

**RECIRCULATION READER'S GUIDE AND  
DECISION AND EXPLANATION REGARDING RECIRCULATION OF THE  
2018 DRAFT REVISED ENVIRONMENTAL IMPACT REPORT FOR THE  
LILAC HILLS RANCH PROJECT**

This Recirculation Reader's Guide (Guide) is provided to explain changes between the updated Draft Final Environmental Impact Report (2018 DFEIR) and the Draft Final Environmental Impact Report (2015 DFEIR) recommended for approval by the County of San Diego's Planning Commission on September 11, 2015. As detailed below, this Guide is intended to facilitate with the submittal of public comments focused on significant new information pursuant to the California Environmental Quality Act (CEQA) Guidelines, Section 15088.5(a).

CEQA Guidelines, Section 15088.5(a) requires the County of San Diego (County) to recirculate a Draft Environmental Impact Report (DEIR) when significant new information is added to the DEIR after public review, but before certification. Significant new information can include changes in the project or environmental setting, as well as additional data or other information. Section 15088.5 of the CEQA Guidelines states:

"Significant new information" requiring recirculation include, for example, a disclosure showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce impacts to a level of insignificance.
- 3) A feasible project alternative or mitigation measures considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project proponents decline to adopt it.
- 4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines, Section 15088.5(a).

Pursuant to CEQA, if revisions to the DEIR are limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified (CEQA Guidelines Section 15088.5(c)). It has therefore been determined that portions of the Lilac Hills Ranch Project (project) is required to be recirculated to ensure that the public has a meaningful opportunity to comment upon the changes to the DEIR in accordance with CEQA Guidelines Section 15088.5. The following table provides a brief overview of the portions of the 2018 DFEIR included in the recirculation and, therefore, available for public comment. Detailed explanations follow.

**Recirculation of Lilac Hills Ranch DEIR**

Section and/or Technical Report included in the Recirculation	Trigger for Recirculation under CEQA Guidelines	Rationale for Inclusion in Recirculation
<p>Traffic Impact Statement Addendum, LLG (January 2018)</p> <p>DEIR Section 2.3 Transportation/Traffic</p>	<p>CEQA Guidelines, Section 15088.5(a)(1)</p>	<p>Updated traffic counts revealed a change in traffic volumes along a roadway within the project area.. The Traffic Impact Statement Addendum identified new significant direct and cumulative impacts to roadway segments and intersections not previously discussed in the DEIR.</p>
<p>Global Climate Change Analysis, Ldn Consulting (January 2018)</p> <p>DEIR Section 2.9: Global Climate Change</p>	<p>CEQA Guidelines, Sections 15088.5(a)(1) and 15088.5(a)(2)</p>	<p>A supplemental Global Climate Change Analysis was prepared to address greenhouse gas emissions based on new emission regulations and recent judicial decisions and case law. The Global Climate Change Analysis identified significant construction and operational emissions not previously discussed in the DEIR.</p>
<p>Air Quality Technical Memorandum, RECON (January 2018)</p>		<p>The Air Quality Technical Memorandum is included in the recirculation to support the finding that no new significant impacts associated with air quality emissions would result from the updated traffic volumes set forth in the Traffic Impact Statement Addendum.</p>
<p>Noise Technical Memorandum, RECON (January 2018)</p>		<p>The Noise Technical Memorandum is included in the recirculation to support the finding that no new significant impacts associated with noise would result from the updated traffic volumes revealed in the Traffic Impact Statement Addendum.</p>
<p>Global Climate Change Technical Memorandum, Ldn Consulting (January 2018)</p>		<p>The Global Climate Change Technical Memorandum is included in the recirculation to support the finding that no new significant impacts associated with greenhouse gas emissions would result from the updated traffic volumes revealed in the Traffic Impact Statement Addendum.</p>

## **I. BACKGROUND**

The Lilac Hills Ranch Project DEIR was first circulated for public review in July 2013. Thereafter, due to the number of issues raised by commenters, a Revised DEIR dated June 12, 2014 was recirculated for public review from June 12, 2014 through July 28, 2014. All interested persons and organizations had an opportunity during this time to submit their written comments to the County. Responses to comments were prepared and the 2015 DFEIR, along with all associated project entitlements, was presented to the County Planning Commission at three Public Hearings on August 7, 2015, August 12, 2015, and September 11, 2015.

