

Letter C1g

Specific Plan Comments 1

DEIR Public Comment on 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

Lilac Hills Ranch Specific Plan

Introduction

This set of comments is the fifth prepared for the Lilac Hills Ranch Specific Plan in little over two years. Typically, that would mean that there has been a healthy exchange of ideas and concerns between the community and the Project applicant over the course of that time. And, such an exchange would result in a project that more closely resembles what the community says it wants in the General Plan and Valley Center Community Plan. However that is not the case. Instead, the applicant has chosen to be insulated from the public forums established by the Valley Center Community Planning Group, choosing to select supporters to attend private, invitation-only promotional meetings, and calling them public. This has resulted in a Project that is at odds with the vision for the community expressed by the community in the San Diego County General Plan and Valley Center Community Plan.

According to the "Community Design and Operation Goals" (p.II-2) of the Specific Plan, this project intends to

"Ensure the orderly and sensitive development of land uses within Lilac Hills Ranch Specific Plan to safeguard and enhance the appearance, quality, and value of development in the Valley Center and Bonsall Community Planning Areas."

The language is lofty and seemingly respectful of the community that surrounds the project. However the actions outlined contradict the lofty speech—a style that abounds throughout the text. Rather than respect the productive agriculture of the area, or the remaining natural habitat of the area, or the community's vision for the area, the applicant is focused on land uses and development that degrade them. They have chosen to ignore the County's General Plan for the area and the specific Valley Center and Bonsall Community Plans that purportedly govern land use and development in the area.

This flagrant disregard for the General Plan and the community plans comes only three years after the 12-year, nearly \$20 million effort to implement them. Have conditions in north San Diego County have changed so much in three years that major changes could conceivably be warranted? We would argue that nothing substantial has changed since the General Plan and community plans were adopted.



C1g-1

C1g-2

C1g-3

C1g-1 The comment expresses the opinions of the commentator. 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, no further response is required.

C1g-2 The comment expresses the opinions of the commentator. 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, no further response is required.

C1g-3 The comment expresses the opinions of the commentator. 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, no further response is required. With respect to concerns regarding the exceptions being requested for the roadway improvements, these exceptions 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 decision making body will decide whether to grant all or some of the exception requests as part of the approval process.

This plan—to create a major leapfrog development in San Diego County--would bring major and devastating change and remove many protections put in place by the General Plan. If approved, the project would set a precedent that would reverberate throughout the unincorporated countryside of the County. The precedents set would allow developers almost unlimited license.

Questions: Will the County grant the developer the extensive exceptions to the General Plan that it requests? How will land use in San Diego County be governed in the years ahead if most limits on density, leapfrog development, the integrity of private roads—to name but a few issues—are not applied?

In the section of the Specific Plan titled, "Community Design and Operation Policies," (p. II-2) the applicant continues to feign respect for the General Plan while planning to undermine it.

"Limit development to those uses permitted by and in accordance with development standards contained in the County of San Diego Zoning Ordinance, the County General Plan, the Lilac Hills Ranch Specific Plan and future detailed approvals and permits for the property. The Lilac Hills Ranch Specific Plan is intended to further implement the policies and development standards set forth in the County General Plan, and the Valley Center and Bonsall Community Plans provided however, in cases where there are discrepancies or conflicts between the Lilac Hills Ranch Specific Plan and the County's development regulations or zoning standards, the provisions of the Lilac Hills Ranch Specific Plan shall prevail."

This comment continues the developer's use of Orwellian language. It promises development in accordance with the standards of the San Diego County Zoning Ordinance and the County General Plan. **However, the development will be in conformity with county documents and standards only AFTER Accretive has significantly altered them to fit their own Specific Plan and its urban - rather than rural - standards.** Their plan will usurp the authority of the General Plan and Zoning ordinance and allow their Specific Plan to supersede them. Most property owners in the County would like to be able to supersede the General and Community Plans from time to time, but, instead the entire unincorporated area of San Diego County came together and agreed to update the General Plan in a way that applies to everyone equally - or so we thought.

Questions: What rationale would be used to allow the developer to amend the 2011 General Plan so extensively that this Specific Plan would, in many areas, become the new standard? What public process, comparable to that involved in the creation of the General Plan, would support such a change?

Under "Specific Plan Goals," (p.II-3) the applicant states the desire to:

"Create a mixed-use pedestrian oriented sustainable Community for an area on the outer boundaries of the Bonsall and Valley Center community planning areas. This new Village will augment the several other large scale projects adjacent to this section of I-15 between Escondido and Fallbrook by introducing new mixed-use pedestrian oriented land uses with a

C1g-3
(cont.)

C1g-4

C1g-5

C1g-4 Subchapter 3.1.4.2 clearly states that the project proposes land uses and densities that are not currently consistent with the adopted land use designation of Semi-Rural S-R4 (Valley Center Community Plan (VCCP) Land Use Map) and Semi-Rural SR-10 (Bonsall Community Plan (BCP) Land Use Map).

In order for the project to be approved and implemented, a General Plan Amendment would need to be approved by the Board of Supervisors, and the General Plan Regional Land Use Map would need to be amended to change the adopted regional category (Semi-Rural) designation of the project site and to redesignate the entire 608-acre site as a "Village" regional center (as shown in Figure 1-1 of the FEIR). In addition, the VCCP land use designation for the project would need to be amended to Village Residential (VR 2.9) and Village Core (C-5) and the BCP land use designation would need to be amended to Village Residential (VR 2.9) (as shown in Figure 1-2). Amending the General Plan Mobility Element road classification of West Lilac Road is addressed in subchapter 1.6 of the FEIR (See also subchapter 2.3, Traffic with respect to West Lilac Road and Road 3). Please also refer to Appendix W.

If the project were approved, the Specific Plan would also be adopted and would serve as the document which provides development standards, similar to zoning standards, which would govern the design of the project. With respect to the "supersede" language in the Specific Plan, many specific plans commonly include such a statement like this one. Specific plans are used to apply development standards to a specific project and therefore there are instances in which the provisions of the specific plan should prevail because of the specificity of such plans to project conditions. However, none of the "development standards" referred to in this particular provision include the standards in the General Plan or Community Plans.

C1g-5 The fact that the currently written VCCP identified only two existing rural villages where urban levels of development are permitted and the BCP recognized only three areas with the Village Regional Category, does not preclude the addition of a new village that meets the requirements of the General Plan Policy LU-1.2. The project proposes to modify the text

variety of housing types and create employment, retail and service opportunities that are not currently present."

The words "mixed-use, pedestrian-oriented, and sustainable" are charming until the realization sets in that 'mixed-use' means urban densities where rural ones exist; that 'pedestrian-oriented' makes little sense given the vertical curves, elevation changes and distances within the Project; and that 'sustainable' was added because it pleases planners not because the 5000+ residents of the Project will be able to find well-paying jobs or adequate recreational or educational opportunities for their children within the Project.

This Project straddles Bonsall and Valley Center planning area boundaries. Both Bonsall and Valley Center are identified in the General Plan as established rural communities with large lot zoning and agricultural uses that support their rural designation. Adding this urban Project is an attempt to encroach on agricultural lands that have low-density land use designations. Such encroachment will result in growth inducement as well as in undermining the planned town centers for both communities. Housing, retail employment, and service opportunities are not currently present within the Project area because General Plan already accounts for those things in the town centers of Bonsall and Valley Center.

Questions: How can the Specific Plan available for public inspection be allowed to so mischaracterize the project as "pedestrian oriented" "sustainable" or as a project that will create "employment, retail and service opportunities" when it is none of these things? Many comments directed at earlier versions of the Specific Plan have pointed out these mischaracterizations but they appear version after version without correction. Why would a city the size of Del Mar, but one with virtually no services, be constructed in two of San Diego's most rural communities?

Finally, "Specific Plan Goals" (p. II-3) summarizes:

"Overall, the specific plan seeks to balance population and housing needs with open space, agricultural land use, and the development of infrastructure for the Community."

Housing needs and population are already in balance in Valley Center. The General Plan accounted for projected population growth and housing needs over the next 20 years within both Bonsall and Valley Center **without** this project. There is no additional housing need to be met. This Project will essentially destroy or disrupt 608-acres of open space and agricultural land. According to the General Plan Principles, such trade-offs between development and agriculture/open space is to be avoided.

Questions: Does the county recognize that Valley Center has more than met its share of planned housing growth without the construction of these 1,746 homes? In what way does the project contribute to Accretive's goals of "open

C1g-5 (cont.)

C1g-6

C1g-5 (cont.)

of both community plans by respectively adding Lilac Hills Ranch as an additional rural village and as an additional Village Regional Category area.

Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

As described in Chapter 1.0 of the FEIR, the project would include a mixed-use pedestrian-oriented town center with 80,000 square feet of commercial space. The Town Center is designed to feature specialty retail stores as dictated by the Specific Plan Design Guidelines and as required by the Specific Plan, the Town Center would be centered along a main street with individual merchant store fronts contributing to the pedestrian orientation. Moreover, the project has been designed as a walkable village and pedestrian prioritized community. The centrally located Town Center and Neighborhood Centers would be located within a half-mile radius (10-minute walk) of the residential areas. Primary streetscapes would be designed to be pedestrian-orientated and provide tree-shaded walkways, pedestrian scaled lighting, and shortened crossing distances or enhanced crosswalks. The project includes numerous trails, community pathways, bike lanes, and similar facilities throughout the project site (see FEIR Figure 1-8). As detailed in FEIR subchapter 3.1.4, the project's planning and design applies sustainable development principles. See also Global Response: Project Consistency with General Plan Policy LU-1.2.

The project was analyzed pursuant to the County's LARA Model and was determined to be a significant agricultural resource but with Mitigation measure M-AG-1, the project would result a less than significant level of impact. (See subchapter 2.4.6 of the FEIR.)

The project is located 10-12 miles away from the town centers of Valley Center and Bonsall. The project will have little impact on either town as is documented by the number of trips that will be added to roads.

LETTER

RESPONSE

space, agricultural land use” and “infrastructure”? Is it not the case that it reduces open space and agriculture while having a negligible or even negative impact on infrastructure?

Once again, we have listed our concerns below, as we have listed them four times before. Our hope is that these concerns will be addressed in a way that is consistent with the Valley Center Community Plan and the County’s current General Plan. We emphasize that these present concerns should be understood to include the previously submitted concerns of July 9, 2012, October 22, 2012, March 11, 2013, and August 2013 where they still apply.

Question: Does the County recognize that there are not one or two problems with the project but rather there are at least a dozen? Some of the problems cannot be remedied (its location, its size, its impact on agriculture and on the rural nature of the community and its conformity to the general plan) or remedied only with very costly and difficult actions (its roads, its access to right of way, its fire prevention and emergency services, its school, and its waste removal, to name a few)?

Major Concerns

1. The Lilac Hills Ranch Project is too large and too dense for Valley Center and it is improperly located- Placing 1,746 homes and 5,000+ people on 608 acres with densities as high as 20+ dwelling units [DU] per acre is simply incompatible with the rural, agricultural location in which the project has been sited. The addition to the project of a 50-room hotel and a residential care (or assisted living) facility for an unspecified number of senior citizens further enhances the urban nature of the project.

Question: Are there no locations in other urbanized communities like Escondido or San Diego where such an enormous urban project could more appropriately be located?

2. Roads and Traffic- The nature of the roads that must carry traffic generated by Lilac Hills Ranch is one of the most fraught and difficult topics associated with this Project. The area has been able to move cars across winding, two lane roads that pass through hilly landscape only because of its present low, rural density. With the addition of 1,746 homes, extensive new road construction plus considerable widening and straightening of existing roads will be required to safely and efficiently handle the additional 5,000+ individuals who will populate the development. The County’s very limited road construction budget is already over-taxed, and unlikely to provide for the huge influx of automobiles created by the project. Questions of the cost of off-site road construction, evacuation needs, and acquisition of rights-of-way over existing private roads by the applicant, are also extremely challenging.

C1g-6 (cont.)

C1g-7

C1g-8

C1g-9

C1g-10

C1g-5 (cont.)

With respect to growth inducement, subchapter 1.8 addresses this issue. The project was determined to be growth inducing due to the intensification of land uses on-site, which could encourage intensification in the immediate project vicinity, and with the extension of fire and water and sewer facilities. (subchapter 1.8.5 of the FEIR.)

C1g-6

General Plan Policy LU-1.2 permits new villages that are consistent with the Community development model and meet the requirements set forth therein. Therefore, the language in the General Plan allows for future amendments to the Land Use Map and Regional Categories Map. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on related topics.

C1g-7

This is an introductory comment. See individual comments addressed below.

C1g-8

The comment expresses the opinions of the commentator only. 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 a specific environmental issue, no further response is required.

