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LATHAM & WATKINS LLP

July 23, 2014

VIA EMAIL AND U.S. MAIL

Mark Wardlaw, Director
County of San Diego
Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, California 92123

Re: Draft Revised Environmental Impact Report for the Lilac Hills Ranch Project

Dear Mr. Wardlaw:

Latham & Watkins LLP represents the Golden Door Properties LLC (the “Golden Door”) on land use and environmental matters. The Golden Door is an award-winning spa and resort that opened in 1958. This historic haven is situated on approximately 600 acres on the south side of Deer Springs Road in northern San Diego County (“North County”). The Golden Door focuses on the health and fitness of its guests, and its property encompasses a peaceful array of hiking trails, luxurious spa amenities, tranquil Japanese gardens, and a bamboo forest. Agricultural cultivation on the property includes fresh vegetable gardens as well as citrus and olive trees.

The Golden Door is devoted to the holistic of health of not only its guests, but its community in the Bonsall and Twin Oaks areas, throughout the Interstate 15 corridor in North County, and across San Diego County (the “County”). In addition, the Golden Door is concerned about the impacts of climate change and is supportive of California’s efforts to curb greenhouse gas (“GHG”) emissions through the requirements of AB 32 and the smart planning principles of SB 375.

The Golden Door is concerned about: (1) the Lilac Hills Ranch project’s (the “Project”) impacts to Interstate 15 and Deer Springs Road, (2) the piecemeal precedent it sets for County consideration of the conversion of rural land to new urban uses in the Interstate 15 North corridor, and (3) the accuracy of the cumulative impact traffic information in the EIR for the Project concerning the revived Merriam Mountains Project, another new urban project proposed for this corridor.

The Golden Door is largely dependent on Interstate 15 for its guests’ and employees’ transportation. In addition, Deer Springs Road often functions as a regional cut-through from Interstate 15 to SR-78 causing increased traffic on surface streets due to congestion on the

freeways. The Golden Door considers mitigation of cumulative impacts to Interstate 15 to be integral to regional vibrancy and believes regional transportation planning should seek to eliminate cut-through traffic on Deer Springs Road by keeping freeway-to-freeway trips on the freeways.

Unfortunately, the County, Caltrans, and SANDAG do not appear to be considering the cumulative impact of all the newly proposed development projects on these transportation facilities. In fact, each agency appears to be proceeding in its own separate direction in planning for cumulative development (apparently based on the erroneous belief that the County intended to follow its adopted General Plan), and the only opportunity for formal public comment appears to be this Draft Revised Environmental Impact Report (“EIR”) prepared by the County which examines “cumulative impacts.” The County staff’s approach thus far in this Draft Revised EIR appears to be that individual developments can or should go forward without any defined contribution to cumulative transportation impacts on the Interstate 15 corridor and surface streets which will suffer from “cut-through traffic” from motorist fleeing the Level of Service “F” congestion the County is now planning for this freeway.

The Golden Door takes no position on the Project, other than to request that the County ensure that the Project provide for full mitigation of any additional traffic the Project adds to Interstate 15 at Deer Springs Road, given the County’s prediction of Level of Service “F” at this location. Our comments are also based on the Golden Door’s position of responsible corporate citizenship and its commitment to sustainable development. It may very well be that the Lilac Hills Ranch project can provide the missing full mitigation for its contribution to traffic impacts described in the Draft Revised EIR, either by some combination of defined and funded expanded transit services to link to the SANDAG system, expansion of the freeway mainline, construction of expanded bus rapid transit (“BRT”) lanes, or expanded park and ride facilities. It will be important to revise the Draft Revised EIR to provide for full funding of these improvements in advance by the agencies or the developers, and to ensure that the improvements are in place before development occurs.

