

Letter C1i

EXECUTIVE SUMMARY 1

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

Executive Summary: Lilac Hills Ranch DEIR Responses

A. Introduction

This Executive Summary is intended to aid reviewers of the comments on the Lilac Hills Ranch Draft Environmental Impact Report [DEIR] submitted by the Valley Center Community Planning Group. The review of the DEIR prepared by the County Department of Planning and Development Services, the Lilac Hills Ranch Specific Plan prepared by the applicant, and many technical reports that are the basis of the DEIR prepared by various consultants, has generated a significant volume of comments. The thousands of pages that make up the DEIR documents and their sometimes very technical nature made it difficult for volunteers to review and respond to every item in the relatively short time allowed. However, the principle issues are addressed in some detail in the responses that accompany this summary.

This summary does not substitute for the detailed comments and analyses presented in the attached comment documents.

B. Chapter 1

1. Project Objectives - The following excerpt from the DEIR summarizes the Project Objectives:

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

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

1. Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County's Community Development Model for a walkable pedestrian-oriented mixed-use community.
2. Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes and that provides public services and facilities that are accessible to residents of both the community and the surrounding area.
3. Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to

C1i-1

C1i-2

C1i-1 This comment is an introduction to comments that follow. No further response is required.

C1i-2 The commenter's statement of the project objectives is noted. The project objectives, developed by the County, are compliant with CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project. In addition, the project's objectives aided in developing a reasonable range of alternatives. Alternatives need to satisfy "most of the basic objectives of the project." A reasonable range of alternatives were discussed in the FEIR.

The County disagrees with the comment. Property located along I-15 or SR-76 could meet this objective. Subchapter 4.1.1.1 analyzed and rejected an off-site alternative.

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the town and neighborhood centers.

4. *Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.*
5. *Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.*
6. *Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.*
7. *Provide the opportunity for residents to increase the recycling of waste.*
8. *Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.*

C1i-2
cont.

The County has structured the Objectives of the EIR, in aggregate, so narrowly that only the Lilac Hills Ranch Project, as proposed by the applicant, can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. The VCCPG response takes exception to the implied claims that the Project meets all of its own objectives and suggests that other alternatives to the proposed Project may fit the objectives better.

Objective One

The County has structured Objective One of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Two

The Project does not meet its own objective for Objective Two.

Objective Three

We do not have any issues with this objective other than to state that any Project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Four

The Project does not meet its own objective for Objective Four.

Objective Five

We do not have any issues with this Objective other than to state that any project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Six

The County has structured the sixth Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Seven

Any Project Alternative would comply with this Objective equally.

Objective Eight

C1i-3

C1i-4

C1i-5

C1i-6

C1i-7

C1i-8

C1i-9

C1i-3 through C1i-10

The commenter's statement of the project objectives is noted. The project objectives, developed by the County, are compliant with CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project. In addition, the project's Objectives do not limit its ability to implement the project in a way that precludes it from implementing reasonable alternatives to the project. Alternatives need to satisfy "most of the basic objectives of the project." A reasonable range of alternatives were discussed in the FEIR.

C1i-3 For further discussion of EIR Objective One, please refer to responses to comment C1s-3.

C1i-4 For further discussion of EIR Objective Two, please refer to responses to comments C1f-6 through C1f-8.

C1i-5 For further discussion of EIR Objective Three, please refer to responses to comment C1f-9.

C1i-6 For further discussion of EIR Objective Four, please refer to responses to comment C1f-10.

C1i-7 For further discussion of EIR Objective Five, please refer to responses to comment C1f-11.

C1i-8 For further discussion of EIR Objective Six, please refer to responses to comment C1f-11.

C1i-9 For further discussion of EIR Objective Seven, please refer to responses to comment C1f-12.

The County disagrees with the comment. Property located along I-15 or SR-76 could meet this objective. Subchapter 4.1.1.1 analyzed and rejected an off-site alternative.

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This objective is subjective and could be met by developing the Project at General Plan densities, which would preserve existing agricultural businesses and residential-based businesses.

C1i-10

2. Project Inconsistencies with Regional and General Plans

In comments submitted over the last year, the Valley Center Planning Group and the Valley Center Design Review Board have challenged the proponent's assertions that this SP/GPA is consistent with the adopted County General Plan [GP], or with Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.

Our previous comments, which are attached, have also challenged the logic exhibited throughout Accretive Investment Group's Specific Plan and now in their Draft Environmental Impact Report (DEIR): that amending a particular GP Regional Category to suit the project somehow also reconciles the project's inconsistencies with a wide array of General and Community Plan Goals and Policies.

C1i-11

The proposed SP/GPA is inconsistent in broad and fundamental ways with the San Diego County General Plan and Community Plans of both Bonsall and Valley Center. Further, the DEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences as CEQA requires. The DEIR is derelict in concluding as it does that: "Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant" (Chapter 3 Environmental Effects Found Not To Be Significant (p 3-65).

This DEIR fails to perform the analyses required for decision makers, first, to understand the parameters of this proposal, and, second, to appreciate the nature and reach of its impacts. The DEIR does not even have a rudimentary analysis of Consistency with the General Plan.

C1i-12

Internal consistency is required of all County General Plans by California State Law. Therefore, in considering a Specific Plan, particularly one that requires amendments to an adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designations and road classifications, principles, elements, goals and policies.

C1i-13

A Specific Plan is an implementation vehicle. Approval requires compliance with CEQA; consistency as well with the web of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific

C1i-11 The County acknowledges your comment and opposition to the project. 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. The Regional Categories Map and Land Use Maps are graphic representations of the Land Use Framework and the related goals and policies of the General Plan. (Chapter 3, page 18.)

The General Plan states that it is intended to be a dynamic document and must be periodically updated to respond to changing community needs. (General Plan, page 1-15.) 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 clearly 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 and Appendix W for a thorough discussion on related topic. However, because the comment does not raise an environmental issue, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

The commenter broadly questions the project consistency with the General Plan. The FEIR analyzes and concludes the project is wholly consistent with the General Plan. Please refer to Appendix W for a more thorough discussion of this topic. With regard to mention of consistency with the General Plan Guiding Principles, it should be noted that all of the goals and policies of the General Plan are based upon these principles which are set forth in Chapter 2.0 of the General Plan. (General Plan, p.2-6) The FEIR analyzes whether the project meets the 10 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.

