

# Valley Center Community Planning Group

## Minutes of the October 22, 2012 Meeting

**Chair: Oliver Smith; Vice Chair: Ann Quinley; Secretary: Steve Hutchison**

7:00 pm at the Valley Center Community Hall; 28246 Lilac Road, Valley Center CA 92082

A=Absent/Abstain A/I=Agenda Item BOS=Board of Supervisors DPLU=Department of Planning and Land Use IAW=In Accordance With N=Nay  
P=Present R=Recuse SC=Subcommittee TBD=To Be Determined VCCPG=Valley Center Community Planning Group Y=Yea

Forwarded to Members: 13 November 2012

Approved: 19 November 2012

1. Call to Order and Roll Call by Seat #:										7: 04 PM				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N
A	P	P	P	P	A	P	P	P	P	P	P	P	P	P

**Notes:**

**Quorum Established:** 13 present

**Pledge of Allegiance**

**2. Approval of Minutes:**

**Motion:** Motion to approve minutes of 10-15-2012 as last circulated and as corrected

**Maker/Second:** Vick/Quinley

**Carries/Fails (Y-N-A): 13-0-0**

**3. Open Forum:**

None

**4. Action Items:**

**4.a.**

Consideration and vote on the report from the Lilac Hills Ranch sub-committee concerning the Lilac Hills Ranch Specific Plan. The committee report will review the Specific Plan and point out strengths and weaknesses. Project name: Lilac Hills Ranch Master Planned Community; Case numbers 3800 12-001 (GPA), 3810 12-001 (SP) Project Address: 32444 Birdsong Drive, south of West Lilac Road. The project proposes the construction of 1,745 dwelling units including multi-family, commercial, parks, trails, a school, age restricted community, waste recycling and collection facility and other associated civic uses. The project consists of a General Plan Amendment, Specific Plan, Rezone, two tentative maps, a Major Use Permit and an Open Space vacation. The approximate 608-acre project site is located south and west of West Lilac Road, generally east of Old Highway 395 and north of Mountain Ridge Road. The site is subject to the General Plan Regional Category Semi-Rural, Land Use Designations Semi Rural 4 and 10. Zoning for the site is RR2, Rural Residential and Limited Agricultural (A70) with a 2-acre minimum lot size. (Hutchison)

**Discussion:** Hutchison presents the seven major points of concern in the report to the VCCPG [final amended report is attached at bottom of minutes]. Glavinic says he agrees with the tenor of the report, but he has a number of amendment suggestions. He comments on his connection with SANDAG and their lack of interest in rural areas of the county. He wants to delete mention of SANDAG in Appendix A and elsewhere in the report. Rudolf asks about the procedure for approval of the report in general in order to understand how suggested changes will be made and approved. Glavinic makes 12 suggested changes to the report.

**Motion:** Move to accept the report based on wording changes Glavinic suggested in the discussion.

**Maker/Second:** Glavinic

**Carries/Fails: [Y-N-A] no second**

**Notes:** Britsch: recuses because he will be monetarily affected by project; Jackson: recuses because his home is within 300 ft. of the project

**Discussion [cont'd]:** Hofler asks about the traffic statement in the report regarding schools and how students will be distributed between the two districts. Smith suggests identifying all schools on the map presented in the report. Patsy Fritz, audience, addresses LEED ND references and alternatives. She wants to clarify LEED ND as the dominant standard. She then cites the staffing costs associated with the addition of a new school. She says rising water costs pressure some farmers to migrate to new crops, but ground water is very available in the Lilac Triangle. She says attributions to SANDAG in the appendix are important and meaningful. She suggests asking DPW for the actual cost of Valley Center Road for reference on page 3. Ann Quinley

