

Relationship to General Plan

The specific plan cites the General Plan Amendment Report and Appendix A to justify the project within the context of the County's General Plan and the included Valley Center and Bonsall Community Plans. Neither the General Plan Amendment Report, nor Appendix A, is part of the submissions from the Applicant at this point, making comment impossible.

Given the absence of the General Plan Amendment Report and Appendix A, we are led to assume that sufficient justification and consistency with the County's General Plan does not yet exist and, therefore, cannot be made public and a part of this review. Consistency with the recently adopted General Plan is a fundamental first step in proposing a development of this magnitude...a step that this project continues to stumble over.

The degree of change proposed by this project will grossly change the character of the existing rural, agricultural area.

Specific Plan Goals

The Applicant suggests that their Project will "augment" the several other large-scale projects along I-15 between Escondido and Fallbrook. A thoughtful analysis of the referenced projects will show that the only other project that compares with this Project is Lake Rancho Viejo at Hwy. 76. The other projects were approved under a less demanding older General Plan and the two largest projects, Circle R Ranch and Lawrence Welk Resort, are actually clustered developments with an associated open space component of about 40% of the total acreage, unlike this Project which is currently expressing only a 16% open space component.

That being said, a guiding principal of the current General Plan [principle #2] is to permit high-density development within or next to already developed property so that the infrastructure requirements can be more easily met. The goal is not to spread dense development to outlying rural areas where infrastructure must be extended and expanded to meet those needs, as is the case with this Project.

Another new wrinkle in the current specific plan is the Applicant's desire to allow homes proposed for construction within the Project, instead, to be used, possibly, for a time-share resort. This 'possibility' confounds the stated description of the Project as a residential community and wanders even farther from the definition of "specific" in the term 'specific plan.'

Sustainable Community Goals/Policies

In this iteration of the specific plan the Applicant has chosen to diminish their commitment to sustainability by making some of their once earnest goals and features decidedly optional. The recycling facility will be built "if feasible." The use of existing Green Building standards adopted by the County will be implemented but builders will be required only to offer homeowners the "option" of installing energy efficient fixtures and appliances. And, they have abandoned completely

O3e-100

O3e-101

O3e-102

O3e-100 Please refer to response to comments O3e-3 and O3e-89.

O3e-101 The commenter asserts that the other designated Specific Plans because of their density are rural projects. There are eight specific plans (six are residential) approved in the Valley Center Community Planning Area and discussed in the Valley Center Community Plan text including the Circle R specific plan which unlike the others is not designated as 21-SPA. Three of the designated SPAs: Ridge Ranch I, Ridge Ranch II, and Live Oak Ranch include rural densities, but allow for one acre lots and include provisions for sewer service, which is not considered typical for rural development.

Woods Valley Ranch SPA in the same rural regional category as the others includes a rural density but also includes three neighborhoods with lots ranging from 5,000 square feet, 15,000 square feet and one-half acre, plus a golf course, and restaurant. As stated in the Valley Center Community Plan text, this project is designed to, "...create an environmentally sensitive development that successfully integrates a rural residential community (emphasis added) consistent with the community character as described in the Valley Center Community Plan Text," and "...create a rural residential community with an identity consistent with the community character of Valley Center as described in the Valley Center Community Plan Text."

The Orchard Run SPA is located within the urban village of Valley Center, which allows for urban scale development. This SPA includes a density of 7.3 dwelling units per acre in the northern portion and 1.5 dwelling units per acre in the southern portion of the property. The plan will result in the creation of seven residential development areas (Garden Apartments, Patio Homes, Estate Lots, and Executive Homes). As stated in the Valley Center Community Plan text this project is designed to, "...create an environmentally sensitive residential community within the central valley of Valley Center that will offer an affordable and diverse range of housing opportunities within the community, and "...provide for a variety of low to moderate attached and detached housing opportunities using a cluster design in the northern portion of the property."

LETTER

RESPONSE

	<p>O3e-101 (cont.)</p> <p>The Circle R Specific Plan does not include the 21-SPA designation. This specific plan was originally adopted in 1978 and last modified in 1983. Like most of the other Specific Plan designated areas above it is located in a rural land use designation which only allows for a rural density of 1 du/2acres (SR-2). The Circle R specific plan as approved (and built); however, includes 378 townhomes on lots of 2,800 square feet, and 27 'estate' lots with lot sizes up to 4 acres and a golf course and restaurant. It is served by sewer and like Woods Valley and Orchard Run implements and is "...based on the Valley Center Community Plan and the County General Plan.</p> <p>Neither the FEIR nor the Specific Plan includes any provision for time share types of development.</p> <p>An assessment of the proposed project in comparison to the other adopted specific plans in Valley Center illustrates that both the oldest and the most recent specific plans in the rural designated portions of Valley Center include lot sizes comparable to the proposed project and also include sewer service. The project also proposes a General Plan Amendment to establish a Village Regional category and the implementing specific plan also includes scales of development (2.9 du/acre) which are similar to what was adopted 20 years ago with the Orchard Run designated specific plan (1.5 and 7.3 du/acre) in the Village of Valley Center.</p> <p>O3e-102 This comment references prior iterations of the project and not the project description as detailed in the FEIR circulated for public review. As such, this comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.</p>
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their commitment to implementing structural systems that achieve high performance thermal efficiency. These sagging goals seem disingenuous.

Land Use Plan

The Land Use Plan shows some considerable changes based on the shifting acreages among the different types of land uses in the Project. However, the phase descriptions continue to be very conceptual rather than specific. The question continues to be: at what point will the specific plan become specific rather than merely suggestive, contingent or conceptual? There continues to be only one Tentative Implementing Map for phase one with the others for phases 2-5 not scheduled to appear for some length of time after approval of the project. This is rather like buying a pig in a poke.

County Land Use Regulations

The applicant has not justified their proposed general plan amendment to amend the Regional Land Use Element Map changing the Regional Category Designation of their property from Semi-Rural to Village and Commercial designations. To build what the applicant proposes, it is necessary for the designation to change, but they have offered no justification for the change. Such changes to the County's General Plan as well as the Valley Center Community Plan and the Bonsall Community Plan should be justified. The point of such plans is to guide development in a direction that is consistent with the community's desires and commitments to the County for growth.

Distribution of Land Uses

Table 1 – Land Use Summary inaccurately shows a total of 608 net acres, however, addition of the line items in the table totals 611.3 net acres. This should be clarified and corrected.

Table 1 shows that proposed public parkland in the Project decreased from 21 acres in a few parks to 12 acres in a single park since the previous iteration of the specific plan. And, private parkland increased from 4.4 to 11.8 acres in 14 small pocket parks. The county standard for parkland is 15 acres per thousand population for local parks. It seems the numbers are moving in the wrong direction. Further, larger parks would serve the Project better than the multitude of pocket parks described.

Parcel Size Distribution in the Vicinity of Lilac Hills Ranch

The applicant's 1-mile analysis [fig. 6] seems to want to justify high density for the Project by citing that 18% of lots are less than 2-acres. These smaller lots are not recently created, they are the residue of earlier, less carefully considered general plans. The requirements have changed. And, by deduction, 82% of present lots within the 1-mile radius [wherever it is centered] are two acres or larger and consistent with the General Plan. In fact, 46% of lots in the 'radius' are greater than 4-acres. A few moments of reflection would lead to the understanding that the applicant's representation of the parcel size distribution

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O3e-103 This comment references prior iterations of the project and not the project description as detailed in the FEIR circulated for public review. As such, this comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

O3e-104 Please see subchapter 1.1 of the FEIR for the project's objectives. Ultimately, the decision makers will determine whether the amendment is in the public interest and would not be detrimental to public health, safety, and welfare.

O3e-105 This comment references prior iterations of the project and not the project description as detailed in the FEIR circulated for public review. As such, this comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

O3e-106 Community character is established by the uses in an area. The area is characterized by diverse uses and lot sizes with denser uses generally located within specific planning areas. The proposed project is similar in nature and will fit into the established land use patterns. Please refer to Response 57 above. In any event, the commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

LETTER

RESPONSE

can be misleading. Having a greater number of smaller lots within an area does not mean that the majority of the acreage is in smaller lots. In fact, the majority of the acreage within the radius is in larger lots. The analysis should be looking at the acreage within categories of lot size rather than the number of lots of a particular size.

The 5-mile radius analysis [fig. 5] is equally skewed since it attempts to include Circle R Ranch development and Lawrence Welk Resort as high-density developments. Both of those developments are clustered developments and include a minimum of 40% open space, a fact conveniently sidestepped in the analysis. The mobile home park at Lawrence Welk was permitted under an older general plan that has since been superseded.

It should be remembered that the recently adopted general plan and the associated community plans are the defining factor in describing the desired plan for the community rather than the parcel size analysis of the Applicant.

Development Approvals Needed

Apart from the need to amend the General Plan, and the Valley Center and Bonsall Community Plans, the Applicant is asking for approval of a site plan for "V" and "D" special area regulations. Setback designator "V" allows for very close urban spacing of buildings, spacing that is grossly inconsistent with the General Plan and, consequently, the Valley Center Community Plan.

Special Area Regulator 'D' has several Site-Plan criteria that this project fails to adequately address:

"a. Building Characteristics. The dimensions, color, architectural design of the proposed buildings and structures shall be compatible and in keeping with those existing in the designated area."

The proposed project intends to inject a sweepingly new architectural treatment to the designated area. The types, dimensions, densities and architectural design being proposed are not consistent with the Lilac Triangle.

"b. Building and Structure Placement. The placement of buildings and structures shall not detract from the visual setting or obstruct significant views."

The density and heights of proposed buildings and other architectural features will dramatically and adversely impact the present rural, natural and agricultural setting of the area. This impact cannot be mitigated under the provisions set forth in this specific plan and will deprive existing residents of their expectation of a rural, natural life style and environment.

O3e-106
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O3e-107

O3e-108

O3e-107 As noted by the reviewer, the proposed zoning includes the use of both the V Setback Regulator and the D Special Area Regulator. These have been applied for different reasons to assure that all development authorized by the Specific Plan will be implemented with the use of a Site Plan which will include details of the proposed development that otherwise would not be required. The D Special Area Regulator has been applied to require a Site Plan for all development. The Specific Plan includes detailed lot design and architectural design guidelines, and development applications will need to include a Site Plan to identify which lot design and architectural style guidelines will be applied to each lot. Similarly the V Setback Regulator will allow the setbacks for each lot to be established when the individual lot configuration is identified for each lot. These designators will ensure that the development guidelines in Section III of the Specific Plan will be followed.

O3e-108 The D designator allows each lot to be reviewed in accordance with a specific standard. Here the standard to be applied to each lot will be the Specific Plan Guidelines. Therefore, in this context, the Design Guidelines of the Specific Plan will direct the application of this criteria (San Diego County Zoning Code Section 5902.)

"c. Landscaping. The removal of native vegetation shall be minimized and the replacement vegetation and landscaping shall be compatible with the vegetation of the designated area and shall harmonize with the natural landscaping. Landscaping and plantings shall be used to the maximum extent practicable to screen those features listed in subsections "d" and "e" of this section and shall not obstruct significant views, either when installed or when they reach mature growth."

O3e-109

The project proposes to excavate and fill over 4 million cubic yards of earth in pursuit of building sites and common areas on a total of 582.2 acres. Nearly all of the native and agricultural vegetation will be removed and existing agricultural areas will be severely diminished and completely altered as a result. The proposed plan will leave narrow strips, of so-called, biological open space that will be of little or no use to wildlife once other fuel modification requirements are met.

"d. Roads, Pedestrian Walkways, Parking and Storage Areas. Any development involving more than one building or structure shall provide common access roads and pedestrian walkways. Parking and outside storage areas shall be screened from view, to the maximum extent feasible, by existing topography, by the placement of buildings and structures, or by landscaping and plantings."

O3e-110

The roadways proposed do not provide adequate ingress and egress for the proposed housing and commercial areas. The applicant has failed to provide substantive documentation of legal rights to develop adequate access routes for evacuation requirements. Further, the trail network proposed appears to depend on access along Covey Lane, a private easement for which the applicant has demonstrated no legal right.

"e. Grading. The alteration of the natural topography of the site shall be minimized and shall avoid detrimental effects to the visual setting of the designated area and the existing natural drainage system. Alterations of the natural topography shall be screened from view by landscaping and plantings which harmonize with the natural landscape of the designated area, except when such alterations add variety to or otherwise enhance the visual setting of the designated area."

O3e-111

As noted earlier, the project proposes to move nearly four and a half million cubic yards of earth on the 608-acre site, with blasting required for about 20% of that total. Obviously, this will not result in minimal alteration and it will detrimentally affect, in the most gross way the visual setting of this rural, agricultural area.

"f. Signs. The number, size, location, and design of all signs shall not detract from the visual setting of the designated area or obstruct

O3e-112

O3e-109 The D designator allows each lot to be reviewed in accordance with a specific standard. Here the standard to be applied to each lot will be the Specific Plan Guidelines. Therefore, in this context, the Design Guidelines of the Specific Plan will direct the application of this criteria. (San Diego County Zoning Code Section 5902.) In other words, this standard applies to a lot when its site plan is under review. In any event, the project will include an additional 20.8 acres of agriculture, outside of the biological open space, to be conserved throughout the community. The project would also preserve and enhance continued and future agricultural operations at a more optimal location, by Mitigation measure M-AG-1 that requires the purchase of an agricultural conservation easement for 43.8 acres of prime and statewide importance soils at a 1:1. Finally, the FEIR Agricultural Resources Report includes additional measures where deemed necessary to ensure that no significant unmitigated impacts to existing agriculture will occur, such as: 1) 50-foot-wide buffers planted with two rows of citrus, avocado, or olive trees (M-AG-1); 2) Installing 6-foot-high fencing to protect adjacent agricultural activities from unwanted intrusions by people and domestic pets (M-AG-2); 3) prohibiting habitable structures as well as any structure that could attract residents, visitors, or children to congregate nearby (M-AG-3).

With respect to the biological open space being of little or no use to wildlife, the project Biological Open Space plan assures the permanent conservation of wetlands and associated riparian and upland habitats, the restoration of degraded wetland habitat, and the provision of opportunities for wetland enhancement, in accordance with an approved and funded Resource Management Plan that meets rigorous wetland conservation and mitigation criteria required by local, state, and federal natural resource agencies.

O3e-110 Refer to the Global Response: Easements (Covey Lane and Mountain Ridge Roads).

Subchapter 2.3.2.3 of the FEIR analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that overall the road network design for the project would provide adequate ingress and egress for residents as well as emergency access and therefore impacts associated with transportation hazards would be less than significant. See also the evacuation plan.