C1i-12 through C1i-14

The commenter in general, questions project consistency with General Plan and in particular, consistency with County "smart growth policies." See Appendix W for a thorough discussion of this topic.

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Plan – the tail wagging the dog. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the August 3, 2011 San Diego County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review.

We all can understand why the applicants might want to avoid disclosing the array of GP and CP Goals and Policies that this project violates. But CEQA's purpose is not to gloss over or obscure inconsistencies in order to ease approval of this project. CEQA's purpose is disclosure. Therefore, the DEIR for this SP/GPA must reckon specifically and individually with the General Plan Vision and Guiding Principles and the reflection of these in the Community Development Model, as well as with Goals and Policies across the GP's seven elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety and Noise; as well as goals and policies of the Bonsall and Valley Center Community Plans.

Once inconsistencies are disclosed there are only three ways to resolve them: reject the project, re-design the project, or re-build the County General Plan to suit these applicants. Inconsistencies with General and Community Plans, Design Guidelines and other ordinances and policies are NOT subordinate to this project's Specific Plan, as the Specific Plan asserts.

The full text of the General Plan and Community Plan Inconsistencies comments does an exhaustive analysis of several of the General Plan and Community Plan goals and policies to reveal the inadequacies of the proposed Project and the premise being advanced to allow its approval.

C. Chapter 2

1. Biological Resources

The DEIR cites three sensitive plant species observed on the Project site as well as observations of 13 Group 1 animal species ranging from lizards, snakes and jackrabbits to raptors, passerine birds and mule deer. Beyond the cited plants and animals, the DEIR notes the projected significant loss of several native plant habitats with special importance for the cited animal species and others such as mixed southern chaparral and coastal sage scrub.

The DEIR indicates that these significant losses can be mitigated off-site through the purchase of land within the draft PAMA based on a formula developed by the County. However, the DEIR does not account for the loss of 608-acres of raptor foraging area, which includes both natural vegetation formations and agricultural lands. The proposal is to set aside 77-acres off-site for raptor foraging calculated using the losses of sensitive native vegetation. It does not include in that calculation the lost agricultural land foraging area.

C1i-13
cont.

C1i-14

C1i-15

C1i-12 through C1i-14 (cont.)

Regarding General Plan Policy LU-1.2, this policy permits new villages that are consistent with the Community Development Model, are located within existing sewer and water service district boundaries, and are LEED-ND equivalent. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion and analysis of consistency of the project.

C1i-15 While agricultural lands can provide some foraging habitat for raptors, the use of pesticides and other animal control methods to limit damage to crops reduces the value of these areas as foraging habitat. County Guidelines for Determining Significance do not require biological mitigation for the conversion of agricultural land. Native habitat areas and grasslands provide the highest quality raptor foraging land and the project would mitigate the loss of these types of habitats. Raptors in the area would adjust their foraging area to include un-disturbed lands surrounding the project site.

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The DEIR suggests that the impacts to the three sensitive plants and 13 sensitive animals [and we assume the resident plants and animals not judged to be sensitive] are less than significant once mitigated, saying that none of the cited species represent significant populations or significant portions of regional populations. And yet, the DEIR and Biological Resources Report offer no data to support those claims. Nor, do they offer data that show the local population densities of the cited species that can be compared to regional population densities.

C1i-16

The DEIR notes that the riparian habitats on the Project site will be preserved in open space easements. Those portions of the riparian habitats destroyed by road crossings will be recreated on-site adjacent to the preserved existing habitats. However, the DEIR gives short shrift to the edge effects it acknowledges [e.g. human intrusion, invasive plant species, domestic pets, noise, night light, etc.] pointing to fences and signage and weeding efforts managed by an undetermined manager.

C1i-17

The DEIR does not adequately account for the cumulative effects stemming from the impacts to the Project site. If we take San Diego County as the 'region' or even North San Diego County as the region, we should be looking at the historic extent of coastal sage scrub, southern mixed chaparral, southern coast live oak riparian woodland, coast live oak woodland, southern willow scrub, southern willow riparian woodland, and wetlands within that area compared to what exists today. We should then ask to what extent have these vegetation communities been extirpated and to what extent the remaining examples of those communities have significance. Comparing proposed destruction in one project with destruction that has or will result in a handful of other smaller projects isn't an effective measurement of cumulative effects.

C1i-18

2. Cultural Resources

The DEIR and Cultural Resources Report address historic cultural sites on the Project site individually. They fail to regard the Project site overall in the context of nearby significant Native American village sites along the San Luis Rey River and its tributary, Moosa Creek. The Project site is rich with artifacts and occupation sites, but the proposed mitigation and preservation procedures appear to be piecemeal for a Project as large and transformative as this one.

C1i-19

The grading, by cut and fill techniques, of 4-million cubic yards of earth will jeopardize the opportunity for future study and appreciation of the basic integrity of the cultural significance of the larger area. There are suggestions in previous studies that an as yet undiscovered earlier human habitation of the Project site area, or a separate village from those already known may be present.

There are also concerns about the data recovery program and its methodology. Most of the previous studies of the area are 35 years old and more current studies may be needed to fully understand the significance of the site.

C1i-20

C1i-16 The FEIR conclusions for impacts to sensitive species are based on site-specific surveys for sensitive species as documented in Table 1 of Appendix G of the FEIR. Attachments 9 and 11 of Appendix G document the sensitive plant and wildlife species with the potential to occur on-site, their likelihood of occurrence, and the factual basis for this determination. Significance conclusions consider their occurrence on-site, the suitability of the on-site habitat to support sensitive species, their relative abundance in the region, and the regional abundance of their preferred habitat. As most of the project site (approximately 76 percent) is marginal habitat (agricultural land, disturbed land, currently developed land) and the sensitive biological resource areas would be preserved on-site and off-site in conservation easements, the project would not result in a significant loss of habitat for the studied species. In addition, of the species with the potential to occur on-site, the FEIR demonstrates that a combination of the preservation of habitats suitable for these species, on-site or within draft PAMA lands, in combination with the abundance of species as documented in scientific literature, would result in less than significant sensitive species impacts.