C1g-9

Please refer to FEIR Chapter 4.0, Project Alternatives for a full discussion of the alternative locations to the project site that were considered. Please refer to response to comment C1f-14 regarding the specific reasons for rejecting the Valley Center Villages and Escondido as alternative locations for the project site.

C1g-10

All road improvements or TIF fees associated with the mitigation measures for direct and cumulative impacts disclosed in FEIR subchapter 2.3 would be the responsibility of the applicant. For detailed responses relating to the project’s evacuation needs, please refer to responses to comments in letters C1o and I51i.

With respect to acquisition of rights over existing properties, please refer to the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, which describes all off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties.

Specific Plan Comments 5

The addition of the assisted living facility adds another dimension to road issues. There will be frequent need for emergency vehicles to get into and out of the development. Their ability to do so may be a matter of life and death. A weak and congested road structure cannot handle the needs of emergency vehicles in addition to the demands of commuters who will live in the project and must transport children to school and commute to work. This combination of needs for road usage will intensify response and rescue problems.

C1g-11

C1g-11 The traffic study shows that the roadways within the project site and surrounding the project site operate at adequate levels of service. Therefore, it is concluded that emergency vehicles will be able to access the assisted living facility within an adequate response time.

An additional major issue adds a potentially devastating impact to securing traffic flow for this project: The specter of eminent domain or the involuntary taking of private property. Accretive/Lilac Hills Ranch does not have legal right of way to many of the roads that they talk about improving and, in fact, must improve to facilitate the large amount of traffic the project generates. From the first iteration of the Specific Plan to this one, Accretive has made little progress in acquiring right of way.

C1g-12

C1g-12 The FEIR adequately analyzes the potential environmental impacts associated with construction of the off-site physical improvements as required under CEQA. With respect to related property rights, please see the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties. Please also see Global Response: Easements (Covey Lane and Mountain Ridge Roads) for additional information responsive to this comment.

Questions: Does the project intend to rely on eminent domain to obtain the rights of way they must have in order to build the project? Does the county intend to permit eminent domain to be used in this way to benefit a private developer? Will eminent domain be used to secure right of way on all of the roads that Accretive must have in order to build the development? Is it acceptable to the county for 20 to 50 property owners to lose portions of their property in separate takings—all of which will be fought and objected to by those owners? Will the county disclose information about legal rights to roads required for off-site improvements and information about how the applicant intends to get these legal rights? If so, when will they disclose this information?

3. Compliance with the General Plan- The Accretive/Lilac Hills Ranch Project's Specific Plan will overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, nearly \$20 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will impose damaging changes to the General Plan and the Valley Center and Bonsall Community Plans. These changes will be growth inducing, particularly in the western portion of Valley Center.

C1g-13

C1g-13 The project is consistent with the principles and policies of the County General Plan. See also response to comment C1g-5, above, and Global Responses: General Plan Consistency Analysis and Project Consistency with General Plan Policy LU-1.2.

Questions: If the Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. Would the General Plan minus the policies allowed under the Accretive/Lilac Hills Ranch SPA become the new General Plan? Is the General Plan anything more than a placeholder until the next developer proposes another drastic change? If a General Plan Amendment of this magnitude is allowed to proceed, what would a project need to propose to be rejected?

LETTER

RESPONSE

4. Services and Infrastructure - Water, Schools, Fire, and Waste Treatment-
 Infrastructure is expensive. Putting in new roads, adding additional lanes to a bridge, building a fire station, putting up a new school, installing sewer and waste treatment plants and building trails all cost large amounts of money. A principal reason why the General Plan Update strongly favors “compact, town center developments” while stating that it intends to limit “growth in areas without adequate roads, water and sewer service” is because of the demands on the public purse for building and then maintaining these infrastructure items over and over.

This project is seeking to build a city the size of Del Mar, CA that will require an almost entirely new infrastructure—new roads, schools, sewer systems, fire stations and a broad range of other infrastructure items. These infrastructure expansions are why the Valley Center Community Plan designates the north and south villages at the core of Valley Center for such housing and commercial densities. The Community Development Model also directs that kind of concentration of density and infrastructure be located not at the outer edge of the Valley Center community as this Project proposes, but at the Valley Center core.

Circulation. The issue with circulation was commented on above. Creation of adequate roads and widening of the bridge across 395 (which would surely be required) seems like a massive and extremely costly project, complicated by the lack of clear title to areas where roads would be built or widened.

Elementary School and other educational services. A school, even an elementary school, in the project seems vaguely described and fraught with difficulty. With both Valley Center and Bonsall encountering declining enrollments neither school district is willing to open and run an additional school. The 2014 Specific Plan indicates that students living in homes built in phase 1 and 2 homes would attend the Bonsall schools because these homes are located in the Bonsall School District. No mention is made of the difficult roads between the project and Bonsall but presumably parents would transport children over these roads daily and bring them home after school. A site suitable for a K-8 school will be included in the development’s plans and the developer asserts that once it is built (in time for the project’s phase 2, 3, 4) students will attend the on-site school. No mention is made of high school students who would logically attend Valley Center High School. Again, the trip from the site of Accretive’s Lilac Hills Ranch project to the Valley Center High School is a difficult one. There is also no clear definition of who will manage the school Accretive may build and how staffing will be paid for. For a project that has been in development as long as this one has, the level of detail is unacceptably low and does not allow reviewers to adequately understand how education will be provided for children living in the project.

Fire. When discussing Fire Protection, the developer notes that “structural and wild land fire protection is provided by the Deer Springs Fire Protection District” in

C1g-14

C1g-15

C1g-16

C1g-17

C1g-14 The project would provide all necessary public infrastructure, including water, sewer, fire and possibly a school. The project is located in the County Water Authority and the Valley Center Municipal Water District (VCMWD), which has agreed to provide service as long as the project applicant fulfills specific conditions. Further, the residents of the proposed project would pay for maintenance of the streets and public park.

Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C1g-15 See response to comment C1g-10.

C1g-16 The project TIS addresses traffic associated with the proposed elementary school. For details relating to the calculations of student generation and trip rate, please refer to responses to comments I51d-6-38.

C1g-17 Please refer to Global Response: Fire and Medical Services.

Specific Plan Comments 7

association with CALFIRE. However, legally required fire response times cannot be met without the addition of a new fire station (or the substantial expansion of a small but existing one) much closer to the project. The Fire District has indicated that they cannot move to a new location closer to the project without adversely affecting the area that they currently serve and that they do not have the resources to operate an additional fire station. The project presents (p. III-49-50) a list of ways in which the project will reduce fire risk but they do not clearly answer the fundamental question about who (which fire department) will provide fire protection and what response times will be and how those response times will be related to narrow and slow roads.

C1g-17
(cont.)

The two additional issues are important when considering fire. One is the possibility, of great concern to the Valley Center community, that wildfires like the ones faced in 2003 and 2007 will happen again. In such a case, the 5,000 or so people in Lilac Hills Ranch will slow evacuation —possibly with devastating consequences—of the many people who must travel down Lilac Road to I-15—the principal exit route from Valley Center—to escape. Lilac Hills Ranch residents will act like a cork or a bottleneck. The presence of so many new people with no substantial improvement, widening or increase in roads greatly increases the risk to everyone should a major fire occur.

C1g-18

Second, locating an assisted care facility within the project also increases risk to those who are being cared for. Fire and emergency vehicles response will be slowed by the road system and at this point likely will not meet county standards. In addition, hospitals and good medical care are at some distance.

C1g-19

Waste Treatment. The Wastewater Recycling Facility will not be built during the early phases of the project. During the early phases sewage will be trucked off site and for the life of the project waste solids screened from liquid waste will continue to be removed in that manner. The wisdom and safety of this approach is highly questionable. The possibility of spills—and over time the near certainty of a spill—would create hazards for residents.

C1g-20

Phasing. An additional problem is phasing. There is no guarantee that later phases of the project will be built. The County has not required bonds or other assurance that these basic sanitation issues and the major road issues will be dealt with should the developer decide not to build later phases which trigger most sophisticated waste treatment and road improvements.

C1g-21

Questions: The Valley Center Community Planning Group asks the County to require the developer to solve the problems that plague every area of service and infrastructure development and to provide the community with information about these solutions. Without knowing what the developer will actually do, it is impossible to assess impacts on the schools, the fire services, evacuation, waste treatment and other issues. What assurance is there that a school will be built? If it is not where will students attend school and how

C1g-22

C1g-18 The Evacuation Plan (FEIR Appendix K) considers both evacuation and first responders traffic, as shown by it stating the following: “[d]uring an emergency evacuation from the proposed Lilac Hills Ranch development, the primary and secondary roadways will have to be shared with responding emergency vehicles...”

As indicated in the FEIR subchapter 2.7.6, impacts associated with emergency response and evacuation plans would be less than significant and no mitigation is warranted. The contingency plan evacuations will be implemented in phases, based on predetermined trigger points, so smaller percentages of the evacuees are on the road at the same time. When a wildfire occurs, if it reaches a predetermined trigger point, then the population segment located in a particularly vulnerable area downwind of that trigger point would be evacuated. Then, when the fire reaches the next trigger point, the next phase of evacuation would occur. This would allow smaller groups of people and correspondingly fewer vehicles to more freely evacuate areas. The Evacuation Plan determined that the location of the project and the existing and planned roads provide adequate multi-directional primary and secondary emergency evacuation routes (Evacuation Plan, page 8).

C1g-19 With respect to the distance from the Senior neighborhood to local health facilities, the FEIR analyzed response times and their impact on public safety. Subchapter 2.7.2.4 of the FEIR concluded that although response time to the project would not meet the requirements of General Plan Policy S-6.4, the four options identified in the FEIR would allow the project to be in compliance with the response times of the General Plan. DSFPD also determined that the project included additional factors that when considered by the District allowed them to determine that adequate service could be provided to the project site

C1g-20 Liquid sewage may be collected and trucked to an off-site facility for up to 100 homes. This is necessary due to the fact that a minimum flow would be needed to operate the WRF and as soon as sufficient flows are available, trucking of the liquid sewage would cease.

For ongoing operation of the WRF (if solids are processed on-site), residual solids will be trucked approximately once per week in a roll-off dumpster to a local landfill. This is the current practice at other VCMWD facilities.

LETTER

RESPONSE

	<p>C1g-20 (cont.) With respect to temporary wastewater treatment, if an on-site plant is used for sewer service, the initial phases of the project may require trucking of sewage from a collection point on-site to an existing wastewater treatment plant. Sewage will be hauled off-site using licensed waste haulers.</p> <p>C1g-21 The project is designed so that each phase of construction would trigger specific mitigation measures. It is correct that if those phases are never built, the mitigation would not be required. The project's Conditions of Approval would further assure that specific mitigation measures would occur prior to the construction of each construction phase.</p>
--	--

prepared are local school districts and local roads to handle the influx? How will people from central Valley Center evacuate in case of fire and what expansion of roads is required to make that a safe process? How will waste be managed if later stages of the project are not constructed?

C1g-22
(cont.)

5. LEED-ND/Sustainable and Walkable Community This project has not meaningfully addressed the requirements for LEED-ND development. The Specific Plan states that “The Lilac Hills Ranch planning and design applies...sustainable development principles to site selection, compact and efficient development footprint...clustered development... conservation of wildlife habitat and subordinating dependence on the automobile”. (p. V-9) It is hard to believe that these words are not meant in jest. A massive leapfrog project built on rural and farmland, covering 608 acres currently available as habitat for a variety of species, could not reasonably be considered LEED-ND compatible. There is no LEED-ND equivalent program like this one anywhere in the United States. The project fails to meet any of the site location and linkage requirements listed in the LEED-ND prerequisites and standards. It is leap-frog development pure and simple built many miles from the roads, schools and libraries that are needed to sustain a project of this size and that were purposely constructed in other Valley Center locations to support planned areas of growth. See: [https://www.nrdc.org/cities/smartgrowth/files/citizens_guide_LEED-ND.pdf].

C1g-23

The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is inconsistent with both the Guiding Principles and Community Development Model. For example, Guiding Principle 2 requires a project to promote sustainability by locating new growth near existing and planned infrastructure, services and jobs in a compact pattern of development” (p. V-1). While the project is near I-15 it lacks all other infrastructure and must create it anew. To argue that Lilac Hills Ranch meets the standard of this Guiding Principle (or virtually any of the others) is ludicrous.

C1g-24

The proposed addition of the Lilac Hills Ranch project in the far western portion of the Valley Center community flouts the Community Development Model by establishing high-density development away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.

The claim is made that all 1746 dwelling units will be within one-half mile or a 10 minute walk of at least one of the three proposed commercial nodes in order to support the concept of ‘walkability’. (p. V-2). However, the three commercial services areas are not of equal size, and will not have equivalent services available. The bulk of the commercial services will be available only in the northern node with

C1g-22 The FEIR discloses the full extent of the proposed project containing a full analysis of all potential impacts associated with its development. As shown in FEIR Table S-1 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 equivalency dwelling units (EDUs). If any impacts cannot be mitigated, the FEIR has fully informed the decision maker of such fact for their consideration.

