

Letter C2a

BONSALL COMMUNITY SPONSOR GROUP

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July 27, 2014

TO: Mark Slovick, Planning Manager, Lilac Hills Ranch Project
Department of Planning & Development Services County of San Diego

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

Executive Summary: Lilac Hills Ranch DEIR Responses from the Bonsall Sponsor Group

You will find that some of the text to be similar to Valley Center's submission however, Bonsall has many more questions

The Bonsall Community Sponsor Group has been grappling with this project over many months (years). In our minds it is a bad ill conceived community busting project that should never have been brought forth to be examined in the light of day. Both the Bonsall and Valley Center planning groups have invested too many hours in trying to analyze a project that has so many flaws that more questions have been created than can possibly ever be plausibly answered.

This is the way I started the Executive Summary of the August 17, 2014 and not much has changed with the project or maybe I should be honest and say it is worse.

The thousands of pages that make up the RDEIR documents and their sometimes very technical nature made it difficult for volunteers to review and respond to every item in the relatively short time allowed. However, the principle issues are addressed in some detail in the responses that accompany this summary.

This summary does not substitute for the detailed comments and analyses presented in the email attached comment documents dated July 27, 2014.

The County needs to disclose the following information so that impacts are identified and required Mitigation can be implemented.

Required Disclosure of Relevant Information regarding legal rights for construction of Off Site Improvements as well as how the Applicant intends to gain legal rights

In the DEIR, the County has not provided adequate disclosure regarding off-site impacts of the Project and its Alternatives to surrounding property owners.

This information is necessary to demonstrate Project Feasibility that the Project can ever be legally built.

C2a-1

C2a-2

C2a-1

C2a-2

Introductory comment is noted. Detailed responses follow.

See response to comment C1d-11.



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THIS SECTION NEEDS A SUCCINCT DISCUSSION OF THE PROJECT'S FACTUAL LACK OF LEGAL RIGHT OF WAY FOR ROADS, SEWER, AND RECYCLED WATER. FACTUAL AND QUANTITATIVE DISCUSSION NEEDS TO BE MADE PROMINENTLY APPARENT TO DECISION MAKERS ON HOW OFFSITE IMPROVEMENTS REQUIRED FOR THIS PROJECT WILL BE ACQUIRED. THERE ARE FACTUALLY 30 OR MORE RIGHT OF WAY ACQUISITIONS THAT PROJECT REQUIRES. THE PROJECT HAS MADE LITTLE PROGRESS IN FOUR YEARS ON ACQUIRING REQUIRED RIGHT OF WAY. IT IS HIGHLY LIKELY THAT THE USE OF EMINENT DOMAIN FOR A MINIMUM OF THIRTY AND LIKELY GREATER NUMBER OF SEPARATE TAKINGS OF UNWILLING PROPERTY OWNERS' LAND OR INTEREST IN ROAD AND UTILITY EASEMENTS WILL BE REQUIRED TO MAKE THIS PROJECT FEASIBLE.

C2a-2
cont.

For the Project and each of its Alternatives, provide the following information regarding off-site improvements for which Accretive Investments currently holds less than full legal right of way. For each impacted parcel, indicate what the Applicant has done to attempt to secure legal rights. Disclose how the Applicant or the County intends to secure the necessary legal rights for these parcels:

<u>Parcel Number</u>	<u>Property Owner</u>	<u>sq ft. Right of Way required</u>	<u>sq.ft.Slope Easement</u>	<u>Total sq. ft. Encroachment</u>
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i) West Lilac Road

Scenario 1 – Construction of West Lilac Road from Old Hwy 395 to proposed new Road 3b to 2.2 C Road Standards as is the General Plan Baseline. No information on offsite improvements has been provided by the County for the full route of this Alternative, which is the present General Plan Mobility Element baseline.

C2a-3

C2a-3

See response to comment C1d-12.

Scenario 2 a – As per "Right of Way Analysis W. Lilac Rd Alt 1 2.2C/2.2F dated Oct 31, 2013 with additional land necessary to incorporate Reid Middleton Roundabout design modification recommendations identified.

C2a-4

C2a-4

See response to comment C1d-13.

The Oct 31, 2013 study found that 22 parcels were impacted for a total of 4.3 acres. The Study did not quantify the additional parcels impacted by Roundabout redesigns recommended by Reid Middleton. Please include a current and accurate disclosure of the parcels as impacted by Roundabout redesign.

C2a-5

C2a-5

See response to comment C1d-13.

Scenario 2 b – As per "Right of Way Analysis W. Lilac Rd Alt 1 2.2 C dated Oct 31, 2013 with additional land necessary to incorporate Reid Middleton Roundabout design modification recommendations identified. The Oct 31, 2013 study found that 22 parcels were impacted for a total of 5.6 acres. The Study did not quantify the additional parcels impacted by Roundabout redesigns recommended by Reid Middleton. Please include a current and accurate disclosure of the parcels as impacted by Roundabout redesign.

C2a-6

C2a-6

See response to comment C1d-14.