LETTER

RESPONSE

<p>significant views. Subsequent to the site plan review and approval, any alteration to signs other than general maintenance shall be subject to a new Site Plan or an Administrative Permit."</p> <p>The only reference to signage found concerns the monuments at the entrances to the Project. The monuments description in the specific plan is more nearly marketing language than specific details about construction design and materials. A conceptual design is provided, but it is merely suggestive and provides no assurance that it is consistent with the Valley Center Design Guidelines. Clearly, the specific plan should defer to the existing Valley Center Design Guidelines, and those guidelines should be acknowledged in this plan to direct the implementation of signage for the project as a whole, but especially for the commercial areas within the project.</p> <p>"g. Lighting. The interior and exterior lighting of the buildings and structures and the lighting of signs, roads and parking areas shall be compatible with the lighting employed in the designated area."</p> <p>Since the designated area is presently rural and agricultural and subject to the Valley Center Design Guidelines, the Project and its specific plan should recognize those guidelines as the authority for all lighting implementation. Generally, little lighting is used in this area presently, so any change will be a significant departure from what exists and will severely challenge the present conditions.</p> <p>The specific plan is ambiguous about the need for a recycled water storage tank. This tank may, or may not, be part of a major use permit required for the Water Reclamation Facility. More details and specificity would be helpful.</p> <p>Another approval needed by the Applicant is for the vacation of two existing biological open space easements totaling 3.64 acres. These two easements were at one time considered important set-asides for maintaining regional biological resources, resources that cannot be turned on and off and still retain significance. The Applicant will be setting aside over 102 acres of open space for the same purpose. It would seem prudent and reasonable to include the two existing easements in addition to the proposed easements for this Project.</p> <p>Development Standards and Regulations/Design Concept The Applicant's specific plan suggests that the Project will help support the area's reasonable share of projected population growth. However, that is a specious assertion given that Valley Center's reasonable share of growth is 905 dwelling units [only 755 more than the existing General Plan provides] and more than that number have been accounted for in the plans for the north and south villages. There is no apparent need for the 1746 units being proposed by the</p> <p style="text-align: right;">10</p>	<p>O3e-111 This criteria is to be applied to individual lots. As described above, the D designator allows each lot to be reviewed in accordance with a specific standard. Here the standard to be applied to each lot will be the Specific Plan Guidelines. Therefore, in this context, the Design Guidelines of the Specific Plan will direct the application of this criteria. (San Diego County Zoning Code Section 5902.) In other words, this standard applies to a lot when its site plan is under review.</p> <p>With respect to the project, visual impacts are discussed in subchapter 2.1 of the FEIR. As stated in the conclusions, subchapter 2.1.6, the project would change the composition of the visual environment in terms of dominance, scale, diversity, and continuity, resulting in a significant unavoidable impact. Additionally, short-term construction-related visual impacts would remain significant and unavoidable.</p> <p>O3e-112 Please refer to response to comment O3e-107. The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.</p> <p>O3e-113 Light and glare impacts associated with the project are discussed in FEIR subchapters 2.1.2.4 and 2.1.2.5, respectively. See also response to comment O3e-107 above.</p> <p>O3e-114 The FEIR, subchapter 3.1.7 contains a complete description of the alternatives for wastewater collection and treatment. These alternatives include on-site treatment at a treatment plant shown in the FEIR and Specific Plan as well as alternatives for sending all wastewater to the existing Lower Moosa Wastewater Treatment Facility. The decision about which alternative will be used is the jurisdiction of the VCMWD. The impacts of all alternatives are addressed in the FEIR.</p> <p>The commenter is correct that there are two open space easements that exist within the project site. One open space easement was granted to the County of San Diego in conjunction with Parcel Map No. 17704, on June 10, 1996. The second easement was granted to the County per document No. 1996-030583 on July 12, 1996. Both</p>
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LETTER

RESPONSE

	<p>O3e-114 (cont.) easements prohibit all of the following on any portion of the land subject to the easement: grading, excavation, placement of structures, construction, mineral excavation, trash, dumping or any use other than open space. Limited vegetative clearing by hand as required by the fire authority is permitted within the first open space easement; within the second incidental agriculture, such as nursery crops, is permitted. Both open space easements would need to be vacated for development within those areas in conjunction with the approval of the Final Maps for the project. Both open space easements currently cover agricultural land, which would not require substitute mitigation. A small area of oak riparian woodland that is located within one of the existing open space easements would be preserved within the project's biological open space.</p> <p>O3e-115 The comment suggests that there are established fair share population targets by community. This is not the case. The County accommodates its proportion of regional growth as projected by SANDAG through the many community plans but General Plan does not include a population limit for each community or for the County in general. SANDAG regularly updates their population projections to reflect changes in jurisdictional land use plans, the regional economy and changes in economy. These changes include, for example, land approved for housing that will never be built because of purchases of land for open space. The comment also states that the project is in an area remote from community infrastructure. As noted in the FEIR, subchapter 3.1.7, water is available at the property boundary. There are several options for providing wastewater treatment. Land is designated for a neighborhood park and school, The property is located less than one-half mile from the I-15 corridor. This is much the same of the state of infrastructure for the North and South Villages. Those areas have a water supply. They do not currently have wastewater treatment. Schools already exist but parks must be provided or expanded by the village development. Finally, the North and South Villages are located 20 to 30 minutes from a major interstate highway depending on the route taken.</p>
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Applicant, especially as they are proposed for an area remote from community infrastructure.

Senior Citizen Neighborhood

Although not apparent to the Applicant, the designation of 468 dwelling units for an age-restricted Senior Citizen Neighborhood with a 200-bed assisted living facility could present a significant problem for prospective residents of those units who may need emergency health care. Presently, emergency services cannot respond to the Project within the guidelines required for such service. In addition, the nearest hospital is about 17 miles distant. To have a neighborhood facility for such a potentially fragile population without emergency medical services close at hand may prove problematic.

Another issue is the contention by the Applicant that the addition of kitchens to the 200 individual units in the Group Residential/Care Facility at the time of construction would not impact the total number of other dwelling units [1746 dwelling units]. It seems the definition of 'dwelling unit' has shifted in this case. Under current zoning regulations, this defines an apartment. This is an increase in density of 200 units from the 1746 DU request to a total of 1946 DU's. So, although not counted in the total dwelling units for the Project, they do add, effectively, 200 dwelling units that would seem to drive the overall density up to about 3.2 du/ac from 2.9 du/ac. That proposed increase in density results in an increase in Average Daily Trip traffic generation for the proposed Project. Even without the kitchens, these units are a density deception.

Town Center/Neighborhood Centers

The bed and breakfast of earlier specific plans has become a substantially sized, 50-bed Country Inn. Commercial square footage has been increased from 75,000 sq. ft. to 90,000 sq. ft. (see II-10 Table 3: 61,500 sq. ft.– Specialty Commercial; 28,500 Office). Rather than scaling back the Project for rural compatibility as the VCCPG has suggested in previous comments, the current specific plan is expanding and extending commercial and office areas. The language used to describe these 'centers' continues to be vague and loose and non-specific.

On-site Water Reclamation Facility

There continues to be ambiguity concerning the water reclamation facility being proposed. The specific plan states that Valley Center Municipal Water District will direct trucking of wastewater to an off-site treatment facility for the initial development [presumably phase one], and that wastewater from up to 100 dwelling units may be trucked off-site. However, phase one consists of 350 units, which may necessitate additional trucking of wastewater over narrow twisting roads.

The Project will not build a wastewater treatment plant during the initial phase of development, but, it is not clear from the specific plan when the facility is to be

O3e-115 cont.

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O3e-116 The FPP and Capabilities Assessment report analyzed both EMS and structure fire calls, along with any other type of call, which historically occurred in the DSFPD. The types of calls projected from the project are anticipated to follow County wide statistics for type of call, number of calls per capita per year (with a higher rate for the senior residential and Alzheimer care facility). Based on those numbers, at least 85 percent of the calls will be emergency medical response. A smaller percentage, 3 percent or less, would be structure fires. The options for fire service at the site provide the apparatus and staffing needed to respond to any type of call that would be anticipated from the project.

With respect to the residential care facility adding more density with respect to trip generation, the trip generation rates for the senior citizen community, developed utilizing SANDAG's Guide to Vehicular Traffic Generation Rates for the San Diego Region, is proportionally less than the generation rate shown for other similar types of uses as described in Tables 4.3 thru 4.8 of the TIS.

While the project supports densities up to 24 units per acre, the overall project density is 2.9 units per acre. This was calculated by dividing the number of units by the number of acres in the project. The density identified in the Specific Plan conforms to General Plan Policy LU-1.7 Maximum Residential Densities, which states that residential density is determined by taking the maximum number of dwelling units permitted within the boundaries of any subdivision based on the applicable land use designation. Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2.

O3e-117 This comment does not address the environmental analysis provided in the project FEIR. The commenter's opinion is acknowledged and is included in the project's FEIR for the decision makers to consider.

built. The current version of the specific plan has reverted to an earlier proposal of collecting and trucking the effluent to an off-site facility for treatment, making it unavailable for irrigation. This procedure will add numerous daily trips to and from the Project, trips that could go on for a lengthy but undetermined period. The last proposal was to construct a temporary 26,000-foot [5 miles] four-inch force main sewer line where effluent would be pumped from a temporary pumping station. While the current specific plan mentions treating the trucked effluent, it does not mention if the reclaimed water would be transported back to the Project, which would double the daily trips to and from the Project.

The specific plan has not defined the proposed Project's wastewater management system beyond a platitudinous discussion of top-level options. But, it does appear that a wastewater reclamation plant for recycling of wastewater is proposed on-site to the Project. There is no discussion whatsoever on sewage treatment, leaving an informed reader asking two fundamental questions:

1. If the on-site wastewater plant is only engaged in water recycling, to which Title 22 level of standard and intended usage is the Applicant proposing (see table below)? Describe the on-site treatment processes to be employed.

Table D-1 summarizes the water quality criteria for the four types of recycled water as defined by the Title 22 Code of Regulations. These water types are: disinfected tertiary, disinfected secondary 2.2; disinfected secondary 23; and un-disinfected secondary. Table D-2 summarizes the minimal allowable non-potable uses for each recycled water type. All information contained in this appendix is adapted from, "California Department of Public Health – Regulations Related to Recycled Water January 2009."

Table D-1. Water Quality Standards for Various Water Recycling Sites		
Water Type ^{2,3}	Parameter	Quality Criteria ^{4,5}
Disinfected Tertiary ^{3,6} (recycled water that has been oxidized, filtered and disinfected)	Total Coliform	<ul style="list-style-type: none"> • Median concentration must not exceed 2.2 MPN/100 mL using the last 7 days analyses were completed • Must not exceed 23 MPN/100 mL in more than one sample in any 30 day period • Must not exceed 240 MPN/100 mL at any time
	Turbidity for Filtration Using Natural Undisturbed Soils or a Filter Bed	<ul style="list-style-type: none"> • Must not exceed average turbidity of 2 NTU within a 24-hour period • Must not exceed 5 NTU more than 5 percent of the time within a 24-hour period • Must not exceed 10 NTU at any time
	Turbidity for Filtration Using Microfiltration, Ultrafiltration, Nanofiltration or Reverse Osmosis	<ul style="list-style-type: none"> • Must not exceed 0.2 NTU more than 5 percent of the time within a 24-hour period • Must not exceed 0.5 NTU at any time
Disinfected Secondary – 2.2 (recycled water that has been oxidized and disinfected)	Total Coliform	<ul style="list-style-type: none"> • Median concentration must not exceed 2.2 MPN/100 mL using the last 7 days analyses were completed • Must not exceed 23 MPN/100 mL in more than one sample in any 30 day period
Disinfected Secondary – 23 (recycled water that has been oxidized and disinfected)	Total Coliform	<ul style="list-style-type: none"> • Median concentration must not exceed 23 MPN/100 mL using the last 7 days analyses were completed • Must not exceed 240 MPN/100 mL in more than one sample in any 30 day period
Un-disinfected Secondary (recycled water that has been oxidized but not disinfected)	---	---

O3e-118

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The commenter is concerned that by trucking wastewater in the initial phase, it would mean that wastewater for up to 350 dwelling units would require trucking.

Wastewater treatment plants require a minimal continual flow to start-up and operate. Trucking of raw wastewater to an off-site treatment facility would occur if the new wastewater treatment plant is constructed on-site to serve the first phase of development. Trucking of up to the first 100 homes would allow sufficient flows to accumulate to operate the new treatment facility. Once sufficient flows to operate the plant have accumulated (up to 100 homes), trucking of raw wastewater would cease (subchapter 3.1.7).

With respect to recycled water, Chapter 3.0 of the FEIR describes the recycled water facilities which would be constructed (including a pump station to transfer recycled water from the Lower Moosa Canyon WRF to the project). Additionally, Figure 5-2 in Appendix S – Wastewater Management Alternatives to the FEIR provides an overall exhibit of the proposed recycled water facilities.

2. In what location will sewage treatment occur with a process description of the level of treatment and methodology for disposal of residual solids including long-term agreements if other agencies are involved in solid waste handling?

O3e-119

Residential Component

In the first two drafts of the specific plan, the Applicant claimed an overall density of 2.9 du/ac, which is apparently the smallest applicable category the County recognizes for overall density [the calculation is 1746 du divided by 608 acres]. But, that density has been revised in the third draft, and reported to be an overall density of 2.36 du/ac [the result of dividing 1371 dwelling units on 582.2 acres]. However, that density yield seems specious. The 582.2 acres used in that calculation include open spaces, roads, parks and schools, areas that do not play much of a role in the perception of density. Oddly, the 582.2 acres does not include the areas with the C-34 designation or the 375 du that are a part of it.

O3e-120

Looking at the 375 dwelling units in the Project that occupy 23.8 acres in the C-34 zoned areas, reveals urban densities in excess of 13 du/ac and, of that total, nearly 8 ac would have an urban density in excess of 20 du/ac.

And those densities exclude the 200-bed assisted living facility that questionably doesn't factor into the number of dwelling units.

As we noted in earlier comments, densities of this magnitude [13.8 du/ac and 20.75 du/ac and even the overall density of 2.9 du/ac] are more comparable to large urban centers than the rural, agricultural areas that surround the Project property.

Services and Infrastructure (Water, Schools)

The Applicant asserts that it is "looking at" four sources of water to meet the Projects needs in addition to Valley Center Municipal Water District [VCMWD] water, including "ground water, rain water harvesting, grey water and reclaimed water." Apart from the existing water wells on-site for ground water, which will be subject to VCMWD guidelines that are unexplained, the Applicant is vague about the other sources and specifically how they will be employed. The Applicant says cisterns and roof collection systems are "allowed" on single-family dwellings, but does not commit to employing them. Grey water systems are an "allowed use", but there is no commitment to employ them. And, the Applicant suggests the possibility of obtaining additional treated water from the Moosa Treatment Plant, although the plant does not have tertiary treatment capability and does not produce recycled water. This is all too fuzzy for a specific plan.

O3e-121

O3e-119 EIR Appendix S – Wastewater Management Alternatives describes the specific treatment processes which would be constructed for each alternative. The appendix also describes that the level of treatment will be to Title 22 requirements for unrestricted reuse. Also described further in Appendix S, disposal of residual solids (whether from the new on-site or the Lower Moosa Canyon WRF) will occur via local landfill (as is the current practice at the Lower Moosa Canyon WRF).

O3e-120 (a) The overall project density is 2.9 units per acre. This was calculated by dividing the number of units (1,746) by the number of acres (608) in the project. The density identified in the Specific Plan conforms to General Plan Policy LU-1.7 Maximum Residential Densities, which states that residential density is determined by taking the maximum number of dwelling units permitted within the boundaries of any subdivision based on the applicable land use designation. Section I.B. of the revised Specific Plan, further describes that the actual residential density permitted by the Specific Plan is calculated by dividing the residential units contained within the "RU" zone (1,371) by the land designated "RU" which equals a density of 2.36 du/acre. This is not an overall density, as the commenter has stated. Section I.B. and Table 1 calculate and describe that the C34 zone allows for 375 units on 27.8 acres, which equals a density of 13.5 du/acre. Lastly, this comment incorrectly references 582.2 acres as part of the yield calculations. The correct acreage for the "RU" zone is 580.2 acres (608 acres minus 27.8 acres zoned C34 equals 580.2 acres zoned for RU.)

(b) The comment incorrectly refers to 23.8 acres as the acreage for the C34 zone. The correct acreage of C34 zone is 27.8 acres. The overall density within this zone is 13.5 du/acre (calculated by dividing 375 units by 27.8 acres). Please refer to Global Response: Project Consistency with General Plan Policy LU-1.2.

(c) The 200-bed assisted living facility is not considered a "residential" use under County land use policy and thus does not meet the criteria to be defined as density. As explained in Section II.B.6.a. in the Specific Plan, "a maximum of 200 group residential and/or Group Care units complete with the required group kitchen facilities. Because of the central kitchen this use is classified as a "Civic" use and not a "Residential" use, so these units do not count against the project density."