C1g-23 General Plan Policy LU-1.2 specifically guides the development of new villages. Lilac Hills Ranch meets these criteria as explained in the Global Response: Project Consistency with General Plan Policy LU-1.2.

C1g-24 The comment is correct in noting that the Town Center and two Neighborhood Centers are not of equal size. Each is sized to be supported by the homes in the vicinity. However, each will provide commercial opportunities within one-half mile of all homes. The project is designed to encourage walking and biking. Figure 20 in the Specific Plan shows the trail system while Figures 25-46 in the Specific Plan illustrate street sections with sidewalks or adjacent trails. As can be seen on these same graphics, all major on-site streets have bikeways, including Main Street and Lilac Hills Ranch Road. Residents can access their closest commercial area or other amenity using the trails, sidewalks, and bikeways.

For additional details on the project’s consistency with the County’s Community Development Model, please see Global Response: Project Consistency with General Plan Policy LU-1.2.

substantially fewer services available in the other two nodes. In addition, the changes in elevation from one end of the Project to the other will tend to discourage walking, especially for senior citizens. Thus, residents in the central and southern sectors will likely still drive the one to two miles north for more than convenience store services. In the absence of major grocery and drug stores most residents will do their primary shopping off site.

C1g-24 (cont.)

Questions: The VCCPG would like the County to clarify what standards they will use to determine if the Accretive development is LEED-ND qualified and how they understand the project to meet any of the Guiding Principles in the San Diego General Plan. From our perspective, their claim to meet these standards represents a very tortured use of language. The County should apply scrutiny to terms like LEEDS-ND compliant if Accretive continues to use them. The public needs to be reassured that the language that is in the SPA carries the content normally associated with terms Accretive uses.

C1g-25

6. Agriculture- The General Plan Update adopted in 2011 set aside the area where the project is currently planning to build 1,746 homes as a place for agriculture and other rural and semi-rural uses. The area of the project is not characterized (as the specific plan indicates) by *historical* agricultural activity. It is a present-day agricultural area with a long, continuous history of growing and farming. Avocado, citrus, cactus, flowers, commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to schools, churches, senior centers, parks and homes in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the project at the planned site would greatly damage many currently productive and successful agricultural operations. [See Table 1 and Figure 1]

C1g-26

While this iteration of the Specific Plan no longer denies that the site is important to agriculture, the mitigation measures proposed are trivial. "The Agricultural Resources Report prepared by Recon Environmental...concludes...the site is considered an important agricultural resource due to its moderate rating for soil quality and a high rating for climate and water resources. Mitigation would be implemented, requiring the purchase of 43.8 acres of agricultural land or in-lieu credits through the County's PACE program" (P, V-4) Why would this project be built and allowed to destroy the lives and farms of individuals with deep roots and long tenure in the area? Why built Lilac Hills Ranch at all when it is not needed to meet housing projections and suffers from so many almost irresolvable problems—from roads, to fire danger, to school location to name a very few?

Questions: Given the careful protection of agriculture in the 2011 General Plan, what would lead the county to approve destruction of a traditional agricultural area in Valley Center in order to build homes that are not needed to house projected population growth? If this project is built, what compensation will be available to farmers who lose their livelihood and/or

C1g-25 See response to comment C1g-23.

C1g-26 Please refer to response to comment C1g-5 above. The property is currently designated as Semi-Rural, which is intended for lower-density residential neighborhoods, and agricultural operations. The existing A70, Limited Agricultural Use Regulations, which are intended to create and preserve areas intended primarily for agricultural crop production.

Historical and present uses are all accurately described in the FEIR in Chapter 1.0 and subchapter 2.4.

The project acknowledges that spraying does occur in the project area and does not propose to prohibit such operations. Strict regulations exist with respect to spraying and possible drift. It is anticipated that any such operations in the vicinity of the proposed project would be conducted in compliance with existing regulations Mitigation measures are required to buffer on-site residential and other uses from off-site agricultural operations which, in some cases, include pesticide usage. As detailed in FEIR subchapter 2.4, the project's mitigation measures include:

M-AG-2: A 50-foot-wide agricultural buffer planted with two rows of the appropriate tree crop (e.g., citrus, avocado) along specified areas of the project site; and

M-AG-3: A 6-foot-high fence shall be maintained along specified areas of the project site.

The FEIR includes a full evaluation of the project's compatibility with off-site agricultural operations, including a discussion of adjacency areas and off-site spraying. The project design features combined with the required mitigation is adequate to protect future residences with adjacency issues. Refer to Global Response: Agricultural Resources, Indirect Impacts for additional details.

are driven from use of their land by restrictions on spraying to control pests? Is this considered a violation of the property rights of farmers located near the project?

C1g-26 (cont.)

7. Twists of meaning and lack of clarity in the plan– One of the most difficult aspects of the Project’s Specific Plan is the extent to which it makes misleading claims. Accretive would have us believe that they are building a LEED-ND or equivalent development even though the project violates nearly all LEED-ND standards for site selection and linkage; that adding 5,000 residents to a rural, agricultural area actually improves traffic over narrow, winding rural roads; that grading and moving 4.4 million cubic yards of earth (enough to build a path 4-feet wide around the equator of Earth) preserves natural resources and habitat for animals.

In addition, after criticizing four previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or an idea that could easily change during construction rather than comment on a definitive plan that correctly describes their intentions. Even issues like public transportation are described conditionally. After explaining that public transportation “could be” an important planning consideration for reducing traffic, the Specific Plan says that “As Lilac Hills ranch is populated, North County Transit District *may* (emphasis added) adjust routes and services to meet the needs of the growing community.” (p. 11-29) At what point can the planning group expect to review a Specific Plan that explains clearly what will and will not be done?

C1g-27

C1g-27 The comment expresses the opinions of the commentator. 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. Please also refer to response to comment C1g-3 and the Global Response: Project Consistency with General Plan Policy LU-1.2.

Questions: Why are the Accretive/Lilac Hills Ranch developers not required to be clear about what they propose? After so many iterations of the plan, why does the clarity and specificity of the plan not improve? Can the county encourage or require the developer to answer the questions that the community repeatedly asks?

8. Phasing–One of the final major concerns about the project is the uncertainty that surrounds phasing and how this uncertainty is related to infrastructure the project will be required to build. The school and the Waste Treatment plan and some of the public road improvements are scheduled for relatively late phases. Other features such as internal roads may be delayed until the project is built out or nearly so. Mitigations for traffic impacts are tied to events that may not happen.

C1g-28

C1g-28 See response to comment C1g-21.

Questions: What certainty does the community have that promised improvements—even those promised in relatively late stages of the project—will be built if the developer does not complete the project through the later stages? Is bonded indemnification an appropriate approach? Why or why

not? Who would pay for necessary improvement to sewage removal or roads if the developer did not follow through to build later stages?

Other Concerns

Distribution of Land Uses

Table 1. The County General Plan Conservation and Open Space Element established goals of 10 acres of local parkland and 15 acres of regional parkland per 1,000 persons. The little over 20 acres proposed for public and private parks in this Project falls well short of this goal.

Water Resources

While the Specific Plan notes that imported water usage by the proposed project will be equal to or less than the usage by the present agricultural uses, the proposed imported water usage will not produce a significant amount of agricultural products. So water consumption will be about the same but production will be drastically lower.

General Plan Conformance

The Project's Specific Plan, in several sections, addresses the General Plan and Valley Center Community Plan. Yet the Project's Specific Plan fails to adequately acknowledge the fact that both of these thoughtfully constructed governing documents intend a completely different set of uses for the Lilac Triangle of west Valley Center, and fails to provide justification for the dramatic changes it proposes. The area was zoned for and intended to accommodate agricultural activities and large-acreage residential uses. The proposed Project is clearly incompatible with these intended uses. Both the General and Valley Center Community Plans designate other areas for land-uses such as the Project proposes. If one were to propose and construct a residential project of this magnitude that would be useful to society in general and this region in particular, they would apply their efforts to the central village area of Valley Center. The current Project, as proposed, is a cynical endeavor.

The applicant plans to locate up to 2.9 units per acre on land that currently allows, under the new County General Plan, 1 dwelling until per four acres (for 400 of the acres) or 1 dwelling per 10 acres (for 132 of the acres). Thus the land on which the applicant wishes to build 1,746 homes is reserved in the General Plan for **much** lower density. The applicant would increase the density more than 13 times the present allowable density. Thirteen times the allowable density indicates callous disregard for community character and community concerns.

Consider the 10 guiding principles that the San Diego County General Plan outlines for development:

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.

C1g-28 (cont.)

C1g-29

C1g-30

C1g-31

C1g-29 The referenced goal is a Countywide goal and does not pertain to individual development projects. The Park Land Dedication Ordinance (PLDO) states that private development's share of parkland is the provision of 3 acres of parkland per 1,000 population. The amount of parks being provided exceeds the 15.09 acres required by the PLDO. The project is required to provide 15.09 acres of public park land; 13.5 acres would be provided in a single public park located within Phase 3. At a minimum, the project would provide an additional 3.2 acres of private parks as required by the Specific Plan. The PLDO allows up to 50 percent credit for private parks. Thus, the 3.2 acres of private parks would receive 1.6 acres of credit. When combined with the 13.5-acre park, the PLDO requirement would be met.

C1g-30 The comment expresses the opinions of the commentator. 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, no further response is required.

C1g-31 The project, as described in the FEIR in Chapter 1.0, 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 allow a new Village, (2) amend the Valley Center Community Plan Map to allow Village Residential and Village Core land uses (and revise the community plan text to include the project), (3) amend the Bonsall Community Plan to allow Village Residential land uses.

The comment asserts existing Village areas are already designated in the Community plans for Bonsall and Valley Center and that the project is clearly incompatible with those intended uses. However, the establishment of a new village is not inconsistent with the location of existing village areas in the General Plan. The General Plan allows for the designation of new villages that meet the criteria of LU-1.2. 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 and for the application of Land Use Policy LU-1.2. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a full discussion relevant to these issues.

LETTER

RESPONSE

	<p>C1g-31 (cont.)</p> <p>As proposed, the project does conform to the General Plan Guiding Principles. The FEIR analyzes whether the project meets the Guiding Principles by its analysis of the appropriate policies that implement those principles throughout each of the subchapters of the FEIR and in Appendix W to the FEIR.</p> <p>The remainder of this comment provides the commenters opinion. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. No additional response is necessary. Please also refer to response to comment C1g-5 above.</p>
--	---

- 3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
- 4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
- 5. Ensure that development accounts for physical constraints and the natural hazards of the land.
- 6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
- 7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
- 8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
 - 9. Minimize public costs of infrastructure and services and correlate their timing with new development.
- 10. Recognize community and stakeholder interests while striving for consensus.

C1g-31 (cont.)

Can anyone who has read the Project's Specific Plan submission believe that it does not violate at least 8 or 9 of them? It requires the development of new roads, a new sewer system, and new water sources—all of them described vaguely and many of them resources to which the applicant does not have clear title or a well-developed plan for acquiring. It moves over 4 million cubic yards of earth by grading and by blasting. It is far from the heart of Valley Center where denser development is being accommodated.

Parcel Size Distribution.

The applicant suggests (p. 1-11) that the Lilac Triangle is already more densely developed than housing in the project Accretive proposes would be. In the One-mile Radius (figure 6), the applicant suggests that 81% of lots are smaller than the General Plan allows. This use of percentages is misleading and incorrect.

Thirty-six percent of all the lots in the One-mile radius [according to the applicant's analysis] are 2 to 4-acres and are consistent with the previous General Plan minimum parcel size. Additionally, by the applicant's analysis, 46% of parcels are larger than 4-acres, many much larger. And, viewed another way, 73% of all lots are 2-acres or more within the one-mile radius of the Project. The present General Plan was adopted two years ago, and many of the smaller lots were "allowed" under previous plans.

C1g-32

Most of the acreage in the Lilac Triangle is in parcels larger than 4-acres. That fact provides a more appropriate way to assess neighborhood character. The present General Plan intentionally reduces density in this area (over what was previously allowed) in an effort to retain existing agricultural land, most of which is represented by fewer, larger parcels. This is consistent with the Community

C1g-32 FEIR subchapter 3.1.4 analyzes the existing General Plan and community plan policies and concludes that the project is consistent with the County General Plan and the Valley Center and Bonsall Community Plans' policies that address community character. Community character is defined as those features of a neighborhood, which give it an individual identity and the unique or significant resources that comprise the larger community.