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Scenario 3 – Impact of improvement from non-compliant 2.2F to 2.2E configuration to improve horizontal curves and provide bicycle lanes in each direction and 8 foot shoulders for West Lilac Road from Easterly boundary of Subdivision (currently near existing Lilac Walk private road intersection) to Covey Lane. This scenario is discussed further in section 2).Direct Impacts to West Lilac Road section of this letter.

ii). Covey Lane/West Lilac Intersection

Scenario 1 – Impact of construction to Applicant’s proposed design including **Sight Distance Clearance and turn tapers. Please carefully analyze the need for Additional Slope Easements beyond those granted in IOD’s.**

iii). Mountain Ridge Private Road including Mountain Ridge/Circle R Intersection

Scenario 1 – Impact of improvement to Applicant’s proposed design including **Sight Distance Clearance and turn tapers.**

Scenario 2 – Impact of improvement of Mountain Ridge Private Road to 30 Mph Private Road Design Speed Standards including **Sight Distance Clearance and turn tapers.**

Scenario 3 – Impact of construction of Mountain Ridge Private Road to Public Road Design Standards including **Sight Distance Clearance and turn tapers.**

iv). **Rodriguez private road.** Please further enumerate the all improvements proposed for Rodriguez Road as represented in Master Preliminary Grading Plan TM 5571 RPL 4 Sheet 7 of 12. Provide the legal basis of rights to construct the improvements to Rodriguez Road. Provide a copy for Public Review of document 2013-0021800 Rec. 1-11-2013.

Property Rights ARE a DEIR Issue. Without the acquisition of land for offsite improvements, this Project IS INFEASIBLE.

The County of San Diego has received hundreds of pages of factual information from multiple Attorneys that demonstrate the absence of many legal rights for the Project’s intended use of private roads and right of way for Sewer and Recycled water utility pipelines.

- C2a-7
- C2a-8
- C2a-9
- C2a-10
- C2a-11
- C2a-12
- C2a-13

- C2a-7 See response to comments C1d-11, C1d-13, and C1d-14.
- C2a-8 See response to comment C1d-16.
- C2a-9 See response to comment C1d-17.
- C2a-10 See response to comment C1d-17.
- C2a-11 See response to comment C1d-17.
- C2a-12 See response to comment C1d-18.
- C2a-13 See response to comment C1c-68.



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The County has taken the position that Private Road right of way disputes are between individual private parties. That said, the County of San Diego has certain knowledge that offsite road improvements for the Project will require right of way for at least thirty separate takings of unwilling property owners' land or interest in road easements.

C2a-14

The County has not been clear about Public information on required right of way for Offsite Improvements for assessment of Environmental Impact. We ask that the County provide the following information:

C2a-15

The County needs to disclose the following information so that impacts are identified and required Mitigation can be implemented.

Required Disclosure of Relevant Information regarding legal rights for construction of Off Site Improvements as well as how the Applicant intends to gain legal rights

In the DEIR, the County has not provided adequate disclosure regarding off-site impacts of the Project and its Alternatives to surrounding property owners.

This information is necessary to demonstrate Project Feasibility that the Project can ever be legally built.

C2a-16

For the Project and each of its Alternatives, provide the following information regarding off-site improvements for which Accretive Investments currently holds less than full legal right of way. For each impacted parcel, indicate what the Applicant has done to attempt to secure legal rights. Disclose how the Applicant or the County intends to secure the necessary legal rights for these parcels:

<u>Parcel Number</u>	<u>Property Owner</u>	<u>sq ft. Right of Way required</u>	<u>sq.ft.Slope Easement</u>	<u>Total sq. ft. Encroachment</u>

C2a-14 Please see Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and Off-site Improvements - Environmental Analysis and Easement Summary Table, for additional information responsive to this comment.

C2a-15 and C2a-16 Please see Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and Off-site Improvements - Environmental Analysis and Easement Summary Table, for additional information responsive to this comment.



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PHASING

Phasing – The Applicant seeks the utmost in flexibility in developing the Project in Phases of which there are many possible permutations, and no assurance whatsoever of Project performance of Conditions of Development.

The County has endorsed this approach without any assurance of performance by the Applicant, such as bonded indemnification to ensure specific performance.

The Applicant states in the Specific Plan and the County states in the RDEIR that some Phases may never be built. Mitigations for Traffic Impacts are tied to events that may never happen.

This is a serious defect with the RDEIR. There is no assurance that promised Mitigation will ever occur.

Refer to the following Table 1 – 4 from Chapter 1 EIR Objectives page 1- 34.

**TABLE 1-24
GRADING QUANTITIES BY PHASE (cy)**

Phase	Cut	Fill	Net
1	715,000	860,000	(145,000)
2	635,000	830,000	(195,000)
3	1,815,000	1,260,000	555,000
4	295,000	420,000	(125,000)
5	610,000	700,000	(90,000)
TOTAL	4,070,000	4,070,000	-

The Project represents that it requires no import or export of soil for all Phases in total. The Project requests any possible Phase implementation sequence. It is **clear** that Phase 3 is the source of fill dirt **for all of the other four Phases** and is required to be at least partially graded concurrently with the first and any other Phase. Please identify how the Project intends to implement Phase 1 without grading on Phase 3. Also, will Phase 3 be used as a quarry for fill dirt for an extended period?

The County of San Diego is deficient for not recognizing this most basic disconnect. The net result of this is a Significant Impact of Project Feasibility.

This example of infeasibility or vastly different Environmental Impacts is repeated over and over again with every Infrastructure aspect: Roads, Sewers, Waste Water, etc.

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C2a-17

C2a-17 See response to comment C1c-69.

C2a-18

C2a-18 See response to comment C1c-69.

C2a-19

C2a-19 See response to comment C1c-70.

