

Valley Center Community Planning Group

PO Box 127 Valley Center CA 92082

13 August 2013



Oliver Smith
Chair

oliver.smith@philips.com

Ann Quinley
Vice Chair

annquinley@gmail.com

Steve Hutchison
Secretary

hutchisonsm@gmail.com

Hans Britsch

thomas@westerncactus.com

Bret Davis

bret_davis@hotmail.com

Robert Davis

bob@bobdavisrealty.com

Paul Evans

gentleman_programmer@hotmail.com

Bob Franck

Franckfort@yahoo.com

Larry Glavinic

larryglavinic@gmail.com

Mark Jackson

jacksonmark92026@gmail.com

Eric Laventure

mxinmotion@gmail.com

LaVonne Norwood-Johnson

lavonne@armorfabrication.com

Rich Rudolf

richrudolf@sbcglobal.net

Jon Vick

JonVick2@aol.com

(One Opening)

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

Re: 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)

Dear Mr. Slovick:

Attached is a compendium of responses to the Lilac Hills Ranch Draft
Environmental Impact Report from the Valley Center Community
Planning Group. I am attaching a list of the documents within the
compendium for your convenience. Please review and respond to
these comments.

- 1) Executive Summary
- 2) General Plan Consistency
- 3) Growth Assessment Valley Center / Bonsall
- 4) Project Objectives
- 5) Bus Route 388/389 [attachment]
- 6) Biological Resources
- 7) Cultural Resources
- 8) Hazards, Hazardous Materials, Wildfires
- 9) Fire & Evacuation
 - Attachment A – Deer Springs Fire Protection District
 - Attachment B – Deer Springs Fire Protection District
 - Attachment C – Deer Springs Fire Protection District
 - Attachment D – September 12 and 13, 2012 RFEFRS Mountain
Ridge Design Speed and Road
 - Attachment E – LHR TM 5571 – Sight Distance Analysis at Circle
R Drive and Mtn Ridge Rd
 - Attachment F – LHR TM 5571 – Sight Distance Analysis at West
Lilac Road and Covey Lane
 - Attachment G – Figure 27-1 Project Gated Access
 - Attachment H – Figure 1.6 from Chapter 1 – LHR DEIR

10) Irreversible Impacts

11) Geology

12) Waste Water and Water Quality Concerns

Attachment A – Valley Center Municipal Water District, 8 July 2013

Attachment B – Pre-development Agreement VCMWD/Accretive Investments Inc.

Attachment C – Excerpt San Diego County Consolidated Fire Code

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

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

13) Public Services

BSD Review of Lilac Hills Ranch DEIR

DSFD review of Lilac Hills Ranch DEIR

SD County Library Review of Lilac Hills Ranch DEIR

VCPUSD Review of Lilac Hills Ranch DEIR

SD Sheriff's review of Lilac Hills Ranch DEIR

14) Project Alternatives

Attachment A – EIR Project Objectives

Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives

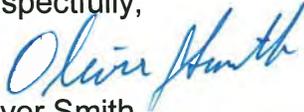
Attachment C – 1251 EDU Reduced Footprint Map

Attachment D – 881 EDU Reduced Intensity Map

Attachment E – 1351 EDU 2.2 C Hybrid Map

15) Specific Plan

Respectfully,



Oliver Smith

Chair, Valley Center Community Planning Group

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)

Executive Summary: Lilac Hills Ranch DEIR Responses

A. Introduction

This Executive Summary is intended to aid reviewers of the comments on the Lilac Hills Ranch Draft Environmental Impact Report [DEIR] submitted by the Valley Center Community Planning Group. The review of the DEIR prepared by the County Department of Planning and Development Services, the Lilac Hills Ranch Specific Plan prepared by the applicant, and many technical reports that are the basis of the DEIR prepared by various consultants, has generated a significant volume of comments. The thousands of pages that make up the DEIR documents and their sometimes very technical nature made it difficult for volunteers to review and respond to every item in the relatively short time allowed. However, the principle issues are addressed in some detail in the responses that accompany this summary.

This summary does not substitute for the detailed comments and analyses presented in the attached comment documents.

B. Chapter 1

1. Project Objectives – The following excerpt from the DEIR summarizes the Project Objectives:

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

The proposed project is based on a wide range of reports that studied the different constraints and opportunities involving the project in concert with the County of San Diego and local community issues. The general components of the proposed project were determined using the project objectives described below.

- 1. 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.*
- 2. 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.*
- 3. 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.

- 4. Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.*
- 5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.*
- 6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.*
- 7. Provide the opportunity for residents to increase the recycling of waste.*
- 8. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.*

The County has structured the Objectives of the EIR, in aggregate, so narrowly that only the Lilac Hills Ranch Project, as proposed by the applicant, can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. The VCCPG response takes exception to the implied claims that the Project meets all of its own objectives and suggests that other alternatives to the proposed Project may fit the objectives better.

Objective One

The County has structured Objective One of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Two

The Project does not meet its own objective for Objective Two.

Objective Three

We do not have any issues with this objective other than to state that any Project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Four

The Project does not meet its own objective for Objective Four.

Objective Five

We do not have any issues with this Objective other than to state that any project required to have a Discretionary Permit approved would have to comply with this objective.

Objective Six

The County has structured the sixth Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill this Project Objective, leading to a self-serving and biased environmental analysis.

Objective Seven

Any Project Alternative would comply with this Objective equally.

Objective Eight

This objective is subjective and could be met by developing the Project at General Plan densities, which would preserve existing agricultural businesses and residential-based businesses.

2. Project Inconsistencies with Regional and General Plans

In comments submitted over the last year, the Valley Center Planning Group and the Valley Center Design Review Board have challenged the proponent's assertions that this SP/GPA is consistent with the adopted County General Plan [GP], or with Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.

Our previous comments, which are attached, have also challenged the logic exhibited throughout Accretive Investment Group's Specific Plan and now in their Draft Environmental Impact Report (DEIR): that amending a particular GP Regional Category to suit the project somehow also reconciles the project's inconsistencies with a wide array of General and Community Plan Goals and Policies.

The proposed SP/GPA is inconsistent in broad and fundamental ways with the San Diego County General Plan and Community Plans of both Bonsall and Valley Center. Further, the DEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences as CEQA requires. The DEIR is derelict in concluding as it does that: "Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant" (Chapter 3 Environmental Effects Found Not To Be Significant (p 3-65).

This DEIR fails to perform the analyses required for decision makers, first, to understand the parameters of this proposal, and, second, to appreciate the nature and reach of its impacts. The DEIR does not even have a rudimentary analysis of Consistency with the General Plan.

Internal consistency is required of all County General Plans by California State Law. Therefore, in considering a Specific Plan, particularly one that requires amendments to an adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designations and road classifications, principles, elements, goals and policies.

A Specific Plan is an implementation vehicle. Approval requires compliance with CEQA; consistency as well with the web of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific

Plan – the tail wagging the dog. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the August 3, 2011 San Diego County General Plan would require revisiting the Environmental Impact of the San Diego County General Plan and likely invalidates the San Diego County General Plan. Broad and fundamental amendments to adopted General and Community plans would require countywide environmental review.

We all can understand why the applicants might want to avoid disclosing the array of GP and CP Goals and Policies that this project violates. But CEQA's purpose is not to gloss over or obscure inconsistencies in order to ease approval of this project. CEQA's purpose is disclosure. Therefore, the DEIR for this SP/GPA must reckon specifically and individually with the General Plan Vision and Guiding Principles and the reflection of these in the Community Development Model, as well as with Goals and Policies across the GP's seven elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety and Noise; as well as goals and policies of the Bonsall and Valley Center Community Plans.

Once inconsistencies are disclosed there are only three ways to resolve them: reject the project, re-design the project, or re-build the County General Plan to suit these applicants. Inconsistencies with General and Community Plans, Design Guidelines and other ordinances and policies are NOT subordinate to this project's Specific Plan, as the Specific Plan asserts.

The full text of the General Plan and Community Plan Inconsistencies comments does an exhaustive analysis of several of the General Plan and Community Plan goals and policies to reveal the inadequacies of the proposed Project and the premise being advanced to allow its approval.

C. Chapter 2

1. Biological Resources

The DEIR cites three sensitive plant species observed on the Project site as well as observations of 13 Group 1 animal species ranging from lizards, snakes and jackrabbits to raptors, passerine birds and mule deer. Beyond the cited plants and animals, the DEIR notes the projected significant loss of several native plant habitats with special importance for the cited animal species and others such as mixed southern chaparral and coastal sage scrub.

The DEIR indicates that these significant losses can be mitigated off-site through the purchase of land within the draft PAMA based on a formula developed by the County. However, the DEIR does not account for the loss of 608-acres of raptor foraging area, which includes both natural vegetation formations and agricultural lands. The proposal is to set aside 77-acres off-site for raptor foraging calculated using the losses of sensitive native vegetation. It does not include in that calculation the lost agricultural land foraging area.

The DEIR suggests that the impacts to the three sensitive plants and 13 sensitive animals [and we assume the resident plants and animals not judged to be sensitive] are less than significant once mitigated, saying that none of the cited species represent significant populations or significant portions of regional populations. And yet, the DEIR and Biological Resources Report offer no data to support those claims. Nor, do they offer data that show the local population densities of the cited species that can be compared to regional population densities.

The DEIR notes that the riparian habitats on the Project site will be preserved in open space easements. Those portions of the riparian habitats destroyed by road crossings will be recreated on-site adjacent to the preserved existing habitats. However, the DEIR gives short shrift to the edge effects it acknowledges [e.g. human intrusion, invasive plant species, domestic pets, noise, night light, etc.] pointing to fences and signage and weeding efforts managed by an undetermined manager.

The DEIR does not adequately account for the cumulative effects stemming from the impacts to the Project site. If we take San Diego County as the 'region' or even North San Diego County as the region, we should be looking at the historic extent of coastal sage scrub, southern mixed chaparral, southern coast live oak riparian woodland, coast live oak woodland, southern willow scrub, southern willow riparian woodland, and wetlands within that area compared to what exists today. We should then ask to what extent have these vegetation communities been extirpated and to what extent the remaining examples of those communities have significance. Comparing proposed destruction in one project with destruction that has or will result in a handful of other smaller projects isn't an effective measurement of cumulative effects.

2. Cultural Resources

The DEIR and Cultural Resources Report address historic cultural sites on the Project site individually. They fail to regard the Project site overall in the context of nearby significant Native American village sites along the San Luis Rey River and its tributary, Moosa Creek. The Project site is rich with artifacts and occupation sites, but the proposed mitigation and preservation procedures appear to be piecemeal for a Project as large and transformative as this one.

The grading, by cut and fill techniques, of 4-million cubic yards of earth will jeopardize the opportunity for future study and appreciation of the basic integrity of the cultural significance of the larger area. There are suggestions in previous studies that an as yet undiscovered earlier human habitation of the Project site area, or a separate village from those already known may be present.

There are also concerns about the data recovery program and its methodology. Most of the previous studies of the area are 35 years old and more current studies may be needed to fully understand the significance of the site.

3. Hazards, Hazardous Materials, Wildfires

The development of the densely packed Project adjacent to agricultural areas presents the need to buffer those agricultural areas from the development and its sensitive receptors [schools, churches, senior centers, parks, homes]. However, there is no discussion in this subchapter of General Plan policy S-11.5, which requires development adjacent to agricultural operations in Semi-rural and Rural lands to adequately buffer agricultural areas and ensure compliance with relevant safety and codes where hazardous materials are used.

The proposed wastewater recycling facility [WRF] will be using hazardous materials, such as chlorine, in its treatment process. The facility is only 686-feet from the proposed school site and only 250-feet from homes. Considering that there was a recent accidental spill of hazardous materials from a similar facility in Escondido, the conclusion that the risks from the use of toxic, hazardous materials are less than significant is overly optimistic, even under carefully controlled circumstances.

The WRF will not be built to coincide with the earlier phases, requiring that sewage is trucked off-site for disposal. The same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project? Other potential issues are accidental sewage or sludge spills, not to mention the impact those frequent truck trips have on the traffic flow to and from the Project.

The issues of emergency response and evacuation plans are troublesome for this Project. The Evacuation Plan does not address the most fundamental evacuation issue of the proposed Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed Project. The mobility element roads nearest the Project are West Lilac and Circle R Roads. Both roads were built as 2.2 E two-lane roads to serve a rural community with small, rural populations and the applicant plans no upgrades to these roads. The addition of 5000+ people at the Project site will severely impact both emergency response and evacuation during a crisis event, exacerbating already congested conditions in such circumstances and putting many people at risk.

The applicant would further impact evacuation plans by proposing 10 road standard modifications that would lower the classification of the mobility element roads in some cases and lower the design speeds of those roads. With lower design speeds and narrower roadways, the Project will imperil evacuations from Bonsall and Valley Center to the I-15 corridor by existing residents, and impede the prospective residents of the Project at the same time. This kind of impact, played out in scenarios like Bonsall and Valley Center experienced in 2003 and 2007, would severely and significantly put hundreds of people at risk. Further, the 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. There are no plans to upgrade this road. If an evacuation event is caused by a large wildfire from the west, the ensuing smoke plume will result in a panic evacuation over a single treacherous road.

The Project has not demonstrated that the project can meet the 5-minute Emergency Response requirement for Fire Services. The proposed solutions of building a fourth fire station in the Deer Springs Fire Protection District [DSFPD] at the Project site do not work from the perspective of jurisdictional issues and fiscal operational cost issues. None of the existing fire stations in the DSFPD meet the 5-minute requirement.

The Project is proposed for a site in a very high fire hazard severity zone [FHSZ]. Locating a Project of this size and scope in a very high FHSZ is not a smart location that is consistent with preventive land use planning. The DEIR states that failure to meet the standard 100-foot Fuel Modification Zone [FMZ] for significant portions of the Project would be a significant impact. . 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. This is a severe design flaw.

Fire Protection Plan (FPP)

The proposed 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 either Structure Fires or Emergency Medical Service (EMS).
4. The FPP doesn't adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.

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.

Thus, the proposal amounts to putting a large project with several vulnerable populations into a very high fire hazard severity zone with substandard fuel modification zones and depending on more rigorous construction techniques to restore a margin of fire safety. The question becomes why the applicant hasn't redesigned the Project to allow for standard FMZs throughout the Project? This problem is strained further by uncertain access to the Project site by fire apparatus. That access depends on at least two private roads, for which easement access is uncertain, and the applicant's proposal to gate those access points. These constraints on access are problematic for fire safety and evacuation efficiency.

4. Significant Irreversible Environmental Changes Resultant from Project Implementation

The proposed Project [Lilac Hills Ranch] will cause significant, irreversible, and, in most instances, immitigable impacts to the Project site, to the Valley Center and Bonsall communities and their community plans and to the County of San Diego and its General Plan. The Project will require amendments to the General Plan, its principles, policies, and regional land use designations and to the Bonsall and Valley Center Community Plans, or, at least, a severely disfigured interpretation of all of them.

The DEIR focuses on the grading of the Project site, on the use of fuels [energy] to prepare the Project site and manufacture construction materials, on the consumption of construction materials [wood, concrete, asphalt, drywall, etc.], on subsequent energy and natural resource consumption by the eventual residents, and on the amount of time to construct the project.

The movement of over 4-million cubic yards of dirt and rock on the Project site is perhaps the most obvious irreversible impact. Another is the loss of hundreds of acres of productive agricultural land. Another is the loss of significant amounts of biological habitat and the flora and fauna that presently occupy them. The DEIR does not adequately address the cumulative impact of scores of such individual losses caused by multiple projects within the County and the irreversible loss of the majority of native habitats in the aggregation of those individual losses.

Less obvious losses are the changes to the General Plan and related Community Plans that will be required for this Project to be approved. Those changes will dramatically alter the parameters of the General Plan that strive for smart growth. And, if the Project is approved, it will set a precedent that will have severe ramifications across the unincorporated countryside of San Diego County.

D. Chapter 3

1. Water Quality/Hydrology

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 immitigable impacts.

Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements as represented in figure 3-4, “Off-site Sewer Collection System.” This determination is confirmed by Valley Center Municipal Water District [VCMWD] in a letter labeled Attachment A. This finding makes construction of sewer and recycled water pipelines for the Project problematic.

Use of the Lower Moosa Water Reclamation Facility [LMWRF] for a series of alternative sewage solutions has been proposed. The LMWRF was built in 1974 and provides disinfected secondary treatment of reclaimed water only. It has been approved by two agencies to double the LMWRF capacity to 1.0 million gallons/day [MGD] of influent. That capacity is not presently added.

If eventually expanded, likely it would be required to upgrade its treatment to tertiary standards to allow beneficial use of the recycled water on landscaping and golf courses and to prevent degrading the water quality of the San Luis Rey Basin watershed. Current capacity of the LMWRF is 0.5 MGD and it is currently averaging 0.35 MGD of influent. The present ground water percolation pond capacity is 0.44 MGD. At present capacities, LMWRF could accept a maximum of 450 additional equivalent dwelling units [EDU]. However there is some question whether the capacity of the percolation ponds would be allowed to reach the 0.44 MGD limit. Several already pending permit applications, which could reduce the 450 additional EDUs, further complicate matters. Delays for permitting and construction could make the capacity improvements unavailable for some time. Another factor is the limited available space at LMWRF for the expansion.

Analysis of tabular data from the Waste Water Management of Alternatives Study [table 5-1] calls into question the availability of adequate acreage to discharge recycled water beneficially on-site.

It appears that the Hydro Modification Design is relying on exaggerated assumptions for both rainwater harvesting success and the availability of residential landscape areas as permeable surfaces for absorption of water. That same design also reveals the desire to install 23 acres of private roads paved with permeable pavers to permit additional percolation of water into the soil. Such roads may fail under the weight of a Type 1 fire engine.

It is tortured logic to argue that taking green field 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 policy COS-5.2 which requires development to minimize the use of impervious surfaces.

2. Public Services

We are informed that several local public service organizations will be responding to the DEIR within the scope of their responsibility to provide such services. We have spoken to the Valley Center Municipal Water District, Valley Center Pauma Unified School District, Deer Springs Fire Protection District, the San Diego County Sheriff's Department, the Regional Water Quality Control Board, the California Department of Fish and Wildlife, and the U. S. Fish and Wildlife Service. [Five emails to/from agencies are attached]

3. Geology and Supplemental Geology Report

The review identifies questions regarding the need for blasting that cannot be quantified to determine the amount and length of time needed to do removals and ultimately placement of fills. Silicates will be a potential hazard relative to the AQMD standards.

Slope Stability and Remediation describe cut slopes 6.2.1 and fill (manufactured) slopes 6.2.2 in excess of seventy-feet (70-feet) in height. There are no seventy-foot high manufactured slopes existing in this community, which makes these proposed slopes out of character with the community.

E. Chapter 4 – Project Alternatives

The Lilac Hills Ranch Project Alternatives from Chapter 4.0 of the DEIR are below:

1. No Project/No Development Alternative
2. No Project / Existing Legal Lot Alternative (49 EDU + no commercial)
3. General Plan Consistent Alternative (110 EDU + no commercial)
4. Reduced Footprint Alternative (1251 EDU + 6 acres of commercial)
5. Reduced Intensity Alternative (881 EDU + 5.6 acres of commercial)
6. 2.2C (Hybrid) Alternative (1365 EDU + 15.3 acres of commercial)

The County's Project Alternatives Analysis in Chapter 4 of the DEIR is grossly defective in meeting CEQA requirements in five areas that are summarized below:

1. The DEIR Objectives against which the Alternatives are judged for Environmental Impacts are biased and should be changed to equitable objectives, from which compliance against can be fairly measured.
2. The Project does not meet its own Objectives, when fairly assessed.
3. There is a valid offsite alternative – the Downtown Escondido Specific Plan

- Area (SPA) that needs to be included as an Alternative.
4. The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives. These three “Alternatives” are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis. [see table 1]
 5. The Alternatives were not fairly assessed in the DEIR by the Applicant.
 6. When all eight Alternatives are fairly assessed, the Downtown Escondido SPA meets more Objectives than the Project or any Alternatives.

Table 1 -Scant Attributes of 3 Alternates Provided								
Land Use	Project		Reduced Footprint		Reduced Intensity		2.2 C (Hybrid)	
	Gross Acreage	Units/Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Gross Acreage	Units/Sq. Ft.
Single Family Detached	158.8	903	142.1	783	275.5	881	177.0	792
Single Family Senior	75.9	468	71.1	468	0		75.9	468
Single Family Attached	7.9	164	0		0		4.3	105
Commercial/Mixed Use	15.3	211	6.0		5.6		15.3	
Water Reclamation	2.4		2.4		2.4		2.4	
RF/Trailhead	0.6		0		0.6		0.6	
Detention Basin	9.4		5.4		5.5		5.5	
School Site	12.0		9.0		0		12.0	
Private Recreation	2.0		0		0		2.0	
Group Residential/Care	6.5		0		0		6.5	
Institutional	10.7		10.7		10.7		10.7	
Park - HOA	11.8		10.0		3.0		11.8	
Park - Dedicated to County	12.0		6.0		9.0		12.0	
Biological Open Space	103.6		168.8		102.7		103.6	
Non-circulating Road	45.7		45.7		41.5		43.1	
Circulating Road	37.6		37.6		21.5		30.0	
Common Areas/Agriculture	20.2		20.2		65.0		45.0	
Manufactured Slopes	67.5		67.5		65.0		50.0	
Other/Accretive Math Error*	8.1		5.5		0		0.3	
Total	608.0	1746	608.0	1251	608.0	881	608.0	1365
sq. ft. = Square Feet	* Table 4-1 from DEIR Chapter 4 Project Alternatives has the indicated arithmetic errors							
HOA = Homeowner's Association								

Table 2, below, rates scoring of Alternatives against the Applicant’s biased eight Objectives.

TABLE 2 - COMPARISON TO PROJECT OBJECTIVES								
Objectives	Project	Alternates						
		Downtown Escondido SPA	No Project/No Development	No Project/Legal Lot	General Plan Consistent	Reduced Footprint	Reduced Intensity	2.2 C Hybrid
1 - 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	No	Yes	No	No	No	No	No	No
2 - 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	No	Yes	No	No	No	No	No	No
3 - 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	Yes	Yes	No	No	Yes	Yes	Yes	Yes
4 - Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff	No	Yes	No	No	No	No	No	No
5 - Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area	Yes	N/A	No	No	Yes	Yes	Yes	Yes
6 - Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing	Yes	Yes	No	No	No	No	No	Yes
7 - Provide the opportunity for residents to increase the recycling of waste	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
8 - Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Total Number of Objectives Met	5/8	7/8	2/8	2/8	4/8	4/8	4/8	5/8

Clearly, the least Environmental Impact, even to these biased Objectives, is shown in Table 2 to be the Downtown Escondido SPA Alternative.

More importantly, the General Plan alternative must be properly considered by the applicants and County, rather than focus their attention strictly within the boundaries of the Project. Apart from the time and money already spent developing the General Plan [12 years and \$19.6 million], it was designed as a plan for the entirety of the County's unincorporated area while being mindful of the incorporated cities as well. The Lilac Hills Ranch Project is only a single piece of a much larger puzzle.

To study this "puzzle piece" is NOT to study the General Plan alternative. This "half-study" misses the underlying logic of the new County General Plan which is, according to the lengthy introduction to the GP, to achieve "sustainable development" with a two-part strategy called Smart Growth.

- I. Part One: Direct new growth to areas where infrastructure already exists (such as the established Village in Valley Center's central valley).

II. Part Two: Retain agriculture and large parcels for functioning rural lands that clean the air, provide vital watersheds, and support diverse forms of wildlife among other functions.

The plan works ONLY when its two interdependent parts work together.

The Lilac Hills Ranch Project undermines both aspects of this strategy. The General Plan alternative implements both aspects of this strategy. The only acceptable “study” of the General Plan Alternative is to study it in its entirety. The superior solution will be clear.

F. Specific Plan

The comments on the Specific Plan include several major concerns:

1. The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and Bonsall and it is improperly located. Urban densities are incompatible with the rural, agricultural location in which the Project has been sited.
2. Roads and Traffic. The road standard modifications proposed by the Project will downgrade the classification of a mobility element road [West Lilac Road] and will lower the design speeds of several road segments, both public and private. At the same time the Project will add over 5000 people and approximately 20,000 average daily trips to those narrower, slower roads causing congestion and road failure.
3. Compliance with the General Plan. The Project’s Specific Plan threatens to overturn virtually every element in the County’s new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, nearly \$20 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will require damaging amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. If the Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.
4. Services and Infrastructure - Water, Schools, Fire, Waste Treatment-Infrastructure is expensive. Putting in new roads, adding additional lanes to a bridge, building a fire station, putting up a new school, installing sewer and

waste treatment plants and building trails all cost large amounts of money. A principal reason why the General Plan Update strongly favors “compact, town center developments” while stating that it intends to limit “growth in areas without adequate roads, water and sewer service” is because of the demands on the public purse for building and then maintaining these infrastructure items over and over.

The Project is seeking to build a city the size of Del Mar, CA that will require an almost entirely new infrastructure—new roads, schools, sewer systems and a broad range of other infrastructure items. These infrastructure expansions are why the Valley Center Community Plan designates the North and South villages at the core of Valley Center for such housing and commercial densities. The Community Development Model also directs that kind of concentration of density and infrastructure not at the outer edge of the community as this Project proposes, but at the Valley Center core.

5. LEED-ND/Sustainable and Walkable Community. This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “expected to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards.

The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Valley Center community, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Valley Center community and the zoning and land use patterns within Valley Center are consistent with that model. The same is true for the Bonsall community. The proposed addition of the LHR Project in the western portion of the Valley Center community flouts the intention of the Community Development Model by establishing high-density development away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.

6. Agriculture— The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by historical agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. Avocado,

citrus, cactus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building the Project at the planned site would greatly damage many currently productive and successful agricultural operations.

7. Twists of meaning and lack of clarity in the plan. One of the most difficult aspects of the Project's Specific Plan is the extent to which it makes misleading claims. They would have us believe that they are building a LEED-ND or equivalent development even though The Project violates nearly all LEED-ND standards for site selection and linkage; that adding 5,000 residents to a rural, agricultural area actually improves traffic over narrow, winding rural roads; that grading and moving 4-million cubic yards of earth (enough to build a path 4-feet wide around the equator of Earth) preserves natural resources and habitat for animals.

In addition, after criticizing three previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or an idea rather than a plan that defines their intentions.

There are many other concerns addressed in the Specific Plan comment document. They range from the size and type of parks in the Project to the Fire Protection Plan, from the Water Reclamation Facility to open space and conservation policies, from V and D special area regulations to circulation elements. There are too many to reasonably relate in this summary.

GENERAL PLAN INCONSISTENCY

Introduction:

In comments submitted over the last year, the Valley Center Planning Group and the Valley Center Design Review Board have challenged the proponent's assertions that this SP/GPA is consistent with the adopted County General Plan [GP], or with Valley Center's Community Plan [CP], or with Valley Center Design Guidelines.

Our previous comments, which are attached, have also challenged the logic exhibited throughout Accretive Investment Group's Specific Plan and now in their Draft Environmental Impact Report (DEIR): that amending a particular GP Regional Category to suit the project somehow also reconciles the project's inconsistencies with a wide array of General and Community Plan Goals and Policies.

The proposed SP/GPA is inconsistent in broad and fundamental ways with the San Diego County General Plan and Community Plans of both Bonsall and Valley Center. Further, the DEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences as CEQA requires. The DEIR is derelict in concluding as it does that: *"Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be less than significant"* (Chapter 3 Environmental Effects Found Not To Be Significant (p 3-65).

This DEIR fails to perform the analyses required for decision makers, first, to understand the parameters of this proposal, and, second, to appreciate the nature and reach of its impacts. The DEIR does not even have a rudimentary analysis of Consistency with the General Plan.

Internal consistency of all County General Plans in California is required by California State Law. Therefore, in considering a Specific Plan, particularly one that requires amendments to an adopted General Plan, it is crucial to understand exactly where the Specific Plan is inconsistent with General Plan regional categories, land use designations and road classifications, principles, elements, goals and policies.

A Specific Plan is an implementation vehicle. Approval requires compliance with CEQA; consistency as well with the web of interconnected and mutually-supporting elements of the County General Plan, and consistency with the array of implementation actions, strategies and procedures that are in place to achieve the goals and policies that the General Plan sets forth. Inconsistency requires denial of the project OR adapting the General Plan to fit the Specific Plan – the tail wagging the dog. Changes of this magnitude (Land Use Policies, Mobility and Safety Elements) to the August 3, 2011 San Diego County General Plan would require revisiting the Environmental Impact of

the San Diego County General Plan and likely invalidates the San Diego County General Plan. Broad and fundamental amendments to adopted General and Community plans would require county-wide environmental review.

We all can understand why the applicants might want to avoid disclosing the array of GP and CP Goals and Policies that this project violates. But CEQA's purpose is not to gloss over or obscure inconsistencies in order to ease approval of this project. CEQA's purpose is disclosure.

Therefore, the DEIR for this SP/GPA must reckon specifically and individually with the General Plan Vision and Guiding Principles and the reflection of these in the Community Development Model, as well as with Goals and Policies across the GP's seven elements: Land Use, Mobility, Conservation and Open Space, Housing, Safety and Noise; as well as goals and policies of the Bonsall and Valley Center Community Plans.

Once inconsistencies are disclosed there are only three ways to resolve them: reject the project, re-design the project, or re-build the County General Plan to suit these applicants. **Inconsistencies with General and Community Plans, Design Guidelines and other ordinances and policies are NOT subordinate to this project's Specific Plan, as the Specific Plan asserts.**

I. The California Environmental Quality Act (CEQA) requires a General Plan consistency analysis and supportable conclusions. How can the DEIR conclude that planning impacts are 'insignificant' without these analyses?

The DEIR fails to disclose the extent to which this SP/GPA is inconsistent with the County's planning documents. Land use impacts, far from "insignificant" are broad and fundamental. Amendments necessary to accommodate this SP/GPA would require rejecting the GP's foundational vision of Smart Growth and eliminating the many GP Policies that support it.

It is not the intention of the San Diego General Plan to drop "new villages" into semi-rural and rural areas. To the contrary, the County General Plan is rooted in its "Smart Growth" intention. Smart Growth is a two-sided concept. On the one hand Smart Growth locates future development in areas where infrastructure is established; AND on the other hand, Smart Growth also retains or enhances the County's rural character, economy, environmental resources, and unique communities. These are integrated, co-dependent concepts. They work together.

The proposal to plop a dense from-scratch 608-acre Village of 5000 people into several thousand acres of infrastructure-lacking Semi-Rural and Rural land is inconsistent with the County's commitment to "sustainable development." This foundational concept is described at length in the introduction to the County General Plan; and it is expressed across the web of interdependent GP Guiding Principles,

Goals and Policies that have been put in place to bring about the County's Smart Growth Vision. To reject this Vision now will, in essence, require an entirely new County General Plan.

II. Paramount among the project's GP inconsistencies is its failure to comply with Land Use Goal 1 (LU-1) and Policy LU1-2

Consistency with Land Use Goal 1 (LU-1) and with Policy 1.2 (LU 1.2) is especially crucial for this project's approval. These speak directly to the requirements for establishing NEW villages in San Diego County. They emphasize the primacy of the Land Use Element and the Community Development Model, and the prohibition of Leapfrog Development.

Land Use Goal 1: Primacy of the Land Use Element. *A land use plan and development doctrine that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories.*

Land Use Policy 1.2: Leapfrog Development. *Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED Neighborhood Development Certification (LEED ND) or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established villages or outside established water and sewer service boundaries. (See applicable community plan for possible relevant policies.)*

The DEIR for this SP/GPA asserts that the project is consistent with GP Policy LU 1.2. But, this is not the case. The SP/GPA fails in the most fundamental ways to respect the County's commitment to sustainable development.

- A. The project is inconsistent with the GP Community Development Model,
- B. The project is inconsistent with LEED ND standards,
- C. The project is also inconsistent with the 3rd requirement for waiving the prohibition on leapfrog development which is to provide necessary services and facilities:
 - 1) Ten (10) modifications to the County road standards REDUCE capacities to sub-standard levels
 - 2) Traffic impacts are significant and deemed unmitigatable by the applicant.
 - 3) The project fails to meet 5 minute response time for Fire and Emergency Medical Services.

The project fails to present a legal and viable point design for sewage and waste water treatment. To elaborate:

A. The Accretive SP/GPA is Inconsistent with the GP Community Development Model

The proposal is by definition inconsistent with the Community Development Model because consistency can be achieved only by amending the General Plan to fit the project. 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 ...”*

First, as the above statement in the County General Plan makes clear, 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 whole system of the General Plan's Regional Categories. Amending a Regional Category, therefore, requires also amending the network of planning concepts that the category is expressing, for example:

1. The General Plan states (pp.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.”*
2. The proposed site is designated not for Village development but for large semi-rural parcels (SR 10 and SR-4). This SP/GPA proposes to plop a Village into the middle of an area that the Community Development Model designates for Semi-Rural and Rural development. This action requires AMENDING the Community Development Model. Instead, with no discussion or analysis, the SP/GPA and the DEIR all assert that consistency with the Community Development model is achieved with a simply change to the Land Use map.
3. Further, the site abuts SR-4, SR-10 and Rural-40 acreage. The Community Development Model **requires** a “feathering” of residential densities from intense Village development to SR-0.5, SR-1, SR-2, SR-4, and so forth. The Accretive SP/GPA is inconsistent with the concept of feathering which is reflected properly in the pattern of land use designations in Valley Center's central valley.
4. 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.

5. As for infrastructure, there are few existing roads in the area. They are built and planned to service Semi-Rural and Rural development, as in the current General and Community Plans. Despite proposing intense Village development, the proponents also propose to retain or reduce capacities of these roads. Water infrastructure serves 50 homes and agricultural irrigation. There is no wastewater service.
6. The intent of the Community Development Model 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. Twenty-five percent (25%) of the community's future development is now planned for the "Village" area 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.
7. A key component of including a Community Development Model in the General Plan with "integrity" was to create a framework for future growth. The DEIR completely ignores this concept by concluding that the project would not be growth inducing. This conclusion is in complete contradiction to the General Plan which identifies existing villages as the hubs for growth. Additionally, the County has a long track record of approving General Plan Amendments that increase density using the adjacent properties as justification. The DEIR claims that this would not occur, but history has proven otherwise.
8. The DEIR refers to the Property Specific Request (PSR) General Plan Amendment process that was directed by the Board and claims that the project is not growth inducing. Presumably the PSR/GPA is inducing the growth? This suggestion is misleading. The outcome of the PSR/GPA remains to be seen. Approval is not a foregone conclusion and processing will be lengthy. More likely is that approval of the Accretive project would usher approval of the PSR/GPA in Valley Center, thus inducing unplanned growth of this area.
9. However, growth inducement wouldn't stop there. Even IF the PSRs in Valley Center, are approved the lands surrounding the proposed project (and some lands which the proposed project surrounds) would still be designated at lower semi-rural densities than the village densities proposed for the Accretive SP/GPA. Into the future, these land owners will continue to seek similar treatment to that of their neighbor and based on the County's track record, they will receive it.

Second, the project design itself also defies the GP principles, goals and policies for Village development, and for Village expansion, which the Community Development Model reflects.

1. The 608-acre project site, only a portion of which is actually owned by the applicant, sprawls 2 miles N-S, and 2 miles E-W across several thousand acres, largely in active agriculture. These surrounding acres are owned by people

whose dreams and ambitions for their rural properties are in accord with the Community Development Model's Regional Category assignment: Semi-Rural and Rural.

2. The sprawling site creates some 8 miles of edge effects that will threaten surrounding agriculture, horticulture and animal husbandry that the GP Community Development Model protects by designating this area for Semi-Rural and Rural development. This sprawling shape also increases the likelihood that the proposed project will be growth inducing as previously mentioned.
3. With 1746 units and 90,000 SF of commercial on 608-acres, there is insufficient land available for "feathering" residential densities as the Community Development Model intends and describes.
4. The site requires 3 separate commercial nodes to support the "walk-able" claim. It is more than a stretch to characterize the project as a "walk-able Village" when it is, in fact three circles of dense housing. Two of them are at least a mile from what the Community Development Model would characterize as Village amenities. The LEED ND standard for "walking distance" is ½ mile, the GP also cites ½ mile (GP, p.3-8).
5. This is not the "walk-able" compact Village it pretends to be. The fake Town Center is more than one and a half miles from the ½ mile standard required by LEED ND and cited in the General Plan.
6. The proximity of Rural Lands to the project presents wildfire threats which the applicant's Fire Protection and Evacuation Plans recognize but fail to adequately mitigate. In addition to wildfire the Accretive project adds the additional hazards of Urban Multi Story Structure Fires and nearly two orders of magnitudes increased volume and complexity of Emergency Medical Services (EMS). The Accretive Fire Protection Plan barely mentions the Structures and EMS hazard potential, let alone any mitigation plans. The Deer Springs Fire Protection District (DSFPD) has gone on the record three times (6/12/2012, 3/5/2013 and August 7, 2013 stating that DSFPD has major issues with the Project as proposed. Accretive has glossed over these issues raised by a Public Safety agency and the County has allowed the Project to proceed in the General Plan Amendment process.

B. The Accretive SP/GPA is Inconsistent with LEED Neighborhood Development Certification standards

Compliance with LEED Neighborhood Development Certification standards is a second critical requirement for this project. Without analyses required by CEQA, the DEIR ASSERTS compliance with LEED-Neighborhood Development requirements, perhaps because analysis reveals that the Accretive SP/GPA so woefully fails to meet them.

But , unsubstantiated assertion fails to satisfy CEQA. The County must comprehensively address the numerous and exacting requirements of LEED Neighborhood Development Certification. If the County is applying not LEED ND but an

“equivalent standard” as policy LU1-2 allows, the analysis should name the standard and show how it is equivalent.

To date we believe there is no recognized equivalent to LEED ND; and if there were a recognized equivalent it would be, well, equivalent. Despite the insistence of a few PDS staffers who will remain nameless that “there might be an equivalent standard that does NOT require a “Smart” location, in the English language the word “equivalent” does mean “equal.”

At the end of this document we have included key excerpts from the booklet, ***LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT***. However, we encourage thoughtful readers to review the entire 70-page booklet where these exacting standards are discussed and illustrated in intricate detail. The booklet is published by the U.S. Green Building Council and is available on their website.

As the booklet makes clear: For LEED ND Certification a few location, conservation and design criteria are mandatory. This means that, regardless of how many “points” are accumulated for “green” amenities, LEED ND Certification cannot be achieved without meeting a few essential standards in particular categories.

We await the County’s analysis of the full complement of standards for LEED ND Certification. GP LU1-2 is clear in its intention that the Accretive SP/GPA must comply with all standards that are required for LEED-Neighborhood Development Certification. However, in order to provide the reader with a sense of how comprehensive and detailed the LEED ND standards are, we have included below a list of the mandatory requirements for the two areas where our comments are focused this time -- Smart Location and Neighborhood Pattern and Design. We will address some of these in our comments below.

(More detail is available below in the attachment, *SELECTED BRIEF EXCERPTS FROM LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT* or from the original 70-page document on the U.S. Green Building Council website.)

SMART LOCATION and LINKAGE

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Smart Location

Prerequisite 2 Imperiled Species and Ecological Communities

Prerequisite 3 Wetland and Water Body Conservation

Prerequisite 4 Agricultural Land Conservation

Prerequisite 5 Floodplain Avoidance

NEIGHBORHOOD PATTERN AND DESIGN

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Walkable Streets

From our review of the LEED ND requirements, we conclude that Accretive's SP/GPA fails to meet fundamental requirements for LEED ND Certification for the following reasons:

- 1) **The site is not a "Smart Location."** The EIR concludes that the project is consistent with LEED-ND but completely overlooks its mandatory site selection requirements. However, the EIR does not address how this aspect of LEED-ND can simply be overlooked when the program was specifically designed to "place emphasis" on site selection. A fundamental premise of Smart Growth is to lower automobile dependency as compared to average Development. The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip. The SANDAG average miles/trip for the unincorporated San Diego County is about 13 miles/trip which is why the region is directing growth to the incorporated cities and existing villages. Accretive is proposing an automobile based urban sprawl community that even with exceedingly high and unsubstantiated internal trip rates is 47% higher than the San Diego County average (8.52/5.8) trip distance.
- 2) **The site is too large (exceeds the 320-acre maximum size).** This maximum area is based on critical factors such as providing the appropriate density of services and neighborhoods within a compact community and achieving walkability. The EIR fails to address how the project is still in compliance with the LEED-ND program when it exceeds a standard that was determined by the "core committee's research."
- 3) **The proposed SP/GPA fails to meet LEED ND standards for a "walkable" neighborhood:** This issue brings to light another more fundamental one with much of the EIR's documentation. Throughout the document there is the assertion or suggestion that the proposed project will be "walkable". However, the only evidence that is provided are three circles on a map to suggest that someone could walk to someplace within that circle if they wanted to. This is not the definition of a walkable community. The LEED-ND standards were developed through the research of a core committee which suggests that a walkable neighborhood is no more than 320 acres and all services, civic uses, employment, and high density housing are contained within that 320 acres. Describing the proposed project as walkable is unsubstantiated and misleading. Further it has likely undermined technical analyses that rely on the premise that the project is walkable and take credit for that. These include the traffic, air quality, and greenhouse gas emissions analyses.
- 4) **It is neither an infill site nor a new development proximate to diverse uses or adjacent to connected and previously developed land. It is sprawl plopped into a functioning agricultural area, with no existing infrastructure.** The objectives of the LEED-ND program are clearly compatible and in alignment with the guiding principles of the County of San Diego's General Plan and with the siting of "new green neighborhoods." As a result, it was integrated into the

Leapfrog policy of the General Plan. Any proposed deviation from LEED-ND, such as ignoring siting criteria, size restrictions, and density guidelines, should be evaluated in this context.