The determination was made using the best available information including the draft North County MSCP which focuses on the preservation of the larger, higher quality habitat blocks that are considered to contain the largest populations of sensitive species, allowing smaller less viable and fragmented habitat areas that support smaller populations of species outside of these core resource areas to be considered for development. The project site is outside of the draft North County MSCP PAMA areas, which are the most important locations for preservation of habitat and species.

The Biological Resources Report relies on the regional MSCP planning efforts within the county and southern California as the basis for the determination of where the highest quality habitats and regionally significant populations of sensitive species occur in relation to the project. For example, under Section 3.2.5 Preserve Components for the PAMA, the Draft North County Plan states, "This concept (PAMA) develops the preferred preserve configuration around large contiguous area of habitat, areas supporting important species populations or habitat areas, and important functional linkages and movement corridors between them." The project is not within a high priority area for habitat conservation.

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	<p>C1i-17 The FEIR, M-BIO-2, requires preparation of a Resource Management Plan (RMP). As detailed in M-BIO-2 (see subchapter 2.5), the RMP shall address site preparation, irrigation system requirements, on-site culvert maintenance to allow for wildlife passage, plant palettes, installation procedure, and describe the maintenance and monitoring program for both the establishment of mitigation areas and the enhancement of mitigation areas per the project conceptual wetland revegetation plan (FEIR Appendix G, Attachment 16) or requirements for habitat selection contained in the conceptual resource management plans (FEIR Appendix G, Attachments 17 and 18).</p> <p>The RMP will include success criteria for the creation, restoration, and/or enhancement of native habitats. In addition, the RMP would be required to achieve the following goals:</p> <ol style="list-style-type: none">1. Preserve and manage the open space lands to the benefit of the flora, fauna, and native ecosystem functions reflected in the natural communities occurring within the RMP land.2. Manage the land for the benefit of sensitive plant and wildlife species and existing natural communities, without substantive efforts to alter or restrict the natural course of habitat development and dynamics.3. Reduce, control, and where feasible, eradicate non-native, invasive flora and/or fauna known to be detrimental to native species and/or the local ecosystem.4. Maintain the character and function of certain agricultural areas within the wetland buffer and open space area. (Refer to MM-BIO-2) <p>Implementation of the RMP will ensure that edge effects would not compromise on-site mitigation.</p>
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	<p>C1i-18 FEIR subchapters 2.5.2.2 and 2.5.4, both clearly state that impacts to coastal sage scrub habitat would be considered significant. Mitigation for coastal sage scrub impacts would still be required at the designated ratio whether or not the draft MSCP/PAMA is approved. The Habitat Loss Permit contains the necessary findings in support of the habitat loss per the NCCP guidelines in the absence of an adopted MSCP document/plan.</p> <p>All impacts to coastal sage scrub are considered significant and require mitigation with or without the MSCP/PAMA per County and Wildlife Agency requirements. While the loss of small stands of CSS contribute to cumulative losses of this habitat type, the NCCP CSS programs focus on the more important task of preserving larger blocks of CSS habitat that have been shown to be more beneficial for the preservation of CSS and the diverse assemblage of organisms supported by this habitat type. In general, the larger the acreage the more significant the patch becomes; however, other factors such as presence of sensitive species may make smaller patches of habitat significant.</p> <p>Cumulative impacts to agricultural and biological resources are addressed in FEIR subchapters 2.4.3 and 2.5.3, respectively. The selected cumulative project area represents those projects surrounding the project site with similar resources, habitats and within the same watershed as a means to analyze potential cumulative loss of these resources. The cumulative impacts analyses were completed in compliance with County Guidelines and the California Environmental Quality Act (CEQA). The FEIR also includes an analysis of consistency with General Plan policies. Refer to subchapter 3.1.4 and Appendix W of the FEIR.</p> <p>C1i-19 The FEIR appropriately analyzed all project impacts together and the FEIR does not piecemeal the project as the comment suggests. Due to the variation between archaeological sites and the CEQA criteria for determining significance, each individual archaeological site must be evaluated for significance individually and, if necessary, mitigation must be developed specifically for each archaeology site. The analysis evaluates the entire site and off-site improvement areas as a whole and, as this comment points out, in the context of the cumulative study area.</p>
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	<p>C1i-19 (cont.)</p> <p>As indicated in the FEIR, the project would preserve all known on-site resources that meet the CEQA significance criteria. The FEIR identifies potentially significant impacts to unknown resources and an off-site site CA-SDI-5072 and identifies mitigation (M-CR-2 and M-CR-3) for those potential impacts. The importance of cultural resources under CEQA is tied to the archeological information the resources have. The proposed mitigation includes curating or, as appropriate, repatriating recovered materials. Also, documentation of the sites would be archived at the South Coastal Information Center (SCIC) that serves to make the information available to future researchers, so that associations with other sites and the overall area can be better addressed. As the proposed preservation and project mitigation preserves the archeological resource information for the future, the project's impacts are considered mitigated to below a level of significance.</p> <p>See responses to comments in Letter C1n for detailed responses to cultural resource issues raised by the VCCPG.</p> <p>C1i-20 The standard methodology of transect spacing was used in archaeological surveys. The archaeologists thoroughly checked bedrock outcrops, cut banks or other exposed soil profiles, and other high-potential areas during the evaluation. No comments have been expressed by the Tribes disagreeing with the methodology that was used.</p>
