



August 8, 2013

Mr. Mark Wardlaw, Director
County of San Diego
Planning & Development Services
5510 Overland Ave., Suite 110,
San Diego, CA 92123

Comments on Draft EIR – Lilac Hills Ranch Master
Planned Community

Dear Mr. Wardlaw:

Pursuant to the County of San Diego's July 3, 2013 NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, DRAFT HABITAT LOSS PERMIT, GENERAL PLAN AMENDMENT AND SPECIFIC PLAN, the Valley Center / Pauma Unified School District (VCPUSD) offers this written comment to the draft Environmental Impact Report in accordance with the California Environmental Quality Act along with a General Plan Amendment and Specific Plan for the following project: PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM), PDS2012-3300-12-005 (MUP), PDS2012-3500-12-017 (STP), PDS2012-3500-12-018 (STP), HLP XX-XXX LOG NO. 3910 12-02-003 (ER); SCH NO. 2012061100 LILAC HILLS RANCH MASTER PLANNED COMMUNITY.

The Lilac Ranch Planned Community entails a legislative action by the County Board of Supervisors and as such the proposal does not have prescriptive development rights. The Valley Center Pauma Unified School District has every right and expectation to request for full mitigation of impact the proposal, if approved, will have on schools. This is the same treatment that is afforded law enforcement, public services, parks and recreation as well as the county public works department.

The VCPUSD has repeatedly and clearly expressed detailed concerns about the mitigation of impacts of the proposed Lilac Hills development to this school district. Please reference and consider as repeated comments the letters and email communications of July 20, 2010, November 29, 2010, August 2010, December 2010, February 28, 2011, including the July 25, 2012 response to Notice of Preparation of EIR also provided as comments to this draft EIR.

Superintendent
Dr. Lou Obermeyer

Board of Trustees
Karen J. Burstein

Lori A. Johnson
Donald L. Martin

Mary Polito
Michael T. Robledo

The developer provided written mitigations that are in direct conflict with the draft EIR mitigations for schools, and the draft EIR leaves all issues previously mentioned still unresolved. The VCPUSD wishes to voice ongoing concerns with the lack of response to previously submitted issues and wishes to oppose the approval of this draft EIR until and unless our concerns are addressed within the document.

The concerns remaining unaddressed by this EIR are:

1. School Location approval
2. Shared approach to proposed K-8 school
3. School Fees as complete mitigation
4. Transportation impacts due to available school attendance locations

In detail, we provide the following:

1. School Location approval: The Executive Summary on page S-1 and elsewhere in the document specifically uses the word 'may' when referring to providing for a school in the new community. Considering their acknowledged impact of over 1,000 students in an area where the students would need to be bussed or drive themselves out of the neighborhood to attend the VCPUSD, the lack of conviction to provide an identified site is confusing and causes concern.

VCPUSD has repeatedly requested the identification of the specific 12 acre site upon which the developer intends to allow placement of the proposed K-8 school so that appropriate feedback can be provided. The developer has clearly identified the space for a church, the place for a senior center, specific park sites and walking trails (Page 1-8), but has not bothered to show the proposed school location. This lack of a specific site will not allow either district involved to use this EIR to support any future action to build a school in this development.

As Lead Agency, the County of San Diego should, at minimum, require the developer to identify the school site location showing the net useable 12 acres and provide appropriate studies of that location sufficient to assure that the site will meet the requirements of the California Department of Education, Title 5 for K-8 facilities, following the School Site Selection Guide at <http://www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp> .

Without an identified location, how can school traffic be studied, need for available utilities and roads be addressed or any reasonable review of how their proposed school site would meet the needs of the students and allow VCPUSD to serve those students?

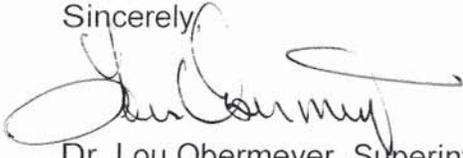
2. Shared approach to proposed K-8 school: On page 3-82, the document describes an offer to 'reserve' a 12 acre site, "for possible acquisition by a school district". On page 1-7 it describes this as, "The two local school districts would have an opportunity to acquire the site based on their independent assessment of their facility needs. It is also possible that a private school would acquire the site. If neither a public or private entity obtains the site, it may be considered for an alternative use." The draft also states that the site will be held up to a point dictated by law, but doesn't mention how long or what legal basis would be used to allow utilization of the set aside school site for an alternative, possibly more lucrative, use by the developer.

The offer of an undisclosed site, for an unknown period of time to an unidentified third party who would have to vie for the site in an undetermined manner cannot be deemed as acceptable to VCPUSD. The students within the VCPUSD attendance boundary will be the most impacted by the need to transport great distances of an hour or more each way. A reasonable and responsible method of prioritized offering of any school site should be negotiated and identified within the EIR, along with a determined schedule of time that the both impacted districts can be assured of the acreage's availability and cost basis.

