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**G. Conservation and Open Space (COS)**

**3.1 RESOURCE CONSERVATION AND MANAGEMENT**

**Goal COS-1.1** The preservation of the unique natural and cultural resources of Bonsall and the San Luis Rey River and associated watershed, with continued support for its traditional rural and agricultural life-style.

**Policy COS-1.1.1** Encourage the preservation of all areas of critical habitat identified under the Multiple Species Conservation Program in their natural state, allowing for maintenance and/or management for fire safety.

**Policy COS-1.1.2** Promote a coordinated approach to work with landowners to meet the community's needs in preserving habitat and conserving biological resources.

**Policy COS-1.1.3** Encourage the conservation of water for residential use through the implementation of water saving techniques, such as xeriscaping and dual piping.

**Policy COS-1.1.4** Require development to be compatible with adjacent natural preserves, sensitive habitat areas, agricultural lands, and recreation areas, or provide transition or buffer areas.

**Policy COS-1.1.5** Require that landscaping be designed to prevent erosion on graded sites and, if adjacent to sensitive habitats, require re-vegetation with the appropriate drought tolerant plant species with specific restrictions on the use of any invasive species.

**Policy COS-1.1.6** Encourage development to plant an appropriate variety of trees to stabilize soil conditions and contribute to atmospheric oxygen

**H. COMMUNITY OPEN SPACE PLAN**

**Goal COS-3.1** Natural resources, including existing trees, viewsheds, rock outcroppings, foothills, and meadows, and the San Luis Rey River Valley that are protected and contribute to the character and beauty of the Bonsall community.

**Policy COS-3.1.1** Encourage agricultural and equestrian open spaces and only encourage linking of open space if it is biological and supports a wildlife corridor system.

**Policy COS-3.1.2** Encourage incorporation of publicly-owned land into a functional recreation/open space system, wherever feasible.

**Policy COS-3.1.3** Require channelization that uses natural materials for bank protection to protect existing structures, whenever feasible. An exception may be at road crossings, and even then, natural materials shall be given preference to minimize the visual impact.

**Policy COS-3.1.4** Support low intensity land use zoning in undeveloped mapped floodplains, such as agricultural and low density residential zoning, to protect downstream areas from flooding hazards to minimize impacts on wildlife habitat and to provide scenic open space.

**QUESTION: These policies and goals have not been considered with the advent of this project especially Policy COS 3.2.4 WHY?**

C2b-68



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C2b-68 The project is consistent with the policies associated with the Resources and Conservation Management Goal of the Bonsall Community Plan.

- Policy COS 1.1.1: The project is not within the MSCP but the 104.1 acre Biological Open Space is adjacent to the planned North County PAMA. The open space will be managed to protect habitat value and functions including fire safety. Therefore the project is consistent with this policy.
- Policy COS 1.1.2: The project includes a 104.1 acre Biological Open Space. The open space will be managed to protect habitat value and functions and will also include multi-use trails accessible by the community. Therefore the project is consistent with this policy.
- Policy COS 1.1.3: The project Water Conservation Plan includes built in dual piping throughout the community and the project Landscape Plan includes drought tolerant, native species for all the common areas. Therefore the project is consistent with this policy.
- Policy 1.1.4: The project includes a 104.1 acre Biological Open Space, 20.8 acres available for community gardens and orchards, and includes a 50-foot buffer which will include two rows of trees. Therefore the project is consistent with this policy.
- Policy COS 1.1.5: The project Landscape Plan is designed to prevent erosion on graded sites, and includes many species of plants and trees. Areas near the Biological Open Space will be planted with native and drought tolerant plants and trees, and will exclude all invasive species. Therefore the project is consistent with this policy.
- Policy COS 1.1.6: The project Landscape Plan tree list includes many varieties of trees. Therefore the project is consistent with this policy.

LETTER

RESPONSE

	<p>C2b-68 (cont.)</p> <p>The project is consistent with the Community and Open Space Plan.</p> <ul style="list-style-type: none"><li>• Policy COS 3.1.1: The project will protect 104.1 acres of biological open space, which flows into Moosa Canyon, a valuable part of the planned North County MSCP. An additional 20.8 acres would be available for agriculture, outside of the biological open space. The project trail network will provide three links to the regional trail system and will include equestrian trails. Therefore the project is consistent with this policy.</li><li>• Policy COS 3.1.2: The project includes one 13.5 acre, centrally located community park within the Valley Center Community Plan area. The park site will be dedicated to the County and so will be required to follow County park planning procedures and guidelines. Therefore the project is consistent with this policy.</li><li>• Policy COS 3.1.3: The project Drainage Plan relies on natural drainages; however improvements will be required in select areas to protect roads and development. The project Landscape Plan includes a variety of plants and trees for common areas and will minimize the visual impact of the development. Therefore the project is consistent with this policy.</li><li>• Policy COS 3.1.4: The project, located near Keyes Creek, is not within a mapped inundation zone or within any mapped flood hazard area. Project development is located outside wetland drainages except for road crossings. Therefore the project is consistent with this policy.</li></ul>
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**Lilac Hills Ranch Consistency Analysis  
Bonsall Community Plan**

**General Comments:**

Rather than proposing a project that is consistent with the County's General Plan (GP), the applicant has simply proposed a general plan and a community plans that are consistent with the project. The purpose of a publicly vetted County GP is to build consensus in a public forum, even if it takes a decade or more. It provides direction and certainty for landowner, developers, public service providers and the County. The introduction of a new, unplanned population in the middle of an area planned for agriculture is not consistent with regional sustainable development (e.g. infill development) nor the Live Well, San Diego health goals (e.g. cleaner air).

C2b-69

C2b-69 and C2b-70

Comments noted. Comments consist of the opinion of the commenter and do not raise CEQA issues. Comments will be provided for consideration to the decision makers.

Furthermore, approval of this project will set a precedent that will serve as a model for future developments that also wish to ignore the County's GP. Every community planning area in the unincorporated county should be acutely concerned about the impacts on their residents from future unplanned projects that may follow suit.

The applicant is using the proposed GPA as a mitigation measure to reduce major impacts to a less than significant level. The project's consistency review uses the applicant's version of the general plan and community plans to determine consistency. This is misleading and not in the spirit of full disclosure. The consistency review for each goal and policy in the Consistency Analysis Matrix (CAM) should indicate whether the project is consistent with the existing, adopted plan. The analysis should then disclose consistency under the applicant's GPA, if it is adopted.

C2b-70

The Community Development Model is described as a Village surrounded by areas of lesser intensity. Outside of the Village, Semi-Rural areas would contain low-density residential neighborhoods, small-scale agricultural operations, and rural commercial businesses.

Leapfrog development is defined as village densities located away from established villages or established water and sewer boundaries.

C2b-71

C2b-71

The project meets all the locational requirements of Policy LU-1.2. Please refer to response to comment C2b-10 for further discussion of this topic. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

**QUESTION: The GP prohibits leapfrog development that is inconsistent with the Community Development Model. But, in practice (this project for example), isn't the Community Development Model simply village densities located away from other established villages and separated by semi-rural and/or rural lands?**



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RESPONSE

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Thus, any project that proposes village densities in a semi-rural area (leapfrog development) would meet the criteria of the Community Development Model (a Village surrounded by areas of less intensity).

**QUESTION: Therefore, the prohibition against leapfrog development is meaningless unless the County can explain away the GP and the Community Plans is that what is being done with this project?**

One might argue that a Village is more than village densities, that the Village would contain a broad range of pedestrian scale commercial and civic uses that are connected to residential neighborhoods through a network of local roads, bicycle lanes and walkways, but if the Village or some portion (town center?) is proposed as Mixed Use with the potential to be developed as residential or commercial, the problem is solved.

The applicant has used this loop hole to claim the project as an exception to leapfrog development. If the project only consisted of residences at village densities, it might be viewed as less than a Village. True, the first phase to be built will consist only of homes. The part of the project that distinguishes it as an actual village with a town center (the part that allows this whole project to qualify as an exception to leapfrog development) may or may not be built, depending on the market. If the "town center" never comes to pass, Bonsall and Valley Center has inherited another dense residential subdivision in the middle of the rural lands the community wanted to preserve. Because the town center is the reason that this project is being considered, there needs to be a mechanism in place to assure that the town center phase is built and that it is built within a few years of the first phase, thereby providing the civic and commercial services to the residents that makes this development a village.

**QUESTION: Will the County do this if the project is approved?** For example, the Specific Plan would not vest until building permits were pulled for the town center or the County could enter into a development agreement that would specify this requirement.

The GP update identified Villages by existing land use patterns. Typically the Village was identified as the heart of the community planning area where established commercial and/or civic uses had evolved and residential density were higher than surrounding lands. The Village was delineated as a compact development where uses, rather than ownership, determined the regional category. Often parcels that were not developed were included in the Village by virtue of their adjacency and similarity in features to other parcels in the Village. This also gave the Village the growth potential to support future development.