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<p>3. Hazards, Hazardous Materials, Wildfires The development of the densely packed Project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion in this subchapter of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used.</p> <p>The proposed wastewater recycling facility [WRF] will be using hazardous materials, such as chlorine, in its treatment process. The facility is only 686-feet from the proposed school site and only 250-feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the conclusion that the risks from the use of toxic, hazardous materials are less than significant is overly optimistic, even under carefully controlled circumstances.</p> <p>The WRF will not be built to coincide with the earlier phases, requiring that sewage is trucked off-site for disposal. The same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project? Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.</p> <p>The issues of emergency response and evacuation plans are troublesome for this Project. The Evacuation Plan does not address the most fundamental evacuation issue of the proposed Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed Project. The mobility element roads nearest the Project are West Lilac and Circle R Roads. Both roads were built as 2.2 E two-lane roads to serve a rural community with small, rural populations and the applicant plans no upgrades to these roads. The addition of 5000+ people at the Project site will severely impact both emergency response and evacuation during a crisis event, exacerbating already congested conditions in such circumstances and putting many people at risk.</p> <p>The applicant would further impact evacuation plans by proposing 10 road standard modifications that would lower the classification of the mobility element roads in some cases and lower the design speeds of those roads. With lower design speeds and narrower roadways, the Project will imperil evacuations from Bonsall and Valley Center to the I-15 corridor by existing residents, and impede the prospective residents of the Project at the same time. This kind of impact, played out in scenarios like Bonsall and Valley Center experienced in 2003 and 2007, would severely and significantly put hundreds of people at risk. Further, the Project has but a single evacuation route to the East. That is the easterly section of West Lilac</p>	<p>C1i-21 Significant impacts associated with agricultural adjacency issues are addressed in the FEIR subchapter 2.4. Mitigation measures are required to buffer on-site residential and other uses from off-site agricultural operations which, in some cases, include pesticide usage. The FEIR was revised to direct the reader to the agricultural resources section for 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.</p> <p>C1i-22 As discussed in the FEIR, subchapter 2.7, the risk of accidental release of chlorine gas is less than significant. The multiple safety measures taken include required inspections by multiple agencies; a Risk Management Plan (RMP) and plant design all ensure that the impact of the location and operation of the Water Reclamation Facility (WRF) is less than significant. Any required risk analysis would be done when the plant is designed and the required RMP is prepared.</p> <p>C1i-23 and C1i-24 The commenter stated that emergency responses and evacuations would be severely impacted during a crisis event. For the residents of LHR and the surrounding area, it should be pointed out that the primary requirements of an evacuation plan are to identify evacuation routes and to prepare residents for an emergency event. It is a key document for Incident Command when an emergency event occurs in the area. For preparedness of the residents, there is a key concept in the Plan known as “Ready! Set! Go!”. This is now a national program and focuses on education, awareness, and preparedness for those living in the wildland-urban interface areas. The Plan also requires that the HOA and DSFPD distribute “Ready! Set! Go!” information on a continual basis along with maps showing the evacuation routes, temporary evacuation points, and pre-identified safety zones.</p> <p>In the event of a wildland fire in the area, an immediate tactical planning process by Incident Command is activated along with evacuation and contingency plans. Community evacuation plans will be integrated into the contingency planning process by Incident Command to assist and coordinate evacuation planning for all residents in the area requiring evacuation of part or all residents in the area.</p>
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	<p>C1i-23 and C1i-24 (cont.)</p> <p>In the event a wildfire occurs in the immediate vicinity with little to no time to evacuate, the Incident Command will make a determination on-site if temporary safe refuge of residents would be appropriate or warranted. Temporary Safe Refuge (TSR) is a concept that is utilized when early evacuation is not possible due to the nature and proximity of the fire or the escape route has been compromised. It is not acceptable, however, to plan shelter-in-place for the community; but with a fast-moving wildfire emergency, the Incident Command does have the decision and option that temporary safe refuge in pre-determined safety zones could be an option. The ignition-resistant construction and other fire code requirements in addition to irrigated and well managed park areas does provide more protection and opportunities for this option for residents in this development than do older homes and other developments in the area.</p> <p>There are significant improvements for evacuation procedures for residents in all of San Diego County, e.g., reverse 911. The project meets County codes and ordinances regarding emergency evacuations, including allowable exceptions, which provide mitigations for safe practical effect. Therefore, there is no significant adverse impact associated with the project.</p> <p>The commenter also stated that evacuation plans would be impacted by proposing road standard modifications. As stated above, primary requirement of an evacuation plan is to identify evacuation routes and to prepare residents for an emergency event with education, awareness and preparedness. Also, in the event of a wildfire in the area, tactical decisions by Incident Command will include evacuations based on implementing in phases and on predetermined trigger points, so smaller percentages of the evacuees are on the road at the same time. Trigger points would include ordering evacuations when a wildfire reaches a predetermined trigger point. 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. From a fire perspective and an evacuation of residences from the area, these tactical procedures would be part of an Incident Command contingency plan to assist and coordinate mass evacuation planning for all residents in the area.</p>
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Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. There are no plans to upgrade this road. If an evacuation event is caused by a large wildfire from the west, the ensuing smoke plume will result in a panic evacuation over a single treacherous road.

