

Attention Mark Slovick,

We are writing this letter in opposition to the purposed Lilac Hills Ranch master planned community project. We feel this development violates too many provisions set forth in the general plan. Infrastructure like roads, bridges, water, sewer and schools are totally inadequate to support this development. We urge the county to reject the Lilac Hills Ranch project.

Thank you,
Robert and Carla Alvarez

LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017
(STP), 3500 12-018 (STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT EIR PUBLIC REVIEW PERIOD
July 3, 2013 through August 19, 2013

DRAFT EIR COMMENT SHEET

Thursday, August 1, 2013
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

1. Four parcels with which Accretive is involved have appeared and then disappeared from the public lists of parcels for this project: 128-290-78-00, 128-290-53-00, 128-440-07-00, and 128-440-11-00. They are not included in the current list of parcels for this project's EIR. What is the effect on this EIR if any or all of those parcels are added to the project at a later date?
2. How does the incomplete road network presented for this project affect the EIR?
3. The recent General Plan Update was approved, the EIR certified, and green house emissions analyzed based it providing an adequate housing supply out to 2050. What is the effect on those three things by adding this project's additional 1746 dwelling units?
4. Does this project provide charging stations for electric vehicles?

(Attach additional pages as needed)

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

Charlene Ayers 8.14.13
Signature Date

CHARLENE AYERS
Print Name

10801 DEWITT CT
Address

EL CAJON CA 92020
City State Zip Code

619-442-8046
Phone Number

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 19, 2013

Slovick, Mark

From: Charlene Ayers <char.ayers@att.net>
Sent: Wednesday, August 14, 2013 10:32 AM
To: Slovic, Mark
Cc: Ranters Roost
Subject: Lilac Hills Ranch - DEIR Comments
Attachments: Accretive-LHR-DEIR Comments - Ayers.pdf

Mr. Slovic...

I am attaching my comments/questions regarding the Lilac Hills Ranch DEIR.

I am also informing you of my latest research at the Assessor Recorder County Clerk's office on the four parcels mentioned in my comments as well as one other parcel. The latter parcel was never mentioned in any public lists that I have seen.

All these parcels are or have been connected to Accretive Investments.

APN 128-290-53-00 Theodore Sumer. Purchase Option recorded.
APN 128-290-78-00 Alligator Pears LP. Accretive owned property.
APN 128-440-07-00 Francisco Mariscal Diaz. Purchase Option from "Steppes Ranch LP," an Accretive Investments corporation, recorded on 6-13-2013.
APN 128-440-11-00 Barry Sheffer. Court case involving Purchase Option "Dismissed without prejudice."

This APN turned up unexpectedly in my search: 128-290-62-00 Akira Muroya. Quit Claim to "Steppes Ranch, LP," an Accretive Investments' corporation, recorded 1-24-2013.

For your information.

Charlene Ayers

Lilac Hills Ranch Project is a prime example of a project benefiting special interests and is clearly not in the public interest. It would degrade the communities it would impact in many ways including significant negative impact on the environment, exposing its residents to significant danger of fire and significant traffic congestion on West Lilac Road and neighboring roads. It is opposed by the local planning commissions and majority of residents. Many Valley Center residents have said they do not want Valley Center to become "Valley City"

For the aforementioned reasons any permits sought to build Lilac Hills Ranch should be denied by the San Diego County Board of Supervisors as it would significantly degrade the area its advocates seek to develop.

-Elliot Becker
Escondido, CA

August 16, 2013

Allen F. & Karen Binns
2637 Deer Springs Place
San Marcos, CA 92069-9761
760-744-5916
royalviewranch@aol.com

Mark Slovick
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Lilac Hills Ranch Draft DEIR Comments

Dear Planning Department:

General Plan. General Plan. General Plan. What has happened to the newly written General Plan? Surely it cannot be already outdated! It was just approved in August 2011. I realize that it took 12 years and in excess of \$16 million dollars but after all the time spent by the Public and money spent by the County, staff must have known what was best for that land.

It is now zoned Semi Rural SR-10, SR-4. It is zoned for about 110 homes. They are asking for 1746 units on 608 acres. That is a **1700% increase** over the General Plan!

This will be the “test case” for the newly released General Plan. Is the County going to demolish that General Plan or will they uphold it?

Another comment I would like to make is regarding the Developer not wanting to do a list of road improvements. If he wants to do his project then he needs to do the road improvements needed for the increase in traffic caused by his project. This is a Health and Safety concern, especially in the case of a wildfire.

Sincerely,

Allen F. Binns
Karen Binns

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Objections:

- 1) Economic Viability: nearby Pansky development (Hwy 15 + 79) still not sold out or built out over a decade old to Bonvall River view Shopping Center still struggling despite much traffic on 79 few find reasons to stop development located in Emerald Valley with limited views (like Pansky) and poor air circulation.
- 2) No local necessities: children would be crossing winding roads to either Valley Center or Bonvall

(attach additional pages as needed)

 8/19/2013
 Signature Date

Andrea Bower
 Print Name

31724 ROCKSING HOME RD
 Address

ESCONDIDO CA 92026
 City State Zip Code

760-728-1485
 Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
 County of San Diego
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 5510 Overland Avenue, Suite 310
 San Diego, CA 92123
 FAX # (619) 694-3373
 Email: Mark.Slovick@sdcounty.ca.gov

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Life: Mike Busch EIR continued:

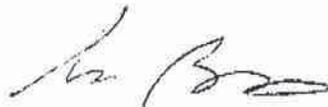
Andrea Bower MD

b. The economic shopping (not stop and go) over eight miles away in Escondido or Temecula (Boswell's Riverview is expensive for seniors and families on regular basis 6 miles away) c. The hospitals and clinics are in Fallbrook (12 miles) Escondido (11 miles) and Temecula (8 miles) d. There are no adequate roads, no sewers, no cable, phone, internet, no power and no water. The individual car is presently the only form of transportation. Sheriff response time can be 15 - 30 minutes.

J. This area has a lot of brush valleys and hills and is the habitat for coyote packs, bobcats, scorpions (small) and many rattlesnakes.

4. Certain people like to live in isolated country with room and views and they put up with the wildlife, the noise, the lack of conveniences and wildfire risk many others like seniors who fearing debility will find the necessities too far (must drive to those places) and families with young children may find too little nearby for them to do. My neighbor moved out for that reason.

Dr. Andrea Bower



31724 Rocking Horse Rd.

Escondido, CA 92026

Dear Mr. Slovick,

We live at 9040 w. Lilac rd., which is located just north of the proposed project area. My wife and I fully agree with the significant/unavoidable impacts noted in the draft EIR and appreciate the department's hard work in putting the report together. After reading the report, I noticed the biological portion of the report failed to address the kangaroo rat which inhabits the proposed project area and that I have personally observed on several occasions. We would like to request a revision to the report to acknowledge the species inhabitants of the proposed project area and the impact the project would have on the subject species. If you require additional information regarding this request, please reply via this email or at address listed below.

Sincerely,

Greg and Christine Brady
9040 w. Lilac rd
Escondido, Ca 92026

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(Attach additional pages as needed)

Christine Brady 8/14/13

Greg Brady 8/14/13

Signature Date
Christine Brady
Greg Brady
Print Name

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

9040 w. Lilac Rd.
Address

Escondido, CA 92026
City State Zip Code

(760) 723-3539
Phone Number

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1. PLEASE ANSWER WHY THE FOLLOWING PARCELS ARE NOT IN THE LISTS FOR ACQUISITION: APN 128-290-5300; 128-290-7800; 128-440-0700; 128-440-1100.
2. PLEASE SHOW HOW THE TRAFFIC WILL PROCEED UP RODRIGUEZ RD AND THROUGH THE "COVEY LANE-WEST LILAC RD" INTERSECTION.
3. AGRICULTURE BRINGS HUGE LOCAL AND TOURISM DOLLARS TO SAN DIEGO COUNTY. PLEASE PRESERVE THE GROWING GROUNDS IN THIS AREA.
4. WHAT IS THE AIR POLLUTION CAUSED BY THE NECESSARY GRADING AND FUTURE TRAFFIC. I-15 IS ALREADY AT A STOP GOING TO TEMPERA DURING RUSH HOUR.

Elizabeth A. Bulkeley 8/19/2013
 Signature Date

ELIZABETH A. BULKELEY
 Print Name

9885 W. LILAC RD.
 Address

ESCONDIDO CA 92026
 City State Zip Code

760-749-7446
 Phone Number

MAIL, FAX or E-MAIL FORMS TO:

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 San Diego, CA 92123
 Phone: (619) 694-3373
 * email: Mark.Slavick@sdcounty.ca.gov

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WERE are the community parks with ball fields etc ???????????/

On Wed, Jul 3, 2013 at 7:18 AM, Slovick, Mark <Mark.Slovick@sdcounty.ca.gov> wrote:

All,

The Draft Environmental Impact Report for the Lilac Hills Ranch project is available for public review online at: http://www.sdcounty.ca.gov/pds/ceqa_public_review.html.

Comments on the proposed Draft Environmental Impact Report, General Plan Amendment and Specific Plan must be received no later than August 19, 2013 at 4:00 p.m.

Please let me know if you have any questions.

Thanks,

Mark Slovick

Land Use Environmental Planner

Planning and Development Services

County of San Diego

[\(858\) 495-5172](tel:(858)495-5172)

Subject: Lilac Hills Ranch project

Mr. Slovic...

I am writing you regarding the Lilac Hills Ranch project. I have many concerns regarding this project, but will keep my comments brief.

This project is contrary to the good planning principles upon which the General Plan Update was based. It spatters urban building densities into a rural agricultural area without appropriate existing infrastructure. This plan goes against the county General Plan Updated project that was approved by the Board of Supervisors two years ago.

Phase 4 - a 300,000 sq. ft., three story assisted living residence building, along with other planned businesses, and the number of planned family dwellings - will destroy our community. This is agriculture land, not residential. How can West Lilac and Circle R handle this type of traffic? This is a serious traffic increase. The current roads cannot handle this project. This project should exit on Old Highway 395, not west Lilac. This is not a neighborhood development, it's an independent city. This project will destroy this rural agricultural area. Please stop this from happening and abide by the existing zoning.

Jeffrey Burdett
31418 Rodriguez Rd.
Escondido CA 92026

It is surprising that after spending tax payer time and energy on developing, reviewing and attending meetings on 20-20, the county would consider approving a major change to the plan namely Lilac Hills Ranch(LHR). I attended those meetings and was in agreement with your maps and findings. I object strongly to imposing a new housing project such as LHR on designated agricultural land. I also object to the traffic and difficult school situation it will cause. As a VCPUSD board member I am concerned with the busing of children to school and lack of clarity on who will pay for a school for a dense population. LHR developers assert they will "build" a school but fail to explain who will pay for the construction. The development falls in the jurisdiction of two districts.

Further, other developers have been working for several years with the community to meet the 20-20 plan and the community needs and the LHR has not. Why would you approve this project ahead of those already meeting the plan?

Finally, it is clear from the faulty DEIR the LHR group presented, they have not carefully done their homework. A clear majority of homeowners object to the plan and the Valley Center Planning Group voted 11-1 to forward criticism of the DEIR to the county.

Karen Burstein voter in SDCounty

1/4

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I've lived in San Diego County all my life (60 yrs)
 I moved to Valley Center 15 yrs ago to enjoy a rural
 quality of life in a unspoiled natural environment. Not
 to have this so called village directly across the street.
 West Lilac Road is not safe to have 11,000 vehicles a
 day on it, let alone the un-safe back ups were going
 to have on Interstate 15 North bound off ramps approx 1,000
 peak hour cars trying to exit the freeway. →

(Attach additional pages as needed)

Bruce W. Christensen 8/18/13
 Signature Date

Bruce W. Christensen
 Print Name

9168 W. Lilac Rd
 Address

Escondido CA 92026
 City State Zip Code

760-994-8338
 Phone Number

MAIL, FAX or E-MAIL FORMS TO:

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2/4

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How about 10-15,000 cars a day on a 2 lane Overpass
 (Bridge). How is this smart growth? The closest
 major Grocery Store is 13 miles away? How about
 The closest Jobs at least 15 miles or more away
 causing more greenhouse gas emissions, more miles
 driven to go to work! Closest High school 13 miles
 away, where is the closest nearby crime? This Village
 is not going to create employment! 61,500 s.f of command

(Attach additional pages as needed)

Bruce N Christensen 8/18/13
 Signature Date

Bruce N Christensen
 Print Name

9168 W Lilac rd
 Address

Escondido CA 92026
 City State Zip Code

760-994-8338
 Phone Number

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3/4

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uses is a joke!
 Where are the benefits to the community of Dorsal
 on Valley Center other than 15,000 vehicles a day and
 urban sprawl. This project is Leap Frogging contrary
 to the General plan. IN closing I'm send you a copy
 OF the second paragraph of the General Plan it says
 it all. The project violates your plan! Tell me how
it doesn't!

(Attach additional pages as needed)

Bruce N. Christensen 8/18/13
 Signature Date

Bruce N. Christensen
 Print Name

9168 W. Lilac rd
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Process

The General Plan directs future growth in the unincorporated areas of the County with a projected capacity that will accommodate more than 232,300 existing and future homes. This growth is targeted to occur primarily in the western portions of the unincorporated County where there is the opportunity for additional development. Compared to the previous General Plan, this update reduces housing capacity by 15 percent and shifts 20 percent of future growth from eastern backcountry areas to western communities. This change reflects the County's commitment to a sustainable growth model that facilitates efficient development near infrastructure and services, while respecting sensitive natural resources and protection of existing community character in its extensive rural and semi-rural communities. The General Plan provides a renewed basis for the County's diverse communities to develop Community Plans that are specific to and reflective of their unique character and environment consistent with the County's vision for its future.

9/4

↓
what services?

Policies

Information Program

Planning Information

Advisory Groups

From Valley Center general plan

Valley Center's rural character will be best maintained by focusing population growth in the community's north and south Village areas, and by limiting Village Residential densities to these areas (refer to Figure 3 on page 5). Residential densities decrease from the Villages outward to semi-rural and rural areas, which are located at the exterior limits of the CPA. The two Village areas contain industrial, commercial and residential land uses. It is the intent of the community to keep semi-rural and rural areas in low density residential and agricultural uses and free from industrial and commercial encroachments.

Enforcement of guidelines for site design, architecture and landscaping contained in the Valley Center Design Guidelines will ensure that development is consistent with the community's character.

The Village Boundaries for Valley Center are shown on Figure 3 below.

POLICIES AND RECOMMENDATIONS

1. Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan. [PP]
2. Maintain the existing rural character of Valley Center in future developments by prohibiting monotonous tract developments. Require site design that is consistent with the rural community character. [PP]

This project is not SMART Growth!
It's All About Greed!
Looking Forward : to your response!



Cosmos' Acres
Avocados & Fruit

Michael Karp
12115 Mesa Verde Drive
Valley Center, CA 92082

August 8, 2013

Mark Slovick
County of San Diego Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: DEIR Public Comments to the Proposed
Accretive General Plan Amendment and Specific Plan
PDS2012-3800-12-001(GPA), PDS2012-3810-12-001(SP)

Dear Mr. Slovic:

I appreciate the opportunity to comment upon the above proposed project. Since reading through the DEIR: Subchapter 2.4--Agricultural Resources, I have some strong concerns about the effects of this project upon farming in the region.

Where feasible, I cite the passage from the document that concerns me. My comments and requests for additional information and/or study follow (in italics).

2.4.1.1 Regulatory Framework

DEIR: Subchapter 2.4 Agricultural Resources

- Prime Farmland has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to Natural Resources Conservation Service (NRCS) mapping. **The project**

12115 Mesa Verde Drive, Valley Center, CA 92082
760-913-9003 * michael@cosmosacres.com

site does not contain any land designated as prime farmland.

- Farmland of Statewide Importance possesses minor shortcomings when compared to Prime Farmland, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping.

Comment: *It would be wise to update the definition of "prime farmland" in this area of San Diego County. It is clear that many farm operations are now employing greenhouse and nursery operations which require a much lower amount of irrigation as well as existing on-property soil quality. Imported soil amendments and tents are frequently used. A year-round growing season, characteristic of San Diego County, brings this land much closer to "prime farmland" as compared to farmlands in more inhospitable climates.*

Comment: *In addition, this project will not be build for several-to-many years, particularly in its later phases. The nature of agriculture in America in general and San Diego County in particular will have changed and evolved by that time and so will the classification of the land. The usefulness of all lands in and near the LHR project will have "improved." It would be wise for the developer and those involved in this project to provide a wide-reaching study—regional, State, National & International—to demonstrate how others rate and use their farmlands.*

Comment: *Does "prime farmland" have a relative definition? The flatness of the mid-west and San Juaquin Valley obviously adds to the number of acres of "prime." So does the drainage aspect of the San Juaquin. However, San Diego county is rolling and hilly, leaving it a poor comparison to US "breadbasket" areas. I would like to see a more detailed report that would redefine "prime farmland" relative to San Diego County. Please include how other entities--regional, State, National & International—view and define their "prime" farmland.*

DEIR: Subchapter 2.4 Agricultural Resources

- Unique Farmland is of lesser quality soils used for the production of the state's leading agricultural crops. Unique Farmland includes areas that do not meet the above stated criteria for Prime Farmland or Farmland of Statewide Importance, but that have been used for the production of specific high economic value crops during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods.

Comments: *Under the current trends towards nursery and greenhouse crops, all of the lands in this area would likely qualify as "Unique Farmland." The LHR project could dilute the effect and hamper the production of neighboring farmlands. In addition, since these types of productions are fairly new, it would be unwise and unproductive to consider past use alone, if at all. This area has the potential to continue to grow into a large and thriving industry of locally grown products. Please provide modern and wide-reaching studies—regional, State, National & International--of the characteristics of such operations nationally and internationally as well as the effect of dilution/disruption in urban and suburban proximate areas.*

Comment: *Rather than rating along the lines of history of having irrigated crops, would not it be more relevant to rate these lands in terms of proximity to other farmlands? Please expand your study to include other agricultural areas, nationally and internationally, and how they rate their multi-use farmlands, particularly in proximity to urban and suburban areas as well as the effect of having farmland uses grouped together vs. atomized.*

Comment: *Various reports and documents rate Valley Center's agricultural resources as important to the local economy. Please provide a further broad-reaching study depicting the potential disruptive and*

dampening effect this project will have economically on the VC area and SD County. Please give detailed justification for the likelihood that support of the LHR project contradicts the SD County Board of Supervisor's assertion that VC agriculture is important for the County economy.

Comment: *It is difficult to know what future ag operations could begin in areas that surround this project. Limitations and restrictions of pesticide use could make many agricultural operations more costly or impossible. Considering current and future uphill ag battles such as the importation of overseas infestations and foreign competition, the existence of LHR in this area could severely inhibit this area economically. A much more detailed study must be done that encompasses any reasonable restrictive scenario, its instrumental and economic impact upon all potential ag operations and, in turn, its impact upon the broader area. Please include regional, national and international scenarios.*

Comment: *Are effects of the project considered generally for surrounding areas: immediately, community & regionally? Please provide a study regarding this topic.*

DEIR: Subchapter 2.4 Agricultural Resources

The County has completed a contract with American Farmland Trust to help develop the Farming Program. The Farming Program is intended to create the framework for an economically and environmentally sustainable farming industry for San Diego County. The program, when adopted, **will include land use policies and programs to keep land available and affordable for farming** on a voluntary basis. It will also include economic development tools to help improve farm profitability.