The existing Valley Center Community Plan (VCCP) does envision two existing rural Villages as the only areas recognized on the plan map where urban levels of development are permitted. The project proposes, as part of its General Plan Amendment, to modify the text of the VCCP to be consistent with the proposed project by changing the number of rural villages from two to three. The General Plan's goals and policies permit the establishment of a new village that is designed to be consistent with the Community Development Model, provide necessary services and facilities, and meet the LEED-ND Certification or an equivalent. See Global Response: Project Consistency with General Plan Policy LU-1.2.

Specific VCCPG policy consistency includes the following: 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. Additionally, the VCCP Land Use policies seek to preserve sensitive natural resources including steep slopes, canyons, floodplains, ridge tops, and unique scenic views (VCCP Policies A-1 through A-3). As detailed throughout the FEIR including subchapters 2.1 (Visual Resources) and 2.5 (Biological Resources), the project is designed to avoid disturbance of a majority of the on-site steep slopes and most sensitive habitats. Additionally, mitigation measures are included to assure the reduction of significant impacts to scenic views to the greatest extent possible. The Agricultural Goal of the VCCP seeks the preservation and enhancement of existing and future agricultural uses. As detailed in the Agricultural Resources

LETTER

RESPONSE

	<p>C1g-32 (cont.)</p> <p>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 including common open space areas, 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. For a detailed matrix of the project's consistency with the relevant policies of the VCCP, see FEIR Appendix W.</p> <p>The project is likewise consistent with the community character of the Bonsall Community Plan (BCP). As currently written, the BCP recognizes three areas with the Village Regional Category located in the Olive Hill Road/Mission Road and SR-76 area. The project proposes as part of its General Plan Amendment to modify the text of the BCP to be consistent with the project by changing the number of areas with the Village Regional Category from three to four. As discussed above, the General Plan's goals and policies permit the establishment of a new village that is designed to be consistent with the Community Development Model, provide necessary services and facilities, and meet the LEED-ND Certification or an equivalent.</p> <p>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, while preserving outlying rural areas outside of services and infrastructure (BCP Policy LU-1.2.1). Project grading would conform to the natural contours of the land and would not substantially alter the profile of the site (BCP Policy LU-1.1.3). The proposed project further assures consistency with relevant policies associated with this goal through the requirement for Site Plan review (BCP LU-1.2.2). BCP Goal COS-1.1 requires the preservation of unique natural and cultural resources. As detailed in subchapter 2.6 (Cultural</p>
--	---

Development Model, since higher density development is focused at the Valley Center community center along Valley Center Road. Some of what the applicant chooses not to recognize is that, in the Five-mile Radius (figure 5) many of the developments cited are clustered developments with an underlying density of 1 dwelling unit (DU) per 2-acres [i.e. Circle R Ranch, Lake Rancho Viejo] and not developments with lots as small as or smaller than those proposed for the project. Further, developments like Welk Resort are not single-family developments, but resort/timeshare clustered developments, also with an underlying one dwelling unit per 2-acres density. The present distribution of parcel sizes should not be misused to justify the proposed development.

It should be remembered that the recently adopted General Plan and the associated community plans are the defining factors in describing the desired plan for the community rather than the parcel size analysis of the applicant.

Question: Will the county confirm that neighborhoods surrounding Lilac Hills Ranch are, as this analysis asserts, much less dense than Accretive claims and thus cannot provide a rationale for a development with a 2.9 dwelling unit per acre development?

Relationship to General Plan

One of the more outrageous claims made by Accretive is that the project they propose is consistent with the general plan and with the Valley Center Community Plan (p.I-12) ("Appendix A provides detailed analysis regarding how and why this Specific Plan is consistent with the goals of the County General Plan.") The project will be in conformity to the general plan **IF** the SPA is approved and becomes part of the governing documents for the County. A plan that is far from the center of town, lacks basic infrastructure and is unable to explain clearly how that infrastructure will be created and operate, destroys local agriculture and creates housing that is not needed to account for Valley Center's share of projected housing growth is **NOT** in conformity with the general plan.

They ask (p.I-13) that the Land Use Element in the Valley Center Community Plan be changed to replace semi-Rural (SR-4) and (SR-10) designation with the Village Core/Mixed Use (C-5) designation and the VR2.9 designation, among many other changes. How is this consistent with the General Plan? The change proposed by this Project will grossly change the character of the existing rural, agricultural area of the Lilac Triangle and destroy the rural nature of the communities of Valley Center and Bonsall.

Question: We ask the County produce an analysis of where the Lilac Hills Ranch project conforms to the General Plan and where it deviates? Such an analysis would provide an "official" basis for this discussion of general plan conformity to proceed.

Leapfrog Development

C1g-32 (cont.)

C1g-33

C1g-34

C1g-32 (cont.)

Resources), the project includes mitigation measures required to assure that no known or unknown cultural resources are disturbed or lost as a result of project implementation. BCP Policy COS-1.1.4 requires development to be compatible with adjacent natural preserves, sensitive habitat areas, agricultural lands, and recreation areas. As detailed in subchapter 2.5 (Biological Resources), the project is designed to avoid disturbance of the site's most sensitive habitats through the dedication of 103.6 acres of open space. Additionally, Goal COS-1.2 requires the continuation of agriculture as a prominent use throughout the Bonsall community. The project includes agriculture throughout the project site including common open space areas, 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 compatibility buffers including groves of orchard trees, such as avocado and citrus.

Additional discussions, including a detailed matrix of the project's consistency with all other policies of the BCP is located in Appendix W.

Overall, land use impacts associated with policy inconsistencies would be less than significant.

C1g-33 See response to comment C1g-5 and C1g-31 above.

See also Global Response: Project Consistency with General Plan Policy LU-1.2. See also Appendix W of the FEIR for details of the project's consistency with the policies of the General and Community Plans.

C1g-34 See Global Response: Project Consistency with General Plan Policy LU-1.2.

Accretive argues that its project does not constitute leapfrog development (p. V-7) because it conforms to the Community Development Model (a conclusions which is challenged earlier in this analysis), that it provides necessary services and facilities, is designed to meet the LEED-Neighborhood Development Certification or an equivalent and is within established water and sewer boundaries.

Again, the Valley Center Community vehemently disagrees with these conclusions. The lack of fundamental services and facilities is a major problem with the development, which Accretive seems unable or unwilling to explain. How will it provide a circulation plan, emergency evacuation in the event of a disaster, sewage removal, schools or fire protection? They still assert that they will implement **one of four**—fire service strategies, (increased from one of three in the previous iteration of the Specific Plan) (p. V-14). After years in development and four iterations of the plan there still is not clarity about fire service to the area. Further, the project meets no known LEEDS or equivalent standards. While it is within established water and sewer service boundaries, the sewer service to the project remains problematic.

The community of Valley Center and the Valley Center Community Planning Group assert that the Accretive/Lilac Hills Ranch is **Leapfrog development** and is therefore prohibited.

Question: Before the project is allowed to go forward to seek approval will the applicant or the County spell out clearly how these basic services will be provided so that the community can comment on and evaluate actual plans? Will the County comment on whether the Lilac Hills Ranch project is or is not Leapfrog Development and explain their reasoning?

Development Approvals Needed

Apart from the need to amend the General Plan, and the Valley Center and Bonsall Community Plans, the applicant is asking for approval of a site plan for “V” and “D” special area regulations. (p.II-14) Setback designator “V” allows for very close urban spacing of buildings, spacing that is grossly inconsistent with the General Plan as it relates to Valley Center and, consequently, the Valley Center Community Plan. Special Area Regulator ‘D’ has several Site-Plan criteria that this project fails to adequately address:

“a. Building Characteristics. The dimensions, color, architectural design of the proposed buildings and structures shall be compatible and in keeping with those existing in the designated area.”

The proposed Project intends to inject a sweepingly new architectural treatment to the designated area. The types, dimensions, densities and architectural design being proposed are not consistent with the Lilac Triangle.

C1g-34
(cont.)

C1g-35

C1g-35 As noted by the reviewer, the proposed zoning includes the use of both the V Setback Regulator and the D Special Area Regulator. These have been applied for different reasons to assure that all development authorized by the Specific Plan will be implemented with the use of a Site Plan which will include details of the proposed development. The D Special Area Regulator has been applied to require a Site Plan for all development.

The Specific Plan includes detailed lot design and architectural design guidelines, and development applications that will need to include a Site Plan to identify which lot design and architectural style guidelines will be applied to each lot. 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. These development guidelines in Section III of the Specific Plan allow for and will result in a near endless variety in the lot sizes and architectural styles in the Specific Plan.

As encouraged by the Valley Center Community Plan, the project would include a wide variety of architectural styles and designs (page 8). In addition, the Valley Center Design Guidelines also allow design flexibility to achieve a variety of architectural character (page 4). The architectural styles proposed within the Specific Plan are also consistent with the Bonsall Community Plan, which requires diverse architecture (page 11).

“b. Building and Structure Placement. The placement of buildings and structures shall not detract from the visual setting or obstruct significant views.”

The density and heights of proposed buildings and other architectural features will dramatically and adversely impact the present rural, natural and agricultural setting of the area. This impact cannot be mitigated under the provisions set forth in this specific plan and will irrevocably deprive existing residents of their expectation of a rural, natural life style and environment.

C1g-36

“c. Landscaping. The removal of native vegetation shall be minimized and the replacement vegetation and landscaping shall be compatible with the vegetation of the designated area and shall harmonize with the natural landscaping. Landscaping and plantings shall be used to the maximum extent practicable to screen those features listed in subsections “d” and “e” of this section and shall not obstruct significant views, either when installed or when they reach mature growth.”

The Project proposes to excavate and fill over 4 million cubic yards of earth in pursuit of building sites and common areas on a total of 582.2 acres. Nearly all of the native and agricultural vegetation will be removed and existing agricultural areas will be severely diminished and completely altered on those acres as a result. The proposed plan will leave narrow strips, of so-called, biological open space that will be of little or no use to wildlife due the edge effects of human intrusion, invasive plants, night lighting, domestic dogs and cats, and fuel modification zones.

C1g-37

“d. Roads, Pedestrian Walkways, Parking and Storage Areas. Any development involving more than one building or structure shall provide common access roads and pedestrian walkways. Parking and outside storage areas shall be screened from view, to the maximum extent feasible, by existing topography, by the placement of buildings and structures, or by landscaping and plantings.”

The roadways proposed do not provide adequate ingress and egress for the proposed housing and commercial areas. The applicant has failed to provide substantive documentation of legal rights to develop adequate access routes for evacuation requirements. Further, the trail network proposed appears to depend on access along Covey Lane, a private easement for which the applicant has demonstrated no legal right.

C1g-38

“e. Grading. The alteration of the natural topography of the site shall be minimized and shall avoid detrimental effects to the visual setting of the designated area and the existing natural drainage system. Alterations of the natural topography shall be screened from view by landscaping and plantings

C1g-39

C1g-36 The Specific Plan also includes the application of the B Special Area Regulator, which would be applied within the areas designated with the C35 Zoning Use Regulation. The B Special Area Regulator is applied to those areas which will include uses subject to the Valley Center Design Guidelines. The Specific Plan and zoning both limit building height to 35 feet, the same as in the surrounding area with the exception of the non-habitable clock tower. See also subchapter 2.1, Visual Resources of the FEIR for a summary of significant impacts.

C1g-37 There is approximately 146.3 acres of native vegetation that exists on the property. Of this, 104.1 acres will be preserved. This equates to the preservation of 71 percent of the existing on-site vegetation and does not include additional off-site preservation of upland habitat required in the FEIR, subchapter 2.5. Effects on wildlife movement are discussed in the FEIR, in subchapter 2.5.2.4 and are considered to be less than significant. The removal of agricultural operations from much of the property is discussed in subchapter 2.4 of the FEIR. The open space design is consistent with the County’s guidelines. The open space areas include the sensitive habitat and an appropriate buffer. The project also requires fencing and signs to prohibit entrance into the preserved areas and lighting restrictions that assure sensitive habitat are not disturbed. . Details of the project’s biological project design features and mitigation measures are included in FEIR subchapter 2.5.

C1g-38 See Global Response: Easements (Covey Lane and Mountain Ridge Roads).

Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the Project, and determined that overall the road network design for the Project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.

All proposed on-site roads have been designed in accordance to the County Consolidated Fire Code and DSFPD, 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., Attachment P of the FPP. (FEIR, subchapter 2.7.2.3. See also Fire Protection Plan, pp 33-38.)

LETTER

RESPONSE

	<p>C1g-38 (cont.)</p> <p>The Evacuation Plan examined the existing and the planned roads and determined that the project would provide adequate multi-directional primary and secondary emergency evacuation routes.</p> <p>A detail of the project's rights to access, including easements held by the applicant and those required to be acquired are set forth in the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table.</p>
--	--

which harmonize with the natural landscape of the designated area, except when such alterations add variety to or otherwise enhance the visual setting of the designated area."

