

Letter C1j

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)
GP CONSISTENCY ANALYSIS 9

GENERAL PLAN INCONSISTENCY

Introduction:

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.

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.

Internal consistency of all County General Plans in California is required 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.

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 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

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As detailed in appendix W of the FEIR, the project is consistent with the General Plan. See also, Global Response for General Plan Consistency Analysis and LU-1.2 for a thorough discussion related to this topic.

The FEIR provides a thorough and analysis of all potential impacts which are clearly disclosed in Table S-1.

This letter primarily duplicates the comments within the letter submitted by Kevin Johnson, on behalf of the Heart of Valley Center, dated August 13, 2013, (identified as Letter O3e). Therefore, where relevant, response to comments in comment letter O3-e, are referenced as responsive to the comments herein.

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 county-wide 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.

I. The California Environmental Quality Act (CEQA) requires a General Plan consistency analysis and supportable conclusions. How can the DEIR conclude that planning impacts are 'insignificant' without these analyses?

The DEIR fails to disclose the extent to which this SP/GPA is inconsistent with the County's planning documents. Land use impacts, far from "insignificant" are broad and fundamental. Amendments necessary to accommodate this SP/GPA would require rejecting the GP's foundational vision of Smart Growth and eliminating the many GP Policies that support it.

It is not the intention of the San Diego General Plan to drop "new villages" into semi-rural and rural areas. To the contrary, the County General Plan is rooted in its "Smart Growth" intention. Smart Growth is a two-sided concept. On the one hand Smart Growth locates future development in areas where infrastructure is established; AND on the other hand, Smart Growth also retains or enhances the County's rural character, economy, environmental resources, and unique communities. These are integrated, co-dependent concepts. They work together.

The proposal to plop a dense from-scratch 608-acre Village of 5000 people into several thousand acres of infrastructure-lacking Semi-Rural and Rural land is inconsistent with the County's commitment to "sustainable development." This foundational concept is described at length in the introduction to the County General Plan; and it is expressed across the web of interdependent GP Guiding Principles,

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C1j-2 See response to comment O3e-4.

<p>Goals and Policies that have been put in place to bring about the County's Smart Growth Vision. To reject this Vision now will, in essence, require an entirely new County General Plan.</p> <p>II. Paramount among the project's GP inconsistencies is its failure to comply with Land Use Goal 1 (LU-1) and Policy LU1-2</p> <p>Consistency with Land Use Goal 1 (LU-1) and with Policy 1.2 (LU 1.2) is especially crucial for this project's approval. These speak directly to the requirements for establishing NEW villages in San Diego County. They emphasize the primacy of the Land Use Element and the Community Development Model, and the prohibition of Leapfrog Development.</p> <p><i>Land Use Goal 1: Primacy of the Land Use Element. A land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories.</i></p> <p><i>Land Use Policy 1.2: Leapfrog Development. Prohibit leapfrog development which is inconsistent with the <u>Community Development Model</u>. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the <u>LEED Neighborhood Development Certification (LEED ND)</u> or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established villages or outside established water and sewer service boundaries. (See applicable community plan for possible relevant policies.)</i></p> <p>The DEIR for this SP/GPA asserts that the project is consistent with GP Policy LU 1.2. But, this is not the case. The SP/GPA fails in the most fundamental ways to respect the County's commitment to sustainable development.</p> <p>A. The project is inconsistent with the GP Community Development Model, B. The project is inconsistent with LEED ND standards, C. The project is also inconsistent with the 3rd requirement for waiving the prohibition on leapfrog development which is to provide necessary services and facilities: 1) Ten (10) modifications to the County road standards REDUCE capacities to sub-standard levels 2) Traffic impacts are significant and deemed unmitigatable by the applicant. 3) The project fails to meet 5 minute response time for Fire and Emergency Medical Services.</p> <p>The project fails to present a legal and viable point design for sewage and waste water treatment. To elaborate:</p> <p>A. The Accretive SP/GPA is Inconsistent with the GP Community Development Model</p>	<p>C1j-2 cont.</p> <p>C1j-3 C1j-3 See response to comment O3e-5</p> <p>C1j-4 C1j-4 See response to comment O3e-5.</p> <p>C1j-5 C1j-5 See response to comment O3e-6.</p>
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The proposal is by definition inconsistent with the Community Development Model because consistency can be achieved only by amending the General Plan to fit the project. The General Plan states (San Diego County General Plan: Land Use Framework; Community Development Model, p.3-6): *"The Community Development Model directs the highest intensities and greatest mix of new uses to Village areas, while directing lower-intensity uses such as estate-style residential lots and agricultural and agricultural operations to Semi-Rural areas To facilitate a regional perspective the Regional Categories of Village, Semi-Rural and Rural Lands have been applied to all privately-owned lands ..."*

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First, as the above statement in the County General Plan makes clear, the Community Development Model is *not* a moveable abstract concept. If this were true then Village "puzzle pieces" could be dropped into Semi-Rural and Rural lands anywhere in the County and pronounced consistent with the Community Development Model.

Rather, the Community Development Model reflects a complex of planning principles and ideas that are expressed through the whole system of the General Plan's Regional Categories. Amending a Regional Category, therefore, requires also amending the network of planning concepts that the category is expressing, for example:

1. The General Plan states (pp.3-7), *"Village areas function as the center of community planning areas and contain the highest population and development densities. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit."*
2. The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This SP/GPA proposes to plo p a Village into the middle of an area that the Community Development Model designates for Semi-Rural and Rural development. This action requires AMENDING the Community Development Model. Instead, with no discussion or analysis, the SP/GPA and the DEIR all assert that consistency with the Community Development model is achieved with a simply change to the Land Use map.
3. Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model **requires** a "feathering" of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth. The Accretive SP/GPA is inconsistent with the concept of feathering which is reflected properly in the pattern of land use designations in Valley Center's central valley.
4. This SP/GPA is located many miles from areas that the Community Development Model designates for Village development: miles from employment centers, shopping, entertainment, medical services, and civic organizations and activities.

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C1j-6 See response to comment O3e-6.

C1j-7 See response to comment O3e-7.

C1j-8 See response to comment O3e-8.

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<p>5. As for infrastructure, there are few existing roads in the area. They are built and planned to service Semi-Rural and Rural development, as in the current General and Community Plans. Despite proposing intense Village development, the proponents also propose to retain or reduce capacities of these roads. Water infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service.</p>	<p>C1j-9</p>	<p>C1j-9 See response to comment O3e-9.</p>
<p>6. The intent of the Community Development Model is to intensify development in existing Villages -- not to create NEW Villages through the destruction of Semi-Rural and Rural lands. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed use core to meet the Semi-Rural designations. Twenty-five percent (25%) of the community's future development is now planned for the "Village" area in the center of the Valley Center Planning Area, at the community's traditional "crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place.</p>	<p>C1j-10</p>	<p>C1j-10 See response to comment O3e-10.</p>
<p>7. A key component of including a Community Development Model in the General Plan with "integrity" was to create a framework for future growth. The DEIR completely ignores this concept by concluding that the project would not be growth inducing. This conclusion is in complete contradiction to the General Plan which identifies existing villages as the hubs for growth. Additionally, the County has a long track record of approving General Plan Amendments that increase density using the adjacent properties as justification. The DEIR claims that this would not occur, but history has proven otherwise.</p>	<p>C1j-11</p>	<p>C1j-11 See response to comment O3e-11</p>
<p>8. The DEIR refers to the Property Specific Request (PSR) General Plan Amendment process that was directed by the Board and claims that the project is not growth inducing. Presumably the PSR/GPA is inducing the growth? This suggestion is misleading. The outcome of the PSR/GPA remains to be seen. Approval is not a foregone conclusion and processing will be lengthy. More likely is that approval of the Accretive project would usher approval of the PSR/GPA in Valley Center, thus inducing unplanned growth of this area.</p>	<p>C1j-12</p>	<p>C1j-12 See response to comment O3e-12.</p>
<p>9. However, growth inducement wouldn't stop there. Even IF the PSRs in Valley Center, are approved the lands surrounding the proposed project (and some lands which the proposed project surrounds) would still be designated at lower semi-rural densities than the village densities proposed for the Accretive SP/GPA. Into the future, these land owners will continue to seek similar treatment to that of their neighbor and based on the County's track record, they will receive it.</p>	<p>C1j-13</p>	<p>C1j-13 See response to comment O3e-13.</p>
<p>Second, the project design itself also defies the GP principles, goals and policies for Village development, and for Village expansion, which the Community Development Model reflects.</p>	<p>C1j-14</p>	<p>C1j-14 See response to comment O3e-14.</p>
<p>1. The 608-acre project site, only a portion of which is actually owned by the applicant, sprawls 2 miles N-S, and 2 miles E-W across several thousand acres, largely in active agriculture. These surrounding acres are owned by people</p>		

whose dreams and ambitions for their rural properties are in accord with the Community Development Model's Regional Category assignment: Semi-Rural and Rural.

- 2. The sprawling site creates some 8 miles of edge effects that will threaten surrounding agriculture, horticulture and animal husbandry that the GP Community Development Model protects by designating this area for Semi-Rural and Rural development. This sprawling shape also increases the likelihood that the proposed project will be growth inducing as previously mentioned.
- 3. With 1746 units and 90,000 SF of commercial on 608-acres, there is insufficient land available for "feathering" residential densities as the Community Development Model intends and describes.
- 4. The site requires 3 separate commercial nodes to support the "walk-able" claim. It is more than a stretch to characterize the project as a "walk-able Village" when it is, in fact three circles of dense housing. Two of them are at least a mile from what the Community Development Model would characterize as Village amenities. The LEED ND standard for "walking distance" is ½ mile, the GP also cites ½ mile (GP, p.3-8).
- 5. This is not the "walk-able" compact Village it pretends to be. The fake Town Center is more than one and a half miles from the ½ mile standard required by LEED ND and cited in the General Plan.
- 6. The proximity of Rural Lands to the project presents wildfire threats which the applicant's Fire Protection and Evacuation Plans recognize but fail to adequately mitigate. In addition to wildfire the Accretive project adds the additional hazards of Urban Multi Story Structure Fires and nearly two orders of magnitudes increased volume and complexity of Emergency Medical Services (EMS). The Accretive Fire Protection Plan barely mentions the Structures and EMS hazard potential, let alone any mitigation plans. The Deer Springs Fire Protection District (DSFPD) has gone on the record three times (6/12/2012, 3/5/2013 and August 7, 2013 stating that DSFPD has major issues with the Project as proposed. Accretive has glossed over these issues raised by a Public Safety agency and the County has allowed the Project to proceed in the General Plan Amendment process.

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B. The Accretive SP/GPA is Inconsistent with LEED Neighborhood Development Certification standards

Compliance with LEED Neighborhood Development Certification standards is a second critical requirement for this project. Without analyses required by CEQA, the DEIR ASSERTS compliance with LEED-Neighborhood Development requirements, perhaps because analysis reveals that the Accretive SP/GPA so woefully fails to meet them.

But , unsubstantiated assertion fails to satisfy CEQA. The County must comprehensively address the numerous and exacting requirements of LEED Neighborhood Development Certification. If the County is applying not LEED ND but an

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C1j-15 See response to comment O3e-15.

C1j-16 See response to comment O3e-16.

C1j-17 See response to comment O3e-17.

C1j-18 See response to comment O3e-18.

C1j-19 See response to comments O3e-19 through O3e-22.

“equivalent standard” as policy LU1-2 allows, the analysis should name the standard and show how it is equivalent.

To date we believe there is no recognized equivalent to LEED ND, and if there were a recognized equivalent it would be, well, equivalent. Despite the insistence of a few PDS staffers who will remain nameless that “there might be an equivalent standard that does NOT require a “Smart” location, in the English language the word “equivalent” does mean “equal.”

At the end of this document we have included key excerpts from the booklet, **LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT**. However, we encourage thoughtful readers to review the entire 70-page booklet where these exacting standards are discussed and illustrated in intricate detail. The booklet is published by the U.S. Green Building Council and is available on their website.

As the booklet makes clear: For LEED ND Certification a few location, conservation and design criteria are mandatory. This means that, regardless of how many “points” are accumulated for “green” amenities, LEED ND Certification cannot be achieved without meeting a few essential standards in particular categories.