3. School Fees as complete mitigation Page 3-83: As developers and school districts in the State of California are well aware, we are in an unprecedented time of fiscal crisis. A legislated stay on Level III schools fees is in place which blocks school districts from collecting the maximum share of local dollars needed to fully fund school impact costs associated with new communities. Additionally, the State is cannot provide matching funds at this time and will not be able to do so unless a future statewide bond measure is passed. The impact of this development is not anticipated to be covered by statutory fees, as acknowledged in written correspondence from the developer, yet the draft EIR ignores that correspondence and offers of assistance and stands on the State's damaged statutory fees as a basis of full mitigation. The privilege of building a new community must come with the responsibility of providing appropriate and required infrastructure and the VCPUSD's ability to build a new school of any size within the community is not fully mitigated by statutory fees.
4. Transportation impacts due to available school attendance locations: Neighborhood schools are vital to a well designed community. The cost during the life of the community of not having their kids attending a school within walking distance of their home is great on both the environment and the health of the students. There is inconsistency in the student estimates used in the Traffic

Study of Appendix E and the assumptions on page 3-82. There was no discussion of the drive times involved in student bussing and the long term impacts on student education and family life. The VCPUSD has an interest in serving our student population in an effective, efficient and healthy manner and cannot support new development that does not address the whole student and family impacts of the action proposed.

Sincerely,

A handwritten signature in black ink, appearing to read "Lou Obermeyer", with a large, stylized flourish extending from the end of the name.

Dr. Lou Obermeyer, Superintendent

Valley Center-Pauma Unified School District

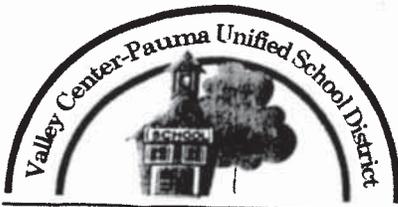
Encl: Letters and email communications mentioned herein.

C: Darren Gretler, Assistant Director, County of San Diego Planning & Development Services

Mark Slovick, County of San Diego Planning & Development Services

J. Branch – San Diego County Office of Education

Oliver Smith – Chairperson, Valley Center Planning Group



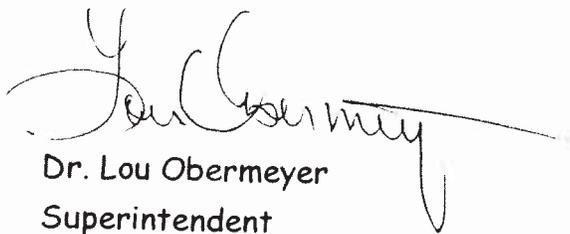
July 20, 2010

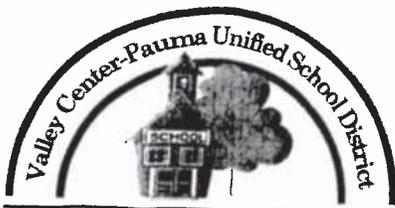
County of San Diego
Cheryl Jones
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Ms. Jones:

Enclosed please find a letter for the San Diego Planning Commission regarding the proposed Accretive project in Valley Center. Please forward this letter to the members of the planning commission and please include the letter as part of the Public Hearing scheduled for August 6, 2010 regarding the Accretive project.

Thank you for your assistance,


Dr. Lou Obermeyer
Superintendent



July 20, 2010

County of San Diego
San Diego Planning Commission
Attention: Cheryl Jones
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Members of the San Diego Planning Commission:

I am writing this letter to you with the intent to provide accurate information about the proposed Accretive project in the Valley Center area. As superintendent of the Valley Center-Pauma Unified School District I am neither supporting nor opposing the Accretive project; however, I want to insure that you are provided with accurate information about the proposed new school(s) included in the Accretive project.

On November 9, 2009, I met with Accretive representatives, Randy Goodson and Jon Rilling so they could present information about their proposed project which is located within the Valley Center-Pauma USD attendance boundaries. The presentation included information about proposed school sites, either 1 or 2 schools, with configurations to be determined (i.e. K-8, middle or elementary). After listening to the information, I asked them how they intended to pay for the schools, explaining that the school district does not have sufficient funds to build additional schools. I explained that the State School Facilities program funds about 40% for new school facilities (if district's meet State criteria), developer fees fund an additional 20 - 30%, so a potential 30 - 40% fund gap would exist. To fully fund new school facilities in the proposed Accretive development, I suggested that Mr. Goodson consider a Mello Roos or CFD to fill the funding gap. Mr. Goodson's suggestion was to have the school district pass a general obligation bond

Superintendent
Dr. Lou Obermeyer

Board of Trustees
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to fill the funding gap. I explained that the district has no interest or intent to ask community members to pass a bond to build a school due to the economy. I further explained that, due to declining enrollment in our school district for the past 7 years and the State's current fiscal condition which has cut education funds significantly, the school district closed an elementary school in 2008.

I further explained that, since the school district would not be able to build new school facilities, students in the proposed development would attend school in existing schools and would be transported via school bus (an approximate hour ride). In fairness to prospective homebuyers, parents would need to be made aware that students would attend existing schools in Valley Center-Pauma USD.

