

Letter C1f

Chapter 4: Project Alternatives 1

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

Valley Center Community Planning Group Comments:

Chapter 4: Draft Environmental Impact Report (DEIR) Project Alternatives

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

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

Overview

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

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

There are no issues with either the selection as an Alternative or analysis performed for the No Project/No Development Alternative, No Project / Existing Legal Lot Alternative, and General Plan Consistent Alternatives.

There is a full Environmental Impact for these Alternatives provided by the San Diego

C1f-1

C1f-2

C1f-3

C1f-1

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C1f-3

This comment is an introduction to comments that follow. No further response is required.

The County does not agree that the DEIR objectives are biased and that the project does not meet its own objectives. The project objectives were developed pursuant to CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project. In addition, the project's objectives aided in developing a reasonable range of alternatives. Responses to the comment about the Downtown Escondido Specific Plan Area Alternative are addressed further in the letter and in these responses. Remaining comments are addressed in detail in the remainder of these responses.

This comment restates information in the FEIR and expresses support for the General Plan Consistent alternative. This comment is noted.

LETTER

RESPONSE

<p>County General Plan dated August 3, 2011. All three of these alternatives were in the baseline (or close enough for measurement error) for the General Plan. The relevant Environmental Impact has been disclosed and analyzed in sufficient detail as part of the recent General Plan process.</p> <p>The Communities of Bonsall and Valley Center support the General Plan Consistent Alternative as the proper land use and zoning for this Project. The 110-unit residential density with A70 zoning is the maximum density land use that the Circulation Element Road Network will support without Direct Development Impact.</p> <p><u>1- DEIR Objectives are biased and should be changed</u></p> <p>The legal adequacy of selecting many of the seven Project Objectives does not conform to the requirements of the California Environmental Quality Act (CEQA). Our detailed analysis is found in Valley Center Community Planning Group Comments, Chapter 1, pp. 1-10.</p> <p><u>2 - The Project does not meet its own Objectives, when fairly assessed</u></p> <p>Consistency with Objective One – THE PROJECT IS INCONSISTENT WITH OBJECTIVE ONE</p> <p>The full text of Objective One is below:</p> <p>“Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County’s Community Development Model for a walkable pedestrian-oriented mixed-use community.”</p> <p>The proposed Lilac Hills Ranch Subdivision is a classic urban sprawl development. All of the transportation will be via automobiles, and the existing and proposed Project post-construction road infrastructure does not support the 9-fold increase in traffic and related Direct Development Impact the Project generates to the public road network.</p> <p>A fundamental premise of Smart Growth is to lower automobile dependency as compared to average Development. The Accretive proposed Lilac Hills Ranch Development does not comply with Smart Growth Principles.</p> <p>The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip.</p> <p>The Accretive Urban Sprawl (AUS) project is proposing an automobile based urban sprawl community that even with exceedingly high internal trip rates is 47% higher than the San Diego County average (8.52/5.8) trip distance.</p> <p>How is the Lilac Hills Ranch proposed development Smart Growth?</p> <p>The ONLY mass transit that exists is the North County Transit District (NCTD) Bus</p>	<p>C1f-3 (cont.)</p> <p>C1f-4</p> <p>C1f-5</p> <p>C1f-4 The County does not agree that the project objectives do not conform to CEQA. They were developed pursuant to CEQA Guidelines Section 15124(b). The comment references comment letter C1c. Detailed responses to the issues raised in that letter can be found in those responses.</p> <p>C1f-5 Refer to response to comment C1s-3.</p>
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Routes 388 and 389. The closest access is at SR 76 and Old Highway 395, a minimum 4-mile trip north from the project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido Transit Center. If you are going to a regional shopping center or work center, you must take a 30-minute bus ride to the Escondido Transit Center and transfer to another route. The mass transit system only works if you are a Casino patron.

This Project is not consistent with the San Diego County Community Development Model. It is Inconsistent with the Community Development Model which a subset of the San Diego General Plan. Why does the first Objective ignore the balance of the General Plan? Because the Proposed Project is patently inconsistent with the San Diego County General Plan, as well as the Community Development Model within the General Plan.

Consistency with Objective Two – **THE PROJECT IS INCONSISTENT WITH OBJECTIVE TWO**

The full text with comment areas is below:

“Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.”

“in a manner that encourages walking and riding bikes” - With 10 Exceptions to Road Standards, the Covey Lane/West Lilac and Mountain Ridge/Circle R intersections, and the traffic load the Project will throw on internal and external roads, **who is going to risk taking a walk or riding a bike? The project reduces the safety aspects of the local roads for the current level of bicycling activity, as the project does not address improving the local roads that encompass the development. Significant safety degradation will occur on Circle R and West Lilac and on West Lilac between Circle R and Old Castle with the lack of bicycle lanes and turnout areas.**

“public services and facilities that are accessible to residents of both the community and the surrounding area” – There are two issues with this statement.

The first issue: what are the public services and facilities in this Project? A vague statement about a K-8 school site without any commitment to financing or endorsement by the School District, a vague description of the minimum acreage of Parks the County requires? Does the undefined Commercial content include a Supermarket or community market? A restaurant of any kind? A retail gasoline service station?

The second issue: “accessible to residents of both the community and the surrounding area” – Accretive’s Traffic Impact Study does not show an influx of non-residents to the area. **Is this because the Applicant is overly optimistically portraying the true Traffic Impact and related Direct Development impact of this Project?**

C1f-5 (cont.)

C1f-6

C1f-7

C1f-8

C1f-6 The project includes an extensive and thoroughly integrated, 16 plus mile Trail Network, including community pedestrian and bike paths, linking together the major project components, including the Town Center and Neighborhood Centers, Neighborhoods, the K-8 school, and the 13.5-acre central park. The trails include a staging area in the Town Center, and provide three trail connections at the north and south ends of the project to trails defined in the County Master Trail Plan. See FEIR, Figure 1-4a (Lotting Study) and Figure 1-8 (Trails Plan) showing the integration of the project as a whole with the Trail Network. Also, project parks and trails are designed to be integrated with the dedicated 104.1-acre Biological Open Space. The FEIR, Figure 1-9 (Open Space and Parks) illustrates this for example, in showing adjacency of the Biological Open Space to four parks, including the 13.5-acre main community park, and to the K-8 school site recreational area. Additional perimeter trails provide linkages to the County Master Trail Plan and will also allow equestrian usage. The road exceptions would not hinder the provision of trails to support walking and biking and will not degrade safety. Road exceptions are not approved if they would affect the safety of roads for vehicles, pedestrians, or bicyclists.

C1f-7 As discussed in subchapter 3.1.5 of the FEIR, various public services would serve the project including fire protection and law enforcement, schools, parks, and libraries. A school site has been identified within Phase 3 of the project site for potential acquisition by a school. As the project cannot guarantee that the school will acquire the site, the future construction of a school cannot be guaranteed. However, for purposes of the FEIR, the project will appropriately pay school fees to offset the cost of increasing enrollment from the community. As shown on Figure 1-9, the project would provide numerous parks located throughout the project site including a 13.5-acre public park, 10.1 acres of private parks, and a 2.0-acre private recreation facility. The public park would be dedicated to and owned by the County, and maintained by the HOA. At this time commercial areas are identified in the Specific Plan without specificity to tenants or specific uses. As those areas are developed in the future, site plans or use permits would be processed that include more detail on the type of use proposed, in accordance with the Specific Plan.

Also, refer to response to comment C1s-4.

