

# Valley Center Community Planning Group

## Minutes of the July 14, 2014 Meeting

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

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

A=Absent/Abstain BOS=Board of Supervisors PDS=Department of Planning & Development Services DPW=Department of Public Works DRB=Valley Center Design Review Board N=Nay P=Present R=Recuse SC=Subcommittee TBD=To Be Determined VCCPG=Valley Center Community Planning Group Y=Yea

Forwarded to Members: 18 July 2014

Approved: 21 July 2014

<b>A</b>		<b>Call to Order and Roll Call by Seat #:</b>									7:02 PM				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
M I L L E R	H U T C H I S O N		G L A V I N I C	B R I T S C H	F R A N C K	Q U I N L E Y	V I C K	B O U L O S	N O R W O O D	S M I T H	J A C K S O N	R U D O L F		L A V E N T U R E	
P	P		P	P	P	P	A	P	P	A	P	P		P	

**Notes: Quinley presides in Smith's absence; Britsch Arrives 7.04 pm; Boulos arrives 7.20 pm**

**Quorum Established: present 9**

**B Pledge of Allegiance**

**C Approval of Minutes:**

**Motion:** Move to approve the minutes of June 9, 2014 as corrected

**Maker/Second:** Rudolf/Laventure

**Carries/Fails 10-0-0 (Y-N-A):** Voice

**D Public Communication/Open Forum:**

None

**E Action Items [VCCPG advisory vote may be taken on the following items]:**

**E1**

**Discussion and vote on McGuire Game/Hobby Room; PDS2014-AD-14-006; Owner is Dave McGuire who lives at 31121 Stardust Land; Engineer is Lovelace Engineering at 858-535-9111 or cturner@lovelaceeng.com ; contact person is Doug Petersen at 619-274-7525 or doug@idasd.com. Location of project is 31121 Stardust Land at Hillsdale Road. Applicant proposes the construction of a 24 X 48 foot two story game/hobby structure not attached to the main house. (Boulos)**

**Discussion:** Boulos presents. She says the conditions placed on the project by the County have been satisfied. Hutchison reads the previous motion from the March 2014 minutes, to illuminate the conditions for development for the planning group, having failed to forward those minutes to Boulos earlier to benefit her presentation. Glavinic suggests that if the project is now synchronized with the conditions and requirements, there is no need to hear the project again. Boulos agrees that all the conditions have been met. Glavinic asks how to avoid repeated review of items such as this in the future.

**Motion:** Move to approve the project on the basis of the County's scoping letter, noting that all conditions for approval have been satisfied.

**Maker/Second:** Boulos/Laventure

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

**E2**

**Continuation of Discussion and possible vote on Wilkes Solar Project; PDS 2014-AD-14-030; PDA 2014-ER 14-08-007; Application for an Environmental Initial Study (AEIS) for solar installation at 29660 Wilkes Rd. and Mystery Mountain Road. Owner is Phyllis Mabbett, Trustee, Mabbett Family Trust at 760-533-8716 or drphyllism@aol.com;**