Comment: *What is the AFT's evaluation of this project and its effects upon the viability and continuance of this area for profitable farming into the future? Are there implications in this document of the potential effects of the LHR project?*

Comment: *With a dense residential and multi-use project, restrictions on pesticide use will undoubtedly become more stringent, possibly crippling agriculture in the surrounding area. A detailed study documenting the likely restrictions on pesticide use for surrounding agricultural operations would be wise.*

2.4.2.2 Issue 2: Land Use Conflicts

Guidelines for the Determination of Significance

Based on the County of San Diego Guidelines for Determining Significance – Agricultural Resources (County of San Diego 2007c), the project would have a significant impact if it:

- Proposes a school, church, day care, or other use that involves a concentration of people at certain times within **one mile of an agricultural operation** or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the project would likely occur and could result in conversion of agricultural resources to a non-agricultural use;

*The report later goes on to deem the impact of the proposed LHR school as insignificant: "Because the project design locates the school site away from the project boundary (325 feet), and state regulations prevent aerial pesticide "drift" onto neighboring properties; indirect impacts associated with the proposed school would be **less than significant**. In addition, the future school site would include fencing and security gates to prevent unauthorized ingress or egress and eliminating associated trespass/vandalism conflicts."*

Comment: *Regulations require schools to be further than 1 mile from ag operations. This school site is 325 feet from an existing operation. Avocado & Citrus are vulnerable to known and unknown (future) infestations. Inhibiting the freedom to spray pesticides, herbicides and fungicides could doom their operation or endanger the vulnerable population using the school site. Please provide more detailed*

studies concerning the proximity of "vulnerable" sites such as schools and ag operations from regional to international examples and the effects upon the surrounding ag operations and vice versa.

Group residential or (GR) would include "Group Care" land uses with units for independent living, assisted living, and dementia care. With approximately 200 units within a 6.5-acre site, this land use type would be considered a sensitive receptor. The GR area borders off-site estate residential land uses to the east. The remaining three sides are internal to the project site: biological open space lies to the south; and SFS (age restricted single-family detached) is to the north and west. The nearest active agricultural operation to the GR would be approximately 2,400 feet to the southeast or 2,900 feet to the east. As shown on Figure 2.4-4, neither of these agricultural operations is subject to aerial spraying. Because of the distance between these land uses and the fact that no aerial spraying has historically occurred; **no significant impacts** are anticipated.

Comment: Still, within 1 mile. This would inhibit aerial spraying if a future such ag op were proposed for this area. As requested above, please justify why the County is not requiring LHR to consider possible future uses as well as past.

Hazardous Materials Storage, p. 2.4-20 Such regulations would include an on-site ban on aerial pesticide spraying, restrictions on the types of fertilizers that could be used, and limitations on the types of equipment and hours of operation of maintenance activities. All pesticide and hazardous materials storage, on- or off-site would be required to comply with the state requirements and the applicable regulations enforced by the County Agriculture Weights and Measures. Notwithstanding storage protection measures and regulatory compliance, **significant impacts** could occur along the AAs identified above (**Impact AG-12**).

Comment: The restrictions upon proper cultural practices for grove management would endanger the viability of these LHR on-site ag operations. If these operations would cease (i.e. kill or damage the trees) because of these onerous restrictions, wouldn't the usefulness of these zones as barriers for this and other use conflicts be removed? Please study this possibility carefully.

Pathogens/Diseases, p. 2.4-20

Comment: The shot-hole borer is currently moving towards San Diego County from the north. It is lethal to citrus trees and has no cure, only careful ag cultural practices to prevent and manage its spread. The general public knows little about its spread or prevention. This makes management of these and any potential future pests nearly impossible. Please provide a study which compares its spread to ag operations from adjacent urban vs. rural and ag areas.

Nighttime Lighting p. 2.4-20

Comment: How could future possible ag lighting practices be affected by LHR? Please provide studies demonstrating various scenarios: effects of lighting incompatibilities from both directions.

2.4.2.3 Issue 3: Indirect Conversion of Agricultural Resources p. 2.4-23 Cumulative impacts related to farmland conversion could also result from edge effects, including trespassing, pilfering of crops, and damaged farm equipment. The pressure, inconvenience, and increased costs of operating remaining farms in areas converting to other uses may render continued farming infeasible or, at least, heighten the attractiveness of selling other farms for development.

Comment: *The economic engine for this region has great potential, but is fragile. Dilution of actual land uses could further endanger the feasibility of the potency of this engine. Wouldn't it be wiser to encourage other uses that are compatible with agriculture instead of inhibitory ones such as the LHR project? Compatible uses could be: ag, solar wind generation, breweries and wineries, and other food-processing and production operations.*

Comment: *Considering the importance of agriculture to the entire region, could a study of ag vitality comparing the saturation of ag-compatible vs. ag-conflicting actual and potential land uses be undertaken?*

Thank you, once again, for considering my concerns regarding this project. Feel free to contact me if you would like additional information about what I said. I look forward to your reply and any actions taken.

Sincerely,

Michael Karp
Owner of Cosmos' Acres Farm

Darnell & Associates, Inc.

TRANSPORTATION PLANNING & TRAFFIC ENGINEERING

August 16, 2013

Mr. Mark Jackson
9550 Covey Lane
Escondido, CA 92026

D&A Ref. No: 130703

RE: Review of the Lilac Hills Ranch Development (LHR) in the unincorporated Valley Center area Traffic Impact Study (TIS) and Traffic/Transportation Sections of the DEIR for the project.

Dear Mr. Jackson:

In accordance with your authorization, I have reviewed the Traffic Impact Study prepared by Chen Ryan & Associates dated June 28, 2013 and subchapter 2.3 Transportation Traffic of the DRAFT Environmental Impact Report prepared by Recon Environmental, Inc. dated July 3, 2013.

OVERVIEW

The Accretive Group, the project proponent proposes an amendment to the County of San Diego General Plan to develop Lilac Hills Ranch, which encompasses 608 acres in the westernmost portion of the Valley Center Community Plan (VCCP) and the Bonsall Community Plan (BCP). The project proposes to amend the County's General Plan to permit the development of 90,000 square feet of Commercial, Office and Retail space, 50 Room Country Inn, 903 Single Family Detached Homes, 164 Single Family Attached Homes, 211 Residential Units within the mixed use areas, 468 Single Family Detached Age-Restricted Residential Units within a Senior Citizens neighborhood including a Senior Community Center, Group Residential and Group Care Facility, a Dementia Care Facility, Civic Facilities and Public and Private Parks.

Development of the proposed project will reportedly result in the trip generation of 19,428 Daily trips, 1,663 AM peak hour trips and 1,829 PM peak hour trips to be added to the surrounding roadways and intersections.

Chapter 4.4 of the Draft EIR for the project identifies that development consistent with the County's General Plan would allow 110 Single Family Dwelling Units and would preserve 257 acres of open space. Development in accordance with the existing General Plan would result in 1,320 ADT's to be added to the surrounding street system (See Section 4.4.2.3 Transportation Traffic of the DEIR).

Comparison of the existing General Plan development of 1,320 ADT's to the proposed 19,428 ADT's shows that the proposed project would generate 14.7 times more traffic than the approved General Plan.

The recently adopted Mobility Element of the County's General Plan does not include the section of New Road 3 from Highway 395 to West Lilac Road. The deletion of the section of New Road 3 changed the classification of Highway 395 to a four-lane Boulevard with a LOS "D" Capacity = 25,000 ADT and West Lilac Road from Highway 395 to New Road 3 to a Light Collector 2.2C, with intermittent turn-lanes with a LOS "D" Capacity of 13,500 ADT.

West Lilac Road is the primary access road serving the project. Secondary access to/from the project site is proposed to be provided by Covey Lane between West Lilac Ranch Road and Mountain Ridge Road extending north from Circle R. Drive to connect to West Lilac Ranch Road. Both Covey Lane and Mountain Ridge Road are private roads and do comply with the County Design Standards.

The following are my comments on the Traffic Study, General Plan consistency and applicant's requested Design Exceptions to the County's Road Standards.

LILAC HILLS RANCH (LHR)

Comments on the Chen Ryan & Associates Traffic Study dated June 28 2013.

1. Trip Generation:

:

In reference to Table 4.8 on Page 52 of the Traffic Impact Study (TIS):

In Summary, the LHR TIS calculates 19,428 Average Daily Trips using inappropriate trip generation rates as listed below. A fair and reasonable estimate of traffic volume using SANDAG's Guide for Vehicular Traffic Generation Rates is 21,744 ADT, an 11.9 % increase in ADT volume.

- As suggested in SANDAG's Guide for Vehicular Traffic Generation Rates, a daily rate of 40 vehicular trip ends per 1,000 sq. ft. is used for the "Specialty/Strip Commercial" category. There would be 61,500 sq. ft. of space devoted to this category, resulting in a total of 2,460 daily vehicular trip ends. The term "Specialty/Strip Commercial" is not used, however, on Page 40 of the TIS. Rather, the description given is "local serving, small scale, and boutique style specialty retail." Based on the amount of proposed space and the inclusion of "local serving" in the description, a trip generation rate of 120 daily vehicular trips per 1,000 sq. ft. should have been used in the TIS. The rate of 120 daily vehicular trips per 1,000 sq. ft., per SANDAG, would be applicable to "Neighborhood Shopping Center" and would include "usually, grocery & drugstore, cleaners, beauty and barber shop, & fast food services." This type of businesses would appear to be well-suited for a community at a location such as Lilac Hills Ranch. The lack of such essential services would necessitate travel of five or more miles to a grocery store.

If the more relevant rate of 120 per 1,000 sq. ft. had been used, the result would have been 7,380 daily vehicular trip ends, instead of 2,460 resulting in 21,704 daily trips, likely resulting in significant impacts beyond those identified in the TIS.

The attached Table A (see pg. 4) presents the increase in project traffic.

- A rate of 14 daily vehicular trip ends per 1,000 sq. ft. is used for the office category. Per SANDAG, this rate applies to "Single Tenant Office." The rate for "Standard Commercial Office, less than 100,000 sq. ft.," is 20 per 1,000 sq. ft. In a setting such as Lilac Hills Ranch, office space would likely be needed for such businesses as insurance agencies, real estate agents, financial brokerages, and similar tenants that would individually require much less space than the 28,500 sq. ft. that is proposed. Another possible use would be for doctors' or dentists' offices, with a SANDAG rate of 50 per 1,000 sq. ft. In view of these considerations, the use of 14 daily vehicular trip ends per 1,000 sq. ft. in the TIS is not appropriate. A rate of 20 per 1,000 sq. ft. should have been used in the TIS because it would have been more representative of the likely mix of office uses in Lilac Hills Ranch.

The more relevant rate of 20 per 1,000 sq. ft. had been used; the result would have been 580 daily vehicular trip ends, instead of 399, likely resulting in impacts beyond those identified in the TIS.

2. Internal Trips:

The LHR TIS Internal Trip Generation calculations are flawed and overstate the internal trip capture. The fundamental errors enumerated below substantiate that external traffic flows have been understated in the LHR TIS. The additional external vehicle traffic will compound the already marginal road conditions that exist on Covey Lane and Mountain Ridge Private Roads, as well as all other Project Access points to West Lilac and Circle R Public Roads, and the entire Road Network that services the area. The Traffic Study needs to be corrected to reflect these changes.

In reference to Table 4.9 on Pages 54 and 55 of the TIS:

The calculation of internal trips for the AM peak hour and for the PM peak hour is fundamentally flawed. By definition for a trip to be internal, both the origin and destination of the trip must be within the project. Therefore, the number of internal trip origins in the AM peak hour must equal the number of internal trip destinations in the AM peak hour. Likewise, the number of internal trip origins in the PM peak hour must equal the number of internal trip destinations in the PM peak hour. As an example, if there are 150 internal trip origins in the AM peak hour, but only 100 internal trip destinations are available, there can be only 100 internal trips. The remaining 50 origins cannot be internal, and would necessarily need to have external destinations.

**Table A
COMPARISON OF TRIP GENERATION IN TIS TO SANDAG MODEL**

Land use Category	Table 4.8 in TIS	Daily Vehicular Trips Appendix F	Difference
Residential Uses			
Single Family	9,030	6,240	-2,790
Multi Family	2,250	1,764	-486
Senior Community	1,872	2,025	153
Assisted Living	500	506	6
Residential Subtotal	13,652	10,535	-3,117
Non-Residential Uses			
Specialty/Strip Commercial	2,460	7,380	4,920
Office	399	580	181
B&B/Inn	450	502	52
Church	321	434	113
K-5 School	909	1,183	274
6-8 School (a)	185		-185
Recreation Center (a)	915		-915
Neighborhood/County Park (a)	119		-119
Water Reclamation (a)	14		-14
Recycling Center	4	18	14
LH YMCA (b)		601	601
LH Active Park (b)		482	482
Other Public Service (b)		29	29
Non-Residential Subtotal	5,776	11,209	5,433
TOTAL	19,428	21,744	2,316
(a) Not used in SANDAG Model			
(b) Not used in TIS Increase of 11.9%			

The methodology used in the TIS to estimate internal trips is fundamentally flawed because it results in an unequal number of origins and destinations in each peak hour. Table 4-9 indicates that in the AM peak hour there would be 261 "in" and 231 "out" trips, or origins and destinations, respectively. For the PM peak hour there would be 207 "in" and 189 "out" trips. Since the "in" (trip destination) and "out" (trip origin) numbers are not equal, adjustments are needed.

The revised estimates for internal trips are lower compared to the TIS, by 106 trips in the AM peak hour and 38 trips in the PM. Accordingly, external trips are underestimated in the TIS. Use of the correct peak hourly external trip numbers in the TIS, could have revealed additional impacts, beyond those identified in the TIS.

3. SANDAG Estimate of Internal Trips:

In reference to Page 53 of the TIS and Appendix F:

The 28.8% of internal trips attributed to the SANDAG model run (Page 53 of the TIS) is faulty because the model inputs are faulty. Table A attached presents a comparison of the vehicular trips estimated in Table 4.8 of the TIS (19,248 total daily vehicular trips), compared to the data presented in Appendix F (18,849 total daily vehicular trips). While the total numbers are reasonably close, there are large differences in the estimates for individual land use categories, as documented in Table A. Table A is showing a total of 21,7444 daily trips. In general, the trips for the residential categories are underestimated in the SANDAG model, while the commercial and office categories are overestimated. Since residential uses are typically considered trip productions in the model while commercial and office uses are considered to be trip attractions, the model estimate of internal trips is based, incorrectly, on a much higher number of potential internal attractions. The internal trip calculations need to be revised and the analysis corrected.

4. Roadway Capacity Assumptions under Existing Conditions:

In reference to Table 3.1 on Pages 28 through 30 and text on Pages 19 through 22:

The Level of Service calculations in the TIS are flawed and need to be corrected to reflect the correct project internal trip capture and capacity of each road.

The daily roadway capacity assumptions for existing conditions are based on the incorrect premise that the roadways are built to the full design standards of the applicable classification. In Table 3.1 the Level of Service (LOS) D threshold for 2-lane facilities without a two-way left turn lane is assumed to be either 8,700 or 10,900 with the exception of Valley Center Road and Miller Road (assumed to be 13,500 and 8,000, respectively). There is no indication in the TIS that, in fact, West Lilac Road Circle R Drive, Lilac Road, Old River Road, and other roadways, are not built with the appropriate design features, such as paved shoulder width, sight distance, design speed, curve radii, pavement thickness etc.

The compliance of the existing roadways with the appropriate design standards should have been ascertained if these LOS traffic volume thresholds were used in the TIS. If the facilities are not built with the applicable standards, the LOS traffic volume thresholds should have been reduced.

5. Interchange at I-15/SR-76:

In reference to Page 36:

The I-15/SR-76 Interchange is presently under construction and under the jurisdiction of Caltrans. Impacts and mitigation will require Caltrans concurrence.

Contrary to the statement at the bottom of the page, the ramp terminals at the interchange of I-15/SR-76 are signalized and should have been analyzed for all scenarios. Had they not been signalized, they should have been analyzed as stop-controlled intersections in the same way the interchanges at I-15/Old Highway 395 and I-15/Gopher Canyon Road were analyzed. The results should have been presented in Table 3.2 on Page 34, along with the other interchanges. The applicable analyses should have been performed for all future scenarios.

6. Project Access:

The TIS proposes an intersection with West Lilac Public Road (we shall refer to it as Access Point X) for which there is no road or intersection design disclosure or traffic analysis provided.

For purposes of this discussion the project access point on West Lilac Road approximately mid-way between Main Street (Intersection 26) and Street F (Intersection) will be referenced as Access Point X. Please see Figure 1-3 on Page 4 of the TIS for the location of Access Point X and the circulation system it would serve.

In the TIS, the analysis assumes the presence of Access Point X (described in the previous paragraph), yet the intersection of West Lilac Road and Access Point X is not analyzed in any of the scenarios. Judging from the trip distribution percentages presented in Section 5 of the TIS, Access Point X would accommodate 20 to 40 % of the project traffic. As an example, the information in Figure 4-10A indicates that about half of the traffic to/from Phase A would use Access Point X.

The intersection of West Lilac Road and Access Point X should have been analyzed and appropriate improvements, if any, should have been identified.

The TIS proposes an intersection with Lilac Hills Ranch Road at Covey Lane existing Private Road for which there is no road or intersection design disclosure or traffic analysis provided.

Lilac Hills Ranch Road (LHRR) is the major internal north/south roadway for the proposed LHR subdivision. LHRR is the route to access the LHR Project's Secondary Access Roads, the existing Covey Lane and Mountain Ridge Private Roads.

Accretive has provided NO DETAIL of the Road Design for Covey Lane and/or the Intersection of LHRR and Covey Lane. These are the secondary access roads for compliance with the county's consolidated fire code!

This intersection's design is not disclosed whatsoever and raises two fundamental Traffic and Road Design issues:

1. Site review of the intersection indicates there is inadequate sight distance line and other design considerations that indicate the intersection do not meet County Road Standards.
2. By not disclosing the design details of the LHRR/Covey Lane intersection:
 - a. Environmental Impacts are impossible to assess.
 - b. Conformance to the County of San Diego Road Standards is impossible to assess.

7. Roundabouts:

The presence of roundabouts at the intersections of West Lilac Road/Main Street, West Lilac Road/O Street, and Main Street/C Street is assumed starting with Phase A of project development (Please see Table 5.2, Pages 95 through 98, Intersections 26, 27, and 31). Yet, the roundabouts are not included in any of the "Impact and Mitigation Summary" Tables, starting with Table 5.6 on Page 103 of the TIS.

The roundabouts should be in place before the issuance of the first Certificate of Occupancy in Phase A, and the developer responsibility should be clearly stated. The design speed and the right-of-way requirements for the roundabouts should be identified. It is not clear in the TIS if the roundabouts are going to be located entirely on Lilac Hills Ranch property. These matters should be specifically addressed in the mitigation section of the DEIR and/or FEIR, and should not be deferred for subsequent determination.

8. Mitigation Measures:

The following are comments on the adequacy of the mitigation measures and need to establish thresholds for compliance.

- Table 5.6 on Page 103 identifies no improvements for Phase A of the project. As stated earlier, roundabouts at the intersections of West Lilac Road/Main Street, West Lilac Road/O Street, and Main Street/C Street should have been specified as improvements to be in place before the issuance of the first Certificate of Occupancy.
- Table 5.13 on Page 122 refers to "Phase 4" for the two recommended improvements for Phase B, but the TIS does not explain what Phase 4 represents; nor do the TIS explain how the number 363 EDU was determined.

- Table 5.21, Page 141, recommends that West Lilac Road between Old Highway 395 and Main Street be improved to 2.2C standards by 929 EDU or 9,298 project ADT's in Phase C. As stated earlier for Phase B, the TIS does not explain what Phase 4 represents; nor does the TIS explain how the number 929 EDU was determined. Also, a limit of 9,298 ADT would allow the development of all of the residential uses (except assisted living) through Phase D, without the development of any of the non-residential uses in Phase D or earlier, resulting in 8,952 ADT (Please refer to Table 4.7). Since the stated goal is for the project to achieve a mix of residential and non-residential uses, this threshold is not in the best interests of the County or the residents of Lilac Hills Ranch. The threshold should be defined in a different way, such that the developer is encouraged, or forced to, bring in non-residential uses in parallel with the residential uses. The same comments apply to the timing of the signalization of the intersection of Old Highway 395/ West Lilac Road, albeit with a different threshold.
- On Page 123 of the TIS and in Table 5.14 on Pages 128 through 130, direct impacts are identified for Phase C on Gopher Canyon Road (between East Vista Way and the I-15 Southbound ramps) and on East Vista Way (between Gopher Canyon Road and Osborne Street). Table 5.21, Page 141, however, does not recommend any improvements for these roadway segments. The rationale for not recommending improvements includes, among other things, "Rural community character," "Minimal project trips added" and "Distance from project site." This rationale is not very convincing because the "No Project" or "Much Lower Intensity Project" alternatives would be more compatible with the ambient rural community character and would result in no or much fewer trips. The TIS should have identified the necessary improvements and should have left it to policy-makers to decide whether the improvements to mitigate direct project impacts should be required of the developer or waived. Without any improvement recommendations, policy-makers have no frame of reference to make an informed decision.
- In Table 5.29 on Page 160, no improvements on Gopher Canyon Road (between East Vista Way and the I-15 Southbound ramps) and on East Vista Way (between Gopher Canyon Road and Osborne Street) are recommended for Phase D, even though, as in the case of Phase C, direct impacts have been identified. The same rationale as for Phase C, and equally as faulty, has been used not to recommend any improvements. As in the case of Phase C, the improvements should have been identified and the decision to accept or waive them should have been left to the policy-makers.

