

Valley Center Community Planning Group

Minutes of the 13 April 2015 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: 23 April 2015

Approved: 11 May 2015

A		Call to Order and Roll Call by Seat #:								7:05PM				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
M I L L E R	O C O N N E R	J A N I S C H	H U T C H I S O N	B R I T S C H	P L O T N E R	Q U I N L E Y	F A J A R D O	B O U L O S	N O R W O O D	S M I T H	V I C K	R U D O L F	G A R R I T S O N	V A C A N T
P	P	P	P	P	P	P	P	P	P	P	P	P	P	

Notes:

Quorum Established: 14 present

B	Pledge of Allegiance
C	Approval of Minutes:

Motion: Move to approve the minutes of 9 March 2015 as corrected

Maker/Second: Quinley/O'Conner **Carries 14-0-0(Y-N-A):** Voice

D	Public Communication/Open Forum:
	<p>Jack Fox, audience, comments on the County's intention to repair paving on Old Highway 395 between Gopher Canyon Road and West Lilac Road. He suggests that, given limited funding for the project, the first section to be done, in 2016, is going to accommodate the commuting route of the County's District 5 Supervisor. The project will reportedly take the form of "band-aid®" patching initially. Those interested in more information can call Fallbrook Road Crew Superintendent Maldonado.</p> <p>Patsy Fritz, audience, comments on the Bonsall Sponsor Group meeting of 7 April 2015 that she attended the previous week. She says a developer accused the Sponsor Group of a Brown Act violation in connection with a position they were preparing for a project they were considering. She states that the developer further claimed that the sponsor group could not vote on a General Plan Amendment or a Specific Plan related to that project and that the developer flashed a phone before the audience purportedly showing an email from the County's project manager confirming the same. Fritz reports that she requested all the emails from PDS regarding the project for the past several months and discovered that no such email was ever sent.</p>

E	Action Items [VCCPG advisory vote may be taken on the following items]:
E1	Presentation on Cole Grade Road Improvement Plans by Michael Long. Mr. Long is the Project Manager for Department of Public Works, Capital Improvement Program for the County of San Diego. (Vick)

Discussion: Vick presents for the absent Michael Long, San Diego County Department of Public Works Project Manager. He notes that Long attended a joint meeting of the Mobility SC and the Valley Center Trails Association and reported that the 30% level of plans for the Cole Grade Road improvements had been completed and that the 70% level plans are nearly done. The project will not use lodge pole railings such as those on the Heritage Trail along Valley Center Road, but will, instead, use rope as a safer alternative. The Cole Grade Road improvements will be a pilot project for the state's Green Streets Program that requires

retention of water run-off from paved surfaces.

Vick notes Long's projection that up to 200 oak trees of various sizes along the margins of the roadway will be impacted by the proposed improvements, and that neighbors are upset. If the project receives a negative declaration of environmental impact, permits could be issued this year and construction could begin as early as 2016.

Smith asks how many traffic lanes there will be on Cole Grade Road from Cool Valley Road north to the High School. Vick says three. Rudolf confirms. Smith asks for clarification of the project schedule. Vick says the 30% plan level is done, the 70% plan level will likely be completed by July 2015 and the 100% plan level should be completed by September 2015. Rudolf says the Trails Association wants the accompanying trail extension along Cole Grade Road to have the look and feel of the Heritage Trail, so fencing is important along the west side of the roadway. He adds that the joint group requested a meandering trail to avoid as many oaks as possible.

Mary Bookout, audience, asks about project notification to residents. Vick says residents will be notified of potential impacts when plans are complete. Bookout asks how residents can participate in the planning process. Vick notes the Mobility SC meetings as a forum. Mr. Bookout [no first name given], audience, asks about the possible use of retaining walls for slopes along the road edge. He declares that if no retaining walls are to be built in areas with steep roadside slopes such as those present on his property, grading will take up to 15 feet of his property for a distance of 525-feet along the road. He is not pleased about that prospect.

Motion: None

E2

The County of San Diego, Department of General Services, is processing a request to vacate an existing flowage easement located over private parcels near Valley Center Road (APNs 189-012-59 and 189-012-62). The San Diego County Flood Control District finds that the flowage easement is no longer needed as it has been replaced with a more restrictive open space easement. As part of the vacation process the Department wishes to solicit input from the VCCPG. (Miller)

Discussion: Thomas Harrington, County of San Diego, Senior Land Surveyor, presents the proposed vacation of an existing flowage easement near Sunday Drive and Valley Center Road. He notes that the easement amounts to merely a warning of the potential 100-year flood level and imposes no particular restrictions. He adds that it is replaced by a wide biological open space and set back for Moosa Creek that does impose restrictions. He discloses that the Federal Emergency Management Agency [FEMA], as well as the County Flood Control District, has reviewed and approves of the vacation request. The new open space will give the County the ability to make channel corrections if needed.

Miller says this vacation request is a continuation of a discussion begun at the South Village SC meeting. He notes that Rudolf and he were to ask questions about the vacation request and that Rudolf got answers. Miller says the vacation action may be a *fait accompli* at this point. Rudolf asks about the conversation that revealed this vacation requirement. David Hennis, Chief of Land Development Engineering, PDS, says the vacation issue was part of the tentative map process for the Butterfield Trails project. Rudolf asks if this flowage easement issue was brought to the attention of the South Village SC. Hennis says the vacation issue was item 38 of the standard condition issues presented on the tentative map. Rudolf asks if the environmental report covered this vacation. Hennis responds no. He says no grading is to be performed which would trigger an environmental report.