- 5) **The plan does not locate all its residential uses within ½ mile of its “CENTER.”** It adds suburban sprawl up to one and a half-miles beyond the one commercial area that is large enough to qualify as a LEED-ND compliant Town Center.
- 6) **Because a site design is not available for the Town Center area we have no way of knowing whether this area itself complies with LEED-ND standards.** The Specific Plan claims compliance, but this claim is not substantiated or shown.
- 7) **The site is not served by existing water infrastructure that is adequate to serve urban density.** Water infrastructure is designed for agricultural users and needs significant revision for high density Urban uses. There is no wastewater infrastructure.
- 8) **No water or wastewater service is planned to serve urban development of this area.** Arguably the site is within a legally adopted, publicly owned water and wastewater service area. However, if “planned service” means that the current General Plan and the VCMWD’s own plans currently call for expansion of the infrastructure required for a project such as this (which they do not[]), it does not meet this alternative, either. If it means only that a district with those powers exists and encompasses the Project site, then the Project must provide new water and wastewater infrastructure for the project. But it cannot do so because there are no easements the Project controls to establish such service.
- 9) **The Project description itself demonstrates that the SP/GPA cannot satisfy ANY of the 3 OPTIONS for fulfilling the Smart Location REQUIREMENT:**
 - a. It is not an Infill Project
 - b. It is not an Adjacent Site with Connectivity (does NOT have is at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project) boundary, that is adjacent to previous development
 - c. The site is not designed as a Transit Corridor or Route with Adequate Transit Service. The only mass transit is two bus routes located 4 miles north of the Project which run the circuit of the 4 Indian Casinos on SR-76.
 - d. None of the LEED ND significant public transit service requirements are met by the proposed circulation system. (e.g. at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1).
 - e. The only transit mentioned by Specific Plan and/or DEIR is that NCTD might consider a bus stop serving part of the project. This is inadequate.

C. The Accretive SP/GPA fails to provide necessary services and facilities for the intense urbanization being proposed.

1.) **ROADS.** Traffic impacts are significant and the applicant has proposed no acceptable mitigation measures. The applicant's request for ten (10) modifications to the County road standards will actually **REDUCE** road capacities to sub-standard levels. Accretive Investment Group proposes Village development of a rural area. But the applicant **does not propose Village capacity roads that are necessary to accommodate the traffic that will be generated by their Village project.** Incongruently, and not disclosed openly in the SP or the DEIR, the applicant proposes ten (10) modifications to the County Road Standards that will *reduce capacities* of roads that were planned, in the first place, to accommodate Rural and Semi-Rural residential development that GP Principles and the land use designation that reflects them have intended for this area.

One purpose of the General Plan Mobility Element and the County Road Standards is to specify road standards and automobile capacities that are necessary to serve surrounding land uses throughout the County. Land Use and Mobility Elements are tightly coordinated. Village-capacity roads are specified as necessary to serve Village land uses. Presumably decision makers will agree that road capacity standards set by the County GP Element and the County Road Standards are "necessary" standards).

However, Accretive Investment Group proposes to compromise standards that are employed uniformly across the County in order to win for themselves entitlements to urbanize land uses -- without responsibility for urbanizing road capacities. Specifically, they propose to add 20,000 Average Daily Trips to Mobility Element roads, and to pass the real costs of improving these roads on to the taxpayers. Further, they are finagling "consistency" with County planning standards pretty much across the board not by complying with them, but by relaxing them.

For example, their proposal is to **DOWNGRADE** West Lilac Road from its current Class 2.2C to a reduced-capacity Class 2.2F. And then, they further propose that two segments of West Lilac Road and one segment of Old Highway 395, which will operate at unacceptable Levels of Service E and F as a result of their new "Village" be sanctioned as official "exceptions" to the County standard for minimum Level of Service. TIF fees of approximately \$5 Million are utterly inadequate to afford the road reconstruction necessary to service this development's traffic. The Valley Center Road widening five years ago cost in excess of \$50 Million. Road improvements in already-urban places are expensive.

In remote places road improvement costs are enough to kill projects. No doubt recognizing this problem, the proponents themselves argue *against* improving roads to capacities that are necessary. They say to do so:

- is too difficult and costly
- will require rights-of-way that may be unobtainable

- will be time consuming to construct
- will be disruptive to off-site property owners
- will face opposition from existing neighbors
- will require condemnation of right-of-way
- will impact biological open space.

These are, of course, the exact reasons why the San Diego General Plan and LEED Neighborhood Development both direct urban development away from undeveloped sites like this one into areas where necessities and amenities required for urban dwellers are already met. You'll recognize these points in the review of General Plan and Community Plan policies that follows.

Once again we must acknowledge that these applicants are not envisioning or proposing an SP/GPA to implement the County's widely- recognized and well-admired 30-year plans for genuinely-sustainable growth. This would be the right approach. To engender this sort of cooperation is also the intended outcome of the County's substantial and ongoing investment of public funds in planning efforts and planning activities.

To the contrary, this project hijacks the language of sustainability to push through a proposal which, if approved, will disintegrate San Diego's effort to lead the nation in this area. This project is NOT "sustainable" development. This SP/GPA requires an array of *exemptions* from the interdependent planning principles, goals, policies and standards that the County has put in place in order to achieve its Vision for sustainable development. (Why invest public funds in planning, we ask, if the next step is to invest more public funds in a "review" that ignores the plan?)

This SP/GPA will add 5000 urban residents to country roads while *reducing* road widths, *reducing* road design speeds and *ignoring other standards* established for safe, efficient transportation. The proposal:

- Fails to provide necessary services and facilities
- Is inconsistent with GP premises that development will pay for itself;
- Is inconsistent with the GP minimum standard for LOS D on County roads;
- Compromises the safety, comfort and quality of life of prospective residents as well as all the other residents of Valley Center who depend on these Mobility Element roads.

For the Accretive project proponents to be angling for approval to shirk necessary County road standards while at the same time claiming to provide necessary services for this intensely urbanized Village project is a disingenuous contradiction. Sanctioning these exemptions would create significant long term SAFETY and liability issues for the County of San Diego.

3.) **ROADS.** Accretive does not have legal right of way to build most of the indicated off-site road improvements.

4.) **ROADS.** Additionally, in order to meet the County Road Standards, two out of four secondary access intersections (Covey Lane and Mountain Ridge) with public roads will require the use of County prescriptive rights (for continual brush clearance) and eminent domain (to secure land from unwilling property owners). Accretive Investments has filed Sight Distance Analyses on these two intersections that confirm the above assertion.

5.) **RESPONSE TIME.** The SP/GPA fails to meet 5 minute response time for Fire and Emergency Medical Services The Deer Springs Fire Protection District has commented in writing that none of the proposed options listed in the Specific Plan and Fire Protection Plan are feasible solutions for the District to meet the 5 minute emergency response requirement for Lilac Hills Ranch.

6.) **WASTEWATER TREATMENT.** The project fails to present a legal and viable point (site location and sewage and waste water treatment functional description) design for sewage and waste water treatment. The preferred option listed by the applicant lacks legal right of way for offsite sewer and recycled water pipelines.

How can the DEIR for this project claim otherwise?

III. The Accretive S/GPA is inconsistent with the Purpose, Intent and Guiding Principles of the County General Plan.

Above we have highlighted the most fundamental and egregious flaws in both the GPA/SP and the DEIR. This should have been the role of the county staff in shepherding this Project. The community and general public should not be required to perform analyses necessary to identify this project's inconsistencies with CEQA and with County General and Community Plans, and CEQA. Citing these oversights should be sufficient. However, we are faced with a dilemma: to be as complete as possible or let significant matters get away without analysis.

Chapter 3 of the DEIR purports to be analysis of issues which, it concludes, have No Significant Impact. Pages 3-56 through 3-65 set out a few GP Land Use provisions that are applicable to the Accretive Project. However, most relevant GP Goals and Policies are missing. After NOT analyzing any inconsistencies with the many omitted Goals and Policies, the DEIR does two clever things: It refers the reader back to the SP for more discussion of GP compliance (which is non-existent or equally skimpy); and it takes the giant illogical leap, with NO ANALYSIS whatsoever, to conclude that merely by adopting a different Land Use Map, all inconsistencies disappear.

Our comments below highlight a few (due to time and space constraints) of the MANY inconsistencies and issues with the County General Plan that this project has failed to remedy or resolve,

A. Purpose of the General Plan. Chapter 1 of the General Plan contains in its Introduction and Overview an array of directives that the applicant, the applicant's consultants and the DPS staff have all ignored.

The statements that follow, and many others that appear on several hundred pages of the County General Plan, reflect what many citizens believe is a social contract between San Diego County government and the people. To overlook these declarations in the review of this project would be a gross violation of the public trust. Here are a few ...

(p1-4.)

1. The General Plan must be referred to in its entirety, including separately bound portions (such as community plans). While the GP is internally consistent, some issues are addressed through multiple policies and some receive refined and more detailed direction in Community Plans (p. 1-4.)

(p1-5)

1.) Policies cannot be applied independently (p1-5).

2.) If you are a SD County resident or property owner, the GP indicates the general types of uses that are permitted around your home and changes that may affect your neighborhood, and the policies the County will use to evaluate development applications that might affect you or your neighbors. The Plan also informs you regarding how the County plans to improve mobility infrastructure, continue to provide adequate parks, schools, police, fire, and other public services, protect valued open spaces and environmental resources, and ...

3.) Future development decisions must be consistent with the Plan.

4.) The essence of the Plan lies in its goals, policies, and implementation programs.

5.) Policies provide guidance to assist the County as it makes decisions relating to each goal and indicates a commitment by the County to a particular course of action.

B. General Plan Guiding Principles. The General Plan's Guiding Principles also are more than empty words that are subject to manipulative and self-serving interpretation. These Guiding Principles – for the countywide consortium of stakeholders who nursed this language for many months before we endorsed it -- were intended to actually GUIDE development and conservation in San Diego County.

Advance Planning Staff worked with hundreds of citizens, property owners, real estate developers, environmentalists, agricultural organizations, building industry representatives, and professional planners, for years to create a General Plan that would build what we need, and conserve what we must. These Guiding Principles gave birth to the Community Development Model, and to the systematic method through which planning principle, and the County's commitment to authentic sustainable development, was transferred from human hearts and minds to the ground.

The DEIR should, but does not, thoroughly discuss and analyze the GP Guiding Principles (GP pp. 2-6 through 2-15), but merely cursorily sets them out and in some cases, gratuitously, without reference to factual aspects of the Accretive project, asserts compliance.

The following is a more serious and respectful review of the **San Diego County General Plan's Guiding Principles** and their application to this project:

GUIDING PRINCIPLE 1. Support a reasonable share of regional population growth. The DEIR fails to note that the GP establishes Valley Center's "reasonable share" at 36,000 at build-out, not the 41,000-plus that would result from this project's plopping of a new city in the middle of a well-functioning agricultural area. This discrepancy is not recognized nor analyzed.

a.) The General Plan already accommodates more growth than SANDAG projects for 2050. The DEIR fails to justify the need for 1746 additional homes, 90,000 additional SF of commercial.

b.) There are significant environmental and planning consequences from providing an excess of housing and employment in a rural area that are not addressed in the DEIR:

- i. As a region, with SANDAG providing coordination, we have been trying to steer growth to incorporated cities where transportation investments are occurring and goods, services, and employment are in abundance. The proposed project undermines this effort. It contradicts growth principles that all jurisdictions have developed through SANDAG, and conflicts with the Regional Transportation Plan and Sustainable Communities Strategy (SCS).
- ii. The SCS is the region's strategy for addressing GHG emissions targets for land use and transportation yet the DEIR fails to address the consequences of the proposed project conflicting with it.
- iii. By providing a glut of housing in a rural area, the proposed project throws a wrench in the region's growth strategy. The provision of more homes in Valley Center will reduce the demands for homes elsewhere. Generally, it has been the incorporated cities that have needed to plan for more homes to accommodate future regional growth. The proposed project will eliminate that need by 1746 homes. If built in the incorporated cities pursuant to regional plans, these homes would have shorter vehicle trip lengths, be closer to transit, jobs, and services, and use less water and electricity. The DEIR fails to address these consequences.

c.) There are also impacts of providing excessive commercial uses. The proposed project plans for commercial uses in excess of local and regional forecasted needs. There are two possible consequences of this situation:

- i. the commercial space in the proposed project will never be filled, the town center will never be a center, and there will be nothing to walk to if you wanted to walk 2 miles from one end of the development to the town center;

- ii. the proposed project will pull commercial uses from other existing commercial areas nearby such as the Valley Center and Bonsall town centers. This will result in vacancies and blight in these village centers and will undermine their growth strategy and vision.
- iii. The DEIR needs to include a comprehensive economic study of the proposed project and its economic viability within the context of community and regional plans. The results of such a study will be the grounds for the evaluation of additional environmental consequences of the project.

GUIDING PRINCIPLE 2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services and jobs in a compact pattern of development. The project and DEIR completely ignore this principle (and its implementing Goals and Policies) with the fiction that merely adopting a map with different land use designations for 608 acres they have owned or optioned will miraculously create compliance with the County General Plan. The GP and VC Community Plan -- without this project -- currently embodies this Principle, with the design for the central Villages and the feathered-out supporting semi-rural and rural designations. This project would destroy that design and compliance.

As previously discussed, the Accretive project site lacks both existing and planned infrastructure. Infrastructure proposed by the project cannot be provided at a level consistent with County standards. Further, as discussed, the proposed project is not a compact pattern of development. It sprawls over 2 miles and has to include 3 town centers rather than 1 to justify the claim that it is “walkable” and thus, presumably, compact.

GUIDING PRINCIPLE 3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities. This project recognizes this Principle only in its abuse. Nowhere does the DEIR recognize or analyze the impact of the Project on the existing and proposed central Village economy and character. Worse, in its insubstantial discussion of the key CEQA issue of “Divide an Established Community” the DEIR states that there is no established community! (DEIR 3.6.5, p. 3-120.) and thus there is no need to address this issue in the DEIR. The central valley villages DO exist, they are the heart of the existing community, and they are where the GP and CP plan Valley Center’s future growth is consistent with the General Plan. This issue must be fully analyzed in the DEIR. See above for more discussion on these concerns.

GUIDING PRINCIPLE 4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County’s character and ecological importance. Instead the Project proposes bulldozing 4 Million cubic yards of natural hills to make manufactured slopes, to accommodate an urban-styled city in an active agricultural area.

GUIDING PRINCIPLE 5. Ensure that development accounts for physical constraints and the natural hazards of the land. Instead the Project proposes bulldozing 4 Million cubic yards of natural hills to make manufactured slopes, to accommodate an urban-styled city in an active agricultural area.

GUIDING PRINCIPLE 6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation. The Project instead says perhaps NCTD might be interested in a bus stop. It is entirely car-dependent. If approved there are no commercial, no schools, no parks until phase 3, 6-8 years after plopping phase one houses in the middle of nowhere. The Project does not have legal rights for the required ingress and egress to be able to construct them. If they were constructed, they would undermine connectivity by blocking emergency egress, and detract from supporting community development patterns in the central Villages, where the GP and Community Plans call for potential construction of roads to enhance connectivity.

GUIDING PRINCIPLE 7. Maintain environmentally sustainable communities and reduce green house gas emissions that contribute to climate change. This Project waives the flag of environmental sustainability at every opportunity, but totally ignores fundamental requirements for building where substantial investments have already been made in urban infrastructure and amenities. Description in the DEIR of the state and county new requirements for “green buildings” and energy-saving construction and facilities are beside the point. This project destroys agriculture and functioning rural lands that genuine “sustainable development” would be retaining. Further, this “fluff” is purple prose, unsubstantiated and inadequate to determine if the suggestions or promises in the SP are minimum or substantive requirements that warrant the use of “sustainable.” LEED building standards, like LEED ND standards are specific, and they are expensive. Suffice to say that nothing about this applicant’s performance, so far, suggests exemplary performance. Many more facts are necessary to adequately analyze this issue yet based on the information available, any characterization of the project as “sustainable” is a complete farce and undermines the ability of the public and decisions makers to evaluate the project on its true impacts, characteristics, and merits.

GUIDING PRINCIPLE 8. Preserve agriculture as an integral component of the region’s economy, character, and open space network. Instead the Project would take 504 acres of productive agriculture out of use and replace it with an urban city. The DEIR relies on a model to devalue existing productive agriculture and ignores the reality that the project site and surrounding area contain some of the most unique and valuable agricultural operations in the region.

GUIDING PRINCIPLE 9. Minimize public costs of infrastructure and services and correlate their timing with new development. Instead the SP and implementation plan are geared to increase public infrastructure costs while minimizing the Applicant’s infrastructure costs, in an area devoid of infrastructure. Plans for construction, instead of concurrent with need, are designed to be significantly after need.

GUIDING PRINCIPLE 10. Recognize community stakeholder interests while striving for consensus. This applicant has ignored the VC community and its Community Planning Group throughout the entire planning process. Applicant attendance at Planning Group meetings has been by a consultant/lobbyist who never has answers to the questions raised regarding either specifics of the proposal, or the process. Promises to “get back to you about that” never have been kept. Claims that the proponents were “working with the community” are incorrect. They mean that they held private meetings with pre-screened potential supporters, to which the public, and certainly Planning Group Members, were in many cases dis-invited. On the very few occasions the general public was invited, food and story boards were presented, but no detailed oral presentations of the project’s contents, nor public questions were allowed. Approval of the PAA was opposed by staff and the Planning Group and a large percentage of the community; it was obtained from the Planning Commission by a procedural trick on the eve of a major holiday, so no one could know it was being acted on, and could effectively object. At the Board of Supervisor’s hearings on the removal of the improperly-placed Road 3A for the Project, the Applicant denied needing or requesting the road, and pointed to “community support” from the “Valley Center Town Council”, a non-existent organization consisting of 3 Accretive supporters, purporting to represent the “real” Valley Center community, instead of the Planning Group. Numerous Planning Group reviews were required by staff and totally ignored by the Applicant, no changes were ever made in response to any of the community’s comments.

In short, the applicant has never recognized community interests and has never (unlike all the other developers the community has worked with) sought consensus.

IV. Staff identified 121 GP Policy conflicts in the Scoping Letter. These are not analyzed in the DEIR, or in the Specific Plan, or anywhere else. Why not?

Earlier in the review of this project a *“Project Issue Checklist”* listed (on 350-plus pages) more than 1000 project “issues” with various planning documents. The list included Major Project Issues (with GP Policies) as well as GP and CP Policies that posed potential conflicts. Analyses of these “issues” are essential to a General Plan Amendment. How else can anyone understand what the GPA proposes to amend?

The staff directive to the applicant at that time was, *“Please immediately review the policies and indicate to staff how you would propose to revise these policies or if you disagree with staff’s analysis. If policy revisions are required to the County’s General Plan, then the project’s EIR must also analyze the impacts to the County’s General Plan.”* In subsequent editions, the “Checklist” refers the reader to other documents – in some instances to a GPAR (General Plan Amendment Report), in others to the Land Use Section of the EIR. However, looking at these resources there is no policy by policy discussion of consistency. This level of analysis must be provided.

The June 13, 2012 version of the Project Checklist is attached. We request County response and analysis of each item listed.

A. CEQA requires these analyses, and the DEIR omits them. The DEIR (in Section 3.1.4.1, pp 3-56 – 3-64) lists what it calls the “relevant policy and regulatory framework” for the project. But this list is not the detailed analyses that CEQA requires; instead, under the rubric of “Existing Conditions” this section is mainly a summary of applicable planning documents.

Section 3.1.4.2 (p 3-64) is titled “Analysis of Project Impacts and Determination of Significance.” Here in the subsection *“Impact Analysis”* analyses of specifics are either missing or inadequate, and replaced with brief descriptions of the project followed by assertions. Examples are rife, here are a few:

- 1.) Without bothering even to acknowledge the array of GP policies that would have to change in order to approve this SP/GPA, the DEIR merely asserts the conclusion: *“The proposed project includes a General Plan Amendment which, if approved, would result in the project being consistent with the General Plan.”*
- 2.) There is no discussion of LEED ND criteria, and the GP Community Development Model is presented as if it is no more than an arrangement of densities rather than a reflection of a whole complex of interdependent ideas about sustainable development. Nevertheless, the DEIR asserts that *“the proposed project would be consistent with the Community*

Development Model of the County General Plan and designed to meet the LEED Neighborhood Development Certification or an equivalent.”

3.) In the few cases where specific GP policies are cited, the evidence for consistency with the policy is in some cases asserted by merely repeating the language of the policy itself. For LU1.2: *“the project is not “leap frog development” because it is designed to conform to the Community Development Model, provides necessary services and facilities, and would be designed to meet the LEED Neighborhood Develop Certification or an equivalent.* For LU3-1, LU3-2 and LU3-3: *“The project likewise provides “a complete neighborhood” to include a neighborhood center within easy walking distance of surrounding residences while providing a mixture of residential land use designations and development regulations that accommodate various building types and styles.”*

4.) In a few cases where the SP/GPA proposes amendments to Mobility Element road classifications or acceptable LOS levels, the DEIR argues that the SP/GPA is not inconsistent with the GP because relaxing the standards makes it consistent. Again, the point here is that consistency is achieved only by amending the General Plan to fit the project.

5.) The DEIR (Section 3.1.4, p 3-56, Land Use Planning, line 4) refers the reader to the Specific Plan, and asserts falsely (p. 3-65) that *“the project’s conformance with other General Plan policies is detailed in the Specific Plan. Overall the project would be consistent with the General Plan; therefore land use impacts associated with policy inconsistencies would be **less than significant.**”*

6.) In its cursory dismissal of Growth Inducement (DEIR 1.8.1 p1-37) the DEIR states: *“...While the project site and surrounding areas are not identified in the General Plan for growth, it is a location where such growth is likely to occur because the project area can accommodate the growth. Typical obstacles to growth include a lack of services and infrastructure which are not present in this area. The project area is positioned in proximity to the I-15 and within existing districts for sewer water and fire service. There is an adequate road network offering multiple routes throughout the project and would ultimately connect with freeway ramps. By itself, the proposed project takes advantage of the location of the project site, but would not result in any change in density for surrounding areas....”* There is a brief reference to potential increased density from Property Specific Requests near the Project, **but there is NO discussion or analysis of the growth inducing impacts of new road, water and sewer infrastructure that properties west, east and south of the project would tout as reasons why they should also be developed at urban densities.**

7.) There should also be discussion and analysis of the impact of the precedent that would be set by encouraging this project’s General Plan busting notion that the Community Development Model is a “Village” puzzle piece that any developer’s ambition can drop anywhere in the San Diego County countryside.

B. It is important to note here that these analyses do not appear in the Specific Plan; nor does the GPAR that the staff referred to a few months ago ever materialize (even though this would be no substitute for the CEQA requirement.) It is odd that the DEIR and other project documents all refer the reader to this dry hole. Is this an error? Historically, a GPAR presents the details of a GPA and discusses its consistency, or lack of consistency, with all GP elements, but this *Specific Plan* text does NOT include a *General Plan Amendment Report* (GPAR) even though the SP at page 1-12 states that “... *Chapter V of the General Plan Amendment Report and Appendix A provides detailed analysis regarding how and why this Specific Plan is consistent with the goals and policies of the County General Plan...*” There is neither the GPAR nor an Appendix A! This application omits this crucial report. Why?

C. General Plan Goals and Policies NOT discussed or analyzed in the DEIR include:

LAND USE ELEMENT

LU-1.4 Village Expansion: *“Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all the following criteria are met: Public facilities and services can support the expansion without a reduction of services to other County residents, and the expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area”*

Comment-INCONSISTENT: If there was an existing or planned Village in western valley Center, Accretive could try to use this provision, instead of being prohibited by the Leapfrog Development provisions of LU-1.2. However, the only “existing or planned Village” in Valley Center is the Village in the central valley where north and south nodes are separated by a dramatic escarpment and Moosa and Keyes Creeks. This area has existed as a “Village”, has been planned for expansion for more than 50 years and was designated a SANDAG Smart Growth Opportunity area with the recent update of the County General Plan. The area is sewered and has received a large grant from the state of California to expand wastewater facilities. Valley Center Road which traverses this area and connects to Escondido and Pauma Valley was improved to Major Road standards only a few years ago in anticipation of expanded development here. The Valley Center Community Planning Group has increased residential densities in this area so that about 25% of the community’s growth can be accommodated in the “vibrant, compact Villages” the community has envisioned.

This provision is a clear companion to and exemplifies the GP support for intensifying development in existing Village areas and its thrust against leapfrog development -- by emphasizing only expansion of an existing Village. The Project also fails to meet the criteria: Its construction would clearly reduce services to all Valley Center residents outside the development by taking away from the economic viability of the existing two

Villages, as well as blocking emergency evacuation ability for current residents. As previously pointed out, its urban pattern is totally out of “character and scale” with Valley Center’s vision. Nor does a third Village provide “contiguous growth of a Village area.” A new Regional Category Village is prohibited in the area of the Proposed Project. This provision would have to be amended to allow this Project, and the DEIR would have to analyze the environmental effects countywide of such an amendment.

LU-2.3 Development Densities and Lot Sizes: *“Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.”*

Comment-INCONSISTENT: This is another demonstration of the interwoven fabric of the GP. Densities and lot sizes reflect community character. Valley Center’s community character (once you drop Accretive’s fiction that there is no existing community) is primarily rural, exemplifying the Community Development Model at the heart of the GP. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.

LU-2.4 Relationship of Land Uses to Community Character: *“Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.”*

Comment-INCONSISTENT: This is yet another demonstration of the interwoven fabric of the GP. Requiring projects to comply with the applicable Community Plan is the most effective way to meet the GP Goal LU-2, to maintain the county’s rural character. Valley Center’s community character (once you drop Accretive’s fiction that there is no existing community) is primarily rural, exemplifying the Community Development Model at the heart of the GP. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as previously pointed out.

LU-5.3 Rural Land Preservation: *“Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi-Rural Land Use Designations.”*

Comment-INCONSISTENT: If this Project proposed development consistent with its existing Land Use Designations, it would still be required by this provision to “preserve,” not destroy. The proposed project destroys even more open space, agricultural lands, wildlife habitat and corridors, and watersheds than it would be allowed with consistent development, by its urbanized design, density, and size, as previously pointed out. Urban densities and lot sizes proposed by this Project are inconsistent with the Semi-Rural land use designations established by the GP and CP for this area.

LU-6.1 - Environmental Sustainability: *“Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.”*

Comment- INCONSISTENT

There have been thirteen (13) Group 1 animal ‘species of concern’ observed on the Accretive project site. They include lizards, snakes, raptors, small mammals, large mammals and passerine birds. Most of the wildlife surveys conducted focused on the proposed open space areas, brushing over the considerable land area devoted to agriculture as being disturbed. Of the 608-acres on the Project site, 504-acres will be graded, cut and filled, for the construction of the Project.

The DEIR acknowledges the significant impact to these 13 species [and presumably to other species numerous enough not to be of concern], and particularly the raptors [white-tailed kite, Cooper’s hawk, turkey vulture] and the loss of 504-acres of foraging area [including agricultural areas]. The DEIR dismisses this loss with 81.7-acres of on- and off-site mitigation area [presumably already populated by members of these species with whom the Project’s individuals will compete], a substantial differential from the complete 608-acres. Many of the individuals of the 13 species will be killed during construction operations, particularly the smaller, less mobile animals. Others will be forced into new territory. Of the larger animals, they will be forced to compete with others of their species in substantially less area.

So, the Project is not protecting sensitive natural resources except those that it is prohibited from completely destroying [largely, riparian wetlands]. Such practices of building urban density projects in rural and even agricultural areas will ultimately decimate the natural environment.

LU-6.4 Sustainable Subdivision Design: *“Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and when appropriate, provide public amenities. [See applicable community plan for possible relevant policies.]”*

Comment-INCONSISTENT: The Accretive Project instead proposes the minimum required open space, eliminates existing and imperils adjacent agricultural operations, and substantially worsens fire safety and defensibility, as shown by the Deer Springs Fire District comments. Instead of reducing impervious footprints, it proposes 1746 residential units etc., covering 504 of its 608 acres. Trumpeting “sustainable” development practices, it completely ignores the fundamental requirements of LEED ND to have a Smart Location and preserve Agriculture. The public amenities necessary to support their proposed city in the county, parks, schools, sewers, are all couched in “conceptual” terms, with built-in defaults to convert acres to still more additional residences. If, for example, the school or park sites (proposed without school and park amenities) are not accepted, the SP provides for their easy conversion to residential uses. This provision would have to be amended to allow this Project, and the DEIR would have to analyze the environmental effects countywide of such an amendment.

LU-6.6 Integration of Natural Features Into Project Design: *“Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.”*

Comment: This requirement is again honored only in its violation by this Project. Over four million cubic yards of grading to destroy natural features and create “manufactured” hills suitable only for urbanized residential construction. This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

LU-6.6 Integration of Natural Features into Project Design: *“Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.”*

Comment-INCONSISTENT

With the exception of the riparian woodlands/wetlands that must be set aside, the 4 million cubic yards of blasting and grading will obliterate any other natural features of the Project site. Once completed, the Project will resemble any urban center in the county, with little of the natural landscape remaining. Native vegetation habitats will be destroyed and mitigated off-site. Animal populations will be destroyed or shoved to the remaining riparian set-asides or off-site. Avoidance of sensitive environmental resources is minimal; destruction of this area’s natural features and mitigation elsewhere are the preferred approaches for this project, obviously inconsistent with Valley Center’s objectives.

LU-6.7 Open Space Network: *“Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.”*

Comment-INCONSISTENT

This Project has reserved minimal open space along wetlands and riparian areas that are particularly protected by federal, state, and county laws. The continuity of the open space will be broken by multiple road crossings with culverts mostly inadequately sized for safe wildlife passage. Intensity urban development will dominate the presently rural agricultural and natural vistas with rows of dense urban rooftops. The open spaces being set aside are not coordinated with the draft MSCP/PAMA and will not connect with any similar open space uses off-site. While the Project is within the draft MSCP boundary, it is not part of a PAMA.

LU-6.9 Development of Conformance with Topography: *“Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent possible.”*

Comment-INCONSISTENT: Could the writers of the GP and the Board of Supervisors with their approval not make more clear that the destruction of the land proposed by this Project’s over four million cubic yards of grading to destroy natural features is prohibited? The Project glorifies, not limits grading. The Project proposes to obliterate, not “not significantly alter,” the dominant physical characteristics of the site. This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

LU-9.6 Town Center Uses: *“Locate commercial, office, civic, and higher-density*

residential land uses in the Town Centers of Village or Rural Villages at transportation nodes....”

Comment-INCONSISTENT: As previously pointed out in the comments on the Project’s total failure to meet the LEED ND Smart Location Requirement, it is not designed as a Transit Corridor or Route with Adequate Transit Service. It is not a “transportation node.” This provision would require amendment to approve this project. The DEIR would have to analyze the environmental effects countywide of such an amendment.

LU-09.11 Integration of Natural Features into Villages:*“Require the protection and integration of natural features, such as unique topography or streambeds, into Village projects.”*

Comment-INCONSISTENT: This provision was included in the GP because Valley Center required the developers of the north Village to do exactly that, making the streambed there an open space centerpiece of their design in their cooperative plans for their adjacent projects. Accretive instead proposes to obliterate the natural topography for their entire site, grading over four million cubic yards of genuinely natural features into manufactured hills. This policy would require amendment to approve this project. The DEIR would have to analyze the environmental countywide effects of such an amendment.

LU-10.2 Development- Environmental Resource Relationship: *“Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.”*

Comment- INCONSISTENT: This Project does not respect nor significantly conserve the unique natural flora and fauna of the site, nor does it conserve the rural character of the site. This Project will destroy a mosaic of natural vegetation habitats that are interspersed among agricultural uses. The current mix of natural habitats, orchards and row crops provides distinctive opportunities for a variety of faunal species [several of them sensitive], benefits the local hydrology by restraining and filtering run-off, and presents a pastoral view-shed that is historically characteristic of north San Diego County. The Project will create severe hydrology issues with the addition of hundreds of acres of impermeable road and rooftop surfaces that will cause excessive run-off. Run-off that would otherwise enter the water table and help to stabilize levels vital to the riparian habitats down-slope, will be impounded and/or dispersed on the surface. The Project will be composed of dense urban village configurations that are completely at odds with rural and semi-rural areas and the natural habitats and populations they support.

MOBILITY ELEMENT

M-12.9 Environmental and Agricultural Resources: *“Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors and agricultural lands. Within the MSCP preserves,*

conform siting and use of trails to County MSCP Plans and MSCP resource management plans.”

COMMENT-INCONSISTENT

Presently, the trails proposed for the Project will intrude into the buffer and LBZ areas along side the designated biological open spaces as well as the open spaces themselves. The fences proposed to separate and protect segments of the open spaces from the edge effects created by the Project [human intrusions, domesticated cats and dogs, invasive plant species, etc.] will also create barriers to the movement of wildlife. Instead of treating these biological open spaces as retreats and corridors for the movement of wildlife, the trails proposed would turn them into parks for humans and their pets. This will have an adverse effect on the value of these open spaces for wildlife.

CONSERVATION AND OPEN SPACE ELEMENT

GOAL COS-2 Sustainability of the Natural Environment: *“Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.”*

COMMENT-INCONSISTENT:

The Project will eliminate 504-acres of mixed native and agricultural lands that provide foraging area for numerous animal species identified in the biological resources report. This represents an incremental loss of habitat and ultimately a loss of local wildlife populations within the county and the Project site. The removal of the project site from the inventory of rural lands to create an urban village will constitute an irreversible loss and opposes the intent of sustainable development. It will likely result in growth inducing pressure on surrounding properties as the rural and natural characteristics of the land disappear.

COS-2.1 Protection, Restoration and Enhancement: *“Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important Natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.”*

COMMENT-INCONSISTENT:

This Project proposes to set a devastating precedent for the intrusion of urban development into rural lands. While the Project site is within the MSCP boundary, it is not a part of a PAMA. The site is presently designated for estate housing and agricultural uses but would be modified to allow urban village densities, which would diminish rural and natural lands within the MSCP area and likely induce similar densities on surrounding properties. Such creeping higher densities within the MSCP would ultimately impact the neighboring PAMA areas through edge effects and compromise value of those native habitats and the intent of the MSCP/PAMA program.

COS- 2.2 Habitat Protection Through Site Design: *“Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.”*

COMMENT- INCONSISTENT

Like GP Goal COS 2.2, the prerequisite of the LEED ND standard also is to place development in smart growth locations, such as urban infill and brown fields or adjacent to urban areas where there is easy access to infrastructure and job centers. This Project fails to meet those goals and, consequently, it will cause significant destruction of biological assets in an area that should be spared under the criteria for a smart growth location.

COS- 3.1 Wetland Protection: *“Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.”*

COMMENT-INCONSISTENT

The project is preserving and restoring the on-site wetlands, habitats that are in shortest supply regionally, but the upland vegetation components will be subjected to severe grading, and fuel modification to accommodate the development. Rather than being enhanced, the upland areas will be shaved of value for both flora and fauna.

COS- 3.2 Minimize Impacts of Development: *“Require development projects to: Mitigate any unavoidable losses of wetlands, including its habitat functions and values; Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydro modification, land and vegetation clearing, and the introduction of invasive species.”*

Comment -INCONSISTENT

The Project proposes to mitigate the loss of wetlands caused by new road crossings by restoring or creating wetland on-site adjacent to existing wetlands. The value of mitigating wetland losses on-site is questionable given the edge effects caused by human intrusion, domestic cats and dogs, invasive plant species, trash, etc. that cause mitigation efforts to be diminished. Exacerbating the edge effects is the plan to establish trails within and adjacent to the biological open spaces.

Further, the Project’s storm water run-off from the massive acreage of impermeable surfaces to be built is likely to impact the water regime within the biological open spaces. Adding too much or, conversely, removing too much water from the water table can have adverse effects on the survivability of the riparian habitat.

HOUSING ELEMENT

H-1.9 Affordable Housing Through General Plan Amendments: *“Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project when this is legally permissible.”*

Comment-INCONSISTENT: There appears to be NO discussion anywhere in the SP or DEIR regarding Affordable Housing or Goal H-1 and Policy H-1.9. Perhaps, since there are no firm plans for anything beyond the Phase I 354 homes, the County considers this not to be a “large-scale residential project?” Since the overall Project proposes more than 1746 homes and over 5000 new residents, it appears to be a “large-scale residential project.” This provision would require amendment to approve this project.

The DEIR would have to analyze the environmental effects countywide of such an amendment. Alternatively, the DEIR should contain some discussion and analysis of why this provision is not applicable or is otherwise satisfied.

H-2.1 Development That Respects Community Character: *“Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]”*

Comment: This is yet another demonstration of the interwoven fabric of the GP. Requiring projects “not to degrade or detract from the character of surrounding development consistent with the Land Use Element” explicitly ties housing back to the bedrock Land Use Element, the Community Development Model, and the LEED ND Smart Location Requirement. Unless you resort to Accretive’s fiction that there is no existing community (and by extension, no existing “community character” to the western Valley Center neighborhood) plopping an urban project the size of Del Mar into a rural, predominantly agricultural area designated for Semi-Rural uses, would be in significant contradiction to the “character of surrounding development.” Once again the GP requires developers to comply with the applicable Community Plan. That is the most effective way to meet the GP Goal LU-2, to maintain the county’s rural character. This Project is inconsistent with the Semi-Rural land use designations established by the GP and CP for this area, as well as all the Guiding Principles, as previously pointed out.

V. Community Plan Inconsistencies

A. Community Character Goals

*Preserve and enhance the rural character by “maintaining a pattern of land use consistent with the following regional categories: **Village.** Enhance the rural village character of valley center’s north and south villages... **Semi-Rural:** Preserve and maintain the overall rural and agricultural character of the semi-rural areas....”*

Policy 1 “Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.

Policy 2. Prohibit monotonous tract developments

Comment: The SP and DEIR cannot avoid the clear violation of these provisions by the fiction of merely adopting a new Map showing three Villages instead of two. The rural character of the project site, indeed all of the Planning Area, will be destroyed by plopping an urbanized area the size of Del Mar in the middle of an active agricultural area. Destruction of a designated Semi-Rural agricultural area cannot be interpreted to be “preservation.” The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

B. Land Use Goals

“Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained.

“A pattern of development that conserves Valley Center’s natural beauty and resources, and retains Valley Center’s rural character.”

“Development that maintains Valley Center’s rural character through appropriate location and suitable site design.”

Comment: The SP and DEIR cannot avoid the clear violation of these provisions. Adding a third Village is inconsistent with establishing two existing Villages, consistent with both the GP and CP, the Community Development Model, and the Smart Location requirements of LEED ND. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

C. Village Boundaries Map

Comment: The SP and DEIR cannot avoid the clear violation of the existing Map, which shows the two, not three villages, by the fiction of merely adopting a new Map showing three Villages instead of two addresses the resulting conflicts with numerous other GP and CP provisions. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

D. Rural Compatibility

“Require new development to adhere to design standards consistent with the character and scale of a rural community. Particularly important: roads follow topography and minimize grading; built environment integrated into the natural setting and topography; grading that follows natural contours and does not disturb the natural terrain; structure design and siting that that allows preservation of the site’s natural assets; retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas.”

“Require new residential development to construct roads that blend into the natural terrain and avoid “urbanizing” improvements, such as widening, straightening, flattening and the installation of curbs, gutters and sidewalks. Follow Valley Center’s Community Right of Way Development Standard.”

“Buffer residential areas from incompatible activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space.”

Comment: Neither the SP nor the DEIR is clear as to which design standards apply. The SP purports to override all county documents and states it prevails over any inconsistent provisions in the GP, CP, ordinances or design guidelines. In other places it states some aspect of the project is consistent with the VC Design Guidelines, implying that they would, nevertheless, be applicable. The many pictures, instead of clear text, clearly show urbanized design, out of scale and character for a rural community. The massive grading replaces natural hills with manufactured slopes to accommodate urban design, ignoring natural topography for both roads and residences. The request for deviations from road standards is also in direct conflict with these provisions in the Community Plan. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

E. Commercial Goals

“Prohibit strip commercial development by containing commercial uses in the Cole Grade and Valley Center Road area and the Mirar de Valle Road and Valley Center

Road area. Application of the Semi-Rural Land Use Designation to currently zoned commercial properties located outside the Villages.”

Comment: Neither the SP nor the DEIR deals with the fundamental fact that the CP establishes commercial uses only in the two existing Villages, and eliminates commercial uses elsewhere, consistent with smart growth principles and the Community Development Model. The Semi-Rural Land Use Designation for the Project Site is required by both the GP and SP to remain so. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

F. Agricultural Goals

“Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure continuation of an important rural lifestyle in Valley Center.

Prohibit residential development which would have an adverse impact on existing agricultural uses.”

Comment: Neither the SP nor the DEIR addresses this major thrust of both the GP and CP to “support” Agriculture, not destroy it. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

G. Mobility Goals

“ Road design shall reflect the rural character and needs unique the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated.”

“Road alignment shall minimize the necessity of altering the landscape by following as much as possible the contours of the existing natural topography without sacrificing safety or sight distance criteria.”

“Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines.”

Policy 12: *“ Where a clear circulation need that benefits the overall community, public roads consistent with DPW policy shall be dedicated and constructed. Future subdivisions access public roads via at least two separate access points.”*

Comment: As noted above, neither the SP nor the DEIR is clear as to which design standards apply. There appears to have been no consideration of whether this Project can provide two separate LEGAL access points to public roads or if other public roads within the project would provide a clear circulation need that benefits the entire community are needed (to replace proposed private roads. The massive grading proposed seems a clear violation of the requirement for minimizing altering the landscape and following existing natural topography. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

H. Fire Protection Goals

“ New development using imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards.”

