

August 15, 2013

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**Subject:** 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), DEIR Chapter 2 Analysis of **Cumulative Impacts** of the proposed Lilac Hills Ranch (LHR) Project

Dear Mr. Slovick:

By way of brief summary: A) the County has asserted that all Environmental Impact areas assessed in Chapter 3 of the proposed LHR Project DEIR are either less than significant or can be mitigated to less than significant. We disagree with the County's unsupported conclusions, and submit that five of the seven areas involve **Significant Environmental Impacts**: B) Several of the impacts addressed in Chapter 2, Findings of Significant Environmental Impact, are not properly analyzed in terms of avoidance and mitigation options and requirements; and C) As a result of the deficiencies in Chapters 2 and 3, the so-called cumulative impacts analysis in each of the respective impact sections is inadequate and functionally meaningless.

#### **A. Chapter 3 - Findings of Less than Significant Environmental Impacts**

3.1.2 Greenhouse Gases (GHG) – Evidence presented disagrees strongly with the finding of Less than Significant reached in the DEIR analysis of GHG impacts.

As the Cleveland National Forest Foundation has elaborated in great detail in the GHG Public Comments authored by Shute, Mihaly, & Wineberger on August 19, 2013, the LHR Project GHG analysis is deficient and inadequate; the County must find **Significant Impacts** in the area of GHG.

As a consequence of a finding of Significance, a Cumulative Impact assessment **must** be performed and **was not** performed.

3.1.3 Hydrology and Water Quality – Evidence presented disagrees strongly with the conclusions on the finding of Less than Significant reached in the DEIR analysis of Hydrology and Water Quality impacts.

As demonstrated with evidence in the July 31, 2013 “Water Quality and Related Impacts” Public Comments letter, the proposed LHR Project has several Significant Environmental Impact issues with Hydrology and Water Quality. As the facts

demonstrate, the County must find **Significant Impacts** in the area of Hydrology and Water Quality.

As a consequence of a finding of Significance, a Cumulative Impact assessment **must** be performed and **was not** performed.

3.1.4 Land Use Planning – Evidence presented disagrees strongly with the conclusion of finding less than Significant Impacts reached in the DEIR analysis of Land Use Planning.

As demonstrated with evidence in the August 13, 2013 “General Plan Consistency” Public Comments letter, the proposed LHR Project has a multitude of Significant Environmental Impact issues with Land Use Planning. As the evidence in the letter demonstrates, the County must find **Significant Impacts** in the area of Land Use Planning.

As a consequence of a finding of Significance, a Cumulative Impact assessment **must** be performed and **was not** performed.

3.1.5 Public Services - Evidence presented disagrees strongly with the conclusion of finding less than Significant reached in the DEIR analysis of Utilities and Service Systems.

As demonstrated with evidence in the August 11, 2013 “Fire Protection Plan, Evacuation Study, and DEIR Chapter 2.7 Hazard” Public Comments letter, the proposed LHR Project has multiple Significant Environmental Impact issues with Fire Protection and Evacuation. As the facts demonstrate, the County must find **Significant Impacts** in the area of Public Services.

As a consequence of a finding of Significance, a Cumulative Impact assessment **must** be performed and **was not** performed.

3.1.7 Utilities and Service Systems – Evidence presented disagrees strongly with the conclusion of finding less than Significant reached in the DEIR analysis of Utilities and Service Systems.

As demonstrated with evidence in the July 31, 2013 “Water Quality and Related Impacts” Public Comments letter, the proposed LHR Project has several Significant Environmental Impact issues with Waste Water Treatment. As the facts demonstrate, the County must find **Significant Impacts** in the area of Utilities and Service Systems.

As a consequence of a finding of Significance, a Cumulative Impact assessment **must** be performed and **was not** performed.

In summary, of the seven areas assessed by the County in DEIR Chapter 3 as having Less than Significant Environmental Impacts, **five areas** have evidence that require

## finding of **Significant Impacts** AND GENERATION OF CUMULATIVE IMPACT ASSESSMENT ANALYSES.

Given the overwhelming body of evidence that supports these findings of Environmental Significance, and the County's failure to address the Impacts in a Cumulative Impacts analysis, it is requested that the County revise its DEIR to reflect the evidence and recirculate it for Public Comment.

### **B. Chapter 2 - Findings of Significant Environmental Impacts**

The analyses of Cumulative Impacts as presented in Chapter 2.0 "Significant Environmental Effects" are discussed for each area examined in Chapter 2.

2.1.3 Visual Resources Cumulative Impacts – We concur with the County's assessment that "Cumulative visual impacts would remain significant and unavoidable," especially in light of the very minimal mitigation the LHR Project proposes. Planting a few trees doesn't blot out the scars from 4 million cubic yards of grading that drastically and irreversibly alters the scene scape.

2.2.3 Air Quality Cumulative Impacts – We concur with the County's assessment that there are severe cumulative Environmental Impacts and the proposed mitigation will not reduce adverse Environmental Impacts from this proposed Urban Sprawl Commuter community located far from services and employment.

We agree that "the project would result in a cumulatively considerable net increase in emissions, representing a **cumulatively significant impact. (Impact AQ-5).**" The mitigation offered whereby the Applicant offers to observe County regulations when conducting Blasting Operations is acceptable. However, to conclude that "implementation of M-AQ-5 would reduce direct and cumulative significant construction related impacts to less than significant" is an unsubstantiated assertion. The Construction process has many component parts. In addition to Blasting all need to be discussed before evidence is provided that the mitigation is effective. Merely watering down the Blast site before detonation is inadequate to mitigate all Construction impacts to less than Significant.

We agree that: "In combination with the emissions of pollutants from other proposed projects or reasonably foreseeable future projects, impacts would be **cumulatively significant (AQ-6).**" The pedantic mitigation whereby the Applicant offers to generously develop a Green Cleaning Product education program has the functional utility of rearranging deck chairs on a sinking ship. The Significant Environmental Impact remains after this ineffective attempt at mitigation.

2.3.3 Traffic Impacts Cumulative Impacts – The evidence presented in the Darnell and Associates Independent Expert Review of Traffic submitted as Public Comments on August 16, 2013 presents evidence of **Significant Cumulative Impacts** that have not been mitigated.

2.4.3 Agricultural Resources Cumulative Impacts – The assertion that all Cumulative Agricultural Impacts can be reasonably mitigated to less than Significant has no evidence that supports it. On the contrary, the Cleveland National Forest Foundation Public Comments authored by Shute, Mihaly, & Wineberger on August 19, 2013 present factual evidence that the Agricultural Cumulative Impacts remain **Significant**. A summary of the Agricultural evidence provided is in the next three paragraphs.

For many of the same reasons that the DEIR's analysis of Project-specific impacts is deficient, its analysis of cumulative impacts is also insufficient. For example, the DEIR again relies on the LARA model's faulty analysis to conclude that, because the Project allegedly will not impact an important agricultural resource, it cannot possibly contribute to a significant cumulative impact. DEIR at 2.4-21. This is absurd for all of the reasons detailed above, and for the additional reason that the Project will directly impact more than 40 acres of Prime Farmland or Farmland of Statewide Importance; thus, even impacts on only this type of farmland contribute to a significant cumulative impact.

The DEIR's analysis is also internally inconsistent. After first determining that the Project will not contribute to a cumulative impact, the DEIR then analyzes cumulative impacts anyway, and determines that "significant cumulative indirect impacts could occur." DEIR at 2.4-22. Such inconsistent reasoning and analysis thwarts CEQA's fundamental purpose to inform the public and decision makers and is in itself a CEQA violation.

Regardless, the DEIR's analysis is faulty for substantive reasons as well. First, the DEIR attempts to show that the Project's conversion of hundreds of acres of productive farmland is insignificant by comparing it to the loss of farmland statewide, as opposed to regional, or community-wide losses. DEIR at 2.4-22. It thus bases its finding of insignificant cumulative impacts on this County-wide analysis, even though it admits that the Project represents 58% of the potential impacts to Important Farmland within the cumulative study area. *Id.* The DEIR may not artificially minimize the Project's apparent impacts by ignoring the document's selected cumulative impact study area and "watering down" the Project's impact by comparing them to a vastly larger area. As the DEIR recognizes, the County requires agencies to analyze cumulative impacts by looking at impacts caused by other projects in the cumulative study area. DEIR at 2.4-21; see also Guidelines § 15130(b)(3) (agencies must define a relevant cumulative study area in which they analyze cumulative impacts). Here, the cumulative study area consists of a few thousand acres surrounding the Project site, not the entire County. DEIR at 2.4-22. Within this study area, the Project will unquestionably make a cumulatively considerable contribution to a significant cumulative impact on agricultural resources. The DEIR's conclusion to the contrary is not supported by substantial evidence.

2.5.3 Biological Resources Cumulative Impacts – The County assesses the Cumulative Environmental Impact in the five categories below as "potentially significant, contribute

to cumulative loss, add to the cumulative loss, and generally contribute to the cumulative loss.”

**2.5.3.1 Special Status Species; 2.5.3.2 Riparian Habitat or Sensitive Natural Communities; 2.5.3.3 Jurisdictional Waters and Waterways; 2.5.3.4 Wildlife Movement and Nursery Sites; 2.5.3.5 Local Policies, Ordinances, Adopted Plans**

Yet despite these descriptors that are not recognized CEQA analytical categories, somehow the cumulative impact is deemed by the Applicant to be less than Significant, despite the equivocal statements above.

How is this possible? The Applicant states without support that because the Project complies with applicable County, State and Federal policies that Significant Impacts are magically reduced to less than Significant.

The Applicant does not specifically provide evidence that the proposed LHR Project in fact complies with applicable County, State, and Federal policies that protect Biological Resources – the Applicant merely makes the unsupported assertion that the Project complies.

Is the statement “these plans and regulations are designed such that significant cumulative County impacts would be less than significant” sufficient evidence that the LHR Project does not have Significant Environmental Impacts?

Short answer – No! **Significant and Irreversible Impacts** to Biological Resources are incurred by the proposed LHR Project

2.6.3 Cultural Resources Cumulative Impacts – In this section, the County states:

*“Therefore, because the proposed project and those projects within the cumulative impact study area are mitigated through the placement of cultural resources within open space, data recovery, curation, temporary fencing, and recordation, the proposed project would not cumulatively contribute to a significant impact.”*

And then states two paragraphs later:

*“**Impact CR-1:** Site CA-SDI-20436 does not meet the threshold of significance under RPO but it is a significant resource under CEQA. Because the site is not within the dedicated open space easement, there is the potential for significant direct and indirect impacts.”*

So – the impacts are Significant, but they’re less than Significant because ..... of what? A statement has been made in the DEIR at 2.6.3 that mitigation has been provided by locating all Cultural Resource sites in Open Space. And yet two paragraphs later, the DEIR identifies Site CA-SDI-20436 **outside** proposed LHR Project Open Space.

Due to lack of supported evidence of Impact CR-1 mitigation, the Environmental Impacts remain **Significant**.

2.7.3 Hazards and Hazardous Materials Cumulative Impacts – The County’s analysis of Wildland Fires and Evacuation totally misses the architectural transportation flaw of this ill-conceived Community:

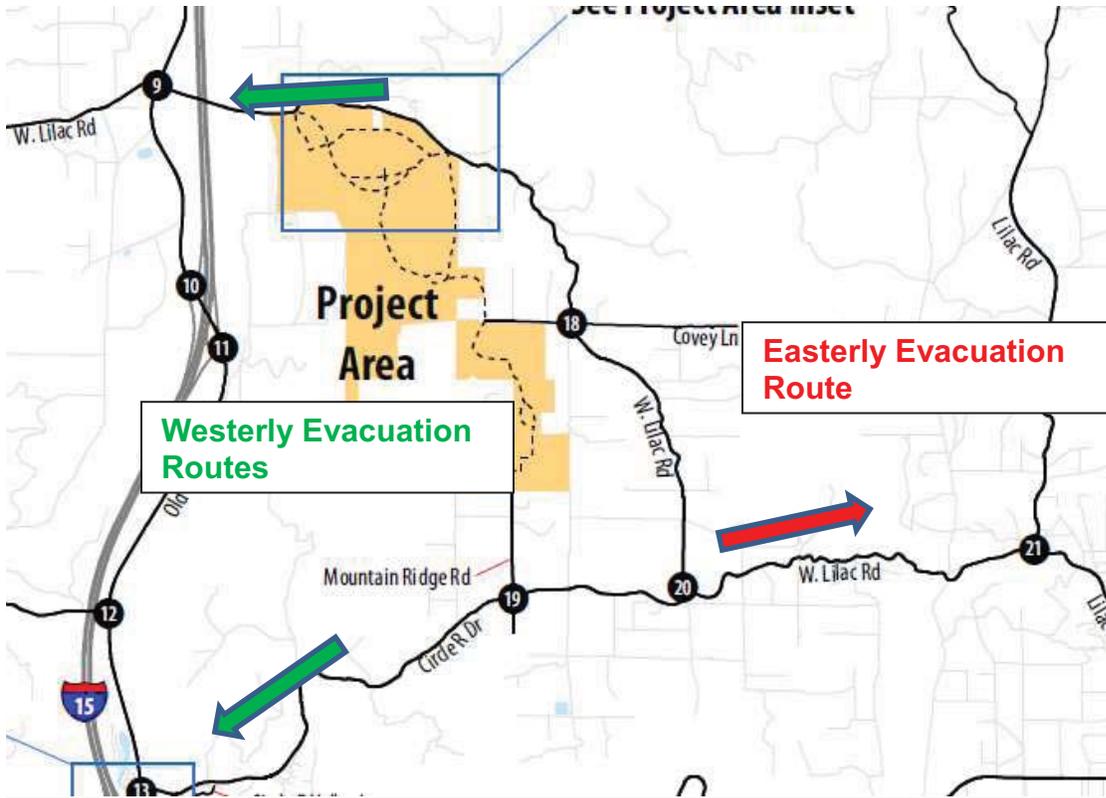
The Evacuation Plan does not address the most fundamental evacuation issue of the Proposed LHR Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed LHR Project when added to the cumulative impact of existing population that would be evacuating with trucks and trailers with livestock creates an unacceptable Safety Hazard.

The LHR Project has but two Public Roads that provide evacuation routes to the West: West Lilac Road to the north and Circle R Road to the South. Both are two lane rural Circulation Element 2.2 E roads for which **Accretive plans no upgrade**. Accretive is requesting exception to future County upgrade plans for portions of West Lilac Road to be **downgraded** from 2.2 C to 2.2 F capacity.

The LHR Project has but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. The current “as built” configuration of this road does not meet current 2.2 E road design standards for certain design features, such as paved shoulder width, sight distance, design speed, curve radii, etc. In addition to the 5185 human in the LHR Project, this single evacuation route will also be used by the existing population for evacuation, leading to extreme Safety risks to human life.

Please refer to Figure 1 below that illustrates the proposed LHR Project Evacuation Routes:

**Figure 1 – Westerly and Easterly Evacuation Routes**



Wildland Fires and Evacuation is a LHR Project **Significant** Environmental that the County has not mitigated.

2.7.3 Noise Cumulative Impacts – The County identifies the following four Significant Noise Cumulative Impacts:

**“2.8.4.4 Cumulative Impacts**

**Impact N-17:** Traffic generated noise at off-site receivers adjacent to Covey Land and future Lilac Hills Ranch Road would increase significantly over existing conditions and would result in a significant cumulative impact.

**Impact N-18:** The project would place NSLUs in areas where the projected cumulative noise levels from road traffic could exceed the County’s exterior noise limits. This is a significant cumulative impact.

**Impact N-19:** Construction noise would result in noise events construction activity, including grading. If multiple construction operations occurred simultaneously, a significant cumulative impact would result.

**Impact N-20:** Construction noise would result in impulsive noise events from blasting. If multiple blasting operations occurred simultaneously, a significant cumulative impact would result.”

The County further discusses these Cumulative Impacts and potential mitigations:

“The project could result in a cumulatively considerable noise impacts associated with cumulative traffic (Impact N-17 and N-18), construction operations (Impact N-19) and blasting activities (Impact N-20). Implementation of mitigation measures M-N-1, 2, 11, and 12 would reduce cumulatively considerable noise impacts associated with construction and blasting to less than significant by assuring that multiple construction operations would not occur simultaneously with the project.

However, impacts associated with traffic increase would remain significant and unmitigated.”

By the County’s own admission, Cumulative Traffic Noise exceeds County standards and no mitigation is provided. Therefore, it remains a **Significant** unmitigated Environmental Impact.

### **C. The DEIR’s Analysis of Cumulative Impacts is Deficient**

As a result of the above cited deficiencies, the cumulative impacts analysis in each impact section is inadequate and meaningless. By way of example, in the Agricultural Resources analysis, the DEIR inappropriately relies on the LARA model and concludes that, because the Project allegedly will not impact an important agricultural resource, it cannot possibly contribute to a significant cumulative impact. Once the DEIR accurately reflects and characterizes the significant impacts in the Agriculture area, there must be a related avoidance, mitigation and cumulative impacts analysis. The same need for a new and meaningful cumulative impacts analysis in the other impact sections will arise as soon as there are proper and supportable conclusions regarding actual impacts and avoidance and mitigation measures..

In conclusion, the DEIR needs to be rewritten to recognize a multitude of significant environmental impacts and to carefully address related avoidance and mitigation measures. These additions will then be the basis for meaningful cumulative impacts analysis. Once rewritten the DEIR should be noticed and circulated for public review and comment.

Sincerely,

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August 11, 2013

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**Subject:** 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), Fire Protection Plan, Evacuation Study, and DEIR Chapter 2.7 Hazards

Dear Mr. Slovick –

Fire Protection Plan (FPP)

The proposed Lilac Hills Ranch (LHR) Project FPP does not meet the following basic requirements identified below by Issue Number:

1. Of the three Fire Station site Options proposed by the Applicant, none meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Charter of the DSFPD focuses on providing no greater than 5 minute emergency response time to the ENTIRE DSFPD, of which the proposed LHR Project is a subset.
2. The Applicant states in the FPP that the LHR Project fully complies with the DSFPD Ordinance No. 2010-01, County of San Diego Consolidated Fire Code, and County of San Diego Public and Private Road Standards. **The LHR has factual compliance issues with all of these regulations.**
3. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address Structure Fires, Emergency Medical Service (EMS), or perform any Fire Safety Zone Analysis whatsoever.
4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.
5. Fuel Modification Zones (FMZ) – The applicant appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100 foot FMZ requirement.

Each of the five Issues above is substantiated as follows.

Issue 1 – Acceptable siting Options for a Fire Station servicing the LHR Project - The following information has been synthesized from the 6/12/13 (Attachment A), 3/5/2013 (Attachment B), and 8/10/2013 (Attachment C) DSFPD Letters. In addition, Valley Center Community Planning Group (VCCPG) members had a 2 hour meeting with Chief Amestoy as well as telephone conversations with respect to Environmental Impacts of the proposed LHR Project. VCCPG members also interacted with the Deer Springs Fire Board during their August 7, 2013 public Board meeting. Information from these interchanges are reflected below.

- The DSFPD Charter is to provide Fire and EMS services for the entire District, including the potential LHR Project.
- DSFPD owns three fire stations (Station 11- 8709 Circle R Drive, Escondido; Station 12 - at

1321 Deer Springs Road, San Marcos; and Station 13 - at 10308 Meadow Glen Way East, Escondido.

**-No existing DSFPD Station has the ability to meet the 5 minute Emergency Response Time requirement for Fire Services to the proposed LHR Project.**

-The Miller Fire Station (Station 15) is NOT OWNED BY DSFPD. IT IS OWNED BY CAL FIRE (STATE OF CALIFORNIA). Station 15 is seasonal, is equipped with a Brush engine that is not suited for Urban Structures fires, and does not have EMS equipment or staff.

-The District has a policy of a uniform tax rate across all County assessed real property in the District.

-The 2013 DSFPD Annual Operating Cost (Recurring cost not including Capital expenditures for land, facilities, and equipment) for an operating Fire Station is \$ 1.2 Million.

- The estimated Annual revenue increase to DSFPD from the LHR Project at full build out in 2013 dollars is \$ 0.8 Million. LHR tax base only provides 2/3 of the Annual Operating Cost to fund a Fire Station.

- DSFPD (not CAL FIRE or any other Fire Authority) must provide 5 minute or less Emergency Response Time for Fire and EMS service to all customers in the DSFPD, including the proposed LHR Project. **The only feasible method for DSFPD to accomplish this is by operating a total of 3 Fire Stations, because the LHR Project does not generate sufficient annual revenue to cover the operating cost of a 4<sup>th</sup> DSFPD Fire Station dedicated to the LHR Project.**

Given the above background and constraints, none of the three options provided on Page 28 of the FPP are feasible as substantiated below in bold:

**Option 1:** This option includes DSFPD and/or SDCFA and CAL FIRE agreeing that CAL FIRE's Station 15 (Miller Station), would provide primary response to project emergencies. This option would include a new fire station or a remodel of the existing Station 15 site, and a new Type I engine. This would require a new agreement between DSFPD and/or SDCFA, and CAL FIRE. **This Option is not feasible because the Miller Fire Station is not within DSFPD's Jurisdictional Authority. The Miller Fire Station is owned and controlled by another Governmental Agency that does not have the Charter to provide Fire and EMS Services to the entire DSFPD.**

**Option 2:** This option would include a new separate DSFPD fire station on the CAL FIRE Station 15 site in order for such facility to be completely independent from CAL FIRE. This option would include an agreement between DSFPD with CAL FIRE to either remodel Station 15 to co-locate and staff a DSFPD Type I paramedic engine on the site with CAL FIRE or the construction of a completely separate DSFPD station. The new station or remodel would accommodate an engine from station 11 or a new engine purchased for the new facility. This would require an amendment to the existing Amador Agreement with CAL FIRE. **The Miller Fire Station is not within DSFPD's Jurisdictional Authority. The DSFPD's mission is to provide Wildfire, Structural, and Emergency Medical Services for the District. The Miller Fire Station is owned and controlled by the State of California. The primary mission of the California Fire Authority is to provide Wildfire Management for the State of California. The DSFPD does not find it within its Charter and the DSFPD's fiduciary responsibility to the District it serves to enter into a lengthy and complicated**

**inter-agency Agreement that alters the Charter and Missions of both Agencies. This option is not feasible.**

**Option 3:** If an agreement cannot be reached between SDCFA and/or DSFPD and CAL FIRE (Option 1) or between DSFPD and CAL FIRE (Option 2), a new fire station would be constructed within the Lilac Hills Ranch Project. A Type I paramedic engine would be added at the station. The engine could either be reassigned from Station 11 or a new Type I purchased for the Station. The construction of a new fire station would be triggered upon the construction of any lot outside the 5 minute response time, equivalent to the 54<sup>th</sup> unit in Phase 1. If DSFPD agrees, a temporary on-site fire station could be constructed at the same trigger. **This option is not feasible, because there is not enough DSFPD tax revenue generated annually to fund the Annual Operating Cost of a fourth DSFPD Fire Station.**

-DSFPD has stated that the following sequence of serial steps needs to occur before a fact based determination on how to achieve 5 minute Emergency Response Time can be achieved by DSFPD for the proposed LHR Project:

1. DSFPD needs to hire an expert in Operations Research to model how best to provide Services with three fire stations for the entire District, incorporating the large Service needs increase of the LHR Project. The end product would provide the optimum site location potentials for a 3 station DSFPD force. This likely would result in the closure of an existing DSFPD Station and re-siting of the Station on a County Circulation Element Road outside the boundaries of the LHR Subdivision, because this station would have to service other areas in addition to the LHR Project.
2. There is a high probability that the Study in 1) above will make recommendations that require the purchase of land for a different Fire Station Site and the construction of a new facility at that site.
3. It is likely that additional Capital Equipment must be purchased for the new Site in 2) above.
4. DSFPD considers items 1, 2, and 3 above to be Direct Development Impacts that are entirely attributable to the LHR Project. Therefore Accretive Investments must pay these costs in their entirety, not existing DSFPD taxpayers.

In summary, the FPP as published does not demonstrate any feasible method to provide 5 minute Emergency Response Service to the Proposed LHR Project.

This is a factual certain “impact to cause substantial adverse direct and indirect impact on human beings” under the California Environmental Quality Act (CEQA) **and the County of San Diego must find a Mandatory Finding of Significance.**

#### Issue 2 – FPP claims of full compliance with Fire Codes and Ordinances; Road Standards

Fire Codes and Ordinances – DSFPD Ordinance No. 2010-01 is the District’s implementation of the San Diego County Consolidated Fire Code. San Diego County Public Road Standards and separate Private Road Standards are the governing compliance documents for Road Design. The FPP Section 2.2 states as follows:

#### **2.2 Fire Apparatus Access Roads**

“An additional (*sic.*) emergency ingress/egress road is provided to/from the southern portion of the project via existing **Mountain Ridge** Road and Rodriguez Road. Mountain Ridge Road is accessed from Circle R Road, and Rodriguez Road is accessed via **Covey Lane**. These roads will meet County Private

road standards for fire apparatus access and will be gated. These ingress/egress roads and all the interior project road circulation will be constructed to San Diego County Private Road Standards and will provide unimpeded fire apparatus access throughout the project. **Private Road Standards are similar to public road standards with few exceptions.”**

**Mountain Ridge Private Road** – The existing Mountain Ridge private road has a 16.6% Vertical Curve that the Applicant verifies on Sheet 8 of the LHR Master Tentative Map. This exceeds current Private Road Standards as well as being non-compliant with the Consolidated Fire Code.

Mountain Ridge is 2580 feet from the subdivision boundary to Circle R Public Road. Accretive is planning no improvement for Mountain Ridge other than adding 4 feet of paved surface (2 feet on each side). The resulting road does not meet San Diego County Consolidated Fire Code requirements. **The proposed road is non-compliant in Vertical Curve Requirements design and construction and does not meet two San Diego County Private Road Standards parameters. Compliance with San Diego County Road Standards is a requisite condition for compliance with the San Diego County Consolidated Fire Code.**

The road design for the LHR project is based on receiving approval for two Requests For Exemption for Road Standards (RFEFRS) for Mountain Ridge **that are not in compliance with County Road Standards and therefore Fire Ordinance and Codes..**

One RFEFRS (Attachment D) seeks to lower the Design Speed to 15 MPH from 25 MPH while increasing the current traffic load **from 250 Average Daily Trips (ADT) to 2250 ADT** with proposed LHR Project traffic. An independent expert review of the Applicant's Traffic Study has found that the Applicant has understated the proposed LHR Traffic Study an overall 11.9%. There is a very high likelihood that a fair and balanced Traffic analysis will conclude that the cumulative Traffic load of Mountain Ridge Road will exceed the 2500 ADT threshold and will be required to be designed and built to more restrictive Public Road Standards to be compliant with County Road Standards.

The other RFEFRS (also in Attachment D) requests to eliminate the need to construct a portion of the intersection taper feature at the Circle R intersection. This taper enables a large vehicle, such as a Type I Fire Engine to complete a right hand turn from Circle R Drive to Mountain Ridge Private Road.

The Applicant has submitted the June 25, 2013 Sight Distance Analysis enclosed in Attachment E. This document states that the LHR Project as proposed is only able to achieve Sight Distance compliance by using a County Right – that of Prescriptive Easement Access for Brush Clearance – this right is not owned by the Applicant. How does the Applicant propose to legally provide Sight Distance compliance at this intersection?

**Covey Lane** – The Applicant submitted the June 25, 2013 Sight Distance Analysis enclosed in Attachment F for the proposed intersection with West Lilac Lane. This intersection **fails to meet Sight Distance requirements.** Question – Please answer how the Applicant expects to gain the additional rights required to grade a substantial portion of a parcel of land that they do not own rights on to achieve Sight Distance standards compliance.

**Private Road Standards** – San Diego County Private Road Standards are SIGNIFICANTLY relaxed from Public Road Standards in key Safety related areas such as allowable Sight

Distance on Vertical and Horizontal Curves and Intersections, road design, and road materials. Accretive is placing a large percentage of 5,185 people in potential Wildfire evacuation scenarios in smoke filled environments over the same narrow 24 foot roads with Sight Distance Lines that fail County Standards. And Accretive says this is safe?

In summary, the FPP as published does not demonstrate proposed LHR Project compliance with County and DSFPD Fire Codes and Ordinances or County Public and Private Road Standards. Accretive is creating significant Safety Issues, and not providing mitigation.