C2a-20

C2a-20 See response to comment C1c- 71.

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The timing of implementation of Mitigation is also required to be defined with much more rigor than the County has employed. Road Improvement from Significant Impacts are 'triggered' by attainment of a threshold number of Residential Units. The County of San Diego should recognize that certain Commercial Land Uses are far greater drivers of Traffic Impacts than Residential.

C2a-21

C2a-21 See response to comment C1c-72.

Another related defect of this "Phase Game" is that the sum of the Traffic related analyses, for example, have analyzed fewer than 50% of the possible permutations of Phase execution that the County has endorsed in this EIR.

C2a-22

C2a-22 See response to comment C1c-72.

Left with the unbounded Phasing strategy the Applicant proposes, the Project as implemented will have vastly different Environmental Impacts than those analyzed in this EIR.

C2a-23

C2a-23 See response to comment C1c-73.

The Project needs to be required to adopt a defined Phasing Plan sequence with only a few allowable Phase Alternates in order that the proper Environmental Impacts can be assessed.

Project Objectives

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

C2a-24

C2a-24 See response to comments C1c-2 through C1c-36 for details on the adequacy of the project objectives..

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



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- 6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.
- 7. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

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

Objective One

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

Objective Two

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

Objective Three

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

Objective Four

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

Objective Five

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

Objective Six

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

Objective Seven

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

The Applicant states in the Specific Plan and the County states in the EIR that some Phases may never be built. Mitigations for Traffic Impacts are tied to events that may never happen. This is a serious defect with the EIR. There is no assurance that promised Mitigation will ever occur.

C2a-24
cont.

C2a-25

C2a-25 See response to comments C1c-72 and C1c-73.



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Refer to the following Table 1 – 4 from Chapter 1 RDEIR Objectives page 1- 34.

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The County of San Diego is deficient for not recognizing this most basic disconnect. The net result of this is a Significant Impact of Project Feasibility. This example of infeasibility or vastly different Environmental Impacts is repeated over and over again with every Infrastructure aspect: Roads, Sewers, Waste Water, etc.

The timing of implementation of Mitigation must also be defined with much more rigor than the County has employed. Road Improvements from Significant Impacts are 'triggered' by attainment of a threshold number of Residential Units. The County of San Diego should recognize that certain Commercial Land Uses are far greater drivers of Traffic Impacts than Residential.

Another related defect of this "Phase Game" is that the sum of the Traffic related analyses, for example, have analyzed fewer than 50% of the possible permutations of Phase execution that the County has endorsed in this EIR.

Left with the unbounded Phasing strategy the Applicant proposes, the Project as implemented will have vastly different Environmental Impacts than those analyzed in this EIR.

C2a-26

C2a-27

C2a-28

C2a-29

C2a-26 See response to comment C2a-19.

C2a-27 See response to comment C2a-20.

C2a-28 See response to comment C2a-21.

C2a-29 See response to comments C2a-22 and C2a-23.



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The Project needs to be required to adopt a defined Phasing Plan sequence with only a few allowable Phase Alternates in order that the proper Environmental Impacts can be assessed.

C2a-29
cont.

Project Inconsistencies with Regional and General Plans

In comments submitted over the last two years, 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.

C2a-30

C2a-30 See response to comment C1c-77.

Our previous comments, which have been submitted separately, have also challenged the logic exhibited throughout Accretive Investment Group's Specific Plan and now in their Revised Draft Environmental Impact Report (RDEIR): 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 RDEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences as CEQA requires. The RDEIR is derelict in concluding as it does that: "The proposed project includes a General Plan Amendment, which if approved, would result in the project being consistent with the General Plan" (Chapter 3 Environmental Effects Found Not To Be Significant, p. 3-87). An Amendment to the General Plan should not mitigate the serious environmental impacts of this Project.

C2a-31

C2a-31 See response to comment C1c-78.

This RDEIR 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 RDEIR has only a rudimentary matrix of so-called Consistency with the General Plan in appendix W. However, the serious and unbiased analysis of consistency with the General Plan and the Community Plans has not been produced.

C2a-32

C1a-32 See response to comment C1c-78.

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

C2a-33

C1a-33 See response to comment C1c-78.



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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.

C2a-34

C2a-34 See response to comment C1e-4.

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

C2a-35

C2a-35 See response to comment C1e-5.

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 RDEIR 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.

C2a-36

C2a-36 See response to comments C1e-6.

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.

C2a-37

C2a-37 See response to comment C1e-7.

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

C2a-38

C2a-38 See Appndix W of the FEIR for a full analysis of the project's consistency with the County's General Plan and Community Plan policies.



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LETTER

RESPONSE

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

C2a-39

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

C2a-40

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

C2a-41

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

C2a-42

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

C2a-43



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C2a-39 With respect to protection of riparian habitats, see FEIR subchapter 2.5, including the discussion of the project's on-site open space. See also, response to comments C1d-106 through C1d-108. For a discussion of the project's protection against edge effects, see response to comments C1d-121 through C1d-123.

C2a-40 See response to comments C1d-132 through C1d-134.

C2a-41 The FEIR appropriately analyzed all project impacts together and the FEIR does not piecemeal the project as the commenter suggests. Due to the variation between archaeological sites and the CEQA criteria for determining significance, each individual archaeological site must be evaluated for significance individually and, if necessary, mitigation must be developed specifically for each archaeology site. The analysis evaluates the entire site and off-site improvement areas as a whole and, as this comment points out, in the context of the cumulative study area.