The unusual shape of the Village proposed for this project and the fact that phases 4 and 5 are only contiguous to the rest of the Village by a single corner suggest that neighboring parcels, especially those to the west of phases 4 and 5, may have a good argument for a change to their regional category as well. There are no major physical differences or even logical divisions such as waterways or roads, only ownership boundaries.

C2b-72

C2b-73

C2b-74



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C2b-72 The project is wholly consistent with the General Plan and Policy LU-1.2 Please refer to responses to comments C2b-1 and C2b-17 for further discussion of these topics. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-73 The project is designed so that each phase of construction would trigger specific mitigation measures that are tied to the physical impacts that would result from that phase of development; As detailed in the Specific Plan, Part IV Implementation, the project phasing provides for flexibility to allow for market variability. The Specific Plan, Section IV Implementation includes a Community Phasing Plan on page IV-1. Construction of the project is anticipated to occur over an eight to twelve year period in response to market demands and to provide a logical and orderly expansion of roadways, public utilities, and infrastructure. The five phases of the project are shown in Figure 15a of the Specific Plan and phasing would be implemented through the recording of the Final Maps. Actual construction of dwelling units could occur in any order. For example, Phase 3 may be constructed after Phase 1, followed by Phase 2, etc. The project's phasing plan is discussed in FEIR subchapter 1.2.1.10.

The applicant would be required to meet various commitments prior to approval of each Tentative Map or Tentative Parcel Map such as providing landscaping, street improvements, parks, open space dedications, and satisfying the mitigation measures included in the FEIR. As a result, regardless of the order of phasing, the environmental impacts would be fully mitigated prior to the impact occurring and be consistent with the requirements set forth in the Specific Plan.

C2b-74 The project is consistent with the LU-1.2 and its Community Development Model component, as discussed in the response to comment C2b-17. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

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Finally, no other Village in the unincorporated County is split between two community planning areas. For issues not addressed in the Specific Plan, one portion of the Village will be subject to the Bonsall Community Plan and the Sponsor Group while the rest is subject to the Valley Center Community Plan and Planning Group. This split could result in some difficult and unintended consequences.

**QUESTION: How will this be resolved?**

**Bonsall Community Plan**  
**Commercial, Industrial and Accessory Uses**

**Goal LU-4.1** Residential, commercial and other development that is compatible with the rural environment and enhances the community's quality of life. All commercial uses have aesthetically pleasing and functionally adequate operations with appropriate onsite parking, internal circulation, setbacks and landscaping and do not cause any adverse impacts on neighborhood properties such as visual unsightliness, excessive noise, unpleasant odors, air pollution, health hazards, etc.

**Policy LU-4.1.1** Require the design of commercial development to enhance the character of a rural village and not take on an urban type design.

**Policy LU-4.1.2** Require commercial development to be compatible with the rural environment and enhance the community's quality of life. Require all commercial uses to have aesthetically pleasing and functionally adequate operations with appropriate onsite parking, internal circulation, setbacks, and landscaping, and not cause any adverse impacts on neighborhood properties.

**Policy LU-4.1.3** Prohibit commercial development in Bonsall that principally serves regional needs, rather than the needs of the local community.

**Policy LU-4.1.5** All accessory uses should have minimal impacts, and be compatible with the surrounding neighborhood and the rural community character. Accessory uses subject to a discretionary permit should be compatible with the neighborhood, including factors such as health, safety, nuisance and noise.

**Policy LU-4.1.6** Prohibit those commercial activities, which generate visual unsightliness, excessive noise, unpleasant odors, air pollution, health hazards, and do not comply with internal or screened onsite parking.

**Policy LU-4.1.7** Discourage incompatible land uses on areas of agricultural use and land suitable for agricultural usage.

**Policy LU-4.1.8** Restrict uses such as sand mining in the Semi Rural designated areas so that adverse impacts to conservation, circulation, safety, and community character (including tranquility, quiet, and low congestion) do not occur, unless mitigated or overriding findings are made pursuant to the California Environmental Quality Act (CEQA).

**Policy LU-4.1.9** Require Commercial development to provide buffers between adjacent residential areas; this can be accomplished through increased setbacks or other techniques such as grade differentials, walls, and/or landscaping.

C2b-75

C2b-76



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C2b-75 The project needs only be consistent with both community plans to facilitate orderly development. The project is consistent with both community plans, as discussed in response to comment C2b-1. See also, FEIR Appendix W.

C2b-76 The project is consistent with the policies associated with the Commercial, Industrial and Accessory Use Goal of the Bonsall Community Plan.

- Policy LU-4.1.1: Project architectural guidelines contain rural-themed concepts. The Specific Plan includes illustrations to show the rural village theme expressed in all land use contexts, including commercial. The Specific Plan contains no urban concept themed concept. Therefore the project is consistent with this policy.
- Policy LU-4.1.2: Project architectural guidelines contain rural-themed concepts. The Specific Plan includes illustrations to show the rural village theme expressed in all land use contexts, including commercial. The Specific Plan includes plans for onsite parking, internal circulation, setbacks, and landscaping that ensure they will be both aesthetically pleasing and functional. Parking lots will include interior trees. Roads will be narrowed, curved and landscaped. Commercial areas will be reminiscent of historic California villages of the 1920s and 1930s. Therefore the project is consistent with this policy.
- Policy LU-4.1.3: The project commercial areas will include special retail, farmer's markets, and a rural scaled general store. The project will not include regional scale, big box commercial. Therefore the project is consistent with this policy.
- Policy LU-4.1.6: Project aesthetics will be unified and ensured by the design guidelines in the Specific Plan for all land uses, including commercial and commercial parking areas. The project is pedestrian-oriented and will discourage the use automobiles and parking lots for accessing commercial goods and services. All commercial activities must comply with local, state, and federal laws controlling air pollution and health hazards. Therefore the project is consistent with this policy.

LETTER

RESPONSE

	<ul style="list-style-type: none"><li>• Policy LU-4.1.7: The project includes 20.8 acres on-site that would be available for community gardens and orchards, and permanently protects 48.3 acres of agriculture off-site. Trails will be lined with 50-foot buffers planted with trees. Commercial areas will accommodate farmer's markets, and agricultural boutiques for value added products and small wineries. Existing agricultural areas in open space will be permitted to continue with agricultural uses consistent with approved resource management plans. Adjacent agriculture will be protected by residential CC&amp;Rs that discourage complaints. Therefore the project is consistent with this policy.</li><li>• Policy LU-4.1.8: Not applicable. The project does not propose sand mining operation.</li><li>• Policy LU-4.1.9: Between the landscape plan, the parks, the trails, and the juxtaposition of the biological open space and agricultural buffers, the project layout ensures adequate buffering between residential and non-residential uses. See EIR, Figure 1-4a. Therefore the project is consistent with this policy. Therefore the project is consistent with this policy.</li></ul>
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As neither the SP nor the DEIR is clear as to which design standards apply. The SP purports to override all county documents and states it prevails over any inconsistent provisions in the GP, Bonsall and VCCP, ordinances or design guidelines. In other places, it states some aspect of the project is consistent with the Design Guidelines, implying that they would, nevertheless, be applicable. The many pictures, instead of clear text, clearly show urbanized design, out of scale and character for a rural community. The massive grading replaces natural hills with manufactured slopes to accommodate urban design, ignoring natural topography for both roads and residences. The request for deviations from road standards is also in direct conflict with these provisions in the Community Plan. The CAM does not include Policies 5 (as stated in the Project Issue Checklist) or Policy 6 for consistency analysis. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

**QUESTION: The Bonsall Sponsor Group requests the County answer this question and define which standards apply.**

**Biological – The Bonsall Sponsor Group agrees with the Valley Center Planning Group comments and instead of copying it in our submission we refer to it with our agreement and support of all comments included.**

**Plan Amendments**

This section of the RDEIR is a tricky one. This is the section in which the County identifies the very substantial amendments to existing planning documents that must be made in order for the Lilac Hills Ranch project [the Project] to be approved and considered as consistent with those same documents. I said it was tricky.

It's analogous to changing the rules in soccer so that the opposing team must play without a goalie in order for your team to win. We in Bonsall are hoping that the County government that represents us will defend from assault the governing documents that are in place to act as the standard for land use and development.

The first item to be changed is the Regional Land Use Element Map. This change will convert semi-rural SR-4 [one dwelling unit per 4, 8, or 16 gross acres – slope dependent] and semi-rural SR-10 [one dwelling unit per 10 or 20 gross acres – slope dependent] parcels into village residential VR 2.9 [up to 17 dwelling units per acre] and village core C-5 land uses with commercial and urban densities. These kinds of land uses aren't permitted now in the Lilac Triangle where the Project is proposed according to the current Regional Land Use Element Map.