C1i-24 cont.

The Project has not demonstrated that the project can meet the 5-minute Emergency Response requirement for Fire Services. The proposed solutions of building a fourth fire station in the Deer Springs Fire Protection District [DSFPD] at the Project site do not work from the perspective of jurisdictional issues and fiscal operational cost issues. None of the existing fire stations in the DSFPD meet the 5-minute requirement.

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The Project is proposed for a site in a very high fire hazard severity zone [FHSZ]. Locating a Project of this size and scope in a very high FHSZ is not a smart location that is consistent with preventive land use planning. The DEIR states that failure to meet the standard 100-foot Fuel Modification Zone [FMZ] for significant portions of the Project would be a significant impact. Section 5.4 Fuel Management Zones on page 42 of the FPP states "The project includes a few areas where fuel modification zones are less than 100 feet wide. Based on even a quick scan of Figure 1.6 from Chapter 1 of the DEIR (Attachment H), the more accurate and true statement is: The project includes extensive areas where fuel management zones are less than 100 feet wide. This is a severe design flaw.

C1i-26

Fire Protection Plan (FPP)
The proposed Project FPP does not meet the following basic requirements identified below by Issue Number:

1. Of the three Fire Station site Options proposed by the Applicant, none meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Charter of the DSFPD focuses on providing no greater than 5-minute emergency response time to the ENTIRE DSFPD, of which the proposed LHR Project is a subset.
2. The Applicant states in the FPP that the LHR Project fully complies with the DSFPD Ordinance No. 2010-01, County of San Diego Consolidated Fire Code, and County of San Diego Public and Private Road Standards. *The LHR has factual compliance issues with all of these regulations.*
3. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address either Structure Fires or Emergency Medical Service (EMS).
4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.

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Fuel Modification Zones (FMZ) – The applicant appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100 foot FMZ requirement.

C1i-31

C1i-25 Please see Global Response: Fire and Medical Services.

C1i-26 In San Diego County's Guidelines for Determining Significance and Report Format and Content Requirements for Wildland Fire and Fire Protection states that the FPP is a document that describes the level of fire hazard that would affect or be caused by a proposed development and the methods proposed to minimize that hazard. The FPP also evaluates the consistency of the proposed project with applicable fire protection regulations. In order to minimize hazards and meet fire code requirements, the FPP may include recommendations that involve limitations on future land use on the subject property, building construction standards, vegetation management, access improvements, installation of fire suppression facilities, and other design measures. The FPP must include measures to address the specific location, topography, geology, level of flammable vegetation and climate of the proposed project site. The FPP for the proposed Lilac Hills Ranch development follows the guidelines outlined by the County of San Diego for a FPP.

The project proposes customized fuel modification based on site specific fire behavior modeling and risk assessments as evaluated in the FPP. In these areas, off-site, adjacent land uses and overall fuel densities and terrain justify less than 100 feet of fuel modification zone. Also, the justification is based on adjacent flame lengths and heat intensity. For all locations where less than 100 feet of fuel modification are identified, the project is required to implement mitigation measures, as detailed in FEIR subchapter 2.7, to assure that impacts associated with the reduced FMZs would be less than significant. These mitigation measures would provide fire protection equal to a 100-foot FMZ.

C1i-27 through C1i-30 Detailed responses to these issues are included in responses to comments I51i-2 through I51i-20.

C1i-31 As detailed in Section 4.5 of the FPP, and FEIR subchapter 2.7.2.4 and Capabilities Assessment (pp. 12-13), off-site clearing is one of a number of alternative measures proposed to mitigate for reduced fuel modification zones. Off-site clearing would only be allowed under a recorded easement acquired from adjacent landowners for the purpose of maintaining required fuel modification. There is no off-site clearing proposed; however, if off-site clearing is proposed in the future, the easements must be provided before the project can move forward.

Thus, the proposal amounts to putting a large project with several vulnerable populations into a very high fire hazard severity zone with substandard fuel modification zones and depending on more rigorous construction techniques to restore a margin of fire safety. The question becomes why the applicant hasn't redesigned the Project to allow for standard FMZs throughout the Project? This problem is strained further by uncertain access to the Project site by fire apparatus. That access depends on at least two private roads, for which easement access is uncertain, and the applicant's proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency.

C1i-32

4. Significant Irreversible Environmental Changes Resultant from Project Implementation

The proposed Project [Lilac Hills Ranch] will cause significant, irreversible, and, in most instances, immitigable impacts to the Project site, to the Valley Center and Bonsall communities and their community plans and to the County of San Diego and its General Plan. The Project will require amendments to the General Plan, its principles, policies, and regional land use designations and to the Bonsall and Valley Center Community Plans, or, at least, a severely disfigured interpretation of all of them.

C1i-33

The DEIR focuses on the grading of the Project site, on the use of fuels [energy] to prepare the Project site and manufacture construction materials, on the consumption of construction materials [wood, concrete, asphalt, drywall, etc.], on subsequent energy and natural resource consumption by the eventual residents, and on the amount of time to construct the project.

The movement of over 4-million cubic yards of dirt and rock on the Project site is perhaps the most obvious irreversible impact. Another is the loss of hundreds of acres of productive agricultural land. Another is the loss of significant amounts of biological habitat and the flora and fauna that presently occupy them. The DEIR does not adequately address the cumulative impact of scores of such individual losses caused by multiple projects within the County and the irreversible loss of the majority of native habitats in the aggregation of those individual losses.

C1i-34

Less obvious losses are the changes to the General Plan and related Community Plans that will be required for this Project to be approved. Those changes will dramatically alter the parameters of the General Plan that strive for smart growth. And, if the Project is approved, it will set a precedent that will have severe ramifications across the unincorporated countryside of San Diego County.

D. Chapter 3

1. Water Quality/Hydrology

C1i-32 See response to comment C1i-26.

C1i-33 and C1i-34

The project proposes and will require 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, and (4) amend the Mobility Element to reclassify West Lilac Road and specify the reclassified road segments at Table M-4. (FEIR Subchapter 1.2.1.1.) Such amendment is purely specific to the proposed project. The FEIR frames the General Plan consistency analysis at Subchapter 1.4 under "Environmental Setting," and describes its current land use planning context (current general plan land uses and both community plans). (FEIR, Chapter 1.4.) Subchapter 1.6 describes the General Plan amendment required for approval of the project and that is analyzed by the FEIR. The General Plan Regional Land Use Map is proposed to be amended to remove the existing regional category and land use designation and to redesignate the project area as Village. Then subsequently provides detailed analysis of the physical environmental impacts that may flow from the GPA in Chapters 2.0 and 3.0, as well as providing a detailed policy inconsistency analysis in the Land Use Planning section, subchapter 3.1.4 (See FEIR, Chapter 3.0; Appendix W) of the FEIR.

Thus, the FEIR provides an analysis of the potential physical environmental impacts that would result from project approval and the concomitant amendment of the Regional Land Use Element Map to change the regional land use category from Semi-Rural to Village.

Subchapter 3.1.4.1 of the FEIR provides an analysis of the project's compliance with applicable land use policies and plans, as well as Attachment "A" to Appendix "W." See also Global Response: General Plan Amendment CEQA Impacts Analysis and Appendix W for a thorough analysis of this issue. See also letter C1p for detailed responses to comments related to the project's irreversible impacts.