Mr. Goodson mentioned that, should the Valley Center-Pauma USD not build a new school, he would seek a change of attendance boundaries so students would attend school in a neighboring school district.

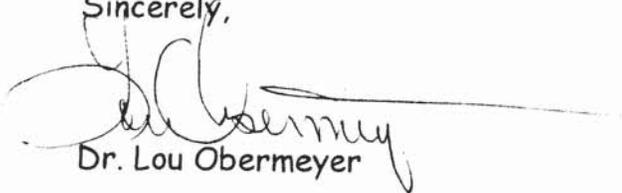
To summarize my concerns, I offer the following information:

- Valley Center-Pauma USD closed an elementary school in 2008. Prior to building another school the elementary school would be re-opened.
- To meet criteria for State funding, current facilities would need to be at capacity.
- Students would attend existing schools with an approximate hour-long ride to school.
- Accretive has a responsibility to be transparent with prospective homebuyers informing them that students would attend existing schools.
- The Valley Center-Pauma USD has no intentions to ask community members to pass a general obligation bond to fund a new school since current school buildings are vacant.
- Changing school district attendance boundaries is a lengthy and expensive process, needing approval by affected school district boards' of education, the county office board of education, and CDE approval.

I fully understand that SB 50 limits a school district's ability to impose additional developer fees to fully fund new school facilities and an EIR does not include mitigation for school facilities. Therefore, it is important for you to have the above information as you make your determination about the future of a proposed development that includes the promise of new school facilities.

Again, this letter is not submitted to you in support for or opposition against the proposed development; it is submitted to allow you to be informed about a proposed development in our school district's attendance area.

Sincerely,

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

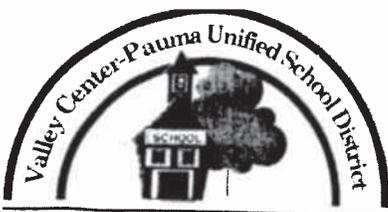
Dr. Lou Obermeyer

Superintendent

Cc: Sandy Smith, Vice-Chair of the VCCPG Mobility Subcommittee

Dee Dee Ortega

From: Dee Dee Ortega
Sent: Tuesday, July 20, 2010 2:08 PM
To: 'Cheryl.Jones@sdcounty.ca.gov'
Subject: Letter of Planning Commission
Attachments: 2010_07_20_14_06_54



November 29, 2010

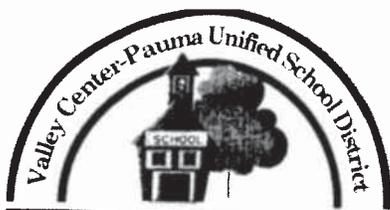
County of San Diego
Cheryl Jones
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Ms. Jones:

Enclosed please find a letter for the San Diego Planning Commission regarding the proposed Accretive project in Valley Center. Please forward this letter to the members of the planning commission and please include the letter as part of the Public Hearing scheduled for December 17, 2010 regarding the Accretive project.

Thank you for your assistance,

Dr. Lou Obermeyer
Superintendent



November 29, 2010

Dear Members of the San Diego Planning Commission:

It is my understanding that a public hearing regarding the Accretive project has been scheduled for December 17, 2010. Please include this letter as part of the public hearing scheduled for December 17, 2010.

The intent of this letter is to update the Planning Commission on communication with Accretive representative Jon Rilling after the public hearing on August 6, 2010.

As I stated in my July 20, 2010 letter, as superintendent of the Valley Center-Pauma Unified School District, I am neither supporting nor opposing the Accretive project. However, I again want to be sure you have accurate information about the proposed new school (s) included in the Accretive project and the communication I've had with Accretive representative, Jon Rilling.

Funding for School (s): On August 11, 2010, Jon Rilling communicated with me via email (enclosed) to schedule a meeting to "outline how we can help support your district's goals as we plan for our future in the community". My response on August 23, 2010, after checking with Mark Slovick in an effort to ascertain the Planning Commission's request/directive to Accretive at the August 6, 2010 public hearing, was to clarify how Accretive will fund school (s) in their planned development. You will see from Mr. Rilling's email reply that the funding for new school (s) is not included in his information, other than to state that a general obligation bond would not be used (I have stated previously that our school district does not have an interest in pursuing a general obligation bond for construction). It is important for the Planning Commission to understand that funding for new school construction, beyond mandatory developer fees would need to come from a general obligation

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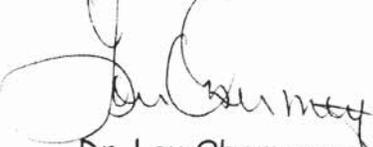
Planning Director
Henry P. Van Wyk, DVM

bond, Mello-Roos Community Facilities bond or additional developer fees. The school district will not be eligible for state construction funds from the State School Facilities program because we have an empty school (Valley Center Upper School). This is the information that I have sought from Mr. Rilling, and, to date, have not received. Again, it is important to know how Accretive will fund a new school (s). Otherwise, prospective homebuyers, and in particular, parents, would need to know that students would be transported to existing schools in our district.