	<p><b>Applicant is Desmond Power Products, LLC at 760-533-8714 or drarlenb@desmon-us.com; Contact person is Shane Arlen Barksdale at 760-533-8714 or draleny@desmon-us.com; Project is a 10 acre; 1.9 MWde, export electrical system on a 16.97 acre lot. (Smith or Hutchison)</b></p>	
<p><b>Discussion:</b> Hutchison presents. He provides his impression of the extensive County scoping letter that cited extensive grading on-site without permit, multiple occupied trailers, hazardous materials issues, and multiple land use issues. Hutchison offers a motion to recommend rejection of the project. Rudolf suggests a friendly amendment to the original motion, noting that a recommendation to reject the project now could be construed as VCCPG's "one bite of the apple" in terms of review. He adds that we may want further review if the applicant satisfies the lengthy list of code violations that have interrupted the approval process of the project. Hutchison acknowledges the wisdom of Rudolf's advice and agrees to the amendment.</p> <p>Bob Vice, neighbor to the project, says his involvement with the project began when he noticed considerable tractor work being done to accomplish the grading. Vice thinks the work stopped because of notification of a code violation. He noted the County's lack of notification of the project application to nearby residents. He then describes his interaction with the Solar Subcommittee on this project. Julie Walker, resident/neighbor, asks about the approval process going forward; Hutchison clarifies. Mike DeAnda, resident, says Barksdale removed what amounted to a hill and without a permit. Ms Myer, resident, thanks VCCPG for their efforts, and suggests Barksdale's character is questionable given the information that has come out as a result of the scoping letter. Shawn Heaton, resident, adds his concerns re the scoping letter. Airline pilot and resident of Blackington field, Pete Gorman, cites glare from the solar panels as an issue and adds that the glare from the tracking solar panel arrays will be a greater issue than if they are fixed, since the likelihood of glare in the flight path can happen at more times during the day. He has recent experience with glare in the same area off a car windshield. Josette Franck, referencing her own experience says the amount of electricity needed for agricultural irrigation is small compared to use forecast by the applicant. Britsch says the glare is biggest issue. The nearness to the airport and the potential impact on aircraft navigation is a more important issue than some others already reported.</p>		
<p><b>Motion: Move to continue this item until all code violations are resolved and it can be brought back to the VCCPG for review</b></p>		
<p><b>Maker/Second:</b> Hutchison/Norwood</p>		<p><b>Carries/Fails:</b> 11-0-0 [Y-N-A] Voice</p>
<p><b>E3</b></p>	<p><b>Discussion and possible vote on County's draft proposal to improve SR 76 and Valley Center Road intersection. (Jackson)</b></p>	
<p><b>Discussion:</b> Jackson presents a draft letter to respond to the plan by the County to improve the intersection of State Route 76 and Valley Center Road. The letter acknowledges and agrees with the negative declaration for the project and makes suggestions for additional features relative to a more rural design that comports with the road's status as a scenic highway and the need for a runaway truck ramp to the east of the intersection on SR 76. Glavinic says he disagrees with the presentation of a negative declaration when there are the two issues of truck safety and scenic highway considerations. He discusses two additional suggestions. He then adds the issue of additional safety signage. He suggests deletion of a few lines of the letter would satisfy him and he could then support the draft letter. Jackson agrees to the amendment.</p>		
<p><b>Motion: Move to submit the proposed draft letter [attached] to the County [as amended by deleting the first sentence].</b></p>		
<p><b>Maker/Second:</b> Jackson/Rudolf</p>		<p><b>Carries/Fails:</b> 11-0-0 [Y-N-A]</p>
<p><b>E4</b></p>	<p><b>Update on DEIR resubmittal for Lilac Hills Ranch (Accretive) project and discussion and vote on transmittal letter for earlier comments on PDS2012-3800-12-001 (GPA), SP12-001. Lilac Hills Ranch is a master planned community of 608 acres and 1,746</b></p>	