Comment: The continued objections of the Deer Springs Fire District to this Project negate compliance with this requirement, yet the SP and DEIR continue blithely on, as if

no objections or deficiencies exist. The DEIR must, but does not, explain and analyze the environmental effects of this discrepancy.

I. School Facilities

“Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding.”

Comment: No school district has accepted the possible additional students generated by the Project. The residential construction will precede, not be coincident with, school construction. The potential school site is conditioned to be turned into additional residences if not accepted by a school district. The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

J. Open Space Goals

“Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space.”

Comment: The SP only tentatively designates a 12-acre public park site. The Project minimally meets the PLDO ordinance 3-acres per 1,000 population requirement, falling woefully short of the 10-acres per 1,000 GP goal for parks. At least 350 homes will be constructed and occupied before any parks, public or private. The SP makes no provision for construction of park amenities, just dedication of raw land. Overall Project site planning appears to destroy any existing connectivity for animal migration, instead of creating or maintaining a functional open space system. The design is to create an isolated urbanized compound totally unrelated to its surroundings. This will be a closed community of urban sprawl, not one with “openness and access to surrounding open space.” The DEIR must, but does not, explain and analyze the environmental effects of these discrepancies.

- 1. BOTH the Specific Plan and the DEIR for the project fail to substantiate consistency with CEQA or consistency with the San Diego GP policies that would justify exemption of this project from prohibition of Leap Frog Development,**
- 2. The DEIR fails to disclose environmental impacts and/or provide adequate mitigation for this project.**
- 3. Decision makers and the public are deprived of this essential information which is required by CEQA.**
- 4. These failures require re-circulation of a revised DEIR that addresses them.**

ATTACHMENT I.

SELECTED BRIEF EXCERPTS FROM LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT

*“...**Unlike other LEED rating systems**, which focus primarily on green building practices and offer only a few credits for site selection and design, **LEED for Neighborhood Development places emphasis on the site selection, design, and construction elements that bring buildings and infrastructure together into a neighborhood and relate the neighborhood to its landscape as well as its local and regional context.***”

*The work of the LEED-ND core committee, made up of representatives from all three partner organizations, has been guided by sources such as the Smart Growth Network’s ten principles of smart growth, the charter of the Congress for the New Urbanism, and other LEED rating systems. LEED for Neighborhood Development creates a label, as well as guidelines for both decision making and development, to provide an incentive for better **location**, design, and construction of new residential, commercial, and mixed-use developments”*

LEED ND Overview and Process

The LEED 2009 for Neighborhood Development Rating System is a set of performance standards for certifying the planning and development of neighborhoods. The intent is to promote healthful, durable, affordable, and environmentally sound practices in building design and construction.

Prerequisites and credits in the rating system address five topics:

- Smart Location and Linkage (SLL)
- Neighborhood Pattern and Design (NPD)
- Green Infrastructure and Buildings (GIB)
- Innovation and Design Process (IDP)
- Regional Priority Credit (RPC)

When to Use LEED for Neighborhood Development

The LEED for Neighborhood Development Rating System responds to land use and environmental considerations in the United States. It is designed to certify exemplary development projects that perform well in terms of smart growth, urbanism, and green building. Projects may constitute whole neighborhoods, portions of neighborhoods, or multiple neighborhoods. There is no minimum or maximum size for a LEED-ND project, but the core committee’s research has determined that a reasonable minimum size is at

least two habitable buildings and that **the maximum area that can appropriately be considered a neighborhood is 320 acres, or half a square mile.**

...

This rating system is **designed primarily for** the planning and development of **new green neighborhoods, whether infill sites or new developments proximate to diverse uses or adjacent to connected and previously developed land.**

Many infill projects or projects near transit will be in urban areas, which helps direct growth into places with existing infrastructure and amenities. LEED-ND also promotes the redevelopment of aging brownfield sites into revitalized neighborhoods by rewarding connections beyond the site, walkable streets within the site, and the integration of any historic buildings and structures that will give the new neighborhood development a unique sense of place.

...

Size is a defining feature of a neighborhood and is typically based on a comfortable distance for walking from the **center** of the neighborhood to its edge; that suggests an area of 40 to 160 acres. In the 1929 Regional Plan of New York and Environs, urban planner Clarence Perry outlined a neighborhood center surrounded by civic uses, parks, residential uses, a school, and retail at the edge, all within one-quarter mile—about a 5-minute walk. This amounts to an area or pedestrian “shed” of 125 acres, or if the land area is a square, 160 acres. Although Perry’s diagram does not address many of the sustainable features of LEED-ND, such as access to multimodal transportation options, location of infrastructure, and building form, it serves as a reference point for the mix of uses and walkable scale of neighborhood development encouraged in the rating system. Most people will walk approximately one-quarter mile (1,320 feet) to run daily errands; beyond that, many will take a bicycle or car. Additional research shows that people will walk as far as a half-mile (2,640 feet) to reach heavy rail transit systems or more specialized shops or civic uses.

Since half a square mile contains 320 acres, the core committee has decided that this size should serve as guidance for the upper limit of a LEED-ND project.

SLL Prerequisite 1: Smart Location

Intent

To encourage development within and near existing communities and public transit infrastructure. To encourage improvement and redevelopment of existing cities, suburbs, and towns while limiting the expansion of the development footprint in the region to appropriate circumstances. To reduce vehicle trips and vehicle miles traveled (VMT). To reduce the incidence of obesity, heart disease, and hypertension by encouraging daily physical activity associated with walking and bicycling.

Requirements

FOR ALL PROJECTS

Either (a) locate the project on a site served by existing water and wastewater infrastructure or (b) locate the project within a legally adopted, publicly owned, planned water and wastewater service area, and provide new water and wastewater

infrastructure for the project.

AND

OPTION 1. Infill Sites

Locate the project on an infill site.

OR

OPTION 2. Adjacent Sites with Connectivity

Locate the project on an adjacent site (i.e., a site that is adjacent to previously developed land; see Definitions) where the connectivity of the site and adjacent land is at least 90 intersections/square mile as measured within a 1/2-mile distance of a continuous segment of the project boundary, equal to or greater than 25% of the project boundary, that is adjacent to previous development. Existing external and internal intersections may be counted

if they were not constructed or funded by the project developer within the past ten years. Locate and/or design the project such that a through-street and/or nonmotorized right-of-way intersects the project boundary at least every 600 feet on average, and at least every 800 feet, connecting it with an existing street and/or right of way outside the project; nonmotorized rights-of-way may count for no more than 20% of the total.

The exemptions listed in NPD Prerequisite 3, Connected and Open Community, do not apply to this option.

OR

OPTION 3. Transit Corridor or Route with Adequate Transit Service

Locate the project on a site with existing and/or planned transit service such that at least 50% of dwelling units and nonresidential building entrances (inclusive of existing buildings) are within a 1/4 mile walk distance of bus and/or streetcar stops, or within a 1/2 mile walk distance of bus rapid transit stops, light or heavy rail stations, and/or ferry terminals, and the transit service at those stops in aggregate meets the minimums listed in Table 1 (both weekday and weekend trip minimums must be met). Weekend trips must include service on both Saturday and Sunday. Commuter rail must serve more than one metropolitan statistical area (MSA) and/or the area surrounding the core of an MSA.

Table 1. Minimum daily transit service

	Weekday trips	Weekend
trips		
Projects with multiple transit types (bus, streetcar, rail, or ferry)	60	
40		
Projects with commuter rail or ferry service only	24	
6		

If transit service is planned but not yet operational, the project **must demonstrate one of the following:**

- a. The relevant **transit agency has a signed full funding grant agreement** with the Federal Transit Administration **that includes a revenue operations date for the start of transit service.** The revenue operations date must be **no later than**

the occupancy date of 50% of the project's total building square footage.

b. For bus, streetcar, bus rapid transit, or ferry service, the **transit agency must certify that it has an approved budget that includes specifically allocated funds sufficient to provide the planned service at the levels listed above and that service at these levels will commence no later than occupancy of 50% of the project's total building square footage.**

c. For rail service other than streetcars, the transit agency must certify that preliminary engineering for a rail line has commenced. In addition, the service must meet either of these two requirements: A state legislature or local subdivision of the state has authorized the transit agency to expend funds to establish rail transit service that will commence no later than occupancy of 50% of the project's total building square footage.

OR

A municipality has dedicated funding or reimbursement commitments from future tax revenue for the development of stations, platforms, or other rail transit infrastructure that will service the project no later than occupancy of 50% of the project's total building square footage.”

The “Project Checklist” for LEED ND Certification lists mandatory requirements and shows the range of concerns that LEED ND addresses. All of these areas should be addressed before the Accretive project can be declared consistent with the LEED ND standard. None of this analysis has been done.

**LEED 2009 FOR NEIGHBORHOOD DEVELOPMENT
PROJECT CHECKLIST**

SMART LOCATION and LINKAGE

These are PRE-REQUISITE criteria. Compliance is mandatory.

Prerequisite 1 Smart Location

Prerequisite 2 Imperiled Species and Ecological Communities

Prerequisite 3 Wetland and Water Body Conservation

Prerequisite 4 Agricultural Land Conservation

Prerequisite 5 Floodplain Avoidance

These are areas of focus and relative priority for LEED ND SMART LOCATION & LINKAGE points and should also be addressed

Credit 1 Preferred Locations 10

Credit 2 Brownfield Redevelopment 2

Credit 3 Locations with Reduced Automobile Dependence 7

Credit 4 Bicycle Network and Storage 1

Credit 5 Housing and Jobs Proximity 3

- Credit 6 Steep Slope Protection 1
- Credit 7 Site Design for Habitat or Wetland and Water Body Conservation 1
- Credit 8 Restoration of Habitat or Wetlands and Water Bodies 1
- Credit 9 Long-Term Conservation Management of Habitat or Wetlands and Water Bodies 1

NEIGHBORHOOD PATTERN AND DESIGN

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Walkable Streets
- Prerequisite 2 Compact Development
- Prerequisite 3 Connected and Open Community

These are areas of focus and relative priority for LEED ND NEIGHBORHOOD PATTERN and DESIGN points and should also be addressed

- Credit 1 Walkable Streets 12
- Credit 2 Compact Development 6
- Credit 3 Mixed-Use Neighborhood Centers 4
- Credit 4 Mixed-Income Diverse Communities 7
- Credit 5 Reduced Parking Footprint 1
- Credit 6 Street Network 2
- Credit 7 Transit Facilities 1
- Credit 8 Transportation Demand Management 2
- Credit 9 Access to Civic and Public Spaces 1
- Credit 10 Access to Recreation Facilities 1
- Credit 11 Vistability and Universal Design 1
- Credit 12 Community Outreach and Involvement 2
- Credit 13 Local Food Production 1
- Credit 14 Tree-Lined and Shaded Streets 2
- Credit 15 Neighborhood Schools 1

GREEN INFRASTRUCTRE AND BUILDINGS

These are PRE-REQUISITE criteria. Compliance is mandatory.

- Prerequisite 1 Certified Green Building
- Prerequisite 2 Minimum Building Energy Efficiency
- Prerequisite 3 Minimum Building Water Efficiency
- Prerequisite 4 Construction Activity
- Prerequisite 5 Pollution Prevention

These are areas of focus and relative priority for LEED ND GREEN INFRASTRUCTURE AND BUILDINGS points and should also be addressed

- Credit 1 Certified Green Buildings 5
- Credit 2 Building Energy Efficiency 2
- Credit 3 Building Water Efficiency 1
- Credit 4 Water-Efficient Landscaping 1
- Credit 5 Existing Building Reuse 1

Credit 6 Historic Resource Preservation and Adaptive Use 1
Credit 7 Minimized Site Disturbance in Design and Construction 1
Credit 8 Stormwater Management 4
Credit 9 Heat Island Reduction 1
Credit 10 Solar Orientation 1
Credit 11 On-Site Renewable Energy Sources 3
Credit 12 District Heating and Cooling 2
Credit 13 Infrastructure Energy Efficiency 1
Credit 14 Wastewater Management 2
Credit 15 Recycled Content in Infrastructure 1
Credit 16 Solid Waste Management Infrastructure 1
Credit 17 Light Pollution Reduction 1

INNOVATION AND DESIGN PROCESS

Credits are given for conducting an exemplary process

Credit 1 Innovation and Exemplary Performance 1–5
Credit 2 LEED® Accredited Professional 1

Regional Priority Credit 4 possible points

Credit 1 Regional Priority 1–4

**ATTACHMENT II
ACCRETIVE PROJECT ISSUE CHECKLIST 6/13/12**

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilac Hills Ranch Master Planned Community					Project Number(s): 3800 12-001 (GPA), 3910 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)	
PDS (Department of Planning & Development Services) Planning and CEQA Comments						
Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified	
11	31	Fire Protection Plan	Please remove the discussion regarding Solar Photovoltaic Power System. The Specific Plan does not include any provisions for a solar facility.	The FPP has been revised to address the the comments from the Deer Springs FPD and County Fire Authority.	8/14/12 12/10/12 3/20/13	
11	32	Fire Protection Plan	Please update the phasing exhibit to address the previous comments.	The FPP has been revised to address the the comments from the Deer Springs FPD and County Fire Authority.	8/14/12 12/10/12 3/20/13	
12	1	General Comment	Please clarify the acreage of the project site and the number of properties (parcels) throughout the technical studies.		8/14/12	
12	2	General Comment	Please clarify the number of parcels within the project area throughout the technical studies.		8/14/12	
13	1	General Plan Conformance	The project remains inconsistent with the land use map and numerous General Plan and Community Plan policies. Please see the General Plan Conformance Review attached to this letter for additional information. The project also appears to be inconsistent with the Community Plan policies identified below. Please review the policies and indicate to staff how you would propose to revise these policies or if you disagree with staff's analysis. Some of the policies identified below may not be an issue based on a review of the technical documents requested. <u>The analysis of the projects consistency with these policies will be updated upon acceptance of the technical studies.</u>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13	
13	2	General Plan Conformance - Bonsall Community Plan	Goal LU-1.1 A unique balance of Bonsall's rural agriculture, estate lots, ridgelines, equestrian uses, and open space land uses within the community, including open space and low density buffers that separate the community from adjacent cities and unincorporated community and new development that conserves natural resources and topography.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13	

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

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PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	11	General Plan Conformance - Bonsall Community Plan	Policy LU-2.1.1 Encourage development inside the Village boundaries (see Figure 3) which are centered around the Mission Road/Olive Hill Road and State Route 78 intersections.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	12	General Plan Conformance - Bonsall Community Plan	Goal LU-2.2 The San Luis Rey River Valley retains its rural character, while urbanized development remains within neighboring cities that are discouraged from annexing areas of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	13	General Plan Conformance - Bonsall Community Plan	Goal LU-3.1 Estate lot residential development that provides adequate housing opportunities for all residents, while maintaining and enhancing the existing rural atmosphere of the community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	14	General Plan Conformance - Bonsall Community Plan	Policy LU-3.1.2 Require subdivision design to minimize adverse impacts to community character, or to the environment, and to mitigate any impacts from other constraints on the land that could not be avoided. Require mitigation actions to remain within the CPA.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	15	General Plan Conformance - Bonsall Community Plan	Policy LU-31.3 Buffer residential areas from incompatible activities, which create heavy traffic, noise, dust, unsightly views, or from incompatibility with the surrounding environment.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	16	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.2 Require grading to be contoured to blend with natural topography, rather than consist of straight edges.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	17	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.3 Minimize grading to preserve natural landforms, major rock outcroppings and areas of existing mature trees. Integrate hillside development with existing topography and landforms.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	18	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.4 Restrict, to the maximum extent feasible, extensive grading for development projects in areas with slopes that are 20 percent or greater, in order to preserve and protect the environment, and to lessen grading and erosion.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	19	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.5 Require development on slopes to be stepped to follow and preserve topography to the maximum extent feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	20	General Plan Conformance - Bonsall Community Plan	Policy LU-5.1.6 Minimize cut and fill grading for roads and access ways to the absolute minimum necessary.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	21	General Plan Conformance - Bonsall Community Plan	Goal LU-5.2 The preservation of groundwater resources, community character and protection of sensitive resources in the Bonsall Community Planning Area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	22	General Plan Conformance - Bonsall Community Plan	<p>Policy LU-5.2.1 Require lot sizes, except through planned development, lot area averaging or specific plan projects, to be no smaller than:</p> <ul style="list-style-type: none"> • 50 percent of the density indicated on the Land Use Map, without clustering or lot averaging, for Semi Rural 4 and higher densities, or • Four acres for Semi Rural 10 and lower densities. <p>Implementation LU-5.2.1 Zoning Ordinance</p> <p>Policy LU-5.2.2 Allow further reductions in minimum lot sizes indicated in Policy LU-5.2.1, through Planned Development, Lot Area Averaging, or Specific Plan projects only when setbacks, building scale, and design are appropriate to retain the equestrian and agricultural community character in the area.</p> <p>Example: Semi Rural 2 establishes a density of one dwelling unit per two acres. Fifty percent of that density would result in a minimum lot size of one acre.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

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PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	23	General Plan Conformance - Bonsall Community Plan	Policy LU-5.2.2 Allow further reductions in minimum lot sizes indicated in Policy LU-5.2.1, through Planned Development, Lot Area Averaging, or Specific Plan projects only when setbacks, building scale, and design are appropriate to retain the equestrian and agricultural community character in the area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	24	General Plan Conformance - Bonsall Community Plan	Goal LU-6.1 Infrastructure and public utilities that are provided concurrent to development in a manner compatible with community character while minimizing visual and environmental impacts.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	25	General Plan Conformance - Bonsall Community Plan	Policy LU-6.1.2 Provide development on an orderly, phased basis so that it will not overload public facilities.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	26	General Plan Conformance - Bonsall Community Plan	Goal LU-7.1 An adequate supply of water that meets current and projected needs of both residential and agricultural users in Bonsall CPA.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	27	General Plan Conformance - Bonsall Community Plan	Goal CM-1.1 A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian and pedestrian users.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	28	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.1 Reduce traffic volume on roads recognized as future "poor level of service" with methods such as, but not limited to, providing alternate routes and reducing density.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	29	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.3 Coordinate with Caltrans to design and construct State Route 76, East Vista Way (S13), and Interstate 15 to efficiently carry traffic through the Bonsall CPA. Design and construct interior roads, such as Camino del Rey, West Lilac, Gopher Canyon, and Olive Hill to carry primarily local traffic and remain rural to the degree consistent with safety requirements.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilac Hills Ranch Master Planned Community

**Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP)
003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005
3500 12-017 (STP), 3500 12-018 (STP)**

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	30	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.4 Prioritize the preservation and protection of sensitive habitats, such as wetlands, over road location, relocation, or realignment. Encourage all mitigation to be on-site and site-specific. Require mitigation within the Bonsall CPA where on-site and site-specific mitigation is not appropriate, whenever feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	31	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.5 Minimize direct access points onto Mobility Element roads to produce unimpeded traffic flow in commercial areas. Require new Commercial development to provide, where possible, indirect access through the use of existing road access points, loop, or frontage roads, common driveways or similar means.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	32	General Plan Conformance - Bonsall Community Plan	Policy CM-1.1.6 Minimize the use of cul-de-sacs in the Bonsall CPA and require new subdivisions to provide local connectivity by providing linkages for long-term circulation improvement.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	33	General Plan Conformance - Bonsall Community Plan	Goal CM-4.1 A circulation system which preserves the rural character of the community and provides a safe, balanced transportation system, which includes automobile, bicycle, equestrian, and pedestrian users.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	34	General Plan Conformance - Bonsall Community Plan	Policy CM-4.1.2 Prohibit the use of all on street parking on Mobility Element Roads outside the Village Boundaries and require development to provide adequate onsite parking.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	35	General Plan Conformance - Bonsall Community Plan	Goal CM-5.1 Scenic routes where community character and natural resources are preserved by minimizing the impacts of public or private development along roadways in Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	36	General Plan Conformance - Bonsall Community Plan	Policy CM-5.1.1 Design, maintain and/or improve scenic areas, road alignments, and realignments to minimize the alteration of the natural landform by following the contours of the existing, natural topography without sacrificing safety or sight distance criteria.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (P), 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	37	General Plan Conformance - Bonsall Community Plan	Goal COS-1.1 The preservation of the unique natural and cultural resources of Bonsall and the San Luis Rey River and associated watershed, with continued support for its traditional rural and agricultural life-style.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	38	General Plan Conformance - Bonsall Community Plan	Policy COS-1.1.4 Require development to be compatible with adjacent natural preserves, sensitive habitat areas, agricultural lands, and recreation areas, or provide transition or buffer areas.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	39	General Plan Conformance - Bonsall Community Plan	Goal COS-1.2 The continuation of agriculture as a prominent use throughout the Bonsall community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	40	General Plan Conformance - Bonsall Community Plan	Policy COS-1.2.1 Encourage the protection of areas designated for agricultural activities from scattered and incompatible urban intrusions, along with the provision of greenbelt/buffers between agricultural zoning and urban zoning.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	41	General Plan Conformance - Bonsall Community Plan	Policy COS-1.2.2 Encourage the use of agriculture easements in the CPA, especially as part of the Conservation Subdivision Program, while maintaining community character with rural and semi-rural homes.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	42	General Plan Conformance - Bonsall Community Plan	Policy COS-1.2.3 Require development to minimize potential conflicts with adjacent agricultural operations, through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture and support local and state right-to-farm regulations.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT NAME: Lilac Hills Ranch Master Planned Community **Project Number(s):** 3800 12-001 (GPA), 3810 12-001 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	50	General Plan Conformance - Bonsall Community Plan	Policy COS-2.1.1 Encourage the acquisition and development of parklands that will protect outstanding, scenic, and riparian areas, and cultural, historical, and biological resources.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	51	General Plan Conformance - Bonsall Community Plan	Policy COS-2.1.4 Require appropriate wetland preservation buffers in recreational facilities located adjacent to wetlands to use parkland to provide a transition to the wetland buffer area and buffers for additional passive recreational uses, as permitted.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	52	General Plan Conformance - Bonsall Community Plan	Policy COS-2.1.5 Coordinate with the Bonsall Community Sponsor Group on the future siting, naming, and planning of community parks in Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	53	General Plan Conformance - Bonsall Community Plan	Policy COS-3.1.1 Encourage agricultural and equestrian open spaces and only encourage linking of open space if it is biological and supports a wildlife corridor system.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	54	General Plan Conformance - Bonsall Community Plan	GOAL S-1 Adequate law enforcement, fire protection, and emergency services that contribute to a safe living and working environment for the residents of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	55	General Plan Conformance - Bonsall Community Plan	Policy S-1.1 Support the provision of adequate law enforcement, fire protection, and emergency services for the residents of Bonsall.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	56	General Plan Conformance - Bonsall Community Plan	GOAL N-1 Protect and enhance Bonsall's acoustical environment by supporting the control of noise at its source, along its transmission path and at the site of sensitive receivers. Maintain an environment free of excessive noise by providing control of noise at its source.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	57	General Plan Conformance - Bonsall Community Plan	Policy N-1.1 Require site design and building design controls to minimize noise emissions from noise sources.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP) 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	58	General Plan Conformance - Bonsall Community Plan	Policy N-1.2 Encourage land use and circulation patterns, which will minimize noise in residential neighborhoods and sensitive wildlife habitat.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	59	General Plan Conformance - Bonsall Community Plan	Policy N-1.3 Support limiting truck traffic to designated routes to reduce noise in residential areas.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	60	General Plan Conformance - Bonsall Community Plan	Section 6. Specific Plans and Special Study Areas.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	61	General Plan Conformance - Valley Center Community Plan	The Background section of the Valley Center Community Plan indicates that the "2010 SANDAG estimates for population and housing in the Valley Center CPA identify a population of 17,582 with a total of 6,573 housing units." The project would further increase the population and total number of housing units within the community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 (TM), 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	62	General Plan Conformance - Valley Center Community Plan	<p>Community Character Goal Preserve and enhance the rural character of Valley Center by maintaining a pattern of land use consistent with the following regional categories.</p> <p>a. Village Enhance the rural village character of valley center's north and south villages defined by the current nodes of industrial, commercial and higher density village residential land use designations.</p> <p>b. Semi-rural lands preserve and maintain the overall rural and agricultural character of the semi-rural areas.</p> <p>c. Rural lands preserve and maintain the overall rural and agricultural character of the rural lands area outside the semi-rural area.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	63	General Plan Conformance - Valley Center Community Plan	Figure 2, Valley Center Context Map.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	64	General Plan Conformance - Valley Center Community Plan	Community Character Policy 1: Require that future projects are consistent with the goals, policies, and recommendations contained in the Valley Center Community Plan.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	65	General Plan Conformance - Valley Center Community Plan	Community Character Policy 2: Maintain the existing rural character of Valley Center in future developments by prohibiting monotonous tract developments. Require site design that is consistent with the rural community character.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT NAME: Lilac Hills Ranch Master Planned Community

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PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	66	General Plan Conformance - Valley Center Community Plan	<p>Land Use General Goals Two economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained.</p> <p>A pattern of development that conserves valley center's natural beauty and resources, and retains valley center's rural character.</p> <p>A pattern of development that accommodates people of diverse ages, lifestyles, occupations, and interests with opportunities for village, semi-rural and rural living.</p> <p>Development that maintains valley center's rural character through appropriate location and suitable site design.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	67	General Plan Conformance - Valley Center Community Plan	Figure 3, Valley Center Village Boundaries	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	68	General Plan Conformance - Valley Center Community Plan	<p>A. Environmental Concerns and Issues:</p> <ol style="list-style-type: none"> 1. Require that discretionary permits preserve environmentally significant and/or sensitive resources such as undisturbed steep slopes, canyons, floodplains, ridge tops and unique scenic views in order to reinforce the rural character of the area through sensitive site design and, where appropriate, with open space easements. 2. Require preservation of unique features such as oak woodlands, riparian habitats, steep slopes, archaeological sites, and ecologically sensitive areas. 3. Prohibit ridgeline residential development unless it can be shown through a viewshed analysis that there would be only minimal impact to adjacent properties. 	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

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**Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP)
003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005
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PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	69	General Plan Conformance - Valley Center Community Plan	<p>B. Rural Compatibility Issues:</p> <p>4. Require new residential development to adhere to site design standards which are consistent with the character and scale of a rural community. The following elements are particularly important:</p> <ul style="list-style-type: none"> • Roads that follow topography and minimize grading; • Built environment that is integrated into the natural setting and topography; • Grading that follows natural contours and does not disturb the natural terrain; • Structure design and siting that allows preservation of the site's natural assets; • Retention of natural vegetation, agricultural groves, rock outcroppings, riparian habitats and drainage areas. <p>5. Require new residential development to construct roads that blend into the natural terrain and avoid "urbanizing" improvements such as widening, straightening, flattening and the installation of curbs, gutters, and sidewalks. Follow Valley Center's Community Right of Way Development Standards.</p> <p>6. Buffer residential areas from incompatible activities which create heavy traffic, noise, odors, dust, and unsightly views through the use of landscaping and preservation of open space.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	70	General Plan Conformance - Valley Center Community Plan	<p>Clustering</p> <p>7. Clustering, planned development, lot area averaging, and Specific Plan projects which utilize the clustering technique shall in no instance within the Valley Center CPA be used to create a greater number of lots than the property would have been entitled to without the use of the above mentioned techniques. Yield calculations shall be subject to the Resource Protection Ordinance.</p> <p>8. Once the appropriate number of lots has been established, the developer may elect to "cluster" or "lot area average" to lots of a minimum 0.5 acre in size in a Specific Plan Area Land Use Designation, no minimum lot size in the Village Area and a minimum lot size of 0.5 acre in size in SR-1, 1 acre in SR-2, 2 acres in SR-4, and 2.5 acres in SR-10 provided the project is sewerred, and providing that:</p> <p>a. The property contains significant environmental resources (such as important, rare, or endangered biological and/or animal habitat, floodplains, drainages, rock outcroppings, or archaeological and cultural resources) which would best be protected and preserved through the irrevocable dedication of these areas as Open Space easements to the County or another approved conservation agency.</p> <p>AND:</p> <p>b. Forty (40) percent of the gross acreage of the property is placed into permanent open space. Whenever possible, a link should be provided between all open space uses within the property.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	71	General Plan Conformance - Valley Center Community Plan	<p>Commercial Goals</p> <p>1. Prohibit strip commercial development by containing commercial uses in the Cole Grade Road and Valley Center Road area and the Mirar de Valle Road and Valley Center Road area.</p>	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-001
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PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	72	General Plan Conformance - Valley Center Community Plan	2. Require new commercial development to comply with the Design Guidelines for Valley Center including, but not limited to, the retention of significant natural features characteristic of the community's landscape. Existing topography, land forms, drainage courses, rock outcroppings, vegetation and viewshed shall be incorporated in the design of the future development of commercial land via the "B" Community Design Area.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	73	General Plan Conformance - Valley Center Community Plan	3. Ensure that all commercial areas are served by Mobility Element roads or local roads which meet the standards of the County of San Diego. Whenever possible, require new commercial development to provide secondary road access as opposed to access from major through roads.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	74	General Plan Conformance - Valley Center Community Plan	4. Commercial and civic uses shall be located in areas which have adequate roads for circulation and provide easy and safe multi-purpose pathways and trails.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	75	General Plan Conformance - Valley Center Community Plan	5. Future commercial development shall be planned so that strip commercial development will be avoided.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	76	General Plan Conformance - Valley Center Community Plan	6. Commercial/civic uses shall not interfere either functionally or visually with adjacent land uses or the rural atmosphere of the community.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	77	General Plan Conformance - Valley Center Community Plan	7. Commercial/civic uses shall be periodically reviewed to ensure that the standards for noise, light, traffic, odors and all other conditions of approval are continuing to be met.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	78	General Plan Conformance - Valley Center Community Plan	8. Discourage commercial and civic uses outside of the Villages and limit all such uses to those that are clearly demonstrated as needed and which are compatible with the rural lifestyle of the Valley Center Community Plan.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

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PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	79	General Plan Conformance - Valley Center Community Plan	9. The application of Land Use Designation Semi-Rural 2and Regional Category of Semi-Rural Lands are proposed for those properties that are currently zoned commercial and are located outside of the Villages.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	80	General Plan Conformance - Valley Center Community Plan	Agricultural Goals 1. Support agricultural uses and activities throughout the CPA, by providing appropriately zoned areas in order to ensure the continuation of an important rural lifestyle in Valley Center.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	81	General Plan Conformance - Valley Center Community Plan	3. Prohibit residential development which would have an adverse impact on existing agricultural uses.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	82	General Plan Conformance - Valley Center Community Plan	Specific Plan Areas (SPA) section.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	83	General Plan Conformance - Valley Center Community Plan	Figure 4: Valley Center Generalized Specific Plans.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	84	General Plan Conformance - Valley Center Community Plan	Mobility Goals 1. Where appropriate, minimize private driveway and private road access on to Mobility Element roads.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	85	General Plan Conformance - Valley Center Community Plan	2. Road design shall reflect the rural character and needs unique to the Planning Area. For example, turn radii shall be such that agricultural vehicles and equestrian rigs can be safely accommodated.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	86	General Plan Conformance - Valley Center Community Plan	3. Conflicting traffic movements such as uncontrolled access and uncontrolled intersections shall be minimized.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

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Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	87	General Plan Conformance - Valley Center Community Plan	4. Road alignment shall minimize the necessity of altering the landscape by following, as much as possible, the contours of the existing, natural topography without sacrificing safety or sight distance criteria.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	88	General Plan Conformance - Valley Center Community Plan	5. Required roadside and median landscaping shall reflect standards as outlined in the Valley Center Design Guidelines.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	89	General Plan Conformance - Valley Center Community Plan	6. Existing trees and vegetation located within the "Right-of-Way" of all public roads, and determined to be of significant visual benefit shall be transplanted or replaced consistent with the Valley Center Design Guidelines.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	90	General Plan Conformance - Valley Center Community Plan	7. To promote unimpeded traffic flow in commercial areas, minimize direct access points on to Mobility Element roads by recommending new commercial development to provide indirect access through the use of existing road access points, loop or frontage roads, common driveways or similar means.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	91	General Plan Conformance - Valley Center Community Plan	8. Woods Valley Road from Valley Center Road, east to Paradise Mountain Road and, Lilac Road from Old Castle Road to Highway 78 are significant aesthetic resources. Future improvements should maintain as much of their original character as possible without compromising safety.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	92	General Plan Conformance - Valley Center Community Plan	9. Require that the road system function at a service level no worse than "C" at peak hours as development occurs.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	93	General Plan Conformance - Valley Center Community Plan	10. Right-of-way development standards for private roads shall be compatible with the standards as outlined in Policy 8 of this section.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilac Hills Ranch Master Planned Community

**Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP)
003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005
3500 12-017 (STP), 3500 12-018 (STP)**

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	94	General Plan Conformance - Valley Center Community Plan	11. Implement community right-of-way development standards for the Valley Center Planning Area to achieve a rural character and alternative features within the shoulder portion of dedicated right-of-way. Such improvements will identify the community's desire to modify County development standards permitted by Board of Supervisors Policy J-36. These standards shall include: a. Provide decomposed granite walking/jogging paths in lieu of sidewalks; b. Where edge of pavement barrier is necessary, use mountable asphalt dike (smike dike); and c. Provide a bike lane within the "travel way".	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	95	General Plan Conformance - Valley Center Community Plan	12. Access to new subdivisions shall be carefully examined. Where a clear circulation need which benefits the overall community can be demonstrated, public roads consistent with Department of Public works policy shall be dedicated and constructed. Where appropriate, future subdivisions shall be required to access public roads via at least two separate access points.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	96	General Plan Conformance - Valley Center Community Plan	13. Safely separate pedestrian, equestrian and bicycle traffic from vehicular traffic when these modes share rights-of-way.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	97	General Plan Conformance - Valley Center Community Plan	Fire Protection Goals 1. All new development utilizing imported water shall provide infrastructure for fire suppression (such as pipes and hydrants) in accordance with the prevailing standards.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	98	General Plan Conformance - Valley Center Community Plan	3. New site locations for fire stations within the plan area should be centrally and strategically located.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilac Hills Ranch Master Planned Community

**Project Number(s): 3800 12-001 (GPA), 3810 12-001 (S
003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-00
3500 12-017 (STP), 3500 12-018 (STP)**

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	99	General Plan Conformance - Valley Center Community Plan	School Facilities 1. Coordinate school facility planning with residential development to ensure that school facilities will be available to accommodate the increase in enrollment without overcrowding.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	100	General Plan Conformance - Valley Center Community Plan	2. Develop schools in conjunction with neighborhood and community recreation facilities.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	101	General Plan Conformance - Valley Center Community Plan	Water Service Goal 2. The delivery of imported water service to the CPA shall be coordinated and the infrastructure adequately sized so that service can be provided to all land within the Valley Center Municipal Water District Territory in a cost effective manner.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	102	General Plan Conformance - Valley Center Community Plan	Open Space Goals 3. Incorporate publicly and semi-publicly owned land into a functional recreation/open space system wherever feasible.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	103	General Plan Conformance - Valley Center Community Plan	5. Design new residential development in a way that preserves an atmosphere of openness and access to surrounding open space.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	104	General Plan Conformance - Valley Center Community Plan	Parks and Recreation Goals 3. Development of local and neighborhood park and recreation facilities will be coordinated with local school facilities whenever possible by establishing Joint Powers Agreements to promote joint development, operation and maintenance.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13
13	105	General Plan Conformance - Valley Center Community Plan	7. All park lands dedicated in conjunction with the development of a Specific Plan Area (SPA) land use designation will consist of a reasonable amount of flat land suitable for play fields and other similar local park activities.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	6/14/12 12/10/12 3/20/13

**ATTACHMENT A
PROJECT ISSUE CHECKLIST**

PROJECT NAME: Lilac Hills Ranch Master Planned Community

Project Number(s): 3800 12-001 (GPA), 3810 12-001 (SP), 003 (REZ), 3100 5571 (TM), 3100 5572 (TM), 3300 12-005 3500 12-017 (STP), 3500 12-018 (STP)

PDS (Department of Planning & Development Services) Planning and CEQA Comments

Item	No.	Subject Area	Issue, Revision or Information Required	Issue Resolution Summary (Include Conditions)	Date Identified
13	108	General Plan Conformance - Valley Center Community Plan	8. Development of park facilities shall comply with the County's Ordinance No. 7155 relating to the regulation of Light Pollution.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	107	General Plan Conformance - Valley Center Community Plan	9. Provide riding and hiking trails, staging areas and other facilities within existing or proposed parks when appropriate to complement the Valley Center Trails System.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	108	General Plan Conformance - Valley Center Community Plan	Noise Goals 1. Develop and implement land use plans and circulation patterns that will minimize noise in residential neighborhoods.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	109	General Plan Conformance - Valley Center Community Plan	2. Permit residential development in areas with projected exterior Community Noise Equivalent Levels (CNELs) exceeding 60 decibels near main roads only when traffic noise impacts can be mitigated.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	110	General Plan Conformance - Valley Center Community Plan	3. Design subdivisions to retain natural and landscaped sound barriers in preference to earth berms or walls, where they are needed.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	111	General Plan Conformance - Valley Center Community Plan	4. Encourage the use of buffering devices on off-road vehicles and provide strict enforcement of noise regulations for off-road vehicles.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	112	General Plan Conformance - Valley Center Community Plan	5. Minimize traffic noise impacts by means of roadway alignment and design and the management of traffic flows.	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13
13	113	General Plan Conformance - Valley Center Community Plan	6. Encourage activities to increase public awareness of and enrollment in the Department of Agriculture program pursuant to the Agricultural Enterprises and Consumer Information Ordinance. (This Ordinance was designed to protect established farm operations from being declared a nuisance when following accepted agricultural practices.)	The projects conformance with the General Plan is addressed in the Specific Plan and Land Use section of the EIR.	8/14/12 12/10/12 3/20/13

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

Growth Assessment – Valley Center, Bonsall

Valley Center and Bonsall bear more than a fair share of San Diego County General Plan growth before addition of the proposed Lilac Hills Ranch project -- infrastructure plans will not support Lilac Hills Ranch growth

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

Table X-Y 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 is a General Plan Amendment, and is not included in the estimate of projected Housing Units in Table X-Y, 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. Because there are provisions in the General Plan to provide the requisite infrastructure to support village land use densities areas, the central Villages 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 Y-Z below:

Table Y-Z Bonsall and Valley Center Composite Housing Unit Analysis

					<i>% Growth from 2010</i>		
	<i>Housing Units</i>				2010 to	2020 to	2010 to
	2010	2020	2030	2050	2020	2030	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%

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

The County's Project Objectives from the DEIR for the proposed Accretive Investments Lilac Hills Ranch Subdivision are

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

The proposed project is based on a wide range of reports that studied the different constraints and opportunities involving the project in concert with the County of San Diego and local community issues. The general components of the proposed project were determined using the project objectives described below.

1. 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.
2. 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.
3. 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.
4. Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.
5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.
6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.
7. Provide the opportunity for residents to increase the recycling of waste.
8. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

below:

The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, preventing analyses of alternative sites that meet San Diego County General Plan objectives and leading to a self-serving and biased environmental analysis. *(Insert CEQA and Case cites here)*

The substantiation of this assertion is provided below.

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, already accommodates more growth than SANDAG projects. There is no 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.

The City of Escondido **SINCE 2007** has been developing an infill redevelopment mixed use Downtown Specific Plan Area (SPA) less than 14 miles south from the proposed Lilac Hill Ranch project. The Escondido Downtown SPA has a target Equivalent Dwelling Unit increase (EDU) of from 2,000 to 5,000 EDU.

Unlike the Accretive Project, the Escondido Project **meets Smart Growth and LEED-ND location requirements**, because it is an infill development with requisite infrastructure **truly within walking distance of the Escondido Transit Center** which has access to the Sprinter Train as well as being a hub for North County and Metropolitan Bus lines. Additionally, this location is less than a mile from access to I-15.

The Escondido Downtown SPA also provides a more viable solution for senior living facilities, including Assisted Living, because it is within two miles from the two Palomar Hospitals and major medical facilities.

The Escondido Downtown SPA document is available at the following link, that is also provided as Reference A.
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Please also compare the Escondido Downtown SPA level of specificity and completeness of design to that of the Accretive Lilac Hills Ranch Specific Plan.

Accretive also makes an unsubstantiated assertion that the Valley Center’s Village, designated by SANDAG as a “Smart Growth Opportunity Area” is not in close proximity to a major transportation corridor – **this is patently false**. 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 Community Plan has designated this area 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.

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** for the 1 ½ to 3 miles the Project needs to connect the 25,000 plus trips for this automobile based urban sprawl project with I-15.

Accretive does not have legal right-of-way to use Mountain Ridge and Covey Lane private roads for the purposes that Accretive proposes for the Project.

Accretive does not own legal right of way, nor can they achieve 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.

Accretive does not have legal right of way for offsite sewer and recycled water pipelines that they indicate on their Preferred Route 3 to the Lower Moosa Water Reclamation Facility.

For the County to state that this Project is in close proximity of a major transportation corridor without an analysis of the ability of this Project to safely manage its traffic burden and pay for the direct off-site impacts of the Project's congestive Level E and F Level of Service that the Project will directly cause **is misleading at best and not in compliance with CEQA and related State and County policies and Regulations.** *(Insert State CEQA and Subdivision Map Act issues; County Subdivision Ordinance and DPW Public and Private Road Design Standards)*

As is discussed below, in the new General Plan, unincorporated communities including Valley Center and Bonsall already accommodate more than their fair share of County growth. In keeping with the "Smart Growth" vision and guiding principles that are essential foundations for the entire County General Plan, growth in these communities has purposefully been 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 new County General Plan has applied this two-part vision to ensure that Valley Center and Bonsall absorb more than a fair share of San Diego County General Plan growth -- without overdeveloping green field areas.

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 is a 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%

Accretive states that the Project is “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.

The proposed Lilac Hills Ranch Subdivision is a classic urban sprawl development. All of the transportation will be via automobiles, and the road infrastructure does not support the 9 fold increase in traffic.