As noted earlier, the Project proposes to move **nearly four and a half million cubic yards of earth** on the 608-acre site, with blasting required for about 20% of that total. Obviously, this will not result in minimal alteration and it will detrimentally affect, in the grossest way, the visual setting of this rural, agricultural area.

Question: This appears to be an excessive and egregious amount of earth movement. Can the County limit earth movement on the project site?

"f. Signs. The number, size, location, and design of all signs shall not detract from the visual setting of the designated area or obstruct significant views. Subsequent to the site plan review and approval, any alteration to signs other than general maintenance shall be subject to a new Site Plan or an Administrative Permit."

The only reference to signage found concerns the monuments at the entrances to the Project and a standard for other signage is not defined except as to possible locations. The monuments description in the specific plan is more nearly marketing language than specific details about construction design and materials. A conceptual design is provided, but it is merely suggestive and provides no assurance that it is consistent with the Valley Center Design Guidelines. Clearly, the Specific Plan should defer to the existing Valley Center Design Guidelines, and those guidelines should be acknowledged in this plan to direct the implementation of signage for the Project as a whole, but especially for the commercial areas within the Project.

"g. Lighting. The interior and exterior lighting of the buildings and structures and the lighting of signs, roads and parking areas shall be compatible with the lighting employed in the designated area."

Since the designated area is presently rural and agricultural and subject to the Valley Center Design Guidelines, the Project and its specific plan should recognize those guidelines as the authority for all lighting implementation. Generally, little lighting is used in this area presently, so any change will be a significant departure from what exists and will severely challenge the present conditions. It will also exacerbate the light in the night sky that is such a challenge for the Palomar Observatory and their 200-inch telescope, a national asset. No matter how "sensitive" such street, architectural and signage lighting attempts to be, it all adds to the light "noise" in the night sky, obscuring views of the stars, and creating an urban atmosphere where a

C1g-39
(cont.)

C1g-40

C1g-41

C1g-39 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). 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. All graded areas will be landscaped with drought-tolerant plantings that are compatible with the surrounding environment as well as the theme of the project. 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 in FEIR Figure 1-15.

C1g-40 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 required for each residential area as well as the Town Center and Neighborhood Centers, and must meet the stated guidelines.

C1g-41 Lighting has been designed to comply with the requirements of the Light Pollution Code (LPC) and County Regulatory Ordinance (County Code Sections 51.201-51.209) that restricts the use of any outdoor lighting that emits undesirable light rays into the night sky. Lighting guidelines are located throughout the Specific Plan in Chapter 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. Conformance with County light requirements are included in the FEIR subchapter 2.1.

Specific Plan Comments 17

darkened rural one should exist.

C1g-41
(cont.)

Waste Water

The applicant is again deferring to the judgment of the Valley Center Municipal Water District [VCMWD] for a wastewater treatment plan and the need or no-need for an on-site wastewater treatment facility. (p. II-32) The Specific Plan, quite non-specifically, offers two alternative concepts for such an on-site treatment plant. The first is an on-site water reclamation facility with solids treatment. The second is a scalping plant that skims water from the sewage, while the remaining sewage liquid and solids would be piped off-site. VCMWD apparently prefers another alternative, which is to transport sewage through a forced main a few miles to the south to its Lower Moosa Canyon treatment facility. This facility is capable of only secondary-treatment, so any reclaimed water would be percolated back into the ground rather than applied to golf courses or other landscaping, unless the plant is upgraded. *A significant problem for this approach is the fact that sufficient right-of-way does not currently exist to construct the sewage forced main or recycled water lines.* This Specific Plan should specify which approach is to be undertaken rather than offer options, especially options fraught with intractable hurdles.

C1g-42

Biological Open Space.

An approval needed by the applicant is for the vacation of two existing biological open space easements totaling 3.64 acres. These two easements were at one time considered important set-asides for maintaining regional biological resources – resources that cannot be turned on and off and still retain significance. The applicant will be setting aside 104.1 acres of open space for the same purpose. It would seem prudent and reasonable to include the two existing easements in addition to the proposed easements for this Project. And again (p.II-23) the applicant proposes dedicating biological open space in phases.

C1g-43

Question: What is the impact of vacating two existing biological open space easements totaling 3.64 acres on various species of wildlife living within the Lilac Ranch Hills footprint?

Specific Plan Goals

The applicant suggests that their Project will “augment” several other large-scale projects along I-15 between Escondido and Fallbrook. A thoughtful analysis of the referenced projects will show that the only other project that compares with this Project is Lake Rancho Viejo at Highway 76, a clustered development with an underlying density of 1 DU per 2 acres. The other projects were approved under an older General Plan and the two largest projects, Castle Creek and Lawrence Welk Resort, are actually clustered developments with an associated open space component of about 40% of the total acreage, unlike this Project, which is currently expressing only a 16% open space component.

C1g-44

C1g-42 The proposed project is located in the VCMWD which is the service provider for the project. The County of San Diego Board of Supervisors Policy I-84 requires the submittal of a Project Facility Availability Form from the facility provider, indicating whether the facility provider can potentially provide facilities to serve a project. The forms also allow facility providers to recommend specific requirements that may be made conditions of project approval. The VCMWD has provided Project Facility Availability Forms from the VCMWD for both sewer and water, which indicate that the project is in the district and eligible for service and facilities are expected to be available within the next 5 years.

The Specific Plan addresses on-site land uses including the possible construction of an on-site water reclamation facility.

The FEIR (Chapter 3.0) describes several alternatives for treatment of wastewater, both on- and off-site as requested by VCMWD. The FEIR also includes alternative routes for wastewater transmission lines. The project applicant would implement either option for wastewater treatment as approved by the VCMWD. VCMWD has conceptually approved the Wastewater Management Report for Lilac Hills Ranch which provides additional information about all treatment options.

With respect to the comment related to having sufficient right-of-way to construct the sewage forced main or recycled water lines, four alternative pipeline routes are included in the Wastewater Management Alternatives Report of the FEIR (see Appendix S).). Alternative 4 utilizes Covey Lane, West Lilac Road, and Circle R Road to reach the Lower Moosa Canyon Wastewater Treatment Facility. This alternative does not have any new impacts to undisturbed land because the pipeline would be located within existing roadways. FEIR subchapters 1.2.1.7 and 3.1.7.2 have been revised to clarify that additional alternative routes for sewer lines have been considered and analyzed. See also Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties for the sewer alternatives.

LETTER

RESPONSE

	<p>C1g-43 The commenter is correct that there are two open space easements that exist within the project site. One open space easement was granted to the County of San Diego in conjunction with Parcel Map No. 17704, on June 10, 1996. The second easement was granted to the County per document No. 1996-030583 on July 12, 1996. Both easements prohibit all of the following on any portion of the land subject to the easement: grading, excavation, placement of structures, construction, mineral excavation, trash, dumping or any use other than open space. Limited vegetative clearing by hand as required by the fire authority is permitted within the first open space easement; within the second incidental agriculture, such as nursery crops, is permitted. Both open space easements would need to be vacated for development within those areas in conjunction with the approval of the Final Maps for the project. Both open space easements currently cover agricultural land, which would not require substitute mitigation. A small area of oak riparian woodland that is located within one of the existing open space easements would be preserved within the project's biological open space.</p> <p>C1g-44 Guiding Principal 2 does not prohibit new Villages. It states that "As population growth continues in San Diego County, more compact development should occur within existing and planned communities to reduce these impacts." See Response 5 and 31 above. See also Global Response: Project Consistency with General Plan Policy LU-1.2.</p>
--	---

That being said, a guiding principal of the current General Plan [principle #2] is to permit high-density development within or next to already developed property so that the infrastructure requirements can be more easily met. The goal is not to spread dense development to outlying rural areas where infrastructure must be extended and expanded to meet those needs, as is the case with this Project.

As a leapfrog type of development, the proposed Project must meet the LEED-ND certification or equivalent requirements as specified in the General Plan, which it fails to do. Clearly, the County's Community Development Model applies to, and is consistent with, the present General Plan and Valley Center Community Plan for the entire Valley Center community. **It is a misrepresentation** of the intent of the General Plan and the Community Development Model to suggest that the proposed project conforms to those concepts, models and plans. The proposed project is ignoring the Valley Center community in order to focus attention within its boundaries.

Sustainable Community Goals/Policies

In this iteration of the specific plan the applicant has chosen to diminish their commitment to sustainability by making some of their once 'earnest' goals and features decidedly optional. The recycling facility will be "provided and implemented based upon feasibility" (p. II-5). However, later in the Specific Plan (p.II-33) the recycling facility is discussed as if its construction and operation is a certainty. Shouldn't the Specific Plan decide and clearly state feasibility in such cases? It is a hollow feature otherwise.

Circulation Plans and Policies

The applicant is asking for road standard modifications to downsize rights-of-way, road, and lane widths required for off-site and on-site roads. They seek to "provide multi-modal roads that are narrower, with slower speeds" (p.II-6). These amendments are moving in the wrong direction for safety. Further, the five restricted gated access points are problematic for safe egress from the southern portion of the Project. The Valley Center Community Evacuation Route Study determined that locked gates on proposed evacuation routes were too unreliable in an emergency situation when there is a shortage of firefighting and sheriff's department personnel available to open gates.

The maps contained within the Specific Plan show an off-site location for a private road ostensibly to be used for internal, on-site circulation purposes. It extends roughly from the western end of Covey Lane westward across land that is outside the Project boundary.

Questions: Does the applicant have rights to use that path for the road? Also, the road from the eastern edge of the central part of the Project south to Covey Lane continues to be unexplained. Does the applicant have rights to that route? Does the applicant own that route? If the applicant owns that route, which County records seem to indicate, why is it not included within the Project boundaries?

County Land Use Regulations

C1g-44 (cont.)

C1g-45

C1g-46

C1g-47

C1g-45 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 include a site for a 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.

C1g-46 The comment raises concerns with respect to hazards associated with the roadway network. 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. Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the Project, and determined that overall the road network design for the Project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant.

As detailed in Section 4.2.7 of the FPP and subchapter 2.7.2.4 of the FEIR, gates proposed for the project would be in compliance with DSFPD guidelines and County Consolidated Fire Code Section 503.6. Any gate or barrier across a fire access roadway shall have specific plans reviewed and approved by DSFPD, and receive Specific Plan approval prior to installation. (FPP, page 36.) In addition, per the DSFPD conditions attached an part of the Project Availability Form (see Appendix R) gates accessing more than four residences or residential lots, or gates accessing hazardous institutional, educational, or assembly occupancy group structures shall also be equipped with approved emergency traffic control-activating strobe light sensors(s) or other devices approved by the fire code official. Subsequent to this public review, additional analysis was added to the FEIR that determined automated gates as recommended will require less time, roughly one-quarter to one-third the time to open and proceed through the gate and would results in minimal delay related to the time for the gate to move from closed to open. (FPP, pp 35-36.)

LETTER

RESPONSE

	<p>C1g-46 (cont.)</p> <p>The project would comply with DSFPD guidelines and County Consolidated Fire Code requirements related to gates, the recommendations of the FPP and project conditions related to emergency access, therefore no impacts associated with noncompliance with applicable fire codes related to secondary emergency access to the project would result.</p> <p>The proposed gates must all be equipped with an automatic device which will allow emergency services to open gates as they approach and which will allow the gates to remain open should evacuation be necessary. All gates will be constructed in accordance with County and Consolidated Fire Code requirements. The type and use of gates is further explained in the FEIR, subchapter 2.7 and the FPP.</p> <p>With respect to the legal right to use Covey Lane, Once Covey lane enters the Project from the east, it will be constructed entirely within the project boundary, and will not depend on easement rights. For that portion of Covey Lane from the boundary of the project to West Lilac Road please see the Global Response: Easements (Covey Lane and Mountain Ridge Roads).</p> <p>The project applicant is not required to include all the land they own within the Specific Plan boundaries. The applicant can define the project boundary in their application. However, the off-site impacts associated with the construction and use of the roadway identified in the comment are analyzed in the FEIR (subchapters 2.3, 2.5 and 2.6).</p>
--	---

Specific Plan Comments 19

The applicant has not justified their proposed general plan amendment to amend the Regional Land Use Element Map changing the Regional Category Designation of their property from Semi-Rural to Village and Commercial designations. To build what the applicant proposes, it is necessary for the designation to change, but they have offered no compelling justification for the change. Such changes to the County's General Plan as well as the Valley Center Community Plan and the Bonsall Community Plan should be justified. The point of such plans is to guide development in a direction that is consistent with the community's desires and the communities' commitments to the County for growth. The present General Plan, Valley Center Community Plan, and Bonsall Community Plan were written to address the needs for anticipated future growth within the County and in particular Valley Center and Bonsall. The proposed Project is not needed to fulfill growth commitments in either community.

