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**San Diego County Planning Commissioners**

County of San Diego Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123

**RE: Recommend Denial of the Lilac Hills Ranch GPA**

Dear Chairman Woods and Commissioners,  
Soon you will be making a recommendation to the Board of Supervisors on Accretive Investment's proposal to amend the County General Plan. I hope you will uphold our General Plan.

More than a thousand comments about the deficits of Accretive's GPA proposal have been submitted by environmental and "good government" organizations, elected Community Planning Groups, citizen planners, individual citizens, and by land use attorneys. The final EIR is the THIRD go-round. Few comments have ever been addressed. The project remains unchanged. Rather than disclosing the impacts of this project on the County General Plan or on the ground, the EIR avoids, minimizes, or ignores them.

The County invested 13 years, \$18.6 Million and the blood, sweat, and tears of hundreds of citizens so that we would **quit chewing up farmland** to build NEW freeway-dependent commuter neighborhoods. The whole point of the highly touted County General Plan, the "Plan for Growth, Conservation and Sustainability" is to direct growth to existing Villages, job centers, transit and existing infrastructure, and to conserve functioning rural lands.

This project is **INCONSISTENT** with the concept of Smart Growth, and regardless of what the EIR asserts, **INCONSISTENT** with the GP Principles, Goals and Policies that were recommended by the Planning Commission and adopted by the Board of Supervisors to **produce** a "smart" result. **Obviously it is INCONSISTENT with the Plan** to urbanize 608 acres in an area with 1746 homes when the Plan calls for 110 homes on 4-and 10-acre agricultural parcels with back-country roads, no jobs, no transit, no shopping, no civic uses. **And it is ludicrous to claim otherwise.**

This change is **significant** -- to the **ground**, to the **County Plan**, to the **Community Plans** of Valley Center and Bonsall, **and** to the future approvals of the rash of other GPAs that also plop urban islands in rural places. Everybody else has to follow the rules! Why not these developers?

A Village Regional Category is **not a puzzle piece** to plop anywhere a developer options farm land. To change this Regional Category from Semi-Rural to Village asks more than a tweak to the land use map. **A Regional Category change** has to be consistent with the GP Principles, Goals and Policies that were **applied to the ground** to determine that **physical characteristics** make this land **not suitable** for more intense development in the first place -- slopes, fire vulnerability, no infrastructure, large parcels in productive ag.

Even within its own boundaries, this project is **inconsistent** with the Community Development Model and the Village Regional Category. It's **not** compact. **Not** at the "center" of the planning area. **Not** within walking distance of employment centers, civic uses, transit or commercial services. Two barely-touching pieces zig-zag 2 miles N-S and 2 miles E-W across farmland, slopes and creeks. Instead of "feathered" lot sizes, severe cuts and looming mounds of dense Village housing will about 4-acre and 10-acre parcels and creates 8 miles of edge effects.

The point is ... **Why NOT SAY SO?** Why **NOT disclose the true impacts** of this **amendment** to San Diego County's Smart Growth Plan? Why **fake it**? Why produce 10,000 pages of tortured circular logic to assert otherwise?

**A truthful EIR would inspire a GP consistent project OR would expose the true impacts of this 1600% up-zone on the Smart Growth County General Plan.** To produce such a shabby substitute for the truthful disclosure that CEQA requires is a breach of the public trust. We are asking you, the Planning Commissioners, to restore it.

- It is **disappointing** that EIRS 1 & 2 & now EIR 3 pander to the developer's assertion that this GPA is **CONSISTENT** with the County General Plan.
- It is **disturbing** that rigorous LEED-ND **planning criteria** have been replaced by an on-line **checklist for "green home construction"** (a non-equivalent "equivalent" if ever there was one, no location requirement for starters).
- It is **disgraceful** that this precedent- setting switcheroo is buried in **responses to public comments** particularly after public outcry in February, and the assurance that no change to LEED-ND would be made without thorough public review.

Your decision and the Board's will either **affirm** the County's role in **strengthening** San Diego's existing cities and Rural Villages **and preserving** our functioning rural lands. Or your decision will destroy the dream we all shared by spurring developer ambitions for windfall upzones through inconsistent General Plan Amendments.

Most Sincerely,



Lael Montgomery

P.S. Decision makers should encourage developers to invest in the sustainable future that San Diego has planned. This project (and the flotilla of additional GPAs in pipeline behind it) are **superfluous to accommodating growth OR to providing middle-income housing! And YOU know this!**

The GP designates **72,000 units** for development, more than SANDAG's growth projections. (And, we've learned from Andrew Keatts' investigative reporting in the Voice of San Diego that SANDAG's growth projections since the 1990s have been excessive.) For housing at the \$300K-\$500K level, there are already **1400-plus Village units designated for Valley Center's central valley**; and another **10,000 units designated for urban development in the North Metro CPA next to Escondido proper** with existing transit, shopping, jobs, urban roads, and city services! **BUILD THESE UNITS!**