On September 11, 2015, at the recommendation of the County Department of Planning and Development Services, the County Planning Commission recommended approval of the Lilac Hills Ranch Project (project) subject to a number of modifications to the project design as stated in the Planning Commission's recommendations and the County Staff Report. Thereafter, the project was modified to include all recommendations of County staff and Planning Commission.

## **II. 2018 DFEIR: UPDATED TECHNICAL REPORTS**

In preparation of the 2018 DFEIR, the project applicant prepared several new and/or supplemental technical studies in order to determine whether the revised project would result in significant new impacts. These include the following:

- Traffic Impact Study Addendum
- Global Climate Change (GCC) Analysis
- Air Quality Technical Memorandum
- Noise Technical Memorandum
- GCC Technical Memorandum

A discussion of whether there are any new significant impacts triggered by the updated technical reports is discussed in the following paragraphs.

1. Air Quality Technical Memorandum: The Air Quality Technical Memorandum has been prepared to address whether increased traffic volumes on project area roadways would result in changes to the air quality analysis contained in the 2015 DFEIR. Potential impacts associated with the updated traffic volumes and cumulative projects are discussed under Section IV, Updated Environmental Analysis, below. As detailed below, no new significant impacts were identified.
2. Traffic Impact Study Addendum: Traffic counts were updated in 2017 pursuant to the Traffic Impact Study Guidance of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Transportation and Traffic dated August 24, 2011 (Second Modification). In addition, several new development projects are now proposed within the project vicinity that could add cumulative traffic to the project study area intersections and segments. A Traffic Impact Study Addendum was prepared by Linscott, Law & Greenspan, Engineers dated January, 2018 (TIS Addendum). As detailed in the TIS Addendum, new significant direct and cumulative impacts would result from project implementation that had not been identified in the DFEIR-2015.

Impacts associated with the updated traffic volumes and cumulative projects are discussed under IV, Updated Environmental Analysis, below.

3. Noise Technical Memo: The Noise Technical Memorandum has been prepared to address whether increased traffic volumes on project area roadways would result in changes to the noise analysis contained in the 2015 DFEIR. As detailed in the memorandum, there could be new significant impacts on the following road segments: East Dulin Road, between Old Highway 395 and State Route 76; and multiple segments along West Lilac Road between Old Highway 395 and Lilac Road.
  - East Dulin Road, between Old Highway 395 and State Route 76: The Noise Technical Memorandum concludes that although there would be an increase of 1 CNEL compared to the 2015 report, the noise levels at Noise Sensitive Land Uses (NSLU) along this segment would not exceed County standards and impacts would remain less than significant.
  - West Lilac Road between Old Highway 395 and Lilac Road: The Noise Technical Memorandum concludes that no NSLU along this segment would be exposed to a substantial increase in noise levels and impacts would remain less than significant.

Therefore, no new significant impacts were identified.

4. Global Climate Change: A new GCC Analysis was prepared by LDN Consulting (January 2018; 2018 GCC Analysis), which replaces the previous technical report addressing the project's greenhouse gas (GHG) emissions. The 2018 GCC Analysis reflects updated regulations and recent judicial decisions, including those pertaining to the County's Climate Action Plan and the California Supreme Court's *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) decision. The analysis was also updated to estimate the project's GHG emissions utilizing California Emissions Estimator Model (CalEEMod), Version 2016.3.1. As detailed below, new environmental impacts associated with GHG were identified. However, all significant impacts associated with GHG emissions are mitigated to below a level of significance through the project's attainment of a net zero GHG emissions level. The 2018 GCC Analysis recommends the adoption of additional mitigation measures and additional project design features in order for the project to achieve no net increase in GHG emissions. Because the updated 2018 GCC Analysis and conclusions constitute new information not previously available to the public, the 2018 GCC Analysis, along with the updated 2018 FEIR GHG section are included in this recirculation. New significant impacts are discussed under Section IV, Updated Environmental Analysis, below.