Question: What justification can the applicant offer for the change to the Regional Land Use Element Map moving from Semi-Rural to Village and Commercial designations in their development?

Development Standards and Regulations/Design Concept

The applicant's Specific Plan suggests that the Project will help support the area's reasonable share of projected population growth. However, that is a specious assertion given that Valley Center's reasonable share of growth is 905 dwelling units. More than that number of units has been accounted for in the plans for the North and South villages within Valley Center. There is no apparent need for the 1746 units being proposed by the applicant, especially as they are proposed for an area remote from community infrastructure.

Question: Why is the applicant continuing to claim that the project is in support of the area's reasonable share of population growth when housing for that growth is accounted for in the existing General Plan?

Land Use Plan

The Land Use Plan shows some considerable change based on the shifting acreages among the different types of land uses in the project. However, the descriptions of the project's phasing continue to be very conceptual rather than specific. The question continues to be: at what point will the specific plan become specific rather than merely suggestive, contingent or conceptual? There continues to be only one Tentative Implementing Map—associated with phase one while maps for phases 2 through 5 are not scheduled to appear for some length of time after approval of the Project. This is rather like buying a pig in a poke.

Question: Can the County provide the community with greater specific information about the implementation for Phases 2 through 5? This information would allow for more informed decisions about the Specific Plan.

C1g-47 (cont.)

C1g-48

C1g-49

C1g-47 There is no CEQA requirement that a project be "justified" as suggested in this comment. The project's objectives are enumerated in FEIR Chapter 1.0 The inclusion of a General Plan Amendment is an allowable component to the project application, The project proposes to amend the Bonsall and Valley Center Community Plans to add another Village. The goal in the Valley Center community plan text will be revised to indicate that there are three Villages in the community plan. The Bonsall Community Plan will be revised to note the addition of a new village. Ultimately, it will be the policy makers, the Board of Supervisors, who will determine if the amendment will be in the public interest and not be detrimental to the public, health, safety and welfare. (General Plan, page I-15.) The project will, in fact, accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.

C1g-48 The proposed project would help contribute to the County-wide need for housing. The General Plan designated Valley Center and Bonsall as having a greater capacity to grow when compared to other communitiites. (General Plan, page I-25.).

C1g-49 The proposed project would be built in five phases over several years. However, the Specific Plan contains limits (density) and design guidelines that must be followed in order for future implementing maps to be approved and constructed. The Specific Plan also provides the flexibility needed to respond to any changes that may occur over time. The Specific Plan meets the requirements of the County and all requirements of Section 65451 of the Government Code.

Distribution of Land Uses/ Parks

Table 1 – Land Use Summary- shows that proposed public parkland in the Project decreased from 21 acres in a few public parks to 13.5 acres of park land since the previous iterations of the specific plan. Private parkland increased from 4.4 to 10.1 acres in 14 small and pocket parks and a private recreation center. (p. 1-5) The County General Plan Conservation and Open Space Element established goals of 10 acres of local parkland and 15 acres of regional parkland per 1,000 persons.]. The Project proposes adding over 5000 new residents, which should generate 50 acres of local parks and 75 acres of regional parks. Neither goal is close to being achieved by this specific plan. It seems the numbers are moving in the wrong direction. Further, larger parks would serve the Project better than the multitude of pocket parks described.

Questions: Will the project be required to meet the established goals of 10 acres of local parkland and 15 acres of regional parkland per 1,000 people? What will the configuration of those parks be?

C1g-50

Town Center/Neighborhood Centers

The bed and breakfast of earlier specific plans has become a substantially sized, 50-bed Country Inn. Commercial Mixed-use square footage has been increased from 75,000 sq. ft. to 90,000 sq. ft. (see Table 1) Rather than make changes to the project for rural compatibility as the VCCPG has suggested in previous comments, the current specific plan is expanding and extending commercial and office areas. The language used to describe these ‘centers’ continues to be vague and loose and non-specific.

Question: What is the role of a 50 bed Country Inn and 90,000 square feet of commercial space in a rural area? Valley Center already has much more commercial zoned area that it can develop. Why add so much more? Are their reasonable limits to how much commercial the county will allow?

C1g-51

Residential Component

In the first two drafts of the specific plan, the applicant claimed an overall density of 2.9 dwelling units per acre (du/ac), which is apparently the smallest applicable category the County recognizes for overall density [the calculation is 1746 du divided by 608 acres—a figure which leaves 200 individuals in group residential care out of the calculation). But, that density has been revised in the current draft, and reported to be an overall density of 2.36 du/ac [the result of dividing 1371 dwelling units on 582.2 acres]. However, that density yield seems specious. The 582.2 acres used in that calculation include open spaces, roads, parks and schools, areas that do not play much of a role in the perception of density. Oddly, the 582.2 acres does not include the areas with the C-34 designation or the 375 du that are a part of it.

Question: Why has the density calculation changed and why is open space included and 375 dwelling units not counted?

C1g-52

C1g-50 See response to comment C1g-29 above.

C1g-51 The project includes the Country Inn as an attribute to rural life and as a means to encourage a small tourism economy. The amount of commercial mixed use has not been increased and has been sized to support the proposed community. The types of uses allowed are set forth in the Zoning Use Regulations and the Specific Plan.

C1g-52 The project contains two distinct land use designations – “VR 2.9”, which stands for Village Residential, and “C5” which stands for Commercial. The project’s VR 2.9 land use designation is restricted to only single-family residential dwelling units. There are 1,371 single-family units planned within the available land area (580.2 acres) zoned for VR. The overall gross density is calculated by dividing 1,371 units by 580.2 acres, which equals 2.36 dwelling units per acre, which is below the allowable gross density of 2.9 units per acre. The Commercial Land use designation, “C5” contains 164 attached dwelling units and 211 mixed-use dwelling units, for a total of 375 dwelling units within the C5 designations. The total land area zoned for C5 is approximately 27.8 acres. The overall gross density is calculated by dividing 375 units by 27.8 acres, for a gross density of 13.5 units per acre. While the project supports densities up to 24 units per acre, the overall project density is 2.9 units per acre. This was calculated by dividing the number of units by the number of acres in the project. The density identified in the Specific Plan conforms to General Plan Policy LU-1.7 Maximum Residential Densities, which states that residential density is determined by taking the maximum number of dwelling units permitted within the boundaries of any subdivision based on the applicable land use designation.

The assisted living facility does not include individual kitchen and is not subject to density calculations pursuant to the Zoning Ordinance.

Looking at the 375 dwelling units in the Project that occupy 23.8 acres in the C-34 zoned areas, reveals urban densities in excess of 13 du/ac and, of that total, nearly 8 ac would have an urban density in excess of 20 du/ac. And those densities exclude the 200-bed assisted living facility that does not factor into the number of dwelling units.

As we noted in earlier comments, densities of this magnitude [13.8 du/ac and 20.75 du/ac and even the overall density of 2.9 du/ac] are more comparable to large urban centers than the rural, agricultural areas that surround the project property.

Senior Citizen Neighborhood

Although not discussed by the applicant, the designation of 468 dwelling units for an age-restricted Senior Citizen Neighborhood with an additional 200-bed assisted living/care facility could present a significant problem for prospective residents of those units who may need emergency health care. Presently, emergency services cannot respond to the Project within the guidelines required for such service. In addition, the nearest hospital is about 17 miles distant. To have a neighborhood facility for such a potentially fragile population without emergency medical services close at hand may prove problematic and will likely add significantly to the volume of emergency service calls to the Deer Springs Fire Protection District.

Earlier versions of the Project's Specific Plan called for the 200-unit assisted living facility to provide a kitchen for each unit. That proposal would have run afoul of the definition of a dwelling unit and increased the density of the Project to 3.9 DU/a. However, even without the kitchens, these units are a density deception.

Question: What detailed plans does the applicant have for providing emergency care for older individuals and those in assisted living who almost certainly will have needs greater than those of younger adults and children? The community would like to know the particulars of those plans.

Open Space/Conservation Policies

The Project's conservation goal of sparing the most sensitive habitats on the property presents itself well on first hearing. However, as laudable as saving sensitive habitat is [and it is a goal required by the County], the Project will be excavating and mounding the remainder of the Project site [that's about 1.5 cubic yards of earth moved for every square yard of the Project property]. Further, the applicant will have to develop any off-site mitigation of sensitive habitat somewhere in the County, but not necessarily in Valley Center or Bonsall. This will leave enormous destruction in its wake with no intention to repair it within project boundaries. It appears that restoration of habitat could occur almost anywhere else but the project site or its immediate neighborhood. This prospect is dismaying in that the destruction of habitat in Valley Center may lead to restoration of habitat elsewhere in the county without benefit to Valley Center. The

C1g-52 (cont.)

C1g-53

C1g-54

C1g-53 The General Plan guideline for providing emergency services is measured by the travel time of an emergency response team from the closest fire station to the farthest dwelling unit of the development not the time to transport a person to the nearest hospital. Please refer to Global Response: Fire and Medical Services.

The 200-unit assisted living facility has been revised to remove the allowance for kitchens and is no longer designated as a group residential (GR) facility.

C1g-54 The proposed project preserves 104.1 acres of natural habitat on-site, consisting mostly of wetlands and riparian woodlands. As discussed in FEIR subchapter 2.5, mitigation for wetland impacts will be provided on-site through the preservation of the open space areas, as well as restoration and enhancement. Additional off-site acreage would be required. Mitigation for upland vegetation would be provided off-site within the proposed PAMA. Consistent with the proposed North County MSCP, the location would be anywhere in the proposed North County MSCP PAMA that supports the appropriate vegetation See FEIR subchapter 2.5.

The project is evaluated based on the preliminary grading plan which identifies the anticipated amounts of cut and fill required to construct the project. Final grading plans will be required to substantially conform to these calculations or additional environmental review could be required. See above for mitigation and restoration requirements.

applicant should be required to mitigate losses of biological resources as close to the Project site as possible.

Questions: Could the applicant be limited in how many cubic yards of earth can be moved to construct housing and commercial areas? Could mitigation and restoration on or adjacent to the project site be required?

Community Recreational Elements

The trails network is somewhat changed from previous versions of the specific plan, but the trail standards for the various types of trails continue to be an issue. The Project should be required to comply with the standards and guidelines set forth in the county's Community Trails Master Plan, including those applicable to the Valley Center Planning Area. Pathways and trails should be a minimum of 12 feet wide unless topographically impossible. The standards for the Project's 'public' trails allow the tread area to narrow to as little as 3 feet, an unacceptable width for new trails.

Question: Will the applicant be required to construct trails that conform to the standards and guidelines in the Community Trails Master Plan?

Circulation Goals & Policies/Street System

The circulation goals/policies have changed in a few significant ways from the previous version of the specific plan. The idea of forcing convenient road improvements through the use of eminent domain is alluded to in the plan although it is not explicitly named. West Lilac Road "is designed to comply with County Mobility Element standards for public streets and with the Valley Center Community Right of Way Development Standard which provides standards for public road improvement..." Because the road is very narrow and winds quite a lot-- it was built to service a low density, rural area-- it will be widened and perhaps straightened. This process will impinge on the private property of many residents along the road. Private property will be taken in order for Accretive to build Lilac Hills Ranch. It will also make exiting from private driveways along this roadway more dangerous and problematic.

Although only West Lilac Road is named, other roads in the area are private are similarly narrow and residents along them may experience the same taking. Birdsong Road will be utilized as a public road until Phase 1 is completed.

Question: Is the County willing to exercise eminent domain along West Lilac Road-- and other roads like Mountain Ridge Road and Birdsong Road--to alter the road system to conform to the needs of Accretive and Lilac Hills Ranch?

The Community street system in Phases 1 through 3 will be available to the public traveling from the adjacent public road system except during public events (p.II-26). The Community street system in phases 4 and 5 is gated and not open to the public except during emergencies. Both figures 14 [Specific Plan Map] and 24 [Project Internal

C1g-54 (cont.)

C1g-55

C1g-56

C1g-57

C1g-55 The proposed trail system includes a variety of trails as described in the Specific Plan. The trail system incorporates some of the existing dirt roads to minimize the need for new disturbance of natural vegetation. No new trails have been added to the project; however, Figure 20 of the Specific Plan, "Trails Plan & Biological Open Space Signage" and the discussion of the trails in the Specific Plan text has been revised in regards to the County Master Trail (CMT) segments crossing the project. The first change is in regards to the CMT segment which is located along West Lilac Road and which is proposed along the project (south) side of West Lilac Road forming the project's northern boundary. There is one small segment that will be realigned south of the West Lilac Road right-of-way due to steep topography. This segment can no longer be defined as "Type D" trail because it is no longer in the road right-of-way for West Lilac Road. For this reason, it has been reclassified as a Ranch Multi-Use trail. The other CMT segment to cross the project is located in the southern portion of the project within an existing Valley Center Municipal Water District (VCMWD) water line easement. In this case the project proposes to build the trail segment within the project which will allow future trail development to the east and west to traverse the community. This trail also cannot be classified as a Type D trail because it is not in a road-right-of-way. As above this trail segment is classified as a Ranch Multi-Use trail. Both CMT trails will be built as approved by the County.

