

July 30, 2015

San Diego County Planning Commission
Attention: Lisa Fitzpatrick, Secretary
Attention: Mark Slovick,
Department of Planning and Development Services
5520 Overland Ave Suite 310
San Diego, CA 92123

**RE: Accretive Investments/Lilac Hills Ranch Master Planned Community
Lilac Hills Ranch: PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP),
PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM),
PDS2012-3300-12-005 (MUP), PDS2012-3500-12-018 (STP)**

Dear Commissioners:

On behalf of the Environmental Center of San Diego, thank you for the opportunity to comment on the above referenced Project. The Environmental Center of San Diego is dedicated to the protection and enhancement of the natural environment throughout the San Diego area.

Let me begin by expressing our grave concern over a project of this size in an area untouched by development, an area that has been slated for a much smaller footprint for development.

The proposed project impacts on the environment and the County's General Plan are unacceptable.

We support comments and concerns expressed by the Center for Biological Diversity, Endangered Habitat League, Cleveland National Forest Foundation and the League of Women Voters. The collective of concerns raised by these groups are of equal concern to the Environmental Center of San Diego.

We also agree with the Natural Resources Defense Council comments especially the following: "Because the Project cannot be found to be LEED-ND equivalent, the proposed Lilac Hills Ranch Specific Plan fails to meet mandatory General Plan standards governing new villages. As a result, the County is precluded by law from approving the Project." (See Endangered Habitats League v. County of Orange (2005) 131 Cal.App.4th 777 [specific plan approval set aside because "project is inconsistent with the general plan's traffic service level policy"].)

By way of a reminder, in updating the people's General Plan your own guiding principles charge you to;

- Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development
- Guide community development -how communities will accommodate growth while preserving character and protecting what the communities' value

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- To improve the existing County general plan by balancing growth the need to limit traffic congestion, preserve the environment and reduce the need to expand infrastructure and essential services
- Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
- Provide and support multimodal transportation
- Recognize community and stakeholder interests while striving for consensus

These guiding principles are supported by the County's **Land Use Element** which "provides a framework to accommodate future development in an efficient and sustainable manner that is compatible with the character of unincorporated communities and the protection of valuable and sensitive natural resources."

It is also stated: This General Plan recognizes and encourages these unique identities by providing sufficient flexibility within a countywide framework to respect the character of individual communities, neighborhoods, and landscapes.

Given the above, it is perplexing how this project can be considered as viable. It is as if the Planning Department did an about face from the hard work that went into the General Plan update. In addition it is also exposing the County to the threat of litigation.

The cumulative impacts of a project of this size are enormous. Current zoning for this area is a two acre minimum which fits the character of the surrounding communities. Why would you want to change this especially when the community groups and many, many people in the surrounding areas, oppose this type of leapfrog development. It was not what they were promised.

While some in San Diego may want to be known as "developer friendly" at what cost? We should view development as a gentle presence on the land. Not one of slash and burn development like the proposed Lilac Hills Ranch. Development must accommodate the environment not the other way around.

We urge you to make the politically difficult decision and deny the project and adhere to the principles and guidelines of the General Plan.

Thank you for your attention to our concerns.

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