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 a subset of the San Diego General Plan. Why does the first Objective ignore the balance of the General Plan? Because the Proposed Project is patently inconsistent with the San Diego County General Plan, as well as the Community Development Model within the 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 ...”*

First, as the above statement in the County General Plan makes clear, 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 plopp 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. 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.

Summary and Conclusion – Objective One

The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.

(CEQA and Case cites that back the conclusion statement)

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, 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?**

Summary and Conclusion – Objective Two

The project does not meet its own Objective for Objective Two.

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.”

We do not have any issues with this Objective other than to state that **any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.**

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 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?**

Summary and Conclusion – Objective Four

The project does not meet its own Objective for Objective Four

Objective 5 – The full text is below:

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

We do not have any issues with this Objective **other than to state that any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.**

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.

In this Objective, **the County re-brands dense Urban Sprawl as a desired attribute.** The General Plan Alternate does not meet this objective, because it does not have Urban Densities.

This Objective is another example of where **the County has structured the Objectives of the EIR so narrowly with an planned bias that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.**

Objective 7 – The full text is below:

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

We do not have any issues with this Objective other than to state that having an on-site recycling facility is not the only opportunity to increase recycling of waste; with the huge amounts of waste the **Accretive Urban Sprawl (AUS)** creates one is necessary to marginally comply with Traffic Standards on trash day.

All of the Alternatives comply with this Objective equally

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.”

Developing the Project at General Plan densities and preserving agriculture and residential based businesses (such as the existing Accretive Agricultural Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this Objective **perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.**

Summary

The County has structured the Objectives of the EIR in aggregate so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. *(re- insert CEQA and Case cites here)*

Sincerely,

(Your Name)
(Your Street Address)
(Your City, State, and Zip)

Reference A: Escondido Downtown Specific Plan Area
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

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

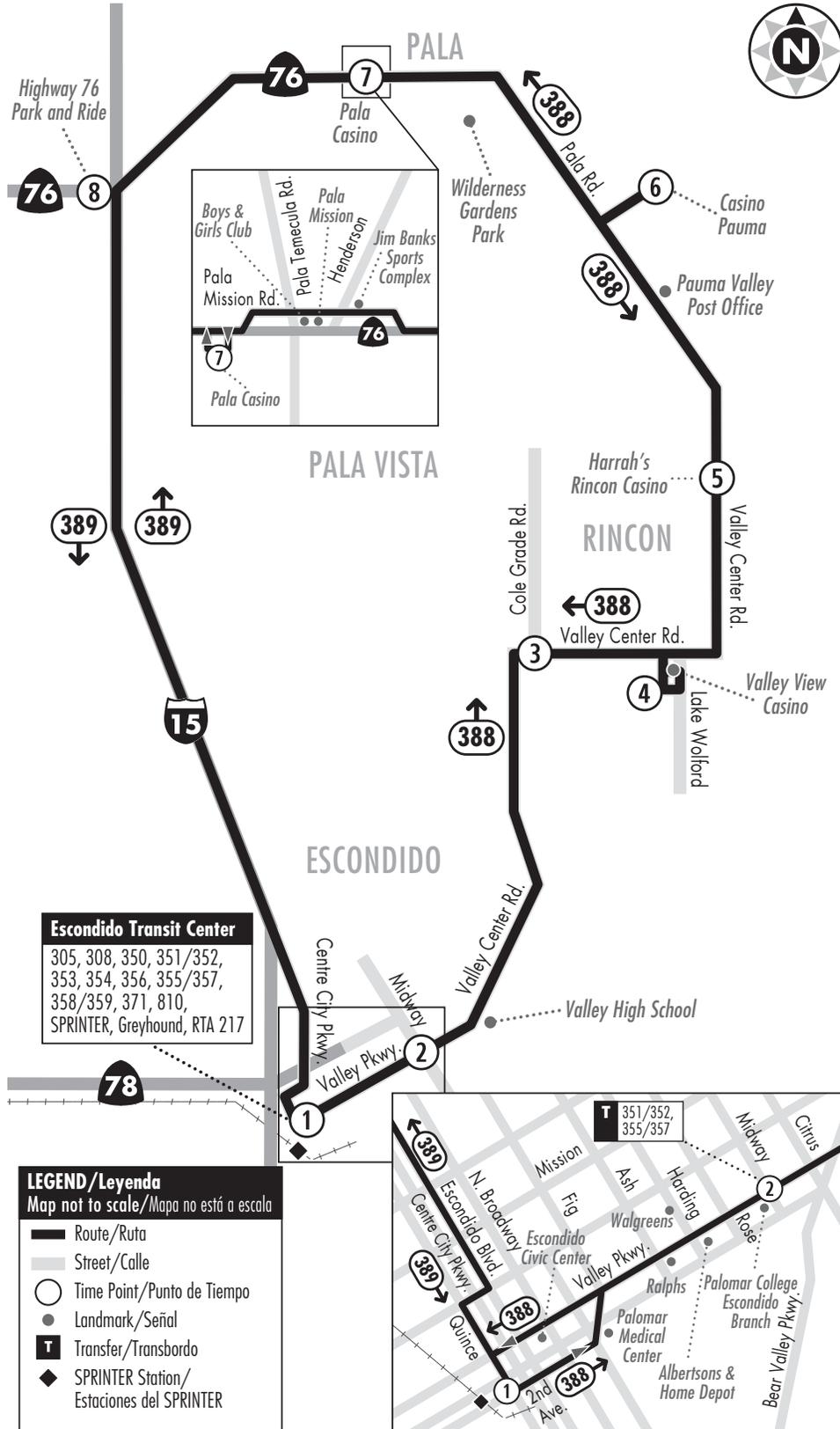
388/389

Escondido to Pala

M-F • SA • SU • H

Destinations/Destinos

- Palomar College Escondido Branch
- Regal Cinemas
- Palomar Medical Center
- Harrah's Rincon Casino
- Pala Casino
- Casino Pauma
- Valley View Casino
- East Valley Community Center
- Highway 76 Park and Ride



Bold denotes P.M. times/Horarios en negritas son en la tarde

388 Monday - Sunday						
Northbound to Pala via Valley Center						
Escondido Transit Center	Valley Pkwy. & Midway Dr.	Valley Center Rd. & Cole Grade Rd.	Valley View Casino	Harrah's Rincon Casino	Casino Pauma	Pala Casino
1	2	3	4	5	6	7
5:03	5:17	5:33	5:44	5:53	6:07	6:28 _a
7:03	7:18	7:38	7:50	8:01	8:16	8:46
9:03	9:18	9:35	9:48	10:02	10:22	10:52
11:03	11:20	11:39	11:52	12:03	12:23	12:48_p
1:03	1:21	1:40	1:53	2:04	2:23	2:50
3:03	3:21	3:39	3:53	4:05	4:22	4:49
5:03	5:23	5:42	5:54	6:05	6:22	6:49
7:03	7:23	7:42	7:54	8:05	8:20	8:44

388 Monday - Sunday						
Southbound to Escondido via Valley Center						
Pala Casino	Casino Pauma	Harrah's Rincon Casino	Valley View Casino	Valley Center Rd. & Cole Grade Rd.	Valley Pkwy. & Midway Dr.	Escondido Transit Center
7	6	5	4	3	2	1
7:05	7:25	7:46	8:03	8:12	8:32	8:44 _a
9:05	9:25	9:46	10:03	10:12	10:32	10:44
11:05	11:25	11:46	12:03	12:12	12:32	12:44_p
1:07	1:28	1:48	2:05	2:14	2:36	2:50
3:05	3:25	3:45	4:01	4:11	4:32	4:46
5:04	5:26	5:47	6:01	6:10	6:34	6:48
7:03	7:21	7:41	7:56	8:05	8:27	8:38
9:03	9:22	9:42	9:59	10:08	10:30	10:39

Routes 388 and 389 are funded in part by a federal 5311(c) grant received by the Reservation Transportation Authority.

Las Rutas 388 y 389 están respaldadas en parte por un subsidio federal 5311(c) recibido por la Autoridad de Transporte de las Reservas Indígenas.

388/389

Escondido to Pala

Bold denotes P.M. times/Horarios en negritas son en la tarde

389 Monday - Sunday Northbound to Pala via Interstate 15		
Escondido Transit Center	Highway 76 & Interstate 15	Pala Casino
1	8	7
6:03	6:31	6:53a
8:03	8:31	8:53
10:03	10:31	10:53
12:03	12:34	12:55p
2:03	2:32	2:53
4:03	4:33	4:52
6:03	6:33	6:51
8:03	8:32	8:52

389 Monday - Sunday Southbound to Escondido via Interstate 15		
Pala Casino	Highway 76 & Interstate 15	Escondido Transit Center
7	8	1
7:05	7:18	7:45a
9:05	9:17	9:44
11:05	11:18	11:46
1:07	1:20	1:47p
3:05	3:18	3:45
5:04	5:17	5:44
7:03	7:17	7:42
9:04	9:18	9:43

Routes 388 and 389 are funded in part by a federal 5311(c) grant received by the Reservation Transportation Authority.

Las Rutas 388 y 389 están respaldadas en parte por un subsidio federal 5311(c) recibido por la Autoridad de Transporte de las Reservas Indígenas.

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)

2.5 Biological Resources – Comments

2.5.1.2 Vegetation Communities

The Biological Resources Report [the Report] identifies three sensitive plant species present on-site: Engelmann oak, prostrate spineflower, and southwestern spiny rush. All three are on the County's List D of sensitive plant species and all three are reported as relatively small numbers of individuals. Do listed plants have to be represented on-site in large numbers to gain significance?

Is there quantitative data available to know whether the population sizes found on-site are significant within the region?

If not, how is it determined that a local population is insignificant?

Aren't rare, threatened or species of concern logically less numerous in most plant formations?

2.5.2 Analysis of Project Impacts and Determination of Significance

2.5.2.1 – Special Status Species

The Biological Resources Report [the Report] of the DEIR lists 13 federal/state species of special concern or Group 1 species of animals that would be impacted by the development of the Lilac Hills Ranch project [the Project] ranging from orange-throated whiptail lizards to southern mule deer. Reptiles and small mammals are judged to be at greatest risk for direct impact because they move more slowly and likely would suffer greater losses during construction activities, while larger mammals and birds are more mobile and could possibly escape to somewhere else more easily. Is the DEIR saying that reptiles, amphibians and small mammals would likely be sacrificed for this Project given their relative immobility?

What are the population densities of amphibians, reptiles and small mammals that are likely to be extirpated by construction operations?

To where would birds and larger mammals be dispersed?

What are the territorial ramifications and chances of survival for these displaced species?

For some of the anticipated species that were not observed during the directed surveys, e.g. the coastal California gnatcatcher, it appears that the timing of the directed surveys took place during the less than optimum periods of July and August, the extreme end of the season. Although still within the survey guidelines, they were conducted during a very dry year, which minimizes the chance of sighting such species on-site.

The surveys were also compressed into a two-week period [3 surveys on three consecutive Tuesdays], which minimizes the chance of observing the gnatcatchers. Why were such directed surveys conducted so late during a dry year? Why were the surveys scheduled in such a compressed time period at the end of the season?

While reviewing the Attachment 1, Post-Survey Notification of Focused Surveys for Least Bell's Vireo [LBV] for the I-15/395 Master-Planned Community MPA, it was noticed that Figures 1, 2, & 3 indicate a much reduced Project area and boundary for the least Bell's vireo survey than is expected for the present Project. This seems to indicate that the survey was completed on a Project site that significantly differs from the present Project. How can the cited survey be appropriate and complete for the present Project?

The addition of considerable acreage since the May, June, & July 2011 LBV surveys means that the additional areas were not properly or adequately surveyed for least Bell's vireo. Will the applicant re-survey these new areas included in the present Project during the appropriate breeding season? The wetlands that are appropriate habitat for this species extend into the subsequently acquired acreage not represented on the submitted map.

Further, the Project boundaries shown to include the survey areas mapped in the Biological Resources Report for the coastal California gnatcatcher do not match the present Project boundaries. The survey maps [Figures 1, 2, & 3 of Attachment 2, Post-survey Notification of Focused Survey for Coastal California Gnatcatcher, I-15/395 Master Planned Community MPA] indicate a much reduced Project area and boundary for the gnatcatcher survey than is expected for the present Project. This seems to indicate that the survey was completed on a Project site that significantly differs from the present Project. How can the cited survey be appropriate and complete for the present Project?

The addition of considerable acreage since the July/August 2011 gnatcatcher surveys means that the additional areas were not properly or adequately surveyed for gnatcatchers. Will the applicant re-survey these new areas included in the present Project?

The Report suggests that although these anticipated species, and others not listed in the Report, would be impacted by habitat loss caused by grading, construction, and human occupation, it finds that the impacts would be:

"...less than significant given the wide ranges of the species and the fact that the project does not contain a regionally significant population of these species."

The analysis fails to:

1. Demonstrate with data or suggest what a regionally significant population for any of the cited species is;
2. Does not estimate the on-site population density of any of the cited species to allow a comparison of the site to the region;
3. And, does not explain how the scope of a species' range can exempt the loss of a local population. The loss of local populations or portions of local populations within a species' range does not affect the notional range of the species necessarily, but does

have significance in reducing the regional population of a species within the range boundaries.

Do the ranges they refer to include urban as well as undeveloped areas, agricultural as well as natural areas, and what is their extent and density?

Within cismontane San Diego County, most habitats and wildlife populations have a mosaic distribution as a result of human occupation and transportation corridors. To what extent has the historical range of any of these species already been diminished, making even small, local populations, like those on-site, significant?

On what basis was the determination made that on-site populations of the 13 species were not consistent with other significant local or regional populations?

Given the mosaic distribution of those 13 species within the county and southern California, how does the Report distinguish the Project's on-site populations as being insignificant compared to other off-site populations that may be deemed significant?

There was no data presented that showed any quantitative or qualitative measure of the significance of the on-site population sizes of the 13 species, or their relationship or linkage to nearby off-site populations. The fact of their presence suggests that there is some significance. With the paucity of data presented can we reasonably conclude that 'on-site populations' are not a significant part of a larger regional population?

The edge effect impacts noted by the DEIR (i.e., noise, lighting, invasive plants, grading encroachments, proximal human presence, etc.) to these 13 sensitive species are stated to:

"...be less than significant considering the number of individuals of each species to remain after implementation of the project would be low."

However, since the Report has not quantified:

1. The existing on-site population densities;
 2. The population density thresholds that are deemed significant;
 3. Or, the expected on-site population densities after construction of the Project,
- How can the Report establish that the impacts are "less than significant?"

Are there data that have not been reported?

Should not the Report have presented an objective basis for the threshold of significance?

The Project would directly impact eucalyptus woodland, orchards, and oak woodlands. This would result in the direct loss of functional nesting habitat for raptors. The Project could also indirectly impact nesting raptors that remain on-site or adjacent to the Project through edge effects, such as close human occupation, noise and lighting.

Further, construction operations also have the potential to disrupt nesting and breeding among raptors. Raptors are protected, as a group, by California Fish and

Wildlife codes. The DEIR suggests that this disruption could be mitigated by scheduling construction outside of raptor breeding season, implementing some sort of noise attenuation measures or conducting surveys to impose construction avoidance measures.

Would the applicant, or the County, seriously consider limiting construction to the August to December portion of the year? What are the limits of effectiveness of the hinted at attenuation measures? And, since phase one of the Project surrounds the principle open space and raptor nesting corridor being proposed for the Project, would the applicant actually limit construction near that nesting area? Or, would the applicant mitigate the mitigation by trying to survey the potential impact out of existence?

The DEIR asks the reader to “Refer to Table 1-3, Project Design Considerations, in subchapter 1.2.2 for more details” about preconstruction nesting raptor surveys and complete avoidance measures. The Table of Contents directs the reader to “Table 1-3, Summary of Additional Project Design Considerations, page 1-34,” however, the table is missing from that page and every other page in section 1.2. Is this information available somewhere else? And, if so, where?

Does this missing table information address the effects on nesting raptors from blasting?

Will the blasting component of the grading be timed to avoid nesting periods of raptors?

Blasting activities are likely to have a much more dramatic affect on nesting birds at a much greater distance than the apparently less significant rumbling of bulldozers and earthmovers. Despite a lack of data to inform the public on the decibel contours that raptors find irritating enough to preclude breeding, the DEIR reaches the conclusion that, “raptor nesting impacts would be **less than significant**. This is incongruent with the information presented. How is this done?

The DEIR addresses raptor foraging areas saying,

“Almost all of the on-site habitats are suitable for raptor foraging. The project would directly impact 538.29 acres of the 610.76-acre site [reportedly, it is 608-acres], which is 88% of the raptor foraging habitat on-site. This would result in the direct loss of foraging habitat for raptors. The project could also indirectly impact foraging habitat that remains on-site or adjacent to the project through edge effects...” [underline added]

The DEIR goes on to say that the impact of the Project to the raptor foraging area is more than 5% of that foraging habitat on-site. And yet, this declared significant impact to 538-acres of forage area would be mitigated by phasing the purchase or designation on-site of mitigation acreage based only on the native vegetation lost to the Project [about 81-acres or 15% of the total], not the agricultural lands to be sacrificed to the Project.

As the DEIR says, raptors make significant, and productive use of the orchards, vineyards and row crops present on the Project site for foraging. Why would the applicants not have to mitigate the loss of forage area represented by the agricultural lands on-site as well?

Is the applicant saying that raptors, with 608-acres on which to forage, can 'get by' with a small percentage of the present foraging acreage at a new mitigation site?

Will the edge effects caused by the presence of the Project on-site (i.e., noise, lighting, proximal human presence, dogs, cats, etc.) render any attempted on-site mitigation of foraging area loss within the planned 102-acres of open space less than significant?

The DEIR says such edge effects may compromise on-site mitigation. And if that is true, how will such effects be monitored and mitigated?

And, do these types of edge effects render the planned designated open spaces ineffective for the purposes they are being set aside?

The on-site restoration of wetlands may be seen as possible and acceptable mitigation by the applicant and the county, but since the entire 608-acres has been functioning as raptor foraging area heretofore, the idea that any of the 608-acre Project site could be used to mitigate the loss of that same foraging area is an exercise in double-counting.

Table 1-2 in Chapter one of the DEIR shows the grading quantities by phase to be cut and filled. According to this table, the first two phases will have deficits of fill compared to the amount to be cut in each those phases. Since the applicant claims that the 4-Million cubic yards of earth to be moved on the Project site will not require import or export to or from the site, borrowing from future phases will be necessary. Will the applicant adjust the timing and purchase of mitigation acreage to accommodate the borrowing of fill from future phases that will prematurely impact raptor foraging during the earlier phases?

Will that grading activity in future phases adversely affect raptor nesting in the earlier phases as well as the future phase that is to make up the fill deficit?

Black-tailed jackrabbits were observed on-site. While a 'species of concern', the DEIR suggests that the impact to this species is less than significant, largely because it is judged [without data] to have a less than significant local population. Finding a black-tailed jackrabbit anywhere in northern San Diego County is becoming exceedingly rare. To suggest insignificance for this species, the authors of the DEIR should cite census data showing that the individuals observed on the Project site are not the last remaining members of the species in the north county region. It is possible that the population on the Project site is the last within the region.

It is noted that the Project will be pumping ground water from existing wells on-site. Since the open space riparian woodlands that run nearly the length of the Project and transect it at several points are dependent on adequate ground water to support the oaks, willows and other riparian species, how will the applicant manage the long term ground water levels in the open spaces?

The applicant is proposing to hand off those riparian open spaces to another agency of some sort [still unnamed]. Will that eventual agency share responsibility and authority over the wells that will have a direct impact on the ground water availability for the riparian habitats?

In the event of a drought, will the managing agency be able to restrict ground water pumping for the benefit of the open spaces?

What will be the mechanism of implementing such a restriction?

Will the managing agency have priority on ground water for irrigation to benefit the created and restored wetlands being offered as mitigation for the destruction of other wetland areas after the five-year establishment period?

2.5.2.2 – Issue 2: Riparian Habitat or Sensitive Natural Community [M-Bio-2]

The DEIR's analysis of the impacts to riparian habitat or sensitive natural communities concludes that there will be significant impact and recommends that a Resource Management Plan [RMP] be prepared before the issuance of grading permits.

Are there unknown factors that prevent the RMP from being prepared for release along with the DEIR and related documents beyond a conceptual treatment? So much of what is presented in the Specific Plan for this Project is conceptual or a possible, but undeclared, choice among several alternatives that it is difficult to consider a conceptual RMP as anything more than a suggestion.

The wetland restoration and development areas [= open spaces] are biologically surveyed and mapped. Why is the plan not already developed?

The applicant has a penchant for putting off the preparation of necessary plans until some time after the Project is approved and out of the reach of the public and the entitlements are awarded. This is like buying a pig in a poke.

The DEIR is to relate meaningful, specific information in a way that the public can understand and to which it can respond. Delaying the development of the RMP until after Project approval hides the resolution of a significant impact from the public until there is much less, if any, chance of commenting meaningfully.

Further, the DEIR is not clear on what entity will own and manage the proposed open space easements on which important habitat creation or restoration will take place, suggesting the possibility of a private conservancy, the County, or some other experienced entity. Which is it?

How will these easements be financed into the future? The DEIR is indefinite about endowments or Community Facility District formation or some other finance mechanism.

How will the applicant ensure the financial stability of the open space easements in perpetuity without burdening County taxpayers?

2.5.5.2 Jurisdictional Waters and Waterways [M-BIO-3 and M-BIO-4]

The DEIR identifies significant impacts to jurisdictional waters caused by the Project and proposes to mitigate that loss with restoration of degraded wetlands and creation of new wetlands adjacent to the existing wetlands on-site in open space areas.

The arcane formula that establishes how each jurisdiction determines how sacrificed wetlands will be mitigated and to what extent, apparently results in a straw drawing contest, and the agency that presents the longest straw sets the required acreage for mitigation, they are not additive.

The re-vegetation plan presented as M-BIO-4 is not clear regarding its success criteria. That plan requires 80% transplant/container plant survival in year 1. Is the allowance of 20% plant failure in year 1 made up in year 2 with replanting?

Is the required native plant cover percentage in year 2 based on percentage of total plant cover, including non-native species? Or, is it a requirement that 50% of the total surface area must be covered with native species?

Similarly, is the 50% diversity requirement in year 2, diversity of native species versus non-native species? Perhaps a better question is how does one arrive at a percentage of diversity?

And, what is the meaning of the density percentage compared to the cover percentage?

What is the proposed methodology for determining these parameters? Quadrats? Transects? Estimation? The Biological Resources Report is uncertain which would be employed.

Shouldn't this plan be presented in a more complete and understandable form?

The Report acknowledges that the open space areas within the Project would be largely confined to the drainage courses that the Project will avoid [Biological Resources Report 3.2.8, p. 81]. The Report describes the open space areas as "...narrow and mostly surrounded by development except along the western and southern boundary of the project." The Report also suggests that significant edge effect impacts on the proposed open space areas of the Project would result from increased human access, potential increases in predation/competition on native wildlife from domestic animals, potential increases in invasive plant species or other domestic pests, alterations to natural drainage patterns, potential noise effects and potential effects on wildlife species due to increases in night time lighting. These significant impacts would most affect sensitive riparian birds, but, the DEIR says,

"...habitat quality, functions and values would likely decrease also."

So, shouldn't the Report and DEIR also conclude that species other than birds [rodents, reptiles, amphibians, etc.] would suffer from the degraded habitat quality and propose mitigations directed at those other species?

Surprisingly, the Report asserts, that these significant edge effects can be mitigated by a 50-foot buffer around the preserved wetlands in the on-site biological open spaces. A 50-foot buffer poses little challenge to domestic animals, children or adults, night lighting, invasive plant species or other domestic pests. Adding fencing and signage is only marginally helpful. How will the applicant ensure the integrity of the preserved wetlands and open space in the face of these significant impacts?

How will the mitigation of these impacts be monitored and adequately enforced?

Why is there no definitive plan described in the DEIR or the Report that addresses how these preserved wetlands will be secure from the reported threats?

What was the basis for dismissing the significant impacts by simply adopting a 50-foot buffer?

There will be trails within the limited building zone [LBZ]. How will the LBZ address the edge effects cited?

2.5.5.3 Wildlife Movement and Nursery Sites

The DEIR says that the impacts to wildlife movement and wildlife nursery sites would be less than significant and no mitigation is required. However, riparian woodland and wetland corridors are the conduits for movement of many animal species. The principal drainage for the Project and its surrounding area runs along the western edge of the Project site with multiple tributary drainages running through the Project in southwesterly directions toward the principal drainage. This drainage system, and its associated wetlands and riparian woodlands, offers transit corridors for the animals inhabiting the Project site as well as neighboring properties.

However, the Project is proposing culvert pipes under the roads that transect the wetland corridors that will range from 18-inches to 54-inches in diameter. Six of the seven wetland crossings are proposed to have culverts of 18- to 30-inches diameter. These culverts are too small to allow effective transit by wildlife and will impose barriers to movement. To be effective transit elements under the roads crossing the wetlands and to encourage wildlife to avoid crossing the surface of the roads, such culverts should be a minimum of 54-inches to accommodate larger mammals. What is the basis for proposing smaller pipes? Bridging should be considered for several of the crossings.

While these corridors have not been 'designated' in the draft MSCP/PAMA plans for the County, they perform the same function in the area of the Project site as the corridors delineated in the MSCP/PAMA plan, only on a more local, or secondary scale. To say that their destruction is less than significant must depend on whether the on-site and nearby off-site populations can be quantified as significant or not. That has not been done. The significance of these on-site corridors remains to be determined.

However, given the scope of the Project, likely any local value of these drainage wetlands as transit corridors will be compromised by the edge effects caused by the Project and the direct impacts caused by road crossings within the Project. What objective assessment has been done to determine the significance of these impacts, if any?

As for nursery sites, of the 13 Group 1 species observed on-site, 6 are reptiles or mammals. The seven bird species would likely nest in the riparian woodland or orchard areas. Why is this not significant?

2.5.5.4 Local Policies, Ordinances, Adopted Plans

The DEIR suggests that the Project would comply with several County, State and Federal policies and laws relating to biological resources. However, the DEIR notes that under the Natural Community Conservation Plan [NCCP] for coastal sage scrub [CSS] vegetation, there is no *de minimis* limit for significance. Yet, there is no data to support the conclusion that the 17-acres of CSS to be removed by the Project is insignificant, even in the face of the California Department of Fish and Wildlife's estimate that in the five county southern California region covered by NCCP, approximately 85 to 90 percent of the historically occurring CSS has been extirpated. The DEIR seems overly casual about designating this 17-acres of CSS as insignificant. And, interestingly, the NCCP plan for San Diego County will be manifested in the still draft MSCP/PAMA.

So, what are the ramifications for mitigation if the draft MSCP/PAMA is not approved?

Will there be a significance threshold established in the MSCP/PAMA for CSS if it is approved?

Doesn't the nibbling away of CSS, even when in small stands, inexorably work against the principles of the NCCP CSS program?

At what acreage does a stand of CSS become significant without a delineated animal species observed on-site?

Cumulative Effects

The Report and DEIR pay little attention to the cumulative effects of the Project on regional biological resources. The Report and DEIR focus on effects within the boundaries of the Project with little acknowledgement of the ramifications of this Project on the County as a whole or the Valley Center Planning Area. The Report cites 8 projects that were compared and evaluated against the proposed Project. The review asserts that the majority of the impacts generated by this collection of historic, current and planned projects were to agricultural lands, with little to no impacts to native upland or riparian habitats.

Of course, the Report makes that statement with some satisfaction, apparently not realizing that the loss of agricultural land is contrary to one of the County's General Plan Guiding Principles, as well. Further, all eight of the referenced properties in Table 7 [p.84] are much smaller than the proposed Project, the largest being 44.2-acres and the smallest 5-acres. All are within a few miles of the proposed Project and all are planning parcels larger than 2-acres, some as large as 4-acres in compliance with the present county General Plan and the Valley Center Community Plan. The proposed

Project does not comply with the county's General Plan or the Valley Center Community Plan in this regard.

The comparison doesn't seem an apt one for analyzing regional cumulative effects. If we take San Diego County as the 'region' or even North San Diego County as the region, we should be looking at the historic extent of coastal sage scrub, southern mixed chaparral, southern coast live oak riparian woodland, coast live oak woodland, southern willow scrub, southern willow riparian woodland, and wetlands within that area compared to what exists today. We should then ask to what extent have these vegetation communities been extirpated and to what extent the remaining examples of those communities have significance. Comparing proposed destruction in one project with destruction that has or will result in a handful of other smaller projects isn't an effective measurement of cumulative effects. Will the county examine meaningful cumulative effects within the entire county or, at least, within the northern part of the county?

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Cultural Resource Report and Addendum: DEIR Lilac Hills Ranch

1. The Technical Report (TR) and DEIR address the cultural features individually. In very important ways, it seems to fail to view the Project area overall. DEIR Section **2.6.3 Cumulative Impact Analysis** states:

“the confluences of drainages are often major habitation site locations” and that “the San Luis Rey river valley comprised a major travel corridor and its confluence with Horse Ranch Creek was a focus of prehistoric habitation.” It further states “that Tom-Kav (CA-SDI-682; the Pankey Site) is documented in that area.” The DEIR goes on to say that *“a similar situation is found at the confluence of Moosa Canyon and the South Fork of Moosa Canyon, near Gopher Canyon. CA-SDI-5072 and associated sites have been suggested as the Luiseño village of Moosa.”*

The documented presence of artifacts and sites seem to support the richness of the Project site and surrounding areas. The proposed mitigations and preservation procedures appear to be piecemeal for a project as large and transformative as LHR.

If approved with a determination of less than significant impact, would not the Project cause the loss of individual sites with their information, as well as the basic integrity of the cultural significance of the larger area, and squander the opportunity for future generations to study and appreciate it?

How does the Project plan to determine if such a large center of civilization existed in the Lilac Hills Ranch (LHR) project area?

How will the Project address further necessary consultation given the size (as well as location) of this Project?

How will piecemeal mitigations and procedures be avoided to assure accurate and complete overall evaluation of the Project?

2. The following is stated in the DEIR (**2.6.5.1 Archaeological Resources M-CR-1**):

“In the event that previously unidentified potentially significant cultural resources are discovered, the archaeological monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery to allow evaluation of potentially significant cultural resources.”

What measures will be used to determine the monitor’s credentials and objectivity?

Will leading and properly trained tribal members from all local bands of Luiseno native Americans be consulted: 1) to determine who the monitor will be; and 2) when a potential finding is recognized?

How might this broad consultation mechanism be put into place?

These concerns seem particularly relevant in light of the fact that the TR states that this is an area which has the potential for rich archeological findings and that many diverse tribes could have inhabited this and surrounding areas, many with different types of settlements, yet to be discovered.

3. **2.6.5.1 Archaeological Resources M-CR-1:**

Prior to approval of a Final Map, the applicant shall implement the data recovery program prepared by Mary Robbins-Wade (Affinis 2013) for site CASDI-20436. The data recovery program shall be implemented prior to the commencement of any grading and/or improvements. All data recovery shall include a Luiseño Native American monitor.

Who will the monitor be and will that monitor be acceptable to at least a majority of the tribes involved and affected?

4. Under **2.6.1.3 Methods** (DEIR), Appendix H-1.

Walking parallel transects spaced 10 meters to 15 meters apart appears to be inadequate under the circumstances. What is the justification for such a 'wide net'?

If review of the justification by the local tribes shows the methodology to be inadequate, describe and submit a more rigorous search methodology.

5. Under **2.6.1.4 Records Search Results:**

CA-SDI-4808 was originally recorded during the archaeological survey for the proposed I-15. It was described as a "small milling site, which may be considered a branch of CASDI-4807. CA-SDI-4808 was tested in 1978 to determine site boundaries and evaluate significance. The report concluded that the assemblage appears to be much too limited to make a case for any type of site, which would be distinct from the two villages during San Luis Rey II times. The previous survey concluded that no hypothesis can be made at this time regarding its function during a possible earlier occupation."

The 1978 study is quite old and likely limited. What is the justification for not requiring a more contemporary study that is properly and thoroughly conducted?

If review of the justification by the local tribes shows the study to be inadequate, describe and submit a more rigorous research approach.

A separate village site from those already known and from a different era could be a significant finding. New light would potentially be shed from an up-to-date study.

6. **2.6.1.4 Records Search Results**

The TR and DEIR propose to use studies that are nearly 35 years old. Should they be re-examined by today's standards and in the light of additional information?

In addition, local tribes have advanced significantly in American society in terms of: finance, poverty/wealth and education. Many more Native Americans have been schooled in archeology in particular. A more contemporary study, properly and thoroughly conducted would likely yield significantly different results. A prime example of the benefits of a more current study would be to shed some light upon the potential separate village site, apart from those already known.

Isn't it likely that the involvement of more tribes with members who have more sophisticated archeological skills could shed new light upon the current cultural resource picture?

7. 2.6.1.5 Summary of Survey and Testing Results

“Eight houses within the project site are potentially over 45 years old based on maps and aerial photographs.”

Could this area be considered an historic district because of the sheer amount of properties over 49 years old?

How have these types of settlements been treated regarding archeological significance in other circumstances: regionally, in California and in other parts of the United States?

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2.7 Hazardous Materials and Wild Fires – Comments

2.7.1.1 Regulatory Setting

Among other federal and state regulations, the County of San Diego's General Plan Safety Element sets goals for safety, particularly as they relate to land uses, planning, hazardous materials, and human safety. Goal S-11 reads:

Controlled Hazardous Material Exposure. Limit human and environmental exposure to hazardous materials that pose a threat to human lives or environmental resources.

Among the policies intended to achieve that goal is Policy S-11.5:

Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.

Given the density of the proposed Lilac Hills Ranch development [the Project] [from 2.9 to 20+ dwelling units per acre on 608-acres], and given the intimacy of the proposed Project with the existing productive agricultural operations on the thousands of acres that surround it, why is there no discussion in this section of the DEIR of the buffering requirements needed to separate prospective residents of the Project from the on-going spraying of fumigants, pesticides, and fertilizers on agricultural lands that border the Project?

Human safety, in these particular circumstances, would seem to warrant a discussion of buffers to existing agricultural operations. Why is the buffering plan not presented in connection with hazardous materials?

The present plan appears to ignore buffering of neighboring agricultural operations completely. This Project is replete with sensitive receptors such as schools, parks, homes, a church and a senior assisted living facility. Does the applicant anticipate that the County will impose buffer areas on the surrounding agricultural operations after approval of the Project?

Have the surrounding agricultural operations been notified that their operations may be significantly impacted if buffering is imposed on them rather than the applicant?

Policy S-11.5 seems to put the burden of buffering on the applicant, not the existing agricultural operations. Will this be one of the General Plan policies that will be changed to accommodate the Project at the expense of established agriculture?

A reasonable analysis of the buffering requirement would conclude that buffering surrounding agricultural operations from the Project presents a significant impact to existing agriculture. The applicant's "Analysis of Project Impacts and Determination of Significance," [2.7.2] points to how significant this impact is:

The project would result in a significant impact if it would:

1. Hazardous Substance Handling: Create a significant hazard to the public through the use of hazardous substances.

While the applicant's intention was to discuss the applicant's proposed on-site handling of hazardous materials, that discussion should have also included the issue of buffering the application of pesticides, herbicides, fungicides, amendments and fertilizers by existing agricultural operations. More than one operation adjacent to the Project uses helicopters to apply agricultural chemicals to broad swaths of orchards and fields. Overspray could be an issue if not properly buffered. How will the applicant address this CEQA mandatory finding of significance?

2.7.2.1 Hazardous Substance Handling

In the discussion about hazardous materials in connection with the Wastewater Recycling Facility [WRF], the DEIR states:

Based on conformance with the described requirements for hazardous materials, the project would result in less than significant impacts related to use of hazardous substances.

It seems to be saying that if all the rules are followed there is little risk of an accidental release of a hazardous material like chlorine gas. And yet, there was just such a release at the Escondido water treatment facility last year. That facility was operating under the same strict federal, state, and county controls that are being cited here.

This suggests that the risk of such accidents is real and not zero probability, even under strict control. One might conclude that even with Best Management Practices, the risk is real and likely significant. Given that the proposed school site is a mere 686-feet from the WRF and homes only 250-feet away, and down wind most days, isn't the conclusion that the risks from the use of toxic, hazardous chemicals are less than significant, overly optimistic?

Hazards, Hazardous Materials, & Wildfires

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And, if not, what is the calculated probability of such an event using risk analysis techniques?

Also regarding the WRF, in the early phases of the Project before the WRF is constructed, sewage will be trucked to an off-site location for disposal. That same trucking issue will continue after construction is complete and the WRF is operational, in order to dispose of waste solids screened from the influent. What impact would the 2-3 times weekly truckloads of sewage and/or waste solids have on the safety of residents in the Project?

Will there be a plan in place to deal with an accidental sewage or sludge spill?

What impact will those same frequent trips have on the traffic flow to and from the Project?

2.7.3.3. – Emergency Response and Evacuation Plans

The DEIR cites the Operational Area Emergency Plan and the Multi-Jurisdictional Hazard Mitigation Plan as mechanisms or protocols that would mitigate cumulative impacts to emergency response and evacuation plans. The DEIR fails to address those problems from the Valley Center or Bonsall community perspectives. The mobility element roads nearest the Project are West Lilac Road and Circle R Road. Both of those roads were built to serve a rural community with small, rural populations.

In the event of an emergency evacuation, such as occurred in 2003 and 2007, much of the population of Valley Center and Bonsall will be exiting to the Interstate-15 corridor at once, not just the residents of the proposed Project. While the Operational Area and Multi-jurisdictional plans may help to organize first responders and emergency personnel, the congestion on the limited number of mobility element roads will be intense and long lasting and will affect both evacuees and emergency personnel, who are generally headed in opposite directions. Such congestion could result in serious harm to thousands of people if a fire or chemical cloud should overtake them while trapped in traffic. Does the evacuation plan account for moving emergency personnel and equipment on the same routes as evacuees?

What steps have been taken in the emergency evacuation plans to mitigate the addition of 5000+ people at the Project site?

The applicant has proposed to further exacerbate that bad situation by asking for 10 road standard modifications that would lower the classification of the mobility element roads in some cases, and lower the design speeds of those roads. With lower design speeds and narrower roadways, this Project will imperil the evacuation of the Valley Center and Bonsall existing residents and

impede the prospective residents of the Project at the same time. Such a large urban Project located in a rural setting with limited mobility options could single-handedly, never mind cumulatively, severely and significantly put hundreds of people at risk in the event of a large scale hazardous event like those experienced in 2003 and 2007. Will the applicant be allowed to modify the mobility element roads and private access roads standards with lower design speeds and narrower roadways?

And, if yes, what impact will those modifications have on emergency evacuations from Bonsall and Valley Center requiring travel from east to west, west to east, north to south, and south to north?

The Project's Evacuation Plan, which amounts to "Ready! Set! Go!", is overly simplistic and fails to address the surrounding communities and the impacts caused by evacuating the entire community of Valley Center, twenty to thirty thousand people, over limited west-east evacuation routes, through a new city of 5000+ residents. Congestion was the rule, not the exception during earlier catastrophic fire events. This evacuation plan is oblivious to the wider requirements for West Lilac Road, Circle R Road, and Old Highway 395 by the Valley Center and Bonsall communities and will put those communities at greater risk than previously experienced.

2.7.3.4. – Wildland Fires

The 1991 Oakland Hills Fire led to the passage of the Bates Bill in 1992. This bill, aimed at reducing wildfire hazards in what is now termed the Wildland-Urban Interface [WUI], is based on fire hazard assessment and zoning. CALFire assesses and maps the potential fire hazard severity for the entire state. Besides fuel management and fire-resistant building codes, the Bates Bill also addresses zoning laws that apply to various aspects of land use including *preventive land use planning*. That is, evaluating the fire hazards at development sites and determining whether or not they are smart locations. The DEIR reports that,

"Portions of the project site are within a very high FHSZ [Fire Hazard Severity Zone], and the remainder of the project site is within a moderate FHSZ (CALFIRE 2009)."

The location of urban densities adjacent to a 'very high FHSZ' does not present itself as a smart location consistent with preventive land use planning. The present General Plan incorporates land use and zoning designations that concentrate high-density housing at the core of the Valley Center and Bonsall communities. Such high densities were not planned for the margins of the two communities. Those areas were intentionally planned for large acreages to accommodate agricultural pursuits according to the Community Development Model. If approved, this Project will defeat the intent of the Community

Development Model by locating a dense urban development away from the village cores of Bonsall and Valley Center in an area prone to very high wildfire hazards.

Why hasn't the applicant overlain the Fire Hazard Severity Zones on a Project map to indicate the locations of the very high FHSZ?

Such a map would allow a more informed evaluation of the probable risks to the Project and surrounding properties and how those risks should be handled. Such information is crucial to decision-makers.

The DEIR states there would be "a significant impact (Impact HZ-1)" for failure to meet the standard 100-foot Fuel Modification Zone [FMZ] for significant portions of the project. From the figure showing the FMZ [figure 1-6], it is apparent that about half of the perimeter of the Project would have a substandard FMZ. This is a significant design flaw. Isn't it?

Why hasn't the applicant reconfigured the Project to implement the standard 100-ft FMZ throughout the Project and correctly address the hazards of the WUI?

The mitigation proposed is to acquire an easement on adjacent property that is not a part of the Project so the FMZ can be extended to the full 100-feet. Barring that, the applicant proposes to use ignition resistant construction methods and other non-combustible features to purportedly achieve the same level of fire resistance as the 100-foot FMZ. Presuming such construction techniques could work, why wouldn't the applicant employ them, regardless of the deficient FMZ, simply because it's a safer course when building at the wildland-urban interface?