LETTER

RESPONSE

	<p>O3e-120 (cont.)</p> <p>(d): With respect to the comment that densities such as in the project are not comparable to the rural surrounding areas, please see subchapter 3.1.4 regarding community character. The community character of both the Valley Center and Bonsall is acknowledged as rural communities with relevant goals within each community plan addressing interest in preserving the rural character of the planning areas. Specifically, Goal 1 of the VCCP Community Character Goals is to preserve and enhance the rural character of Valley Center. The project is designed consistent with the County's Community Development Model, which contains the highest densities in the center of the community, and the lowest densities at the edges, along with many different densities and architectural styles, integrated into a cohesive community through landscaping, trails, and a Town Center to provide community focus. The Design Guidelines and other provisions of the Specific Plan assure that monotony in design is avoided. The proposed project further assures consistency with relevant policies associated with this goal through the requirement for Site Plan review. Additionally, BCP Policy LU-1.1.1 requires development in the community to preserve the rural qualities of the area. Conformance to this policy is reflected through the varied land uses proposed within the project site including different patterned homes, the maintenance of on-site agriculture within biological buffers and common areas, and small village commercial centers. Additionally, the project places the highest density of homes closest to the center of the site, furthest from adjacent agricultural operations. Developing the village in this manner would provide housing needs in a compact village design. Please also refer to the response to comment O3e-3 and Appendix W.</p> <p>O3e-121 Water supply for the project would come from the Valley Center Municipal Water District (VCMWD). A Water Supply Assessment (WSA) was prepared for the project by the VCMWD (Appendix Q of the FEIR). The WSA report evaluates water supplies that are or will be available during normal, single-dry year, and multiple dry water years during a 20-year projection to meet existing demands, existing plus projected demands of the project, and future water demands served by the VCMWD. As detailed in the WSA and in subchapter 3.1.7 of the FEIR, the project's total anticipated imported water demand would be less than the project's site's existing water</p>
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The issue of which school districts will be serving the proposed Project continues to be unresolved. The latest specific plan proposes a twelve-acre site for a K-12 school, but there is no Project Availability Form from Valley Center-Pauma Unified School District, or Bonsall Union School District agreeing to manage the school. Further, the Applicant has excluded the Fallbrook Union High School District from their current specific plan even though the Project is still partially within that district and potentially will be served by that district. The issues of school location and school district choice matter because it fundamentally affects the project's required traffic study. Are students to go to school in Valley Center and be bussed or driven over that set of highly impacted roads or are they to go to school in Bonsall or Fallbrook and be transported that way? Where traffic will be directed affects where roads will be impacted and need improvement.

O3e-122

Since neither Bonsall nor Valley Center has indicated a willingness to manage an additional school, the Applicant now suggests that "a private school may desire to acquire the site for a 'charter' school." It is further suggested that if neither a public nor private entity is interested in establishing a school, the project may just place housing on the site currently reserved for the school. How, then, are the community or other decision makers to know which roads will be impacted and by how many children (will we need to consider K-12 or just high school students) or how to evaluate the data provided in the traffic study?

Open Space/Conservation Policies

The Project's conservation goal of sparing the most sensitive habitats on the property presents itself well on first hearing. However, as laudable as saving sensitive habitat is [and it is required], the Project will be excavating and mounding the remainder of the Project site [that's about 1.5 cubic yards of earth moved for every square yard of the Project property]. Further, the Applicant has abandoned the notion of developing any off-site mitigation of sensitive habitat within close proximity of the MSCP PAMA. So, restoration of habitat could occur almost anywhere else but the Project site or its immediate neighborhood. This prospect is dismaying in that the destruction of habitat in Valley Center may lead to restoration of habitat elsewhere in the county without benefit to Valley Center.

O3e-123

Circulation Goals & Policies/Street System

The circulation goals/policies have changed little from the previous version of the specific plan, except in one respect. There is apparently no further interest in integrating private road development in the Lilac Hills Ranch Specific Plan with existing land uses in the surrounding areas and the regional transportation network. This appears to mean that the circulation system in the Project will be effectively closed except for the "Main St." bypass to West Lilac Road. This has implications for the Special Area Regulation "D" designation site plan considerations.

O3e-124

Both figures 14 [Specific Plan Map] and 24 [Project Internal Circulation Map] show what is available of the internal road system, but continue to fail to show

O3e-121 (cont.)

demand in light of water demand offsets including the use of recycled and existing groundwater. Based on the VCMWD's water supply reliability analysis contained in the 2010 Urban Water Management Plan, the WSA concludes that the VCMWD would have adequate water supply to meet and exceed expected demands for a 20-year planning horizon, including the project's water demands. In addition, the VCMWD issued an updated letter dated May 6, 2014 verifying that the conclusions of the WSA are still valid considering recent drought conditions and associated water use restrictions. This letter has been included as a cover letter to Appendix Q of the FEIR. The mix of water to be used to supply potable and landscaping supplies will be determined by the VCMWD. Chapter 3 of the FEIR describes various alternatives and analyzes the impacts of each. Rain barrels will also be allowed and encouraged. The use of either or both systems would reduce the cost of water to individual users.

O3e-122 Both districts have provided service availability letters. With respect to the comment that the school district that will serve the project is unresolved, it is incorrect. As noted in subchapter 3.1.5 of the FEIR, Chapter 3, Proposition BB was approved by voters in Fallbrook and Bonsall school districts to create a new K-12 district. A new Bonsall high school would be established by the district using existing facilities. The Bonsall Unified School District is composed of four schools all of which could potentially serve the students.

Approximately 401 acres of the project site are located within the VCPUSD. According to the PFAF, a number of schools could serve the project within this school district.

Ultimately, the provision of school services is the responsibility of the school districts. Students would attend schools in the district in which they are located if or until a school is built on-site. The districts are not obligated to build the school and would make any such determination based on need. The school site is being offered to the local districts or to potentially a private school. However, ultimately per SB 50, statutory fees are the exclusive means of mitigating school impacts.

LETTER

RESPONSE

	<p>O3e-122 (cont.) The traffic study (FEIR subchapter 2.3) addressed traffic impacts based on current school district boundaries which includes trips generated by the proposed school. Section 12.3 of the Traffic Impact Study analyzes the traffic impacts that would occur if the school is not built, again using current district boundaries.</p> <p>O3e-123 As discussed in the FEIR subchapter 2.5, the proposed project preserves 103.6 acres of natural habitat on-site, consisting mostly of wetlands and riparian woodlands. It is anticipated that mitigation for wetland impacts will be provided onsite through restoration and enhancement. Mitigation for upland vegetation would be provided off-site within the proposed PAMA. Consistent with the proposed North County MSCP, the location would be anywhere in the PAMA that supports the appropriate vegetation. Limiting the mitigation location to a specific location may not provide the most benefit to the resources being conserved.</p> <p>O3e-124 The comment that the private roads are not integrated with existing land uses in the surrounding areas and the regional transportation network. In particular, the commenter asserts this would mean that the circulation system in the project will be closed except for Main Street bypass to West Lilac Road.</p> <p>The proposed circulation plan for the project is shown in the FEIR, Chapter 1.0, Figure 1-7, which shows both on- and off-site road improvements. Regional access to the project would be from West Lilac Road that leads directly to the Walter F. Maxwell Memorial Bridge over I-15 providing access to this freeway and SR-76. The project can be accessed by the public from West Lilac Road and Covey Lane. Main Street provides an alternate route to West Lilac Road through the project, allowing that portion of West Lilac Road to maintain the existing centerline. The FEIR also analyzed the issue of transportation hazards with respect to the road network design for the project, and determined that impacts associated with transportation hazards would be less than significant. The overall road network design for the project would provide adequate ingress and egress for residents as well as emergency access and conform to Goal M-4. The roads within the project site were designed to accommodate emergency vehicles and allow residents to evacuate efficiently if necessary (Policy M-4.4) and the project would provide four</p>
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LETTER

RESPONSE

	<p>O3e-124 (cont.)</p> <p>connecting points to existing roads ensuring that both local and surrounding residents have alternate routes (Policy M-4.2) (FEIR, Subchapter 2.3.3.3.). The FEIR and Specific Plan, both state that the roads within the proposed project are private but are open to use by the public. The only exception to this is the senior community which is gated.</p> <p>The comment also states that the maps failing to show residential private roads in any of the residential phases and the connection of the two halves of the Lilac Hills Ranch Road in the vicinity of Covey Lane.</p> <p>The Specific Plan shows the circulation system necessary for the entire project. The street system for each phase will be designed at that time and shown on subsequent implementing tentative maps.</p> <p>With respect to the comment about the map that shows a private road arrow, the proposed project does show Lilac Hills Ranch Road, a private road, crossing an existing legal lot to re-enter the project area. That lot is owned by the project applicant. It is not included within the Specific Plan area, nor is it required to be. A Specific Plan amendment would be needed in the future should the landowner desire to add this lot to the Specific Plan.</p> <p>With respect to the comment that the request to reclassify from West Lilac Road Mobility Element Classification from a 2.2C light collector to a 2.2F light collector to divert traffic through their commercial center along 'Main Street' without regard to the existing community, this is incorrect.</p> <p>The proposed change in Mobility Element Designation from Light Collector 2.2C to 2.2F will allow the current centerline to be maintained. This will reduce impacts to residents with direct access to West Lilac Road, maintaining the current nature of that road. The County Mobility Element currently classifies West Lilac Road between Old Highway 395 and Covey Lane as a Light Collector with intermittent turn lanes (2.2C) while the segment between Covey Lane and Circle R Road is classified as a Light Collector with reduced shoulder (2.2F). Both the 2.2C and 2.2F standards require two 12-foot travel ways and two 12-foot-wide parkways (i.e., the area between the curb and the right-of-way). The 2.2F standard requires</p>
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LETTER

RESPONSE

	<p>O3e-124 (cont.)</p> <p>two-foot-wide shoulders while the 2.2C requires shoulders that are two to eight feet wide. A road built to 2.2F standards requires a narrower right-of-way which is essential in reducing the impacts of road widening on the existing adjacent homes. The south half of the road along the project boundary will be improved to 2.2F standards consistent with standard subdivision practice. A multi-purpose trail will be added as discussed in the FEIR and Specific Plan, Chapter 2.0, consistent with the Valley Center Community Plan. The analysis in the FEIR analyzes this segment of the roadway consistent with 2.2.F standards. Per the FEIR Table 2.3-1, with the Mobility Element amendment, all segments of West Lilac Road will operate at LOS A-D when the project is built out with the 2.2F classification. (The analysis of West Lilac Road without modifications can be found in subchapter 4.8 of the FEIR, Analysis of Road Design Alternative.)</p> <p>The proposed road system does follow the topography as much as is allowed and still be consistent with County road standards.</p>
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residential private roads in any of the residential phases. The maps are unclear about the connection of the two halves of the Lilac Hills Ranch Road in the vicinity of Covey Lane. The maps also show a residential private road arrow traversing over property outside the Project boundary with no explanation of right of way.

West Lilac Road forms much of the northern border of the Project and is a county mobility element road. The current specific plan changes the West Lilac Road Mobility Element Classification from a 2.2C light collector to a 2.2F light collector. It is unacceptable to make that change to accommodate the aims of the Applicant to divert traffic through their commercial center along 'Main St.' without regard to the existing community. The 2.2C light collector classification provides better traffic flow and greater traffic capacity because it includes dedicated turn lanes. These are essential characteristics for a mobility element roadway. The 2.2F light collector classification has a reduced two-foot shoulder, a rolled curb with graded pathway and a narrow right of way. Figure 25 of the specific plan shows a street section for the proposed change to West Lilac Road with an 8-foot minimum meandering pathway alongside. However, the standard should be a 10-foot minimum pathway.

The same concerns generated by earlier versions of the specific plan regarding roads that are graded to the natural contours with minimal disturbance to the natural terrain continue in this version. The lack of rural compatibility and sensibility in this specific plan extends to the residential architectural standards as well as the roads.

Community Recreational Elements

The trails network is somewhat changed from previous versions of the specific plan, but the trail standards for the various types of trails continue to be an issue. The Project should adopt the trail standards of the Valley Center Trails Association/County as a way of implementing consistent standards for public trails throughout the Project. The standards for the Project's 'public' trails allow the tread area to narrow to as little as 3 feet, an unacceptable width for new trails.

Conclusion

Surely, the Lilac Hills Ranch Project tramples far too much of the General Plan and the Community Plans to be approved. The County should instruct the Applicant to revisit those plans and conform the Project to them. The Applicant's General Plan Amendment and Specific Plan—which deviates so greatly from existing planning law—could, if approved, set a new precedent in San Diego County land use policy that overrides the intent of the General Plan and severely diminishes the authority of the community plans. The Applicant must provide the VCCPG the kinds of specific, detailed information necessary for a reasoned

O3e-124 cont.

O3e-125

O3e-126

O3e-125 The proposed trail system includes a variety of trails as described in the Specific Plan. The trail system incorporates some of the existing dirt roads to minimize the need for new disturbance of natural vegetation. The County Parks and Recreation Department has determined that the proposed trail system is acceptable.

O3e-126 The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

With respect to the comment requesting that the Applicant provide the VCCPG the kinds of specific, detailed information necessary for a reasoned evaluation, the project's FEIR includes an executive summary, six chapters of environmental analysis and 35 technical appendices. CEQA requires an EIR to provide a reasonable, good faith disclosure based on a practical analysis of environmental impacts even though others may disagree with the underlying analysis or conclusions. An EIR should provide sufficient information to enable decision makers and the public to understand the environmental consequences of a project. Reviewing courts will resolve any disputes regarding the adequacy of an FEIR analysis in favor of the lead agency if there is substantial evidence in the record supporting the EIR's approach. (Laurel Heights Improvement Assn v. Regents of California (1988) 47 Cal.3d 376.) CEQA Guidelines 15384 defines substantial evidence to mean enough relevant factual information from which reasonable inferences can be drawn.

The statement also states that none of the issues requiring resolution identified in the October 22, 2012 Valley Center Community Plan comment letter or the December 10, 2012 Planning and Development Services letter to the Applicant have been addressed. Both these letters predate the public review period of the FEIR. CEQA requires that comments on a draft EIR should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the project's

LETTER

RESPONSE

evaluation. Most of what we have been presented so far is suggestive, contingent or conceptual with no intent to commit to a specific plan.

None of the substantive issues requiring resolution identified in either the October 22, 2012 Valley Center Community Plan comments or the December 10, 2012 Planning and Development Services letter to the Applicant have been addressed.

Those of us who have read iteration after iteration of the Lilac Hills Ranch Specific Plan are mystified. We are not seeking unusual or difficult documents. We wish merely to have this applicant produce the standard studies and analyses that all past applicants have been required to prepare so we can efficiently review the Project for compliance with the Community Plan and the General Plan. We want the Project to show respect for the General Plan and its principles. We want a project that will not destroy Valley Center, the lives of our neighbors and the entire planning process in the County.

O3e-126 cont.

Appended 22 October 2012 Comment Letter:

October 22, 2012

To: Mark Slovick
Project Manager

From: Valley Center Community Planning Group

Re: Lilac Hills Ranch Specific Plan
GPA 12-001; SPA 12-001

O3e-127

Introduction

On September 25, 2012, Accretive Investments submitted to the Department of Planning and Development Services [DPDS] the Specific Plan and tentative maps for their Lilac Hills Ranch Development. Subsequently the documents (Plan Text and some maps) were provided to the Valley Center Community Planning Group for review. The pages that follow provide commentary on the materials that we have in hand.

The available documents continue to be incomplete and not sufficient for a full review. Many key elements such as the Traffic Study and other technical reports are not yet available. We continue to reserve the right to make additional comments as more key documentation is released to the community. This letter

O3e-126 cont.

significant effects might be avoided or mitigated, especially specific alternatives or mitigation measures. (Guidelines 15204(a).) Since the attached letters were written before the FEIR was out for public review, the letter goes beyond the scope of CEQA and does not raise any environmental issue with respect to this document. Therefore, no response is required.

O3e-127 Title and introduction of exhibit is acknowledged.

The statement also states that none of the issues requiring resolution identified in the October 22, 2012 Valley Center Community Plan comment letter or the December 10, 2012 Planning and Development Services letter to the Applicant have been addressed. Both these letters predate the public review period of the FEIR. CEQA requires that comments on a draft EIR should focus on the sufficiency of the document in identifying an analyzing the possible impacts on the environment and ways in which the project's significant effects might be avoided or mitigated, especially specific alternatives or mitigation measures. (Guidelines 15204(a).) Since the attached letters were written before FEIR was out for public review, the letter goes beyond the scope of CEQA and does not raise any environmental issue with respect to this document. Therefore, no response is required.

and the letters dated June 11, 2012 and July 9, 2012 (both attached) should not be construed as our "one bite of the apple."