This is a factual certain “impact to cause substantial adverse direct and indirect impact on human beings” under the California Environmental Quality Act (CEQA) **and the County of San Diego must find a Mandatory Finding of Significance.**

Issue 3 – The FPP focuses exclusively on Wildland fire Hazards – The FPP does not sufficiently address either Structure Fires or Emergency Medical Service (EMS) such that Environmental Impact and mitigations can be assessed.

The term “Emergency Medical Services” is stated exactly twice in the FPP and only as a reference to a legally required service of the District. No analysis of the significant EMS demand load and response issues associated with the proposed LHR project’s disproportionately large Senior Residential Housing population is provided.

The term “structure fire” is stated exactly once in the FPP and only as a reference to a legally required service of the District. No analysis of any of the many Structure Fire hazards and response scenarios that the proposed LHR Ranch induces are performed.

In the Wildland fire discussion in the FPP and DEIR Chapter 2.7 Hazards, there was not a single discussion of Fire Safety Zones (FSZ). FSZ’s are a critical required element of a Wildland Fire Management Plan, indicating areas of topography and fuel load that are unsafe for Fire Personnel entry.

Revise the FPP to include these essential analyses: EMS requirements and response times, Structure Fire Hazard analysis, and Wildland fire FSZ analyses and resubmit the FPP and EIR with an additional 45 day Public Comment Period.

Issue 4 – The FPP doesn’t adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads - Unsubstantiated assertions and conclusions regarding the impacts of use of electronic road gates on fire access roads provided in DEIR Chapter 2.7 – “Hazards” needs to be substantiated by supporting analyses in the FPP.

The inclusion of six electronic gates across fire access roads in Project design is problematic. Additional analysis needs to be performed in the FPP. Particularly troubling scenarios are potential routes that have more than one gate to access in series to provide emergency Fire and EMS services.

Why was the FIGURE 2.7-1 Project Gated Access graphic (Attachment G) not included and it’s Environmental Impacts with respect to human safety discussed in the FPP?

Please revise the FPP to include these vital analyses and resubmit with an additional 45 day Public Comment Period.

Issue 5 - Fuel Modification Zones (FMZ) – Section 5.4 Fuel Management Zones on page 42 of the FPP states “The project includes a few areas where fuel modification zones are less than 100 feet wide. Based on even a quick scan of Figure 1.6 from Chapter 1 of the DEIR (Attachment H) the more accurate and true statement is: **“The project includes extensive areas where fuel management zones are less than 100 feet wide.”**”

Why was Figure 1.6 not included, analyzed, and every exception to the 100 foot FMZ requirement discussed in the FPP and Chapter 2.7 Subchapter 2.7.3.4 Issue 4: Wildland Fires? Please revise both documents to assess these concerns and recycle for a 45 day Public Comment Period so that Environmental Impacts and mitigations can be assessed.

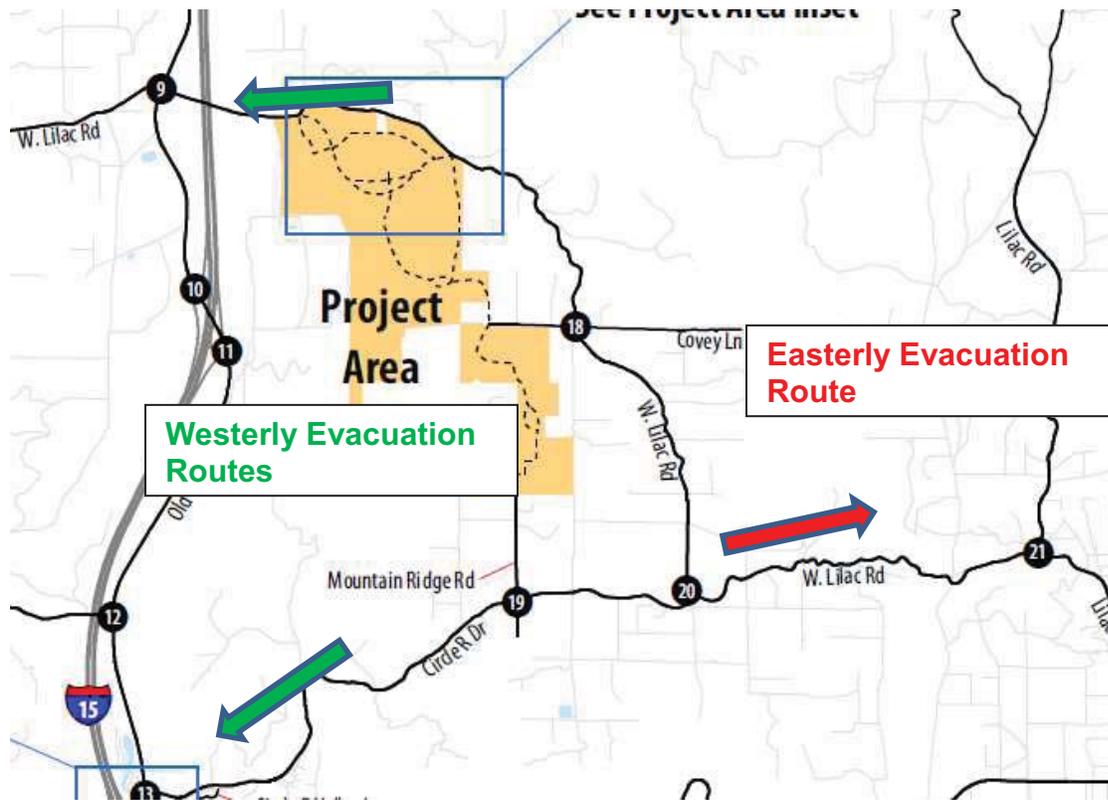
Evacuation Plan - The Evacuation Plan does not address the most fundamental evacuation issue of the Proposed LHR Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed LHR Project added to the existing area rural and semi-rural population.

The LHR Project has but two Public Roads that provide evacuation routes to the West: West Lilac Road to the north and Circle R Road to the South. Both are two lane rural Circulation Element 2.2 E roads for which **Accretive plans no upgrade**. Accretive is brazenly requesting exception to future County upgrade plans for portions of West Lilac Road to be **downgraded** from 2.2 C to 2.2 E capacity.

The LHR Project has but a single evacuation route to the East. That is the easterly section of West Lilac Road that connects to Lilac Road. It is a Circulation Element 2.2 E two lane rural road. The current as built configuration of this road does not meet current 2.2 E road design standards for certain design features, such as paved shoulder width, sight distance, design speed, curve radii, etc. There are no plans to upgrade this road. Accretive does not propose to pay for their direct development impact to this stretch of West Lilac Road.

Please refer to Figure 1 below that illustrates the proposed LHR Project Evacuation Routes:

**Figure 1 – Westerly and Easterly Evacuation Routes**



What would happen if a Wildfire from the East driven by Santa Ana winds with the resulting large smoke plume required sudden Westerly evacuation of the LHR project?

And:

- In the ensuing panic and with obscured vision, a four vehicle accident involving a two axle flatbed truck, a pickup truck with horse trailer, and two cars blocked the West Lilac Bridge over I-15.
- Nearly simultaneously, the fire jumped and sections of Circle R Road were involved, requiring five Fire Crews with Type 3 and Type 1 Engines to be engaged in suppressing the fire, having the effect of blocking Circle R Drive?
- While the rest of the Valley Center Population to the East of the proposed LHR Project is simultaneously attempting to evacuate to the West using West Lilac Road to I-15.

However, the FPP has set us straight on what the more probable risk area is: a large Wildfire from the West.

The FPP recognizes the large fuel load immediately to the east of the I-15 Freeway that hasn't

burned in more than 50 years. In steep terrain. On the Western Border of the proposed LHR Project.

The FPP recognizes that the prevailing winds are from the West.

What would happen in the following scenario? :

- An event, including but not limited to a sudden wildfire from the high fuel zone immediately to the West of the LHR Project requires sudden evacuation of the Project **to the East?**

There is but a single exit route for 5185 people – the narrow, twisting West Lilac Road to Lilac Road. If the evacuation event is caused by a large Wildfire from the West, the ensuing smoke plume will result in panic evacuation over a single treacherous road. There are over 40 existing residential driveways that intersect this section of West Lilac with semi-rural land uses.

What happens in a high smoke environment if a large pickup truck towing a horse trailer overturns and blocks both travel lanes of this road?

In summary, the Evacuation Plan ignores the most fundamental Evacuation issues of the proposed LHR project. The LHR Project Evacuation scenarios enumerated above create significant Safety Issues that have not, and cannot be mitigated.

This is a factual certain “impact to cause substantial adverse direct and indirect impact on human beings” under the California Environmental Quality Act (CEQA) **and the County of San Diego must find a Mandatory Finding of Significance.**

DEIR Chapter 2.7 Hazard Analysis – There are two sections of the Hazard Analysis Cumulative Impacts that directly relate to Fire Protection and Evacuation Plans for the proposed LHR Project:

**2.7.3.3 Issue 3: Emergency Response and Evacuation Plans** - The Applicant states that cumulative impacts are less than significant.

The Evacuation hazards enumerated in this letter raise factual and compelling Public Safety issues with respect to the proposed LHR project.

The LHR Project has not demonstrated that the project can meet the 5 minute Emergency Response requirement for Fire Services.

Addition of 5185 additional persons requiring automobile evacuation in this area that has one easterly and two westerly evacuation routes and no plans to add additional evacuation routes is a huge additive cumulative impact.

This is a factual certain “impact to cause substantial adverse direct and indirect impact on human beings” under the California Environmental Quality Act (CEQA) **and the County of San Diego must find a Mandatory Finding of Significance.**

**2.7.3.4 Issue 4: Wildland Fires** - The Applicant states that cumulative impacts are less than significant.

The Applicant is correct in stating that the LHR Project eliminates fuel load by paving over wild lands and covering the land with asphalt and concrete. However, the Fire and Wildfire hazards enumerated in this letter raise factual and compelling Public Safety issues with respect to the proposed LHR project. The addition of 5185 additional persons requiring automobile evacuation in this area that has one easterly and two westerly evacuation routes and no plans to add additional evacuation routes is a huge additive cumulative impact to Wildland fire hazard analysis.

This is a factual certain “impact to cause substantial adverse direct and indirect impact on human beings” under the California Environmental Quality Act (CEQA) **and the County of San Diego must find a Mandatory Finding of Significance.**

Sincerely,

Mark Jackson  
9550 Covey Lane  
Escondido, CA 92026  
760-731-7327

Attachment A - June 12, 2012 DSFPD to Slovik Ltr. Re: TM – 5571 & 72; LHR Project  
Attachment B - March 5, 2013 DSFPD to Slovik Ltr. Re: LHR Specific Plan  
Attachment C - August 10, 2013 DSFPD to Slovik Ltr Re: LHR Project DEIR  
Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road  
Taper  
Attachment E - June 25, 2013 Mountain Ridge Sight Distance Analysis  
Attachment F - June 25, 2013 Covey Lane Sight Distance Analysis  
Attachment G - Figure 27-1 Project Gated Access  
Attachment H – Figure 1.6 Fuel Modification Zones



## Deer Springs Fire Protection District

8709 Circle R Drive • Escondido, CA 92026 • tel 760-749-8001 • fax 760-749-6572

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June 12, 2012

County of San Diego  
Department of Planning and Land Use  
5201 Ruffin Rd. Suite B  
San Diego, CA 92123

Attn: Mark Slovick, Project Planner

RE: TM-5571 & 5572, Lilac Hills Ranch

The following are the general comments of the Deer Springs Fire Protection District with regard to the Lilac Hills Ranch Project. It must be noted that these comments can only be made in general terms due to the limited information we have received from the developer.

As the Fire Authority Having Jurisdiction for the project, we find the following issues to be of concern:

- The project is sited in a location requiring response times longer than allowed by both the County General Plan, and District guidelines. The developer's proposal to utilize the CAL FIRE Miller Fire Station as the primary fire station for the project is unacceptable. A timely response to incidents within the project will likely require relocation of the District's Headquarters Station #11. Determining the best course of action with respect to the siting of a replacement station would best be handled through hiring an independent consultant of the district's choice to conduct a "standards of cover" assessment for the Deer Springs Fire Protection District. This study would include the impact of the Lilac Hills Ranch Project as well as any proposed or likely development that might impact District operations in the future. This study would be conducted at the developer's expense.
- Roadway lengths, widths, turnarounds, and modifications to existing transportation infrastructure as they relate to ingress and egress for emergency responders as well as for the evacuation of residents, need to be more thoroughly evaluated once additional information is available. Some elements of the submitted roadway designs are unacceptable by district standards. Hammerheads are not permissible for termination of roadways, and must be replaced with cul-de-sacs of no less than 36' improved unobstructed radius, plus parking.
- The proposed traffic calming devices appear to reduce the available space to below acceptable turning radius requirements for district fire apparatus and may be modified or removed per Consolidated Fire Code section 503.4.1.

- All fire apparatus access roads shall be no less than 24' improved unobstructed width, plus parking.
- All backbone roads shall be completed prior to issuance of building permits, and all roads shall be constructed prior to delivery of combustibles including the proposed North/South road that will link West Lilac Road to Circle R Drive. Further, the North/South road should be a public road consistent with all applicable County public road standards and the fire code and provide for secondary ingress and egress prior to the first phase of the project.
- Dedicated public north/south and east/west circulation shall be addressed (CFC 503.2.1)
- Provide full road circulation for all phases.
- More detailed information regarding the types, sizes and uses of structures within the project is needed for a full evaluation of the impacts on the district's response capabilities. Multi story structures, commercial development, solar plant, sewage treatment, and senior living facilities have been mentioned by the developer, but no specific information regarding these structures has been submitted. This will make all-hazards response planning impossible.
- Fire access to open space areas must be provided. Further, islands of vegetation and open space areas must be kept fire safe or modified to the satisfaction of the fire code. A homeowners association should be established to provide for the maintenance of fire safe conditions of fuel modification zones in perpetuity.
- All fire hydrants will be installed and serviceable by all applicable code standards prior to the delivery of combustibles.

Sincerely,



Chris Amestoy  
Fire Chief  
Deer Springs Fire Protection District  
(760) 749-8001

Cc: Cathey Michna, Fire Prevention Specialist, DSFPD  
Cc: James Pine, Fire Marshal, SDFCA (via email)  
Cc: Greg Griswold, Deputy Chief, CAL FIRE (via email)  
Cc: Ralph Steinhoff, Fire Services Coordinator, SDFCA (via email)



**Deer Springs Fire Protection District**  
**8709 Circle R Drive • Escondido, CA 92026**  
**Tel (760) 749-8001 • Fax (760) 749-6572**

Tuesday, March 5, 2013

County of San Diego  
Department of Planning and Land Use  
5510 Overland Ave., Suite 321  
San Diego, CA. 92123

Attn: Mark Slovick, Project Planner

**Subject:** Lilac Hills Ranch Specific Plan  
TM 5571, TM 5572  
SP12-001

The DSFPD has conducted a review of the above listed Specific Plan.

I have reviewed the report and have outlined the necessary requirements and concerns.

The DSFPD requires that this site will comply with the following and adhere to current Fire codes, Building codes and County codes applicable at the time of Project start:

**INTRODUCTION; page I-6:**

**2. Water Resources-** This project is serviced by the Valley Center Municipal Water District (VCMWD) which requires that the fire protection systems service meters be a minimum of one inch (1"), and will be separate from the domestic supply. DSFPD may require a larger meter size, dependent upon building type and usage.

**SPECIFIC PLAN SUMMARY; page II-7:**

**1. Land Use Distribution- (a.) Phasing-** The Deer Springs Fire Protection District (DSFPD) will require that the roadway infrastructure; along with all fire hydrants be installed prior to the allowance of combustibles on the project site.

**Page II-18:**

**3. Community Recreational Elements- (c.) Community Trail Network-** With a proposed trail network of over 16 miles there needs to be several areas that will be accessible to the fire department for emergency incidents on the trails. Please add these access points to the plan for fire department approval.

**Page II-19:**

**D. Circulation Plan- 1. Streets- (b.) Private Roads-** The specific plan refers to all roads within the development as being private and many of the proposed streets do not comply with the County of San Diego Private Road Standards or with the County Fire Code minimum roadway standards. DSFPD has concerns with the one lane one-way Main St. proposal. The street is identified as the most travelled roadway in the development and such a design will not be approved as is. Deer Springs Fire Protection District would consider the one-way roads with the removal of parallel street parking. With the elimination of parallel parking the travel lane would then be sixteen feet (16'), giving fire apparatus an adequate amount of space to pass vehicles in the event of an emergency response. The development's current roadway design greatly limits fire department access and DSFPD is concerned with the install of roundabouts and alleyways greatly impacting fire department response times. The Traffic Calming Intersection Neckdown will not be accepted in this project.

**Figure 24- Project Internal Circulation:**

All automatic gates located within the development are required to have a Knox key switch override system along with an approved emergency traffic control-activating strobe light sensor(s), i.e.; Opticom. The map indicates that there will be a total of five automatic gates starting near Circle R Dr. on Mountain Ridge Rd. and ending at Covey Ln. The amount of gates and their locations will impact fire department response times in to these areas.

**Figure 29- Typical Street Section:**

**Main Street (On-site) -** Minimum acceptable travel lane width is fourteen feet (14') unobstructed width. Plans show that the proposed travel lane will be twelve feet (12'), DSFPD will accept no less than the minimums on this project. All trees planted in the center median will maintain, at all times, a clearance of 13' (ft) 6" (in) over all roadways.

**DEVELOPMENT STANDARDS AND REGULATIONS; page III-13:**

**D. Site Design/Landscape Design- 1. Landscape Concept-** Lilac Hills Ranch is located in a high wildland fire area and will be difficult to access; therefore a minimum FMZ (fuel modification zone) of 100' (ft) will apply to all areas of Lilac Hills Ranch. A landscape plan is required for this project and will need to be submitted to DSFPD for approval.

**Page III-24:**

**9. Fence Concepts-** Any fencing located less than five feet from a building will be non-combustible.

**Page III-38:**

**c. Architecture- Garage/Driveway Design (iv.)-** Pavers are not designed to support the load of a fire apparatus not less than 75,000 lbs, making pavers an unacceptable driveway material.

**Page III-45:**

**F. Fire Protection Plan (FPP)- Standards 1.-** The FMZ (fuel modification zone) will be a minimum of 100' (ft) throughout, but can be increased by DSFPD if necessary.

**TOWN CENTER SECTIONS- FIGURE 75, 76 & 77:**

**North/South Main St.-** Please eliminate parallel street parking as a way to mitigate DSFPD concerns and allow for unobstructed emergency access on these one lane one-way streets.

**IMPLEMENTATION; Page IV-6:**

**1. Required Facilities- e. Fire, Paramedic and Law Enforcement Services and Facilities-** The Lilac Hills Ranch project is located within the service area of Deer Springs Fire Protection District in cooperation with CalFire. A total of three fire stations (Station 11, 12 and 13) make up the District; with Station 11, located at 8709 Circle R Dr. being the closest response. The Specific Plan calls for the Miller Fire Station to be the main provider of emergency services to the development. This is an incorrect statement; the Miller Fire Station is a CalFire station and is not a part of the Deer Springs Fire Protection District. Miller does not have the staff or equipment on the type 3 engine to handle any volume of ALS (advanced life support) medical emergencies, and does not carry the size of fire hose needed on a structure fire response. Along with that, Miller is no longer considered a "must cover" station, and may not be staffed at the time of an emergency. Please reflect this change on the plans.

**Please add this document to the case file as a fire condition**

If you have any questions, please call the Deer Springs Fire Protection District at (760) 749-8001.

Sincerely,

*Alicia M. Perry*

Alicia M. Perry  
Fire Prevention Specialist  
Deer Springs Fire Protection District  
[aperry@dsfd.sdcocmail.com](mailto:aperry@dsfd.sdcocmail.com)



# Deer Springs Fire Protection District

8709 Circle R Drive • Escondido, CA 92026 • tel 760-749-8001 • fax 760-749-6572

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August 10, 2013

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

Mr. Slovick,

The following are comments of the Deer Springs Fire Protection District in reference to the Lilac Hills Ranch Proposal (TM-5571, TM-5572, SP 12-001).

## **Service delivery options for the proposed development:**

The proposals of the developer have consistently held that the CAL FIRE Miller station is the closest and therefore most appropriate fire station location for service to this project. This is a position that is not, and will not be supported by the Deer Springs Fire Protection District (DSFPD). The assumption that the Miller Fire station will be location of primary responders for fires and other emergencies on the project should be summarily dismissed. CAL FIRE is not the fire agency having jurisdiction and the idea of co-located facilities with the DSFPD assumes a permanent relationship between the agencies and presents significant complications should there be changes to the either the CAL FIRE deployment strategy in the area, or a contractual change with the DSFPD or the SDCFA. It must be recognized that the District does not and cannot accept conditions pre-dictating ongoing relationships with other agencies or siting of permanent facilities based on current relationships that may not be similarly permanent.

Further, the District is unable to support an additional facility for provision of a level of service within the project comparable to that received by existing residents based on the projected revenue generated by the project at build-out. The District cannot accept any proposals for service that are fiscally untenable, as it jeopardizes the ongoing provision of service to existing residents. The District is not inclined to consider staffing options that significantly depart from the standard level of service currently provided in the District. Presently, the District provides response with advanced life support engines with three career personnel. Alternate staffing arrangements are not an option as it would result in a disparate level of service at the same or greater level of tax burden.

Given the aforementioned issues, it is the position of the District that in dealing with response to the Lilac Hills Ranch Proposal, there are the following options:

**Option 1:**

**Relocate the existing Station 11 to an agreed upon location within the project area.**

This option would place a replacement facility for the current Station 11 within the project. This option would require a site location that would meet the specified general plan response time needs while maintaining an adequate response to the current residents of the District. A location within the project meeting these criteria is most likely to exist in the southernmost portion of the proposed development. This option will likely require some roadway modifications to satisfy response times to the northern end of the project especially given the phasing plan. Under this option the district would prefer to see unrestricted north/south access through the project with a minimum of traffic calming devices. Additionally, this option will require an evaluation of potential off-site road improvements to Circle R Drive.

A location for this facility would require an evaluation of available sites, and modeling of response times to both the project and existing properties in the district. The cost of this study would be borne by the developer.

It should be noted that Station 11 is a headquarters facility and replacement of the facility will require replacement of the headquarters functions that meet or exceed those currently in place.

**Option 2:**

**Relocate the existing Station 11 to an agreed upon location outside of the project area.**

This option would place a replacement facility for the current Station 11 on a site outside of the project but in a location suitable for achieving acceptable response times for both the project and for existing residents. A location suitable would need to be located through a comprehensive evaluation of available properties and based on modeling of response times. It is likely that some modifications to roadways would be necessary to facilitate response times to areas of the project in order to achieve adequate response.

A location for this facility would require an evaluation of available sites, and modeling of response times to both the project and existing properties in the district. The cost of this study would be borne by the developer.

It should be noted that Station 11 is a headquarters facility and replacement of the facility will require replacement of the headquarters functions that meet or exceed those currently in place.

It should be noted that neither of these options requires the support of additional staffing or equipment. The district feels that these are both realistic options that deserve maximum consideration in the development of this project.

**Additional Comments:**

The FPP continues to have factual inaccuracies regarding the district. The Deer Springs Fire Protection District (DSFPD) operates 3 fire stations (Stations 11, 12, and 13), with 3 front line Type I engines, 2 reserve Type I engines (unstaffed, with one at Station 11, and one at Station 13), 1 Type III engine (Station 12). The district does not employ a fire marshal, but has had a Fire Prevention Specialist during the scope of the FPP's development. The District also employs 1 administrative employee, not 2 as listed.

For purposes of clarity, the Miller Fire Station exists in support of the CAL FIRE mission of suppression of wildland fires in State responsibility areas (SRA). While they represent an important part of the cooperative fire protection system in the region, their statutory mission is to respond to State wildland fires. The station is not equipped or staffed based on the needs of a typical suburban fire department. Even if supplemental staffing or equipment was provided, it is likely that fire activity elsewhere in the state might pull that resource out of the area for protracted periods of time. The "must cover" concept mentioned in the FPP only provides that a CAL FIRE engine from another area of the county or the state (the most recent significant coverage was provided by an engine from San Luis Obispo) will assume coverage of the station at some point. This may cause difficulties in expecting consistent service at a level above what is typically provided by CAL FIRE funded engine companies. Assuming that the development of this project in any way alters the fundamental responsibilities of CAL FIRE is incorrect.

The Miller Fire Station, while in the District, is wholly operated by CAL FIRE during the majority of the year and is not in any way under the operational control of the DSFPD. This relationship can be confusing due to the contractual relationship for staffing with CAL FIRE presently in place within the DSFPD. Additionally, it should be noted that the staffing at the Miller Station during the "Amador" period that is supported by the San Diego County Fire Authority is only 2 personnel, not the 3 personnel that is the standard on DSFPD resources. The Miller Station is a non-paramedic level facility year round.

Finally, the District will expect any project to be built in full compliance with all existing standards, codes, and ordinances for the purpose of providing the maximum level of fire and life safety for our future residents, and for the continuing safety of our responders.

This proposal is of significant concern to the Deer Springs Fire Protection District. If you have any questions or concerns, please contact me at (760) 749-8001.

Sincerely,

Chris Amestoy  
Fire Chief  
Deer Springs Fire Protection District  
8709 Circle R Drive  
Escondido, CA 92026

Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper Page 1 of 5

REDUCED DESIGN SPEED MOUNTAIN RIDGE ROAD

DEPARTMENT OF PUBLIC WORKS

Request for a Modification to a Road Standard and/or to Project Conditions

Project Number: TM 8571/8572 Date of Request: Sep. 13, 2012

Project Location: East side of Interstate 15, southerly of W. Lilac Road in the County of San Diego, State of California.

Thos. Bros. Map/Grid: 1049, 1069 APN: 127-072-46, 127-072-47, 128-280-42, 128-440-01, 128-280-48, 128-280-27, 128-280-10, 128-440-23, 128-280-37, 128-440-05

Requestor Name: Accretive Investments, Inc Telephone: (858) 546-0700

Address: 13276 El Camino Real, Suite 110, San Diego, CA 92130

Requested Modification (attach engineering sketches showing existing layout, details and notes):

The Private Road standard street section is 24' paved, 28' graded within a 40' easement (see Attachment 1). Based on the average daily traffic, the minimum design speed is 25 mph for Mountain Ridge Road. The requested modification to the road standard is to allow for a 15 mph design speed over this existing private road (that was previously built to 15 mph standards as conditioned on an adjacent subdivision).

Reason for requested Modification (provide attachment if additional space is required):

The requested road modification pertains to Mountain Ridge Road (private) north of Circle X Drive (see Attachment 1). At a 15 mph design speed, the existing road would have to be completely rebuilt. Existing vertical curves would have to be lengthened considerably (which would result in some existing driveways no longer being accessible since they are at the sag or peak of the existing curves). These driveways would need to be redesigned and rebuilt, while still access is maintained. Lastly, the newly designed road would require permission to grade from multiple neighbors. The cost and time to acquire these approvals would be considerable (if they would even be given from adjacent hostile neighbors).

List alternatives that could mitigate the requested Modification (attach engineering sketches showing proposed layouts, details and notes):

Redesign/reconstruct entire existing road and 2 retaining walls.

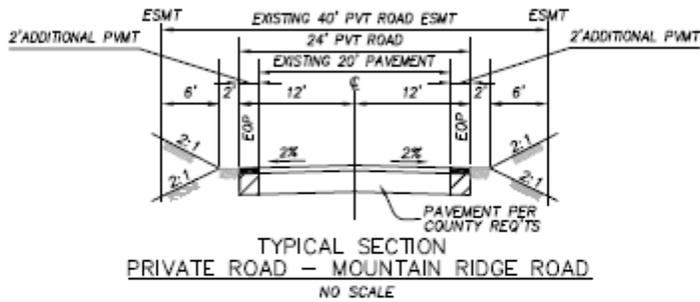
Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3. on reverse): The impact to the existing homes on this road would be tremendous and the need for permission to grade letters from a large number of neighbors could cause serious delays (and/or kill this project). Also, the additional costs to reconstruct this entire road and add many large retaining walls would be prohibitive. Access to some of the existing driveways (on the sags or peaks) may not even be possible. Finally, the existing Bio Open Space Easement would be impacted if the 25mph design was constructed.