Rudolf recalls the developer asking for relief on the double easement setback, adding that VCCPG could see no particular reason for the doubled setback and agreed with the developer at the time. He then suggests this vacation request may give us leverage to recover some of the Valley Center Road median lost as a result of the developer's requirement for a left-turn acceleration lane. Hennis says the flowage easement is incorrectly placed and this action is a corrective process. Rudolf asks why the County is returning to the VCCPG now. Harrington says it is a state issue that must be checked off. The action is required by County Counsel. Janisch asks who owns the property. Harrington says the developer owns the property and the easement overlays it. Janisch asks about the possibility of building on this property. Harrington says a couple of lots would be encumbered and would experience some development difficulty. Harrington says he can't help VCCPG to modify the present median removal issue. Rudolf confirms Sunday Drive will not be affected. Plotner says

Valley Center values its rural environment and loves the planted median. She comments that a “good neighbor” would work with the community to modify the median issue. She asks about the 100-year flood and wonders about how such floodwaters would be handled. Harrington says the project engineer studied the area and had to prove to FEMA that the channel would handle a 100-year flood. FEMA would have to agree, and at this point it has. Plotner asks for assurance that floodwater would not be diverted elsewhere. Harrington says no. Norwood observes that there are two separate issues, the VC Road median and the flowage easement, and Harrington has nothing to do with median.

Motion: Move to approve the Vacation of the Flowage Easement

Maker/Second: Miller/Rudolf

Carries 13-0-1 [Y-N-A] Voice; Janisch abstains

E3

Champaign Gardens Specific Plan Area. The Champagne Gardens Specific Plan was adopted by the Board of Supervisors on January 13, 1999, and expired on January 13, 2007. The Specific Plan called for the development of visitor-serving commercial uses to include lodging, retail, restaurants, and an amphitheater, among other uses. The properties associated with this former Specific Plan are located on both sides of Champagne Boulevard, between Lawrence Welk Lane and Gopher Canyon Road, just east of the I-15.

The Champaign Gardens Land Use Map has a 0 density for the area, so property owners could not build a single family residence on a legal lot, and allowed uses are very limited in the S88 zone without an adopted Specific Plan. PDS intends to work with property owners, associated planning groups. (the area is at the intersection of the Bonsall, Valley Center, and Hidden Meadows planning areas), and other stakeholders in developing proposals for updated General Plan Land Use designations and zoning for these properties within the former Specific Plan boundaries.

Discussion: Rudolf introduces Kevin Johnston, PDS Advanced Planning. Johnston describes the location of the subject parcels. He identifies it as a property specific request that is part of the General Plan Amendment for such requests. He states that a Specific Plan Area [SPA] for the subject parcels was initiated in 1999, but was not consummated and expired in 2007. The parcels now have the same land use designation as under the old General Plan [GP]. Previously the parcels were zoned commercial, so there is zero density for them on the General Plan Update [GPU]. He explains why this project is using this property specific request process. The intent is not to recreate the SPA. The owners want more conventional zoning and land use designations. The County wants consistency with the new GP. Johnston reviews the handouts he has distributed. He reviews the timeline for the process. His location map identifies areas to be considered by VC. He reviews a number of maps and then the planning process schedule. Hutchison asks about the prospect of 3 village centers in Valley Center. Johnston reviews the land use policies germane to this project. He asserts that the applicants cannot make this a commercial center. Rudolf asks if the County’s land use policy LU-1.2 applies. Johnston says there is no existing village presently since the Lawrence Welk Resort does not qualify as a village center under the Community Development Model. However, it would require further study. Rudolf asks about the project relative to the Multiple Species Conservation Program [MSCP] and Pre-approved Mitigation Area [PAMA]. Johnston says parcels 2,3 & 4 are part of the PAMA. He notes that the County wants to save 75% of PAMA from development. Rudolf says the MSCP for the north county may not be approved until 2017, therefore property owners have no present requirement to preserve 75% of PAMA lands they own. Rudolf cites the last paragraph of an email from Dan Silver [Executive Director, Endangered Habitats League] concerning preservation of significant habitat as it relates to the subject parcels. Rudolf says parcels 4 & 5 are closer to Lawrence Welk, so, he recommends SR-2 for parcels 2,3 & 4. Rudolf says VCCPG could recommend SR-10 for those parcels so the conservation subdivision provisions could apply. He notes that the SC recommendation would allow 20 units on 2,3, & 4 combined.

Developer Mark Kelton, recalls he has owned the subject property for about 30 years [3&4] and recalls that a 240-unit resort and convention center were planned under the now-expired SPA. He says he has no delusions. He suggests that he can leave 35-60% open space under his plan. He describes the condition of parcels 3 & 4. He is hoping for SR-0.5. He does recognize the limitations of the steep slopes on-site. The project will have to build a stream crossing and the project will need higher density to make economic sense with the considerable biological and geological constraints. Rudolf **shows** presents a diagram illustrating 94 units on these parcels. Kelton acknowledges that such a density may be unreasonable. Rudolf says the SC voted 6-1 to approve the SR-2 designation; Rudolf was opposed. Vick asks why Rudolf opposed. Rudolf

contends that the narrow area cannot function as a preserve corridor for distant preserves, like Hellhole Canyon, under PAMA if the project is allowed the higher density. Kelton says the MSCP is not complete, but he wouldn't want to develop parcel 4 anyway. Boulos cites the Dan Silver email and says it is already difficult to build on parcel 4. Rudolf says the motion doesn't include concerns cited by Dan Silver. Farjardo asks if anything is being done to preserve the steep slope areas. Rudolf outlines the MSCP process and the lack of a plan in North County. With no MSCP plan, developers must deal with the County, state and federal government for permits. With an MSCP plan, the review and permit process is streamlined. Britsch notes that the MSCP designation does not eliminate the possibility of development, it's just more restrictive. Boulos and Hutchison ask for clarification of potential densities in land use designations SR1 and SR4. Johnston responds with density figures for both. Patsy Fritz, audience, comments on the potential septic problem for these parcels and asks if percolation tests have been done. Asks about sewer connectivity. Johnston acknowledges septic issues but says sewer connections are possible.