We await the County’s analysis of the full complement of standards for LEED ND Certification. GP LU1-2 is clear in its intention that the Accretive SP/GPA must comply with all standards that are required for LEED-Neighborhood Development Certification. However, in order to provide the reader with a sense of how comprehensive and detailed the LEED ND standards are, we have included below a list of the mandatory requirements for the two areas where our comments are focused this time -- Smart Location and Neighborhood Pattern and Design. We will address some of these in our comments below.

(More detail is available below in the attachment, *SELECTED BRIEF EXCERPTS FROM LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT* or from the original 70-page document on the U.S. Green Building Council website.)

SMART LOCATION and LINKAGE

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Smart Location
- Prerequisite 2 Imperiled Species and Ecological Communities
- Prerequisite 3 Wetland and Water Body Conservation
- Prerequisite 4 Agricultural Land Conservation
- Prerequisite 5 Floodplain Avoidance

NEIGHBORHOOD PATTERN AND DESIGN

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Walkable Streets

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Prerequisite 2 Compact Development
 Prerequisite 3 Connected and Open Community

From our review of the LEED ND requirements, we conclude that Accretive's SP/GPA fails to meet fundamental requirements for LEED ND Certification for the following reasons:

- 1) **The site is not a "Smart Location."** The EIR concludes that the project is consistent with LEED-ND but completely overlooks its mandatory site selection requirements. However, the EIR does not address how this aspect of LEED-ND can simply be overlooked when the program was specifically designed to "place emphasis" on site selection. A fundamental premise of Smart Growth is to lower automobile dependency as compared to average Development. The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip. The SANDAG average miles/trip for the unincorporated San Diego County is about 13 miles/trip which is why the region is directing growth to the incorporated cities and existing villages. Accretive is proposing an automobile based urban sprawl community that even with exceedingly high and unsubstantiated internal trip rates is 47% higher than the San Diego County average (8.52/5.8) trip distance.
- 2) **The site is too large (exceeds the 320-acre maximum size).** This maximum area is based on critical factors such as providing the appropriate density of services and neighborhoods within a compact community and achieving walkability. The EIR fails to address how the project is still in compliance with the LEED-ND program when it exceeds a standard that was determined by the "core committee's research."
- 3) **The proposed SP/GPA fails to meet LEED ND standards for a "walkable" neighborhood:** This issue brings to light another more fundamental one with much of the EIR's documentation. Throughout the document there is the assertion or suggestion that the proposed project will be "walkable". However, the only evidence that is provided are three circles on a map to suggest that someone could walk to someplace within that circle if they wanted to. This is not the definition of a walkable community. The LEED-ND standards were developed through the research of a core committee which suggests that a walkable neighborhood is no more than 320 acres and all services, civic uses, employment, and high density housing are contained within that 320 acres. Describing the proposed project as walkable is unsubstantiated and misleading. Further it has likely undermined technical analyses that rely on the premise that the project is walkable and take credit for that. These include the traffic, air quality, and greenhouse gas emissions analyses.
- 4) **It is neither an infill site nor a new development proximate to diverse uses or adjacent to connected and previously developed land. It is sprawl plopped into a functioning agricultural area, with no existing infrastructure.** The objectives of the LEED-ND program are clearly compatible and in alignment with the guiding principles of the County of San Diego's General Plan and with the siting of "new green neighborhoods." As a result, it was integrated into the

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C1j-20 See response to comments O3e-19 through O3e-22.

C1j-21 See response to comments O3e-19 through O3e-22.

C1j-22 See response to comment O3e-23.

<p>Leapfrog policy of the General Plan. Any proposed deviation from LEED-ND, such as ignoring siting criteria, size restrictions, and density guidelines, should be evaluated in this context.</p> <p>5) The plan does not locate all its residential uses within ½ mile of its “CENTER.” It adds suburban sprawl up to one and a half-miles beyond the one commercial area that is large enough to qualify as a LEED-ND compliant Town Center.</p> <p>6) Because a site design is not available for the Town Center area we have no way of knowing whether this area itself complies with LEED-ND standards. The Specific Plan claims compliance, but this claim is not substantiated or shown.</p> <p>7) The site is not served by existing water infrastructure that is adequate to serve urban density. Water infrastructure is designed for agricultural users and needs significant revision for high density Urban uses. There is no wastewater infrastructure.</p> <p>8) No water or wastewater service is planned to serve urban development of this area. Arguably the site is within a legally adopted, publicly owned water and wastewater service area. However, if “planned service” means that the current General Plan and the VCMWD’s own plans currently call for expansion of the infrastructure required for a project such as this (which they do not!), it does not meet this alternative, either. If it means only that a district with those powers exists and encompasses the Project site, then the Project must provide new water and wastewater infrastructure for the project. But it cannot do so because there are no easements the Project controls to establish such service.</p> <p>9) The Project description itself demonstrates that the SP/GPA cannot satisfy ANY of the 3 OPTIONS for fulfilling the Smart Location REQUIREMENT:</p> <ul style="list-style-type: none"> a. It is not an Infill Project b. It is not an Adjacent Site with Connectivity (does NOT have is at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project) boundary, that is adjacent to previous development c. The site is not designed as a Transit Corridor or Route with Adequate Transit Service. The only mass transit is two bus routes located 4 miles north of the Project which run the circuit of the 4 Indian Casinos on SR-76. d. None of the LEED ND significant public transit service requirements are met by the proposed circulation system. (e.g. at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1). e. The only transit mentioned by Specific Plan and/or DEIR is that NCTD <u>might consider a</u> bus stop serving part of the project. This is inadequate. 	<p>C1j-22 cont.</p> <p>C1j-23</p> <p>C1j-24</p> <p>C1j-25</p> <p>C1j-26</p> <p>C1j-23 See response to comment O3e-24.</p> <p>C1j-24 See response to comment O3e-24.</p> <p>C1j-25 See response to comments O3e-25 and O3e-26.</p> <p>C1j-26 See response to comment O3e-27.</p>
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C. The Accretive SP/GPA fails to provide necessary services and facilities for the intense urbanization being proposed.

1.) ROADS. Traffic impacts are significant and the applicant has proposed no acceptable mitigation measures. he applicant's request for ten (10) modifications to the County road standards will actually REDUCE road capacities to sub-standard levels. Accretive Investment Group proposes Village development of a rural area. But the applicant **does not propose Village capacity roads that are necessary to accommodate the traffic that will be generated by their Village project.** Incongruently, and not disclosed openly in the SP or the DEIR, the applicant proposes ten (10) modifications to the County Road Standards that will *reduce capacities* of roads that were planned, in the first place, to accommodate Rural and Semi-Rural residential development that GP Principles and the land use designation that reflects them have intended for this area.

One purpose of the General Plan Mobility Element and the County Road Standards is to specify road standards and automobile capacities that are necessary to serve surrounding land uses throughout the County. Land Use and Mobility Elements are tightly coordinated. Village-capacity roads are specified as necessary to serve Village land uses. Presumably decision makers will agree that road capacity standards set by the County GP Element and the County Road Standards are "necessary" standards).

However, Accretive Investment Group proposes to compromise standards that are employed uniformly across the County in order to win for themselves entitlements to urbanize land uses -- without responsibility for urbanizing road capacities. Specifically, they propose to add 20,000 Average Daily Trips to Mobility Element roads, and to pass the real costs of improving these roads on to the taxpayers. Further, they are finagling "consistency" with County planning standards pretty much across the board not by complying with them, but by relaxing them.

For example, their proposal is to **DOWNGRADE** West Lilac Road from its current Class 2.2C to a reduced-capacity Class 2.2F. And then, they further propose that two segments of West Lilac Road and one segment of Old Highway 395, which will operate at unacceptable Levels of Service E and F as a result of their new "Village" be sanctioned as official "exceptions" to the County standard for minimum Level of Service. TIF fees of approximately \$5Million are utterly inadequate to afford the road reconstruction necessary to service this development's traffic. The Valley Center Road widening five years ago cost in excess of \$50 Million. Road improvements in already-urban places are expensive.

In remote places road improvement costs are enough to kill projects. No doubt recognizing this problem, the proponents themselves argue *against* improving roads to capacities that are necessary. They say to do so:

- is too difficult and costly
- will require rights-of-way that may be unobtainable

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- will be time consuming to construct
- will be disruptive to off-site property owners
- will face opposition from existing neighbors
- will require condemnation of right-of-way
- will impact biological open space.

These are, of course, the exact reasons why the San Diego General Plan and LEED Neighborhood Development both direct urban development away from undeveloped sites like this one into areas where necessities and amenities required for urban dwellers are already met. You'll recognize these points in the review of General Plan and Community Plan policies that follows.

Once again we must acknowledge that these applicants are not envisioning or proposing an SP/GPA to implement the County's widely- recognized and well-admired 30-year plans for genuinely-sustainable growth. This would be the right approach. To engender this sort of cooperation is also the intended outcome of the County's substantial and ongoing investment of public funds in planning efforts and planning activities.

To the contrary, this project hijacks the language of sustainability to push through a proposal which, if approved, will disintegrate San Diego's effort to lead the nation in this area. This project is NOT "sustainable" development. This SP/GPA requires an array of *exemptions* from the interdependent planning principles, goals, policies and standards that the County has put in place in order to achieve its Vision for sustainable development. (Why invest public funds in planning, we ask, if the next step is to invest more public funds in a "review" that ignores the plan?)

This SP/GPA will add 5000 urban residents to country roads while *reducing* road widths, *reducing* road design speeds and *ignoring other standards* established for safe, efficient transportation. The proposal:

- Fails to provide necessary services and facilities
- Is inconsistent with GP premises that development will pay for itself;
- Is inconsistent with the GP minimum standard for LOS D on County roads;
- Compromises the safety, comfort and quality of life of prospective residents as well as all the other residents of Valley Center who depend on these Mobility Element roads.

For the Accretive project proponents to be angling for approval to shirk necessary County road standards while at the same time claiming to provide necessary services for this intensely urbanized Village project is a disingenuous contradiction. Sanctioning these exemptions would create significant long term SAFETY and liability issues for the County of San Diego.

3.) **ROADS.** Accretive does not have legal right of way to build most of the indicated off-site road improvements.

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C1j-28 Please refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads). See also Off-Site Improvements - Environmental Analysis and Easement Summary Table.

See also response to comment O3e-31.

4.) **ROADS.** Additionally, in order to meet the County Road Standards, two out of four secondary access intersections (Covey Lane and Mountain Ridge) with public roads will require the use of County prescriptive rights (for continual brush clearance) and eminent domain (to secure land from unwilling property owners). Accretive Investments has filed Sight Distance Analyses on these two intersections that confirm the above assertion.

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5.) **RESPONSE TIME.** The SP/GPA fails to meet 5 minute response time for Fire and Emergency Medical Services The Deer Springs Fire Protection District has commented in writing that none of the proposed options listed in the Specific Plan and Fire Protection Plan are feasible solutions for the District to meet the 5 minute emergency response requirement for Lilac Hills Ranch.

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C1j-29 See response to comment O3e-32.

6.) **WASTEWATER TREATMENT.** The project fails to present a legal and viable point (site location and sewage and waste water treatment functional description) design for sewage and waste water treatment. The preferred option listed by the applicant lacks legal right of way for offsite sewer and recycled water pipelines.

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C1j-30 See response to comment O3e-33.

How can the DEIR for this project claim otherwise?

III. The Accretive S/GPA is inconsistent with the Purpose, Intent and Guiding Principles of the County General Plan.

Above we have highlighted the most fundamental and egregious flaws in both the GPA/SP and the DEIR. This should have been the role of the county staff in shepherding this Project. The community and general public should not be required to perform analyses necessary to identify this project's inconsistencies with CEQA and with County General and Community Plans, and CEQA. Citing these oversights should be sufficient. However, we are faced with a dilemma: to be as complete as possible or let significant matters get away without analysis.

C1j-31

C1j-31 and C1j-32
See response to comment O3e-34.

Chapter 3 of the DEIR purports to be analysis of issues which, it concludes, have No Significant Impact. Pages 3-56 through 3-65 set out a few GP Land Use provisions that are applicable to the Accretive Project. However, most relevant GP Goals and Policies are missing. After NOT analyzing any inconsistencies with the many omitted Goals and Policies, the DEIR does two clever things: It refers the reader back to the SP for more discussion of GP compliance (which is non-existent or equally skimpy); and it takes the giant illogical leap, with NO ANALYSIS whatsoever, to conclude that merely by adopting a different Land Use Map, all inconsistencies disappear.