	<p>residences, 90,000 square feet of commercial office and retail space; a 50 room Country Inn; a 200 bed care assisted living facility and civic facilities that include public and private parks, a private recreational facility, other recreational amenities, and, the developer proposes, other public facilities including a fire station and a school. The project is located east of I-15 and south and west of West Lilac Road one half mile north of Circle R Drive. (Hutchison)</p>
<p><b>Discussion:</b> Hutchison reviews the status of the project and the desire of the Lilac Hills Ranch [LHR] SC to have a cover letter approved by the VCCPG for the purpose of resubmitting the comments for the Draft Environmental Impact Report [DEIR] of August 2013. He explains that the strategy of the SC is to make sure all the comments from last year's effort receive a response. He notes that the changes to the DEIR presented in the Revised DEIR of June 2014 will also be addressed in a subsequent submission. Quinley advises the planning group that review would have to take place likely on Monday, 21 July in an additional meeting. Glavinic asks about the probably of a quorum for the RDEIR comment review. Glavinic asks about the process of review. Jack Fox, audience, cites the need to form comments in question form to ensure a response from County staff. He says Kristin Blackson, PDS staff, suggested using the process of eminent domain to acquire access to Mountain Ridge Rd. for a fire station. Fox questions the credibility of the staff being neutral. Hutchison notes that the letter distributed for review was missing an amendment added in SC. The amended letter is distributed.</p>	
<p><b>Motion:</b> Move to forward the amended letter recommended by the LHR SC along with the filings of August 2013 [attached]</p>	
<p><b>Maker/Second:</b> Hutchison/Rudolf</p>	<p><b>Carries/Fails 9-0-2 [Y-N-A]:</b> Britsch/Jackson recuse</p>
<p><b>Notes:</b> Britsch and Jackson recuse because of the proximity of their properties to the project.</p>	
<p><b>E5</b></p>	<p><b>Discussion and vote on creation of a subcommittee to review and make recommendations on a "Sunset Review" for the VCCPG prior to November 18, 2014. The Board of Supervisors Policy A-74 requires that each year one fourth of all advisory committees conduct such a review. The VCCPG will review its establishing ordinance, policy or resolution, develop recommendations for continuance, deletion or revision and provide a written report to the Clerk of the Board of Supervisors by November 18, 2014. (Rudolph and Ad Hoc subcommittee).</b></p>
<p><b>Discussion:</b> Rudolf is unclear on the charge from County. Quinley provides additional information in the form of a letter. Rudolf explains the need to review the VCCPG's establishing documents from time to time. He questions whether the review includes the local rules for Valley Center's planning group. He says the review should be straight forward if it doesn't include the local rules. Quinley says Smith might be available for inclusion on the subcommittee. There are no other volunteers. He will report with a recommendation at the September meeting. Glavinic suggests a third party review of Rudolf's work by one or more members of VCCPG before the vote in September.</p>	
<p><b>Motion: none</b></p>	
<p><b>E6</b></p>	<p><b>1) Discussion and vote on Valley Center-Pauma Unified School District Sport Field Project updated, recirculated Draft EIR. Comments must be received by July 23, 2014. The project proposes a multi-use turf sports field in the southeastern quadrant of Cole Grade Road and Valley Center School Road on a 1.9 acre site owned by the school district. It is a flat, vacant, previously developed land. Portable and moveable benches and/or bleachers would be used for participants and spectators. The sports field would be fenced and would be used during daylight hours and not lighted. (Rudolf)</b></p>
<p><b>Discussion:</b> Rudolf presents. He notes the distribution of a previous letter from the VCCPG and explains that the lack of response from the Valley Center Pauma Unified School District is leading to the current letter. He says the lack of discussion about the Civilian Conservation Corps buildings in the Draft Environmental Impact</p>	

Report makes that document incomplete. Rudolf explains his letter. Norwood asks what is the goal of the response. Rudolf explains the need to address the former buildings as being the existing condition at the crux of the DEIR. Norwood asks if the DEIR is still available for review. She says 5 years ago the state offered that the property was offered to Valley Center Parks and Recreation Dept, but it was turned down because they didn't think they could afford to maintain it. Glavinic says we should have more information on the pending lawsuit. Dorothy Kennedy, audience, doesn't understand why Vick is objecting to the decision by VCPUSD to demolish the buildings to build a playing field. She says the lawsuit should not have any bearing on this motion. Rudolf tries to explain there is no connection between the letter under consideration and lawsuit concerning the property.

**Motion:** Move to approve the letter to the VCPUSD re the draft EIR [attached]

<b>Maker/Second:</b> Rudolf/Hutchison	<b>Carries/Fails:</b> 9-2-0 [Y-N-A]: Voice: Glavinic/Norwood dissent
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<b>F</b>	<b>Group Business</b>
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<b>F1</b>	<b>1) Vote on candidates for seats # 3 and # 14 on the Valley Center Community Planning Group. The two candidates who are selected will be recommended to the Board of Supervisors for appointment to the VCCPG. (Britsch).</b>
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**Discussion:** Britsch presents, naming the candidates: Susan Janisch, Mark Costa, Susan Fajardo, and Boris Dobrotin. Jackson asks about seat terms. Britsch explains seat #3 term expires January 2017 and seat #14 term expires January 2015. Britsch thanks the candidates for their willingness to serve. Jackson notes an opportunity to serve on SCs, and he encourages the participation of those candidates not elected. Britsch asks if members have any additional questions for the candidates. Quinley asks Costa if he has land use or planning experience; he replies no, not in land use. Tom Bumgardner, audience, asks why we don't have alternates so vacancies can be filled more quickly when they occur. Rudolf explains that such a provision is not in the VCCPG's establishing documents. Glavinic notes that those not elected can be the first candidates for a future vacancy. Voting was done first for Seat #3 with members declaring their choice from among all the candidates. Susan Janisch received 8 of the 11 votes on the first round for Seat #3. Susan Fajardo was then unanimously elected in the third round for Seat #14.