Furthermore, many of the objections contained in this letter have been raised in previous reviews. Most have not been addressed by Accretive in the new iteration of the Specific Plan and so our substantive concerns remain. We continue to be concerned as well by the lack of clarity in most aspects of the plan and with the absence key documents.

Based on the materials available for review thus far, the Valley Center Community Planning Group is strongly opposed to the approval or construction of the Lilac Hills Ranch project. The pages that follow detail our objections to the Specific Plan. We begin by outlining seven areas that we find critically important—and that, in themselves, appear to be a strong argument for refusing the plan. Later in this document we discuss the seven objections in greater detail along with other, lesser main concerns. The seven main objections include:

1. The Project is too large and too dense for Valley Center and it is improperly located. Placing 1,746 homes and 5,000 people on 608 acres with densities as high as 8.8 dwelling units per acre is simply incompatible with the rural location in which the Project has been sited.

2. Roads and Traffic. The nature of the roads that must carry traffic generated by Lilac Hills Ranch is one of the most fraught and difficult topics associated with this project. The area has been able to move cars across winding, two lane roads that pass through hilly landscape only because of its present lack of density. With the addition of 1,746 homes, the roads will, without extensive new road construction plus considerable widening and straightening, will be greatly challenged to handle, safely and efficiently, the additional five thousand individuals who will populate the development. The county's limited road construction budget will be severely taxed—and diverted from other pressing needs—to provide for the huge influx of automobiles created by Lilac Ranch. Questions of the cost of road construction, evacuation needs and acquisition of rights-of-way by the applicant are also extremely serious.

3. Compliance with the General Plan The Lilac Hills Ranch Specific Plan threatens to overturn virtually every element in the County's new General Plan adopted in 2011 after 12 years of discussion and community involvement, millions of dollars in government expenditures and countless hours of effort on the part of local citizens. If the Lilac Hills Ranch Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the General Plan. Exactly what destruction of local communities does the General Plan prevent?

4. Services and Infrastructure-Water, Schools, Fire, Waste Treatment Infrastructure is expensive. Putting in new roads, adding additional lanes to a

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

Lilac Hills Ranch is seeking to build a city the size of Del Mar that will require an almost entirely new infrastructure--new roads, schools, sewer systems and a broad range of other infrastructure items. That a private development could or would build this expansively strains credulity. The Valley Center Community Planning Group doubts the viability of this approach.

5. LEEDS/ Sustainable and Walkable Community. It is necessary for the Lilac Hills Ranch project to argue that they are at least potentially able to qualify for LEEDS certification in order to avoid the General Plan prohibition on Leapfrog Development. The project, placed as it is miles from the heart of Valley Center, violates Guiding Principle 2 and General Plan Policy L-1 which defines and governs Leapfrog Development. Leapfrog Development is defined as Village densities located away from established Villages or outside established water and service boundaries. Lilac Ranch Hills *is* leapfrog development and it cannot qualify as a LEEDS community under any reasonable understanding of the standards.

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

7. Twists of meaning and lack of clarity in the plan. One of the most difficult aspects of the Lilac Hills Ranch Specific Plan is the extent to which it makes misleading claims. They would have us believe that they are building a LEEDS or equivalent development even though Lilac Hills Ranch violates virtually all LEEDS standards, that adding 5,000 residents to a rural area actually improves traffic over narrow winding back roads, that grading and moving 4.3 million cubic yards of earth (enough to build a path 4 feet wide around the equator) preserves natural resources and habitat for animals.

Broader Discussion of the Seven Major Problems.

1. Lilac Hills Ranch is too Large, too Dense and in the wrong location. To place a city the size of Del Mar in a rural area fundamentally alters the character of the community in almost every way. It poses major problems for evacuation in the event of fire (a major issue in a community like Valley Center), complicates the provision of services and the creation of adequate roads. The development destroys the quality of life for individuals who already live in that area.

There is nothing remotely like the proposed project in Valley Center. It's size—608 acres and 1746 dwelling units plus Assisted Living facilities of an undetermined size—its density—locating up to 8.8 dwelling units per acre on land that is currently zoned semi-rural by the new General Plan allowing only 1 dwelling unit per four acres (400 of the acres) or 1 dwelling unit per 10 acres (132 of the acres)—and its location of urban densities and infrastructure in an area long reserved for rural living and agriculture are all wrong for the site they have selected.

More fundamentally, there is no need for this project in order to provide housing or services for Valley Center. Valley Center is already accepting and planning for its share of San Diego County's growth through 2030 as predicted by SANDAG. About 25% of that growth will be served by the construction of two compact Villages built along Valley Center road. Valley Center population will nearly double from its current 19,000 to 38,000. In preparation for the construction of these Villages (which are near schools, fire protection, parks and libraries), Valley Center Road has been widened and improved at a cost of \$54,000,000.

Extending sprawl and urban development into agricultural portions of the county is a mistake—and for what purpose? Valley Center is actively planning and investing in developments that do a better job of locating homes where infrastructure and people already exist.

Roads and Traffic

The Roads that exist in and around the site of the Lilac Hills Ranch project are decidedly small, winding and built to carry the volume of traffic associated with a relatively unpopulated rural area. The population increment that the Project proposes will necessitate extensive building, widening and reconfiguring of roads at great cost.

On October 12, 2012, the North County *Times* reported that the Board of Supervisors voted to reduce developer fees (TIF) by half. The fee rates, which have been a source of criticism from building industry leaders, were set to pay for \$900 million of expected road improvements. According to the North County *Times*, "County Officials now say \$353 million is needed to support growth

LETTER

RESPONSE

because the county's newly approved General Plan favors compact, town-center development in rural communities and it severely limits growth in areas without adequate road, water and sewer service." Approval of the Lilac Hills Ranch stands in direct opposition to this decision. With the TIF greatly reduced, compact, contiguous development takes on even greater significance.

In addition to the need to build expensive new roads to carry traffic created by the development, the Lilac Corridor roads are a critical pathway for evacuation. In the event of a major fire or other disaster in Valley Center, the Lilac Hills Ranch development will act like a cork in a wine bottle. Its thousands of residents will clog the roads preventing the evacuation of residents who live in more central areas of Valley Center. Even costly new roads will likely not be sufficient to safely move the volume of traffic that will crowd them should evacuation be necessary.

The Specific Plan cites goals for its circulation plan that are clearly not met by the roads it would construct. The goals call for a safe and efficient circulation system but Figure 24 in the Specific Plan presents a circulation map that is highly inefficient. The connections between the northern and southern pods of the Project are tenuous. It is unclear that sufficient easements are in place to allow any connection between the north and south pods. The Project's entrance and exit in the south pod along Mountain Ridge Road is questionable in terms of legal access. Residential roads throughout the Project are only indicated by suggested starting points rather than mapped placements. It seems that the applicant is seeking the entitlements to build this Project without providing the details needed to evaluate the impact of the entitlements.

The *Traffic Impact Study* necessary to evaluate traffic and circulation impacts has yet to be provided. While it is clear that new roads will be constructed, considerable mystery surrounds what will be done and what traffic loads will be accommodated. Thus, the Specific Plan is lacking in adequate detail to enable proper analysis of the compliance of the proposed road network with county standards. In addition, the Valley Center context map incorrectly shows Road 3A as passing through the project. Road 3-A was deleted from the General Plan last year and should be removed from all maps of the area. *The Valley Center Community Planning Group asks that the Traffic study be provided at the earliest date possible because it is key to a clear analysis of traffic impacts.*

The private roads described in the Specific Plan and Master Tentative Map have several road intersection designs that pose safety concerns. Further, in the Specific Plan and Master Tentative Map the applicant is asserting legal rights to road easements on Private Roads for which the applicant likely does not have rights to access or use.

Traffic Impact and Traffic Impact Study

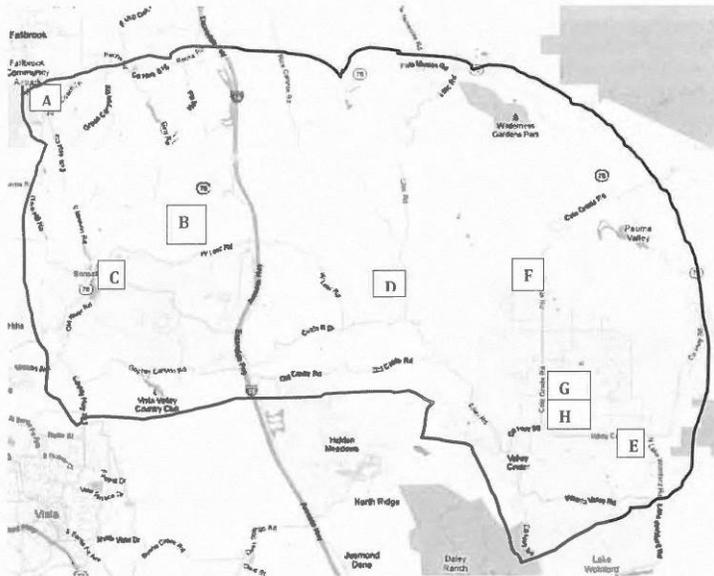
LETTER

RESPONSE

The September 2012 second draft of the Specific Plan is the first release to the public by the County of any information that enables even rough order of magnitude (ROM) sizing of vehicular traffic generated by this proposed commuter, high density, urban development not serviced by transit facilities and nearly 20 miles from the nearest SANDAG designated Employment Center.

Using SANDAG Mixed Use Trip Generation Model V4 for Average Daily Trip (ADT) generation, it becomes apparent that approximately 31,000 average daily trips (ADT) will be generated. The 31,000 trips are *9 times* the current 3,500 ADT load that moves on Circulation element roads with current land use and residential pattern. If roads must carry this new volume of traffic they will require extensive off site public road improvements to avoid Level of Service F conditions. (See Appendix A for detail on the application of the Mixed Use Generation Model V.4)

Because of circulation patterns that will include Valley Center and Bonsall schools and other daily commutes, the Traffic Impact Study Area must include an area that covers roughly SR-76 to the north, Valley Center Road and Lake Wohlford Road on the east, Castle Creek/Gopher Canyon to the south, and East Vista Way in Bonsall to the West. The schools that may service the Project and an outline of the proposed Traffic Impact Study Area are below:



- Traffic Impact Study Area Zone
- A – Fallbrook High School
 - B – Bonsall Middle School
 - C- Bonsall Elementary School
 - D- Lilac Elementary (VC)
 - E- VC Middle School
 - F- VC High School
 - G- VC Primary School
 - H-VC Elementary School

The Valley Center Community Planning Group requests that the County require that the Traffic Impact Study Area be as broad as indicated above and that the County release such Traffic Impact Study for Public Review immediately.

Safety Concerns

In *West v County of San Diego et.al. 37-2008-00058195-CU-PO-NC*, the County is being sued for defective design of the intersection of Covey Lane at West Lilac Road resulting in a vehicular fatality on August 9, 2007.

The Applicant is proposing multiple traffic designs that have systemic safety issues far greater than *West* alleges. The private roads described in the Specific Plan and Master Tentative Map have multiple road intersections and designs that raise safety concerns.

For example, the Applicant's proposed use of Covey Lane as an "Interim Public Road" 600 feet from the intersection of West Lilac Road (as indicated in the Tentative Master Map) along with dramatically increasing Average Daily Trips at the intersection is a major safety issue. There is a very limited sight line at this intersection. At the level of traffic the Applicant is proposing, extensive off site improvements to West Lilac Road and the addition of a traffic signal or similar controls are likely required. The Applicant has not provided for these measures in his design.

There is an additional safety issue of major concern with the Applicant's proposed integration of the existing Covey Lane Private Road with the "Covey Lane 600 foot Interim Public Road." The merger of the existing 40' private road with the Public Road appears not to conform to road design standards.

The Applicant's proposed use of Mountain Ridge as a Private Road, 3800 feet to the intersection of Circle R Road (as indicated in the Tentative Master Map) along with increasing the average daily trips at the intersection more than two orders of magnitude, is another major safety concern. There is an extremely limited sight line at this intersection. At the level of traffic the Applicant is proposing, extensive off site improvements to Circle R Road and addition of a traffic signal or similar controls are likely required. Again, the Applicant has not provided for these measures in his design.

The Applicant's proposed 500-foot transit of Lilac Hills Ranch Road across APN 128-290-78-00 and intersecting Covey Lane (See page III-6 of the Specific Plan) and the increase in average daily trips at the intersection by more than three orders of magnitude is a major safety issue. There is less than a 100-foot sight line at this intersection. At the level of traffic the Applicant is proposing, extensive off site improvements to the existing Covey Lane Private Road and addition of a traffic signal or similar controls are required, unless the Applicant is proposing an elevated bridge.

The use of traffic circles (at these dimensions and traffic volumes the Institute of Traffic Engineering defines these as Traffic Circles, not "Roundabouts") to merge

LETTER

RESPONSE

the Applicant's proposed "New West Lilac Road" with the existing West Lilac Road as indicated in the Tentative Master Map appears more driven by the desire to minimize the amount of land dedicated to public road use and the avoidance of the non-recurring and recurring cost of traffic signals than it does with public safety. There is a safety concern with this proposed use of traffic circles because of the lack of information and experience and documented safety data for similar designs in San Diego County. The Valley Center Community Planning Groups asks that the County perform Safety and Traffic Load analyses of these Traffic Circles as designed and release the results to the Public for review at the earliest possible date. In fact, the Valley Center Community Planning Group requests that the County perform Safety and Traffic Load analyses on all of these safety concerns and share them with the public at the earliest possible date.

Legal Rights for Private and Public Road Easements.

On February 7, 2011, the County issued the Applicant the following instructions regarding Easements in the Pre Application Scoping Letter MPA 10-25:

4. Off-Site Grading for Public and/or Private Road Improvements

To allow for public and/or private improvements for areas outside the boundary of this subdivision along Interstate 15, Old Highway 395, West Lilac Road, proposed Mobility Element Road 3A, Birdsong Drive, Covey Lane, Mountain Ridge Road, Nelson Way, Rodriguez Road, and other roads in the vicinity of the project site, the following shall be completed:

It is the applicant's responsibility to provide suitable evidence that offsite improvements including grading, dedications, grants (if any), and easements can be accomplished without resorting to County of San Diego assistance. This evidence can be provided in several forms (provide a letter of explanation with the below forms) used:

- A Title Report showing applicant has the right to construct improvements along with a Title Company Guarantee (\$20,000) acknowledging those rights;
- Recorded Grant Deed or Recorded Right To Purchase for the area where improvements are to be constructed;
- Other evidence satisfactory to the County that clearly shows an existing and continuing right to construct the required improvements.

The applicant's evidence must also show the ability to have any existing utility easements subordinated to the new Public Easement (if any) as per County Subdivision Ordinance. The foregoing must be accomplished to the satisfaction of DPLU and DPW prior to DPW writing final requirements for this project.

Provide a Map, to Engineer's scale, which clearly indicates any off-site road Easements/Dedications/Letters of Permission to Grade/Improve to be acquired, existing I.O.D.s, existing Public Road Easements, etc. Letters of Permission to Grade/Improve must be notarized. Please note that existing off-site road easements may need to be expanded to accommodate road widening required by the project. The ultimate right-of-way width required would be determined through the results of a traffic study.

A coalition of concerned property owners and a surveyor retained by the property owners have done extensive research into road easements asserted by the Applicant in the Specific Plan (SP) and Master Tentative Master Map (TM).

In the Master Tentative Master Map, we believe that the Applicant has placed Roads in locations for which he has no Legal Rights. Those roads are:

1) *Mountain Ridge Private Road*. On Sheet 8 of the Temporary Map and in the Specific Plan, the Applicant has indicated the implementation of future road improvements and use of Mountain Ridge as a private road for purposes of traffic circulation for his Development. On Sheet 2 "Existing Easements" and Sheet 3 "Easement Notes", the Applicant has referenced no road easements for use of Mountain Ridge beyond the boundaries of his proposed subdivision. Detailed

analysis of the Title for APN's 129-300-09 and 129-300-10 has indicated that there are no Easements for usage of Mountain Ridge from the proposed Subdivision Boundary and 3800 feet southerly until the intersection with Circle R Road.