This Draft Revised EIR indicates that the County staff have apparently elected to proceed with planning for urban development along the Interstate 15 corridor in North County on a project-by-project basis, rather than as a regional amendment to the General Plan or SANDAG’s Regional Transportation Plan (“RTP”) and Sustainable Communities Strategy (“SCS”) for all of the planned projects. As a result, this single project EIR provides the public with the public’s first and only look at cumulative traffic for this region. This includes the cumulative traffic from the Newland Real Estate Group, LLC’s (“Newland”) revived Merriam Mountains Project, whose impacts are “buried” in the Project’s Draft Revised EIR and traffic study. (While Newland has not filed a formal application with the County, we are concerned that this traffic information in the County’s EIR may not include all of Newland’s announced plans for urban development of its property, including a new regional commercial center, school, and other uses as detailed in the attached Union Tribune article of July 20, 2014.) Thus, rather than being able to comment on a proposed regional General Plan amendment, or proposed amendment to the RTP or the SCS, the Golden Door has been forced to provide these comments now, before the expiration of what may be the only public comment period on these cumulative impact issues.

While these comments are grounded in issues identified in the Project's Draft Revised EIR, we intend for them to apply more broadly to development on rural County land along the Interstate 15 corridor in North County, such as the revived Merriam Mountains project. We encourage the County to consider these comments before taking additional action on the Project and in its general planning activities. The following discussion addresses the Golden Door's concerns.

A. If the General Plan Is to Be Changed in this Region, the County Must Provide for Full Mitigation of Cumulative Impacts to Interstate 15 Causing or Contributing to the Predicted Level of Service "F" from SR-78 to Riverside County

The Draft Revised EIR's cumulative impacts analysis for traffic is based on SANDAG's Series 12 Year 2020 Transportation Model and evaluates the impacts from projects within a seven-mile radius. This analysis demonstrates cumulative impacts creating a Level of Service "F" on Interstate 15 from SR-78 all the way to Riverside County. The Project's Draft Revised EIR discloses that both the Project and the planned revived Merriam Mountains Project will add an additional approximately 10 percent to the segment of Interstate 15 south of Deer Springs Road, which is projected to be at Level of Service "F" during peak hour when traffic from these two projects (plus other cumulative projects) is added. The Draft Revised EIR, however, states that the significant cumulative impacts to this stretch of Interstate 15 are unavoidable and no mitigation is available because of the lack of a Caltrans project into which the County could pay fair share fees. Moreover, commuters from Riverside County threaten to add even more trips to this stretch of Interstate 15, which may not be encompassed by the seven-mile radius for analysis.

In its discussion of mitigation, the Draft Revised EIR fails to consider how interchange improvements, freeway mainline widening, expansion of SANDAG's BRT service further north on the Interstate 15 corridor, or fully and permanently funded frequent transit service by this development project could mitigate these impacts. In situations where a developer is adding substantially to significant adverse impacts, it is appropriate under the California Environmental Quality Act ("CEQA") to consider whether the developer could or should finance all of the improvements to mitigate that impact, or whether there are County or regional funds available to build these mitigation improvements before the development is allowed to go forward. Simply considering a single "fair share" payment that will not actually build facilities, and then rejecting it due to the institutional inability of one agency to hold the funds for a period of time, does not appear to be an adequate discussion of mitigation under CEQA. For example, why can't the County or SANDAG hold developer funds and ensure that needed Interstate 15 transportation improvements are built, before the County goes forward with allowing additional development?

Recent improvements to Interstate 15 include a BRT system, direct access ramps, improved transit centers, and new express lanes. These improvements, however, do not extend north of SR-78. The revenue constrained scenario of SANDAG's RTP notes that a project for peak hour BRT from Temecula to downtown San Diego, connecting through Escondido, is scheduled for 2018. Moreover, the constrained scenario of the RTP indicates plans for four toll lanes extending north of SR-78 on Interstate 15 by 2050. In addition, the North County Transit

District's ("NCTD") existing bus route 388/389 and Riverside Transit Agency's ("RTA") existing bus route 217 run along the Interstate 15 corridor in North County but do not include stops between SR-78 and SR-76. Unfortunately, none of these improvements appear to provide for "stops" or "access" to the Project.

If the County were to decide that new urban development along the Interstate 15 corridor in North County is appropriate, the County should work with SANDAG, Caltrans, NCTD, RTA, and the San Diego Metropolitan Transit System to amend their transportation and growth management plans to ensure such new development contributes to expanded BRT options and additional managed lanes, transit centers, bus stops, and improved park and ride facilities to mitigate cumulative traffic impacts. The County should also consider whether amendments are needed to its Transportation Impact Fee program before it makes these changes to its General Plan.

