

LETTER

RESPONSE

RE: Comments on Lilac Hills Ranch Revised Draft Environmental Impact Report
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alternative due to 1) a lack of a suitable-sized suit; 2) lack of ability to reduce vehicle miles traveled for greater GHG emissions and traffic impacts; and 4) that the proponent already owns the proposed site and cannot reasonably acquire an alternative site.¹²⁷ None of these reasons are both supported by the evidence and legally tenable.

An offsite alternative would meet the project's objectives, and could be constructed in the City of Escondido. This City is adjacent to I-15 and is much closer to existing service areas, and would therefore drastically reduce VMT related to Project travel. As the recently adopted Escondido General Plan demonstrates, there is also plenty of room to put the Project's planned 1,700 units, as the General Plan anticipates development of more than 6,000 new residential units.¹²⁸

The EIR should also set forth and frame an alternative as a "low carbon" alternative and discuss the types of measures and land use decisions that would be required for the Town to comply with AB 32 targets and move forward to 2050 reduction targets. (California Attorney General 2009). Mitigation Measures to encourage the "low carbon" alternative are described in these comments and attachments and can be easily achieved while reaching the project objectives. To the extent the low carbon alternative or feasible mitigation measures are rejected that decision must be supported by substantial evidence. These alternatives would meet the project's basic goals and objectives and, therefore, must be considered.

In analyzing the no-project alternative, the EIR must discuss the need for this project and whether the uses that would potentially utilize the Project can be accommodated in existing areas. As CAPCOA states in its white paper, one way local governments can avoid significant increases in greenhouse gas emissions and help solve the problem of global warming is to "facilitate more efficient and economic use of the lands" already developed within the community (CAPCOA 2008). Reinvesting in existing communities is "appreciably" more efficient than new development and may even result in a net reduction of greenhouse gases (CAPCOA 2008). The EIR should consider an alternative that relies more on higher-density mixed commercial/residential development projects on existing disturbed lands in order to support the reduction of vehicle trips, promote alternatives to individual vehicle travel, and encourage efficient delivery of services and goods (Office of the California Attorney General 2008).

An analysis of alternatives should also quantify the estimated greenhouse gas emissions, quantified impacts to biological resources, water resources including water quality and water availability, and traffic resulting from each proposed alternative.

O1-141
cont.

O1-142

O1-143

O1-144

¹²⁷ DEIR, at 4-4 to 4-6.
¹²⁸ See p. 3-23 of Escondido General Plan EIR, available at:
<http://www.escondido.org/Data/Sites/1/media/PDFs/Planning/GPUUpdate/VoIIProjectDescription.pdf>

O1-142 The comment suggests that a "low carbon" alternative should be presented to demonstrate compliance with AB 32 targets. However, the proposed project already implements numerous measures that would reduce carbon emissions and meet the goals of AB 32. As described in the project description (Chapter 1.0 of the FEIR), the project is designed to provide a neighborhood pattern that emphasizes walkable streets, compact development, mixed-use neighborhood centers. The project implements traffic calming, provides accommodations for a mass transit bus stop, and includes a regionally coordinated Transit Demand Management program. Structures within the project would meet state green building standards and exceed 2013 state energy efficiency standards (Title 24) by five percent; landscaping will be drought tolerant and consist of native and regionally appropriate species. For details on the measures that would be implemented to reduce GHG emissions, refer to subchapter 3.1.2 of the FEIR. As the project already incorporates various low carbon measures into the project design, an additional alternative is not required.

O1-143 CEQA Guidelines do not require analysis of whether the project is needed as part of the no project alternative analysis (see CEQA Guidelines Section 15126.6(e)). The comment also suggests that the analysis should consider whether the uses could be accommodated in existing areas. Please refer to response to comment I51h-1 for discussion of alternative sites. In addition, the project does include adequate measures to reduce GHG emissions. See O1-142 for additional details about project GHG emission.

O1-144 Chapter 4.0 of the FEIR provides the analysis of alternatives and includes adequate detail to determine the potential impact to biological resources, water resources and traffic for each alternative. As the comment does not raise a specific issue that was lacking, a more detailed response cannot be provided.

V. CONCLUSION.

The Center encourages the County to deny the proposed project. Thank you for the opportunity to submit comments on the proposed Lilac Hills Ranch project. Please do not hesitate to contact the Center with any questions at the number listed above. We look forward to reviewing any further environmental documentation on this project. Please place us on the notice list for all future project meetings.



O1-145

O1-145 Comment noted.

Sincerely,

Chelsea Tu

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