**QUESTION: Will the General Plan and the Map be amended to permit the changed land uses for this project if approved and all other projects throughout the county as the GP and all that is part of it is destroyed?**



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C2b-77

C2b-78

C2b-79

C2b-80

C2b-77 The Specific Plan works in conjunction with the General Plan and associated community plans. Once adopted, the Specific Plan would serve as the document which provides development standards, similar to zoning standards, which would govern the design of the project. Specific plans are used to apply development standards to a specific project. Any possible gaps or lack of specificity in development and design standards in the General Plan or Community Plan texts will be addressed, in a manner that does not conflict with other Plans, through the project-specific refinements to standards that are contained in the Specific Plan.

The project is consistent with community character. The Specific Plan includes site level details regarding design and operations that will govern the plan as it is implemented during successive the site level approvals to achieve the goals of that plan. For example, the project Specific Plan has specific landscape (e.g., plant palettes) and architectural design standard (e.g., California bungalow, historic 1930s village). The site plan approval process (implementing the Specific Plan) would incorporate the Valley Center Design Guidelines, as applicable, following the special process set forth for applying the "V" setback regulator and the "D" Special Area Designator requirements as described, in Ch. IV of the Specific Plan in p. IV-7. Please refer to the Global Response: General Plan Consistency Analysis for more thorough discussion of project and community plan consistency with the General Plan. The Specific Plan would not replace the Valley Center Design Guidelines with the design guidelines of the Specific Plan and would in fact be required to meet the design standards of the Valley Center Design Guidelines. In such cases, the Site Plan would also be subject to the Valley Center Design Review Guidelines. (FEIR Appendix W, discussion of consistency with the Valley Center Community Plan design issues related to Residential Goals and Commercial Goals).

With regard to the comment that the requested exceptions to road standards would conflict with the Community Plan, please refer to the Consistency Analysis Matrix about the private roads within the project community and how they may be modified in accordance with the County's policy for Roadway Exceptions. Approval of any such street exceptions for the project would still be consistent with Policy 2 of the Valley Center Community Plan's Mobility Goal relating to rural character. Chapter III.B.2.a of the Specific Plan establishes

LETTER

RESPONSE

	<p>C2b-77 (cont.)</p> <p>special standards for development of the project's private roads to ensure they "reflect the traditional character and rural theme of the Community." Further, a number of Specific Plan Policies require roadways in the project to be designed in a manner that would minimize impacts to significant biological, environmental, and visual resources. Policy 8 of the Specific Plan limits disturbance and development to only those areas shown in the Specific Plan. Policy 9 of the Specific Plan requires a safe and efficient circulation system that supports the project, links to regional transportation elements when appropriate, and minimizes impacts to residential neighborhoods and environmentally sensitive areas. The Specific Plan also sets forth project road design standards, as well as the site plan processes, to ensure consistent application to the project. All internal roads are designed to reinforce the rural atmosphere of the community by reducing design speed and retaining two lanes.</p> <p>While not addressed in the Consistency Analysis Matrix, the project is consistent with this Rural Compatibility Policy 5 since it will adhere to the Valley Center Community Right of Way Development Procedures, as applicable, as indicated in the Specific Plan on page II-26. Regarding Rural Compatibility Policy 4, grading guidelines ensure natural topography on the site is adhered to, wherever possible, by applying refined grading techniques, including curvilinear and undulating shapes. The proposed roads would follow the natural topography and minimize grading for roads to the minimum necessary without compromising safety. Where required, the installation of curbs, gutters, and sidewalks will be according to County and State standards however, the Specific Plan illustrates on Figures 25 through 53 the typical street cross sections, with parallel community pathways featuring trees, shrubs, rustic fencing, permeable surfacing, such as decomposed granite, which promote a rural, rustic atmosphere. The Specific Plan includes a thorough discussion of Road Landscaping design standards and regulations in Subchapter III.D.3 starting on page III-18. Thus, the project is consistent with Rural Compatibility Policy 5.</p> <p>While not addressed in the Consistency Analysis Matrix, the project is consistent with Rural Compatibility Policy 6 since the project is consistent with the Community Development Model which includes feathering at the project boundaries to create a seamless transition to the surrounding Semi-Rural land use.</p>
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LETTER

RESPONSE

	<p>C2b-77 (cont.) Furthermore, there are no uses as the project periphery which would create heavy traffic, noise, odors, dust, or unsightly views. The project periphery to the east would be fully landscaped with trails, and 50 foot wide orchard buffers; project features to the west would consist of biological open space and parks. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on the application of “feathering” techniques, such as positioning open space and trails at the project perimeter, under the Community Development planning model. Please also refer to Global Response: General Plan Consistency Analysis for a thorough discussion of this topic.</p> <p>C2b-78    The project conserves biological resources. Please refer to response to comment C2b-55 for further discussion of this topic.</p> <p>C2b-79 and C2b-80 General Plan Policy allows the designation of new villages that are consistent with the criteria of Policy LU-1.2. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.</p>
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Further, this change of land uses flies in the face of the Community Development Model as it is applied in Valley Center and Bonsall. In those two communities, the high-density village cores feather out to semi-rural and rural land uses at the margins of both planning areas according to the Community Development Model. Strangely, that is precisely where the applicant is determined to build another village center in complete contradiction to the Model. The logic of such a move is so perverse that it defies explanation. To pursue a high-density urban community precisely where the Community Development Model places very low density rural land uses is astonishingly audacious. One explanation for the move is that the applicant has intended to remove the General Plan goalie by changing the Regional Land Use Element Map to allow an urban development on green field, agricultural lands expected to buffer the village centers of Valley Center and Bonsall.

**QUESTION: What is the County's purpose in allowing such a misplaced Project to advance through the approval process when it is predicated on destroying the GP and the Community Plans?**

The second change to be made is to the Bonsall Sponsor Group Map [a component of the General Plan]. The land uses must be changed from rural uses to urban uses and to allow a third village within the planning area for this Project to advance. There is no other way for the Project to be consistent with the Bonsall Map except to modify it to conform to the Project.

**QUESTION: This is not planning. We in Bonsall have the understanding that projects should conform to the General Plan and the community plan, not the other way around. Is this not the County's understanding? And, if not, why not?**

The third change is similar to the second except the bald faced affront is to the Bonsall Community Plan Map. Again, it is the plan conforming to the Project rather than the other way around. And this Project is replete with significant impacts that must be explained away in order to move forward.

The next change is to the General Plan Mobility Element road classification of West Lilac Road from 2.2C to 2.2F along the Project's northern border. The current plan for that section of West Lilac Road is a 2.2C road. A 2.2C road is a two-lane road with intermittent turn lanes, 8-foot shoulders, bike lanes and a pedestrian path. The request to down grade the road classification to 2.2F would make it a two-lane road with virtually no shoulders, bike lanes or turn lanes. The 2.2F would be less costly to build because it would require fewer features and the taking of less private land by eminent domain.

However, since the County depends on developers to build new roads and improve existing ones as a condition of development, why would the County consider a downgrading of the standards for this section of West Lilac Road?

Not only will the size of the road be reduced, but, so will its design speed, from 40 mph to 25 mph.

**QUESTION: Why would the County consider reducing the design speed of West Lilac Road so drastically given its significance as a Mobility Element Road and its importance as a community evacuation route?**

C2b-81

C2b-82

C2b-83

C2b-84

C2b-81 General Plan Policy allows the designation of new villages that are consistent with the criteria of Policy LU-1.2. Please refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-82 General Plan Policy allows the designation of new villages that are consistent with Policy LU-1.2. Please refer to comment C2b-31 for further discussion of this topic. Please also refer to the Global Response: Project Consistency with General Plan Policy LU-1.2.

C2b-83 It is not clear what the comment means; however, with respect to the last sentence of the comment, the following response is provided: The FEIR analyzes and discusses the potential environmental impacts of the project. CEQA requires an EIR to provide a reasonable, good faith disclosure based on a practical analysis of environmental impacts even though others may disagree with the underlying analysis or conclusions. An EIR should provide sufficient information to enable decision makers and the public to understand the environmental consequences of a project. Reviewing courts will resolve any disputes regarding the adequacy of an EIR analysis in favor of the lead agency if there is substantial evidence in the record supporting the EIR's approach. (*Laurel Heights Improvement Assn v. Regents of California* (1988) 47 Cal.3d 376) CEQA Guidelines 15384 defines substantial evidence to mean enough relevant factual information from which reasonable inferences can be drawn. The project FEIR analysis is based the project environmental document and the 35 technical appendices attached thereto.