In Table 5.29, continued on Page 161, the threshold for the signalization at Old Highway 395/Circle R Drive refers to Phases 4 and 5, which are not explained in the TIS.

- In Table 5.30 on Pages 167 through 169, and on Page 177, direct impacts are identified in Phase 5 (Buildout of Project) on Gopher Canyon Road (between East Vista Way and the I-15 Southbound ramps), on East Vista Way (between SR-76 and Gopher Canyon Road) and on East Vista Way (between Gopher Canyon Road and Osborne Street). However, in Table 5.36 on Page 179, the same rationale as for Phases C and D, and equally as faulty, has been used not to recommend any improvements. As in the case of Phases C and D, the improvements should have been identified and the decision to accept or waive them should have been left to the policy-makers.
- In Table 6.9 on Page 226, it is recommended that Gopher Canyon Road (Between East Vista Way and the I-15 Southbound ramps) be improved to 4.1 A per the Mobility Element because of a cumulative impact. The existing traffic on this roadway segment is 15,310 vehicles per day (vpd). The cumulative projects would add 370 vpd and the proposed Lilac Hills Ranch project would add 580 vpd, for a total of 16,260 vpd, resulting in LOS F, properly identified as a cumulative impact.

When the Lilac Hills Ranch traffic (at project buildout) was added to existing traffic the total was 15,890, resulting in LOS E and a direct impact was correctly identified (Please see Table 5.30 on Pages 167 through 169). However, no improvements were recommended because of among other reasons "Rural Community Character." Yet, under cumulative conditions a widening to 4 lanes is recommended, even though the cumulative projects collectively would add less traffic (total of 370 vpd for all cumulative projects combined) than the proposed project (580 vpd). No reason is given as to why "Rural Community Character" would no longer be an issue.

9. Traffic Volumes on Mountain Ridge Road and Covey Lane:

My evaluation of the traffic volumes based on revised trip generation and internal hip capture lead to the conclusion that both roadways traffic volumes will exceed the County's 2,500 ADT. Threshold for private roads and will require additional improvements.

	LHR TIS ADT (1)	Assessed ADT
Covey Lane (Private Road):	1,110	Over 2,500
Mountain Ridge Road (Private Road):	2,220	Over 2,500

(1) Values are from the LHR TIS Table 7-1

10. Independent Analysis of Traffic Volume on Mountain Ridge and Covey Lane Secondary Access Roads:

As described on Page 240 of the TIS, the traffic volume forecasts for the horizon year were developed using a hybrid methodology. With the hybrid methodology, the SANDAG Series 12 model forecasts (for 2050) were used for freeways, and the County General Plan (based on SANDAG Series 10 for 2030) traffic volume forecasts were used as the starting point for traffic volume forecasts for Mobility Element Roadways (MER). These base (starting point) traffic volumes were used to develop traffic volume forecasts for other horizon year scenarios. The "Selected Zone" analyses for the proposed Lilac Hills Ranch project were based on the Series 12 model.

In the TIS, there are flaws in the application of the hybrid methodology, and the hybrid methodology itself introduces certain inconsistencies. Because of the flaws in the application and the inconsistencies inherent in the hybrid methodology, the horizon year traffic volume forecasts in the TIS are not reliable.

10a. Flaws in the application of the Hybrid Methodology:

Assuming for purposes of this discussion that the hybrid methodology does not have any inconsistencies, even though it does (see discussion below) there are flaws in the application of the methodology, discussed in the following bulleted paragraphs.

- Figure 9-2, on Page 245 of the TIS, presents "Roadway Average Daily Traffic Volumes-Horizon Year Base Conditions with Road 3". The traffic volume forecasts in Figure 9-2 do not match the traffic volumes shown in the SANDAG Model plot "County of San Diego GP Update EIR--2030 Planning Commission Recommended LOS and Volume Plot - Valley Center Area - 2030 Proposed Network, Model Run 09/03/10, Without Road 3A.

Examples of discrepancies (between Figure 9-2 and the GP Plot) in forecast daily traffic volume (not an all-inclusive list) are:

Location	<u>Figure 9-2</u>	<u>GP Plot</u>
W. Lilac Road, east of Old Highway 395	8,110	11,400
Circle R Drive, east of Old Highway 395	6,640	6,100
Old Castle Road, east of Old Highway 395	7,780	12,600
Old Highway 395, north of W. Lilac Road	13,790	16,500
Old Highway 395, south of W. Lilac Road	19,520	20,800
Old Highway 395, south of I-15 NB Ramps	13,960	14,300
W. Lilac Road, north of Circle R Drive	1,130	1,900

No explanation for these discrepancies is provided in the TIS. The GP plot forecasts are generally higher than those in Figure 9-2. Therefore, whatever "smoothing" or "averaging" process was used for the adjustments, the net effect would be understatement of project impacts in the horizon year. A very clear example is W. Lilac Road. The GP Plot presents forecasts at two locations between Old Highway 395 and Main Street: 11,400 and 11,000. There is no justification for using 8,100 vehicles per day (vpd) as the base forecast in Figure 9-2 or in Table 9-1 on Page 242 in the TIS.

- Since the forecasts in Figure 9-2 are used as the base for estimating traffic volumes for other scenarios, the effect is carried forward throughout the horizon year analyses.
- Figure 9-3, on Page 249 of the TIS, presents "Roadway Average Daily Traffic Volumes - Horizon Year Base Plus Project Conditions with Road 3". In Figure 9-3 and in Table 9-3 on Page 251, the traffic volume forecast for W. Lilac Road between Old Highway 95 and Main Street is given as 18,990 vpd, just below the LOS E volume threshold of 19,000. If the correct base of 11,400 vpd had been used instead of the incorrect base of 8,110 vpd, the total traffic volume forecast would have been 22,200 vpd, resulting in LOS F.
- Figure 9-4, on Page 267 of the TIS, presents "Roadway Average Daily Traffic Volumes - Horizon Year Base Conditions without Road 3". In Figure 9-4 and in Table 9-7 on Page 263, the traffic volume forecast for W. Lilac Road between Old Highway 95 and Main Street is given as 1,870 vpd. Compared to the incorrect base of 8,110 vpd for this roadway segment, the difference of 6,240 vpd is attributable to route diversions due to the removal of Road 3. If then the reduction of 6,240 vpd is applied to the correct base of 11,400 vpd, the correct base traffic volume forecast for this condition would be 5,160 vpd. Since no explanation is presented about how the diversions were calculated, the validity of the numbers in this figure cannot be ascertained.
- In Figure 9-4, on Page 267 of the TIS, the traffic volume forecast of 5,030 vpd on W. Lilac Road just east of the project does not make sense because the traffic volume on Covey Lane is 200 vpd and the traffic on W. Lilac Road south of Covey Lane is 2,730 vpd. These two combined represent less than 3,000 vpd. So where is the rest coming from that makes up the forecast of 5,030 vpd?
- Figure 9-5, just before Page 268 of the TIS, presents "Roadway Average Daily Traffic Volumes - Horizon Year Base Plus Project Conditions without Road 3". In Figure 9-5 and in Table 9-9 on Page 269, the traffic volume forecast for W. Lilac Road between Old Highway 95 and Main Street is given as 13,370 vpd, resulting in LOS D. If the correct base of 5,160 vpd had been used instead of the incorrect base of 1,870 vpd, the total traffic volume forecast would have been 16,660 vpd, resulting in LOS E (instead of LOS D as Chen Ryan reports), indicating a traffic impact.

10b. Inconsistencies in the Hybrid Methodology:

The planning horizon year for Series 12 is 2050. The County's General Plan, which the proposed project is seeking to amend, has a horizon year of 2030 and the traffic forecasts are based on the SANDAG Series 10 Regional Model. This difference in planning horizon years and the use of two different model Series introduces inconsistencies into the process of developing the horizon year forecasts in the TIS.

- The traffic forecasts for the freeways are based on Series 12 whereas the forecasts for the arterials are for 2030. There is no indication in the TIS that traffic volumes on surface streets in the vicinity of freeway interchanges were reviewed to ensure consistency with traffic on the freeway ramps. If the freeway ramp volumes are different in Series 10 and 12, adjustments on the surface streets would have been necessary. Since the Series 12 freeway volumes have been "calibrated" by SANDAG, the adjustments would need to be on the surface streets.
- County staff has indicated that SANDAG has used County General Plan full development land uses for both the Series 10 and Series 12 Model runs. However, there is no indication in the TIS that population and employment numbers by TAZ were compared to ensure that they are consistent. Since the TIS is going to be used to amend the Mobility Element (deletion of Route 3, changes in classification of some roads) in addition to assessing the traffic impacts of the proposed Lilac Hills Ranch project, it is essential that the TIS is using the correct tool (s) for the analysis.
- There is no indication in the TIS whether the Series 12 socio-economic projections for the incorporated areas near the Bonsall and Valley Center Planning Areas were reviewed to ensure that they are not substantially different in Series 12 compared to Series 10. Since there is and will continue to be substantial traffic interaction between the unincorporated areas and the municipalities (Escondido, Vista, Oceanside) for such purposes as work, shopping, medical, college/university, recreation, and others, it would be necessary to make such reviews before confidence can be placed in the hybrid methodology.
- The traffic forecasts for the roadways in the vicinity of the proposed Lilac Hills Ranch project would be a function of the socio-economic data forecasts. The TIS should have investigated and documented appropriate information to ensure that the hybrid methodology would be appropriate for a General Plan

Amendment that involves the removal of a Mobility Element roadway without thorough review and evaluation, the validity of the tool used in the analyses cannot be ascertained.

- The selected link analyses used for allocating horizon year project trips to the roadway network were based on the Series 12 model. For the reasons outlined above, the reliability of the selected link runs cannot be ascertained.

In summary, the hybrid methodology used to prepare the horizon year traffic forecasts is not reliable because the process has inherent inconsistencies, because there were instances where the methodology was used incorrectly, and because thorough review, comparison, evaluation, and documentation of the two different model series is lacking. As a result, the traffic forecasts presented in the TIS are not reliable. A decision to make General Plan Amendments should be made using reliable forecasts developed with the appropriate tools.

10c. Comments on Direct Impact Mitigation:

- The Mitigation of the LHR Direct Impacts has been identified as installing traffic signals at:
 - a) Old Highway 395 / W. Lilac Road intersection -signalized;
 - b) Old Highway 395 / Circle R Drive intersection -signalized;
 - c) I-15 SB Ramps / Gopher Canyon Road intersection -signalized; and
 - d) I-15 NB Ramps / Gopher Canyon Road intersection -signalized.

Each of the above intersections needs to be assessed to identify the need to add turning lanes at each of the intersections.

ROAD STANDARD DESIGN EXEMPTION REQUESTS

11. The project proposes ten (10) Design Exceptions to County Road Standards. I have reviewed the Design Exceptions and have the following general comments and specific comments on each Design Exception. The approval of the Design Exceptions by the County needs to consider the safety and liability related to each request. The safety and liability related to the public roadways as well as the future residents within the Lilac Hills Ranch responsibility for the private roads. The following are my comments on each Design Exception request.

1. West Lilac Road Bridge over I-15:

The proposed modification of the Bridge crossing over I-15 will require the approval of the California Department of Transportation (Caltrans) for compliance with design requirements and design exception procedures. Based on my experience with working on similar projects, any approval must come from Caltrans Headquarters in Sacramento. Therefore the approval of the Design Exception requested should not be approved until Caltrans concurrence is received.

2. West Lilac Road from the I-15 to Highway 395:

The amount of grading and necessary rights of way to accommodate the required improvements needs to be verified. The Design Exception also needs to be required to show the required improvements to include the addition of left turn lane on West Lilac Road at its intersection with Highway 395.

3. West Lilac Road from the Project Boundary to the I-15 Bridge:

The proposed Design Exception proposes the reduction in the shoulder area from 8 feet to 6 feet and placement of a retaining wall on the northside of Lilac Hills Ranch Road to provide a 2 foot separation from the curb and gutter. Both of these conditions need to be assessed by the County regarding safety and liability to not provide sidewalk/parkway on the northside of the road in the reduced shoulder areas.

4. West Lilac Road from the westerly roundabout to the northerly boundary:

The justification for this Design Exception is that the ADT is very low. This is not true. The ADT with the project will be over 12,000.

5. West Lilac Road (Along the North Project Boundary Modified 2.2F Section):

The proposed cross section is unclear. As a minimum the required minimum of 28 feet of pavement should be constructed. It is recommended that the alignment of Lilac Hills Ranch Road be reviewed to keep the required travel lanes and shoulder by moving the roadway to the south.

6. West Lilac Road (East of the Easterly Roundabout) Modified 2.2F Section:

The construction of the Roundabout is proposed for traffic calming. The alignment of West Lilac Road and the Roundabout should be placed to not require any Design Exception.

7. Reduced Design Speed on Mountain Ridge Road:

The County of San Diego Private Road Standards requires a vertical design speed of 30 MPH. The request to reduce the vertical speed to 15 MPH should only be considered after the applicant has designed the required improvements and contacted the affected property owners to obtain the necessary rights of way. With full development of the project we estimate the traffic on Mountain Ridge Road to exceed 2,500 ADT and require construction pursuant to the County's Public Road Standards.

8. Mountain Ridge Road at Circle "R" Drive Taper:

The intersection Taper is a small problem. The existing alignment of Circle "R" Drive which is not within the existing road easement needs to be resolved first. If the existing road is to remain outside its dedicated rights of way, the applicant/County needs to determine the recommended ultimate location of Circle "R" Drive.

9. Street C Modified Section:

The request to reduce the vertical design speed to 20 MPH from 25 MPH needs to be clarified and identify for the limits of the design speed reduction as well as the impact on the remainder sections of Street C.

10. Street E – Modification Section:

The request to reduce the vertical design speed to 20 MPH from 25 MPH needs to be clarified and identify the limits of the design speed reduction as well as the impact on the remainder sections of Street E.

12. Cumulative Projects

Review of Table 6.1 Cumulative Projects Page 191 Map Key #123 Orchard Run Major Subdivision (296 Lots) is identified as withdrawn. The Orchard Run Project is a valid project and needs to be included. The addition of this project will add significant volume traffic to West Lilac Road.

In addition to the Orchard Run Project, recent Indian Casino Projects need to be included in the cumulative analysis.

13. Traffic Impact Fee

The Traffic Study and DEIR identify the payment of the County Traffic Impact Fee (TIF) to mitigate the projects cumulative impacts. Since the current TIF did not include the LHR in its analysis, the project needs to be conditioned to update the County TIF prior to issuance of building permits.

At the time the DEIR and/or revised Traffic Study is completed I reserve the right to review and provide additional comments based on the recirculated DEIR and/or Final EIR for the project.

Please feel free to contact our office should you have any questions.

Sincerely,

DARNELL & ASSOCIATES, INC.

Bill E. Darnell, P.E.

RCE: 22338

August 16, 2013

Date

Mr. Mark Jackson
August 16, 2013
Page 15

10. Street E – Modification Section:

The request to reduce the vertical design speed to 20 MPH from 25 MPH needs to be clarified and identify the limits of the design speed reduction as well as the impact on the remainder sections of Street E.

12. Cumulative Projects

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Please feel free to contact our office should you have any questions.

Sincerely,

DARNELL & ASSOCIATES, INC



Bill E. Darnell, P.E.
RCE: 22338



Date

8/16/2013

LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017
(STP), 3500.12-018 (STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT EIR PUBLIC REVIEW PERIOD
July 3, 2013 through August 19, 2013

DRAFT EIR COMMENT SHEET

Thursday, August 1, 2013
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

I have some concern about the proposed development. first, the density of units on the property does not match the current zoning or large lot appeal of the area. Secondly, Traffic would jam the road and impact a large area. Region of current home/land owners. Develop within the current master plan to preserve the appeal of the area for everyone.

(Attach additional pages as needed)

Dale T. DeLaaney 8-14-13
Signature Date

Dale T. DeLaaney
Print Name

2030 Camino Drive
Address

Escobedo CA 92026
City State Zip Code

619 520-1335
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX #: (858) 694-3373
e-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 19, 2013

Mark Slovick

August 19, 2013

County of San Diego

Planning & Development Services

RE: Accretive / Lilac Hills

Dear Mr. Slovick,

I am a resident that will be directly affected by the Lilac Hills development proposed by Accretive. We moved here in 2003 with promises of Valley Center remaining rural which would accommodate our small horse ranch and wishes for an open rural way of life. My husband had retired and we figured we were set for the rest of our lives, living the dream we worked so hard for, for so many years.

Valley Center has always attracted 'Horse People' for obvious reasons and it's heartbreaking that these developers can take it away from us. NO WHERE in their planning have they considered the horse people who built this area! No trails, no equine facilities, no consideration at all of those of us who came here for one reason; OUR HORSES!!

We own property on a supposed 'private road' and it seems as though there is so much fine print we were unaware of that they can actually come in and take it away from us. Even after our huge financial investment in beautifying the property, maintaining the road and making it our HOME with HUGE also carries huge taxes!

We experienced the evacuations in 2003 and 2007 and are very afraid of evacuation difficulties if our neighborhood is impacted with thousands more cars and scared people trying to get OUT of these small, tucked away roads, many of which are single lane. It is crazy to think this area could manage a wild fire with the impact of this development.

Our roads are inadequate for general traffic safety as it is. The impact of traffic from so many residents will stutter flow to a halt and I'm afraid the bridge would be unable to withstand it.

Water is a HUGE concern as well; seems very hypocritical that developments of this magnitude is even considered when our water needs are such an issue.

I would sure like to have someone explain to me HOW a 12 year, 18 million dollar Update Project by the Board of Sups can just be changed and/or voided?? It is simply astounding!!

Obviously we are VERY OPPOSED to this project and are begging for its planning to be shut down and moved to a more appropriate location.

Sincerely,

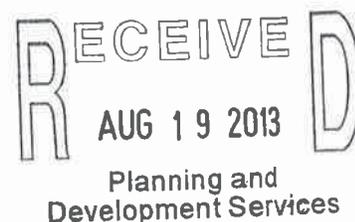
Annie & Joe DiMeglio, 10115 Covey Lane, Esc, CA 92026

Lilac Hills Ranch
Draft EIR Comments

3800 12-001 (GPA), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017 (STP), 3500 12-018 (STP), HLP XX-XXX, SCH 2012061100 ENVIAL LOG NO: 3910 12-02-003 (ER)

DRAFT EIR PUBLIC REVIEW PERIOD
JULY 3, 2013 THROUGH AUGUST 19, 2013

COUNTY OF SAN DIEGO
PLANNING AND DEVELOPMENT SERVICES
5510 OBERLAND AVENUE, SUITE 310
SAN DIEGO, CA 92123



Comments and Questions

Easements:

- 1) I have concerns that LHR (Lilac Hills Ranch) does not have adequate easement rights over Mountain Ridge for all of the properties in the development. They have previously claimed to have the right to be able to grant easements to other parcels across Mountain Ridge that is not supported by the documents they provided to the owners (of which we are one of the property owners) of the Circle R Ranch Estates development. The recorded documents (grant deeds) from the 1950s listing the Goodwins (owners of the property now known as Rodriguez Ranch) as reserving that right is not supported as the Goodwins did not own the properties in Section 31 where the easements are located nor is there supporting documentation that they so had that right granted to them. Jon Rilling of LHR now states in a letter dated August 6, 2013, to the Circle R Ranch Estates homeowners that "Kevin Johnson stated "Amendment 10 of the PTR indicates Accretive may have limited rights granted in 1957 to use the Mountain Ridge private road for two parcels". Hence, the nearby properties to the north of Rodriguez Ranch nor any of the parcels in the northern portion of the development have the rights to utilize Mountain Ridge nor could they inherit or be granted that right through this development (LHR) from the Goodwin deeds. In that case, then:
 - a. How can LHR plan for or utilize Mountain Ridge for any use for the development in its entirety.
 - b. How can the development plan for or utilize Mountain Ridge as an emergency exit for the entire development when only two parcels have access over Mountain Ridge?
 - c. How can this development proceed at all if only two of the many parcels are the only parcels to have access over Mountain Ridge?
 - d. How can this development utilize any of the Rodriguez Ranch Rd outside of the development for those parcels that do not have any easement rights over that road such as the parcels in the northern development?