LETTER

RESPONSE

<p>Consistency with Objective Three – THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE EQUALLY CONSISTENT WITH OBJECTIVE THREE</p> <p>The full text is below:</p> <p>“Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.”</p> <p>All Alternatives are required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) that must comply with this Objective.</p> <p>Consistency with Objective Four – THE PROJECT IS INCONSISTENT WITH OBJECTIVE FOUR</p> <p>“Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.”</p> <p>There are three issues with this Objective. The first issue is that the Objective is so vague and subjective that compliance is not measurable.</p> <p>The second issue is with the statement: “Integrate major physical features into the project design, including major drainages, and woodlands”</p> <p>How is taking 608 acres of Rural Land primarily involved in Agriculture, disturbing 504 acres, and creating large areas of impermeable surfaces consistent with this Objective? The Project includes 83 acres of road surface and 68 acres of manufactured slopes. Is it desirable to increase storm water runoff volume and velocity with impermeable surfaces? Does introduction of large quantities of urban surface water runoff Total Dissolved Solids and Pathogens benefit the woodlands? In addition, the large quantities of urban surface water runoff Total Dissolved Solids and Pathogens will flow down to Moosa Creek and then into the San Luis Rey River and watershed, and finally out to the ocean.</p> <p>The third issue is with the statement that follows: “creating a hydrologically sensitive community in order to reduce urban runoff.”</p> <p>Accretive is proposing disturbing 440 acres of 608 total acres of rural farm land and populating a high percentage of the 440 acres with impermeable surfaces. Is this what a hydrologically sensitive community is?</p> <p>Consistency with Objective Five – THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE</p>	<p>C1f-8 Services available within the project site would be available to the public. Trip generation rates for the project were developed based on SANDAG’s Guide to Vehicular Traffic Generation Rates for the San Diego Region (April 2002), ITE (Institute of Transportation Engineers) Trip Generation Manual (8th Edition). Table 2.3-10 (also see TIS [Appendix E] Table 4.8) lists the daily trip generation rate utilized for each of the land uses proposed as part of the project. The trip distributions used for the analysis are adequate and do not underestimate trips because existing traffic would already be accounted for on area roads.</p> <p>C1f-9 This comment states general background information but does not raise any environmental issue; therefore, a detailed response is not provided.</p> <p>C1f-10 The project has achieved the objective through integrating the sensitive woodland habitats and drainages into the biological open space, designing the project with use of low-impact development techniques to preserve natural drainages and minimize concentrated hydrological flows. All storm water flows would be directed to on-site, grass-lined detention basins, as described in the project Drainage Plan, for settling and filtration prior to discharge off-site through both natural and man-made drainages. The Drainage Plan includes measures such as planting shallow drainage slopes to prevent erosion and siltation. The Project Drainage Plan must meet applicable local, state, and federal standards, be approved by the Department of Public Works, and maintained by either the Public Works Flood Control Division or the HOA. Natural drainages within the project site are further protected by the Resource Management Plan, to protect 104 acres of biological open space, including natural drainages throughout the site, as detailed in the FEIR Table S-1, mitigation measures M-BIO-2. As demonstrated in the FEIR, including Appendices U-1a, U-1b, U-2a, and U-2b, the project would not increase runoff or total dissolved solids or pathogens into downstream water bodies.</p> <p>C1f-11 This comment is noted.</p>
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LETTER

RESPONSE

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The full text is below:

"Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area."

Any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) must comply with this Objective.

Consistency with Objective Six – THE PROJECT IS CONSISTENT WITH OBJECTIVE SIX BECAUSE THE OBJECTIVE IS BIASED IN FAVOR OF THE PROJECT

The full text with comment areas highlighted is below:

"Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing."

In this Objective, **the County re-brands dense Urban Sprawl as a desired attribute.** The General Plan Alternative does not meet this objective, because it does not have Urban Density mixed use.

This Objective is another example of where **the County has structured the Objectives of the EIR so narrowly with an intended bias such that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives. This approach leads to a self-serving and biased environmental analysis.**

Consistency with Objective Seven – THE PROJECT AND MOST ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE SEVEN

The full text is below:

"Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses."

Developing the Project at General Plan densities and preserving agriculture and residential based businesses (such as the existing Accretive Agricultural Operations Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this Objective **perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.**

3 - 4.1.1.1 Alternative Location – the Downtown Escondido Specific Plan Area (SPA) has been deficiently ignored.

C1f-11
(cont.)

C1f-12

C1f-13

C1f-14

C1f-12 This comment is noted. The County does not agree that this is a biased objective. The project objectives were developed pursuant to CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project.

C1f-13 This comment is noted.

C1f-14 The County disagrees that the project is required to include the Escondido Downtown Specific Planning Area (located nearly 15 miles away from the proposed project) as an off-site alternative in the FEIR. Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The CEQA Guidelines provide several factors that should be considered with regard to the feasibility of an alternative: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control or otherwise have access to the alternative site (if an off-site alternative is evaluated). The suggested Escondido alternative is outside the jurisdiction of the County of San Diego and would, therefore, fail to meet the project objective of providing a range of diverse housing types with the jurisdiction of the County of San Diego. The County's General Plan Housing Element Background Report which identifies senior housing as a need for future accommodation by new development. The Village style design of the project offers particular advantage to senior populations via providing proximity to services and shopping. locating senior housing in another jurisdiction does not assist the County in accommodating its fair share of housing needs for the elderly.

C1f-14 (cont.)

The range of proposed housing types in the proposed project also includes single-family detached homes abutting open space. This housing type cannot be duplicated in a small-lot urbanized environment such as the Escondido Downtown Specific Plan Area (see Figure II-4, page II-12, of the Escondido Downtown Specific Plan, which Figure is attached) that lacks any adjacent open space areas.

Also, the applicant cannot reasonably, economically and timely acquire a large block of parcels under the Escondido alternative that are necessary to develop a comparable project that includes single-family detached homes and single-story senior housing. As shown in Figure II-4, page II-12, of the Escondido Downtown Specific Plan, the Escondido Downtown Specific Plan residential areas are comprised almost exclusively of very small legal parcels that are already developed. Those parcels are mostly in separate fee title ownership. The applicant would therefore be required to negotiate for and acquire hundreds of separate occupied and operational legal parcels from diverse ownership interests to assemble land for a comparable development project. Also, the existing structures on most of the parcels would have to be demolished, and any existing business operations and uses on those parcels, many of which are medium to long-term leases, would also have to be relocated at significant cost to the project applicant as part of any purchase transaction for a parcel. Such tasks are unrealistic, costly, and infeasible. Please refer to the December 16, 2014 letter from project applicant regarding the Escondido Downtown Specific Plan submitted to the County.

The alternatives evaluated in detail within the alternative subsection include: (1) No Project/No Development Alternative, (2) No Project/Existing Legal Lot Alternative, (3) General Plan Consistent Alternative, (4) Reduced Footprint Alternative, (5) Reduced Intensity Alternative, (6) 2.2 C Alternative, (7) Roadway Design Alternative, and (8) Mountain Ridge Road Fire Station Alternative. Each of these alternatives was selected in order to either: (1) avoid or minimize significant impacts associated with the project, or (2) compare potential effects with the General Plan Consistent alternative, which is considered a viable development option for planning purposes.

The County of San Diego has wrongly excluded qualifying Alternative locations presented by the Public
I) THE DEIR DOES NOT INCLUDE THE DOWNTOWN ESCONDIDO SPA ALTERNATE SUBMITTED BY PUBLIC COMMENT VIA LETTER [Ltr. 8-19-13 Project Alternatives] OR REASONABLY STATE WHY IT WAS EXCLUDED FROM CONSIDERATION.

II) THE COUNTY'S RATIONALE FOR ALTERNATIVE SITE EXCLUSION IS BIASED, INTERMINGLES RATIONALE FOR EXCLUSION OF VALLEY CENTER VILLAGES WITH THE ESCONDIDO DOWNTOWN SPA, AND MOST IMPORTANTLY IS UNSUBSTANTIATED.

a). On page 4-5 the RDEIR states:
 "With respect to an off-site location, there is no other similarly sized (600+ acres) parcel, or group of contiguous parcels available for assembly that is available for development as a compact village, close to I-15, in the Valley Center-Bonsall area. The location of the project within the I-15 corridor is important to meet the first project objectives due to the proximity of the freeway and other infrastructure and services needed to serve the residents of the project."

This statement has three elements that are either misleading or patently false:

1. "there is no other similarly sized (600+ acres) parcel, or group of contiguous parcels available for assembly that is available for development as a compact village"

The Downtown Escondido Specific Plan Area (SPA) has availability for Development, at higher densities than the Project. The relevant measure should be Equivalent Dwelling Units, not raw acreage. The Downtown Escondido SPA site has more available capacity for the residential and commercial land uses the Project proposes and already IS a compact village. The Downtown Escondido SPA also has superior access to mass transit than the Project does.

2. "close to the I-15"

The Downtown Escondido SPA is **closer** to the I-15 than the Project.

3. "in the Valley Center-Bonsall area"

WHERE DO THESE SELECTION CRITERIA COME FROM? The relevant objective is Objective 1 - Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community. **THE OBJECTIVE STATES "northern San Diego County," not Bonsall-Valley Center. Escondido is in northern San Diego County. The Downtown Escondido SPA meets the County's Objectives.**

b). On page 4-5 and 4-6 the DEIR states:
 "This project would create a new Village, providing an additional location within the VCCP area with services and housing opportunities. The project area is positioned in proximity to the I-15 and within existing districts for sewer water and fire service. There

C1f-14 (cont.)

C1f-15

C1f-14 (cont.)

These alternatives permit informed decision making and public participation because there is enough variation amongst the alternatives to provide a reasonable range. As required under CEQA, the alternatives would avoid or minimize significant impacts associated with the project while also meeting the project objectives. The alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic objectives of the project. Please refer to Table 4-2 for a breakdown of project alternatives impact comparison.

The alternative posed by the commenter would not serve any new purpose, and therefore, is not needed to create a "reasonable range" as required by CEQA.

CEQA does not require in-depth review of a project alternative which cannot be realistically considered and successfully accomplished. The proposed alternative site is not under the ownership of the project proponent and is not located within the jurisdiction of the County of San Diego.

An alternative site in the County for the project was considered taking into account a number considerations including the existing General Plan (or Community Plan) land use designations, and availability of infrastructure. No other similarly sized (600+ acres) parcel, or group of contiguous parcels available for assembly, was available for development that met the Project's objectives. The two village sites identified in the Valley Center Community Plan) were considered and rejected.