Motion: Move to approve SR-2 on parcels 2,3, & 4 which would result in 20 units for all three parcels

Maker/Second: Rudolf/Janisch

Carries 12-2-0 [Y-N-A]

MILLER	O'CONNOR	JANISCH	HUTCHISON	BRITTSCH	PLOTNER	QUINLEY	FAJARDO	BOULOS	NORWOOD	SMITH	VICK	RUDOLF	GARRITSON	LAVENTURE
Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	

Notes:

E4

Discussion and vote on Planning Group comments and recommendation to PDS concerning Lilac Hills Ranch (Accretive) project. Lilac Hills Ranch/Accretive (PDS2012-3800-12-001 (GPA), SP12-001) is a development 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. 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)

Discussion: Smith introduces the project and announces that the applicant's media presentation must be focused on information received from the County. Smith introduces Accretive and Jon Rilling after which Casandra Costa, Chris Brown, Randy Goodson identify themselves as officers of Accretive Investments Inc. or consultants. Rilling presents saying much work has been done on the project over many years. He cites his community involvement in Valley Center. Goodson raises the issue of BOS policy I-1 and speaks to the form from the County on which the VCCPG must make its recommendation. Costa describes several of the project details. Goodson reviews the services needed for the project: water, sewer, fire protection, schools, parks, and claims agency approval for all. Costa describes the project location and its relationship to some services. Goodson cites other projects in a five-mile radius and their purported densities. Rilling describes the mixed-use development being proposed. Costa defines Accretive's 10-minute rule of walkability, claiming all areas of the project are within 10-minutes walk of commercial services. Goodson speaks to architecture and senior citizen housing. Rilling continues the architecture presentation. Smith interrupts. He contends that Rilling's information on possible architectural styles is not germane to the issue before the VCCPG. Rilling counters that such information is in the Specific Plan and continues. Costa lists the types of amenities considered for the project. Rilling points to open spaces planned for the project. Goodson addresses water use and recycling. He then notes to the proximity of the project to I-15 and cites the hoped-for expansion of public transit. Time for the applicant's media presentation expires. Rudolf asks about the relevance of the project to the lawsuit SANDAG recently lost at the California Supreme Court in regard to greenhouse gas emissions. Goodson says the project is unrelated to the suit. Goodson continues his presentation saying that no eminent domain is required for the roads that will serve Accretive's project. Rilling speaks to preserving steep slopes on the project site.

Hutchison presents the SC report. He cites the SC's recommendation to reject the project on the basis of the past four years of review and to attach the comments for Section A [appended below] to the County's Form. He notes that there have been five Specific Plan reviews and two Environmental Impact Report reviews in the past four years, but little of substance has changed and what did change wasn't necessarily for the better [10 road

standard modifications]. He comments that while there have been no County responses to the over 500 pages of comments to the Draft Environmental Impact Report [DEIR] and Revised Draft Environmental Impact Report [RDEIR] submitted by the VCCPG there remain many areas of contention and controversy. He proceeds to expand on some of those.

Hutchison cites the project's inconsistency with the San Diego County General Plan and Valley Center Community Plan challenging the logic of the assertion in the DEIR and RDEIR that the project will be consistent with the adopted County General Plan [GP] and Community Plan [CP] if the proposed General Plan Amendment [GPA] is approved. He also challenges the logic of the proposed General Plan Regional Category change making the project consistent with numerous other GP and CP goals and policies. A GP amendment should not mitigate the numerous, serious environmental impacts proposed by this project. The RDEIR does not analyze the far-reaching implications of the approval of this Leapfrog Project on similar projects throughout the County. He asserts that Approval of the Project's Specific Plan requires a GPA that would likely invalidate the EIR for the County's General Plan.

Regarding the project objectives, Hutchison suggests that the objectives for this project, presented in the RDEIR, attempt to carefully define a need that the project can easily fulfill without thoughtfully considering the overarching goals and objectives of the GP and its current Regional Categories.

He observes that the project proposes five phases with extreme flexibility in the order that each phase would be developed. Hutchison observes that the traffic impact mitigations for the project are tied to phased events that may never happen and the phasing scheme, and all its permutations, have not been properly analyzed in the RDEIR. He asserts that there is no assurance that all phases will ever be built. He also notes that the project proposes no import or export of soil in total. But, he observes that the ambiguous phase implementation sequence is problematic, since Phase 3, the largest phase, will be the net source for fill in all the other phases and is therefore required to be at least partially graded along with the first and any other phase. This could lead to an erosion problem in Phase 3 that could impact the associated wetlands of the Project for the 10 or more years anticipated for project completion. The phasing scheme will have vastly different environmental impacts than those analyzed in the RDEIR.

Hutchison remarks that the project lacks the ability to acquire legal right-of-way [ROW] for ingress and egress. He notes the several proposed West Lilac Road improvement scenarios that will straighten and widen the roadway along the north boundary of the project and add features at the road edge and roundabouts. The County will have to use eminent domain to achieve these improvements to benefit the project while removing two private dwellings in the process. The proposed improvements will not meet the current plan for upgrading West Lilac Road to a 2.2C standard. He says there will be additional eminent domain takings of private easement rights for the Covey Lane/West Lilac intersection and its approaches. He adds that Mountain Ridge Road including the intersection of Mountain Ridge Road and Circle R Road is the subject of at least three alternatives, all of which will require eminent domain for the taking of private road easement rights and at least one dwelling. The project cites this road as the required secondary access without explanation of how the ROW will be acquired except by eminent domain. Further, Rodriguez Road is cited by the project for improvement for alternative access, but there is no discussion of those improvements or the legal rights to use it for access.

