

JAMES CHAGALA & ASSOCIATES
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December 27, 2017

Ben Mills, Project Manager
San Diego County Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: PDS2015-STP-15-022
Rite Aid

Dear: Mr. Mills:

I represent the owners of the Weston Town Center, and would like to record our objections regarding the above referenced development now out for public comment. The Rite Aid project has been unanimously denied at the Valley Center Design Review Board, unanimously recommended for denial by the North Village Subcommittee, and recommended for denial by the Valley Center Community Planning Group by a vote of 14-1.

General Plan Conformance:

Although the staff explanations in the public record repeatedly state that this project is consistent with the County General Plan, this clearly is not the case.

Land Use, Commercial Goals, Policy 2 of the Valley Center Community Plan states:

2. Require new commercial development to comply with the Design Guidelines for Valley Center, including, but not limited to, the retention of significant natural features characteristic of the community's landscape. Existing topography, land forms, drainage courses, rock outcroppings, vegetation and watershed shall be incorporated in the design of the future development of commercial land via the "B" Community Design Area. [PP].

Please note that while line 2 indicates "including, but not limited to, the retention of significant natural features characteristic of the community's natural landscape", nothing in this phrase limits the application of the Design Guidelines to these features but clarifies that these features are to be "included, but not limited to" in the review for compliance with the Design Guidelines.

This project clearly does not meet the Valley Center Design Guidelines. This was the reason for the Valley Center Design Review Board's unanimous denial of the Rite Aid project recommendation and was a major factor in the unanimous recommendation for denial by the North Village Subcommittee and the 14-1 vote by the Valley Center Planning Group. At both the Design Review Board and the North Village Subcommittee the proponents were given several opportunities to revise their plan to meet the guidelines but did not do so.

The Rite Aid Site Plan has the following violations of the Design Review Guidelines.

1. The Guidelines require a 20 foot landscape edge zone along the front of the property (page 53,C).

This project proposes a 10 foot landscape edge zone along Valley Center Road and a 5 foot edge zone along Cole Grade Road.

2. The Guidelines require, for single building developments, that parking not be permitted between the front or side street of a building or side street. Parking areas must be setback 20 feet from front and side property lines and fully screened from street view.

This project has parking between the buildings, and both the front and side streets. In addition, parking areas are setback between 7 feet 6 inches and 14 feet from the west and north property lines.

Therefore, since the Guidelines have not been complied with, pursuant to Policy 2 quoted above, approval of this project is not consistent with the Valley Center Community Plan Text and thereby the County General Plan.

I have included a letter from Attorney David Ferguson citing additional reasons that this project does not conform to the Valley Center Community Plan and thereby the San Diego County General Plan.

Impact on the effectiveness of the Design Guidelines:

1. The underlying issue is that the building proposed of 11,900 Square Feet is too large to fit on this lot and meet dedications, setbacks, and the Design Guidelines. Architects have reviewed this site and concluded that to meet County requirements, a building no larger than 7,500 Square Feet would fit on this site. Proposals should be designed to conform to the Guidelines, and not expect to have the guidelines adjusted to meet the wishes of the proponents through exceptions. This would essentially render the Guidelines useless.
2. It would be unfair to the other developers in Valley Center whose projects have been designed to meet the Design Guidelines.
3. It would set a bad precedent. Once the County start granting exceptions to the extent Required in this case, especially over the objections of the community, it will set a precedent that other developers will expect for their projects. Again this will render the Guidelines useless.

Traffic Report:

The traffic report submitted by this project has been reviewed by Darnell and Associates and the comments have also been included.

Thank you for opportunity to comment.

Respectfully submitted,

James Chagala

James Chagala, Ph.D.
Principal

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December 27, 2017

Ben Mills, Project Manager
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San Diego, CA 92123

Re: PDS2015-STP-15-022
Rite Aid

Dear Mr. Mills:

This letter is submitted on behalf of Weston Communities in response to the proposed development of the Rite Aid store on the southeast quadrant of the intersection of Valley Center and Cole Grade Roads (APN 188-250-19). This Project should not be approved due to its inconsistency with the adopted Valley Center Community Plan ("VCCP") and Valley Center Design Guidelines ("VCDG).

The 1990 VCDG established the Valley Center Town Center ("VCTC") which would be a commercial hub for the region. Section 1.C of the VCGD states that "the concentration of commercial development and existing civic facilities ... will eventually become Valley Center's Town Center. The Town Center area should be distinct from other sections of Valley Center Road, approximating the character of a traditional town center. It should provide an opportunity for pedestrian activity that would link shops and commercial services, the nearby schools and park, and other civic facilities." It is clear that the intent of the VCTC was to create a vibrant village area with ample pedestrian opportunities by concentrating larger commercial projects in the Town Center, rather than having them sprawled along Valley Center Road.