The DEIR concludes under Issue 1: Water Quality Standards and Requirements in Chapter 3.0 "Environmental Effects Found Not to be Significant" as follows:

"Through these design features, including the use of permeable pavers, the project would not result in the violation of any water quality standards or waste discharge requirements. Impacts associated with this issue would be less than significant."

We strongly disagree with this finding and conclude that there is high likelihood of potentially significant and immitigable impacts.

Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements as represented in figure 3-4, "Off-site Sewer Collection System." This determination is confirmed by Valley Center Municipal Water District [VCMWD] in a letter labeled Attachment A. This finding makes construction of sewer and recycled water pipelines for the Project problematic.

Use of the Lower Moosa Water Reclamation Facility [LMWRF] for a series of alternative sewage solutions has been proposed. The LMWRF was built in 1974 and provides disinfected secondary treatment of reclaimed water only. It has been approved by two agencies to double the LMWRF capacity to 1.0 million gallons/day [MGD] of influent. That capacity is not presently added.

If eventually expanded, likely it would be required to upgrade its treatment to tertiary standards to allow beneficial use of the recycled water on landscaping and golf courses and to prevent degrading the water quality of the San Luis Rey Basin watershed. Current capacity of the LMWRF is 0.5 MGD and it is currently averaging 0.35 MGD of influent. The present ground water percolation pond capacity is 0.44 MGD. At present capacities, LMWRF could accept a maximum of 450 additional equivalent dwelling units [EDU]. However there is some question whether the capacity of the percolation ponds would be allowed to reach the 0.44 MGD limit. Several already pending permit applications, which could reduce the 450 additional EDUs, further complicate matters. Delays for permitting and construction could make the capacity improvements unavailable for some time. Another factor is the limited available space at LMWRF for the expansion.

Analysis of tabular data from the Waste Water Management of Alternatives Study [table 5-1] calls into question the availability of adequate acreage to discharge recycled water beneficially on-site.

It appears that the Hydro Modification Design is relying on exaggerated assumptions for both rainwater harvesting success and the availability of residential landscape areas as permeable surfaces for absorption of water. That same design also reveals the desire to install 23 acres of private roads paved with permeable pavers to permit additional percolation of water into the soil. Such roads may fail under the weight of a Type 1 fire engine.

C1i-35

C1i-36

C1i-37

C1i-38

C1i-39

C1i-35 The comment expresses the opinion of the commenter and does not raise a specific environmental issue within the meaning of CEQA. The FEIR is adequate and fully addresses the water quality impacts associated with the proposed project as subchapter 3.1.3 and the Hydromodification Management Plan (Appendix U3). The impact analysis and significance conclusions presented in the FEIR are based upon and supported by substantial evidence, including the technical analyses provided as appendices to the FEIR. The design for the current Implementing TM (and all future Implementing TMs) will conform to all current SUSMP, hydromodification and drainage attenuation requirements in the County of San Diego. These reports demonstrated that the proposed development has adequate mitigation facilities to address water quality, hydromodification and 100-year peak runoff volume attenuation.

C1i-36 The comment expresses the opinion of the commenter and does not raise a specific environmental issue within the meaning of CEQA. See Global Response: Easements (Covey Lane and Mountain Ridge Roads) included in the introduction to these responses to comments. The additional information requested for routes for sewer and water pipelines is outside the scope of the required analysis. The alternatives for off-site routes for sewer and water pipelines are identified in the Wastewater Management Report (Appendix S of the FEIR).

Where the project proposes to co-locate multiple utility lines, there are combined total 40 feet in width of utility and road easements. As shown in Figures 3-4A through 3-4C of Appendix S of the FEIR there is adequate spacing for all utility pipes within the right-of-way.

C1i-37 It is acknowledged that all the permits and issues listed would need to be addressed by VCMWD to enable the expansion of the Lower Moosa Water Reclamation Facility as a possible wastewater treatment option for the project. If these permits cannot be obtained to the satisfaction of the regulatory agencies then the project would proceed with one of the other methods for treatment and disposal of wastewater as directed by VCMWD. Any expansion at the Lower Moosa Water Reclamation Facility beyond its current capacity would include the addition of tertiary treatment facilities to allow for recycled water use as a means of effluent disposal. As discussed at FEIR Subchapter 3.1.7.2, two options for wastewater treatment for the project would not require increased capacity for the Lower Moosa Water Reclamation Facility as such treatment would occur on-site.

LETTER

RESPONSE

	<p>C1i-37 (cont.) VCMWD is the appropriate agency to provide the permit list and contacts requested in this comment.</p> <p>C1i-38 Table 5-1 is an arithmetic illustration of how the area needed for application of reclaimed water changes depending on the rate of application. VCMWD would ultimately determine how much reclaimed water would be used within the project site and how much would be used elsewhere. We have proposed storage on-site for unused reclaimed water.</p> <p>The recycled water application rates will be in accordance with the County of San Diego guidelines for the appropriate plant material. Turf requires 4 acre-feet per acre per year which is the high-end of the irrigation application scale and ornamental landscaping requires approximately 3 acre-feet per acre per year. The developed areas would include over 111 acres of open space such as parks, slopes, and common open space, all of which would be landscaped. The Specific Plan would guide development throughout the many years needed to construct the project. As such, the detailed information requested would not be available until detailed plans are developed in the future. Recycled water use on the project will conform to all applicable state, federal, and local guidelines relating to possible discharges, if any, to Section 404 waters.</p> <p>C1i-39 The County does not agree that the hydromodification report relies on exaggerated assumptions. As explained at subchapter 3.1.3 of the FEIR, rain water harvesting on residential units is proposed only as a supplement to use of three hydromodification mitigation ponds or detentions basins as the primary means to mitigate impacts for project-related storm water discharges. As presented in the Major SWMP for Lilac Hills Ranch – Implementing TM, Attachment I, the potential total rain barrel volume is 0.2 acre-feet, which is just a fraction of the capacity of the detention basins. If this alternative were utilized, the proposed rain barrels would not be a significant component of the required on-site detention facilities. The impact of a very small fractional decrease in storage volume offset would not have a high likelihood of potentially significant impact. Furthermore, the rain barrels were not modeled into the hydromodification analysis, thus, the calculations presented in the report essentially anticipated a 100 percent hard failure. This is a worst case analysis.</p>
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LETTER