There are many significant environmental impacts wrought by the project according to Hutchison. Among the biological impacts, the project provides no meaningful data to support the removal or mitigation plan for 3 sensitive plant species and 13 Group 1 animal species. For the open spaces designated by the project along the riparian habitats, there would be severe edge effects from domestic pets, weedy plants, people and night lighting. Further, the project doesn't realistically address its contribution to the cumulative impacts of similar developments in the County. Anthropologically, grading 4+ million cubic yards of earth will jeopardize the opportunity for future study of promising early human habitations on-site in the project area which are as yet undiscovered. Locating the project, a dense urban development, in an agricultural area will expose sensitive receptors, particularly in the proposed senior community, to agricultural chemicals. The Project fails to provide the needed buffer zones to protect the existing agricultural operations from the urban intrusion. Sewage for the first phase will be initially collected and hauled out by truck until sewage facilities are built or extended

concurrent with the development of subsequent phases.

Hutchison continues saying the Emergency Response Plan for natural disasters, such as fires, earthquakes, or floods, does not adequately address the limited number of public roads available for evacuation of 5185 project residents in addition to the rest of Valley Center to the west or east. The 10 modifications to County road standards, proposed by the project, will make the evacuation process worse by lowering road design speeds, narrowing roadways and causing immitigable level of service issues for both Valley Center and Bonsall. The project has not demonstrated that it can meet the required 5-minute response time for fire service to the entire project. Hutchison points out that the project is proposing inadequate buffer zones and building standards to mitigate the Very High Fire Hazard Severity Zone that the project is proposed for. This location, for such a large project, is inconsistent with smart, preventive land use planning. The project fails to meet the standard 100-foot Fuel Modification Zones for significant portions of the project. The project proposes to put a large development 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. It also depends on dubious private road access, some of which will be gated, further worsening fire protection response times.

Hutchison charges that the project will cause significant irreversible and immitigable impacts to the site including moving over 4 million cubic yards of earth, loss of hundreds of acres of productive agricultural land for future production, and loss of biological habitat. One of the project alternatives could eliminate these irreversible impacts and remain consistent with the General Plan. Sewage presents challenges for this Project and the wider community by requiring the ultimate expansion and upgrading of the Lower Moosa Water Reclamation Facility, and extension of sewage and reclaimed water pipes a considerable distance to the project causing severe disruption along Circle R Road and West Lilac Road for an extended period.

Aside from the preferred General Plan Alternative, Hutchison says the one project alternative, not treated in the RDEIR, that best satisfies the objectives of the project is the Downtown Escondido SPA.

Addressing the project's Specific Plan, Hutchison asserts that the project is improperly located in Valley Center and Bonsall. The project will generate very significant traffic with minimal attention to roads to address that traffic. The added traffic will create excessive Greenhouse Gas Emissions [GHG] that will severely complicate SANDAG's efforts to reduce those emissions. The project will overturn virtually every element of the recently adopted General Plan. The project will require extension and expansion of public infrastructure and services into an area for which they were not planned. The project is inconsistent with the pre-requisites and principles of LEED-ND for location and is inconsistent with the Community Development Model as it is applied to the Bonsall and Valley Center communities. The project threatens existing agriculture on-site and will threaten agriculture surrounding the project.

Hutchison concludes by making a motion to reject the project and approve the SC's comments for the County's recommendation form.

Vick quotes Goodson saying that a school has been approved, and yet, Vick notes that the Valley Center Pauma Unified School District comments contradict that statement. Rilling says Bonsall school district is interested in running the school. Goodson says they are looking at a charter school. O'Conner asks if residents will use a charter school. Plotner asks about eminent domain and asks if parcel owners have agreed to eminent domain. She suggests a delay in VCCPG's consideration to get more information. She asks about the grading cut and fill problem. She suggests Accretive propose methods to contain the erosion anticipate for the phase 3 grading. She expresses concern about the overburdening of private road easements. She asks if the biological impacts are adequately addressed and follows with a request for GHG clarification. She indicates that a good neighbor policy for these issues works best.

Goodson responds that an eminent domain request is not included in the project application. He says the use of eminent domain was based on a request from the County. He addresses the Covey Lane intersection and Mountain Ridge/Circle R Road intersection plans. He claims the project received a request from the Deer Springs Fire Protection District [DSFPD] to provide a fire station site within the project. He asserts that the West

Lilac Road 2.2F /2.2C issue does not exist since a designation of 2.2F requires no eminent domain. Rilling speaks to phasing and cut/fill requirements. He points out that they have a grading plan, and have specific requirements that the grading plan addresses. Goodson disputes data on phasing and grading, although it is pointed out by Hutchison that the data is expressed in the RDEIR. Goodson speaks to the EIR process as a county process. He claims the five-minute response time can be addressed by the project's proximity to the state's CALFIRE station at Miller Road. Hutchison rejoins with contrary information from a letter sent to Accretive and the County from Chief Amestoy of DSFPD. Boulos asks Hutchison if there was an opportunity to share information between Accretive and SC. Hutchison says, yes. He notes that Accretive's consultant Chris Brown attended many meetings of the LHR SC and VCCPG where these issues were discussed. Boulos speaks to the agriculture buffer zones and chemical drift. Hutchison responds that state law provides guidance for developments that invade agricultural areas. Boulos asks about the high fire hazard severity zone. Rilling responds that they are increasing availability of water for fire protection. O'Conner speaks to the electronic gates proposed for the southern ingress and egresses and how they will impede fire service access. Vick asks why the project requests to up-zone the entire 608 acres to accommodate 1746 dwelling units but only provides detailed information for phase 1. Further, the project wants entitlement approval to up-zone 608-acres while making commitments only for phase 1. Goodson says that is true, adding that the appropriate information is in the Specific Plan. Vick reiterates the question. Goodson demurs. At 9.40 pm, Smith moves to extend the meeting until 11 pm. 1-0-0 Quinley seconds.