Has the applicant considered the prudent course of modifying the configuration of those portions of the Project with substandard FMZs, especially those areas in a very high FHSZ, to accommodate the standard FMZ?

A Project of this density and design is inappropriate at this location regardless of building standards and fuel modification plans given the proximity to dense on-site and off-site native fuels [the WUI very high FHSZ], the inconsistent use of a standard 100-foot FMZ, the inadequate evacuation routes for over 5000 residents and the uncertainty surrounding how fire protection services will be provided.

There is also contention over the issue of fire apparatus access to the Project. This concerns the uncertain access rights to the Project along Covey Lane, Mountain Ridge Road and, possibly Rodriguez Road. These are all private roads with limited easement rights. Has the applicant secured definitive proof

of rights to use and improve those private roads for this purpose?

The applicant is proposing to gate the accesses to the southern portion of the Project, which include Mountain Ridge Road, Rodriguez Road and Covey Lane. These gates [5 gates] will impact access through the southern portion of the Project for both evacuating residents and fire apparatus. The applicant has offered several alternative mechanisms to make these gates operate for fire personnel, but has not specified which alternative they are going to pursue or under what circumstances of power failure, smoke, and traffic congestion each might work. When will this information be available for review?

Have any of the proposed alternatives been reviewed by the FAHJ for effectiveness in both normal non-emergency conditions and emergency conditions?

2.7.3.5. – Vectors

The DEIR reports,

“Based on the County’s Guidelines for Determining Significance – Vectors (San Diego County 2009b), a significant impact would occur if the project substantially increased human exposure to vectors capable of spreading disease by:

b. Proposing a vector breeding source, including but not limited to, composting or manure management facilities, confined animal facilities, animal boarding/breeding/training operations”

The DEIR goes on to say that the Project would not involve any manure management or manure management facility. And yet, the Wastewater Reclamation Facility [WRF] will have standing water stored in hydro-modification ponds that could facilitate breeding of mosquitoes. Further, the preliminary screening process will remove human manure from the influent sewage and place it into a storage bin that would be removed only two or three times a week.

While the DEIR asserts that the applicant will take measures to reduce the storage bin’s attraction to flies, rodents and other vectors, it doesn’t elaborate on what those measure would be.

Is it too preliminary to ask how the applicant will control vectors among the storage bins at the WRF?

And, what measures would be implemented to control vectors during the transfer of the bins off-site for disposal?

What are the assurances that the measures taken would be effective?

This is particularly interesting considering the proximity of the school site to the WRF [within 686-feet]. These potential impacts are judged less than significant only if all protocols are followed routinely.

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Fire Protection Plan, Evacuation Study, and DEIR Chapter 2.7 Hazards

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 8/7/2013 Draft Letter (Attachment C) DSFPD Letters. In addition, Valley Center Community Planning Group members had a 2 hour meeting with Chief Amestoy as well as telephone conversations with respect to Environmental Impacts of the proposed LHR Project. 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 4th 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 CALFIRE. **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 54th 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.

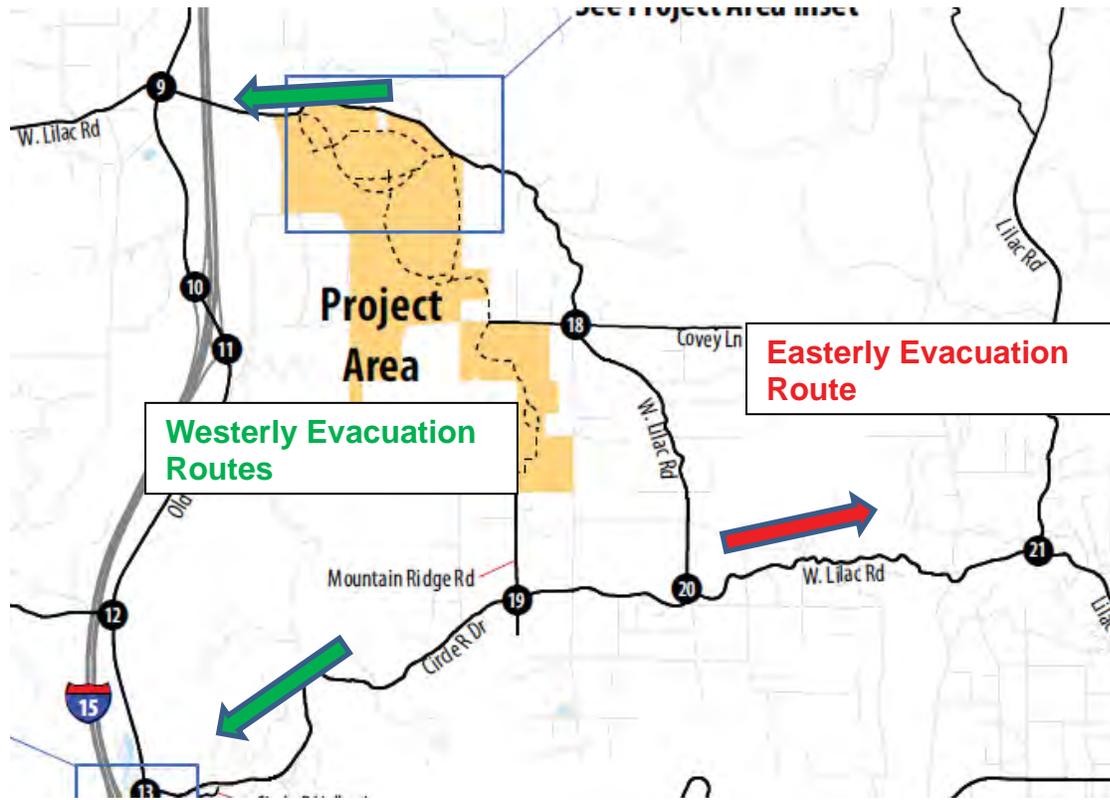
Evacuation Plan - The Evacuation Plan does not address the most fundamental evacuation issue of the Proposed LHR Project – the limited number of roads for automobile evacuation of the 5185 residents of the proposed LHR Project added to the existing area rural and semi-rural population.

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 7, 2013 Draft DSFPD to Slovik Ltr Re: LHR Project DEIR (to be replaced with final when released Aug 12th or later)

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 760-740-6572

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 Llac 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 Hill; 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:

I. 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



Deer Springs Fire Protection District

8709 Circle K Drive • Escondido, CA 92026 • Tel 760-749-8001 • Fax 760-749-6572

DRAFT - TO
BE FINALIZED
FRI AUG 9 @ 17:00 PDT

August 2, 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 SDCTA. 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.

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.

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 5573/B572 Date of Request: Sep. 13, 2012

Project Location: East Side of Interstate 15, southside of W. Leticia Road in the County of San Diego, State of California.

Thos. Bros. Map/Grid: 1049 - 1069 APN: 221-032-40-123-071-01, 123-280-42 123-440-01, 123-030-40

Requestor Name: Aggressive Investments, Inc. Telephone: (858) 548-0700

Address: 12275 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 35 mph design speed over this existing private road (that was previously built to 25 mph standards as conditional to an adjacent subdivision).

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

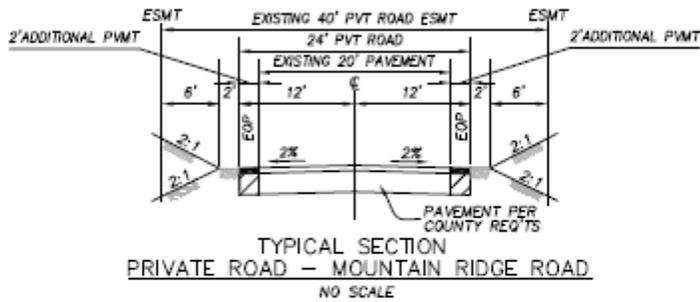
The requested road modification pertains to Mountain Ridge Road (private) north of Circle 9 Drive (see Attachment 1). At a 35 mph design speed, the existing road would have to be completely rebuilt. Existing vertical curves would have to be lengthened considerably (which would result in some existing 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 cross 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):

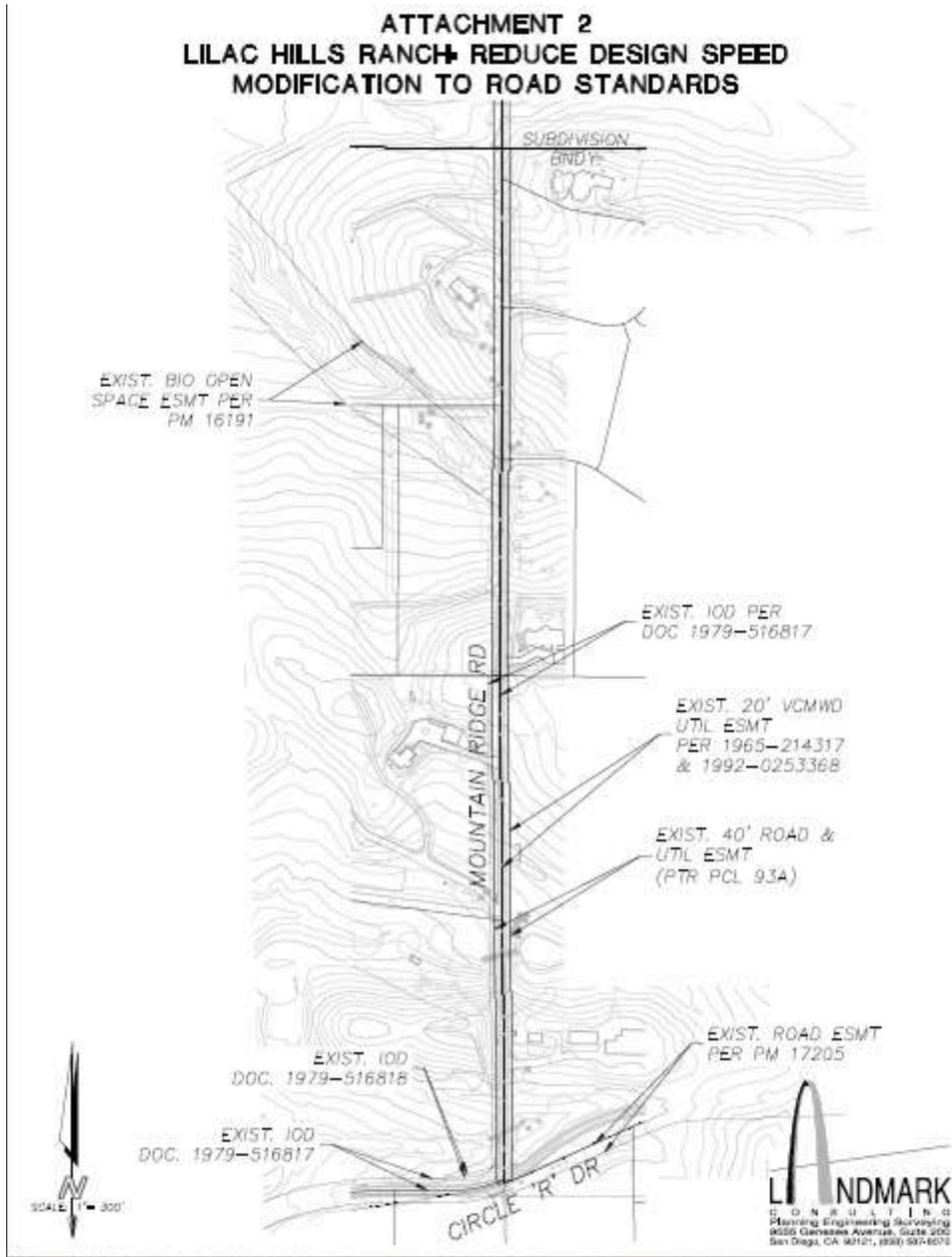
Redesign/reconstruct entire existing road and a retaining walls. Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3, on reverse): The impact to the existing homes on this road would be tremendous and the need for permission to grade letters 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 Rio Open Space easement would be impacted if the 35mph design was constructed. Provide Design and Cost Estimate for meeting the Condition (see note 3, on reverse):

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: 12-0014521 Date of Request: Dec 11, 2012
Project Location: East side of Mountain Rd. southerly of W. Hiller Road in the County of San Diego
State of California San Diego, California City of San Diego
Thos. Bros. Map/Grid: 2048 - 1060 APN: 17-021-44-027-023-01-128-000-00 128-000-01 128-000-02
Requestor Name: Adriana Rodriguez, Inc. Telephone: (619) 449-1711
Address: 13074 El Camino Real, Suite 200, San Diego, CA 92121

Requested Modification (attach engineering sketches showing existing layout, details and notes):
The County public road standard for two lanes between centerlines at intersections is
to be at least a right turn lane at each end to be no less than 10' across or greater
than 10' across. Angle between two 90' (or 100-110') angles will require a taper in the
width lane 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):
The requested road modification is located at the intersection of Mountain Ridge Road
and Circle R Drive, where the existing centerline of Mountain Ridge Road is
90' wide. This would require a taper for right turn from westbound Circle R Road
into 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 unable
to provide and build fold up the access property. Also, the traffic movement from westbound
Circle R Drive to northbound Mountain Ridge Road is very limited.

List alternatives that could mitigate the requested Modification (attach engineering sketches showing proposed layouts, details and notes):
Mountain Ridge Rd to approach Circle R on 90' distance

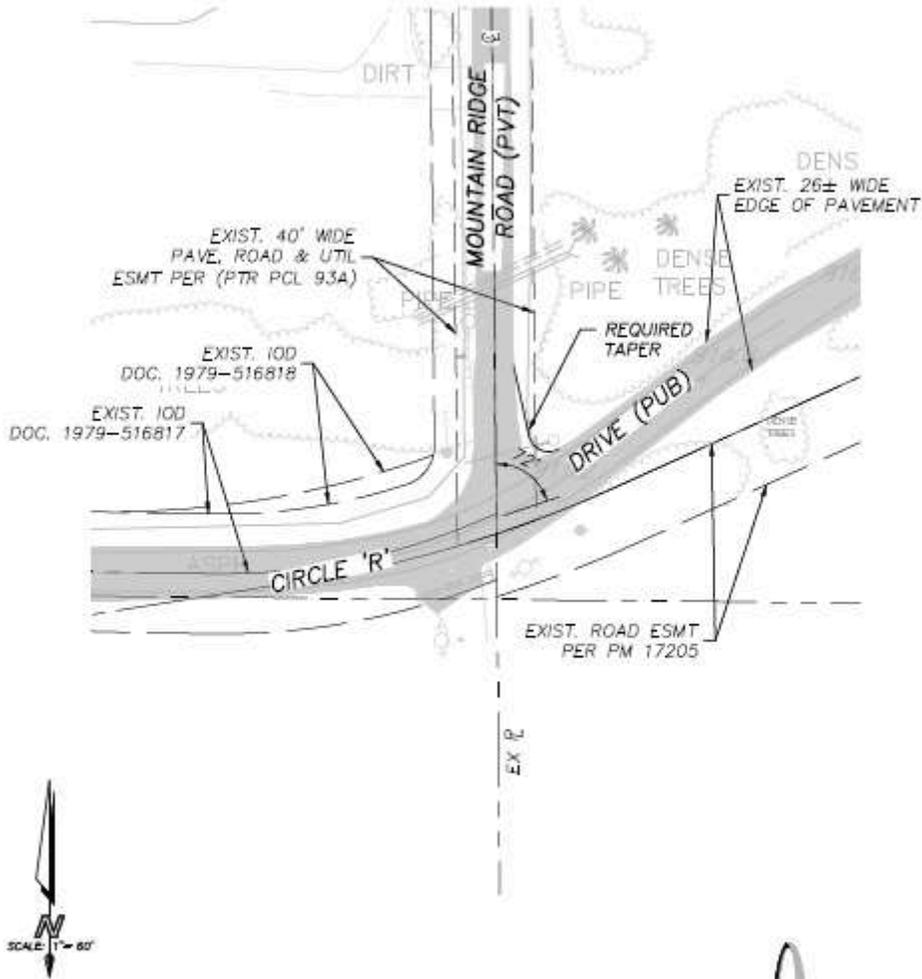
Describe the hardship(s) to the property owner(s) and/or neighbor(s) if the request is not approved (see note 3. on reverse):
A taper cannot be achieved without acquiring an additional road easement from a neighbor
that is against any form of development and easements. There is virtually no utility
government that would protect 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 85th 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



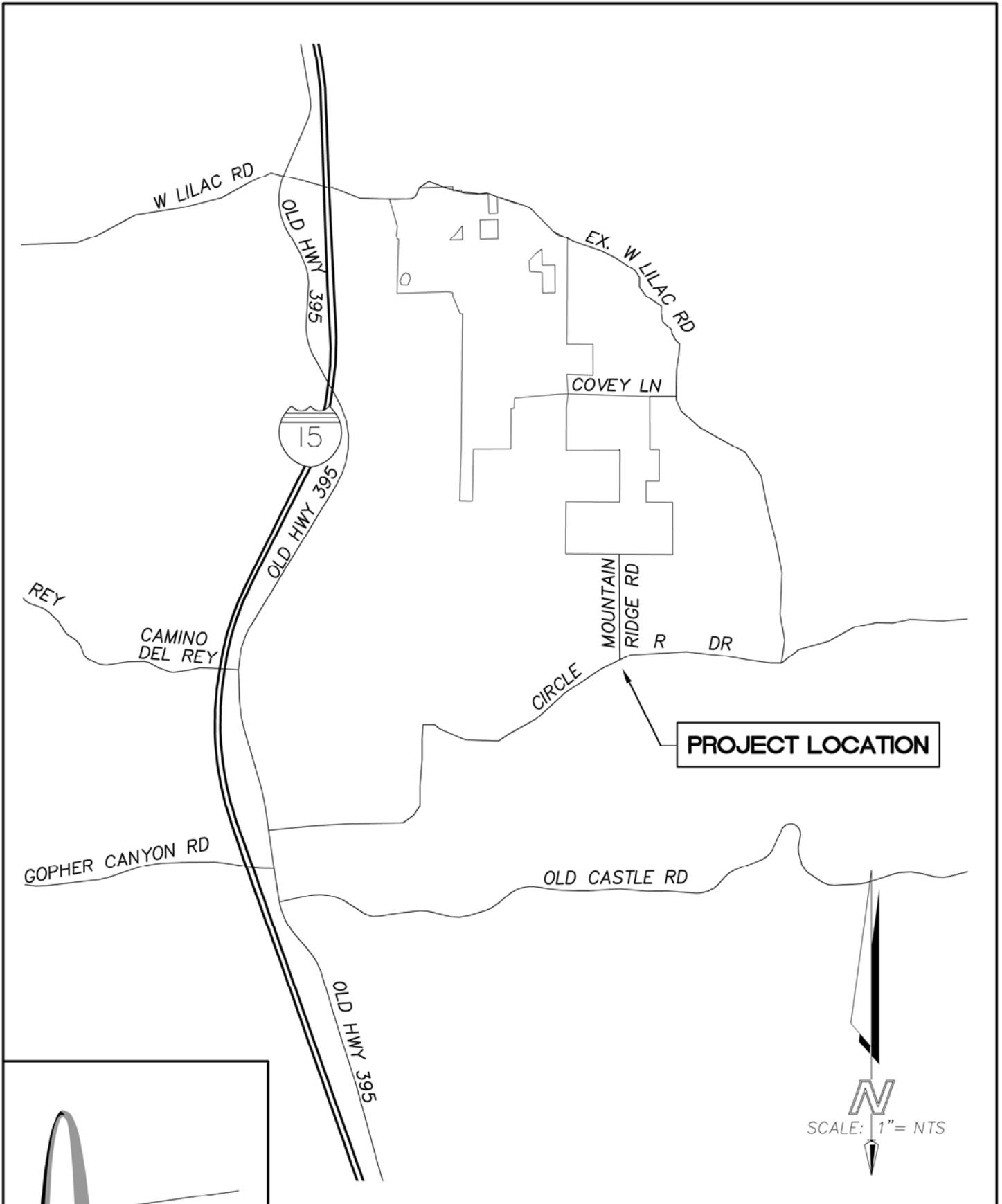


FIGURE 1
VICINITY MAP

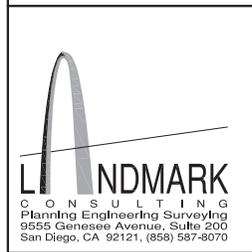
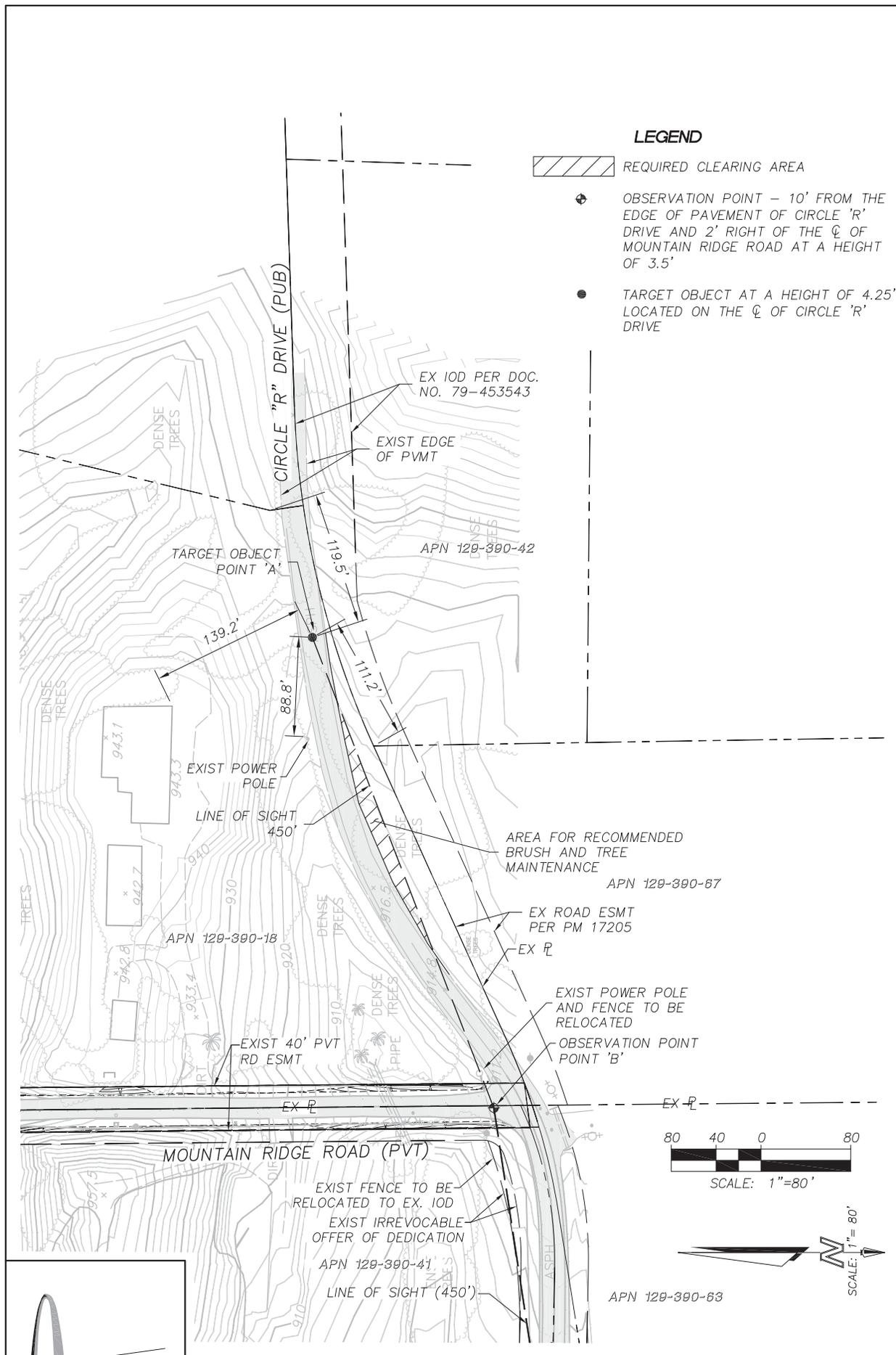


FIGURE 2
SIGHT DISTANCE ANALYSIS
CIRCLE R DRIVE AND MOUNTAIN RIDGE RD

PROFILE: CIRCLE R EAST

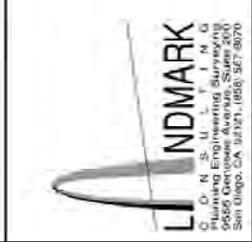
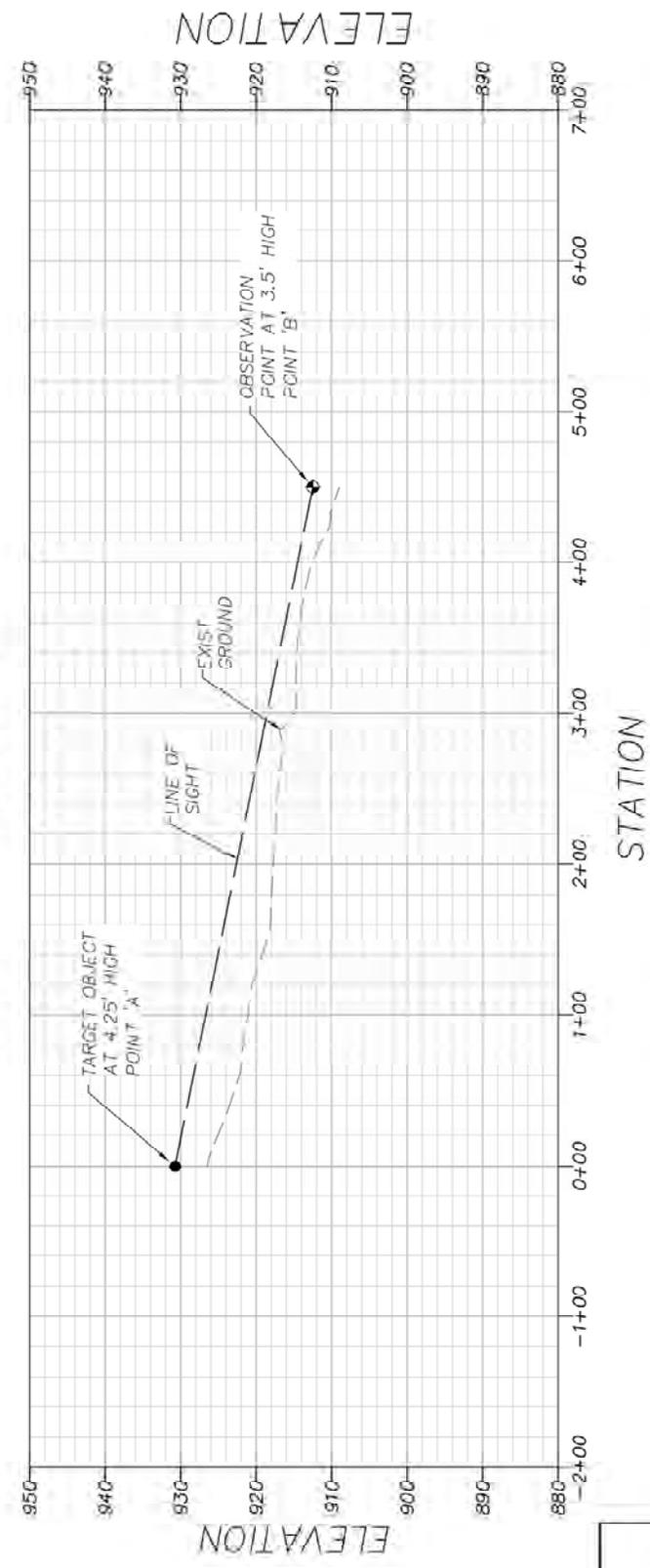


FIGURE 3
LINE OF SIGHT PROFILE FOR MTN RIDGE RD AND CIRCLE R DR (WESTBOUND TRAFFIC)

PROFILE: CIRCLE R WEST

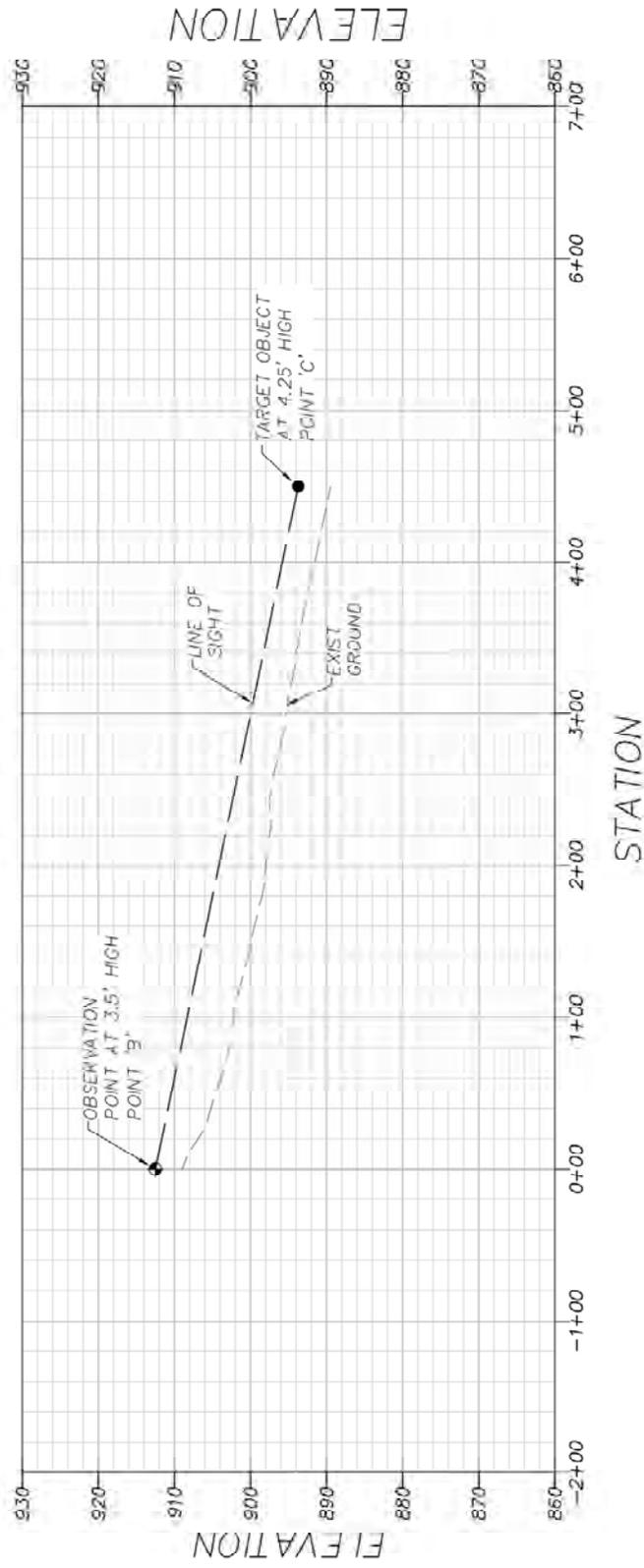


FIGURE 4
LINE OF SIGHT PROFILE FOR MTN RIDGE RD AND CIRCLE R DR (EASTBOUND TRAFFIC)



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 85th 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



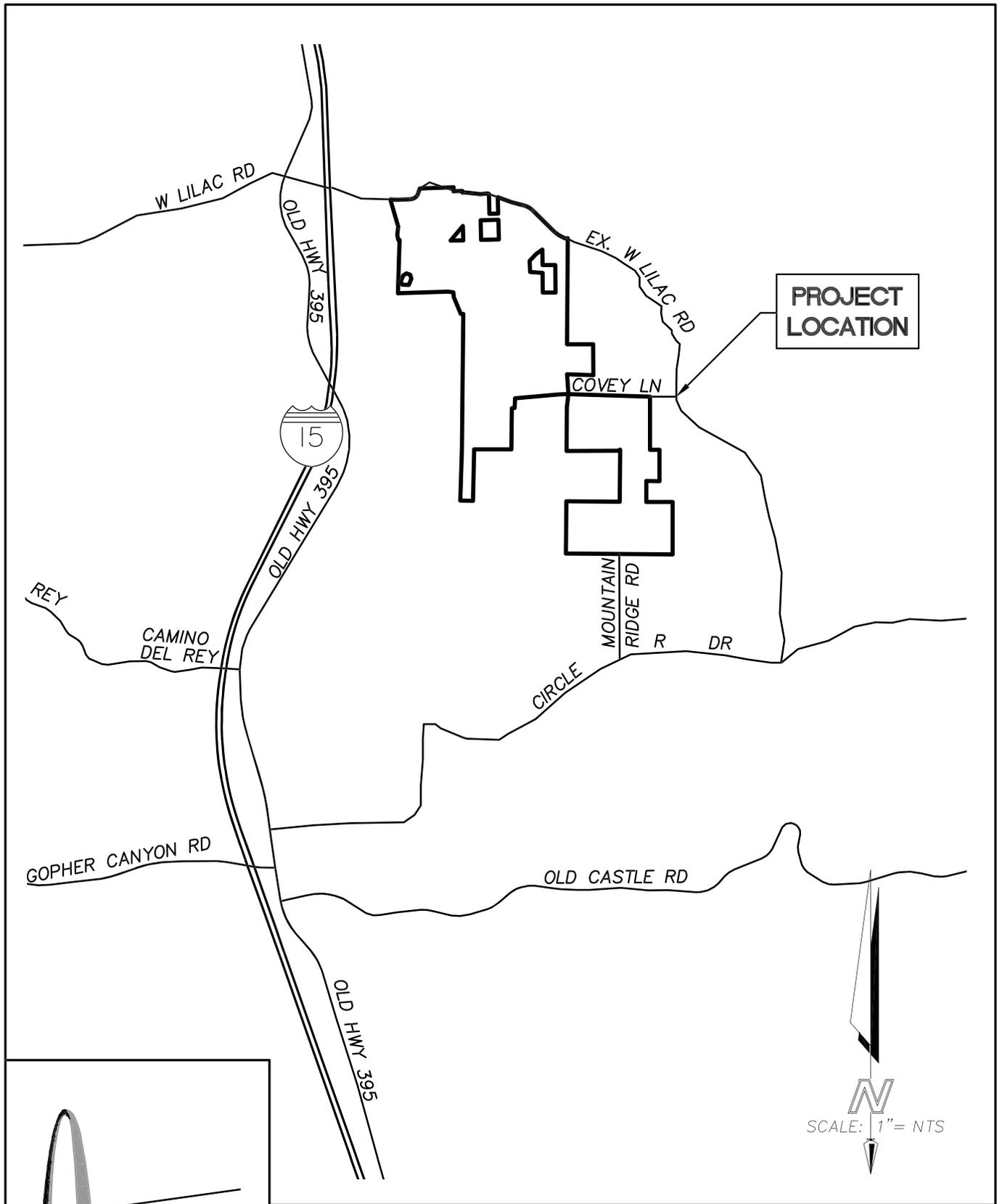


FIGURE 1
VICINITY MAP

PROFILE: W LILAC NORTH

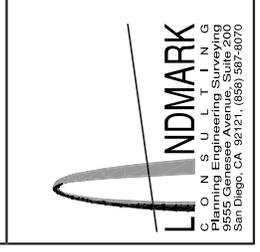
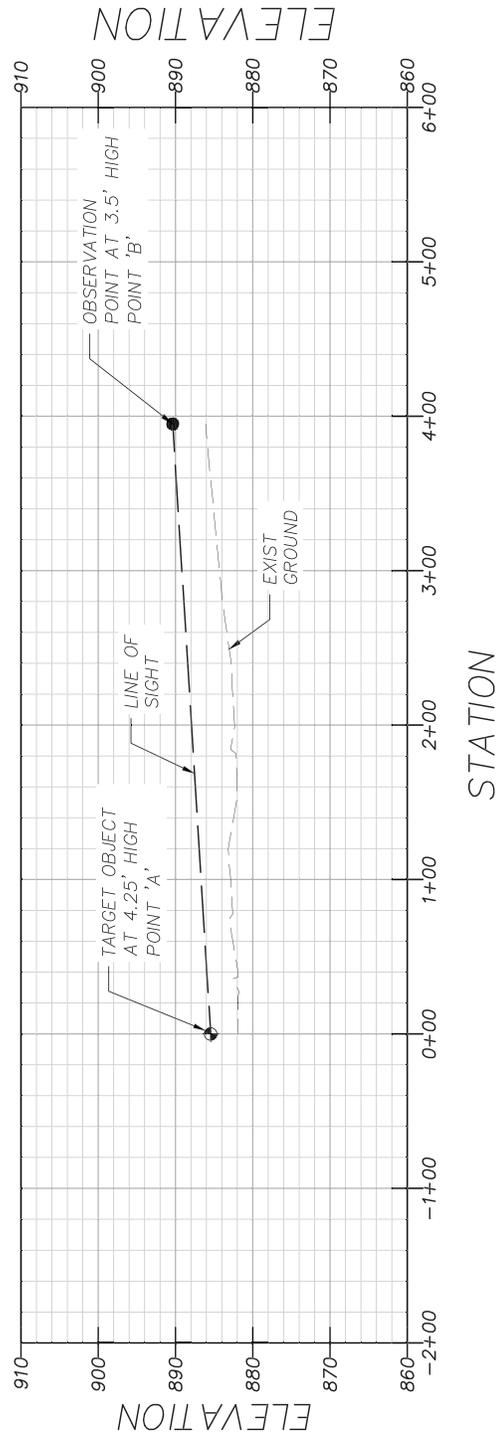


FIGURE 3
 LINE OF SIGHT PROFILE FOR WEST LILAC ROAD AND COVEY LANE (SOUTHBOUND TRAFFIC)

PROFILE: W LILAC SOUTH

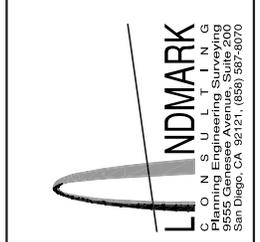
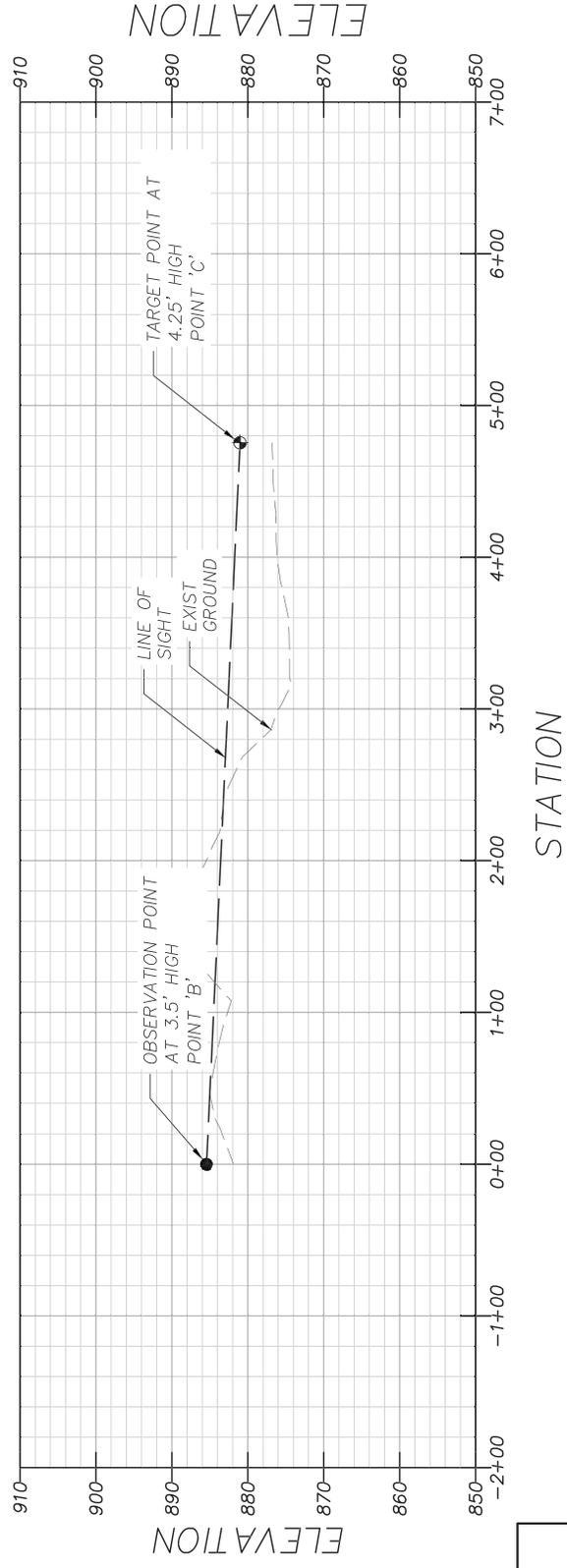
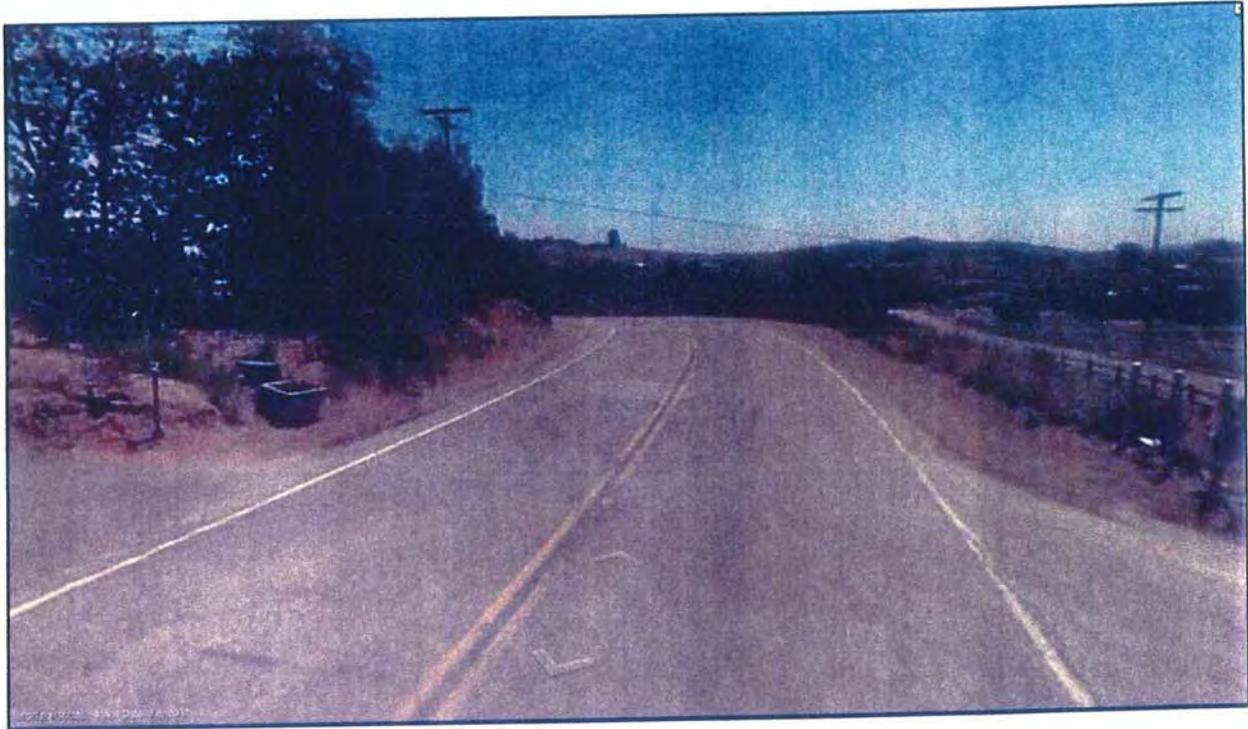
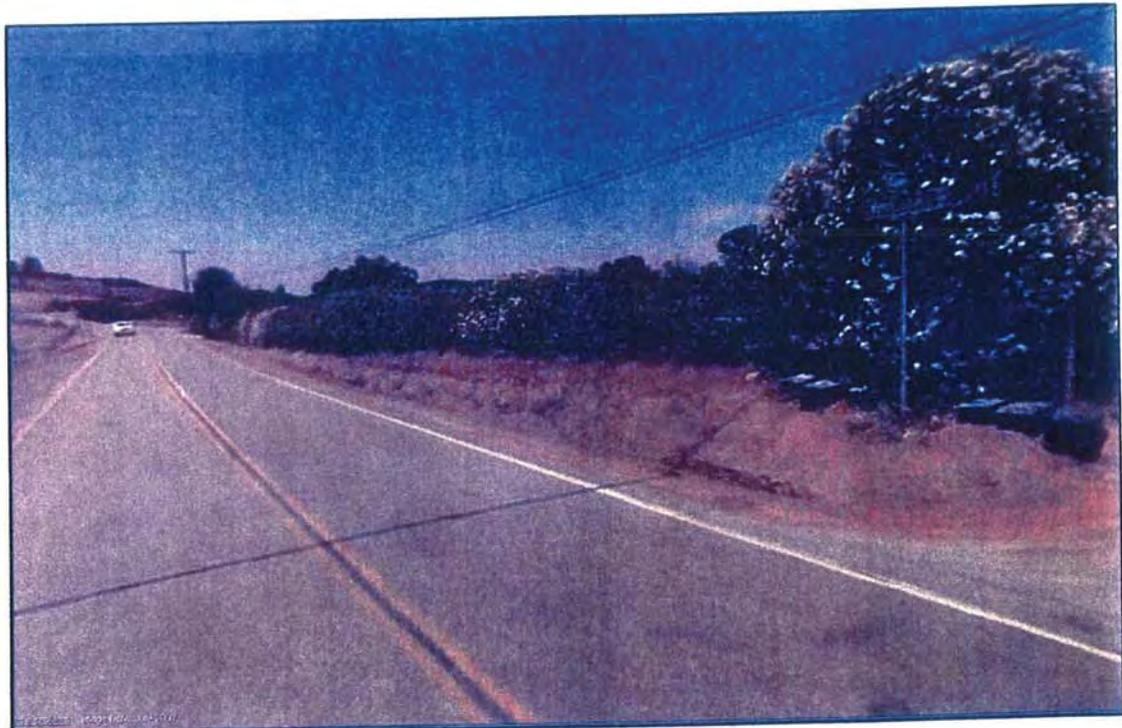