**Election Results:** Susan Janisch, elected to Seat # 3; Susan Fajardo, elected to Seat # 14

**Notes:** Glavinic declares his resignation from the Solar SC

<b>F2</b>	<b>1) Discussion and vote on setting date for an extra meeting to review and vote on the recommendations from the Lilac Hills Ranch sub-committee concerning the re-circulated DEIR and Specific Plan. (Hutchison)</b>
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**Discussion:** Quinley describes the need for an additional meeting to address the recommendation of comments on the Lilac Hills Ranch project, probably on 21 July. Glavinic asks if it is possible to get a quorum of members on that date given the usual summer absences. Quinley polls the members for quorum to see if a quorum is possible. She reiterates her proposal for 21 July as the meeting date. Then suggests that if more time is needed to complete the comments, an alternative date could be Wednesday 23 July 2014. It is agreed that both dates would be investigated for availability of a meeting place and an email notice would be sent with the result.

**Motion:** none

**Britsch/Jackson recuse from discussion because of proximity of their properties to project.**

<b>F3</b>	<b>1) Welcome to Bill Miller who has been approved/ appointed to a seat on the Valley Center Community Planning Group. (Quinley)</b>
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**Discussion:** Ann Quinley welcomes Bill Miller. VCCPG members join in welcoming Bill Miller to the planning

group.		
<b>F4</b>	<b>Next regular meeting scheduled for August 11, 2014</b>	
<b>G</b>	<b>Motion to Adjourn:</b>	<b>8.43pm</b>
	<b>Maker/Second: Quinley/Hutchison</b>	<b>Carries/Fails: 11-0-0 [Y-N-A]</b>
<b>Subcommittees of the Valley Center Community Planning Group</b>		
a)	Mobility – Mark Jackson	
b)	Community Plan Update – Richard Rudolf, Chair	
c)	Nominations – Hans Britsch, Chair	
d)	Northern Village – Ann Quinley, Chair	
e)	Parks & Recreation –LaVonne Norwood Johnson, Chair	
f)	Southern Village – Jon Vick, Chair	
g)	Tribal Liaison – Larry Glavinic, Chair	
h)	Website – Oliver Smith, Chair	
i)	Lilac Hills Ranch – Steve Hutchison, Chair	
j)	Solar – Oliver Smith, Chair	

**Correspondence Received for the Meeting:**

- 1) DPDS to VCCPG- PDS2012-3800-12-001 (GPA), SP12-001. Lilac Hills Ranch is a master planned community of 608 acres and 1,746 residences, 90,000 square feet of commercial office and retail space; a 50 room Country Inn; a 200 bed care assisted living facility and civic facilities that include public and private parks, a private recreational facility, other recreational amenities, and, the developer proposes, other public facilities including a fire station and a school. The project is located east of I-15 and south and west of West Lilac Road one half mile north of Circle R Drive. (Hutchinson)
- 2) Department of Transportation, District 11 to VCCPG; Notice of Draft Initial Study/ Environmental Assessment, and Notice of Public Hearing on potential environmental impacts of the proposed State Route 76 (SR 76) and Valley Center Road Intersection Improvement Project. The project is available for comments until July 7, 2014. The project would perform safety improvements to the SR 76/Valley Center Road intersection and realign curves adjacent to the juncture, install sidewalks and two bus pullouts and install either a roundabout or a traffic signal at the intersection. (Jackson)
- 3) Valley Center-Pauma Unified School District Sport Field Project recirculated Draft EIR is being recirculated for comments which must be received by July 23, 2014. The project proposes development of a multi-use turf sports field in the southeastern quadrant of Cole Grade Road and Valley Center School Road on a 1.9 acre site owned by the school district. It is a flat, vacant, previously developed land. Portable and moveable benches and/or bleachers would be used for participants and spectators. The sports field would be fenced and would be used during daylight hours and not lighted. (Rudolf)
- 4) Road Runner to VCCPG-proof of publication for Agenda of June 9, 2014.
- 5) DPDS to VCCPG; Public Notice of intent to adopt Findings under the Environmental Quality Act. Project: Nelson Grading Plan (L-Grade) PDS2008-15413-15413. The project is a major grading plan to create two pads. The project site is located south of Valley Center Road at the Valley Center Road and Miller Road intersection. Access to the site would be provided by a driveway connection to Valley Center Road. Earthwork will consist of a cut of 9 cubic yards, fill of 62,018 cubic yards and import of 62,009 cubic yards of material. The project is consistent with lot size requirements of the General Plan and Zoning Ordinance. DPDS Planner is Emmet Aquino at 6948845 or emmet.Aquino@SDcounty.ca.gov. (Quinley)
- 6) Comments from George Lucia, Valley Center Fire Marshall, on ideas for policies to reduce fire hazards on properties proposed for development that have previously been agricultural. County is preparing a response to Mr. Lucia's comments.