Public Comments [speaker slips and others]: **Eric Vidal** observes that people live in VC because they want a rural environment. He says building next to a freeway brings more freeways and development. He cites Los Angeles as an example. He acknowledges likeability of Accretive personnel. However, he wants to preserve VC where open land is the majority and rooftops are in the minority. He adds that eminent domain is barely American. **George Goodrich** says he has noticed the project for quite awhile and is concerned about the project. He can't see anything wrong with project and would like to be a part of the project. **James Gordon** asks Goodson if his premise of not needing eminent domain for the project is referring to phase 1 or the entire project. Goodson says no eminent domain is needed at all. Gordon reiterates. Goodson reiterates. Gordon says Accretive needs the private roads. Goodson refuses to agree. **Seth Essinfeld** says it is naïve to think growth will not occur with the presence of four casinos. He thinks more consideration should be given to the project and its responsible developer. **Charles Davis** applauds the SC and speaks to infrastructure and the projects impacts to it. He suggests that I-15 will be more severely impacted with project. He cites other impacted roadways. He says the government is not providing sufficient infrastructure. **Brian Johnson**, Oceanside, says as a transplant, it is naïve to think growth will not occur. If LA had this level of planning it would be a different world. He supports the comprehensive nature of the project. He postulates that growth is inevitable. **Jack Fox** comments on blog article by J. Harry Jones [Union-Tribune reporter] citing comment by Goodson. Proposes County and VCMWD implement a moratorium on development with current drought. Indicates belief Supervisor Bill Horn is behind projects like this one. **Ann-Marie Nelson** cites the good work of O'Conner and Hutchison and indicates her pleasure in voting for them. She cites the San Elijo Hills project, built by Accretive, and the problems of density and traffic congestion associated with it. She moves on to cite other nearby projects to LHR and indicates that traffic will worsen as a result of the project. **Florence Griffis**, speaks to the Covey Lane, Rodriguez Road, and West Lilac Road intersection dilemmas. She points to the intersection and the potential traffic dangers posed by project. She says the proposed commercial entities in the project will not satisfy local needs and will not provide many jobs for workers. **Patsy Fritz**, asks, rhetorically, what the proposed infrastructure will cost new residents; over \$100K for each dwelling. She says only a small pocket park is required in phase 1 [which works out to a 12'x13' plot per unit]. She charges that the reduced road standards were requested by Accretive, not the County, with the objective of lowering the construction cost. **Patricia LaChapelle** addresses the problem of evacuation of the project to the east along West Lilac Road. She says it would be a disaster. She wonders why we have a GP when developers simply ask to change it to accommodate their project. **Boris Dobrotin** cites the excessive traffic already on VC roads. He says he was thrilled by adoption of GP Update and thinks it should be adhered to. **Mark Jackson**, speaking to eminent domain, says he responded to the RDEIR asking for information on required takings for public and private roads. He reports that there are 22 takings identified in the RDEIR. He asserts that sewer and recycled water easements are not currently available. **Ray Ewing** cites the inadequacy of current roads and worries about public safety if the project is approved. **Bob Franck** applauds the work of the LHR SC and indicates his concern is fire evacuation. The project and its fire protection plan are a recipe for disaster. Circle R and West

Lilac are inadequate presently and the project will make evacuation worse. He doesn't understand why the County would accept this liability. **Josette Franck** agrees with all the preceding negative comments on the project. **Bruce Christiansen** opposes the project citing traffic concerns and misleading information. He says Accretive promised to widen the [Maxwell] bridge but now has no plans to do so. He says there are many traffic safety issues. **Karen Jackson** applauds the work of the LHR SC. She notes that VCCPG must do what is best for the community. She opposes this project. She cites the recent fire [May 2014] where only 20 minutes was allowed for evacuation. She raises the prospect of a very difficult evacuation for the proposed residents of the project, especially the seniors and elderly. She urges a vote against this project. **Stacie Green**, Solana Beach, cites the passion and resources of Accretive to develop a smart community. She urges support for the developer. **Deb Hofler** cites her qualifications as a former VCCPG member and business owner, and recounts the plan for growth in VC according to the General Plan, without this project. She suggests the developer build according General Plan. She says the developer is not considering VC. **Lael Montgomery** seconds Hofler's remarks. She suggests to Goodson that he buy land in the North or South Villages and build his project there, not on agricultural land. **Robert Alvarez** says the project is a reasonable project. He cites the fatalities on rural roads. He says the project will help to solve the narrow road problem. **Greg Duschnak** maintains that the project will add to the congestion during an evacuation. He says outsiders should not be able to come here and dictate to VC how to build and should respect the General Plan and Community Plan. **Unknown speaker** cites distances to recreational facilities and congestion. He opposes the project. **Shawneen Burdick** suggests Accretive personnel have integrity. She bemoans the misinformation being presented at the meeting. She wants her children to move to VC but says more affordable housing is needed. She says Accretive has the appropriate service approvals for fire, sewage, and water. **Nancy Lane** speaks to fire evacuation. She says LHR does not cause congestion in VC, it is Temecula residents going to San Diego. She suggests that the project offers options other than five-acre agricultural estates. **Kim Holmes** says she is a former Hidden Meadows resident and desires to move back to VC to such a project. She cites her respect for Accretive personnel. She says that sacrifices are worth making for this project.