Our comments below highlight a few (due to time and space constraints) of the MANY inconsistencies and issues with the County General Plan that this project has failed to remedy or resolve,

A. Purpose of the General Plan. Chapter 1 of the General Plan contains in its Introduction and Overview an array of directives that the applicant, the applicant's consultants and the DPS staff have all ignored.

C1j-32

The statements that follow, and many others that appear on several hundred pages of the County General Plan, reflect what many citizens believe is a social contract between San Diego County government and the people. To overlook these declarations in the review of this project would be a gross violation of the public trust. Here are a few ...

(p1-4.)

1. The General Plan must be referred to in its entirety, including separately bound portions (such as community plans). While the GP is internally consistent, some issues are addressed through multiple policies and some receive refined and more detailed direction in Community Plans (p. 1-4.)

(p1-5)

*1.) Policies cannot be applied independently (p1-5).
2.) If you are a SD County resident or property owner, the GP indicates the general types of uses that are permitted around your home and changes that may affect your neighborhood, and the policies the County will use to evaluate development applications that might affect you or your neighbors. The Plan also informs you regarding how the County plans to improve mobility infrastructure, continue to provide adequate parks, schools, police, fire, and other public services, protect valued open spaces and environmental resources, and ...*

3.) Future development decisions must be consistent with the Plan.

4.) The essence of the Plan lies in its goals, policies, and implementation programs.

5.) Policies provide guidance to assist the County as it makes decisions relating to each goal and indicates a commitment by the County to a particular course of action.

C1j-32
cont.

B. General Plan Guiding Principles. The General Plan's Guiding Principles also are more than empty words that are subject to manipulative and self-serving interpretation. These Guiding Principles – for the countywide consortium of stakeholders who nursed this language for many months before we endorsed it -- were intended to actually GUIDE development and conservation in San Diego County.

Advance Planning Staff worked with hundreds of citizens, property owners, real estate developers, environmentalists, agricultural organizations, building industry representatives, and professional planners, for years to create a General Plan that would build what we need, and conserve what we must. These Guiding Principles gave birth to the Community Development Model, and to the systematic method through which planning principle, and the County's commitment to authentic sustainable development, was transferred from human hearts and minds to the ground.

C1j-33

C1j-33 See response to comment O3e-34.

The DEIR should, but does not, thoroughly discuss and analyze the GP Guiding Principles (GP pp. 2-6 through 2-15), but merely cursorily sets them out and in some cases, gratuitously, without reference to factual aspects of the Accretive project, asserts compliance.

C1j-33
cont.

The following is a more serious and respectful review of the **San Diego County General Plan's Guiding Principles** and their application to this project:

GUIDING PRINCIPLE 1. Support a reasonable share of regional population growth. The DEIR fails to note that the GP establishes Valley Center's "reasonable share" at 36,000 at build-out, not the 41,000-plus that would result from this project's plopping of a new city in the middle of a well-functioning agricultural area. This discrepancy is not recognized nor analyzed.

- a.) The General Plan already accommodates more growth than SANDAG projects for 2050. The DEIR fails to justify the need for 1746 additional homes, 90,000 additional SF of commercial.
- b.) There are significant environmental and planning consequences from providing an excess of housing and employment in a rural area that are not addressed in the DEIR:

- i. As a region, with SANDAG providing coordination, we have been trying to steer growth to incorporated cities where transportation investments are occurring and goods, services, and employment are in abundance. The proposed project undermines this effort. It contradicts growth principles that all jurisdictions have developed through SANDAG, and conflicts with the Regional Transportation Plan and Sustainable Communities Strategy (SCS).
- ii. The SCS is the region's strategy for addressing GHG emissions targets for land use and transportation yet the DEIR fails to address the consequences of the proposed project conflicting with it.
- iii. By providing a glut of housing in a rural area, the proposed project throws a wrench in the region's growth strategy. The provision of more homes in Valley Center will reduce the demands for homes elsewhere. Generally, it has been the incorporated cities that have needed to plan for more homes to accommodate future regional growth. The proposed project will eliminate that need by 1746 homes. If built in the incorporated cities pursuant to regional plans, these homes would have shorter vehicle trip lengths, be closer to transit, jobs, and services, and use less water and electricity. The DEIR fails to address these consequences.

C1j-34

C1j-34 See response to comments O3e-35 through O3e-37.

- c.) There are also impacts of providing excessive commercial uses. The proposed project plans for commercial uses in excess of local and regional forecasted needs. There are two possible consequences of this situation:
 - i. the commercial space in the proposed project will never be filled, the town center will never be a center, and there will be nothing to walk to if you wanted to walk 2 miles from one end of the development to the town center;

- ii. the proposed project will pull commercial uses from other existing commercial areas nearby such as the Valley Center and Bonsall town centers. This will result in vacancies and blight in these village centers and will undermine their growth strategy and vision.
- iii. The DEIR needs to include a comprehensive economic study of the proposed project and its economic viability within the context of community and regional plans. The results of such a study will be the grounds for the evaluation of additional environmental consequences of the project.

C1j-34 cont.

GUIDING PRINCIPLE 2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services and jobs in a compact pattern of development. The project and DEIR completely ignore this principle (and its implementing Goals and Policies) with the fiction that merely adopting a map with different land use designations for 608 acres they have owned or optioned will miraculously create compliance with the County General Plan. The GP and VC Community Plan -- without this project -- currently embodies this Principle, with the design for the central Villages and the feathered-out supporting semi-rural and rural designations. This project would destroy that design and compliance.

C1j-35

As previously discussed, the Accretive project site lacks both existing and planned infrastructure. Infrastructure proposed by the project cannot be provided at a level consistent with County standards. Further, as discussed, the proposed project is not a compact pattern of development. It sprawls over 2 miles and has to include 3 town centers rather than 1 to justify the claim that it is "walkable" and thus, presumably, compact.

GUIDING PRINCIPLE 3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities. This project recognizes this Principle only in its abuse. Nowhere does the DEIR recognize or analyze the impact of the Project on the existing and proposed central Village economy and character. Worse, in its insubstantial discussion of the key CEQA issue of "Divide an Established Community" the DEIR states that there is no established community! (DEIR 3.6.5, p. 3-120.) and thus there is no need to address this issue in the DEIR. The central valley villages DO exist, they are the heart of the existing community, and they are where the GP and CP plan Valley Center's future growth is consistent with the General Plan. This issue must be fully analyzed in the DEIR. See above for more discussion on these concerns.

C1j-36

C1j-35 See response to comment O3e-38.

C1j-36 See response to comment O3e-39.

<p>GUIDING PRINCIPLE 4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance. Instead the Project proposes bulldozing 4 Million cubic yards of natural hills to make manufactured slopes, to accommodate an urban-styled city in an active agricultural area.</p> <p>GUIDING PRINCIPLE 5. Ensure that development accounts for physical constraints and the natural hazards of the land. Instead the Project proposes bulldozing 4 Million cubic yards of natural hills to make manufactured slopes, to accommodate an urban-styled city in an active agricultural area.</p> <p>GUIDING PRINCIPLE 6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation. The Project instead says perhaps NCTD might be interested in a bus stop. It is entirely car-dependent. If approved there are no commercial, no schools, no parks until phase 3, 6-8 years after plopping phase one houses in the middle of nowhere. The Project does not have legal rights for the required ingress and egress to be able to construct them. If they were constructed, they would undermine connectivity by blocking emergency egress, and detract from supporting community development patterns in the central Villages, where the GP and Community Plans call for potential construction of roads to enhance connectivity.</p> <p>GUIDING PRINCIPLE 7. Maintain environmentally sustainable communities and reduce green house gas emissions that contribute to climate change. This Project waives the flag of environmental sustainability at every opportunity, but totally ignores fundamental requirements for building where substantial investments have already been made in urban infrastructure and amenities. Description in the DEIR of the state and county new requirements for "green buildings" and energy-saving construction and facilities are beside the point. This project destroys agriculture and functioning rural lands that genuine "sustainable development" would be retaining. Further, this "fluff" is purple prose, unsubstantiated and inadequate to determine if the suggestions or promises in the SP are minimum or substantive requirements that warrant the use of "sustainable." LEED building standards, like LEED ND standards are specific, and they are expensive. Suffice to say that nothing about this applicant's performance, so far, suggests exemplary performance. Many more facts are necessary to adequately analyze this issue yet based on the information available, any characterization of the project as "sustainable" is a complete farce and undermines the ability of the public and decisions makers to evaluate the project on its true impacts, characteristics, and merits.</p>	<p>C1j-37 C1j-37 See response to comment O3e-40.</p> <p>C1j-38 C1j-38 See response to comment O3e-41.</p> <p>C1j-39 C1j-39 See response to comment O3e-42.</p> <p>C1j-40 C1j-40 See response to comment O3e-43.</p>
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GUIDING PRINCIPLE 8. Preserve agriculture as an integral component of the region’s economy, character, and open space network. Instead the Project would take 504 acres of productive agriculture out of use and replace it with an urban city. The DEIR relies on a model to devalue existing productive agriculture and ignores the reality that the project site and surrounding area contain some of the most unique and valuable agricultural operations in the region.

C1j-41

C1j-41 See response to comment O3e-44.

GUIDING PRINCIPLE 9. Minimize public costs of infrastructure and services and correlate their timing with new development. Instead the SP and implementation plan are geared to increase public infrastructure costs while minimizing the Applicant’s infrastructure costs, in an area devoid of infrastructure. Plans for construction, instead of concurrent with need, are designed to be significantly after need.

C1j-42

C1j-42 See response to comment O3e-45.

GUIDING PRINCIPLE 10. Recognize community stakeholder interests while striving for consensus. This applicant has ignored the VC community and its Community Planning Group throughout the entire planning process. Applicant attendance at Planning Group meetings has been by a consultant/lobbyist who never has answers to the questions raised regarding either specifics of the proposal, or the process. Promises to “get back to you about that” never have been kept. Claims that the proponents were “working with the community” are incorrect. They mean that they held private meetings with pre-screened potential supporters, to which the public, and certainly Planning Group Members, were in many cases dis-invited. On the very few occasions the general public was invited, food and story boards were presented, but no detailed oral presentations of the project’s contents, nor public questions were allowed. Approval of the PAA was opposed by staff and the Planning Group and a large percentage of the community; it was obtained from the Planning Commission by a procedural trick on the eve of a major holiday, so no one could know it was being acted on, and could effectively object. At the Board of Supervisor’s hearings on the removal of the improperly-placed Road 3A for the Project, the Applicant denied needing or requesting the road, and pointed to “community support” from the “Valley Center Town Council”, a non-existent organization consisting of 3 Accretive supporters, purporting to represent the “real” Valley Center community, instead of the Planning Group. Numerous Planning Group reviews were required by staff and totally ignored by the Applicant, no changes were ever made in response to any of the community’s comments.

C1j-43

C1j-43 and C1j-44
See response to comment O3e-46.

In short, the applicant has never recognized community interests and has never (unlike all the other developers the community has worked with) sought consensus.

C1j-44

IV. Staff identified 121 GP Policy conflicts in the Scoping Letter. These are not analyzed in the DEIR, or in the Specific Plan, or anywhere else. Why not?

Earlier in the review of this project a "Project Issue Checklist" listed (on 350-plus pages) more than 1000 project "issues" with various planning documents. The list included Major Project Issues (with GP Policies) as well as GP and CP Policies that posed potential conflicts. Analyses of these "issues" are essential to a General Plan Amendment. How else can anyone understand what the GPA proposes to amend?

The staff directive to the applicant at that time was, "Please immediately review the policies and indicate to staff how you would propose to revise these policies or if you disagree with staff's analysis. If policy revisions are required to the County's General Plan, then the project's EIR must also analyze the impacts to the County's General Plan." In subsequent editions, the "Checklist" refers the reader to other documents – in some instances to a GPAR (General Plan Amendment Report), in others to the Land Use Section of the EIR. However, looking at these resources there is no policy by policy discussion of consistency. This level of analysis must be provided.

The June 13, 2012 version of the Project Checklist is attached. We request County response and analysis of each item listed.

A. CEQA requires these analyses, and the DEIR omits them. The DEIR (in Section 3.1.4.1, pp 3-56 – 3-64) lists what it calls the "relevant policy and regulatory framework" for the project. But this list is not the detailed analyses that CEQA requires; instead, under the rubric of "Existing Conditions" this section is mainly a summary of applicable planning documents.

