at subchapter 1.8 analyzes various factors, including project density, additional housing, roadway construction, public facilities, fire and emergency services, schools, and water and wastewater services, and concludes the project could be growth inducing due to the intensification of uses on-site, lower fire response times to the vicinity, and expansion of water and sewer infrastructure. The project would make improvements to existing off-site roads, but would not add additional travel lanes or construct new roads to serve undeveloped areas. Road improvements would be made to the degree needed to support direct and anticipated cumulative traffic. Therefore the project's proposed on-site circulation plan and off-site improvements would not result in the removal of a barrier to additional growth.</p>
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was located in a site that, while not zoned for growth, could accommodate it and that none of the typical obstacles to growth such as a lack of services and infrastructure were present on the Project site. The County is now more realistic in its assessment in some of those areas and is citing growth inducement from General Plan Amendments to density, extension of fire service and expansion of water and sewer infrastructure. It still needs to rethink road improvements.

8. The RDEIR should also discuss and analyze the growth inducing impact and precedential effect of approving this project's notion that the Community Development Model is simply a "Village" puzzle piece that any developer can drop anywhere in San Diego County's rural countryside.

9. There is no General Plan Amendment Report (GPAR). Historically, a GPAR present the details of a GPA and discusses its consistency, or lack of consistency, with all GP elements, but this Specific Plan text does NOT include a General Plan Amendment Report even though the SP at page 1-12 states that, "Section V of this Specific Plan text and Chapter 4 of the General Plan Amendment Report and Appendix A provides detailed analysis regarding how and why this Specific Plan is consistent with the goals and policies of the County General Plan." There is neither a GPAR nor an Appendix A dealing with the Specific Plan and General Plan! [Appendix A is a 1000 scale vicinity map]. This is a fundamental problem requiring a rewrite and reissuance of the RDEIR. This same problem was cited for the DEIR of August 2013 and has not been addressed.

VII. ADDITIONAL APPLICABLE GENERAL PLAN GOALS AND POLICIES NOT DISCUSSED OR ANALYZED IN THE RDEIR INCLUDE:

A. Land Use Element

LU-1.4 Village Expansion: "Permit new Village Regional Category designated land uses **only where contiguous** with an existing or planned Village and where all the following criteria are met:

- Public facilities and services can support the expansion without a reduction of services to other County residents
- The expansion is consistent with community character, the scale, and the orderly and **contiguous** growth of a Village area." (Emphasis added)

Comment – INCONSISTENT: If there was an existing or planned Village in western Valley Center, Accretive could try to use this provision, instead of being prohibited by the Leapfrog Development provisions of LU-1.2. However, the only "existing or planned Village" in Valley Center is the Village in the central valley where north and south nodes are separated by a dramatic escarpment and Moosa and Keyes Creeks. This area has existed

C1e-73
cont.

C1e-74

C1e-75

C1e-76

C1e-74 The project proposes a project-specific General Plan Amendment (GP 12-001). Specifically, GP 12-001 proposes to: 1) amend the regional Land Use Element map to change the existing Semi-Rural Regional Category to a Village Regional Category, 2) amend the Valley Center Community Plan Map to change the existing land use designation from Semi-Rural SR-4 to Village Residential and Village Core (and revise the community plan text to include the project as a third village), 3) amend the Bonsall Community Plan to change the existing land use designation from Semi-Rural to Village Residential land uses, (and revise the community plan text to include the project), and 4) amend the Mobility Element to downgrade the segment of West Lilac Road from Running Creek Road (road 3) to Main Street from a 2.2C to a 2.2F road, addressed in subchapter 1.6 of the FEIR (See also subchapter 2.3 with respect to West Lilac Road and Road 3) allowing West Lilac Road to operate below acceptable levels of service in the General Plan build-out condition.

The comment mischaracterizes the analysis in the FEIR with respect to the project's consistency with the General Plan. General Plan Policy LU-1.1 provides that land use designations on the Land Use Map are to be assigned in accordance with the Community Development Model and boundaries established by the Regional Categories Map. This does not prevent future amendments to the Regional Land Use Map; rather the Regional Categories Map and the Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. The Land Use Maps must be interpreted in conjunction with the language of the General Plan's Goals and Policies which expressly provide authority to make future amendments as may be determined appropriate by the County Board of Supervisors. (County of San Diego General Plan, adopted August 3, 2011, page 3-18, which page is incorporated herein by this reference.)

General Plan Policy LU-1.2 provides a degree of flexibility to the General Plan to accommodate new villages. The Community Development Model is a planning model adopted by the County to be used in part to assign future land use designations on the County's Land Use Map. Therefore, when LU-1.1 is viewed in the context of all of the General Plan's goals and policies, future amendments to the Land Use Map and Regional Categories Map are allowed.

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	<p>C1e-74 (cont.)</p> <p>The project is amending the General Plan by adding a new Village that meets the criteria of Policy LU-1.2. With respect to the project's consistency with LU-1.2, please refer to Global Response: Project Consistency with General Plan Policy LU-1.2. The General Plan Amendment will not amend General Plan principles, goals, objectives or policies. The only textual changes would be to the Bonsall and Valley Center Community plans. The project's consistency with the existing General Plan was analyzed and it was concluded that no such amendment to the San Diego County General Plan was needed. Please refer to FEIR Appendix W and comment C1e-3.</p> <p>C1e-75</p> <p>This comment is based upon the previous draft EIR circulated in 2013. In addition, there is no requirement to prepare a General Plan Amendment Report. However, a General Plan Consistency Matrix was prepared and attached as Appendix W to the FEIR. Please also refer to Global Response: General Plan Amendment CEQA Impacts Analysis and comment C1e-3 and C1e-74.</p> <p>C1e-76</p> <p>The commenter's assertion that a new village is not authorized "if Policy LU1.4 is to be given effect" would lead to the conclusion that the County would be prohibited from amending its General Plan in the future to allow for the establishment of any new villages other than what has already been designated by the current General Plan Land Use Map. Policy LU-1.4 specifically addresses the "expansion" of existing or planned villages under very specific circumstances. LU-1.4 permits new Village Regional Category Designations contiguous to existing or planned villages. It does not address the provision of new villages designed to be consistent with the community development model in areas where none currently exist. That condition is addressed in LU-1.2 which was adopted to ensure that new villages would be allowed.</p> <p>While the General Plan does state that villages are intended to grow in compact land development patterns, the General Plan also recognizes the need to accommodate future growth. (Page 2-7) The General Plan states that it is intended to be a dynamic document and provides that amendments will be reviewed to ensure that the change is in the public interest and would not be detrimental to public, health, safety, and welfare. (County of San Diego General Plan, adopted August 3, 2011, Page 1-15) There are numerous</p>
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<p>as a "Village," has been planned for expansion for more than 50 years and was designated a SANDAG Smart Growth Opportunity area with the recent update of the County General Plan. The area has sewers and has received a large grant from the state of California to expand wastewater facilities. Valley Center Road, which traverses this area and connects to Escondido and Pauma Valley, was improved to Major Road standards only a few years ago in anticipation of expanded development here. The Valley Center Community Planning Group has increased residential densities in this area so that about 25% of the community's growth can be accommodated in the "vibrant, compact Villages" the community has envisioned.</p> <p>This provision is a clear companion and complement to the other GP goals and policies designed to intensify development in existing Village areas and avoid leapfrog development by permitting new Village uses only where contiguous with an existing Village. The Project cannot satisfy this foundational requirement and fails to meet the additional criteria: Its construction would clearly reduce services to all Valley Center residents outside the development by taking away from the economic viability of the existing two Villages, as well as blocking emergency evacuation ability for current residents. Its urban pattern is totally out of 'character and scale' with Valley Center's vision. A new Regional Category Village is simply not authorized if this Land Use policy is to be given effect according to its plain meaning.</p> <p>LU-2.3 Development Densities and Lot Sizes: "Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community." Comment – INCONSISTENT: This is another example of the interrelated and internally consistent fabric of the GP. Densities and lot sizes reflect community character. Valley Center's community character is primarily rural, exemplifying the Community Development Model at the heart of the GP. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.</p> <p>LU-2.4 Relationship of Land Uses to Community Character: "Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in Addition to the General Plan Guiding Principles." Comment – INCONSISTENT: Requiring projects to comply with the applicable Community Plan is the most effective way to meet the GP Goal LU-2, to maintain the county's rural character. Valley Center's community character is primarily rural, exemplifying the Community Development Model at the heart of the GP. This Project is inconsistent with the Semi-</p>		<p>C1e-76 (cont.)</p> <p>policies in the General Plan that contemplate that future growth will occur and provide direction with respect to its future planning, such as M-2.1 (require development projects to provide road improvements), M-3.1 (require development to dedicate right-of-way), S-3.1 (Require development to be located to provide adequate defensibility) and COS-2.2 (Requiring development to be sited in least biologically sensitive areas).</p> <p>With respect to the comments regarding reducing services and taking away from economic viability refer to comments C1e-51-53. and blocking emergency evacuation, refer to comments C1e-24 and C1e-58.</p> <p>C1e-77</p> <p>The Lilac Hills Ranch Project is a new village whose structure, design and function are based on the Community Development Model. The Project proposes a "Village" Regional Category, surrounded by Semi-Rural Regional Category land uses that transitions to Rural Regional Category. This gradation of land use densities is illustrated at the Project level in the Specific Plan at Figure 8, entitled, "Proposed Community Plan Land Use Designations." Please see FEIR Appendix "W" and refer to the Specific Plan, (Section V, Chapter 3 – Land Use Element), for further details on the project's relationship with community character.</p> <p>Compliance with the project's design guidelines and other provisions of the Specific Plan assures the project's compatibility with the adjacent off-site land uses and within the project. Overall, the project is consistent with the relevant policies of both the Bonsall Community and Valley Center Community Plans and land use impacts associated with policy inconsistencies would be less than significant.</p> <p>The community character of both the Valley Center and Bonsall is acknowledged as rural communities with relevant goals within each community plan addressing interest in preserving the rural character of the planning areas. Specifically, Goal 1 of the VCCP Community Character Goals is to preserve and enhance the rural character of Valley Center. The project proposes a compact village that is consistent with the Community Development Model by transitioning higher intensity uses in the Town Center, to lesser intensity uses away from the core, with agricultural buffers along the edges to transition to adjacent semi-rural land uses. The Design Guidelines</p>
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C1e-76
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C1e-77