VCCPG comments/questions: Rudolf cites his personal legal experience with planning and land use. He recounts his extensive community involvement in creating the GP Update. He says during preparation of the General Plan, he looked on the west side of VC for another village center site because of the septic moratorium then in place. He found no suitable place. He cites the designation in the GP for the current north and south villages and the diminishing density at periphery around those villages. There was no vision to have a city of Del Mar's size in VC's agricultural area. The village areas are beginning to take shape where most of the population lives. He points to the lack of planning information from Accretive. He urges approval of the motion. Norwood comments that she has heard some in the community say LHR is a good place for such high density. She notes that other residents say the developer bought residential property and they are upset about the proposed change to the General Plan land use designations for the project. She says the community will change, like it or not. She adds that she will vote no based on the preponderance of community opinion opposed to the project. O'Conner speaks to the reasons people move to VC, particularly the rural life style. He says the developer should not come to VC with plans to change the General Plan. Vick says VCCPG members are elected to uphold the General Plan and Valley Center Community Plan. The way to disagree is not to approve a bad plan that will disrupt the community. Fajardo asks why non-residents are here to support the project. Boulos asks if more study is needed and a decision should be postponed . Quinley calls for the question. Garritson responds to eminent domain. He has concerns about eminent domain being used for a private project. He questions whether eminent domain will actually happen. He applauds the efforts of the LHR SC. He asks if the project is approved. Quinley and Rudolf clarify.

Motion: Move to extend the meeting adjournment time to 11 pm

Maker/Second: Smith/Quinley

Carries 13-0-0 [Y-N-A]: Voice; Britsch recused

Motion: Move to reject the project and attach the comments submitted by the SC to the County's formal project recommendation form

Maker/Second: Hutchison/Quinley								Carries 11-2-0 [Y-N-A]:						
MILLER	O'CONNOR	JANISCH	HUTCHISON	BRITTSCH	PLOTNER	QUINLEY	FAJARDO	BOULOS	NORWOOD	SMITH	VICK	RUDOLF	GARRITSON	LAVENTURE
Y	Y	Y	Y	R	Y	Y	Y	N	Y	Y	Y	Y	N	
Notes: Britsch recuses himself based on proximity of his property to the project.														
E5	1. PDS2014-TM-5596, ER 14-09-009. Project location is 15936 Vesper Road. Principal is Joel Waymire, Polaris Development Consultants at 619-444-2923. Proposed residential development of 9 lots each with 2 acre minimum lot size. There will be grading for access roads and build pads. Water will be provided by VC Water District and wastewater will be handled with on-site septic systems. (Miller)													
Discussion: Continued for lack of time														
E6	PDS2015-7PM-21219, PDS-2015-ER-IS-02-001 Hill Top Ranch located at 30718 Pauma Heights Rd and Palomar Vista Road; owners are Gregory Beck and Suzanne Chaves at 714-308-0423; contact person is Larry Paxton at 760-294-4871. The project plan is Emmet Aquino at 858-694-8845. The project consists of a 21.1 acre parcel which will yield 5 lots each at least 2 acres. The project will rely on septic. (Fajardo)													
Discussion: Continued for lack of time														
E7	Discussion and final vote on proposed VCCPG Standing Rules Amendments to Articles II. Members, III. Duties, and V. Subcommittees. (Rudolf)													
Discussion: Continued for lack of time														
E8	Discussion and possible vote on County PACE program. Planning & Development Services has announced a new Purchase of Agricultural Conservation Easement (PACE) Program application cycle. This program encourages the conservation of agricultural properties throughout the County by providing financial compensation to property owners in exchange for placing an agricultural conservation easement on their property. Applications will be accepted from March 16 through April 30. (Smith)													
Discussion: Smith briefly reviews useful aspects of the PACE program following Open Forum before moving on to the first agenda item.														
Motion: None														
F	Group Business													
F1	1. Discussion and vote on subcommittee membership.													
Discussion: Continued for lack of time														
F2	Notice of Vacancy for VCCPG Member # 15, term ending January 1, 2017.													
Discussion: Continued for lack of time														
F3	BOS discussion and vote on GP Update land use policy LU1.2 interpretation scheduled for April 22, 2015.													
Discussion: Continued for lack of time														
F4	Next regular meeting scheduled for: May 11, 2015													
G	Motion to Adjourn: Meeting time expires											11.00 pm		

	Maker/Second:	Carries/Fails: [Y-N-A]
Subcommittees of the Valley Center Community Planning Group		
a)	Mobility – Jon Vick , Chair	
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 – Bill Miller , Chair	
g)	Tribal Liaison – James Garritson , Chair	
h)	Website – Jeana Boulos , Chair	
i)	Lilac Hills Ranch – Steve Hutchison, Chair	
j)	Solar – Oliver Smith, Chair	

Correspondence Received for the Meeting:

1. PDS to VCCPG; Lilac Enterprised Inc.; PDS 2015-AD-15-004; FR 15-08-005; Solar Farm on Beatitude Drive near Hideaway Lake Drive; Owner is Lilac Enterprises, contact is Jennifer Kemme at 909-754-8300 or jenkemme@visionce.com. A solar project on 6.46 acres and contains 303 modules accessed by an existing asphalt drive. (Smith)

2. Final Agenda for the San Diego County Planning Commission of Friday, March 12, 2015, in which Aguacate Major Use Permit (PDS2013-MUP-13-022 will be subject to vote and approvals.

3. PDS to VCCPG; Tractor Supply; PDS2015-STP-15-005;Owner is Bell Holdings, LLC, Steve Flynn, President; email: steveflynn@aol.com; phone 858-753-3589; contact person is Ross Burnett; email: rburnett@sterlingwarner.com; phone: 702-210-1944; location is 27444 Valley Center Road. The project includes the construction of one 18,825 square foot retail store with a 15,000 square foot outdoor display area to be built on 3.70 acres and will include 90 parking stalls. In addition to tractors and tractor supplies, the store will sell livestock and pet products, hardware and tool products and work clothing among other items. (Vick for Mobility; Miller for South Village)

4. DPS to VCCPG; Intent to adopt a Mitigated Negative Declaration for the County of San Diego Bee Ordinance. Proposal to amend the Ordinance to implement a three-tired approach to setback distances for placement of beehives on public and private property in proximity to dwellings. Comment period runs from April 2 to May 1, 2015.