C2b-84 The FEIR subchapter 2.3 analyzes roads, including the changed classification of West Lilac Road. The FEIR proposes changing a segment of West Lilac Road from a County Light Collector Road Standard 2.2C to a County Road Standard Light Collector 2.2F. Much of West Lilac Road in the vicinity of the project does not meet County road standards. The project would improve West Lilac Road from Old Highway 395 east to the western project boundary to Light Collector 2.2C standards. The south half of the road along the project boundary would be improved to 2.2F standards consistent with standard subdivision practice and a multi-purpose trail would be added. The 2.2F standards would allow a narrower half-width to be graded, which would generate less impacts upon adjacent residences. The analysis in the FEIR assumes the Modifications to West Lilac Road have been approved by the County and have been



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RESPONSE

	<p>C2b-84 (cont.)</p> <p>incorporated in the project description. The FEIR analyzes this segment of the roadway consistent with 2.2.F standards. This segment of West Lilac Road, from the western property boundary to Covey Lane would operate at LOS D or better at project build out. Per the FEIR Table 2.3-10, with the Mobility Element Amendment, all segments of West Lilac Road would operate at LOS A-D when the project is built out with the 2.2F classification.</p>
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**Growth Inducing Impacts**

Apparently, the folks who wrote this section of the RDEIR have not lived in southern California for long, are unaware of the history of development here and/or do not understand the need to consider growth inducement. The DEIR version from July 2013 made the statement that “While the project site and surrounding areas are not identified in the General Plan for growth, it is a location where such growth is likely to occur because the project area can accommodate the growth.” Such tortured, circular logic makes any reasonable explanation for the conclusion unattainable. But, it is emblematic of the kind of obtuse logic that is used throughout the RDEIR in 2014. Growth can occur anywhere we choose to place it. We, as a community, make such determinations about the location and types of growth based on land use planning, zoning and community consensus. That is how we arrived at the General Plan [it took 12 years and \$18.6 million to do it]. To ignore the General Plan simply because growth can occur at a given place begs the question why have a General Plan at all? The California legislature reasonably concluded that each county must have a general plan to guide growth, hopefully logically, but at least, in an ordered way. Prospective property owners are able to go to the General Plan to determine what kind of development is likely to occur around the property they wish to buy. That kind of research is useless if the General Plan can be drastically changed before the ink is dry on its first printing.

C2b-85

**1.8.1 Growth Inducing Impacts Due to General Plan Amendment (Increases in Density)**

The proposed addition of 1746 equivalent dwelling units [EDU] could take place virtually anywhere in the County using the fast and loose justification presented in this RDEIR. Of course, maybe that is the plan: approve a general plan, any general plan, and then simply change it when it is convenient to do so. It’s much less messy than debating the best course for the County’s land use plan, arriving at some consensus and then defending the plan in the face of development requests that have no intention of addressing, much less complying, with the General Plan.

C2b-86

**QUESTION: Why is the County failing to defend the goals and policies of the General Plan when confronted with projects such as this one? Where in the General Plan does it offer a pass for projects that, like this one, fail to comply with so many of the goals and policies of the plan?**

If this Project is approved, the County will be opening the surrounding 2-, 4-, 10+-acre parcels to more intense densities based on the justification that the project is at village densities, and the upzoning of surrounding property would be a consistent ‘feathering’ of the higher village densities of the project outwards. It sounds circular. And, it is. The County Community Development Model requires higher densities at an established village core with gradually decreasing densities as one moves to the periphery of the community. Of course, this project is not consistent with the Community Development Model itself. Dropping such a large, urban development into rural, agricultural land, which is itself the periphery of the Valley Center and Bonsall communities, defeats the concept of concentrating density at the established village core.

C2b-87

C2b-85 through C2b-89

The project will be growth inducing as discussed in the FEIR subchapter 1.8 and response to comment C2b-13. However, potential impacts are too speculative for evaluation in this FEIR because the specific nature design and timing of future project is unknown at this time.



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By this logic, a so-called 'Community Development Model' community could be plunked down anywhere there are a few acres of agricultural land between existing communities, regardless of the disruption it causes to established communities. "Communities," such as the one Accretive proposes to build, on valuable agricultural land where most of the infrastructure to sustain it will have to be built for the project, subverts the intent and purpose of the Model.

C2b-87  
cont.

The DEIR of July 2013 continues, "Approval of the Property Specific Requests [PSR] could result in an increase of approximately 1598 additional dwelling units throughout the regional area. Therefore, the Project's proposed density would not induce the growth in this portion of the county." First, basing a justification for not inducing growth on the prospect of an approval of the Property Specific Requests is fanciful. What if it is not approved? Will the project induce growth then? Second, there is no definition of what the "regional area" is, nor any analysis of how the possible addition of 1598 EDU could relieve the area surrounding this project from growth inducement. It seems more likely that the Property Specific Requests are seen as an excuse, "Well, they are adding EDU, so why can't we?" Are we to just take the County's word that adding 1598 EDU as a result of granting approval for the PSRs will not cause the Project to induce growth? Are not the Property Specific Requests merely an assault on the General Plan by the Board of Supervisors at the request of individual property owners trying to squeeze even more potential density out of properties designated for other uses by the consensus-built General Plan?

C2b-88

**QUESTION: Can you please try to answer the questions in a real clear manor?**

In the RDEIR, "... growth inducement could occur if the project and all associated infrastructure improvements directly or indirectly remove obstacles to growth, or otherwise increase the demand for additional growth in the area around the project." If the project is approved, it will have the effect of removing the planning 'barriers' established in the General Plan and Valley Center and Bonsall Community Plans that reserved the Project site for agricultural use at the periphery of those two village centers. Once village densities are inflicted on the Project site, the surrounding parcels would likely be eligible for higher densities as well, in order to match or gradually transition to less than the adjacent village density. Once eligible, an organization like Accretive would move to develop those parcels and perhaps sell the rights to build to the building industry. They would justify the development using the high densities in the Project's adjacent village. That is growth inducement 101. Neither the Project, nor the induced growth it will cause, are needed to augment the County's housing inventory. The General Plan already provides enough opportunity for development to address expected population increases, and it does it in a way that preserves productive agricultural land, fulfilling another of the General Plan's land use goals.

C2b-89



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The Project fails to meet the criteria of a village as defined in the General Plan. It is neither compact [generally 2-miles long by 1-mile wide with a perimeter that would make an amoeba proud] nor is it, "...where a higher intensity and a wide range of land uses are established, or have been planned." The General Plan and community plans recognize the Project site as low-density agricultural land that is between the two established communities of Valley Center and Bonsall, and designate it to remain that way.

C2b-90

**1.8.2 Growth Inducement Due to Construction of Additional Housing**

The notion that the 90,000 square feet of commercial space could cause the construction of additional housing adjacent to the Project, that would benefit the workers employed in that commercial space, is a fatuous one. First, given the likely high costs of constructing the Project and any off-site, but adjacent, housing, few if any of the retail employees being considered will be able to afford to live within the Project. More likely, those employees will come from far afield since the Project is so removed from other population centers where affordable housing is available. Of course, this will complicate an already dire traffic and Green House Gas situation. It is also likely that the prospective employees will not come from areas adjacent to the Project, since many of the neighboring property owners are retired or engaged in agriculture. And just as likely, the employees will not come from the ranks of the new residents of the Project, as they will probably not be willing to work at jobs paying near minimum wages that would not support a lifestyle within the Project or adjacent to it.

C2b-91

To speculate on where retail employees will originate is conjectural in the extreme and not worthy of inclusion in a discussion of growth inducement. Since the County conclusions for this section cite that speculation on 'potential' impacts do not comport with CEQA Guidelines for evaluation in this RDEIR, why are we talking about employee origins? How many employees could there be in 90,000 square feet of commercial space? How likely is it that employees will rush to build a house next to the Project so they can work at a minimum-wage job?

**Construction/Improvement of Roadways**

According to the RDEIR, "Construction of new roadways or improvement of existing ones could potentially induce growth if the roadway development provides significantly improved accessibility to undeveloped or underdeveloped areas within the community."

In the case of the internal road system, the Project's proposed roadway improvements will not be growth inducing. In fact, they will not even adequately support the Project's proposed 5,185 residents. None of the Project's internal road construction or existing road improvements is designed to do much more than save the applicant the cost of road development. With the exceptions of 'Main Street' and 'Lilac Hills Ranch Road,' which are the principal roads running the length and width of the Project, the remainder of the internal roads are "conceptual" and are represented on most of the Project Maps as suggestive arrows. In other instances, points of access and egress to/from the Project are more problematic given that they depend on uncertain easement rights and overburdening of private easements.