addresses the use of 'SANDAG' on page 4, and elsewhere, and makes a comment about the introduction on page one. Tom Bumgardner, audience [and member of VC Parks and Recreation District], makes a comment about the paucity of parks proposed for the project and the unavailability of some project parks to VC residents living outside the project. Florence Sanopali, affected resident, asks about inclusion of the missing schools [Valley Center Elementary and Primary Schools on Cole Grade Rd.] on the map and if they are necessary to add. Hofler suggests that the distribution of students [particularly homeschooled] makes it important to include all schools. Patsy Fritz asks about silica and silicosis in relation to the proposed extensive grading of granitic rock and soils within the project. Quinley says it's included. An unidentified member of the audience raises a question about including a discussion about watersheds. Quinley points out that the technical report is not presently available. Chris Brown, representing Accretive Investments, Inc., says not all the studies have been submitted to the County nor certified for release at this point. He expects those reports to be released by the County within the next several weeks. Paul Herigstad, member of the Lilac Hills Ranch SC, says the County is not providing preliminary studies, which slows the review process.

**Motion:** Move to accept the report with minor wording changes as discussed by Hofler.

**Maker/Second:** Hofler/Rudolf

**Carries/Fails:** [Y-N-A] 11-0-2

A N D E R S O N	H U T C H I S O N	H O F L E R	G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	L E W I S	N J O O R H W N O S O O D N	S M I T H	J A C K S O N	R U D O L F	D A V I S	B A C H M A N
	Y	Y	Y	R		Y	Y	Y	Y	Y	R	Y	Y	Y

**Notes:** Britsch: recuses because he will be monetarily affected by project; Jackson: recuses because his home is within 300 ft. of the project

<b>5.</b>	<b>Discussion Items</b>	
	None	
<b>6.</b>	<b>Subcommittee Reports &amp; Business:</b>	
a)	Mobility – Robert Davis, Chair.	
b)	GP Update – Richard Rudolf, Chair.	
c)	Nominations – Hans Britsch, Chair.	
d)	Northern Village – Ann Quinley, Chair.	
e)	Parks & Recreation – Brian Bachman, Chair.	
f)	Rancho Lilac – Ann Quinley, Chair. - inactive	
g)	Southern Village – Jon Vick, Chair. :	
h)	Spanish Trails/Segal Ranch – Mark Jackson, Chair. - inactive	
i)	Tribal Liaison – Larry Glavinic, Chair:	
j)	Website – Robert Davis, Chair:	
k)	Pauma Ranch – Christine Lewis, Co-Chair; LaVonne Norwood-Johnson, Co-Chair.	
l)	Lilac Hills Ranch [Accretive] – Steve Hutchison, Chair	
m)	Equine Ordinance - Oliver Smith, Chair	
<b>7.</b>	<b>Correspondence</b>	
	None	
<b>8.</b>	<b>Motion to Adjourn:</b>	<b>8.45 pm</b>
	<b>Maker/Second: Smith/Quinley</b>	<b>Carries/Fails: [Y-N-A] Voice 13-0-0</b>

**Note:** Next regular meeting scheduled for 19 November 2012

Appended materials: Report of the Lilac Hills Ranch Subcommittee [final version]:

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

## **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 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 those, 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 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 \$37,400,000 dollars.

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 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.*