The updated project design measures included in the 2018 GCC Analysis and the updated 2018 DFEIR GHG Section are as follows:

- Design all residences to achieve the California Energy Commission's Zero Net Energy standards, as defined in that agency's 2015 Integrated Energy Policy Report.

- Provision of on-site, solar photovoltaic systems on a minimum of 45 percent of non-residential building roof space and on all covered parking areas. This combination of solar coverage locations (i.e., non-residential building roof space and covered parking areas) is estimated to meet approximately 100 percent of the non-residential land uses' demand for electricity.
  - Exclusive utilization of high-efficiency (LED or equivalent) indoor and outdoor lighting in all non-residential buildings.
  - Update the TDM program to include specific strategies for residents, hotel guests, and commercial employees.
  - On-site installation of Level 2 electric vehicle (EV) charging stations as follows: one single-port EV charging station for each of the 1,746 residential units and at least 22 dual-port EV charging stations (serving a total of 44 parking spaces) in parking areas for the non-residential uses, including the recreation center, park, school, senior center and commercial uses located within the project site.
5. Global Climate Change Technical Memorandum: The GCC Technical Memorandum has been prepared to address whether increased traffic volumes on project area roadways would result in changes to the GCC analysis. Potential impacts associated with the updated traffic volumes and cumulative projects are discussed under Section IV, Updated Environmental Analysis, below. As detailed below, no new significant impacts beyond those included in the 2018 GCC Analysis were identified.

### **III. UPDATED ENVIRONMENTAL ANALYSIS**

Each section of the 2015 DFEIR was reviewed to determine whether the updated technical reports detailed above would result in: (1) new significant environmental impacts from the project or from new mitigation measures; (2) a substantial increase in the severity of environmental impacts; (3) feasible project alternatives or mitigation measures considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the project, but which the Project proponents decline to adopt; or (4) that the 2015 DFEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The following subsections detail those subject areas where it was determined that there could be new significant impacts. Each subsection contains a conclusion regarding whether there are new significant impacts.

#### **A. FEIR Section 2.2, Air Quality**

As detailed in the Air Quality Technical Memorandum operational air emissions resulting from updated traffic volumes would actually be less than air emissions estimates from the 2015 Air Quality Report for all pollutants, with the exception of particulate matter with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>), which would increase but still be below County threshold standards. The reduction in air emissions in the wake of

increased traffic volumes is due to the difference in modeling years between the analyses and is a reflection of new regulations taking effect. Therefore, no new significant impacts were identified.

***Conclusion related to Recirculation of Section 2.2, Air Quality:*** Pursuant to CEQA, because no new significant impacts were identified as a result of the increased road volumes (see TIS Addendum), the Air Quality section of the 2018 FEIR is not included in the recirculation. However, the Air Quality Technical Memorandum is included for review and comment.

## **B. Section 2.3, Transportation/Traffic**

The project's traffic counts were updated in 2018 pursuant to the Traffic Impact Study Guidance of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Transportation and Traffic dated August 24, 2011 (Second Modification). Also, several new development projects have been proposed within the project vicinity that could add cumulative traffic to the project study area intersections and segments. Therefore, the TIS Addendum was prepared and details new significant direct and cumulative impacts that would result from project implementation.