Provide Design and Cost Estimate for meeting the Condition (see note 3. on reverse):

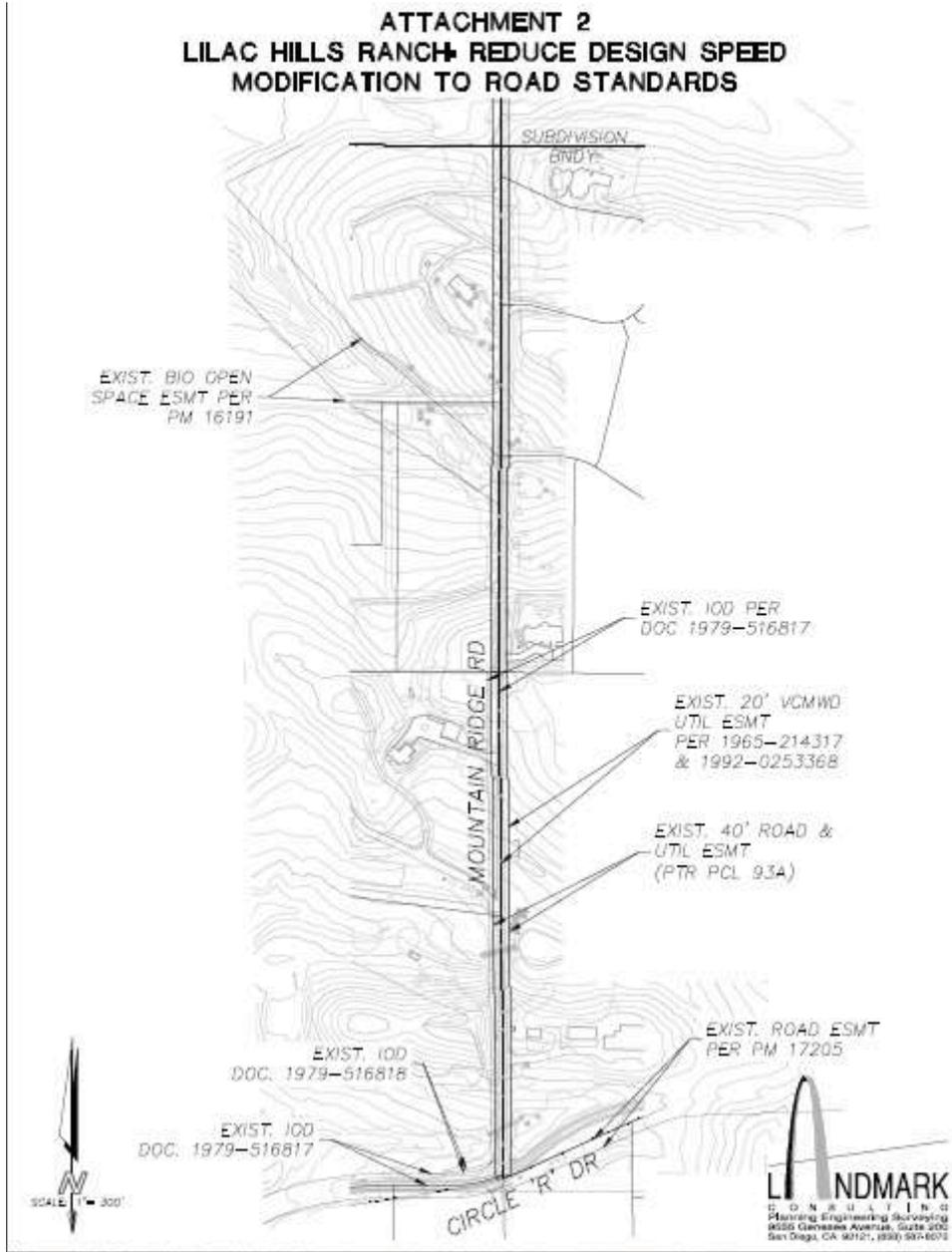
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See reverse for directions and important information.

**ATTACHMENT 1**  
**LILAC HILLS RANCH: REDUCE DESIGN SPEED**  
**MODIFICATION TO ROAD STANDARDS**



**ATTACHMENT 2  
LILAC HILLS RANCH REDUCE DESIGN SPEED  
MODIFICATION TO ROAD STANDARDS**



Attachment D - September 12 and 13, 2012 RFEFRS Mountain Ridge Design Speed and Road Taper Page 4 of 5

MOUNTAIN RIDGE ROAD @ CIRCLE 'R' - TAPER

DEPARTMENT OF PUBLIC WORKS

Request for a  
Modification to a Road Standard  
and/or to Project Conditions

Project Number: TM 5571/5572 Date of Request: Sep. 12, 2012  
Project Location: East side of Interstate 15, southerly of W. Linn Road in the County of San Diego,  
State of California. 127-872-30, 127-872-34 127-872-36, 127-872-41 127-872-43,  
Thos. Bros. Map/Grid: 1040, 1055 APN: 22-872-46 22-872-47, 228-260-62 228-440-21, 228-280-46  
128-280-27, 128-280-28, 128-440-22, 128-280-37 128-440-20  
Requestor Name: Acrotive Investments, Inc Telephone: (619) 546-5720  
Address: 12278 El Camino Real, Suite 110, San Diego, CA 92130

Requested Modification (attach engineering sketches showing existing layout, details and notes):  
The County Public road standard for the angle between centerlines at intersections is  
to be as nearly a right angle as possible and in no case less than 70 degrees or greater  
than 110 degrees. Angles between 70-80 (or 100-110)degrees will require a taper on the  
acute angle for right turn movement. The requested modification to the road standard  
is to waive this requirement for a taper.

Reason for requested Modification (provide attachment if additional space is required):  
This requested road modification is located at the intersection of Mountain Ridge Road  
and Circle R Drive, where the existing centerline of Mountain Ridge intersects Circle R  
at 72 degrees. This would require a taper for right turns from westbound Circle R Road  
onto Mountain Ridge Rd. Currently there is no right-of-way on this portion of Circle R  
Road and no room for a taper (see Attachment 1). This offsite property owner is hostile  
project and could hold up the entire project. Also, the traffic movement from westbound  
Circle 'R' Drive to northbound Mountain Ridge Road is very minimal.

List alternatives that could mitigate the requested Modification (attach engineering sketches showing proposed layouts, details and notes):  
Redesign Mtn Ridge Rd to approach Circle R at 90 degrees

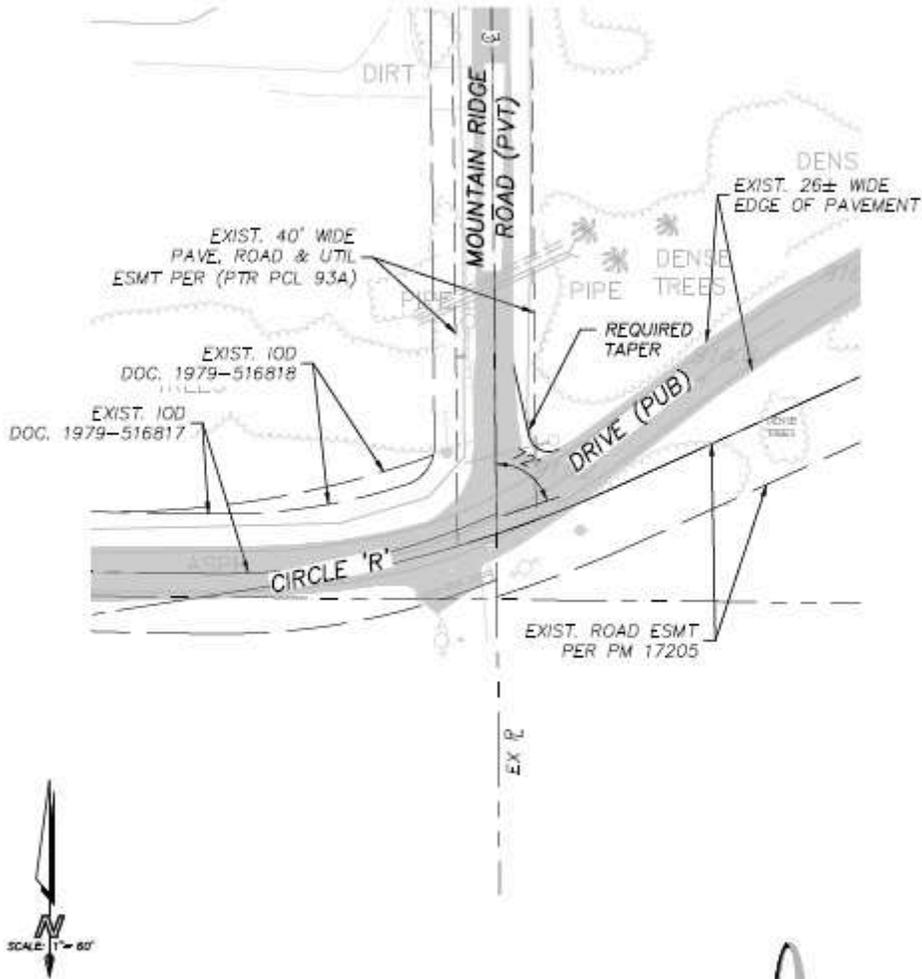
Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3. on reverse):  
A taper cannot be achieved without acquiring an additional road easement from a neighbor  
that is against any form of development and improvements. There is virtually no traffic  
movement that would benefit from this right turn taper.

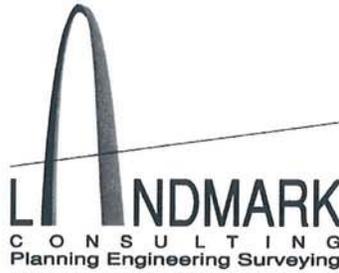
Provide Design and Cost Estimate for meeting the Condition (see note 3. on reverse):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

See reverse for directions and important information.

Revised: Aug 30, 2007

**ATTACHMENT 1**  
**LILAC HILLS RANCH TAPER FOR RIGHT TURN MOVEMENT**  
**MODIFICATION TO ROAD STANDARDS**





June 25, 2013

Mr. Jon Rilling  
 Accretive Capital Partners, LLC  
 12275 El Camino Real, Suite 110  
 San Diego, CA 92130

**RE: Lilac Hills Ranch (TM 5571) - Sight Distance Analysis at Circle R Drive and Mtn Ridge Rd**

Dear Jon:

Per your request, we have conducted the Sight Distance Analysis at the intersection of Circle R Drive and Mountain Ridge Road in Valley Center (see Figure 1 - Vicinity Map) to determine adequate sight distance per the San Diego County Public Road Standards requirements. For this analysis, it was assumed the existing alignment of Mountain Ridge Road would remain the same as it approaches Circle R Drive from the north.

The speed survey was completed between September 11, 2012 and September 16, 2012 by National Data and Surveying Services. Average speeds range from 34.7 to 37.0 mph while the 85<sup>th</sup> percentile, speeds were in the range of 41.3-44.0 mph (see table below). For this analysis, a 45 mph prevailing speed was used. Per the County of San Diego sight distance requirements, the minimum corner intersection sight distance is 450' for a prevailing speed of 45 mph.

Circle R Drive, just east of Mountain Ridge Road						
	ADT	Average Speed (mph)		85th Percentile Speed (mph)		Heavy Vehicle %
		EB	WB	EB	WB	
Weekday	1,822	34.7	36.7	41.3	44.0	2.0%
Weekend	1,407	34.5	37.0	41.5	44.0	2.5%

The line of sight from Observation Point 'B' looking east is of 450' has been achieved due to recent clearing performed in April 2013 along the existing public road within APN 129-390-18 between the existing pavement of Circle R Drive and an existing public road easement granted per PM 17205. It is recommended that this area be kept clear by means of preventative maintenance to maintain adequate sight distance at this Intersection. The County has prescriptive easement rights to this portion of Circle R Drive, a public road. Since the required clearing area is between the existing pavement to the north and an existing public road easement to the south, the County should have the right to clear this area to establish the required line of sight to assure public safety for the use of this existing public road as part of their normal maintenance responsibilities. However, a clear space easement should be obtained over this area (as illustrated on Figure 2) from the offsite property owner (APN 129-390-18) to ensure maintenance rights in perpetuity. Additionally, this clearing area falls within the 50' fire buffer area required by the Deer Springs Fire Protection District along all existing property lines.

The current line of sight for the eastbound traffic as seen from Observation Point 'B' on Mountain Ridge Road looking west toward Object Target 'C' on Circle R Drive is also adequate and neither maintenance nor clearing is recommended at this time.

Profiles through both lines of sight and photos are provided for clarity (Figures 3-6).

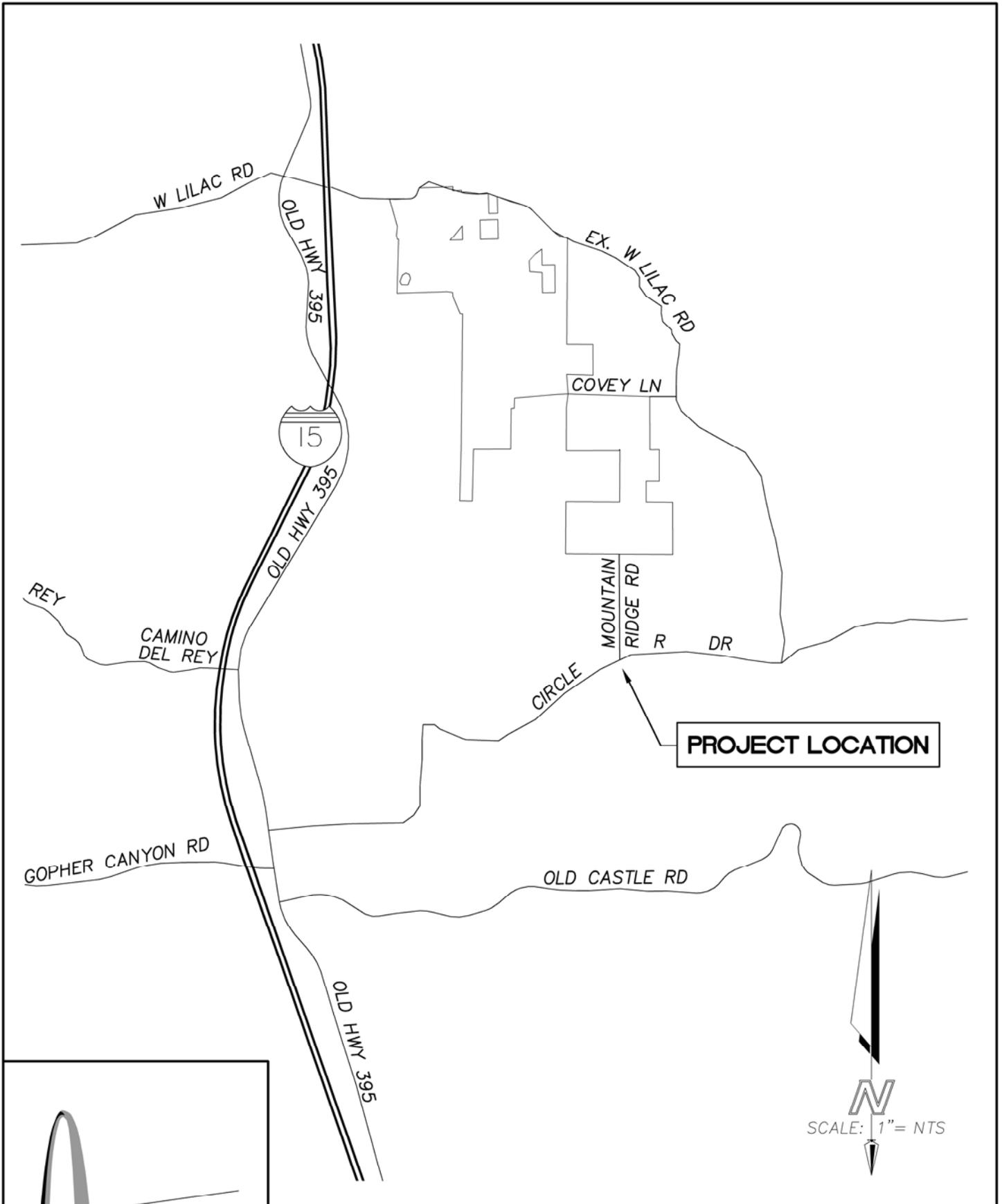
If you have any particular questions or require additional information, please do not hesitate to call.

Sincerely,  
 LANDMARK CONSULTING



Mark A. Brencick, P.E., P.L.S.  
 President

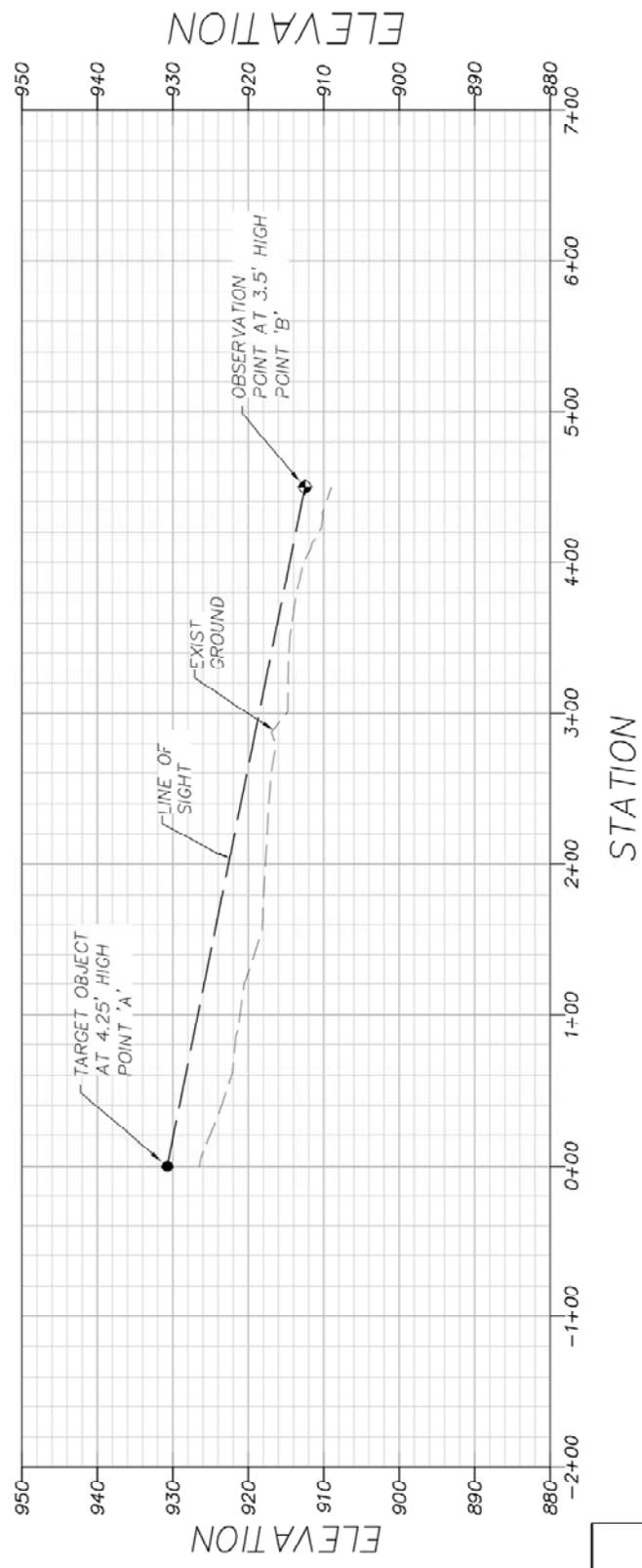
F:\Dropbox\103-7\Drawings\ALT 1\Exhibits\Sight Distance Analysis\Circle R Mountain Ridge\2013-06-25\Sight Distance Analysis - Circle R and Mtn Ridge at Lilac Hills Ranch.docx



**FIGURE 1**  
**VICINITY MAP**

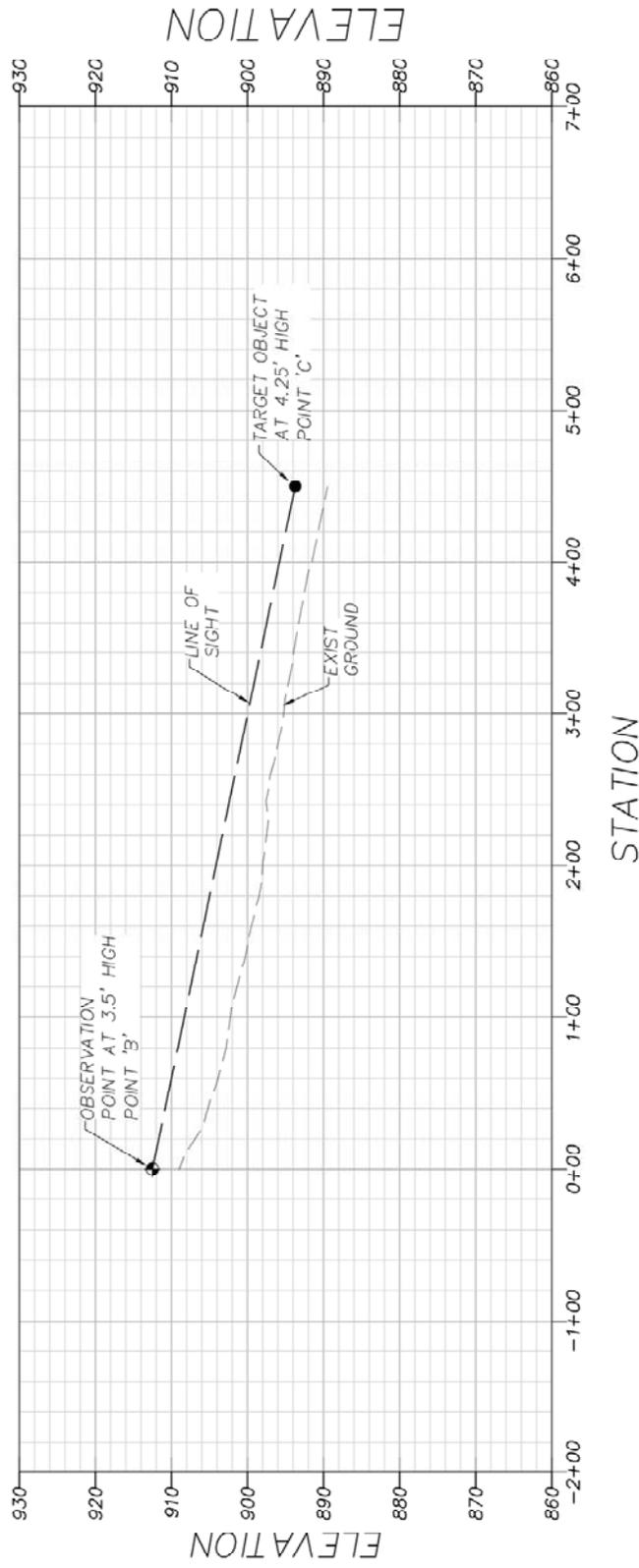


**PROFILE: CIRCLE R EAST**



**FIGURE 3**  
**LINE OF SIGHT PROFILE FOR MTN RIDGE RD AND CIRCLE R DR (WESTBOUND TRAFFIC)**

**PROFILE: CIRCLE R WEST**



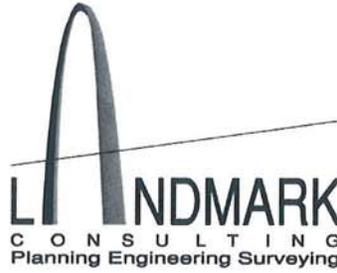
**FIGURE 4**  
**LINE OF SIGHT PROFILE FOR MTN RIDGE RD AND CIRCLE R DR (EASTBOUND TRAFFIC)**



FROM MOUNTAIN RIDGE ROAD LOOKING WEST ONTO  
CIRCLE "R" DRIVE



FROM MOUNTAIN RIDGE ROAD LOOKING EAST ONTO  
CIRCLE "R" DRIVE



June 25, 2013

Mr. Jon Rilling  
 Accretive Capital Partners, LLC  
 12275 El Camino Real, Suite 110  
 San Diego, CA 92130

**RE: Lilac Hills Ranch (TM 5571) - Sight Distance Analysis at West Lilac Road and Covey lane**

Dear Jon:

Per your request, we have conducted the Sight Distance Analysis at the intersection of West Lilac Road and Covey Lane in Valley Center (see Figure 1 - Vicinity Map) to determine adequate sight distance per the San Diego County Public Road Standards requirements.

The speed survey was completed January 2013 by National Data and Surveying Services. Average speeds range from 25 to 42 mph while the 85<sup>th</sup> percentile speeds were in the range of 31-48 mph (see table below). For this analysis, a 48 mph prevailing speed was used for the northbound traffic on West Lilac Road south of Covey Lane; and 40 mph for the southbound traffic on West Lilac Road north of Covey Lane. Per the County of San Diego sight distance requirements, the minimum corner intersection sight distance is 480' for a prevailing speed of 48 mph, and 400' for a prevailing speed of 40 mph.

West Lilac Road at Covey Lane				
Roadway	Segment	Direction	Average Speed	85% Percentile Speed
Covey Lane	West of L. Lilac Road	EB	25	31
		WB	28	35
W. Lilac Road	North of Covey Lane	NB	34	41
		SB	34	40
	South of Covey Lane	NB	42	48
		SB	38	44

Currently, the maximum line of sight distance from Observation Point 'B' looking south toward Object Target 'C' on West Lilac Road is 330' assuming no clearing or grading is completed. A line of sight distance of 480' can be achieved by grading and clearing dense trees and brush in an area on property APN 129-190-44. In order to mitigate for the 480' Line of Sight distance requirement, a clear space easement with grading rights should be obtained (as illustrated in Figure 2).

The current line of sight for the southbound traffic as seen from Observation Point 'B' on Covey Lane looking north toward Object Target 'A' on West Lilac Road was adequate; no improvements or clearing will be required.

Profiles through both lines of sight and photos are provided for clarity (Figures 3-5).

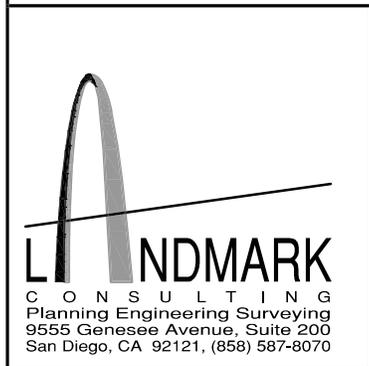
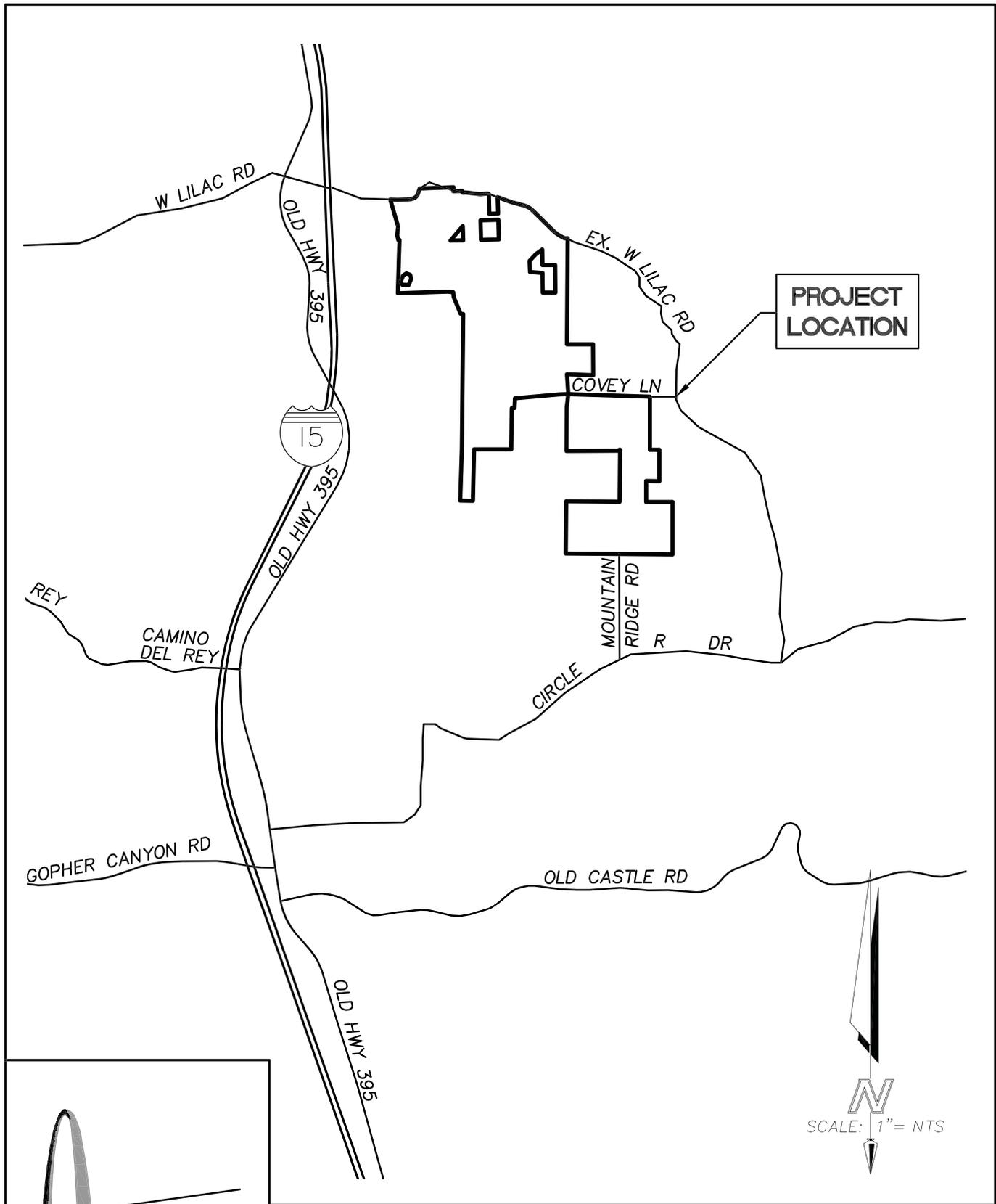
If you have any particular questions or require additional information, please do not hesitate to call.