RESPONSE

	<p>C1i-39 (cont.) The project design does not rely on permeable pavers in roadways. The current street design reflects the traditional asphalt concrete black tops. The permeable pavers were only discussed as a potential alternative to the traditional black top pavement. The Implementing TM SWMP, hydromodification, hydrology report and Master TM hydrology report clearly state that these permeable pavers are not being proposed as part of this project. However, it must be clarified that the pavers are not designed to allow storm water to percolate into the soils. Per the typical paver sections presented in the above-mentioned reports, an impermeable liner is to be installed at the bottom of the subbase material with a perforated pipe sloped to drain to the closest storm drain.</p> <p>C1i-40 The current, accurate, and complete specific estimates of impervious surfaces were calculated only for the first 114.9 acres of the Implementing TM in the hydromodification report. The final build-out design for the project site is only at the conceptual planning stage; therefore, any specific estimation or calculation on the impervious areas at project build-out would not be current, accurate, and complete at this stage. Successive Implementing TMs would provide these accurate, complete numbers and required water quality measures would be incorporated into subsequent phases of the project consistent with applicable regulations.</p> <p>The overall project (i.e., Master TM) proposes to conserve approximately 104 acres of natural land and 20.8 acres of agricultural land undisturbed. Further, project design elements include greenbelt buffer areas, agricultural buffer areas, other open space areas, and parks in addition to preserved natural open space. The project proposes all privately maintained roadways on-site conform to the current County of San Diego Private Road standards. These privately maintained roadways would have reduced pavement width to minimize impervious surfaces that satisfies the COS-5.2 requirement to minimize the use of impervious surfaces.</p>
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LETTER

RESPONSE

<p>It is tortured logic to argue that taking green field agricultural and semi rural estate land and introducing a dense urban environment that develops 504 of the 608 acres, adding 83 acres of road and 68 acres of manufactured slopes is consistent with policy COS-5.2 which requires development to minimize the use of impervious surfaces.</p> <p>2. Public Services We are informed that several local public service organizations will be responding to the DEIR within the scope of their responsibility to provide such services. We have spoken to the Valley Center Municipal Water District, Valley Center Pauma Unified School District, Deer Springs Fire Protection District, the San Diego County Sheriff's Department, the Regional Water Quality Control Board, the California Department of Fish and Wildlife, and the U. S. Fish and Wildlife Service. [Five emails to/from agencies are attached]</p> <p>3. Geology and Supplemental Geology Report The review identifies questions regarding the need for blasting that cannot be quantified to determine the amount and length of time needed to do removals and ultimately placement of fills. Silicates will be a potential hazard relative to the AQMD standards.</p> <p>Slope Stability and Remediation describe cut slopes 6.2.1 and fill (manufactured) slopes 6.2.2 in excess of seventy-feet (70-feet) in height. There are no seventy-foot high manufactured slopes existing in this community, which makes these proposed slopes out of character with the community.</p> <p>E. Chapter 4 – Project Alternatives</p> <p>The Lilac Hills Ranch Project Alternatives from Chapter 4.0 of the DEIR are below:</p> <ol style="list-style-type: none"> 1. No Project/No Development Alternative 2. No Project / Existing Legal Lot Alternative (49 EDU + no commercial) 3. General Plan Consistent Alternative (110 EDU + no commercial) 4. Reduced Footprint Alternative (1251 EDU + 6 acres of commercial) 5. Reduced Intensity Alternative (881 EDU + 5.6 acres of commercial) 6. 2.2C (Hybrid) Alternative (1365 EDU + 15.3 acres of commercial) <p>The County's Project Alternatives Analysis in Chapter 4 of the DEIR is grossly defective in meeting CEQA requirements in five areas that are summarized below:</p> <ol style="list-style-type: none"> 1. The DEIR Objectives against which the Alternatives are judged for Environmental Impacts are biased and should be changed to equitable objectives, from which compliance against can be fairly measured. 2. The Project does not meet its own Objectives, when fairly assessed. 3. There is a valid offsite alternative – the Downtown Escondido Specific Plan 	<p>C1i-40</p> <p>C1i-41</p> <p>C1i-42</p> <p>C1i-43</p> <p>C1i-44</p> <p>C1i-45</p> <p>C1i-46</p> <p>C1i-41 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.</p> <p>C1i-42 and C1i-43 The project site contains several existing slopes exceeding 70 feet in height already. All manufactured slopes over 50 feet in height are designed with benches every 40 feet. No impacts are expected to occur.</p> <p>C1i-44 through C1i-50 The majority of this comment provides factual background information, but does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. With respect to the reference that the Downtown Escondido Specific Plan would be an environmentally superior alternative, please see response to comments C1s-11 and C1s-12 (VCCPG - Alternatives 2013 letter).</p>
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EXECUTIVE SUMMARY 11

- Area (SPA) that needs to be included as an Alternative.
4. The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives. These three "Alternatives" are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis. [see table 1]
 5. The Alternatives were not fairly assessed in the DEIR by the Applicant.
 6. When all eight Alternatives are fairly assessed, the Downtown Escondido SPA meets more Objectives than the Project or any Alternatives.

C1i-46
cont.

C1i-47

C1i-48

C1i-49

Table 1 -Scant Attributes of 3 Alternates Provided

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

* Table 4-1 from DEIR Chapter 4 Project Alternatives has the indicated arithmetic errors

sq. ft. = Square Feet
HOA = Homeowner's Association

Table 2, below, rates scoring of Alternatives against the Applicant's biased eight Objectives.

C1i-50

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

C1i-50 cont.

Clearly, the least Environmental Impact, even to these biased Objectives, is shown in Table 2 to be the Downtown Escondido SPA Alternative.

More importantly, the General Plan alternative must be properly considered by the applicants and County, rather than focus their attention strictly within the boundaries of the Project. Apart from the time and money already spent developing the General Plan [12 years and \$19.6 million], it was designed as a plan for the entirety of the County's unincorporated area while being mindful of the incorporated cities as well. The Lilac Hills Ranch Project is only a single piece of a much larger puzzle.