The Valley Center Community Planning Group requests that the Department of Planning and Development Services [DPDS] obtain Certified Legal Road Easements from the Applicant for Mountain Ridge consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for public review in the near future.

2) *Six hundred foot Covey Lane west of West Lilac as a public road.* On Sheet 8 of the Tentative Map and in the Specific Plan, the Applicant has indicated the implementation of a future approximate 600-foot Covey Lane Public Road for purposes of connecting West Lilac Road to his proposed Subdivision on APN 129-010-68 of his proposed Subdivision. On Sheet 2 "Existing Easements" and Sheet 3 "Easement Notes", the Applicant makes no claim of an existing Road Easement Right for this location.

3) *Irrevocable Offer to Dedicate.* On Sheet 8 of the Tentative Map and in the Specific Plan text the Applicant refers to an "Existing 30-foot Irrevocable Offer To Dedicate" and indicates moving water meters and fences on APN's 129-010-83 and 129-010-84 which are privately owned and outside the Applicant's proposed Subdivision.

An Irrevocable Offer to Dedicate (IOD) to dedicate 30 feet of road easement was offered to the County and rejected for use August 29, 2000 via Subdivision Map TM 18536. The IOD granted and rejected by the County does not fully connect to the east to West Lilac Road. Additionally this IOD probably conflicts with the Covey Land 40 foot Private Road Easement Agreement 79-539700 recorded December 28, 1979.

Accretive does not have legal rights for the "Covey Lane (Pub) road depicted in Sheet 8 of TM5571 RPL 1. The IOD for an approximate 30 feet of road easement is property of the County and Accretive cannot use these rights without resorting County of San Diego assistance, violating a condition previously imposed on Accretive by the County.

There is no valid IOD for the "COVEY LANE (PUB)" as represented by the Applicant on Sheet 8 of TM 5571 RPL 1. If there is a valid IOD, it would be property of the County of San Diego, not the Applicant.

The Valley Center Community Planning Group requests that the Department of Development and Planning Services obtain Certified Legal Easements from the Applicant that enable the 600-foot Covey Lane Public Road consistent with Item

4 in the 2/7/11 Letter MPA 10-25 and release the information for public review in the near future.

4) *Covey Lane Private Road Easement*. Extensive research has concluded that the 40-foot Private Road Easement for Covey Lane was created by Private Road Easement Agreement 79-539700 recorded December 28, 1979, and has not been modified or superseded.

While the Applicant has rights as an "heir or assignee" to this 12/28/79 agreement for properties that he owns, there are eleven other current "heirs and assignees" that would need to grant the Applicant additional rights to use Covey Lane as the Applicant has described in the Specific Plan and represented in the Temporary Map.

Therefore, the Applicant does not have the right to overburden Covey Lane with any traffic from the Applicant's proposed Subdivision, including intersecting Covey Lane with Lilac Hills Ranch Road as proposed on SP page III-6 Item 2 "Private Roads" b) "Off-site Private Road Improvements" i) "Lilac Hills Ranch Road."

The Valley Center Community Planning Group requests that the DPDS obtain Certified Legal Easements from the Applicant for Covey Lane Private Road consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for Public review in the near future.

5) Rodriguez Road – Property Owners have not yet done an assessment of Easement Rights asserted by the Applicant on the Rodriguez Private Road.

The Valley Center Community Planning Group (VCCPG) requests that the DPDS obtain Certified Legal Easements from the Applicant for the Applicant's intended use of Rodriguez Road (Private) consistent with Item 4 in the 2/7/11 Letter MPA 10-25 and release the information for Public review in the near future.

Compliance with the General Plan

The San Diego County General Plan is based on 10 guiding principles. It is difficult to understand why the Lilac Hills Ranch is receiving such serious consideration when it appears to violate each of them. The 10 are:

Guiding Principles

The General Plan maps, goals and policies, and implementation programs are based on a set of ten interrelated principles that provide guidance for accommodating future growth while retaining or enhancing the County's rural character, its economy, its environmental resources, and its unique communities. The ten Guiding Principles are:

1. Support a reasonable share of projected regional population growth.

LETTER

RESPONSE

2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

To anyone who has carefully read the Accretive submission, it appears that they have designed a project that would violate each of these ten principles. Their Specific Plan only purports to address and show consistency with the goals of the General Plan. The project is not located near existing or planned infrastructure, services and jobs in a compact pattern of development (#2). The proposed project is compact only in the sense that 1746 units are compressed into a 608 acre project site which is presently zoned for around 110 units.

The Project certainly does not reinforce the vitality and individual character of the existing community (#3) in the area the proponent has selected. The west of Valley Center is and has long been an area of agriculture and rural homes. The building of schools and homes would take away those uses. The aerial spraying that often accompanies and is necessary for robust plant growth would have to stop if confronted with dense residential development.

The Lilac Hills Ranch Specific Plan does not promote environmental stewardship that protects the natural resources of the region nor ensure that development accounts for the physical constraints of the land. (# 4 and 5). The Project will move 4.4 million cubic yards of earth on a 608-acre site destroying land contours and natural resources and not respecting the physical constraints of the land. Cutting and filling, on average, one and a half cubic yards of earth for every square yard of the project's surface is not a recipe for the Applicant to "integrate, maintain, or preserve" the major physical features of the site nor "preserve natural resources...and enhance connectivity to community development patterns". The results will be to completely disturb and reshape the landscape to suit the high density of housing proposed leaving only narrow corridors for wildlife transit and connectivity.

There is no multi-modal transportation network that enhances connectivity. The project will require its residents to commute to jobs in San Diego or Temecula thereby adding to Greenhouse gases. (#6 and 7) The commercial areas of the development will generate only a small number of low-paying retail jobs and even fewer relatively low-paying senior health/maintenance jobs. Few, if any, of these jobs would be capable of supporting a mortgage on the housing the applicant proposes to build. There will be increased daily trips for these workers as they travel to and from their homes and for residents of Lilac Hills Ranch as they commute to employment centers in Escondido, Temecula, Vista, and Oceanside. The 75,000 square feet of commercial mixed-use space will not provide the array of services and retail opportunities required by a Del Mar-sized town of over 5000 residents. And, that makes this project one that distinctly does not encourage "non-automobile mobility."

The Project certainly will not preserve agriculture having selected as its site one of the richest agricultural regions of Valley Center nor will it minimize public costs of infrastructure and services. (# 8 and 9). Although the Applicant claims in the Specific Plan to have "worked" collaboratively with the Valley Center Community and in fact that "the project was extensively redesigned in response to the comments and issues raised during the meetings and workshops held over the past several years", this is simply not so. To the contrary the applicant has cherry picked supporters and held "private" meetings while specifically excluding those who question the project, some of whom are the community's elected officials. (#10)

The Lilac Ranch Specific Plan raises major questions about the extent to which the County of San Diego values and is prepared to defend its General Plan, 2011.

Services and Infrastructure (Water, Schools, Fire, Waste Treatment)

Lilac Ranch will require virtually all new infrastructure. We have considered roads at considerable length and noted the problems associated with them. Much the same picture applies to schools, water, fire protection and waste treatment.

Schools. It is unclear where students who live in Lilac Ranch will attend school. The Specific Plan notes that there will be an 11.2-acre site on which to build a K-8 school. Despite the claims made by the applicant, there is no Project Facility Availability Form from Valley Center-Pauma Unified School District, Bonsall Union School District, or Fallbrook Union School District attached to the Specific Plan. There is no indication of support from any district for the suggestions made in the Specific Plan.

If a new school was built, none of the three districts has indicated interest in managing the new facility on the Project site. Valley Center-Pauma USD has one school that is presently vacant and so, certainly, adding a remote school site to Valley Center-Pauma would constitute a substantial and unnecessary expense for that school district.

If no school is built in Lilac Ranch Hills, students would either be bussed or transported by parent to existing schools, not only for grades K-8 but also for grades 9-12. Such an arrangement would have an impact on district bussing costs. It would also impact traffic flows through the Valley Center and Bonsall/Fallbrook areas and must be addressed in the traffic study for the Project. It appears that a new school in the project is not sought by any of the neighboring school districts but it would serve to reduce trips across roads ill equipped to handle them. As in other aspects of the project, exactly how primary education will be managed remains unclear and likewise the impacts associated with moving students to schools in nearby communities are undefined.

Fire. The Lilac Hills Ranch Fire Protection Plan relies on the Deer Springs Fire Protection District (DSFPD) and CALFIRE to provide fire protection. According to the DSFPD Project Facility Availability Form in the Appendix of the Specific Plan, there is no fire protection available for the Project for the next five years (the length of time for consideration called out by the form). Further, the applicant has measured the emergency response times from the CALFIRE Miller Station adjacent to the Project. However, that station is seasonally manned and does not have assigned paramedic units. DSFPD says the correct primary response station is Station 2 on Circle R Road which is five miles distant from the primary entrance to the Project, making emergency response considerably longer than the time required by law.

*Water and Waste Water.*¹ The Applicant suggests that the Valley Center Municipal Water District (VCMWD) is able to serve the Project but mentions none of the conditions or limitations contained in the Project Facility Availability Form in the Appendix of the Specific Plan. They cited several conditions that are not specifically addressed in the Specific Plan. The applicant continues to suggest that recycling wastewater for use irrigating landscaping is only a goal but VCMWD has said it is a requirement. The Plan should acknowledge this requirement. The applicant says the Project will supplement recycled water with well water, claiming that 90% of the neighboring properties don't use well water since they are served by VCMWD. However, those neighboring property owners may be using well water as a supplementary source for irrigation of agricultural crops just as the applicant proposes.

¹ The Valley Center Planning Group was notified 22 Oct 2012, that the Valley Center Municipal Water District voted to provide water to the proposed Lilac Hills Ranch project pursuant to the conditions listed in their Project Facility Availability form.

Since the Valley Center Municipal Water District (VCMWD) has indicated that it does not have the facilities near the site to serve the project within the next five years (see Specific Plan Appendix, Project Facility Availability Form – Water), the applicant will have to build new pipelines, treatment and recycling facilities to serve the Project. While LEED 2009-ND allows for such construction, the intention of the standard is to allow it in urban infill areas to extend existing infrastructure. In this case, the new construction is being proposed for a green field, rural agricultural area, which is expressly discouraged by LEED 2009-ND.

Again in this section of the Specific Plan the applicant continues to use equivocating language that suggests recycling of wastewater for onsite irrigation "... could possibly then be used to irrigate all of the common areas, front and rear yards of residential homes and potentially be available as a backup water supply system in the event of major fires." The question becomes, will it happen or not? The language suggests, at the very least, there is much uncertainty whether or not such a system will be in place. However, VCMWD has said it must be in place in order to meet the water demands of the Project.

The Project will not build a wastewater treatment plant during the initial phases of development. The initial proposal was that wastewater would be collected and trucked to an offsite facility for treatment, making it unavailable for use as irrigation water. This procedure would have added numerous daily trips to and from the Project, trips which could go on for a lengthy but undetermined period. The most recently revised map now proposes installing a temporary 26,000 foot (5 miles) four inch (4") force main sewer line where effluent will be pumped from a temporary pumping station in Phase I. The temporary force main will be buried two to three feet below current grade, transiting from Phase I, southerly through the project, across Mountain Ridge and then down Circle R to the Moosa Canyon treatment plant. There is a significant risk to sensitive habitat and streams if there is a break or rupture in the line. The Waste water Treatment Plan and Recycling Facility is currently planned for construction in phase 3. To avoid environmental damage, phase three, or at least the Water Treatment Plant and Recycling Facility should be moved up the priority list for construction.

There are other facilities and services that Lilac Hills Ranch will require— recycling, emergency medical services to name but two—but the pattern of problems is the same. Public agencies are unable to provide the required service within the foreseeable future and the Project is unclear about how it will proceed under the conditions that the Project confronts. These problems are not unexpected in a project that seeks to create so many facilities and services on such a large scale.

Leeds and Sustainable/Walkable communities.

It is necessary for the Lilac Hills Ranch project to argue that they are at least potentially able to qualify for LEEDS certification in order to avoid the General Plan prohibition on Leapfrog Development. The project, placed as it is, miles from the heart of Valley Center, violates General Plan Guiding Principle 2 and General Plan Policy L-1, which defines and governs Leapfrog Development. Leapfrog Development is defined as Village densities located away from established Villages or outside established water and service boundaries. Leapfrog Development standards do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities and that are designed to meet the LEED-Neighborhood Development Certification. The LEEDS-ND 2009 standards are important for Lilac Hills to reach so that it will not be considered (and prohibited) as leapfrog development. The criteria for LEEDS certification are as follows:

• **LEED 2009 for ND Project Checklist:**

- Prerequisite 1- Smart Location
- Prerequisite 2- Imperiled Species and Ecological Communities
- Prerequisite 3 - Wetland and Water Body Conservation
- Prerequisite 4- Agricultural Land Conservation
- Prerequisite 5- Flood Plain Avoidance
- Preferred Locations 10 pts
- Locations with Reduced Automobile Dependence 7 pts
- Housing and Job Proximity 3 pts
- Steep Slope Protection 1 pts
- Site Design for Habitat or Wetland and Water Body Conservation 1 pt
- Long-term Conservation Management of Habitat or Wetlands/ Water Bodies 1 pt

The LEED 2009 for Neighborhood Development web-site says, " *This rating system is designed primarily for the planning and development of new green neighborhoods, whether infill sites or new developments proximate to diverse uses or adjacent to connected and previously developed land. Many infill projects near transit will be in urban areas, which help direct growth into places with existing infrastructure and amenities.*

It is clear from this list of standards and explanation that Lilac Hills Ranch is not truly designed with any of them in mind. Their Specific Plan does claim to be LEED 2009-ND compliant but fails to meet the prerequisites for the first 5 categories of compliance. The quote from the LEED 2009 Neighborhood Development Rating System suggests that the applicant does not understand the requirements for a LEED 2009-ND project. The Smart Location and Linkage prerequisites include smart location, avoidance of imperiled species and ecological communities, wetland and water body conservation, agricultural land conservation and flood plain avoidance. This project fails to meet four of the five prerequisites for a green LEED 2009-ND project. Regardless of how much the

LETTER

RESPONSE

new construction addresses green processes and materials, it fails to meet the basic location requirements.

With regard to the structure of neighborhoods, Leeds guidelines say, *"The neighborhood, as laid out in LEED-ND, is in contrast to sprawl development patterns, which create pod-like clusters that are disconnected from surrounding areas."* The Lilac Hills Ranch Project is characteristic of sprawl development by being proposed for current agricultural lands, making extensive grading alterations that will disturb both agriculture and wildlife, and impinging on wetlands with roads and urban runoff. It's one achieved prerequisite is that it is not proposed for a flood plain. The three pod-like "neighborhoods" of the Project are barely connected in terms of distance and boundaries. Questions regarding roads and transit access make the claim for smart location even harder for this Project to achieve. The Project site is not a preferred location under the evaluation criteria. Many of the other claims for compliance with LEED ND requirements are misinterpreted or incorrect.

The guidelines continue, *"This compact form of development will locate housing close to retail, services, schools, and jobs, allowing for the preservation of an increased amount of open space, natural habitat and agriculture that will contribute to the retention of the rural setting and lifestyle of the adjacent community."* The footprint of the Lilac Hills Ranch project is not compact by any measure. And, rather than preserving more open space, it is doing the opposite by proposing to build with urban density on existing green field agricultural and low density residential land. And, thereby, destroying open-space and the rural setting and lifestyle that it purports to preserve.

The goal of a mixed-use pedestrian-oriented sustainable community is defeated from the start by the stretched, amoebic shape of the Project which extends from north to south for over two miles and from east to west for over three quarters of a mile. Further, the Project is nearly severed near the middle by properties not included in the Project. This shape drives the developer to make three "community nodes" to claim walkability distances of the recommended half mile radius. However, taken together, the Project inhabitants will have to walk well over a mile to get from end to end of the Project. The three commercial nodes for a walkable community would not be necessary if the project area was more regular and compact rather than stretched out and discontinuous.