Section 3.1.4.2 (p 3-64) is titled "Analysis of Project Impacts and Determination of Significance." Here in the subsection "Impact Analysis" analyses of specifics are either missing or inadequate, and replaced with brief descriptions of the project followed by assertions. Examples are rife, here are a few:

- 1.) Without bothering even to acknowledge the array of GP policies that would have to change in order to approve this SP/GPA, the DEIR merely asserts the conclusion: "The proposed project includes a General Plan Amendment which, if approved, would result in the project being consistent with the General Plan."
- 2.) There is no discussion of LEED ND criteria, and the GP Community Development Model is presented as if it is no more than an arrangement of densities rather than a reflection of a whole complex of interdependent ideas about sustainable development. Nevertheless, the DEIR asserts that "the proposed project would be consistent with the Community

C1j-45

C1j-45 See response to comment O3e-47.

C1j-46

C1j-46 See response to comments O3e-48 through O3e-50.

Development Model of the County General Plan and designed to meet the LEED Neighborhood Development Certification or an equivalent."

3.) In the few cases where specific GP policies are cited, the evidence for consistency with the policy is in some cases asserted by merely repeating the language of the policy itself. For LU1.2: *"the project is not "leap frog development" because it is designed to conform to the Community Development Model, provides necessary services and facilities, and would be designed to meet the LEED Neighborhood Develop Certification or an equivalent.* For LU3-1, LU3-2 and LU3-3: *"The project likewise provides "a complete neighborhood" to include a neighborhood center within easy walking distance of surrounding residences while providing a mixture of residential land use designations and development regulations that accommodate various building types and styles."*

4.)In a few cases where the SP/GPA proposes amendments to Mobility Element road classifications or acceptable LOS levels, the DEIR argues that the SP/GPA is not inconsistent with the GP because relaxing the standards makes it consistent. Again, the point here is that consistency is achieved only by amending the General Plan to fit the project.

5.) The DEIR (Section 3.1.4, p 3-56, Land Use Planning, line 4) refers the reader to the Specific Plan, and asserts falsely (p. 3-65) that *"the project's conformance with other General Plan policies is detailed in the Specific Plan. Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant."*

6.)In its cursory dismissal of Growth Inducement (DEIR 1.8.1 p1-37) the DEIR states: *"...While the project site and surrounding areas are not identified in the General Plan for growth, it is a location where such growth is likely to occur because the project area can accommodate the growth. Typical obstacles to growth include a lack of services and infrastructure which are not present in this area. The project area is positioned in proximity to the I-15 and within existing districts for sewer water and fire service. There is an adequate road network offering multiple routes throughout the project and would ultimately connect with freeway ramps. By itself, the proposed project takes advantage of the location of the project site, but would not result in any change in density for surrounding areas..."* There is a brief reference to potential increased density from Property Specific Requests near the Project, **but there is NO discussion or analysis of the growth inducing impacts of new road, water and sewer infrastructure that properties west, east and south of the project would tout as reasons why they should also be developed at urban densities.**

7.) There should also be discussion and analysis of the impact of the precedent that would be set by encouraging this project's General Plan busting notion that the Community Development Model is a "Village" puzzle piece that any developer's ambition can drop anywhere in the San Diego County countryside.

C1j-46
cont.

C1j-47

C1j-48

C1j-49

C1j-50

C1j-47 See response to comment O3e-51.

C1j-48 See response to comment O3e-52.

C1j-49 See response to comment O3e-53.

C1j-50 See response to comment O3e-54.

B. It is important to note here that these analyses do not appear in the Specific Plan; nor does the GPAR that the staff referred to a few months ago ever materialize (even though this would be no substitute for the CEQA requirement.) It is odd that the DEIR and other project documents all refer the reader to this dry hole. Is this an error? Historically, a GPAR presents the details of a GPA and discusses its consistency, or lack of consistency, with all GP elements, but this *Specific Plan* text does NOT include a *General Plan Amendment Report* (GPAR) even though the SP at page 1-12 states that "... Chapter V of the General Plan Amendment Report and Appendix A provides detailed analysis regarding how and why this Specific Plan is consistent with the goals and policies of the County General Plan..." There is neither the GPAR nor an Appendix A! This application omits this crucial report. Why?

C. General Plan Goals and Policies NOT discussed or analyzed in the DEIR include:

LAND USE ELEMENT

LU-1.4 Village Expansion: *"Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all the following criteria are met: Public facilities and services can support the expansion without a reduction of services to other County residents, and the expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area"*

Comment-INCONSISTENT: If there was an existing or planned Village in western valley Center, Accretive could try to use this provision, instead of being prohibited by the Leapfrog Development provisions of LU-1.2. However, the only "existing or planned Village" in Valley Center is the Village in the central valley where north and south nodes are separated by a dramatic escarpment and Moosa and Keyes Creeks. This area has existed as a "Village", has been planned for expansion for more than 50 years and was designated a SANDAG Smart Growth Opportunity area with the recent update of the County General Plan. The area is sewerred and has received a large grant from the state of California to expand wastewater facilities. Valley Center Road which traverses this area and connects to Escondido and Pauma Valley was improved to Major Road standards only a few years ago in anticipation of expanded development here. The Valley Center Community Planning Group has increased residential densities in this area so that about 25% of the community's growth can be accommodated in the "vibrant, compact Villages" the community has envisioned.

This provision is a clear companion to and exemplifies the GP support for intensifying development in existing Village areas and its thrust against leapfrog development -- by emphasizing only expansion of an existing Village. The Project also fails to meet the criteria: Its construction would clearly reduce services to all Valley Center residents outside the development by taking away from the economic viability of the existing two

C1j-51

C1j-51 See response to comments O3e-55 and O3e-56.

<p>Villages, as well as blocking emergency evacuation ability for current residents. As previously pointed out, its urban pattern is totally out of “character and scale” with Valley Center’s vision. Nor does a third Village provide “contiguous growth of a Village area.” A new Regional Category Village is prohibited in the area of the Proposed Project. This provision would have to be amended to allow this Project, and the DEIR would have to analyze the environmental effects countywide of such an amendment.</p>	<p>C1j-51 cont.</p>	
<p>LU-2.3 Development Densities and Lot Sizes: “Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.” Comment-INCONSISTENT: This is another demonstration of the interwoven fabric of the GP. Densities and lot sizes reflect community character. Valley Center’s community character (once you drop Accretive’s fiction that there is no existing community) is primarily rural, exemplifying the Community Development Model at the heart of the GP. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.</p>	<p>C1j-52</p>	<p>C1j-52 See response to comment O3e-57.</p>
<p>LU-2.4 Relationship of Land Uses to Community Character: “Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.” Comment-INCONSISTENT: This is yet another demonstration of the interwoven fabric of the GP. Requiring projects to comply with the applicable Community Plan is the most effective way to meet the GP Goal LU-2, to maintain the county’s rural character. Valley Center’s community character (once you drop Accretive’s fiction that there is no existing community) is primarily rural, exemplifying the Community Development Model at the heart of the GP. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as previously pointed out.</p>	<p>C1j-53</p>	<p>C1j-53 See response to comment O3e-58.</p>
<p>LU-5.3 Rural Land Preservation: “Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.” Comment-INCONSISTENT: If this Project proposed development consistent with its existing Land Use Designations, it would still be required by this provision to “preserve,” not destroy. The proposed project destroys even more open space, agricultural lands, wildlife habitat and corridors, and watersheds than it would be allowed with consistent development, by its urbanized design, density, and size, as previously pointed out. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.</p>	<p>C1j-54</p>	<p>C1j-54 See response to comment O3e-59.</p>
<p>LU-6.1 - Environmental Sustainability: “Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.” Comment- INCONSISTENT</p>	<p>C1j-55</p>	<p>C1j-55 See response to comment O3e-60.</p>

There have been thirteen (13) Group 1 animal 'species of concern' observed on the Accretive project site. They include lizards, snakes, raptors, small mammals, large mammals and passerine birds. Most of the wildlife surveys conducted focused on the proposed open space areas, brushing over the considerable land area devoted to agriculture as being disturbed. Of the 608-acres on the Project site, 504-acres will be graded, cut and filled, for the construction of the Project.

The DEIR acknowledges the significant impact to these 13 species [and presumably to other species numerous enough not to be of concern], and particularly the raptors [white-tailed kite, Cooper's hawk, turkey vulture] and the loss of 504-acres of foraging area [including agricultural areas]. The DEIR dismisses this loss with 81.7-acres of on- and off-site mitigation area [presumably already populated by members of these species with whom the Project's individuals will compete], a substantial differential from the complete 608-acres. Many of the individuals of the 13 species will be killed during construction operations, particularly the smaller, less mobile animals. Others will be forced into new territory. Of the larger animals, they will be forced to compete with others of their species in substantially less area.

So, the Project is not protecting sensitive natural resources except those that it is prohibited from completely destroying [largely, riparian wetlands]. Such practices of building urban density projects in rural and even agricultural areas will ultimately decimate the natural environment.

C1j-55
cont.

LU-6.4 Sustainable Subdivision Design: "Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]"

Comment-INCONSISTENT: The Accretive Project instead proposes the minimum required open space, eliminates existing and imperils adjacent agricultural operations, and substantially worsens fire safety and defensibility, as shown by the Deer Springs Fire District comments. Instead of reducing impervious footprints, it proposes 1746 residential units etc., covering 504 of its 608 acres. Trumpeting "sustainable" development practices, it completely ignores the fundamental requirements of LEED ND to have a Smart Location and preserve Agriculture. The public amenities necessary to support their proposed city in the county, parks, schools, sewers, are all couched in "conceptual" terms, with built-in defaults to convert acres to still more additional residences. If, for example, the school or park sites (proposed without school and park amenities) are not accepted, the SP provides for their easy conversion to residential uses. This provision would have to be amended to allow this Project, and the DEIR would have to analyze the environmental effects countywide of such an amendment.

C1j-56

C1j-56 See response to comment O3e-61.

LU-6.6 Integration of Natural Features Into Project Design: "Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources."

C1j-57

C1j-57 See response to comment O3e-62.

Comment: This requirement is again honored only in its violation by this Project. Over four million cubic yards of grading to destroy natural features and create “manufactured” hills suitable only for urbanized residential construction. This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

C1j-57
cont.

LU-6.6 Integration of Natural Features into Project Design: “Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.”
Comment-INCONSISTENT

With the exception of the riparian woodlands/wetlands that must be set aside, the 4 million cubic yards of blasting and grading will obliterate any other natural features of the Project site. Once completed, the Project will resemble any urban center in the county, with little of the natural landscape remaining. Native vegetation habitats will be destroyed and mitigated off-site. Animal populations will be destroyed or shoved to the remaining riparian set-asides or off-site. Avoidance of sensitive environmental resources is minimal; destruction of this area’s natural features and mitigation elsewhere are the preferred approaches for this project, obviously inconsistent with Valley Center’s objectives.

C1j-58

C1j-58 See response to comment O3e-62.

LU-6.7 Open Space Network: “Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.”
Comment-INCONSISTENT

This Project has reserved minimal open space along wetlands and riparian areas that are particularly protected by federal, state, and county laws. The continuity of the open space will be broken by multiple road crossings with culverts mostly inadequately sized for safe wildlife passage. Intensity urban development will dominate the presently rural agricultural and natural vistas with rows of dense urban rooftops. The open spaces being set aside are not coordinated with the draft MSCP/PAMA and will not connect with any similar open space uses off-site. While the Project is within the draft MSCP boundary, it is not part of a PAMA.

C1j-59

C1j-59 See response to comment O3e-63.

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

Comment-INCONSISTENT: Could the writers of the GP and the Board of Supervisors with their approval not make more clear that the destruction of the land proposed by this Project’s over four million cubic yards of grading to destroy natural features is prohibited? The Project glorifies, not limits grading. The Project proposes to obliterate, not “not significantly alter,” the dominant physical characteristics of the site. This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

C1j-60

C1j-60 See response to comment O3e-64.

LU-9.6 Town Center Uses: “Locate commercial, office, civic, and higher-density

C1j-61

C1j-61 See response to comment O3e-65.

residential land uses in the Town Centers of Village or Rural Villages at transportation nodes...."

Comment-INCONSISTENT: As previously pointed out in the comments on the Project's total failure to meet the LEED ND Smart Location Requirement, it is not designed as a Transit Corridor or Route with Adequate Transit Service. It is not a "transportation node." This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

C1j-61
cont.