- e. Again, how can this development be approved when all of the parcels in the development do not have access over all of the private roads, whether for normal use or for emergency purposes or evacuation?
- 2) The private roads will be over-burdened based on the density of the development. How will the developer and the County of San Diego prevent that from happening?
- 3) Per Mark Slovak, the IODs along or on Mountain Ridge and Circle R from 1979 are no longer valid along with the Covey Lane et al IODs that are beyond 25 years old. How can those IODs be utilized by the County or the LHR developer that have expired or have been rejected by the County along with other IODs that have been rejected by the County?

Road and Traffic Concerns:

- 1) Mountain Ridge is steep and rolling and does pose line-of-sight problems. On several occasions, trash trucks and grove/packing house trucks have stalled and or broken down on the uphill section near the crest of the hill heading south within the Circle R Ranch Estates development. The road is also not aligned by about 5+ feet at the crest of the hill where the road transitions between Section 30 and Section 31. It is dangerous to pass when that situation exists as the misalignment causes the passing vehicle to move completely into the oncoming lane. There are no shoulder areas on the south bound side (westerly side) of Mountain Ridge, causing additional safety issues when a vehicle is blocking the south bound side. Within the Circle R Ranch development, Mountain Ridge has no shoulders at all for vehicles to move to so as not to block the travel lanes. The road is at its' maximum width within the graded section. How will this safety issue be resolved, especially with the traffic projections for this road?
- 2) Bicycle use – Circle R Rd, W Lilac from Camino Del Rey to the intersection with Circle to the intersection with Lilac is very heavily travelled on weekends by bicyclists. It is common to have individuals up to large groups (10 to 20 riders) on those roads on weekends. There are cyclists on weekdays but it is much lighter. The roads listed should be widened to accommodate the cyclists and not endanger them with significant traffic that will result from this development. There are several narrow and curving sections on all three road segments that are dangerous with the limited amount of traffic currently on the road segments. In addition, W Lilac from the intersection of Circle R and W Lilac has no shoulders or areas where cyclists can safely pull off to the side except for a few private driveways. Sight distances are also very limited for cyclists in these segments.
- 3) There are several very narrow sections in curves on Circle R and W Lilac. Those sections (bottlenecks) become very dangerous when vehicles larger than cars and pickups (semi trucks, delivery trucks, flatbed trucks, vehicles with trailers, RVs, boats etc.) are coming in the opposite direction. Some sections are extremely limited in width due to the hillside and the guard rails. Most, if not all of W Lilac has no guard rail on slope side of the road. When vehicles have been stopped or broken down in the narrow sections, it has backed up traffic even with the limited amount of travel as it currently is used.

There doesn't seem to be any mention to improve or eliminate the unsafe portions of the roads, especially with the increased amount of traffic that will be utilizing the roads. On 8/18/2013, a car went off the road in the narrow curving section of W. Lilac causing a traffic delay while the car was pulled up the hillside. Why is the developer not being required to improve the unsafe sections of these roads considering the amount of traffic the development will generate?

- 4) Morning commute traffic to the VC High School will over burden the W Lilac Rd and Lilac Rd to Old Castle/Lilac Rd, making the commute extremely long. According to the traffic study, there will be in excess of 250 trips to the VC High School in the morning. If you make the assumption that the length of an average car plus a safe distance front and rear would give you approximately 50 feet in length, times 250 cars, equates to about 12,500 feet long or 2.3+ miles in length. Traveling on the narrow and curving bottleneck sections of W Lilac / Lilac would slow and perhaps pack the cars closer making for an even longer commute to the VCHS. In addition, there is already traffic congestion on Lilac Rd in front of the Lilac School on Lilac Rd. How will the traffic issues be mitigated (i.e. removing the bottlenecks) along with the corresponding the safety (no guard rails in the narrow steep areas) and additional emissions from the congestion and noise? What happens to the flow of cars if a car breaks down or has a flat tire in the narrow sections of W Lilac Rd or Lilac Rd?

- 5) The single lane I-15 north bound Gopher Canyon off-ramp is congested now. The north bound I-15 exit to Gopher Canyon currently backs up about half the length of the off-ramp on the evening trip home due to the majority of the traffic heading west on Gopher Canyon. If it weren't for the east bound Gopher Canyon traffic running down the right hand shoulder (which is illegal), the traffic would be backed up to I-15 itself.
 - a) How will the traffic signals relieve this safety issue?
 - b) How will the significantly increased east bound Gopher Canyon to Old 395 North traffic be managed safely and adequately?
 - c) Also, the current distance between the Gopher Canyon north bound off ramp right turn lane stop sign threshold and the Gopher Canyon left turn lane threshold to Old 395 North only allows about 8 to 10 cars.
 - i) How will this be rectified for the increased traffic load, especially with the off-ramps only being a single lane?
 - ii) What will be the increased level of emissions from the waiting cars?
 - iii) How will the increased level of vehicle emissions from the waiting cars be mitigated?

- 6) Circle R Rd (stop sign) at Old 395 currently backs up 10 to 15 cars in the morning with most of the cars heading south, and then turning right (west) on Gopher Canyon to either I-15 south or continuing west on Gopher Canyon. How will the stream of cars on Circle R Rd be adequately managed for wait times and emissions with the short distance between Circle R Rd and Gopher Canyon?

- 7) The traffic study does not indicate that the I-15 exits to Old 395 will be signalized. Due to the single lane design of the off-ramps, they will impact each other due to the cross traffic each will generate towards the other exit. It is very possible that there will be a backup on I-15.
 - a) How will the potential traffic backup on to I-15 be mitigated?
 - b) What will be the level of emissions of waiting cars and how will the emissions be mitigated?
- 8) I-15 north bound traffic slows significantly (or stops completely – stop n go) under the Lilac Bride over I-15 during the evening commute. With the developments currently approved for the I-15 / Hwy 76 area:
 - a) How will the traffic and emissions from LHR be mitigated?
 - b) What will the level of additional emissions be?
 - c) What will be done to mitigate any additional health issues and traffic congestion?
- 9) How will the County guarantee that any temporary sewer lines will be removed within the estimated development window the developer has proposed?
- 10) How will Rodriguez Ranch Rd be utilized that is not within the development?
- 11) How will Rodrigues Ranch Rd that is not within the development be improved?
- 12) How will Mountain Ridge Rd be improved?
- 13) How will the misalignment of Mountain Ridge Rd between Section 30 and Section 31 be corrected with the limited area available for grading based on the easement widths and considering the cuts and fills already in place?
- 14) The vehicle traffic from the northern portion of LHR will be significant on Circle R Rd heading west:
 - a) How will this traffic impact the vehicles exiting Mountain Ridge and what will be done to eliminate any delays?
 - b) How much will be the additional wait times for vehicles exiting Mountain Ridge on to Circle R?
 - c) What will be the additional emissions from those vehicles?
 - d) How will the emissions be mitigated?
 - e) What are the effects to the neighboring properties and population with the increased emissions and noise?
 - f) The sight lines in both directions are inadequate and unsafe now, how will this be rectified?
- 15) For the southern part of the development (Phase 5) that will be gated, there are plans for a church and senior care facility. How will the developer control and mitigate public traffic for those facilities. What is the point of gated access if the facilities are available to the public? The developer states the following in a recent letter to us:

Only the church and residents of this exclusive gated senior neighborhood would be allowed to access Mountain Ridge Road. The remainder of Lilac Hills Ranch will not access Mountain Ridge Road.

- 16) We currently have road easements for Mountain Ridge Rd in the LHR development up to the intersection of Rodriguez Ranch Rd. The developer shows grading and homes on approximately the northerly half of the road easement. How can they invalidate our easement rights?
- 17) If there is a major fire in the Valley Center area and evacuation is required as in the 2007 fire, evacuation could be severely hampered with the road designs. How can this be rectified?
- 18) How does lowering the speed limit on Mountain Ridge cause the road to handle more traffic? Does that not make it worse? Does not the road design need to match the traffic volume?

August 19, 2013

William R. Ewing

9741 Adam Ct

Escondido, CA 92026

760 749-3711





August 6, 2013

Mr & Mrs William Ewing
9741 Adams Ct
Escondido, CA 92026

VIA CERTIFIED MAIL

Dear Mr & Mrs Ewing,

I am sending this letter to continue to provide information regarding the future Lilac Hills Ranch Community. In attempts to get your feedback over the past year, we provided you with a copy of the Draft Specific Plan in October, 2012 and subsequently sent you a link to download the updated versions in February and July of this year. We also offered to meet with your HOA to present the details of Lilac Hills Ranch in October of last year and would like to extend the offer again to meet with you and answer any questions and/or direct you to the County for more information.

In addition, you have received the notice that the environmental impact report was released for public review on July 3. To help encourage you to meet with us in person, I am providing a summary of our plans for Lilac Hills Ranch with details on how Mountain Ridge Road will serve a small portion of the community.

Lilac Hills Ranch Summary:

As planned, the northern portion of the community is a traditional neighborhood, oriented around a town square (north of Covey Lane and South and West of West Lilac Road). The southern portion is comprised of an Age Restricted Senior Citizen Neighborhood (north of Mountain Ridge and south of Covey Lane).

Traditional Northern Community:

The traditional neighborhood consists of 1,278 homes around a small mixed-use Town Center (think Julian meets Healdsburg) with boutique retail. The Town Center would include traditional businesses such as a market, sidewalk cafes, restaurants, a Country Inn with a banquet facility and other businesses. In addition, we have planned for a K-8 school, a recreation center, and a large 12-acre public park with multi-use fields located between the Town Center and the Senior Neighborhood (in the middle of Lilac Hills Ranch). The community will also include numerous smaller neighborhood parks and over 20 miles of walking trails open to the public. These linkages will serve to connect all residents in the area to the amenities inside of Lilac Hills Ranch and into the surrounding neighborhoods.

Senior Neighborhood & Mountain Ridge Road:

As stated above, the southernmost portion of the Lilac Hills Ranch Community will consist of a private, gated senior neighborhood. The senior neighborhood will provide all the essential services and activities that many senior citizens desire or require including a senior (activity) center with a pool, tennis courts, parks, trails, church and an Assisted/Group Living building that will provide primary medical care and services.

August 6, 2013

Page 2 of 2

Per the enclosed plan, approximately one third of the Senior Neighborhood is planned as an exclusive gated enclave bordering Circle R Estates. This exclusive southerly portion would have two gated entrances - one from the north, through Lilac Hills Ranch, and one from the south following an existing 40-foot private road easement over Mountain Ridge Road, which Kevin Johnson stated "Amendment 10 of the PTR indicates that Accretive may have limited rights granted in 1957 to use the Mountain Ridge private road for two parcels." Only the church and residents of this exclusive gated senior neighborhood would be allowed to access Mountain Ridge Road. The remainder of Lilac Hills Ranch will not access Mountain Ridge Road.

The projected traffic levels on Mountain Ridge Road, as described in our Traffic Impact Study, are below the County private road standards and the road improvements that we will construct on Mountain Ridge Road occur within our existing 40-foot road easement.

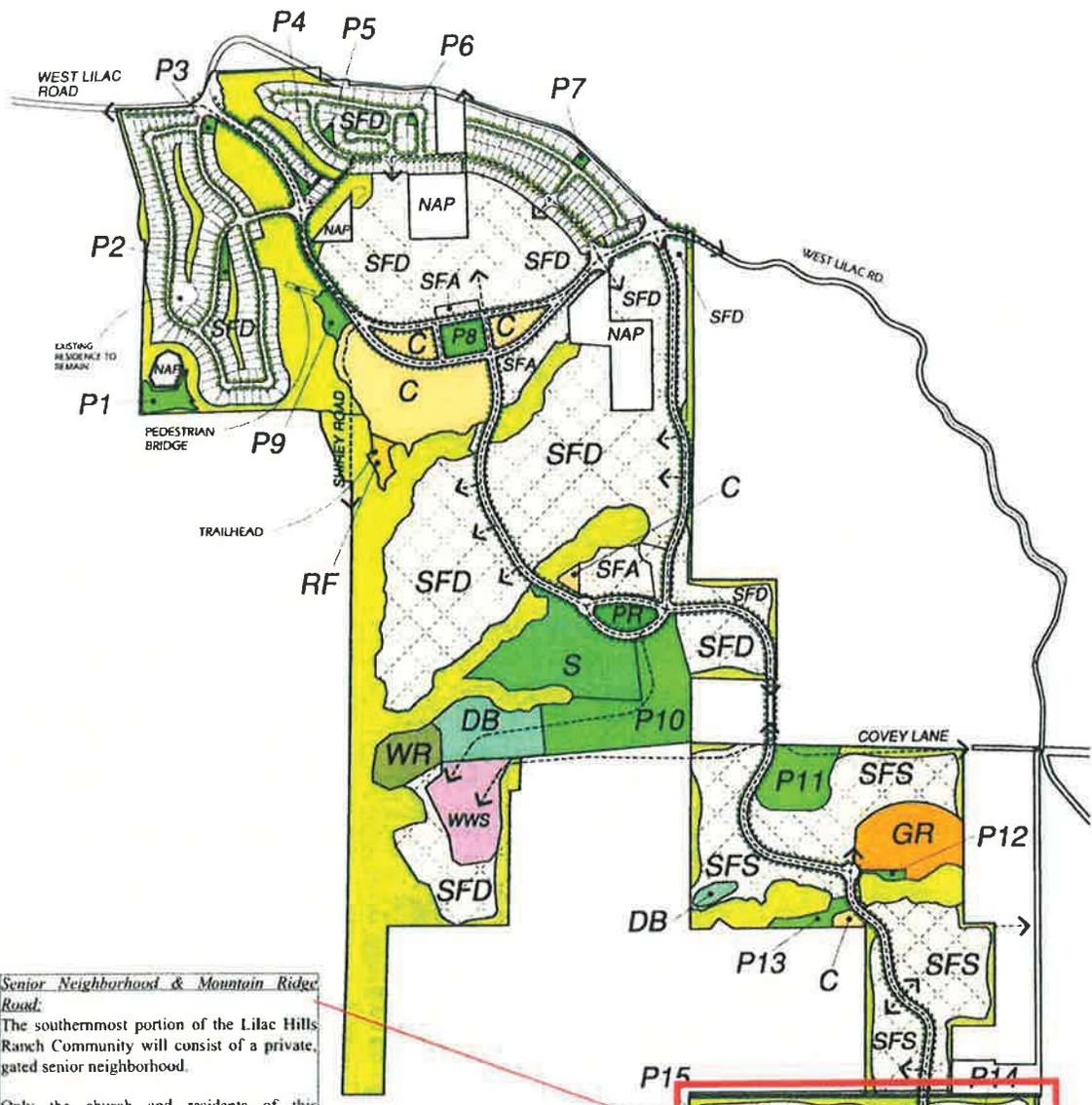
We have enclosed the conceptual landscaping plan for you and hope that we can sit down to discuss any comments or concerns in the next few weeks before the close of the public review period on August 19. Please feel free to contact me at (858) 345-3644 to schedule a convenient time to meet.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Rilling", with a long horizontal flourish extending to the right.

Jon Rilling
Project Manager
Vice President
Lilac Hills Ranch

LILAC HILLS RANCH

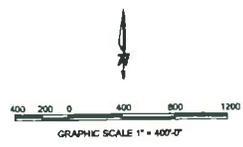


Senior Neighborhood & Mountain Ridge Road:
 The southernmost portion of the Lilac Hills Ranch Community will consist of a private, gated senior neighborhood.
 Only the church and residents of this exclusive gated senior neighborhood would be allowed to access Mountain Ridge Road. The remainder of Lilac Hills Ranch will not access Mountain Ridge Road.

- CONCEPT PLANT SCHEDULE**
- LIGHT COLLECTOR STREET TREE
 - RESIDENTIAL SINGLE FAMILY TREE
 - RURAL COLLECTOR STREET TREE
 - ACCENT STREET TREE
 - RESIDENTIAL COLLECTOR STREET TREE
 - VILLAGE GREEN TREE

LEGEND

RESIDENTIAL	SFA/SFD/SFS
COMMERCIAL/MIXED USE	C
SENIOR CENTER	SC
SCHOOL	S
WATER RECLAMATION	WR
RECYCLING FACILITY/ STAGING AREA/TRAIL HEAD	RF
PRIVATE RECREATION	PH
DETENTION BASINS	DB
PARK	P
INDEPENDENT LIVING / ASSISTED LIVING / DEMENTIA CARE	AL
INSTITUTIONAL/RELIGIOUS USE	I
OPEN SPACE / COMMON AREA / SLOPES	
WET WEATHER STORAGE AREA	WWS
CIRCULATION ROADS	



July 15, 2013

County of San Diego Planning & Development Services
5510 Overland Avenue, Ste. 110
San Diego, CA 92123

To Whom It May Concern:

This letter is in response to your Notice of Availability of a Draft Environmental Impact Report, Draft Habitat Loss Permit, General Plan Amendment and Specific Plan document dated July 3, 2013.

I noticed that only the communities of Valley Center, Fallbrook and Vista will have documents for review at their local libraries. However you should also add Escondido because part of the Lilac Hills Ranch proposal will affect some of Escondido's unincorporated addresses. I know, because my parent's home is in the middle of the proposed phase 1 and they have an Escondido address.

Until this notice, my parents have been somewhat disinterested; as they felt that whatever the plans it wouldn't affect them or their retirement lifestyle. They have lived in this neighborhood for 50 years with very little changes being done around them. Now, they are being asked to give up their right to their dead end easement to Accretive Investments, the developer, and persistently I may add. My parents have witnessed the deliberate mass transfer of private property and ranches to Accretive Investments. They certainly took full advantage of the economic slowdown and real estate valuation dips to acquire them.

Below is a list of our concerns with regards this project and its impact to our rural community:

1. Habitat of coyotes, quail, rabbits and other wild life will be greatly reduced. Misplacing of these animals is inhumane and reckless. My father enjoys sitting down in his recliner, on his front porch, to watch the birds and quail feed every morning. This won't happen if the wildlife is forced to move away and buildings all around.
2. Phase 1 of the project will affect my parent's property as it will be surrounded with new houses. They are currently surrounded by open fields and groves. They have no air conditioning and haven't required it with so many plants and trees cleaning and refreshing the air. Fresh air is abundant now but will be restricted by the building project which will cause poor air quality.
3. The General Plan Amendment (GPA 12-001), a Specific Plan (SP12-001, a Rezone (REZ 12-003), a Master Tentative Map (TM 5571 RPL 1) proposes to change the regional land use category from Semi-Rural (SR-4) to Village Residential (VR 2.9). This designation should not change for a resident that has been here since before this project was conceived. We request that the current category not change for existing residents and that it remain semi-rural. My parents are

not interested in changing the existing code of semi-rural designation or any of the existing building and fire codes that have been in effect for 50 years.