As identified in the TIS Addendum, new significant direct impacts were identified to the following road segments:

- Camino del Rey: Old River Road to West Lilac Road
- Valley Center Road: from Cole Grade Road to Vesper Road

Additionally, new significant cumulative impacts were identified at the following intersections:

- SR-76/Old River Road/E. Vista Way
- SR-76/Olive Hill Road /Camino Del Rey
- Old River Road/Camino Del Rey
- West Lilac Road/Camino Del Rey
- Old Highway 395/Camino Del Rey
- Lilac Road/Old Castle Road
- Valley Center Road/Lilac Road
- Cole Grade Road/Valley Center Road

New significant cumulative impacts were identified at the following segments:

- Camino Del Rey: SR-76 to Old River Road
- Old Castle Road: Old Highway 395 to Lilac Road
- Lilac Road: Anthony Road to Betsworth Road
- Lilac Road: Betsworth Road to Valley Center Road
- Valley Center Road: Woods Valley Road to Lilac Road
- Valley Center Road: Lilac Road to Miller Road
- Valley Center Road: Miller Road to Cole Grade Road
- Valley Center Road: Cole Grade Road to Vesper Road
- Old Highway 395: Circle R Drive to Gopher Canyon Road

It is noted, however that the previously identified cumulative impact on the segment of West Lilac Road between Old Highway 395 and Main Street would no longer be significant.

New mitigation measures were proposed in the TIS Addendum to address the newly identified significant impacts. A discussion of the mitigation measures is included in the revised EIR section, as a part of the recirculation. Overall, with the exception of Caltrans facilities, all newly identified significant impacts would be reduced to less than significant levels with the implementation of the proposed mitigation measures.

***Conclusion related to recirculation of Section 2.3, Transportation/Traffic:*** As a result of the findings of the TIS Addendum, the traffic section of the 2018 DFEIR has been updated and included, along with the TIS Addendum, in the recirculation for review and comment.

### **C. Section 2.8, Noise**

As detailed in the Noise Technical Memorandum, noise levels resulting from updated traffic volumes could increase at NSLU location compared to the 2015 Noise Report. As detailed in the memorandum, potentially significant impacts along East Dulin Road, between Old Highway 395 and State Route 76 and West Lilac Road between Old Highway 395 and Lilac Road would not exceed County standards. Therefore, no new significant impacts were identified.

***Conclusion related to Recirculation of Section 2.8, Noise:*** Pursuant to CEQA, because no new significant impacts were identified as a result of the increased road volumes (see TIS Addendum), the Noise section of the 2018 DFEIR is not included in the recirculation. However, the Noise Technical Memorandum is included for review and comment.

### **D. Section 2.9/3.1.2, Greenhouse Gas**

The analysis of project GHG emissions has been moved from Chapter 3.0 (Environmental Effects Found Not to be Significant) to Chapter 2.0 (Significant Environmental Effects of the Proposed Project). Specifically, Section 2.9 supersedes and replaces 2015 DFEIR Section 3.1.2. The updated GHG emissions analysis presented in the 2018 DFEIR incorporates updated information regarding the existing regulatory framework and judicial decisions addressing the consideration of GHG emissions under CEQA, and is based on a more current modeling platform for the estimation of GHG emissions. The analysis identifies a new significant impact attributable to the project's generation of GHG emissions; however, that impact would be mitigated to below a level of significance due to the project's utilization of a combination of design features and mitigation measures to achieve a net zero GHG emissions level. The analysis is based on the 2017 GCC Analysis (Ldn Consulting, Inc. 2017), which replaces the previous Appendix O. The following summarizes the changes to the GHG emissions now included in Section 2.9.

- Regulatory Framework: Relevant regulatory actions, including those that post-date circulation of the 2015 DFEIR, are discussed in Section 2.9.1.3.