C1e-78

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	<p>C1e-77 (cont.)</p> <p>and other provisions of the Specific Plan assure that monotony in design is avoided by requiring a variation in lot sizes, orientation, dimensions, architectural scale and character. The proposed project further assures consistency with relevant policies associated with this goal through the requirement for Site Plan review by the Valley Center Design Review Board. Additionally, BCP Policy LU-1.1.1 requires development in the community to preserve the rural qualities of the area. Conformance to this policy is reflected through the varied land uses proposed within the project site including different patterned homes, the maintenance of on-site agriculture within biological buffers and common areas, and small village commercial centers. Additionally, the project places the highest density of homes closest to the center of the site, furthest from adjacent agricultural operations. Developing the village in this manner would provide housing needs in a compact village design that is consistent with the Community Development Model.</p> <p>Finally, as detailed in the Agricultural Resources Report (see Appendix F of the FEIR), one of the project's objectives includes the recognition of the existing rural atmosphere of the surrounding area through use of agriculture on-site and provision of transitional features to provide adequate buffering between types of residences and active agriculture. The Specific Plan includes agriculture throughout the project site , biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the boundaries of the project site, as agricultural compatibilities buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may also be established by the project as allowed in the C-36 zones. Project grading would conform to the natural contours of the land and would not substantially alter the profile of the site as shown by the grading cross-sections included as Figure 68 in the Specific Plan. Please also refer to Appendix W.</p> <p>C1e-78 See response to comment C1e-77 above.</p>
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Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles.

LU-5.3 Rural Land Preservation: *“Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.”*

Comment – INCONSISTENT: The proposed Project fails to ensure the preservation of this rural area. The proposed project destroys open space, agricultural lands, wildlife habitat and corridors, and watersheds with its urbanized design, density and size. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.

LU-6.1 Environmental Sustainability: *“Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.”*

Comment – INCONSISTENT: There have been thirteen (13) Group 1 animal species of concern observed on the Accretive project site. (RDEIR Subchapter 2.5.1.3). They include lizards, snakes, raptors, small mammals, large mammals and passerine birds. Most of the wildlife surveys conducted focused on the proposed open space areas, functionally ignoring the environmental value for foraging and habitat of the considerable land area devoted to agriculture. Of the 608-acres on the Project site, 504-acres will be graded, cut and filled, for the construction of the Project.

The RDEIR acknowledges the impacts to these 13 species [and presumably to other species numerous enough not to be of concern], and particularly the significant impacts to the foraging habitat of the raptor and cathartid species [white-tailed kites, Cooper’s hawk, turkey vulture] due to the loss of 504-acres of foraging area [including agricultural areas]. (RD EIR Subchapter 2.5, p.18-34). The RDEIR dismisses this loss with 81.7-acres of on- and off-site mitigation area (DEIR Subchapter 2.5-38) [presumably already populated by members of these species with whom the impacted Project species will have to compete] and a substantial differential from the entire 608-acres actually impacted by the Project. Many of the individuals of the 13 species will be killed during the construction operations, particularly the smaller, less mobile animals. Those surviving the construction impacts will be forced into new territory.

The Project is not consistent with this policy and fails to require the protection of sensitive natural resources with the exception of riparian wetlands. Such practices of building urban density projects in rural and even agricultural areas will ultimately decimate the natural environment.

C1e-78 cont.

C1e-79

C1e-80

C1e-79 The project is consistent with the intent of LU-5.3. With respect to consistency of the project with project density and sizes, Policy 5.3 is not applicable to the project because the policy is concerned with “permitting development under the Rural and Semi-Rural Land Use Designations.” The project is requesting a General Plan Amendment approval of which would result in a change in Land Use Designation from Semi-Rural to Village. Please refer to response to comment C1c-136 regarding consistency of project density and lot sizes with the community character. Please refer to FEIR, Appendix W, for a discussion of project consistency with General Plan Land Use policies.

C1e-80 The project is consistent with LU-6.4 in that the project has been planned to conserve open space and natural resources, protect agricultural operations. With respect to the project being planned to increase fire safety and defensibility, all proposed on-site roads, as well as Mountain Ridge Road from the project’s southern boundary to Circle R Drive, have been designed in accordance to the County Consolidated Fire Code and DSFPD standards and would exceed the driveway minimum horizontal radius, fall within the 20 percent maximum allowable grade and meet or exceed the minimum paved width requirements. Specifics of the proposed roadway designs compared to the Consolidated Fire Code are detailed in the Road Standard Comparison Matrix., Appendix P of the Fire Protection Plan (FPP). In addition, a regional evacuation plan was developed by the Deer Springs Fires Safe Council and approved by CALFIRE and the DSFPD. This community emergency evacuation plan is a significant component of the Project’s Evacuation Plan. (FEIR Appendix K Section V.) The Evacuation Plan determined that the location of the project, which is proximate to the approved regional evacuation plan’s major evacuation routes, and the existing and planned roads in the area provide adequate multi-directional primary and secondary emergency evacuation routes. (FEIR Appendix K, Evacuation Plan, Section III.) All of these roads will be improved and developed to at least the standards consistent with the County Consolidated Fire Code. (Evacuation Plan, Section III; see the Road Standard Comparison Matrix., Appendix P of the FPP, and pp. 33-38 of the FPP; see also FEIR, subchapter 2.7.2.4.) A Wildland Fire Behavior Assessment or fire model was included in the FPP to provide four worst-case scenarios for wildland fires. As a result of the findings of the fire modeling, project design features were incorporated into the