4. With regards the Water Reclamation Facility (WRF) (MUP 12-005) plans; if talking about rainwater harvesting, seems like a bad idea. The water belongs to everyone and should not be hoarded and not stolen from people and animals downstream. This has negative effects to the animals in the wild, the ranches and groves that depend on natural precipitation not to mention seasonal streams, brooks and creeks as well as private residences with fruit trees, lawns and shrubs. A much better alternative for potable water is to get an atmospheric water generator.
5. A big concern for my parents is the traffic congestion hundreds of households will create. I simply can't imagine how Lilac Road, a narrow two-lane road, can handle this massive increase in traffic. Lilac road cannot sustain the hundreds of vehicles if the project is approved. This includes Old Hwy 395. I would expect a great delay just getting onto the freeway. A traffic jam here is inevitable if existing plans are adopted. Lilac Road should be off limits to the new project and only accessible to existing residents. To reiterate, it should require a new access/exit point to Interstate 15 separate from Old Hwy 395 and Lilac Road.
6. The easement, Shirey Road, not only provides their access to the current main road (Lilac Road) it also gives us access to our utilities, electricity and water. My parents are retired and elderly. Giving up the easement will require utility moving expenses that are not included in their budget.
7. The easement is also a school bus stop. It's an easy access to and from a school bus without having a student cross a busy street.
8. Many of the proposed parks and trails in the project are for Lilac Hills Ranch owners via HOA; in other words not public parks. Of the fourteen project parks in plan, only one is open to the public.
9. The trails are unpaved and could be a risk for bike riders and pedestrians because of dust and rocks being kicked up or sliding on loose gravel. This is not ideal for those people, like my parents, who may want to learn to ride a bicycle.
10. The purpose of the project design is to get people out of their cars and walk. This may be wishful thinking. It is good to give prospective owners a choice on mode of transportation; however it should not penalize or restrict those that choose out of necessity or to live a different lifestyle. Please note that big families require a lot more groceries. That is more bags than can be carried home, if walking is required.

These are a few of the things that I noticed with regards to the impact on me and my family in the proposal for Lilac Hills Ranch. My parents have worked their entire lives for this home and to live their retirement years in quiet solace. If plan goes through, the landscape will be forever changed. What would you do if this were your parent's home?

Josie Ferrer

On Behalf of Hernandez 2003 Family Trust
32456 Shirey Road, Escondido, CA 92026

July 23, 2013

County of San Diego Planning & Development Services
5510 Overland Avenue, Ste. 110
San Diego, CA 92123

To Whom It May Concern:

This letter is in response to your Notice of Availability of a Draft Environmental Impact Report, Draft Habitat Loss Permit, General Plan Amendment and Specific Plan document dated July 3, 2013.

I noticed that only the communities of Valley Center, Fallbrook and Vista will have documents for review at their local libraries. However you should also add Escondido because part of the Lilac Hills Ranch proposal will affect some of Escondido's unincorporated addresses. I know, because my parent's home is in the middle of the proposed phase 1 and they have an Escondido address.

Until this notice, my parents have been somewhat disinterested; as they felt that whatever the plans it wouldn't affect them or their retirement lifestyle. They have lived in this neighborhood for 50 years with very little changes being done around them. Now, they are being asked to give up their right to their dead end easement to Accretive Investments, the developer, and persistently I may add. My parents have witnessed the deliberate mass transfer of private property and ranches to Accretive Investments. They certainly took full advantage of the economic slowdown and real estate valuation dips to acquire them.

Below is a list of our concerns with regards this project and its impact to our rural community:

1. Habitat of coyotes, quail, rabbits and other wild life will be greatly reduced. Misplacing of these animals is inhumane and reckless. My father enjoys sitting in his recliner on the front porch, to watch the birds and quail feed every morning. This won't happen if the wildlife is forced to move away due to land clearing. By the way, this has already started. Isn't this premature?
2. Phase 1 of the project will affect my parent's property as it will be surrounded with new houses. They are currently surrounded by open fields and groves. They have no air conditioning and haven't required it with so many plants and trees cleaning and refreshing the air. Fresh air is abundant now but will be restricted by the building project which will cause poor air quality.
3. The General Plan Amendment (GPA 12-001), a Specific Plan (SP12-001, a Rezone (REZ 12-003), a Master Tentative Map (TM 5571 RPL 1) proposes to change the regional land use category from Semi-Rural (SR-4) to Village Residential (VR 2.9). This designation should not change for a resident that has been here since before this project was conceived. We request that the current category not change for existing residents and that it remain semi-rural. My parents are

not interested in changing the existing code of semi-rural designation or any of the existing building and fire codes that have been in effect for 50 years.

4. With regards the Water Reclamation Facility (WRF) (MUP 12-005) plans; if talking about rainwater harvesting, seems like a bad idea. The water belongs to everyone and should not be hoarded and not stolen from people and animals downstream. This has negative effects to the animals in the wild, the ranches and groves that depend on natural precipitation not to mention seasonal streams, brooks and creeks as well as private residences with fruit trees, lawns and shrubs. A much better alternative for potable water is to get an atmospheric water generator.
5. A big concern for my parents is the traffic congestion hundreds of households will create. I simply can't imagine how Lilac Road, a narrow two-lane road, can handle this massive increase in traffic. Lilac road cannot sustain the hundreds of vehicles if the project is approved. This includes Old Hwy 395. I would expect a great delay just getting onto the freeway. A traffic jam here is inevitable if existing plans are adopted. Lilac Road should be off limits to the new project and only accessible to existing residents. To reiterate, it should require a new access/exit point to Interstate 15 separate from Old Hwy 395 and Lilac Road.
6. The easement, Shirey Road, not only provides their access to the current main road (Lilac Road) it also gives us access to our utilities, electricity and water. My parents are retired and elderly. Giving up the easement will require utility moving expenses that are not included in their budget.
7. The easement is also a school bus stop. It's an easy access to and from a school bus without having a student cross a busy street.
8. Many of the proposed parks and trails in the project are for Lilac Hills Ranch owners via HOA; in other words not public parks. Of the fourteen project parks in plan, only one is open to the public.
9. The trails are unpaved and could be a risk for bike riders and pedestrians because of dust and rocks being kicked up or sliding on loose gravel. This is not ideal for those people, like my parents, who may want to learn to ride a bicycle.
10. The purpose of the project design is to get people out of their cars and walk. This may be wishful thinking. It is good to give prospective owners a choice on mode of transportation; however it should not penalize or restrict those that choose out of necessity or to live a different lifestyle. Please note that big families require a lot more groceries. That is more bags than can be carried home, if walking is required.

These are a few of the things that I noticed with regards to the impact on me and my family in the proposal for Lilac Hills Ranch. My parents have worked their entire lives for this home and to live their retirement years in quiet solace. If plan goes through, the landscape will be forever changed. What would you do if this were your parent's home?

Josie Ferrer

On Behalf of Hernandez 2003 Family Trust
32456 Shirey Road, Escondido, CA 92026

Hello Kristin and Mark,

It's been about a month since our meeting at your office. Attached is a letter of my family's concerns about the proposed project.

A copy was also sent to the County Supervisors. Please accept it in your consideration of the project.

P.S. This morning I assisted a nurse who found a hurt coyote on Hwy 395. We picked him up off the asphalt and put him in her car. We think it's a broken hip.

I can only imagine how hundreds of additional cars on this road will do to this rural community including the wildlife. Not good.

Josie Ferrer
619-542-6734

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LILAC HILLS RANCH
3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017
(STP), 3500 12-018 (STP), HLP XX-XXX, SCH 2012061100
ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)
DRAFT EIR PUBLIC REVIEW PERIOD
July 3, 2013 through August 19, 2013

DRAFT EIR COMMENT SHEET

Thursday, August 1, 2013
 COUNTY OF SAN DIEGO
 Planning & Development Services
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

WRITTEN COMMENT FORM

It has come to our attention that four specific parcels which are owned by the developers do not appear on the project. 128-290-78-00, 128-290-53-00, 128-440-02-00, 128-440-11-00. However, they appeared earlier and then mysteriously disappeared, which seems suspicious. How can the EIR be accurate if parcels come and go arbitrarily? This whole project is flawed and can't continue especially since the planners fail to notice this trend.

(Attach additional pages as needed)

Debbie Flynn - 8/19/13
 Signature Date

DEBORAH FLYNN
 Print Name

31845 Rocking Horse Rd.
 Address

Escondido CA 92026
 City State Zip Code

760-451-1279
 Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
 County of San Diego
 Planning & Development Services
 5510 Overland Avenue Suite 310
 San Diego, CA 92123
 FAX # (619) 694-3373
 e-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4 00 PM, AUGUST 19, 2013

LILAC HILLS RANCH

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017
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Thursday, August 1, 2013
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

The DEIR for this project is completely
contrary to our General Plan. This is an
agricultural area, not a cookie cutter housing
development designed to make contractors rich.
Everything about this is flawed - they leave out
entire parcels so the report is better for them.
Why can't the county planners see this?
You are supposed to work for us, not greedy developers.

(Attach additional pages as needed)

Debbie Flynn POA
Signature Date 8/1/2013
FOR PETER T FLYNN
Print Name
31845 Racking Horse Rd
Address
Escalante, CA 92026
City State Zip Code
760-451-1239
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Attn: Review
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX: (619) 694-3373
e-mail: Mark.Slovick@sdcountry.ca.gov

COMMENTS MUST BE RECEIVED BY 4 00 PM, AUGUST 19, 2013

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017
(STP), 3500 12-018 (STP), HLP XX-XXX, SCH 2012061100

ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)

DRAFT EIR PUBLIC REVIEW PERIOD

July 3, 2013 through August 19, 2013

DRAFT EIR COMMENT SHEET

Thursday, August 1, 2013
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

1. D.E.I.R is not consistent with General Plan
2. SP/GPA are inconsistent in broad and fundamental ways with SD General Plan and contrary to all VC and Bonwell community plans
3. Does not adequately address fire hazard issues, escape routes inadequate roads for this project, its impact on the agricultural community, no proper infrastructure for sewer.

(Attach additional pages as needed)

John E. Fox 8/15/2013
Signature Date

JOHN E. FOX
Print Name

8612 NELSON WAY
Address

ESCONDIDO CA 92026
City State Zip Code

760) 751-2946
Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX # (858) 694-3373
e-mail Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4 00 PM, AUGUST 19, 2013

Lilac Hills Ranch Draft EIR
Mark Slovick, Project Manager:
(858)495-5172
Mark.Slovick@sdcountry.ca.gov

Dear Mark,

The submitted Draft Environmental Impact Report (DEIR) for Lilac Hills Ranch (LHR), which falls outside of the County's recently adopted General Plan, includes glaring discrepancies, as well as legal issues with respect to roads safety and overburdening of easements.

The General Plan's (GPU) Village areas are where density concentrations are planned and approved, but LHR falls miles outside of the Valley Center North and South, and Fallbrook villages (<http://www.sdcountry.ca.gov/dpw/land/landpdf/Docs/CountywideVillage.pdf>). Accretive Investments (Applicant) was attempting to acquire, through outright purchases or lease options, the 608 acres while the GPU was in process, but never requested upzoning changes for, in essence, another Village. Since the GPU fulfills our county's future housing needs, the Applicant's request should be denied now.

If not, the County should then regard the public's safety on its public and private road network in and around the proposed project. All ten road exemptions the applicant requests are out of line with the existing conditions and many jeopardize the public's safety, which, as a stand-alone concern, should result in denial of this project.

Trash collection days on Covey Lane and Mountain Ridge Road - both with high, blind hills - summarily mean lines of residents waiting behind waste vehicles to complete the collection route, or crossing into unseen oncoming traffic to pass the trash trucks: regular trash, recyclables and green waste. Approving LHR benefit's the developer, not current residents or businesses, and legal aspects considered, not the County.

Other legal problems to examine in this Applicant's project include inconsistency within their DEIR, assumption of easements and overburdening of said easements.

One inconsistency exists between the DEIR Evacuation Plan and the Traffic Study. The applicant's evacuation plan states Mountain Ridge Road and Covey Lane will both be gated and locked at all times, with only the fire and police having keys. On the other hand, their traffic study says Mountain Ridge Road will be used only by the church and senior facility via the locked gates. If first responders are the only ones with keys to the gates, then the church and senior facility cannot have keys also. If only the church and senior facility will have access through the gates, then first responders cannot also. If you speak out both sides of your mouth, a clarity deficiency occurs with your words.

Each plan the Applicant stated for Mountain Ridge Road and Covey Lane grossly overburden the restricted easements, which are available only to a few lots in the applicant's proposed project. That is, of course, unless the County asserts eminent domain against the valid property owners, subsequently choosing the lengthy, expensive lawsuit(s) to follow. For this purportedly stand-alone development to continue without intercession from the public, County or State, easement rights for EVERY lot within the project need to be secured legally, in writing, from the rightful owners without coercion.

Additionally, the LHR requested road exemptions include drawing roads and sewer lines on properties with no or limited easements / rights. Limited easement rights for one lot do not provide rights to any

other lots. Period.

In closing, thank you for reviewing the Applicant's DEIR and our response to but a few problems with the project: its inconsistency with the GPU, discrepancies, and road and easement issues.

Respectfully,

Robert Franck
9767 Megan Terrace
Escondido, CA 92026
760-751-5349

Lilac Hills Ranch Draft EIR
 Mark Slovick, Project Manager
 (858)495-5172
Mark.Slovick@sdcounty.ca.gov

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Respectfully,

Josette Franck
9767 Megan Terrace
Escondido, CA 92026
760-509-5308



August 19, 2013

Mark Slovick
Planning & Development Services
County of San Diego
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Via email: Mark.Slovick@sdcounty.ca.gov

Re: Lilac Hills Ranch Master Planned Community EIR

Dear Mr. Slovick:

I have been involved with the Deer Springs Fire Protection District since the wildfires of 2003. I started the Deer Springs Fire Safe Council at the end of 2003 and was instrumental in obtaining voter approval for our Station 13 in Hidden Meadows and the doubling of professional staff. I still attend their meetings but only rarely due to the antagonistic attitude prevalent on the Board.

Seven years ago, a slate of citizens fighting against the Merriam Mountain project we elected to the Board. The fire district has never been the same since. There is only one word in their vocabulary and it begins with the letter "N", ends with an "O", and is exactly two letters long.

Rather than take the position of other governmental agencies who exist to serve the public, this Board only serves who they choose. Rather than review project development with an open mind and attempt to find a workable solution, their modus operandi is to blockade any development. Other districts, such as the Valley Center Water District, take the approach that they will accommodate a developer given that an operational solution is viable and will be paid for by the developer.

Because your web site does not make responses to EIRs available, I need to make some assumptions.

1. The Deer Springs Fire Protection District will file a response.
2. Their response will raise significant and unreasonable barriers.
3. The focus of their response will be response time capabilities.
4. Their response will emphasize fire hazards of the WUI.

5. Their response may also argue that the Miller Station is not owned by the District.

Major barriers put forth in the District's response are most likely included to improve their bargaining position. They need to be quickly eliminated as obstructions. The District should find ways of servicing this project instead of attempting to block it.

Arguments regarding the danger of wildfires are inappropriate at the area will be less prone to brush fires than it is now. The managed landscaping of this project substantially reduces the wildfire risk.

I understand the county-wide goal of responding to an emergency call quickly by arriving at the customer site within five minutes. While the Lilac Hills site is adjacent to the Miller Station and can service any part of the project within 5 minutes. Claims that the response time from Station 11 exceeds the five minute goal, while mostly true, ignores the existence of the Miller Station. The argument ignores the fact that it currently takes more than five minutes to reach 50% of the homes of the 47 square mile district. My own home is a mere two miles from Station 13 and they barely make it here in five minutes. Any response time argument from the District shows their hypocrisy as they are unconcerned with current service levels.

Regardless of who owns the Miller Station, denying its existence is absurd. It has been at that site for decades and the state has no plans to close it. If an emergency call comes in from Lilac Hills, the Miller Station will be automatically dispatched as they are the closest station available.

Regarding the ownership of the Miller Station, I would encourage the County to intercede with negotiations with the State to find a better solution. I am aware that the County Fire Authority funds that station for approximately six months of the year and has an opportunity to negotiate a new arrangement. One possibility would be to purchase the station for one dollar, turn it over to the District, and continue to support the District financially in the same amount that is currently being expended. Another possibility is to "merge" Miller with another Amador station in the county making one a full time CalFire station and the other a County Fire Authority station. The cost tradeoffs would be equalized.

Sincerely,



Thomas J Francl

Dear Mark Slovick,

I'm writing to you about my present concerns of the environmental impact report concerning the Lilac Hills Ranch project. In my opinion, this master planned community needs to be scaled way down in density of people for that amount of unincorporated county space.

25 years ago, whenever we as a family got too tense or stressed where we lived in Vista, we would take a drive out to the country for a little while. West Lilac was the road we always took off of the freeway, to get away from it all for a while. Have you ever heard the saying, "A day in the country is worth ten in the city"? It is a sign you can buy to put up in your house or yard. We found this to be so, that many years ago. We would pack a picnic lunch, & stop at an out of the way park, or along a wide place in the road to picnic, while listening to the birds, the quietness of nature and the breeze. I'll never forget the first bobcat we saw. It was a very hot day, and there he was, just 30 feet from us, sprawled out on a low lying tree branch of a live oak. He was amazing! After a day in the country, marveling at the different smells and scents, types of birds we could see and hear, we always came back refreshed and ready to go again. Little did we know way back then that we would have the opportunity to one day buy a home out here, in our family haven area we have gone to many times through the years.

We've been here about ten years, and have a large household of 7 voting age members and two grandchildren. On the weekends, we watch families slowly driving by, motorcycle clubs, bike clubs etc. Everyone loves to come out here on their way up to Valley Center for the day because it is just so peaceful and serene. That is because of all of the orchards and flower fields that are still here. Some growth out here has happened, and more will happen, but up until this point, it has been responsible growth that fits with the vibe of the entire area. The road runners are still here, bobcats, coons, weasels, and the swallows still come every spring along with so many other kinds of birds. The honey bees have a field day out here. The crop dusters are also still spraying the fields and orchards, quite often. We need this Lilac Hills Ranch project to have responsible, wise growth, not what they are currently proposing. This present maximum capacity growth that is planned, belongs as urban sprawl closer to the city of Escondido. Not only are their coiffed grass nature areas negligent compared to the cement jungle of streets and buildings, but it is a travesty and defacement of nature's bounty that is provided for everyone to come and enjoy out here.

Just a few years ago, SDG&E was proposing shutting down all electrical out here when there was a fire, because of the high fire hazard area that it is. Their comment was, "Anyone who lives out there, is save enough to run generators, and survive on their own. That's why they live out there." When I think of unsuspecting city people who didn't grow up on a farm as I did moving out here, I think of their helplessness in the face of the types of problems that can occur out here. We are a half hour away from supermarkets, banks, doctors, etc. It will be a commute for them when they are used to popping out to the fast food or grocery store. There is no public transportation, no meals on wheels, no senior citizens nutritional centers or quick response times when a sheriff is called upon. We encounter rattlesnakes from late spring, through the fall until cold weather hits and has been here for a while. We also have scorpions, etc. quite regularly. There is no AT&T out here, just satellite TV and internet, or even slower, dial up internet. In other words, this is not only village cluster unfriendly for numerous reasons, it is a raping and robbing of our countryside. When I see all of the land Accreative has purchased and shut off well water to the groves to make them all die, it breaks my heart. I see out countryside losing the hawk families, the owls who keep rodent populations down, the bobcats and coyotes who also keep rodent and small wild animal populations down disappearing to go back even further into the countryside. I see the swallows not having places to go the following spring, because their natural places have been replaced by too many cement buildings and population. I see gang violence and drug problems coming with this great amount of populace in one small area, with still

slow response times to trouble. These amounts of people would have no clue of how to live out here. They are not fire or country savvy. That puts us all in much danger. This project needs to have only 1 home per 2 or 4 acres, not the cement jungle that is presently planned. It has no business out here, and certainly doesn't fit with this area. We do not want the 1,746 residences and the amount of people per households that brings. We are against SR-4 village residential and VR2 village core, nor do we want our road, West Lilac to change from 2.2c to 2.2F, or level of service an E or F. We do not want this vast amount of habitat loss of coastal sage scrub, the loss of wildlife, and our rural aesthetics destroyed. Traffic will be a problem every morning and evening, let alone during a fire evacuation of which we have had 3 in the 10 yrs. We have lived here. We all live here to escape the city noises, and do not want the noise pollution brought here, in the middle of nowhere.

Responsible and wise planned growth would be for homes to comply with present rural zones. We are all for rural people, moving into this present rural community. If we wanted villages and core residential s, there are already plenty to move into, closer to the city of Escondido.

We all know that Accreative has paid the big money to fund political campaign mailings, political receptions, etc. PLEASE, PLEASE don't sell out to this project in it's present form, which is an affront to the majority of people who live out here. Accreative needs to be good neighbors to all of us out here already. We need their project to match the rest of the countryside already here, not something that will stick out like a sore thumb while destroying it all for the rest of us. Please don't favor them with this project as it currently is, just because they have spent so much money on ya'll. If they insist to keep it this large, then they need to move their project in closer to the city of Escondido, where it would fit in nicely according to their density. There is enough land yet undeveloped, so we don't need this large number of new residents living on top of each other way out here. I grieve over the loss and environment this will cause in it's present form. I ask you to please reconsider.