In 2011, the VCCP was adopted with the goal of "[T]wo economically viable and socially vibrant villages where dense residential uses, as well as commercial and industrial uses, are contained". While the VCCP does not specifically reference the VCTC, it does state that all new development must comply with the VCDG. The VCDG clearly require that the Town Center be the major commercial area, indicating that the second center should be a smaller subordinate hub.

The location of a Rite Aid Drug Store on Parcel 188-250-19 as currently proposed would be inconsistent with the intent, guidelines, and policies of both the VCDG and the VCCP for three primary reasons:

1. The 53,000 s.f. site is too small to support a pedestrian-oriented environment with walkways, arcades, plazas and courtyards as required by Chapter 13 of the VCDG.
2. The site is too isolated to link separate buildings and arrange them in compact "clusters". Development of the site with a single user with access from the major through road will be tantamount to strip development, which is prohibited under Policy #5 of the VCCP.
3. Placement of an anchor tenant on this small and isolated site will preclude the development of a multi-tenant, pedestrian oriented, town center in the VCTC as intended by the VCDG and VCCP.

A Town Center containing the elements described in the General Plan and VCDG would require the presence of both a major drug store and a major grocery store. A marketing study done by Area Research Associates (ARA) dated October 14, 2014 shows that there will be sufficient population in Valley Center to support only one supermarket and one super drug store in Valley Center until approximately 2026.

The site of the proposed Rite Aid, at 1.2 acres, is not large enough to also support a grocery store or any other commercial elements of a Town Center as described in the General Plan or the VCDG. Based on the ARA report, approval of the isolated Rite Aid would essentially mean that there could not be a true Town Center constructed in Valley Center for the next 12 years. Accordingly, approval of the Rite Aid project would jeopardize the implementation of the Goals and Policies of the General Plan, the VCCP, and the VCDG.

In conclusion, the proposed project is inconsistent with the goals for the Town Centers because the site is too small and in the wrong location to comply with the General Plan, the VCDG, and the VCCP. The placement of a Rite Aid on Parcel 188-250-19 would preclude the development of a full Town Center on that parcel, or any other in Valley Center. In order to preserve the Village Town Centers envisioned in the VCCP, the proposed project should be denied.

Sincerely,



David W. Ferguson

Darnell & ASSOCIATES, INC.

TRANSPORTATION PLANNING & TRAFFIC ENGINEERING

December 22, 2017

James Chagala
James Chagala & Associates
10324 Meadow Glen Way East, Suite 2A
Lake Forest, CA 92630

D&A Ref. No: 150205

Subject: Review of the Valley Center Rite Aid project Traffic Impact Study.

Dear Mr. Chagala:

In accordance with your authorization, Darnell & Associates, Inc. (D&A), I have reviewed the subject Traffic Impact Study dated September 2017 prepared by Dawn Wilson. My review of the report has been made for conformance to the County of San Diego Traffic Study requirements. I have the following comments based on review of the subject document,

1. The Traffic Study needs to be signed and stamped by a registered Civil and/or Traffic Engineer.
2. The Traffic Study on Page 1, Table 1-1 identifies existing traffic volumes on the surrounding streets. However the report does not identify the date of the counts and/or provide a copy of the count summaries in Appendix A.
3. Table 1-1 classifies Valley Center Road East of Cole Grade Road as a Light Collector (2.2B) roadway with an existing 16,620 ADT and project traffic of 134 daily trips. This analysis is correct for this segment of Valley Center Road between Cole Grade between Cole Grade Road and Lizard Rocks Road.

Table 1-1 needs to be revised and expanded to analyze the project impact on Valley Center Road East of Lizard Rocks Road that is constructed and striped as a Light Collector (2.2E) roadway with a capacity of 16,200 ADT. Based on the 16,200 ADT reported in Table 1-1 Valley Center Road East of Lizard Rocks Road would operate at LOS "F" and 134 project daily trips would exceed the allowable 100 ADT exemption and require mitigation.

4. The Traffic Study also needs to address the spacing of the projects driveways for conformance to the County of San Diego Public Road Design Standards, Section 6.1 C for a minimum distance between non-mobility roads entering Mobility Element Roads.

In summary the subject Traffic Study needs to be revised and copies of the missing traffic count data needs to be provided, location of driveways need to conform to the County of San Diego Public Roads Standards 6.1C and mitigation of the project impacts to Valley Center Road East of Lizard Rocks Road needs to be completed.

James Chagala
James Chagala & Associates
December 22, 2017
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If you have any questions, please feel free to contact this office.

Sincerely,

DARNELL & ASSOCIATES, INC.



Bill E Darnell, P.E.
Firm Principal
RCE 22338

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Rite Aid Traffic Study Review.docx



Date Signed: 12-22-17