Bussing Regulation: On page 15 (enclosed) of the minutes of Planning Commission minutes dated August 6, 2010, first paragraph, please not the comments by Randy Goodson, "...and then the high school solution is that we would have a dedicated bus. It's a half-an-hour trip; the hour bus ride reflects—the bus—school buses are allowed to stop 30times; they're not allowed to stop more than 30 times but they typically—given budget constraints—go to that limit." I am unfamiliar with the regulation that Mr. Goodson must be referring to in his comments to the Planning Commission about a limit to the number of stops a bus can make. I checked with the school district's Director of Transportation and the CHP and neither knew what regulation Mr. Goodson was referring to in his comments. It would be helpful and important for Mr. Goodson to let the Planning Commission and school district know what he if referring to so that this might be cleared up.

Thank you for your time and consideration.

Sincerely,



Dr. Lou Obermeyer

Cc: Oliver Smith, Valley Center Community Planning Group

PAA 09-007, Agenda Item 1:

Randy Goodson: ...and then the high school solution is that we would have a dedicated bus. It's a half-an-hour trip; the hour bus ride reflects-- the bus-- school buses are allowed to stop 30 times; they're not allowed to stop more than 30 times but they typically-- given budget constraints-- go to that limit. So, when you have a school bus that starts and stops 30 times and then continues the journey to school, that really stretches out the length. So for students in and around our community, we would offer a direct bus ride that would really streamline the commute and get it back to 30 minutes and then ultimately with Road 3 and the ultimate condition, that would certainly be the optimal and would reduce the length of bus rides for everybody in the northwest portion of Valley Center.

Comm. Woods: Okay, then my last question and I'll let my other colleagues weigh in-- water: where are-- where do you expect and how long of a run do you have to achieve with, I'm assuming, the Valley Center water district or are you going north or what?

Randy Goodson; I apologize. I wanted just to grab an Exhibit. If you wish, I can show you an Exhibit. With water, the reason that we are paying to continue to replant dead and dying groves-- some trees were let to die before we acquired them or we weren't able to revive them when we turned on the water. We lose about \$300,000 a year watering because we maintain our water allocation. When we combine our-- and I have the specific numbers if you'd like to look at a chart, but when our water allocation from the Valley Center municipal water district to our onsite production of water-- we have 109% of the water needed on a net basis for our community, and the net basis means after recycling because under State law-- I mean, we'll recycle anyway-- but we'll provide recycling not just for our own common areas, but also we'll have extra recycling available for the golf courses. Of the three golf courses that are within two miles of and downstream from the sewer treatment facility, the two golf courses at Lawrence Welk are already purple piped. Don Fredericks, the owner, grandson of Lawrence Welk, spoke here in favor on March 5th and mentioned that he would like the access to recycled water, because its also discounted.

Comm. Woods: Okay, I'll let my colleagues continue.

Chairman Brooks: Thank you. Further questions of applicant? There being none, thank you.

Randy Goodson: Thank you.

Subject: RE: Following Up

Date: Friday, August 27, 2010 9:22 AM

From: Slovick, Mark <Mark.Slovick@sdcounty.ca.gov>

To: Lou Obermeyer <obermeyer.lo@vcpusd.k12.ca.us>

Cc: "Grunow, Richard" <Richard.Grunow@sdcounty.ca.gov>

Hi Lou,

The Planning Commission's motion did include a request for technical studies and additional information on traffic, water, waste water and schools. However, the Planning Commission did not direct the applicant to meet with the district. As stated below, the minutes are draft and have not been formally approved by the Planning Commission. The commission is scheduled to review the minutes at their September 3rd hearing. Please let me know if you have any other questions.

Thanks,

Mark

From: Lou Obermeyer [mailto:obermeyer.lo@vcpusd.k12.ca.us]

Sent: Thursday, August 26, 2010 8:32 AM

To: Slovick, Mark

Subject: FW: Following Up

Hi Mark,

Thanks for reviewing

Lou

From: Jon Rilling [mailto:jon@accretive-group.com]

Sent: Wednesday, August 25, 2010 10:29 AM

To: Lou Obermeyer

Subject: RE: Following Up

Dear Lou,

I appreciate you looking into this. I have included for your own information, the draft minutes and transcript of the last part of the Planning Commission hearing from Friday August 6. On page 30, Commissioner Day's Motion, stated:

"I would make a motion to continue this hearing, to return the end of November and to request technical studies on traffic, water, waste water and schools."

The minutes of the meeting are still draft until the Planning Commission formally approves them, however based on this recommendation, we want to work with you to come up with a plan that achieves the district's goals in harmony with our concept of a residential mixed-use neighborhood. Schools and education are paramount to building a successful community and its our goal to help enhance the educational environment in the Valley Center school district, not detract from it.