FIGURE 4
 LINE OF SIGHT PROFILE FOR WEST LILAC ROAD AND COVEY LANE (NORTHBOUND TRAFFIC)

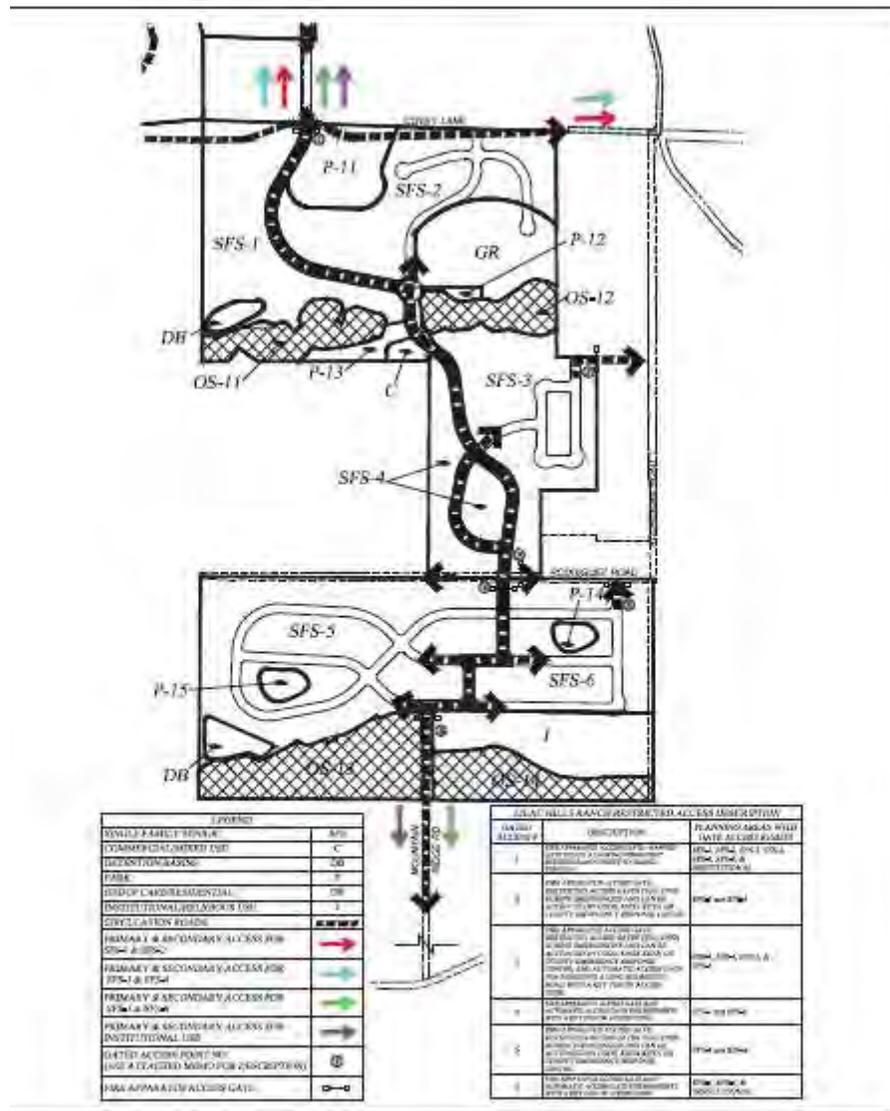


LOOKING SOUTH



LOOKING NORTH

Attachment G - Figure 27-1 Project Gated Access

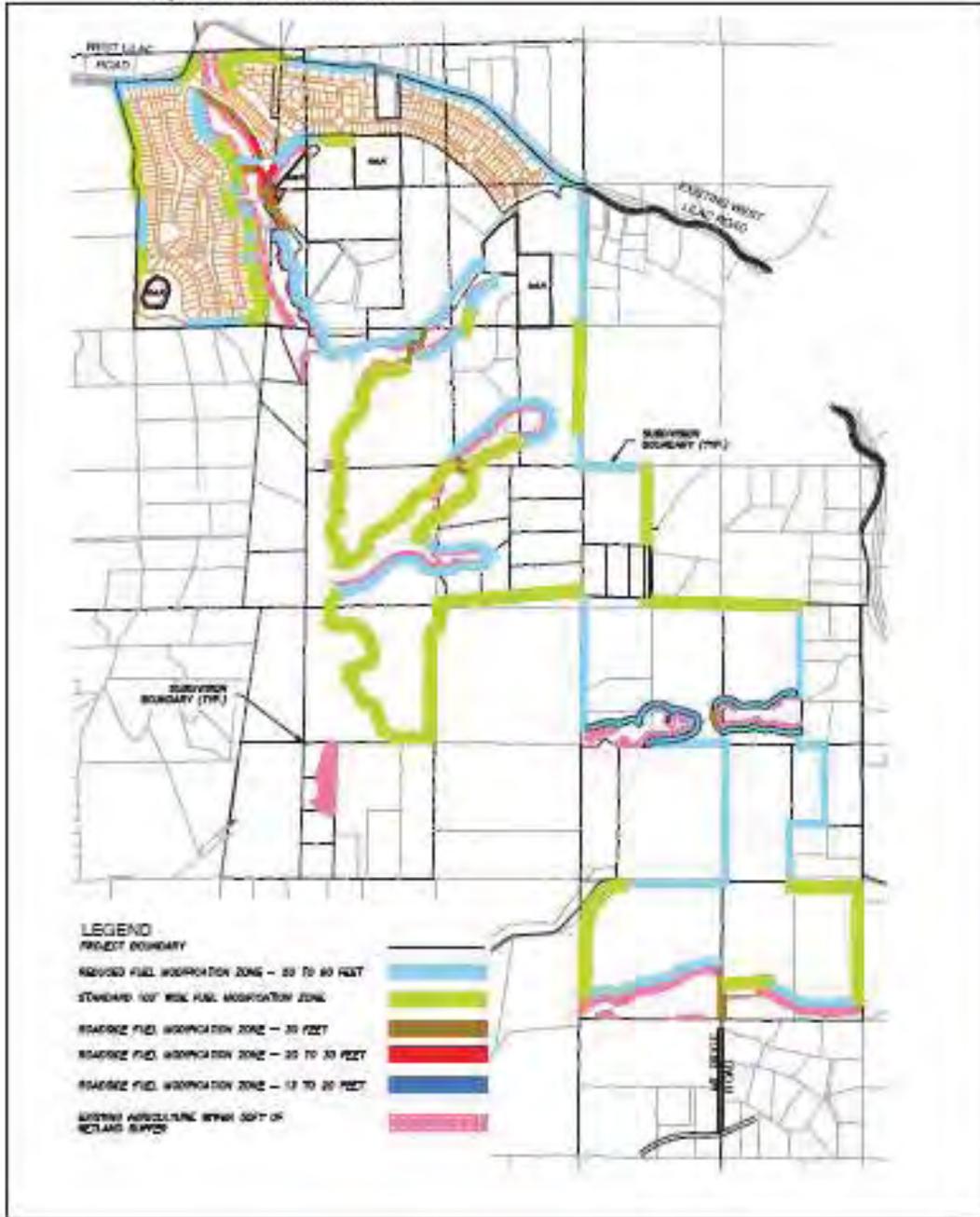


Not to Scale

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

McClintock & Associates, Inc.

REPORT

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)

2.9 Significant Irreversible Environmental Changes Resultant from Project Implementation – Comments

The proposed Project [Lilac Hills Ranch] will, indeed, cause significant, irreversible, and, in most instances, immitigable impacts to the Project site, to the Valley Center and Bonsall communities and their community plans and to the County of San Diego and its General Plan. The Project will require amendments to the General Plan, its principles, policies, and regional land use designations and to the Bonsall and Valley Center Community Plans, or, at least, a severely disfigured interpretation of all of them.

The DEIR focuses on the grading of the Project site, on the use of fuels [energy] to prepare the Project site and manufacture construction materials, on the consumption of construction materials [wood, concrete, asphalt, drywall, etc.], on subsequent energy and natural resource consumption by the eventual residents, and on the amount of time to construct the project. It touches lightly on the loss of biological habitat [504-acres of the 608-acres lost to development].

All of this is true and expected for a Project of such proportions with the exception of the loss of biological habitat, and the severe gouging of the land. Habitat loss and gouging are not always required for such projects. That is one of the reasons why the U.S. Green Building Council's standard for Leadership in Energy and Environmental Design – Neighborhood Development [LEED ND] was created. That standard sets, as a prerequisite among others, appropriate site selection. LEED ND cites as key smart growth strategies the building on previously constructed development sites or 'infill' sites [surrounded or mostly surrounded by previously developed land], and, certainly not on agricultural lands.

Does the County think the Project site comports with the LEED ND prerequisites for site selection and linkage?

Why hasn't the County provided an analysis of the Project's consistency with LEED ND prerequisites for site selection and linkage, or any equivalent standard? Why doesn't the DEIR analyze the Project's consistency with the other LEED ND prerequisites and construction requirements?

Why hasn't the County pressed the applicant to elaborate how the Project meets the LEED ND standard prerequisites for site selection in the case of this Project?

Shouldn't there be an analysis in the Specific Plan to assure the County that LEED ND standards, or their equivalent, are being met?

When a smart growth site is selected, there is no additional loss of biological habitat or excessive land gouging. For this Project, LEED ND was not respected nor observed. Oddly, the County General Plan recognizes the importance of LEED ND criteria and cites them as part of its principles. But, the DEIR and the applicant would subvert them in this case.

Why does the DEIR not analyze the Project in terms of its consistency with LEED ND given that, as a “leapfrog development, it must be certified as consistent with LEED ND requirements or its equivalent” in order to be approved?

Does the County believe that the Project can be certified at any level of LEED ND if built on the presently proposed site?

If the County is using an equivalent standard for certification, what is the equivalent standard?

How does this Project qualify under any other standard if that standard is the equivalent of LEED ND?

The DEIR is correct to cite environmental changes to the Project site based on the 4-million cubic yards of cut and fill proposed for the site. That is nearly 1.5 cubic yards of cut and fill for every single square yard of the Project site. Of course, some square yards will be treated more drastically than others. Some will be blasted to a depth greater than 50-feet. This significant disruption of the natural surface of the land is one of the greatest irreversible changes that will take place, and it is irretrievable once performed.

Does the County truly think that the blasting and movement of 4-million cubic yards of earth is consistent with the local community character? Is mitigation possible?

And, it will take an enormous amount of extra energy and effort to move the 4-million cubic yards of earth around the site to make it conveniently buildable for so many dwelling units and so much commercial space.

Aside from transforming the land surface, moving so much earth and rock to accommodate the development of the Project will also permanently eliminate the Project site as biological habitat for native vegetation, wildlife and agriculture. Comments related to subchapter 2.5, Biological Resources, address the loss of foraging and breeding habitat and the beneficial interaction of wildlife with agricultural lands. State and federal laws address the losses of wildlife habitat.

Again, the General Plan recognizes the importance of natural habitats to the County, but the DEIR suggests that losses of natural habitat can be mitigated by forcing wildlife, that is able, to move to other undeveloped lands in the County and by sacrificing native vegetation with the understanding that the losses caused by this individual Project are not significant.

Of course, the DEIR does not address the cumulative impact of scores of such individual losses caused by multiple projects and the irreversible loss of the majority of such habitat in the aggregation of these individual losses. Viewed incrementally, these individual project losses can be rationalized as minor and insignificant, but viewed collectively over the course of 50-years and on the scale of the entire County, they add up to a very significant majority of natural habitats [the California Department of Fish and Wildlife cites the loss of an estimated 85-90% of the historical extent of coastal sage scrub habitat in the state’s Native Community Conservation Plan (NCCP) – Coastal Sage Scrub]. An acre here, an acre there, it all adds up.

Why does the DEIR not address these cumulative irreversible losses of habitat within the County as a whole, or within the five-county southern California region, and the additive effect of large projects such as this Project?

The DEIR also fails to adequately discuss the loss of agricultural land to this Project. The agricultural operations on and around the Project site are locally significant and typical of the operations that propel agriculture in San Diego County. The County's General Plan provides for the preservation of existing farmland as a key goal and principle. LEED ND standards discourage development on agricultural lands.

The County's land surface is finite. At what point does the loss of 504-acres of farmland in a Project like this one push the County over the edge to a completely urban County?

Beyond the irreversible impacts and losses of land features and biological habitat are losses to the structure of governance. After over 12 years of discussion, revision, and compromise; thousands of hours of citizen volunteer effort; and, the expenditure of nearly \$20 Million in taxpayer funds, the San Diego County General Plan, approved in August 2011, became, in the words of the California Supreme Court, "the constitution for future development." Citizens purchasing property could look to the County's General Plan to apply diligence regarding future land uses surrounding the property they wished to buy and make a judgment on the value and appropriateness of such a purchase. Will the County defend the General Plan from the depredations of Projects like this one?

Moreover, this Project would subvert the intention of the state legislature to have every county adopt "a comprehensive, long term general plan" [Calif. Gov. Code §65300]. For, in order to be approved, this Project would require the County to radically amend its general plan after only two years of existence to accommodate this Project. This Project was conceived as the present General Plan was being finalized and the applicant could have sought inclusion in it. It did not.

Consequently, to be approved, this Project will require the County to substantially revise the General Plan's approved land use designations for the Project's site, and cause the County to strenuously distort the interpretation of the General Plan's goals, principles and policies [or to simply amend them to fit]. These actions will subvert the General Plan and throw the Bonsall and Valley Center Community Plans into disarray. This is not what the legislature had in mind.

Nor should a single commercial applicant be able to overturn the intent and authority of the General Plan to finagle approval for a single project that is inconsistent with that plan.

Similarly, the Bonsall and Valley Center Community Plans, extensions of the San Diego County General Plan, will have to be amended to accommodate this Project. This Project will mangle the hard-won compromises on land use designations for both communities. Both communities were planned using the Community Development Model defined in the General Plan. Both communities adopted land use and zoning plans that gradually diminished densities from their core villages to the limits of their planning areas, consistent with the model. The present Project undermines those plans with no particular benefit to either community.

Further, moving so much ground and building so many structures will irreversibly change the view-scape for owners of surrounding properties as well as others living in or passing through Valley Center and Bonsall. The proposed Project will diametrically convert spreading native vegetation, agricultural fields and orchards into a sprawling urban/suburban view-scape, quite out of place with its surroundings. In the process, it will have a similar urbanizing and growth-inducing effect on the I-15 corridor to the west.

Admittedly, the losses to the structure of governance are ultimately reversible. However, given the long-term expectation for general plans, perversion of the present General Plan by such projects as this one will have effects that may outlast the lifetimes of many of the residents of Valley Center and Bonsall. Given those effects, irreversibility does not seem too much of a stretch.

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)

Lilac Hills Ranch

Geology Report and Supplemental Geology Report

What is the county rationale for not requiring a final Geology Report as part of the DEIR in view of the many undocumented fills still to be investigated referenced in this report?

Excavation Characteristics 5.1.1 describe the need for blasting which cannot be quantified to determine the amount and length of time needed to do removals and ultimately placement of fills. Silicates potentially will be a hazard with regard to AQMD standards.

Slope Stability and Remediation describe cut slopes 6.2.1 and fill (manufactured) slopes 6.2.2 in excess of seventy (70) feet in height. There are no seventy foot high manufactured slopes existing in this community which makes these proposed slopes out of character with the community.

The off-site proposed improvements include but are not limited to the

Widening of West Lilac roads adjacent the Maxwell Bridge 700 feet, Old Highway 395 between Gopher Canyon and Circle "R" and Covey Lane from the intersection of West Lilac all have had minimal review.

The installation of approximately 2570 feet of forced sewer main will require additional investigation and review once easements are established.

Hydromodification Management Plan (HMP)

Detention basins construction prior to, during and post construction need to be clearly described as to how they coordinate with the phasing plan. The grading plans, geology reports and HMP have yet to be subject to plan check oversight and current County grading ordinance. The county grading ordinance limits and restricts the quantity of total area exposed at any one time.

Since County environmental restricts percolation of sewer into disturbed material or placed fills, what is the county rationale for not requiring clarification in the DEIR of how the construction phasing would comply with all county standards.

3.0 Effects Found Not Significant During Initial Study

3.2.24 The project does not introduce a new village but does negatively impact the existing village of rural agricultural residences. Existing infrastructure would be lost and any new infrastructure would change the entire complexion and burden the "Rural Agricultural Economy" that exists. Any new development would restrict accepted practices of farming further increasing the fiscal impact. This is not a fringe of an existing community which becomes very clear when you review all the impact studies which extend to the eastern boundaries of the community.

Specific Plan & Technical Documents

Implementing Grading Plan Sheet 1-9

The plans are preliminary and the general notes lack clarification of detail, i.e.:

Item 13

Removal of all septic systems. County environmental requires the installation of vertical wells into a leach field to replace any loss to existing leach fields if possible. Not all easements have been secured to allow for the removal of all septic systems which will impact design.

Item 14

What is the county rationale for not requiring lighting standards impacting adjacent properties to be consistent with the current use of those properties?

The existing Village of agricultural businesses do not have light standards that are associated with high density bedroom communities.

Item 15

What is the county rationale for allowing a reference to a TM plan that does not yet exist in the DEIR?

exist where easements have not been vacated, quitclaimed or extinguished is too preliminary an exercise to attempt to determine if the plan will work once it is submitted to the governing agency for plan check approval.

Item 16

Regarding the containment of storm water. There

As it is subject to NPDES (National Pollution Discharge Elimination System) and the SWPPP (Storm Water Pollution Protection Plan), what is the county rationale for not

requiring a detailed phasing plan tied directly to the hydromodification management plan?

Implementing Preliminary Grading Plan & Implementing Tentative Map (Phase 1)

These proposed plans reflect a permutation of an existing rural farm "Village" with high density housing which does not exist anywhere in the community.

The plans reflect manufactured slopes from 3' to 70' in height. The county grading ordinance requires landscaped coverage and limits the amount of open grading activity at one time. Q. How will this phasing be accomplished?

Letters of permission to grade and easements are still outstanding. Q.

What is the county's rationale for not requiring the project to provide a clear plan to accommodate outstanding easements if they are not secured?

With restrictive grading standards how will "Blue Line" streams and migratory corridors be maintained?

What is the county's rationale for proceeding with the DEIR review process as the geotechnical reports are still incomplete?

there are no provisions for vernal pools if they are identified. Q. How will they be preserved?

The plans do not identify any cultural interest or features such as "midden area's" or burial sites. Q. When will these issues be addressed?

What is the county's rationale for not requiring the project to provide alternatives proposed on the revised plan since the proposed shallow 4" forced main sewer meanders thru both private and public land?

Q. With regard to the NPDES, RWQCB, AQMD and Fish and Game, when will the SWPPP that typically accompanies the grading plans with plan check submittals be available for review?

Water Quality Standards and Related Requirements

We 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.

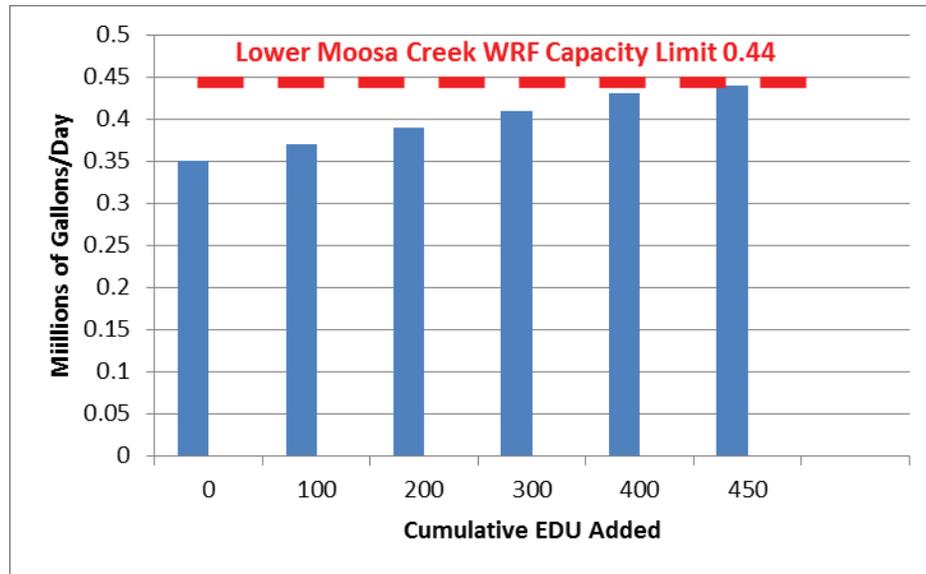
Question 4). Please list all permits required by agency and agency contact information for all permits not currently granted to VCMWD that enable expansion of the LMWRF from 0.5 MGD to 1.0 MGD capacity. It appears in fact that expansion will not occur for a variety of reasons. Please explain.

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:

TABLE 5-1 POTENTIAL ACREAGE TO BENEFIT FROM RECYCLED WATER		
Irrigation Application Rates	Lilac Hills Ranch Acreage (based on 300 AFY)	Additional Acreage (based on 57 AFY)
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 naïve 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.

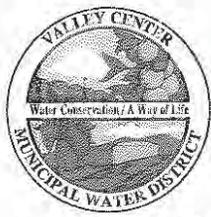
Attachment A – July 8, 2013 VCMWD to Jackson letter

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

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 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;



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

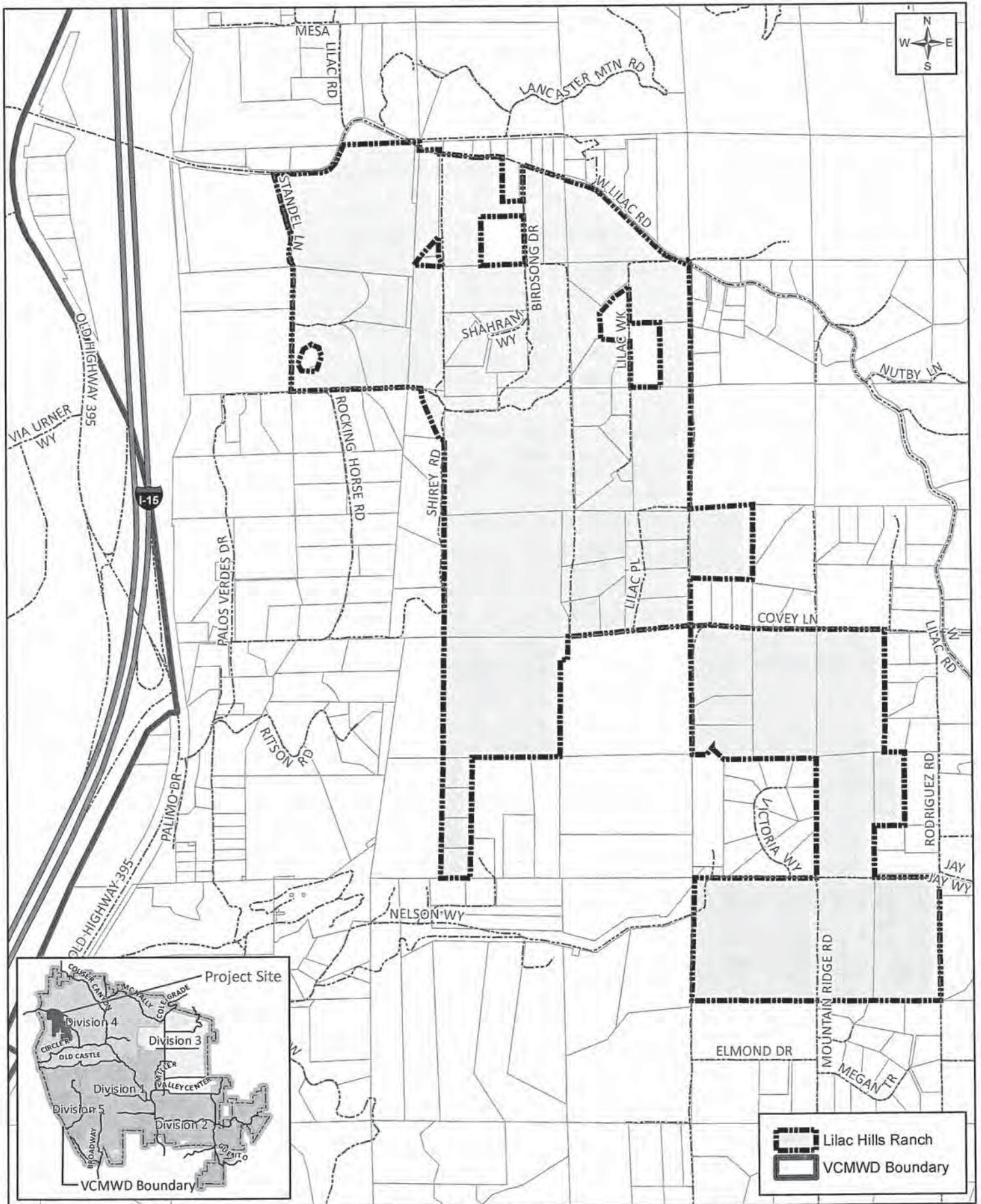


EXHIBIT A Lilac Hills Ranch

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
SUBTOTAL		608	1,746	
Existing Dwelling Units to Remain				
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
SUBTOTAL EXISTING HOMESITES	-	-	16	
TOTAL	-	608	1,762	

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

TABLE 2				
EXISTING PARCELS WITHIN PROJECT PERIMETER				
APN	Owner	Acreage	EDU	Zoning
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
TOTAL	-	17.06	9	-

SR-4 is 1 unit per 4 acres

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

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
GOOD TO EXCELLENT BASE 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
MEDIUM BASE 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
POOR BASE 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	Housing subdivisions of 10 or more dwelling units. Examples: single-family homes, multi-family homes, condominiums, and apartments.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	B	Commercial—greater than one acre. 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	Heavy industry—greater than one acre. 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	Automotive repair shops. 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	Restaurants. 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.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	F	Hillside development greater than 5,000 square feet. 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	Environmentally Sensitive Areas (ESAs). 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	Parking lots 5,000 square feet or more or with 15 or more parking spaces and potentially exposed to urban runoff.
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	I	Street, roads, highways, and freeways. 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	Retail Gasoline Outlets (RGOs) 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 ⁽¹⁾	P ⁽²⁾	P	X
Commercial Development 1 acre or greater	P ⁽¹⁾	P ⁽¹⁾		P ⁽²⁾	X	P ⁽³⁾	X	P ⁽³⁾	P ⁽³⁾
Heavy industry /industrial development	X		X	X	X	X	X		
Automotive Repair Shops			X	X ^(4&5)	X		X		
Restaurants					X	X	X	X	
Hillside Development >5,000 ft ²	N	N			N	N	N		N
Parking Lots	P ⁽¹⁾	P ⁽¹⁾	X		X	P ⁽¹⁾	X		P ⁽¹⁾
Retail Gasoline Outlets			X	X	X	X	X		
Streets, Highways & Freeways	N	P ⁽¹⁾	N	N ⁽⁴⁾	N	P ⁽³⁾	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"/>	A	Housing subdivisions of 10 or more dwelling units. Examples: single-family homes, multi-family homes, condominiums, and apartments.
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	B	Commercial—greater than one acre. 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	Heavy industry—greater than one acre. 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	Automotive repair shops. 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	Restaurants. 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.
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	F	Hillside development greater than 5,000 square feet. 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	Environmentally Sensitive Areas (ESAs). 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 type="checkbox"/>		Parking lots 5,000 square feet or more or with 15 or more parking spaces and potentially exposed to urban runoff.
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	I	Street, roads, highways, and freeways. 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 type="checkbox"/>		Retail Gasoline Outlets (RGOs) 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>
Sub total Added impervious		14.54
Existing impervious		<u>11.60</u>
Total		26.14

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

PDP Categories	General Pollutant Categories								
	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 ⁽¹⁾	P ⁽²⁾	P	X
Commercial Development 1 acre or greater	P ⁽¹⁾	P ⁽¹⁾		P ⁽²⁾	X	P ⁽³⁾	X	P ⁽³⁾	P ⁽³⁾
Heavy industry /industrial development	X		X	X	X	X	X		
Automotive Repair Shops			X	X ⁽⁴⁾	X		X		
Restaurants					X	X	X	X	
Hillside Development >5,000 ft ²	X	X			X	X	X		X
Parking Lots	P ⁽¹⁾	P ⁽¹⁾	X		X	P ⁽¹⁾	X		P ⁽¹⁾
Retail Gasoline Outlets			X	X	X	X	X		
Streets, Highways & Freeways	X	P ⁽¹⁾	X	X ⁽⁴⁾	X	P ⁽³⁾	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.

From: Smith, Oliver
Sent: Wednesday, August 07, 2013 7:03 PM
To: 'bsdsup@gmail.com'
Subject: BSD Review of Lilac Hills Ranch DEIR
Attachments: GPA12001-DEIR-Chap3-070313.pdf

Janice,

I apologize but it appears I never sent you an email as I promised with the Draft EIR for the Lilac Hills Ranch development project in Valley Center information for you to review. I would like Bonsall School District to review the relevant sections of the document relating to Bonsall schools and confirm the accuracy and completeness of the applicant's submission.

Attached DEIR Chapter 3 section 3.1.5 deals with Public Services of which the Bonsall School District is a part. The complete DEIR can be viewed and downloaded from:

http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC_HILLS_RANCH/LILAC-HILLS-RANCH.html

Please feel free to send any comments and concerns directly to the county or to me as the Planning Group would be happy to include them in our response, planned for mid-next month.

Regards,

Oliver Smith
Chair, VCCPG

From: Smith, Oliver
Sent: Tuesday, July 23, 2013 1:11 PM
To: 'tgeiser@dsfd.sdcoxmail.com'
Cc: Margarett Morgan
Subject: RE: DSFD review of Lilac Hills Ranch DEIR
Attachments: Fire_Protection_Plan.pdf

Tim,

I neglected to include the attached Fire Protection Plan that the applicant submitted with the DEIR.

From: Smith, Oliver
Sent: Tuesday, July 23, 2013 9:04 AM
To: 'tgeiser@dsfd.sdcoxmail.com'
Cc: Margarett Morgan
Subject: DSFD review of Lilac Hills Ranch DEIR

Tim,

As we talked about on the phone this morning, the Lilac Hills Ranch project released their Draft EIR earlier this month. In it, they stated that the Deer Springs Fire Protection District was the applicable agency for fire protection services for the project. I would like to have the Deer Springs Fire Protection District review the relevant sections of the Lilac Hills Ranch DEIR relating to fire services and comment on the accuracy and completeness of the applicant's submission.

Attached DEIR Chapter 3 section 3.1.5 deals with Public Services of which the fire district is part. Fire services are also addressed in attached DEIR Chapter 1 section 1.2.1.3. Please feel free to send any comments and concerns directly to the county or the Valley Center Community Planning Group would be happy to include them in our response, planned for mid-next month.

Regards,

Oliver Smith
Chair, VCCPG
(760) 918-7331 (work)
(760) 703-1455 (cell)

From: Jarman, Charles <Charles.Jarman@sdcounty.ca.gov>
Sent: Thursday, August 01, 2013 5:36 PM
To: Smith, Oliver
Cc: Kane, Janice
Subject: RE: Library Review of Lilac Hills Ranch DEIR

Mr. Smith,

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. Thank you for the opportunity to review.

Regards,

Charles Jarman
Facilities Manager
San Diego County Library
858-694-2439
Charles.Jarman@sdcounty.ca.gov

From: Kane, Janice [mailto:Janice.Kane@sdcounty.ca.gov]
Sent: Thursday, July 25, 2013 10:25 AM
To: Smith, Oliver
Subject: RE: Library Review of Lilac Hills Ranch DEIR

Good morning,

The library staff will review the draft EIR for the Lilac Hills Ranch development project and will respond to you by August 2.

Thank you for contacting us with your request.

Janice Kane
Administrative Secretary IV
San Diego County Library
5560 Overland Avenue, Suite 120

San Diego, CA 92123
858-694-3152

From: Smith, Oliver [mailto:oliver.smith@philips.com]
Sent: Wednesday, July 24, 2013 1:55 PM
To: Kane, Janice
Subject: FW: Library Review of Lilac Hills Ranch DEIR

Janice,

As I indicated on the phone this morning, the Draft EIR for the Lilac Hills Ranch development project in Valley Center. was released for review earlier this month. I would like San Diego County Library Department to review the relevant sections of the document relating to libraries and confirm the accuracy and completeness of the applicant's submission.

Attached DEIR Chapter 3 section 3.1.5 deals with Public Services of which libraries are a part. The complete DEIR can be viewed and downloaded from:

http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC_HILLS_RANCH/LILAC-HILLS-RANCH.html

Please feel free to send any comments and concerns directly to the county or to me as the Planning Group would be happy to include them in our response, planned for mid-next month.

Regards,

Oliver Smith
Chair, VCCPG

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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?

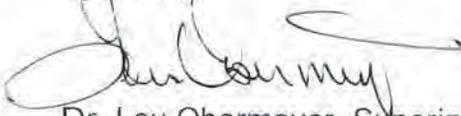
2. Shared approach to proposed K-8 school: On page 3-82, the document describes an offer to 'reserve' a 12 acre site, "for possible acquisition by a school district". On page 1-7 it describes this as, "The two local school districts would have an opportunity to acquire the site based on their independent 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, sweeping flourish extending to the right.

Dr. Lou Obermeyer, Superintendent

Valley Center-Pauma Unified School District

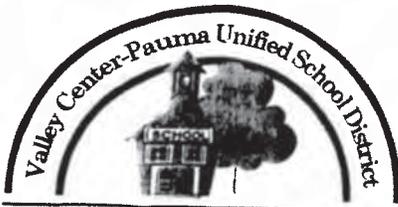
Encl: Letters and email communications mentioned herein.

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



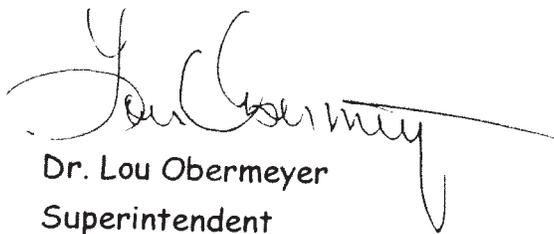
July 20, 2010

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,

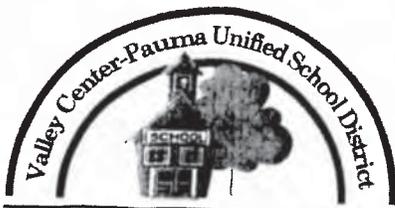

Dr. Lou Obermeyer
Superintendent

Superintendent
Dr. Lou Obermeyer

Board of Trustees
Douglas C. Barbara, MD

Superintendent
Donald J. Martin

Superintendent
Henry P. van Wyk, IV, M



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
T. J. Obermeyer

Board of Trustees
Douglas E. DeBarro, MD

Trustee
Donald E. Martin

Trustee
Henry P. van Nyk, DVM

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.

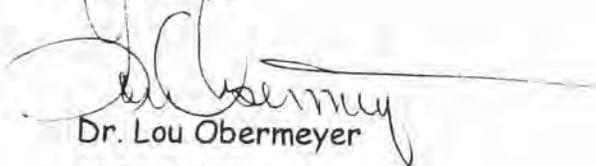
To summarize my concerns, I offer the following information:

- Valley Center-Pauma USD closed an elementary school in 2008. Prior to building another school the elementary school would be re-opened.
- To met 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.

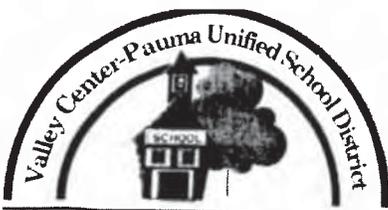
Dr. Lou Obermeyer

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@sdcountry.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

Superintendent
Lou Obermeyer

Board of Trustees
Joseph J. DeLuca, MD

Secretary
Dorinda Martin

Business Manager
Debra L. Johnson, DVM



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

Superintendent
Dr. Lou Obermeyer

Board of Trustees
Douglas G. DeChairo, MD

James Johnson
Donald L. Martin

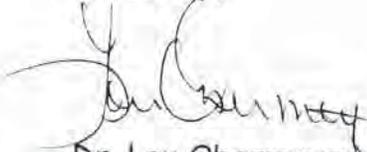
Richard Johnson
Henry P. van Wyk, DVM

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 is 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@sdcountry.ca.gov>

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

Cc: "Grunow, Richard" <Richard.Grunow@sdcountry.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**

Direct Tel: 858-345-3644

MainTel: 858-546-0700 Ext: 134

Fax: 858-546-0770

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Please consider the environment before printing this e-mail.

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

Direct Tel: 858-345-3644

MainTel: 858-546-0700 Ext: 134

Fax: 858-546-0770

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Please consider the environment before printing this e-mail.

