

LETTER

RESPONSE

Letter I21

July 21, 2014

Mark Slovick  
Project Manager  
County of San Diego, Planning & Development Services  
5510 Overland Ave., Suite 310  
San Diego, CA 92123

Dear Mr. Slovick:

The Lilac Hills Ranch, "one of the biggest housing developments every proposed for the area" according to the U-T newspaper, is the wrong development, at the wrong time, in the wrong place. The scale of this proposed development with 1,700 homes (composed of 903 single-family homes, 164 single-family attached homes, 211 residential "units", 468 single-family senior homes), in 608 acres, 5,000 residents, 90,000 square feet of commercial, office and retail space, 50-room inn, senior community center, group residential care facility, memory care facility, fire station, k-8 school, a town center, and 2 neighborhood centers is that of a small city and has no business in Valley Center, a rural, back-county area.

I21-1

Given the current drought conditions and the recent mandatory water rationing that is being instituted, I can't understand how any sane person could approve creating another city anywhere, much less in a rural area. The always-high – and now extremely high – fire danger in Valley Center only compounds the folly of even considering a large-scale, high density development such as this. Density of this intensity belongs in cities, not in rural areas, period. Given the mixed uses proposed, the density will be much greater than the number of homes alone would indicate, since all the workers at the inn, 2 care facilities, school, fire station, town center, and commercial, office and retail spaces will not be residents. They will be commuters, clogging the roads and creating a significant danger to all who need to use the roads in the area for daily use, as well as during a wildfire. This development would take the current Valley Center population density of less than 100 people/square mile and increase it dramatically. Assuming 5,000 residents, it would increase Valley Center's population by almost 55% and it's density to 152 people/square mile. If one adds the 2,500 more people (conservatively) for all the non-resident workers, that increase Valley Center's population by over 80% and increase it's density to almost 180 people/square mile, an increase of more than 80%. At only 5,000 residents, Lilac Hills would have a density of over 5,260 people/square mile. In comparison, San Diego city's density is only just over 4,000 people/square mile. Density of this magnitude clearly does not belong in a rural area like Valley Center.

I21-2

I21-3

I21-4

I21-5

I21-6

Valley Center is a rural area and, as our rural areas are scarce to begin with, should NOT be developed into another San Diego or Escondido. These new facilities, if warranted at all, should be built within already-developed areas. The Lilac Hills Ranch should be low-density residential (absolute minimum 5 acre lots, with a 10-acre minimum approaching a reasonable density) with only single-family homes permitted. And NO new development should be allowed unless a parcel will perk and until after our water supplies are improved and adequate current and future supply has been guaranteed for all existing residents and any future ones. Any other plan is sheer folly and will have severely negative consequences for current and future residents in terms of traffic congestion, public safety (wildfires and traffic accidents), lack of water, and destruction of the rural character of Valley Center.

I21-7

I21-8

I sincerely hope Planning & Development Services will not approve a project that cannot be justified on any grounds. This proposed development will destroy the rural character of Valley Center; increase the wildfire danger for all; use water resources that are simply NOT available; and create an entire new city with a density that is 30% greater than that of San Diego city. It is the wrong development, at the wrong time, in the wrong place.

I21-9

Sincerely,  
*M Craggs*  
MCraggs  
Valley Center, CA 92082

I21-1 The County acknowledges your comment and opposition to the project. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

I21-2 The availability of water supply and consideration of existing and future potential drought considerations have been addressed in the Water Supply Assessment (WSA) was prepared for the project by the by the Valley Center Municipal Water District (VCMWD) pursuant to Senate Bill 610 and Senate Bill 221 (see Appendix Q of the FEIR). The WSA report evaluates water supplies that are or will be available during normal, single dry year, and multiple dry water years during a 20-year projection to meet existing demands, existing plus projected demands of the project, and future water demands served by the VCMWD. As detailed in the WSA and in subchapter 3.1.7 of the FEIR, the VCMWD determined there would be adequate water supply to meet expected water demands for a 20-year planning horizon, including the project. In addition, the VCMWD issued an updated letter dated May 6, 2014 verifying that the conclusions of the WSA are still valid considering recent drought conditions and associated water use restrictions. This letter has been included as a cover letter to Appendix Q of the FEIR.

I21-3 Wildfire hazards are addressed in subchapter 2.7.4.2 and are analyzed in the Fire Protection Plan included as Appendix J of the FEIR. As this comment does not raise a specific issue with regard to the content of the FEIR, a more detailed response cannot be provided and is not required.

I21-4 The County acknowledges that this project would result in increased density and the supporting uses (such as commercial, school, recreational facilities) would also bring additional (non-residential) density to the project site. The County acknowledges the general opposition to the proposed density of the project, as expressed in this comment. This 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.

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	<p>I21-5 The adequacy of the roads to accommodate the traffic that would be generated by the project has been evaluated and disclosed in subchapter 2.3 and Appendix E of the FEIR. Roadway improvements will be required to mitigate significant impacts, where feasible. The adequacy of roads for purposes of evacuation during a wildfire is also addressed in FEIR subchapter 2.7.2.4, and an Evacuation Plan was prepared for the project (see Appendix K). The Evacuation Plan details measures for the evacuation of residents and shows that there are adequate evacuation routes in the event of an emergency. This comment does not raise a specific issue with regard to the information contained in the FEIR; therefore, a more specific response is not possible and is not required.</p> <p>I21-6 The County acknowledges this comment; however, the various assumptions and calculations provided about the increase in density in Valley Center cannot be verified. According to the project description and the residential limits set in the Specific Plan, the project would be able to accommodate a maximum of 1,746 homes. The County calculates density based on residential uses and does not include uses not defined as residential according to the County Zoning Ordinance, such as institutional uses, hotels, and employees associated with commercial uses. The commenter is correct that there would be a non-resident population that would use the site, associated with the various non-residential uses. The comment expresses opposition to the project and does not raise a specific issue with regard to the information contained in the FEIR. 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.</p> <p>I21-7 The comment expresses the opinions of the commentator. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Please see responses to comments 121-2 through 121-6 above.</p>
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	<p>I21-8 The County acknowledges your comment and opposition to the project. As noted in response to comment I21-2 above, a water supply assessment was completed for the project that demonstrates adequate water is available to serve the project. Adequate percolation for septic systems is not required for this project as sewer service is proposed. The comment expresses opposition to the project and does not raise a specific issue with regard to the information contained in the FEIR. 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.</p> <p>I21-9 The County acknowledges your comment and opposition to the project. Please refer to FEIR subchapters 2.1 for a discussion of aesthetic impacts and 3.1.4 for a discussion of community character. 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.</p>
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