I would propose the following agenda and topics for discussion:

1. The District's goals & objectives:

- a) Accretive's ideas and commitments to a long term partnership in helping VCPUSD achieve its goals;
- b) Future student attendance projections;
- c) Preference towards enrollment increases or decreases;

2. A possible school mitigation agreement (SMA) to include:

- a) Attendance boundaries and the coordination of proposed project boundaries;
- b) Student generation;
- c) A potential onsite school facility and opening schedule;
- d) Funding for school construction - without using District funds (and no General Obligation Bonds);
- e) Funding for school operation – If opened prior to break even based on ADA funding formula;
- f) Transportation to and from any offsite schools;
- g) Other

3. Coordination with Bonsall and Fallbrook Districts

- a) How to allow children in the same grade level within our community, to attend the same

schools;

b) Opportunities relative to Bonsall Sullivan Middle School (2.3 miles from the project);

4. Next Steps

We are certainly happy to approach this any way that you feel most comfortable.

Jon Rilling

The Accretive Group of Companies

Email: Jon@accretive-group.com

Website: www.accretive-group.com <<http://www.accretive-group.com>>

12275 El Camino Real, Ste. 110

San Diego, CA 92130

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From: Lou Obermeyer [<mailto:obermeyer.lo@vcpusd.k12.ca.us>]

Sent: Monday, August 23, 2010 3:40 PM

To: Jon Rilling

Cc: Lou Obermeyer

Subject: RE: Following Up

Hi Jon,

I told you I'd let you know when I received additional information or clarification from Mark Slovick. He called last week and said that the Planning Commission didn't say that the developers had to meet with any agencies such as the school district regarding facilities. However, when you have information about how you plan to fund school facilities in your project, other than a general obligation bond, please send the information to me and we can schedule time to review your ideas.

Lou

From: Jon Rilling [mailto:jon@accretive-group.com]
Sent: Monday, August 23, 2010 11:03 AM
To: Lou Obermeyer
Subject: RE: Following Up

Thanks Lou.

Jon Rilling
The Accretive Group of Companies
Email: Jon@accretive-group.com
Website: www.accretive-group.com <<http://www.accretive-group.com>>

12275 El Camino Real, Ste. 110
San Diego, CA 92130

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From: Lou Obermeyer [mailto:obermeyer.lo@vcpusd.k12.ca.us]

Sent: Monday, August 16, 2010 11:32 AM
To: Jon Rilling
Cc: Lou Obermeyer
Subject: RE: Following Up

Hi Jon,

I've been in contact with Mark Slovick, Project Manager with the county in an effort to clarify what the commission has requested. He will let me know in the next few weeks what the next steps are regarding the Planning Commission's request and whether or not a meeting with you is needed or appropriate at this time.

Lou

From: Jon Rilling [mailto:jon@accretive-group.com]
Sent: Wednesday, August 11, 2010 3:23 PM
To: Lou Obermeyer
Subject: Following Up

Dear Lou,

As I'm sure you are aware, the Planning Commission voted 5-1 to continue our project hearing until after the County-wide General Plan Update is heard by the Board of Supervisors in October. In addition, the Planning Commission recommended that we work with County Staff, the Community and the various Districts (School, Water, Sewer, etc) to study the technical feasibility of our concept. This type of study/analysis typically takes place after the PAA application is authorized, however the Commission sought more information and directed us to bring back technical details and answers.

I know that your super busy with getting school going, but I would like to see if there is any available time in your schedule over the next few weeks to have a follow-up meeting to discuss our project and the direction of the Planning Commission. I think it would be very beneficial for both of us to reconnect and outline how we can help support your district's goals while we plan for our future in the community.

Thanks,

Jon Rilling
The Accretive Group of Companies

Email: Jon@accretive-group.com

Website: www.accretive-group.com <<http://www.accretive-group.com>>

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Subject: Re: response to PC letter

Date: Monday, December 6, 2010 3:20 PM

From: Lou Obermeyer <obermeyer.lo@vcpusd.net>

To: Randy Goodson <randy@accretive-group.com>

Dear Mr. Goodson,

Thank you for your communication. To clarify, this is the first time you have said that Accretive will pay for or build a school. Contrary to your email below, you did propose a general obligation bond when we met. Also, this is the first time you have mentioned or offered to pay for student transportation. It would be helpful to know what regulation(s) you cited when you said at the public hearing, "...they're not allowed to stop more than 30 times ..." referring to school busses.

Lou Obermeyer

On 12/6/10 2:29 PM, "Randy Goodson" <randy@accretive-group.com> wrote:

Dear Dr. Obermeyer,

I have reviewed the letter that you sent to the County Planning Commission dated November 29, 2010 regarding PAA 09-007 that would allow my company the ability to submit a detailed application for a development project. Let me recap what we discussed in person and have reiterated in our subsequent correspondence:

1. Accretive has offered to provide (pay for or build) a K-8 school to serve our future neighborhood. I understand it is not possible to begin discussions regarding a comprehensive mitigation agreement at this time but we are committed to reaching an acceptable comprehensive mitigation agreement with Valley Center-Pauma Unified School District and any other affected districts. This agreement would provide mitigation for student impacts from our future neighborhood well in excess of the payments mandated by State Law.
2. Accretive has never proposed, nor utilized, a General Obligation Bond of any kind to fund school improvements or pay school mitigation fees for any project we have developed. As we have committed many times, we will not seek nor utilize a General Obligation Bond for this project. I understand and agree with your assessment regarding the unavailability of state construction funds and agree that funding will likely come from additional developer fees.