Thank You,
Roger and Janet Friend
9461 W. Lilac Rd.

Slovick, Mark

From: patsyfritz@aol.com
Sent: Monday, August 19, 2013 3:54 PM
To: Slovic, Mark
Cc: Aghassi, Sarah; Wardlaw, Mark; Gretler, Darren M; Real, Sami; "Claudia Anzures"@sdcounty.ca.gov
Subject: Lilac Hills Ranch Specific Plan DEIR

To: Mark Slovic <Mark.Slovick@sdcounty.ca.gov>

CC:
Sarah Aghassi <Sarah.Aghassi@sdcounty.ca.gov>,
Mark Wardlaw <mark.wardlaw@sdcounty.ca.gov>,
Darren Gretler <Darren.Gretler@sdcounty.ca.gov>,
Sami Real <Sami.Real@sdcounty.ca.gov>,
Claudia Anzures <Claudia.Anzures@sdcounty.ca.gov>

Re:
DEIR for Lilac Hills Ranch Specific Plan
PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM), PDS2 012-3300-12-005 (MUP), PDS2012-3500-12-017 (STP), PDS 2012-3500-12-018 (STP), HLP XX-XXX LOG NO. 3910 12-02-003 (ER); SCH NO.2012061100
Lilac Hills Ranch Master Planned Community

Dear Mark:

The purpose of the EIR is to provide the necessary information to the decision-making body, the San Diego County Board of Supervisors.

1. This DEIR is incomplete and ineffective as it reviews the tiniest portion of the proposed development - less than 20% of the living units proposed and 0% of the commercial development.
2. The proposed development is wildly out of conformance with the newly-adopted County General Plan, AND, in fact, is based on the developer's proposal, "Just AMEND the General Plan to OUR financial interests and THEN we will be IN CONFORMANCE to the General Plan."
3. The DEIR focuses inward without any concern for the larger community of Valley Center, the existing neighborhood, and the inter-related and balanced elements of the County's land use policies embodied in the updated General Plan - in particular, traffic.
4. This is a LeapFrog development dependent entirely on private vehicle use. There is no retail or job-available aspect provided for the fewer than 400 homes/1,000 residents in the only "phase" that is proposed and may be the only one developed. EVERYONE will have to DRIVE elsewhere.
5. This project is not compliant with LEED Neighborhood development policies. It is at this time 608 acres and not "under 320 acres" as required. Further, recent litigation by an Accretive consultant revealed that Accretive is actively seeking vastly more acreage contiguous to their current owned/optioned property. Growth is caused by this project and it will inevitably enlarge because it DOES NOT HAVE THE ECONOMY OF SCALE to support the NEEDED INFRASTRUCTURE to serve its urban development.

6. This project relies on "truck and dump" to remove human waste. Timeline for any other option? Unstated and unknown.

7. There is NO ECONOMIC STUDY presented that costs out the "per unit" share of the required infrastructure, which could reach \$100,000 to \$400,000 per unit in bonded indebtedness -- but the land value cannot support this burden under the 1913-1915 Streets & Highways Code parameters.

8. This project offers laughable "secondary" access for fire/emergency evacuation by simply a narrow, crescent shape sub-road that would direct all vehicles to the narrow 2-lane bridge over 1-15. This project will be "the cork in the bottle" that would prevent a major portion of EXISTING Valley Center residents being able to escape a local disaster because 5,000 people from the Accretive development (at "buildout") and their 3,500 vehicles have blocked the West Lilac "escapeway."

9. This project is relying on unauthorized use and over-burdening of PRIVATE roads (Mountain Ridge and Covey Lane) to evacuate residents and businesses. It needs PUBLIC County Roads to do so. The developer should BUY land that will provide connectivity to Old Highway 395 and to Circle R. Instead the developer is asking for TEN variances of County Road standards because they do not want to pay for road improvements/upgrades commensurate with County road requirements and the General Plan. If the County were to approve this project and its usurpation of the rights of private road owners, what's next? Welcoming Somali pirates to prey on ships in San Diego Bay?

10. This project destroys farmland and endangers neighboring agricultural operations. The value of farmland in San Diego County is not based on soil type (all soils can be amended,) but by CLIMATE. The West Lilac Triangle and contiguous areas rely on long sunny days, moderate winter chill that can drain from the mesas to the valleys and offset the possibility of freeze, available water, and relative humidity that will not desiccate field-grown ornamentals - the high-value crops in this County. Just the night illumination alone from 300+ homes (and ultimately 1,800, plus commercial) will destroy night-time pollination by moths, drawn to the concentration of Accretive's patio and street lights - and fried. We already face a crisis of loss of pollination by bee colony collapse disorder (BCCD) and now this developer wants to put an urban center into a rural agricultural area that will destroy the only other pollinator, moths, which are significantly important to floral agriculture.

11. Why is there no study to determine the number of days/years; hours per day; and airborne pollutant from deadly silica shards resulting from blasting the rocky granite ridges that cross these 608 acres? Local granite is 70% silica and when continuously blasted - or moved - will cause irreparable lung damage to existing residents. Silicosis results in a long, painful death - with the agony hastened only by death from heart failure.

12. There is an inherent conflict of interest where the LOBBYIST for Accretive serves on the body that JUDGES the performance of DPDS Staff.

Please require that the above issues be addressed, Mark.

Respectfully submitted,

Patsy Fritz
33265 Mil Creek Road
Pauma Valley, CA 92061

Slovick, Mark

From: patsyfritz@aol.com
Sent: Monday, August 19, 2013 4:35 PM
To: Slovick, Mark
Cc: Sarah.Agassi@sdcounty.ca.gov; Wardlaw, Mark; Gretler, Darren M; Real, Sami; "Claudia Anzures"@sdcountyca.gov
Subject: My earlier response re the Lilac Hills Ranch DEIR

Dear Mark,

Regarding my second point, below:

2. The proposed development is wildly out of conformance with the newly-adopted County General Plan, AND, in fact, is based on the developer's proposal, "Just AMEND the General Plan to OUR financial interests and THEN we will be IN CONFORMANCE to the General Plan."

Mark, please note that the portion in parentheses, "Just AMEND the General Plan to OUR financial interests and THEN we will be IN CONFORMANCE to the General Plan." is my paraphrasing of what the applicant's strategy appears to be. This is not a quote from Accretive and is not intended to be Accretive's words.

On the other hand, of course, if the Board of Supervisors re-writes the General Plan the way a developer wants. to favor his development, then a developer's proposal does get to conform to the GP.

BUT, THEN WHO PAYS FOR THE newly-adjusted GP's necessary EIR? The taxpayers????

But after 14 years' exertion and \$18.2 million in taxpayer expense, I don't expect the carefully-crafted GP to be junked by the BOS - for Accretive or anyone.

In any case, as this goes forward "in process" I want to be certain that my quote in section 2., above, is recognized as my paraphrasing, and is NOT a quote from Accretive.

Please attach this to my original e-mail for staff's review of the responses to the DEIR. My earlier submittal is below.

With great thanks,

Patsy Fritz
33265 Mill Creek Road
Pauma Valley, CA 92061

-----Original Message-----

From: patsyfritz <patsyfritz@aol.com>
To: Mark.Slovick <Mark.Slovick@sdcounty.ca.gov>
Cc: Sarah.Aghassi <Sarah.Aghassi@sdcounty.ca.gov>; Mark.Wardlaw <Mark.Wardlaw@sdcounty.ca.gov>; Darren.Gretler <Darren.Gretler@sdcounty.ca.gov>; Sami.Real <Sami.Real@sdcounty.ca.gov>; Claudia Anzures <Claudia.Anzures@sdcounty.ca.gov>

Sent: Mon, Aug 19, 2013 3:53 pm
Subject: Lilac Hills Ranch Specific Plan DEIR

To: Mark Slovick <Mark.Slovick@sdcounty.ca.gov>

CC:
Sarah Aghassi <Sarah.Aghassi@sdcounty.ca.gov>, Mark Wardlaw <mark.wardlaw@sdcounty.ca.gov>, Darren Gretler <Darren.Gretler@sdcounty.ca.gov>, Sami Real <Sami.Real@sdcounty.ca.gov>, Claudia Anzures <Claudia.Anzures@sdcounty.ca.gov>

Re:

DEIR for Lilac Hills Ranch Specific Plan

PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM), PDS2 012-3300-12-005 (MUP), PDS2012-3500-12-017 (STP), PDS 2012-3500-12-018 (STP), HLP XX-XXX LOG NO. 3910 12-02-003 (ER); SCH NO.2012061100 Lilac Hills Ranch Master Planned Community

Dear Mark:

The purpose of the EIR is to provide the necessary information to the decision-making body, the San Diego County Board of Supervisors.

1. This DEIR is incomplete and ineffective as it reviews the tiniest portion of the proposed development - less than 20% of the living units proposed and 0% of the commercial development.
2. The proposed development is wildly out of conformance with the newly-adopted County General Plan, AND, in fact, is based on the developer's proposal, "Just AMEND the General Plan to OUR financial interests and THEN we will be IN CONFORMANCE to the General Plan."
3. The DEIR focuses inward without any concern for the larger community of Valley Center, the existing neighborhood, and the inter-related and balanced elements of the County's land use policies embodied in the updated General Plan - in particular, traffic.
4. This is a LeapFrog development dependent entirely on private vehicle use. There is no retail or job-available aspect provided for the fewer than 400 homes/1,000 residents in the only "phase" that is proposed and may be the only one developed. EVERYONE will have to DRIVE elsewhere.
5. This project is not compliant with LEED Neighborhood development policies. It is at this time 608 acres and not "under 320 acres" as required. Further, recent litigation by an Accretive consultant revealed that Accretive is actively seeking vastly more acreage contiguous to their current owned/optioned property. Growth is caused by this project and it will inevitably enlarge because it DOES NOT HAVE THE ECONOMY OF SCALE to support the NEEDED INFRASTRUCTURE to serve its urban development.
6. This project relies on "truck and dump" to remove human waste. Timeline for any other option? Unstated and unknown.
7. There is NO ECONOMIC STUDY presented that costs out the "per unit" share of the required infrastructure, which could reach \$100,000 to \$400,000 per unit in bonded indebtedness -- but the land value cannot support this burden under the 1913-1915 Streets & Highways Code parameters.
8. This project offers laughable "secondary" access for fire/emergency evacuation by simply a narrow, crescent shape sub-road that would direct all vehicles to the narrow 2-lane bridge over 1-15. This project will be "the cork in the bottle" that would prevent a major portion of EXISTING Valley Center residents being able to escape a local disaster because 5,000 people from the Accretive development (at "buildout") and their 3,500 vehicles have blocked the West Lilac "escapeway."
9. This project is relying on unauthorized use and over-burdening of PRIVATE roads (Mountain Ridge and Covey Lane) to evacuate residents and businesses. It needs PUBLIC County Roads to do so. The developer should BUY land that will provide connectivity to Old Highway 395 and to Circle R. Instead the developer is asking for TEN variances of County Road standards because they do not want to pay for road improvements/upgrades commensurate with County road requirements and the General Plan. If the County were to approve this project and its usurpation of the rights of private road owners, what's next?
Welcoming Somali pirates to prey on ships in San Diego Bay?
10. This project destroys farmland and endangers neighboring agricultural operations. The value of farmland in San Diego County is not based on soil type (all soils can be amended,) but by CLIMATE. The West Lilac Triangle and contiguous areas rely on long sunny days, moderate winter chill that can drain from the mesas to the valleys and offset the possibility of freeze, available water, and relative humidity that will not desiccate field-grown ornamentals - the high-value crops in this County. Just the night illumination alone from 300+ homes (and ultimately 1,800, plus commercial) will destroy night-time pollination by moths, drawn to the concentration of Accretive's patio and street lights - and fried. We already face a crisis of loss of pollination by bee colony collapse disorder (BCCD) and now this developer wants to put an urban

center into a rural agricultural area that will destroy the only other pollinator, moths, which are significantly important to floral agriculture.

11. Why is there no study to determine the number of days/years; hours per day; and airborne pollutant from deadly silica shards resulting from blasting the rocky granite ridges that cross these 608 acres?

Local granite is 70% silica and when continuously blasted - or moved - will cause irreparable lung damage to existing residents. Silicosis results in a long, painful death - with the agony hastened only by death from heart failure.

12. There is an inherent conflict of interest where the LOBBYIST for Accretive serves on the body that JUDGES the performance of DPDS Staff.

Please require that the above issues be addressed, Mark.

Respectfully submitted,

Patsy Fritz
33265 Mil Creek Road
Pauma Valley, CA 92061

Larry Glavinic,
Valley Center Community Planning Group
PO Box 2088
Valley Center, CA 92082

August 16, 2013

Mark Slovick, Project Mgr
County of San Diego Planning & Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123

Mark.Slovick @ sdcounty.ca.gov

Subject: **DEIR** Public Comment to the Proposed **Accretive Lilac Hills Ranch (LRH)** General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 Mobility Element and DEIR Chapter 2. **(Significant Mobility & Public Safety Deficiencies)**

MINORITY REPORT- VALLEY CENTER COMMUNITY PLANNING GROUP

Dear Mr. Slovick,

Let me be succinct, the mobility element aspect of the LHR exasperates an already fragile road system for Valley Center (VC). Claiming that both with and without **Road 3** the proposed project would be acceptable is absurd. This is patently untrue knowing the currently proposed LHR project will negatively impact VC's sustainability and mobility. Good planning whether for a General Plan or a Specific Plan must be based on balancing the following land use, public safety, mobility, environmental, conservation, noise, and water/air quality). For example, over-compensating for air quality doesn't mitigate for mobility deficiencies. The mobility deficiencies can be easily observed both up and downstream from the proposed LHR project. The LHR project is a perfect example of selectively applying some planning principles. In particular, I question the traffic study done by Chen - Ryan Associates knowing any simulation model, can be manipulated to minimize negative impacts. Repeated traffic studies done by SANDAG even as late as June 2008 & September 2010 have shown significant negative impacts to mobility at build-out which affect public safety throughout VC. I have copies of these map if it would help verify the seriousness of the impacts. In sum, you can't put 10 pounds in a 5 pound bag. Even the Chen-Ryan associates study illustrates road capacity issues. Namely, at build-out the capacity of two 2 lane road segments are exceeded one at Maxwell bridge at I-15 and the other at Cole Grade Road have 18,900 ADTs and 20,080 ADTs respectively. Above 16,200 ADTs is **Level of Service (LOS) F**, i.e., GRID-LOCK or a serious choke point. Remember, NO alternative routes exist or are planned to handle these serious choke points.

Please address these **significant** mobility deficiencies in the EIR.

Sincerely



Larry Glavinic, VC Community Planning Group, member 760-749-6350 ofc

Exhibit A- attached includes figures and Tables from Chen-Ryan traffic study.
Table 9.3 & Figure, 9-3 with Road 3 and Table 9.7 & Figure 9-4 without Road 3

Even the Chen Ryan Associates Traffic study illustrates the negative impacts to Cole Grade Road with or without Road 3. However, their study omitted a key road segment on Cole Grade Road, namely north of Fruitvale Road to Miller Road. It omits addressing impacts caused by transitioning from a 4 lane road to a 2 lane road on Cole Grade. Table 2.3.18 and Table 2.3.19 show ADTs at build-out of 20,080 ADTs, and on table 2.3.21 and Table 2.3.20 of 17,990 ADTs respectively. Studies done by SANDAG July 26, 2008 with Road 3 show the ADTs on this road segment north of Fruitvale at 16,900 ADTs. This would exceed the capacity of a 2 lane road which is 16,200 ADTs at LOS E. No new alternative routes exist to handle these ADTs. **Cole Grade Road would then be LOS F, i.e., or GRIDLOCK.** This is unacceptable to Valley Center. Further, were Road 3 in place the number of ADTs on Cole Grade would be reduced. Currently, a major portion of the traffic on Cole Grade merely makes a U-TURN at the high school since there is no connectivity to western Valley Center. With Road 3 more traffic would go west creating more ADTs passing through the Lilac Hill Ranch (LHR) project. Thus, illustrating the undersized roads in the vicinity of the LHR project and the **LOS F at Maxwell bridge 18,900 ADTs.**

9-2010

County of San Diego
GP Update EIR

2030 PLANNING
COMMISSION RECOMMENDED
LOS and Volume Plct
VALLEY CENTER Area

2030 Forecasted Volume*
Based on the 2030 AD
Urban Road 24

Levels of Service:
A-C
D
E
F

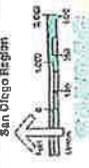
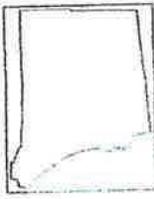
Non-Circulation Element
Zone Connector
Traffic Analysis Zone

Forecasted Volume
*
Adjusted Volume
Unadjusted Volume

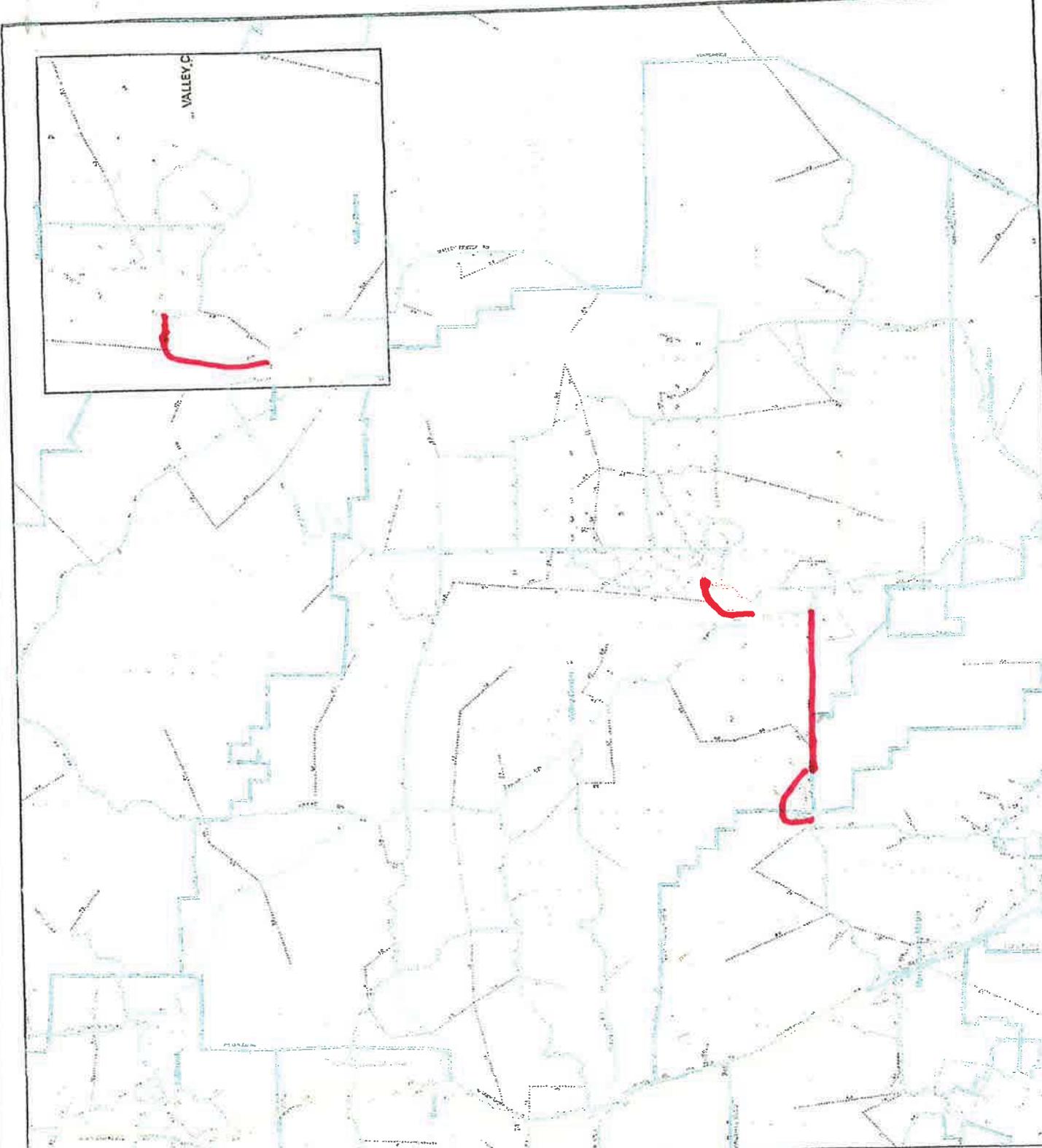
Level of Service Calculations
Peak Hour Boundary Line
New County Daily ADT (2030 Scenario) to non-24hr

ADT	1000	1500	2000	2500	3000	3500	4000	4500	5000	5500	6000	6500	7000	7500	8000	8500	9000	9500	10000
LOS	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
ADT	1000	1500	2000	2500	3000	3500	4000	4500	5000	5500	6000	6500	7000	7500	8000	8500	9000	9500	10000
LOS	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A

This map is based on the information of the County of San Diego and was prepared as best as possible. The County does not warrant the accuracy of the information. These data are for reference purposes only. The County does not accept liability for any errors or omissions. © 2010 County of San Diego.