LU-09.11 Integration of Natural Features into Villages: *"Require the protection and integration of natural features, such as unique topography or streambeds, into Village projects."*

Comment-INCONSISTENT: This provision was included in the GP because Valley Center required the developers of the north Village to do exactly that, making the streambed there an open space centerpiece of their design in their cooperative plans for their adjacent projects. Accretive instead proposes to obliterate the natural topography for their entire site, grading over four million cubic yards of genuinely natural features into manufactured hills. This policy would require amendment to approve this project. The DEIR would have to analyze the environmental countywide effects of such an amendment.

C1j-62

C1j-62 See response to comment O3e-66.

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

Comment- INCONSISTENT: This Project does not respect nor significantly conserve the unique natural flora and fauna of the site, nor does it conserve the rural character of the site. This Project will destroy a mosaic of natural vegetation habitats that are interspersed among agricultural uses. The current mix of natural habitats, orchards and row crops provides distinctive opportunities for a variety of faunal species [several of them sensitive], benefits the local hydrology by restraining and filtering run-off, and presents a pastoral view-shed that is historically characteristic of north San Diego County. The Project will create severe hydrology issues with the addition of hundreds of acres of impermeable road and rooftop surfaces that will cause excessive run-off. Run-off that would otherwise enter the water table and help to stabilize levels vital to the riparian habitats down-slope, will be impounded and/or dispersed on the surface. The Project will be composed of dense urban village configurations that are completely at odds with rural and semi-rural areas and the natural habitats and populations they support.

C1j-63

C1j-63 See response to comment O3e-67.

MOBILITY ELEMENT

M-12.9 Environmental and Agricultural Resources: *"Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors and agricultural lands. Within the MSCP preserves,*

C1j-64

C1j-64 See response to comment O3e-68.

conform siting and use of trails to County MSCP Plans and MSCP resource management plans."

COMMENT-INCONSISTENT

Presently, the trails proposed for the Project will intrude into the buffer and LBZ areas along side the designated biological open spaces as well as the open spaces themselves. The fences proposed to separate and protect segments of the open spaces from the edge effects created by the Project [human intrusions, domesticated cats and dogs, invasive plant species, etc.] will also create barriers to the movement of wildlife. Instead of treating these biological open spaces as retreats and corridors for the movement of wildlife, the trails proposed would turn them into parks for humans and their pets. This will have an adverse effect on the value of these open spaces for wildlife.

C1j-64
cont.

CONSERVATION AND OPEN SPACE ELEMENT

GOAL COS-2 Sustainability of the Natural Environment: *"Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development."*

COMMENT-INCONSISTENT:

The Project will eliminate 504-acres of mixed native and agricultural lands that provide foraging area for numerous animal species identified in the biological resources report. This represents an incremental loss of habitat and ultimately a loss of local wildlife populations within the county and the Project site. The removal of the project site from the inventory of rural lands to create an urban village will constitute an irreversible loss and opposes the intent of sustainable development. It will likely result in growth inducing pressure on surrounding properties as the rural and natural characteristics of the land disappear.

C1j-65

C1j-65 See response to comment O3e-69.

COS-2.1 Protection, Restoration and Enhancement: *"Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important Natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate."*

COMMENT-INCONSISTENT:

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

C1j-66

C1j-66 See response to comment O3e-70.

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

C1j-67

C1j-67 See response to comment O3e-71.

COMMENT- INCONSISTENT

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

C1j-67
cont.

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

COMMENT-INCONSISTENT

The project is preserving and restoring the on-site wetlands, habitats that are in shortest supply regionally, but the upland vegetation components will be subjected to severe grading, and fuel modification to accommodate the development. Rather than being enhanced, the upland areas will be shaved of value for both flora and fauna.

C1j-68

C1j-68 See response to comment O3e-72.

COS- 3.2 Minimize Impacts of Development: *“Require development projects to: Mitigate any unavoidable losses of wetlands, including its habitat functions and values; Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydro modification, land and vegetation clearing, and the introduction of invasive species.”*

Comment -INCONSISTENT

The Project proposes to mitigate the loss of wetlands caused by new road crossings by restoring or creating wetland on-site adjacent to existing wetlands. The value of mitigating wetland losses on-site is questionable given the edge effects caused by human intrusion, domestic cats and dogs, invasive plant species, trash, etc. that cause mitigation efforts to be diminished. Exacerbating the edge effects is the plan to establish trails within and adjacent to the biological open spaces.

C1j-69

C1j-69 See response to comment O3e-73.

Further, the Project’s storm water run-off from the massive acreage of impermeable surfaces to be built is likely to impact the water regime within the biological open spaces. Adding too much or, conversely, removing too much water from the water table can have adverse effects on the survivability of the riparian habitat.

HOUSING ELEMENT

H-1.9 Affordable Housing Through General Plan Amendments: *“Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project when this is legally permissible.”*

Comment-INCONSISTENT: There appears to be NO discussion anywhere in the SP or DEIR regarding Affordable Housing or Goal H-1 and Policy H-1.9. Perhaps, since there are no firm plans for anything beyond the Phase I 354 homes, the County considers this not to be a “large-scale residential project?” Since the overall Project proposes more than 1746 homes and over 5000 new residents, it appears to be a “large-scale residential project.” This provision would require amendment to approve this project.

C1j-70

C1j-70 See response to comment O3e-74.

The DEIR would have to analyze the environmental effects countywide of such an amendment. Alternatively, the DEIR should contain some discussion and analysis of why this provision is not applicable or is otherwise satisfied.

C1j-70

H-2.1 Development That Respects Community Character: *“Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]”*

Comment: This is yet another demonstration of the interwoven fabric of the GP. Requiring projects “not to degrade or detract from the character of surrounding development consistent with the Land Use Element” explicitly ties housing back to the bedrock Land Use Element, the Community Development Model, and the LEED ND Smart Location Requirement. Unless you resort to Accretive’s fiction that there is no existing community (and by extension, no existing “community character” to the western Valley Center neighborhood) plopping an urban project the size of Del Mar into a rural, predominantly agricultural area designated for Semi-Rural uses, would be in significant contradiction to the “character of surrounding development.” Once again the GP requires developers to comply with the applicable Community Plan. That is the most effective way to meet the GP Goal LU-2, to maintain the county’s rural character. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as previously pointed out.

C1j-71

C1j-71 See response to comment O3e-75.

V. Community Plan Inconsistencies

A. Community Character Goals

*Preserve and enhance the rural character by “maintaining a pattern of land use consistent with the following regional categories: **Village.** Enhance the rural village character of valley center’s north and south villages... **Semi-Rural:** Preserve and maintain the overall rural and agricultural character of the semi-rural areas....”*

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

Policy 2. Prohibit monotonous tract developments

Comment: The SP and DEIR cannot avoid the clear violation of these provisions by the fiction of merely adopting a new Map showing three Villages instead of two. The rural character of the project site, indeed all of the Planning Area, will be destroyed by plopping an urbanized area the size of Del Mar in the middle of an active agricultural area. Destruction of a designated Semi-Rural agricultural area cannot be interpreted to be “preservation.” The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1j-72

C1j-72 See response to comment O3e-76.

B. Land Use Goals

“Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained.

“A pattern of development that conserves Valley Center’s natural beauty and resources, and retains Valley Center’s rural character.”

C1j-73

C1j-73 See response to comment O3e-77.

“Development that maintains Valley Center’s rural character through appropriate location and suitable site design.”

Comment: The SP and DEIR cannot avoid the clear violation of these provisions. Adding a third Village is inconsistent with establishing two existing Villages, consistent with both the GP and CP, the Community Development Model, and the Smart Location requirements of LEED ND. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1j-73
cont.

C. Village Boundaries Map

Comment: The SP and DEIR cannot avoid the clear violation of the existing Map, which shows the two, not three villages, by the fiction of merely adopting a new Map showing three Villages instead of two addresses the resulting conflicts with numerous other GP and CP provisions. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1j-74

C1j-74 See response to comment O3e-78.

D. Rural Compatibility

“Require new development to adhere to design standards consistent with the character and scale of a rural community. Particularly important: roads follow topography and minimize grading; built environment integrated into the natural setting and topography; grading that follows natural contours and does not disturb the natural terrain; structure design and siting that allows preservation of the site’s natural assets; retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas.”

“Require new residential development to construct roads that blend into the natural terrain and avoid “urbanizing” improvements, such as widening, straightening, flattening and the installation of curbs, gutters and sidewalks. Follow Valley Center’s Community Right of Way Development Standard.”

“Buffer residential areas from incompatible activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space.”

Comment: Neither the SP nor the DEIR is clear as to which design standards apply. The SP purports to override all county documents and states it prevails over any inconsistent provisions in the GP, CP, ordinances or design guidelines. In other places it states some aspect of the project is consistent with the VC Design Guidelines, implying that they would, nevertheless, be applicable. The many pictures, instead of clear text, clearly show urbanized design, out of scale and character for a rural community. The massive grading replaces natural hills with manufactured slopes to accommodate urban design, ignoring natural topography for both roads and residences. The request for deviations from road standards is also in direct conflict with these provisions in the Community Plan. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

C1j-75

C1j-75 See response to comment O3e-79.

E. Commercial Goals

“Prohibit strip commercial development by containing commercial uses in the Cole Grade and Valley Center Road area and the Mirar de Valle Road and Valley Center

C1j-76

C1j-76 See response to comment O3e-80.

<p>Road area. Application of the Semi-Rural Land Use Designation to currently zoned commercial properties located outside the Villages.” Comment: Neither the SP nor the DEIR deals with the fundamental fact that the CP establishes commercial uses only in the two existing Villages, and eliminates commercial uses elsewhere, consistent with smart growth principles and the Community Development Model. The Semi-Rural Land Use Designation for the Project Site is required by both the GP and SP to remain so. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.</p>		
<p>F. Agricultural Goals <i>“Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure continuation of an important rural lifestyle in Valley Center. Prohibit residential development which would have an adverse impact on existing agricultural uses.”</i> Comment: Neither the SP nor the DEIR addresses this major thrust of both the GP and CP to “support” Agriculture, not destroy it. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.</p>	<p>C1j-76 cont. C1j-77</p>	<p>C1j-77 See response to comment O3e-81.</p>
<p>G. Mobility Goals <i>“ Road design shall reflect the rural character and needs unique the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated.” “Road alignment shall minimize the necessity of altering the landscape by following as much as possible the contours of the existing natural topography without sacrificing safety or sight distance criteria.” “Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines.” Policy 12: “ Where a clear circulation need that benefits the overall community, public roads consistent with DPW policy shall be dedicated and constructed. Future subdivisions access public roads via at least two separate access points.”</i> Comment: As noted above, neither the SP nor the DEIR is clear as to which design standards apply. There appears to have been no consideration of whether this Project can provide two separate LEGAL access points to public roads or if other public roads within the project would provide a clear circulation need that benefits the entire community are needed (to replace proposed private roads. The massive grading proposed seems a clear violation of the requirement for minimizing altering the landscape and following existing natural topography. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.</p>	<p>C1j-78</p>	<p>C1j-78 See response to comment O3e-82.</p>
<p>H. Fire Protection Goals <i>“ New development using imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards.”</i> Comment: The continued objections of the Deer Springs Fire District to this Project negate compliance with this requirement, yet the SP and DEIR continue blithely on, as if</p>	<p>C1j-79</p>	<p>C1j-79 See response to comment O3e-83.</p>

no objections or deficiencies exist. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C1j-79
cont.

I. School Facilities

“Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding.”

Comment: No school district has accepted the possible additional students generated by the Project. The residential construction will precede, not be coincident with, school construction. The potential school site is conditioned to be turned into additional residences if not accepted by a school district. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

C1j-80

C1j-80 See response to comment O3e-84.

J. Open Space Goals

“Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space.”

Comment: The SP only tentatively designates a 12-acre public park site. The Project minimally meets the PLDO ordinance 3-acres per 1,000 population requirement, falling woefully short of the 10-acres per 1,000 GP goal for parks. At least 350 homes will be constructed and occupied before any parks, public or private. The SP makes no provision for construction of park amenities, just dedication of raw land. Overall Project site planning appears to destroy any existing connectivity for animal migration, instead of creating or maintaining a functional open space system. The design is to create an isolated urbanized compound totally unrelated to its surroundings. This will be a closed community of urban sprawl, not one with “openness and access to surrounding open space.” The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

C1j-81

C1j-81 See response to comment O3e-85.