Sincerely,

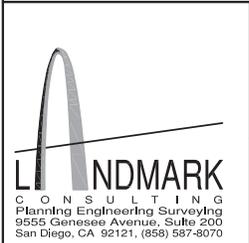
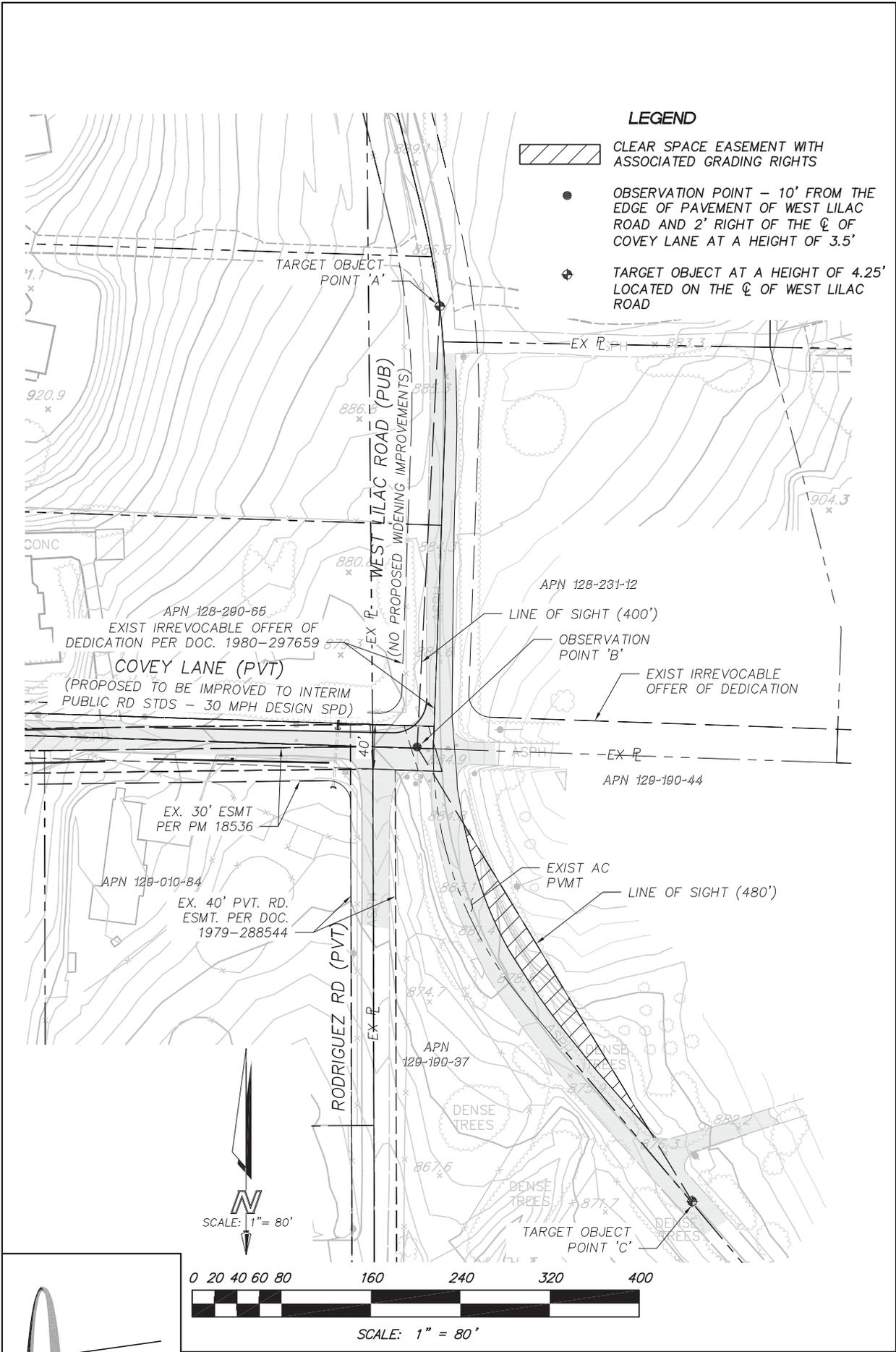
LANDMARK CONSULTING

Mark A. Brencick, P.E., P.L.S.  
 President



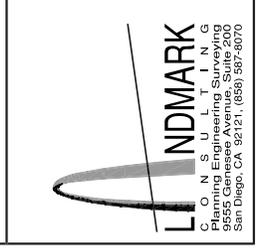
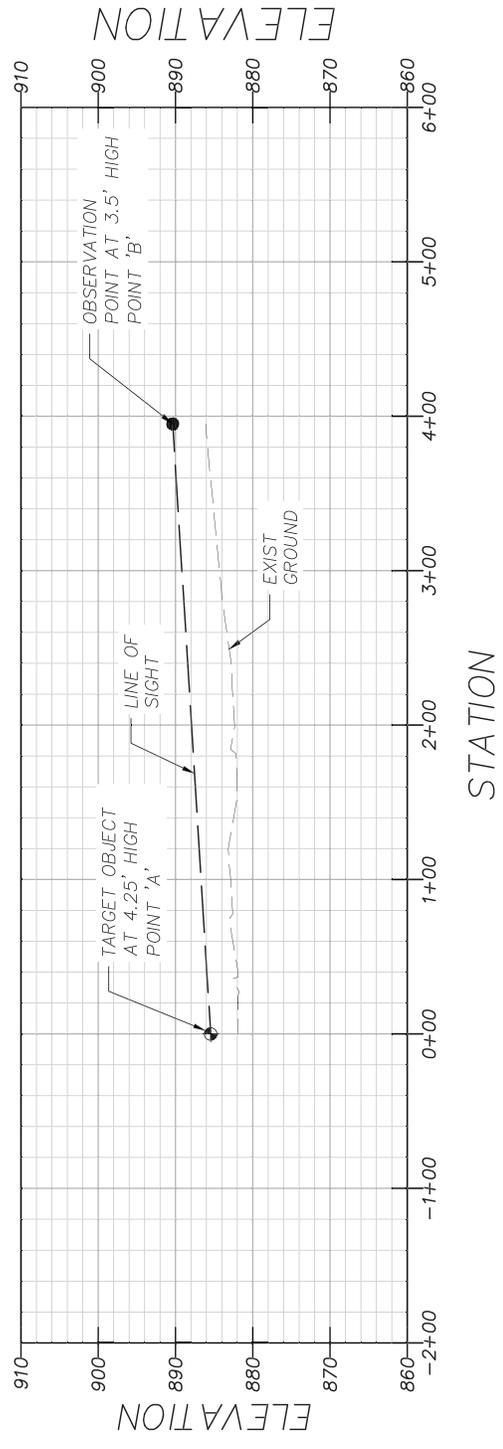


**FIGURE 1**  
**VICINITY MAP**



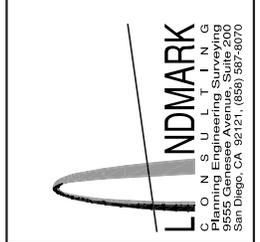
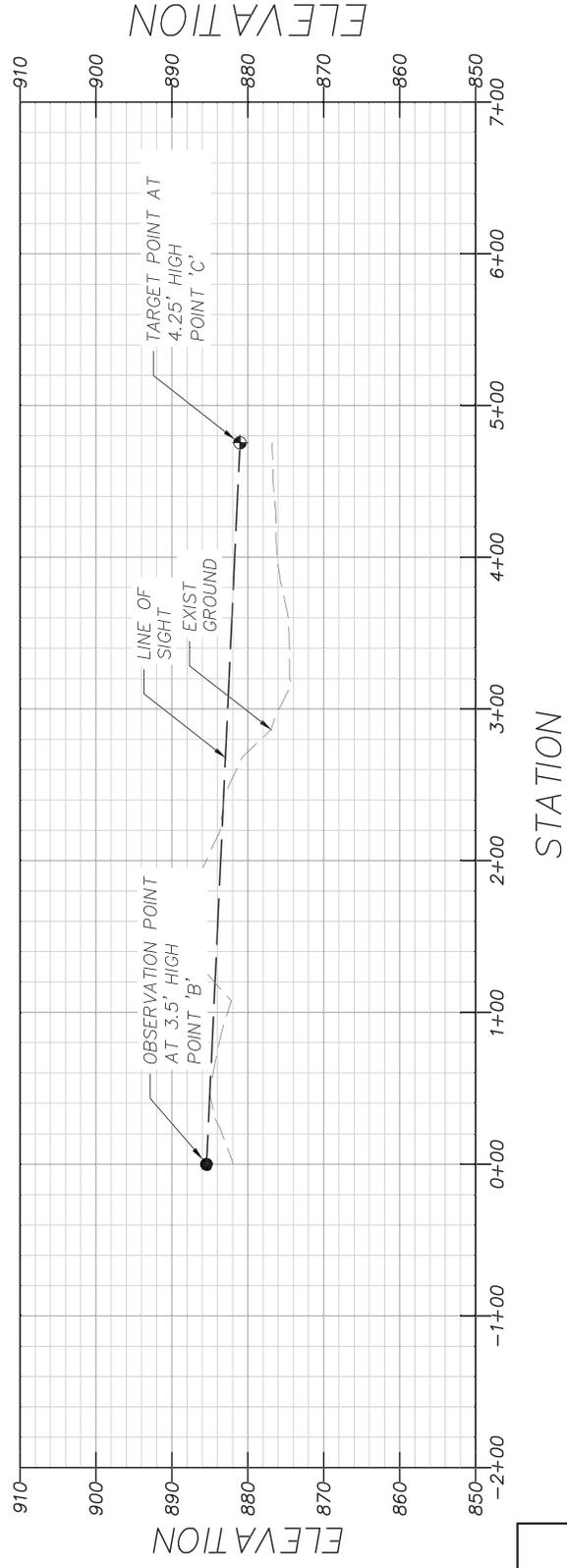
**FIGURE 2**  
SIGHT DISTANCE ANALYSIS  
WEST LILAC ROAD AND COVEY LANE

**PROFILE: W LILAC NORTH**

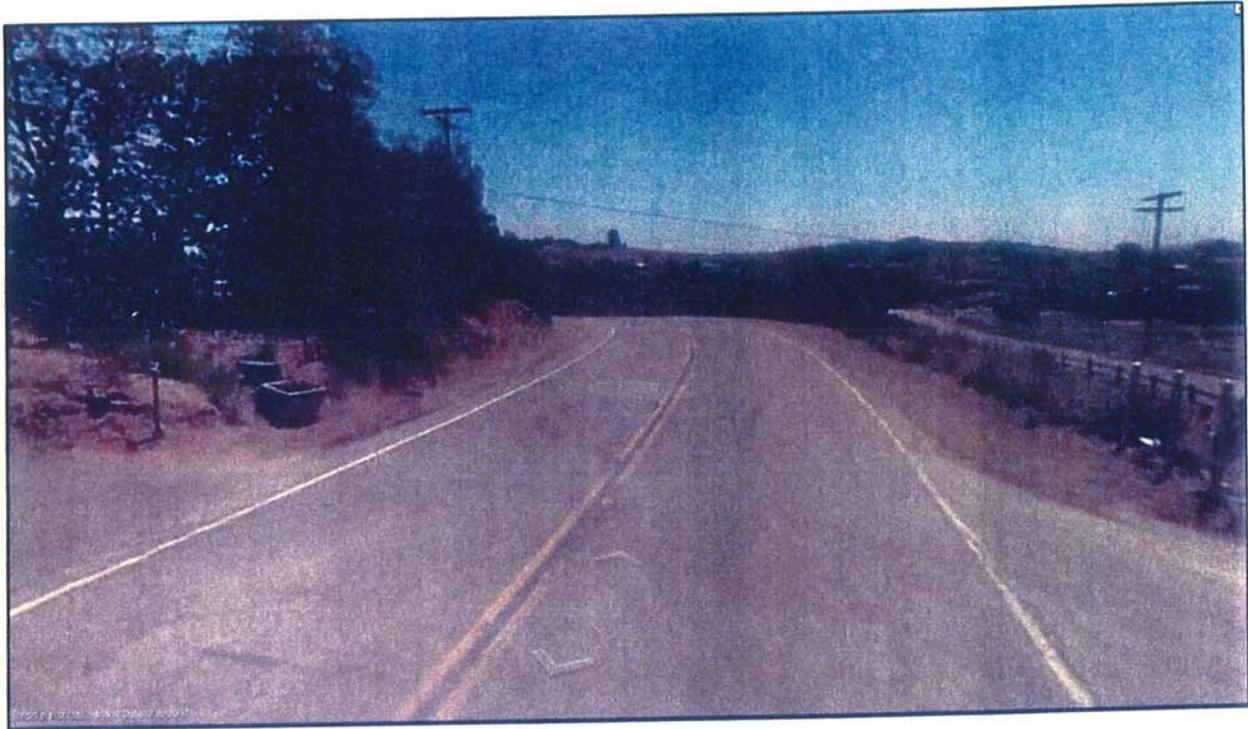


**FIGURE 3**  
 LINE OF SIGHT PROFILE FOR WEST LILAC ROAD AND COVEY LANE (SOUTHBOUND TRAFFIC)

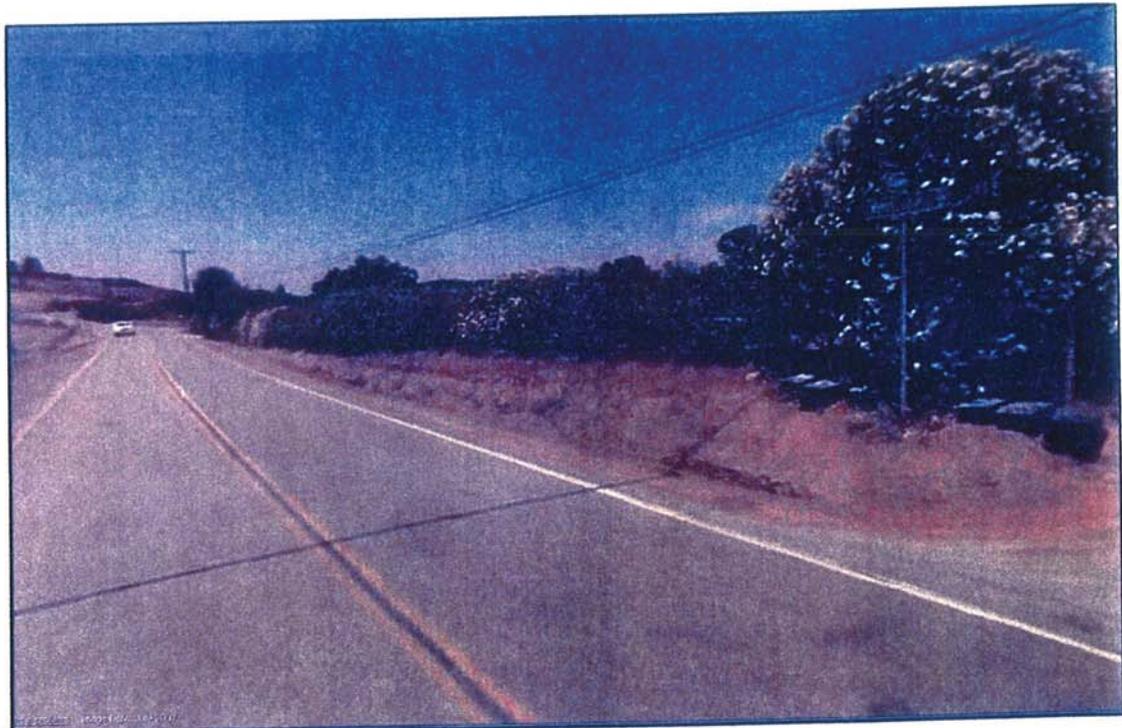
**PROFILE: W LILAC SOUTH**



**FIGURE 4**  
 LINE OF SIGHT PROFILE FOR WEST LILAC ROAD AND COVEY LANE (NORTHBOUND TRAFFIC)

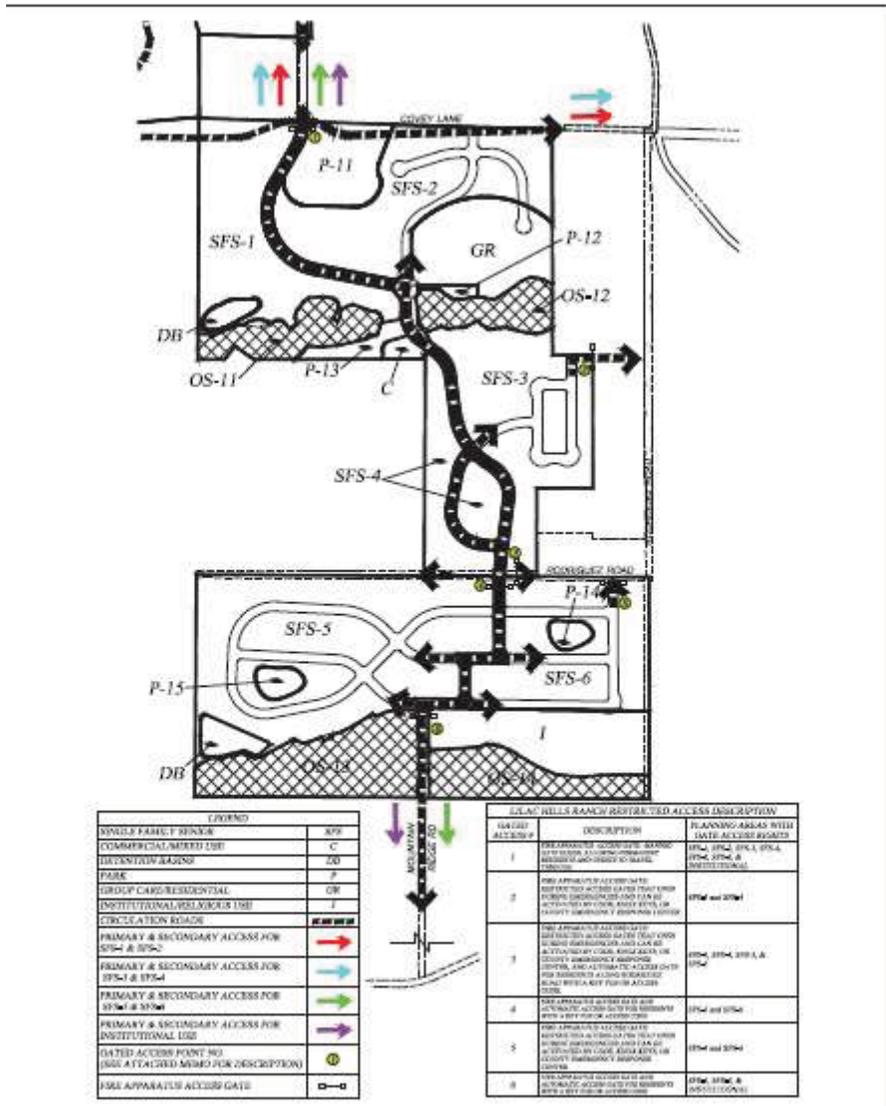


LOOKING SOUTH



LOOKING NORTH

Attachment G - Figure 27-1 Project Gated Access

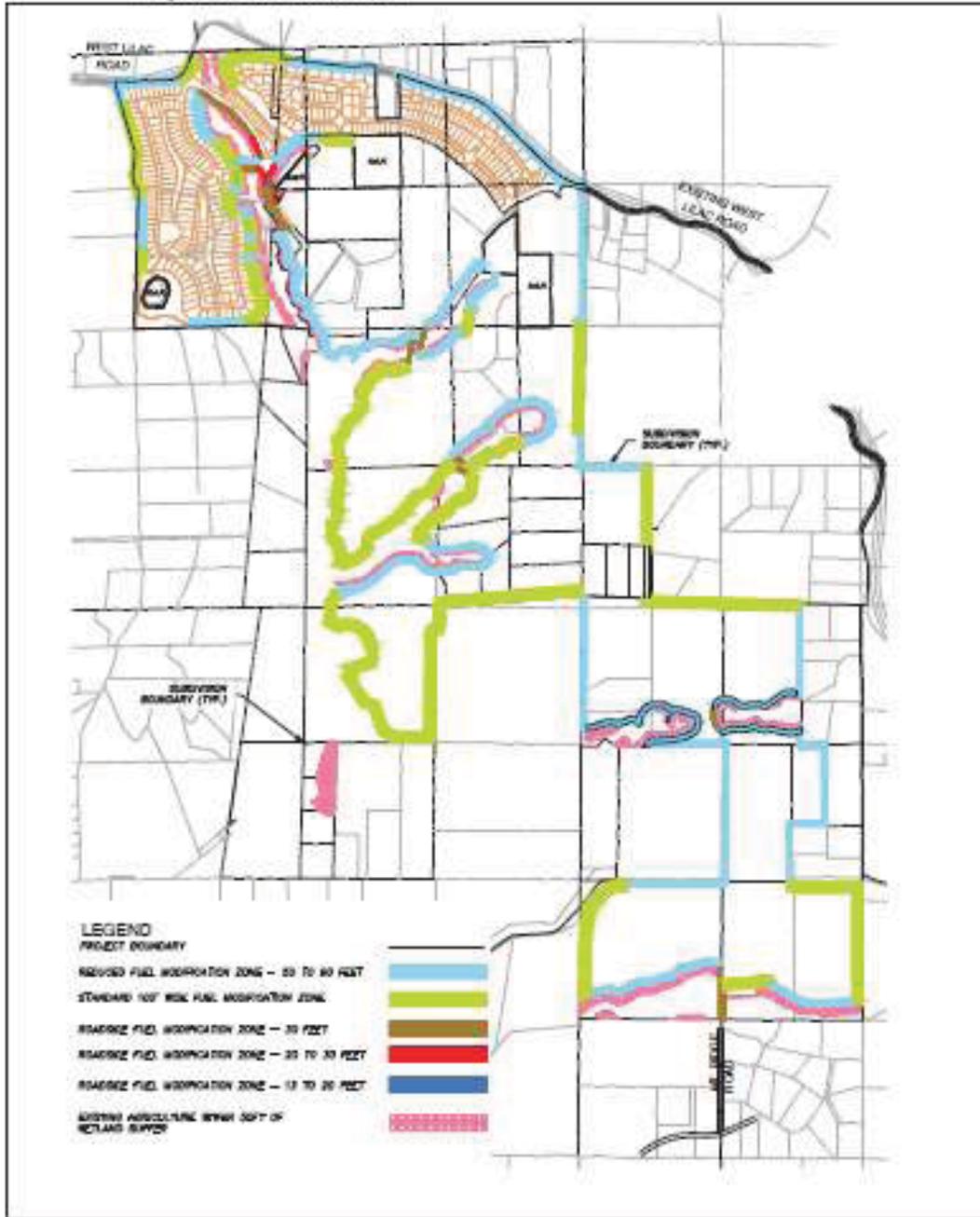


Not to Scale

FIGURE 27-1

Attachment - Figure 1.6 from Chapter 1 – LHR DEIR

Image Source: Vance and Associates, 2013



Not to Scale



FIGURE 1-6  
Fire Protection Plan

RECON

4100000123awgphoatp1-1a1

08/01/12

August 16, 2013

To: Mark Slovick, Project Manager  
County of San Diego Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
[Mark.Slovick@sdcounty.ca.gov](mailto:Mark.Slovick@sdcounty.ca.gov)  
[\(858\) 495-5172](tel:(858)495-5172)

**Subject:** 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), DEIR Chapter 2.8 Noise; Noise Report of the proposed Lilac Hills Ranch (LHR) Project

By way of brief summary, the County has failed to include assessment of Impact areas which are directly related to the proposed LHR Project Noise generation. The Noise analysis was not performed for these Noise Sensitive Land Uses (NSLUs), Environmental Impact is impossible to assess.

There are contradictory values for projected Community Noise Evaluation Level (CNEL) values presented without reconciliation of the differing values.

The evaluation of Existing Noise Conditions appears too limited and not at the correct locations to establish a meaningful baseline for assessment of the Noise Impacts of the proposed LHR Project.

A major component of the proposed LHR Project is Traffic Generated Noise. The Noise Analysis relies on the June 28, 2013 Chen Ryan Traffic Impact Study assessment of Average Daily Trips (ADTs) Traffic volume and distribution. The August 16, 2013 Darnell Associates Independent Expert review of the Chen Ryan Traffic Impact Study presents factual evidence that the Chen Ryan Traffic Impact Study understated the Traffic volume and distribution. The reliance on the deficient Chen Ryan Traffic information directly affects the Noise modeling employed by Recon resulting in inaccurate Traffic Generated Noise levels.

Significant potential Impacts outside the Subdivision boundaries are not evaluated, or properly evaluated and need to be.

#### **A. Impacted existing NSLU's not evaluated for Noise Impacts**

TABLE 12 – “FUTURE OFF-SITE NOISE LEVELS AT SPECIFIC LOCAL RECEIVER LOCATIONS” p. 47 of the Noise Report has errors and exclusions of key existing NSLU's.

Every Assessor Parcel Number (APN) listed in the Table is incorrect. Please correct this deficiency.

Also, Figures 6a and 6b geo-locate On-Site Local Receiver locations, and provide a reference back to Table 12. Figure 7 for Off-Site Local Receivers does not label Local Receivers with a reference back to Table 12. Remedy this by labeling Figure 7 Off-Site Receivers with a reference back to Table 12. Also, include a Table in similar format to Table 9 which cross references Off-Site Local Receivers to map locations.

Rodriguez Private Road is indicated on Sheet 9 of 9 of the Tentative Parcel Map. Rodriguez Road is being improved to a 24' paved surface. Consequently, the Traffic Study should indicate the traffic volume and the Noise Report should assess Traffic Generated Noise for all NSLU's along the route of Rodriguez Road.

There is no indication in the discussion beginning at page 47 of the Noise Report that the Noise Impacts of Rodriguez Private Road increased traffic volume directly related to the proposed LHR Project was assessed. Please discuss specifically if and how Rodriguez Road is included in the Noise modeling results.

The following NSLU's on the eastern border of Rodriguez Road were not included as Specific Local Receivers in Table 12 "Future Off-Site Noise Levels at Specific Local Receiver Locations" p.47 of the Noise Report:

APN 129-190-37-00  
APN 129-190-30-00  
APN 129-380-01-00

Were these NSLU's assessed as Local Receivers? If not, why were these residential NSLU's omitted from analysis??