3. Accretive will work with all school districts to provide, pay for, and/or operate necessary transportation between offsite schools and our future neighborhood.

In closing, we recognize the difficulty in dealing with these issues prior to a development application being filed. There are many project details that have not been defined until after the approval of a PAA and the submittal of the General Plan Amendment application. To be clear, we have not even completed a project design and do not have student generation calculations or a facility needs assessment. I understand that you do not want to meet to further discuss the project and potential mitigation solutions at this time and remain available should you change your mind.

I look forward to having a constructive working relationship based upon the "*Values & Beliefs*" of the District that we also share.

Sincerely,

R. Randy Goodson
CEO
Accretive Investments, Inc.

12275 El Camino Real, suite 110
San Diego, CA 92130
Office: 858-546-0700 x133
Direct: 858-345-3643
Fax: 858-546-0770

Subject: following up

Date: Friday, December 10, 2010 1:35 PM

From: Randy Goodson <randy@accretive-group.com>

To: Lou Obermeyer <obermeyer.lo@vcpusd.net>

Cc: Jon Rilling <jon@accretive-group.com>

Dear Dr. Obermeyer,

I really look forward to a time when we can work together constructively to provide the best future for the students of your District. Further, I truly regret that it has taken us so long to get on the same page.

However, I'm glad we're now on the same page then. Prior to the approval of a PAA we will not have a land design or student generation calculations, but we're ready to meet when you feel it is appropriate.

As for your transportation question, that number was derived from my experience with school districts and discussions with our traffic engineer, but I did not intend it to be viewed as a regulation or specific to your school district. Further, I did not intend nor expect to offend the District by my comments relating to school buses making more than 30 stops. The basis is that many districts wish to limit school bus trips to one hour and also estimate the cycle time for a pick-up or drop-off of a student rider to 2 minutes each. Therefore, a bus that stops 30 times will have spent one hour ($30 * 2 \text{ minutes} = 60 \text{ minutes}$) on stops without any additional travel time. As I said in my previous email, Accretive will work with all school districts to provide, pay for, and/or operate necessary transportation between offsite schools and our future neighborhood so that the total bus trip is limited as closely as possible to the 30 minute travel time from our neighborhood location to your High School.

Thank you for your time and attention.

Randy Goodson

Information from ESET NOD32 Antivirus, version of virus signature database 5693
(20101210)

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>



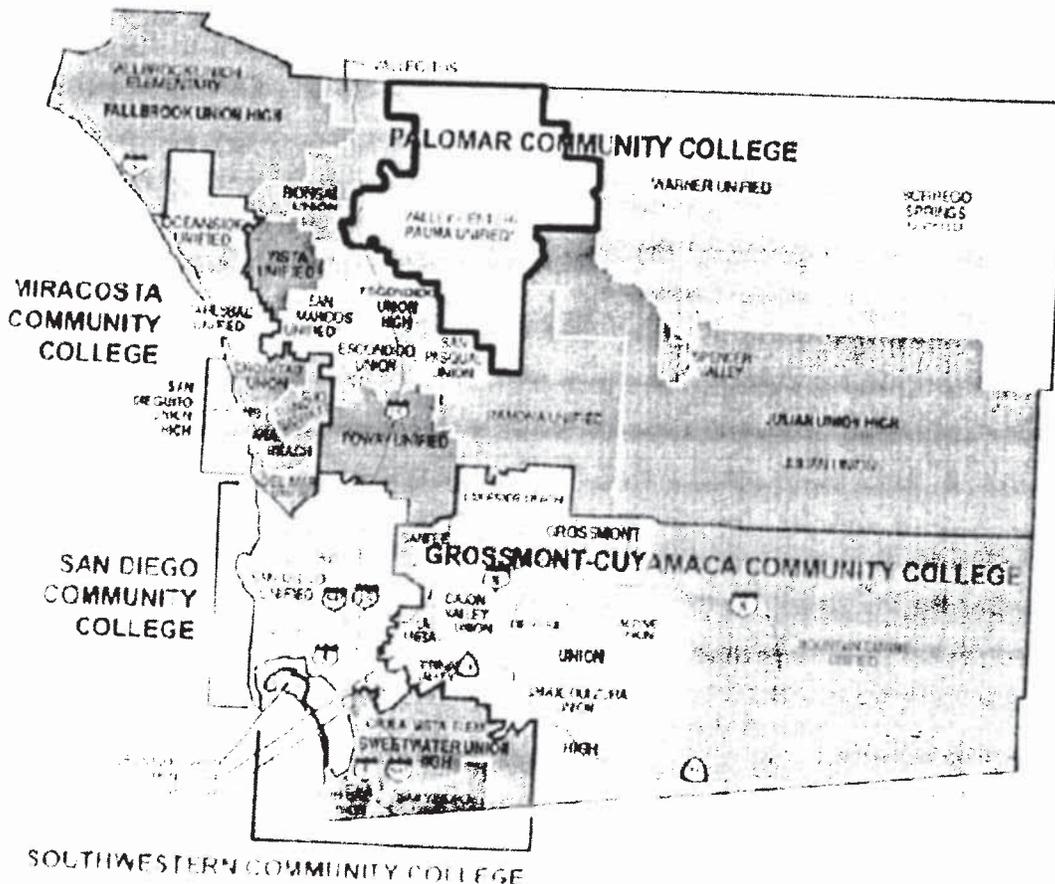
February 28, 2011

Mr. Eric Gibson
Director, County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Valley Center Pauma Unified School District Response to I-15/395 Master Planned Community Major Pre-Application: Case Number 3992-10-025 MPA Accretive Investments, Inc.