The two smaller commercial "neighborhood centers" seem intended to address the 'walkability' requirement of the LEED 2009-ND standards. However, neither of these centers will be adequate to satisfy the needs of prospective residents, requiring them to travel, likely by car, to other stores most likely outside the project to a distant commercial zone

The claim that Lilac Ranch Hills augments the area adjacent to I-15 is incorrect. This Project will supplant an existing agricultural/rural residential low-density

usage with a high-density, urban pod development that relates to nothing surrounding it. The commercial/mixed use areas will not provide enough employment or the quality of employment needed by residents to significantly reduce average daily trips. Neither will those commercial areas significantly reduce trips for residents outside of the Project because there will not be the diversity of services needed to accomplish that goal. In the end, this Project fails to balance population, housing needs, open space, agriculture and infrastructure because it attempts to create an isolated urban project with an outsized population density compared to the area now, with only a shadow of an acknowledgement of the present agricultural and open space uses.

There are no circumstances under which the presently proposed project can successfully "incorporate and encourage low impact development and sustainable practices" at the proposed Project site. At every turn, this Project will have tremendous impacts on the current and planned Lilac Triangle agriculture and rural residential uses because its proposed urban structure is inherently incompatible with present uses and development patterns.

The applicant refuses to acknowledge those impacts and instead wants to mitigate them by offering up token patches of orchard and remnant strips of open space. To accomplish this urbanization of the Lilac Triangle, will require the applicant to install urban services onsite, none of which fulfill the intent of low impact and sustainable development practices. *The applicant is planning to build the entire infrastructure needed to support such a large and dense project because none of it presently exists*, a condition that runs counter to the requirements of LEED 2009-ND and virtually all other serious green and sustainable building standards. Those are standards the San Diego County General Plan purports to support. Recycling centers, schools, recreational facilities, roads, and utilities are all the sorts of infrastructure that exist in the County's incorporated cities and are desirable for the kind of infill development that this Project should be. To build new infrastructure for this kind of Project defeats the entire concept of green and sustainable development and makes a mockery of County support for green and sustainable development.

Agriculture

The Project calls the Lilac Triangle an area of "historical agricultural activities" but the chart presented below indicates that Agriculture is flourishing in the area today. The Britsch cactus farm ships rare specimens all over the world and provides high-grade cactus to numerous retail operations. Archie's Acres produces organic produce and trains returning veterans, many of whom have Traumatic Stress Disorder, in organic and hydroponic techniques that provide both therapy and a means of useful employment. Citrus, avocados, tropical plants, proteas and eucalyptus, palms, tangerines, flowers, pomegranates, and orchids all flourish in the area.

LETTER

RESPONSE

Modern technology could enhance agriculture here as well. The remoteness of the area lends itself to solar arrays and wind generation, both quite compatible uses in agricultural area. Grapes for wine—a new industry in Valley Center—could also thrive on the hills and steep slopes of this area.

Without question, it is the intention of the Valley Center Community and the Valley Center Community Planning Group that the rugged, remote and fire prone areas in its western areas should remain as large parcels in agriculture while the core of the town—represented by the North and South Villages—should accept planned development and services.

Lilac Ranch Hills will not augment the area adjacent to I-15. This Project will supplant an existing agricultural and rural residential low-density usage with a high-density, urban pod development that relates to nothing surrounding it. It will have tremendous impacts on current and planned Lilac Triangle agriculture and rural residential uses because its proposed urban structure is inherently incompatible with present uses and development patterns. Why should area farmers give up their livelihood to allow a high density, high impact project? Why should taxpayers support the creation of new infrastructure built almost from scratch that destroys the areas natural features?

The map below, painstakingly created by a Valley Center resident marks with pink and yellow flags many of the areas of active agriculture in and in the immediate vicinity of the Lilac Hills Ranch project. There are more than 100 of them that range from small family businesses to major commercial agricultural enterprises. Following the map is a list the growers currently active in the area of Lilac Hills Ranch



LETTER

RESPONSE

Location	Agricultural Product	Owner/Business Name
1	Cactus	Britsch - Western Cactus
2	Avocados	Purdy
3	Lemons/Avocados	Covey Farms
4	Avocados	Accretive
5	Figs	Padilla Guadalupe
6	Cactus	Richard Thompson
7	Avocados	Accretive
8	JR Organic Farms (Produce)	Accretive
9	Flowers	
10	Avocados	
11	Proteas	Accretive
12	Worm Castings	
13	Flowers	LaChapelle
14	Avocados & Palms	
15	Wholesale Nursery & Green Houses	
16	Flowers	
17	Avocados	
18	Cactus	Far West
19	Cactus & greenhouses	Altman Plants
20	Avocado Groves (very large grove)	
21	Avocados & citrus	
22	Avocados (Calavo growers)	
23	Avocados	
24	Cactus & succulents	
25	Tropical Plants	Ben's Subtropicals
26	Proteas & Eucalyptus	
27	Greenhouse - succulents	
28	Flowers	
29	Avocados & citrus	
30	Organic Produce & Hydroponic G.H.	Archies Acres Farms
31	avocado	
32	palms (shade cloth greenhouses	
33	avocado/citrus	
34	citrus	
35	king palms	
36	avocados	
37	avocados	
38	succulents & green houses	
39	tangerines	
40	avocados	
41	citrus	
42	avocados	
43	avocados	
44	flowers	
45	JR Organic Farms (Produce)	

LETTER

RESPONSE

46	greenhouses	
47	avocado, citrus & flowers	
48	avocados	
49	avocados & kiwis	
50	avocados	
51	avocados	
52	avocados	
53	produce	
54	flowers	
55	avocados	
56	flowers	
57	produce	
58	avocados	
59	avocados	
60	avocados	Kamp Kuper Youth Retreat Ctr.
61	avocados	
62	pomegranates/avocados	
63	cactus/green houses	
64	Avocados/pomegranates/ loquats	
65	avocados	
66	avocados	
67	pomegranates	
68	palm nursery	
69	avocados	
70	avocados	
71	Wholesale Nursery	
72	Palm Nursery	
73	Eucalyptus	
74	avocados	
75	avocados	
76	avocados	
77	palm nursery	
78	green houses	Euro American
79	avocados	
80	avocados	
81	avocados	
82	avocados	
83	palm/cactus/ornamentals	Poncianos nursery
84	avocados	
85	avocados	
86	avocados	
87	avocados	
88	avocados	
89	avocados	
90	avocados	
91	avocados	
92	avocados	
93	quarry (rocks)	

94	avocados	
95	palm nursery	
96	orchids	Reids Orchids
97	flowers	
98	citrus	
99	citrus	
100	avocados	
101	Sunnataran Residence	Retreat

Twists of meaning and lack of clarity in the plan

As is apparent from what has already been presented, The Lilac Hills Ranch plan is not what it purports to be. Arguments the plan advances seem to assume that making an assertion gives it truth. They talk about “sustainability”, environmental sensitivity, being compatible with the surrounding community, preserving significant portions of the existing on site resources, being a LEEDS-ND community, being compatible with the San Diego County General Plan’s ten guiding principles. Close examination of what they actually intend to do makes it clear that what they say and what is actually planned are quite different.

For example, the Plan says, “*The overall objective is to provide an environmentally sensitive, residential community compatible with the character of the surrounding area while preserving significant portions of the existing on-site sensitive resources, including eighty-five percent of the wetlands in open space easements.*” (See p. 41, ll-3) This statement is absurd given the degree to which the applicant intends to modify the environment and character of the area (from agricultural and natural to urban; from rolling hills and steep slopes to artificial contours; from one dwelling unit per 2,4, & 10 acres to as many as 8.8 dwelling units per acre.)

Quoting from the General Plan that “sustainability is a key theme” and making that a goal of the Project merely mouths the words without delivering a design that addresses sustainability for a rural, agricultural site.

They argue that adding 1746 homes and 5,000 residents to a rural back country area will improve traffic and they take as part of their planning for circulation, roads that they have no entitlement to use.

While the material that has been released indicates that there will be 1746 homes, there will also be 200 patient beds in the Assisted Living Facility—which will be *in addition to* the 1746 units. These beds will have a significant impact on traffic because of visitation, staff and deliveries.

They distort their claims when distortion is helpful to the argument. They claim, for example, that the project site is one-half mile from the I-15 without noting that

LETTER

RESPONSE

road construction along the route the crow files is impossible because of a mountainous ridge which would make any road that accessed the I-15 *considerably* longer than ½ mile.

They talk about a “walkable village” when the site spreads over two square miles and requires three retail nodes in order to be even remotely walkable. The applicant has taken the position that such an oddly shaped and sized Project is “compact” and “efficient”. But this is merely the kind of false speak that attempts to misdirect attention from reality

The applicant is planning to build the entire infrastructure needed to support such a large and dense project because none of it presently exists, a condition that runs counter to the requirements of LEED 2009-ND and virtually all other serious green and sustainable building standards. Yet they claim to be LEEDS 2009 ND compliant.

The Project will generate only a small number of low paying retail jobs and the 75,000 square feet of commercial mixed use space will not meet the community’s shopping needs. The Project, counter to the assertions of Lilac Ranch Hills planners, distinctly does not encourage non-automobile mobility.

There are also problems with the slope calculations that are contained in the Specific Plan.

• **Land Use Plan** – As can be seen in the slope map below, the



assertion by the applicant that the Project site consists of "gentle topography" and that "97.6% of the property is less than 25 percent slope per the Resource Protection Ordinance (RPO) steep slope calculations" is incorrect and must be recalculated by County staff. Slopes that are mapped with 10 foot contours show many fewer 25% slopes than do County Standard slopes and this is exactly what Lilac Hills Ranch Planners have done.

Beyond concerns expressed here about what we have been told, there are issues of concern in the information that has yet to be supplied. We have mentioned the lack of a Traffic study, which is critical to understand the roads, but much else is missing. For example, we have not yet seen a Soils Report. There is the potential for blasting on the site that will last for an undetermined period of time (Will it be 6 days or 6 months?) Given that this area has granite rock, putting substantial amounts of silica into the air has serious health implications. The Soils Report will help determine the impact of moving 4.4 million cubic yards of material. It is important to identify the soil material, understand how it will be distributed, blasted or placed and to determine compliance with County Grading Standards.

How will grading be phased and balanced? Is imported material needed to complete the grading project? If so, what material will be brought to the site and where is it coming from? Letters of permission to grade appear to be identified but not yet obtained, which means final grading and impacts on adjoining

LETTER

RESPONSE

properties have not yet been identified and it is difficult to determine if changes will need to be made to the plans. We ask the applicant to provide grading plans to show finished grade elevations.

What is the life of the temporary sewer pump station and the end date of its use? Due to phasing, it is possible that the temporary sewer pump station and force main could be in place for years before a permanent facility is brought on-line and the temporary line removed. The Force Main sewer line is approximately 26,000 feet (5 miles) at a depth of 2 to 3 feet below existing grade. How does this relate to phased grading? How does this relate to open spaces and other sensitive areas etc.? The Valley Center Community Planning Groups asks that the County provide construction plans for the force main sewer line.

When will Sewer Treatment Facilities be built and in what phases? (Typically all must be installed and operating with finished roads before homes can be built). Answers to these concerns are important in that the force main could be in place for years before building a treatment facility. We should be able to see that treatment plant will be built in an appropriate phase and time.

How will migratory corridors be maintained? Please identify blue line streams, vernal pools and habitat.

Because of the Porter – Cologne Act (California State Water Control Protection Act) we are requesting the SWPPP (Storm Water Pollution Prevention Program) plan and an explanation of how it relates to all phases of development. We would also like to see plans for compliance with the Porter-Cologne Act, NPDES (National Pollution Discharge Elimination System), RWQCB, AQMD and SWPPP.

Please provide both wet and dry utility plans along with offsite and onsite plans and identify wells that will be used in conjunction with the wet utility plan.

Conclusion

This is the wrong location for this many homes.

It will create an urban traffic gridlock area. It will destroy agriculture and sensitive ecological habitats. It borders rural lands and is within 1 ½ miles of the Rancho Lilac Conservation Area recently purchased by the state of California for Habitat Destruction Mitigation.

The cost of providing infrastructure in this remote region with challenging topography is economically infeasible for the developer. In order for this development to proceed, it will require large public subsidies in the form of county sponsored long-term financing, infrastructure financing districts (IFD) or assessment districts (AD). These financing methods shift the cost of direct development impact to other area residents or to the county at large.

LETTER

RESPONSE

On page IV-12, Item 3 of the Specific Plan the applicant makes the statement that no one outside the development will pay for Lilac Hills Ranch infrastructure improvements. The applicant then enumerates an itemized request in Table 8 for a very large helping of public subsidies in this version of the Specific Plan, strongly telegraphing that this development is not economically feasible if the developer has to pay for his direct development impact

The proposed development is not in the best interests of the citizens of San Diego County.

Appendix A – Road Capacity- SANDAG Mixed Use Trip Generation Model V4 for Average Daily Trip (ADT) Generation

Section 3 - Trip Generation

	Quantity	Units	Trip Equation Method (if applicable)
Residential			
Estate, Urban or Rural		DU	
Single Family Detached	1400	DU	
Condominium	346	DU	
Apartment		DU	
Mobile Home (Family)		DU	
Retail			
Super Regional Shopping Center		ksf	Average Rate
Regional Shopping Center		ksf	Average Rate
Community Shopping Center	85	ksf	
Neighborhood Shopping Center		ksf	
Specialty Retail / Strip Commercial	0	ksf	
Supermarket		ksf	
Drugstore		ksf	
Bank with Drive-Thru		ksf	
Discount Store		ksf	
Restaurant			
Quality		ksf	
Sit-down, High Turnover	0	ksf	
Fast Food (With Drive-thru)		ksf	
Fast Food (Without Drive-thru)	0	ksf	
Delicatessen (7 AM - 4 PM)		ksf	
Office			
Standard Commercial Office	0	ksf	Fitted Curve
Large Commercial Office		ksf	Fitted Curve
Office Park		ksf	
Single Tenant Office		ksf	
Corporate Headquarters		ksf	
Government (Civic Center)		ksf	
Post Office (Community, w/mail drop lane)		ksf	
Medical-Dental		ksf	
Industrial			
Industrial / Business Park (with commercial)		ksf	
Industrial / Business Park (no commercial)		ksf	
Industrial Plant		ksf	

LETTER

RESPONSE

	Manufacturing		ksf	
	Warehousing		ksf	
	Storage		ksf	
	Science Research & Development		ksf	
Lodging	Hotel (w/convention facilities, restaurant)	20	Occ. Room	
	Motel		Occ. Room	
	Resort Hotel		Occ. Room	
Misc. Uses	Movie Theater	0	seat	
	Religious Facility	7.5	ksf	
	Gas Station (w/Food Mart and Car Wash)		Pump	
	Hospital	20	Bed	
	Convalescent / Nursing Facility	200	Bed	
	Library		ksf	
	Park (developed with meeting rooms and sports facilities)	25.5	acre	
	Transit Station (Light Rail with Parking)		occupied pkg space	
	Park & Ride Lot		occupied pkg space	
Education	University	210	Student	
	Junior College	125	Student	
	High School	349	Student	
	Middle / Junior High	165	Student	
	Elementary	708	Student	
	Day Care		Student	
		Daily	AM Peak Hour	PM Peak Hour
Trips from Land uses not covered above ==>		2860	0	0
Jobs in those Land Uses		0		
		Daily	AM Peak Hour	PM Peak Hour
Total "Raw" SANDAG Trip Generation Trips		31,442	2,460	2,802

LETTER

RESPONSE

EXHIBIT 2

DEIR Public Comment Letter dated August 13, 2013 from Kevin K. Johnson APLC re:
Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan
PDS2012-3800-12-001(GPA),PDS2012-3810-12-001 (SP)-**General Plan and
Community Plan Inconsistencies**

Valley Center Design Review Board

February 25, 2013

TO: Mark Slovick, Larry Hofreiter, Jarrett Ramaiya, Kristin Blackson, Beth Murray and Mark Wardlaw
San Diego Department of Planning & Development Services
CC: Oliver Smith, Ann Quinley, Steve Hutchison, Margarette Morgan
RE: **Accretive Investment Group's 2nd revised submission (02-13-13)**
GPA12-001, SP-001, Master Tentative Map 5571, Implementing Tentative Map 5572

Why is this applicant permitted to abuse the process?