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>>

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

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<http://www.eset.com>

Information from ESET NOD32 Antivirus, version of virus signature

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

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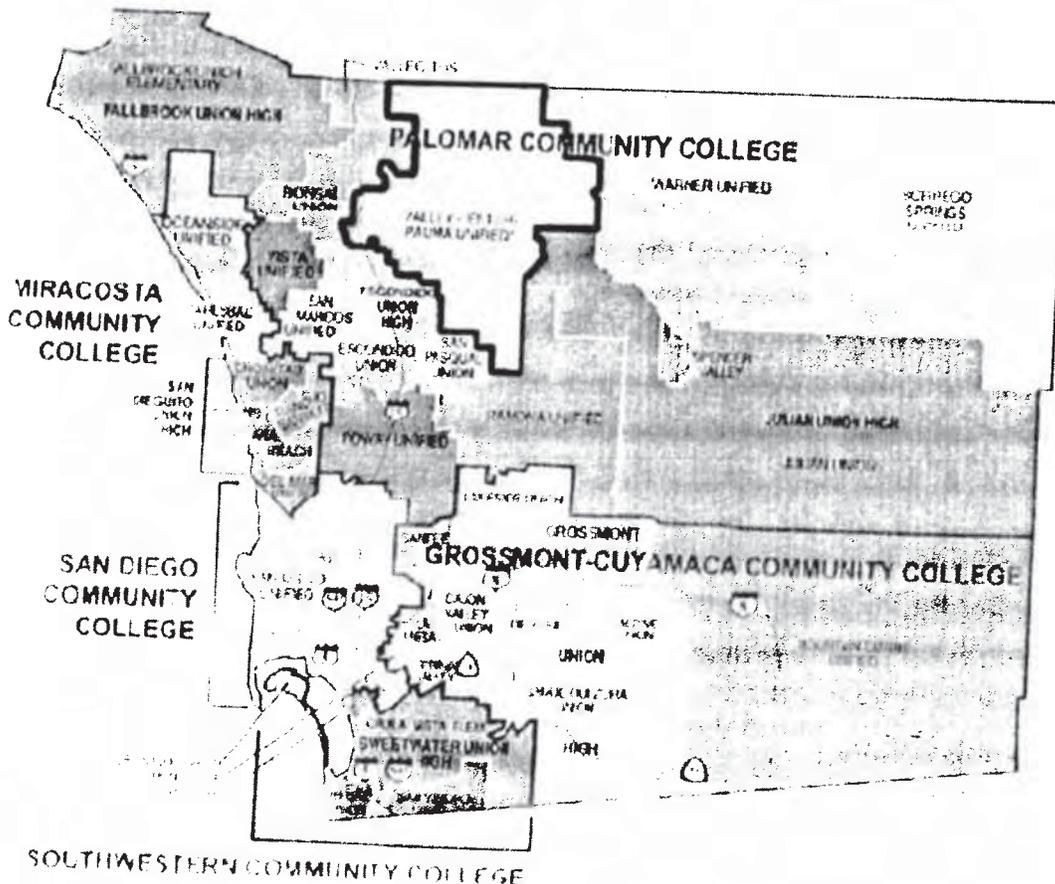
February 28, 2011

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
[Signature]

Board of Trustees
[Signature]

Director, County of San Diego
[Signature]

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.

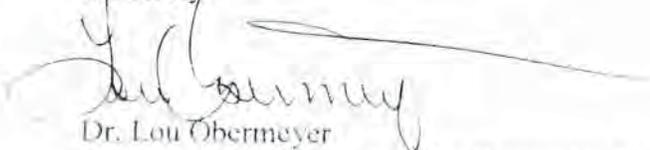
In reading the pre-application summary it is clear that the applicant is contemplating providing a new school. A great deal of planning and coordination with state and local entities are required before a new school site is constructed. In addition to the District's input, communication from local fire 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,



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.

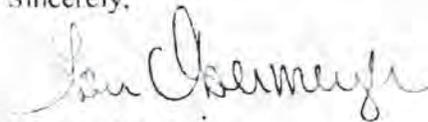
This project appears to possibly be in the Bonsall Union School District as well. We hope you are also requesting their input.

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)

Accetive Investments Inc. (858) 546-0700
Owner's Name Phone

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

San Diego CA 92130
City State Zip

ORG _____
ACCT _____
ACT _____
TASK _____
DATE _____

ELEMENTARY _____
HIGH SCHOOL _____
UNIFIED _____

Sc

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)

numerous - refer to PAs exhibit - may include additional property	

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 Print title: _____ Phone: 760-749-0464

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.

From: Smith, Oliver
Sent: Sunday, July 28, 2013 9:47 PM
To: 'Martinez, Kelly'
Subject: RE: SD Sheriff's review of Lilac Hills Ranch DEIR

Lt Martinez,

Thanks for your help and quick response.

Oliver

From: Martinez, Kelly [mailto:Kelly.Martinez@sdsheriff.org]
Sent: Friday, July 26, 2013 10:49 AM
To: Smith, Oliver
Subject: FW: SD Sheriff's review of Lilac Hills Ranch DEIR

Sorry,

I re read this and it's probably not clear. The Sheriff's Department won't have any comments or concerns for addition. Thanks.

Kelly

From: Martinez, Kelly
Sent: Friday, July 26, 2013 10:45 AM
To: 'Smith, Oliver'
Subject: RE: SD Sheriff's review of Lilac Hills Ranch DEIR

Thank you Oliver for the opportunity to review the DEIR for the Lilac Hills Ranch project. Since the quality and quantity of law enforcement service is not a consideration of the DEIR at this time, it's my understanding that only changes that require new facilities (buildings) to be built are considered on the DEIR? Thank you and have a great weekend.

Kelly

From: Smith, Oliver [mailto:oliver.smith@philips.com]
Sent: Tuesday, July 23, 2013 1:09 PM
To: Martinez, Kelly
Subject: FW: SD Sheriff's review of Lilac Hills Ranch DEIR

Lt. Martinez,

As we talked about on the phone this morning, the Lilac Hills Ranch project released their Draft EIR earlier this month. In it, they stated that the San Diego Sheriff's Dept was the applicable agency for law enforcement services for the project. I would like to have the San Diego Sheriff's Dept review the relevant sections of the Lilac Hills Ranch DEIR relating to law enforcement services and comment on the accuracy and completeness of the applicant's submission.

Attached DEIR Chapter 3 section 3.1.5 deals with Public Services of which the law enforcement services is part. The impact on law enforcement services by the circulation (roads) changes proposed would also seem to be something that could affect response times and access assumptions used by the Sheriff's Dept in developing their previous response to the applicant. I have included the attached DEIR Chapter 2 Traffic Analysis map for review. Please feel free to send any comments and concerns directly to the

county or the Valley Center Community Planning Group would be happy to include them in our response, planned for mid-next month.

Regards,

Oliver Smith
Chair, VCCPG
(760) 918-7331 (work)
(760) 703-1455 (cell)

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Draft Environmental Impact Report (DEIR) Project Alternatives

The County's Project Alternatives Analysis in Chapter 4 of the Lilac Hills Ranch DEIR is grossly defective in meeting CEQA requirements in five areas that are summarized below:

1. The DEIR Objectives against which the Alternatives are judged for Environmental Impacts are biased and should be changed to equitable Objectives, from which compliance against can be fairly measured.
2. The Project does not meet its own Objectives, when fairly assessed.
3. There is a valid offsite Alternative – the Downtown Escondido Specific Plan Area (SPA) that needs to be included as an Alternative.
4. The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives. These three "Alternatives" are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis.
5. The Alternatives were not fairly assessed in the DEIR by the Applicant.
6. When all eight Alternatives are fairly assessed, the Downtown Escondido SPA meets more Objectives than the Project or any Alternatives.

Overview

The Lilac Hills Ranch Project Alternatives from Chapter 4.0 of the DEIR are below:

1. No Project/No Development Alternative
2. No Project / Existing Legal Lot Alternative (49 EDU + no commercial)
3. General Plan Consistent Alternative (110 EDU + no commercial)
4. Reduced Footprint Alternative (1251 EDU + 6 acres of commercial)
5. Reduced Intensity Alternative (881 EDU + 5.6 acres of commercial)
6. 2.2C (Hybrid) Alternative (1365 EDU + 15.3 acres of commercial)

There are no issues with either the selection as an Alternative or analysis performed for the No Project/No Development Alternative, No Project / Existing Legal Lot Alternative, and General Plan Consistent Alternatives.

There is a full Environmental Impact for these Alternatives provided by the San Diego County General Plan dated August 3, 2011. All three of these alternatives were in the baseline (or close enough for measurement error) for the General Plan. The relevant Environmental Impact has been disclosed and analyzed in sufficient detail as part of the recent General Plan process.

The Communities of Bonsall and Valley Center support the General Plan Consistent Alternative as the proper land use and zoning for this Project. The 110 unit residential density with A70 zoning is the maximum density land use that the Circulation Element Road Network will support without Direct Development Impact.

1- DEIR Objectives are biased and should be changed

The legal adequacy of selecting many of the eight Project Objectives does not conform to the requirements of the California Environmental Quality Act (CEQA). Our detailed analysis is enclosed in Attachment A – DEIR Project Objective Issues letter dated July 29, 2013.

2 - The Project does not meet its own Objectives, when fairly assessed

Consistency with Objective One – **THE PROJECT IS INCONSISTENT WITH OBJECTIVE ONE**

The full text of Objective One 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.”

The proposed Lilac Hills Ranch Subdivision is a classic urban sprawl development. All of the transportation will be via automobiles, and the existing and proposed Project post-construction road infrastructure does not support the 9 fold increase in traffic and related Direct Development Impact the Project generates to the public road network.

A fundamental premise of Smart Growth is to lower automobile dependency as compared to average Development. The Accretive proposed Lilac Hills Ranch Development does not comply with Smart Growth Principles.

The SANDAG average miles/trip for all of San Diego County is 5.8 miles/trip.

The Accretive Urban Sprawl (AUS) project is proposing an automobile based urban sprawl community that even with exceedingly high internal trip rates is 47% higher than the San Diego County average (8.52/5.8) trip distance.

How is the Lilac Hills Ranch proposed development Smart Growth?

The ONLY mass transit that exists is the North County Transit District (NCTD) Bus Routes 388 and 389. 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.

This Project is not consistent with the San Diego County Community Development Model. It is Inconsistent with the Community Development Model which a subset of the San Diego General Plan. Why does the first Objective ignore the balance of the General Plan? Because the Proposed Project is patently inconsistent with the San Diego County General Plan, as well as the Community Development Model within the General Plan.

Consistency with Objective Two – **THE PROJECT IS INCONSISTENT WITH OBJECTIVE TWO**

The full text with comment areas 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 and Mountain Ridge/Circle R intersections, 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 and related Direct Development impact of this Project?**

Consistency with Objective Three – **THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE EQUALLY CONSISTENT WITH OBJECTIVE THREE**

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.”

All Alternatives are required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) that must comply with this Objective.

Consistency with Objective Four – **THE PROJECT IS INCONSISTENT WITH OBJECTIVE FOUR**

“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 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 volume and velocity with impermeable surfaces? Does introduction of large quantities of urban surface water runoff Total Dissolved Solids and Pathogens benefit the woodlands?

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

Accretive is proposing disturbing 440 acres of 608 total acres of rural farm land and populating a high percentage of the 440 acres with impermeable surfaces. **Is this what a hydrologically sensitive community is?**

Consistency with Objective Five – **THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE FIVE**

The full text is below:

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

Any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) must comply with this Objective.

Consistency with Objective Six – **THE PROJECT IS CONSISTENT WITH OBJECTIVE SIX BECAUSE THE OBJECTIVE IS BIASED IN FAVOR OF THE PROJECT**

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.”

In this Objective, **the County re-brands dense Urban Sprawl as a desired attribute.** The General Plan Alternative does not meet this objective, because it does not have Urban Density mixed use and senior housing.

This Objective is another example of where **the County has structured the Objectives of the EIR so narrowly with an intended bias such that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives. This approach leads to a self-serving and biased environmental analysis.**

Consistency with Objective Seven – **THE PROJECT AND ALL ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE SEVEN**

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 sole opportunity to increase recycling of waste. The huge amounts of waste the Accretive Urban Sprawl (AUS) requires creation of a recycling center to reduce trash truck route miles such that the project perhaps marginally complies with Traffic Level of Service on trash day.

All of the Alternatives comply with this Objective equally.

Objective Eight - **THE PROJECT AND MOST ALTERNATIVES INCLUDING THE OFF-SITE ALTERNATIVE ARE CONSISTENT WITH OBJECTIVE EIGHT**

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.”

Developing the Project at General Plan densities and preserving agriculture and residential based businesses (such as the existing Accretive Agricultural Operations Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this

Objective **perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.**

3 - A valid offsite Alternative – the Downtown Escondido Specific Plan Area (SPA) has been deficiently ignored.

There exists a reasonable off-site CEQA compliant Alternative to this Project – the 1746 EDU and 90,000 sq. ft. mixed use Escondido Downtown Specific Plan Area (SPA) Project.

The City of Escondido **SINCE 2007** has been developing an infill redevelopment mixed use Downtown Specific Plan Area (SPA) less than 14 miles south from the proposed Lilac Hill Ranch project. The Escondido Downtown SPA has a (City of Escondido) General Plan build-out Equivalent Dwelling Unit increase (EDU) of 5,275 EDU plus additional mixed use commercial uses.

Unlike the Accretive Project, the Downtown 1746 EDU Escondido Equivalent Project **meets Smart Growth and LEED-ND location requirements**, because it is an infill development with requisite infrastructure **truly within walking distance of the Escondido Transit Center** which has access to the Sprinter Train as well as being a hub for North County and Metropolitan Bus lines. Additionally, this location is less than a mile from access to I-15.

The project has existing medical, school, fire, police, and most importantly, Circulation Element Roads and mass transit. The Air Quality and Greenhouse Gas impacts of siting the project in Downtown Escondido are orders of magnitude less than the proposed project site in rural greenfield agricultural lands.

The impact on Biology, Agriculture, and Community are non-existent. The Escondido Downtown SPA supports a project of equivalent size to the proposed Accretive Lilac Hills Ranch project and is consistent with both the City of Escondido General Plan and the County of San Diego General Plan.

The Downtown Escondido SPA also provides a more viable solution for senior living facilities, including Assisted Living, because it is within two miles from the two Palomar Hospitals and major medical facilities.

The Downtown Escondido SPA document is available at the following link, that is also provided as Reference A.
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Please also compare the Escondido Downtown SPA level of specificity and completeness of design to that of the Accretive Lilac Hills Ranch Specific Plan. The *interim* Escondido Downtown SPA is more complete than the Accretive Lilac Hills Ranch Specific Plan.

The EIR for this project cannot exclude the Downtown Escondido SPA Alternative and comply with the California Environmental Quality Act.

4 - The Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid are not valid Alternatives

These three “Alternatives” are density variations of the Project. These Alternatives are also not described in enough detail to provide informed Environmental Impact Analysis. Table 1 below displays all of the information provided in the DEIR with the exception of a one page map for each Alternative:

Table 1 -Scant Attributes of 3 Alternates Provided								
Land Use	Project		Reduced Footprint		Reduced Intensity		2.2 C (Hybrid)	
	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/ Sq. Ft.	Gross Acreage	Units/Sq. Ft.
Single Family Detached	158.8	903	142.1	783	275.5	881	177.0	792
Single Family Senior	75.9	468	71.1	468	0		75.9	468
Single Family Attached	7.9	164	0		0		4.3	105
Commercial/Mixed Use	15.3	211	6.0		5.6		15.3	
Water Reclamation	2.4		2.4		2.4		2.4	
RF/Trailhead	0.6		0		0.6		0.6	
Detention Basin	9.4		5.4		5.5		5.5	
School Site	12.0		9.0		0		12.0	
Private Recreation	2.0		0		0		2.0	
Group Residential/Care	6.5		0		0		6.5	
Institutional	10.7		10.7		10.7		10.7	
Park - HOA	11.8		10.0		3.0		11.8	
Park - Dedicated to County	12.0		6.0		9.0		12.0	
Biological Open Space	103.6		168.8		102.7		103.6	
Non-circulating Road	45.7		45.7		41.5		43.1	
Circulating Road	37.6		37.6		21.5		30.0	
Common Areas/Agriculture	20.2		20.2		65.0		45.0	
Manufactured Slopes	67.5		67.5		65.0		50.0	
Other/Accretive Math Error*	8.1		5.5		0		0.3	
Total	608.0	1746	608.0	1251	608.0	881	608.0	1365
* Table 4-1 from DEIR Chapter 4 Project Alternatives has the indicated arithmetic errors								
sq. ft. = Square Feet								
HOA = Homeowner's Association								

The major observation from independent experts is that these three Alternative are linear scaled variants of the project with inadequate detail to assess Environment Impact.

These Alternatives are described inadequately. The Applicant’s information has

multiple math errors (refer to Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives). The only other information provided is a one page Map that in two Alternatives did not even perform lot allocation (Attachment C- Reduced Footprint Map and Attachment D- Reduced Intensity Map).

This is a deficient level of detail to assess Environmental Impact. There is no definition of Commercial uses and zoning. Despite the naïve arm waving in DEIR Chapter 4, traffic impacts are not linear mathematical relationships. And the list of similar issues to Traffic is very long.

In the interest of brevity, **this is inadequate information to make an informed Environmental decision.**

5 - The Alternatives were not fairly assessed in the DEIR by the Applicant.

Table 2 below rates scoring of Alternatives ***against the Applicant's biased eight Objectives***. The rationale for assessing the Project is contained in Item 2. The three variant Alternatives are scored the same as the Project, except for the 2.2C Hybrid Alternative. The 2.2 C Hybrid Alternative includes Senior Housing, so it scores one Objective higher than the other two.

TABLE 2 - COMPARISON TO PROJECT OBJECTIVES								
Objectives	Project	Alternates						
		Downtown Escondido SPA	No Project/No Development	No Project/Legal Lot	General Plan Consistent	Reduced Footprint	Reduced Intensity	2.2 C Hybrid
1 - 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	No	Yes	No	No	No	No	No	No
2 - 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	No	Yes	No	No	No	No	No	No
3 - 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	Yes	Yes	No	No	Yes	Yes	Yes	Yes
4 - Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff	No	Yes	No	No	No	No	No	No
5 - Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area	Yes	N/A	No	No	Yes	Yes	Yes	Yes
6 - Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing	Yes	Yes	No	No	No	No	No	Yes
7 - Provide the opportunity for residents to increase the recycling of waste	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
8 - Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Total Number of Objectives Met	5/8	7/8	2/8	2/8	4/8	4/8	4/8	5/8

Clearly, the least Environmental Impact ***even to these biased Objectives is the Downtown Escondido SPA Alternative.***

Summary and Conclusion

The County's Project Alternatives Analysis in Chapter 4 of the Lilac Hills Ranch DEIR is grossly defective in meeting CEQA requirements.

Objectives 1 and 6 need to be changed to eliminate the bias that the Applicant has intentionally created.

Additional information and studies need to be performed on the Reduced Footprint, Reduced Intensity, and 2.2 C Hybrid Alternatives.

The Downtown Escondido SPA Alternative accomplishes the same Objectives as the Project with orders of magnitude less Environmental Impact. This Alternative is fully informed in the City of Escondido Downtown SPA Specific Plan and related documents,

Reference A: Escondido Downtown Specific Plan Area

<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Attachment A: DEIR Project Objective Issues letter dated July 29, 2013

Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives

Attachment C – 1251 EDU Reduced Footprint Map

Attachment D – 881 EDU Reduced Intensity Map

Attachment E – 1351 EDU 2.2 C Hybrid Map

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

The County's Project Objectives from the DEIR for the proposed Accretive Investments Lilac Hills Ranch Subdivision are

CHAPTER 1.0 PROJECT DESCRIPTION, LOCATION, AND ENVIRONMENTAL SETTING

1.1 Project Objectives

The proposed project is based on a wide range of reports that studied the different constraints and opportunities involving the project in concert with the County of San Diego and local community issues. The general components of the proposed project were determined using the project objectives described below.

1. 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.
2. 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.
3. 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.
4. Integrate major physical features into the project design, including major drainages, and woodlands creating a hydrologically sensitive community in order to reduce urban runoff.
5. Preserve sensitive natural resources by setting aside land within a planned and integrated preserve area.
6. Accommodate future population growth in San Diego County by providing a range of diverse housing types, including mixed-use and senior housing.
7. Provide the opportunity for residents to increase the recycling of waste.
8. Provide a broad range of educational, recreational, and social uses and economically viable commercial opportunities within a walkable distance from the residential uses.

below:

The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, preventing analyses of alternative sites that meet San Diego County General Plan objectives and leading to a self-serving and biased environmental analysis. *(Insert CEQA and Case cites here)*

The substantiation of this assertion is provided below.

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, already accommodates more growth than SANDAG projects. There is no 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.

The City of Escondido **SINCE 2007** has been developing an infill redevelopment mixed use Downtown Specific Plan Area (SPA) less than 14 miles south from the proposed Lilac Hill Ranch project. The Escondido Downtown SPA has a target Equivalent Dwelling Unit increase (EDU) of from 2,000 to 5,000 EDU.

Unlike the Accretive Project, the Escondido Project **meets Smart Growth and LEED-ND location requirements**, because it is an infill development with requisite infrastructure **truly within walking distance of the Escondido Transit Center** which has access to the Sprinter Train as well as being a hub for North County and Metropolitan Bus lines. Additionally, this location is less than a mile from access to I-15.

The Escondido Downtown SPA also provides a more viable solution for senior living facilities, including Assisted Living, because it is within two miles from the two Palomar Hospitals and major medical facilities.

The Escondido Downtown SPA document is available at the following link, that is also provided as Reference A.
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

Please also compare the Escondido Downtown SPA level of specificity and completeness of design to that of the Accretive Lilac Hills Ranch Specific Plan.

Accretive also makes an unsubstantiated assertion that the Valley Center’s Village, designated by SANDAG as a “Smart Growth Opportunity Area” is not in close proximity to a major transportation corridor – **this is patently false**. 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 Community Plan has designated this area 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.

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** for the 1 ½ to 3 miles the Project needs to connect the 25,000 plus trips for this automobile based urban sprawl project with I-15.

Accretive does not have legal right-of-way to use Mountain Ridge and Covey Lane private roads for the purposes that Accretive proposes for the Project.

Accretive does not own legal right of way, nor can they achieve 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.

Accretive does not have legal right of way for offsite sewer and recycled water pipelines that they indicate on their Preferred Route 3 to the Lower Moosa Water Reclamation Facility.

For the County to state that this Project is in close proximity of a major transportation corridor without an analysis of the ability of this Project to safely manage its traffic burden and pay for the direct off-site impacts of the Project's congestive Level E and F Level of Service that the Project will directly cause **is misleading at best and not in compliance with CEQA and related State and County policies and Regulations.** *(Insert State CEQA and Subdivision Map Act issues; County Subdivision Ordinance and DPW Public and Private Road Design Standards)*

As is discussed below, in the new General Plan, unincorporated communities including Valley Center and Bonsall already accommodate more than their fair share of County growth. In keeping with the "Smart Growth" vision and guiding principles that are essential foundations for the entire County General Plan, growth in these communities has purposefully been 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 new County General Plan has applied this two-part vision to ensure that Valley Center and Bonsall absorb more than a fair share of San Diego County General Plan growth -- without overdeveloping green field areas.

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 is a 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%

Accretive states that the Project is “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.

The proposed Lilac Hills Ranch Subdivision is a classic urban sprawl development. All of the transportation will be via automobiles, and the road infrastructure does not support the 9 fold increase in traffic.

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 a subset of the San Diego General Plan. Why does the first Objective ignore the balance of the General Plan? Because the Proposed Project is patently inconsistent with the San Diego County General Plan, as well as the Community Development Model within the 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 ...”*

First, as the above statement in the County General Plan makes clear, 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. 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.

Summary and Conclusion – Objective One

The County has structured the first Objective of the EIR so narrowly that only the Lilac Hills Ranch Project can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.

(CEQA and Case cites that back the conclusion statement)

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, 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?**

Summary and Conclusion – Objective Two

The project does not meet its own Objective for Objective Two.

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.”

We do not have any issues with this Objective other than to state that **any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.**

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 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?**

Summary and Conclusion – Objective Four

The project does not meet its own Objective for Objective Four

Objective 5 – The full text is below:

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

We do not have any issues with this Objective **other than to state that any Project required to have a Discretionary Permit approved (including a Map approval for the General Plan Compliant Alternative) would have to comply with this Objective.**

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.

In this Objective, **the County re-brands dense Urban Sprawl as a desired attribute.** The General Plan Alternate does not meet this objective, because it does not have Urban Densities.

This Objective is another example of where **the County has structured the Objectives of the EIR so narrowly with an planned bias that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis.**

Objective 7 – The full text is below:

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

We do not have any issues with this Objective other than to state that having an on-site recycling facility is not the only opportunity to increase recycling of waste; with the huge amounts of waste the **Accretive Urban Sprawl (AUS)** creates one is necessary to marginally comply with Traffic Standards on trash day.

All of the Alternatives comply with this Objective equally

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.”

Developing the Project at General Plan densities and preserving agriculture and residential based businesses (such as the existing Accretive Agricultural Office located on 32444 Birdsong Drive) on the same or nearby Parcels achieves this Objective **perhaps better than the Proposed 1746 EDU Accretive Urban Sprawl Project.**

Summary

The County has structured the Objectives of the EIR in aggregate so narrowly that only the Lilac Hills Ranch Project as proposed by the Applicant can fulfill the Project Objectives, leading to a self-serving and biased environmental analysis. *(re- insert CEQA and Case cites here)*

Sincerely,

(Your Name)
(Your Street Address)
(Your City, State, and Zip)

Reference A: Escondido Downtown Specific Plan Area
<http://www.escondido.org/Data/Sites/1/media/pdfs/Planning/DowntownSpecificPlan.pdf>

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

Attachment B – Table 4-1 from DEIR Chapter 4 Project Alternatives

TABLE 4-1
LILAC HILLS RANCH CEQA ALTERNATIVES

Land Use	Alternative																			
	1			2			3			4			5			6				
	No Project - No Development			Existing Legal Lots			GPU Consistency			Reduced Footprint			Reduced Intensity			2.2C (Hybrid)				
Gross Acreage	Units/Sq. Ft.	Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Sq. Ft.	Gross Acreage	Units/Sq. Ft.	Sq. Ft.
Single-family Detached	158.8	903	608	608.8	49	351.4	110	783	142.1	783	275.5	881	177	792						
Single-family Senior	75.9	468	0	0	0	0	0	468	71.1	468	0	0	75.9	468						
Single-family Attached	7.9	164	0	0	0	0	0	0	0	0	0	0	4.3	105						
Commercial/Mixed-use	15.3	211	0	0	0	0	0	0	6	0	5.6	0	15.3	0						
Water Reclamation	2.4	0	0	0	0	0	0	0	2.4	0	2.4	0	2.4	0						
RF/Trailhead	0.6	0	0	0	0	0	0	0	0	0	0.6	0	0.6	0						
Detention Basin	9.4	0	0	0	0	0	0	0	5.4	0	5.5	0	5.5	0						
School Site	12.0	0	0	0	0	0	0	0	9	0	0	0	12	0						
Private Recreation	2.0	0	0	0	0	0	0	0	0	0	0	0	2	0						
Group Residential/Care Institutional	6.5	0	0	0	0	0	0	0	0	0	0	0	6.5	0						
Park - HOA	10.7	0	0	0	0	0	0	0	10.7	0	10.7	0	10.7	0						
Park - HOA	11.8	0	0	0	0	0	0	0	10	0	3.0	0	11.8	0						
Park - Dedicated to County	12.0	0	0	0	0	0	0	0	6	0	9.0	0	12	0						
Biological Open Space	103.6	0	0	0	0	256.6	0	168.8	0	168.8	102.7	0	103.6	0						
Non-circulating Road	45.70	0	0	0	0	0	0	45.7	0	45.7	41.5	0	43.1	0						
Circulating Road	37.6	0	0	0	0	0	0	37.6	0	37.6	21.5	0	30	0						
Common Areas/Agriculture	20.2	0	0	0	0	0	0	20.2	0	20.2	65.0	0	45	0						
Manufactured Slopes	67.5	0	0	0	0	0	0	67.5	0	67.5	65.0	0	50	0						
TOTAL	608.0	1,746	608	608.0	49	608.0	110	1251	608	110	608.0	881	608	1365						

sq. ft. = square feet

HOA =homeowners association

Attachment C – 1251 EDU Reduced Footprint Map

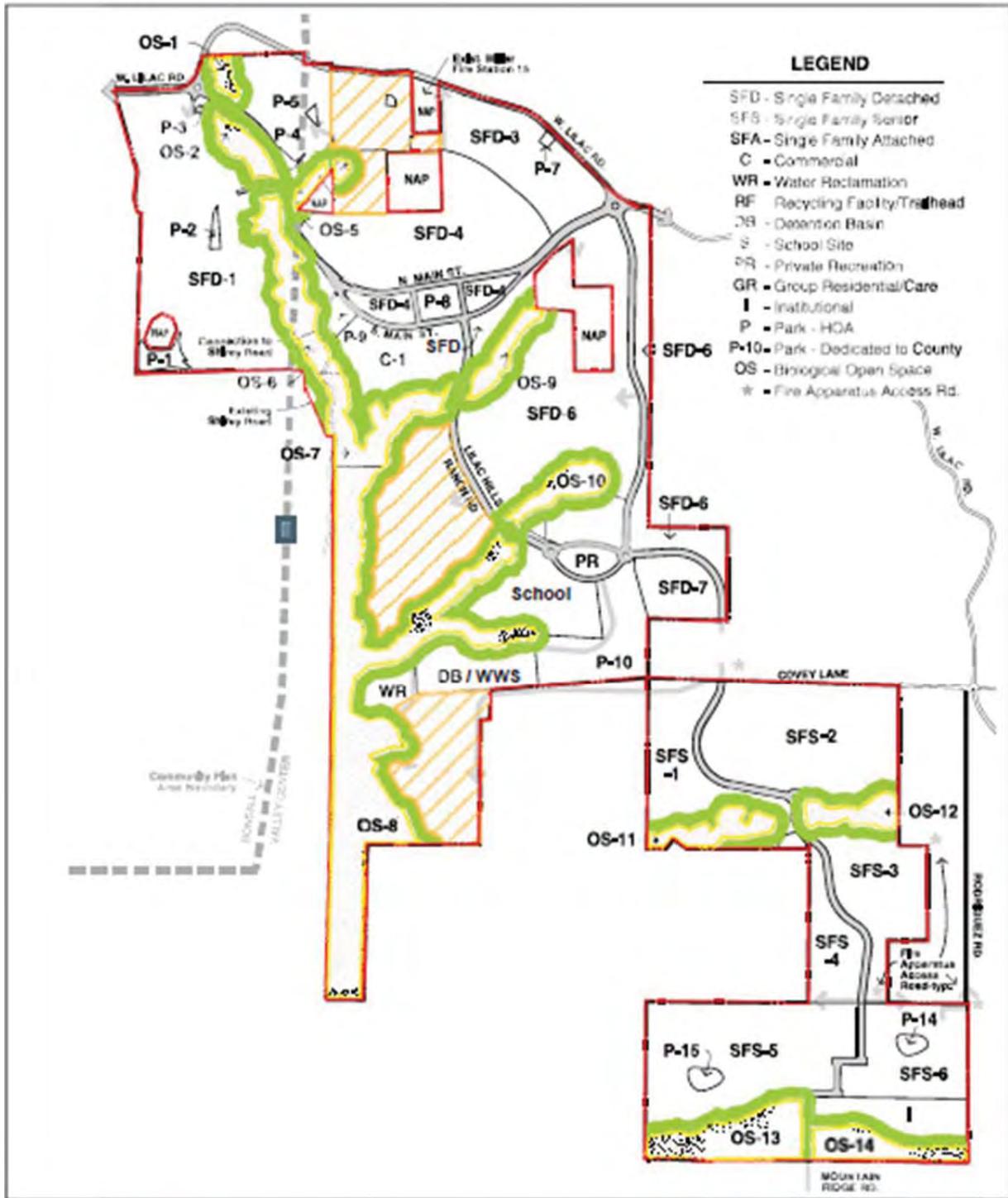


FIGURE 4-3
Reduced Footprint Alternative

Attachment D – 881 EDU Reduced Intensity Map

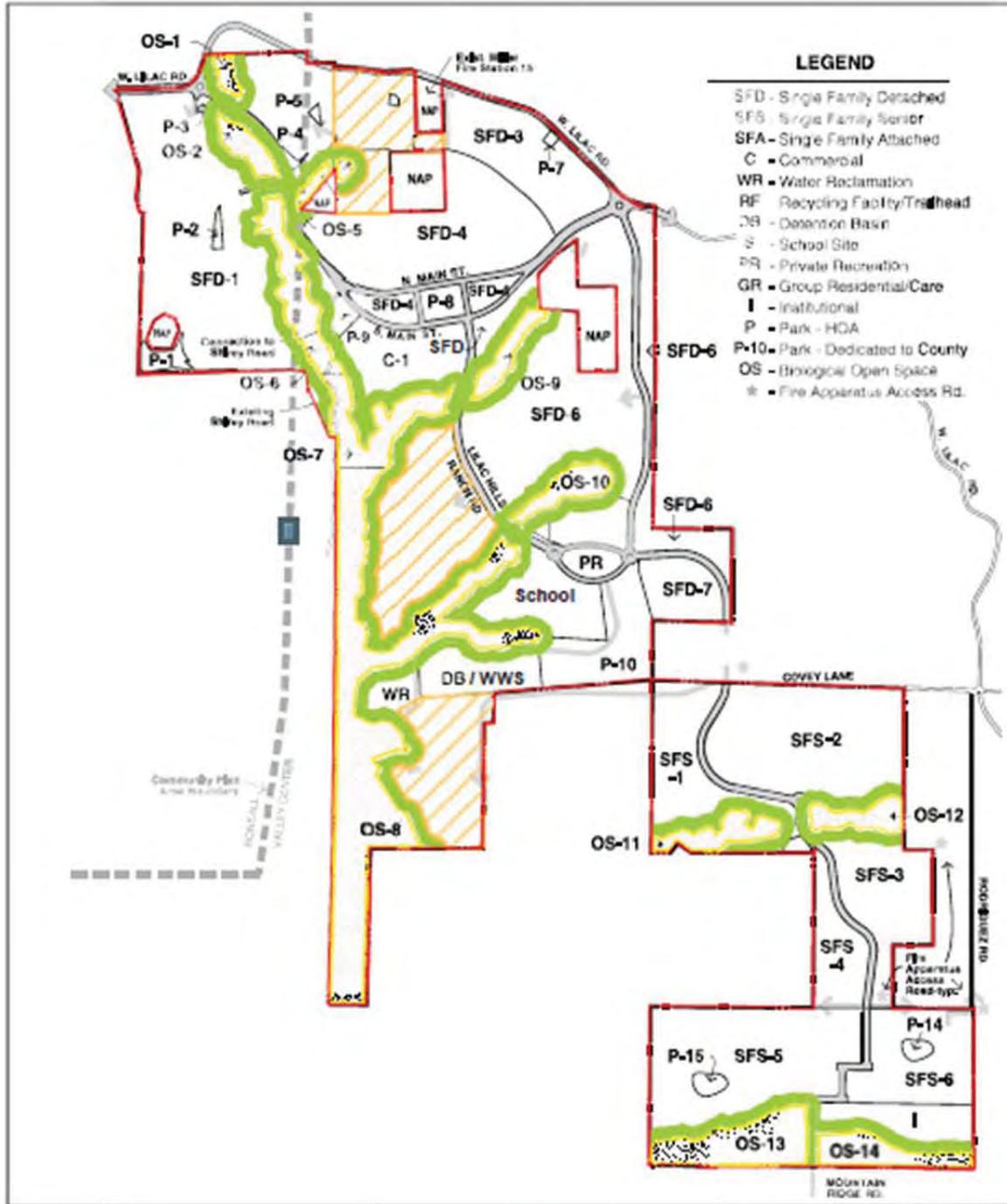


FIGURE 4-3
Reduced Footprint Alternative

Attachment E – 1351 EDU 2.2 C Hybrid Map

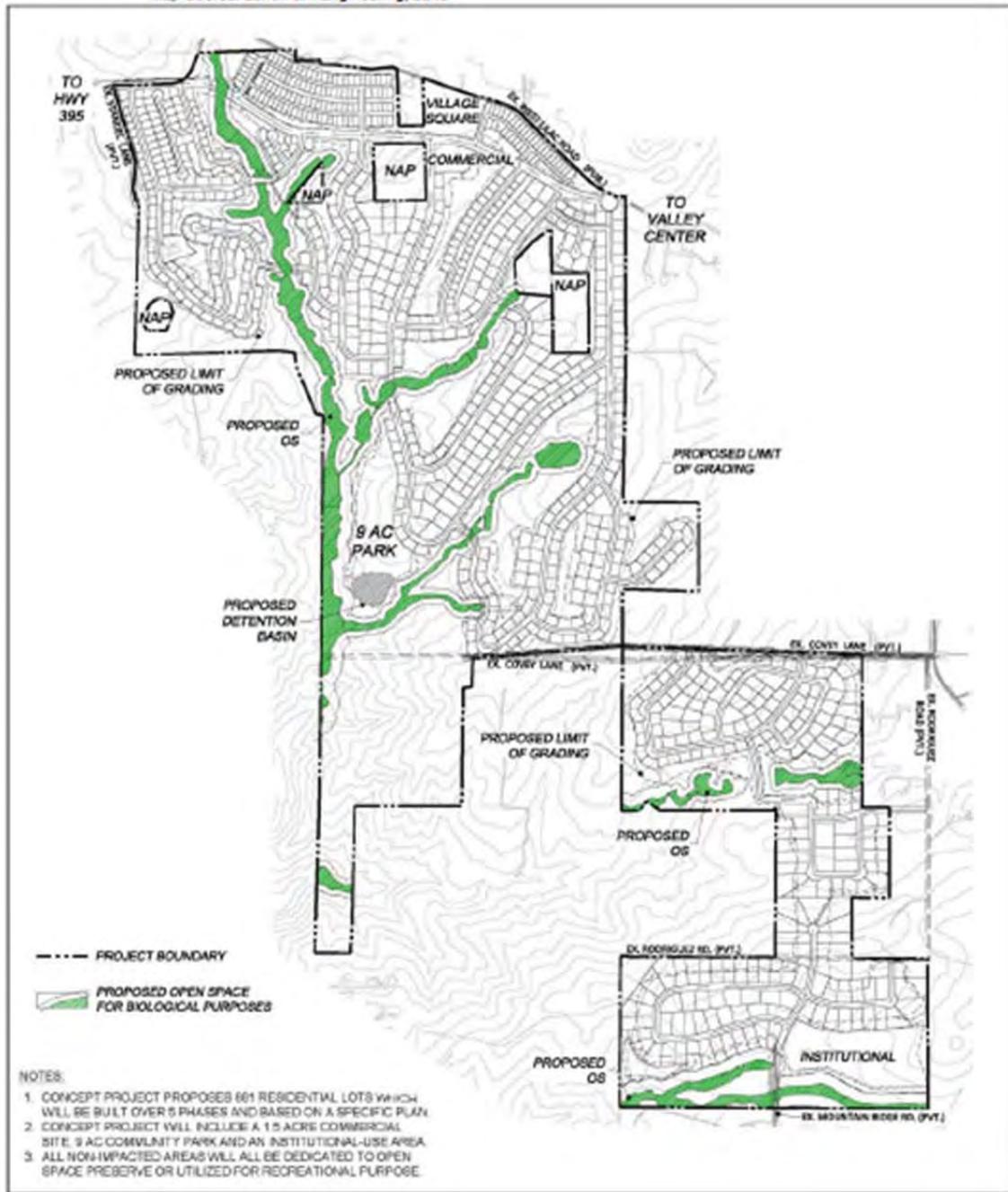


FIGURE 4-4
Reduced Intensity Alternative

Lilac Hills Ranch Specific Plan Valley Center Community Planning Group – Comments

Introduction

This set of comments is the fourth prepared for the Lilac Hills Ranch [the Project] Specific Plan in little over a year. Typically, that would mean that there has been a healthy exchange of ideas and concerns between the community and the Project applicant over the course of that time. And, such an exchange would result in a project that more closely resembles what the community says it wants in the General Plan and Valley Center Community Plan. However that is not the case. Instead, the applicant has chosen to be insulated from the public forums established by the Valley Center Community Planning Group, choosing to select supporters to attend private, invitation-only promotional meetings, and calling them public. This has resulted in a Project that is at odds with the vision for the community expressed by the community in the San Diego County General Plan and Valley Center Community Plan.

According to the “Community Design and Operation Goals” of the Specific Plan, this Project intends to

“Ensure the orderly and sensitive development of land uses within Lilac Hills Ranch Specific Plan to safeguard and enhance the appearance, quality, and value of development in the Valley Center and Bonsall Community Planning Areas.”

The language is lofty and seemingly respectful of the community that surrounds the Project. However, rather than respect the productive agriculture of the area, or the remaining natural habitat of the area, or the community’s vision for the area, the applicant is focused on land uses and the value of development. For developers, this stance is not surprising. What is surprising is that, as so-called professionals, they have chosen to ignore the County’s General Plan for the area and the specific Valley Center and Bonsall Community Plans that purportedly govern land use and development in the area. This flagrant disregard for the General Plan and the community plans comes only two years after the 12-year, nearly \$20 million effort to implement them. It causes one to wonder if conditions in north San Diego County have changed so much in two years that such changes could conceivably be warranted? In fact, nothing has changed since the General Plan and community plans were adopted. However, as the first major leapfrog development planned in San Diego County since the adoption of the General Plan, if approved, this Project could set a precedent that would reverberate throughout the unincorporated countryside of the County.

In the section of the Specific Plan titled, “Community Design and Operation Policies,” the applicant continues to feign respect for the General Plan:

“Limit development to those uses permitted by and in accordance with development standards contained in the County of San Diego Zoning Ordinance, the County General Plan, the Lilac Hills Ranch Specific Plan and future detailed approvals and permits for the property. The Lilac Hills Ranch Specific Plan is intended to further implement the policies and development standards set forth in the County General Plan, and the Valley Center and Bonsall Community Plans provided however, in cases where there are discrepancies or conflicts between the Lilac Hills Ranch Specific Plan and the County’s development regulations or zoning standards, the provisions of the Lilac Hills Ranch Specific Plan shall prevail.”