See responses to comments to letter C4 for additional details relating to the project's proposed trails.

C1g-56 With respect to the comment that the roadway system will be effectively closed except for Main Street, as stated in the FEIR and Specific Plan, the roads within the phases one, two and three of the proposed project are private but would be open to the public (Specific Plan, Section D.1.b). The only exception to this is the Senior Community (phases four and five) which is gated. All private roads would be maintained by the community HOA, eliminating any need for public road maintenance funds. The project can be accessed by the public from West Lilac Road and Covey Lane. Main Street provides an alternate route to West Lilac Road through the project.

LETTER

RESPONSE

	<p>C1g-56 (cont.) With respect to the road traversing over property outside the project. Lilac Hills Ranch Road is proposed as a private road, not open to the public, crossing an existing legal lot outside the project area. The off-site impacts associated with the construction and traffic impacts to this roadway are addressed in subchapter 2.3 of the FEIR and the Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and Off-Site Improvements – Environmental Analysis and Easement Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties.</p> <p>C1g-57 With respect to the maps being unclear about connecting Lilac Hills Ranch Road, the Specific Plan shows the circulation system necessary for the entire project. The street system for each phase would be designed at a future date and shown on subsequent implementing Tentative Maps. 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.</p>
--	---

Specific Plan Comments 23

Circulation Map] show what is available of the internal road system, but continue to fail to show residential private roads in any of the residential phases. The maps are unclear about the connection of the two halves of the Lilac Hills Ranch Road in the vicinity of Covey Lane. The maps also show a residential private road arrow traversing over property outside the Project boundary with no explanation of right of way.

C1g-57 (cont.)

West Lilac Road forms much of the northern border of the Project and is a county mobility element road. The current specific plan changes the West Lilac Road Mobility Element Classification from a 2.2C light collector to a 2.2F light collector. It is unacceptable to make that change to accommodate the aims of the applicant to divert traffic through their commercial center along 'Main St.' without regard to the existing community. The 2.2C light collector classification provides better traffic flow and greater traffic capacity because it includes dedicated turn lanes. These are essential characteristics for a mobility element roadway. The 2.2F light collector classification has a reduced two-foot shoulder, a rolled curb with graded pathway and a narrow right of way. Figure 25 of the specific plan shows a street section for the proposed change to West Lilac Road with an 8-foot minimum meandering pathway alongside. However, the standard should be a 10-foot minimum pathway.

C1g-58

The same concerns generated by earlier versions of the specific plan regarding roads that are graded to the natural contours with minimal disturbance to the natural terrain continue in this version. The lack of rural compatibility and sensibility in this specific plan extends to the residential architectural standards as well as the roads.

Question: When will Accretive or the County address the difficult road situation that is provoked by Lilac Hills Ranch and show explicitly what will be done and how it conforms to existing regulations. To what extent will exceptions be made for the project like the use of eminent domain or the substitution of a 2.2c light collector for a 2.2f light collector or a narrowed pathway?

On-site Water Reclamation Facility

There continues to be ambiguity concerning the water reclamation facility being proposed by Accretive for Lilac Hills Ranch. The specific plan states that Valley Center Municipal Water District will direct trucking of wastewater to an off-site treatment facility for the first phase of development. (p.II-33), and that during phase one wastewater from up to 100 dwelling units may be trucked off-site on a regular basis. However, phase one consists of 350 units, which may necessitate additional trucking of wastewater over narrow twisting roads.

C1g-59

The Project will not build a wastewater treatment plant during the initial phase of development but it is not clear from the specific plan when the facility is to be built. The current version of the specific plan has reverted to an earlier proposal of collecting and trucking the effluent to an off-site facility for treatment, making it unavailable for irrigation. This procedure will add numerous daily trips to and from the Project, trips

C1g-58 With respect to the comment that the 2.2C provides better traffic flow and greater traffic capacity, the 2.2F Light Collector does allow narrower shoulders, which, in turn, allows a road design that has fewer impacts to existing residents on the north side of that road. The FEIR also analyzes the construction of West Lilac Road as a 2.2C Mobility Element Roadway. Additional impacts associated with this alternative road design are detailed in FEIR subchapter 4.8. Main Street acts as a parallel route to West Lilac Road, effectively providing additional lanes to carry traffic. 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.

The pathway along the south side of West Lilac Road is a County Type D Pathway which allows an 8-foot treadway within a 12 foot easement. The proposed trail meets these standards as described in Section III a. of the Specific Plan.

The proposed internal road system does follow the topography as much as is allowed and still be consistent with County Private Road Standards and the Consolidated Fire. Private road standards allow overall grading to be reduced over what would be needed should the Public Road Standards be used within the project.

With respect to project grading, project grading would conform to the natural contours of the land and would not substantially alter the profile of the site. This is consistent with General Plan Policy LU-1.1.3. Further discussion of the project's conformance with both General Plan and Valley Center and Bonsall Community Plans related to community character is found in FEIR subchapter 3.1.4.

C1g-59 FEIR subchapter 3.1.7, and the Wastewater Alternatives Report (FEIR Appendix S) contain complete descriptions of the 4 alternatives for wastewater collection and treatment. As stated in FEIR subchapter 3.1.7, should either on-site treatment alternative (Alternative 1 or Alternative 2) be the selected alternative, the initial development within

LETTER

RESPONSE

	<p>C1g-59 (cont.)</p> <p>the project may be provided sewer service by means of trucking sewage from a collection point on-site to an existing wastewater treatment plant. This would be a temporary approach to allow sufficient wastewater flows to accumulate prior to the operation of a treatment plant. Trucking of sewage would be required for up to the first 100 homes (approximately three truck trips per day) to allow for a sufficient minimum flow to operate the facility.. Temporary trucking under Alternative 1 or Alternative 2 would add three trips per day to the road system and would cease when the minimum flow (first 100 homes) necessary for operation was reached. Treated effluent would not be trucked back to the project. The decision about which alternative will be used is the jurisdiction of the VCMWD and is unknown at the present time. The impacts of all alternatives are addressed in FEIR subchapter 3.1.7.</p> <p>The VCMWD Board approved Preliminary Concept Approval to the Project June 3, 2013. Part of the approval outlines a plan to providing wastewater treatment whereby the initial phase of LHR expands the Lower Moosa Canyon facility and a smaller on-site facility is constructed based on the needs of LHR and the Lower Moosa Canyon service area.</p> <p>The WTF would be constructed upon the time its requirement is necessary to serve the residents of the project. Details relating to the level of sewer treatment for each alternative, including disposal of solids is discussed in FEIR subchapter 3.1.7.</p>
--	--

LETTER

RESPONSE

that could go on for a lengthy but undetermined period. The last proposal was to construct a temporary 26,000-foot [5 miles] four-inch force main sewer line where effluent would be pumped from a temporary pumping station. While the current specific plan mentions treating the trucked effluent, it does not mention if the reclaimed water would be transported back to the Project, which would double the daily trips to and from the Project.

The specific plan has not defined the proposed Project’s wastewater management system beyond a platitudinous discussion of top-level options. But, it does appear that a wastewater reclamation plant for recycling of wastewater is proposed on-site at some point to serve the Project.

Questions: Precisely when will a wastewater treatment plant be constructed on site at Lilac Hills Ranch to reclaim water? In what location and to what level will sewage treatment occur? How will residual solids be managed in the long and short run, especially if other agencies are involved in solid waste handling?

Services and Infrastructure-Water

The applicant asserts that it is “looking at” four sources of water to meet the Projects needs in addition to Valley Center Municipal Water District [VCMWD] water, including “ground water, rain water harvesting, grey water and reclaimed water.” (p.II-32). Apart from the ten existing water wells on-site for ground water, which will be subject to VCMWD guidelines, the applicant is vague about the other sources and specifically how they will be employed. The applicant says cisterns and roof collection systems are “allowed” on single-family dwellings, but *does not commit to employing them* although the applicant comments “up to 35 AFY of rain water could be harvested by single family homes in the project”—presumably when all 1746 homes are complete.

Grey water systems are an “allowed use”, but there is no commitment to employ them although approximately 91 AFY a year could be realized from this source. (p.II-32). The applicant suggests that reclaimed water will be obtained from the VCMWD, although the VCMWD has no off-site easements for recycled water from its Lower Moosa Canyon treatment plant. This is all too fuzzy for a Specific Plan.

Question: Accretive should be explicit about sources of water and how various sources will be combined to meet the needs for potable and non-potable in Lilac Hills Ranch. Can the level of ambiguity about what will be done in areas of ground water, rainwater harvesting, grey water and reclaimed water be reduced? Can the County clarify these issues?

C1g-59 (cont.)

C1g-60

C1g-60 The mix of water to be used to supply potable and landscaping supplies will be determined by the VCMWD. Chapter 3.0 of the FEIR and Chapter 4.0 of the Wastewater Alternatives technical report describes various alternatives and analyzes the impacts of each. VCMWD has approved a Water Supply Assessment and Verification (“WSAV”) for the proposed project and issued a project Facility Availability Form for water and sewer service. Please refer to the approved WSAV and its Appendix A, for a calculation of water conservation rates.

The use of gray water systems will be allowed within the project, but due to the legal availability of sufficient water supply, gray water systems are not required. Rain barrels, however, would be required on all single-family homes, resulting in the reduction of exterior water use, over and above what is calculated in the WSAV. The use of either or both systems would reduce the cost of water to individual users.

As Detailed in the Waste Water Services Report, and further documented within the VCMWD Concept Approval, the Project has several options to employ the use of Reclaimed and Recycled Water within the Project. The Project could either elect to build an on-site Water Treatment Facility, or an Off-Site Water Treatment Facility, however the ultimate option will be selected by the VCMWD. The Project currently has easements and fee ownership connecting to public roads, form the project site to the off-site Lower Moosa Canyon facility site. Should the VCMWD select to move forward with the off-site alternative, the project would utilize the public rights-of-way.

The project will have to comply with all requirements of the VCMWD, including Article 190, Section 190.7 Conservation and Local Supply Use Requirements which requires the use of recycled water and groundwater. More specifically, on June 3, 2013 the VCMWD Board approved Preliminary Concept Approval for the project. Part of the approval included the “Conditions for Preliminary Concept Approval” which outlines the major issues related to providing service to the project with respect to water, wastewater, and recycled water. One condition specifically reads, “The Developer shall utilize recycled water within the proposed project, to the greatest extent possible, for all appropriate irrigation purposes in lieu of imported potable water.”

Services and infrastructure-Schools

The issue of which school districts will be serving the proposed Project continues to be unresolved. The latest Specific Plan proposes a twelve-acre site for a K-8 school, but there is no Project Availability Form from Valley Center-Pauma Unified School District, or Bonsall Union School District agreeing to manage the school although homes in phase 1 and 2 in the Bonsall school district and most of those in phase 3 are in VCPUSD.

C1g-61

Question: Will the students attend the schools whose district they live? Are those school districts prepared to accept the influx of new students? What, then, is the role of the K-8 school that may be constructed within Lilac Hills Ranch?

Further, the applicant has excluded the Fallbrook Union High School District from their current specific plan even though the project is still partially within that district and potentially will be served by that district. The issues of school location and school district choice matter because it fundamentally affects the Project's required traffic study. Are students to go to school in Valley Center and be bussed or driven over that set of highly impacted roads or are they to go to school in Bonsall or Fallbrook and be transported that way? Where traffic will be directed affects where roads will be impacted and need improvement.

C1g-62

Neither Bonsall nor Valley Center has presently indicated a willingness to manage an additional school. How, then, are the community or other decision makers to know which roads will be impacted and by how many children (will we need to consider K-12 or just high school students) or how to evaluate the data provided in the traffic study?

Question: Will the county clarify where students will attend school and what the role of the K-8 school on the Lilac Hills Ranch plan may be? What is planned for high school students who may be as numerous or more so than younger students? How will these plans affect traffic flow?

Sign Plan

The Project's sign plan should incorporate standards already in place in the Valley Center Design Review Board's guidelines. A single standard should be in use throughout Valley Center.

C1g-63

Sustainable Community Design

The applicant cites General Plan Guiding Principles #2 & #9 in the course of a discussion of conformity to both the General Plan and its Guiding Principles, but fails interpret them correctly or to provide the context of the other eight guiding principles.