## **B. Contradictory CNEL Values for the same Local Receiver Location**

Table 12 at p. 47 of the Noise Report specifies a predicted future Noise Level of 54 CNEL for 128-290-77-00 (APN corrected to proper value from the erroneous value in Table 12). This Assessor Parcel Number corresponds to the existing residence at 9550 Covey Lane.

Table 13 (page not numbered) "**TABLE 13 - CUMULATIVE OFF-SITE TRAFFIC CNEL AT 100 FEET FROM CENTERLINE (continued)**" lists an existing value of 44.2 CNEL and a LHR Project Build out value of 55.7 CNEL at the LHR project eastern boundary, which is approximately 190 feet from the property line of the 9550 Covey Lane NSLU.

From **2.3.2 Cumulatively Significant Noise Impacts** p, 56 "The nearest residence to the future centerline of Lilac Hills Ranch Road is approximately 200 feet to the west and 50 feet north of Covey Lane, which would result in a combined noise level of 61 CNEL at the building façade." This location is the residence at 9550 Covey Lane.

There is a conflict with the cumulative CNEL value as presented in the text on Page 56 with Table 13's value. Which value is correct?

### **C. Evaluation of Existing Noise Conditions**

Please discuss and justify the following regarding the baseline Existing Noise Conditions evaluation taken Wednesday, July 25, 2012 between 11am and 3:30 PM:

1. Why were only 8 locations evaluated? Please justify the adequacy of the 8 location sample size to construct a rational baseline for the project.
2. Please elaborate in detail the rationale for each of the 8 site locations selected.
3. Please elaborate in detail and justify the use of 15 minute mid-afternoon single samples as an adequate baseline for establishing Existing Noise Conditions.

### **D. Traffic Generated Noise Analysis relies on the June 28, 2013 Chen Ryan Traffic Impact Study**

Table 12 - "FUTURE OFF-SITE NOISE LEVELS AT SPECIFIC LOCAL RECEIVER LOCATIONS" p. 47 of Noise Report is presented as the basis for ADT traffic volume for modeling the LHR project Traffic Generated Noise.

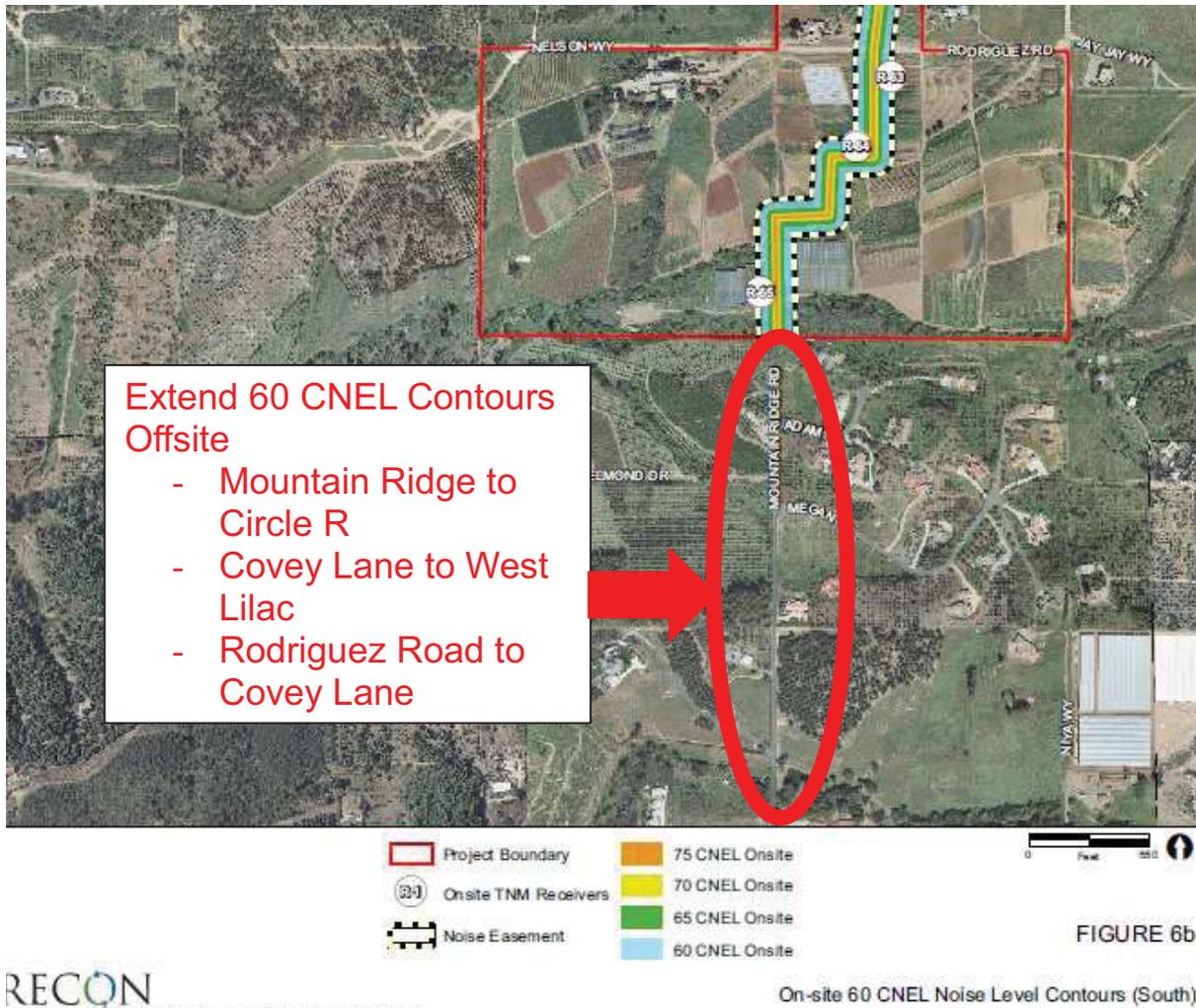
The August 16, 2013 Darnell Associates Independent Expert review of the Chen Ryan Traffic Impact Study submitted as Public Comments for the LHR DEIR presents factual evidence that the Chen Ryan Traffic Impact Study (TIS) understated the Traffic volume and distribution.

In summary, the Chen Ryan TIS understated ADT trip generation 11.9%. Additionally, Chen Ryan overstated internal trip capture, which would change ADT distribution assignment to area roads. Further, the Darnell August 16, 2013 Independent Study assigns far greater traffic volume to Mountain Ridge and Covey Lane Private Roads, where a large population of Offsite NSLU receivers are located.

The reliance on the deficient Chen Ryan Traffic information directly affects the Noise modeling employed by Recon resulting in inaccurate modeling of Traffic Generated Noise levels.

Fact based assessment of Noise Impacts mandates revision of the Chen Ryan Traffic Impact Study, and corresponding revision of the Traffic Generated Noise modeling from RECON.

### **E. Impacts outside the Subdivision Boundaries**



The 60 CNEL Noise Level Contour Graphic needs to be extended to include the Off-Site Impacts for ALL of the Projects Secondary Access Roads:

- Mountain Ridge from the Subdivision boundary to Circle R Drive
- Covey Lane from the Subdivision eastern boundary to West Lilac Road
- Rodriguez Road to Covey Lane

This Graphic will highlight several areas of inconsistencies in the DEIR Subchapter 2.8 – Noise and the Noise Report.

For example, DEIR Subchapter 2.8 – Noise **2.8.2.1 Issue 1: Traffic Generated Noise** p.28 -8:

“Existing receivers along Mountain Ridge Road south of the project site would experience a potentially substantial increase in ambient noise levels of 8 CNEL, however, noise levels within 100 feet of the roadway centerline would be 53 CNEL or less.”

When Mountain Ridge Private Road traffic volume is increased to the levels indicated in

the August 16, 2013 Darnell Associates Independent Expert Review, and the 60 CNEL Noise Level Contour line is plotted on Mountain Ridge, in excess of 60 CNEL will be indicated at the residential façade at 31013 Mountain Ridge (APN 129-430-13-00).

This Graphic will highlight other Off-Site Impacts where Cumulative Noise Levels exceed County Standards on Covey Lane and Rodriquez Road.

### **Summary**

DEIR Subchapter 2.8 – Noise and the Noise Report have many significant errors and omissions, and the reports rely on the flawed LHR Traffic Impact Study.

Informed Environmental Analysis is impossible to perform with this flawed information.

Please revise DEIR Subchapter 2.8 and the Noise Report and notice and recirculate for Public Comment.

Sincerely,

Mark Jackson  
9550 Covey Lane  
Escondido, CA 92026  
[jacksonmark92026@gmail.com](mailto:jacksonmark92026@gmail.com)  
760-731-7327

August 16, 2013

**To:** Mark Slovick, Project Manager  
County of San Diego Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
[Mark.Slovick@sdcounty.ca.gov](mailto:Mark.Slovick@sdcounty.ca.gov)  
[\(858\) 495-5172](tel:(858)495-5172)

**Subject:** 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), EIR Project Objectives

Dear Mr. Slovick:

The project “objectives” as identified in the DEIR and applied to the specific project site, are inconsistent with the General Plan and the two local Community Plans. In some cases, the “objectives” are meritless and not useful in critically thinking about project “Alternatives”. Collectively, the group of selected “objectives” erroneously assumes there is a need for a brand new, independent Town/Village in the middle of a rural community without essential infrastructure. Functionally, the objectives are crafted and used in a biased fashion to select alternatives that are then ruled out by the objectives themselves.

**Objective 1** – The full text of Objective One with comment areas highlighted is below:

“Develop a community within northern San Diego County in close proximity to a major transportation corridor consistent with the County’s Community Development Model for a walkable pedestrian-oriented mixed-use community.”

Develop a community within northern San Diego County in close proximity to a major transportation corridor – The County General Plan, approved just two years ago, before the LHR project application was moving forward, accommodates more growth than SANDAG population forecasts project. There is no need for the project’s proposed housing combinations in the proposed location. There is also no need or requirement to convert land that is designated by the Community Model for agriculture, large animal keeping and estate residential in order to accommodate an additional Village with urban densities in Northern San Diego County.

Importantly, the existing Valley Center Villages (designated by SANDAG as a “Smart Growth Opportunity Area”) are in close proximity to and efficiently connected to the I-15 major transportation corridor. Specifically, both the North and South Village nodes are traversed by Valley Center Road which was improved at a cost of \$50 Million to facilitate intensified commercial and residential development of Valley Center’s central valley. A traditional crossroads since the late 1800s when Valley Center was homesteaded, the

area has designated in the Community Plan for compact village development since the first community plan in the 1960s. Valley Center Road is a 4 lane road with raised medians, specifically a Circulation Element 4.1A Major Road from Woods Valley Rd south to the city of Escondido, and from Lilac Rd. to Miller Rd. The other segments of Valley Center Road through the North and South Villages are 4.2A Boulevard roads. This slightly lower classification reflects the traffic impacts of interconnection with North and South Village traffic flows.

In stark comparison, the proposed Lilac Hills Ranch Project contemplates overburdening 2.2 E and F two lane, narrow winding country roads to Level of Service E and F and requests **ten Exemptions to County Road Standards** on the circulation roads that the project will utilize. The Project proposes adding 22,000 plus Average Daily Trips required by this automobile based commuter community.

Functionally, the Project is not “in close proximity” to the I-15 freeway. Reality is that the granite hills require a twisting, slow 1 ½ mile trip to I-15 south and 3 miles north to I-15 North, from the closest northern point of their development.

From the south at Circle R Drive it is 3.0 miles of the lowest grade of public road in the County to reach I-15 at Gopher Canyon.

Importantly, the project applicant itself (and their self- serving “objectives”) does not have legal right-of-way to use Mountain Ridge and Covey Lane private roads for the Project. It also does not own legal right of way, nor can it require legal right-of-way without the use of Eminent Domain, to build the proposed Covey Lane/West Lilac Road intersection in compliance with minimum County Sight Distance Line standards.

From a full disclosure standpoint, it is misleading to tell the public that the project is in “close proximity” to a major transportation corridor without an analysis of the ability of this Project to mitigate impacts, to safely manage its traffic burden and to pay for the direct off-site impacts of the Project’s congestive Level E and F Level of Service.

In contrast, the “Smart Growth” vision and guiding principles that are essential foundations for the entire County General Plan, has led to planned growth being re-directed to enlarged Village areas where road and sewer infrastructure is in place. Conversely, the new General Plan directs growth away from the more rural countryside.

The General Plan growth in housing units across the entire County of San Diego is summarized in Table 1-1 below.

Table 1-1 San Diego County General Plan Housing Unit Forecast 2010-2050

CPA	Housing Units				Percent Change			
	2010	2020	2030	2050	2010-2020	2020-2030	2030-2050	2010-50
Alpine	6,535	6,690	7,875	9,157	2.4%	17.7%	16.3%	40.1%
Barona	202	170	170	170	-15.8%	0.0%	0.0%	-15.8%
Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%	19.5%	58.7%
Central Mountain	2,182	2,305	2,589	2,735	5.6%	12.3%	5.6%	25.3%
County Islands	614	607	607	635	-1.1%	0.0%	4.6%	3.4%
Crest-Dehesa	3,562	3,677	3,926	3,978	3.2%	6.8%	1.3%	11.7%
Desert	3,546	3,453	4,337	6,923	-2.6%	25.6%	59.6%	95.2%
Fallbrook	15,929	16,535	18,559	20,387	3.8%	12.2%	9.8%	28.0%
Jamul-Dulzura	3,234	3,372	4,398	5,263	4.3%	30.4%	19.7%	62.7%
Julian	1,711	1,748	1,884	2,015	2.2%	7.8%	7.0%	17.8%
Lakeside	27,575	28,517	30,339	30,915	3.4%	6.4%	1.9%	12.1%
Mountain Empire	3,023	3,056	3,903	5,108	1.1%	27.7%	30.9%	69.0%
North County Metro	16,114	19,548	24,090	25,946	21.3%	23.2%	7.7%	61.0%
North Mountain	1,527	1,759	2,002	2,388	15.2%	13.8%	19.3%	56.4%
Otay	7	490	2,035	2,156	6900.0%	315.3%	5.9%	30700.0%
Pala-Pauma	1,980	2,285	3,037	4,399	15.4%	32.9%	44.8%	122.2%
Pendleton-De Luz	7,531	8,533	8,684	8,797	13.3%	1.8%	1.3%	16.8%
Rainbow	708	750	881	963	5.9%	17.5%	9.3%	36.0%
Ramona	12,376	12,692	14,107	15,140	2.6%	11.1%	7.3%	22.3%
San Dieguito	10,993	11,053	11,924	13,601	0.5%	7.9%	14.1%	23.7%
Spring Valley	20,533	20,939	21,837	21,952	2.0%	4.3%	0.5%	6.9%
Sweetwater	4,670	4,657	4,732	4,732	-0.3%	1.6%	0.0%	1.3%
Valle De Oro	15,543	15,648	16,022	15,968	0.7%	2.4%	-0.3%	2.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	36.9%	102.0%
Unincorporated Area	170,608	180,431	202,882	222,890	5.8%	12.4%	9.9%	30.6%
San Diego County	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	11.6%	32.0%

SOURCE: SANDAG Profile Warehouse: 2050 Forecast

Please note that the Lilac Hills Ranch project requires General Plan Amendment, and is not included in the estimate of projected Housing Units in Table 1-1, which is based on the August 2011 San Diego County General Plan.

For the entire County of San Diego Housing Units are increasing 32 % from 2010 to 2050.

Valley Center Housing Units as reflected in the August 2011 General Plan are growing 102% from 2010 to 2050, **more than 3 times** the rate of the County overall. This growth is largely in the North and South Villages, which are located where suitable infrastructure is (Roads, Sewers, Schools) located in Valley Center. There are no provisions in the General Plan to provide the requisite infrastructure in the remote proposed site of Lilac Hills Ranch to support urban village land use densities. The two central Villages in the San Diego County General Plan and the Valley Center

Community Plan located in the traditional town center is the logical place for Valley Center to provide more than its fair share of housing for the County.

Bonsall Housing Units as reflected in the August 2011 General Plan are growing 59% from 2010 to 2050, **nearly 2 times** the rate of the County overall. Growth is also planned at the traditional town center, close to the intersection of SR-76 and Mission Road, where necessary infrastructure for dense, urban development is in either on the ground or planned (and funded) to be added shortly.

The combined composite effects of adding Lilac Hills Ranch in addition to General Plan growth is provided in Table 1-2 below:

Table 1-2 Bonsall and Valley Center Composite Housing Unit Analysis

	<i>Housing Units</i>				% Growth from 2010		
	2010	2020	2030	2050	2010 to 2020	2020 to 2030	2010 to 2050
Bonsall	3,875	4,320	5,149	6,151	11.5%	19.2%	58.7%
Valley Center	6,638	7,627	9,795	13,411	14.9%	28.4%	102.0%
Subtotal General Plan	10,513	11,947	14,944	19,562	13.6%	25.1%	86.1%
Lilac Hills Ranch (LHR)		746	1,746	1,746			
Total with LHR included	10,513	12,693	16,690	21,308	20.7%	31.5%	102.7%
Reference: SD County growth	1,158,076	1,262,488	1,369,807	1,529,090	9.0%	8.5%	32.0%

The ONLY mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389 (Attachment A). The closest access is at SR 76 and Old Highway 395, a minimum 4 mile trip north from the project site. These routes run eight times a day and mainly link the Pala, Pauma, Rincon and Valley View Casinos to the Escondido Transit Center. If you are going to a regional shopping center or work center, you must take a 30 minute bus ride to the Escondido Transit Center and transfer to another route.

The mass transit system only works if you are a Casino patron.

**consistent with the County's Community Development Model** – This Project is not consistent with the San Diego County Community Development Model. **It is Inconsistent with the Community Development Model which is a subset of the San Diego General Plan.**

The General Plan states (San Diego County General Plan: Land Use Framework; Community Development Model, p.3-6): *“The Community Development Model directs the highest intensities and greatest mix of new uses to Village areas, while directing lower-intensity uses such as estate-style residential lots and agricultural and agricultural operations to Semi-Rural areas .... To facilitate a regional perspective the Regional Categories of Village, Semi-Rural and Rural Lands have been applied to all privately-owned lands ...”*

Clearly, the Community Development Model is not a moveable, abstract concept. If this were true then Village “puzzle pieces” could be dropped into Semi-Rural and Rural lands anywhere in the County and pronounced consistent with the Community Development Model.

Rather, the Community Development Model reflects a complex of planning principles and ideas that are expressed through the General Plan’s Regional Categories. It is the assignment of a particular Regional Land Use Category to a particular piece of land that this SP/GPA proposes to amend. The proposal therefore is inconsistent with the Community Development Model. Again, consistency would be achieved only by amending the General Plan to fit the project.

- In the General Plan (p 3-7) *“Village areas function as the center of community planning areas and contain the highest population and development densities. Village areas are typically served by both water and wastewater systems. Ideally, a Village would reflect a development pattern that is characterized as compact, higher density development that is located within walking distance of commercial services, employment centers, civic uses, and transit.”*
- The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This proposal to plop a Village into the middle of an area that the Community Development Model designates for Semi-Rural and Rural development requires AMENDING the Community Development Model.
- Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model, which has been applied in Valley Center’s central valley and which this proposal defies, requires a “feathering” of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth.
- This SP/GPA is located many miles from areas that the Community Development Model designates for Village development: miles from employment centers, shopping, entertainment, medical services, and civic organizations and activities.
- As for infrastructure, there are few existing roads in the area and they are built and planned to service Semi-Rural and Rural development, as is the current plan. Despite proposing intense Village development, the proponents also propose to retain or reduce capacities of these roads. Additionally, Accretive does not have legal rights to use Covey Lane and Mountain Ridge Private Roads for the purposes

indicated in the LHR Specific Plan and supporting plans and documents. Water infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service.

- The intent of the Community Development Model for Villages is to intensify development in existing Villages -- not to create NEW Villages through the destruction of Semi-Rural and Rural lands. The Community Development Model was applied in Valley Center during the General Plan update process. Village boundaries were drawn. Village densities were planned to feather from the commercial and mixed use core to meet the Semi-Rural designations. The majority of the Valley Center community's future development is now planned for the "Village" areas in the center of the Valley Center Planning Area, at the community's traditional "crossroads" where road, water and wastewater infrastructure, as well as schools, churches, shops and businesses are already in place.

a walkable pedestrian-oriented mixed-use community. There are two issues with this part of Objective 1. The first issue is that the Specific Plan is so NON-SPECIFIC on what the Commercial, Schools, and Parks content of this Project is that **one cannot assess whether anyone walking would reach a desired service of any kind.**

The second issue is that "walkability" is usually defined a ½ mile one way trip. The large majority of the Commercial zoning is in the Northern town center, which is a 1 ½ mile one way trip from the Southern boundary of the Project. People in the South (1 ½ mile) and Middle (1 mile) of this project won't walk to the town center, and the two small commercial areas planted in the Middle and South to create a façade of "a walkable pedestrian community" are not credible walkable destinations. In fact, this creates Urban Sprawl internal to the Lilac Hills Ranch Subdivision.

2.

**Objective 2** – The full text with comment areas highlighted is below:

"Provide a range of housing and lifestyle opportunities in a manner that encourages walking and riding bikes, and that provides public services and facilities that are accessible to residents of both the community and the surrounding area."

in a manner that encourages walking and riding bikes - With 10 Exceptions to Road Standards, the Covey Lane/West Lilac intersection with its Sight Distance line that does not meet County Road Standards, and the traffic load the Project will throw on internal and external roads, **who is gonna risk taking a walk or riding a bike?**

public services and facilities that are accessible to residents of both the community and the surrounding area – There are two issues with this statement.

The first issue: what **are** the public services and facilities in this Project? A vague statement about a K-8 school site without any commitment to financing or endorsement

by the School District, a vague description of the minimum acreage of Parks the County requires? Does the undefined Commercial content include a Supermarket or community market? A restaurant of any kind? A retail gasoline service station?

The second issue: “accessible to residents of both the community and the surrounding area” – Accretive’s Traffic Impact Study does not show an influx of non-residents to the area. **Is this because the Applicant is overly optimistically portraying the true Traffic Impact of this Project?**

3.

**Objective 3** – The full text is below:

“Provide a variety of recreational opportunities including parks for active and passive activities, and trails available to the public that connect the residential neighborhoods to the town and neighborhood centers.”

There is no demonstrated need for these recreational amenities in the rural environment that exists on and around the project site. Further, the DEIR does not even attempt to address the issue of adding to or upgrading recreational facilities in other areas in Valley Center, including in and around the existing Villages..

4.

**Objective 4** - The full text with comment areas highlighted is below:

“Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.”

There are three issues with this Objective. The first issue is that the Objective is **so vague and subjective that compliance is not measurable.**

The second issue is with the highlighted statement: “Integrate major physical features into the project design, including major drainages, and woodlands”

How is taking 608 acres of Rural Land primarily involved in Agriculture, disturbing 440 acres, and creating large areas of impermeable surfaces consistent with this Objective? The Project includes 83 acres of road surface and 68 acres of manufactured slopes. Is it desirable to increase storm water runoff surface water velocity in concrete channels that increase downstream siltation in the runoff? How does this benefit the woodlands?

The third issue is with the highlighted statement that follows: “creating a hydrologically sensitive community in order to reduce urban runoff.”

From our analysis of the Accretive Hydromodification Design, we find the analysis is marginal; requiring rainwater collection and storage from rooftops and a total of 23

acres of permeable paving to meet Hydrology requirements with the indicated preliminary design. The truth of the matter is that Accretive is proposing covering large areas of rural farm land with impermeable surfaces. If the Hydro design is compliant, it achieves compliance only in the most optimistic scenarios with scant margin. **Is this what a hydrologically sensitive community is?**

5.

**Objective 5** – The full text is below:

“Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.”

The project as proposed will still destroy sensitive natural resources. The fact that it will preserve some resources on site is not a reason to fail to look at an alternative that will save all the resources on site. If the DEIR is fairly going to use this “Objective” to select and discount project alternatives, it needs to specifically analyze the differences in conservation outcomes amongst and between the project alternatives. Further, the DEIR must include a thoughtful analysis of alternative sites for all or part of the project.

6.

**Objective 6** – The full text with comment areas highlighted is below:

“Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.”

The mixed-use and senior housing are included in the Project to achieve the densest possible development yield. The Applicant has added a 200 bed congregate care facility on top of the 1746 Equivalent Dwelling Units, stating that because there is only one communal kitchen, the huge facility technically doesn't add EDU's.

The Applicant in truth has located its “Senior Housing” in Phase 4 and 5 to “spin” the myth that the proposed LHR Project has acceptable Traffic Impacts. Senior dwelling units have the lowest Trip Generation rates for Traffic Impact assessment.

Accretive has limited rights for Covey Lane and Mountain Ridge private roads, which are the required Fire Access exits for Phase 4 and 5. Accretive is “spinning” a second myth that the senior community land uses do not overburden their limited easement rights for private roads.

The reality is that a Senior Community placed in the proposed Lilac Hills Ranch remote location far from Medical Services and shopping will create a larger traffic burden than the SANDAG Trip Generation Tables indicate. This is because the trip generation for SANDAG Senior Residences is based on San Diego County statistical facts. And factually, the majority of Senior Residential Communities are sited in areas where necessary infrastructure and services are in close proximity. Lilac Hills Ranch lacks

necessary infrastructure and services and will require longer and more frequent trips for Senior residents to acquire necessary services.

The jumbled aggregation of “senior orientated” land uses aren’t properly thought out from an available Community Services standpoint – it is an attempt (that fails) to Design around deficient legal rights-of-way for roads.

In this Objective, **the County re-brands dense Urban Sprawl as a desired attribute.**

7.

**Objective 7** – The full text is below:

“Provide the opportunity for residents to increase the recycling of waste.”

Having an on-site recycling facility is not the only opportunity to increase recycling of waste.

The General Plan density Community could and should partner with the County to provide local centralized brush chipping. The mulch generated has the benefit of reducing landfill usage or lowering Greenhouse gases by avoiding burning the brush, creates mulch that improves plant growth while lowering water consumption, and the brush clearance lowers fire risks. This is a single example of how any of the alternatives provide opportunities for residents to recycle waste.

Fairly considered, all of the Alternatives comply with this Objective equally.

8.

**Objective 8** – The full text is below:

“Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.”

This objective, unless fairly treated as achievable at alternative locations in the Valley Center Community or in the surrounding North County communities, serves only as a preconceived basis to reject project alternatives that are anything less than the full project on the specific project site.

Further, the DEIR should look at how developing a Project at the proposed General Plan densities and preserving existing agriculture and residential based businesses (such as the existing Accretive Agricultural Office located on 32444 Birdsong Drive) on the same or nearby parcels could achieve Objective 8 perhaps better than the proposed project.

## **Summary**

The proposed LHR Project meets very few of its own Objectives and the Objectives are used in the DEIR as tools to limit the range of Alternatives discussed and to reject Alternatives that are consistent with the General Plan. The “Objectives” for the project should be adjusted with the primary goal of building a project consistent with the County’s new General Plan.

Sincerely,

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Attachment A: North County Transit District Breeze Bus Routes 388 and 389

August 16, 2013

To: Mark Slovick, Project Manager  
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**Subject:** DEIR Public Comments Regarding Traffic Related Land Use, Safety and Mobility Element General Plan Consistency Comment with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovik:

Please find below the following General Plan Consistency Comments with respect to Traffic related Land Use, Safety and Mobility General Plan Policies.

The verbatim policy is provided in quotations and our comments are the immediately following paragraph.

### **Comments on Consistency with Traffic, Road Design and Safety Aspects of the San Diego County August 3, 2011 General Plan Policies**

#### **Land Use Element Policies**

##### **LU-2.9 Maintaining Rural Character:**

“Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS where appropriate.”

**Consistency Analysis** – The proposed Lilac Hills Ranch (LHR) Project is inconsistent with this policy in the following areas. The LHR Project proposes addition of Internal Urban density roads with on-road parking lanes that are inconsistent with maintaining the rural character of surrounding Rural Land Uses

##### **LU-12.2 Maintenance of Adequate Services:**

“Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.”

**Consistency Analysis** – The proposed Lilac Hills Ranch (LHR) Project is TOTALLY inconsistent with this policy in the following areas. *The project proposes to downgrade W. Lilac Road between Main Street and the planned Road 3 from the classified 2.2C to 2.2F.* The LHR Project proposes placing an additional automobile load of 20,000 Average Daily Trips on the surrounding roadways more than the adopted General Plan approved uses.