C2b92



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C2b-90 The comment states that the project is currently low density agricultural land between two established communities. However, the General Plan states that it is intended to be a dynamic document and any amendments will be reviewed to ensure that the change is in the public interest and would not be detrimental to public health, safety and welfare. (County of San Diego General Plan, adopted August 3, 2011, Page 1-15, which page is incorporated by this reference.) The project is seeking an amendment to the General Plan to add a new Village that meets the criteria of Policy LU-1.2. The project is a new Village whose structure, design and function are based on the Community Development Model. (FEIR, subchapter 3.1.4.2, Land Use Planning, p. 3-87-89; Technical Appendix W, Att. A, pp. 1-2; Specific Plan, Part II.G, pp. II-38-40); the Project is located within existing water and sewer boundaries (SDCWA boundaries) as contemplated by the General Plan (FEIR, subchapter 1.8.4., p. 1-47 and the Specific Plan, Part I.E.2; Water Resources, p. 1-7); and, the project is designed to be LEED-ND equivalent (Please refer to Topical Response with General Plan Policy LU-1.2 for a thorough discussion on this related topic.). The Project is anchored by a pedestrian-oriented, mixed-use Town Center that includes high-density residential, commercial and professional offices, various private and public facilities, a park and the community trails. Compact residential neighborhoods radiate out from the Town Center towards the Project perimeter and support several small parks and the community trails. Neighborhood centers include clusters of attached homes, commercial and professional uses, a 13-acre park and the community trails. The Project perimeter transitions to surrounding semi-rural areas by featuring: wider, ranchette-style lots, a 50-foot wide orchard-planted buffer, swaths of a 104 acre natural preserve, and the community trails. The road network is densest at the Town Center and there are over sixteen miles of landscaped, lighted, and signed multi-use community trails stitching every part of the community together and connecting to county regional trails. (See Specific Plan, Part V.B., pp. v-7 to v-9)

LETTER

RESPONSE

	<p>C2b-91 FEIR subchapter 1.8.2 explains that the limited type and amount of mixed-use and commercial land uses (commercial, office, retail and Country Inn uses as identified in FEIR subchapters 1.2 and 1.2.1.3) within the project are not likely to cause persons to relocate to the area around the project for employment reasons. Moreover, the comment makes the point that is stated in FEIR subchapter 1.8.2 – the project “would not necessitate the construction of additional housing for employees beyond what is proposed within the project, and growth inducement would not occur as a result of the need for increased housing.”</p> <p>Further, the project is consistent with the 2050 Regional Transportation Plan (RTP), and its Sustainable Communities Strategy (SCS), which seek to guide the San Diego region toward a more sustainable future by integrating land use, housing, and transportation planning to create communities that are more sustainable, walkable, transit-oriented, and compact. The project carries out the intent of the SCS by being consistent with the General Plan, including Policy LU-1.2, as described in Global Response: Project Consistency with General Plan Policy LU-1.2. Per a study by SANDAG, the average trip length for people in this project would be 7.6 miles. That is 8 percent less than the average trip length throughout the entire community planning area.</p>
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So, the claim that that the Project, "... includes an internal, private road system that would be sufficient to serve the project, and allow access to the Town Center by residents of neighboring communities," is being conjured from behind a thick cloud of smoke with the help of an array of mirrors. However, if the internal roads are approved and built in whatever configuration that the applicant will finally choose, they will provide the rudiments from which other connecting roads will emanate to join adjacent off-site parcels to the project, and thereby, induce growth. Can the County explain how the internal road 'system' would not serve the purpose of allowing off-site development to proceed if the Project is approved? Will the County's explanation include the prohibition of such expansion based on the principles of the General Plan?

C2b-92  
cont.

The RDEIR claims that, "The primary entry into the project and serving as the formal backbone throughout the development would be Main Street (Figure 1-7). Main Street would not serve as an alternative route to existing roads because traffic calming measures (i.e., couplets) would discourage through traffic." The Main Street through the Project is likely to be no more traffic calmed than West Lilac Road to which it connects at both ends and for which it would be an alternative route to the I-15 corridor. The Project proposes to reduce the design speed of the segment of West Lilac Road between the Main Street intersections, which may make Main Street the faster, more attractive alternative route. Will not enhancing access with the addition of Main Street likely incentivize growth for surrounding parcels?

C2b-93

Concerning off-site improvements to existing roads that would be designated to serve the Project and the surrounding community of Bonsall and Valley Center, the applicant has asked for 10 road standard modifications that will lower the capacity and/or the design speed of the existing public roads [with no consequent benefit to the public] or confiscate private roads through the County's use of eminent domain to benefit, not the public, but the needs of the applicant's Project.

C2b-94

Section 1.8.3 suggests that the applicant wants to improve private Mountain Ridge Road to County private road standards with a gated entry system to the Project to minimize through traffic, in one option. Such a move would overburden the private easement with excessive traffic from the Project, especially in evacuation circumstances. However, in other sections of this RDEIR, the applicant is optioning private Mountain Ridge Road as a fully public road that would have to be seized using the County's eminent domain authority in a way that harms existing easement owners for the benefit of the applicant's Project. Another optional proposal would put a fire station along Mountain Ridge Road after its conversion to a public road. So, through traffic would likely be dramatically increased along roadways not built to handle such excessive volumes.

C2b-95



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C2b-92 through C2b-94

The FEIR thoroughly analyzes project traffic including road improvements. See FEIR subchapter 2.3. The proposed circulation plan for the project is shown in the FEIR, Chapter 1 on Figure 1-7, which shows both on and off-site road improvements. Regional access to the project would be via West Lilac Road westward to the Walter F. Maxwell Memorial Bridge, and over I-15 thereby providing access to this freeway and SR-76. Improvements would be made to West Lilac Road and the off-site portion of Covey Lane (the on-site portion of this road would remain a private road). All other streets within the project site would be private and designed pursuant to Section III.B of the Specific Plan. Improvements to the public roads would be made in accordance with County Public Road Standards except for West Lilac Road in which six modifications (design exceptions) have been incorporated in the design of the roadway. Please refer to Response to Comment C2b-40.

In addition, the project is requesting a General Plan Amendment to change the Mobility Element road classification for West Lilac Road from the western project boundary east to Covey Lane from 2.2C to 2.2F. Additional road modifications have been included for Mountain Ridge Road and for two other on-site private roads internal to the project. The design modifications are described in Chapter 1 of the FEIR and in subchapter 2.3.2.3 of the FEIR. The modification requests have been made pursuant to the process set forth in the Public Road Standards and Private Road Standards. All the modifications have been incorporated in the design of the corresponding roadways and analyzed in subchapters 2.1-Visual, 2.5-Biology and 2.6-Cultural Resources of the FEIR.

C2b-95

The FEIR thoroughly analyzed pass-through traffic. In general, the project would acquire all necessary project easements either as proposed, or with the inclusion of alternative alignments, while continuing to meet all applicable design guidelines and standards in the Specific Plan; and in compliance with all local, state and federal laws and regulations. Please refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads) and the Off-Site Improvements - Environmental Analysis and Easement Summary Table attached to the Global Responses regarding easement information. Please also refer to response to comment C2b-40 for a thorough discussion of project traffic analysis.

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Similarly, along the northern boundary of the Project, West Lilac Road would be redesigned to a potentially 2.2F standard [two lanes with minimum shoulders] or 2.2C standard [two lanes with intermittent turn lanes and standard shoulders, bike lanes and paths] and have the design speed reduced from 40 miles per hour to 25 miles per hour. This kind of change will result in Main Street looking more attractive as an alternate route, as mentioned above, but will also reduce the traffic volume that this Mobility Element Road will be able to handle. Consequently, such a reduction will dramatically impact traffic to and from the Valley Center community along one of only two Mobility Element Roads in the area. Further, the redesign of this segment of West Lilac Road will involve the use of eminent domain, and likely will result in the loss of residence structures on the north side.

C2b-96

While the RDEIR concludes that the internal road plan and off-site road improvements would not remove a barrier to additional growth, common sense comes to the conclusion that building extensive internal roads and expanding existing public roads [to whatever degree] will provide opportunities for additional development of the parcels adjacent to the Project site. And, when viewed through the lens of practicality, the addition of 20,000 daily trips to the existing roads on which the Project will depend will only demonstrate that the growth caused by the Project will be a burden to the communities of Bonsall and Valley Center

C2b-97

The RDEIR sees this project as an island of self-sustaining residential and commercial uses that is removed from the necessity of engaging the world outside its boundaries. This arm's length existence will keep the surrounding properties, which are largely agriculture-oriented, from experiencing the pressure to rezone to complement the proposed Project's village densities. Of course, this is a fantasy that would make Disney envious. The fact is, there is very little that makes this Project self-sustaining in terms of jobs, consumer commercial opportunities, or infrastructure. Once in place, this project and its population will require greater commercial options, more infrastructure, better and more roads than are being planned, and more services.