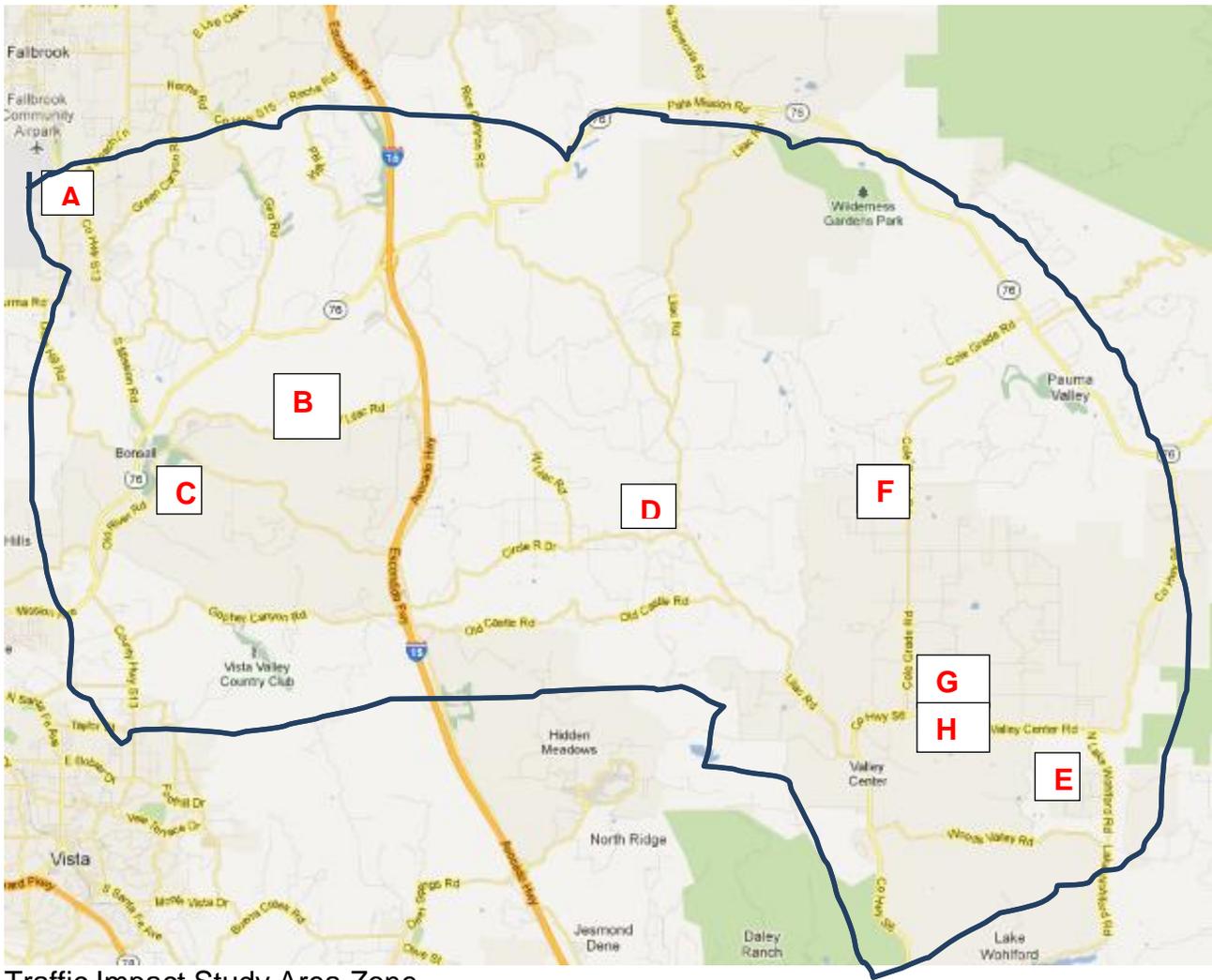
The private roads described in the Specific Plan and Master Tentative Map have several road intersection designs that pose safety concerns. Further, in the Specific Plan and Master Tentative Map the applicant is asserting legal rights to road easements on Private Roads for which the applicant likely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

#### *Traffic Impact and Traffic Impact Study*

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 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.
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.*<sup>1</sup> 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.

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

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<sup>1</sup> 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.

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, VCWMD 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 Plant 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 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.

