

Letter C1k

GP Consistency part 2

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)

Growth Assessment – Valley Center, Bonsall

Valley Center and Bonsall bear more than a fair share of San Diego County General Plan growth before addition of the proposed Lilac Hills Ranch project -- infrastructure plans will not support Lilac Hills Ranch growth

The General Plan growth in housing units across the entire County of San Diego is summarized in Table X-Y below.

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Table X-Y San Diego County General Plan Housing Unit Forecast 2010-2050

C1k-1 The commenter makes a statement about the project relative to growth projections in San Diego County and that development should locate in the areas currently designated for future expansion in the General Plan.

Subchapter 4.1.1.1 of the FEIR analyzed the two sites designated in the Valley Center Community Plan for planned villages as an alternative project site. However, these two Villages reflect *existing* land use patterns and are designed to *complete* the existing community. These two were found to pose many constraints and disadvantages relative to the location of the proposed project, including encumbered emergency access and evacuation; greater potential VMT and associated GHG emissions due to the greater distance of these sites from regional facilities (e.g., transportation corridors, employment centers and shopping); and substantially greater constraints and impacts relative to traffic and required roadway improvements. (Subchapter 4.1.1.1 of the FEIR.) Whereas, General Plan Policy LU-1.2 permits new villages (like the project) that are consistent with the Community development model and meet the requirements set forth therein. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on related topic.

The two sites designated as “Village” by the Valley Center Community Plan pose many constraints and disadvantages relative to the location of the proposed project. The North and South Villages of the Valley Center Community Plan were considered in the FEIR in Chapter 4.0 and rejected as possible alternative locations for the proposed project. (The Valley Center Community Plan [“VCCP”] was adopted by the County on August 3, 2011, and is part of the San Diego County General Plan. The VCCP is incorporated by reference into this response.) Development in the suggested alternative Village locations would not avoid or lessen significant environmental effects of the project – in fact the alternative locations would result in some significant environmental effects that the project itself would not generate.

Implementing the proposed project in either alternative Village location would likely result in greater vehicle miles of travel (VMT) and in turn, greater operational GHG emissions than the project. The Villages are located well to the east of the proposed project and approximately 10 miles by road away from Interstate 15. (See FEIR, Chapter 4.0; see

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CPA	Housing Units				Percent Change			
	2010	2020	2030	2050	2010-2020	2020-2030	2030-2050	2010-50
Alpine	6,535	6,690	7,875	9,157	2.4%	17.7%	16.3%	40.1%
Barona	202	170	170	170	-15.8%	0.0%	0.0%	-15.8%
Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%	19.5%	58.7%
Central Mountain	2,182	2,305	2,589	2,735	5.6%	12.3%	5.6%	25.3%
County Islands	614	607	607	635	-1.1%	0.0%	4.6%	3.4%
Crest-Dehesa	3,562	3,677	3,926	3,978	3.2%	6.8%	1.3%	11.7%
Desert	3,546	3,453	4,337	6,923	-2.6%	25.6%	59.6%	95.2%
Fallbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jamul-Dulzura	3,234	3,372	4,398	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.8%	7.0%	17.8%
Lakeside	27,575	28,517	30,339	30,915	3.4%	6.4%	1.9%	12.1%
Mountain Empire	3,023	3,056	3,903	5,108	1.1%	27.7%	30.9%	69.0%
North County Metro	16,114	19,548	24,090	25,946	21.3%	23.2%	7.7%	61.0%
North Mountain	1,527	1,759	2,002	2,388	15.2%	13.8%	19.3%	56.4%
Otay	7	490	2,035	2,156	6900.0%	315.3%	5.8%	30700.0%
Pala-Pauma	1,980	2,285	3,037	4,389	15.4%	32.9%	44.8%	122.2%
Pendleton-De Luz	7,531	8,533	8,684	8,797	13.3%	1.8%	1.3%	16.8%
Rainbow	708	750	881	963	5.9%	17.5%	9.3%	36.0%
Ramona	12,376	12,692	14,107	15,140	2.6%	11.1%	7.3%	22.3%
San Diegoito	10,993	11,053	11,924	13,601	0.5%	7.9%	14.1%	23.7%
Spring Valley	20,533	20,939	21,837	21,952	2.0%	4.3%	0.5%	6.9%
Sweetwater	4,670	4,657	4,732	4,732	-0.3%	1.6%	0.0%	1.3%
Valle De Oro	15,543	15,648	16,022	15,968	0.7%	2.4%	-0.3%	2.7%
Valley Center	6,838	7,627	9,795	13,411	14.9%	28.4%	36.9%	102.0%
Unincorporated Area	170,608	180,431	202,882	222,890	5.8%	12.4%	9.9%	30.6%
San Diego County	1,158,076	1,262,488	1,389,807	1,529,090	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

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

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

Valley Center Housing Units as reflected in the August 2011 General Plan are growing 102% from 2010 to 2050, **more than 3 times** the rate of the County overall. This growth is largely in the North and South Villages, which are located where suitable infrastructure is (Roads, Sewers, Schools) located in Valley Center. Because there are provisions in the General Plan to provide the requisite infrastructure to support village land use densities areas, the central Villages located in the traditional town center is the logical place for Valley Center to provide more than its fair share of housing for the County.