If the County were to change its regional growth planning and convert rural land to additional urban development in this corridor, the County should encourage SANDAG and Caltrans to accelerate and expand planned projects on Interstate 15 in North County before new development, (such as the Lilac Hills Ranch project and the newly revived Merriam Mountains Project now included in the County's latest EIR, both of which increase density above levels contemplated in the SANDAG RTP) are allowed to proceed. With the impacts of the Project, the revived Merriam Mountains Project, and other cumulative projects, the traffic situation on Interstate 15 in North County will devolve into an unmanageable situation with Level of Service "F" as the County's EIR predicts.

Having this major freeway corridor at gridlock due to new development which would prevent fire evacuations along this key north south corridor should be completely unacceptable to everyone. Before making the decision regarding whether to amend regional growth and transportation plans, the County, SANDAG, and Caltrans should use the opportunity to determine whether they can provide transportation facilities to provide this crucial health and safety protection. Unfortunately, the Lilac Hills Ranch EIR prepared by the County simply predicts this dangerous situation of Level of Service "F," and then "throws up its hands" and does not even consider requiring developers adding trips to the freeway from their projects to provide facilities to prevent this predicted dangerous gridlock.

B. The Project Must Comply with Applicable Planning Documents

The RTP is a regional blueprint for a transportation system that meets the State's sustainable development planning priorities through 2050. It allocates funding across transportation priorities, including transit, highway improvements (consisting largely of HOV lane additions), and local roads. SB 375, which went into effect in 2009, requires that a SCS be prepared as part of the RTP to integrate land use and transportation planning in an effort to curb vehicle miles traveled and associated GHG emissions. SANDAG published its RTP/SCS in October 2011. SANDAG's SCS notes the following:

The path toward living more sustainably is clear: focus housing and job growth in urbanized areas where there is existing and

planned transportation infrastructure, protect sensitive habitat and open space, invest in a transportation network that provides residents and workers with transportation options that reduce GHG emissions, and implement the plan through incentives and collaboration.

SANDAG 2050 Regional Transportation Plan (Oct. 2011) at 3-2. It is important that new development along the Interstate 15 corridor in North County adhere to these smart growth principles and comply with the RTP/SCS. Because the Interstate 15 corridor in North County is not urbanized and lacks existing transit infrastructure, new development should consist of “transit-first” or even “transit-obligate” communities that make significant contributions to accelerating and expanding planned transit facilities and to creating a robust network of new transit opportunities.

The RTP/SCS is based on SANDAG’s 2050 Regional Growth Forecast which bases its growth forecast through 2030 on adopted land use plans. *Id.* at 3-8 to 3-9. The County’s recently updated General Plan designates much of the land along the Interstate 15 corridor in North County as rural or semi-rural, including a semi-rural designation for the Project site.

In addition, local planning documents emphasize the need for smart growth to reduce the GHG emissions associated with single-occupancy automobile-dependent development. The County General Plan embraces smart-growth communities and a multi-modal mass transit system, stating that “[t]he General Plan will reduce GHG emissions primarily through minimizing vehicle trips and approving land use patterns that support increased density in areas where there is infrastructure to support it, increased opportunities for transit, pedestrians, and bicycles, and through green building and land development conservation initiatives.” San Diego County General Plan at 1-16 (Aug. 2011).

The Draft Revised EIR states that the Project would not conflict with the RTP/SCS. Appendix O at 83. Appendix O notes that the Project is located one-quarter mile from Interstate 15, which is a designated transit corridor. It does not, however, disclose information regarding access to transit on Interstate 15, including the location of any existing or planned transit stations. The Draft Revised EIR should specifically describe access to transit and transit corridors in detailing its RTP/SCS compliance. The Draft Revised EIR should further note what portion of the Project site is located within one-quarter mile of the Interstate 15 transit corridor and the distance to existing and planned transit facilities.