C1i-51

To study this "puzzle piece" is NOT to study the General Plan alternative. This "half-study" misses the underlying logic of the new County General Plan which is, according to the lengthy introduction to the GP, to achieve "sustainable development" with a two-part strategy called Smart Growth.

- I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley.

C1i-51 The General Plan Consistency Alternative is considered among the project's reasonable range of alternatives. As discussed in subchapter 4.4 of the FEIR, development at the existing General Plan densities would not meet most of the other project objectives. It would not allow for a walkable community, would not include any commercial/retail services, and would not provide for a diverse type of housing, all of which are achieved in the Village-style design of the project. The FEIR does consider development at General Plan densities, as described in subchapter 4.4, Analysis of the General Plan Consistent Alternative. The FEIR concludes that the General Plan Consistency Alternative would result in fewer impacts to agricultural impacts as compared to the project.

II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife among other functions.

The plan works ONLY when its two interdependent parts work together.

The Lilac Hills Ranch Project undermines both aspects of this strategy. The General Plan alternative implements both aspects of this strategy. The only acceptable "study" of the General Plan Alternative is to study it in its entirety. The superior solution will be clear.

C1i-51
cont.

F. Specific Plan

The comments on the Specific Plan include several major concerns:

1. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.

C1i-52

2. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure.

C1i-53

3. Compliance with the General Plan. The Project's Specific Plan threatens to 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 require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. 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. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.

C1i-54

4. Services and Infrastructure - Water, Schools, Fire, 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

C1i-55

C1i-52 Refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this issue.

C1i-53 As noted in the FEIR subchapter 2.3, Traffic, road improvements on- and off-site are required to ensure that local roads operate at LOS D or better at project build-out. The road improvements would be paid for by the project applicant. Cumulative traffic impacts would be mitigated through payment of TIF, which is specifically used to pay for road improvements.

C1i-54 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 an environmental issue, no further response is required. See also response to comment C1i-3 above and Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.

C1i-55 The project would provide all necessary public infrastructure, including water, sewer, fire, and 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.

The two sites designated as "Village" by the Valley Center Community Plan pose many constraints and disadvantages relative to the location of the proposed project. The two Village sites designated by the Community Plan are located substantially further from regional facilities and, therefore, development in these locations would likely result in greater VMT and in turn, greater operational GHG emissions. Additionally, the intensity of proposed use within the Village sites would likely result in significant traffic impacts to local roadways. Both Villages are located adjacent to Valley Center Road. Pursuant to the County General Plan FEIR, Table 2.15-21, all of the segments of Valley Center Road near the Villages (from Sunday Drive to Paradise Creek Road) would operate at an LOS E or F (failing) at build-out.

LETTER

RESPONSE

<p>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.</p> <p>The 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 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 not at the outer edge of the community as this Project proposes, but at the Valley Center core.</p> <p>5. LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “expected to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.</p> <p>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 conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Valley Center community, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Valley Center community and the zoning and land use patterns within Valley Center are consistent with that model. The same is true for the Bonsall community. The proposed addition of the LHR Project in the western portion of the Valley Center community flouts the intention of 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.</p> <p>6. Agriculture— The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. Avocado,</p>		<p>C1i-55 (cont.) Only one segment of Valley Center Road (Miller Road to Indian Creek Road) would be permitted to operate at an LOS F at build-out, pursuant the General Plan Mobility Element Network Appendix for Valley Center. Therefore, improvements would be necessary to increase capacity to local roadways to serve the two Village sites in the Valley Center Community Plan, which would likely result in other significant impacts (biological, cultural, etc.). Thereby, this alternative site location would not reduce any traffic – or likely other - impacts associated with the project.</p> <p>Please also refer to Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.</p> <p>C1i-56 General Plan Policy LU-1.2 specifically guides the development of new villages. LU-1.2 defines leapfrog development and establishes criteria by which any new village will be judged. It requires that any proposal for a new village be consistent with the Community Development Model, provide all necessary infrastructure, and consistency with LEED-ND or equivalent. Lilac Hills Ranch meets these criteria as explained in Global Response: Project Consistency with General Plan Policy LU-1.2. See also response C1i-3 above.</p> <p>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.</p> <p>General Plan Policy LU-1.2 specifically guides the development of new villages. LU-1.2 defines leapfrog development and establishes criteria by which any new village will be judged. It requires that any proposal for a new village be consistent with the Community Development Model, provide all necessary infrastructure, and consistency with LEED-ND or equivalent. Lilac Hills Ranch meets these criteria as explained in Global Response: Project Consistency with General Plan Policy LU-1.2.</p>
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LETTER

RESPONSE

citrus, cactus 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 individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the Project at the planned site would greatly damage many currently productive and successful agricultural operations.

C1i-57 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. They 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-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.

C1i-58

In addition, after criticizing three 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 rather than a plan that defines their intentions.

C1i-59

There are many other concerns addressed in the Specific Plan comment document. They range from the size and type of parks in the Project to the Fire Protection Plan, from the Water Reclamation Facility to open space and conservation policies, from V and D special area regulations to circulation elements. There are too many to reasonably relate in this summary.

C1i-57 The property has not been set aside for agriculture. The property is currently designated as Semi-Rural, which is intended for lower-density residential neighborhoods, recreation areas, agricultural operations, and related commercial uses that support rural communities. 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. (See subchapter 2.4.1.2 of the FEIR.)

C1i-58 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 an environmental issue, no further response is required. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2 and Appendix W.

C1i-59 The Specific Plan meets state requirements which include a text and "diagram" that specifies the distribution, location, and extent of all land uses, public and private infrastructure, and standards and criteria by which development will proceed. The Specific Plan meets all these requirements. Flexibility is allowed to ensure that the Specific Plan will stand the test of time. Within the General Plan, Policy LU-1.8 allows flexibility in design when approved subject to a Major Use Permit or Specific Plan.

For detailed responses to these issues, please see responses to comments to the multiple letters submitted by the VCCPG.