C2b-98

The RDEIR 1.8.5 Conclusion rightly notes that the intensification of land uses on the Project site will encourage intensification on agricultural land uses in the immediate vicinity. Agriculture will not be able to operate as efficiently with the scores of sensitive receptors presented by the project limiting processes and procedures that are essential for efficient and cost competitive production. The inefficiencies resulting from the sensitive receptors and inadequate agricultural buffers for the Project will incline the farmers to calculate the potential profit to be gained by changing the land use designation and densities for their properties and to sell out. That is growth inducement

C2b-99

The RDEIR is correct to cite environmental changes to the Project site based on the 4+-million cubic yards of cut and fill proposed for the site. That is nearly 1.5 cubic yards of cut and fill for every single square yard of the Project site. Of course, some square yards will be treated more drastically than others. Some will be blasted to a depth greater than 50-feet. This significant disruption of the natural surface of the land is one of the greatest irreversible changes that will take place, and it is irretrievable once performed.

C2b-100

**QUESTION: How does moving 4 + million cubic yards of cut and fill meet the Goals and Policies of the Bonsall Community Plan or are you going to ignore the approved plan?**



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C2b-96 The FEIR thoroughly analyzes project circulation and road improvements, as thoroughly discussed in responses to comments C2b-40 and in comment cluster C2b-92 through C2b-95.

C2b-97 and C2b-98

The project would be growth inducing as discussed in response to comment C2b-13, however potential impacts are too speculative for evaluation in this FEIR at this time.

C2b-99

The project would be growth inducing as discussed in response to comment C2b-13, however potential impacts are too speculative for evaluation in this FEIR at this time.

The FEIR analyzes and discusses agricultural resources in subchapter 2.4, and in Appendix F. See also FEIR, Figures 2.4-1 through 2.4-2.4-7 for additional technical agricultural information on pesticide spraying, soils, Williamson Act lands, and off-site agricultural resources.

The Agricultural Resources Report considers limitations of off-site agricultural practices throughout Section 3.2 (Indirect Effects). The County acknowledges that restrictions on agricultural practices can potentially endanger off-site operations and for this reason the Agricultural Resources Report and the FEIR require implementation of agricultural buffers as a means of mitigating these effects. The project includes 15 agricultural Mitigation Measures, including adjacency mitigations addressing M-AG-1 (park adjacency), M-AG-2 (institutional adjacency) and M-AG-3 (Phase 4 adjacency).

C2b-100 through C2b-102

The project is consistent with Land Use Policy LU-6.6. The project Grading Plan is in FEIR Figure 1-15. Grading for the project maintains the overall general contour of the property, requiring 2,300 cubic yards of earth to be moved for each home (which would require a minor grading permit on an individual lot basis). This is consistent with projects of this size. 99.7 percent of all steep slopes are retained in open space and private roads are used that reduce grading by reducing the design speeds and overall development foot print, and following the contours of the property.

Please also see Appendix W for a discussion of conformance with the Bonsall Community Plan.

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Does the County truly think that the blasting and movement of 4+-million cubic yards of earth is consistent with the local community character? Is mitigation possible?

C2b-101

And, it will take an enormous amount of extra energy and effort to move the 4-million cubic yards of earth around the site to make it conveniently buildable for so many densely-packed dwelling units and so much commercial space.

C2b-102

Aside from transforming the land surface, moving so much earth and rock to accommodate the development of the Project will also permanently eliminate the Project site as biological habitat for native vegetation, wildlife and agriculture. Comments related to subchapter 2.5, Biological Resources, address the loss of foraging and breeding habitat and the beneficial interaction of wildlife with agricultural lands. State and federal laws address the losses of wildlife habitat.

Again, the General Plan recognizes the importance of natural habitats to the County, but the RDEIR suggests that losses of natural habitat can be mitigated by forcing wildlife, that is able, to move to other undeveloped lands in the County and by sacrificing native vegetation with the understanding that the losses caused by this individual Project are not significant.

C2b-103

Of course, the RDEIR does not adequately address the cumulative impact of scores of such individual losses caused by multiple projects and the irreversible loss of the majority of such habitat in the aggregation of these individual losses. Viewed incrementally, these individual project losses can be rationalized as minor and insignificant, but viewed collectively over the course of 50-years and on the scale of the entire County, they add up to a very significant majority of natural habitats [the California Department of Fish and Wildlife cites the loss of an estimated 85-90% of the historical extent of coastal sage scrub habitat in the state's Native Community Conservation Plan (NCCP) – Coastal Sage Scrub]. An acre here, an acre there, it all adds up.

Why does the RDEIR not address these cumulative irreversible losses of habitat within the County as a whole, or within the five-county southern California region, and the additive effect of large projects such as this Project?

The RDEIR also fails to adequately discuss the loss of agricultural land to this Project. The agricultural operations on and around the Project site are locally significant and typical of the operations that propel agriculture in San Diego County. The County's General Plan provides for the preservation of existing farmland as a key goal and principle. LEED ND standards discourage development on agricultural lands.

C2b-104

The County's land surface is finite. At what point does the loss of 504-acres of farmland in a Project like this one push the County over the edge to a completely urban County?

C2b-103 The FEIR thoroughly analyzes potential cumulative impacts to biological resources in subchapter 2.5.3. The Specific Plan, Ch. III, Section G, includes grading guidelines for all areas of the project and no more than 50 acres of the project site may be actively graded at any one time. Pollution controls must prevent stormwater contamination, over-sedimentation, and airborne dust. All project earthwork activities would occur only within project boundaries. Runoff would be directed to existing drainages through flow control, sediment settling detention basins, as discussed in the FEIR, subchapter 3.1.3 and in Appendices U-1, 2 and 3.

Cumulative impacts to biological resources is discussed in FEIR subchapter 2.5. The cumulative study area was determined based on the localized habitat area in accordance with the County's Report Format and Content Requirements for Biological Resources (County 2010b). The localized habitat area was defined by topography and man-made features that reduce wildlife movement and generally create a local wildlife ecoregion. Within this cumulative study area, 12 projects were identified for the evaluation of cumulative impacts (Figure 2.5-5 and Table 2.5-5). As discussed in detail in FEIR subchapter 2.5.3, cumulative impacts would be less than significant due to

C2b-104 The FEIR analyzes and discusses agricultural resources in subchapter 2.4, and in the project Agricultural Resources Report (FEIR Appendix F). See in particular, FEIR Figures 2.4-1 through 2.4-7 for additional technical agricultural information on pesticide spraying, soils, Williamson Act lands, and off-site agricultural resources.

FEIR Appendix F considers limitations of off-site agricultural practices throughout Section 3.2 (Indirect Effects). The County acknowledges that restrictions on agricultural practices can potentially endanger off-site operations, and for this reason the Agricultural Resources Report and the FEIR require implementation of mitigation measures to address these issues. See FEIR subchapter 2.4.5 for detailed mitigation measures.



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Beyond the irreversible impacts and losses of land features and biological habitat are losses to the structure of governance. After over 12 years of discussion, revision, and compromise; thousands of hours of citizen volunteer effort; and, the expenditure of nearly \$20 Million in taxpayer funds, the San Diego County General Plan, approved in August 2011, became, in the words of the California Supreme Court, "the constitution for future development." Citizens purchasing property could look to the County's General Plan to apply diligence regarding future land uses surrounding the property they wished to buy and make a judgment on the value and appropriateness of such a purchase.

C2b-105

**QUESTION: Will the County defend the General Plan from the depredations of Projects like this one?**

Moreover, this Project would subvert the intention of the state legislature to have every county adopt "... a comprehensive, long term general plan" [Calif. Gov. Code §65300; emphasis added]. For, in order to be approved, this Project would require the County to radically amend its general plan after only three years of existence to accommodate this Project. This Project was conceived as the present General Plan was being finalized and the applicant could have sought inclusion in it. The applicant did not.

C2b-106

Consequently, to be approved, this Project will require the County to substantially revise the General Plan's approved land use designations for the Project's site, and cause the County to strenuously distort the interpretation of the General Plan's goals, principles and policies [or to simply amend them to fit]. These actions will subvert the General Plan and throw the Bonsall and Valley Center Community Plans into disarray. This is not what the legislature had in mind.

C2b-107

Nor should a single commercial applicant be able to overturn the intent and authority of the General Plan to finagle approval for a single project that is inconsistent with that plan. Similarly, the Bonsall and Valley Center Community Plans, extensions of the San Diego County General Plan, will have to be amended to accommodate this Project. This Project will mangle the hard-won compromises on land use designations for both communities. Both communities were planned using the Community Development Model defined in the General Plan. Both communities adopted land use and zoning plans that gradually diminished densities from their core villages to the limits of their planning areas, consistent with the model. The present Project undermines those plans with no particular benefit to either community.