The Draft Revised EIR notes the inclusion of interim private transit service and planned mass transit to the Project as well as the location of a park and ride facility at Gopher Canyon Road and Old Highway 395. The Draft Revised EIR should provide additional information describing the timeline for implementing mass transit and installing a transit stop and details regarding any efforts to improve or add park and ride facilities. For example, the Draft Revised EIR does not contain any details about how the developer will fund this “private transit” on a permanent basis, whether the transit service will be operating at the same time that new units are occupied, the frequency of service of this transit, the destination of this transit, or whether any consultant actually predicts that residents of the new development will use this transit service,

given frequency of service, accessibility, and travel times. For example, will the private transit connect with SANDAG's transit centers in Escondido and Sabre Springs which allow connections to other services in the SANDAG transit system? In addition, the Draft Revised EIR should analyze any improvements at the park and ride planned by the developer, as well as whether there is sufficient parking capacity now or in the future at this location.

Finally, the Draft Revised EIR notes that the mitigated Project would achieve vehicle emissions reductions of 14.8 percent in 2020 and 14.6 percent in 2035 when compared to the unmitigated project. It does not, however, account for the density increase over the land use plans on which SANDAG based its RTP/SCS forecasts. The Draft Revised EIR states that "vehicle emissions were modeled in CalEEMod for the proposed projects land uses and include the same vehicles classes as those used in the SCS and to derive the SB 375 targets." Appendix O at 83. By basing this analysis on the "proposed projects land uses," the Draft Revised EIR presumes a higher density than that used for the RTP/SCS forecasts. It is unclear, then, how the measurement of vehicle emissions reductions for an increased density project is not inconsistent with the RTP/SCS, which was based on lower density development in the area. Consequently, further analysis is required to determine RTP/SCS compliance.

From our conversations with SANDAG staff, we believe that a key assumption of the adopted RTP/SCS for the San Diego Region was that there would not be expanded urban development up and down the Interstate 15 corridor in North County. As a result, they did not provide for the extension of BRT or other transit service to this area. We ask that the County consult with SANDAG staff prior to reaching any conclusion of "consistency" with SANDAG's adopted plans, which were based on the existing rural development along Interstate 15 in North County and did not consider all the newly proposed urban projects on this corridor.

C. The County Should Analyze the Project's Traffic Impacts to Deer Springs Road

As noted above, the Golden Door is particularly concerned with cut-through traffic on Deer Springs Road traveling between Interstate 15 and SR-78 that seeks to find a way through San Marcos' limited surface streets to avoid, at peak hour, the gridlocked Interstate 15/SR-78 Interchange and congested SR-78 headed west bound. At the present time, the Golden Door believes the large majority of traffic on Deer Springs Road are drivers from out of the area seeking a faster or shorter way around the congested Interstate 15/SR-78 interchange.

With the County's projection in its Draft Revised EIR that Interstate 15 will reach Level of Service "F" and be extremely congested for many hours of the day, (and with the Lilac Hills Ranch and revived Merriam Mountains Project contributing approximately 10 percent of the additional traffic to Interstate 15 at Deer Spring Road), many more motorists will be encouraged to "flee the freeway" and find any surface street that can provide an alternative. (We believe that Newland is studying the existing Deer Springs Road cut-through traffic at this time for its revived Merriam Mountains project, and may have more information to provide to the County on this point.) Simply put, this County EIR's prediction for the future seems to be recipe for driving a high volume of traffic off the 15 to cut through Deer Springs Road and the City of San

Marcos, since at LOS “F,” Interstate 15 will be impassable under the County’s projections for traffic.

The Project’s Traffic Impact Study’s (“TIS”) analysis methodology states that it analyzes all roadway segments for which the Project adds 50 or more peak hour trips, County Mobility Element roadways or intersections for which the Project adds 25 or more peak hour trips, and freeway entrance and exit ramps where the Project will add a significant number of trips or cause traffic queues. Appendix E at 16. The Draft Revised EIR and accompanying TIS do not evaluate traffic impacts to Deer Springs Road or impacts at the Deer Springs Road/Interstate 15 interchange, even though this will probably be a significant additional traffic impact. We believe that the County has mistakenly concluded that the Project will contribute less than 50 peak hour trips to Deer Springs Road, and less than 25 peak hour trips to Deer Springs Road/Mesa Rock Road and other intersections by failing to consider this “cut-through” traffic and model traffic on a regional basis under LOS “F” conditions. Before proceeding further with this Draft Revised EIR, the TIS study area should be expanded to consider these impacts on Deer Springs Road as an alternate “desperation” route caused by increased congestion on Interstate 15. There are a variety of traffic methodologies available for this type of analysis, and our own traffic consultants can provide them to County staff if necessary.