Dear Mr. Gibson:

Thank you for the pre-application summary of the I-15/395 Master Planned Community that is proposed by Accretive Investments, Inc. Valley Center Pauma Unified School District is responsible for the education of children in grades kindergarten through twelfth grade. We also educate pre-school, continuation high school, and special education students. The diagram below shows the location of the District within San Diego County.



11

Superintendent _____
Board of Trustees _____

The proposed project is located within the Valley Center Pauma Unified School District's attendance area. According to the pre-application summary it may also lie within the Bonsall and the Fallbrook Union High School districts. Therefore, the proposal must clearly identify how much of the planned community will lie within Valley Center Pauma's District boundaries. It must also show the proposed land uses so that the District's planners can identify what the impact to schools will be.

Lilac School, a Kindergarten through Fifth grade school, is closest to the proposed development; Valley Center Middle School serves grades six through eight, and Valley Center High School educates high school students in grades 9 through twelve. Without specific information on the number and type of housing that is in the project, we can't determine the impact to the capacity at these schools. What we can say is that 1,746 new dwellings will most likely result in over 800 new students requiring classroom space.

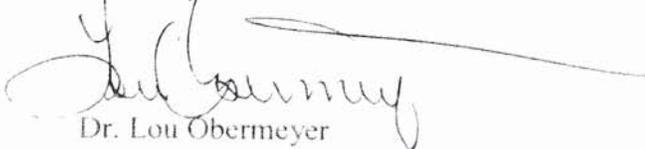
In reading the pre-application summary it is clear that the applicant is contemplating providing a new school. A great deal of planning and coordination with state and local entities are required before a new school site is constructed. In addition to the District's input, communication from local fire fighting, law enforcement and parents will be solicited. On the state level, the California Department of Education's School Facilities Planning Division will need to be involved in reviewing and approving the site. The Department of Toxic Substance Control will also be required to give its approval of the site.

The Valley Center Pauma Unified School District insists that the applicant fully mitigate the cost for land acquisition, professional services required for planning, designing and obtaining state approvals, and the cost for construction. Options for mitigation can be discussed when the project is more refined.

At this point in time the District cannot support the proposal until more land use detail and a location map that clearly shows the percentage of the project that is within the Valley Center Pauma boundaries is provided.

I look forward to a response to this letter.

Sincerely,

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

Dr. Lou Obermeyer
Superintendent, Valley Center Pauma Unified School District

c: Joanne Branch, San Diego County Office of Education
LO/ts/jb



March 25, 2011

Mr. Goodson
The Accretive Group of Companies
12275 El Camino Real, Suite 110
San Diego, CA 92130

Dear Mr. Goodson:

In your email to me dated December 6, 2010, you said that you were committed to reaching a comprehensive mitigation agreement with our district regarding your development. The Valley Center-Pauma USD has retained Mr. Adam Bauer, Fieldman, Rolapp & Associates, to represent us in the development of a comprehensive mitigation agreement. Please contact Mr. Bauer at your earliest convenience to schedule a meeting. Mr. Bauer can be reached at 949-660-7303.

Sincerely,

Dr. Lou Obermeyer
Superintendent

cc: Adam Bauer, Fieldman, Rolapp & Associates
Joanne Branch, San Diego County Office of Education
Oliver Smith, Valley Center Planning Committee
Mark Slovic, San Diego County Department of Planning and Land Use



July 25, 2012

Mr. Eric Gibson
Director, County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

RE: Valley Center-Pauma Unified School District Response to
Notice of Preparation of an Environmental Impact Report for the Lilac Hills Ranch
Master Planned Community

Dear Mr. Gibson:

In response to the Notice of Preparation of an Environmental Impact Report for the Lilac Hills Ranch Master Planned Community, the Valley Center-Pauma Unified School District, as the education agency responsible for providing K through Grade 12 education, is strongly opposed to the project for the following reasons:

1. The proposal is for a maximum of 1,745 dwelling units.
 $1,745 \times .5$ (factor from California Department of Education-CDE) = **873 Elementary School Students** – potentially 2 elementary schools or one very large campus. Please see the Site Development Guidelines from CDE:
<http://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>

At $1,745 \times .2 =$ **349 High School Students** – possibly 1 small high school, or growth and impact mitigation at existing high school campuses, including at least 9 new classrooms, increases to administration, additional physical education space, and other minimum essential facilities and parking mitigation. Growth at the existing high school may require land acquisition. Please see the Site Development Guidelines from CDE:
<http://www.cde.ca.gov/ls/fa/sf/guideschoolsite.asp>