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<p>LU-6.4 Sustainable Subdivision Design: <i>“Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]”</i></p> <p>Comment – INCONSISTENT: The Accretive Project instead proposes the minimum required open space, eliminates existing and imperils adjacent agricultural operations, and substantially worsens fire safety and defensibility, as shown by the Deer Springs Fire District comments. Instead of reducing impervious footprints, it proposes 1746 residential units and commercial development, covering 504 of its 608-acres. Trumpeting “sustainable” development practices, it completely ignores the fundamental requirements of LEED ND to have a Smart Location and preserve Agriculture. The public amenities necessary to support this proposed city in the country, such as parks, schools and sewers, are all couched in “conceptual” terms, with built-in defaults to convert more acres to residences. If, for example, the school or park sites (proposed without school and park amenities or facilities) are not accepted, the SP provides for their easy conversion to residential uses.</p> <p>LU-6.6 Integration of Natural Features Into Project Design: <i>“Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.”</i></p> <p>Comment – INCONSISTENT: Over four million cubic yards of grading destroys natural features and creates “manufactured” hills suitable only for urbanized residential construction. Native vegetation habitats will be destroyed and mitigated off-site. Animal populations will be destroyed or shoved to the remaining riparian set-asides or off-site. Avoidance of sensitive environmental resources is minimal. Destruction of this area’s natural features and mitigation elsewhere are the preferred approaches for this Project and are inconsistent with this policy and Valley Center planning objectives.</p> <p>Lu-6.7 Open Space Network: <i>“Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.”</i></p> <p>Comment – INCONSISTENT: This Project has reserved minimal open space along wetlands and riparian areas that are protected by federal, state, and county laws. The continuity of the open space will be broken by multiple road crossings with culverts mostly inadequately sized for safe wildlife passage. Intensely urban development will dominate the presently rural agricultural and natural vistas with rows of dense urban rooftops. The open spaces being set aside are not coordinated with the draft Multiple Species</p>	<p>C1e-80 (cont.) Project, including fuel modification zones, use of ignition resistant building materials, fire and building code requirements, provision of secondary emergency access roads and adequate water supply for fire hydrants. The FEIR found that with the adoption of Mitigation Measure M-HZ-1, impacts to wildland fires would be reduced to less than significant. (FEIR, subchapter 2.7.2.4, and FPP pp 17-21.) Subchapter 2.7.3.4 of the FEIR also identified the project’s contribution to a potential cumulative impact would be less than cumulatively considerable with respect to wildland fire hazards based on the FPP, associated landscaping plans and implementation of mitigation measures related to FMZs.</p> <p>C1e-81 The project is consistent with LU-6.4. Please refer to response to comment C1e-60. See also Appendix W to the FEIR. As discussed in FEIR subchapter 2.4, the project requires the implementation of mitigation measures to ensure both the safety of on-site residents from adjacent agricultural operations, as well preserve the integrity of those off-site operations from on-site land uses. Development in accordance with the Fire Protection Plan will ensure safety for residents. Please also refer to the Global Response: Fire and Medical Services. In addition, the project is designed in accordance with LU-1.2, which addresses sustainable development practices, including impervious footprints, location, and agriculture. Please see Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>C1e-82 The comment is incorrect that the project lacks assurances that amenities, such as parks would be built. In the case of the public park, the project will dedicate a public park (P10) to the County and provide the amenities in accordance with the County’s Park Lands Dedication Ordinance. An interim park will be provided after a period of time has lapsed as described in the Specific Plan. The project will be required to build infrastructure to serve the project when such facility is needed, such as sewer facilities. The project requires the implementation of each of the mitigation measures identified in the FEIR by either phase, building permit issuance or other applicable measurement that will ensure construction and provision of services commensurate with development impacts. However, with respect to schools, the project will be required to pay the appropriate fees at building permit issuance. As detailed in subchapter 3.1.5.2 of the FEIR, pursuant to state law, SB 50 fees are paid as mitigation for a</p>
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	<p>C1e-81 (cont.) project's impact to school facilities. These fees, collected school district help fund the acquisition of sites and construction of new school facilities.</p> <p>C1e-82 The project is consistent with LU-6.6. The most recognizable and sensitive natural feature on the property are the drainages with their mature oak woodlands. As discussed in FEIR subchapter 2.5, these features will be preserved within permanent open space easements. See also Appendix W to the FEIR.</p> <p>C1e-83 The project is consistent with LU-6.7. The project is not located within any planned or proposed regional preserve system. The project will preserve the sensitive wetlands on-site while focusing development in less sensitive upland areas where there are no significant populations of native species. The open space areas are contiguous and protect wildlife. The proposed open space would allow wildlife movement as the area is adjacent to and drains into the proposed preserve envisioned in the Draft North County Multiple Species Conservation Program (NC MSCP). Animal movement is discussed in detail in FEIR subchapter 2.5. Specifically, FEIR subchapter 2.5.2.4 finds that while the project would reduce existing blocks of native vegetation, the local wildlife corridors identified on-site are not recognized as important regional linkages in the draft North County MSCP. Nonetheless, no barriers would be created that would isolate portions of the riparian habitat within the local wildlife movement corridors from breeding or foraging habitat, or prevent access to water sources necessary for reproduction. There are no regional wildlife corridors or core areas identified on the project site. The culverts would function as wildlife corridors and be sufficient to allow small terrestrial animals to avoid roads, while the larger terrestrial animals would not use the smaller culverts. Avian movement through the site would be minimally affected, as birds would be able to continue to use the riparian woodlands by flying along the habitat corridor and over road crossings. As discussed in response C1d-89, the Biology Report, based on a site assessment, adequately disclosed that there is a moderate potential for mountain lion to utilize the project site due primarily to availability of prey species on the site. There are no scenic vistas within the open space. Trails are proposed throughout the project site connecting multiple park and recreational areas, as well as other proposed uses throughout the community.</p>
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Conservation Program/Pre-approved Mitigation Area ("MSCP/PAMA") and will not connect with any similar open space uses off-site. While the Project is within the draft MSCP boundary it is not a part of a PAMA.

C1e-83
Cont.

LU-6.9 Development Conformance with Topography: "Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent possible."

Comment – INCONSISTENT: The destruction of natural features proposed by this Project's over four million cubic yards of grading is clearly inconsistent with this policy. The Project does not limit grading in a manner consistent with this policy. The Project proposes to significantly alter the dominant physical characteristics of the site.

C1e-84

LU-9.6 Town Center Uses: "Locate commercial, office, civic, and higher-density residential land uses in the Town Center of Villages or Rural Villages at transportation nodes..."

Comment – INCONSISTENT: As previously pointed out in the comments on the Project's failure to meet the LEED ND Smart Location Requirement, the Project is not designed as a Transit Corridor or Route with Adequate Transit Service. It is not a "transportation node."

C1e-85

LU-9.11 Integration of Natural Features into Villages: "Require the protection and integration of natural features, such as unique topography or streambeds, into Village projects."

Comment – INCONSISTENT: This provision was included in the GP because Valley Center required the developers of the north Village to do exactly that, making the streambed there an open space centerpiece of their design in their cooperative plans for their adjacent projects. Accretive instead proposes to obliterate the natural beauty for their entire project site, grading over four million cubic yards of "natural features" into faux hills.

C1e-86

LU-10.2 Development-Environmental Resource Relationship: "Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas."