- Methodologies: Updated methodological inputs and assumptions for estimation of the project's GHG emissions, including utilization of a newer modeling platform, are discussed in Section 2.9.2.2.
- Issue 1, Generation of GHG: Based on the updated analysis presented in Section 2.9.2.3, a significant pre-mitigation impact attributable to the project's increase in GHG emissions is identified as Impact GHG-1. Section 2.9.5 has been updated to include mitigation measures M-GHG-1 through M-GHG-3, which – in combination with identified project design features – would reduce project GHG emissions to net zero, which is considered a less than significant impact level, as discussed in Section 2.9.6.
- Issue 2, Conflict with Plans, Policies or Regulations: Based on the updated analysis presented in Section 2.9.2.4, the project would not conflict with relevant policies of the County's General Plan and would not conflict with the region's Sustainable Communities Strategy.

As detailed in the GCC Technical Memorandum, GHG emissions resulting from updated traffic volumes would not change the analysis or conclusions reached in the 2018 GCC Analysis.

***Conclusion related to Recirculation of Section 2.9/3.1.2, Greenhouse Gas Emissions:*** The identification of new impacts and associated mitigation measures would constitute significant new information as defined in CEQA Guidelines, Section 15088.5. Therefore, Section 2.9/3.1.2 and the updated 2018 GCC Analysis (Appendix O) are included in the recirculation for review and comment. Additionally, while no new significant impacts were identified as a result of the increased road volumes (see TIS Addendum), the Global Climate Change Memorandum is also included for review and comment

#### **IV. RECIRCULATION FINDINGS/SCOPE OF PUBLIC COMMENTS**

As detailed above, the following documents are included in the recirculation:

- 2018 FEIR Section 2.3, Transportation/Traffic;
- 2018 FEIR Section 2.9, Greenhouse Gas emissions;
- Global Climate Change Analysis;
- Global Climate Change Technical Memorandum;
- Traffic Impact Study Addendum;
- Air Quality Technical Memorandum; and
- Noise Technical Memorandum

CEQA requires that all public comments be limited to the recirculated documents described above. Comments on such recirculated documents must be received no later than April 2, 2018 at 4:00 p.m. and should reference the project numbers and name: Lilac Hills Ranch Project, PDS2012-3800-12-001 (GPA), PDS2012-3810-12-001 (SP), PDS2012-3600-12-003 (REZ), PDS2012-3100-5571 (TM), PDS2012-3100-5572 (TM),



PDS2012-3300-12-005 (MUP), PDS2012-3500-12-018 (STP), HLP XX-XXX, LOG NO. 3910 12-02-003 (ER); SCH NO. 2012061100.

Comments must be sent to the Planning & Development Services address listed below or via e-mail to [mark.slovick@sdcounty.ca.gov](mailto:mark.slovick@sdcounty.ca.gov).

The revised 2018 DEIR in its entirety is available on the County of San Diego Department of Planning and Development Services website at:

[http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC\\_HILLS\\_RANCH/LILAC-HILLS-RANCH.html](http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC_HILLS_RANCH/LILAC-HILLS-RANCH.html)

or at the County of San Diego Planning & Development Services offices at 5510 Overland Road, Suite 310, San Diego, California, 92123.

## **V. LILAC HILLS RANCH SPECIFIC PLAN (SP12-001)**

The Lilac Hills Ranch Specific Plan (SP12-001) has also been made available for public review along with Appendix J to the Specific Plan. Changes have been made to the Specific Plan to reflect the recommendations that were made by the Planning Commission and County staff at the September 11, 2015 hearing. Each of these changes is discussed below in Section VI. (Minor modifications have also been made to the Specific Plan to include the Project Design Features that are described in DEIR Section 2.9 and in the 2017 GCC Analysis (Ldn Consulting, Inc. 2017). Please note that the original Appendixes to the Specific Plan are available on the County of San Diego Department of Planning and Development Services website at:

[http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC\\_HILLS\\_RANCH/LILAC-HILLS-RANCH.html](http://www.sdcounty.ca.gov/pds/regulatory/docs/LILAC_HILLS_RANCH/LILAC-HILLS-RANCH.html)

or at the County of San Diego Planning & Development Services offices at 5510 Overland Road, Suite 310, San Diego, California 92123.