As indicated in the FEIR, the project would preserve all known on-site resources that meet the CEQA significance criteria. The FEIR identifies potentially significant impacts to unknown resources and an off-site site CA-SDI-5072 and identifies mitigation (M-CR-2 and M-CR-3) for those potential impacts. The importance of cultural resources under CEQA is tied to the archeological information the resources have. The proposed mitigation includes curating or, as appropriate, repatriating recovered materials. Also, documentation of the sites would be archived at the South Coastal Information Center (SCIC) that serves to make the information available to future researchers, so that associations with other sites and the overall area can be better addressed. As the proposed preservation and project mitigation preserves the archeological resource information for the future, the project's impacts are considered mitigated to below a level of significance.

C2a-42 See response to comment C2a-41.

LETTER

RESPONSE

	<p>C2a-43 If the comment is addressing the methodology of the survey and testing program, a cultural resources survey and testing program was conducted specifically for the project and did not rely on previous studies; this is addressed in detail in the cultural resources technical report and the FEIR. The standard methodology of transect spacing was used in the archaeological surveys that were performed at the project site. The archaeologists thoroughly checked bedrock outcrops, cut banks or other exposed soil profiles, and other high-potential areas during the surveys and evaluation. No comments have been expressed by the Tribes disagreeing with the methodology that was used. Previous studies of the area were addressed in the report to provide background for understanding the cultural resources within the project area; these in no way replaced the project-specific studies conducted. Again, this information is detailed in the cultural resources technical report and in the FEIR.</p> <p>If the comment is addressing the methodology of the data recovery program that had been proposed at CA-SDI-20,436, that is no longer relevant. The site will be preserved in a permanent open space easement, and an active preservation plan has been prepared. No data recovery will be undertaken at this site, as the project will have no impacts to it.</p>
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The development of the densely packed Project adjacent to agricultural areas presents the need to buffer which is included in the Bonsall Sponsor Group Community Plan those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion in this subchapter of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used. The RDEIR instead chooses to address buffers against hazardous materials in the 2.4 Agricultural Resources subchapter. Perhaps it seems like more of an agricultural problem in that context than a problem caused by poorly placing an urban development in an agricultural context.

C2a-44

The proposed wastewater recycling facility [WRF], if built will be using hazardous materials, such as chlorine, in its treatment process. The facility is only 686-feet from the proposed school site and only 250-feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the conclusion that the risks from the use of toxic, hazardous materials are less than significant is overly optimistic, even under carefully controlled circumstances.

C2a-45

The WRF will not be built to coincide with the earlier phases of the Project, requiring that sewage be trucked off-site for disposal. The same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project? Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.

C2a-46

The issues of emergency response and evacuation plans are troublesome for this Project. The Evacuation Plan does not address the most fundamental evacuation issue of the proposed Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed Project. The mobility element roads nearest the Project are West Lilac and Circle R Roads. Both roads were built as 2.2 E two-lane roads to serve a rural community with small, rural populations and the applicant plans no upgrades to these roads. The addition of 5000+ people at the Project site will severely impact both emergency response and evacuation during a crisis event, exacerbating already congested conditions in such circumstances and putting many people at risk.

C2a-47

C2a-44 Significant impacts associated with agricultural adjacency issues are addressed in the FEIR subchapter 2.4. Mitigation measures are required to buffer on-site residential and other uses from off-site agricultural operations which, in some cases, include pesticide usage. The FEIR was revised to direct the reader to the Agricultural Resources section for a full evaluation of the project's compatibility with off-site agricultural operations including a discussion of adjacency areas and off-site spraying. As determined by the analysis provided in the FEIR, the project design features combined with the required mitigation is adequate to protect future residences with adjacency issues. See also, Appendix W, regarding the project's consistency with General Plan policies.

C2a-45 See response to comment C1d-150.

C2a-46 See response to comment C1d-151.

C2a-47 See response to comments C1d-158 through C1d-162.



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The applicant would further impact evacuation plans by proposing 10 road standard modifications that would lower the classification of the mobility element roads in some cases, lower the design speeds of those roads and assign some mobility element road segments to the list for failing roads with no beneficial mitigation possible. With lower design speeds, narrower roadways and immitigable LOS issues, the Project will imperil evacuations from Bonsall and Valley Center to the I-15 corridor by existing residents, and impede the prospective residents of the Project at the same time. This kind of impact, played out in scenarios like Bonsall and Valley Center experienced in 2003 and 2007, would severely and significantly put hundreds of people at risk. Further, the Project has but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. There are no plans to upgrade this road. If an evacuation event is caused by a large wildfire from the west, a panic evacuation will result over a single narrow, winding road made treacherous by the ensuing smoke plume.

C2a-48

C2a-48 See response to comments C1o-8 and C1o-9.

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

C2a-49

C2a-49 Please refer to Global Response: Fire and Medical Services.

The Project is proposed for a site in a very high fire hazard severity zone [FHSZ]. Locating a Project of this size and scope in a very high FHSZ is not a smart location that is consistent with preventive land use planning. The RDEIR states that failure to meet the standard 100-foot Fuel Modification Zone [FMZ] for significant portions of the Project would be a significant impact. . Section 5.4 Fuel Management Zones on page 54 of the FPP states "The project includes a few areas where fuel modification zones are less than 100 feet wide." Based on even a quick scan of Figure 1.6 from Chapter 1 of the RDEIR, the more accurate and true statement is: The project includes extensive areas where fuel management zones are less than 100 feet wide. This is a severe design flaw.