The suggested Downtown Escondido Specific Plan project is not a feasible project alternative and the Draft REIR already includes a reasonable range of alternative.

is an adequate road network offering multiple routes throughout the project and would which ultimately connect with freeway ramps to I-15. Placing the project in another location may result in additional issues related to traffic and services.”

With respect to the Downtown Escondido SPA, this statement is incorrect as is substantiated below:

- 1. “Placing the project in another location may result in additional issues related to traffic and services.”

The Downtown Escondido SPA is a superior location for traffic and services, generating far fewer Vehicle Miles Traveled than the Project. This argument is without merit.

c). On page 4-6 the RDEIR states:
“Further, the applicant already owns the project site and cannot reasonably acquire an alternative site. Thus, in accordance with CEQA Guidelines Section 15126.6(f), the acquisition of an alternative location would be considered infeasible.”

With respect to the Downtown Escondido SPA, this statement is incorrect. The County’s rationale lists only two of the seven **non-exclusive factors** contained in CEQA Guidelines Section 15126.6(f). The Downtown Escondido SPA Alternate is consistent with the majority of the seven non-exclusive factors included in of CEQA Guidelines Section 15126.6(f) **and an analysis of the Downtown Escondido SPA Alternate must be included in the Project DEIR.** Refer to the entire discussion on page 3 of Ltr 8-19-13 Project Alternatives (attached),

d). on page 4-6 of the RDEIR, the County concludes:
“Therefore, an alternative location was considered but rejected because of the (1) lack of a suitable-sized site, (2) lack of a site located in proximity to I-15 and existing service areas, (3) lack of ability to reduce VMT the potential for greater GHG emissions and traffic impacts, and (4) that the proponent cannot reasonably acquire an alternative site.”

This conclusion has no substance for any of the four arguments presented in favor of the Project. Substantiation of this statement is below:

- (1) lack of a suitable-sized site – **The Downtown Escondido SPA Alternate has more capacity than the Project in each of its land use categories.**
- 2) lack of a site located in proximity to I-15 and existing service areas- **The Downtown Escondido SPA Alternate is in closer proximity to I-15**
- (3) lack of ability to reduce VMT the potential for greater GHG emissions and traffic impacts – **The Downtown Escondido SPA Alternate has far fewer VMT, GHG emissions, and traffic impacts**

C1f-15 (cont.)

C1f-16

C1f-17

C1f-14 (cont.)

The FEIR alternative site analysis was completed in compliance with CEQA Section 15126.6. Accordingly, the alternative site criteria utilized was based on the ability of the site to meet the basic project objectives, the ability of the proponent to reasonably acquire the alternative site, and the location of the site within County-jurisdictional area. For clarification, the “northern San Diego County” area referenced in the objectives is referring to the northern County area under the jurisdiction of the County of San Diego. The County cannot direct development in areas outside their jurisdiction, such as the incorporated City of Escondido area. Regardless of if the Downtown Escondido SPA meets some of the project’s objectives, the FEIR includes a reasonable range of alternatives and need not consider every conceivable alternative to a project.

C1f-15 Please see response to comment C1f-14.

C1f-16 See response to comments C1f-14. Any of the factors identified in CEQA Section 15126.6(f) may be reasons to determine an alternative is not feasible, not all seven factors are required to determine infeasibility.

C1f-17 See response to comments C1f-14-14.

(4) that the proponent cannot reasonably acquire an alternative site – **The statement may or may not be true, but by itself it is not sufficient rationale to exclude the Downtown Escondido SPA Alternate.**

In conclusion, the County of San Diego **MUST INCLUDE IN THE RDEIR A REASONABLE ALTERNATE – THE DOWNTOWN ESCONDIDO SPA AND EVALUATE THE ABILITY OF THE ALTERNATE TO SATISFY PROJECT OBJECTIVES.**

C1f-17
(cont.)

4 - 4.1.8 Road Standard Design Exceptions –THE COUNTY SHOULD NOT ACCEPT ANY OF THE ROAD EXCEPTIONS

There are potential safety Hazard issues with of these Exceptions. The County has not performed and shared with the Public any Hazard analyses on nine of the proposed Road Exceptions.

C1f-18

The County has only performed and disclosed to the Public Hazard Analysis on a single Exception – Exception # 7 Mountain Ridge Design Speed. The “analysis” consists of less than a page on page 11 of the Traffic Impact Study, and this analysis has many unsubstantiated assertions. The “hazard analysis of Exception #7 Mountain Ridge Design Speed is discussed below.

The Applicant asserts the following on page 11 of the Traffic Impact Study (TIS):

“ii. HAZARDS DUE TO AN EXISTING TRANSPORTATION DESIGN FEATURE
Mountain Ridge Road is a residential serving road with several vertical curves and design speed as low as approximately 5 mph along certain sections. Since the road is not currently built to County private road standards, an assessment according to Section 4.6 of the County Guidelines was completed considering the following factors:

- 1) Design features/physical configurations of access roads may adversely affect the safe movement of all users along the roadway.
- 2) The percentage or magnitude of increased traffic on the road due to the proposed project may affect the safety of the roadway.
- 3) The physical conditions of the project site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, may result in conflicts with other users or stationary object.
- 4) Conformance of existing and proposed roads to the requirements of the private or public road standards, as applicable.

C1f-19

The following is a discussion of each of these four individual factors:

C1f-18 The comment represents the opinions of the commenter and further serves as an introduction to comments that follow. Therefore, no response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

C1f-19 The comment restates information contained in the TIS, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue with respect to the FEIR, no further response is required.

1) There are several vertical curves along Mountain Ridge Road, some of which have grades exceeding 20%. The design speed along certain sections is only about 5 mph as constructed. Therefore, due to the presence of these curves and the design speed below County Standards, it is concluded that the current road may adversely affect the movement of users.

2) The project is forecasted to increase the ADT on Mountain Ridge Road from the current 160 ADT to 1,190 ADT. While this is a high percentage increase, an ADT of 1,190 ADT is only about 2 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway.

3) The presence of several vertical curves was described in Item 1) above. There are no horizontal curves on the roadway, nor are there any slopes, walls, or barriers that could cause conflicts. Therefore, no issues are expected due to this item.

4) Table on the previous page shows County private road standards for various roadway types depending on the level of ADT served by the roadway. Two columns were added to the Table. The first is an indication of each of the measurable criteria for Mountain Ridge Road. As can be seen, Mountain Ridge Road meets the standards of a 751-2,500 ADT road in all cases except for the vertical design speed. Since Mountain Ridge Road currently has design features, namely several vertical curves, that may affect the movement of users (#1) and does not fully conform to County private road standards (#4), it is concluded that a potentially significant impact could occur in terms of roadway hazards. The improvements being made to the existing Mountain Ridge Road are to widen the paved width from 20 feet to 24 feet, as well as lengthening one of the vertical curves to increase the minimum design speed from 5mph to 15 mph."

Public Comments regarding this purported "Hazard analysis of Road Exception #7 – Mountain Ridge Design Speed"

THE APPLICANT AVOIDS DISCUSSION OF MEASURABLE METRICS IN THE PRIVATE ROAD STANDARDS AND USES "Section 4.6 of the County Guidelines" TO CONSTRUCT ARGUMENTS BASED ON GENERAL VAGUE OBJECTIVES, RATHER THAN MEASUREMENT AGAINST A STANDARD.

Provide a complete reference to "Section 4.6 of the County Guidelines" – there is no such section in County Private or Public Road Standards.

Below are specific questions regarding the "Hazards Analysis":

"1) There are several vertical curves along Mountain Ridge Road, some of which have grades exceeding 20%. The design speed along certain sections is only about 5 mph as constructed. Therefore, due to the presence of these curves and the design speed below County Standards, it is concluded that the current road may adversely affect the movement of users."

C1f-19
(cont.)

C1f-20

C1f-21

C1f-20 Section 1.2 of the traffic study does reference the County private road standards in conducting the analysis of Mountain Ridge Road. The table on page 11 compares several metrics including graded width, improved width, vertical design speed, and maximum grade.

C1f-21 The driveways around Mountain Ridge Road serve only a very small amount of traffic and, therefore, an analysis of these locations is not warranted based on County guidelines. CEQA does not require a quantitative analysis of very rare speculative occurrences such as the impact to a roadway of a full evacuation scenario.