## **VI. MODIFICATIONS TO THE SPECIFIC PLAN AS RECOMMENDED BY PLANNING COMMISSION AND COUNTY STAFF**

The following is a discussion of the changes that have been made to the Specific Plan to address the modifications that have been recommended by the Planning Commission and County Staff. Each paragraph includes the following: an explanation of the project modification; a brief comparison to the 2015 DFEIR project description; and a discussion of whether the change triggers additional environmental analysis beyond that previously contained in the 2015 DFEIR.

1. The project has been revised to include construction of West Lilac Road along the northern boundary line to the County 2.2C public road standards, with a 30-foot buffer and reduction of the parkway on the north side.<sup>1</sup> The new design for West Lilac Road is detailed in the Specific Plan. This is a change from the 2015 project design that included a Road Exception Request (Number 5), which proposed a downgrade of West Lilac Road along this same segment of roadway along the

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<sup>1</sup>Project revision based on Planning Commission Recommendation #1.

project's frontage from a 2.2C to a 2.2F classification. The 2015 project also included a General Plan Amendment (GPA) requesting multiple road segments along West Lilac Road to be added to Mobility Element Table M-4 (allowing the road segments to operate at a level of service [LOS] E/F). The revised project would now include a GPA requesting only a single road segment, West Lilac Road between Old Highway 395 and Main Street, to be added to Table M-4.

No additional environmental analysis

The improvement of West Lilac Road to its revised standard would result in additional environmental impacts along the southern boundary of the roadway. These impacts, along with feasible mitigation measures, were analyzed under the Road Design Alternative (Section 4.8.1.5) of the 2015 DEIR. Chapter 4.0 of the 2015 DFEIR included the Road Design Alternative (subchapter 4.8) to address additional significant impacts that could occur if any of the road design exception requests were denied or withdrawn. Therefore, the 2015 DFEIR included a complete analysis of these impacts and they would not represent significant new impacts.

2. The project has been revised to include an improvement to Mountain Ridge Road to a 25 mile per hour (mph) design speed with improvements for an intersection taper to meet public road standards that require centerlines at intersecting roadways to be as nearly a right angle as possible.<sup>2</sup> To meet this standard, approaches to the intersection may need to be widened to allow adequate turning angles. The 2015 project design included Road Exception Requests Number 7 and Number 8, which proposed to construct Mountain Ridge Road to a reduced design speed of 15 mph and requested a waiver of a taper at the intersection of Mountain Ridge Road and Circle R Drive, respectively.

No additional environmental analysis

The improvement of Mountain Ridge Road and the intersection of Mountain Ridge Road and Circle R Drive to a 25 mile per hour (mph) design speed would result in additional environmental impacts. These impacts, along with feasible mitigation measures, have been analyzed under the Road Design Alternative (Sections 4.8.1.7 and 4.8.1.8) of the 2015 DFEIR which analyzed the road design at 30 mph. Chapter 4.0 of the 2015 DFEIR included the Road Design Alternative (subchapter 4.8) to address additional significant impacts that could occur if any of the road design exception requests were denied or withdrawn, in this case, Number 7 and Number 8. Therefore, the 2015 DFEIR included a complete analysis of these impacts and they would not represent significant new impacts. A memorandum dated August 22, 2017 was prepared by Landmark Consulting that confirms the impacts of the 25 mph design speed fall within the previously studied footprint and thus in the same impact limits of the 30 mph design speed (see Appendix J to the Specific Plan).

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<sup>2</sup>Project revision based on Planning Commission Recommendation #2/Staff Report page 52.

3. The project has been revised to require the applicant to resolve access concerns on Mountain Ridge Road prior to implementation of Phase 5.<sup>3</sup> The confirmation of such access rights to Mountain Ridge Road will be provided prior to approval of an Implementing Tentative Map that proposes access to Mountain Ridge Road.