Comment – INCONSISTENT: This Project does not respect nor significantly conserve the unique natural flora and fauna of the site, nor does it conserve the rural character of the site. This Project will destroy a mosaic of natural vegetation habitats that are interspersed among agricultural uses. The current mix of natural habitats, orchards and row crops provides distinctive opportunities for a variety of faunal species [several of them sensitive], benefits the local hydrology by restraining and filtering run-off, and presents a pastoral view-shed that is historically characteristic of north San Diego County. The Project will create severe

C1e-87

C1e-84 Lilac Hills Ranch is designed so that 99.7 percent of all grading will occur outside of the RPO steep slope areas. The objective of the Project is to provide an environmentally sensitive, residential community compatible with the character of the surrounding area and preserving the existing natural open space, landforms, and topography.

The project is consistent with LU-6.9 in that grading in all phases, including off-site improvements would comply with the Landform Grading Guidelines contained in the Specific Plan, which will include the blending and rounding of slopes, roadways, and pads to reflect the existing surrounding contours by undulating slopes, replicating the natural terrain. Runoff is directed to existing drainages through appropriate mechanisms as discussed in the FEIR, Chapter 3.0 and in Appendix U-1, 2, 3 relating to hydrology and storm water management to the maximum extent practicable. See also comment C1e-56 and C1c-144.

Based on the Preliminary Grading Plan each of the project phases would involve grading of 50,000 tons per day of material, with the total movement of material, including aggregate rock, to be 4 million tons. Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of grading per home, which would require a minor grading permit on an individual lot basis.

C1e-85 A transportation node is defined as either a point to access a transportation network or a point through which it is possible to change transport mode such as from a car to a bus. The project is consistent with LU-9.6 in that the Town Center is located at the main intersection of Main Street and Lilac Hills Ranch Road in the north-central portion of the property and would be considered a transportation node because it would be easily accessible to public transportation and is where a transit stop could be included in the future when the NCTD bus service is extended to this area. Neighborhood Centers are also located with other civic and commercial uses to enhance viability and ensure that they can be easily reached on foot or bike. With respect to the comment regarding the Project's failure to meet the LEED-ND Smart Location Requirement Please refer to Global Responses: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.

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	<p>C1e-86 The project is consistent with LU-9.11. Please refer to response to comment C1e-56 and C1e-82.</p> <p>C1e-87 The project is consistent with LU-10.2 by conserving unique natural features and avoiding sensitive environmental resources. The Project design incorporates the preservation of 104.1 acres of open space, the on-site creation of 6.0 acres of wetland habitat for wildlife use, and the enhancement of 12 acres of existing disturbed riparian habitat to native riparian habitat for wildlife use. See FEIR, subchapter 2.5 and Biological Resources Report, Section 8.0 and Table 10. The biological open space being preserved on the project site conserves the local important wildlife corridors. See Figures 14a and 14b of the FEIR, subchapter 2.5 and Biology Resource Report. Mitigation measures will protect raptor foraging habitat, will restore, enhance, and maintain open space subject to a reviewed Resource Management Plan, funded through an endowment or community facilities district, will enhance and create wetlands, under the jurisdiction of local, state, and federal resource agencies, and will include a Revegetation Plan, with numeric success criteria, and subject to local, state, and federal review and approval prior to issuance of wetland and the first and all subsequent grading permits. The project also respects the rural character of the surrounding agricultural lands. FEIR shows impacts on agriculture will be mitigated by the preservation of off-site agricultural land. The project incorporates mitigation measures and project design features to assure the protection of agricultural operations. Specifically, on-site prime and statewide importance soils that would be converted to non-agricultural uses would be mitigated through the purchase of agricultural conservation easements at a 1:1 ratio. Additionally, 42.2 acres of agricultural buffers and agricultural open space are included as part of the project design, and ongoing agricultural cultivation would be allowed to continue in these areas. (Subchapter 2.4.6 of the FEIR)</p>
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<p>hydrology issues with the addition of hundreds of acres of impermeable road and rooftop surfaces that will cause excessive run-off. Run-off, that would otherwise enter the water table and help to stabilize levels vital to the riparian habitats down-slope, will be impounded and/or dispersed on the surface.</p> <p>The Project will be composed of dense urban village configurations that are completely at odds with rural and semi-rural areas and the natural habitats and populations they support.</p> <p>B. Mobility Element</p> <p>M-12.9 Environmental and Agricultural Resources: <i>“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.”</i></p> <p>Comment – INCONSISTENT: Presently, the trails proposed for the Project will intrude into the 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 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 affect on the value of the open space for wildlife.</p> <p>C. Conservation and Open Space Element</p> <p>Goal COS-2 Sustainability of the Natural Environment: <i>“Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.”</i></p> <p>Comment – INCONSISTENT: The Project will eliminate 504-acres of mixed native and agricultural lands that provide foraging area for numerous animal species identified in the biological resources report. This represents an incremental loss of habitat and ultimately a loss of local wildlife populations within the County and the Project site. The removal of the project site from the inventory of rural lands to create an urban village will constitute an irreversible loss and opposes the intent of sustainable development. It will result in growth inducing pressure on surrounding properties as the rural and natural characteristics of the land disappear.</p> <p>COS-2.1 Protection, Restoration and Enhancement: <i>“Protect and enhance natural wildlife habitat outside of preserves as development occurs”</i></p>		<p>C1e-88 The project is consistent with M-12.9. Project trails would be located adjacent to open space areas using existing dirt roads to minimize the need for clearing of natural vegetation although improvements may still be required. Please refer to the Specific Plan and FEIR Figure 1-8 for more details on trail locations. Fencing will be used along back yards to separate the developed areas from the open space. This will block pets from entering the open space and keep wildlife from entering back yards. Fencing will also be used at trail entry points to guide users onto the trails. See also FEIR subchapter 2.5 for further discussion of wildlife movement and project effects on biological resources.</p> <p>C1e-89 The project is consistent with COS-2. In keeping with the project objectives of a consolidated development footprint, the project preserves the on-site sensitive wetland habitat while developing less sensitive upland areas where no significant populations of native species are located. As detailed in the FEIR subchapter 2.5, mitigation measures are required to assure the conservation of upland habitat in off-site areas to compensate for the loss of resources on-site. The amount of required mitigation is consistent with County and Wildlife Agency ratios. Preserving this land off-site, in areas of greater sensitivity, allows the County to fulfill the goals of the draft North County MSCP. The areas identified for off-site preservation (NC MSCP PAMA) will ensure that the natural environment is preserved in an interconnected preserve system.</p> <p>See also subchapter 1.8 of the FEIR regarding Growth Inducing Impacts. The project could have the potential to result in adverse physical environmental effects due to growth inducement but the potential impacts are too speculative for evaluation in this FEIR because the specific nature, design and timing of future projects is unknown at this time. See also Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>C1e-90 The project is consistent with COS-2.1. Please refer to response to comment C1e-89. As discussed in FEIR subchapter 2.5, the project is consistent with the Draft NC MSCP. The project will not impact the plan because it is located entirely outside of the PAMA.</p>
	C1e-87 Cont.	
	C1e-88	
	C1e-89	
	C1e-90	

according to the underlying land use designation. Limit the degradation of regionally important Natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.”

Comment – INCONSISTENT: This Project proposes to set a devastating precedent for the intrusion of urban development into rural lands. While the Project site is within the MSCP boundary, it is not a part of PAMA. The site is presently designated for estate housing and agricultural uses but would be modified to allow urban village densities, which would diminish rural and natural lands within the MSCP area and likely induce similar densities on surrounding properties. Such creeping higher densities within the MSCP would ultimately impact the neighboring PAMA areas through edge effects and compromise the value of those native habitats and the intent of the MSCP/PAMA program.

C1e-90
cont.

COS-2.2 Habitat Protection through Site Design: “Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.”