Because of the complex relationship of Deer Springs Road to impacted traffic on Interstate 15, the Draft Revised EIR should evaluate impacts on Deer Springs Road or explain how it was determined that the Project would not add 25 or more peak hour trips to Deer Springs Road or its intersections and how it was determined that the Project would not cause a significant number of trips or cause traffic queues at the Deer Springs Road/Interstate 15 interchange. The County’s TIS should clearly account for both Project and cumulative cut-through traffic between Interstate 15 and SR-78 using Deer Springs Road in its analysis, since this seems to be the only means by which the County can assess these regional and cumulative effects as it proceeds to consider major revisions to its General Plan for the extension of multiple urban developments in the Interstate 15 corridor in North County on a project-by-project basis.

D. The Draft Revised EIR Should Describe the Data and Methodology Used to Analyze Cumulative Traffic Impacts from the Revived Merriam Mountains Project

The TIS evaluates the “Sierra” Project as a 2,100 residential unit project with a small amount of commercial development. Appendix E at 229. The “Sierra” Project by Newland is a revival of the Merriam Mountains Project that was rejected by the County Board of Supervisors in 2010. Because the renewed Merriam Mountains Project would be located just across Deer Springs Road, the Golden Door has been following it closely. We are not sure what, if anything, has been changed to address the concerns of the Supervisors who voted to reject the project. The Golden Door opposed the original Merriam Mountains Project, and to date we have seen nothing from Newland that corrects or improves that proposed project; consequently, the Golden Door continues to oppose it.

It is our understanding that Newland has yet to file an application for the project, though it has chosen to hold public meetings this week to present its project to the community as

described in the attached Union Tribune news article. Unfortunately, while Newland has announced that it has revived the Merriam Mountains Project, it has not provided any traffic information to the public to confirm whether or not the traffic data given to the County for the County's Lilac Hills Ranch Draft Revised EIR matches the newly revived Merriam Mountains Project now announced to the public.

The County's TIS included in this Draft Revised EIR should describe the traffic data and methodology used by County staff to analyze cumulative impacts from the revived Merriam Mountains/"Sierra" Project. The TIS should also account for any regional trips to any retail stores, schools, or other amenities that would be included as part of the revived Merriam Mountains/"Sierra" Project, not just trips from the planned 2,100 housing units. As described in the attached news article, Newland appears to be planning a regional shopping center to serve the Twin Oaks area and the broader Interstate 15 corridor in North County as part of its project.

In conclusion, we encourage the County to consider each of the above-stated concerns in conducting environmental review of this Project. Unfortunately, this seems to be the only method available for the County to consider the cumulative impact of multiple amendments to its General Plan to allow this Project and the revived Merriam Mountains Project to convert rural land to expanded urban development up and down the Interstate 15 corridor in North County, in conflict with SANDAG's adopted RTP and SCS plans.

Sincerely,

Christopher Garrett

Christopher W. Garrett
of LATHAM & WATKINS LLP

Enclosure

cc: Kathy Van Ness, Golden Door
Jeff Dawson, Golden Door
Stephanie Saathoff, Clay Co.
Maddy Kilkenny, Clay Co.
Mark Slovick, County of San Diego
Jacob Armstrong, Caltrans
Michael Pickford, Caltrans
Charles "Muggs" Stoll, SANDAG
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DEER SPRINGS AREA AGAIN SITE FOR LARGE PROPOSED DEVELOPMENT

Merriam Mountains plan in same spot rejected in 2010; workshops set for this week

By [Teri Figueroa \(/staff/teri-figueroa/\)](#) 5:05 a.m. July 20, 2014

More than four years after the county narrowly rejected the proposed Merriam Mountains master-planned community north of San Marcos, a different developer is introducing a slimmed-down plan to build more than 2,100 homes at the rural site.