C2a-50

C2a-50 See response to comment C1d-155.

Fire Protection Plan (FPP)

The proposed Project FPP does not meet the following basic requirements identified below by Issue Number:

C2a-51

C2a-51 See response to comment I51i-s and refer to Global Response: Fire and Medical Services.

1. Of the four Fire Station site Options proposed by the Applicant, none meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Charter of the DSFPD focuses on providing no greater than 5-minute emergency response time to the ENTIRE DSFPD, of which the proposed LHR Project is a subset.
2. The Applicant states in the FPP that the LHR Project fully complies with the DSFPD Ordinance No. 2010-01, County of San Diego Consolidated Fire Code, and County of San Diego Public and Private Road Standards. *The LHR has factual compliance issues with all of these regulations.*

C2a-52

C2a-52 Please refer to Global Response: Fire and Medical Services.



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- 3. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address either Structure Fires or Emergency Medical Service (EMS).
- 4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.

Fuel Modification Zones (FMZ) – The applicant appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100 foot FMZ requirement which is against California State Fire Code and the County Fire Code.

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

The movement of over 4-million cubic yards of dirt and rock on the Project site is perhaps the most obvious irreversible impact. Another is the loss of hundreds of acres of productive agricultural land for future production. Another is the loss of significant amounts of biological habitat and the flora and fauna that presently occupy them. The RDEIR does not adequately address the cumulative impact of scores of such individual losses caused by multiple projects within the County and the irreversible loss of the majority of native habitats in the aggregation of those individual losses. Why are such losses necessary when alternatives that have dramatically less environmental impact are available to achieve the Project's myopic objectives?

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

Geology and Supplemental Geology Report

The review identifies questions regarding the need for blasting for cuts that exceed 50-feet in depth to facilitate the movement of over 4-Million cubic yards of dirt and rock. Given the phasing of the project, Silicates will be a potential hazard relative to the AQMD standards for a period of as much as 10-years or even longer.

Slope Stability and Remediation describe cut slopes (6.2.1) and fill (manufactured slopes 6.2.2) in excess of seventy-feet (70-feet) in height. There are no seventy-foot high manufactured slopes existing in this community, which makes these proposed slopes out of character with the community.



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C2a-53

C2a-54

C2a-55

C2a-56

C2a-57

C2a-58

C2a-59

C2a-60

C2a-61

C2a-53 See response to comment I51i-11 and I51i-12.

C2a-54 It is not the intent nor purpose of the FPP to analyze environmental impacts, that is the intent and purpose of the EIR. All impacts of the proposed project and project alternatives are disclosed and where feasible, mitigation will be required that avoids and/or minimizes negative impacts. See response to comment I51i-15.

C2a-55 See response to comment I51i-16.

C2a-56 See response to comment I51i-16.

C2a-57 Refer to Global Response: Fire and Medical Services; Global Responses: Easements (Covey Lane and Mountain Ridge Roads) and Off-site Improvements - Environmental Analysis and Easement Summary Table, for additional information responsive to this comment.

C2a-58 and C2a-59: See responses to comments C1p-1 through C1p-10 regarding Irreversible impacts of the project.

C2a-60 and C1a-61 See responses to comment C1q-3. Silicates are discussed in FEIR subchapter 2.2. Specifically, the analysis states that silicate levels due to construction of the project would be less than those associated with the studied Azusa Rock Quarry. Therefore, in the absence of additional empirical evidence specific to construction projects, it is anticipated the project would generate concentrations of crystalline silica lower than the OEHHA REL of 3 µg/m³. Thus, construction and blasting activities from the project are expected to have impacts that are less than significant due to crystalline silica.

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

- 1. No Project/No Development Alternative
- 2. No Project / Existing Legal Lot Alternative (49 EDU + no commercial)
- 3. General Plan Consistent Alternative (110 EDU + no commercial)
- 4. Reduced Footprint Alternative (1251 EDU + 6 acres of commercial)
- 5. Reduced Intensity Alternative (881 EDU + 5.6 acres of commercial)
- 6. 2.2C (Hybrid) Alternative (1365 EDU + 15.3 acres of commercial)
- 7. Roadway Design Alternative (1746 EDU + 17.3 acres of commercial)
- 8. Mountain Ridge Road Fire Station Alternative (1746 EDU +17.3 acres of commercial)

C2a-62

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

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

C2a-63

C2a-64

C2a-65

C2a-66

C2a-67

C2a-68



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C2a-62 See response to comment C1f-3.

C2a-63 The project objectives, developed by the applicant, are compliant with CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project.

C2a-64 Please refer to response to comment C1s-3.

C2a-65 Please refer to response to comment C1s-11.

C2a-66 Please refer to response to comment C1s-12.

C2a-67 Please refer to response to comment C1a-13.

C2a-68 The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider. No additional response is necessary.

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Table 1 -Scant Attributes of 3 Alternates Provided

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

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

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

C2a-69

C2a-69

Please refer to response to comment C1s-12.

This is of course the best of all of the alternatives as it meets the LEED ND requirements and all other logical building as it meets the need of the Escondido Specific Plan.



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TABLE 2 - COMPARISON TO PROJECT OBJECTIVES

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

C2a-70

C2a-70 Refer to response to comment C1s-13.