1. BOTH the Specific Plan and the DEIR for the project fail to substantiate consistency with CEQA or consistency with the San Diego GP policies that would justify exemption of this project from prohibition of Leap Frog Development,
2. The DEIR fails to disclose environmental impacts and/or provide adequate mitigation for this project.
3. Decision makers and the public are deprived of this essential information which is required by CEQA.
4. These failures require re-circulation of a revised DEIR that addresses them.

C1j-82

C1j-82 See response to comment O3e-86.

ATTACHMENT I.**SELECTED BRIEF EXCERPTS FROM LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT**

"...Unlike other LEED rating systems, which focus primarily on green building practices and offer only a few credits for site selection and design, LEED for Neighborhood Development places emphasis on the site selection, design, and construction elements that bring buildings and infrastructure together into a neighborhood and relate the neighborhood to its landscape as well as its local and regional context.

The work of the LEED-ND core committee, made up of representatives from all three partner organizations, has been guided by sources such as the Smart Growth Network's ten principles of smart growth, the charter of the Congress for the New Urbanism, and other LEED rating systems. LEED for Neighborhood Development creates a label, as well as guidelines for both decision making and development, to provide an incentive for better location, design, and construction of new residential, commercial, and mixed-use developments"

LEED ND Overview and Process

The LEED 2009 for Neighborhood Development Rating System is a set of performance standards for certifying the planning and development of neighborhoods. The intent is to promote healthful, durable, affordable, and environmentally sound practices in building design and construction.

Prerequisites and credits in the rating system address five topics:

- Smart Location and Linkage (SLL)
- Neighborhood Pattern and Design (NPD)
- Green Infrastructure and Buildings (GIB)
- Innovation and Design Process (IDP)
- Regional Priority Credit (RPC)

When to Use LEED for Neighborhood Development

The LEED for Neighborhood Development Rating System responds to land use and environmental considerations in the United States. It is designed to certify exemplary development projects that perform well in terms of smart growth, urbanism, and green building. Projects may constitute whole neighborhoods, portions of neighborhoods, or multiple neighborhoods. There is no minimum or maximum size for a LEED-ND project, but the core committee's research has determined that a reasonable minimum size is at

least two habitable buildings and that **the maximum area that can appropriately be considered a neighborhood is 320 acres, or half a square mile.**

...
This rating system is **designed primarily** for the planning and development of **new green neighborhoods, whether infill sites or new developments proximate to diverse uses or adjacent to connected and previously developed land.**

Many infill projects or projects near transit will be in urban areas, which helps direct growth into places with existing infrastructure and amenities. LEED-ND also promotes the redevelopment of aging brownfield sites into revitalized neighborhoods by rewarding connections beyond the site, walkable streets within the site, and the integration of any historic buildings and structures that will give the new neighborhood development a unique sense of place.

...
Size is a defining feature of a neighborhood and is typically based on a comfortable distance for walking from the **center** of the neighborhood to its edge; that suggests an area of 40 to 160 acres. In the 1929 Regional Plan of New York and Environs, urban planner Clarence Perry outlined a neighborhood center surrounded by civic uses, parks, residential uses, a school, and retail at the edge, all within one-quarter mile—about a 5-minute walk. This amounts to an area or pedestrian “shed” of 125 acres, or if the land area is a square, 160 acres. Although Perry’s diagram does not address many of the sustainable features of LEED-ND, such as access to multimodal transportation options, location of infrastructure, and building form, it serves as a reference point for the mix of uses and walkable scale of neighborhood development encouraged in the rating system. Most people will walk approximately one-quarter mile (1,320 feet) to run daily errands; beyond that, many will take a bicycle or car. Additional research shows that people will walk as far as a half-mile (2,640 feet) to reach heavy rail transit systems or more specialized shops or civic uses.

Since half a square mile contains 320 acres, the core committee has decided that this size should serve as guidance for the upper limit of a LEED-ND project.

SLL Prerequisite 1: Smart Location

Intent

To encourage development within and near existing communities and public transit infrastructure. To encourage improvement and redevelopment of existing cities, suburbs, and towns while limiting the expansion of the development footprint in the region to appropriate circumstances. To reduce vehicle trips and vehicle miles traveled (VMT). To reduce the incidence of obesity, heart disease, and hypertension by encouraging daily physical activity associated with walking and bicycling.

Requirements

FOR ALL PROJECTS

Either (a) locate the project on a site served by existing water and wastewater infrastructure or (b) locate the project within a legally adopted, publicly owned, planned water and wastewater service area, and provide new water and wastewater

infrastructure for the project.

AND

OPTION 1. Infill Sites

Locate the project on an infill site.

OR

OPTION 2. Adjacent Sites with Connectivity

Locate the project on an adjacent site (i.e., a site that is adjacent to previously developed land; see Definitions) where the connectivity of the site and adjacent land is at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project boundary, that is adjacent to previous development. Existing external and internal intersections may be counted

if they were not constructed or funded by the project developer within the past ten years. Locate and/or design the project such that a through-street and/or nonmotorized right-of-way intersects the project boundary at least every 600 feet on average, and at least every 800 feet, connecting it with an existing street and/or right of way outside the project; nonmotorized rights-of-way may count for no more than 20% of the total. The exemptions listed in NPD Prerequisite 3, Connected and Open Community, do not apply to this option.

OR

OPTION 3. Transit Corridor or Route with Adequate Transit Service

Locate the project on a site with existing and/or planned transit service such that at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1 (both weekday and weekend trip minimums must be met). Weekend trips must include service on both Saturday and Sunday. Commuter rail must serve more than one metropolitan statistical area (MSA) and/or the area surrounding the core of an MSA.

Table 1. Minimum daily transit service

	Weekday trips	Weekend trips
Projects with multiple transit types (bus, streetcar, rail, or ferry)	60	40
Projects with commuter rail or ferry service only	24	6

If transit service is planned but not yet operational, the project **must demonstrate one of the following:**

- a. The relevant **transit agency has a signed full funding grant agreement** with the Federal Transit Administration **that includes a revenue operations date for the start of transit service.** The revenue operations date must be **no later than**

the occupancy date of 50% of the project's total building square footage.

b. For bus, streetcar, bus rapid transit, or ferry service, the transit agency must certify that it has an approved budget that includes specifically allocated funds sufficient to provide the planned service at the levels listed above and that service at these levels will commence no later than occupancy of 50% of the project's total building square footage.

c. For rail service other than streetcars, the transit agency must certify that preliminary engineering for a rail line has commenced. In addition, the service must meet either of these two requirements: A state legislature or local subdivision of the state has authorized the transit agency to expend funds to establish rail transit service that will commence no later than occupancy of 50% of the project's total building square footage.

OR

A municipality has dedicated funding or reimbursement commitments from future tax revenue for the development of stations, platforms, or other rail transit infrastructure that will service the project no later than occupancy of 50% of the project's total building square footage."

The "Project Checklist" for LEED ND Certification lists mandatory requirements and shows the range of concerns that LEED ND addresses. All of these areas should be addressed before the Accretive project can be declared consistent with the LEED ND standard. None of this analysis has been done.

**LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT
PROJECT CHECKLIST**

SMART LOCATION and LINKAGE

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Smart Location

Prerequisite 2 Imperiled Species and Ecological Communities

Prerequisite 3 Wetland and Water Body Conservation

Prerequisite 4 Agricultural Land Conservation

Prerequisite 5 Floodplain Avoidance

These are areas of focus and relative priority for LEED ND SMART LOCATION & LINKAGE points and should also be addressed

Credit 1 Preferred Locations 10

Credit 2 Brownfield Redevelopment 2

Credit 3 Locations with Reduced Automobile Dependence 7

Credit 4 Bicycle Network and Storage 1

Credit 5 Housing and Jobs Proximity 3

- Credit 6 Steep Slope Protection 1
- Credit 7 Site Design for Habitat or Wetland and Water Body Conservation 1
- Credit 8 Restoration of Habitat or Wetlands and Water Bodies 1
- Credit 9 Long-Term Conservation Management of Habitat or Wetlands and Water Bodies 1

NEIGHBORHOOD PATTERN AND DESIGN

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Walkable Streets

Prerequisite 2 Compact Development

Prerequisite 3 Connected and Open Community

These are areas of focus and relative priority for LEED ND NEIGHBORHOOD PATTERN and DESIGN points and should also be addressed

- Credit 1 Walkable Streets 12
- Credit 2 Compact Development 6
- Credit 3 Mixed-Use Neighborhood Centers 4
- Credit 4 Mixed-Income Diverse Communities 7
- Credit 5 Reduced Parking Footprint 1
- Credit 6 Street Network 2
- Credit 7 Transit Facilities 1
- Credit 8 Transportation Demand Management 2
- Credit 9 Access to Civic and Public Spaces 1
- Credit 10 Access to Recreation Facilities 1
- Credit 11 Vistability and Universal Design 1
- Credit 12 Community Outreach and Involvement 2
- Credit 13 Local Food Production 1
- Credit 14 Tree-Lined and Shaded Streets 2
- Credit 15 Neighborhood Schools 1

GREEN INFRASTRUCTRE AND BUILDINGS

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Certified Green Building

Prerequisite 2 Minimum Building Energy Efficiency

Prerequisite 3 Minimum Building Water Efficiency

Prerequisite 4 Construction Activity

Prerequisite 5 Pollution Prevention

These are areas of focus and relative priority for LEED ND GREEN INFRASTRUCTURE AND BUILDINGS points and should also be addressed

- Credit 1 Certified Green Buildings 5
- Credit 2 Building Energy Efficiency 2
- Credit 3 Building Water Efficiency 1
- Credit 4 Water-Efficient Landscaping 1
- Credit 5 Existing Building Reuse 1

LETTER

RESPONSE

- Credit 6 Historic Resource Preservation and Adaptive Use 1
- Credit 7 Minimized Site Disturbance in Design and Construction 1
- Credit 8 Stormwater Management 4
- Credit 9 Heat Island Reduction 1
- Credit 10 Solar Orientation 1
- Credit 11 On-Site Renewable Energy Sources 3
- Credit 12 District Heating and Cooling 2
- Credit 13 Infrastructure Energy Efficiency 1
- Credit 14 Wastewater Management 2
- Credit 15 Recycled Content in Infrastructure 1
- Credit 16 Solid Waste Management Infrastructure 1
- Credit 17 Light Pollution Reduction 1

INNOVATION AND DESIGN PROCESS

Credits are given for conducting an exemplary process

- Credit 1 Innovation and Exemplary Performance 1–5
- Credit 2 LEED® Accredited Professional 1