Comment- INCONSISTENT: Like GP Goal COS-2.2, the prerequisite of the LEED ND standard also is to place development in smart growth locations, such as urban infill and brown fields or adjacent to urban areas where there is easy access to infrastructure and job centers. This Project fails to meet those goals and, consequently, it will cause significant destruction of biological assets in an area that should be spared under the criteria for a smart growth location.

C1e-91

C1e-91

The project is consistent with COS-2.2. Please refer to response to comments C1e-89 and C1e-90. As shown on FEIR Figure 1-9, the on-site sensitive wetland habitats are preserved and could connect offsite to a planned regional preserve system. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

COS-3.1 Wetland Protection: “Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.”

Comment – INCONSISTENT: The Project is preserving and restoring the on-site wetlands, habitats that are in shortest supply regionally, but the upland components will be subjected to severe grading, and fuel modification to accommodate the development. Rather than retaining any opportunity for preservation or enhancement, the upland areas will be deprived of any continuing value for both flora and fauna.

C1e-92

C1e-92

The project is consistent with COS-3.1. The project will conserve approximately 90% of onsite wetlands and restore degraded habitat in accordance with the Resource Protection Ordinance. The wetlands will be maintained through compliance with regulatory requirements of the National Pollutant Discharge Elimination System. Impacts to upland habitat will be mitigated based on mitigation ratios designed to provide adequate preservation of each habitat type within the unincorporated County and to comply with the federal Endangered Species Act, state Endangered Species Act, and state Natural Communities Conservation Planning Act As discussed in FEIR subchapter 2.5, mitigation for impacts to upland natural communities will be achieved through the purchase and conservation of off-site habitat within future PAMA lands. The preservation of this habitat in off-site mitigation areas allows the County to build the MSCP preserve.

COS-3.2 Minimize Impacts of Development: “ Require development projects to:

- Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and
- Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydro-modification, land and vegetation clearing, and the introduction of invasive species.”

Comment – INCONSISTENT: The Project proposes to mitigate the loss of wetlands caused by new road crossings by restoring or creating wetlands on-site adjacent to existing wetlands. The value of mitigating

C1e-93

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<p>wetland losses on-site is questionable given the edge effects caused by human intrusion, domestic cats and dogs, invasive plant species, trash, etc. that cause mitigation efforts to be diminished. The trails plan exacerbates these edge effects by establishing trails within and adjacent to the biological open spaces.</p> <p>Further, the Project's storm water run-off from the construction of hundreds of acres of impermeable surfaces will impact the water regime within the biological open spaces. Adding too much or, conversely, removing too much water from the water table can have adverse effects on the survivability of the riparian habitat.</p> <p>D. Housing Element</p> <p>H-1.9 Affordable Housing Through General Plan Amendments: <i>"Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project when this is legally permissible."</i> Comment – INCONSISTENT: There appears to be NO discussion anywhere in the RDEIR or SP regarding Affordable Housing or Goal H-1 and Policy h-1.9 except the briefest of mentions in the SP regarding the responsibility of developers of large scale projects to provide an affordable housing component per state law and county ordinance and that it would be a part of the mixed use segment in the town center. There is NO discussion of the extent of the affordable housing component or any of the parameters surrounding it. The RDEIR should more explicitly discuss this component and provide an analysis of it in the context of the entire Project.</p> <p>H-2.1 Development That Respects Community Character. <i>"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. [See applicable community plan for possible relevant policies.]"</i> Comment – INCONSISTENT: Requiring projects "not to degrade or detract from the character of surrounding development consistent with the Land Use Element" explicitly ties housing back to the bedrock Land Use Element, the Community Development Model, and the LEED ND Smart Location Requirement. 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 detraction from the "character of surrounding development." This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles.</p> <p><u>VIII. VALLEY CENTER COMMUNITY PLAN (VCCP) INCONSISTENCIES</u></p>	<p>C1e-93 and C1e-94</p> <p>The project is consistent with COS-3.2. Please refer to response to comment C1e-92. As discussed in FEIR subchapter 2.5, the project is consistent with the California Natural Community Conservation Planning Act of 1991 (NCCP), and County's Resource Protection Ordinance (RPO). The project is also consistent Watershed Protection Ordinance (WPO). Through consistency with these regulatory plans, the project demonstrates its consistency with COS 3.2. As detailed in the FEIR subchapter 2.5.2.5, the project is consistent with all relevant policies, ordinances, and conservation plans related to protection and mitigation of wetlands. The coastal sage scrub habitat on-site and off-site does not support any sensitive species. The loss of coastal sage scrub habitat due to project impacts would not isolate the remaining habitats from other natural resources or habitats required for the preparation of a subregional NCCP plan as the project site is not in a high biological habitat value core area.</p> <p>The project would have impacts to RPO wetlands. An analysis of the required findings to allow crossings of RPO wetlands was prepared for the on-site crossing impact locations (see Appendix G). This analysis concludes that the proposed crossings meet the findings necessary to allow the impacts through impact avoidance and minimization by placing the proposed crossings where RPO wetlands are narrow, disturbed, and at existing roads. All impacts to RPO wetlands will be mitigated per County requirements.</p> <p>The project site is not located in a Biological Resource Core Area, is not a substantial habitat linkage, and does not include narrow endemic species. The proposed mitigation, including sensitive habitat mitigation ratios as shown in FEIR Table 2.5-1, would be in compliance with the BMO.</p> <p>As detailed in the FEIR subchapter 3.1.2, the project is consistent with the WPO to assure that proposed on-site hydromodification changes will not impact storm water run-off. A Major SWMP has been developed for the project to identify a preliminary list of BMPs, which would be implemented as project design features, to minimize disturbance, protect slopes, reduce erosion, and limit or prevent various pollutants from entering surface water runoff.</p>
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	<p>C1e-93 and C1e-94 (cont.) The project would implement features such as rain barrels on each single family home, onsite detention basins with grass-lined bottoms, bio-retention areas within the roadways, and permeable pavers within some of the onsite streets which captures and stores excess runoff within the void spaces of the base material. With these methods employed throughout the project both on the individual lot and project wide basis, the overall project will become hydrologically invisible such that there are no additional impacts to downstream drainage facilities, both man-made and natural open space. (See Sections II and III of the Specific Plan for further discussion of hydromodification design).</p> <p>C1e-95 The commenter questions the consistency of the project with Housing Element Policy H-1.9 regarding affordable housing. The County does not have an ordinance requiring developers to provide affordable housing. Please refer to FEIR, Appendix W, for a thorough discussion of consistency with project-applicable Housing Element policies.</p> <p>C1e-96 This project complies with this policy by being consistent with the Land Use Element as explained throughout the FEIR and Appendix "W" and the design of the project would not degrade or detract from the existing homes in the area through the application of the Specific Plan Design and Architectural Guidelines. Please see response to comment C1e-77 regarding Community Character and Global Response: General Plan Amendment CEQA Impacts Analysis and Appendix W. See also comment C1e-10 regarding the Community Development Model.</p>
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	<p>C1e-97 The commenter is correct in that the project, is proposing to amend the General Plan Regional Land Use Map to remove the existing regional category and land use designation and to re-designate the entire 608-acre site as 'Village' would be required. The project also proposes a General Plan Amendment to change the Valley Center and Bonsall Community Plan land use designations to Village Residential (VR 2.9) and Village Core (C-5). The project's Specific Plan would include agriculture as an allowed use within much of the project site including common open space areas and manufactured slopes. HOA-maintained agricultural open space would be permitted, including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may be established by the project within the C34 zoned areas and would include such uses as farmers markets and wineries. The project would support and complement the rural lifestyle in Valley Center via the Specific Plan, which supports the continuation of on-site agriculture throughout the project site including common open space areas and biological open space. Overall, the project would include trails, equestrian opportunities, retained agriculture, preserve sensitive habitat and define neighborhood with architecturally appealing concepts.</p> <p>As discussed in subchapter 3.2.3 of the FEIR, the project would include on-site biological open space, common open space, LBZ buffers, as well as Mitigation Measures M-AG-2, M-AG-3, and M-AG-4, which would ensure that urban/agriculture compatibility conflicts are less than significant. The project incorporates mitigation measures and project design features to assure the protection of agricultural operations. Specifically, on-site prime and statewide importance soils that would be converted to non-agricultural uses would be mitigated through the purchase of agricultural conservation easements at a 1:1 ratio. Additionally, 42.2 acres of agricultural buffers and agricultural open space are included as part of the project design, and ongoing agricultural cultivation would be allowed to continue in these areas.</p> <p>The FEIR adequately analyzes the potential effects the Project would have on nearby agricultural land and the potential for the project to make agriculture less viable from a financial and practical perspective. Subchapter 2.4.3.3 of the FEIR states, "The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming</p>
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A. Community Character Goals

Preserve and enhance the rural character of Valley Center by "maintaining a pattern of land use consistent with the following regional categories: A. **Village.** Enhance the rural village character of Valley Center's north and south villages... B. **Semi-Rural Lands:** Preserve and maintain the overall rural and agricultural character of the semi-rural areas..."