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

More importantly, the General Plan alternative must be properly considered by the applicants and County, rather than focus their attention strictly within the boundaries of the Project. Apart from the time and money already spent developing the General Plan [12 years and \$18.6 million], it was designed as a plan for the entirety of the County's unincorporated area while being mindful of the incorporated cities as well. The Lilac Hills Ranch Project is only a single piece of a much larger puzzle.

C2a-71

C2a-71 The General Plan Consistency Alternative is considered among the project's reasonable range of alternatives. As discussed in FEIR subchapter 4.4. Development at the existing General Plan densities would not meet most of the other project objectives. It would not allow for a walkable community, would not include any commercial/retail services, and would not provide for a diverse types of housing, all of which are achieved in the Village-style design of the project. The FEIR does consider development at General Plan densities, as described in FEIR subchapter 4.4, Analysis of the General Plan Consistent Alternative. The FEIR concludes that the General Plan Consistency Alternative would result in fewer impacts to agricultural impacts as compared to the project.



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

- I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley.
- II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife among other functions.

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

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

Specific Plan

The comments on the Specific Plan include several major concerns:

- 1. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.
- 2. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure. Several Mobility Element Road segments associated with the Project will be allowed to sink to LOS E/F without mitigation because there wouldn't be commensurate benefit realized by adding lanes.

C2a-71

C2a-72

C2a-73

C2a-72 The project is proposing a new "Village" and requires a General Plan land use map amendment from Semi-Rural to Village, and would modify the land use designations in the Valley Center Community Plan and the Bonsall Community Plan. General Plan Policy LU-1.2 permits new villages that are consistent with the Community Development Model and meet the requirements set forth therein. Please see Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion regarding this the projects' compliance with this Policy.

The project has been designed with the highest intensities (commercial, mixed-use and attached residential) within the central portion of the project (Town Center) and the lower-intensity residential uses around the perimeter of the site (single-family detached residential uses.) Section 3.1.4.2 evaluated the Project's compatibility with surrounding off-site land uses. Compliance with the project's design guidelines and other provisions of the Specific Plan will ensure the project's compatibility with the adjacent off-site land uses. Overall, the project is consistent with the relevant policies of both the Bonsall Community Plan and Valley Center Community Plan and land use impacts associated with policy inconsistencies would be less than significant. Also, as detailed in the Agricultural Resources Report (see Appendix F of the EIR), one of the project's objectives includes the recognition of the existing rural atmosphere of the surrounding area through use of



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	<p>C2a-72 (cont.)</p> <p>agriculture on-site and provision of transitional features to provide adequate buffering between types of residences and active agriculture. The Specific Plan includes agriculture throughout the project site including common open space areas, biological open space, and manufactured slopes. HOA-maintained agricultural open space would be retained along many of the boundaries of the project site, as agricultural compatibilities buffers including groves of orchard trees, such as avocado and citrus. Other agricultural-related commercial uses may also be established by the project as allowed in the C-36 zones. Project grading would conform to the natural contours of the land and would not substantially alter the profile of the site.</p> <p>C2a-73</p> <p>Impacts to roads are adressed in FEIR subchapter 2.3. As discussed therein, the proposed modifications would not result in decreased capacity on the surrounding roads. For roads in which impacts would occur, mitigation is proposed to reduce those impacts to less than significant levels, except for locations where such mitigation is infeasible. (See, FEIR Table S-1). With respect to allowance of West Lilac Road to operate below standard, the proposed General Plan Amendment would allow the road to be downgraded to a classification 2.2F and be added to Mobility Element Table M-4 (roads operating below acceptable levels of service). See, FEIR subchapter 2.3.3.2 . It should also be noted that the project is forecasted to add 15,151 ADT external trips, as stated in Table 4.8 of the TIS.</p>
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3. Compliance with the General Plan. The Project's Specific Plan threatens to overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, over \$18 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. If this Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.

C2a-74

C2a-74 See response to comment C1t-8.

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

C2a-75

C2a-75 See response to comment C1t-9.

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

C2a-76

C2a-76 See response to comment C1t-9.

6...LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as "designed to meet the standards of the LEED-ND or an equivalent program." There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.

C2a-77

C2a-77 See response to comment C1t-10.



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7.The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The 'community' that needs to be addressed is the Valley Center community, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Bonsall and Valley Center communities and the zoning and land use patterns within Bonsall and Valley Center are consistent with that model. The proposed addition of the LHR Project in the western portion of the Valley Center community and the east portion of the Bonsall community flouts the intention of the Community Development Model by establishing high-density development away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.

C2a-78

8.Agriculture– The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. Avocado, citrus, cactus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to sensitive individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the Project at the planned site would greatly damage many currently productive and successful agricultural businesses.

C2a-79

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

C2a-80

In addition, after criticizing four previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or a concept rather than a specific plan that defines their intentions.

C2a-81



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C2a-78	C2a-78	See Global Response: Project Consistency with General Plan Policy LU-1.2.
C2a-79	C2a-79	See response to comment C1t-11.
C2a-80	C2a-80	See response to comment C1t-12.
C2a-81	C2a-81	See response to comment C1t-12. The Specific Plan meets State requirements which include a text and "diagram" that specifies the distribution, location and extent of all land uses, public and private infrastructure and standards and criteria by which development will proceed.. The Specific Plan meets all these requirements. Flexibility is allowed to ensure that the Specific Plan will stand the test of time. Within the General Plan, Policy LU-1.8 allows flexibility in design when approved subject to a Major Use Permit or Specific Plan.