The LHR Project increases traffic on local Private and Public Roads approximately **15 times** greater than from the traffic generated by the approved General Plan

At build out the LHR Project Traffic Load exacerbates cumulative road capacity in the surrounding areas with the numerous unmitigated impacts:

### ***2.3.S. 1 Significant Direct Impacts:***

The project would have significant direct impacts to each of the road segments listed below. The mitigation for each impact is also listed, as well as the conclusion as to whether the impact would be mitigated.

- Gopher Canyon Road, between E. Vista Way and I-15 SB: No feasible mitigation. Impact would remain significant and unavoidable.
- E. Vista Way, between Gopher Canyon Road and Osborne Street: No feasible mitigation. Impact would remain significant and unavoidable.
- E. Vista Way, between SR-76 and Gopher Canyon Road: No feasible mitigation. Impact would remain significant and unavoidable.
- West Lilac Road, between Old Highway 395 and Main Street: Impact would be mitigated through improvement of the road segment to Mobility Element Road Classification 2.2C, subject to exceptions as approved by the County. Impacts would be reduced to less than significant and the project would have a significant

direct impact to each of the roadways listed above. We disagree with Chen Ryan's analysis that states that the direct impact is mitigated to less than significance by addition of traffic lights at these intersections because turn lane are not added at the intersections.

### ***2.3.S.2 Significant Cumulative Impacts:***

The project would have a significant cumulative impact to each of the roadway segments listed below. The magnitude of the impacts below cannot possibly be mitigated by the small amount of LHR project contribution in TIF fees. The impacts will remain as significant unmitigated impacts.

- Camino Del Rey between Old River Road and West Lilac Road;
- Gopher Canyon Road between E. Vista Way and I-15 SB Ramps;
- E. Vista Way between SR-76 and Gopher Canyon Road;
- E. Vista Way between Gopher Canyon Road and Osborne Street;
- Pankey Road between Pala Mesa Drive and SR-76;
- Lilac Road between Old Castle Road and Anthony Road; and
- Cole Grade Road, between Fruitvale Road and Valley Center Road.

The project would have a significant cumulative impact to each of the intersections listed below. The magnitude of the impacts below cannot possibly be mitigated by the nominal of LHR project contribution in TIF fees. The impacts will remain as significant unmitigated impacts.

- E. Vista Way/Gopher Canyon Road;
- SR-76/Old River Road/E. Vista Way;
- SR-76/Olive Hill Road/Camino Del Rey;
- SR-76/Pankey Road;
- Old Highway 395/West Lilac Road;
- I-15 SB Ramps/Gopher Canyon Road;
- I-15 NB Ramps/Gopher Canyon Road;
- Old Highway 395/E. Dulin Road;
- Miller Road/Valley Center Road;
- SR-76/Old Highway 395;
- I-15 SB Ramps/Old Highway 395; and
- I-15 SB Ramps/Old Highway 395.

The project would have a significant cumulative impact to each of the segments of the I-15 listed below.

- Between Riverside County Boundary and Old Highway 395;
- Between Old Highway 395 and SR-76;
- Between SR-76 and Old Highway;
- Between Old Highway 395 and Gopher Canyon Road;
- Between Gopher Canyon Road and Deer Springs Road;
- Between Deer Springs Road and Centre City Parkway;
- Between Centre City Parkway and El Norte Parkway; and
- Between El Norte Parkway and SR-78.

The LHR project proposes doing nothing whatsoever to mitigate its I-15 traffic impacts.

#### **LU-12.4 Planning for Compatibility:**

“Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, and LOS D or better may not be achieved.”

Please refer to our comments on LU-12.2 Maintenance of Adequate Services – Converting Rural Circulation Element 2.2 E to traffic signal controlled Urban Gridlock Environments is not compatible with General Plan Land Use design for the Adjacent Areas.

Table M-4 is included for reference:

**Table M-4 Road Segments Where Adding Travel Lanes is Not Justified**

Road	Classification	From	To
<b>State Highways<sup>a</sup></b>			
SR 67	4.1B Major Road with Intermittent Turn Lanes	Poway city limits	Scripps Poway Pkwy. (Lakeside)
	4.1A Major Road with Raised Median	Scripps Poway Pkwy. (Lakeside)	Sycamore Park Dr. (Lakeside)
	4.1A Major Road with Raised Median	Johnson Lake Rd. (Lakeside)	Posthill Rd. (Lakeside)
	4.1B Major Road with Intermittent Turn Lanes	11 <sup>th</sup> Street (Ramona)	Pine Street/SR-78 (Ramona)
SR-76/Pala Rd. <sup>b</sup>	4.1A: 4-Ln Major Road w/ Raised Median	Old Hwy 395 (Fallbrook)	I-15 SB Ramps (Fallbrook)
	2.1D Community Collector w/ Improvement Options	Pala Del Norte Rd. (Pala Pauma)	Sixth St (Pala Pauma)
Main Street/SR-78	4.2B: 4-Ln Boulevard w/ Intermittent Turn Lanes	9th St (Ramona)	Pine St (Ramona)
<b>County Mobility Element Roads</b>			
Alpine Blvd.	2.2A Light Collector w/ Raised Median	Boulder Rd. (Alpine)	Louise Dr. (Alpine)
Bancroft Dr.	2.2D Light Collector w/ Improvement Options	Troy St (Spring Valley)	SR-94 EB Ramps (Spring Valley)
Briarwood Rd.	2.1D Community Collector w/ Improvement Options	SR-54 WB Ramps (Sweetwater)	Robinwood Rd (Sweetwater)
Campo Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	Kenwood Dr (Valle de Oro)	Conrad Dr (Valle de Oro)
Central Ave.	2.2B Light Collector w/ Continuous Turn Lane	Sweetwater Rd. (Sweetwater)	Bonita Rd. (Sweetwater)
	2.2C Light Collector w/ Intermittent Turn Lanes	Bonita Rd. (Sweetwater)	Frisbee St. (Sweetwater)

**Table M-4 Road Segments Where Adding Travel Lanes is Not Justified**

Road	Classification	From	To
De Luz Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Dougherty St. (Fallbrook)	W. Mission Rd. (Fallbrook)
Deer Springs Rd.	4.1B Major Road w/ Intermittent Turn Lanes	I-15 NB Ramps (NC Metro)	N Centre City Pkwy (NC Metro)
Del Dios Hwy.	2.1D Community Collector w/ Improvement Options	El Camino Del Norte (San Dieguito)	Via Rancho Pkwy (North County Metro)
E. Mission Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	Live Oak Park Rd. (Fallbrook)	I-15 SB Ramps (Fallbrook)
El Apajo.	2.1A Community Collector w/ Raised Median	Villa De La Valle (San Dieguito)	Via De Santa Fe (San Dieguito)
El Camino del Norte	2.2F Light Collector w/ Reduced Shoulder	Aliso Canyon Rd. (San Dieguito)	Del Dios Hwy./Paseo Delicias (San Dieguito)
Fuerte Dr.	2.2E Light Collector	Bancroft Dr. (Valle de Oro)	Avacado Blvd. (Valle de Oro)
Jamacha Rd.	6.2 Prime Arterial	Campo Rd/SR-94 (Valle de Oro)	Fury Ln. (Valle de Oro)
	4.1B Major Road w/ Intermittent Turn Lanes	SR-125 SB Ramps (Spring Valley)	Sweetwater Rd (Spring Valley)
La Bajada/ La Granada	2.2F Light Collector w/ Reduced Shoulder	Rancho Santa Fe Rd. (San Dieguito)	Paseo Delicias (San Dieguito)
Lake Jennings Park Rd.	4.1B Major Road w/ Intermittent Turn Lanes	I-8 Business Route (Lakeside)	I-8 WB Off-Ramp (Lakeside)
Lilac Rd.	4.2B Boulevard w/ Intermittent Turn Lanes	New Road 19 (Valley Center)	Valley Center Rd. (Valley Center)
Linea del Cielo	2.2F Light Collector w/ Reduced Shoulder	El Camino Real (San Dieguito)	Rambla de las Flores (San Dieguito)
Los Coches Rd.	2.1D Community Collector w/ Improvement Options	Woodside Ave (Lakeside)	I-8 Business Route (Lakeside)
Lyons Valley Rd.	2.2B Light Collector w/ Continuous Turn Lane	Campo Rd. (Jamul)	Skyline Truck Trail (Jamul)
Maine Ave.	2.2E Light Collector	Mapleview St (Lakeside)	Woodside Ave (Lakeside)
Mapleview St.	4.1A Major Road w/ Raised Median	Maine Ave. (Lakeside)	Ashwood St (Lakeside)
Mountain Meadow Rd./ Mirar de Valle	2.1D Community Collector w/ Improvement Options	North Broadway (NC Metro)	New Road 19 (Valley Center)
New Road 19	4.2B Boulevard w/ Intermittent Turn Lanes	Mirar de Valle Road (Valley Center)	Lilac Road (Valley Center)
Old Hwy 395	2.1D Community Collector w/ Improvement Options	5th St. (Rainbow)	Interstate 15 NB ramp (Fallbrook)
Old Hwy 395	2.1A Community Collector w/ Raised Median	Interstate 15 SB ramp (Fallbrook)	Stewart Canyon Dr. (Fallbrook)

<b>Table M-4 Road Segments Where Adding Travel Lanes is Not Justified</b>			
<b>Road</b>	<b>Classification</b>	<b>From</b>	<b>To</b>
	2.1D Community Collector w/ Improvement Options	Pala Rd. (Fallbrook)	Dublin (W) Rd. (Fallbrook)
Paradise Valley Rd.	4.1B Major Road w/ Intermittent Turn Lanes	Elkelton Blvd (Spring Valley)	Sweetwater Rd (Spring Valley)
Paseo Delicias	2.2A Light Collector w/ Raised Median	Via De La Valle (San Dieguito)	El Camino Del Norte (San Dieguito)
Pomerado Rd.	4.1A Major Road w/ Raised Median	I-15 NB Ramps (County Islands)	Willow Creek Rd. (County Islands)
Rainbow Valley Blvd. West	2.2D Light Collector	I-15 NB Ramps (Rainbow)	Old Hwy. 395 (Rainbow)
Rancho Santa Fe Road	2.2F Light Collector w/ Reduced Shoulder	Encinitas city limits	La Bajada (San Dieguito)
San Dieguito Rd.	2.1A Community Collector w/ Raised Median	El Apejo Rd. (San Dieguito)	San Diego city limits
7 <sup>th</sup> St.	2.2E Light Collector	Elm St. (Ramona)	A St. (Ramona)
		Main St. (Ramona)	D St. (Ramona)
Valley Center Rd.	4.2A Boulevard w/ Raised Median	Miller Rd (Valley Center)	Indian Creek Rd (Valley Center)
Via de la Valle	2.1B Community Collector w/ Continuous Turn Lane	San Diego city limits (San Dieguito)	Las Planideras (San Dieguito)
	2.1E Community Collector	Las Planideras (San Dieguito)	Paseo Delicias (San Dieguito)
West Willows Rd.	2.2E Light Collector	Alpine Blvd (Alpine)	Viejas Grade Rd. (Alpine)
Wildcat Canyon Rd.	2.1D Community Collector w/ Improvement Options	Willow Rd. (Lakeside)	Barona Casino (Ramona)
Woods Valley Rd.	2.2C Light Collector w/ Intermittent Turn Lanes	Oakmont Rd (Valley Center)	Karibu Ln. (Valley Center)

## Mobility Element Goals

### M 1.2 - Interconnected Road Network:

“Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.”

The LHR project is totally inconsistent with this policy. The proposed LHR Project is requesting to increase the automotive traffic 15 times by adding traffic to the only two existing Public Roads, and adding no additional access roads out of the area. This is a significant unmitigated safety issue.

### **M - 2.1 Level of Service Criteria:**

“Require development projects to provide associated road improvements necessary to achieve a level of service of “D” or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.”

The project is adding 20,000 additional trips greater than the General Plan approved land use. This additional traffic will be added to several roadways that were approved to operate at LOS “E”/”F” without requiring mitigation of the projects additional traffic. The impact of adding additional traffic to the roadways that are operating at LOS “E”/”F” beyond the level of service reported with the General Plan needs clarification. Can additional traffic from the proposed General Plan Amendments be allowed to further degrade the approved LOS “E”/”F” designations?

### **M-3.3 Multiple Ingress and Egress:**

“Require development to provide multiple ingress/egress routes in conformance with State law and local regulations.”

The LHR project is inconsistent with this policy. It adds 5,185 humans to a rural area and provides no additional secondary access roads. Mountain Ridge (Private Road) is identified as a secondary access road. Accretive seeks multiple road standard exceptions that reduce road design speed, waiver compliance with fire code standards, and create safety issues.

### **M-4.2 Interconnected Local Roads:**

“Provide an interconnected and appropriately scaled local public road network in Village and Rural Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.”

The development of the project proposes numerous design exceptions to reduce the width design and safety aspects of the surrounding roadways. Discussions of Design Exceptions are presented in a separate memorandum.

#### **M - 4.4 Accommodate Emergency Vehicles:**

“Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.”

The LHR project is inconsistent with this policy. It adds 5,185 humans to a rural area and provides no additional secondary access roads. Mountain Ridge (Private Road) is identified as a secondary access road. Accretive seeks multiple road standard exceptions that reduce road design speed, waiver compliance with fire code standards, and create safety issues.

#### **M - 4.5 Context Sensitive Road Design:**

“Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.”

The LHR Project will create significant and unmitigatable environmental impacts to West Lilac and Circle R Public Roads and Covey Lane, Rodriguez, and Mountain Ridge Private Roads by creating unmitigated hazards to wildlife in this Rural and Semi-Rural Area.

#### **M-6.1 Designated Truck Routes:**

“Minimize heavy truck traffic (generally more than 33,000 pounds and mostly used for long-haul purposes) near schools and within Villages and Residential Neighborhoods by designating official truck routes, establishing incompatible weight limits on roads unintended for frequent truck traffic, and carefully locating truck-intensive land uses.”

The development of the LHR project non-residential uses will increase trucks within the project and will add truck traffic to the offsite roadway system. Due to the number of Design Exceptions requested the adequacy of the on-site and off-site roadways needs to be assessed for their ability to handle truck traffic.

## **M - 9.1 Transportation Systems Management:**

“Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.”

The roadway improvements proposed by the project are not designed to adequately serve pedestrian and bicycle operations. The proposed improvements also need to be reassessed to provide left turn lanes at intersection onsite and offsite.

## **Safety Element Goals**

### **S-14.1 Vehicular Access to Development:**

“Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.”

The LHR project is inconsistent with this policy. It adds 5,185 humans to a rural area and provides no additional secondary access roads. Mountain Ridge (Private Road) is identified as a secondary access road. Accretive seeks multiple road standard exceptions that reduce road design speed, waiver compliance with fire code standards, and create safety issues

In addition, the LHR project has not provided a feasible solution to provide 5 minute emergency response time for fire and emergency medical services for the proposed LHR project area.

Sincerely,

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July 31, 2013

To: Mark Slovick, Project Manager  
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**Subject:** DEIR Public Comments Regarding Water Quality Standards and Related Requirements for the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovik:

I have reviewed the Specific Plan, DEIR and supporting technical studies for the proposed Accretive Lilac Hills Ranch 1746 Dwelling unit + 90,000 sq. ft. Commercial + School + Senior Congregate Care Facility, and have the following comments and questions regarding Water Quality impacts and mitigation measures.

### **Water Quality Standards and Requirements**

The DEIR concludes under **Issue 1: Water Quality Standards and Requirements** in Chapter 3.0 "Environmental Effects Found Not to be Significant" as follows:

"Through these design features, including the use of permeable pavers, the project would not result in the violation of any water quality standards or waste discharge requirements. Impacts associated with this issue would be **less than significant.**"

We strongly disagree with this finding and conclude that there is **high likelihood of potentially significant and unmitigable impacts.**

### **Offsite Pipeline Routes/Pipeline Right of Way**

I have performed an analysis of the preferred route (Alternate 3) for the offsite sewer and recycled water pipelines. Accretive Investments **does not have legal** right-of-way easement rights to transport recycled water or sewer pipelines across the route depicted in Figure 3-4 "*Offsite Sewer Collection System.*"

Please see attachment "A" hereto, a July 8, 2013 Valley Center Municipal Water District (VCMWD) to M. Jackson letter **confirming that VCMWD has inadequate legal easements** along the route analyzed (Alternate 3).

In light of this fundamental problem, further due diligence is necessary to determine first of all whether the project can actually be built and secondly whether it will be able to utilize even the most basic mitigation measures that would ordinarily be required.

The DEIR should answer the following questions:

1. What verifiable legal rights of way, if any, do VCMWD and Accretive have for any of the proposed sewer and recycled water transport routes indicated?  
Information Required – Please Geo locate on a map **all** of the easement documents across a map of Assessor Parcel Numbers tracing **all offsite** routes for sewer and recycled water pipelines identified in Figures 3-2 and 3-4.
2. If it is confirmed that VCMWD and/or Accretive do not have full legal right-of-way for the proposed pipelines, how does Accretive intend to acquire rights? Please note the VCMWD response in Attachment A with respect to the use of Eminent Domain. Also, there are no property owners that we are aware of who are willing to grant the needed easement rights.
3. Background – nearly all of the VCMWD easements cited by Landmark Engineering for the project are 20 foot easements. Question – How does Accretive propose to co-locate Sewer, Water, and Recycled Water pipelines within the 20 foot easement and comply with all codes and regulations?

#### Use of the existing Lower Moosa Water Reclamation Facility (LMWRF)

The study assesses potential use of the LMRWF for a series of alternatives that range from interim processing of all sewage during initial phases of the project, to installing a scalping plant on-site within the Lilac Hills Ranch Subdivision and transporting sludge to LMRWF for solids treatment.

The LMRWF entered operation service in 1974 and provides disinfected secondary treatment of reclaimed water only. Water treated to this standard can be applied to no other beneficial use other than percolation back into groundwater aquifers.

In 1996 the County of San Diego approved a Major Use Permit and the Regional Water Quality Control Board (RWQCB) approved a permit to double LMWRF capacity to 1.0 Million Gallons/Day (MGD) of influent. This capacity has not been added, nor to the best of our understanding have final permits from other Governmental Agencies been approved to implement this expansion.

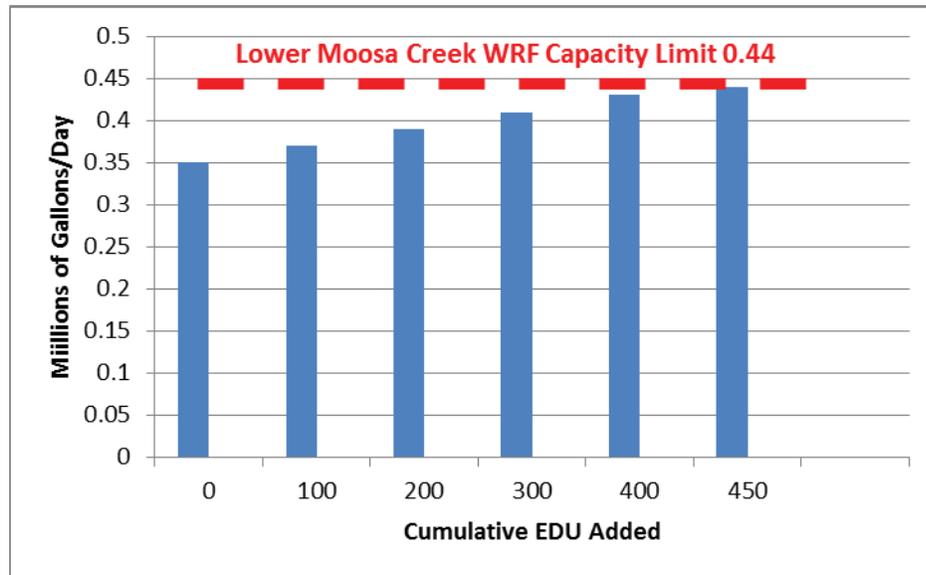
Question 4). Please list all permits required by agency and agency contact information for all permits not currently granted to VCMWD that enable expansion of the LMWRF from 0.5 MGD to 1.0 MGD capacity. It appears in fact that expansion will not occur for a variety of reasons. Please explain.

If LMWRF were to be expanded, it is likely that State and Regional Agencies will require upgrading the entire LMWRF to Title 22 tertiary water treatment standards so that the recycled water could be beneficially used for specific limited uses. These uses would need to be compliant with Title 22 level water and could not further degrade the water quality of the San Luis Rey Basin 903 watershed, either for biological or Total Dissolved Solids (TDS) point or non-point sources.

The current capacity of LMRWF is 0.5 MGD of sewage influent treatment and is presently at 0.35 MGD average reclaimed secondary treated water.

The present ground water percolation pond capacity is 0.44 MGD.

The present capacity of LMWRF allows addition of a maximum of 450 Equivalent Dwelling Units (EDU's) until secondary percolation ponds are at full permit capacity. See Graph below:



Question 5): It is our understanding that the Regional Water Quality Control Board (RWQCB) may not allow an expansion to the current 0.44 MGD limit on the percolation ponds. Is this correct? In your response, please provide details of current Basin and Sub Basin capacity, present Surface and Groundwater Quality (detail of TDS by element, heavy metals, and biological organisms) for relevant Basins and Sub Basins. Please provide RWQCB's detailed analysis of concerns on any proposed expansion of the LMWRF percolation pond capacity for additional disposal of secondary disinfected recycled water beyond the current 0.44 MGD cap.

Question 6) Assuming the 0.44 MGD percolation pond limit, only 450 maximum EDU of influent can be added to LMWRF. Question: What is the current number of EDU's of outstanding applications for land development permits + EDU's from permits granted but not yet built from the existing LMWRF service area? For example Castle Creek Condos, Welk Resorts, and Champagne RV Park are current processing discretionary permits for the addition of 260 EDU within the current LMWRF service area. Please tabulate all other outstanding EDU's from pending discretionary permits and list the total. This analysis is also appropriate under the cumulative impacts section of the DEIR.

Question 7).What is the estimated schedule duration (in months) to obtain permits, design, construct, and operationally check out the upgraded capacity and water quality of LMWRF at 1.0 MGD with Title 22 tertiary treatment quality level for the entire LMWRF facility? To be realistic, please include a range of durations with a 75% confidence level using a "Risk +" (a standard Critical Path Method software package) Monte Carlo simulation.

Question 8) Does VCMWD own enough real estate at the current LMWRF site to host 1.0 MGD and Title 22 tertiary treatment quality level capability? If not, can VCMWD obtain adequate land without use of Eminent Domain?

The Maturity of Project Waste Water Treatment Design is at Concept Level at a time when it

should be at Critical Design Review (review of point design with an assessment of related Environmental Impacts)

Question 9+). Please refer to Attachment B – VCMWD and Accretive Investments Inc. Pre Development Agreement. Question: As of July 8, 2013 the VCMWD Board has approved this agreement. This agreement lists a set of phased steps that result in a point design solution for the Accretive Lilac Hills Ranch Water and Waste Water solutions. Has Accretive approved this agreement and what are the consequences under the agreement if Accretive does not have sufficient easement rights? What is the current status of the point design solution?

Required Beneficial Uses of Recycled Water within the Subdivision’s Boundaries

It is a policy of the VCMWD for a Major Subdivision to beneficially use the treated recycled water from sewage legally and beneficially within the Subdivision boundaries to offset the use of imported potable water.

Question 10). To what specific Title 22 Standards will this Project’s waste water be treated? “We will tell you at a later phase” is not an acceptable answer. Please answer the question directly and unambiguously, to allow Environmental Impact to be measured and feasible mitigation measures to be identified.

Question 11). What is the basis of the three set points in Table 5-1? Please identify these areas and geo-locate them on a map.

The proposed Project urban density of housing and commercial uses yields at most 104 acres that are identified as total non–developed land within the total 608 Project acreage. Of these 104 acres, some are in Clean Water Act Section 404 wetlands and seasonal stream beds. Table 5-1 below from the Waste Water Management Alternatives Study arbitrarily distributes 300 acre feet over three hypothetical cases: 99.9 acres, 85.7 acres, and 74.9 acres at rates of 3, 3.5, and 4 AFY/acre. There is no substantiation for these set points. Table 5-1 from Accretive’s Waste Water Management of Alternatives Study is below:

<b>Irrigation Application Rates</b>	<b>Lilac Hills Ranch Acreage (based on 300 AFY)</b>	<b>Additional Acreage (based on 57 AFY)</b>
at 3 feet per acre	99.9 acres	19.1 acres
at 3.5 feet per acre	85.7 acres	16.4 acres
at 4 feet per acre	74.9 acres	14.3 acres

For reference purposes, 3.25 AFY/acre is the average rainfall that Seattle, Washington receives on an annual basis. Normal rainfall for this area of San Diego is 1.25 AFY/acre. Added together, 4.5 AFY/acre is proposed as being reclaimed on fewer than 100 acres.

Is the project proposing growing rice on all land not covered in concrete (or permeable pavers)?

Is the Project disposing of recycled water with point and non-point source additives into the Section 404 waters?

Question 12). Please Geo locate on a map specific uses for recycled water by use type and annual recycled water usage volume the total of 300 AFY used on the entire 608 acre project. If agricultural uses are indicated, specify the crop and the monthly irrigation cycles.

Question 13). Please Geo locate on a map specific uses for recycled water by use type and annual recycled water usage volume the total of 57 AFY used **offsite** from the project. If agricultural, park land, or other recreational uses are indicated, specify the use, the monthly irrigation cycles, and if applicable, the crop. Since this recycled water is property of VCMWD and not Accretive, please indicate whether this proposed offsite use is acceptable to VCMWD.

Question 14). Effective Rainwater Harvesting on Residential Units relies on fastidious and universal maintenance of rain gutter debris. Please re-run a total of two sensitivity calculations as part of the Hydro Modification Analyses with a 50% hard failure of rainwater harvesting and storage on residential units due to lack of scheduled maintenance (352-176 = 176 EDU participating in rainwater harvesting and storage) and a second case of 100% hard failure of rainwater harvesting and storage on residential units due to lack of scheduled maintenance (0 EDU participating in rainwater harvesting and storage).

Question 15). The Hydro Modification Study results assume 100% non-hardscape use of potential landscape areas of residential lots besides the house slab, diminutive patio and driveway. Please run two excursions of 15% and 30% conversion of "landscaped permeable residential landscape areas" to impermeable hardscape. There are a variety of likely real life scenarios that will generate this condition that include storage sheds, additional decking and walkways, etc.

Question 16). Please cumulatively analyze the results of Questions 15 and 16 together.

#### Reliance on Permeable Pavers in Streets Design and Construction

The Hydro Modification Plan states that the baseline state for analysis is to have 23 acres (1.002 Million square feet) of Private Roads paved with permeable pavers to permit this dense urban development 608 acre to percolate into the soils. This equates to nearly 4% of the total area of the Project covered with permeable paver surface on internal circulation roads.

The San Diego Consolidated Fire Code together with its reference to Acceptable Road Surfaces is contained in Attachment C. There is no specific mention of concrete pavers (either permeable or impermeable) being an acceptable road surface in the Consolidate Fire Code. However, there is a requirement that all road surfaces bear the weight of a 75,000 Fire Engine without road failure.

Question 17) What specific permeable paver product was Accretive planning to use for this Project? On what other San Diego County projects has this material been used in similar (1 million sq. ft. or larger) roads designed to Public Road standards? Is the material acceptable to the Department of Public Works for Public Road Standard usage as well as being compliant with the Consolidated Fire Code?

Question 18+). The notional usage of permeable pavers on streets designed to Public Standards depicts a 25 foot wide paved surface with 6 inches of aggregate in two courses with 24 inches

of No. 2 Stone underlayment for a total of 30 inches of aggregate and rock base. The 23 acres of permeable paving equates to approximately 40,075 linear feet of 25 foot wide paved road surface. The requirement for 30 inches of Road Base equates to approximately 92,766 cubic yards of aggregate and stone. Is this calculation correct? The 92,766 cubic yards is over 2% of the total project grading estimate of 4,000,000 cubic yards. The total project commits to no import or export of fill material. How is this possible? Will there be an on-site rock crushing plant with all of its Environmental Impact crushing on-site mined rock? What will be the air quality impacts associated with the delivery and application of these quantities of materials?

Question 19). The Schematics in the Hydro modification Study did not display in the PDF file that the County posted on the web site. Please provide legible, readable copies of these important figures and extend the Public Review period for another 45 days after release of this information to compensate for this deficiency.