Materials appended related to Item E4:

A. Valley Center Community Planning Group [VCCPG] Comments on the Proposed Lilac Hills Ranch General Plan Amendment and Specific Plan [PDS2015-3800-12-001 GPA; PDS2012-3801-12-001 SP]

The Valley Center Community Planning Group has been reviewing this project for several years. Little of substance has changed in the Project’s design and plan over the course of many review cycles, despite voluminous comments on deficiencies and inadequacies in such basic aspects as consistency with the County General Plan, consistency with Community

Plans, project location, infrastructure, public services and environmental impacts. To date, we have seen no responses to the hundreds of pages of comments submitted.

We, as a group, have commented on two Environmental Impact Reports [EIR] and at least four versions of the Specific Plan for this Project. In those comments we have identified numerous areas of contention and controversy with respect to representations made about the Project. We have also suggested an alternative to the Project that has been too hastily disregarded by the applicant and the County staff.

Below are some of the areas of contention and controversy that have been reported in greater detail in the VCCPG comments on the Revised Draft EIR for this Project:

1. Project's Inability to Acquire Legal Right-of-Way

There needs to be a frank and succinct discussion of the Project's lack of legal right-of-way [ROW] for roads, sewer, and recycled water. The discussion needs to make clear to decision-makers how offsite improvements required for this Project will be acquired. There are 30 or more ROW acquisitions that the Project requires. The Project has made little progress in four years on acquiring required ROW. It is highly likely that the use of eminent domain for a minimum of thirty and likely a greater number of separate takings of unwilling property owners' land or interests in road and utility easements will be required to make this project feasible.

The County of San Diego has received hundreds of pages of factual information from multiple attorneys that demonstrate the absence of many legal rights for the Project's intended use of private roads and ROW for sewer and recycled water utility pipelines.

The County has taken the position that private road ROW disputes are between individual private parties. However, the County of San Diego has certain knowledge that offsite road improvements for the Project will require the County's use of eminent domain to acquire ROW for the Project.

The County needs to disclose information for the Project and each of its access alternatives so that impacts are identified and required mitigation can be implemented.

A. There are a few proposed scenarios for the improvement of West Lilac Road in relation to the Project. These include widening and straightening the travel lanes, adding features at the road edge and adding roundabouts. To accomplish these improvements will require the taking of private land by eminent domain. The County should disclose the precise impacts of the various alternatives and the possible mitigation options. Additionally, a rationale for considering alternatives [such as 2.2E or F] to the existing mobility element plan for upgrading West Lilac to a 2.2C standard should be shared.

B. The Covey Lane/West Lilac intersection has only partial Irrevocable Offer to Dedicate [IOD] availability that is likely inadequate for all the slope considerations of the redesign. Further, the proposed intersection redesign is complicated by the proximity of Rodriguez Road.

C. The Mountain Ridge Private Road including the Mountain Ridge/Circle R Intersection is the

subject of at least three proposed alternatives all of which will require eminent domain to accomplish and one of which will take the road from private to public. The Project cites this road as a secondary ingress and egress without explanation of how ROW will be acquired except by eminent domain.

D. Rodriguez private road is also cited in the Project plans for improvement to provide alternative access. However, there is no detailed discussion of all the improvements proposed for Rodriguez Road as represented in Master Preliminary Grading Plan TM 5571 RPL 4 Sheet 7 of 12. There is also no discussion of the access rights to Rodriguez Road.

2. Phasing

The Applicant seeks the utmost in flexibility in developing the Project in five phases of which there are many possible permutations, and no assurance that the Project will perform on the Conditions of Development.

The County has endorsed this approach without any assurance of performance by the Applicant, such as bonded indemnification to ensure specific performance.

The Applicant states in the Specific Plan and the County states in the Revised Draft EIR [RDEIR] that some phases may never be built. Mitigations for traffic impacts are tied to phased events that may never happen. This is a serious defect with the RDEIR. There is no assurance that promised mitigation will ever occur.

The Project represents that it requires no import or export of soil for all phases in total. The Project requests any possible phase implementation sequence. It is clear that Phase 3, with the largest surface area of all phases, is the net source of fill dirt for all of the other four phases and is required to be at least partially graded concurrently with the first and any other phase. The use of Phase 3 as a quarry for fill dirt for the initial phase and subsequent phases of development is not adequately addressed. Further, grading phase three in advance of development to procure fill dirt will expose the graded areas and the adjacent wetlands to erosion, an unacceptable outcome.

Phasing of the Project will apparently result in phasing of the consequent mitigation requirements but will not necessarily match the needs as they arise. For example, improvements to roads required by significant impacts will be triggered by attainment of a threshold number of residential units without regard to commercial development, which is a greater driver of traffic impacts.

Another related defect of the phasing proposal is that the sum of the traffic related analyses, for example, have analyzed fewer than 50% of the possible permutations of phase execution that the County has endorsed in the RDEIR.

The phasing strategy, as proposed by the Applicant, will have vastly different environmental impacts than those analyzed in the RDEIR. The phasing plan should be specific in terms of order and analyzed accordingly.

3. Project Objectives

The County has structured the objectives -outlined in the RDEIR, 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 has taken 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: *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 County has structured Objective One of the RDEIR 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: *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.*

The Project does not meet Objective Two.

Objective Three: *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 would have to comply with this objective.

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.*

The Project does not meet Objective Four.

Objective Five: *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 would have to comply with this objective.