Bonsall Housing Units as reflected in the August 2011 General Plan are growing 59% from 2010 to 2050, **nearly 2 times** the rate of the County overall. Growth is also planned at the traditional town center,

C1k-1 cont.

C1k-1 (cont.)

also VCCP Figures 2 and 3.) As discussed in FEIR Appendix E on pages 110-111, the VMT for the project is estimated to be less than that generated for the rest of the Valley Center community (including the Villages areas). In addition, the proposed development is projected to have an average vehicular trip length of 7.6 miles, which is over a half-mile lower than the average trip length for the rest of the Valley Center community. The reduction in VMT and vehicular trip length with the project compared to that related to the Villages will result in fewer operational GHG emissions. (See FEIR Appendix O, pages 65-66.)

Implementing the proposed project in either of the alternative locations would also likely result in greater traffic and transportation impacts. Both Villages are located adjacent to Valley Center Road. (See VCCP Figure 3.) Pursuant to the County of San Diego's General Plan Update Final Program EIR, Table 2.15-21, pages 2.15-79 to 2.15-80 (which Table 2.15-21 is incorporated by reference into this response), all of the segments of Valley Center Road near the Villages (from Sunday Drive to Paradise Creek Road) would operate at an LOS E or F (failing) at build-out. The significant impacts caused by the deficient level of service for Valley Center Road (a mobility element road) at buildout could not be avoided even after implementing a range of mitigation measures. And further mitigation measures were deemed to be infeasible due to corresponding significant adverse impacts to important habitats, archeological sites and established communities, as well as the significant costs of potential road improvements. (See County of San Diego General Plan Update Final Program EIR, pages 2.15-42 to 2.15-43, which pages are incorporated by reference into this response.) The proposed project does not cause significant impacts to a Mobility Element road, such as Valley Center Road, but implementing the project in one of the Village areas (if even possible) would result in such significant impacts. Accordingly, implementing a village development within either of the Village areas would likely result in substantially greater traffic impacts than those associated with the project, since existing roadway infrastructure in the VCCP area around the Villages would not support large increases in traffic intensity and still maintain acceptable levels of service.

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Valley Center and Bonsall bear more than a fair share of San Diego County General Plan growth before addition of the proposed Lilac Hills Ranch project -- infrastructure plans will not support Lilac Hills Ranch growth

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Table X-Y San Diego County General Plan Housing Unit Forecast 2010-2050

C1k-1 (cont.)

C1k-1 (cont.)

In addition, implementing the proposed project in either Village area would likely result in significant adverse impacts regarding wildland fire hazards compared to those of the project. The VCCP and related Village areas are part of the San Diego County General Plan Update. The County of San Diego’s General Plan Update Final Program EIR determined that, even with mitigation measures in place, development under the General Plan Update would not reduce impacts associated with wildland fires to below a significant level. Additional mitigation measures that would fully reduce impacts to below a level of significance were determined to be infeasible. (See County of San Diego’s General Plan Update Final Program EIR, pages 2.7-57 to 2.7-58, which pages are incorporated by reference into this response.) Alternatively, as explained in subchapter 2.7 of the FEIR, after implementation of mitigation and design features, the project’s impacts related to wildland fires is reduced to less than significant.

Further, implementing the proposed project in either Village area would not be feasible under CEQA Guidelines Section 15126.6(f)(2)(B). As shown on VCCP Figure 3, each Village area is only approximately one square mile in size. One square mile contains 640 acres. Consequently, the project applicant would need to acquire nearly every legal parcel within an entire Village area to assemble the 608 contiguous acres for a development project substantially similar to Lilac Hills Ranch. It would be nearly impossible to assemble such acreage given the active uses and occupied parcels within both of the Villages areas. (See VCCP Figure 3.) The North Village area also contains a large amount of public agency lands, which would be difficult to acquire. (See VCCP Figure 3.) Further, neither of the Village areas contains a significant inventory of land that is designated for high-density residential development to accommodate the 1,746 proposed residential units for Lilac Hills Ranch. (See VCCP Figure 3.) Consequently, it is not reasonable to suggest that either Village area would be a feasible alternative location for the proposed project. Two alternative sites designated as Village in the Valley Center Community Plan were considered and addressed in subchapter 4.1.1.1 of the FEIR. However, these sites were rejected for a number of reasons.

Both Villages are located adjacent to Valley Center Road. Pursuant to the County General Plan FIER, table 2.15-21, all of the segments of Valley Center Road near the Villages (from Sunday Drive to Paradise Creek Road) would operate at an LOS E or F (failing) at buildout. Only

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C1k-1 cont.

C1k-1 (cont.)

one segment of Valley Center Road (Miller Road to Indian Creek Road) would be permitted to operate at an LOS F at buildout, pursuant the General Plan Mobility Element Network Appendix for Valley Center. Therefore, improvements would be necessary to increase capacity to local roadways to serve the two Village sites in the Valley Center Community Plan, which would likely result in other significant impacts (biological, cultural, etc.). Thereby, this alternative site location would not reduce any traffic – or likely other - impacts associated with the project.

LETTER

RESPONSE

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close to the intersection of SR-76 and Mission Road, where necessary infrastructure for dense, urban development is in either on the ground or planned (and funded) to be added shortly.

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

Table Y-Z Bonsall and Valley Center Composite Housing Unit Analysis

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

C1k-1 cont.

C1k-2

C1k-2 This comment does not address the environmental analysis provided in the project EIR. The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider.