

Letter O3c

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Subject: DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA),PDS2012-3810-12-001 (SP), Draft Environmental Impact Report (DEIR) **Project Alternatives**

Dear Mr. Slovick:

This firm represents Heart of Valley Center, a California Non-Profit Corporation. On its behalf, we offer the following comments on the Alternatives Section of the Lilac Hills Ranch DEIR.

By way of brief summary, the DEIR Project Alternatives Analysis in Chapter 4 of the Lilac Hills Ranch DEIR is grossly defective in meeting CEQA requirements.

The biased DEIR "Objectives" (See Attachment "A", August 16, 2013 Comment Letter from Mark Jackson) have led to the selection of a limited number and scope of alternatives that have been subjected to minimal to modest levels of comparative analysis. The failure to identify at least one, if not two, off- site Alternatives for comparative analysis is a fatal legal flaw and indicative of the overall bias in the DEIR towards building The Project in only one location.

In addition, and equally as fundamental to an adequate Alternatives analysis, the DEIR fails to accurately and fairly identify and evaluate significant environmental impacts. For example, impacts upon agricultural resources have been mischaracterized and understated. Traffic impacts have also been significantly understated. The DEIR

O3c-1

O3c-1 The comment provides introductory comments to the letter. The commenter's opinion and discussion of project concerns is acknowledged and included in the project's FEIR for the decision makers to consider.

The project objectives were developed pursuant to CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project.

There is no legal requirement that an EIR analyze in detail a minimum number of off-site alternatives. Pursuant to CEQA Guidelines Section 15126.6(a), "There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason." As stated in CEQA Guidelines Section 15126.6(f)(2)(B), if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. This issue is fully addressed in the FEIR subchapter 4.1.1.1.

The comment states that the FEIR "fails to accurately and fairly identify and evaluate significant environmental impacts," but does not provide any explanation, information, specific examples, or other support for the comment. The FEIR is adequate and fully addresses the impacts associated with the proposed project. The impact analysis and significance conclusions presented in the FEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air quality, greenhouse gas emissions, biology, and cultural resources) provided as appendices to the FEIR.

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needs to be completely revised with emphasis upon accurate impact analysis and then a responsive and meaningful selection of project Alternatives should be presented for specific comparative analysis.

Heart of Valley Center, as well as the communities of Bonsall and Valley Center, support the General Plan Consistent Alternative as the proper land use density and zoning for this Project. The 110 unit residential density with A70 zoning is the maximum density land use that the Circulation Element Road Network will support without Direct Development Impact.

The proposed 110 unit semi-rural General Plan Consistent Alternative is consistent with the overall Land Use design for the Valley Center Planning Area that is the regional basis of the August 3, 2011 San Diego County General Plan. This design locates Village density growth in the North and South Villages of central Valley Center where existing infrastructure is available to accommodate the region's share of San Diego County future growth.

A. The DEIR Impermissably Fails To Identify And Compare Off-Site Alternatives

The Lilac Hills Ranch Project Alternatives from Section 4.0 are:

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

The Alternative Location Section 4.1.1.1 contains the equivalent of a "card trick" by taking Objective 1 ("Develop a community within northern San Diego County..."(DEIR 1.1)) and redefining it as building the project only on 600 acres in the "Valley Center-Bonsall area". This recasting of project Objective 1 then leads to a summary dismissal of alternate project sites and a failure to adequately analyze alternate project sites.

When a project seeks to change a site's land use designation as the LHR Project does, consideration of alternative sites is particularly important. A "proposed change in allowed uses raises a policy question of whether the site is appropriate for the new use." Kostka & Zischke, *Practice Under the California Environmental Quality Act* §15.26 at pp. 759-760 (March 2013 Update). At a minimum, resolution of this question depends on a comparison of the advantages and disadvantages of the project site with other sites that are already actually designated for the proposed use. See e.g., *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, 1179. Under these circumstances, the County as the lead agency should require an evaluation of alternative sites.

O3c-1
cont.

O3c-2

O3c-3

O3c-2 As stated in CEQA Guidelines Section 15126.6(f)(2)(B), if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. This issue is fully addressed in the FEIR subchapter 4.1.1.1, Alternative Location. The need to consider larger parcels, or groups of contiguous parcels available for development was necessary as a project alternative because the proposed project could not be feasibly located on small noncontiguous parcels due to infrastructure requirements and to meet the walkable, mixed-use village concept. The analysis of off-site locations was based on knowledge of the availability of land in the general area and consideration of CEQA Guidelines Section 15126.6(f)(1), which states that factors that must be taken into account when considering feasibility of alternatives include "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or that site is already owned by the proponent)." The FEIR explains that alternative locations were considered but rejected due to "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." Reasons for elimination of off-site alternatives are fully discussed and disclosed in the FEIR and adequately meet the requirements of CEQA. Refer to FEIR subchapter 4.1.1.1 for additional details.

O3c-3 Two alternative sites designated as Village in the Valley Center Community Plan were considered and addressed in subchapter 4.1.1.1 of the FEIR. However, these sites were rejected for reasons identified in response to comment O3c-2.

The two alternative sites designated as Village by the Valley Center Community Plan pose many constraints and disadvantages relative to the location of the proposed project, including encumbered emergency access and evacuation; greater potential vehicle miles traveled (VMT) and associated greenhouse gas (GHG) emissions due to the greater distance of these sites from regional facilities (e.g., transportation corridors, employment centers and shopping); and substantially greater constraints and impacts relative to traffic and required roadway improvements to provide the increased capacity necessary to accommodate the proposed intensity. Such alternatives would result in greater traffic impacts and GHG impacts. Ultimately, the alternative Village sites were considered but rejected. Refer to FEIR subchapter 4.1.1.1 for additional details.

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The CEQA Guidelines outline three issues lead agencies should consider when screening potential alternative sites for inclusion in the EIR. See 14 Cal. Code Regs. §15126.6(f)(2): (1) Whether any of the project's significant impacts would be avoided or substantially lessened by locating the project elsewhere-this includes locations which are environmentally superior to the project site; (2) When a lead agency concludes that no feasible alternative locations exist, it should include its reasons in the EIR; (3) The agency should determine whether alternative locations have been sufficiently analyzed in a previous document.

Specific nonexclusive factors agencies may consider when assessing the feasibility of alternative sites include: site suitability, economic viability, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, whether the project proponent already owns the project site and whether the project proponent can acquire, control or have access to the site if it does not own it. 14 Cal. Code Regs. §15126.6(f)(1); *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576. None of these factors, taken in isolation, sets a limit on the scope of reasonable alternatives to be considered in the EIR. 14 Cal. Code Regs. § 15126.6(f)(1).

Employing the foregoing CEQA authority and factors, there are multiple alternative off- site locations appropriate for detailed analysis and comparison. For example, there are hundreds of acres of land immediately adjacent to the existing North and South Villages of Valley Center which under the County general plan and the Valley Center Community Plan could accommodate the number of housing units proposed by the Applicant without a general plan amendment. There is room for related commercial development and there is infrastructure in place to support the growth which is contemplated under both the County of San Diego and Valley Center Community Plans.

In addition, the DEIR authors need to evaluate the Escondido Downtown Specific Planning Area for at least one alternative project site. Specifically, the City of Escondido **SINCE 2007** has been developing an infill redevelopment mixed use Downtown Specific Plan Area (SPA) less than 14 miles south from the proposed Lilac Hill Ranch project. The Escondido Downtown SPA has a (City of Escondido) General Plan build-out Equivalent Dwelling Unit increase (EDU) of 5,275 EDU plus additional mixed use commercial uses.

Unlike the Accretive Project, a Downtown 1,746 EDU Escondido Equivalent Project would **meet Smart Growth and LEED-ND location requirements**. It would be an infill development with requisite infrastructure and **truly within walking distance of the Escondido Transit Center** which has access to the Sprinter Train as well as being a hub for North County and Metropolitan Bus lines. Additionally, this location is less than a mile from access to I-15.

The 1,746 EDU Escondido Equivalent Project would benefit from neighboring, existing medical, school, fire and police facilities, and very importantly, from Circulation Element Roads and mass transit. The Air Quality and Greenhouse Gas impacts of

O3c-4

O3c-5

O3c-4 Please see response to comment O3c-2. The Village sites, which were considered as alternative sites, are discussed in detail in response to comment O3c-3. The Village sites would not meet project objectives as discussed in FEIR subchapter 4.1.1.1 and as discussed above, would result in potentially greater impacts associated with hazards, traffic and GHG emissions.

O3c-5 The County disagrees that the project is required to include the 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 is located nearly 15 miles away from the proposed project. This suggested alternative would therefore fail to meet a project objective of providing a range of diverse housing types with the jurisdiction of the County of San Diego to accommodate expected population growth and to assist the County in meeting the requirement to accommodate its fair share of housing for regional population growth as required by Government Code Sections 65583 and 65584.

The County's General Plan Housing Element Background Report (April 2013) identifies the housing needs of the growing elderly population to require special considerations such as proximity to services and shopping, as well as more affordability, all which can be achieved in the Village-style design of the proposed project. Further, locating senior housing in another jurisdiction does not assist the County in accommodating its fair share of housing needs for the elderly.

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	<p>O3c-5 (cont.)</p> <p>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) that lacks any adjacent open space areas.</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 any existing business operations would also have to be relocated at significant cost to the project applicant as part of any purchase transaction for a parcel. Such tasks are unrealistic and infeasible. Please refer to the December 16, 2014 letter from the 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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RESPONSE

	<p>O3c-5 (cont.)</p> <p>These alternatives permit informed decision making and public participation because there is enough variation amongst the alternatives to provide a reasonable range. As required under CEQA, the alternatives would avoid or minimize significant impacts associated with the project while also meeting the project objectives. The alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic objectives of the project. Please refer to Table 4-2 for a breakdown of project alternatives impact comparison.</p> <p>The alternative posed by the commenter would not serve any new purpose, and therefore, is not needed to create a “reasonable range” as required by CEQA. The court in <i>Citizens of Goleta Valley v. Board of Supervisors</i> (1990) 52 Cal.3d 553 held that in assessing the feasibility of alternatives located off-site, a jurisdiction may consider whether a project proponent owned or had reasonable access to the alternative site and whether such sites were in its planning jurisdiction. The law does not require in-depth review of a project alternative which cannot be realistically considered and successfully accomplished. The proposed alternative site is not under the ownership of the project proponent and is not located within the jurisdiction of the County of San Diego.</p> <p>An alternative site in the County for the project was considered taking into account a number of considerations including the existing General Plan (or Community Plan) land use designations, and availability of infrastructure. No other similarly sized (600+ acres) parcel, or group of contiguous parcels available for assembly, was available for development that met the project’s objectives. The two village sites identified in the Valley Center Community Plan) were considered and rejected.</p>
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siting the project in Downtown Escondido are orders of magnitude less than the proposed project site in rural greenfield agricultural lands.

Impacts on Biology, Agriculture, and Community Character would be non-existent. The Escondido Downtown SPA easily accomodates a project of equivalent size to the proposed Lilac Hills Ranch project and is consistent with both the City of Escondido General Plan and the County of San Diego General Plan.

The Escondido Downtown SPA also provides a more viable solution for senior living facilities, including Assisted Living, because it is within two miles from the two Palomar Hospitals and major medical facilities.

The Downtown Escondido Interim SPA document is available at the following link, and is included with this letter as Attachment "B".
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Please also compare the Escondido Downtown SPA level of specificity and completeness of design to that of the Accretive Lilac Hills Ranch Specific Plan. The Escondido Downtown SPA is more complete than the Accretive Lilac Hills Ranch Specific Plan and can be efficiently analyzed as a project alternative in a revised DEIR.

The Final Downtown Escondido Specific Plan Area was approved by the Escondido City Council on August 7, 2013. Building in this area would embody the quintessential "Smart Growth" goals and policies of the San Diego County General Plan.

Infill development is recognized County wide as the ideal path towards meeting housing needs and avoiding and/or reducing a wide range of serious impacts on the environment. In the context of the proposed Lilac Hills project, building the project within the Downtown Escondido Specific Plan area will not require a far reaching set of amendments to the County General plan. This advantage needs to be addressed in the Alternatives Section of the DEIR as well as in the General Plan/Community Plan Consistency analysis in the revised DEIR.

The revised DEIR should also include a review of the region wide benefits of focusing development in existing cities as opposed to rural unincorporated areas. In this regard, please review and address the findings in Attachment "C" entitled, "An Alternative Development Scenario for San Diego County" a report dated June 9, 2010, prepared on behalf of the Cleveland National Forest Foundation by Larry Orman, Executive Director of GreenInfo Network (Appendices to the report are not included in this attachment).

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O3c-8

O3c-6 Please see response to comment O3c-5.

O3c-7 Please see response to comment O3c-5.

O3c-8 Regional growth reallocation from the unincorporated County to surrounding cities is outside the scope of the project level FEIR.

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B. The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives

These three "Alternatives" are mere generalized density variations of the Project. There is no explanation of how the footprint variations between and amongst the Alternatives were determined. This is very important. What were the considerations for example in the locations and mix of homes in the Reduced Footprint Alternative (Alternative 5)? There is no mapping of lot locations so all the public knows is the proposed number of units—floating somewhere on the project site.

An EIR must contain sufficient information about each alternative to permit an evaluation of the alternatives' and the project's relative merits. 14 Cal. Code Regs. § 15126.6(a). The analysis must contain enough concrete information about each alternative to allow a fact-based comparison of the alternatives with the project. 14 Cal. Code Regs. §15126.6(d). An EIR should "explain in meaningful detail" a range of alternatives to the proposed project. *Laurel Heights Improvement Association v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 406.

The DEIR lacks fact-based comparison, meaningful detail and concrete information. For example, the absence of rationale for alternative designs and the comparative details on actual impacts leads to material questions in almost all the impact categories.

Why, for example, are there no senior residences in Alternative 5? Would not traffic generation be reduced by building single family senior homes versus standard single family homes?

Why is there no "Single Family Attached" housing in the Reduced Footprint Alternative (Alternative #4) when, naturally, more attached units can be built on less acreage?

How can the water reclamation be exactly the same for all of these alternatives?

Why are only 40 extra acres of sensitive biological resources preserved under Reduced Intensity Alternative (#5) when the number of residential units is cut by half?

What is meant by "Circulating Road" versus "Non-Circulating Road"? What explains the similar "Non-Circulating Road Impacts" for these three alternatives—even the Reduced Intensity Alternative (#5)?

Importantly, there is evidence (see letter dated August 6, 2013 from Kevin K. Johnson APLC) that the project applicant does not have road easement rights and line of sight conditions that will allow the project to be built. Do any of these Alternatives present road infrastructure needs that don't require the subject easements and lines of site?

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O3c-15

O3c-9 The parameters for defining the footprint of the Reduced Footprint Alternative are clearly stated in FEIR subchapter 4.5.1. This alternative is designed to reduce the development footprint in order to increase preservation of sensitive biological resources on-site. As shown on FEIR Figure 4-3, the Reduced Footprint Alternative would entail clustering development on approximately 441.3 acres and the preservation of 166.7 acres of on-site biological open space. Residential development would be removed from the upland habitat in Phases 1, 2, and 3 of the project, and wetland buffers would be increased from 50 to 100 feet throughout the site. FEIR Figure 4-3 provides a conceptual land use plan wherein the development footprint is clearly delineated and the areas of development are clearly labeled with land use proposed under the alternative. Similarly, the modifications to the project's footprint and pattern of development are clearly stated in FEIR subchapter 4.6.1 for the Reduced Intensity Alternative and FEIR subchapter 4.7.1 for the 2.2C Hybrid Alternative.

Each of the alternatives provides sufficient detail for a meaningful analysis and comparison of impacts relative to the proposed project. Pursuant to CEQA Guidelines Section 15126.6(d), "...the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the proposed project."

O3c-10 The County acknowledges that single-family senior homes do have a lower trip generation rate than traditional single-family. However, under this alternative, the total number of units on-site is being substantially reduced from 1,746 to 881. No attached single-family, senior housing, mixed-use or group care facilities would occur in Alternative 5. Proximity of commercial services and recreational facilities are practical considerations for the placement of senior housing. Due to the reduced intensity of the project, certain amenities and uses would no longer be viable, and without the viability of on-site neighborhood-serving commercial uses and other community facilities, the project becomes a less desirable location for senior housing.

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	<p>O3c-11 CEQA does not require all possible design alternatives be analyzed. As an alternative to the project’s design, as stated in FEIR subchapter 4.5.1, no single-family attached was provided in the Reduced Footprint Alternative in order to allow a lower density alternative within a smaller footprint. The implementation of the “Village” concept, identified in the project objectives, requires that a certain proportionality of uses be provided on-site retain its viability and for a “village” to function.</p> <p>The project includes single-family attached units in the Town Center, where supporting commercial uses would also be located. This mixture of uses, supported by the other residential uses, school and parks, creates the necessary sense of place to have a viable Village.</p> <p>Because of the reduced amount of developable acreage under this alternative, single-family attached was not included. If single-family attached were to have been included within the substantially reduced footprint, the attached housing type would have been needed to be provided at a much greater intensity, possibly reaching 4 or 5 stories in height. This would have created substantially greater community character and visual impacts than the proposed project, and thereby, was rejected from consideration early in the process.</p> <p>O3c-12 The Reduced Footprint, Reduced Intensity and 2.2 C Alternative would be constructed at too great a density to allow for on-site septic. Therefore, like the project, each would require the provision of a centralized on-site wastewater treatment. The Water Reclamation Facility (WRF) would be sized accordingly under each alternative, appropriate for the intensity of development proposed, but would generally employ the same technology.</p> <p>O3c-13 As stated in FEIR subchapter 4.6.1, the intent of the Reduced Intensity Alternative is to provide an alternative that would reduce impacts associated with intensity of land use. Impacts associated with land use intensity generally include traffic, air quality, and noise. The Reduced Intensity Alternative would create a less dense community with a smaller commercial area compared to the project. As concluded in FEIR subchapter 4.6.3, due to the reduced intensity of development and fewer ADT, operational air quality, traffic, and noise impacts would be less under this alternative as compared to the project.</p>
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	<p>O3c-13 (cont.) The project site contains relatively little sensitive biological habitat and this alternative proposes 104.1 acres of biological open space, the same as the project. This represents preservation of the sensitive habitat on-site. Therefore, like the project, the most sensitive habitat (i.e., wetlands) would be preserved.</p> <p>O3c-14 The FEIR Chapter 1.0 (subchapter 1.2.1.4) discusses the distinction between "Circulating" versus "Non-Circulating Roads." "Circulating Roads" refer to the backbone circulation network of the project. "Non-Circulating Roads" refers to roads that are only internal to the project site and would be constructed in conjunction with implementing tentative maps.</p> <p>O3c-15 These three alternatives are feasible. Refer to Global Response: Off-Site Improvements - Environmental Analysis and Easement Summary Table, attached to these responses to comments for detail relating to all relevant easement issues.</p>
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Are any of these Alternatives actually feasible given the road easement and line of sight issues as well as the lack of sewer and recycled water line easements addressed under separate cover? (See July 31, 2013 comment letter from resident Mark Jackson.)

O3c-15
cont.

Will each of these Alternatives require the 10 Exemptions from County Road Standards being requested by the Applicant but not disclosed in the DEIR? How can the need for some or all of these exemptions be avoided by each Alternative?

O3c-16

Also, the "comparative analysis" within the Alternatives Section of the DEIR seems to assume that there are linear mathematical consequences for each increment of increased traffic. This is an over simplification and is misleading.

O3c-17

The failure of DEIR Table 4-1 to compare actual ADT numbers between the various alternatives is unjustifiable. For the table to actually help the public and the decisionmakers to understand the traffic impacts between and amongst all six alternatives, the ADT numbers need to be presented and the variations carefully discussed.

DEIR Table 4-1 should also include numbers on the Green House Gas impacts of the project and the alternatives once said numbers are actually developed. (See correspondence from Shute, Mihaly and Weinberger dated August 19,2013 on the inadequate GHG analysis in the DEIR)

O3c-18

How can the Reduced Footprint Alternative (#4) require the exact same amount of "Manufactured Slopes" as the Project itself? Similarly, how does the Reduced Intensity Alternative footprint, have just 2.5 acres less manufactured slopes than the project itself (65 vs 67.5)?

O3c-19

Why is there not more "Common Areas/Agriculture" acreage under the Reduced Footprint Alternative? Is there a feasible redesign that could preserve more agricultural land? Also, please break down the acreage between "Common Areas" vs "Agriculture".

O3c-20

Table 1 below submitted by Heart of Valley Center displays all of the information provided in the DEIR (with the exception of a one page map provided for some of the Alternatives) for the Project and Alternatives four through six.

O3c-21

O3c-16 The project description of each alternative in Chapter 4.0 explains the roadway improvements included in each alternative. The No Project/ No Development Alternative, No Project/Existing Legal Lot Alternative, General Plan Consistent Alternative and Roadway Design Alternative all avoid roadway design exceptions as they either do not require roadway improvements or they construct any needed roadway improvements to standard. The Reduced Footprint Alternative, Reduced Intensity Alternative, and 2.2C Alternative all construct the portion of West Lilac Road within the site as a standard 2.2C road. All other roadway improvements would require the same roadway design exceptions as the project. The Mountain Ridge Road Fire Station Alternative includes all the roadway exceptions as the project but with a different design exception for Mountain Ridge Road. The FEIR includes a Roadway Design Alternative (FEIR subchapter 4.8) that specifically discusses the impacts that would occur if the road design exceptions are not completed.

O3c-17 The FEIR alternatives analysis describes the magnitude of traffic impacts on the surrounding transportation network by comparing the potential trip generation associated with each of the project alternatives. The number of average daily traffic trips for each Alternative is identified, together with the percentage reduction of traffic trips compared to the proposed project. Based upon Chapter 4.0 of the FEIR, each of the six project alternatives would generate less traffic than the proposed project. Hence, it is fair to conclude that the potential traffic impact associated with the project alternatives would be less than those of the proposed project.

FEIR Chapter 4.0 has been revised to include Table 4-1a, which provides a comparison of trip generation for each alternative. The FEIR includes sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. The discussion need not be exhaustive and at the same level of detail as the project's effects. The courts apply the rule of reasonableness given the limitation of time, energy and funds. Sierra Club v. City of Orange (2008) 163 CA 4th 523, 547. Foundation for San Francisco's Architectural Heritage v City and County of San Francisco (1980) 106 CA 3d 893.

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	<p>O3c-18 It is further noted that the location of the Valley Center Villages would be at greater distances from I-15 and would require an average of 20 additional VMT per trip. With I-15 being the primary vehicle corridor in the project area, compliance with the location chosen in the General Plan for the Valley Center Villages would be anticipated to result in greater GHG emissions.</p> <p>O3c-19 The acreage of manufactured slopes associated with the Reduced Footprint Alternative FEIR Table 4-1 has been revised. The acreage of manufactured slopes has been clarified to reflect 56 acres; the acreage of the biological open space has been clarified to reflect 180.3 acres.</p> <p>The Reduced Intensity Alternative, as described, largely uses the same development footprint as the project, reflecting the physical constraints on the property. The grading is very similar which is reflected in the acreage of manufactured slopes.</p> <p>O3c-20 The intent of the Reduced Footprint Alternative is to lessen impacts to biological resources. The project would not result in any significant impacts to agricultural resources as identified in FEIR subchapter 2.4.2.1. Like the project, this alternative would include 20.2 acres of common areas that could be utilized for on- going agriculture. However, the project would result in potentially significant impacts to biological resources, including upland habitats and wetlands, which require mitigation (refer to FEIR subchapter 2.5.5). Therefore, as required pursuant to CEQA Guidelines Section 15126.6, this alternative was developed in order to reduce a significant impact of the project, while meeting most of the project objectives.</p> <p>O3c-21 Table 1 presented in this comment, is reflective of Table 4-1 that was circulated in the June 2013 EIR. This table was revised in 2014 when the Draft Revised EIR was sent out for public review. As now shown in Table 4-1 in the FEIR, all columns add to a total of 608 acres.</p>
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Table 1 – Limited Information of 3 Alternatives

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

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

sq. ft. = Square
HOA = Homeowner's

The Applicant's information here has multiple math errors (refer to Attachment "D" – Table 4-1 from DEIR Chapter 4 Project Alternatives). Alternatives four and six did not even specify lot locations. These deficiencies need to be corrected.

DEIR Table 4-1 will need to be augmented in a revised DEIR with other significant impact areas, including noise, agriculture, greenhouse gases and fire/public safety. Definitions of each of the land use categories should be provided (for example what is the definition of Commercial/Mixed use?) The table, or a separate table, should compare mitigation measures associated with the various Alternatives.

Similarly, DEIR Table 4-2 is not useful as an analytical and comparative tool because the categories of "Less", "Similar", and "Greater" are too general and qualitatively and quantitatively undefined. How much "Less" and how much "Greater" are appropriate issues to be analyzed.

O3c-21 cont.

O3c-22

O3c-21 (cont.)

Table 4-1 provides a matrix of the proposed land uses for each of the Alternatives. This table is accurate and does not require revision. FEIR Figures 4-3 and 4-4 provide conceptual land use plans, wherein the development footprint is clearly delineated and the areas of development are clearly labeled with land uses proposed under the alternative. As stated in FEIR subchapter 4.7.1, Alternative 6 is simply a hybrid of the project and the Reduced Intensity Alternative. "The 2.2C Alternative combines both Phases 1 and 2 of the Reduced Intensity Alternative with Phases 3, 4, and 5 of the project." Therefore, no additional exhibit is necessary.

The land use categories for the project are defined in FEIR subchapter 1.2.1.3, and are consistent with the County's land use categories as defined in the County General Plan and Zoning Ordinance.

O3c-22 As stated above, an EIR must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. However, the discussion need not be exhaustive and at the same level of detail as the project's effects. The courts apply the rule of reasonableness given the limitation of time, energy, and funds. *Sierra Club v. City of Orange* (2008) 163 CA 4th 523, 547. *Foundation for San Francisco's Architectural Heritage v City and County of San Francisco* (1980) 106 CA 3d 893. The agency need make only an objective, good-faith effort to compare the project with alternatives. The evaluation is limited by what is realistically possible given limitations on time, energy, and funds. *Residents ad Hoc Stadium Comm. V. Board of Trustees* (1979) 89 CA3d 274.

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C. The Project Itself Does Not Meet All of the Objectives

Table 2 below submitted by Heart of Valley Center rates scoring of Alternatives **against the Applicant's biased eight Objectives**. The three variant Alternatives are scored the same as the Project, except for the 2.2C Hybrid Alternate. The 2.2 C Hybrid Alternate includes Senior Housing, so it scores one Objective higher than the other two. The Downtown Escondido Specific Plan is included in this chart for comparison purposes.

TABLE 2 - COMPARISON TO PROJECT OBJECTIVES

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

O3c-23

Clearly, the Downtown Escondido Specific Plan area meets the project objectives better than The Project and the "Alternatives".

O3c-23 Please see response to comment O3c-1. The CEQA Guidelines state that the "range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects" (Section 15126.6[c]). The range of alternatives considered in the FEIR represents a variety of ways in which most project objectives could be met, while environmental impacts could be minimized, such as reducing the number of units, reducing the overall footprint of the project, increasing lot size, and/or rearranging the location of lots. The FEIR need not address every conceivable alternative; rather it must consider a reasonable range of feasible alternatives per CEQA Guidelines Section 15126.6(a).

The FEIR includes Table 4-4 that identifies which project objectives are met by each alternative. It is noted that the FEIR Table 4-4 and the table provided by this comment have different conclusions regarding if the alternatives meet the project objective. The intent of the table included in the FEIR is to determine if the alternative meets the majority of the project objectives, which is four or more of the seven project objectives. Thus, it is not necessary to include the project in the table.

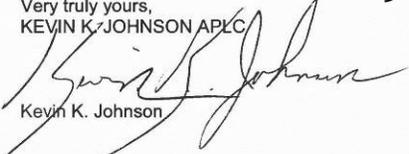
Regardless of if the Downtown Escondido Specific Plan meets the majority of the project objectives, the FEIR includes a reasonable range of alternatives and the Downtown Escondido Specific Plan is not considered a feasible alternative as described in response to comment O3c-5. Refer to response to comment O3c-5 for additional details.

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D. Summary and Conclusion

The Alternatives section must provide information sufficient to allow an informed comparison of the impacts of the project with those of the alternatives. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733. In the absence of analysis of an alternative site and in view of the many identified inadequacies in the alternatives discussion, the DEIR needs to be rewritten and recirculated for public review and comment.

All significant impacts need to be identified and thoroughly analyzed with detailed attention to avoidance and mitigation measures. The project objectives should be revised to avoid obvious bias towards the Project. A new Alternatives Section needs to be developed consistent with actual impacts and the selection of Alternatives that meaningfully avoid or materially reduce the subject impacts. Impact variations under the new Alternatives Section should be detailed and carefully analyzed.

Very truly yours,
KEVIN K. JOHNSON APLC

Kevin K. Johnson

Reference A: Escondido Downtown Interim Specific Plan Area
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Attachment A - DEIR Project Objective Issues letter dated August 16, 2013

Attachment B – Escondido Downtown Interim Specific Plan

Attachment C - "An Alternative Development Scenario for San Diego County" a report dated June 9, 2010, prepared by Larry Orman, Executive Director of GreenInfo Network

Attachment D - Table 4-1 from DEIR Chapter 4 Project Alternatives

cc: Claudia Anzures, Esq.
Mark Mead, Esq.

O3c-24 Please see response to comments O3c-1 to O3c-23 above.

The commenter is correct that CEQA requires recirculation if significant new information is added to the document after public review, per the definitions of "significant new information" in Section 15088.5(a)(1) through (4) as listed in the comment. The County finds that the alternatives analysis is adequate and no new significant information requiring recirculation was added to the FEIR. The FEIR has not been modified in a way that recirculation of the document is necessary.

The project objectives were developed pursuant to CEQA Guidelines Section 15124(b). The Guidelines require that a project description contain a statement of objectives sought by the proposed project and that the statement of objectives should include the underlying purpose of the project.

As stated above, the County finds that the alternatives analysis is adequate, include a reasonable range and each reduces at least one impact of the project.

O3c-25 The attachment is acknowledged and is included in the project's FEIR for the decision makers to consider.

O3c-26 The attachment is acknowledged and is included in the administrative record for the decision makers to consider.

O3c-27 The attachment is acknowledged and is included in the project's FEIR for the decision makers to consider.

O3c-28 The attachment is acknowledged and is included in the project's FEIR for the decision makers to consider.

O3c-29 The attachment is acknowledged and is included in the project's FEIR for the decision makers to consider.

O3c-24

O3c-25

O3c-26

O3c-27

O3c-28

O3c-29

August 16, 2013

To: Mark Slovick, Project Manager
 County of San Diego Planning and Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123
Mark.Slovick@sdcounty.ca.gov
 (858) 495-5172

Subject: DEIR Public Comment to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP), EIR Project Objectives

Dear Mr. Slovick:

The project "objectives" as identified in the DEIR and applied to the specific project site, are inconsistent with the General Plan and the two local Community Plans. In some cases, the "objectives" are meritless and not useful in critically thinking about project "Alternatives". Collectively, the group of selected "objectives" erroneously assumes there is a need for a brand new, independent Town/Village in the middle of a rural community without essential infrastructure. Functionally, the objectives are crafted and used in a biased fashion to select alternatives that are then ruled out by the objectives themselves.

Objective 1 – The full text of Objective One with comment areas highlighted is below:

"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."

Develop a community within northern San Diego County in close proximity to a major transportation corridor – The County General Plan, approved just two years ago, before the LHR project application was moving forward, accommodates more growth than SANDAG population forecasts project. There is no need for the project's proposed housing combinations in the proposed location. There is also no need or requirement to convert land that is designated by the Community Model for agriculture, large animal keeping and estate residential in order to accommodate an additional Village with urban densities in Northern San Diego County.

Importantly, the existing Valley Center Villages (designated by SANDAG as a "Smart Growth Opportunity Area") are in close proximity to and efficiently connected to the I-15 major transportation corridor. Specifically, both the North and South Village nodes are traversed by Valley Center Road which was improved at a cost of \$50 Million to facilitate intensified commercial and residential development of Valley Center's central valley. A traditional crossroads since the late 1800s when Valley Center was homesteaded, the

area has designated in the Community Plan for compact village development since the first community plan in the 1960s. Valley Center Road is a 4 lane road with raised medians, specifically a Circulation Element 4.1A Major Road from Woods Valley Rd south to the city of Escondido, and from Lilac Rd. to Miller Rd. The other segments of Valley Center Road through the North and South Villages are 4.2A Boulevard roads. This slightly lower classification reflects the traffic impacts of interconnection with North and South Village traffic flows.

In stark comparison, the proposed Lilac Hills Ranch Project contemplates overburdening 2.2 E and F two lane, narrow winding country roads to Level of Service E and F and requests **ten Exemptions to County Road Standards** on the circulation roads that the project will utilize. The Project proposes adding 22,000 plus Average Daily Trips required by this automobile based commuter community.

Functionally, the Project is not "in close proximity" to the I-15 freeway. Reality is that the granite hills require a twisting, slow 1 ½ mile trip to I-15 south and 3 miles north to I-15 North, from the closest northern point of their development.

From the south at Circle R Drive it is 3.0 miles of the lowest grade of public road in the County to reach I-15 at Gopher Canyon.

Importantly, the project applicant itself (and their self-serving "objectives") does not have legal right-of-way to use Mountain Ridge and Covey Lane private roads for the Project. It also does not own legal right of way, nor can it require legal right-of-way without the use of Eminent Domain, to build the proposed Covey Lane/West Lilac Road intersection in compliance with minimum County Sight Distance Line standards.

From a full disclosure standpoint, it is misleading to tell the public that the project is in "close proximity" to a major transportation corridor without an analysis of the ability of this Project to mitigate impacts, to safely manage its traffic burden and to pay for the direct off-site impacts of the Project's congestive Level E and F Level of Service.

In contrast, the "Smart Growth" vision and guiding principles that are essential foundations for the entire County General Plan, has led to planned growth being re-directed to enlarged Village areas where road and sewer infrastructure is in place. Conversely, the new General Plan directs growth away from the more rural countryside.

The General Plan growth in housing units across the entire County of San Diego is summarized in Table 1-1 below.

Table 1-1 San Diego County General Plan Housing Unit Forecast 2010-2050

CPA	Housing Units				Percent Change			
	2010	2020	2030	2050	2010-2020	2020-2030	2030-2050	2010-50
Alpine	6,535	6,690	7,875	9,157	2.4%	17.7%	16.3%	40.1%
Barona	202	170	170	170	-15.8%	0.0%	0.0%	-15.8%
Bonsall	3,875	4,320	5,149	6,451	11.5%	19.2%	19.6%	59.7%
Central Mountain	2,182	2,305	2,589	2,735	5.6%	12.3%	5.6%	25.3%
County Islands	614	607	607	635	-1.1%	0.0%	4.6%	3.4%
Crest-Dehesa	3,562	3,677	3,926	3,978	3.2%	6.8%	1.3%	11.7%
Desert	3,546	3,453	4,337	6,923	-2.6%	25.6%	59.6%	95.2%
Fallbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jamul-Dulzura	3,234	3,372	4,398	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.8%	7.0%	17.8%
Lakeside	27,575	28,517	30,339	30,915	3.4%	6.4%	1.9%	12.1%
Mountain Empire	3,023	3,056	3,903	5,108	1.1%	27.7%	30.9%	69.0%
North County								
Metro	16,114	19,548	24,090	25,946	21.3%	23.2%	7.7%	61.0%
North Mountain	1,527	1,759	2,002	2,388	15.2%	13.8%	19.3%	56.4%
Otay	7	490	2,035	2,156	6900.0%	315.3%	5.9%	30700.0%
Pala-Pauma	1,980	2,285	3,037	4,399	15.4%	32.9%	44.8%	122.2%
Pendleton-De Luz	7,531	8,533	8,684	8,797	13.3%	1.8%	1.3%	16.8%
Rainbow	708	750	881	953	5.9%	17.5%	9.3%	36.0%
Ramona	12,376	12,692	14,107	15,140	2.6%	11.1%	7.3%	22.3%
San Diego	10,993	11,053	11,924	13,601	0.5%	7.9%	14.1%	23.7%
Spring Valley	20,533	20,939	21,837	21,952	2.0%	4.3%	0.5%	6.9%
Sweetwater	4,670	4,657	4,732	4,732	-0.3%	1.6%	0.0%	1.3%
Valle De Oro	15,543	15,648	16,022	15,968	0.7%	2.4%	-0.3%	2.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	36.9%	102.0%
Unincorporated Area	170,608	180,431	202,882	222,890	5.8%	12.4%	9.9%	30.6%
San Diego County	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

Please note that the Lilac Hills Ranch project requires General Plan Amendment, and is not included in the estimate of projected Housing Units in Table 1-1, which is based on the August 2011 San Diego County General Plan.

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

Valley Center Housing Units as reflected in the August 2011 General Plan are growing 102% from 2010 to 2050, **more than 3 times** the rate of the County overall. This growth is largely in the North and South Villages, which are located where suitable infrastructure is (Roads, Sewers, Schools) located in Valley Center. There are no provisions in the General Plan to provide the requisite infrastructure in the remote proposed site of Lilac Hills Ranch to support urban village land use densities. The two central Villages in the San Diego County General Plan and the Valley Center

Community Plan located in the traditional town center is the logical place for Valley Center to provide more than its fair share of housing for the County.

Bonsall Housing Units as reflected in the August 2011 General Plan are growing 59% from 2010 to 2050, **nearly 2 times** the rate of the County overall. Growth is also planned at the traditional town center, close to the intersection of SR-76 and Mission Road, where necessary infrastructure for dense, urban development is in either on the ground or planned (and funded) to be added shortly.

The combined composite effects of adding Lilac Hills Ranch in addition to General Plan growth is provided in Table 1-2 below:

Table 1-2 Bonsall and Valley Center Composite Housing Unit Analysis

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

The ONLY mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389 (Attachment A). The closest access is at SR 76 and Old Highway 395, a minimum 4 mile trip north from the project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido Transit Center. If you are going to a regional shopping center or work center, you must take a 30 minute bus ride to the Escondido Transit Center and transfer to another route.

The mass transit system only works if you are a Casino patron.

consistent with the County's Community Development Model – This Project is not consistent with the San Diego County Community Development Model. **It is Inconsistent with the Community Development Model which is a subset of the San Diego General Plan.**

The General Plan states (San Diego County General Plan: Land Use Framework; Community Development Model, p.3-6): *"The Community Development Model directs the highest intensities and greatest mix of new uses to Village areas, while directing lower-intensity uses such as estate-style residential lots and agricultural and agricultural operations to Semi-Rural areas To facilitate a regional perspective the Regional Categories of Village, Semi-Rural and Rural Lands have been applied to all privately-owned lands ..."*

Clearly, the Community Development Model is not a moveable, abstract concept. If this were true then Village "puzzle pieces" could be dropped into Semi-Rural and Rural lands anywhere in the County and pronounced consistent with the Community Development Model.

Rather, the Community Development Model reflects a complex of planning principles and ideas that are expressed through the General Plan's Regional Categories. It is the assignment of a particular Regional Land Use Category to a particular piece of land that this SP/GPA proposes to amend. The proposal therefore is inconsistent with the Community Development Model. Again, consistency would be achieved only by amending the General Plan to fit the project.

- In the General Plan (p 3-7) *"Village areas function as the center of community planning areas and contain the highest population and development densities. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit."*
- The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This proposal to plo a Village into the middle of an area that the Community Development Model designates for Semi-Rural and Rural development requires AMENDING the Community Development Model.
- Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model, which has been applied in Valley Center's central valley and which this proposal defies, requires a "feathering" of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth.
- This SP/GPA is located many miles from areas that the Community Development Model designates for Village development: miles from employment centers, shopping, entertainment, medical services, and civic organizations and activities.
- As for infrastructure, there are few existing roads in the area and they are built and planned to service Semi-Rural and Rural development, as is the current plan. Despite proposing intense Village development, the proponents also propose to retain or reduce capacities of these roads. Additionally, Accretive does not have legal rights to use Covey Lane and Mountain Ridge Private Roads for the purposes

indicated in the LHR Specific Plan and supporting plans and documents. Water infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service.

- The intent of the Community Development Model for Villages is to intensify development in existing Villages -- not to create NEW Villages through the destruction of Semi-Rural and Rural lands. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed use core to meet the Semi-Rural designations. The majority of the Valley Center community's future development is now planned for the "Village" areas in the center of the Valley Center Planning Area, at the community's traditional "crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place.

a walkable pedestrian-oriented mixed-use community. There are two issues with this part of Objective 1. The first issue is that the Specific Plan is so NON-SPECIFIC on what the Commercial, Schools, and Parks content of this Project is that **one cannot assess whether anyone walking would reach a desired service of any kind.**

The second issue is that "walkability" is usually defined a ½ mile one way trip. The large majority of the Commercial zoning is in the Northern town center, which is a 1 ½ mile one way trip from the Southern boundary of the Project. People in the South (1 ½ mile) and Middle (1 mile) of this project won't walk to the town center, and the two small commercial areas planted in the Middle and South to create a façade of "a walkable pedestrian community" are not credible walkable destinations. In fact, this creates Urban Sprawl internal to the Lilac Hills Ranch Subdivision.

2.

Objective 2 – The full text with comment areas highlighted is below:

"Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area."

in a manner that encourages walking and riding bikes - With 10 Exceptions to Road Standards, the Covey Lane/West Lilac intersection with its Sight Distance line that does not meet County Road Standards, and the traffic load the Project will throw on internal and external roads, **who is gonna risk taking a walk or riding a bike?**

public services and facilities that are accessible to residents of both the community and the surrounding area – There are two issues with this statement.

The first issue: what **are** the public services and facilities in this Project? A vague statement about a K-8 school site without any commitment to financing or endorsement

by the School District, a vague description of the minimum acreage of Parks the County requires? Does the undefined Commercial content include a Supermarket or community market? A restaurant of any kind? A retail gasoline service station?

The second issue: "accessible to residents of both the community and the surrounding area" – Accretive's Traffic Impact Study does not show an influx of non-residents to the area. **Is this because the Applicant is overly optimistically portraying the true Traffic Impact of this Project?**

3.

Objective 3 – The full text is below:

"Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers."

There is no demonstrated need for these recreational amenities in the rural environment that exists on and around the project site. Further, the DEIR does not even attempt to address the issue of adding to or upgrading recreational facilities in other areas in Valley Center, including in and around the existing Villages..

4.

Objective 4 - The full text with comment areas highlighted is below:

"Integrate major physical features into the project design, including major drainages, and woodlands **creating a hydrologically sensitive community in order to reduce urban runoff.**"

There are three issues with this Objective. The first issue is that the Objective is **so vague and subjective that compliance is not measurable.**

The second issue is with the highlighted statement: **"Integrate major physical features into the project design, including major drainages, and woodlands"**

How is taking 608 acres of Rural Land primarily involved in Agriculture, disturbing 440 acres, and creating large areas of impermeable surfaces consistent with this Objective? The Project includes 83 acres of road surface and 68 acres of manufactured slopes. Is it desirable to increase storm water runoff surface water velocity in concrete channels that increase downstream siltation in the runoff? How does this benefit the woodlands?

The third issue is with the highlighted statement that follows: **"creating a hydrologically sensitive community in order to reduce urban runoff."**

From our analysis of the Accretive Hydromodification Design, we find the analysis is marginal; requiring rainwater collection and storage from rooftops and a total of 23

acres of permeable paving to meet Hydrology requirements with the indicated preliminary design. The truth of the matter is that Accretive is proposing covering large areas of rural farm land with impermeable surfaces. If the Hydro design is compliant, it achieves compliance only in the most optimistic scenarios with scant margin. **Is this what a hydrologically sensitive community is?**

5.

Objective 5 – The full text is below:

“Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.”

The project as proposed will still destroy sensitive natural resources. The fact that it will preserve some resources on site is not a reason to fail to look at an alternative that will save all the resources on site. If the DEIR is fairly going to use this “Objective” to select and discount project alternatives, it needs to specifically analyze the differences in conservation outcomes amongst and between the project alternatives. Further, the DEIR must include a thoughtful analysis of alternative sites for all or part of the project.

6.

Objective 6 – The full text with comment areas highlighted is below:

“Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.”

The mixed-use and senior housing are included in the Project to achieve the densest possible development yield. The Applicant has added a 200 bed congregate care facility on top of the 1746 Equivalent Dwelling Units, stating that because there is only one communal kitchen, the huge facility technically doesn’t add EDU’s.

The Applicant in truth has located its “Senior Housing” in Phase 4 and 5 to “spin” the myth that the proposed LHR Project has acceptable Traffic Impacts. Senior dwelling units have the lowest Trip Generation rates for Traffic Impact assessment.

Accretive has limited rights for Covey Lane and Mountain Ridge private roads, which are the required Fire Access exits for Phase 4 and 5. Accretive is “spinning” a second myth that the senior community land uses do not overburden their limited easement rights for private roads.

The reality is that a Senior Community placed in the proposed Lilac Hills Ranch remote location far from Medical Services and shopping will create a larger traffic burden than the SANDAG Trip Generation Tables indicate. This is because the trip generation for SANDAG Senior Residences is based on San Diego County statistical facts. And factually, the majority of Senior Residential Communities are sited in areas where necessary infrastructure and services are in close proximity. Lilac Hills Ranch lacks

necessary infrastructure and services and will require longer and more frequent trips for Senior residents to acquire necessary services.

The jumbled aggregation of “senior oriented” land uses aren’t properly thought out from an available Community Services standpoint – it is an attempt (that fails) to Design around deficient legal rights-of-way for roads.

In this Objective, **the County re-brands dense Urban Sprawl as a desired attribute.**

7.

Objective 7 – The full text is below:

“Provide the opportunity for residents to increase the recycling of waste.”

Having an on-site recycling facility is not the only opportunity to increase recycling of waste.

The General Plan density Community could and should partner with the County to provide local centralized brush chipping. The mulch generated has the benefit of reducing landfill usage or lowering Greenhouse gases by avoiding burning the brush, creates mulch that improves plant growth while lowering water consumption, and the brush clearance lowers fire risks. This is a single example of how any of the alternatives provide opportunities for residents to recycle waste.

Fairly considered, all of the Alternatives comply with this Objective equally.

8.

Objective 8 – The full text is below:

“Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.”

This objective, unless fairly treated as achievable at alternative locations in the Valley Center Community or in the surrounding North County communities, serves only as a preconceived basis to reject project alternatives that are anything less than the full project on the specific project site.

Further, the DEIR should look at how developing a Project at the proposed General Plan densities and preserving existing agriculture and residential based businesses (such as the existing Accretive Agricultural Office located on 32444 Birdsong Drive) on the same or nearby parcels could achieve Objective 8 perhaps better than the proposed project.

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RESPONSE

Summary

The proposed LHR Project meets very few of its own Objectives and the Objectives are used in the DEIR as tools to limit the range of Alternatives discussed and to reject Alternatives that are consistent with the General Plan. The "Objectives" for the project should be adjusted with the primary goal of building a project consistent with the County's new General Plan.

Sincerely,

Mark Jackson
9550 Covey Lane
Escondido, CA 92026
760-731-7327
jacksonmark92026@gmail.com

Attachment A: North County Transit District Breeze Bus Routes 388 and 389



An Alternative Development Scenario for San Diego County

A Report Prepared on Behalf of the Cleveland National Forest Foundation

Prepared by Larry Orman, Executive Director

June 9, 2010

Contents

1. Introduction
 2. Key Information Elements
 3. Alternative County Growth Scenario
 4. Visualizing Residential Development
- Maps: Allocation from County; Capacity of Cities
Appendices

GreenInfo Network - 564 Market St. Suite 510 San Francisco CA 94104 - www.greeninfo.org

LETTER

RESPONSE

Summary

In order to protect natural systems and rural landscapes, as well as to ensure urban growth occurs primarily in incorporated areas, it is reasonable for the County of San Diego to consider a growth alternative in its General Plan process that reduces by approximately two-thirds the number of housing units current proposed for unincorporated areas and to re-allocate these units to cities within the County. Such a scenario would, by 2030, still leave substantial residential capacity in cities for future growth needs.

1. INTRODUCTION

The purpose of this project is to provide an assessment of whether it is reasonable to shift significant anticipated growth from unincorporated areas of San Diego County into existing cities in the County, in order to lessen pressure on important natural resources, reduce sprawl and foster compact and more sustainable development. This memorandum outlines the findings of this assessment.

The San Diego County proposed General Plan Update has been used, in consultation with CNFF, to determine what growth might be redirected. Data from the San Diego Association of Governments (SANDAG), has been used to assess the feasibility of allocating that increment of growth to existing cities.

GreenInfo Network is a non-profit organization founded in 1996 to support other public interest organizations and public agencies with computer mapping and related information technology. Using Geographic Information Systems (GIS) software and other tools, GreenInfo Network aides approximately 80 groups a year on a wide range of projects, covering environmental protection, land use, social justice, public health and other matters. With its twelve professional staff, GreenInfo Network has assisted over 300 organizations and agencies since its founding.

GreenInfo Network has background in the issues described in this report, including extensive work on a recent infill model for the San Francisco Bay Area and the expertise of its Executive Director, Larry Orman, who has considerable experience in local and regional land use planning.

2. KEY INFORMATION ELEMENTS

San Diego County is fortunate to have a large amount of very competent geographic and demographic data to support land use planning. In particular, SANDAG, uses extremely robust GIS data and growth modeling that allow very effective review and assessment of the type conducted for this project. Their data and other sources used include the following:

1. San Diego County Draft General Plan Update: The draft plan provided the numbers of people and dwelling units proposed for each unincorporated community, or planning area, in the County. Cleveland National Forest Foundation (CNFF) has determined that approximately 66 percent of this growth can be redirected to cities from these unincorporated areas, ensuring that substantial gains would be possible in resource protection, sprawl avoidance and urban sustainability. See Appendix 1, CNFF memorandum dated May 27, 2010.

2. SANDAG Population projections: SANDAG maintains population projections for the entire County. Its most recently adopted version is its 2050 series (February 2010), which was used in determining future projected growth in incorporated areas. An explicit reference to the primary data table used is noted in the Appendix title page at the end of this report. Information and data about the 2050 projections is available thru the SANDAG web site:

<http://www.sandag.org/index.asp?projectId=355&fuseaction=projects.detail>

It should be noted that SANDAG's 2050 projection series and the County's projections differ somewhat by 2030, with SANDAG showing slightly more growth in the unincorporated area. The County General Plan EIR suggests that the SANDAG 2050 series will be closer to the County's estimate (the SANDAG 2050 projections were published mid-way through the development of this report). However, in this project, we use the County data to define the units to be allocated from the unincorporated areas, and SANDAG for the city data, to better match any data on unincorporated areas to what the County itself is using.

3. Residential Land Inventory: The third major source of data used in this assessment was the SANDAG Employment and Residential Land Inventory ("Inventory"), published in September 2009. This Inventory is attached to this report as Appendix 3. This extensive SANDAG project assessed the residential and employment capacity of every parcel ownership in the County, using existing City general plans as the primary factor to determine what each parcel might be capable of holding in the future. Our report relies upon the Inventory's residential capacity data and does not assume any changes in use of land for employment purposes.

The SANDAG Inventory looks only at parcel-based site capacity. Issues of infrastructure, traffic and other factors were not assessed in great detail. However, since the Inventory uses adopted general plans as a key element in defining capacity, it can be reasonably assumed that such constraints and factors have effectively been taken into account.

The Inventory has two major information elements: (a) an estimation of capacity without regard to time frame; and (b) a stratification of that capacity into short, intermediate and longer

term categories based on market timing and related factors. This report does not assess the timing of the growth allocated from the unincorporated areas to the cities (in part because the amount allocated to each city ended up being a relatively small percent of its overall capacity).

The Inventory is extremely detailed and has been extensively reviewed by a multi-interest task force and through map and data review with every city. Most of the future residential capacity the Inventory defines was based on existing City general plans with some adjustments that were agreeable to the cities (information in this paragraph confirmed in phone call with Marney Cox, SANDAG on 2/9/10; see also Page 50 of the Inventory which notes this involvement by local jurisdictions. It is also worth noting that the Employment and Residential Inventory Report was developed by a broadly representative project task force of 37 people from government and the private sector, among them representatives of 13 of the county's 17 cities).

The Inventory was being developed at the same time new projections ("Series 12", the 2050 projections) were being prepared. Because of the many variables involved in both efforts, the Inventory report underscores that its capacity estimates are just that – estimates, and at a particular point in time. The Inventory report also cautions against comparisons of the forecast and the Inventory (page 55), given that different factors are used in each set of numbers. However, the Inventory remains a highly researched data set and is indeed the only resource for any assessment of development capacity in relation to future demands from population growth and change. It is for this reason that the Inventory estimates of future capacity are used in this report to show the approximate scale of how much residential capacity might remain at different growth projections or allocations.

While the Inventory suggests a great deal of capacity for reuse of existing developed areas along with some new, higher densities on vacant land, history shows that many plan-defined densities end up being somewhat reduced when projects are actually built. However, it is also the case that communities generally, and many in San Diego in specific, have been significantly increasing the amount of residential development allowed in many areas in the past few years and it is likely, according to SANDAG staff, that some cities may adopt new plans that allow for even more capacity than indicated in the Inventory.¹

Finally, it is worth noting that the Inventory report (page 1-2) itself emphasizes the goal of channeling much of the region's future growth into existing incorporated areas:

The RCP [Regional Comprehensive Plan by SANDAG] contains a long-term vision for the San Diego region, expressed in a malleable framework in which local and regional decisions will be made over time to improve our quality of life. To achieve this goal, the RCP is based on the premise of change; we must plan for our future differently than we have our past for the reasons listed in the elements of the RCP. For example, the vision is to create an urban form comprised of sustainable and balanced communities with a high quality of life.

To help achieve the vision's goals, local jurisdictions, acting together as SANDAG, have endorsed an urban form that channels much of the region's future growth into existing urban (primarily incorporated) communities, preserving and protecting the lifestyle and sensitive environment of our rural (primarily unincorporated) areas. One outcome of this change would be that an increasing

¹ Chula Vista, Oceanside and Vista are a few of the cities that are taking actions to create livable transit oriented communities.

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proportion of our growth will likely occur as redevelopment and urban infill. Thus, the data in this report provides a unique snapshot as well as insight into how prepared the region is today to accommodate the RCP vision of a new urban form.

In addition to this data and these analyses, GreenInfo Network made use of a number of other SANDAG GIS data sets, including the parcel layer, transportation system, community planning area boundaries and others. This data was used for visual display and review; no spatial analysis was performed.

Finally, as part of the project, GreenInfo Network reviewed SANDAG meeting agendas and minutes relating to the San Diego County General Plan Update, the Employment and Residential Land Inventory project, and related information posted on the SANDAG web site.

3. ALTERNATIVE COUNTY GROWTH SCENARIO

Is it reasonable to consider redirecting into cities two-thirds of housing unit growth projected for the unincorporated areas?

This is the key question that this report seeks to answer.

The method used in testing whether this growth scenario is reasonable consisted of the following steps:

1. Identify the residential units to be allocated AWAY from each unincorporated planning area (66% of the proposed number of residential units in the County General Plan Preferred Alternative). This calculation was prepared by CNFF; the methodology and assumptions are described in Appendix 1. *Map 1 shows the location of units to be reallocated to cities.*
2. Identify the 2030 projected NEW residential units for all cities (incorporated areas) from the SANDAG 2050 projections (2030 appears to best correlate with the time horizon of the County's draft General Plan).
3. ASSIGN the units in (1) to each city, proportionate to each city's percent of the total unit capacity as identified in the 2009 Residential and Employment Inventory. Note: this capacity is not time dependent; it is simply the total number of units that could be built under the planning and other conditions operative at the time of the Inventory (2008-09).
3. ADD the 2030 city projections and the assigned units to arrive at each city's total 2030 residential unit allotment.
3. SUBTRACT the 2030 total units from each city's CAPACITY, as defined in the Inventory.
4. Review the REMAINING Inventory capacity for each city, to determine: (a) the share of total unit capacity represented by the allocation of units from county planning areas; and (b) the remaining capacity after this allocation. *See Map 2 which identifies these capacities.*

CONCLUSION: Applying these steps, as indicated in the three tables that follow, shows that almost all cities* in San Diego County have substantially more residential capacity than demand by 2030, even with the additional allocation of units from the County. Removing 47,500 units from the County and redirecting them to cities still leaves the cities of the County with 158,000 units of residential capacity for future growth beyond 2030.

This strongly indicates that a scenario using this approach would be entirely reasonable in the County's process of developing its general plan. See Map 2, later, which illustrates this conclusion.

**The City of Del Mar is an exception, with no units assigned, due to its very small unit capacity.*

RE-ALLOCATION RESIDENTIAL UNITS PROPOSED IN DRAFT COUNTY GENERAL PLAN FROM COUNTY UNINCORPORATED AREAS

PLANNING AREA	Draft-GP 2008 Pop	Draft-GP 2008 DU	Draft-GP Buildout* Pop	Draft-GP Buildout* DU	Draft-GP Pop Increase	Draft-GP DU Increase	New Pop Increase	New DU Increase	Alloc. of DU to Cities
Alpha	17,350	6,444	27,500	10,070	10,150	3,625	2,470	1,389	2,277
Beta	9,800	2,607	15,340	5,817	5,540	2,860	1,978	767	1,213
Central Mountain	4,545	2,127	6,100	2,659	1,554	742	465	213	529
County of Santa	2,698	519	2,500	742	402	129	402	129	0
Crater-Goshute	10,211	2,500	11,200	4,071	1,179	541	1,021	259	160
Desert	2,520	2,140	17,800	12,777	14,270	9,227	252	214	6,022
El Dorado	44,376	12,025	61,000	21,211	16,722	5,245	8,475	2,129	2,412
Forest-Columbia	2,915	2,167	17,000	2,711	7,785	2,244	892	217	445
Golden	2,049	1,595	2,200	2,200	1,221	614	205	159	0
Highlands	75,447	27,411	85,720	31,291	11,275	2,880	11,275	2,880	2,147
Mountain-Crest	6,472	2,694	14,720	6,110	8,248	2,415	547	259	3,126
North County Metro	42,629	15,970	62,000	22,160	29,441	12,190	16,950	2,999	2,270
North Mountain	2,415	1,515	7,110	2,495	4,694	2,421	342	152	2,240
Other	4,500	5	14,700	2,246	10,200	2,240	459	1	2,201
Petaluma	2,516	1,040	12,000	4,395	7,512	2,295	552	194	160
Redwood-Clear	42,792	6,957	26,150	7,009	(7,620)	365	(9,410)	160	479
Sierra	1,815	660	2,540	1,299	1,625	515	359	127	2,809
Sierra	26,752	11,997	32,500	16,205	16,747	6,208	7,251	2,299	0
San Diego	20,469	10,654	29,470	12,246	2,961	1,724	2,961	1,724	0
Spring Valley	62,377	20,512	65,000	21,653	4,623	1,441	4,612	1,441	0
Summit	12,167	4,519	15,400	5,275	2,249	725	2,249	725	0
Yuba-Clear	42,740	15,477	46,110	16,225	2,367	726	2,367	726	0
Yuba Center	14,269	6,512	29,200	12,777	21,931	7,664	2,924	1,202	5,761
TOTAL UNINCORP'D	494,764	166,972	678,270	238,252	186,206	71,541	61,227	29,876	47,625

Sources: San Diego County Draft General Plan, Exhibit 6, page 4-13-14, 12-2-20, 21. Growth of physical development, "Cell 7".
 *The County General Plan does not intend to require all of the proposed "Buildout" to occur in the specified jurisdiction.

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CITY POPULATION AND GROWING UNIT PROJECTIONS, 2008 and 2030 (from SANDAG 2030 Projections)

CITY	2008 POP	2008 DU	2030 POP	2030 DU	INCREASE, 2008-2030	
					Pop Inc 2030	DU Inc 2030
Carlsbad	143,499	43,499	123,231	40,231	21,445	6,232
Chula Vista	230,297	77,494	280,044	94,298	38,647	17,374
Coronado	23,030	9,540	26,203	9,677	3,793	94
Del Mar	4,541	2,532	4,914	2,696	352	71
Escondido	97,222	32,194	128,447	42,123	39,022	9,227
Indio	63,615	24,202	73,022	27,202	9,437	3,077
Imperial Beach	143,229	47,322	145,247	47,729	22,628	5,326
La Mesa	29,032	9,231	30,174	10,149	2,482	629
Lemon Grove	39,445	25,010	45,934	28,144	9,239	3,025
National City	22,511	8,220	28,171	9,221	2,660	241
Oceanside	36,144	12,773	49,396	33,244	13,142	3,021
Poway	170,102	64,426	202,602	73,422	31,500	8,669
Riverside	50,744	16,313	57,221	18,221	7,227	1,908
San Diego	1,233,617	398,436	1,629,224	429,412	322,637	121,030
San Marcos	82,410	27,526	101,228	33,022	13,229	5,229
Santee	52,220	19,220	69,220	23,220	14,020	4,220
Salinas Beach	13,447	6,220	14,224	6,224	1,477	340
Vista	92,493	30,220	102,022	32,022	9,622	1,822
TOTAL for CITIES	2,641,594	973,772	3,253,171	1,346,925	488,915	122,225
Unincorporated	489,924	266,822	626,822	202,822	129,271	36,000
TOTAL ALL	3,131,518	1,240,594	3,880,000	1,549,747	618,186	158,225

Source: SANDAG, 2030 projections

ALLOCATION OF UNINCORPORATED GROWTH INCREMENT TO CITIES

CITY	2008-2030 Add. OUs Projected	TOTAL OUs CAPACITY From Inventory*	SURPLUS OUs Capacity	% of Add'l OUs From Capacity Add'l	OUs From Inventory to OUs to OUs	% of OUs Capacity to OUs to OUs	Remaining OUs	Remaining OUs Capacity
Carroll	6,355	8,234	2,879	29%	1,902	28%	1,777	62%
Clay Vista	17,374	43,400	26,026	22%	5,281	20%	20,855	80%
Covington	84	783	689	0%	83	13%	596	87%
De Witt**	73	56	(17)	0%	-	0%	(17)	100%
El Cajon	8,527	11,008	2,591	29%	1,902	73%	408	27%
Escondido	3,077	3,665	578	23%	436	75%	142	25%
Escondido	5,286	14,337	8,951	49%	1,713	19%	7,240	81%
Escondido Beach	638	3,828	3,188	23%	457	14%	2,732	86%
La Mesa	3,085	5,650	2,565	23%	674	26%	1,891	74%
Lennox Growth	563	2,220	1,658	23%	265	16%	1,394	84%
Marina City	3,001	8,103	5,072	26%	867	17%	4,105	81%
Menlo Park	8,968	12,438	3,468	29%	1,484	43%	1,885	57%
Poway	1,808	3,041	1,233	23%	362	32%	770	68%
San Diego	121,038	252,855	131,816	63%	30,388	23%	90,417	77%
San Marcos	5,538	11,510	5,973	29%	1,374	23%	4,597	77%
San Marcos	4,260	6,738	2,478	29%	804	32%	1,674	68%
San Marcos Beach	360	458	98	0%	55	56%	43	44%
Vista	1,838	10,043	8,205	29%	1,385	15%	6,896	85%
TOTAL for CITIES	385,352	1,089,283	706,240	300%	171,667	23%	558,573	77%

Source: SANDAG 2030 pop. pr. 45, Imply. & An Land Inventory 2013 (Pre-Adopt calculation). **Not later than the capacity than SANDAG projection.

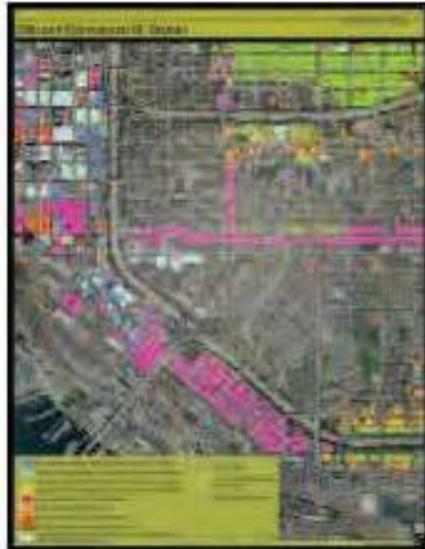
4. VISUALIZING DEVELOPMENT CALLED FOR INFILL SCENARIO

The SANDAG Employment and Residential Inventory defines many types of residential growth in existing capacity. The following table of five general residential types that applied to the cities of San Diego in this assessment:

- Infill development of some single family and multi-family units
- Redevelopment, conversion of some single family units to multi-family units
- Conversion of former mobile home parks to single family or multi-family unit development
- Conversion of former employment sites to residential or mixed uses
- Development of vacant land – single family, multi-family or mixed use development on “greenfield” sites that are currently undeveloped

These types of residential development are all common in San Diego and most California metropolitan areas, where urban housing is being built at a rapid rate.