LETTER

RESPONSE

<p>When a structured quantitative analysis is performed, the more appropriate statement is: IT IS A SAFETY HAZARD. Please answer why an analysis of the multiple driveway/road intersections was not done. Many of the driveways have blind intersections, and vehicles might be backing into the road in reverse. Please also comment with a quantitative analysis on safety of design at full Emergency Access traffic loading in an Evacuation Scenario with all Access gates open.</p> <p>“2) The project is forecasted to increase the ADT on Mountain Ridge Road from the current 160 ADT to 1,190 ADT. While this is a high percentage increase, an ADT of 1,190 ADT is only about 2 cars per minute during peak periods, and this amount would not significantly contribute to any safety issues along the roadway.”</p> <p>As we have commented in RDEIR Subchapter 2.3 Traffic, there is required substantiation from the County on why the build out Project traffic estimate on Mountain Ridge changed from 2260 ADT to 1190 ADT. The County has yet to explain where the 1070 ADT traffic load went. The only conclusion supported by facts is that in reality, Project traffic loads are considerably higher than the as yet unsupported 1190 ADT.</p> <p>The County has again not assessed Hazards at Emergency/Evacuation traffic loading.</p> <p>THERE ARE SIGNIFICANT HAZARDS WHEN QUANTITATIVE FACTORS ARE OBJECTIVELY ANALYZED</p> <p>“3) The presence of several vertical curves was described in Item 1) above. There are no horizontal curves on the roadway, nor are there any slopes, walls, or barriers that could cause conflicts. Therefore, no issues are expected due to this item.”</p> <p>When a structured quantitative analysis is performed, the more appropriate statement is: IT IS A SAFETY HAZARD. Please answer why an analysis of the many driveway/road intersections obscured by trees and bushes was not done.</p> <p>“4) Table on the previous page shows County private road standards for various roadway types depending on the level of ADT served by the roadway. Two columns were added to the Table. The first is an indication of each of the measurable criteria for Mountain Ridge Road. As can be seen, Mountain Ridge Road meets the standards of a 751-2,500 ADT road in all cases except for the vertical design speed. Since Mountain Ridge Road currently has design features, namely several vertical curves, that may affect the movement of users (#1) and does not fully conform to County private road standards (#4), it is concluded that a potentially significant impact could occur in terms of roadway hazards. The improvements being made to the existing Mountain Ridge Road are to widen the paved width from 20 feet to 24 feet, as well as lengthening one of the vertical curves to increase the minimum design speed from 5mph to 15 mph.”</p>	<p>C1f-21 (cont.)</p> <p>C1f-22</p> <p>C1f-23</p> <p>C1f-23</p> <p>C1f-24</p> <p>C1f-24</p> <p>C1f-25</p> <p>C1f-22 The 1,190 ADT forecast is correct for Mountain Ridge Road. Only Phase 5 of the project will have access to Mountain Ridge Road; hence, the lower traffic projection on this roadway.</p> <p>C1f-23 The adequacy of fire and emergency response service is evaluated in Chapter 2.0, subchapter 2.7.2.4 of the FEIR and Appendices J (Fire Protection Plan) and K (Evacuation Plan). The project's Evacuation Plan includes multiple components intended to create an orderly and safe evacuation of the project site in time of emergency. As discussed in subchapter 2.7 of the FEIR, the Evacuation Plan details evacuation routes, evacuation points, and implementation of a resident awareness and education program to keep future residents and employees informed and safe if wildfire occurs. A quantitative analysis of the traffic volumes on roadways during emergency evacuation is not required because delays during evacuation are expected and normal.</p> <p>C1f-24 As explained in response to comment C1f-21, the driveways along Mountain Ridge Road do not require a quantitative analysis.</p> <p>C1f-25 The Mountain Ridge Road/Circle R Drive intersection was analyzed and sight distance requirements would be met and verified during implementation of a future implementing Tentative Map for this area. The road modification proposed is intended to alleviate any hazards associated with the roads current design. The existing sight distance issue at Mountain Ridge Road and Circle R Drive has been resolved by means of vegetation clearing along Circle R Drive completed by the County. As detailed in Chapter 1.0 of the FEIR a Clear Space easement would be required at this location to assure the ongoing adequacy of the sight distance. Refer also to Global Response: Easements (Covey Lane and Mountain Ridge Roads) for details on the sight distance analysis that was completed.</p>
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We take issues with several statements made here. First of all, the County has not performed a Hazards Analysis against Private Road Standards consistently. This "table" does not analyze conformance with Sight Distance Lines at Intersection with Public Roads. Mountain Ridge Road as proposed does not meet Sight Distance Line requirements at the intersection with Circle R Drive Public Road.

C1f-25 (cont.)

Another interesting "oh, by the way" disclosure in Table 7.2 of the TIS is the fact that the Project proposes grading improvements on Parcels 129-300-31 and 129-300-36 to lengthen vertical curves. Please provide evidence that there are adequate Project rights for construction of these improvements, including temporary encroachment permissions for construction that enable continued use of the road by Residents during construction.

C1f-26

CONCLUSION
A REASONABLE AND UNBIASED EVALUATION FINDS THAT THERE IS A SIGNIFICANT HAZARD SHOULD ROAD EXEMPTION #7 MOUNTAIN RIDGE REDUCED DESIGN SPEED RECEIVE APPROVAL. APPROVAL SHOULD BE DENIED FOR ALL ROAD STANDARD DESIGN EXCEPTIONS.

C1f-27

COMMENT III - 4.1.9
Mountain Ridge Fire Station Public Road Alternate –THE COUNTY SHOULD NOT CONSIDER THIS ALTERNATE FEASIBLE.

The Deer Springs Fire Protection District (DSFPD) does not accept this location as a solution for Fire Service for the Project, and has stated so in its June 2014 Public meeting, which is recorded in the meeting minutes.

This Alternate is being proposed by the County to provide the logic for taking Right of Way Rights via County Condemnation proceedings from private citizens to enable the Project to construct an Access Road in compliance with Road Standards and also to provide Pipeline Access to the Lower Moosa sewer facility.

C1f-28

This Alternate does not meet the requirements of Board Policy J-33, since it proposes encroachment on three residential structures and does not meet other J-33 requirements.

Conclusion

ALTERNATE 4.9 MOUNTAIN RIDGE FIRE STATION PUBLIC ROAD ALTERNATE IS NOT FEASIBLE AND SHOULD BE ELIMINATED AS AN ALTERNATIVE TO THE PROJECT.

C1f-26 The referenced table does not refer to the two referenced APNs; therefore, it is unclear what area of the FEIR the comment is referring to.

C1f-27 The commenter states that all roadway standard design exceptions should be denied. This is not a comment on the adequacy of the FEIR; therefore, a detailed response is not required.

C1f-28 See Global Response: Fire and Medical Services.

5 - The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives

These three "Alternatives" are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis. Table 1 below displays all of the information provided in the DEIR with the exception of a one-page map for each Alternative:

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

C1f-29

C1f-29 Table 1 presented in this comment, is reflective of Table 4-1 that was circulated in the June 2013 EIR. This table was revised in 2014 when the Draft Revised EIR was sent out for public review. As now shown in Table 4-1 in the FEIR, all columns add to a total of 608 acres. Table 4-1 in the FEIR provides a matrix of the proposed land uses for each of the Alternatives. This table is accurate and does not require revision. These alternatives are valid alternatives and are adequately described in the FEIR. The information and analysis in Chapter 4.0 provides sufficient detail to complete an adequate analysis of impacts associated with each alternative.

The major observation from independent experts is that these three Alternatives are linear scaled variants of the project with inadequate detail to assess Environment Impact.

These Alternatives are described inadequately. The Applicant's information has multiple math errors (refer to Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives). The only other information provided is a one page Map that in two Alternatives did not even perform lot allocation (Attachment C- Reduced Footprint Map

and Attachment D- Reduced Intensity Map).

This is a deficient level of detail to assess Environmental Impact. There is no definition of Commercial uses and zoning. Despite the naïve arm waving in DEIR Chapter 4, traffic impacts are not linear mathematical relationships. And the list of similar issues to Traffic is very long.

In the interest of brevity, **this is inadequate information to make an informed Environmental decision.**

6 - The Alternatives were not fairly assessed in the RDEIR by the Applicant.

Table 2 below rates scoring of Alternatives **against the Applicant's biased seven Objectives**. The rationale for assessing the Project is contained in Item 2. The three variant Alternatives are scored the same as the Project, except for the 2.2C Hybrid Alternative. The 2.2 C Hybrid Alternative includes Senior Housing, so it scores one Objective higher than the other two.

C1f-29
(cont.)

C1f-30

C1f-30 The table in the comment is noted. Refer to response to comment C1f-14 regarding why the Downtown Escondido SPA is not a viable alternative.

TABLE 2 - COMPARISON TO PROJECT OBJECTIVES

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

C1f-30 (cont.)

Clearly, the least Environmental Impact *even to these biased Objectives* is the Downtown Escondido SPA Alternative.

In addition, impacts associated with the fire service time are increased due to DSFPD not being able to service the project within the County required time. DSFPD would not staff the proposed fire station as the project does not generate sufficient revenues for an additional station, nor will DSFPD relocate their station to the project which would cause a significant decrease in the service levels to their area along I-15 / Old 395.

C1f-31

Evacuation due to natural disasters such as Brush fires and has not been adequately addressed or at all. As recent as May 2014, the brush fire north of Lilac / Old 395 caused significant traffic congestion on the Lilac Bridge that crosses I-15, such that Lilac was completely blocked for several hours with access to Old 395.