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



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

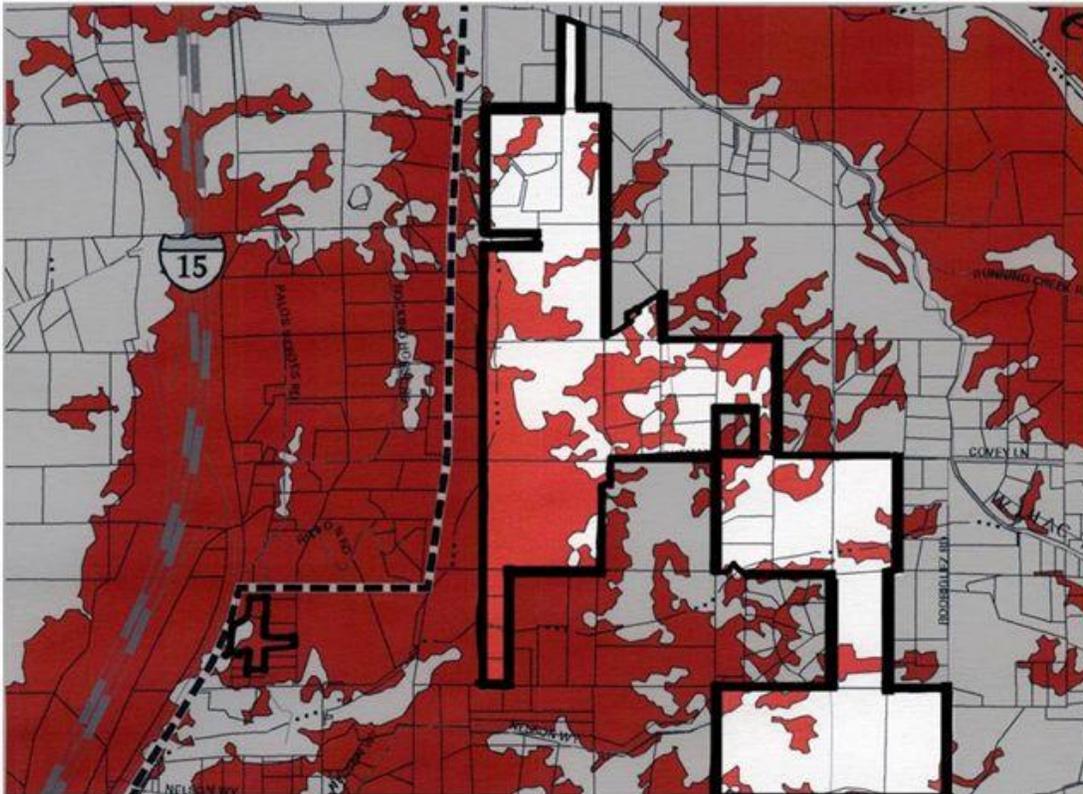
They talk about a “walkable village” when the site spreads over two square miles and requires three retail nodes in order to be even remotely walkable. The applicant has taken the position that such an oddly shaped and sized Project is “compact” and “efficient”. But this is merely the kind of false speak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

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)
<b>NOTE: Be sure to enter only occupied units / spaces</b>				
<b>Residential</b>				
	Estate, Urban or Rural Single Family Detached	1400	DU	
	Condominium	346	DU	
	Apartment		DU	
	Mobile Home (Family)		DU	
<b>Retail</b>				
	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	
<b>Restaurant</b>				
	Quality 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	
<b>Office</b>				
	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	
<b>Industrial</b>				
	Industrial / Business Park (with commercial)		ksf	
	Industrial / Business Park (no commercial)		ksf	
	Industrial Plant		ksf	
	Manufacturing		ksf	
	Warehousing		ksf	
	Storage		ksf	
	Science Research & Development		ksf	
<b>Lodging</b>				
	Hotel (w/convention facilities, restaurant)	20	Occ. Room	

	Motel		Occ. Room
	Resort Hotel		Occ. Room
<b>Misc. Uses</b>			
	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
<b>Education</b>			
	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
<b>Trips from Land uses not covered above ==&gt;</b>	2860		0
<b>Jobs in those Land Uses</b>	0		0

	Daily	AM Peak Hour	PM Peak Hour
<b>Total "Raw" SANDAG Trip Generation Trips</b>	<b>31,442</b>	<b>2,460</b>	<b>2,802</b>