Policy 1. "Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.

Policy 2. Maintain the existing rural character of Valley Center in future developments by prohibiting monotonous tract developments. Require Site design that is consistent with rural community character. (VCCP p. 4)

Comment – The RDEIR and SP cannot avoid the clear inconsistency with these provisions by the fiction of merely adopting a new Map showing three Villages instead of two. Placing an urbanized area the size of Del Mar in the middle of an active agricultural area will destroy the rural character of the project site, indeed all of the Planning Area. Destruction of a designated Semi-Rural cannot be interpreted as "preservation." The RDEIR must, but does not, explain and analyze the environmental effects of this patent inconsistency.

B. Land Use Goals

"Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses are contained. "A pattern of development that conserves Valley Center's natural beauty and resources, and retains Valley Center's rural character..."
 "Development that maintains Valley Center's rural Character through appropriate location and suitable site design." (VCCP p.8)

Comment – The SP and RDEIR cannot avoid the clear inconsistency with these provisions which recognize only the two existing Villages, do not contemplate additional villages and are consistent with both the GP and VCCP, the Community Development Model, and the Smart Location requirements of LEED ND. The RDEIR must, but does not, explain and analyze the Project's inconsistency with these provisions or environmental effects of these inconsistencies.

C. Village Boundaries Map (VCCP p. 9)

Comment – The SP and RDEIR cannot avoid the clear violation of the existing Map, which shows the two existing villages, not three villages. Merely adopting a new Map showing three villages instead of two fails to address the other resulting conflicts with the numerous identified GP and VCCP provisions. The RDEIR must, but does not, explain and analyze the environmental effects of these multiple inconsistencies.

C1e-97
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C1e-98

C1e-99

C1e-97 (cont.)

infeasible or, at least, heighten the attractiveness of selling other farms for development." The analysis concludes that a potentially significant impact would occur due to the potential incompatibility, but concludes impacts would be fully mitigated by proposed mitigation measures. Please see Global Response: Agricultural Resources, Indirect Impacts for information responsive to this comment.

Community character is discussed throughout FEIR subchapter 3.1.4. The community character of both Valley Center and Bonsall is acknowledged as rural communities with relevant goals within each community plan addressing interest in preserving the rural character of the planning areas. Specifically, Goal 1 of the VCCP Community Character Goals is to preserve and enhance the rural character of Valley Center. The project proposes many different densities and architectural styles, integrated into a cohesive community through landscaping, trails, and a Town Center to provide community focus. The Design Guidelines and other provisions of the Specific Plan assure that monotony in design is avoided. The proposed project further assures consistency with relevant policies associated with this goal through the requirement for Site Plan review by the Valley Center Design Review Board.

Please see Appendix W for response to Policy 7.1, which discusses protection of agricultural lands with lower density land use designations that support continued agricultural operations.

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	<p>C1e-98 The project is consistent with the Land Use Goals contained in the VCCP. The project proposes to amend the Community Plan by adding a third Village. This goal in the Valley Center community plan text will be revised to indicate that there are three Villages in the community plan. Proposed changes to the community plan text were available for public review on the County's website.</p> <p>The County's Community Development Model does not dictate the number of Villages that may be developed. Rather, it guides new village development into more compact development as a means to reduce associated impacts. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.</p> <p>C1e-99 The project proposes to amend the Regional Land Use Element Map of the General Plan to change the existing Semi-Rural Regional Category to a Village Regional Category; amend the Valley Center Community Plan Map to change the existing land use designation from Semi-Rural SR-4 to Village Residential and Village Core (and revise the community plan text to include the project as a third village); amend the Bonsall Community Plan to change the existing land use designation from Semi-Rural to Village Residential land uses, (and revise the community plan text to include the project); and amend the Mobility Element to downgrade the segment of West Lilac Road from Running Creek Road to Main Street from a 2.2C to a 2.2F road.</p>
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	<p>C1e-99 (cont.)</p> <p>General Plan Policy LU-1.1 provides that land use designations on the Land Use Map are to be assigned in accordance with the Community Development Model and boundaries established by the Regional Categories Map. This does not prevent future amendments to the Regional Land Use Map; rather the Regional Categories Map and the Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. The Land Use Maps must be interpreted in conjunction with the language of the General Plan's Goals and Policies which expressly provide authority to make future amendments as may be determined appropriate by the County Board of Supervisors. (County of San Diego General Plan, adopted August 3, 2011, pages 1-15 and 3-18, which page is incorporated herein by this reference.)</p> <p>General Plan Policy LU-1.2 provides a degree of flexibility to the General Plan to accommodate additional population increases as necessary in a manner that meets the requirements of the Sustainable Communities Strategy of the General Plan (consistent with Assembly Bill 32) (General Plan, pp 2-7 through 2-9.) The Community Development Model is a planning model adopted by the County to be used in part to assign future land use designations on the County's Land Use Map. Therefore, when LU-1.1 is viewed in the context of the General Plan's goals and policies, it is clear that future amendments to the Land Use Map and Regional Categories Map are allowed. The project is a new Village whose structure, design and function are based on the Community Development Model. (FEIR, subchapter 3.1.4.2, Land Use Planning; Technical Appendix W, Att. A, pp. 1-2; Specific Plan, Part II.G, pp. II-38-40); the Project is located within existing water and sewer boundaries (SDCWA boundaries) as contemplated by the General Plan (FEIR, subchapter 1.8.4, and the Specific Plan, Part I.E.2; Water Resources, p. 1-7); and, the project is designed to be LEED-ND equivalent (Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this related topic.)</p>
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	<p>C1e-99 (cont.)</p> <p>The FEIR frames the General Plan consistency analysis at subchapter 1.4 under “Environmental Setting,” and describes its current land use planning context (current general plan land uses and both community plans). (FEIR, subchapter 1.4.) Subchapter 1.6 describes the General Plan amendment required for approval of the project and is analyzed by the FEIR. Also, every chapter of the FEIR contains a discussion of the project’s consistency with the existing General Plan and whether any physical environmental impacts may result. The land use consistency analysis for the proposed project is presented in the FEIR subchapter 3.1.4 and in Appendix W. The FEIR does conclude that land use impacts would be less than significant in that the project would be consistent with the General Plan. The FEIR clearly and thoroughly analyzes the potential physical environmental impacts that could result from project approval and the amendment of the Regional Land Use Element Map to change the regional land use category from Semi-Rural to Village. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.</p>
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<p>D. Rural Compatibility Policies (VCCP p. 11)</p> <p>4. "Require new residential development to adhere to site design standards which are consistent with the character and scale of a rural community. The following elements are particularly important: Roads that follow topography and minimize grading; Built environment integrated into the natural setting and topography; Grading that follow natural contours and does not disturb the natural terrain; Structure design and situating that allows preservation of the site's natural assets; Retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas."</p> <p>5. "Require new residential development to construct roads that blend into the natural terrain and avoid "urbanizing" improvements such as widening, straightening, flattening, and the installation of curbs, gutters, and sidewalks. Follow Valley Center's Community Right of Way Development Standards."</p> <p>6. "Buffer residential areas from incompatible activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space."</p> <p>Comment – Neither the SP nor the RDEIR is clear as to which design standards apply. The SP purports to override all county documents and states it prevails over any inconsistent provisions in the GP, VCCP, ordinances or design guidelines. In other places, it states some aspect of the project is consistent with the VC Design Guidelines, implying that they would, nevertheless, be acceptable. The many pictures clearly show urbanized design, out of scale and character for a rural community; the massive grading replaces natural topography for both roads and residences. The request for deviations from road standards is also in direct conflict with these provisions in the VCCP. The RDEIR must, but does not, explain and analyze the environmental effects of these inconsistencies.</p> <p>E. Commercial Goals (VCCP p. 13)</p> <p><i>Commercial uses should be concentrated within the boundaries of these two Village[s]."</i></p> <p>Policies:</p> <p>1. "Prohibit strip commercial development by containing commercial uses in the Cole Grade and Valley Center Road area and the Mirar de Valle Road and Valley Center Road area.</p> <p>9. The Application of Land Use Designation Semi-Rural 2 and regional category of semi-rural lands are proposed for those properties that are currently zoned commercial and located outside of the Villages."</p> <p>Comment – Neither the SP nor the RDEIR deals with the fundamental fact that the VCCP establishes commercial uses only in the two existing Villages, and eliminates commercial uses elsewhere, consistent with smart growth principles and the Community Development Model. The Semi-Rural Land Use Designation for the Project Site is required by both the GP and SP to remain so. The RDEIR</p>	<p>C1e-100 The comment states that the Specific Plan is not clear and does not identify what Design Standards apply.</p> <p>The Specific Plan meets the requirements of the County and Government Code Section 65451 providing direction for the design on the project. Development standards, including design guidelines are set forth in Section III of the Specific Plan. Implementation of these design guidelines assures that the project would be consistent with the rural compatibility policies. For example, Section III(G). Grading Guidelines and Development Standards, requires the use of landform grading and contour grading techniques where appropriate. The Specific Plan includes text and a "diagram" that specifies the distribution, location and extent of all land uses, public and private infrastructure and standards and criteria by which development will proceed.</p> <p>The Specific Plan does not override other County planning documents but rather supplements those plans through specific development regulations by the following:</p> <ul style="list-style-type: none"> • The land uses for the project. (See Specific Plan, Section II (B) for a description of the land uses) • The Specific Plan and zoning restricts building height to 35 feet with the exception of the non-habitable clock tower. • Buffers provide separation between existing agriculture and proposed homes. In some areas where buffers are not provided, the Specific Plan requires that various alternative separation methods be used to separate existing from proposed uses such as grade separation, use of wide lots or more substantial landscaping to buffer existing uses from those proposed by the project. • The Specific Plan also shows the circulation system necessary for the entire project. The Specific Plan identifies the general location of the roadways for the future phases; however, the final design and location would be completed through subsequent discretionary permits, including Tentative Maps, Site Plans and Major Use Permits.
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C1e-100