C1f-31 For details on how the project, and alternatives, would comply with the travel time standards refer to the Global Response: Fire and Medical Services included in the introduction to these responses to comments. In addition, the analysis includes the Lilac Hills Ranch Fire Service Response Capabilities Assessment (Dudek & Hunt Research Corp. 2014) that shows the DSFPD would have capacity to respond to expected calls from the project. As the comment does not raise a specific issue with the analysis, a more detailed response cannot be provided.

LETTER

RESPONSE

The Proposed Mountain Ridge Road Fire Station alternatives and the Mountain Ridge Road improvements to a public road does significantly impact the view shed of the properties and residences nearby. In addition, the report does not adequately address the impacts of Traffic, **Air Quality (noted as a Net Increase and Significant and Unavoidable Impact)**, Noise and Lighting that will impact the off-site properties along Mountain Ridge Road. } C1f-32

Summary and Conclusion
The County's Project Alternatives Analysis in Chapter 4 of the Lilac Hills Ranch DEIR is grossly defective in meeting CEQA requirements. }

Objectives 1 and 6 need to be changed to eliminate the bias that the Applicant has intentionally created. } C1f-33

Additional information and studies need to be performed on the Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid Alternatives. }

The Downtown Escondido SPA Alternative accomplishes the same Objectives as the Project with orders of magnitude less Environmental Impact. This Alternative is fully informed in the City of Escondido Downtown SPA Specific Plan and related documents. } C1f-34

The Project Alternatives do not adequately address the needs for emergency response times for DSFPD. In the event of a brush or wild land fire or other natural disaster, the development may create a significant and dangerous blockage of important evacuation routes. } C1f-35

The Project Alternatives do not adequately address the impacts to the properties along Mountain Ridge Road as to the Proposed Mountain Ridge Road Fire Station alternatives and the Mountain Ridge Road improvements. } C1f-36

Reference A: Escondido Downtown Specific Plan Area
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Attachment A: DEIR Project Objective Issues letter dated July 29, 2013

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

Attachment C – 1251 EDU Reduced Footprint Map

Attachment D – 881 EDU Reduced Intensity Map

Attachment E – 1351 EDU 2.2 C Hybrid Map

C1f-32 Chapter 4.0 of the FEIR includes an evaluation of all of the subject areas mentioned by the commenter for the Mountain Ridge Road Fire Station Alternative. The purpose of the analysis is to disclose the impacts of the project and the FEIR has adequately done this for the alternative analysis.

C1f-33 This comment makes general assertions about the inadequacy of the alternative analysis and the project alternatives that are further detailed and responded to in the remainder of these responses.

C1f-34 Refer to response to comment C1f-14 regarding why the Downtown Escondido SPA is not a viable alternative.

C1f-35 Refer to the Global Response: Fire and Medical Services included in the introduction to these responses to comments. The adequacy of fire and emergency response service is evaluated in subchapter 2.7.2.4 in Chapter 2.0 of the FEIR and Appendix J and K. In addition, the analysis includes the Lilac Hills Ranch Fire Service Response Capabilities Assessment (Dudek & Hunt Research Corp. 2014) that shows the DSFPD would have capacity to respond to expected calls from the project. As the comment does not raise a specific issue with the analysis, a more detailed response cannot be provided.

C1f-36 Impacts to surrounding properties are adequately addressed in Chapter 4.0, subchapter 4.9 of the FEIR.

Valley Center Community Planning Group Comments

Chapter 4 Attachment A

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

EIR Project Objectives

The County's Project Objectives from the DEIR for the proposed Accretive Investments Lilac Hills Ranch Subdivision are

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

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

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

below:

The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, preventing analyses of alternative sites that meet San Diego County General Plan objectives and leading to a self-serving and biased environmental analysis. *(Insert CEQA and Case cites here)*

The substantiation of this assertion is provided below.

C1f-37

C1f-37 Refer to response to comment C1f-2.

LETTER

RESPONSE

<p>Objective 1 – The full text of Objective One with comment areas highlighted is below:</p> <p>“Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County’s Community Development Model for a walkable pedestrian-oriented mixed-use community.”</p> <p>Develop a community within northern San Diego County in close proximity to a major transportation corridor – The County General Plan, approved just two years ago, already accommodates more growth than SANDAG projects. There is no requirement to convert land that is designated by the Community Model for agriculture, large animal keeping and estate residential in order to accommodate an additional Village with urban densities in Northern San Diego County.</p> <p>The City of Escondido SINCE 2007 has been developing an infill redevelopment mixed use Downtown Specific Plan Area (SPA) less than 14 miles south from the proposed Lilac Hill Ranch project. The Escondido Downtown SPA has a target Equivalent Dwelling Unit increase (EDU) of from 2,000 to 5,000 EDU.</p> <p>Unlike the Accretive Project, the Escondido Project meets Smart Growth and LEED-ND location requirements, because it is an infill development with requisite infrastructure truly within walking distance of the Escondido Transit Center which has access to the Sprinter Train as well as being a hub for North County and Metropolitan Bus lines. Additionally, this location is less than a mile from access to I-15.</p> <p>The Escondido Downtown SPA also provides a more viable solution for senior living facilities, including Assisted Living, because it is within two miles from the two Palomar Hospitals and major medical facilities.</p> <p>The Escondido Downtown SPA document is available at the following link, that is also provided as Reference A. http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf</p> <p>Please also compare the Escondido Downtown SPA level of specificity and completeness of design to that of the Accretive Lilac Hills Ranch Specific Plan.</p> <p>Accretive also makes an unsubstantiated assertion that the Valley Center’s Village, designated by SANDAG as a “Smart Growth Opportunity Area” is not in close proximity to a major transportation corridor – this is patently false. Both the North and South Village nodes are traversed by Valley Center Road which was improved at a cost of \$50 Million to facilitate intensified commercial and residential development of Valley Center’s central valley. A traditional crossroads since the late 1800s when Valley Center was homesteaded, the Community Plan has designated this area for compact village development since the first community plan in the 1960s. Valley Center Road is a 4 lane road with raised medians, specifically a Circulation Element 4.1A Major Road from Woods Valley Rd south to the city of Escondido, and from Lilac Rd. to Miller Rd. The</p>	<p>C1f-37 (cont.)</p> <p>C1f-38</p> <p>C1f-39</p> <p>C1f-38 Refer to response to comment C1f-5.</p> <p>C1f-39 While Valley Center Road is a major road in the Valley Center area, it would not be considered a major transportation corridor. This term is generally reserved for major highways or corridors that offer interregional travel (e.g., I-15, I-5). The remainder of this comment provides background information that does not require a response.</p>
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LETTER

RESPONSE

<p>other segments of Valley Center Road through the North and South Villages are 4.2A Boulevard roads. This slightly lower classification reflects the traffic impacts of interconnection with North and South Village traffic flows.</p> <p>The proposed Lilac Hills Ranch Project contemplates overburdening 2.2 E and F two lane, narrow winding country roads to Level of Service E and F and requests ten Exemptions to County Road Standards for the 1 ½ to 3 miles the Project needs to connect the 25,000 plus trips for this automobile based urban sprawl project with I-15.</p> <p>Accretive does not have legal right-of-way to use Mountain Ridge and Covey Lane private roads for the purposes that Accretive proposes for the Project.</p> <p>Accretive does not own legal right of way, nor can they achieve legal right-of-way without the use of Eminent Domain, to build the proposed Covey Lane/West Lilac Road intersection in compliance with minimum County Sight Distance Line standards.</p> <p>Accretive does not have legal right of way for offsite sewer and recycled water pipelines that they indicate on their Preferred Route 3 to the Lower Moosa Water Reclamation Facility.</p> <p>For the County to state that this Project is in close proximity of a major transportation corridor without an analysis of the ability of this Project to safely manage its traffic burden and pay for the direct off-site impacts of the Project's congestive Level E and F Level of Service that the Project will directly cause is misleading at best and not in compliance with CEQA and related State and County policies and Regulations. <i>(Insert State CEQA and Subdivision Map Act issues; County Subdivision Ordinance and DPW Public and Private Road Design Standards)</i></p> <p>As is discussed below, in the new General Plan, unincorporated communities including Valley Center and Bonsall already accommodate more than their fair share of County growth. In keeping with the "Smart Growth" vision and guiding principles that are essential foundations for the entire County General Plan, growth in these communities has purposefully been re-directed to enlarged Village areas where road and sewer infrastructure is in place. Conversely, the new General Plan directs growth away from the more rural countryside.</p> <p>The new County General Plan has applied this two-part vision to ensure that Valley Center and Bonsall absorb more than a fair share of San Diego County General Plan growth -- without overdeveloping green field areas.</p> <p>The General Plan growth in housing units across the entire County of San Diego is summarized in Table 1-1 below.</p>	<p>C1f-39 (cont.)</p> <p>C1f-40</p> <p>C1f-41</p> <p>C1f-40 Refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads) included in the introduction to these responses to comments for information about the legal access rights of the project. Sewer and water easements are owned or would need to be obtained by the Valley Center Municipal Water District to construct required pipelines. The County does not agree that the project is not in compliance with CEQA and County policies and regulations. The FEIR adequately discloses project impacts.</p> <p>C1f-41 This comment provides background information about the County General Plan and expresses the opinions of the commenter. However, as this comment does not raise a specific issue with the content of the FEIR, a detailed response is not required.</p>
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Table 1-1 San Diego County General Plan Housing Unit Forecast 2010-2050

