



LEAGUE OF WOMEN VOTERS OF SAN DIEGO COUNTY

July 28, 2014 Statement by the League of Women Voters of San Diego County

To: San Diego County Department of Planning and Development Services

Attention: Mark Slovick

Re: Lilac Hills Ranch Draft Revised EIR (REIR)

The League of Women Voters has commented throughout the evolution of the General Plan, supporting principles of compact growth, enforcement of fire-safe development, and identifying and safeguarding valuable agricultural land, a limited resource. We promote conservation and preservation of critical natural resources. Our Land Use position supports minimizing urban sprawl and maintaining established patterns of growth and community identity by allowing self-determination in community planning and decision making. We review major development projects with regional impacts, including environmental analysis, for consistency with comprehensive and regional infrastructure plans. Land use decisions should relate to and protect the overall quality of the environment while minimizing additional motor vehicle traffic.

Similarly, the County's General Plan incorporates smart growth and land planning principles intended to reduce vehicle miles traveled, thus reducing greenhouse gases, by locating future development within and near existing infrastructure. Whereas, the REIR traffic study indicates significant and unavoidable impacts on Interstate 15 from Riverside County to State Route 78.

The Lilac Hills Ranch proposed mixed-use residential and commercial land uses, consisting of 1,746 dwelling units on 608 acres, are not consistent with the existing General Plan Land Use Designations of Semi-Rural and Rural Residential. This requires a General Plan Amendment and changes to the Valley Center and Bonsall Community Plans, which both Planning Groups voted against. This project also seeks to re-zone what is now predominantly agricultural land zoned as "Limited Agriculture" (A70) to Village Residential (VR 2.9) and Village Core (C-5). The REIR indicates that the site is a significant agricultural resource impacted by the significant loss of Important Farmland and 43.8 acres of soils of Prime or Statewide Importance.

The General Plan prohibits leapfrog development, except for new LEED Neighborhood Development (ND) certified Villages. However, a LEED prerequisite stipulates development be sited in a *Smart Location* with existing infrastructure and nearby multimodal public transit, job availability and public services, thus, precluding this project, located 45 miles from San Diego.

The REIR shows significant and unavoidable adverse impacts to visual resources, air quality, and noise. The project site, located in a Wildland Urban Interface area in a moderate to very high Fire Hazard Severity Zone, would be susceptible to wildland fires with only three evacuation routes.

The County's revised conclusion is that this project could result in adverse physical environmental effects due to growth inducement, potentially further impacting visual resources, air quality, biological resources, cultural resources, and noise.

The League of Women Voters of San Diego County believes that this project is not suitable for this location. We urge you to adhere to the principles and guidelines of the General Plan and deny the General Plan Amendment, re-zoning and the Community Plans changes. Thank you.

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