The applicant says they will develop in accordance with the development standards of the San Diego County Zoning Ordinance and the County General Plan – but only after they have significantly changed them to conform to this Specific Plan and its diametrically opposed urban – rather than rural – standards. Further, to avoid future disagreements with the General Plan and the Community Plans, they propose to usurp the authority of those documents and allow their own Specific Plan to supersede them. Most property owners in the County would like to be able to supersede the General and Community Plans from time to time, but, instead the entire unincorporated area of San Diego County came together and agreed to update the General Plan in a way that applies to everyone equally – or so we thought.

Under “Specific Plan Goals,” the applicant states the desire to:

“Create a mixed-use pedestrian oriented sustainable Community for an area on the outer boundaries of the Bonsall and Valley Center community planning areas. This new Village will augment the several other large scale projects adjacent to this section of I-15 between Escondido and Fallbrook by introducing new mixed-use pedestrian oriented land uses with a variety of housing types and create employment, retail and service opportunities that are not currently present.”

The words “mixed-use, pedestrian-oriented, and sustainable” are charming until the realization sets in that ‘mixed-use’ means urban densities where rural ones exist; that ‘pedestrian-oriented’ can only make sense on the smallest scale given the vertical curves, elevation changes and distances within the Project; and that ‘sustainable’ was added because it pleases planners not because the 5000+ residents of the Project will be able to find well-paying jobs within the Project. This Project straddles Bonsall and Valley Center planning area boundaries. They are two existing rural communities identified in the General Plan. Adding this urban Project is an attempt to encroach on agricultural lands with low-density land use designations and will result in growth inducement as well as undermining the planned town centers for both communities. Housing, retail employment, and service opportunities are not currently present within the Project area because it was planned that way and the plan already accounts for those things in the town centers of Bonsall and Valley Center.

Finally, “Specific Plan Goals” summarizes:

“Overall, the specific plan seeks to balance population and housing needs with open space, agricultural land use, and the development of infrastructure for the Community.”

And yet, the General Plan has already accounted for the population and housing needs of the future within Bonsall and Valley Center without the Project, so there is no additional need to be met. This Project will essentially destroy or disrupt 608-acres of open space and agricultural land, so there will be no balance. And, according to the General Plan Principles, such trade-offs between development and agriculture/open space are to be avoided.

Once again, we have listed our concerns below, as we have listed them three times before. Our hope is that these concerns will be addressed in a way that is consistent with the Valley Center Community Plan and the County’s current General Plan. We emphasize that these present concerns should be understood to include the previously submitted concerns of July 9, 2012, October 22, 2012, and March 11, 2013, where they still apply.

Major Concerns

1. *The Lilac Hills Ranch Project [the Project] is too large and too dense for Valley Center and it is improperly located*– Placing 1,746 homes and 5,000+ people on 608 acres with densities as high as 20+ dwelling units [DU] per acre is simply incompatible with the rural, agricultural location in which the Project has been sited.

2. *Roads and Traffic*– The nature of the roads that must carry traffic generated by the Project is one of the most fraught and difficult topics associated with this Project. The area has been able to move cars across winding, two lane roads that pass through hilly landscape only because of its present rural density. With the addition of 1,746 homes extensive new road construction plus considerable widening and straightening of existing roads, will be required to safely and efficiently handle the additional 5,000+ individuals who will populate the development. The County’s very limited road construction budget is already over-taxed, and unlikely to provide for the huge influx of automobiles created by The Project. Questions of the cost of off-site road construction, evacuation needs, and acquisition of rights-of-way over existing private roads by the applicant, are also extremely challenging.

3. *Compliance with the General Plan*– The Project’s Specific Plan threatens to overturn virtually every element in the County’s new General Plan adopted in 2011 after 12 years of discussion, compromise and community involvement, nearly \$20 million in government expenditures and countless hours of effort on the part of local citizens. Approval of this Project will require damaging

amendments to the General Plan and the Valley Center and Bonsall Community Plans that will be growth inducing, particularly in the western portion of Valley Center. If the Project is allowed to proceed, one has to question if there is any development that would be rejected because it violated the principles and policies of the General Plan and Community Plans. In the context of this Project, it is unclear that the General Plan is anything more than a placeholder until the next change is proposed.

4. *Services and Infrastructure - Water, Schools, Fire, Waste Treatment-* Infrastructure is expensive. Putting in new roads, adding additional lanes to a bridge, building a fire station, putting up a new school, installing sewer and waste treatment plants and building trails all cost large amounts of money. A principal reason why the General Plan Update strongly favors “compact, town center developments” while stating that it intends to limit “growth in areas without adequate roads, water and sewer service” is because of the demands on the public purse for building and then maintaining these infrastructure items over and over.

The Project is seeking to build a city the size of Del Mar, CA that will require an almost entirely new infrastructure—new roads, schools, sewer systems and a broad range of other infrastructure items. These infrastructure expansions are why the Valley Center Community Plan designates the north and south villages at the core of Valley Center for such housing and commercial densities. The Community Development Model also directs that kind of concentration of density and infrastructure not at the outer edge of the community as this Project proposes, but at the Valley Center core.

5. *LEED-ND/Sustainable and Walkable Community* This Project still has not meaningfully addressed the requirements for LEED-ND development, although it continues to be described as “expected to meet the standards of the LEED-ND or an equivalent program.” There is no equivalent program cited and the Project fails to meet any of the site location and linkage requirements listed in the LEED-ND pre-requisites and standards [https://www.nrdc.org/cities/smartgrowth/files/citizens_guide_LEED-ND.pdf]. The Project also cites its consistency with the Guiding Principles and the Community Development Model in the General Plan for San Diego County. However, even a cursory examination of those principles and the model show that, rather than being consistent, the Project is conversely inconsistent with both the Guiding Principles and Community Development Model. The ‘community’ that needs to be addressed is the Valley Center community, and the Project should be understood as an element of that community. The General Plan presently applies the Community Development Model to the Valley Center community and the zoning and land use patterns within Valley Center are consistent with that model. The same is true for the Bonsall community. The proposed addition of the LHR Project in the western portion of the Valley Center community flouts the intention of the Community Development Model by establishing high-density development

away from the community center, away from needed infrastructure, and in a designated agricultural area. The Project is leapfrog development and it does not qualify as a LEED-ND community under any reasonable interpretation of those standards.

The claim is made that all 1746 dwelling units will be within one-half mile of at least one of the three proposed commercial nodes in order to support the concept of 'walkability'. However, the three commercial services areas are not of equal size, and will not have equivalent services available. The bulk of the commercial services will be available only in the northern node with substantially fewer services available in the other two nodes. In addition, the changes in elevation from one end of the Project to the other will tend to discourage walking, especially for senior citizens. Thus, residents in the central and southern sectors will likely still drive the one to two miles north for more than convenience store services.

6. Agriculture– The General Plan Update of 2011 has set aside the area where The Project would be built as a place for agriculture and other rural and semi rural uses. In contrast to the claims made by the Project applicants, the area is not characterized by *historical* agricultural activity. It is a present-day agricultural area with a long, continuous history of agriculture. Avocado, citrus, cactus commercial nurseries and other farm operations are located in and around the Project areas. These agricultural uses attract insect and fungal infestations, which mean that aerial spraying is often necessary. Spraying could pose a danger to individuals living in the area. On the other hand, prohibiting spraying would make farming nearly impossible. Building The Project at the planned site would greatly damage many currently productive and successful agricultural operations. [see Table 1 and Figure 1]

7. Twists of meaning and lack of clarity in the plan– One of the most difficult aspects of the Project's Specific Plan is the extent to which it makes misleading claims. They would have us believe that they are building a LEED-ND or equivalent development even though The Project violates nearly all LEED-ND standards for site selection and linkage; that adding 5,000 residents to a rural, agricultural area actually improves traffic over narrow, winding rural roads; that grading and moving 4.4 million cubic yards of earth (enough to build a path 4-feet wide around the equator of Earth) preserves natural resources and habitat for animals.

In addition, after criticizing three previous iterations of the Specific Plan, this version continues to use conditional and indefinite language to describe aspects of the Project that should be, at this stage, unconditional and definite. It seems as if the applicants want us to review and approve a suggestion, or an idea rather than a definitive plan that correctly describes their intentions.

Other Concerns

Distribution of Land Uses

Table 1. The County General Plan Conservation and Open Space Element established goals of 10 acres of local parkland and 15 acres of regional parkland per 1,000 persons. The little over 20 acres proposed for public and private parks in this Project falls well short of this goal.

Water Resources

While the Specific Plan notes that imported water usage by the proposed project will be equal to or less than the usage by the present agricultural uses, the proposed imported water usage will not produce a significant amount of agricultural products. So water consumption will be about the same but production will be drastically lower.

General Plan Conformance

The Project's Specific Plan, in several sections, addresses the General Plan and Valley Center Community Plan. Yet the Project's Specific Plan fails to adequately acknowledge the fact that both of these thoughtfully constructed governing documents intend a completely different set of uses for the Lilac Triangle of west Valley Center, and fails to provide justification for the dramatic changes it proposes. The area was zoned for and intended to accommodate agricultural activities and large-acreage residential uses. The proposed Project is clearly incompatible with these intended uses. Both the General and Valley Center Community Plans designate other areas for land-uses such as the Project proposes. If one were to propose and construct a residential project of this magnitude that would be useful to society in general and this region in particular, they would apply their efforts to the central village area of Valley Center. The current Project, as proposed, is a cynical endeavor.

The applicant plans to locate up to 2.9 units per acre on land that currently allows, under the new County General Plan, 1 dwelling until per four acres (for 400 of the acres) or 1 dwelling per 10 acres (for 132 of the acres). Thus the land on which the applicant wishes to build 1,746 homes is reserved in the General Plan for **much** lower density. The applicant would increase the density more than 13 times the present allowable density. Thirteen times the allowable density indicates callous disregard for community character and community concerns.

Consider the 10 guiding principles that the San Diego County General Plan outlines for development:

1. Support a reasonable share of projected regional population growth.
2. Promote health and sustainability by locating new growth near existing and planned infrastructure, services, and jobs in a compact pattern of development.
3. Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities.
4. Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
5. Ensure that development accounts for physical constraints and the natural hazards of the land.
6. Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation.
7. Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
8. Preserve agriculture as an integral component of the region's economy, character, and open space network.
9. Minimize public costs of infrastructure and services and correlate their timing with new development.
10. Recognize community and stakeholder interests while striving for consensus.

Can anyone who has read the Project's Specific Plan submission believe that it does not violate at least 8 or 9 of them? It requires the development of new roads, a new sewer system, and new water sources—all of them described vaguely and many of them resources to which the applicant does not have clear title or a well developed plan for acquiring. It moves over 4 million cubic yards of earth by grading and by blasting. It is far from the heart of Valley Center where denser development is being accommodated.

Parcel Size Distribution.

The applicant seems to be suggesting that the Lilac Triangle is already more densely developed than they propose for their Project. In the One-mile Radius, figure 6, the applicant suggests that 81% of lots are smaller than the General Plan allows. This use of percentages is misleading. 36% of all the lots in the One-mile radius [according to the applicant's analysis] are 2 to 4-acres and were consistent with the previous General Plan minimum parcel size. Additionally, by the applicant's analysis, 46% of parcels are larger than 4-acres, many much larger. And, viewed another way, 73% of all lots are 2-acres or more within the one-mile radius of the Project. The present General Plan was adopted two years ago, and many of the smaller lots were "allowed" under previous plans. More importantly, it is more instructive to look at the acreage in each parcel-size category to describe the character of the neighborhood. Clearly most of the acreage is in parcels larger than 4-acres, and that is a more equitable way to assess neighborhood character. The present General Plan intentionally takes a

less intense approach in this area in an effort to retain existing agricultural land, most of which is represented by fewer, larger parcels. This is consistent with the Community Development Model, since higher density development is focused at the Valley Center community center along Valley Center Road.

Some of what the applicant chooses not to recognize is that, in the Five-mile Radius, figure 5, many of the developments they cite are clustered developments with an underlying density of 1 DU per 2-acres [i.e. Circle R Ranch, Lake Rancho Viejo] and not developments with lots as small as or smaller than those proposed for The Project. Further, developments like Welk Resort are not single-family developments, but resort/timeshare clustered developments, also with an underlying 1 DU per 2-acres density. The present distribution of parcel sizes should not be misused to justify the proposed development.

It should be remembered that the recently adopted General Plan and the associated community plans are the defining factors in describing the desired plan for the community rather than the parcel size analysis of the applicant.

Relationship to General Plan

Consistency with the recently adopted General Plan is a fundamental first step in proposing a development of this magnitude...a step that this Project continues to stumble over.

The degree of change proposed by this Project will grossly change the character of the existing rural, agricultural area of the Lilac Triangle and the larger communities of Valley Center and Bonsall.

Development Approvals Needed

Apart from the need to amend the General Plan, and the Valley Center and Bonsall Community Plans, the applicant is asking for approval of a site plan for "V" and "D" special area regulations. Setback designator "V" allows for very close urban spacing of buildings, spacing that is grossly inconsistent with the General Plan as it relates to Valley Center and, consequently, the Valley Center Community Plan.

Special Area Regulator 'D' has several Site-Plan criteria that this Project fails to adequately address:

***a. Building Characteristics.** The dimensions, color, architectural design of the proposed buildings and structures shall be compatible and in keeping with those existing in the designated area."*

The proposed Project intends to inject a sweepingly new architectural

treatment to the designated area. The types, dimensions, densities and architectural design being proposed are not consistent with the Lilac Triangle.

“b. Building and Structure Placement. *The placement of buildings and structures shall not detract from the visual setting or obstruct significant views.”*

The density and heights of proposed buildings and other architectural features will dramatically and adversely impact the present rural, natural and agricultural setting of the area. This impact cannot be mitigated under the provisions set forth in this specific plan and will irrevocably deprive existing residents of their expectation of a rural, natural life style and environment.

“c. Landscaping. *The removal of native vegetation shall be minimized and the replacement vegetation and landscaping shall be compatible with the vegetation of the designated area and shall harmonize with the natural landscaping. Landscaping and plantings shall be used to the maximum extent practicable to screen those features listed in subsections “d” and “e” of this section and shall not obstruct significant views, either when installed or when they reach mature growth.”*

The Project proposes to excavate and fill over 4 million cubic yards of earth in pursuit of building sites and common areas on a total of 582.2 acres. Nearly all of the native and agricultural vegetation will be removed and existing agricultural areas will be severely diminished and completely altered on those acres as a result. The proposed plan will leave narrow strips, of so-called, biological open space that will be of little or no use to wildlife due the edge effects of human intrusion, invasive plants, night lighting, domestic dogs and cats, and fuel modification zones.

“d. Roads, Pedestrian Walkways, Parking and Storage Areas. *Any development involving more than one building or structure shall provide common access roads and pedestrian walkways. Parking and outside storage areas shall be screened from view, to the maximum extent feasible, by existing topography, by the placement of buildings and structures, or by landscaping and plantings.”*

The roadways proposed do not provide adequate ingress and egress for the proposed housing and commercial areas. The applicant has failed to provide substantive documentation of legal rights to develop adequate access routes for evacuation requirements. Further, the trail network proposed appears to depend on access along Covey Lane, a private easement for which the applicant has demonstrated no legal right.

“e. Grading. *The alteration of the natural topography of the site shall be minimized and shall avoid detrimental effects to the visual setting of the designated area and the existing natural drainage system. Alterations of the natural topography shall be screened from view by landscaping and plantings which harmonize with the natural landscape of the designated area, except when such alterations add variety to or otherwise enhance the visual setting of the designated area.”*

As noted earlier, the Project proposes to move nearly four and a half million cubic yards of earth on the 608-acre site, with blasting required for about 20% of that total. Obviously, this will not result in minimal alteration and it will detrimentally affect, in the grossest way, the visual setting of this rural, agricultural area.

“f. Signs. *The number, size, location, and design of all signs shall not detract from the visual setting of the designated area or obstruct significant views. Subsequent to the site plan review and approval, any alteration to signs other than general maintenance shall be subject to a new Site Plan or an Administrative Permit.”*

The only reference to signage found concerns the monuments at the entrances to the Project and a standard for other signage is not defined except as to possible locations. The monuments description in the specific plan is more nearly marketing language than specific details about construction design and materials. A conceptual design is provided, but it is merely suggestive and provides no assurance that it is consistent with the Valley Center Design Guidelines. Clearly, the Specific Plan should defer to the existing Valley Center Design Guidelines, and those guidelines should be acknowledged in this plan to direct the implementation of signage for the Project as a whole, but especially for the commercial areas within the Project.

“g. Lighting. *The interior and exterior lighting of the buildings and structures and the lighting of signs, roads and parking areas shall be compatible with the lighting employed in the designated area.”*

Since the designated area is presently rural and agricultural and subject to the Valley Center Design Guidelines, the Project and its specific plan should recognize those guidelines as the authority for all lighting implementation. Generally, little lighting is used in this area presently, so any change will be a significant departure from what exists and will severely challenge the present conditions. It will also exacerbate the light in the night sky that is such a challenge for the Palomar Observatory and their 200-inch telescope, a national asset. No matter how “sensitive” such street, architectural and signage lighting attempts to be, it all adds to the light “noise” in the night sky, obscuring views of the stars, and creating an

urban atmosphere where a darkened rural one should exist.

The applicant is changing course again by deferring to the judgment of the Valley Center Municipal Water District [VCMWD] for a wastewater treatment plan and the need or no need for an on-site wastewater treatment facility. The Specific Plan, quite non-specifically, offers two alternative concepts for such an on-site treatment plant. The first is an on-site water reclamation facility with solids treatment. The second is a scalping plant that skims water from the sewage, while the remaining sewage liquid and solids would be piped off-site. VCMWD apparently prefers another alternative, which is to transport sewage through a forced main a few miles to the south to its Lower Moosa Canyon treatment facility. This facility is capable of only secondary-treatment, so any reclaimed water would be percolated back into the ground rather than applied to golf courses or other landscaping, unless the plant is upgraded. A significant problem for this approach is the fact that sufficient right-of-way does not exist to construct the sewage forced main or recycled water lines. This Specific Plan should specify which approach is to be undertaken rather than offer options, especially options fraught with intractable hurdles.

Another approval needed by the applicant is for the vacation of two existing biological open space easements totaling 3.64 acres. These two easements were at one time considered important set-asides for maintaining regional biological resources – resources that cannot be turned on and off and still retain significance. The applicant will be setting aside 103 acres of open space for the same purpose. It would seem prudent and reasonable to include the two existing easements in addition to the proposed easements for this Project.

Specific Plan Goals

The applicant suggests that their Project will “augment” the several other large-scale projects along I-15 between Escondido and Fallbrook. A thoughtful analysis of the referenced projects will show that the only other project that compares with this Project is Lake Rancho Viejo at Highway 76, a clustered development with an underlying density of 1 DU per 2 acres. The other projects were approved under an older General Plan and the two largest projects, Castle Creek and Lawrence Welk Resort, are actually clustered developments with an associated open space component of about 40% of the total acreage, unlike this Project, which is currently expressing only a 16% open space component.

That being said, a guiding principal of the current General Plan [principle #2] is to permit high-density development within or next to already developed property so that the infrastructure requirements can be more easily met. The goal is not to spread dense development to outlying rural areas where infrastructure must be extended and expanded to meet those needs, as is the case with this Project.

As a leapfrog type of development, the proposed Project must meet the LEED-ND certification or equivalent requirements as specified in the General Plan,

which it fails to do. Clearly, the County's Community Development Model applies to, and is consistent with, the present General Plan and Valley Center Community Plan for the entire Valley Center community. It is a misrepresentation of the intent of the General Plan and the Community Development Model to suggest that the proposed Project conforms to those concepts, models and plans. The proposed Project is ignoring the Valley Center community in order to focus attention within its boundaries.

Sustainable Community Goals/Policies

In this iteration of the specific plan the applicant has chosen to diminish their commitment to sustainability by making some of their once 'earnest' goals and features decidedly optional. The recycling facility will be built "if feasible." Shouldn't the Specific Plan decide feasibility in such cases? It is a hollow feature otherwise. The use of existing Green Building standards already adopted by the County will be implemented as required, but builders of the Project will be required only to "offer homeowners the option of installing energy efficient fixtures and appliances." The applicants have abandoned completely their earlier commitment to implementing structural systems that achieve high performance thermal efficiency in buildings. And, they will only "Encourage the use of feasible best management practices to maintain the current level of water runoff [discharge] leaving the site close to pre-development levels." These sagging goals seem disingenuous. They are long on 'encouragement' but short on commitment, determination and requirement. [Underlines added]

Circulation Plans and Policies

The applicant is asking for road standard modifications to downsize rights-of-way, road, and lane widths required for off-site and on-site roads. These amendments are moving in the wrong direction for safety. Further, the five restricted gated access points are problematic for safe egress from the southern portion of the Project. The Valley Center Community Evacuation Route Study determined that locked gates on proposed evacuation routes were too unreliable in an emergency situation when there is a shortage of fire fighting and sheriff's department personnel available to open gates.

The maps contained within the Specific Plan show an off-site location for a private road ostensibly to be used for internal, on-site circulation purposes. It extends roughly from the western end of Covey Lane westward across land that is outside the Project boundary. Does the applicant have rights to use that path for the road? Also, the road from the eastern edge of the central part of the Project south to Covey Lane continues to be unexplained. Does the applicant have rights to that route? Does the applicant own that route? If the applicant owns that route, which County records seem to indicate, why is it not included within the Project boundaries?

County Land Use Regulations

The applicant has not justified their proposed general plan amendment to amend the Regional Land Use Element Map changing the Regional Category Designation of their property from Semi-Rural to Village and Commercial designations. To build what the applicant proposes, it is necessary for the designation to change, but they have offered no compelling justification for the change. Such changes to the County's General Plan as well as the Valley Center Community Plan and the Bonsall Community Plan should be justified. The point of such plans is to guide development in a direction that is consistent with the community's desires and the communities' commitments to the County for growth. The present General Plan, Valley Center Community Plan, and Bonsall Community Plan were written to address the needs for anticipated future growth within the County and in particular Valley Center and Bonsall. The proposed Project is not needed to fulfill growth commitments in either community.

Development Standards and Regulations/Design Concept

The applicant's specific plan suggests that the Project will help support the area's reasonable share of projected population growth. However, that is a specious assertion given that Valley Center's reasonable share of growth is 905 dwelling units [only 755 more than the existing General Plan already provides] and more than that number have been accounted for in the plans for the north and south villages within Valley Center. There is no apparent need for the 1746 units being proposed by the applicant, especially as they are proposed for an area remote from community infrastructure.

Land Use Plan

The Land Use Plan shows some considerable changes based on the shifting acreages among the different types of land uses in the Project. However, the phase descriptions continue to be very conceptual rather than specific. The question continues to be: at what point will the specific plan become specific rather than merely suggestive, contingent or conceptual? There continues to be only one Tentative Implementing Map for phase one with the others for phases 2 through 5 not scheduled to appear for some length of time after approval of the Project. This is rather like buying a pig in a poke.

Distribution of Land Uses

Table 1 – Land Use Summary, shows that proposed public parkland in the Project decreased from 21 acres in a few public parks to 12 acres in a single public park since the previous iterations of the specific plan. And, private parkland increased from 4.4 to 13.8 acres in 14 small and pocket parks and a private recreation center. The County General Plan Conservation and Open Space Element established goals of 10 acres of local parkland and 15 acres of regional parkland per 1,000 persons. The little over 20 acres proposed for public and private parks falls well short of this goal. It seems the numbers are moving in the wrong direction. Further, larger parks would serve the Project better than the multitude of pocket parks described.

Town Center/Neighborhood Centers

The bed and breakfast of earlier specific plans has become a substantially sized, 50-bed Country Inn. Commercial Mixed-use square footage has been increased from 75,000 sq. ft. to 90,000 sq. ft. (see Table 1: 61,500 sq. ft.– Specialty Commercial; 28,500 sq. ft. Office). Rather than scaling back the Project for rural compatibility as the VCCPG has suggested in previous comments, the current specific plan is expanding and extending commercial and office areas. The language used to describe these ‘centers’ continues to be vague and loose and non-specific.

Residential Component

In the first two drafts of the specific plan, the applicant claimed an overall density of 2.9 du/ac, which is apparently the smallest applicable category the County recognizes for overall density [the calculation is 1746 du divided by 608 acres]. But, that density has been revised in the third draft, and reported to be an overall density of 2.36 du/ac [the result of dividing 1371 dwelling units on 582.2 acres]. However, that density yield seems specious. The 582.2 acres used in that calculation include open spaces, roads, parks and schools, areas that do not play much of a role in the perception of density. Oddly, the 582.2 acres does not include the areas with the C-34 designation or the 375 du that are a part of it.

Looking at the 375 dwelling units in the Project that occupy 23.8 acres in the C-34 zoned areas, reveals urban densities in excess of 13 du/ac and, of that total, nearly 8 ac would have an urban density in excess of 20 du/ac.

And those densities exclude the 200-bed assisted living facility that questionably doesn’t factor into the number of dwelling units.

As we noted in earlier comments, densities of this magnitude [13.8 du/ac and 20.75 du/ac and even the overall density of 2.9 du/ac] are more comparable to large urban centers than the rural, agricultural areas that surround the Project property.

Senior Citizen Neighborhood

Although not apparent to the applicant, the designation of 468 dwelling units for an age-restricted Senior Citizen Neighborhood with a 200-bed assisted living/care facility could present a significant problem for prospective residents of those units who may need emergency health care. Presently, emergency services cannot respond to the Project within the guidelines required for such service. In addition, the nearest hospital is about 17 miles distant. To have a neighborhood facility for such a potentially fragile population without emergency medical services close at hand may prove problematic and will likely add significantly to the volume of emergency service calls to the Deer Springs Fire Protection District.

Earlier versions of the Project's Specific Plan called for the 200-unit assisted living facility to provide a kitchen for each unit. That proposal would have run afoul of the definition of a dwelling unit and increased the density of the Project to 3.9 DU/a. However, even without the kitchens, these units are a density deception.

Parks

It should be noted that the County General Plan Conservation and Open Space Element established goals of 10 acres of local parkland and 15 acres of regional parkland per 1,000 persons [local parks include: mini parks or tot lots, neighborhood parks, community parks, school parks, and specialty parks, containing both active and passive park uses]. The Project proposes adding over 5000 new residents, which should generate 50 acres of local parks and 750 acres of regional parks. Neither goal is close to being achieved by this specific plan.

Open Space/Conservation Policies

The Project's conservation goal of sparing the most sensitive habitats on the property presents itself well on first hearing. However, as laudable as saving sensitive habitat is [and it is required], the Project will be excavating and mounding the remainder of the Project site [that's about 1.5 cubic yards of earth moved for every square yard of the Project property]. Further, the applicant has abandoned the notion of developing any off-site mitigation of sensitive habitat in the nearby MSCP PAMA. So, restoration of habitat could occur almost anywhere else but the Project site or its immediate neighborhood. This prospect is dismaying in that the destruction of habitat in Valley Center may lead to restoration of habitat elsewhere in the county without benefit to Valley Center. The applicant should be required to mitigate losses of biological resources as close to the Project site as possible.

Community Recreational Elements

The trails network is somewhat changed from previous versions of the specific plan, but the trail standards for the various types of trails continue to be an issue. The Project should be required to comply with the standards and guidelines set forth in the county's Community Trails Master Plan, including those applicable to the Valley Center Planning Area. Pathways and trails should be a minimum of 12 feet wide unless topographically impossible. The standards for the Project's 'public' trails allow the tread area to narrow to as little as 3 feet, an unacceptable width for new trails.

Circulation Goals & Policies/Street System

The circulation goals/policies have changed little from the previous version of the specific plan, except in one respect. There is apparently no further interest in integrating private road development in the Project's Specific Plan with existing land uses in the surrounding areas and the regional transportation network. This

appears to mean that the circulation system in the Project will be effectively closed except for the “Main St.” bypass to West Lilac Road. This has implications for the Special Area Regulation “D” designation site plan considerations.

Both figures 14 [Specific Plan Map] and 24 [Project Internal Circulation Map] show what is available of the internal road system, but continue to fail to show residential private roads in any of the residential phases. The maps are unclear about the connection of the two halves of the Lilac Hills Ranch Road in the vicinity of Covey Lane. The maps also show a residential private road arrow traversing over property outside the Project boundary with no explanation of right of way.

West Lilac Road forms much of the northern border of the Project and is a county mobility element road. The current specific plan changes the West Lilac Road Mobility Element Classification from a 2.2C light collector to a 2.2F light collector. It is unacceptable to make that change to accommodate the aims of the applicant to divert traffic through their commercial center along ‘Main St.’ without regard to the existing community. The 2.2C light collector classification provides better traffic flow and greater traffic capacity because it includes dedicated turn lanes. These are essential characteristics for a mobility element roadway. The 2.2F light collector classification has a reduced two-foot shoulder, a rolled curb with graded pathway and a narrow right of way. Figure 25 of the specific plan shows a street section for the proposed change to West Lilac Road with an 8-foot minimum meandering pathway alongside. However, the standard should be a 10-foot minimum pathway.

The same concerns generated by earlier versions of the specific plan regarding roads that are graded to the natural contours with minimal disturbance to the natural terrain continue in this version. The lack of rural compatibility and sensibility in this specific plan extends to the residential architectural standards as well as the roads.

On-site Water Reclamation Facility

There continues to be ambiguity concerning the water reclamation facility being proposed. The specific plan states that Valley Center Municipal Water District will direct trucking of wastewater to an off-site treatment facility for the initial development [presumably phase one], and that wastewater from up to 100 dwelling units may be trucked off-site on a regular basis. However, phase one consists of 350 units, which may necessitate additional trucking of wastewater over narrow twisting roads.

The Project will not build a wastewater treatment plant during the initial phase of development, but, it is not clear from the specific plan when the facility is to be built. The current version of the specific plan has reverted to an earlier proposal of collecting and trucking the effluent to an off-site facility for treatment, making it unavailable for irrigation. This procedure will add numerous daily trips to and

from the Project, trips that could go on for a lengthy but undetermined period. The last proposal was to construct a temporary 26,000-foot [5 miles] four –inch force main sewer line where effluent would be pumped from a temporary pumping station. While the current specific plan mentions treating the trucked effluent, it does not mention if the reclaimed water would be transported back to the Project, which would double the daily trips to and from the Project.

The specific plan has not defined the proposed Project’s wastewater management system beyond a platitudinous discussion of top-level options. But, it does appear that a wastewater reclamation plant for recycling of wastewater is proposed on-site to the Project.

In what location will sewage treatment occur with a process description of the level of treatment and methodology for disposal of residual solids including long-term agreements if other agencies are involved in solid waste handling?

Services and Infrastructure (Water, Schools)

The applicant asserts that it is “looking at” four sources of water to meet the Projects needs in addition to Valley Center Municipal Water District [VCMWD] water, including “ground water, rain water harvesting, grey water and reclaimed water.” Apart from the existing water wells on-site for ground water, which will be subject to VCMWD guidelines, the applicant is vague about the other sources and specifically how they will be employed. The applicant says cisterns and roof collection systems are “allowed” on single-family dwellings, but does not commit to employing them. Grey water systems are an “allowed use”, but there is no commitment to employ them. And, the applicant suggests that recycled water will be obtained from the VCMWD, although the VCMWD has no off-site easements for recycled water from its Lower Moosa Canyon treatment plant. This is all too fuzzy for a Specific Plan.

The issue of which school districts will be serving the proposed Project continues to be unresolved. The latest Specific Plan proposes a twelve-acre site for a K-8 school, but there is no Project Availability Form from Valley Center-Pauma Unified School District, or Bonsall Union School District agreeing to manage the school. Further, the applicant has excluded the Fallbrook Union High School District from their current specific plan even though the Project is still partially within that district and potentially will be served by that district [Bonsall is still going through the process of unification]. The issues of school location and school district choice matter because it fundamentally affects the Project’s required traffic study. Are students to go to school in Valley Center and be bussed or driven over that set of highly impacted roads or are they to go to

school in Bonsall or Fallbrook and be transported that way? Where traffic will be directed affects where roads will be impacted and need improvement.

Neither Bonsall nor Valley Center has presently indicated a willingness to manage an additional school. How, then, are the community or other decision makers to know which roads will be impacted and by how many children (will we need to consider K-12 or just high school students) or how to evaluate the data provided in the traffic study?

Sign Plan

The Project's sign plan should incorporate standards already in place in the Valley Center Design Review Board's guidelines. A single standard should be in use throughout Valley Center.

Sustainable Community Design

The applicant cites General Plan Guiding Principles #2 & #9, but fails interpret them correctly or to provide the context of the other eight guiding principles.

Guiding Principle #1 states, "Support a reasonable share of projected regional population growth. The Community Plans of Bonsall and Valley Center, which are integral to the County's General Plan, already provide for their share of the projected growth well into the future, without the Project.

Guiding Principle #2, already stated in the Specific Plan, is meant to bear on the entire community of Valley Center, not merely within the boundaries of the Project. This Project, as proposed, is isolated in an area designated for large parcel agriculture in contradiction to this guiding principle. Rather than concentrating density at the center of Valley Center as the General Plan does, this Project will hopscotch density into an area where it is not intended, defeating this principle.

Guiding Principle #3, which states, "Reinforce the vitality, local economy, and individual character of existing communities when planning new housing, employment, and recreational opportunities." The proposed Project does not reinforce the existing community, but instead divides the community by attempting to establish a competing town center.

Guiding Principle #4 states, "Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance." This Project will remove natural and agricultural habitat from the swiftly diminishing inventory in San Diego County.

Guiding Principle #5 states, "Ensure that development accounts for physical constraints and the natural hazards of the land." This project is proposing to cut and fill nearly four and half million cubic yards of earth and rock to support the development of buildings and infrastructure. There is no recognition of, nor deference to, the hilly and sometimes steep, topography of the site.

Guiding Principle #6 states, "Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns and, when appropriate, plan for development which supports public transportation." While the Project does have a system of trails and roads, most of

these are private and internal to the Project with only very limited connection to the existing public trails and roads of the Valley Center community.

Guiding Principle #7 states, "Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change." The Project's Traffic Study strains unsuccessfully to make the greenhouse gas emissions generated by the Project to fit into the standard established by the State of California.

Guiding Principle #8 states, "Preserve agriculture as an integral component of the region's economy, character, and open space network." This Project destroys agricultural lands and urbanizes them. The claims that the Project will preserve certain remnants of orchards is more of a nod to a landscaping theme than a serious interest in preserving agriculture.

Guiding Principle #10 states, "Recognize community and stakeholder interests while striving for consensus." There has been minimal exchange between the applicant and the Valley Center community on this Project, despite numerous public planning group and subcommittee meetings devoted in whole or in part to this project. On all the previous versions of the Specific Plan for this Project, very little concession has been made to the concerns of the elected officials representing Valley Center. So-called "public meetings" organized by the applicant have been by invitation only and only invited a very thin segment of the Valley Center community.

The General Plan requires Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND) certification or equivalent in order to mitigate the type of leap-frog development this Project represents. The prerequisite for such certification requires that site location and linkage be done on brown fields or infill sites, not green field, rural or agricultural sites. While the applicant may eventually build houses and buildings with LEED-ND building standards, they fail to meet the prerequisite of good site selection. The applicant continues to tout the Project's town center as consistent with the Community Development Model, ignoring the surrounding community of Valley Center and its consistency with the Community Development Model and General Plan.

Development Standards and Regulations: On/Off-site Circulation Plan.

Changing a portion of West Lilac Road along the northern boundary of the Project, a public road, from a 2.2C to a 2.2F light collector will impede traffic on the mobility element system in Valley Center unnecessarily. The 2.2C design is necessary at General Plan build-out and should not be waived for the convenience of the applicant. It is a crucial element of the Community Evacuation Route Study [CERS] plan for emergency evacuations. We have noted the poor interconnection of the Project's roads, both public and private, and have commented separately on the road standard modification requests made by the applicant, all of which provide economic benefit to the applicant and reduced design speed and safety to the public.

The Project internal circulation map [fig. 24 and others] indicate an IOD [irrevocable offer to dedicate] at the northern end of the Project from the project entrance on

West Lilac Road easterly to the boundary of the Community Plan Areas. This IOD, if exercised, would transit an open space, taking a substantial swath of the space and rendering it even less effective for its biological purpose. This IOD would also complicate the local circulation of traffic in non-project areas.

The Rights-of-way, or street lots, for the Main Street have been reduced in width since earlier versions of the Specific Plan. What is the explanation for this reduction, especially given that the trend in road development seems to be to widen rights-of-way to more easily accommodate wider travel lanes, bike lanes, trails, medians and shoulders?

Figure 24 shows an internal private road that exits the Project boundary at approximately the western end of Covey Lane and transits, in a westerly direction, property that is not a part of the Project before re-entering the Project boundary. Does the applicant have development rights satisfactory to the County to build that road?

Development Standards and Regulations: F. Fire Protection Plan

The Fire Protection Plan [FPP] presented in figure 137 does not show the “minimum two legal alternative evacuation routes” as suggested in the FPP standards discussion. Further, the Specific Plan and the FPP propose to leave the development of the “Emergency Evacuation Routes and Procedures for all of the property-owners and residents within” the Project to the HOA. So, the “plan” is to not have a plan until the HOA is formed and functioning. This “plan” avoids the searing question of ascertaining the availability of evacuation routes until after the project is approved. This is not a plan at all, it is an evasion.

Development Standards and Regulations: O. Existing Structures to Remain

The sixteen parcels with existing structures should be included in the 1746 dwelling unit total. Even if they are eventually demolished, likely they will be replaced with other dwellings and therefore should be a part of the 1746. Many other features of the property predate the Specific Plan but are not being allowed to remain. These structures should be no different than the ones being built.

Implementation. E. Public Facilities Finance Plan. 9. Finance Plan

This “plan” is no more than a description of options. There is nothing specific about it. It is merely a list of recommendations.

Conclusion

Surely, the Project tramples far too much of the General Plan and the Community Plans to be approved. The County should instruct the applicant to revisit those plans and conform the Project to them. The applicant’s General Plan Amendment and Specific Plan—which deviates so greatly from existing planning law—could, if approved, set a new precedent in San Diego County land use policy that overrides

the intent of the newly minted General Plan and severely diminishes the authority of the community plans. The applicant must provide the VCCPG more of the specific, detailed information about the Project that is consistent with the requirements of State mandated Specific Plans so we can make a more reasoned evaluation. Much of what we have been presented so far is suggestive, contingent or conceptual with no intent to commit to a specific plan.

Too few of the substantive issues requiring resolution identified in either the October 22, 2012 Valley Center Community Planning Group comments, the December 10, 2012 Planning and Development Services letter to the applicant, or the March 11, 2013 Valley Center Community Planning Group comments, have been adequately addressed.

Those of us who have read iteration after iteration of the Project's Specific Plan are mystified. We are interested to see a project that conforms to the existing General Plan and the Valley Center and Bonsall Community Plans. We don't think that this Project, that will brutalize 608-acres of agriculture and open space with urban development, is a good fit with either Bonsall or Valley Center. We want the Project to show respect for the General Plan and its principles. We want a project that will not destroy Valley Center, the lives of our neighbors and the entire planning process in the County.

Table 1, below, is a list of agricultural operations in the Lilac Triangle including the Project site. The location numbers can be found on Figure 1, below.

Location	Agricultural Product	Owner/Business Name
1	Cactus	Britsch - Western Cactus
2	Avocados	Purdy
3	Lemons/Avocados	Covey Farms
4	Avocados	Accretive
5	Figs	Padilla Guadalupe
6	Cactus	Richard Thompson
7	Avocados	Accretive
8	JR Organic Farms (Produce)	Accretive
9	Flowers	
10	Avocados	
11	Proteas	Accretive
12	Worm Castings	
13	Flowers	LaChapelle
14	Avocados & Palms	
15	Wholesale Nursery & Green Houses	
16	Flowers	
17	Avocados	
18	Cactus	Far West
19	Cactus & greenhouses	Altman Plants
20	Avocado Groves (very large grove)	
21	Avocados & citrus	
22	Avocados (Calavo growers)	
23	Avocados	
24	Cactus & succulents	
25	Tropical Plants	Ben's Subtropicals
26	Proteas & Eucalyptus	
27	Greenhouse - succulents	
28	Flowers	
29	Avocados & citrus	
30	Organic Produce & Hydraionic G.H.	Archies Acres Farms
31	avocado	
32	palms (shade cloth greenhouses	
33	avocado/citrus	
34	citrus	
35	king palms	
36	avocados	
37	avocados	
38	succulents & green houses	
39	tangerines	
40	avocados	
41	citrus	
42	avocados	
43	avocados	
44	flowers	

45	JR Organic Farms (Produce)	
46	greenhouses	
47	avocado, citrus & flowers	
48	avocados	
49	avocados & kiwis	
50	avocados	
51	avocados	
52	avocados	
53	produce	
54	flowers	
55	avocados	
56	flowers	
57	produce	
58	avocados	
59	avocados	
60	avocados	Kamp Kuper Youth Retreat Ctr.
61	avocados	
62	pomegranates/avocados	
63	cactus/green houses	
64	Avocados/pomegranates/ loquats	
65	avocados	
66	avocados	
67	pomegranates	
68	palm nursery	
69	avocados	
70	avocados	
71	Wholesale Nursery	
72	Palm Nursery	
73	Eucalyptus	
74	avocados	
75	avocados	
76	avocados	
77	palm nursery	
78	green houses	Euro American
79	avocados	
80	avocados	
81	avocados	
82	avocados	
83	palm/cactus/ornamentals	Poncianos nursery
84	avocados	
85	avocados	
86	avocados	
87	avocados	
88	avocados	
89	avocados	
90	avocados	
91	avocados	
92	avocados	

93	quarry (rocks)	
94	avocados	
95	palm nursery	
96	orchids	Reids Orchids
97	flowers	
98	citrus	
99	citrus	
100	avocados	
101	Sunnataran Residence	Retreat