CPA	Housing Units				Percent Change			
	2010	2020	2030	2050	2010-2020	2020-2030	2030-2050	2010-50
Alpine	6,535	6,890	7,875	9,157	2.4%	17.7%	16.3%	40.1%
Barona	202	170	170	170	-15.8%	0.0%	0.0%	-15.8%
Bonsall	3,875	4,320	5,148	6,151	11.5%	19.2%	19.5%	58.7%
Central Mountain	2,182	2,305	2,589	2,735	5.6%	12.3%	5.6%	25.3%
County Islands	614	607	607	635	-1.1%	0.0%	4.6%	3.4%
Crest-Dehesa	3,562	3,677	3,926	3,978	3.2%	6.8%	1.3%	11.7%
Desert	3,546	3,453	4,337	6,923	-2.6%	25.6%	59.6%	95.2%
Fallbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jamul-Dulzura	3,234	3,372	4,398	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.8%	7.0%	17.8%
Lakeside	27,575	28,517	30,339	30,915	3.4%	6.4%	1.9%	12.1%
Mountain Empire	3,023	3,056	3,903	5,108	1.1%	27.7%	30.9%	69.0%
North County								
Metro	16,114	19,548	24,090	25,946	21.3%	23.2%	7.7%	61.0%
North Mountain	1,527	1,759	2,002	2,388	15.2%	13.8%	19.3%	56.4%
City	7	490	2,035	2,156	6900.0%	315.3%	5.9%	30700.0%
Pala-Pauma	1,980	2,285	3,037	4,399	15.4%	32.9%	44.8%	122.2%
Pendleton-De Luz	7,531	8,533	8,684	8,797	13.3%	1.8%	1.3%	16.8%
Rainbow	708	750	881	963	5.9%	17.5%	9.3%	36.0%
Ramona	12,376	12,692	14,107	15,140	2.6%	11.1%	7.3%	22.3%
San Dieguito	10,993	11,053	11,924	13,601	0.5%	7.9%	14.1%	23.7%
Spring Valley	20,533	20,939	21,837	21,952	2.0%	4.3%	0.5%	6.9%
Sweetwater	4,670	4,657	4,732	4,732	-0.3%	1.6%	0.0%	1.3%
Valle De Oro	15,543	15,646	16,022	15,968	0.7%	2.4%	-0.3%	2.7%
Valley Center	6,636	7,627	9,795	13,411	14.9%	28.4%	36.9%	102.0%
Unincorporated Area	170,606	180,431	202,882	222,890	5.8%	12.4%	9.9%	30.6%
San Diego County	1,158,076	1,262,488	1,368,807	1,528,090	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

C1f-41
(cont.)

Please note that the Lilac Hills Ranch project is a General Plan Amendment, and is not included in the estimate of projected Housing Units in Table 1-1, which is based on the August 2011 San Diego County General Plan.

For the entire County of San Diego Housing Units are increasing 32 % from 2010 to 2050.

Valley Center Housing Units as reflected in the August 2011 General Plan are growing 102% from 2010 to 2050, **more than 3 times** the rate of the County overall. This growth is largely in the North and South Villages, which are located where suitable infrastructure is (Roads, Sewers, Schools) located in Valley Center. There are no provisions in the General Plan to provide the requisite infrastructure in the remote proposed site of Lilac Hills Ranch to support urban village land use densities. The two central Villages in the San Diego County General Plan and the Valley Center

LETTER

RESPONSE

Community Plan located in the traditional town center is the logical place for Valley Center to provide more than its fair share of housing for the County.

C1f-41
(cont.)

Bonsall Housing Units as reflected in the August 2011 General Plan are growing 59% from 2010 to 2050, **nearly 2 times** the rate of the County overall. Growth is also planned at the traditional town center, close to the intersection of SR-76 and Mission Road, where necessary infrastructure for dense, urban development is in either on the ground or planned (and funded) to be added shortly.

C1f-42

C1f-42 This comment provides background information but does not raise a specific issue with the content of the FEIR, a detailed response is not required.

The combined composite effects of adding Lilac Hills Ranch in addition to General Plan growth is provided in Table 1-2 below:

Table 1-2 Bonsall and Valley Center Composite Housing Unit Analysis

	Housing Units				% Growth from 2010		
	2010	2020	2030	2050	2010 to 2020	2020 to 2030	2010 to 2050
Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%	58.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	102.0%
Subtotal General Plan	10,513	11,947	14,944	19,562	13.6%	25.1%	86.1%
Lilac Hills Ranch (LHR)		746	1,746	1,746			
Total with LHR included	10,513	12,693	16,690	21,308	20.7%	31.5%	102.7%
Reference: SD County growth	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	32.0%

C1f-43

C1f-43 This comment provides background information about the County General Plan and expresses the opinions of the commenter. However, as this comment does not raise a specific issue with the content of the FEIR, a detailed response is not required.

Accretive states that the Project is "in close proximity" to the I-15 freeway. Reality is that the granite hills require a twisting, slow 1 ½ mile trip to I-15 south and 3 miles north to I-15 North, from the closest northern point of their development.

C1f-44

C1f-44 As indicated in the FEIR, the County considers the 1.5- to 3-mile trip to the I-15 a short trip to major transportation infrastructure.

From the south at Circle R Drive it is 3.0 miles of the lowest grade of public road in the County to reach I-15 at Gopher Canyon.

The proposed Lilac Hills Ranch Subdivision is a classic urban sprawl development. All of the transportation will be via automobiles, and the road infrastructure does not support the 9 fold increase in traffic.

C1f-45

C1f-45 The County does not agree with this general statement. This comment expresses the opinions of the commenter and will be considered by decision makers.

The ONLY mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389 (Attachment A). The closest access is at SR 76 and Old Highway 395, a minimum 4 mile trip north from the project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido

C1f-46

C1f-46 This comment provides background information about the existing transit services in the area. The FEIR further explains that the project would provide for park-and-ride facilities and would coordinate with the NCTD to provide for future bus service to the project site. As the comment does not raise a specific issue with the content of the FEIR, a detailed response is not required.

<p>Transit Center. If you are going to a regional shopping center or work center, you must take a 30 minute bus ride to the Escondido Transit Center and transfer to another route. The mass transit system only works if you are a Casino patron.</p>		
<p>consistent with the County's Community Development Model – This Project is not consistent with the San Diego County Community Development Model. It is Inconsistent with the Community Development Model which a subset of the San Diego General Plan. Why does the first Objective ignore the balance of the General Plan? Because the Proposed Project is patently inconsistent with the San Diego General Plan, as well as the Community Development Model within the General Plan.</p>	<p>C1f-46 (cont.)</p>	
<p>The General Plan states (San Diego County General Plan: Land Use Framework; Community Development Model, p.3-6): <i>"The Community Development Model directs the highest intensities and greatest mix of new uses to Village areas, while directing lower-intensity uses such as estate-style residential lots and agricultural and agricultural operations to Semi-Rural areas To facilitate a regional perspective the Regional Categories of Village, Semi-Rural and Rural Lands have been applied to all privately-owned lands ..."</i></p>	<p>C1f-47</p>	<p>C1f-47 Chapter 3.0, subchapter 3.1.4, Land Use Planning of the FEIR and Appendix W provide information demonstrating how the project would comply with the General Plan. As discussed in the FEIR, the project is consistent with the County's Community Development Model. Refer also to the Global Response: Project Consistency with General Plan Policy LU-1.2 for additional detail on compliance with the County's Community Development Model.</p>
<p>First, as the above statement in the County General Plan makes clear, the Community Development Model is not a moveable abstract concept. If this were true then Village "puzzle pieces" could be dropped into Semi-Rural and Rural lands anywhere in the County and pronounced consistent with the Community Development Model.</p>		
<p>Rather, the Community Development Model reflects a complex of planning principles and ideas that are expressed through the General Plan's Regional Categories. It is the assignment of a particular Regional Land Use Category to a particular piece of land that this SP/GPA proposes to amend. The proposal therefore is inconsistent with the Community Development Model. Again, consistency would be achieved only by amending the General Plan to fit the project.</p>		<p>C1f-48 This comment restates information from the FEIR.</p>
<ul style="list-style-type: none"> In the General Plan (p 3-7) <i>"Village areas function as the center of community planning areas and contain the highest population and development densities. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit."</i> 	<p>C1f-48</p>	<p>C1f-49 Property owners may request a General Plan Amendment pursuant to Government Code Sections 65300 et seq. Prior to the sunset of Board of Supervisors Policy I-63, in order to initiate an amendment to the General Plan, an applicant was required to process a Plan Amendment Authorization (PAA). An application to amend to the General Plan was allowed to proceed by the approval of a PAA by the Planning Commission on December 17, 2010. The County does not agree that the Community Development model requires amendment because the project can demonstrate compliance with the model.</p>
<ul style="list-style-type: none"> The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This proposal to plop a Village into the middle of an area that the Community Development Model designates for Semi-Rural and Rural development requires AMENDING the Community Development Model. 	<p>C1f-49</p>	
<ul style="list-style-type: none"> Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model, which has been applied in Valley Center's central valley and 	<p>C1f-50</p>	<p>C1f-50 Overall, the residential-oriented Neighborhoods will radiate out from the Town Center to the project perimeter with the largest, ranchette-styled lots feathering the edges. This design conforms to the Community Development Model.</p>