Question 20). The County's Consultant uses the term Low Impact Development (LID) frequently in the Hydro Modification Study. How is this DENSE URBAN development in sensitive surface and ground water basins LOW IMPACT?

Overall, the ratio of impervious soil to undisturbed soils and natural drainage is grossly low. Using the unusually expensive technique of very large scale usage of permeable pavers, Accretive has put forward an unpersuasive and quite marginal "paper" argument that only appears to achieve ANALYTICAL COMPLIANCE.

Accretive's Hydro Modification Design relies on fastidious and grossly overly optimistic maintenance of rainwater harvesting and storage practices by residents as well as naive projections on residents' post construction expansion of hardscape footprints on residential lots.

As the requested sensitivity analyses will show, this project will have major significant Environmental impacts to surface and ground water quality and quantities.

#### Storm Water Management Plans (SWMP)

Accretive's SWMP for the Tentative Master Map and Implementing Tentative Map contain conflicting information and are inconsistent with key values in the Hydro Modification Management Plan.

#### Storm Water Management Plan for Master Tentative Map (entire 608 acre Project)

Questions 21 – 23) Please refer to Attachment D – Please answer each of the Questions on Storm Water Management Plan for Master Tentative Map (total Project).

Question 24). In addition to Questions 21-23, it should be noted that the level of detail contained in the Storm Water Management Plan for Master Tentative Map is grossly inadequate to measure Environmental Impact. Please provide a current, accurate and complete study that comprehensively provides an accurate and realistic Storm Water Management design for the entire 608 acre project and quantitatively analyzes compliance with all Storm water Management laws and regulations. This follow-up work is necessary because of the demonstrated incompleteness, inaccuracy and naive assertions put forward to date by the applicant. Deferral of further due diligence would be tantamount to failing to identify very significant environment impacts.

Storm Water Management Plan for Implementing Tentative Map (First Phase 114.9 Acres and 352 EDU)

Questions 25 – 27) Please refer to Attachment E – Please answer each of the Questions on Storm Water Management Plan for Master Tentative Map (total Project). Also, please explain if the Applicant and/or the County consider this project a “Priority Project” under MS-4 Policy and what the reasons are.

Question 28). Please provide a current, accurate, and complete estimate of impervious surfaces that will be created by the full build out of the entire proposed 608 acre project by element: Roof tops, housing and commercial pads, impervious streets, parking lots, residential hardscape, commercial hardscape, etc. Please geo locate these areas on a Project Map.

Accretive cites General Plan Goal 5.2 – Conservation of Open Space – Minimize Impervious Surfaces as a rationale for impact reduction of their proposed project. The full text of Goal COS 5.2 is below:

**COS-5.2 Minimizing Impervious Surfaces.** Require development to minimize the use of impervious surfaces.

It is tortured logic to argue that taking greenfield agricultural and semi rural estate land and introducing a dense urban environment that develops 504 of the 608 acres, adding 83 acres of road and 68 acres of manufactured slopes is consistent with this policy.

On the contrary, it is inconsistent with this Goal. Please discuss this inconsistency

### **Summary**

There are multiple and major questions that need to be addressed as a result of the deficiencies of the DEIR. It is respectfully submitted that the DEIR be revised and then re-noticed for public comment. Thereafter there can be an orderly and focused comment period leading up to the issuance of a final EIR.

There are simply too many changes and additions to be made to the existing document to try and “fix” the problems through responses to comments.

Sincerely,

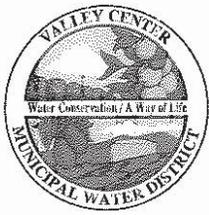
Mark Jackson  
9550 Covey Lane  
Escondido, CA 92026  
760-731-7327  
jacksonmark92026@gmail.com

Attachment A – July 8, 2013 VCMWD to Jackson letter  
Attachment B - VCMWD and Accretive Investments Inc. Pre-Development Agreement

Attachment C- San Diego County Consolidated Fire Code Acceptable Road Surfaces

Attachment D – Questions on Storm Water Management Plan for Master Tentative Map (total Project)

Attachment E – Questions on Storm Water Management Plan for Implementing Tentative Map (first phase – 114.9 acres/352 EDU)



# VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

Board of Directors  
 Gary A. Broomell  
 President  
 Robert A. Polito  
 Vice President  
 Merle J. Aleshire  
 Director  
 Charles W. Stone, Jr.  
 Director  
 Randy D. Haskell  
 Director

July 8, 2013  
 (Revised from original letter dated July 2, 2013)

Mark Jackson  
 9550 Covey Lane  
 Escondido, CA 92026

Dear Mr. Jackson;

We enjoyed meeting with you on Friday, June 28, 2013 concerning the Lilac Hills Ranch Project. During our meeting, you asked a number of questions to which we have provided the answers as follows:

**Question:** *“The Developer has indicated his intent to run sewer force mains on three offsite routes for which I believe the District does not have easement rights to place sewer lines in. The information and my assessment are below.*

Route	APN's	Easement Doc.	Dimensions	VCMWD right
Covey Lane Parcels	128-290-76 and 128-290-77	1968-155521	20' Easement	Water Only

Route	APN's	Easement Doc.	Dimensions	VCMWD right
West Side of Mountain Ridge – SBDN boundary to Circle R	Various North approx. 1320'	1965-214916	20' Easement	Water Only
	Various South approx. 1260'	1965-206816	20' Easement	Water Only

Route	APN's	Easement Doc.	Dimensions	VCMWD right
East Side of Mountain Ridge – SBDN boundary to Circle R	Various North approx. 1320'	1992-0253368	20' Easement	Water and Sewer
	Various South approx. 1260'	1965-214912	20' Easement	Water Only

*Am I correct?”*

**Answer:** VCMWD does not presently have sewer or recycled water easement rights across the Covey Lane parcels or the West side of Mountain Ridge private road from the Lilac Hills Subdivision Boundary to the Circle R Public Road.

On the East side of Mountain Ridge private road, VCMWD lacks sewer easement rights for the southern approx. 1260 feet to connect to Circle R public road.

In order for Accretive to use these routes for sewer and/or recycled water routes, additional rights will need to be secured from existing property owners for the selected route.

**Question: (Added for revised letter of 7/8/13)** *“Since the Developer does not have easement rights for sewer on the Mountain Ridge route indicated in their Waste Water Management Alternative studies, does VCMWD have powers to acquire the rights via Eminent Domain?”*

**Answer: (Added for revised letter of 7/8/13)** VCMWD does have the Power of Eminent Domain and has used it on limited occasions for its own projects. California law does provide that at the governing board’s discretion a public agency can acquire easements or property by eminent domain for facilities that the agency has required on behalf of private developers at the full expense of the developer. Using eminent domain to acquire property or easements has an intrinsically controversial nature which would certainly be amplified by the prospect of using the easement being acquired on behalf of a private interest. It is likely that the Board would require the developer to clearly document and demonstrate that it has made a significant effort to acquire the required easement through private means and/or that the developer has explored all reasonable alternatives or alternative routes before it would even entertain using its eminent domain powers to acquire these rights of way. ***Ultimately it is not mandatory for the Board to use its powers of eminent domain to acquire easements for private development interests.***

**Question:** *“What are the Pipeline horizontal separation requirements for placement of Potable Water, Recycled Water, and Sewer lines?”*

**Answer:** Typically, sewer must be separated by 10 feet from a potable water line. Sewer and Recycled Water must be separated from each other by 5 horizontal feet to allow access for pipeline maintenance and repair. Separation requirements for water/sewer lines may be decreased to 4-feet using special construction materials and placing the sewer line below the waterline. In extremely rare cases, the Department of Health may allow new sewer lines 1-foot from potable waterlines. However, due to operational and maintenance access needs, VCMWD would only allow less than 5-feet of separation between potable/non-potable lines if no other feasible alternative were available.

By using special construction materials and with special approval from the Department of Health Services, VCMWD understands that sewer and recycled water may be placed within the same trench using special construction materials and placement of the lines at different depths. VCMWD would review the separation of the non-potable lines in terms of access for pipeline maintenance and repair. Please refer to the attached

Figures 1 and 2 of the Department of Health Services Guidance Memo dated April 14, 2003 for more information.

**Question:** *"What is the wet weather recycled water retention on-site storage requirement?"*

**Answer:** Typically, 84 days of estimated average 24 hour recycled water generation storage is required. This can vary depending upon the ratio of irrigation area to recycled water produced. The final determination is made by the San Diego Regional Water Quality Control Board.

**Question:** *"I understand that VCMWD and Accretive have entered into a phased agreement that defines the steps to incrementally evaluate Water and Wastewater services. Could a copy be provided?"*

**Answer:** The agreement, which was approved by our Board, but yet unsigned by Accretive, is attached for your review.

Subsequent to our meeting on Friday, June 28, 2013, you posed additional questions via an e-mail sent later that day. Those questions and our responses are as follows:

**Question:** *"Did I understand you correctly that all recycled water (tertiary treated to Title 22 standards) generated by the Development must be used on-site for appropriate purposes (park and common area irrigation, agricultural irrigation, etc.)? Key concept being 'on-site'. Could Accretive sell the recycled water to Welk Resorts and Castle Creek Country Club for golf course irrigation? Or must they use the water within their 608 acre project?"*

**Answer:** The project will be required to provide secure, long-term suitable beneficial use areas for the recycled water to off-set potable use within the project limits. Typically these areas are properties that may utilize recycled water on a long-term basis in place of potable water such as parks, agricultural land, and landscaped areas. The beneficial use areas may be within or outside the limits of the project. Accretive may not sell recycled water; VCMWD will own all recycled water generated from the project and will own and operate the recycled water transmission and distribution systems. Prospective recycled water users include on-site parks, landscaping, and agricultural areas and off-site agricultural and landscaped areas fronting the recycled lines.

**Question:** *"Could you please provide contact information for the appropriate individual at the San Diego Regional Water Quality Board to discuss Lilac Hills Ranch water quality issues?"*

**Answer:** The RWQCB contact is as follows:

**Fisayo Osibodu  
WRC Engineer  
Southern California Regional Water Quality Control Board  
San Diego Region  
(858) 637-5594**

If you have additional questions or require additional information, please feel free to contact us at your earliest convenience.

Sincerely;

A handwritten signature in black ink, appearing to read "Dennis Williams". The signature is fluid and cursive, with a large initial "D" and "W".

Dennis Williams,  
Project Manager/Deputy Eng. Dept. Director

Attachments

*(Please see attachments sent with original letter dated July 2, 2013)*

**PRE-DEVELOPEMENT AGREEMENT BETWEEN THE  
VALLEY CENTER MUNICIPAL WATER DISTRICT  
AND ACCRETIVE INVESTMENTS, INC.**

This agreement is made and entered into as of \_\_\_\_\_, 2013 by and between the VALLEY CENTER MUNICIPAL WATER DISTRICT (hereinafter referred to as the "VCMWD"), a public agency operating under the Municipal Water District Law of 1911, Water Code § 71000 et seq., and ACCRETIVE INVESTMENTS, INC. (hereinafter referred to as "Accretive"). VCMWD and Accretive are referred to collectively as "Parties". This agreement replaces the previous Pre-Development Agreement by and between the parties dated October 15, 2012.

**AGREEMENT**

NOW, THEREFORE, IT IS AGREED AS FOLLOWS:

- A. Accretive manages entities that either own or have options to purchase 608 acres of land within the jurisdictional boundaries of VCMWD described in Exhibit "A," which is attached hereto and by reference made a part hereof.
- B. Accretive proposes to develop the land described in Exhibit "A" as a mixed use pedestrian oriented community entitled Lilac Hills Ranch Community ("Proposed Development"), as further described in Exhibit "B." Accretive intends to obtain VCMWD approval of the required planning, design and construction documents required to provide a water, wastewater and recycled water system to serve the Proposed Development. In addition to requiring various land use approvals from the County of San Diego, the Proposed Development requires a Water Supply Assessment and Verification Report and Waste Discharge Modifications related to the water, wastewater and recycled water system to be provided by VCMWD, which necessitate VCMWD staff review and approval by VCMWD's Board of Directors ("Board of Directors").
- C. Accretive understands and agrees that the processing of the Proposed Development shall be subject to rules, regulations, ordinances, standards and specifications, as established by the Board of Directors of the Valley Center Municipal Water District with respect to those matters within its jurisdiction.
- D. The Parties understand that this "Pre-Development Agreement" is meant to set forth a general understanding between the Parties as provided herein and further described in the attached Exhibit "C" – Conditions of Preliminary Conceptual Approval – Lilac Hills Ranch. These conditions will be subject to further refinement and clarification as more details are developed for each development phase.
- E. The conditions for the review and approval of the water, wastewater and recycled water system that is directly needed to serve the Proposed Development (said system is referred to herein as the "Proposal") are generally as follows:

1. Accretive shall pay all costs and fees directly associated with the Proposal, including but not limited to reimbursing VCMWD for actual expenses incurred by VCMWD in processing the Proposal application, filing fees, staff time, and any changes in such processing / filing fee schedules approved by the Board of Directors in accordance with the law, that may occur during the processing of the Proposal by VCMWD. The Parties acknowledge that consultants and other professionals may be need in the processing and review of the Proposal and that the Parties will negotiate the costs and other related matters associated with consultants when and if required.
2. The Parties acknowledge that the Proposed Development is within the service area boundary of VCMWD. Further, VCMWD acknowledges that it has the authority to supply water, wastewater and recycled water service to the Proposed Development in accordance with its policies, and regulations adopted by the Board of Directors in accordance with and as allowed by state law. Accretive agrees to comply with such policies, and regulations.
3. VCMWD shall facilitate all aspects of the planning, environmental evaluation, design, and construction of any new or expanded facilities that may be needed to solely service the Proposal, in the manner proscribed in the various related polices, and regulations adopted by the Board of Directors in accordance with and as allowed by state law.
4. The Parties acknowledge that a facility plan for the Proposed Development along with other related documents and agreements may be required for the Proposal. The Parties agree to diligently cooperate in the preparation of such documents as needed for the Proposed Development.
5. Accretive agrees to coordinate with and assist VCMWD on all documents, studies, and plans for the Proposal, and other requirements related to said documents that may be imposed by or required by the State Department of Water Resources, Regional Water Quality Control Board, County of San Diego, San Diego County Water Authority, Metropolitan Water District or other agency having jurisdiction concerning the Proposal.
7. Accretive shall, at its own expense and with counsel selected by VCMWD and Accretive, fully defend, indemnify and hold harmless VCMWD, its officials, officers, employees and agents (collectively "Indemnified Parties") from and against any and all claims, suits, causes of action, fines, penalties, proceedings, damages, injuries or losses of any kind, including attorneys' fees (collectively "Liabilities") arising out of or in any way related to this Agreement, the Water Supply Assessment and Verification Report, California Environmental Quality Act certifications or any other actions or matters related to the Proposed Development or the Proposal. Accretive' s indemnification obligation shall include, without limitation, actions to attack, review, set aside, void or annul any approval by VCMWD of this Agreement, the Water Supply Assessment, CEQA documents, or any other discretionary approvals, actions or matters related to the Proposed Development or the Proposal or in furtherance thereof. VCMWD shall promptly notify Accretive of any such claim, action or proceeding and shall cooperate fully in the defense of such claim, action or proceeding. In the event Accretive

determines it may not be in its best interest to proceed with the litigation or to preserve such approvals, VCMWD agrees to reasonably consider Accretive's concerns in determining whether to proceed with such legal action. Accretive hereby waives any potential claim it might otherwise assert against VCMWD for any suspension actions relating to the Water Supply Assessment and Verification Report, CEQA documents, or any actions or matters related thereto or in furtherance thereof made in good faith, resulting from the carrying out of this Indemnification Agreement. Accretive's obligations under this Section shall not be limited or otherwise restricted or confined by the presence or absence of any policy of insurance or self-insurance held by VCMWD or Accretive.

- F. Laws, Venue, and Attorneys' Fees. This agreement shall be interpreted in accordance with the laws of the State of California. If any action is brought to interpret or enforce any term of this agreement, the action shall be brought in a state or federal court situated in the County of San Diego, State of California. In the event of any such litigation between the parties, the prevailing party shall be entitled to recover all reasonable costs incurred, including reasonable attorney's fees, as determined by the court.

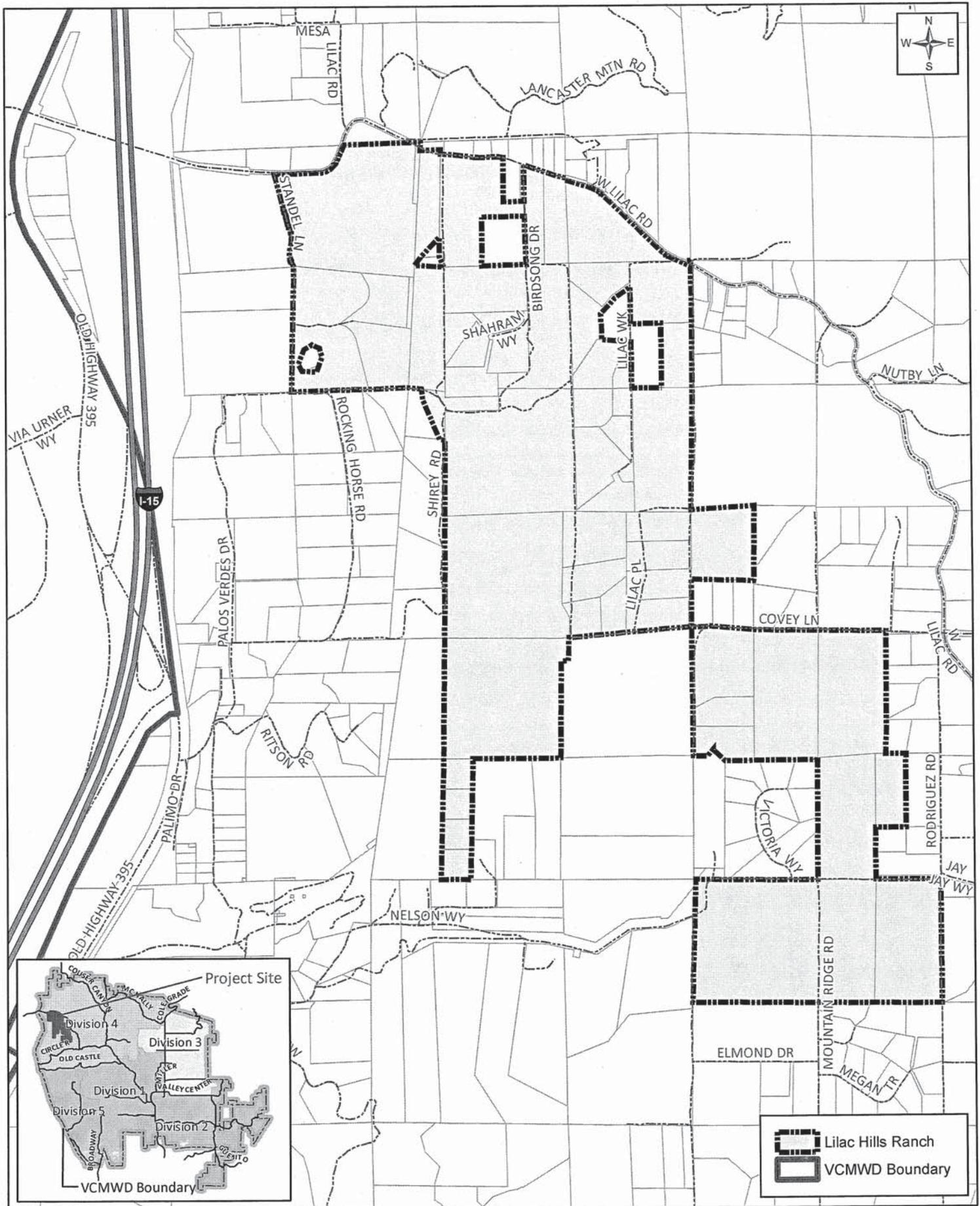
NOW IN WITNESS WHEREOF, the parties have executed this agreement as of the date first written above.

VALLEY CENTER MUNICIPAL WATER DISTRICT

\_\_\_\_\_  
Gary Arant, General Manager

ACCRETIVE INVESTMENTS, INC.

\_\_\_\_\_  
R. Randy Goodson, CEO



# EXHIBIT A

## Lilac Hills Ranch

## Exhibit A

### Lilac Hills Ranch Assessor Parcel Numbers

<u>No.</u>	<u>APN</u>	<u>No.</u>	<u>APN</u>
1	127-072-20	31	128-290-72
2	127-072-14	32	128-290-07
3	127-072-38	33	128-290-51
4	127-072-46	34	128-290-09
5	127-072-47	35	128-290-10
6	127-072-41	36	128-290-11
7	127-072-40	37	128-290-58
8	128-440-01	38	128-290-54
9	128-280-42	39	128-290-59
10	128-280-46	40	128-290-60
11	128-440-21	41	128-290-61
12	128-440-20	42	128-290-55
13	128-440-17	43	128-290-56
14	128-440-18	44	128-290-57
15	128-440-19	45	128-290-75
16	128-440-03	46	129-010-62
17	128-440-22	47	129-010-76
18	128-440-14	48	129-010-75
19	128-440-15	49	129-010-73
20	128-440-06	50	129-010-74
21	128-440-05	51	129-010-69
22	128-440-23	52	129-010-70
23	128-440-02	53	129-010-71
24	128-280-27	54	129-010-72
25	128-280-10	55	129-010-68
26	128-280-37	56	129-011-15
27	128-290-74	57	129-011-16
28	128-290-69	58	129-300-09
29	128-290-70	59	129-300-10
30	128-290-71		

## EXHIBIT "B"

### Project Description

The Lilac Hills Ranch community (also referred herein as "Community") proposes the development of a 608-acre mixed use pedestrian oriented sustainable community within the unincorporated area of San Diego County designed to meet the environmental standards of the LEED 2009-ND or an equivalent program. A portion of the land is within the Bonsall Community Planning Area and a portion is within the Valley Center Community Planning Area as shown in Figure 1 - Regional Location Map. The proposed Specific Plan includes a residential component consisting of 1,746 dwelling units which equates to an overall density of 2.9 dwelling units per acre (du/ac) over the entire 608-acres. The planning areas with higher densities are located in the Village Center and in the Phase 3 Neighborhood Center. The Village Center and two smaller Neighborhood Centers also permit 75,000 square feet of retail commercial-mixed uses, and Phases 4 and 5 include a 172-acre Senior Citizen Neighborhood component which includes: market rate, age restricted residential housing (a total of 468 dwelling units included in the 1,746 dwelling units above), and Group Residential and Congregate Care living facilities (both non-residential dwelling units). The Community will retain and promote agriculture uses in the project's open space system. Existing agricultural uses in the biological open space will be allowed to continue, and some existing and new agricultural uses, both on an interim and permanent basis will also be permitted in certain other development areas. The Community also includes an active park system with a minimum of 12 public and private parks, public trails, and a school site. Also, proposed within the Community are a Recycling Facility; a wastewater treatment and reclamation facility; and other supporting infrastructure.

Discretionary approvals submitted concurrently with the Specific Plan include a General Plan Amendment, Rezone, two Tentative Maps (which include the Vacation of two Open Space easements), a Site Plan for the Implementing Tentative Map, and a Major Use Permit for the wastewater treatment and reclamation facility.

**Residential Component:** This Specific Plan proposes a residential community with a maximum of 1,746 homes as shown in Figure 9 - Proposed Community Plan Land Use Designations. All of the areas designated for single family detached residential development on the Valley Center Community Plan Map are included on 568.8-acres, and the Commercial-Mixed Use/Multi-Family uses are grouped on three separate parcels totaling 39.2-acres. The single family area is designated VR 2.5 and is zoned RU reflecting the density obtained by dividing the 1,400 single family lots by 568.8-acres. There are single family residential areas in each of the five project phases.

The Village Center and two smaller Neighborhood Centers (31.9-acres) allow commercial,

mixed use and multi-family uses (including a total of 346 dwelling units), and are designated Village Core-Mixed Use and zoned with the C34 (Commercial-Residential) Use Regulation as shown on Figure 11 - Proposed Zoning. The overall gross density of these three areas based on the proposed development plan is 8.8-units per acre (346 dwelling units divided by 39.2-acres).

**Commercial and Mixed Use:** The Community contains 3 diverse Neighborhood Assets which are comprised of a 30.8-acre mixed-use commercial Village Center, in the northern portion of the Community and, two Neighborhood Centers, which are activity nodes located in the central and southerly portions of the Community. They have been specifically located to meet the standard for “walkable communities” by locating essential neighborhood commercial services within one-half-mile of all of the residential uses.

**School Site:** An 11.2-acre school site is proposed within the Specific Plan project area that will serve the Community.

**Recycling Facility (RF):** A Recycling Facility will be provided on-site per Section 6970-b of the Zoning Ordinance. The purpose of this facility is to provide waste recycling for project residents. Per the county Zoning Ordinance (2341), a Site Plan is required for this use.

**On-site Wastewater Treatment Plant and Reclamation Facility (WTPRF):** A Major Use Permit has been processed concurrently with the Specific Plan to provide treatment of effluent generated within the Community area. Implementation of the Major Use Permit or alternative treatment options will be determined by the Valley Center Municipal Water District.

**Other Facilities and Uses:** Additional elements of the proposed Community include public community, neighborhood and pocket parks; multi-use trails; pathways, bike paths and bike lanes; active orchards and other agricultural uses; associated community facilities such as a private recreation facility, community center, information center, Country Inn, and supporting infrastructure; as well as permanent preservation of biological open space. A complete age restricted neighborhood for seniors and an Assisted Living Facility which includes both a Group Residential Care facility, and a Senior Center are included with single family residential uses.

The Community is located in an area of agricultural uses together with existing residential and commercial uses. The Community will be designed in accordance with the guidelines, set forth in this Specific Plan. Community design features include landscaping throughout the Community, screening of the WTPRF and RF and lighting restrictions.

The proposed Community includes utilization of existing water wells at the discretion of the VCMWD. The Community will construct on-site drainage facilities, including water quality treatment and hydromodification basins, to protect against sedimentation resulting from storm water runoff. The system includes Site Design, Source Control and Treatment, Best Management Practices, as well as Low Impact Development measures such as rain water harvesting for each

single family home. The Community will be developed to meet all applicable County Code requirements in regard to the provision of solar facilities.

Grading is expected to take place in a number of phases over a period of years. The Specific Plan text includes a phasing plan for the development of the Community's component parts which would be coordinated with the level of available services, including roads, water, wastewater, and park services.

Primary access to the Community will be provided via West Lilac Road, which connects to Old Highway 395 to the west of the Community. The proposed circulation plan for the Community includes both on-and off-site road improvements. Additional access will be provided via Covey Lane, Rodriguez Road and Mountain Ridge Road as described in Section III.

The Community is within the Valley Center Municipal Water District ("VCMWD"). Groundwater may be used as a secondary source of irrigation for orchards and common area landscaping during drier and hotter periods of the year when authorized by the VCMWD.

## EXHIBIT “C”

### CONDITIONS FOR PRELIMINARY CONCEPT APPROVAL – LILAC HILLS RANCH

The Lilac Hills Ranch Community a multi-phased - mixed use development consisting of 1,746 new units and 16 existing home sites which will remain as part of the community, as indicated in the attached Table 1 – Lilac Hills Ranch Community (the “Project”). A Master Tentative Map (TM No. 5571 RPL-1) covering the entire project has been prepared and submitted to the County for approval. Subsequent Implementing Tentative Maps and Final Maps will be prepared for each project phase for approval by the County. The project is presently processing the Master Tentative Map and the Implementing Tentative Map for the first (northernmost) phase of the project.

In addition to the new development, the Developer will provide facilities for water and wastewater service to six (6) “perimeter” parcels which are not a part of the Project but are within or adjacent to the Project Boundary. Assessor’s parcel numbers for these “perimeter” parcels are provided in Table 2. The “perimeter” parcels currently receive water service from the District, but would be provided wastewater capacity by the Developer.

The combined area of the Project and the “perimeter” parcels is referred to as the LHR (Lilac Hills Ranch) Service Area and is summarized in Table 3.

The intent of this preliminary concept approval is to examine the major issues related to providing service to the Project and to provide direction for completion of the facility planning documents for each development phase, as designated in each subsequent Implementing Tentative Map. A more detailed evaluation and review of specific facilities proposed for the development will be provided once the facility planning documents, tentative maps and environmental review documents have been completed.