The Alternative Growth Scenario outlined in this report by the most of the SANDAG Regional Comprehensive Plan, based on these types of housing growth and identified fully in the Employment and Residential Inventory report. The adjacent figure, titled 25th and Commercial Street Station, provides a visual representation of this type of infill development. This graphic shows the particular parcels and their residential capacities, around a potential transit station just west of downtown San Diego.



The simulation presented on the following page provides an example of how a typical suburban corridor could be redeveloped with urban scale housing and retail/commercial uses. These simulations are ideally used to help policy makers and decision makers evaluate the great transit problems that can turn currently desolate areas into vibrant urban places.

4. VISUALIZING DEVELOPMENT CALLED FOR INFILL SCENARIO

The SANDAG Employment and Residential Inventory defines many types of residential growth in existing capacity. The following is a list of five general residential types that applied to the cities of San Diego in this assessment:

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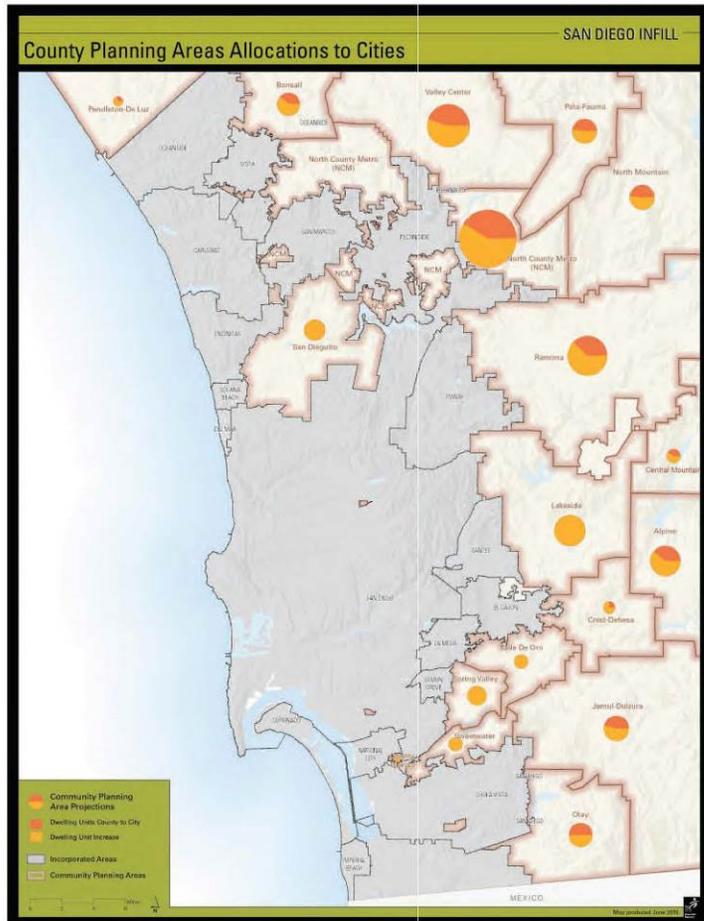
These types of residential development are all common in San Diego and most California metropolitan areas, where urban housing is being built at rising densities.

The Alternative Growth Scenario outlined in this report is, like most of the SANDAG Regional Comprehensive Plan, based on these types of housing growth and alluded more fully in the Employment and Residential Inventory report. The adjacent figure, entitled 25th and Commercial Street Station, provides a visual representation of this type of infill development. This graphic shows the particular parcels and their residential capacities, around a potential transit station just west of downtown San Diego.

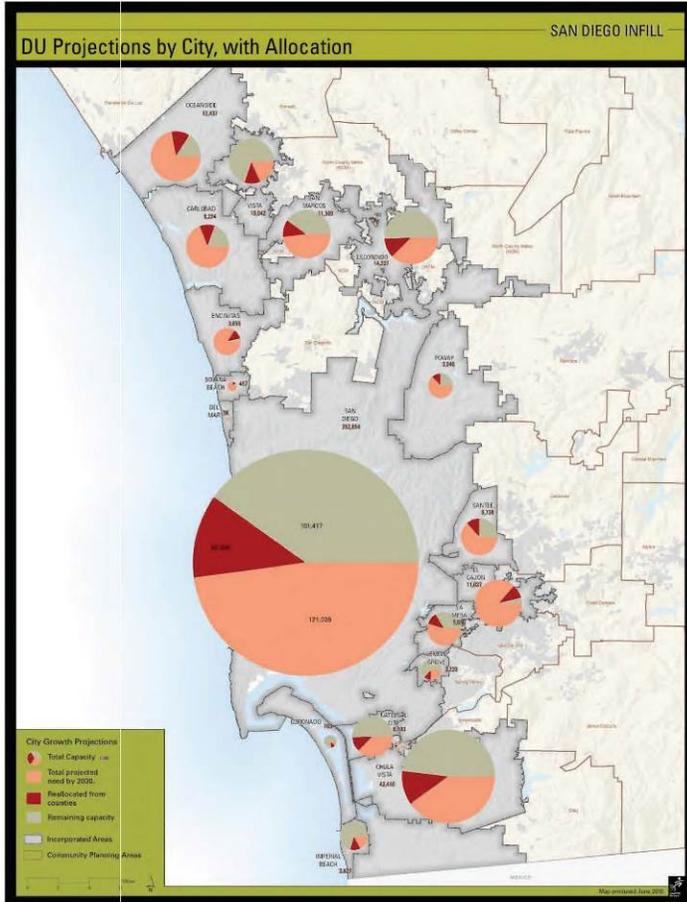


The simulation presented on the following page provides an example of how a typical suburban corridor could be redeveloped with urban scale housing and retail/commercial uses. These simulations are widely used to help policy makers and developers evaluate the great transportation that can turn currently desolate areas into vibrant urban places.

MAP 1 – Dwelling Units in County Planning Areas - Allocated to cities, retained as County projection



MAP 2 – Dwelling Unit Capacities in Cities (showing allocations from County planning areas)



APPENDICES TO REPORT

Appendix 1:

Method for Re-Allocation of County Residential Units

Prepared by Duncan McFetridge and Crystal Mohr on behalf of the Cleveland National Forest Foundation
May 27, 2010

Appendix 2: (Excel table not included, available for public download as noted)

SANDAG 2050 Growth Projections

Excel data tables from the 2050 projections – available from: <http://datawarehouse.sandag.org/>
Primary table used: **Cities and the Unincorporated Area.xls**
Prepared by SANDAG staff
February 2010

Appendix 3:

2009 Employment and Residential Land Inventory and Market Analysis

SANDAG
September 30, 2009

APPENDICES

Attachment D – Table 4-1 from DEIR Chapter 4 Project Alternates

TABLE 4-1
LILAC HILLS RANCH CEQA ALTERNATIVES

Land Use	Project			Alternative														
	No Project - No Development			2			3			4			5			6		
	Gross Area Sq. Ft.	Units/Single-Family	Units/Total	Gross Area Sq. Ft.	Units/Single-Family	Units/Total	Gross Area Sq. Ft.	Units/Single-Family	Units/Total	Gross Area Sq. Ft.	Units/Single-Family	Units/Total	Gross Area Sq. Ft.	Units/Single-Family	Units/Total	Gross Area Sq. Ft.	Units/Single-Family	Units/Total
Single-family Detached	153.8	803	16	603.8	49	0	351.4	110	0	142	753	275.5	851	177	752	0	0	0
Single-family Senior	75.9	468	0	0	0	0	0	0	71.1	468	0	0	0	0	0	0	0	0
Single-family Attached	7.9	164	0	0	0	0	0	0	6	105	0	0	0	0	0	0	0	0
Commercial/Mixed-Use	15.3	211	0	0	0	0	0	0	2.4	0	0	0	0	0	0	0	0	0
Water Reclamation	2.4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RFI/Traffichead	0.6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Detention Basin	9.4	0	0	0	0	0	0	0	5.4	0	0	0	0	0	0	0	0	0
School Site	12.0	0	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0
Private Recreation	2.0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Group Residential/Care	6.5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Institutional	10.7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Park - HOA	11.8	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0
Park - Dedicated to County	12.0	0	0	0	0	0	0	0	168.8	0	0	0	0	0	0	0	0	0
Biological Open Space	40.0	0	0	0	0	0	25.6	0	0	0	0	0	0	0	0	0	0	0
Biological Open Space	45.9	0	0	0	0	0	0	0	35.7	0	0	0	0	0	0	0	0	0
Circulating Road	37.6	0	0	0	0	0	0	0	37.6	0	0	0	0	0	0	0	0	0
Common Areas/Agriculture	20.2	0	0	0	0	0	0	0	30.2	0	0	0	0	0	0	0	0	0
Manufactured Slopes	67.5	0	0	0	0	0	0	0	67.5	0	0	0	0	0	0	0	0	0
TOTAL	608.0	1,746	16	608.0	49	0	608.0	110	608.0	1251	608	881	608	50	1365	0	0	0

sq. ft. = square feet
HOA =homeowners association