C1e-101

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	<p>C1e-100 (cont.)</p> <ul style="list-style-type: none">• The trail system is also identified in the Specific Plan and design guidelines are found in Section III of the Specific Plan.• The Lilac Hills Ranch Specific Plan includes Design Guidelines (Section III) that will ensure that development will be consistent and compatible throughout. Detailed lot design and architectural design guidelines are a part of the Specific Plan, which provides a range of styles and sizes to promote architectural variations. All future development applications are required to show compliance through a Site Plan that identifies the lot design and architectural style guidelines, from the Development Standards Tables contained in Section III of the Specific Plan, which will be applied to each lot. The development guidelines that are found in Section III of the Specific Plan allow for and will result in a variety of lot sizes and architectural styles throughout the community.• The Specific Plan also includes the application of the B Special Area Regulator, which would be applied within the areas designated with the C34 Zoning Use Regulation. The B Special Area Regulator is applied to those areas which will include uses subject to the Valley Center Design Guidelines. Similarly the V Setback Regulator will allow the setbacks for each lot to be established when the individual lot configuration is identified for each lot.• Section II-KI of the Specific Plan, provides a Sign Plan, which provides community sign standards on the types of signs, design and locations for project interior signs. Individual sign programs are specified for each residential area as well as the Town Center and Neighborhood Centers, and must meet the stated guidelines. These would be prepared by the project applicant concurrent with Site Plan approval.• Lighting guidelines are located throughout the Specific Plan in Ch. 3, and are specific to each land use. All lighting is designed to be directed downward and designed to minimize glare and intrusion into adjacent properties.
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	<p>C1e-100 (cont.)</p> <ul style="list-style-type: none">• Subsequent to this public review. Section N was added to the Specific Plan to add Green Building Performance standards, in combination with other standards contained within Section III of the Specific Plan. In particular, Section N(1)(a) provides that the Implementing Site Plan shown in Phase 2 shall show the Recycling Facility for the recycling of containers and compost to conserve energy and raw materials. The inclusion of the Recycling Plant is an integral project component.• The Specific Plan, Ch. III, Section D, includes extensive guidelines for grading of all areas of the project beginning on page III-16. The overall shape of the land would remain intact as shown by the grading cross-sections included as Figure 68 in the Specific Plan. The project Grading Plan is at FEIR Figure 1-15. Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of earth to be moved for each home (which would require a minor grading permit on an individual lot basis). This is consistent with projects of this size. 99.7 percent of all steep slopes are retained in open space and private roads are used that reduce grading by reducing the design speeds and overall development foot print, and following the contours of the property.• Section IV Implementation includes a Community Phasing Plan, starting on page IV-1. Construction of the project is anticipated to occur over an eight to twelve year period in response to market demands and to provide a logical and orderly expansion of roadways, public utilities, and infrastructure. The five phases of the project are shown in Figure 15a of the Specific Plan and phasing would be implemented through the recording of the Final Maps. <p>As shown through the detailed design guidelines, the project's roads will follow the topography and minimize grading; project grading will follow the natural contours of the land. Please also refer to the response to comments C1e-77 and C1e-78 above, addressing Community Character. The comment does not explain how exceptions for roadway standards are in conflict with the provisions of the VCCP.</p>
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	<p>C1e-101 The project proposes to amend the General Plan by adding new Village that meets the criteria of Policy LU-1.2. Indeed, the project is a new Village whose structure, design and function are based on the Community Development Model. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues. The project proposes to amend the Valley Center Community Plan adding a third Village. This goal in the Valley Center community plan text will be revised to indicate that there are three Villages in the community plan.</p>
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must, but it does not, explain and analyze the environmental effects of these inconsistencies.

F. Agricultural Policies (VCCP p. 15)

1. "Support agricultural uses and activities throughout the GPA, by providing appropriately zoned areas in order to ensure continuation of an important rural lifestyle in Valley Center.
3. Prohibit residential development which would have an adverse impact on existing agricultural uses."

Comment – Neither the SP nor the RDEIR address this major focus of both the GP and VCCP to 'support' Agriculture, not destroy it. The RDEIR must, but it does not, explain and analyze the environmental effects of this inconsistency.

G. Mobility Policies (VCCP p. 52-53)

2. "Road design shall reflect the rural character and needs unique to the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated."
4. "Road alignment shall minimize the necessity of altering the landscape by following as much as possible the contours of the existing, natural topography without sacrificing safety or sight distance criteria.
5. "Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines."
12. "Where a clear circulation need that benefits the overall community can be demonstrated, public roads consistent with Department of Public Works policy shall be dedicated and constructed. Where appropriate, future subdivisions shall be required to access public roads via at least two separate access points."