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

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

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

4. Project inconsistencies with Regional and General Plans

In comments submitted over the last two years, 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 comments have also challenged the logic exhibited throughout Accretive Investment Group's Specific Plan and in the RDEIR: 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 RDEIR fails to disclose and analyze these broad and fundamental inconsistencies and their environmental consequences, as the California Environmental Quality Act [CEQA] requires. The RDEIR is derelict in concluding as it does that: "The proposed project includes a General Plan Amendment, which if approved, would result in the project being consistent with the General Plan". An Amendment to the General Plan should not mitigate the serious environmental impacts of this Project.

The RDEIR 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 RDEIR has only a rudimentary matrix of so-called Consistency with the General Plan in appendix W. However, the serious and unbiased analysis of consistency with the General Plan and the Community Plans has not been produced.

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 EIR. 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 RDEIR 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.

5. Significant Environmental Impacts of the Proposed Project

A. Biological Resources – The RDEIR and Biological Resources Report cite three sensitive plant species and 13 Group 1 animal species ranging from lizards, snakes and jackrabbits to raptors, passerine birds and mule deer. It then proceeds to suggest that the loss or mitigation for these species does not represent a significant impact despite a lack of meaningful data to support that assertion.

Severe edge effects are a likely outcome for the proposed preserved habitats (largely wetlands) that will be segregated by signs and fences.

The RDEIR 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 sensitive vegetation formations 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 much smaller projects isn't an effective measurement of cumulative effects.

B. Cultural Resources

The RDEIR 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.

C. 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 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 RDEIR instead chooses to address buffers against hazardous materials in the 2.4 Agricultural Resources subchapter. Perhaps it seems like more of an agricultural problem in that context than a problem caused by poorly placing an urban development in an agricultural context.

The proposed wastewater recycling facility [WRF], will not be built to coincide with the earlier phases of the Project, requiring that sewage be 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, lower the design speeds of those roads and assign some mobility element road segments to the list for failing roads with no beneficial mitigation possible. With lower design speeds, narrower roadways and immitigable level of service issues, 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, a panic evacuation will result over a single narrow, winding road made treacherous by the ensuing smoke plume.

The Project has not demonstrated that it 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 for new development.

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 RDEIR 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 54 of the Fire Protection Plan [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 RDEIR, the more accurate and true statement is: The project proposes extensive areas where fuel management zones are less than 100 feet wide. This is a severe design flaw.

The Project appears to rely on other property owners outside the LHR Subdivision boundaries to comply with the 100-foot FMZ requirement.

The proposed Project FPP does not meet several basic requirements. None of the four fire station site options proposed meet the minimum acceptance criteria of the Deer Springs Fire Protection District (DSFPD). The Project’s FPP has compliance issues with the DSFPD Ordinance No. 2010-01, the County of San Diego Consolidated Fire Code, and the County of San Diego Public and Private Road Standards. The FPP focuses nearly exclusively on Wildfire Management and does not sufficiently address either Structure Fires or Emergency Medical Service (EMS). The FPP doesn’t adequately address and analyze the Environmental Impact of the use of six electronic road gates on fire access roads.

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 has not 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.

D. Significant Irreversible Environmental Changes Resultant From Project Implementation

The proposed Project 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. Why would the County risk upsetting the entire General Plan, not to mention the Community Plans, by acceding to the wishes of the developer to amend those plans to suit this Project?

The RDEIR 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. If the County needed the additional equivalent dwelling units [EDU] to meet housing goals for build-out of the General Plan, such expenditures of energy and materials would be

more understandable. But, since the additional EDUs are not needed, why would the County approve of what amounts to a waste of resources?

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 for future production. Another is the loss of significant amounts of biological habitat and the flora and fauna that presently occupy them. The RDEIR 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. Why are such losses necessary when alternatives that have dramatically less environmental impact are available to achieve the Project's myopic objectives?

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.

E. Water Quality/Hydrology

Off-site routes for recycled water and sewer pipelines have been found to lack sufficient legal right-of-way easements as represented in figure 3.1-8, "Off-site Sewer Collection System." 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 General Plan policy COS-5.2 which requires development to minimize the use of impervious surfaces.

E. Geology and Supplemental Geology Report

The review identifies questions regarding the need for blasting for cuts that exceed 50-feet in depth to facilitate the movement of over 4-Million cubic yards of dirt and rock. Given the phasing of the project, Silicates will be a potential hazard relative to the AQMD standards for a period of as much as 10-years or even longer.

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.

6. Project Alternatives

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

1. The RDEIR 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 RDEIR by the County.
6. When all nine Alternatives are fairly assessed, the Downtown Escondido SPA meets more Objectives than the Project or any other Alternatives.

The General Plan alternative must be properly considered by the applicants and the 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 \$18.6 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.

7. Specific Plan

The comments on the Specific Plan include several major concerns:

A. 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.

B. 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. Several Mobility Element Road segments associated with the Project will be allowed to sink to LOS E/F without mitigation because there wouldn't be commensurate benefit realized by adding lanes.

C. 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, over \$18 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 this 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.

D. Services and Infrastructure - Water, Schools, Fire, Wastewater 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.

E. 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 “designed 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.

F. 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 sensitive 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 businesses.

G. 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 four 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 a concept rather than a specific 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 D special area regulations to circulation elements. There are too many to reasonably relate in this summary. An indication of the severity of impact this Project has on the project site is provided by the sheer volume of significant impacts, mitigable or not, listed in the table S-1 of the RDEIR Executive Summary, *Summary Of Significant Effects And Mitigation Measures To Reduce The Effects*. A project, plagued by so many issues that will have such a drastic impact on the communities of Valley Center and Bonsall, not to mention the region of north San Diego County, should not proceed any farther toward approval.