San Diego Region
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Feet
© 2010 County of San Diego
All Rights Reserved. No Warranty Is Made.
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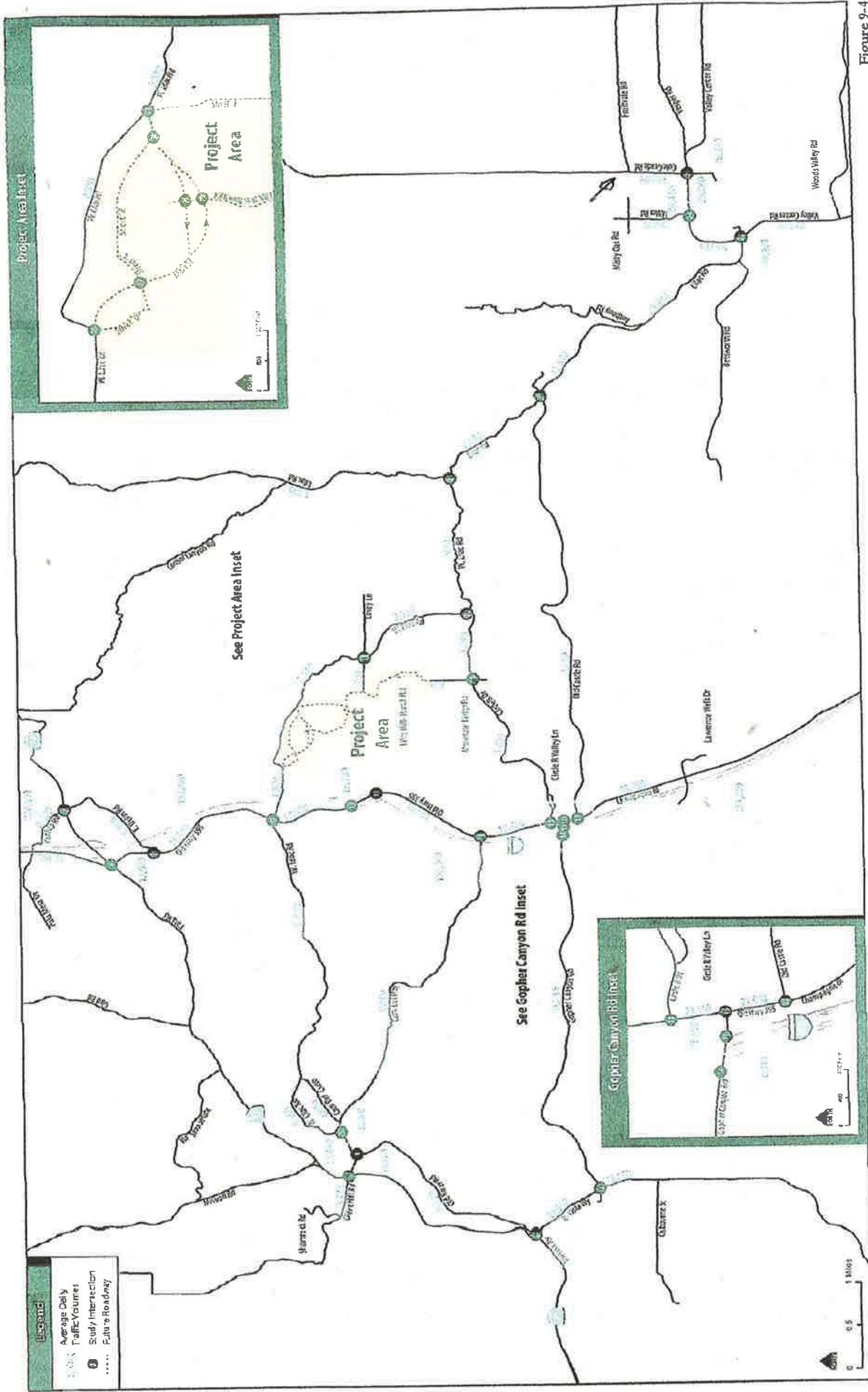


Figure 9-4
 Roadway Average Daily Traffic Volumes -
 Horizon Year Base Conditions without Road 3

Lilac Hills Ranch Traffic Impact Study
 CHEN RYAN

**TABLE 9.7
ROADWAY SEGMENT LEVEL OF SERVICE RESULTS
HORIZON YEAR BASE CONDITIONS
(without Road 3)**

Roadway	From	To	Classification	LOS Threshold (LOS D)	Average Daily Traffic (ADT)	Level of Service (LOS)
Lilac Road	New Road 19 (east of Betsworth Road)	Valley Center Road	4.2B	25,000	40,280	F accepted at LOS E/F
Valley Center Road	Woods Valley Road	Lilac Road	4.2A	27,000	23,160	C
Valley Center Road	Lilac Road	Miller Road	4.1A	33,400	34,720	E
Valley Center Road	Miller Road	Indian Creek Road	4.2A	27,000	35,340	F accepted at LOS E/F
Valley Center Road	Indian Creek Road	Cole Grade Road	4.2A	27,000	25,690	D
Valley Center Road	Cole Grade Road	Vesper Road	4.2A	27,000	16,370	A
Miller Road	Misty Oak Road	Valley Center Road	2.3B	8,000	2,490	A
Cole Grade Road	Fruitvale Road	Valley Center Road	4.2A	27,000	20,080	B

Source: Chen Ryan Associates; June 2013

Note:
Bold letter indicates unacceptable LOS E or F.



As shown in Table 9.7, the following four (4) study area roadway segments are projected to operate at substandard LOS E/F under Horizon Year Base conditions without Road 3:

- Old Highway 395, between SR-76 and E. Dulin Road – LOS E, and the County General Plan Update has accepted LOS E/F operations along this segment;
- Lilac Road, between New Road 19 (east of Betsworth Road) and Valley Center Road – LOS F, and the County General Plan Update has accepted LOS E/F operations along this segment;
- Valley Center Road, between Lilac Road and Miller Road – LOS E; and
- Valley Center Road, between Miller Road and Indian Creek Road – LOS F, and the County General Plan Update has accepted LOS E/F operations along this segment.

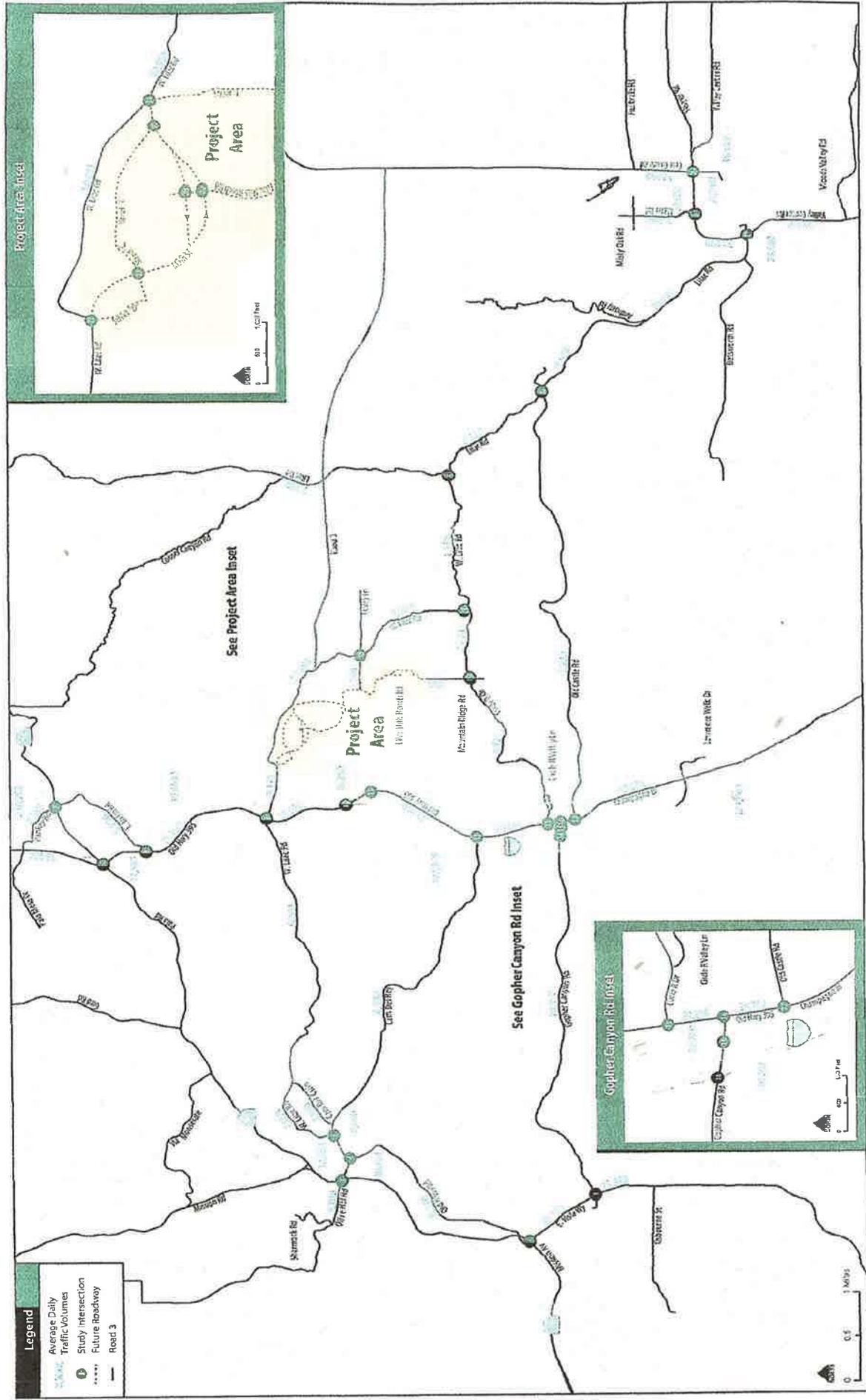


Figure 9-2
 Roadway Average Daily Traffic Volumes -
 Horizon Year Base Conditions with Road 3

**TABLE 9.1
ROADWAY SEGMENT LEVEL OF SERVICE RESULTS
HORIZON YEAR BASE CONDITIONS
(with Road 3)**

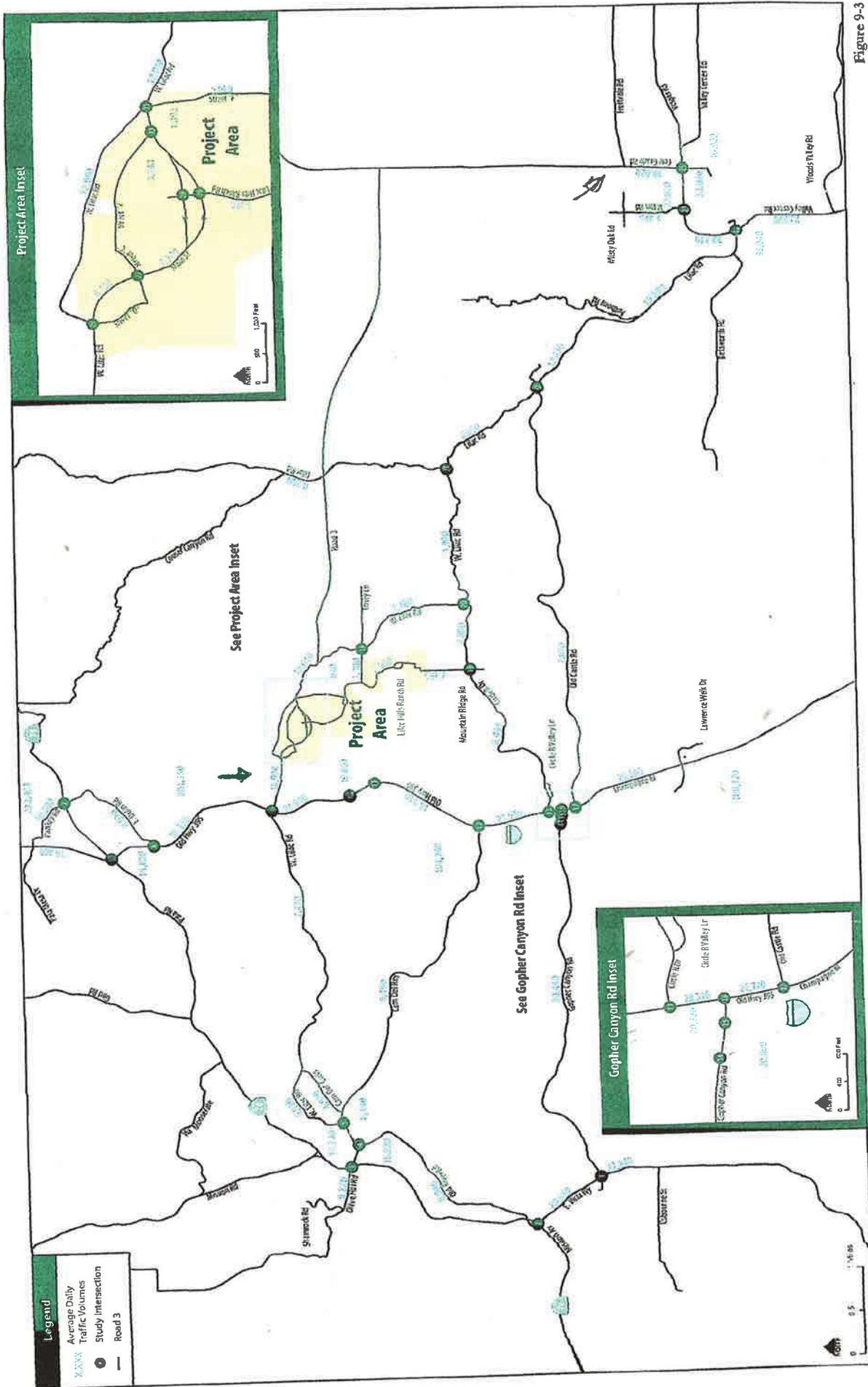
Roadway	From	To	Classification	LOS Threshold (LOS D)	Average Daily Traffic (ADT)	Level of Service (LOS)
Old Highway 395	I-15 NB Ramps	Camino Del Rey	4.1B	30,800	13,960	B
Old Highway 395	Camino Del Rey	Circle R Drive	4.1B	30,800	20,540	B
Old Highway 395	Circle R Drive	Gopher Canyon Road	4.1B	30,800	27,290	C
Old Highway 395	Gopher Canyon Road	Old Castle Road	4.1B	30,800	24,740	C
Champagne Boulevard	Old Castle Road	Lawrence Welk Drive	4.1B	30,800	19,360	B
Pankey Road	Pala Mesa Drive	SR-76	2.1A	15,000	9,360	C
Lilac Road	Couser Canyon Road	W. Lilac Road	2.2E	10,900	7,750	D
Lilac Road	W. Lilac Road	Old Castle Road	2.2E	10,900	8,130	D
Lilac Road	Old Castle Road	Anthony Road	2.1C	13,500	11,850	D
Lilac Road	Anthony Road	New Road 19 (east of Betsworth Road)	4.2B	25,000	19,140	B
Lilac Road	New Road 19 (east of Betsworth Road)	Valley Center Road	4.2B	25,000	33,880	F accepted at LOS E/F
Valley Center Road	Woods Valley Road	Lilac Road	4.2A	27,000	23,200	C
Valley Center Road	Lilac Road	Miller Road	4.1A	33,400	32,090	D
Valley Center Road	Miller Road	Indian Creek Road	4.2A	27,000	32,990	F accepted at LOS E/F
Valley Center Road	Indian Creek Road	Cole Grade Road	4.2A	27,000	23,790	C
Valley Center Road	Cole Grade Road	Vesper Road	4.2A	27,000	16,900	A
Miller Road	Misty Oak Road	Valley Center Road	2.3B	8,000	2,400	A
Cole Grade Road	Fruitvale Road	Valley Center Road	4.2A	27,000	17,990	A

Source: Chen Ryan Associates; June 2013

Note:
Bold letter indicates unacceptable LOS E or F.



5200 Fox
Page 201



Lilac Hills Ranch Traffic Impact Study

Figure 9-3

Roadway Average Daily Traffic Volumes - Horizon Year Base Plus Project Conditions with Road 3

CHEN RYAN

**TABLE 9.3
ROADWAY SEGMENT LEVEL OF SERVICE RESULTS
HORIZON YEAR BASE PLUS PROJECT CONDITIONS
(with Road 3)**

Roadway	From	To	Horizon Year with Project				Horizon Year w/o Project			Project ADT	Project Impact?
			Classification	LOS Threshold (LOS D)	ADT	LOS	ADT	LOS	ADT		
Valley Center Road	Miller Road	Indian Creek Road	4.2A	27,000	33,020	F accepted at LOS E/F	32,990	F accepted at LOS E/F	30	No < 200ADT	
Valley Center Road	Indian Creek Road	Cole Grade Road	4.2A	27,000	23,820	C	23,790	C	30	No	
Valley Center Road	Cole Grade Road	Vesper Road	4.2A	27,000	16,900	A	16,900	A	0	No	
Miller Road	Misty Oak Road	Valley Center Road	2.3B	8,000	2,420	A	2,400	A	20	No	
Cole Grade Road	Fruitvale Road	Valley Center Road	4.2A	27,000	18,020	B	17,990	A	30	No	

Source: Chen Ryan Associates, June 2013

Notes:
Bold letter indicates unacceptable LOS E or F.
***Proposed downgrade from 2.2C to 2.2F.**

Project Planner, Mark Slovick
San Diego County Department of Planning and Development Services
5510 Overland Ave, Suite 310
San Diego, CA 92123

August 2, 2013

Dear Mr. Slovick,

I am writing to you about the Lilac Hills project.

If the Lilac Hills project is accepted, the general plan, which cost taxpayers many millions will be null and void.

The general plan specifically lists areas which are already urbanized, or to clarify, where infrastructure is in place. These areas do not allow development in natural habitat, or sparsely developed agricultural or residential land.

The Lilac Hills project is 10 miles north of SANDAG's "Smart Growth" boundary.

It is hilly, criss-crossed with creeks

It is separated from 1-15 corridor by steep hills

In the fall of 2012, the County's planning department staff issued a 364 page letter, citing some 1000 "issues" with the proposed Lilac Hills Project) issues meaning conflicts with the General Plan.)

This project is a slap in the face to the Valley Center Community Planning Group. This elected body spent years carefully developing a plan for residential development that would allow growth around the already developed area on Valley Center Road. This project ignores that entirely.

If this project is approved, it will set a precedent that will allow many more developments- making the General Plan NULL and VOID!



Laura Glusha
6 Larry Lane
Escondido, CA 92025
760.480.0844

Dear Mr Slovick

Comments on proposed Lilac Hills Ranch DEIR

Traffic: West Lilac is heavily traveled during certain times of the day. To add trips from over 1700 additional homes is unthinkable.

The developer says the development is going to contain much of its traffic as it has retail, recreation and job opportunities for the residents within itself. Well, it won't supply everything needed nor everyone with employment.

Most of the jobs will be low wages not enough to afford a resident to be able to buy one of the homes within the development.

The increased traffic on I-15 which is a parking lot on Friday evenings as people try to get from work in San Diego areas to points north like Temecula, Menifee and Riverside. The reverse is true at earlier hours of the day as those same people attempt to go south.