**QUESTION: The County needs to disclose the following information so that impacts are identified and required Mitigation can be implemented. When will this happen? Please forward to the Bonsall Sponsor Group.**

**A). 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**

C2b-108

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.



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C2b-105 The project is wholly consistent with the General Plan as thorough discussed in response to comment C2b-1. Please also refer to responses to comments C2b-55 (project protection of sensitive natural resources) and C2b-58 (project integration of natural features) for further discussion of these topics.

C2b-106 and C2b-107

The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

C2b-108

The FEIR adequately analyzes the potential environmental impacts associated with construction of the off-site physical improvements as required under CEQA. With respect to related property rights, please see Global Response: Off-Site Improvements – Environmental and Easement Analysis Summary Table, which describes the respective off-site improvements, corresponding environmental analysis, status of easement rights, and affected properties. Please also 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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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>
_____				

**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.

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. 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.

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.

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.

C2b-108  
Cont.

C2b-109

C2b-110

C2b-111

C2b-112



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C2b-109 Proposed improvements to West Lilac Road are discussed in their entirety in Chapter 1.0 of the FEIR. Specifically, the project proposes improvements to West Lilac Road from Old Highway 395 to Road 3. Details of the proposed roads are included in the table referenced above.

Impacts associated with these improvements have been considered throughout the FEIR, primarily under off-site improvements, and included in the cumulative impacts section of each subject as well. A figurative illustration of the improvements is included on Table 2.5-2a of the FEIR. Please also see response to comment C2b-108, above and related reference materials for additional information responsive to this comment.

C2b-110 The commenter accurately represents that a redesign of the roundabouts resulted from the Reid Middleton Roundabout Study. This is the design reflected in the project's current description. All impacts are located within the original footprints of the roundabouts. The roundabouts do impact off-site areas; however, these are within existing IODs with both slope and drainage rights. No new impacts have occurred based on the roundabout redesign. Please also see response to comment C2b-108, above and related reference materials for additional information responsive to this comment.

C2b-111 The commenter is referencing a second alignment study associated with the Reid Middleton Roundabout Study. This design was not selected to be included in the project and is not relevant for inclusion in the project's CEQA analysis. See response to comment C2b-110, above.

C2b-112 Please see response to comment C2b-111, above.

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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.

C2b-113

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.

C2b-114

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.

C2b-115

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

Executive Summary Comment DEIR Paragraph S.3 Areas of Controversy page S-4 – Item 2 – Infeasibility of the Project's undefined and infeasible Phasing Sequence

**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.

C2b-116

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

C2b-117

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.

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

C2b-118



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C2b-113 As discussed below, the scope of the slope rights included in the referenced IODs is sufficient to encompass all necessary grading and earthwork and, therefore, no additional slope rights beyond those granted are necessary for road construction. As to sight distance clearance, as shown in the Global Response, Off-Site Improvements – Environmental Analysis and Easement Summary Table, a clear space easement for grading would be needed on APN 129-190-44 and is necessary in order to remedy the existing deficient sight distance condition at the intersection.

Attachment 1 to the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, is a memorandum prepared by engineers Landmark Consulting that addresses access rights on both Mountain Ridge Road and Covey Lane (Landmark Memorandum). The Landmark Memorandum determined that for both roads, there are existing road easements or Irrevocable Offers to Dedicate Real Property (IODs) that provide the necessary rights to improve these roads to accommodate the proposed Project and no additional easements are required for road construction.

Landmark Memorandum Exhibit I, IOD for parcel no. 80-0494-A1, states that the rights offered include “the privilege and right to extend drainage structures and excavation and embankment slopes beyond the limits of the herein described right-of-way where required for the construction and maintenance of said County highway.” (Ex. I, p. 839.) Landmark Memorandum Exhibit J, parcel map no. 18536, further states “we hereby dedicate to the public that portion of Covey Lane for use as a street as shown on said map together with the right to extend and maintain drainage facilities, excavation and embankment slopes beyond the limits of said right-of-way.” (Ex. J, Sheet 1 of 4.) Thus, the IODs convey grading and drainage rights beyond the limits of the right-of-way.

Landmark Memorandum Exhibit H, Covey Lane Off-Site Access, illustrates the grading limits necessary to construct the public road; the grading limits are the furthest the slopes would extend on each side of the future public road. As shown, the grading limits do not extend beyond the available right-of-way, except adjacent to the right-of-way described in the IOD dedicated with Parcel Map No. 18536 and, as described above, this IOD includes slope rights that permit slopes beyond the limits of the right-of-way.

LETTER

RESPONSE

	<p>C2b-113 (cont.)          Thus, the slope rights associated with the IODs, as described above, along with the future dedication of right-of-way, as permitted with the private road easement that benefits Lilac Hills Ranch (see Landmark Memorandum Exhibit K), provide all of the rights necessary to construct the public road portion of Covey Lane to the Project boundary, including the slopes necessary to support said public road. As to sight distance clearance, as noted above and shown in the Global Response: Off-Site Improvements – Environmental Analysis and Easement Summary Table, a clear space easement for grading would be needed on APN 129-190-44 and is necessary in order to remedy the existing deficient sight distance condition at the intersection. Please also 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.</p> <p>C2b-114 Mountain Ridge Road is currently a two-lane private road that provides limited access from the project site to the County’s public road system via Circle R Drive. Mountain Ridge Road is not improved to its designated road design standard and is actually substandard with respect to its current ability to support road speeds of its users. As described in Chapter 1.0 of the FEIR and shown in Table 1-2, the project proposes to design Mountain Ridge Road as a wider, slower roadway. As proposed, the project would reduce dangerous vertical curves along the roadway. Additionally, the project proposes to remove the taper requirement at the intersection of Circle R Drive in order to provide a smoother and less impactful transition onto this road. As shown on FEIR Table 2.5-2 and illustrated in Figure 2.5-2b, no off-site impacts would occur to existing biology as a result of the road design. Additionally, no sight distance issue exists as the vegetation was cleared at this location. However, an off-site clear space easement would be required in order to ensure sight distance is maintained. With respect to the widening of Mountain Ridge Road to Public Road standards, all impacts are discussed in subchapter 4.9 of the FEIR. Additional biological resources affected by the road widening are identified and mitigation is proposed (see subchapter 4.9.2.5). Please also see response to comment C2b-108, above and related reference materials for additional information responsive to this comment.</p>
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LETTER

RESPONSE

	<p>C2b-115 Rodriquez Road is an existing 40-foot-wide private easement road that would require surface improvements necessary to accommodate the secondary emergency access requirement for the Phases 4 and 5. Specifically, Rodriquez Road would be improved from its current state to a 28-foot graded/24-foot paved roadway. The improvements needed by the project have been previously approved under the Sukup TM. Please also see response to comment C2b-108, above and related reference materials for additional information responsive to this comment.</p> <p>C2b-116 and C2b-117 The need for easements and use of eminent domain is not an environmental issue under CEQA as obtaining easements would not result a physical change in the environment. The FEIR adequately discloses all physical environmental impacts that would result from off-site improvements, including those that may require the use of eminent domain. In addition, the applicant has the required easements needed to construct required improvements. Also, refer to the Global Response: Off-site Improvements - Environmental Analysis and Easement Summary Table.</p> <p>Each mitigation measure will become a condition of approval for the project. The applicant will be required to implement the mitigation in accordance with the condition of approval and will be in violation of their permit if they fail to do so. Homes will not be able to be occupied without the mitigation being implemented per the condition of approval.</p> <p>C2b-118 The commenter raises concerns about the flexibility of project phasing and project grading in conjunction with project implementation. The Phasing Plan included in Part IV of the Specific Plan describes project grading. The Specific Plan indicates that both cuts and fills are proposed within each grading area and fill material would be transferred between the areas as required. Future grading plans would identify the location of grading, which could require grading in more than one phase to obtain required fill material. However, as stated in the Specific Plan, no more than 50 acres would be graded at the same time. Project grading is also discussed in Chapter 1.0 of the FEIR. With respect to the net import or export of fill, project construction would be a balanced cut/fill operation as shown in FEIR Table 1-4. Throughout the phasing of the</p>
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LETTER

RESPONSE

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**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)
<b>TOTAL</b>	<b>4,070,000</b>	<b>4,070,000</b>	<b>-</b>

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.

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.

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.

**QUESTION: Will the project need 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?**



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C2b-118  
cont.

C2b-119

C2b-120

C2b-121

C2b-118 (cont.)

construction, however, there are some areas with a net cut and other areas with a net import. The project will be using those sites with net cut for borrow sites. Phase 3 land will be used as a borrow pit, not a quarry, and the project will be required to comply with all applicable government regulations and requirements, including provisions of the County Grading Ordinance found in Section 87.101 et seq. of the San Diego County Code.