Regional Priority Credit 4 possible points

- Credit 1 Regional Priority 1–4

ATTACHMENT II
ACCRETIVE PROJECT ISSUE CHECKLIST 6/13/12

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community		Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)			
PDS (Department of Planning & Development Services) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
11	31	Fire Protection Plan	Please remove the discussion regarding Solar Photovoltaic Power System. The Specific Plan does not include any provisions for a solar facility.	The FPP has been revised to address the the comments from the Deer Springs FPD and County Fire Authority.	6/14/12 12/10/12 3/20/13
11	32	Fire Protection Plan	Please update the phasing exhibit to address the previous comments.	The FPP has been revised to address the the comments from the Deer Springs FPD and County Fire Authority.	6/14/12 12/10/12 3/20/13
12	1	General Comment	Please clarify the acreage of the project site and the number of properties (parcels) throughout the technical studies.		6/14/12
12	2	General Comment	Please clarify the number of parcels within the project area throughout the technical studies.		6/14/12
13	1	General Plan Conformance	The project remains inconsistent with the land use map and numerous General Plan and Community Plan policies. Please see the General Plan Conformance Review attached to this letter for additional information. The project also appears to be inconsistent with the Community Plan policies identified below. Please review the policies and indicate to staff how you would propose to revise these policies or if you disagree with staff's analysis. Some of the policies identified below may not be an issue based on a review of the technical documents requested. <u>The analysis of the projects consistency with these policies will be updated upon acceptance of the technical studies.</u>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	2	General Plan Conformance - Bonsall Community Plan	Goal LU-1.1 A unique balance of Bonsall's rural agriculture, estate lots, ridgelines, equestrian uses, and open space land uses within the community, including open space and low density buffers that separate the community from adjacent cities and unincorporated community and new development that conserves natural resources and topography.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
 Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 3571 (TM), 3100 3572 (TM), 3300 12-003, 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	3	General Plan Conformance - Bonsall Community Plan	Policy LU-1.1.1 Require development in the community to preserve the rural qualities of the area, minimize traffic congestion, and to not adversely affect the natural environment.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	4	General Plan Conformance - Bonsall Community Plan	Policy P LU-1.1.2 Maintain the existing rural lifestyle by continuing the existing pattern of residential, equestrian, and agricultural uses within the Bonsall CPA.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	5	General Plan Conformance - Bonsall Community Plan	Policy LU1.1.3 Require development to be sensitive to the topography, physical context, and community character of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	6	General Plan Conformance - Bonsall Community Plan	Figure 3, Bonsall Village Boundaries.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	7	General Plan Conformance - Bonsall Community Plan	Goal 1.2 Continued development that is appropriately designed to match the rural character of the Bonsall community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	8	General Plan Conformance - Bonsall Community Plan	Policy 1.2.1 Require development that is designed to be consistent with the rural character of the Bonsall community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	9	General Plan Conformance - Bonsall Community Plan	Policy 1.2.2 Encourage the application of design review to the majority of parcels in the Bonsall CPA.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	10	General Plan Conformance - Bonsall Community Plan	Goal LU-2.1 Development that centers inside the core Village in Bonsall and discourages spot development outside that area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	11	General Plan Conformance - Bonsall Community Plan	Policy LU-2.1.1 Encourage development inside the Village boundaries (see Figure 3) which are centered around the Mission Road/Olive Hill Road and State Route 76 intersections.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	12	General Plan Conformance - Bonsall Community Plan	Goal LU-2.2 The San Luis Rey River Valley retains its rural character, while urbanized development remains within neighboring cities that are discouraged from annexing areas of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	13	General Plan Conformance - Bonsall Community Plan	Goal LU-3.1 Estate lot residential development that provides adequate housing opportunities for all residents, while maintaining and enhancing the existing rural atmosphere of the community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	14	General Plan Conformance - Bonsall Community Plan	Policy LU-3.1.2 Require subdivision design to minimize adverse impacts to community character, or to the environment, and to mitigate any impacts from other constraints on the land that could not be avoided. Require mitigation actions to remain within the CPA.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	15	General Plan Conformance - Bonsall Community Plan	Policy LU-31.3 Buffer residential areas from incompatible activities, which create heavy traffic, noise, dust, unsightly views, or from incompatibility with the surrounding environment.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	16	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.2 Require grading to be contoured to blend with natural topography, rather than consist of straight edges.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	17	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.3 Minimize grading to preserve natural landforms, major rock outcroppings and areas of existing mature trees. Integrate hillside development with existing topography and landforms.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	18	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.4 Restrict, to the maximum extent feasible, extensive grading for development projects in areas with slopes that are 20 percent or greater, in order to preserve and protect the environment, and to lessen grading and erosion.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community		Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-010 (STP)			
PDS (Department of Planning & Development Services) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	19	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.5 Require development on slopes to be stepped to follow and preserve topography to the maximum extent feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	20	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.6 Minimize cut and fill grading for roads and access ways to the absolute minimum necessary.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	21	General Plan Conformance - Bonsall Community Plan	Goal LU-5.2 The preservation of groundwater resources, community character and protection of sensitive resources in the Bonsall Community Planning Area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	22	General Plan Conformance - Bonsall Community Plan	<p>Policy LU-5.2.1 Require lot sizes, except through planned development, lot area averaging or specific plan projects, to be no smaller than:</p> <ul style="list-style-type: none"> • 50 percent of the density indicated on the Land Use Map, without clustering or lot averaging, for Semi Rural 4 and higher densities, or • Four acres for Semi Rural 10 and lower densities. <p>Implementation LU-5.2.1 Zoning Ordinance Policy LU-5.2.2 Allow further reductions in minimum lot sizes indicated in Policy LU-5.2.1, through Planned Development, Lot Area Averaging, or Specific Plan projects only when setbacks, building scale, and design are appropriate to retain the equestrian and agricultural community character in the area.</p> <p>Example: Semi Rural 2 establishes a density of one dwelling unit per two acres. Fifty percent of that density would result in a minimum lot size of one acre.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community		Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)			
PDS (Department of Planning & Development Services) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	23	General Plan Conformance - Bonsall Community Plan	Policy LU-5.2.2 Allow further reductions in minimum lot sizes indicated in Policy LU-5.2.1, through Planned Development, Lot Area Averaging, or Specific Plan projects only when setbacks, building scale, and design are appropriate to retain the equestrian and agricultural community character in the area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	24	General Plan Conformance - Bonsall Community Plan	Goal LU-6.1 Infrastructure and public utilities that are provided concurrent to development in a manner compatible with community character while minimizing visual and environmental impacts.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	25	General Plan Conformance - Bonsall Community Plan	Policy LU-6.1.2 Provide development on an orderly, phased basis so that it will not overload public facilities.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	26	General Plan Conformance - Bonsall Community Plan	Goal LU-7.1 An adequate supply of water that meets current and projected needs of both residential and agricultural users in Bonsall CPA.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	27	General Plan Conformance - Bonsall Community Plan	Goal CM-1.1 A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian and pedestrian users.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	28	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.1 Reduce traffic volume on roads recognized as future "poor level of service" with methods such as, but not limited to, providing alternate routes and reducing density.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	29	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.3 Coordinate with Caltrans to design and construct State Route 76, East Vista Way (S13), and Interstate 15 to efficiently carry traffic through the Bonsall CPA. Design and construct interior roads, such as Camino del Rey, West Lilac, Gopher Canyon, and Olive Hill to carry primarily local traffic and remain rural to the degree consistent with safety requirements.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
 Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	30	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.4 Prioritize the preservation and protection of sensitive habitats, such as wetlands, over road location, relocation, or realignment. Encourage all mitigation to be on-site and site-specific. Require mitigation within the Bonsall CPA where on-site and site-specific mitigation is not appropriate, whenever feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	31	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.5 Minimize direct access points onto Mobility Element roads to produce unimpeded traffic flow in commercial areas. Require new Commercial development to provide, where possible, indirect access through the use of existing road access points, loop, or frontage roads, common driveways or similar means.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	32	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.6 Minimize the use of cul-de-sacs in the Bonsall CPA and require new subdivisions to provide local connectivity by providing linkages for long-term circulation improvement.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	33	General Plan Conformance - Bonsall Community Plan	Goal CM-4.1 A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian, and pedestrian users.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	34	General Plan Conformance - Bonsall Community Plan	Policy CM-4.1.2 Prohibit the use of all on street parking on Mobility Element Roads outside the Village Boundaries and require development to provide adequate onsite parking.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	35	General Plan Conformance - Bonsall Community Plan	Goal CM-5.1 Scenic routes where community character and natural resources are preserved by minimizing the impacts of public or private development along roadways in Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	36	General Plan Conformance - Bonsall Community Plan	Policy CM-5.1.1 Design, maintain and/or improve scenic areas, road alignments, and realignments to minimize the alteration of the natural landform by following the contours of the existing, natural topography without sacrificing safety or sight distance criteria.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
 Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (P), 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	F
13	37	General Plan Conformance - Bonsall Community Plan	Goal COS-1.1 The preservation of the unique natural and cultural resources of Bonsall and the San Luis Rey River and associated watershed, with continued support for its traditional rural and agricultural life-style.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	38	General Plan Conformance - Bonsall Community Plan	Policy COS-1.1.4 Require development to be compatible with adjacent natural preserves, sensitive habitat areas, agricultural lands, and recreation areas, or provide transition or buffer areas.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	39	General Plan Conformance - Bonsall Community Plan	Goal COS-1.2 The continuation of agriculture as a prominent use throughout the Bonsall community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	40	General Plan Conformance - Bonsall Community Plan	Policy COS-1.2.1 Encourage the protection of areas designated for agricultural activities from scattered and incompatible urban intrusions, along with the provision of greenbelt/buffers between agricultural zoning and urban zoning.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	41	General Plan Conformance - Bonsall Community Plan	Policy COS-1.2.2 Encourage the use of agriculture easements in the CPA, especially as part of the Conservation Subdivision Program, while maintaining community character with rural and semi-rural homes.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	42	General Plan Conformance - Bonsall Community Plan	Policy COS-1.2.3 Require development to minimize potential conflicts with adjacent agricultural operations, through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture and support local and state right-to-farm regulations.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilao Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 3803 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (P), 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	R
13	43	General Plan Conformance - Bonsall Community Plan	Policy COS-1.3.3 Preserve and encourage wildlife corridors including buffer areas, which are essential to the long-term viability of wildlife populations, through open space easements, public acquisition, or other appropriate means. The width of the easement will depend on the type of wildlife using the corridor and the natural topography, plus an appropriate buffer (as determined by a certified wildlife biologist) on either side of the corridor, where feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I
13	44	General Plan Conformance - Bonsall Community Plan	Goal COS-1.4 An "astronomical dark sky" that retains the rural setting and facilitates the astronomical research in San Diego County and the continued operation of the Mt. Palomar observatory.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I
13	45	General Plan Conformance - Bonsall Community Plan	Policy COS-1.4.1 Discourage street lighting, unless necessary for safety. Require street lighting to meet basic safety standards and the County Light Pollution Code, Ordinance #7155.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I
13	46	General Plan Conformance - Bonsall Community Plan	Policy COS-1.5.1 – Require adequate setbacks from all watercourses and drainages to protect property, improve water quality, provide buffer for riparian habitat and wildlife, and enhance aesthetic quality of the riparian environment.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I
13	47	General Plan Conformance - Bonsall Community Plan	Goal COS-1.6 Important historic and prehistoric archaeological resources are identified and preserved through adequate protection for new sites, as they are discovered.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I
13	48	General Plan Conformance - Bonsall Community Plan	Policy COS-1.6.1 Prevent development, trenching, grading, clearing and grubbing and other related activities that can be damaging to significant prehistoric or historic sites.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I
13	49	General Plan Conformance - Bonsall Community Plan	Goal COS-2.1 A balanced system of local parks, open space, riding and hiking trails, with outdoor recreation facilities and services, which incorporate the outstanding natural features of the CPA and meet the needs of the residents of the Bonsall community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	I

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	50	General Plan Conformance - Bonsall Community Plan	Policy COS-2.1.1 Encourage the acquisition and development of parklands that will protect outstanding, scenic, and riparian areas, and cultural, historical, and biological resources.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	51	General Plan Conformance - Bonsall Community Plan	Policy COS-2.1.4 Require appropriate wetland preservation buffers in recreational facilities located adjacent to wetlands to use parkland to provide a transition to the wetland buffer area and buffers for additional passive recreational uses, as permitted.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	52	General Plan Conformance - Bonsall Community Plan	Policy COS-2.1.5 Coordinate with the Bonsall Community Sponsor Group on the future siting, naming, and planning of community parks in Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	53	General Plan Conformance - Bonsall Community Plan	Policy COS-3.1.1 Encourage agricultural and equestrian open spaces and only encourage linking of open space if it is biological and supports a wildlife corridor system.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	54	General Plan Conformance - Bonsall Community Plan	GOAL S-1 Adequate law enforcement, fire protection, and emergency services that contribute to a safe living and working environment for the residents of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	55	General Plan Conformance - Bonsall Community Plan	Policy S-1.1 Support the provision of adequate law enforcement, fire protection, and emergency services for the residents of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	56	General Plan Conformance - Bonsall Community Plan	GOAL N-1 Protect and enhance Bonsall's acoustical environment by supporting the control of noise at its source, along its transmission path and at the site of sensitive receivers. Maintain an environment free of excessive noise by providing control of noise at its source.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13
13	57	General Plan Conformance - Bonsall Community Plan	Policy N-1.1 Require site design and building design controls to minimize noise emissions from noise sources.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/11 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilao Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments						
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	
13	58	General Plan Conformance - Bonsall Community Plan	Policy N-1.2 Encourage land use and circulation patterns, which will minimize noise in residential neighborhoods and sensitive wildlife habitat.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	59	General Plan Conformance - Bonsall Community Plan	Policy N-1.3 Support limiting truck traffic to designated routes to reduce noise in residential areas.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	60	General Plan Conformance - Bonsall Community Plan	Section 6. Specific Plans and Special Study Areas.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	
13	61	General Plan Conformance - Valley Center Community Plan	The Background section of the Valley Center Community Plan indicates that the "2010 SANDAG estimates for population and housing in the Valley Center CPA identify a population of 17,562 with a total of 6,573 housing units." The project would further increase the population and total number of housing units within the community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13	