Ordinarily we appreciate the opportunity to comment on projects that are being proposed for our community. We are accustomed to working closely and amicably with real estate developers, especially of Village projects, to develop plans that reflect the community's vision. We very much look forward to the completion of Village projects in Valley Center's central valley which have been planned for many years. This is the traditional heart of Valley Center where businesses, churches, schools, playing fields, and library are located, where very significant road infrastructure improvements were completed several years ago at a cost to the taxpayers of some \$50 Million, where wastewater treatment facilities are located and low-interest state loans have been secured for expansion. Here Village residential and commercial development will be welcomed.

In glaring contrast, we are deeply disturbed and alarmed by this project and this application. Review after review of a proposal that fails repeatedly to respond to previous comments seems to be design to demoralize the staff and discourage community participation.

This project is a sad anomaly that continues to disappoint citizens who care deeply about our community. Though the applicants claim to have "worked with the community", in fact they have done whatever they can behind the scenes to undermine what state law defines as the "constitution of land use" and what tens of thousands of San Diego County citizens understand and depend upon as a kind of contract with our County government -- our County General and Community Plans. These applicants share San Diego County with hundreds of thousands of citizens who are invested in the region's plans for the future and who benefit collectively by a common set of rules. What encourages and then allows this applicant to bull and bully its way past procedures that everyone else follows? From the get-go this applicant has gamed the system, disregarded the processes and products of public planning, misrepresented basic and essential facts, ignored input and correction. On and on it goes, seemingly endless deviations from standard protocols are tolerated. From the sudden appearance of a surprise Specific Plan Area on Valley Center's land use maps in 2008, through the Planning Commission's approval of the PAA application (against staff's recommendation AND contradicting the Commission's unanimous endorsement of the General Plan Update just weeks before), and now to this 2nd iteration -- the review process has been corroded and frustrated. Why is this applicant permitted to abuse the standard process, and what will become of San Diego County when we all abuse the system similarly?

Concerning this submittal and the process:

Except for increasing commercial square footage (75K SF to 90K SF, increasing hotel beds (20-50) and adding kitchenettes to 200-units in the group home facility (more intensity, not less) and a few minor changes -- this submission is unchanged from the previous submission and the one before that; and, again,

it is incomplete. This submission lacks details that have been requested in the past; it also lacks a letter from the applicant which, according to County protocol, is required to explain how the new submission addresses the Project Issue Checklist. (The Project Issue Checklist is the 364 page document, prepared by the PDS staff and released in December 2012, which lists more than 1000 items that the applicant needs to address.) Without this letter one can only guess whether the applicant is misunderstanding, overlooking, ignoring, or merely defying the issues that have been raised several times already by staff and community groups.

Nevertheless, despite missing pieces, community groups have been given 30-days to review the material and submit comments to the County. At the same time, evidently, the applicant has been given a 60-day extension to submit the Project Issue letter and has submitted "some studies" for the staff to "preview". Information about which studies have been submitted is not being made available to the community. Nor can anyone predict, obviously, how these will be assessed and what revisions may be requested by staff after they have been previewed. As a result of these considerable uncertainties, several of us suggested that formal community review should be delayed until the resubmission is complete rather than pushed forward with so many missing pieces. We were told accommodatingly that we could submit our comments anytime – but within 30-days if we wanted our comments to be included in staff's comments. Given the infamous "one-bite policy" and the fact that this project threatens to set aside Valley Center's entire community plan, volunteers who are reviewing this project on behalf of the community feel that we cannot risk being told in a few months that we had a chance to comment – and chose not to. So we are complying with the 30-day deadline even though compliance requires volunteers to drop everything, hold special meetings and respond immediately to yet another incomplete submission, and do it all over again in 60 days. All this is to accommodate an applicant who requires one extension after another, who is also unresponsive to staff and community comments and ignores County protocol.

This said, after reviewing the Specific Plan text and maps which show zero effort to remedy the project's basic problems, it's hard to imagine what a Project Issue Letter from this applicant might add (more frosting on a missing cake?) We will all have to wait for the long-anticipated "studies" to understand the substance of the applicant's plan for this property. At this point, issues we raised in September 2012 and the previous June 2012 all remain unaddressed.

In addition to our previous concerns, which are attached, we emphasize the following:

SPECIFIC PLAN

The Specific Plan text is still riddled with wiggly information and assertions that are contradicted by the facts. This creates a confusing stew: information too vague and mutable to assess, indecipherable nonsense, and plain misrepresentations of the truth – all dangerous in a serious planning document. A Specific Plan is not a sales pitch. It is a proposal to amend and then to implement the San Diego County General Plan. This particular Specific Plan will govern the development of an entire new city of 5000-people. This proposal DOUBLES the growth planned between now and 2020 for the entire 55,000 acre planning area. According to SANDAG's Regional Growth Forecast Valley Center adds 989 homes between 2010 and 2020. The Accretive project alone proposes twice that on just 608 acres: 1746 homes, a 50-bed hotel, a 200-unit (bedrooms & kitchenettes) group care facility and 90,000 SF commercial.)

Vague and inconsistent particulars are too numerous to list. As every reviewer has exclaimed, there is no definitive plan beyond the plan to explode the development potential of this rural area by more than 1800%. Design vignettes and "conceptual" layouts are meaningless substitutes for genuine design

standards and a commitment to a specific approach. Even unit allotments for each phase are subject to change. Virtually the entire "masterplan" is one concept that is subject-to-change laid over another concept that is subject-to-change. Nothing about this project is clear except the statement that this nebulous Specific Plan will prevail over every official County planning document. Processing should be halted until the Specific Plan is, at least, complete, factually correct and internally consistent. It is none of these.

The plan is laced with ludicrous claims, misrepresentations and outright inaccuracies, again too numerous to detail here. However, to assist the fact checkers, the whoppers are most pervasive in sections that pertain to community character, both the character of the proposal and the character of other properties in the area. Perhaps because "consistency" with legal planning documents and "compatibility" with existing and planned development on the ground is, one would hope, requisite for approval of this proposal, the applicant persists in these claims whether or not they make any sense. For example:

1. MIS-CHARACTERIZATION OF EXISTING SPECIFIC PLAN AREAS IN VALLEY CENTER

Page I-10, Section H, 1st paragraph

ASSERTION: *"the Valley Center planning area has a number of existing specific plans ... containing large scale urban development"*. This is not true. Specific Plans in VC have a minimum of 40% open space and, with the exception of a section of Orchard Run, are built or clustered at Semi-Rural densities. The VC Community Plan lists the facts of these 7 Specific Plans:

1. Lilac Ranch: permanent open space preservation
2. Circle R Resort: recreational community on 361 acres. Density 1 du:2ac clustered.
3. Live Oak Ranch: 307 acres. 40% preserved in open space. Clustered 1du:1ac minimum lot size
4. Ridge Ranch I: 138 acres, 25 homes. 1 du: 5acres
5. Ridge Ranch II: 687 acres, 108 homes. 1du: 6 acres
6. Woods Valley: Village golf course community on 437 acres. 40% preserved in open space. Clustered 1du:min 1/2 acre
7. Orchard Run: Village core community on 118 acres. Minimum 40% open space. Density from 1.5 du:ac to 7.3du:ac

2. MIS-CHARACTERIZATION OF SURROUNDING RESIDENTIAL DEVELOPMENT PATTERNS

Page I-10/11 2ND paragraph

The applicant claims that a Metroscan analysis *"documents a robust diversity of parcel sizes"* within a five mile radius of their site. This "study" misses the mark completely and comes to a preposterous conclusion that a drive through the area would reveal. The study overlooks hundreds of acres of open space that characterize the resort and recreational communities along Old 395. These are not spot-zoned urban enclaves as the applicant's study mis-concludes, but are mainly recreational destinations that advertise their country settings, recreational amenities, wildlife and so forth.

1. Circle R Resort: recreational community on 361 acres. 118-acre golf course. Homes clustered. Underlying density 1 du: 2 acres.
2. Lawrence Welk Resort: vacation resort on 600-plus acres. 326 vacation villas. Two 18-hole golf courses, 8 swimming pools, 5 recreational areas, small retail area to serve vacationing guests.
3. Champagne Lakes RV Resort: RV vacation resort on 50 acres. RV campsites. The resort website says, "The resort is 50 acres of nature and wildlife preserve with 3 lakes that are fed by the local mountain streams. Wild ducks and geese have made these lakes their homes for over 40 years."
4. Lake Rancho Viejo, which IS a Fallbrook CPA residential community on 469 acres, allows an overall density of 1.48 dus:ac. Flood plain and uplands are preserved open space.

3. MISCHARACTERIZATION OF THEIR OWN PROJECT

Assertions about their project are not supported and, in many cases, are contradicted by the applicant's own plan. For example: The assertion that "natural landforms remain" is ludicrous when 4 MILLION cubic yards will be graded, and 20% of that blasted. (For comparison, 4,000,000 cubic yards of dirt is just shy of the amount of concrete in Hoover Dam, enough to build a 2 lane road from Seattle, Washington to Miami, Florida or a 4 ft. wide sidewalk around the Earth at the Equator.) Nothing could be less "natural" than grading and compacting 80% of the site, creating 20-30-foot cut/fill slopes (two and three stories high) and lining streets with row upon row of identical symmetrical lots.

More than 80% of the site will be bulldozed, blasted, stripped of organic material, compacted and covered solidly by development; the narrow ribbons of biological open space (less than 20% of the property) that lace through the blasted, bulldozed "natural contours" will be massively impacted: 265 acres will be covered in home sites, 75 acres in "manufactured slopes", 83 acres in asphalt, 40 acres in facilities, a mere 23 acres in parks (see #4).

This is a from-scratch city with MORE HOMES, PEOPLE AND CARS than the City of Del Mar on HALF THE LAND AREA. (City Data: Del Mar: 1.8 square miles, population 4224. The Accretive project: .95 square mile, population 5063.) The project is NOT in accord with the General Plan Community Development Model as the applicant claims. Quite to the contrary, the project defies the General Plan and corrodes its integrity. The applicants propose to explode a 608-acre city in the middle of the rural countryside without adequate feathering or buffering to soften impacts on neighboring farms, rural estates or even biologically sensitive creek beds.

The site is NOT COMPACT, as the applicant claims. It stretches two miles in each direction, with some 8 miles of edge effects. The project is NOT WALK-ABLE, the sprawling configuration of the Accretive site requires the design of three separate Town Centers to justify the contention that this is a pedestrian community; it is an automobile-dependant community. The project quite obviously does NOT meet the most basic location criteria for LEED Neighborhood Development. This is NOT an in-fill site with existing infrastructure; this is a rural site. Building 1746 homes here quite obviously does NOT reduce the need to build and operate new road networks, emergency and law enforcement facilities, libraries, schools, parks and other public services; it CREATES the need to build all of these on green fields that are many miles from jobs, transit, shopping, churches, movie theaters and other accoutrements to support a population of this size. The project does NOT reduce development impacts or reduce traffic trips; it creates devastating impacts and adds thousands of cars to rural roads. The site plan does NOT integrate development into the natural features of the property; it obliterates the natural features of the property. Moreover this project's edge effects will cause the destruction of about 2000 acres of rugged, remote and rural property where hundreds of families have invested in a rural quality of life.

Absolutely NOTHING of the natural site or the rural lifestyles of the people who live there will remain. The applicant needs to quit claiming otherwise. The project requires extremely significant amendments to the General Plan and to the Valley Center and Bonsall Community Plans because it completely overturns these public visions. Period.

4. PARK AREA FAILS TO MEET THE COUNTY STANDARD

The County standard for parks per 1000 residents is 10 acres of local parks, and 15 acres of regional parks. This project seems to provide 23 acres for 5063 people, less than half than the standard, and in an area where very dense development requires MORE parks, not less. Phase 1 of this project (350

houses/1000 people on 62 acres) requires 10 acres of parks, it has 3.2 acres; Phase 2 (466 houses/1351 people on 36.3 acres) requires about 15 acres of parks, it has 3 acres ... and so forth.

A point quite minor in the context of everything else: there are no proposed tree/plant species listed for "Parks" in either the Conceptual Landscape plan or the specific plan text, even though there are symbols and a proposed layout.

5. PREEMINENCE OF THE COUNTY GENERAL PLAN

The Specific Plan states on page II-2 that, in the case of conflicts or discrepancies between the Accretive project Specific Plan and the County's General Plan, the Valley Center and Bonsall Community Plans, and County development regulations and zoning standards, the Accretive Specific Plan will prevail. State law requires consistency across these documents, there should be no "conflicts or discrepancies". A Specific Plan is required by law to implement the General Plan and Community Plans, and cannot "prevail" over them. This language should be revised for its inconsistency with state law while the entire Specific Plan should be purged of marketing braggadocio and revised as a serious planning document to reflect its proper place in the hierarchy of legal planning documents.

6. AUTHORITY OF VALLEY CENTER DESIGN REVIEW

References to the "authority" of Valley Center Design Review are splayed through the Specific Plan, most prominently in Section III. We believe that this Village project is subject in its entirety to Valley Center Design Review and Valley Center's Design Guidelines based upon the information in the Introduction of the Guidelines themselves, the content of the booklet overall and the fact that the VC Design Review Board has reviewed every commercial, industrial and residential project that has been proposed for the North and South Villages. We have worked closely with developers of these areas for more than ten years. Although residential development on Semi-Rural and Rural parcels outside our "Country Town" (now called "Village") area is NOT subject to Design Review, planned residential development proposed for our Village areas has always participated in design review in accord with our understanding that Village design is the intended focus of the County design review program.

The Specific Plan text also asserts or implies in several places in Section III that Valley Center's Design Guidelines will also be replaced by the applicant's Specific Plan. This applicant's Specific Plan requires considerably more attention to design, and more elaboration of standards for this particular project, for this Specific Plan to merit authority. The entire planning and design community recognizes the importance of forethought and thoughtful design to the functioning of even the tiniest place, let alone an entirely new city. Again, the content of this Specific Plan is severely inadequate to perform this responsibility.

Our previous comments still apply and are attached.

Respectfully,
Lael Montgomery
Robson Splane
Susan Moore
Jeff Herr
Keith Robertson

Valley Center Design Review Board

October 15, 2012

TO: Mark Slovick, Jarrett Ramaiya, Rich Grunow, Mark Wardlaw
San Diego Department of Planning & Development Services

RE: **Accretive Investment Group revised submission (09-25-12)**
GPA12-001, SP-001 Master Tentative Map 5571, Implementing Tentative Map 5572 and respective grading plans.

The Valley Center Design Review Board met on October 9, 2012 to again discuss Accretive Investment Group's proposal for the West Lilac triangle in light of September's revised submission. We were disappointed that neither the applicant nor the political consultant, Chris Brown, attended the meeting because the DRB Chair had expressly invited Chris Brown to present the revisions.

Comments Focus on Macro Planning Issues:

The revised submission fails to remedy the basic problems with the proposal which we addressed in our comments of June 14, 2012, which are attached below. Therefore, our comments continue to focus on macro development issues.

- 1) This is still an urban project in a rural area.
- 2) The proposal fails in the same basic and essential ways as the previous submission to respect Valley Center's rural character and its most fundamental design principles.
- 3) New sections describing lot, architectural and landscape design follow the same pattern.
For example:
 - a. "Conceptual Architectural Elevations" shown are generic in nature and have no relevance to the site, its surroundings or to the community in general. Pages 25-37 of the Valley Center Design Guidelines specifically incorporate the design principles of Early California Architecture which reflect the character of the state's early missions and adobes. None of the proposed elevations reflect any of these design principles.
 - b. Lot designs, also generic and out-of-context, ignore both spirit and letter of Valley's Center Guidelines and depict exactly the monotonous development that Valley Center wants to avoid.
 - c. Landscape design is uniform and urban; species selected are ill-advised in some cases for particular locations (eg. fruit trees for road edges and medians) and in other cases for Valley Center microclimates.
 - d. The proposal further ignores requirements for private open space in accordance with the County of San Diego Zoning Ordinance Section 4915: a minimum of 200 square feet per dwelling. Further, the design recommendations call for private open space on the ground to be a minimum of 10 feet in length and width and should be screened from public view by landscaping, a wall, privacy fence or other acceptable method. None of the proposed configurations meet this requirement.
- 4) The proposal provides no evidence that the project is necessary: the new County General Plan already accommodates more growth than SANDAG projects for 2030. There is no demonstrated need for increasing the capacity of the new GP by building a new city many miles from existing infrastructure and services. The proposal fails to justify a change of GP Regional Category from the largest SEMI RURAL parcels (SR-10 and SR-4) to VILLAGE densities as high as 27 dwellings per acre; a 1587% increase in dwelling units (from a total of 110 units allowed under the current GP to 1746).