LETTER

RESPONSE

<p>which this proposal defies, requires a "feathering" of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth.</p> <ul style="list-style-type: none"> • This SP/GPA is located many miles from areas that the Community Development Model designates for Village development: miles from employment centers, shopping, entertainment, medical services, and civic organizations and activities. • As for infrastructure, there are few existing roads in the area and they are built and planned to service Semi-Rural and Rural development, as is the current plan. Despite proposing intense Village development, the proponents also propose to retain or reduce capacities of these roads. Water infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service. • The intent of the Community Development Model for Villages is to intensify development in existing Villages -- not to create NEW Villages through the destruction of Semi-Rural and Rural lands. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed use core to meet the Semi-Rural designations. The majority of the Valley Center community's future development is now planned for the "Village" areas in the center of the Valley Center Planning Area, at the community's traditional "crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place. <p>a walkable pedestrian-oriented mixed-use community. There are two issues with this part of Objective 1. The first issue is that the Specific Plan is so NON-SPECIFIC on what the Commercial, Schools, and Parks content of this Project is that one cannot assess whether anyone walking would reach a desired service of any kind.</p> <p>The second issue is that "walkability" is usually defined a ½ mile one way trip. The large majority of the Commercial zoning is in the Northern town center, which is a 1 ½ mile one way trip from the Southern boundary of the Project. People in the South (1 ½ mile) and Middle (1 mile) of this project won't walk to the town center, and the two small commercial areas planted in the Middle and South to create a façade of "a walkable pedestrian community" are not credible walkable destinations. In fact, this creates Urban Sprawl internal to the Lilac Hills Ranch Subdivision.</p> <p><u>Summary and Conclusion – Objective One</u> The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.</p> <p><i>(CEQA and Case cites that back the conclusion statement)</i></p>	<p>C1f-50 (cont.)</p> <p>C1f-51</p> <p>C1f-52</p> <p>C1f-53</p> <p>C1f-54</p> <p>C1f-55</p> <p>C1f-51 Refer to response to comment C1f-49.</p> <p>C1f-52 This comment describes the existing condition and does not address what is proposed by the project. Adequate services would be provided concurrent with development, as detailed in the FEIR and Specific Plan.</p> <p>C1f-53 General Plan Policy LU-1.2 allows for new villages. For additional detail on compliance with this policy, refer to Global Response: Project Consistency with General Plan Policy LU-1.2 included in the introduction to these responses to comments.</p> <p>C1f-54 Chapter 1.0 of the FEIR, Table 1-1 provides a land use summary of the proposed project that clearly describes the square footage of various proposed land uses. The project description clearly defines a 12-acre public school site, 90,000 square feet of commercial and mixed-use, and over 25 acres of public and private parks. Figure 1-4 of the FEIR provides the Specific Plan Map that shows the location of the various land uses proposed. The project was designed to create a walkable community through its walkable streets, compact development, connected and open community, mixed-use neighborhood centers, traffic calming measures; provision for a mass transit bus stop and a regionally coordinated Transit Demand Management program; close access to civic and public spaces and to recreational facilities; promotion of local food production; tree-lined streets, parks, and trails; and a neighborhood school that is walkable and bikable by students because of traffic calming measures.</p> <p>C1f-55 The County does not agree that the first objective is biased.</p>
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LETTER

RESPONSE

<p>Objective 2 – The full text with comment areas highlighted is below:</p> <p>“Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.”</p> <p>in a manner that encourages walking and riding bikes - With 10 Exceptions to Road Standards, the Covey Lane/West Lilac intersection, and the traffic load the Project will throw on internal and external roads, who is gonna risk taking a walk or riding a bike?</p> <p>public services and facilities that are accessible to residents of both the community and the surrounding area – There are two issues with this statement.</p> <p>The first issue: what are the public services and facilities in this Project? A vague statement about a K-8 school site without any commitment to financing or endorsement by the School District, a vague description of the minimum acreage of Parks the County requires? Does the undefined Commercial content include a Supermarket or community market? A restaurant of any kind? A retail gasoline service station?</p> <p>The second issue: “accessible to residents of both the community and the surrounding area” – Accretive’s Traffic Impact Study does not show an influx of non-residents to the area. Is this because the Applicant is overly optimistically portraying the true Traffic Impact of this Project?</p> <p><u>Summary and Conclusion – Objective Two</u> The project does not meet its own Objective for Objective Two.</p> <p>Objective 3 – The full text is below:</p> <p>“Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.”</p> <p>We do not have any issues with this Objective other than to state that any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.</p> <p>Objective 4 - The full text with comment areas highlighted is below: “Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.”</p>	<p>C1f-56 C1f-56 Refer to response to comment C1f-6.</p> <p>C1f-57 C1f-57 Refer to response to comment C1f-7.</p> <p>C1f-58 C1f-58 Refer to response to comment C1f-8.</p> <p>C1f-59 C1f-59 The County does not agree with this conclusory statement.</p> <p>C1f-60 C1f-60 This comment is noted; however, most projects with a discretionary application do not provide recreational opportunities as part of the project.</p> <p>C1f-61 C1f-61 This comment restates information from the FEIR and does not require a response.</p>
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LETTER

RESPONSE

<p>There are three issues with this Objective. The first issue is that the Objective is so vague and subjective that compliance is not measurable.</p> <p>The second issue is with the highlighted statement: "Integrate major physical features into the project design, including major drainages, and woodlands"</p> <p>How is taking 608 acres of Rural Land primarily involved in Agriculture, disturbing 440 acres, and creating large areas of impermeable surfaces consistent with this Objective? The Project includes 83 acres of road surface and 68 acres of manufactured slopes. Is it desirable to increase storm water runoff surface water velocity in concrete channels that increase siltation in the runoff? How does this benefit the woodlands?</p> <p>The third issue is with the highlighted statement that follows: "creating a hydrologically sensitive community in order to reduce urban runoff."</p> <p>From our analysis of the Accretive Hydromodification Design, we find the analysis is marginal; requiring rainwater collection and storage from rooftops and a total of 23 acres of permeable paving to meet Hydrology requirements with the indicated preliminary design. The truth of the matter is that Accretive is proposing covering large areas of rural farm land with impermeable surfaces. If the Hydro design is compliant, it achieves compliance only in the most optimistic scenarios with scant margin. Is this what a hydrologically sensitive community is?</p> <p><u>Summary and Conclusion – Objective Four</u> The project does not meet its own Objective for Objective Four</p> <p>Objective 5 – The full text is below:</p> <p>"Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area." We do not have any issues with this Objective other than to state that any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.</p> <p>Objective 6 – The full text with comment areas highlighted is below: "Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing." The mixed-use and senior housing are included in the Project to achieve the densest possible development yield. The applicant has added a 200 bed congregate care facility on top of the 1746 Equivalent Dwelling Units, stating that because there is only one communal kitchen, the huge facility technically doesn't add EDU's.</p> <p>In this Objective, the County re-brands dense Urban Sprawl as a desired attribute. The General Plan Alternate does not meet this objective, because it does not have Urban Densities.</p>		<p>C1f-62 C1f-62 The County does not agree that the objective is too vague to be measurable. Refer to response to comment C1f-10.</p> <p>C1f-63 C1f-63 Refer to response to comment C1f-10.</p> <p>C1f-64 C1f-64 Refer to response to comment C1f-10.</p> <p>C1f-65 C1f-65 The County does not agree that the project does not meet Objective 4. Refer to response to comment C1f-10.</p> <p>C1f-66 C1f-66 This comment is noted.</p> <p>C1f-67 C1f-67 The project correctly accounts for dwelling units per County Zoning Ordinance definitions of a dwelling. This comment states opinion that do not require further response.</p>
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LETTER

RESPONSE

<p>This Objective is another example of where the County has structured the Objectives of the EIR so narrowly with an planned bias that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.</p> <p>Objective 7 – The full text is below:</p> <p>“Provide the opportunity for residents to increase the recycling of waste.”</p> <p>We do not have any issues with this Objective other than to state that having an on-site recycling facility is not the only opportunity to increase recycling of waste; with the huge amounts of waste the Accretive Urban Sprawl (AUS) creates one is necessary to marginally comply with Traffic Standards on trash day.</p> <p>All of the Alternatives comply with this Objective equally</p> <p>Objective 8 – The full text is below:</p> <p>“Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.”</p> <p>Developing the Project at General Plan densities and preserving agriculture and residential based businesses (such as the existing Accretive Agricultural Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this Objective perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.</p> <p><u>Summary</u></p> <p>The County has structured the Objectives of the EIR in aggregate so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. <i>(re- insert CEQA and Case cites here)</i></p> <p>Sincerely,</p>	<p>C1f-67 (cont.)</p> <p>C1f-68</p> <p>C1f-69</p> <p>C1f-70</p> <p>C1f-68 This comment is noted.</p> <p>C1f-69 This comment expresses opinions of the commenter and a detailed response is not required.</p> <p>C1f-70 This is a conclusory comment. Further response is not required as the comments are addressed in the remainder of the letter.</p>
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LETTER