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PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (GPA), 3500 12-017 (STR), 3500 12-018 (STR)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	62	General Plan Conformance - Valley Center Community Plan	Community Character Goal Preserve and enhance the rural character of Valley Center by maintaining a pattern of land use consistent with the following regional categories. a. Village Enhance the rural village character of valley center's north and south villages defined by the current nodes of industrial, commercial and higher density village residential land use designations. b. Semi-rural lands preserve and maintain the overall rural and agricultural character of the semi-rural areas. c. Rural lands preserve and maintain the overall rural and agricultural character of the rural lands area outside the semi-rural area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	63	General Plan Conformance - Valley Center Community Plan	Figure 2, Valley Center Context Map.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	64	General Plan Conformance - Valley Center Community Plan	Community Character Policy 1: Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	65	General Plan Conformance - Valley Center Community Plan	Community Character Policy 2: Maintain the existing rural character of Valley Center in future developments by prohibiting monotonous tract developments. Require site design that is consistent with the rural community character.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (STP), 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments					
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	66	General Plan Conformance - Valley Center Community Plan	<p>Land Use</p> <p>General Goals</p> <p>Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained.</p> <p>A pattern of development that conserves valley center's natural beauty and resources, and retains valley center's rural character.</p> <p>A pattern of development that accommodates people of diverse ages, lifestyles, occupations, and interests with opportunities for village, semi-rural and rural living.</p> <p>Development that maintains valley center's rural character through appropriate location and suitable site design.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	67	General Plan Conformance - Valley Center Community Plan	Figure 3, Valley Center Village Boundaries	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	68	General Plan Conformance - Valley Center Community Plan	<p>A. Environmental Concerns and Issues:</p> <p>1. Require that discretionary permits preserve environmentally significant and/or sensitive resources such as undisturbed steep slopes, canyons, floodplains, ridge tops and unique scenic views in order to reinforce the rural character of the area through sensitive site design and, where appropriate, with open space easements.</p> <p>2. Require preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas.</p> <p>3. Prohibit ridgeline residential development unless it can be shown through a viewshed analysis that there would be only minimal impact to adjacent properties.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
 Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP)
 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005
 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	00	General Plan Conformance - Valley Center Community Plan	B. Rural Compatibility Issues: 4. Require new residential development to adhere to site design standards which are consistent with the character and scale of a rural community. The following elements are particularly important: • Roads that follow topography and minimize grading; • Built environment that is integrated into the natural setting and topography; • Grading that follows natural contours and does not disturb the natural terrain; • Structure design and siting that allows preservation of the site's natural assets; • Retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas. 5. Require new residential development to construct roads that blend into the natural terrain and avoid "urbanizing" improvements such as widening, straightening, flattening and the installation of curbs, gutters, and sidewalks. Follow Valley Center's Community Right of Way Development Standards. 6. Buffer residential areas from incompatible activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
 Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SF 003 (RE2), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	70	General Plan Conformance - Valley Center Community Plan	<p>Clustering</p> <p>7. Clustering, planned development, lot area averaging, and Specific Plan projects which utilize the clustering technique shall in no instance within the Valley Center CPA be used to create a greater number of lots than the property would have been entitled to without the use of the above mentioned techniques. Yield calculations shall be subject to the Resource Protection Ordinance.</p> <p>8. Once the appropriate number of lots has been established, the developer may elect to "cluster" or "lot area average" to lots of a minimum 0.5 acre in size in a Specific Plan Area Land Use Designation, no minimum lot size in the Village Area and a minimum lot size of 0.5 acre in size in SR-1, 1 acre in SR-2, 2 acres in SR-4, and 2.5 acres in SR-10 provided the project is sewerred, and providing that:</p> <p>a. The property contains significant environmental resources (such as important, rare, or endangered biological and/or animal habitat, floodplains, drainages, rock outcroppings, or archaeological and cultural resources) which would best be protected and preserved through the irrevocable dedication of these areas as Open Space easements to the County or another approved conservation agency.</p> <p>AND:</p> <p>b. Forty (40) percent of the gross acreage of the property is placed into permanent open space. Whenever possible, a link should be provided between all open space uses within the property.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	71	General Plan Conformance - Valley Center Community Plan	<p>Commercial Goals</p> <p>1. Prohibit strip commercial development by containing commercial uses in the Cole Grade Road and Valley Center Road area and the Mirar de Valle Road and Valley Center Road area.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilaac Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (S 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-003 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	72	General Plan Conformance - Valley Center Community Plan	2. Require new commercial development to comply with the Design Guidelines for Valley Center including, but not limited to, the retention of significant natural features characteristic of the community's landscape. Existing topography, land forms, drainage courses, rock outcroppings, vegetation and viewshed shall be incorporated in the design of the future development of commercial land via the "B" Community Design Area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	73	General Plan Conformance - Valley Center Community Plan	3. Ensure that all commercial areas are served by Mobility Element roads or local roads which meet the standards of the County of San Diego. Whenever possible, require new commercial development to provide secondary road access as opposed to access from major through roads.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	74	General Plan Conformance - Valley Center Community Plan	4. Commercial and civic uses shall be located in areas which have adequate roads for circulation and provide easy and safe multi-purpose pathways and trails.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	75	General Plan Conformance - Valley Center Community Plan	5. Future commercial development shall be planned so that strip commercial development will be avoided.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	76	General Plan Conformance - Valley Center Community Plan	6. Commercial/civic uses shall not interfere either functionally or visually with adjacent land uses or the rural atmosphere of the community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	77	General Plan Conformance - Valley Center Community Plan	7. Commercial/civic uses shall be periodically reviewed to ensure that the standards for noise, light, traffic, odors and all other conditions of approval are continuing to be met.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	78	General Plan Conformance - Valley Center Community Plan	8. Discourage commercial and civic uses outside of the Villages and limit all such uses to those that are clearly demonstrated as needed and which are compatible with the rural lifestyle of the Valley Center Community Plan.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
PROJECT ISSUE CHECKLIST

PROJECT NAME: Llac Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	79	General Plan Conformance - Valley Center Community Plan	9. The application of Land Use Designation Semi-Rural 2and Regional Category of Semi-Rural Lands are proposed for those properties that are currently zoned commercial and are located outside of the Villages.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	80	General Plan Conformance - Valley Center Community Plan	Agricultural Goals 1. Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	81	General Plan Conformance - Valley Center Community Plan	3. Prohibit residential development which would have an adverse impact on existing agricultural uses.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	82	General Plan Conformance - Valley Center Community Plan	Specific Plan Areas (SPA) section.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	83	General Plan Conformance - Valley Center Community Plan	Figure 4: Valley Center Generalized Specific Plans.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	84	General Plan Conformance - Valley Center Community Plan	Mobility Goals 1. Where appropriate, minimize private driveway and private road access on to Mobility Element roads.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	85	General Plan Conformance - Valley Center Community Plan	2. Road design shall reflect the rural character and needs unique to the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	86	General Plan Conformance - Valley Center Community Plan	3. Conflicting traffic movements such as uncontrolled access and uncontrolled intersections shall be minimized.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (RE2), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	87	General Plan Conformance - Valley Center Community Plan	4. Road alignment shall minimize the necessity of altering the landscape by following, as much as possible, the contours of the existing, natural topography without sacrificing safety or sight distance criteria.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	88	General Plan Conformance - Valley Center Community Plan	5. Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	89	General Plan Conformance - Valley Center Community Plan	6. Existing trees and vegetation located within the "Right-of-Way" of all public roads, and determined to be of significant visual benefit shall be transplanted or replaced consistent with the Valley Center Design Guidelines.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	90	General Plan Conformance - Valley Center Community Plan	7. To promote unimpeded traffic flow in commercial areas, minimize direct access points on to Mobility Element roads by recommending new commercial development to provide indirect access through the use of existing road access points, loop or frontage roads, common driveways or similar means.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	91	General Plan Conformance - Valley Center Community Plan	8. Woods Valley Road from Valley Center Road, east to Paradise Mountain Road and, Lilac Road from Old Castle Road to Highway 78 are significant aesthetic resources. Future improvements should maintain as much of their original character as possible without compromising safety.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	92	General Plan Conformance - Valley Center Community Plan	9. Require that the road system function at a service level no worse than "C" at peak hours as development occurs.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	93	General Plan Conformance - Valley Center Community Plan	10. Right-of-way development standards for private roads shall be compatible with the standards as outlined in Policy 6 of this section.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community
 Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	04	General Plan Conformance - Valley Center Community Plan	11. Implement community right-of-way development standards for the Valley Center Planning Area to achieve a rural character and alternative features within the shoulder portion of dedicated right-of-way. Such improvements will identify the community's desire to modify County development standards permitted by Board of Supervisors Policy J-36. These standards shall include: a. Provide decomposed granite walking/jogging paths in lieu of sidewalks; b. Where edge of pavement barrier is necessary, use mountable asphalt dike (smike dike); and c. Provide a bike lane within the "travel way".	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	05	General Plan Conformance - Valley Center Community Plan	12. Access to new subdivisions shall be carefully examined. Where a clear circulation need which benefits the overall community can be demonstrated, public roads consistent with Department of Public works policy shall be dedicated and constructed. Where appropriate, future subdivisions shall be required to access public roads via at least two separate access points.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	06	General Plan Conformance - Valley Center Community Plan	13. Safely separate pedestrian, equestrian and bicycle traffic from vehicular traffic when these modes share rights-of-way.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	07	General Plan Conformance - Valley Center Community Plan	Fire Protection Goals 1. All new development utilizing imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	08	General Plan Conformance - Valley Center Community Plan	3. New site locations for fire stations within the plan area should be centrally and strategically located.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

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PROJECT ISSUE CHECKLIST

PROJECT NAME: Lilac Hills Ranch Master Planned Community **Project Number(s):** 3800 12-001 (GPA), 3810 12-001 (S 003 (REZ), 3100 5574 (TM), 3100 5572 (TM), 3300 12-001 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	99	General Plan Conformance - Valley Center Community Plan	School Facilities 1. Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	100	General Plan Conformance - Valley Center Community Plan	2. Develop schools in conjunction with neighborhood and community recreation facilities.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	101	General Plan Conformance - Valley Center Community Plan	Water Service Goal 2. The delivery of imported water service to the CPA shall be coordinated and the infrastructure adequately sized so that service can be provided to all land within the Valley Center Municipal Water District Territory in a cost effective manner.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	102	General Plan Conformance - Valley Center Community Plan	Open Space Goals 3. Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	103	General Plan Conformance - Valley Center Community Plan	5. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	104	General Plan Conformance - Valley Center Community Plan	Parks and Recreation Goals 3. Development of local and neighborhood park and recreation facilities will be coordinated with local school facilities whenever possible by establishing Joint Powers Agreements to promote joint development, operation and maintenance.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	105	General Plan Conformance - Valley Center Community Plan	7. All park lands dedicated in conjunction with the development of a Specific Plan Area (SPA) land use designation will consist of a reasonable amount of flat land suitable for play fields and other similar local park activities.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

ATTACHMENT A
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PROJECT NAME: Libao Hills Ranch Master Planned Community
Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	106	General Plan Conformance - Valley Center Community Plan	8. Development of park facilities shall comply with the County's Ordinance No. 7155 relating to the regulation of Light Pollution.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	107	General Plan Conformance - Valley Center Community Plan	9. Provide riding and hiking trails, staging areas and other facilities within existing or proposed parks when appropriate to complement the Valley Center Trails System.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	108	General Plan Conformance - Valley Center Community Plan	Noise Goals 1. Develop and implement land use plans and circulation patterns that will minimize noise in residential neighborhoods.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	109	General Plan Conformance - Valley Center Community Plan	2. Permit residential development in areas with projected exterior Community Noise Equivalent Levels (CNELs) exceeding 60 decibels near main roads only when traffic noise impacts can be mitigated.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	110	General Plan Conformance - Valley Center Community Plan	3. Design subdivisions to retain natural and landscaped sound barriers in preference to earth berms or walls, where they are needed.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	111	General Plan Conformance - Valley Center Community Plan	4. Encourage the use of buffering devices on off-road vehicles and provide strict enforcement of noise regulations for off-road vehicles.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	112	General Plan Conformance - Valley Center Community Plan	5. Minimize traffic noise impacts by means of roadway alignment and design and the management of traffic flows.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	113	General Plan Conformance - Valley Center Community Plan	6. Encourage activities to increase public awareness of and enrollment in the Department of Agriculture program pursuant to the Agricultural Enterprises and Consumer Information Ordinance. (This Ordinance was designed to protect established farm operations from being declared a nuisance when following accepted agricultural practices.)	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13