LETTER

RESPONSE

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

C2a-82

An indication of the severity of impact this Project has on the project site is provided by the shear volume of significant impacts, mitigable or not, listed in the table S-1 of the RDEIR Executive Summary, *SUMMARY OF SIGNIFICANT EFFECTS AND MITIGATION MEASURES TO REDUCE THE EFFECTS*. A project plagued by so many issues that will have such a drastic impact on the communities of Bonsall and Valley Center not to mention the region of north San Diego County, should not proceed any farther toward approval.

C2a-83

Submitted by:

Margarette Morgan, Chair
Bonsall Sponsor Group



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C2a-82

For detailed responses to these issues, please see responses to comments C1a through C1t which includes the multiple letters submitted by the Valley Center Community Planning Group.

C2a-83

The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Attachment to Letter C2a

BONSALL COMMUNITY SPONSOR GROUP

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August 17, 2013

TO: Mark Slovick, Planning Manager, Lilac Hills Ranch Project
Department of Planning & Development Services County of San Diego
FROM: The Bonsall Sponsor Group

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

Executive Summary: Lilac Hills Ranch DEIR Responses

The Bonsall Community Sponsor Group has been grappling with this project over many months. In our minds it is a bad ill conceived community busting project that should never have been brought forth to be examined in the light of day. Both the Bonsall and Valley Center planning groups have invested too many hours in trying to analyze a project that has so many flaws that more questions have been created than can possibly ever be plausibly answered.

The applicant has a penchant for putting off the preparation of necessary plans until sometime after the Project is approved and out of the reach of the public and the entitlements are awarded. This is like buying a pig in a poke.

The arcane formula that establishes how each jurisdiction determines how sacrificed wetlands will be mitigated and to what extent, apparently results in a straw drawing contest, and the agency that presents the longest straw sets the required acreage for mitigation, they are not additive.

Planning groups have more things to do than analyzing what can be considered a make work project, instigated by a rouge developer, of this nature. We are surprised that a developer would propose such an ill conceived improperly designed project for any kind of serious consideration. In our minds the associated developer of this project proposal has lost all creditability to the point that future projects proposed by this firm should be rejected out of hand and placed in the round file before any serious money or time is spent to analyze and process them.

The Valley Center Planning Group and the Bonsall Sponsor Group has spent many hours analyzing this project. We, therefore, without hesitation endorse all findings by the Valley Center Planning Group and their extensive analysis and conclusions concerning the project. Valley Center has done a monumental job they should be congratulated on many levels for their sense of community duty in doing what is a most unrewarding job.

Several things should be reiterated and reemphasized that Valley Center has so ably discussed:

Specifically how this project will negatively impact Bonsall, and how justification for the project is found particularly weak by the Bonsall Community Sponsor Group will be discussed in the remainder of the summary comments.

You will find that some of the text to be similar to Valley Center's submission however, Bonsall has many more questions and they are highlighted in bold and italics for easy reading in the 56 page document.

We agree with Valley Center in the following statements:

C2a-84

C2a-85

C2a-84 and C2a-85

Introductory comments noted. Detailed responses to comments which follow generally identify responses in other submitted letters.



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A. Introduction

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

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

Project Objectives – The following excerpt from the DEIR summarizes the Project Objectives:

PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

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

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

C2a-86

C2a-86 See response to comment C1c-1

C2a-87

C2a-87 See response to comments C1c-1, and C2a-30 through C2a-38, above.



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- 6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.
- 7. Provide the opportunity for residents to increase the recycling of waste.
- 8. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

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

Objective One

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

Objective Two

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

Objective Three

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

Objective Four

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

Objective Five

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

Objective Six

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

Objective Seven

Any Project Alternative would comply with this Objective equally.

Objective Eight

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

2. Project Inconsistencies with Regional and General Plans

In comments submitted over the last year, the Bonsall Sponsor Group and the Bonsall Design Review Board one and the same in our case have challenged the proponent's assertions that this SP/GPA is consistent with the adopted County General Plan [GP], or with Bonsall's [CP], or with the Bonsall Design Guidelines.



C2a-87 cont.

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Our previous comments, which have previously been accepted but if requested will be sent again via email, 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 is required of all County General Plans by California State Law. Therefore, in considering a Specific Plan, particularly one that requires amendments to an adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designations and road classifications, principles, elements, goals and policies.

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 the San Diego County General Plan and likely invalidates the San Diego County General Plan. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review.

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

C2a-87 cont.



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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.

Bonsall votes for the first REJECT THE PROJECT based on all of the inconsistencies.

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

C2a-87
cont.

1. Transportation/Traffic

The Bonsall Sponsor Group endorses the comments submitted by Darnell Associates regarding traffic impacts provided to us by the Valley Center Planning Group with our thanks.

C2a-88

2. Agricultural Resources

The Bonsall Sponsor Group endorses the comments submitted by the Cleveland National Forest Foundation regarding agricultural impacts.

C2a-89

3. Biological Resources

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

The DEIR indicates that these significant losses can be mitigated off-site through the purchase of land within the draft PAMA based on a formula developed by the County. However, the DEIR does not account for the loss of 608-acres of raptor foraging area, which includes both natural vegetation formations and agricultural lands. The proposal is to set aside 81-acres off-site for raptor foraging calculated using the losses of sensitive native vegetation. It does not include in that calculation the lost agricultural land foraging area.