No additional environmental analysis

This would not result in any physical changes to the environment and, therefore, would not change any previously identified impacts associated with Mountain Ridge Road or to the other four phases of the project which are not dependent on Mountain Ridge Road or any other infrastructure in Phase 5. In other words, the other phases of the project are not dependent on the development of Phase 5 or construction of Mountain Ridge Road and will be able to proceed forward, regardless of whether confirmation of such access rights to Mountain Ridge Road are provided. Therefore, no further additional analysis is required.

4. The project will be conditioned as a part of Phase 5's Implementing Tentative Map to resolve overburdening concerns on Mountain Ridge Road prior to approval of an Implementing Tentative Map that proposes access to Mountain Ridge Road.<sup>4</sup>

No additional environmental analysis

The resolution of overburdening issues would not result in any physical changes to the environment and, therefore, would not change any previously identified impacts associated with Mountain Ridge Road. The other phases of the project are not dependent on the development of Phase 5 or construction of Mountain Ridge Road. The improvements to Mountain Ridge Road were included in the Project Description as a project design feature and are not needed as a mitigation measure.

5. Prior to the first Final Map, the Developer shall enter into an agreement with either of the school districts to construct a turn-key K-8 school at a location to be determined by that district at a future date determined by the district.<sup>5</sup> The Specific Plan has been amended to clarify that the project would be required to fund and build a turn-key K-8 school at either the location shown in the Specific Plan or at a location determined by the school district operating the K-8 school through the implementation of an agreement with the appropriate school district.

No additional environmental analysis

The 2015 project design included a school site for the possible location of a K-8 school; therefore, the inclusion of the school site has been analyzed in the 2015 DFEIR. This update would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with this project feature. The 2015 DEIR included the construction of an on-site school so

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<sup>3</sup>Project revision based on Planning Commission Recommendation #3.

<sup>4</sup>Project revision based on Planning Commission Recommendation #4.

<sup>5</sup>Project revision based on Planning Commission Recommendation #5.

no new environmental impacts would be associated with this project feature. Should an off-site location be selected, the school district would assume responsibility for any CEQA analysis that may be needed once a location is selected.

6. The Developer shall construct the Town Center after 1,000 homes are built within the project.<sup>6</sup>

No additional environmental analysis

The 2015 project did not include a requirement for the specific timing of the development of the Town Center or other commercial use areas. The project's impacts associated with the construction and development of the Town Center have already been analyzed in the 2015 DFEIR; the Traffic Impact Study analyzed the build-out of the project phases independently, so that they could be combined or developed in any order. The project is required to implement the proposed mitigation measures for traffic-related impacts based upon the generation of the identified equivalency dwelling units (EDU) as set forth in the MMRP, which takes into account traffic generated by commercial uses and the other non-residential portions of the project. Requiring the development of the Town Center after 1,000th home is related only to the timing of its construction. Therefore, the refined timing of the construction of the Town Center would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with this project feature.

7. The Final EIR will be updated to clarify that the Developer will establish a Mello-Roos (Community Facilities District) for ongoing staffing for fire personnel.<sup>7</sup> Additionally, the project would be required to construct a new fire station or improve and expand the existing fire station to meet the five-minute rule and require the Developer to fund the improvements in accordance with any of the four options analyzed in the 2015 DEIR.

No additional environmental analysis

The establishment of a Community Facilities District, or similar funding mechanism, for ongoing staffing for the fire station would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with this project feature. The project design included the four options for the provision of fire services and was analyzed in the DFEIR-2015.

8. The project has been revised to include a condition of approval that requires the project to improve the wastewater facility no later than the 100th home if the Valley Center Municipal Water District requires the use of the on-site water reclamation facility.<sup>8</sup> A Wastewater Management Alternatives analysis was prepared for the

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<sup>6</sup>Project revision based on Planning Commission Recommendation #7/Staff Specific Plan Recommendations b, Staff Report, page 40.

<sup>7</sup>Project revision based on Planning Commission Recommendation #8.