**Attached Items:**

**Item E3:**

# Valley Center Community Planning Group

PO Box 127 Valley Center CA 92082



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Chair

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**Jeana Boulos**

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**Eric Laventure**

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**Bill Miller**

**LaVonne Norwood**

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**(Two positions pending)**

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5510 Overland Ave, Suite 310  
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July 14, 2014

CC: Allie Scrivener  
Division of Environmental Analysis  
California Department of Transportation  
4050 Taylor Street, MS 242  
San Diego, CA 92110 [alliescrivener@dot.ca.gov](mailto:alliescrivener@dot.ca.gov)  
Kenton Jones, DPW [Kenton.Jones@sdcounty.ca.gov](mailto:Kenton.Jones@sdcounty.ca.gov)  
Andy Mathews, Pala/Pauma Sponsor Group [Mathews.charles@gmail.com](mailto:Mathews.charles@gmail.com)

**RE: Comments on Mitigated Negative Declaration - Intersection Improvement and Curve Realignment at State Route 76 and Valley Center Road**

Todd,

The Valley Center Community Planning Group (VCCPG) finds two additional Impacts that we request that CALTRANS address. The two areas are Viewscape and Intersection Safety. We have also commented on the Intersection Design Alternatives.

## **Viewscape**

Highway 76 is designated a Scenic Highway, and the proposed intersection should have a viewscape that maintains the scenic rural nature of the location. We feel that concrete sidewalks, for example, are urban design features out of place in this rural setting. For hardscape features (curbs, gutters, sidewalks, etc.) we suggest the Zone 3 semi-rural and rural category described in the Valley Center Community Rights of Way Development Standards established by the County of San Diego [http://www.sdcounty.ca.gov/dpw/land/landpdf/communitystds/VCCRDS\\_Adopted\\_9282011.pdf](http://www.sdcounty.ca.gov/dpw/land/landpdf/communitystds/VCCRDS_Adopted_9282011.pdf). This document describes appropriate right of way hardscape and landscape design guidance that should be followed to achieve the goal of maintaining the Scenic Highway character of Highway 76 at this location.

## **Intersection Safety**

Our members drive this road frequently. We are concerned about heavy trucks travelling westbound (downhill) on Highway 76, which is a steep downhill grade.

The VCCPG Mobility Subcommittee requests that Caltrans consider a runaway truck emergency stopping lane for runaway trucks if design considerations or accident history indicate a need.

**Comment on the two Intersection Alternates**

Caltrans has determined that a modification to the intersection will improve safety and sight distance and reduce the number of accidents. VCCPG Mobility Subcommittee believes that Caltrans should select the alternative that traffic safety data has shown will best accomplish these goals as well as improve current level of service and travel times through the intersection.

Sincerely,

Oliver J. Smith  
Chair, Valley Center Community Planning Group  
Oliver.smith@philips.com  
(760) 703-1455

**Item E4:**

July 14, 2014

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

**Subject:** Revised DEIR Public Comments Regarding (*Subject Area*) with regard to the Proposed Accretive Lilac Hills Ranch General Plan Amendment and Specific Plan PDS2012-3800-12-001(GPA), PDS2012-3810-12-001 (SP).

Dear Mr. Slovick:

Attached re the August, 2013 Public Comments from the Valley Center Community Planning Group covering the following topics:

- General Plan Inconsistency
- Hazards and Hazardous Material
- Project Objectives
- Project Alternatives
- Public Services
- Waste Water
- Biological Resources
- Cultural Resources
- Executive Summary

- Irreversible Impacts
- Geology
- Lilac Hills Ranch Specific Plan

The REIR either did not directly respond to each of the items or failed to adequately respond to the issues raised in these letters and their Attachments.