Comment – As noted above, neither the SP nor the RDEIR is clear as to which design standards apply. There appears to have been no consideration of: (1) whether this Project can provide two separate LEGAL access points to the public roads; or (2) whether public roads within the Project would provide a clear circulation need that benefits the entire community. The massive grading proposed appears to violate the requirement to minimize altering the landscape and follow existing natural topography. The RDEIR must, but it does not, explain and analyze the environmental effects of these inconsistencies.

H. Fire Protection Policies (VCCP p. 54)

1. "All new development utilizing imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards."

Comment – The continued objections of the Deer Springs Fire Protection District to this Project undermine conclusions regarding compliance with this policy. The RDEIR must, but does not, explain and analyze the environmental effects of this inconsistency particularly when viewed in conjunction with objections from the Fire District.

C1e-101
cont.

C1e-102

C1e-103

C1e-104

C1e-102 The project is consistent with the Agricultural Goals contained in the VCCP. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. Active agricultural areas are included throughout the project as part of the community landscaping. See the FEIR subchapter 2.4 for a detailed discussion on impacts to agriculture. See also comment C1c-60 and C1c-77 above.

C1e-103 The project is consistent with the Mobility Goal contained in the VCCP. The proposed street system is interconnected and provides residents with at least two ways to access the project site via public roads. Roads are curved to fit the topography and are all two-lane, as is appropriate for a village of this size. The circulation plan designs roadways to flow with the natural terrain (see Figure 70). The project does include ten requests for exceptions to County Road Standards as part of this project and are described in Figures 1-4A and 1-4B. The purpose of the exceptions requests are to avoid impacts to surrounding properties and to support traffic calming measures. All of the exceptions being requested for the roadway improvements were included as part of the project's circulation design and considered as a part of the analysis for each subject area discussion within the FEIR. The exceptions could be granted by the County where capacity and safety are not unduly affected. (FEIR, subchapter 2.3.2.3.) The proposed roadway exceptions would not affect road capacity. As detailed in Table 1-2 of Chapter 1 of the FEIR, four of the 10 proposed roadway exception requests would affect design speed. Two of those roads are internal to the project site. See also comment C1e-61 above.

The grading necessary to connect the road system over the 608 acre project has been minimized to the maximum extent feasible consistent with meeting safety and sight distance criteria. The use of private road standards and reduced design speeds reduces the overall roadway footprint and follows the natural contours of the land which results in less grading. The project's Master Landscape Concept Plan reinforces a community theme through the design of streetscapes incorporating natural patterns of street trees, entry monuments using natural or simulated natural materials, and

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	<p>C1e-103 (cont.)</p> <p>landscape zones that reflect areas of prior vegetation, using site specific plant palettes. The streetscapes will also feature meandering paths and informal planting of trees, vineyards, and groves as detailed in Chapter III, Development Standards and Regulations. Community entries and key focal points enhance the rural theme through similar appropriate plant materials and theme signage. All proposed planting and improvements within the public right-of-way for streets within the Community are subject to approval by the County of San Diego's Department of Public Works. (Specific Plan, page II-28.)</p> <p>The Master Landscape Plan also unifies the many neighborhoods and enhance the rural feel of the community. Landscaping will emphasize plants appropriate to the climate of the area and will blend with the natural environment. The Community theme is further reinforced through the design and landscaping of Community recreation areas and the use of groves, drought tolerant and naturalizing plant materials to transition to natural open space areas. Vegetation indigenous to the area is emphasized, supplemented by compatible, non-invasive ornamental plant materials. The public roads have been designed to meet the design requirements of the Valley Center Community Road Design Guidelines. Grading and visual impacts associated with the project's development is discussed in FEIR subchapter 2.1. In addition community landscaping is required to comply with the applicable requirements of the Valley Center and Bonsall Design Guidelines, and the Design Guidelines of this Specific Plan for commercial and mixed-use planting areas. (Specific Plan, page II-28.)</p> <p>C1e-104 The comments from DSFPD that are referred to herein are out of date and do not reflect the new comment letter provided by DSFPD, dated July 28, 2014. See Global Response: Fire and Medical Services. With respect to the project provision of all required fire suppression infrastructure, please refer to FEIR subchapter 2.7.</p>
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<p>I. Education Policies (School Facilities) (VCCP p. 54)</p> <p>1. "Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding." <i>Comment – No school district has accepted the possible additional students generated by the Project. The potential school site will be converted to residences transferred from within the Project if not accepted by a school district. The RDEIR must, but does not, explain and analyze the environmental effects of these inconsistencies.</i></p> <p>J. Open Space Policies (VCCP p. 62)</p> <p>2. "Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible." 5. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space." <i>Comment – The SP only tentatively designates a temporary 3.2-acre private park site that may be built up to 5 years after the final map is recorded for Phase 1. The 13.5-acre public park in Phase 3 may be built up to seven years after the final map is recorded for Phase 1. The Project minimally meets the Park Lands Dedication Ordinance requirement of 3-acres per 1,000-population requirement, and at about 5-acres of public and private parks per 1000 new residents the Project falls woefully short of the 10-acres per 1,000 population GP goal for parks.</i></p> <p>Overall Project site planning appears to destroy any existing connectivity for animal movement, instead of creating or maintaining a functional open space system. The Project design creates an isolated urbanized compound totally unrelated to its surroundings. This will be a closed community of urban sprawl, not one with "openness and access to surrounding open space." The RDEIR must, but does not, explain and analyze the environmental effects of these inconsistencies.</p> <p>IX. CONCLUSION</p> <p>The Accretive Lilac Hills Ranch RDEIR fails to meaningfully analyze an unprecedented number of project inconsistencies with the County General Plan and the Valley Center Community Plan. The SP and RDEIR fail to substantiate the limited GP consistency discussion with facts and evidence and fail to justify exemption from the clear prohibitions against Leapfrog development exemplified by this Project. These informational shortcomings deprive the public and the decision-makers of essential information required by CEQA. Under the circumstances, the RDEIR must be rewritten and recirculated for public review and comment.</p>	<p>C1e-105 The comment states that no school district has accepted the additional students that would be generated by the Project.</p> <p>Subchapter 3.1.5.1 provides that based on the increased student body associated with the project, there would not be adequate capacity in the local schools to serve the project's student generation. However the school districts had indicated that Valley Center Elementary Upper School which is currently closed, could re-open to accommodate students. Additionally, BUSD has indicated its ability to place temporary portable classrooms on existing school sites as an interim solution to the new students. In addition a proposed school site would be offered to the local districts or could be used as a private school if not accepted by the school districts. In addition, the applicant will be required to pay school impact fees pursuant to California Government Code Section 65996(b).</p> <p>C1e-106 and C1e-107 The project requires 15.09 acres of public parks pursuant to the Park Land Dedication Ordinance (PLDO). The project would exceed this requirement by providing 23.6 acres of parkland. As shown in FEIR Figure 1-9, the project would provide numerous parks located throughout the project site including a 13.5-acre public park (gross acres). As detailed in the Specific Plan Section III, the project includes provision for private recreation areas to include dog parks, play structures, sports courts and fields, multi-purpose trails, and recreational centers.</p> <p>The 10-acre per 1,000 is a County Goal for the provision of public parks and does not pertain to park obligations related to private development as set forth in State law. Therefore, this policy does not apply to the project and no inconsistency issue is created based on the acreage of park being provided by the project. However, the private developer would contribute to this goal by providing parks in accordance with State Law and the PLDO.</p> <p>C1e-108 Please refer to Global Response: General Plan Amendment CEQA Impact Analysis and Appendix W.</p>
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