The development will add traffic - to think otherwise is foolish.

Add to this the large development of college extension, apartments, homes, big stores that have been approved for the intersection of I-15 and HWY 76 intersection.

Also, planned for Hwy 76 are a 2,000 unit at Meadowood, 800 units at Warner Ranch and 40 units at Shadow Run Ranch. I-15 will fail!

This whole plan is full of suppositions and maybes - for instance, the **water supply**. They cite different **possible** sources such as ground water, rain water, gray water, reclaimed water from a proposed waste water treatment plant. But none of these are hard figures. Notice how many possible, could, potential, sources are cited - nothing in hard facts.

Pollution during construction - 8-12 years of building based on sales of homes. That means years of dust and dirt from the sites.

4 million cubic yards of dirt to be cut, filled, moved.

Proximity to Bonsall and Valley Center commercial sites Bonsall Village commercial has many empty stores and more seem to close every time I visit. Valley Center is growing and more commercial sites are happening. It does not take 25 minutes to drive from West Lilac to Valley Center commercial areas. How about 15 minutes?

But these are not where people moving into Lilac Hills Ranch will shop - they will stop off on their way home from work and pick up what they need or go to the new site at I-15 & 76 for groceries where a major supermarket is planned.

Thank you for the chance to present my voice.

Florence Griffis, 9542 Covey Lane, Escondido, CA 92026

lacking adequate infrastructure for safe biking and walking. This becomes a safety issue. 8. Accretive Investments have been disingenuous, When I question the safety of having only a two lane (West Lilac) bridge for traffic and evacuations due to fires. I was told by Chris Brown at several public meetings: 'They were going to widen the bridge, paid for by them and Cal Trans.' EIR does not reflect this construction.

-----Original Message-----

From: darlenehare <darlenehare@aol.com>
To: markslovick <markslovick@sdcounty.ca.gov>
Sent: Mon, Aug 19, 2013 8:40 am
Subject: Lilac Hills Ranch

Dear Mr. Slovick:

We live near the proposed Lilac Hills Ranch. We moved here over 20 years ago because we wanted to live in a rural community with at least 2.5 acre lots.

We want to go on record that we oppose the Lilac Hills Ranch project for many reasons, especially since the Developer is trying to amend the General Plan to place a "city" in our rural community. The density of this proposed project is overwhelming, producing traffic problems, noise pollution and light pollution, destroying our rural way of life.

Projects such as this belong where an infrastructure already exists, not disjointed in the middle of a designated agricultural community.

There should be no amendment to the existing General Plan which we taxpayers already funded.

The Developer is expecting the taxpayers to pick up the expenses for much of this project.

Thank you for your serious consideration.

Sincerely,
Ben & Darlene Hare
9902 West Lilac Road
Escondido, CA 92026

(760) 749-6253

July 20, 2013

Mark Slovick
Planning and Development Services-San Diego County
5510 Overland Ave. Suite 110
San Diego, California 92123

Some concerns I have about Accretive Development Co. Lilac Hills Ranch project EIR include

1. It is not a feasible walking community as claimed.
 - A. The school is at the back edge of the community with most of the homes over half mile away making it too far to walk.
 - B. The senior citizens club house is at the edge of their community on top of a 50 foot hill making it almost impossible to walk to.
 - C. The church is behind the gated senior area making it almost impossible to access.
2. It is not a very safe community.
 - A. The gates in the senior community are open every Sunday for anyone to enter because of the church.
 - B. The school athletic fields back up to acres of gullies filled with rattle snakes. One snake bite on a child could be fatal.
 - C. The main road leading to the school from the ranch does not have a bike lane. The only alternative is using the dirt/mud path.
 - D. Covey Lane, the main road to the school for most of Valley Center, does not have sidewalks.
 - E. The dog park is surrounded by gullies with hungry coyotes.
 - F. The school shares its very small parking lot with a public park making school security impossible.
 - G. The school ball field is down a 50 foot cliff making supervision impossible.
3. Not enough parking.
 - A. Only 40 parking spots for the school, the county park, and the athletic fields. Just one event at any of the venues would fill up the parking lot.
 - B. The senior citizens center has just 34 parking spots. Situated on top of a 50 foot hill most everyone would need to drive their cars. A catering staff would take half of the parking spots for any social event at the center.
 - C. The 50 room country inn has only 34 parking spaces.
 - D. The recreation center/fitness and next door restaurant share only 43 parking spaces. The staff alone would use half of the lot.
 - E. Fifteen feet deep driveways an undersized two car garages makes it impossible to park full size cars or trucks leaving only the street for parking.
 - F. Vehicles parking on short driveways blocking sidewalks, ultra narrow building lots, large cars parked on the streets in front of every house, postage stamp area for front yard landscaping –what a mess!

4. Poor trail design.
 - A. Some of the trails are only 3 feet wide. Many are only two feet wide. Bicycle riders would kill the hikers or each other in head on collisions.
 - B. No direct trail from the senior area to the village. Also the seniors have no safe way of driving golf carts to the village.
5. Poor street design.
 - A. The main North-South road through the development is not a collector type road but a residential street with many houses facing it. With hundreds of cars traveling each day trying to back safely out of a driveway would be very dangerous.
 - B. Most all traffic in the community will need to drive through the congested 'town square'. Cars backing out of the diagonal parking will be very dangerous and stop traffic flow. Cars doubling parking waiting for someone to back out will also stop traffic flow. The steady stream of pedestrians crossing at the non-signalized streets corners will also stop traffic.
 - C. The limited street frontage in front of the school would need to be reserved for bus parking making very little room for individual student drop offs.
 - D. Cars will not be able to leave the school because of the backed up grid lock at the two nearby roundabouts by cars waiting in line on Covey Lane and Lilac Ranch Road trying to enter the school zone.
6. Citrus and avocado groves
 - A. Citrus and avocado trees do not grow well in public maintained areas. These production trees require specialized care that the homeowner association 'mow and blow specialists' cannot or will not provide.
 - B. Planting citrus and avocado trees in the new cut slopes also is a very poor idea. Page 46 of the EIR Agricultural report (paid for by Accretive) reports that this will not work due to the poor soils.
7. Covey Lane
 - A. Changes to Covey Lane are discussed in several parts of the EIR but with contradicting or missing information.
 - B. Part of Covey Lane is going to be made public. Who gives Accretive the exclusive right to make decisions of private land and roadway owned by others?
 - C. Part of Covey Lane will become private belonging to the Lilac Hills Homeowners. How will this affect the property owners who have easements on Covey Lane.
 - D. The design of intersection of Covey Lane and Lilac Ranch Road is missing.
 - E. No sidewalks to walk on.
8. Two Separate Projects or One
 - A. The EIR maps show that this is not one project but two. These two areas are over 500 feet apart at the closest point. A small piece of land connects the two halves.
 - B. Why is this connecting land not included in the project? Why is there just one project being processed instead of two?

Bill Henry

Mark Slovick
Planning and Development Services-San Diego County
5510 Overland Ave. Suite 110
San Diego, California 92123
Subject: Lilac Hills Ranch Environmental Impact Report

7/20/13

The EIR explored various alternatives to the proposed Lilac Hills Ranch project. Another alternative would be a conservation development where far fewer homes are built and the undeveloped land is designated open land or farm conservation easement. This type of development might meet the approval of the nearby neighbors, the Valley Center/Bonsal community, and the county.

Conservation developments are widely used in Colorado. In a large study by Colorado State University researchers compared home prices in open space conservation developments to home prices in tightly packed neighborhoods. They found that if the land is up to 70% open space the fewer homes that were built would sell at an average 29% premium. The extracted sales price of each buildable lot for the developer would increase 100 to over 200 percent.

The study found that the typical buyers were 'outdoorsy' type who would love to live in the country or on a farm but do not have the resources to own a large parcel, but would pay the premium price for a home in the conservation land or ranch community. All over the state conservation developments are being built. Communities embrace this concept and actively participate in the development process.

One idea for the Lilac Hills Ranch would be to have one village town center instead of three. This village would include a mix of housing styles. The village would include stores, restaurants, a town square, work/live units, offices, and a lake. A resort hotel could overlook the lake. The high end village architectural design would embrace not only the ranch residents but the neighboring community. The majority of the ranch outside of the village would be open space including small farms, ranches, flower fields, corrals, vineyards, and biological open space. Lilac Ranch Road would bisect the ranch. This road would include a landscaped medium, hiking trails, bike path, a fenced horse trail, water features, pocket garden parks, and fitness parks. Radiating off this street, into the farms areas, would be small private roads each leading to building nodes. Each node would have five semi-custom homes radiating from a cull de sac. Each home would have 'over the fence' views of the vineyards, groves, and ranches. Twenty of these pods could be built in the farm area resulting in an additional 100 homes. A horse boarding and training academy would be built at the end of Covey Lane near the water retention area. Several horse trails would cross the ranch. A 'first class' recreation center would be in the middle of the ranch. It would include tennis courts, swimming pools, gym, recreation rooms, food service, outdoor patio, and a banquet room. Also on Lilac Ranch Road would be an architecturally significant designed church and school. The 'killer/signature' feature of the ranch would be a replica of a historic barn. The barn would be a meeting hall used by civic groups, community clubs, and weekend farmers market. Inside the barn would be pictures of the ranching past of the community. Outside the barn would be a simulated barn yard, gardens, an 'old time' playground and a picnic area. On display would be historical farm equipment.

The entire ranch, including the village, the inn by the lake, the church with a school, first class recreation center, the historic barn meeting hall, the two mile long country road bisecting ranches, farms, open space, and the hiking and horse trails would make this the number one address in San Diego County. The ranch would give a new meaning to 'country club living'. Conservation developments are working in Colorado. They are a win-win for the developer and the community. The Lilac Hills Ranch project proposal needs a lot of refinements before it can be approved. This idea that might make their project less objectionable to the community.

Bill Henry

LILAC HILLS RANCH

3800 12-001 (GPA), 3810 12-001 (SP), 3100 5571 (TM),
3100 5572 (TM), 3600 12-003 (REZ), 3300 12-005 (MUP), 3500 12-017
(STP), 3500 12-018 (STP), HLP XX-XXX, SCH 2012061100

ENVIRONMENTAL LOG NO.: 3910 12-02-003 (ER)

DRAFT EIR PUBLIC REVIEW PERIOD

July 3, 2013 through August 19, 2013

DRAFT EIR COMMENT SHEET

Thursday, August 1, 2013
COUNTY OF SAN DIEGO
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

WRITTEN COMMENT FORM

Property is zoned for 2-4 acre lots!
let them build homes w/ that
qualification & infrastructure to
match

(Attach additional pages as needed)

Leslie Humphrey 8-16-13
Signature Date

Leslie Humphrey
Print Name

1541 Glasgow Lane
Address

Escondido CA 92087
City State Zip Code

Phone Number

MAIL, FAX or E-MAIL FORMS TO:

Mark Slovick
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
FAX: (619) 594-3373
E-mail: Mark.Slovick@sdcounty.ca.gov

COMMENTS MUST BE RECEIVED BY 4:00 PM, AUGUST 19, 2013

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

Growth Inducing Impacts

1.8.1 Growth Inducement Due to General Plan Amendment (Increases in Density)

Apparently, the folks who wrote this section of the DEIR have not lived in southern California for long and/or are unaware of the history of development here. The DEIR makes the statement that “it is a location where such growth is likely to occur because the project area can accommodate the growth.” Such tortured circular logic makes any reasonable explanation for the conclusion unattainable. Growth can occur anywhere we choose to place it. We, as a community make such determinations about the location and types of growth based on land use planning, zoning and community consensus. That is how we arrived at the General Plan [it took 12 years and \$18.4 million to do it]. To abandon the General Plan simply because growth can occur at a given place begs the question why have a General Plan at all? The California legislature reasonably concluded that each county must have a general plan to guide growth, hopefully logically, but at least, in an ordered way. Prospective property owners are able to go to the General Plan to determine what kind of development is likely to occur around the property they wish to buy. That kind of research is useless if the General Plan can be drastically changed before the ink is dry on its first printing.

The proposed addition of 1746 equivalent dwelling units [EDU] could take place virtually anywhere in the County using the fast and loose logic presented in this DEIR. Of course, maybe that is the plan: approve a general plan, any general plan, and then simply change it when it is convenient to do so. It’s much less messy than debating the best course for the County’s land use plan, arriving at some consensus and then defending the plan in the face of development requests that have no intention of addressing, much less complying with, the General Plan. Why is the County failing to defend the goals and policies of the General Plan when confronted with projects such as this one? Where in the General Plan does it offer a pass for projects that, like this one, fail to comply with so many of the goals and policies of the plan?

By approving this project, the County will be opening the surrounding 2-, 4-, 10+-acre parcels to more intense densities based on the justification that the project is at village densities, and the up-zoning of surrounding property would be consistent with the higher village densities of the project. Sounds circular to me. And, it is. The County Community Development Model requires higher densities at a village core with gradually decreasing densities as one moves to the periphery of the village. Of course, this project is not consistent with the Community Development Model itself. Dropping such a large, urban development into rural agricultural land where most of the infrastructure to sustain it will have to be built for the project subverts the intent of the Model.

The DEIR continues, “Approval of the Property Specific Requests could result in an increase of approximately 1598 dwelling units throughout the regional area. Therefore, the project’s proposed density would not induce the growth in this portion of the county.” First, basing a

justification for not inducing growth on the prospect of an approval of the Property Specific Requests is fanciful. What if it is not approved? Will the project induce growth then? Second, there is no definition of what the “regional area” is, nor any analysis of how the possible addition of 1598 EDU would relieve the area surrounding this project from growth inducement. Are we to just take the County’s word for it? Are not the Property Specific Requests merely an assault on the General Plan by the Board of Supervisors at the request of individual property owners trying to squeeze even more potential density out of properties designated for other uses by the consensus-built General Plan?

1.8.2 Growth Inducement Due to Construction of Additional Housing (Population and Housing)

Housing Trends

The DEIR’s discussion of housing trends seems to me to be irrelevant to the discussion of growth inducement. The General Plan Update [the presently approved General Plan] has already projected a ‘fair share’ of growth for both the Bonsall and Valley Center communities. Both of these communities will grow, according to the General Plan, at dramatically higher rates than the rest of the County between now and 2050. However, the project under consideration here is not a part of that projection and, therefore, is not needed, nor wanted, by either community in order to meet the 2050 General Plan build out. Why hasn’t this project been relocated to the village core of either Bonsall or Valley Center or, even better, the Escondido downtown SPA? The village cores are planned for such growth. This project flouts those plans and the logic of the Community Development Model.

Housing trends are something that the development industry views in order to build houses that will sell more easily. Land use planning isn’t the same thing. Rather than rearranging land use designations and upending the General Plan, the applicant should have overlain their project on land with appropriate existing land use designations.

Housing Needs

The DEIR presentation of housing needs, like its depiction of housing trends, is a superfluous analysis. The preparers of the DEIR should be focusing on the General Plan. The twelve-year long development of the General Plan has already analyzed population growth, housing needs, and the land use component. That is what planning does, it projects the needs of the community into the future so growth can be accommodated with as little disruption and calamity as possible. Based on the serious analyses that the General Plan is built on, the proposed project is an unnecessary carbuncle on the Community Development Model-consistent communities of Valley Center and Bonsall.

The DEIR reports, “The other uses proposed by the project, including the neighborhood-serving commercial, school site, WRF, RF, park, trails, and other project associated infrastructure improvements, would be developed to service only the proposed residences and existing population, and are not anticipated to draw additional population to the area.” Separate analyses of these other uses conclude that they are misplaced and unneeded except and unless the proposed project is approved. Again, this is circular logic that sidesteps the goals and policies of the carefully considered General Plan. Of course the project would have to have commercial uses and would have to build infrastructure for the high densities they propose. Their cynical plan to define this project as consistent with the Community Development Model wouldn’t even have the patina of consistency without those elements. But even with them, the project doesn’t begin to measure up to the Model. I

suspect that if one were to ask any manager of a commercial establishment, such as those suggested for the proposed project, if they wished to limit their commercial reach to only the project residents and the scant few existing residents surrounding the project they would say 'No.' As with any merchant, limiting sales is not part of the business model, typically. These merchants are rather among those that agitate for growth in order to extract a higher level of sales. That is growth inducing.

1.8.5.4 Water and Wastewater

The DEIR concludes that the addition of wastewater facilities for the project would not induce additional surrounding growth because of the infeasibility of adding additional hookups for surrounding properties to the project's 'unique design flow' and purpose-sized facilities. Of course, this analysis did not include the proposed redesign and expansion of the Lower Moosa Water Treatment Facility to accommodate this project [an expansion that would likely accommodate growth beyond this project]. That water treatment facility was originally designed and sized to accommodate a couple of earlier developments, and, I suspect if an EIR was done in 1974 when it was built, it probably concluded that it would not be growth inducing. The fact is, like any supporting infrastructure, if there is a desire to expand it to accommodate additional growth, there is an engineering solution to make it happen. Saying the wastewater facilities would limit growth potential is disingenuous and ludicrous.

1.8.6 Conclusion

The DEIR sees this project as an island of self-sustaining residential and commercial uses that is removed from the necessity of engaging the world outside its boundaries. This arm's length existence will keep the surrounding properties, which are largely agricultural, from experiencing the pressure to rezone to match the proposed project village densities. Of course, this is a fantasy that would make Disney envious. The fact is, there is very little that makes this project self-sustaining in terms of jobs, consumer commercial opportunities, or infrastructure. Once in place, this project and its population will require greater commercial options, more infrastructure, better and more roads than are being planned, and more services.

The agricultural land uses surrounding the project will not be able to operate as efficiently with the scores of sensitive receptors presented by the project limiting processes and procedures that are essential for efficient and cost competitive operation. The inefficiencies resulting from the sensitive receptors and inadequate agricultural buffers for the project will incline the farmers to calculate the potential profit to be gained by changing the land use designation and densities for their properties and to sell out. That is growth inducement.

The DEIR conclusion #5 states, "The project would not result in growth inducement due to provision of public facilities. The availability of a new school site would assist the district in meeting the student enrollment demands created by the project. The proposed parks are designed to comply with state and County requirements and to serve the proposed population generated by the project. This is laughable.

The Valley Center Pauma Unified School District will gain the majority of new students from

this project. It presently has a vacant school and a declining enrollment. No state funds for buying a new school location and building a new school will be available until the vacant school reaches capacity. The offer of the school site on the project has not been adequately defined enough to allow for alternative funding options. Further, the school site offer is uncertain in terms of the length of time the offer remains in effect, and it allows that if one or the other of two districts doesn't accept the offer, the applicant will withdraw the offer and make the acreage available for other unspecified purposes. It doesn't take a genius to understand that the school site offer is of little value to the school district at this point. However, despite the unused school capacity within the school district, the applicant is proposing a new school in order to induce growth at the farthest boundary of the district. How is this not growth inducement? If this project were being proposed at the Valley Center North or South Village, the unused school would likely handle the surge of enrollment from the project without adding a new school. Why isn't the county encouraging the applicant to relocate its project to one of the village cores where school capacity already exists? Would not building an unneeded school on the project site induce surrounding growth that could take advantage of a new school while leaving unused capacity in the village core?

The community understanding of adding new parks as a condition of development is that the new parks will benefit the entire community and any growth anticipated in the Valley Center Community Plan and SD County General Plan. To say that new parks would merely satisfy the state and county requirements for the proposed population of the project misses the point of requiring parks development with new development. A community with new parks and trails is more attractive to prospective homebuyers and therefore growth inducing.

The Lower Moosa Canyon WRF has been shown to lack the capacity to accommodate the project effluent without expansion and upgrading. These expansions and upgrades are growth inducing themselves, in that they will allow this project to be built. Once upgraded and expanded for this project, further additions of EDU will be more possible and thus, growth inducement continues. Could you explain again how this scenario is not growth inducing?

My conclusion is that, besides being unnecessary growth that is outside the needs expressed in the General and Community Plans through the year 2050, this project will, indeed, be growth inducing. If approved, this project will be cited by future projects proposed for its borders and environs as justification for extension of urban densities in the rural areas of Valley Center and Bonsall. In fact, this project's Specific Plan cited the presence of several other clustered developments north and south of its location along the I-15 corridor as a legitimate, consistent basis for approving the Lilac Hills Ranch project. Yes, this is how growth inducement works.