For example, the County failed to address comments on the inappropriate and inaccurate use of the Community Development Model cited in our General Plan Consistency comments. The Hazards comments related to the Fire Protection Plan and the Evacuation Plan are not completely or adequately addressed. The County failed to adequately explain the self-serving and simplistic Project Objectives and address our related comments. The County rejected a proposed alternative project with very little explanation relative to CEQA § 15126.6 requirements allowing consideration of project alternatives at another location. The County did not respond to the rejection of fire service options proposed by the applicant as commented in our public services comments. The County failed to address the feasibility of the wastewater alternatives and growth-inducing impacts cited by our comments; and failed to address the phasing of the wastewater alternatives. The County has not addressed the issue of justifying the significance or insignificance of listed species populations with data for both regional and local [Project] populations in our Biological comments. The County has inadequately responded to comments in the Executive Summary regarding consistency with the General Plan. The County inadequately addresses our comments on the scope of change required in the General Plan and the Valley Center Community Plan in order to approve this Project.

Published County policies and specific assurances from the County staff [particularly the County's project manager, Mr. Slovick] have clearly stated that all August 2013 DEIR comments, if resubmitted, will be responded to.

Please respond to each specific issue raised in these documents as part of the County's Response to Public Comments.

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Sincerely,

Attachments

**Item E6:**

# Valley Center Community Planning Group

PO Box 127 Valley Center CA 92082



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**(Two positions pending)**

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July 14, 2014

Cc: Julie Macy Kimball, Chief Business Officer, VCPUSD [Kimball.ju@vcpusd.org](mailto:Kimball.ju@vcpusd.org)

Todd,

Following are the comments of the Valley Center Community Planning Group (VCCPG) on the VCPUS District's June 9, 2014 Recirculated Draft EIR for Sports Fields at School Lane. We again point out that the VCCPG sent the District a letter on March 13, 2013, urging the District to work with the community to support some type of historic recognition at the site, regardless of the ultimate use for the site. We note, regretfully, that District Board and Superintendent have refused to do so.

We also note that neither the previously circulated version of the DEIR county comments, nor the VCCPG comments through the county, have been included in the record. These comments should be included in the record.

This letter also constitutes a "cover letter" requesting response to the VCCPG's previous comments dated March 11, 2014 via Todd Snyder, county DPS, because they were not addressed, particularly the unique historical value of the destroyed building that should be part of the "Project Description" and analysis and the county's status as a "Responsible Agency."

The County's new General Plan establishes a local park goal for Valley Center of 10-acres per thousand population.<sup>1</sup> This results in approximately 360-acres of parkland at the planned 36,000 population at build-out. Valley Center currently has approximately 27-acres of parkland. Our community could use additional active and passive park use facilities.

- 1) Project objectives, baseline, background, description, areas of controversy, and alternatives

These portions of the Recirculated DEIR are all still fundamentally flawed, and thereby skew all of the analysis that follows. They neglect to deal with the CEQA-required "Whole of the Project," which includes the prior destruction of the historic buildings on the site, without any environmental analysis. It is easy to conclude there are no environmental impacts, when you don't include destruction of the most important part of the Project as part of the Project.

The Notice of Preparation of EIR dated September 18, 2013 includes (in Figure 2) an aerial photo correctly showing the buildings intact.

Since the DEIR Notice includes the site prior to demolition, the baseline data of the DEIR should be prior to demolition, not 6 months afterwards.

The new sketch (Fig. 3-1) and description of the proposed sports fields (previously entirely absent) present no justification for covering the entire site with the proposed field, and no articulation of how the parking and toilet facilities will be available to the public. This prevents the reader from determining whether any of the analysis is accurate. The location of the alternative sites is set up to not satisfy the arbitrarily narrow Project Objectives, and thus require rejection, rather than analysis, preventing the reader from determining if a 1.9-acre portion of some other District-owned parcel could equally well serve properly stated project objectives. The project objectives are duplicative, overlapping, and so narrowly written that they can only be satisfied by the proposed Project. Those objectives, of course, lead to a self-serving and biased environmental analysis.

Although the previous destruction of the historic buildings is listed as an "area of controversy," it still is not responded to in any meaningful way except to say that they were destroyed. There still is no discussion and analysis of CEQA's whole of the project/no project-splitting fundamental basis, and how or why destruction is not part of the Project. The new lengthy discussion of the sites' historic uses ignores evidence and comments submitted by recognized historic preservation groups, straining mightily to characterize the former CCC camp as an unimportant abandoned fire-fighting facility. Responses to the Comments previously submitted (noted as missing, above) would require appropriate analysis, concluding that the site is a unique historical remnant of the American Great Depression.

Finally, the Project Alternative Section is inadequate. The Recirculated DEIR fails to address an alternative of setting aside a portion of the site as a memorial park to honor and memorialize the use of the site by the CCC, WPA, CA Army Reserve, and CDF. Project Alternatives are required to include "a reasonable range of alternatives" and this reasonable alternative should be included.