RESPONSE

(Your Name)
(Your Street Address)
(Your City, State, and Zip)

Reference A: Escondido Downtown Specific Plan Area
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Attachment A: North County Transit District Breeze Bus Routes 388 and 389

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

TABLE 4-1
LILAC HILLS RANCH CEQA ALTERNATIVES

Project Land Use	Alternative													
	Project		1 No Project - No Development		2 Existing Legal Lots		3 GPU Consistency		4 Reduced Footprint		5 Reduced Intensity		6 2.2C (Hybrid)	
	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.
Single-family Detached	158.8	903	608	16	608.8	49	351.4	110	142.1	783	275.5	881	177	792
Single-family Senior	75.9	468	0	0	0	0	0	0	71.1	468	0	0	75.9	468
Single-family Attached	7.9	184	0	0	0	0	0	0	0	0	0	0	4.3	105
Commercial/Mixed-use	15.3	211	0	0	0	0	0	0	6	0	5.8	0	15.3	0
Water Reclamation	2.4	0	0	0	0	0	0	0	2.4	0	2.4	0	2.4	0
RF/Trailhead	0.6	0	0	0	0	0	0	0	4	0	0.6	0	0.6	0
Detention Basin	9.4	0	0	0	0	0	0	0	5.4	0	5.5	0	5.5	0
School Site	12.0	0	0	0	0	0	0	0	8	0	0	0	12	0
Private Recreation	2.0	0	0	0	0	0	0	0	0	0	0	0	2	0
Group Residential/Care	6.5	0	0	0	0	0	0	0	0	0	0	0	6.5	0
Institutional	10.7	0	0	0	0	0	0	0	10.7	0	10.7	0	10.7	0
Park - HOA	11.8	0	0	0	0	0	0	0	10	0	3.0	0	11.8	0
Park - Dedicated to County	12.0	0	0	0	0	0	0	0	6	0	9.0	0	12	0
Biological Open Space	103.6	0	0	0	0	0	266.8	0	168.8	0	102.7	0	103.6	0
Non-circulating Road	45.70	0	0	0	0	0	0	0	45.7	0	41.5	0	43.1	0
Circulating Road	37.5	0	0	0	0	0	0	0	37.8	0	21.5	0	30	0
Common Areas/Agriculture	20.2	0	0	0	0	0	0	0	20.2	0	65.0	0	45	0
Manufactured Slopes	67.5	0	0	0	0	0	0	0	67.5	0	65.0	0	50	0
TOTAL	608.0	1,746	608	16	608.0	49	608.0	110	608	1251	608	881	608	1365

sq. ft. = square feet
HOA =homeowners association

Attachment C – 1251 EDU Reduced Footprint Map

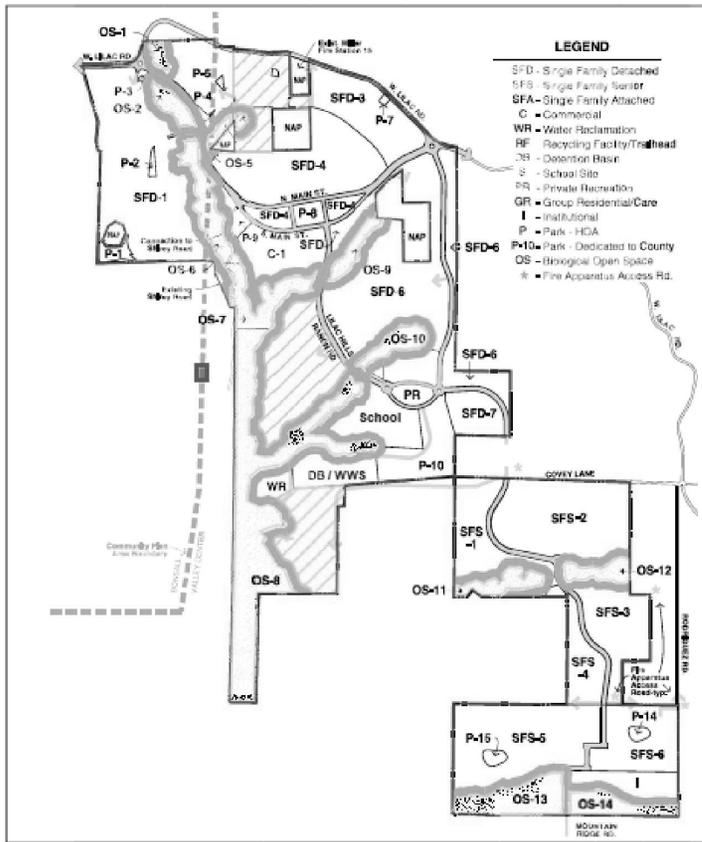
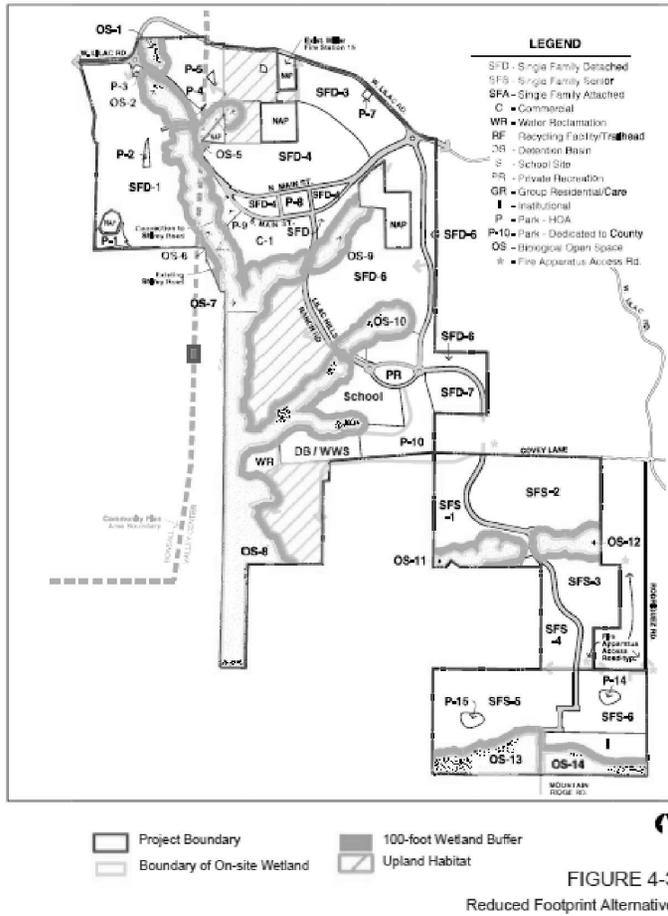


FIGURE 4-3
Reduced Footprint Alternative

Attachment D – 881 EDU Reduced Intensity Map



Attachment E – 1351 EDU 2.2 C Hybrid Map

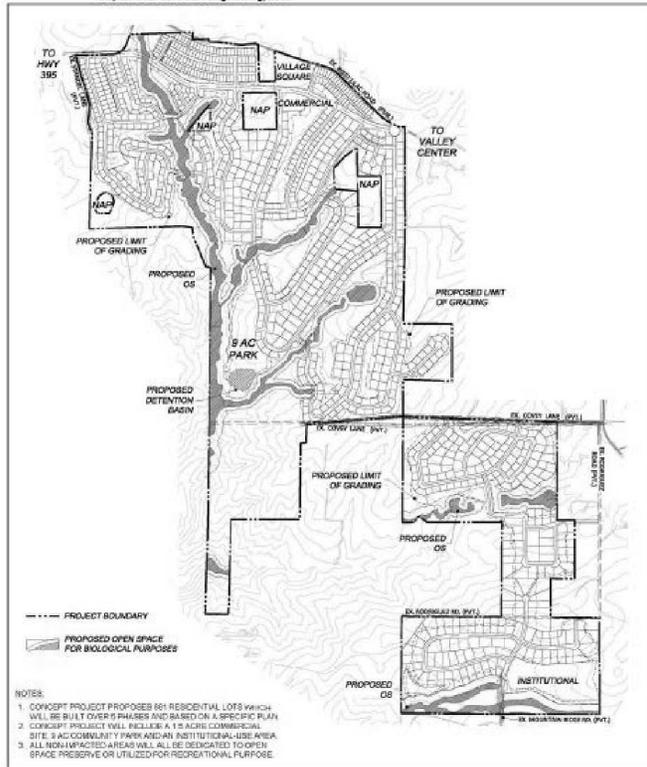


FIGURE 4-4
Reduced Intensity Alternative