The new proposal would have 20 percent fewer homes than the earlier version, but will likely face the same opposition from residents concerned about traffic, fire protection, water and the impact on the rural character of the area.

The developer, San Diego-based Newland Real Estate Group, is holding two public workshops this week — one Tuesday and a repeat on Wednesday — in San Marcos to reach out to the community about the project.

“We are very excited to share our plan with the public and get their input,” Newland Senior Vice President Rita Brandin said Friday.

Brandin said the proposed project “protects the rural character of the area,” but will also provide needed amenities — including a school and grocery store — and feature one of the largest privately created preserves in the county.

The new master-planned project is unnamed; the working title is Newland Sierra. It’s at the same spot as the huge Merriam Mountains proposal that was derailed in early 2010 when the county board of supervisors rejected it, 3-2.

The Newland plan is still in the early stages — nothing is on file with the county planners yet. It differs from the Merriam Mountains plan in several ways:

- The old project pitched about 2,630 residences; the new one envisions about 2,135 homes.
- The old plan called for about 110,000 square feet of commercial uses and a fire station. The new project sets aside 81,000 square feet for commercial uses, such as a grocery store, and swaps out the fire station for a school.
- Both projects included about 1,200 acres for a preserve. That’s about the footprint of Balboa Park, including the zoo.
- The Merriam Mountains plan encompassed more than 2,300 acres. The new version is about 1,983 acres, and only 380 acres would be developed. That land is all on the south side of the project; the northern end would be set aside as the preserve.

Newland’s project would include about 6.5 miles of trails and eight parks, including one that’s about 6 acres.

About 64 percent of the houses would be single-family homes; the rest would be townhomes. There are no apartments or condos in the project.

The developer has already reached out to some people who opposed the Merriam Mountains project, and has encountered much of the same reaction.

“I frankly don’t know anyone who is happy,” said 85-year-old Joan Van Ingen, a Champagne Village resident.

A former board member of the Deer Springs Fire Protection District, Van Ingen said her neighbors fear the impact on traffic in case a wildfire forces evacuations in the area.

On the south side of Deer Springs Road sits the Golden Door resort and spa, which lobbied against the Merriam Mountains project. Chief Operating Officer Kathy Van Ness said in an email Friday that the company is committed to the preservation and sustainability of its property, and “will continue to be vigilant about anything that is proposed.”

“We are very concerned about what thousands of new residents in this area would mean to the unique community character here, as well as the impacts on resources,” Van Ness said.

Not everyone is against the project. Longtime North County resident Kelly Crews said she would welcome the development — and the grocery store it could bring.

"I understand that there is going to be impact, and I want that stuff to be addressed, but I am looking forward to it," said Crews, who has lived on the north end of Twin Oaks Valley Road for about five years.

Brandin said the company is addressing the concerns head-on, working with fire, water and transportation officials.

She also noted that the project includes large swaths of cleared defensible space surrounding each community.

There are also talks tackling traffic congestion, and discussions about improvements to streets in the area, including those leading toward the project.

Newland Real Estate Group acquired the property in 2011, along with North America Sekisui House, or NASH, a subsidiary of Japan's largest homebuilder. The land was part of a portfolio of 28 master-planned communities in 15 markets in 11 states that the two entities acquired. Newland's 4S Ranch and Torrey Hills in Carmel Valley were also part of the purchase.

Although no formal application is filed with the county yet, a county spokesman said planners have met with the developer to discuss general issues that could come up for review.

Brandin said the soonest Newland will file a formal application is January, with a slim chance that the project could come before the board of supervisors at the end of 2016. The soonest the first home would go up would be 2020.

The rural Interstate 15 corridor north of Escondido is looking at another large development, this one proposed on the east side of the freeway. The Lilac Hills Ranch project would see more than 1,700 homes built in a 608-acre project in the westernmost portion of Valley Center, about two miles east of Interstate 15 and Old Highway 395.

Brandin is hoping people will look anew at the Newland proposal, and not think of it as a sort of Merriam Mountains 2.0.

"That was a different time," Brandin said, "and a different plan."

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