C1g-64

C1g-61 As noted in FEIR subchapter 3.1.5 the project includes a 12-acre site for the possible construction of a K-8 school. Prior to construction of the on-site school, students living within each district would attend local facilities. Once constructed, the on-site school would accommodate all K-8 students living within the project site. There are several possible options for the K-8 school, which may be 1) either independently operated, as a private school, 2) operated as a charter school, or 3) operated as a Public School. The Bonsall School District recently indicated that they would be interested in operating a future K-8 school within Lilac Hills Ranch, as part of their school district. High school students would attend either Bonsall or Valley Center High School, depending on the location of each home relative to the school district boundaries.

As further discussed in the FEIR, the project would increase attendance at both VCPUSD and BUSD school districts. Pursuant to its PFAF, VCPUSD 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. The students within the project would continue to attend schools in their associated districts which have indicated their capacity to accommodate such students.

The proposed school site would be offered to the local districts, or potentially as a private school, and reserved for possible acquisition. Construction of the school facility on the site would ultimately be the responsibility of the school district. In addition, the applicant will be required to pay school impact fees pursuant to California Government Code Section 65996(b).

C1g-62 Fallbrook schools were not included in the project's analysis because Proposition BB was approved by voters in the Fallbrook and Bonsall school districts to create a new K-12 district, BUSD. Approximately 208 acres of the northern portion of the site are within the existing BUSD as a result of the successful unification. The remainder is within VCPUSD. Traffic impacts associated with the school use are accounted for in the projects Traffic Impact Study (FEIR Appendix E). Assumptions are based on trip generation rates for the proposed Lilac Hills Ranch project were developed utilizing SANDAG's Guide to Vehicular Traffic

LETTER

RESPONSE

	<p>C1g-62 (cont.) Generation Rates for the San Diego Region (SANDAG, April 2002). Specifically, Table 4.8 of the Traffic Impact Study identifies the project trip generation for Phase E, which includes a proposed elementary and middle school. As the proposed on-site K-8 school is intended to serve the Lilac Hills Ranch project, 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> <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.</p> <p>C1g-63 Section II-KI of the Specific Plan provides a Sign Plan, which provides community sign standards on the types of signs. The sign standards in the Specific Plan would be subject to Valley Center Design Review per the "B" Special Area Regulator.</p>
--	---

LETTER

RESPONSE

Guiding Principle #1 states "Support a reasonable share of projected regional population growth. The Community Plans of Bonsall and Valley Center, which are integral to the County's General Plan, already provide for their share of the projected growth well into the future, without the Project.

Guiding Principle #2 (already discussed) is meant to bear on the entire community of Valley Center, not merely the boundaries of the project. This project, as proposed, is isolated in an area designated for large parcel agriculture in contradiction to this guiding principle. Rather than concentrating density at the center of Valley Center as the General Plan does, this Project will hopscotch density into an area where it is not intended, defeating this principle.

Guiding Principle #3, which states, "Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities." The proposed Project does not reinforce the existing community, but instead reduces community vitality by attempting to establish a competing town center.

Guiding Principle #4 states, "Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance." This Project will remove natural and agricultural habitat from the swiftly diminishing inventory in San Diego County.

Guiding Principle #5 states, "Ensure that development accounts for physical constraints and the natural hazards of the land." This project is proposing to cut and fill nearly four and half million cubic yards of earth and rock to support the development of buildings and infrastructure. There is no recognition of, nor deference to, the hilly and sometimes steep, topography of the site.

Guiding Principle #6 states, "Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation." While the Project does have a system of trails and roads, most of these are private and internal to the Project with only very limited connection to the existing public trails and roads of the Valley Center community.

Guiding Principle #7 states, "Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change." The Project's Traffic Study strains unsuccessfully to make the greenhouse gas emissions generated by the Project to fit into the standard established by the State of California.

Guiding Principle #8 states, "Preserve agriculture as an integral component of the region's economy, character, and open space network." This Project destroys agricultural lands and urbanizes them. The claims that the Project will preserve certain

C1g-64 (cont.)

C1g-64 Regarding project consistency with the General Plan ten guiding principles, all of the goals and policies of the General Plan are based upon the ten guiding principles that are set forth in Chapter 2 of the General Plan. (General Plan, pp. 6.) The FEIR analyzes whether the project meets the ten guiding principles by its analysis of the appropriate policies that implement those principles throughout each of the subchapters of the FEIR and in Appendix W to the FEIR. Please also refer to Global Response: General Plan Amendment CEQA Impacts Analysis. The project's consistency with the General Plan will be considered in the decision.

See response to comments C1g-5, C1g-31 and C1g-44.

remnants of orchards is more of a nod to a landscaping theme than a serious interest in preserving agriculture.

Guiding Principle #10 states, "Recognize community and stakeholder interests while striving for consensus." There has been minimal exchange between the applicant and the Valley Center community on this Project, despite numerous public planning group and subcommittee meetings devoted in whole or in part to this project. On all the previous versions of the Specific Plan for this Project, very little concession has been made to the concerns of the elected officials representing Valley Center—despite repeated Planning Group comments and criticisms, virtually nothing has changed and little clarification has emerged. So-called "public meetings" organized by the applicant have been by invitation only and only invited a very thin segment of the Valley Center community.

Question: Will the County review these ten guiding principles with Accretive, considering the views of the community that the project meets almost none of them? Can Accretive's conformity or non-conformity to the ten principles be clarified so that the developer and the community will understand how County staff and planners are receiving these claims?

The General Plan requires *Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND)* certification or equivalent to allow the leapfrog development this project represents. The prerequisite for such certification requires that site location and linkage be done on brown fields or infill sites, not green field, rural or agricultural sites. While the applicant may eventually build houses and buildings with LEED-ND building standards, they fail to meet the critical prerequisite of good site selection. The applicant continues to tout the Project's town center as consistent with the Community Development Model, ignoring the surrounding community of Valley Center and its consistency with the Community Development Model and General Plan.

Question: What does the county accept as the necessary conditions to establish LEED-ND equivalence? Can the County explain whether or not they consider this project to meet those essential conditions and how they reach that conclusion?

Development Standards and Regulations: On/Off-site Circulation Plan. Changing a portion of West Lilac Road along the northern boundary of the Project, a public road, from a 2.2C to a 2.2F light collector will impede traffic on the mobility element system in Valley Center unnecessarily. The 2.2C design is necessary at General Plan build-out and should not be waived for the convenience of the applicant. It is a crucial element of the Community Evacuation Route Study [CERS] plan for emergency evacuations. We have noted the poor interconnection of the Project's roads, both public and private, and have commented separately on the road standard modification requests made by the applicant, all of which provide economic benefit to the applicant and reduced design speed and safety to the public.

C1g-64 (cont.)

C1g-65

C1g-66

C1g-65 The comment refers to a prerequisite required by LEED-ND. Please see the Global Response for Consistency with LU- 1.2 for a discussion regarding the project's determination as a LEED-ND equivalent designed project.

C1g-66 Approval of the project's application to downgrade the classification of West Lilac Road from 2.2C to 2.2F would not impede traffic flow along this road. This change in designation would reduce required right-of-way and shoulder width and would not impact road capacity. However, as discussed in FEIR subchapter 2.3.1.3, and the Traffic Impact Study Section 3.3, to reflect the reduction in the roads classification, a 10 percent threshold reduction was applied to conservatively show: (1) the limited portion of the roadways where shoulders are reduced and the minimal effect of shoulder width on roadway capacity, and (2) the limited roadway length where speeds are reduced due to substandard minimum curve radii. By reducing the capacity threshold by 10 percent, each of the County LOS thresholds for these roads were reduced by 10 percent, meaning that it would take a lower amount of traffic to trigger a significant impact than without the reduction. The impact analysis included in the FEIR accounts for this threshold reduction.

A detailed analysis of the effects of the road exceptions on other environmental impact categories is provided in the No Road Standard Modifications Alternative in subchapter 4.8.

Likewise the project's road modification requests would not affect emergency evacuation because road capacity is not reduced. The project is consistent with all relevant Mobility Element policies and will not result in incompatibility with transportation hazards. See Global Response: Project Consistency with General Plan Policy LU-1.2 and FEIR Appendix W.

With respect to the IOD taking a substantial swath of the open space, the IOD shown on the Implementing TM would allow the County the ability to realign West Lilac Road at some point in the future. The lots adjacent to the IOD have been designed to avoid conflicts with the IOD.

LETTER

RESPONSE

The Project internal circulation map [fig. 24 and others] indicate an IOD [irrevocable offer to dedicate] at the northern end of the Project from the project entrance on West Lilac Road easterly to the boundary of the Community Plan Areas. This IOD, if exercised, would transit an open space, taking a substantial swath of the space and rendering it even less effective for its biological purpose. This IOD would also complicate the local circulation of traffic in non-project areas.

Question: What is the purpose of this IOD? Why is it allowed when it complicates local circulation in non-project areas and detracts from important biological space?

The Rights-of-way, or street lots, for the Main Street have been reduced in width since earlier versions of the Specific Plan.

Question: What is the explanation for this reduction, especially given that the trend in road development seems to be to widen rights-of-way to more easily accommodate wider travel lanes, bike lanes, trails, medians and shoulders?

Figure 24 shows an internal private road that exits the Project boundary at approximately the western end of Covey Lane and transits, in a westerly direction, property that is not a part of the Project before re-entering the Project boundary.

Question: Does the applicant have development rights satisfactory to the County to build that road?

Development Standards and Regulations: Existing Structures to Remain
The sixteen parcels with existing structures should be included in the 1746 dwelling unit total. Even if they are eventually demolished, they likely will be replaced with other dwellings, and therefore should be added to the 1746 dwelling count. These structures should be counted no differently than the new ones being built.

Question: Should these 16 existing homes legitimately be added to the count of 1746 dwellings that are planned for construction? How will adding these homes affect the density of the project?

Implementation. Public Facilities Finance Plan and Finance Plan
This "plan" is no more than a description of options. (p.iv-17) There is nothing specific about it. It is merely a list of recommendations.

Questions: Could Accretive be asked to clarify which of the financing plans they intend to pursue? What assurances can they offer that neighbors in the area will not be asked to help pay for roads or face increased state taxes to cover other services that must be created to facilitate the Accretive project?

C1g-66
(cont.)

C1g-67

C1g-68

C1g-69

C1g-70

C1g-67 The two-way sections of Main Street vary in width from 50-72 feet depending on location within the project. A landscaped median, sidewalk and bike lane are included in all sections. Each one-way section of Main Street is 42 feet wide and includes travel lanes, parking, bike lane and sidewalk. The street is designed to accommodate all uses. See FEIR Chapter 1.0 and Specific Plan Chapter 2.0 for additional information.

See also response to comment C1g-66.

C1g-68 See Global Response: Off-Site Improvements - Environmental Analysis and Easement Summary Table for details relating to the project applicant's easement rights for all off-site improvement areas.

C1g-69 The existing homes are not part of the Specific Plan and are not included in the total number of dwelling units.

C1g-70 It is common for a Specific plan to provide multiple options for financing opportunities. This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

Conclusion

The Valley Center Community Planning group recommends that the Accretive' Lilac Hills Ranch Specific Plan be denied. It tramples far too much on the General Plan and the Community Plans to be approved. The County should instruct Accretive to revisit plans for this project and bring them into conformity to local and county planning documents. The applicant's General Plan Amendment and Specific Plan—which deviates so greatly from existing planning law—would, if approved, set a range of new precedents in San Diego County land use policy, override the intent of the 2011 General Plan and severely diminish the authority of the Valley Center and Bonsall community plans.

C1g-71

C1g-71 Concluding statement is acknowledged. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

If the plan is ever re-submitted for additional consideration, the VCCPG wishes to receive more specific, detailed information about the project and to see changes that make it consistent with the requirements of State mandated Specific Plans. It must provide far more clarity and offer details that allow the planning group a greater ability to fully evaluate what is intended. Much of what we have been presented so far is suggestive, contingent or conceptual with few specific.

In addition, far too few of the substantive issues requiring resolution that were identified in the October 22, 2012 Valley Center Community Planning Group comments, the December 10, 2012 Planning and Development Services letter to the applicant, or the March 11, 2013 or the August 2013 Valley Center Community Planning Group comments, have been adequately addressed. Any future re-submission or re-issue of the Specific Plan should address the comments already made

C1g-72

C1g-72 Concluding statement is acknowledged. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

Those of us who have read iteration after iteration of the Project's Specific Plan are mystified. We are interested in reviewing a project that conforms to the existing General Plan and the Valley Center and Bonsall Community Plans. We believe, on the basis of the information presented, that this project will brutalize 608-acres of agriculture and open space by inserting urban development into a rural landscape. It is not a good fit with either Bonsall or Valley Center and would destroy the community character of both. We want the Project to show respect for the General Plan and its principles. We want a project that will not destroy Valley Center, the lives of our neighbors and the entire planning process in the County.