The locations of the sites must be contingent on CDE approval and take into consideration the requirements of Title 5, Code of Regulations:
<http://www.cde.ca.gov/ls/fa/sf/title5regs.asp>

Superintendent
Dr. Lou Obermeyer

Board of Trustees
Karen J. Burstein

Lori A. Johnson
Donald L. Martin

Barbara P. Rohrer
Mavany Calac Verdugo

Mr. Gibson, DPLU

July 25, 2012

Page Two

2. School site development must include all associated onsite and offsite environmental mitigations, storm water compliance, traffic mitigation, and similar development issues. Please note in the Initial Study on:
 - A. Page 6: I. Aesthetics a), b), c), d) all show Potential Significant Impacts
 - B. Page 21: VII. Hazard and Hazardous Materials show a) and b) Potential Significant Impacts
 - C. Page 35: XIV. Public Services shows Potential Significant Impacts

The District wants the EIR to review the impact to be able to bring levels of impact on the above to "less than significant" levels.

We would like to add that the project's land use plan should include a prospective location for the new facilities. The location should be where the District wants it and not the developer.

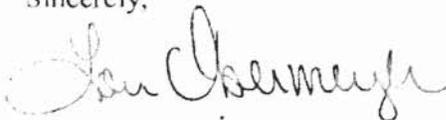
This project appears to possibly be in the Bonsall Union School District as well. We hope you are also requesting their input.

In addition to our concerns listed above, we are including communications from 2009 to 2011 that the District has had with the Developer and the DPLU in regards to potential impacts and issues.

At this time the District cannot support the project proposal until a comprehensive mitigation agreement can be reached. The district is open to further discussions with the developer so that appropriate school facilities will be available for students as the homes are developed.

Please contact us if you have need for further response.

Sincerely,



Dr. Lou Obermeyer
Superintendent
Valley Center-Pauma Unified School District



**COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
PROJECT FACILITY AVAILABILITY FORM, School**

Please type or use pen
(Two forms are needed if project is to be served by separate school districts)

Owner's Name: Accetive Investments Inc. Phone: (619) 546-0700

Owner's Mailing Address: 12775 El Camino Real, Suite 110 Street

City: San Diego State: CA Zip: 92130

ORG: _____ ACCT: _____ ACT: _____ TASK: _____ DATE: _____

Sc

ELEMENTARY: _____ HIGH SCHOOL: _____ UNIFIED: _____

SECTION 1. PROJECT DESCRIPTION DISTRICT CASHIER'S USE ONLY
TO BE COMPLETED BY APPLICANT

- A LEGISLATIVE ACT**
 Rezones changing Use Regulations or Development Regulations
 General Plan Amendment
 Specific Plan
 Specific Plan Amendment
- B DEVELOPMENT PROJECT**
 Rezones changing Special Area or Neighborhood Regulations
 Major Subdivision (TM)
 Minor Subdivision (TPM)
 Boundary Adjustment
 Major Use Permit (MUP), purpose: _____
 Time Extension... Case No. _____
 Expired Map... Case No. _____
 Other _____
- C**
 Residential Total number of dwelling units 1,746 max.
 Commercial Gross floor area _____
 Industrial Gross floor area _____
 Other Gross floor area _____
- D** Total Project acreage _____ Total number lots 1,746 du max.

Assessor's Parcel Number(s)
(Add extra if necessary)

<u>numerous - refer to PAs exhibit -</u>	
<u>may include additional property</u>	

Thomas Bros. Page 1069/1079 Grid B1, C1, B2, C2, C3
NW corner of Valley Center
 Project address _____ Street _____
Valley Center 92026
 Community Planning Area/Subregion _____ Zip _____

Applicant's Signature: _____ Date: _____
 Address: _____ Phone: _____
 (On completion of above, present to the district that provides school protection to complete Section 2 below.)

SECTION 2: FACILITY AVAILABILITY TO BE COMPLETED BY DISTRICT

District Name: Valley Center-Pauma USD If not in a unified district, which elementary or high school district must also fill out a form?

Indicate the location and distance of proposed schools of attendance: Elementary: **VC Upper Elem. miles 11.8
 Junior/Middle: VC Middle miles 14.8 High school: VC High School miles 14.9

- This project will result in the overcrowding of the elementary junior/school high school. (Check)
- Fees will be levied or land will be dedicated in accordance with Education Code Section 17620 prior to the issuance of building permits.
- Project is located entirely within the district and is eligible for service.
- The project is not located entirely within the district and a potential boundary issue may exist with the Bonsall school district. It is our understanding that this project is also in the Bonsall School District.

Authorized signature: [Signature] Print name: Dr. Lou Obermeyer
 Superintendent _____ Phone: 760-749-0464
 Print title _____

On completion of Section 2 by the district, applicant is to submit this form with application to:
 Zoning Counter, Department of Planning and Land Use, 5201 Ruffin Road, San Diego, CA 92123



**Valley Center Elementary Upper School is closed at the present time. We would have to re-open the school. The closest school site to this area is Lilac School and it would be impacted.