Two documents, one entitled “*Wastewater Management Alternatives for the Lilac Hills Ranch Community*” dated May 28, 2013 and the other “*Water Service for the Lilac Hills Ranch Community in the Valley Center Municipal Water District*” dated May 28, 2013, were prepared and submitted by Dexter Wilson Engineering, Inc. for District review. These documents describe the Project and the proposed water, wastewater and recycled water service requirements, design criteria and proposed offsite facilities needed to service the development.

**Preliminary Terms and Conditions for Concept Approval** – The following is a summary of the preliminary terms and conditions for concept approval for the development. These terms and conditions will provide the basis for amending the current preliminary development agreement with Accretive.

- **General Conditions**

- All water, wastewater and recycled water facilities to be dedicated to the District for ownership and maintenance shall be designed and constructed in accordance with the District’s operational requirements, standard specifications, policies and directives at no cost to the District.

- Preliminary design reports shall be submitted for the initial development phase and each following phase for further Board conceptual approval and preparation of District Facilities Agreements for the proposed improvements. Each preliminary design report shall include the remaining overall facility requirements and any modifications to the prior phasing plans.
- Developer shall maintain or relocate access to all existing District facilities with the Project, including but not limited to West Reservoir Site and existing pipelines.

- **Water Supply**

- The Developer has prepared and obtained Board approval of a Water Supply Assessment and Verification Report for entire project (Table 1 - Lilac Hills Ranch Community).
- The Project is served primarily from the District's Country Club Zone which lacks sufficient reservoir redundancy to serve the project. The Developer shall construct sufficient redundant reservoir capacity within the zone to serve the Project as part of the initial development phase, at no cost to the District.
- To provide the redundancy, several facility improvement alternatives located within the existing Country Club Reservoir and Old Country Club Reservoir sites are being evaluated, for selection and approval by District. Should an acceptable alternative for redundant capacity not be available within the existing reservoir sites, the Developer shall fund additional studies and environmental documents as necessary to evaluate additional offsite alternatives.
- District will consider crediting an appropriate portion of the cost of providing the redundant reservoir system for the Project toward the Project's meter capacity charges.
- A minor portion of the Project is served from the West Zone. A redundant supply from the Country Club zone via one or more pressure regulating stations shall be provided.

- **Water Distribution**

- The Developers will be responsible for the design, construction and dedication to the District of all water distribution facilities required for domestic water service and fire protection for the project.
- Any existing water transmission mains traversing the Project shall be protected in place, to the District's satisfaction, without adverse grading or improvements in the easement that would restrict access. If this cannot be accomplished, the main shall be relocated, at the Developer's expense, to roadways planned within the development.

- All water services for this development would have automatic remote real-time meter reading capabilities. The Developer shall provide additional data collection and communication facilities as may be required to automatically read the meters.
- Individual water service meters shall be provided for each single family and multi-family residential unit, including the individual units within a townhouse, condominium or apartment complex.

- **Wastewater Collection**

- The wastewater collection system is proposed as a gravity system with multiple lift stations as determined by topography.
- Collection system would be sized for full build out of the Lilac Hills Ranch Project in multiple phases.
- The list of parcels for which the Developer shall provide capacity (i.e., wastewater service area) are provided in the attached tables. No areas outside the LHR Service Area would be served.
- Wastewater service capacity to these parcels would be based on the properties current land use designations. One of the parcels is the existing Miller fire station on the south side of West Lilac Road.
- The Developer shall be responsible for the cost of facilities required to provide these parcels with wastewater capacity, including, but not limited to treatment capacity, capacity in the gravity collection system, and a connection to the gravity collection system.
- The Developer shall provide supporting documentation (e.g., agreement) to the District which memorializes the arrangement between the Developer and the parcel owner as to the party responsible for the improvements needed within the individual parcel to abandon the existing septic system, pursuit of County permits for the onsite work, and payment of connection and application fees for service from the District.
- Additionally, the Developer shall provide supporting documentation that the parcel has agreed to accept wastewater service and the resulting monthly wastewater water service charges from the District. The property owners shall process the normal applications for wastewater service with the District to become District customers.
- 

- **Wastewater Treatment Capacity**

- The LHR Service Area is not currently within the service area of the District's Lower Moosa Canyon Water Reclamation Facility (Moosa) Service Area. The District does not currently have wastewater capacity to serve the LHR Service Area. Capacity for the LHR Service Area shall be designed and constructed by the Developer, at no cost to the District.

- Wastewater capacity for the LHR Service Area would be constructed in multiple phases, acceptable to the District, as required to meet the build-out needs of the service area.
  - Wastewater Expansion Phases for the LHR Service Area shall be constructed, in conjunction with service requirements for the Moosa Service Area, within the existing Moosa site up to its maximum site capacity, not to exceed 1.0 mgd as set forth in the 1996 MUP Modification.
  - Once maximum site capacity at Moosa is reached, additional capacity as required for the balance of the Moosa Service Area and the LHR Service Area would be provided by construction of one or more expansion phases at a satellite water reclamation facility site located within the Project, with the solids (waste activated sludge) pumped to Moosa for processing.
  - Available permanent capacity at Moosa for the LHR Service Area shall be limited to the excess Moosa site capacity above that needed for the current Moosa Service Area.
  - With the initial phase of development, property within the Project of sufficient acreage to construct a water reclamation facility for the full capacity requirements of the LHR Service Area shall be dedicated to the District.
  - The Developer shall fund preparation of a Waste Discharge Report, and other studies as required, to modify the District's Waste Discharge Permit for the Lower Moosa Canyon WRF and future satellite WRF to include the capacity required for the LHR Service Area.
  - The Developer shall fund preparation of feasibility studies and funding applications as needed to obtain State and/or Federal funding for water reclamation facilities to serve the expanded Moosa Service, including the LHR Service Area, which would directly or indirectly benefit the Project.
- **Recycled Water Facilities**
    - The Developer shall prepare a recycled water study identifying the facilities needed to distribute and utilize the recycled water generated by the Project
    - The study shall include transmission main, seasonal and operational storage, beneficial use, and retrofit requirements needed for the full build out of Project.
    - With the initial phase of development, seasonal and operational storage site(s), acceptable to the District, of sufficient size and configuration to accommodate the proposed development shall be dedicated to the District.
- **Beneficial Reuse Areas**
    - The Developer shall identify and provide permanent irrigation areas sufficient for the beneficial use of the treated effluent generated by the proposed project.

- The Developer shall utilize recycled water within the proposed project, to the greatest extent possible, for all appropriate irrigation purposes in lieu of imported potable water.
- Recycled water shall not be used within the single family lots.
- One entity shall be established for the purpose of receiving and applying the recycled water in accordance with all recycled water regulations
- If the irrigation areas within the project are not sufficient to utilize all the recycled water generated by the project, the Developer shall provide a plan, acceptable to the District that demonstrates how the balance of the recycled water will be put to beneficial use on a permanent basis and how the facilities and sites, if required, needed to implement the plan would be funded.

- **Funding Provisions**

- All facilities and sites required for the Project shall be provided by the developers at no cost to the District.
- At the Developer(s) expense, the District will assist, as appropriate, in acquiring any State and Federal funding that may be available to finance or fund the required improvements.
- The reclamation studies prepared for funding applications shall include the available and planned treated effluent from the Moosa Service area for submittal to the Bureau of Reclamation for Title XVI funding and the State Water Resources Control Board for SRF funding.

**TABLE 1**

**LILAC HILLS RANCH COMMUNITY**

Land Use	Planning Areas	Net	Dwelling Units/Square Feet (SF)	Zoning
Single-Family Detached	SFD 1-8	165.4	903	RU
Single-Family Detached - Senior Citizen Community (Age-Restricted Units)	SFS 1-6	75.9	468	RU
Single-Family Attached	SFA 1-3	7.9	164	C34
Group Residential/Care	GR	6.5	N/A	RU
Commercial and Mixed-Use	C1-5	14.1	161/ 130,000 sf	C34
Country Inn	C1	1.2	50	C34
Senior Center	P11	3.3	N/A	RU
K-8 School Site	S	12.0	N/A	RU
Institutional Use	I	10.7	N/A	RU
Public Park	P10	12.0	N/A	RU
Private Parks	P 1-9 and within the Senior Citizen Neighborhood P-12 – 15	11.8	N/A	RU
Private Recreation	PR	2.0	N/A	C34
Biological Open Space	OS	102.7	N/A	RU
Common Areas and	--	18.8	N/A	RU
Manufactured Slopes	--	75.2	N/A	RU
Roads	--	83.3	N/A	RU
Water Reclamation Facility	WR	2.4	N/A	RU
Recycling Facility/Trail	RF	0.6	N/A	C34
Detention Basins	DB	5.5	N/A	RU
<b>SUBTOTAL</b>		<b>608</b>	<b>1,746</b>	
<b>Existing Dwelling Units to Remain</b>				
APN	Address	Acreage	EDU	Zoning
128-280-27	9151 W. Lilac Rd.	-	1	SR-4
128-290-07	9153 W. Lilac Rd.	-	1	SR-4
128-440-02	32444 Birdsong Dr	-	1	SR-4
128-290-74	32236 Shirey Rd.	-	1	SR-10
128-280-42	9007 West Lilac Road	-	1	SR-4
128-290-69	9419 West Lilac Road	-	1	SR-4
128-440-14	9553 Lilac Walk	-	1	SR-4
128-440-06	9383 West Lilac Road	-	1	SR-4
128-280-37	9307 West Lilac Road	-	1	SR-4
128-440-05	9381 West Lilac Road	-	1	SR-4
128-440-22	9435 West Lilac Road	-	1	SR-4
128-280-10	9167 West Lilac Road	-	1	SR-4
127-072-38	8709 West Lilac Road	-	1	SR-10
128-290-09	9431 West Lilac Road	-	1	SR-4
129-010-68	9883 West Lilac Road	-	1	SR-4
129-300-09	00000 Rodriguez Road	-	1	SR-4
<b>SUBTOTAL EXISTING HOMESITES</b>	-	-	<b>16</b>	
<b>TOTAL</b>	-	<b>608</b>	<b>1,762</b>	

SR-4 is 1 unit per 4 acres, SR-10 is 1 units per 10 acres

<b>TABLE 2</b>				
<b>EXISTING PARCELS WITHIN PROJECT PERIMETER</b>				
<b>APN</b>	<b>Owner</b>	<b>Acreage</b>	<b>EDU</b>	<b>Zoning</b>
128-440-07	Sheffer	3.27	1	SR-4
128-440-11	Mariscal	5.00	1	SR-4
128-280-56	Salm	5.57	1	SR-4
128-280-28	State of California – CALFIRE	1.90	4	Public
128-280-43	Hernandez	0.56	1	SR-4
128-280-44	Gomez	0.76	1	SR-4
<b>TOTAL</b>	-	<b>17.06</b>	<b>9</b>	-

SR-4 is 1 unit per 4 acres

<b>TABLE 3</b>		
<b>LILAC HILLS RANCH SERVICE AREA</b>		
<b>Grouping</b>	<b>Acreage</b>	<b>EDUs</b>
Lilac Hills Ranch Community		
New Development	-	1,746
Existing Homesites to Remain	-	16
Subtotal	608	1,762
Perimeter Parcels	17.06	9
<b>TOTAL</b>	<b>625.06</b>	<b>1,771</b>

**Sec. 503.2.3.1 Surfacing materials.** The minimum surfacing materials required for fire apparatus access roads shall vary with the slope of the roadway as follows:

0-10% Slope	4" Decomposed Granite
11-15% Slope	2" Asphaltic Concrete
16-20% Slope	3" Asphaltic Concrete

The paving and sub-base shall be installed to the standards specified in Section I-M of the County of San Diego Off-street Parking Design Manual. A residential driveway constructed of 3½" Portland cement concrete may be installed on any slope up to 20% provided that slopes over 15% have a deep broom finish perpendicular to the direction of travel to enhance traction.

**Sec. 503.2.3 Surface.** Fire apparatus access road shall be designed and maintained to support the imposed loads of fire apparatus (not less than 75,000 lbs. unless authorized by the FAHJ) and shall be provided with an approved paved surface so as to provide all-weather driving capabilities. The paving and sub-base shall be installed to the standards specified in Section I-M of the County of San Diego Off-street Parking Design Manual. A residential driveway constructed of 3½" Portland cement concrete may be installed on any slope up to 20% provided that slopes over 15% have a deep broom finish perpendicular to the direction of travel or other approved surface to enhance traction.

## 12 M. PAVING THICKNESS SCHEDULE AND DETAILS.

Except for zones subject to the Agricultural Use Regulations, and the S-87 Use Regulations, all parking spaces, loading spaces and driveways serving them shall be hard surfaced with a minimum of 1.5" of hot or cold mixed bituminous surfacing or 3.5" of portland cement concrete; provided, however, that parking spaces and driveways accessory to one-family and two-family dwellings need not be surfaced with a more durable type of surfacing than that which exists on the street which provides access to the lot or building site upon which such dwelling is located. Required surfacing shall be placed on a suitably prepared base. Within the desert areas of the North Mountain, Mountain Empire and Desert Subregional Plan areas, 4 inches of decomposed granite or suitable alternate material may be approved by the Director of Planning in lieu of more durable paving on residential driveways.

REQUIRED THICKNESS OF A/C AND SUBBASE*			
Existing Soil Classifications	Residential General Parking for Autos Serving Not More Than 4 Spaces	Multi-Family Commercial Store Frontage Parking	Commercial Heavy Duty Truck Loading and Parking
<b>GOOD TO EXCELLENT BASE</b> Decomposed granite, well graded sands and gravels which retain load supporting capacity when wet.	2" A/C on existing soil	3" A/C on existing soil	3" A/C on 5" aggregate base or 4" A/C on aggregate base or 5" A/C on existing soil
<b>MEDIUM BASE</b> Silty sands and sand gravels containing moderate amounts of clay and fine silt. Retains moderate amount of firmness under adverse moisture conditions.	2" A/C on 6" of decomposed granite base or 3" A/C on 3" aggregate base or 4" on existing soil	3" A/C on 5" aggregate base or 4" A/C on 3" aggregate base or 5" on existing soil	3" A/C on 7" aggregate base or 4" A/C on 5.5" aggregate base or 6" A/C on existing soil
<b>POOR BASE</b> Soils having appreciable amounts of clay and fine silt. Soils become quite soft and plastic when wet.	3" A/C on 5.5" aggregate base or 5" A/C on existing soil	3" A/C on 8" aggregate base or 4" A/C on 5.5" aggregate base or 6" A/C on existing soil	3" A/C on 12" aggregate base or 4" A/C on 10.5" aggregate base or 8" A/C on existing soil

\*This paving thickness design for A/C paving shall be used unless a pavement design by a registered civil engineer

Attachment D – Storm Water Management Plan for Master Tentative Map (total 608 Acre Project) – Page 1 of 3

Question 21 –Justify each of your answers for each of the indicated areas (red circles), in light of contradictory information in Attachment E - Storm Water Management Plan for Implementing Tentative Map and Table 6 on Page 3 of 3 in this Attachment, and the Hydro Modification Management Plan.

**STEP 1**

**PRIORITY DEVELOPMENT PROJECT DETERMINATION**

**TABLE 1: IS THE PROJECT IN ANY OF THESE CATEGORIES?**

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	A	<b>Housing subdivisions of 10 or more dwelling units.</b> Examples: single-family homes, multi-family homes, condominiums, and apartments.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	B	<b>Commercial—greater than one acre.</b> Any development other than heavy industry or residential. Examples: hospitals; laboratories and other medical facilities; educational institutions; recreational facilities; municipal facilities; commercial nurseries; multi-apartment buildings; car wash facilities; mini-malls and other business complexes; shopping malls; hotels; office buildings; public warehouses; automotive dealerships; airfields; and other light industrial facilities.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	C	<b>Heavy industry—greater than one acre.</b> Examples: manufacturing plants, food processing plants, metal working facilities, printing plants, and fleet storage areas (bus, truck, etc.)
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	D	<b>Automotive repair shops.</b> A facility categorized in any one of Standard Industrial Classification (SIC) codes 5013, 5014, 5541, 7532-7534, or 7536-7539
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	E	<b>Restaurants.</b> Any facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC code 5812), where the land area for development is greater than 5,000 square feet. Restaurants where land development is less than 5,000 square feet shall meet all SWSMP requirements except for structural treatment BMP and numeric sizing criteria requirements and hydromodification requirements.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	F	<b>Hillside development greater than 5,000 square feet.</b> Any development that creates 5,000 square feet of impervious surface and is located in an area with known erosive soil conditions, where the development will grade on any natural slope that is twenty-five percent or greater.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	G	<b>Environmentally Sensitive Areas (ESAs).</b> All development located within or directly adjacent to or discharging directly to an ESA (where discharges from the development or redevelopment will enter receiving waters within the ESA), which either creates 2,500 square feet of impervious surface on a proposed project site or increases the area of imperviousness of a proposed project site to 10% or more of its naturally occurring condition. "Directly adjacent" means situated within 200 feet of the ESA. "Discharging directly to" means outflow from a drainage conveyance system that is composed entirely of flows from the subject development or redevelopment site, and not commingled with flows from adjacent lands.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	H	<b>Parking lots 5,000 square feet or more</b> or with 15 or more parking spaces and potentially exposed to urban runoff.
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	I	<b>Street, roads, highways, and freeways.</b> Any paved surface that is 5,000 square feet or greater used for the transportation of automobiles, trucks, motorcycles, and other vehicles.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	J	<b>Retail Gasoline Outlets (RGOs)</b> that are (a) 5,000 square feet or more or (b) a projected Average Daily Traffic (ADT) of 100 or more vehicles per day.

**Attachment D – Storm Water Management Plan for Master Tentative Map (total 608 Acre Project) – Page 2 of 3**

**Question 22 –Justify each of your answers for each of the indicated areas (red circles), in light of contradictory information in Attachment E - Storm Water Management Plan for Implementing Tentative Map and Table 6 on Page 3 of 3 in this Attachment, and the Hydro Modification Management Plan**

**STEP 2**

**PROJECT STORMWATER QUALITY DETERMINATION**

Total Project Site Area 608.0 Acres

Estimated amount of disturbed acreage: 440 Acres

(If >1 acre, you must also provide a WDID number from the SWRCB)

WDID: Deferred to during final engineering

Complete A through C and the calculations below to determine the amount of impervious surface on your project before and after construction.

- A. Total size of project site: 608.0 Acres
- B. Total impervious area (including roof tops) before construction: 71 Acres
- C. Total impervious area (including roof tops) after construction: 72 Acres

Calculate percent impervious before construction:  $B/A = 11.7\%$

Calculate percent impervious after construction:  $C/A = 11.8\%$

**Attachment D – Storm Water Management Plan for Master Tentative Map (total 608 Acre Project) – Page 3 of 3**

**Question 23 – a) Is this a current, accurate and complete listing of intended land uses for the entire 608 acre Project? b). Please Geo locate these land uses on a map and indicate their relative footprint in acreage for residential and square footage for commercial. c) Expand and comprehensively explain each of the “potential” footnotes with data.**

**TABLE 6: ANTICIPATED AND POTENTIAL POLLUTANTS GENERATED BY LAND USE TYPE**

<i>PDP Categories</i>	<i>General Pollutant Categories</i>								
	Sediments	Nutrients	Heavy Metals	Organic Compounds	Trash & Debris	Oxygen Demanding Substances	Oil & Grease	Bacteria & Viruses	Pesticides
Detached Residential Development	X	X			X	X	X	X	X
Attached Residential Development	X	X			X	P <sup>(1)</sup>	P <sup>(2)</sup>	P	X
Commercial Development 1 acre or greater	P <sup>(1)</sup>	P <sup>(1)</sup>		P <sup>(3)</sup>	X	P <sup>(3)</sup>	X	P <sup>(3)</sup>	P <sup>(3)</sup>
Heavy industry (industrial development)	X		X	X	X	X	X		
Automotive Repair Shops			X	X <sup>(4)(5)</sup>	X		X		
Restaurants					X	X	X	X	
Hillside Development >5,000 ft <sup>2</sup>	N	N			N	N	N		N
Parking Lots	P <sup>(1)</sup>	P <sup>(1)</sup>	X		X	P <sup>(1)</sup>	X		P <sup>(1)</sup>
Retail Gasoline Outlets			X	X	X	X	X		
Streets, Highways & Fireways	N	P <sup>(1)</sup>	N	N <sup>(4)</sup>	N	P <sup>(3)</sup>	N		

X = anticipated  
P = potential  
(1) A potential pollutant if landscaping exists on-site.  
(2) A potential pollutant if the project includes uncovered parking areas.  
(3) A potential pollutant if land use involves food or animal waste products.  
(4) Including petroleum hydrocarbons.  
(5) Including solvents.

Attachment E – Storm Water Management Plan for Implementing Tentative Map (114.9 Acre/352 EDU First Phase) – Page 1 of 3

Question 25 – Justify each of your answers for each of the indicated areas (red circles), in light of contradictory information in Attachment D - Storm Water Management Plan for Master Tentative Map and Table 6 on Page 3 of 3 in this Attachment, and the Hydro Modification Management Plan

**STEP 1**

**PRIORITY DEVELOPMENT PROJECT DETERMINATION**

**TABLE 1: IS THE PROJECT IN ANY OF THESE CATEGORIES?**

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
		<b>A</b>	<b>Housing subdivisions of 10 or more dwelling units.</b> Examples: single-family homes, multi-family homes, condominiums, and apartments.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>B</b>	<b>Commercial—greater than one acre.</b> Any development other than heavy industry or residential. Examples: hospitals; laboratories and other medical facilities; educational institutions; recreational facilities; municipal facilities; commercial nurseries; multi-apartment buildings; car wash facilities; mini-malls and other business complexes; shopping malls; hotels; office buildings; public warehouses; automotive dealerships; airfields; and other light industrial facilities.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>C</b>	<b>Heavy industry—greater than one acre.</b> Examples: manufacturing plants, food processing plants, metal working facilities, printing plants, and fleet storage areas (bus, truck, etc.).
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>D</b>	<b>Automotive repair shops.</b> A facility categorized in any one of Standard Industrial Classification (SIC) codes 5013, 5014, 5541, 7532-7534, or 7536-7539.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>E</b>	<b>Restaurants.</b> Any facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC code 5812), where the land area for development is greater than 5,000 square feet. Restaurants where land development is less than 5,000 square feet shall meet all SUSMP requirements except for structural treatment BMP and numeric sizing criteria requirements and hydromodification requirements.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>F</b>	<b>Hillside development greater than 5,000 square feet.</b> Any development that creates 5,000 square feet of impervious surface and is located in an area with known erosive soil conditions, where the development will grade on any natural slope that is twenty-five percent or greater.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>G</b>	<b>Environmentally Sensitive Areas (ESAs).</b> All development located within or directly adjacent to or discharging directly to an ESA (where discharges from the development or redevelopment will enter receiving waters within the ESA), which either creates 2,500 square feet of impervious surface on a proposed project site or increases the area of imperviousness of a proposed project site to 10% or more of its naturally occurring condition. "Directly adjacent" means situated within 200 feet of the ESA. "Discharging directly to" means outflow from a drainage conveyance system that is composed entirely of flows from the subject development or redevelopment site, and not commingled with flows from adjacent lands.
<input checked="" type="checkbox"/>	<input type="checkbox"/>		<b>Parking lots 5,000 square feet or more</b> or with 15 or more parking spaces and potentially exposed to urban runoff.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>I</b>	<b>Street, roads, highways, and freeways.</b> Any paved surface that is 5,000 square feet or greater used for the transportation of automobiles, trucks, motorcycles, and other vehicles.
<input checked="" type="checkbox"/>	<input type="checkbox"/>		<b>Retail Gasoline Outlets (RGOs)</b> that are: (a) 5,000 square feet or more or (b) a projected Average Daily Traffic (ADT) of 100 or more vehicles per day.

**Attachment E – Storm Water Management Plan for Implementing Tentative Map (114.9 Acre/352 EDU First Phase) – Page 2 of 3**

**Question 26 – Justify each of your answers for each of the indicated areas (red circles), in light of contradictory information in Attachment D - Storm Water Management Plan for Master Tentative Map and Table 6 on Page 3 of 3 in this Attachment, and the Hydro Modification Management Plan**

**STEP 2  
PROJECT STORMWATER QUALITY DETERMINATION**

Total Project Site Area 114.9 Acres

Estimated amount of disturbed acreage: 112.3 Acres  
(If >1 acre, you must also provide a WDID number from the SWRCB)

WDID: Deferred to during final engineering

Complete A through C and the calculations below to determine the amount of impervious surface on your project before and after construction.

- A. Total size of project site: 114.9 Acres
- B. Total impervious area (including roof tops) before construction: 11.6 Acres
- C. Total impervious area (including roof tops) after construction: 28.3 Acres

Calculate percent impervious before construction:  $B/A = 10.1\%$   
Calculate percent impervious after construction:  $C/A = 24.6\%$

**From Hydro Modification Impervious Area after Construction:**

EDU	Basin/Sub Basin	Acreage
282	903/100	11.65
38	903/200	1.57
<u>32</u>	903/300	<u>1.32</u>
<b>Sub total Added impervious</b>		<b>14.54</b>
<b>Existing impervious</b>		<b><u>11.60</u></b>
<b>Total</b>		<b>26.14</b>

Attachment E – Storm Water Management Plan for Implementing Tentative Map (114.9 Acre/352 EDU First Phase) – Page 3 of 3

Question 27 – a) Is this a current, accurate and complete listing of intended land uses for the first phase – 114.9 acre/352 EDU ? b). Please Geo locate these land uses on a map and indicate their relative footprint in acreage for residential and square footage for commercial. c) Expand and comprehensively explain each of the “potential” footnotes with data.

**TABLE 6: ANTICIPATED AND POTENTIAL POLLUTANTS GENERATED BY LAND USE TYPE**

<i>PDP Categories</i>	<i>General Pollutant Categories</i>								
	Sediments	Nutrients	Heavy Metals	Organic Compounds	Trash & Debris	Oxygen Demanding Substances	Oil & Grease	Bacteria & Viruses	Pesticides
Detached Residential Development	X	X			X	X	X	X	X
Attached Residential Development	X	X			X	P <sup>(1)</sup>	P <sup>(2)</sup>	P	X
Commercial Development 1 acre or greater	P <sup>(1)</sup>	P <sup>(1)</sup>		P <sup>(2)</sup>	X	P <sup>(3)</sup>	X	P <sup>(3)</sup>	P <sup>(3)</sup>
Heavy industry /industrial development	X		X	X	X	X	X		
Automotive Repair Shops			X	X <sup>(4)</sup>	X		X		
Restaurants					X	X	X	X	
Hillside Development >5,000 ft <sup>2</sup>	X	X			X	X	X		X
Parking Lots	P <sup>(1)</sup>	P <sup>(1)</sup>	X		X	P <sup>(1)</sup>	X		P <sup>(1)</sup>
Retail Gasoline Outlets			X	X	X	X	X		
Streets, Highways & Freeways	X	P <sup>(1)</sup>	X	X <sup>(4)</sup>	X	P <sup>(3)</sup>	X		

X = anticipated  
P = potential  
(1) A potential pollutant if landscaping exists on-site.  
(2) A potential pollutant if the project includes uncovered parking areas.  
(3) A potential pollutant if land use involves food or animal waste products.  
(4) Including petroleum hydrocarbons.  
(5) Including solvents.

Mark,

Oliver Smith of the Valley Center Community Planning Group had asked the Library to review this document. The draft EIR indicates that the Valley Center branch library, given its current size, can accommodate the expected residential growth resulting from this development project. We certainly agree with that. However, there is perhaps a better way to phrase this than using the term "surplus" of space.

I've excerpted the paragraph in question below (page 3-81) and inserted comments and proposed changes in red.

The Valley Center branch library is located at 29200 Cole Grade Road. As disclosed in the GPU FEIR, the **minimum** facility requirement for Valley Center is 6,856 square feet based on a population of 13,759 **[comment: SANDAG's 2012 estimated population for Valley Center is 15,234; using this figure, the minimum facility requirement would be 7,617 square feet]** residents. The existing facility is 14,068 square feet, ~~representing a surplus of 7,212 square feet in library facility services~~ **exceeding the minimum space requirement and able to accommodate future residential growth, including this proposed development project.**

Please let me know if you have any questions.

Thanks,

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