<sup>8</sup>Project revision based on Planning Commission Recommendation #9.

project which identified four alternatives to provide sewer service to the project. The Valley Center Municipal Water District will ultimately determine which option is implemented in order to provide sewer service to the project.

No additional environmental analysis

Project impacts associated with the provision of a wastewater facility were analyzed in the 2015 DFEIR and include providing interim services to accommodate the community. This clarification of timing of wastewater improvements would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with this project feature.

9. The project has been revised to include a 50-foot buffer (setback) with two rows of trees or similar vegetation around the perimeter of the project, within the project site, with the exception of the south side of West Lilac Road, which will contain a 30-foot buffer.<sup>9</sup> The updated buffers are located within the boundaries of the project's development footprint. The buffer shall include a similar style of landscaping (e.g., orchard style plantings) as the other agricultural buffers. In areas that overlap with the fuel modification zones, the vegetation would comply with Fire Code requirements analyzed within the project's approved Fire Protection Plan (FPP).

No additional environmental analysis

The 2015 project design includes 50-foot buffers, with two rows of trees, surrounding the project site with either agricultural interface areas (2015 DFEIR Figures 2.4-7 through 2.4-7i) or fuel modification zones. Therefore, this revision would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with this project feature for the following reasons. Any remaining areas that did not already have an agricultural interface or fuel modification buffer will include such buffer within the development footprint and will be required to comply with the fuel modification zone requirements and any agricultural buffer requirements as appropriate.

10. The project has been revised to require the construction of Main Street concurrently with the development of Phase 2 or Phase 3, provide access from Phase 4 to either West Lilac Road via Lilac Hills Ranch Road or Residential Road 10 as identified in the Specific Plan, and provide access to either Covey Lane or Rodriguez Road concurrently with the development of Phase 5.<sup>10</sup> The road network design for the project would remain the same as originally proposed, and would meet all County and Local Fire District access requirements providing adequate ingress and egress for residents as well as emergency access.

No additional environmental analysis

The project's impacts associated with traffic and timing was analyzed using a phased approach (Traffic Scenarios A-E) to assure that each phase of construction included

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<sup>9</sup>Staff Specific Plan Recommendation a, Staff Report page 39-40.

<sup>10</sup>Staff Specific Plan Recommendation b, Staff Report page 40.

conditions to construct specific improvements needed to handle the traffic generated by the project. Since the access points would be constructed concurrent with the improvements needed for each phase, and there will be no change to the roadway improvement phasing schedule this revision would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with this project feature.

11. The project has been revised to require coordination with North County Transit District (NCTD) on the future siting of the transit stop in the Town Center of Phase 2, and provide full transit stop improvements concurrently with development of Phase 2 as a condition of project approval.<sup>11</sup> The project will also be required to provide an interim transit stop (shelter and bench) and interim transit service (on-demand vanpool) concurrently with Phase 1 as a condition of project approval. This interim transit service shall provide daily service between the community and the off-site transit center (Escondido Transit Center) through the SANDAG iCommute program until transit service is provided to the site. Such service would be provided by the homeowners association with Phase 1 of the project and would terminate when a transit linkage is proposed by the local transit district. Pick-ups and drop-offs would be at the original project site within the project where a transit stop would be located either on the Village Green or within the Town Center.

No additional environmental analysis

This revision would not trigger any physical changes to the environment and, therefore, would not change any previously identified project impacts associated with construction of the interim and permanent transit stop that has not already been analyzed in the 2015 DFEIR and no further additional analysis is required. Detailed information regarding the implementation parameters of such interim transit service strategies is provided in Chapter 3.0 and Table 2 of the project's "Lilac Hills Ranch TDM Program – VMT Reduction Evaluation" memorandum, as authored by Fehr & Peers (2017), included as part of the 2018 GCC Analysis (part of this recirculation).

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<sup>11</sup> Staff Specific Plan Recommendations c, Staff Report page 40-41.