- 5) The Master Planning approach avoids showing the locations and relationships of residential lots, interior streets and other elements of the site design. This also avoids revelation of site development issues that should deeply concern decision-makers as they consider such extreme and precedent-setting transformation of this rural property. Out-of-sight = out-of-mind looks to be an overall strategy for this application.
- 6) The Master Planning approach coupled with GP Policy LU-1.8 (which the applicant cites to argue that densities can be transferred across land use designation boundaries) make the entire proposal, first, too vague and, second, too mutable to take seriously. This application is a one-way street that asks unprecedented density increases for – what exactly? What IS specific about this Specific Plan?
- 7) The applicant's political consultant insists that "Master Planning happens all the time" and that this project is "the same as the 4-S Ranch project". However, fundamental differences are obvious: the 4-S Ranch project was CONSISTENT with General Plan Regional Categories, Goals and Policies, and Land Use, Mobility and Conservation Elements. 4-S Ranch was inside the existing Current Urban Development Area (CUDA). This urban project proposes – for the sole benefit of a single private real estate speculator/developer – profound revisions of County public planning policy as well as the complete transformation of the rugged and rural countryside.
- 8) **The proposal is riddled with Orwellian "doublethink"** and other convoluted logic. (Orwell defines "doublethink" as accepting two mutually contradictory ideas or beliefs at the same time).
A few examples are:
- destroying agriculture conserves agriculture;
 - adding 1746 homes/ 5000 residents to back-country roads improves traffic;
 - "compact" urban development of this rural area allows for increased open space and natural habitat;
 - grading 4 million cubic yards of dirt respects natural landforms and preserves natural resources;
 - pronouncing the Accretive site a "Smart Location" under the LEED ND Certification Program when the project will actually *BUILD* the "Nearby Neighborhood Assets" that LEED ND certification requires as a pre-requisite. (By this logic LEED ND criteria can be manipulated to justify urban development of any Semi-Rural location.)
 - insisting that the Accretive GPA/SPA is in accord with the GP Community Development Model simply because their context-free development plan is a New Urbanist design. (Again, by this logic, new cities can be plopped into any Semi-Rural or Rural area – NOT what most stakeholders believed was the intention of the new San Diego County General Plan.)
 - (*And, incredibly for a GP Amendment that seeks to overturn the last 12 years of work on the parts of hundreds of planners, residents, and property owners to create the new San Diego County General Plan*) ... calling on "General Plan Consistency" to declare that Valley Center and Bonsall Community Plans cannot be allowed to interfere with the applicant's audacious ambitions to re-write them!
- 9) **The proposal is also rife with errors, distortions and/or misrepresentations.**
A few examples are:
- Claiming that Lilac Ranch and Circle R both are consistent with the proposal's Village densities. Both are, in fact, inconsistent. Lilac Ranch is permanent conservation land and Circle R is a CLUSTERED Semi-Rural project (underlying residential density is 1du:2 acres);
 - Slopes mapped with 10-foot contours reveal significantly less coverage in 25% slopes than County standard contours;
 - Claiming that the project site is ½ mile from the I-15 without citing that road construction along the route the crow flies is prohibited by a mountainous ridge;

- d. Touting "walkable" design when the project site jigs and jags across two square miles and requires three retail nodes in order to claim "walk-ability." More than half the homes, including Senior and Assisted Living neighborhoods, are a mile and a half from the Village Core. This is an automobile-dependent community.
- e. Asserting "compact development" when edge-effects of this sprawling configuration impact adjacent rural properties for a distance of some 8 miles.
- f. Extolling "planning collaboration" with the Valley Center community. This is an overreach that abandons reality in order to invent points toward LEED ND certification. For several years the Accretive Investors have held, not community meetings by any stretch of the term, but closed "private" meetings with cherry-picked supporters. Meetings have pointedly excluded, sometimes disinvented, folks who have voiced opposition to the project, particularly those people who are most familiar with County planning history and the rationale underlying the new General and Community Plans.

Contained in the 82-pages of the Valley Center Design Guidelines are numerous diagrams and sketches, as well as lengthy descriptive copy that make all of these points, and others, quite clear. The Design Guidelines themselves are meant to work together to produce an integrated, whole objective. They cannot be cherry-picked and also produce their intent.

As in any "design", success is a result of combining the right design elements in the right way – in the right place. This project appears off the mark on all counts.

Our comments dated June 14, 2012 continue to apply. Please refer to them, beginning on the next page.

The Valley Center Design Review Board
Lael Montgomery, Chair
Jeff Herr
Susan Moore
Keith Robertson
Robson Splane

Valley Center Design Review Board

June 14, 2012

TO: Mark Slovick, Rich Grunow, Jarrett Ramaiya, Jeff Murphy
San Diego Department of Planning and Development

RE: **Accretive Investment Group GPA 12-001, SP 12-001, Master Tentative Map 5571, Implementing Tentative Map 5572 and respective Grading Plans**

1. Insufficient Detail

The applicant has submitted maps and documents that lack sufficient detail for the group to understand any the development plan for this property. Further, there has been no presentation of the project by the applicant; as a result the most basic facts of the development plan remain murky.

The applicant has filed this GPA/SPA much earlier in the project-development process than developers who have co-developed their plans through community meetings before filing a GPA or an SPA. Therefore, we are accustomed at the point of application to having much greater familiarity with a project, and to the provision in the application documents of considerably more detail.

Neither the DRB nor the Planning Group has worked with this applicant in the way we have worked with the developers of the North and South Village where the land uses proposed have been in accord with the community plan, which is not the case with this project. We received a copy of the Specific Plan Text on Tuesday 6/5/12. Chris Brown encouraged the group to take more time with our review and comments on the text. (He said he is requesting an additional 30-45 days from the County.) However, from a cursory reading, the SP Text fails to provide sufficient additional substantive information to warrant any delay.

Considerably more detail about the overall development plan is necessary. We understand from the County planner, Mark Slovick, and from the developer's consultant, Chris Brown, that there will be revised iterations of the project. More detailed comments will come in response to more detailed plans.

2. Focus of Comments.

Our comments at this time are focused in areas which are pre-requisite for any development proposal to meet Valley Center's community character objectives.

3. Project Undermines the Vision for VC.

DRB members believe that this project fails in basic and essential ways to respect Valley Center's rural character and its most fundamental design principles. If approved, this General Plan Amendment would upzone this property by about 2000% to allow 1746 dwellings and three commercial areas. The Regional Category would change to Village from its recently-approved GP Regional Category of Semi-Rural which allows approximately 350 homes on 2, 4 and 10 dwellings per acre.

The imposition of an artificial "village" in Valley Center's rural countryside dismantles the community's recently-approved Community plan. County planners along with Valley Center residents, property owners and developers have invested hundreds of hours, and extensive public and private resources to create the VC Community Plan, and to plan the private Village development to support it. This work was approved by

the Board less than a year ago. VC's plan is a two-part growth strategy: first, 25% of the future growth is compact "infill" development of two existing Village "nodes" in the central valley along Valley Center Rd; second, residential density feathers from the village core to Semi-Rural and Rural designations in remote, hilly, fire-prone areas to the east, north and west. These "green-field" areas, in accord with principles of the new General Plan, also "buffer" the community from adjacent communities. This is a classic "Smart Growth" plan, it concentrates intense development in the Village area which has evolved over the last 150 years as the business "crossroads" of Valley Center, as has been the formal intention since the first community plan of the 1960s, and it retains existing larger parcels for agriculture, horticulture and animal husbandry that have historically characterized Valley Center.

This faux Village both undermines the plan to attract new businesses and residential vibrancy to existing genuine Village areas AND destroys greenfields, as well.

The following comments refer directly to particular VC Design Guidelines. We have not re-typed the Guidelines here. Please refer to the pages that are cited below.

4. P 3. The Purpose of Design Review

Comment: The proposed project fails to consider the community context in which it takes place, and fails to make an effort to develop a compatible relationship to the natural setting, neighboring properties and community design goals.

5. P4/10 Community Design Objectives

Comment: The proposal ignores the most fundamental of Valley Center's Design Objectives, which is to PRESERVE NATURAL FEATURES and OPEN SPACES. For starters, the project will move 4.4 MILLION cubic yards of dirt on 608 acres. Do the math. There are 3,291,200 square yards in 608 acres. This means *the project will move more 1 ¼ cubic yard of dirt for every square yard of the property.* Natural land forms, vegetation and wildlife will all be obliterated.

This development plan completely disregards Valley Center's "strong requirements for the protection of existing natural features (that are) provided in the Design Guidelines for new development" (among them) "special measures to preserve oaks and sycamore trees, significant resources that contribute to the character of the valley and the community." The applicant should address how grading, scraping and denuding what looks to be at least 80% of the site reconciles with being sensitive to the natural environment?

6. P16. Site Analysis

Comment: No site analysis has been submitted. The site design process should begin with a thorough analysis of the site.

7. P17. Site Design Concept

Comment: General Criteria 1 and 2: There is no evident effort for the project design to comply at all with these criteria. The project ignores the rural residential character of the area, and destroys all of its natural features. As for General Criteria 3 and 4, the application does not include enough detail to determine anything about the internal integrity of the project. We will say, however, the pre-requisite site location issues make internal design details quite irrelevant. All of its failures to comply with the community's design objectives are rooted in this basic incompatibility of locating urban development in a rural area.

8. P18-22. Protection of Natural Features (to include Oaks and Sycamores)

The Guidelines state, "All development proposals shall demonstrate a diligent effort to retain existing natural features characteristic of the community's landscape. Existing topography and land forms, drainage courses, rock outcroppings, vegetation and views shall be recorded in the Site Analysis and incorporate, to the maximum extent feasible, into the future development of the land." See pp. 18-19 items A-H, all numbers under each item, noting the general rule, the "hand of man" is to be felt lightly", And pp. 20-22 about mature tree preservation and handling.

Comment: No effort evident. How much of the natural environment will be left... out of how much destroyed? How many trees? Rock outcroppings? Natural canyons? Hilltops? And so forth.

9. P26-35. Architectural Character and Compact Building Groups

Comment. Chapters 5 and 6 in Part III of VC's Design Guidelines address the array of requisite site planning and architectural approaches, and the ways these elements of design must be combined in order to produce Village development that aligns with historic patterns. Based both on the Master and the Implementing Tentative Map and Grading Plans, the Accretive plan for Village housing shows hyper-conventional suburban sprawl, little rectangular lots lined up cheek-to-jowl like rows of teeth on both sides of every road, obscuring from view the very countryside the plan claims to celebrate.

The Specific Plan Text for this project waxes rhapsodically about "Italian Hill Villages" that bear no resemblance to Accretive's development plan for this property. Italian hill villages are characterized, first and foremost, by their location at authentic "crossroads" and their gradual development to meet the authentic needs of the surrounding authentic community; and are further characterized by their irregularity and by the charm of a built environment arranged around the natural environment. The Accretive project is a rote suburban tract overbuilt to urban densities, sprawled across remote, roadless greenfields.

Nothing but a complete revision of this plan would hope to achieve what the Guidelines or the Specific Plan Text for this project describes.

Italian hill villages are characterized by their locations at authentic well-travelled "cross-roads", by the charms of irregularity and diversity, and by the arrangement of the built environment around the beauty of the natural landscape.



The Accretive plan imposes a monotonous sprawling geometric sameness on a contrived cut and filled landscape in a remote location. Below is a photograph of this developer's San Elijo project that shows cuts in landscape similar to their plan for West Lilac.



10. P67. Hillside Development

Comment: The applicant's development plan will destroy the natural topography in this area and "re-grade" the land. The applicant's consultant asserts that that "contour grading" of home sites -- so that each little

geometric rectangle is a few feet higher or lower than its immediate neighbor -- is the same as retaining the natural organic land forms. This is a ludicrous assertion that demonstrates the extreme extent to which this proposal contradicts the most basic concepts of rural design.

11. Landscape Concept

Susan Moore's Comments: The master TM lacks sufficient detail for a thorough review. However, from the documents that have been submitted, I can make the following comments. In my opinion, following the lot design as it does, the landscape plan is also an urban concept that needs to be completely re-done to be compatible with the property's rural surrounds. To create the "natural" character of Valley Center requires an organic, asymmetrical landscape design.

As for plant material, there are too few species; diversity (of trees, shrubs and ground covers) needs to be much greater. Several specified trees will not grow well in our zone generally and will definitely not succeed in Valley Center's colder micro-climates. Another is an allelopathic variety (suppresses growth of different plants other than itself due to release of toxic substances) tree listed for medians/entries where other plants are listed. Trees listed for the medians will not grow due to conditions that characterize road medians. "Grove" trees will not thrive in road median conditions and will be messy for automobiles and pedestrians. Fruit-producers are typically specified AWAY from streets and sidewalks where human activity is present.

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LETTER

RESPONSE

EXHIBIT 3

DEIR Public Comment Letter dated August 13, 2013 from Kevin K. Johnson APLC re:
Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan
PDS2012-3800-12-001(GPA),PDS2012-3810-12-001 (SP)-**General Plan and
Community Plan Inconsistencies**

LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT

For Public Use and Display
LEED 2009 for Neighborhood Development Rating System
Created by the Congress for the New Urbanism, Natural Resources
Defense Council, and the U.S. Green Building Council
(Updated October 2012)



LETTER

RESPONSE

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PREFACE FROM USGBC

The built environment has a profound impact on our natural environment, economy, health, and productivity. Through its Leadership in Environmental and Energy Design (LEED®) certification programs, the U.S. Green Building Council (USGBC) is transforming the built environment. The green building movement offers an unprecedented opportunity to respond to the most important challenges of our time, including global climate change, dependence on nonsustainable and expensive sources of energy, and threats to human health. The work of innovative building planning professionals is a fundamental driving force in the green development movement. Such leadership is a critical component to achieving USGBC's mission of a sustainable built environment for all within a generation.

USGBC MEMBERSHIP

USGBC's greatest strength is the diversity of our membership. USGBC is a balanced, consensus-based nonprofit with more than 20,000 member companies and organizations representing the entire building industry. Since its inception in 1993, USGBC has played a vital role in providing a leadership forum and a unique, integrating force for the building industry. USGBC's programs have three distinguishing characteristics:

Committee-based

The heart of this effective coalition is our committee structure, in which volunteer members design strategies that are implemented by staff and expert consultants. Our committees provide a forum for members to resolve differences, build alliances, and forge cooperative solutions for influencing change in all sectors of the building industry.

Member-driven

Membership is open and balanced and provides a comprehensive platform for carrying out important programs and activities. We target the issues identified by our members as the highest priority. We conduct an annual review of achievements that allows us to set policy, revise strategies, and devise work plans based on members' needs.

Consensus-focused

We work together to promote green buildings and neighborhoods, and in doing so, we help foster greater economic vitality and environmental health at lower costs. We work to bridge ideological gaps between industry segments and develop balanced policies that benefit the entire industry.

Contact the U.S. Green Building Council:

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www.usgbc.org

PARTNERSHIP

The Congress for the New Urbanism and the Natural Resources Defense Council collaborated with the U.S. Green Building Council in creating the LEED for Neighborhood Development Rating System. USGBC's consensus-focused approach to rating system development was furthered by these organizations' expertise in New Urbanism and smart growth strategies.

LEED FOR NEIGHBORHOOD DEVELOPMENT