C2b-119 The commenter expresses general concern about the environmental impacts from the construction of the project. This is a conclusory statement and the issues of concern are addressed in more specificity in the preceding and following responses. Potential impacts from the construction of project grading and construction is fully analyzed throughout FEIR. The project would provide all infrastructure needed to serve the project and no issues of infeasibility have been identified.

C2b-120 and C2b-121

The phasing plan discussed in FEIR subchapter 1.2.1.10, as well as Section 5 of the Traffic Impact Study (Appendix E), describe the traffic trips for both the equivalent residential dwelling units and the commercial uses, if any, in each phase of the project. Pursuant to Section 5 of the Traffic Impact Study (Appendix E) and subchapter 2.3.5 of the FEIR, the phased traffic mitigation measures therefore relate both to residential and commercial traffic trips generated in each phase. Further, the commercial uses for the project generate only 33 percent of peak hour traffic trips at project build-out. As a result, the recommended mitigation measures are appropriately tied to the approval of a specified number of residential dwelling units associated with final maps because the commercial uses within each Final Map have been translated into equivalent residential dwelling units. Therefore, the timing appropriately considers both residential and commercial uses.

The commenter is concerned about the lack of fixed project phasing and potential traffic impacts that could occur due to the phasing flexibility. However, as described above since the traffic mitigation measures are tied to traffic trip generation that consists of both residential and commercial traffic trips, regardless of the phase the mitigation measures would be applied based upon the traffic trips that are generated by that phase. Thus no new impacts would occur due to the order of phasing that is ultimately implemented.

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**1.6 Project Inconsistencies with Applicable Regional and General Plans**

This section of the DEIR needs to include an unbiased evaluation of the Project's General Plan and Community Plan Consistency as of today, prior to a Board decision on the Project.

In this section and Chapter 3.1.4 Land Use Planning, the County has accepted the proposed advocacy position of the Applicant without any test of reason. This County states that indeed the Project as proposed is inconsistent with dozens of major General Plan Policies. **But if the Board approves the General Plan Amendment, by definition the Project would comply with the General Plan, because the approval of the Board's amended the General Plan.** This circular logic does not observe the fundamental tenant of CEQA – to assure that decision makers **prior** to making a land use decision are informed of the Project's Environmental Impacts, and have taken all possible measures to Mitigate Impacts. Factually disclose to the Lead Agency Decision Makers an unbiased evaluation of the General Plan and Community Plan policies included in August 2013 Public Comment contained in the letter Ltr 8-13-13 re General Plan and Community Plan Inconsistencies

C2b-122

C2b-122 Please refer to response to C2b-1 for a thorough discussion of project consistency with the General Plan and the Bonsall Community Plan. See also FEIR Appendix W.

COMMENT: Department of Transportation sent a letter to Mark Slovic on June 24, 2014 and I would like to have that attached to our comments however it was not easy to scan and attach. Copy is included in the submission of Valley Center or went directly to Mark Slovic in his file.

C2b-123

C2b-123 Comment noted. The letter will be included in the administrative record and provided to the decision makers for further consideration.

**WHERE DID THIS SELECTION CRITERIA COME FROM?** The relevant objective is Objective 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. **THE OBJECTIVE STATES "northern San Diego County," not Bonsall-Valley Center. Escondido is in northern San Diego County. The Downtown Escondido SPA meets the County's Objectives.**

C2b-124

C2b-124 The project is designed to be LEED-ND equivalent. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2 for a thorough discussion on this topic.

On page 4-5 and 4-6 the DEIR states:

"This project would create a new Village, providing an additional location within the VCCP/**why was Bonsall not mentioned?** area with services and housing opportunities. The project area is positioned in proximity to the I-15 and within existing districts for sewer water and fire service. There is an adequate road network offering multiple routes throughout the project and would which ultimately connect with freeway ramps to I-15. Placing the project in another location may result in additional issues related to traffic and services."

C2b-125

C2b-125 The project will be an additional village to the two existing ones already in Valley Center. The project straddles both Valley Center and Bonsall.



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With respect to the Downtown Escondido SPA, this statement is incorrect as is substantiated below:

1. "Placing the project in another location may result in additional issues related to traffic and services."

**The Downtown Escondido SPA is a superior location for traffic and services, generating far fewer Vehicle Miles Traveled than the Project. This argument is without merit.**

**QUESTION: Please review this assessment and inform the Bonsall Sponsor Group your decision in regard to CEQA requirements.**

On page 4-6 the DEIR states:

"Further, the applicant already owns the project site and cannot reasonably acquire an alternative site. Thus, in accordance with CEQA Guidelines Section 15126.6(f), the acquisition of an alternative location would be considered infeasible."

With respect to the Downtown Escondido SPA, this statement is incorrect. The County's rationale lists only two of the seven **non-exclusive factors** contained in CEQA Guidelines Section 15126.6(f). The Downtown Escondido SPA Alternate is consistent with the majority of the seven non-exclusive factors included in of CEQA Guidelines Section 15126.6(f) and an **analysis of the Downtown Escondido SPA Alternate must be included in the Project DEIR.** Refer to the entire discussion on page 3 of Ltr 8-19-13 Project Alternatives (attached).

on page 4-6 of the DEIR, the County concludes:

"Therefore, an alternative location was considered but rejected because of the (1) lack of a suitable-sized site, (2) lack of a site located in proximity to I-15 and existing service areas, (3) lack of ability to reduce VMT the potential for greater GHG emissions and traffic impacts, and (4) that the proponent cannot reasonably acquire an alternative site."

This conclusion has no substance for any of the four arguments presented in favor of the Project. Substantiation of this statement is below:

(1) lack of a suitable-sized site – **The Downtown Escondido SPA Alternate has more capacity than the Project in each of its land use categories.**

2) lack of a site located in proximity to I-15 and existing service areas- **The Downtown Escondido SPA Alternate is in closer proximity to I-15**

C2b-126

C2b-127

C2b-128

C2b-126 through C2b-128

Escondido Downtown Specific Planning Area (located nearly 15 miles away from the proposed project) as an off-site alternative in the FEIR. Section 15126.6(a) of the CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The CEQA Guidelines provide several factors that should be considered with regard to the feasibility of an alternative: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control or otherwise have access to the alternative site (if an off-site alternative is evaluated). The suggested Escondido alternative is outside the jurisdiction of the County of San Diego and would, therefore, fail to meet the project objective of providing a range of diverse housing types with the jurisdiction of the County of San Diego. Additionally, senior housing is a significant and desirable housing type in the proposed project, due to the County's General Plan Housing Element Background Report which identifies senior housing as a need for future accommodation by new development. The 468 deed-restricted senior housing units in the development plan comprise 27 percent of the total number of housing units, and the Village style design of the project offers particular advantage to senior populations via providing proximity to services and shopping.

The range of proposed housing types in the proposed project also includes single-family detached homes abutting open space. This housing type cannot be duplicated in a small-lot urbanized environment such as the Escondido Downtown Specific Plan Area (see Figure II-4, page II-12, of the Escondido Downtown Specific Plan, which Figure is attached) that lacks any adjacent open space areas.



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RESPONSE

	<p>C2b-126 through C2b-128 (cont.)</p> <p>Also, the applicant cannot reasonably, economically and timely acquire a large block of parcels under the Escondido alternative that are necessary to develop a comparable project that includes single-family detached homes and single-story senior housing. As shown in Figure II-4, page II-12, of the Escondido Downtown Specific Plan, the Escondido Downtown Specific Plan residential areas are comprised almost exclusively of very small legal parcels that are already developed. Those parcels are mostly in separate fee title ownership. The applicant would therefore be required to negotiate for and acquire hundreds of separate occupied and operational legal parcels from diverse ownership interests to assemble land for a comparable development project. Also, the existing structures on most of the parcels would have to be demolished, and the operations and uses on those parcels, many of which are medium to long-term leases, would also have to be relocated at significant cost. Such tasks are unrealistic, costly, and infeasible. Please refer to the December 16, 2014 letter from project applicant regarding the Escondido Downtown Specific Plan submitted to the County.</p> <p>The alternatives evaluated in detail within the alternative subchapter include: (1) No Project/No Development Alternative, (2) No Project/Existing Legal Lot Alternative, (3) General Plan Consistent Alternative, (4) Reduced Footprint Alternative, (5) Reduced Intensity Alternative, (6) 2.2 C Alternative, (7) Roadway Design Alternative, and (8) Mountain Ridge Road Fire Station Alternative. Each of these alternatives was selected in order to either: (1) avoid or minimize significant impacts associated with the project, or (2) compare potential effects with the General Plan Consistent alternative, which is considered a viable development option for planning purposes.</p>
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