2) County is a "Responsible Agency" regarding Zoning/Land Use

The Land Use discussion still is inaccurate and misleading. The General Plan and Community Plan Land Use designations are appropriate for the proposed sports fields, but the Recirculated DEIR states that RR Zoning only allows them under "Special Circumstances." The County determines whether such "Special Circumstances" exist and whether the ordinance requirements are met, not the District, unilaterally. This need for discretionary approval from the county makes San Diego County a "Responsible Agency" whose status the Recirculated DEIR still ignores.

Thank you for the opportunity to comment on the Draft EIR.

Sincerely,

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ATTACHMENT



## CHAPTER 5 CONSERVATION AND OPEN SPACE ELEMENT

natural resources, cultural resources, and multi-use trails. Most regional parks also contain a local park element by serving as the recreation outlet for a community.

- **Trails**—Trails provide recreational opportunities and allow for enjoyment by the public of parks and open space preserves. Trails provide connection between recreation uses. The County Trail Program is addressed in detail in the Community Trails Master Plan.
- **Recreation Facilities**—Recreational facilities include community centers, teen centers and gymnasiums and are operated and maintained by County staff, volunteers, and service contracts.
- **Preserves**—Preserves include areas of environmental significance and beauty. The dual purpose of preserves is to protect biological, cultural, and historical resources, as well as community character, and to make these resources available for public recreation opportunities. However, typically only minimal improvements such as trails, parking, and restroom facilities are found in preserves. Some preserves may also provide interpretive or educational amenities. Preserves vary in size depending on the resources being protected, and public access can be limited according to the sensitivity of the resources (*see also Goal COS-1 and related policies in the Biological Resources section*).

Open space in the County is provided by cities, the County, State entities, federal entities, special districts, private non-profit organizations, and land owners as part of the development process. The primary objective of open space within the MSCP preserve system is biological conservation. Open space may also be dedicated / preserved to meet other objectives such as preservation of cultural resources or avoidance of steep slopes. However, open space in general allows for the overall vision of this General Plan, along with the achievement of the County's strategic initiatives, to be met. Other



*Grasslands being preserved as open space in Ramona*

land uses, such as passive recreational opportunities, may be appropriate within open space areas depending on the sensitivity of the resources being protected. In addition to the Park and Recreation goals and policies concerning Open Space, see also goals and policies under the Biological Resources and Cultural Resources sections in this Element.

Existing sources of funding for park acquisition and development include federal, state, and local funds, donations, and through developer exactions. The Park Lands Dedication Ordinance (PLDO) provides funding for local park active recreation. The PLDO specifies that new subdivisions are required to dedicate active park land or pay a fee in-lieu of dedication, or a combination of both, at a level of three acres per 1,000 population. State law allows for up to five acres per 1,000 population if the current active park acreage exceeds the three-acre level. These fees may also be used to provide recreational services in regional parks for local community residents. The County also participates in agreements that establish partnerships with other public and private agencies (typically with non-profit organizations) to develop, operate, and maintain recreation facilities on land typically owned by those agencies. Existing sources of funding for open space land acquisition that will ultimately build out the MSCP preserve include local, state and federal funds and donations.

## GOALS AND POLICIES

### GOAL COS-21

**Park and Recreational Facilities.** Park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately ten acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County.



*The historic Rancho Guajome Adobe, Guajome County Park*

#### Policies

- COS-21.1 Diversity of Users and Services.** Provide parks and recreation facilities that create opportunities for a broad range of recreational experiences to serve user interests.
- COS-21.2 Location of Parks.** Locate new local parks and recreation facilities near other community-oriented public facilities such as schools, libraries, and recreation centers where feasible, so that they may function as the “heart” of a community.
- COS-21.3 Park Design.** Design parks that reflect community character and identity, incorporate local natural and cultural landscapes and features, and consider the surrounding land uses and urban form and cultural and historic resources.
- COS-21.4 Regional Parks.** Require new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present.
- COS-21.5 Connections to Trails and Networks.** Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses.

### GOAL COS-22

**Park and Recreational Services.** High-quality parks and recreation programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population.



*Lakeside Community Center*

#### Policies

- COS-22.1 Variety of Recreational Programs.** Provide and promote a variety of high quality active and passive recreation programs that meet the needs of and benefit County residents.