C2a-90

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

C2a-88 See response to comments in comment letter I511.

C2a-89 See response to comments in comment letters O9 and O10.

C2a-90 See response to comments in comment letter C1m.



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

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

4. Cultural Resources

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

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

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

5. Hazards, Hazardous Materials, Wildfires

The development of the densely packed Project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion in this subchapter of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used. Please note that the Bonsall Community Plan has policies regarding buffering and chapter and verse on the protection of the agricultural areas of our community.

C2a-90

C2a-91

C2a-92

C2a-91 See response to comments in comment letter C1n.

C2a-92 and C2a-93 See response to comments C2a-47 through C2a-57, above.



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The issues of emergency response and evacuation plans are troublesome for this Project. The Evacuation Plan does not address the most fundamental evacuation issue of the proposed Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed Project. The mobility element roads nearest the Project are West Lilac and Circle R Roads. Both roads were built as 2.2 E two-lane roads to serve a rural community with small, rural populations and the applicant plans no upgrades to these roads. The addition of 5000+ people at the Project site will severely impact both emergency response and evacuation during a crisis event, exacerbating already congested conditions in such circumstances and putting many people at risk.

The applicant would further impact evacuation plans by proposing 10 road standard modifications that would lower the classification of the mobility element roads in some cases and lower the design speeds of those roads. With lower design speeds and narrower roadways, the Project will imperil evacuations from Bonsall and Valley Center to the I-15 corridor by existing residents, and impede the prospective residents of the Project at the same time. This kind of impact, played out in scenarios like Bonsall and Valley Center experienced in 2003 and 2007, would severely and significantly put hundreds of people at risk. Further, the Project has but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. There are no plans to upgrade this road. If an evacuation event is caused by a large wildfire from the west, the ensuing smoke plume will result in a panic evacuation over a single treacherous road.

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

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

C2a-92 cont.



<http://www.sdcounty.ca.gov/pds/Groups/Bonsall.html>



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Fire Protection Plan (FPP)

The proposed Project FPP does not meet the following basic requirements identified below by Issue Number:

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

C2a-92 cont.

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

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

C2a-93

Significant Irreversible Environmental Changes Resultant from Project Implementation

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

C2a-94

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



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C2a-94 See response to comments C2a-58 and C2a-59, above.

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

C2a-94

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

Greenhouse Gases

The Bonsall Sponsor Group endorses the comments submitted by the Cleveland National Forest Foundation regarding Greenhouse Gas impacts.

C2a-95

C2a-95 See responses to comments in comments letters O9 and O10.

Water Quality/Hydrology

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

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

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

C2a-96

C2a-96 See responses to comments in comment letter C1m.

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

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



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

C2a-96

It is tortured logic to argue that taking green field agricultural and semi rural estate land and introducing a dense urban environment that develops 504 of the 608 acres, adding 83 acres of road and 68 acres of manufactured slopes is consistent with policy COS-5.2 which requires development to minimize the use of impervious surfaces.

Geology and Supplemental Geology Report

The review identifies questions regarding the need for blasting that cannot be quantified to determine the amount and length of time needed to do removals and ultimately placement of fills. Silicates will be a potential hazard relative to the AQMD standards.

C2a-97

Slope Stability and Remediation describe cut slopes 6.2.1 and fill (manufactured) slopes 6.2.2 in excess of seventy-feet (70-feet) in height. There are no seventy-foot high manufactured slopes existing in this community, which makes these proposed slopes out of character with the community.

Project Alternatives

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

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

C2a-98

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

1. The DEIR Objectives against which the Alternatives are judged for Environmental Impacts are biased and should be changed to equitable objectives, from which compliance against can be fairly measured.
2. The Project does not meet its own Objectives, when fairly assessed.

C2a-97 See responses to comment C2a-60, above.

C2a-98 through C2a-99
See responses to comments C2a-62 through C2a-83, above.



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

Table 1 -Scant Attributes of 3 Alternates Provided

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

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

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

C2a-98 cont.

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



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TABLE 2 - COMPARISON TO PROJECT OBJECTIVES

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

C2a-98 cont.

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

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



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

- I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center’s central valley.
- II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife among other functions.

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

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

Specific Plan

The comments on the Specific Plan include several major concerns:

- 1. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.
- 2. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure.
- 2. Compliance with the General Plan. The Project’s Specific Plan threatens to overturn virtually every element in the County’s new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, nearly \$20 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, and “COMMUNITY BUSTING” particularly in the western portion of Valley Center and the eastern portion of Bonsall. If the Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.

C2a-98 cont.

C2a-99



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

5. LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “expected to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.

The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Bonsall and Valley Center communities, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Bonsall and Valley Center community and the zoning and land use patterns within Bonsall and Valley Center are consistent with that model.

6. Agriculture– The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. Avocado, citrus, cactus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building The Project at the planned site would greatly damage many currently productive and successful agricultural operations.

C2a-99 cont.



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

In addition, after criticizing three previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or an idea rather than a plan that defines their intentions.

C2a-99 cont.

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

Submitted by:

Margarette Morgan, Chair
Bonsall Sponsor Group



<http://www.sdcounty.ca.gov/pds/Groups/Bonsall.html>

